

APPENDIX A

Original Comment Letters



Alan Como <alan.como@lacity.org>

South Coast AQMD Staff's Comments on Draft Environmental Impact Report on the Proposed 6220 Yucca Street Project (SCH No.: 2015111073)

Margaret Isied <MIsied@aqmd.gov>
To: Alan Como <alan.como@lacity.org>
Cc: Lijin Sun <LSun@aqmd.gov>

Tue, Jun 2, 2020 at 7:39 AM

Dear Mr. Como,

Attached are South Coast AQMD staff's comments on the Draft Environmental Impact Report for the Proposed [6220 Yucca Street](#) Project (SCH No.: 2015111073) (South Coast AQMD Control Number: LAC200423-05). Please contact me if you have any questions regarding these comments.

1-1

Kind regards,

Margaret (Maggie) Isied, MPH

Assistant Air Quality Specialist, CEQA IGR
Planning, Rule Development & Area Sources
South Coast Air Quality Management District
[21865 Copley Drive, Diamond Bar, CA 91765](#)

P. (909) 396-2543
E. misied@aqmd.gov

**Please note that the building is closed to the public and I am working remotely. I will be responding to emails and voice messages during my scheduled work hours: Tuesday – Friday: 7:30 AM to 6:00 PM. Thank you.*

 **LAC200423-05-02 DEIR 6220 Yucca Street Project_20200602.pdf**
155K



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

alan.como@lacity.org

Alan Como, AICP, City Planner
City of Los Angeles, Planning Department
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

June 2, 2020

Draft Environmental Impact Report (Draft EIR) for the Proposed 6220 Yucca Street Project (SCH No.: 2015111073)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish two existing buildings, and construct and operate two buildings with 210 residential units, 136 hotel rooms, and 12,570 square feet of commercial uses, totaling 316,948 square feet on 1.16 acres (Proposed Project). The Proposed Project is located on the southwest corner of Yucca Street and Vista Del Mar Avenue in the community of Hollywood within the City of Los Angeles. Construction of the Proposed Project is anticipated to take 22 months¹. It is anticipated that the Proposed Project will become operational by 2023². Upon reviews of Figure II-2: *Aerial Photograph with Surrounding Land Uses*³ in the Draft EIR and Appendix C-2: *Freeway Health Risk Assessment* of the Draft EIR, South Coast AQMD staff found that U.S. Route 101 is approximate 200 feet north of the Proposed Project⁴.

1-2

South Coast AQMD Staff's Summary of the Air Quality Analysis and Health Risk Assessment

The Lead Agency quantified the Proposed Project's construction and operational emissions and compared those to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's regional construction air quality impacts would be significant for nitrogen oxides (NOx) at 112 pounds per day (lbs/day)⁵. The Lead Agency is committing to implementing a construction mitigation measure (MM)-AQ-1 to require the use of off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and United States Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards for equipment rated at 50 horsepower or greater⁶. With implementation of MM-AQ-1, the Proposed Project's regional construction NOx emissions were reduced to less than significant at 70 lbs/day⁷. The Lead Agency found that the Proposed Project's regional air quality impacts from operation and localized air quality impacts from both construction and operation would all be less than significant⁸.

1-3

¹ Draft EIR. Chapter IV. Air Quality. Page IV. B-45.

² Draft EIR. Chapter II. Project Description. Page II-30.

³ *Ibid.* Page II-4.

⁴ Draft EIR. Appendix C-2: *Freeway Health Risk Assessment*. Page 2.

⁵ Draft EIR. Chapter IV. Air Quality. Page IV.B-67.

⁶ *Ibid.* Page IV.B-68.

⁷ *Ibid.* Page IV.B-69.

⁸ *Ibid.*

The Lead Agency performed a Health Risk Assessment to disclose potential health risks for future residents living at the Proposed Project in the Draft EIR. The Lead Agency found that for a 30-year exposure period, the maximum unmitigated cancer risk from the surrounding high-volume freeway would be 8.1 in one million⁹, which would not exceed South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk¹⁰. According to the City of Los Angeles Municipal Code (LAMC) 99.04.504, filtration systems with Minimum Efficiency Reporting Value (MERV) 13 are required for residential buildings within 1,000 feet for a freeway. Therefore, to comply with LAMC 99.04.504, the Lead Agency will require the Proposed Project to install MERV 13 filters for residential uses¹¹.

1-3

South Coast AQMD Staff's Comments

Siting Sensitive Receptors near Freeways and Other Sources of Air Pollution

Notwithstanding the court rulings, South Coast AQMD staff recognizes that Lead Agencies that approve CEQA documents retain the authority to include any additional information they deem relevant to assessing and mitigating the environmental impacts of a project. Because of South Coast AQMD's concern about the potential public health impacts of siting sensitive populations within close proximity to major sources of air pollution, such as high-volume freeways, South Coast AQMD staff recommends that the Lead Agency review and consider the following comments when making local planning and land use decisions.

1-4

Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptors include schools, daycare centers, nursing homes, elderly care facilities, hospitals, and residential dwelling units. As stated above, the Proposed Project will include, among others, construction of 210 residential units within 200 feet of U.S. Route 101¹². In 2018, U.S. Route 101 had 226,000 annual average daily trips, 32% of which was comprised of 4- and 5-axle trucks at Los Angeles/Highland Avenue Interchange (Post Mile 7.84)¹³. Sensitive receptors living at the Proposed Project could be exposed to diesel particulate matter (DPM) emissions from diesel fueled, heavy-duty trucks passing by on U.S. Route 101. The California Air Resources Board (CARB) has identified DPM as a toxic air contaminant based on its carcinogenic effects¹⁴. Future residents at the Proposed Project could be exposed to DPM emissions from the mobile sources traveling on U.S. Route 101 (e.g., diesel fueled, heavy-duty trucks).

Health Risk Reduction Strategies

Many strategies are available to reduce exposure, including, but not limited to, building filtration systems with MERV 13 or better, or in some cases, MERV 15 or better is recommended; building design, orientation, location; vegetation barriers or landscaping screening, etc. Enhanced filtration units are capable of reducing exposures. Installation of enhanced filtration units can be verified during occupancy

1-5

⁹ Draft EIR. Appendix C-2: *Freeway Health Risk Assessment*. Page 15.

¹⁰ South Coast AQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When South Coast AQMD acts as the Lead Agency, South Coast AQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

¹¹ Draft EIR. Appendix C-2: *Freeway Health Risk Assessment*. Page 8.

¹² Draft EIR. Appendix C-2: *Freeway Health Risk Assessment*. Page 2.

¹³ California Department of Transportation. 2018. *Truck Traffic: Annual Average Daily Truck Traffic*. Accessed at: <https://dot.ca.gov/-/media/dot-media/programs/traffic-operations/documents/f0017681-2016-aadt-truck-ally.pdf>

¹⁴ California Air Resources Board. August 27, 1998. Resolution 98-35. Accessed at: <http://www.arb.ca.gov/regact/diesltac/diesltac.htm>.

inspection prior to the issuance of an occupancy permit. Here, the Lead Agency requires installation of MERV 13 filters at the Proposed Project¹⁵ in accordance with LAMC 99.04.504.

Enhanced filtration systems have limitations. In a study that South Coast AQMD conducted to investigate filters¹⁶, a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter. The initial start-up cost could substantially increase if an HVAC system needs to be installed. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the building tenants. It is typically assumed that the filters operate 100 percent of the time while sensitive receptors are indoors, and the environmental analysis does not generally account for the times when sensitive receptors have windows or doors open or are in common space areas of a project. Moreover, these filters have no ability to filter out any toxic gases from vehicle exhaust. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail and disclosed to prospective residences prior to assuming that they will sufficiently alleviate exposures to DPM emissions.

Because of limitations, to ensure that enhanced filters are enforceable throughout the lifetime of the Proposed Project and effective in reducing exposures to DPM emissions, South Coast AQMD staff recommends that the Lead Agency provide additional details regarding the ongoing, regular inspection, monitoring, and maintenance of filters in the Final EIR. To facilitate a good-faith effort at full disclosure and provide useful information to residents who will live at the Proposed Project, at a minimum, the Final EIR should include the following information:

- Disclose the potential health impacts to residents who live in a close proximity to U.S. Route 101 and the reduced effectiveness of the air filtration system when windows are open and/or when residents are outdoors (e.g., in the common usable open space areas);
- Identify the responsible implementing and enforcement agency such as the Lead Agency, property manager(s), and/or building operator(s)/tenant(s) to verify that enhanced filtration units are installed on-site at the Proposed Project before a permit of occupancy is issued to ensure compliance with LAMC 99.05.504;
- Identify the responsible implementing and enforcement agency, such as the Lead Agency, property manager(s), and/or building operator(s)/tenant(s) to ensure that enhanced filtration units are inspected and maintained regularly;
- Disclose the potential increase in energy costs for running the HVAC system to the prospective residents, property manager(s), and/or building operator(s)/tenant(s);
- Provide information to the prospective residents, property manager(s), and/or building operator(s)/tenant(s) on where the MERV 13 filters can be purchased;
- Provide recommended schedules (e.g., every year or every six months) for replacing the enhanced filtration units and disclose that information to the HOA representatives, prospective residents, property manager(s), and/or building operator(s)/tenant(s);

¹⁵ Draft EIR. Appendix C-2: *Freeway Health Risk Assessment*. Page 8.

¹⁶ This study evaluated filters rated MERV 13 or better. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see 2012 Peer Review Journal article by South Coast AQMD: <http://d7.iqair.com/sites/default/files/pdf/Polidori-et-al-2012.pdf>.

Alan Como

June 2, 2020

- Identify the responsible entity, such as the Lead Agency, residents themselves, or property management, for ensuring enhanced filtration units are replaced on time, if appropriate and feasible (if the building operators/tenants and/ or residents should be responsible for the periodic and regular purchase and replacement of the enhanced filtration units, the Lead Agency should include this information in the disclosure form);
- Identify, provide, and disclose ongoing cost sharing strategies, if any, for replacing the enhanced filtration units;
- Set City-wide, or Proposed Project-specific criteria for assessing progress in inspecting and replacing the enhanced filtration units, and maintain records to demonstrate ongoing, regular inspection, monitoring, and maintenance of MERV 13 filters; and
- Develop a City-wide, or Proposed Project-specific process for evaluating the effectiveness of the enhanced filtration units, and maintain records to demonstrate results of the evaluation.



1-5

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project.



1-6

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Margaret Isied, Assistant Air Quality Specialist, at misied@aqmd.gov or (909) 396-2543, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:MI

LAC200423-05

Control Number



Alan Como <alan.como@lacity.org>

SCH # 2015111073 6220 West Yucca Project

Lin, Alan S@DOT <alan.lin@dot.ca.gov>

Mon, Jun 8, 2020 at 4:11 PM

To: "alan.como@lacity.org" <alan.como@lacity.org>, OPR State Clearinghouse <State.Clearinghouse@opr.ca.gov>

Here is Caltrans comment letter.

2-1

Alan Lin, P.E.

Project Coordinator

State of California

Department of Transportation

District 7, Office of Transportation Planning

Mail Station 16

[100 South Main Street](#)

[Los Angeles, CA 90012](#)

(213) 897-8391 Office

(213) 269-1124 Mobile

(213) 897-1337 Fax



LA-2020-03240-West Yucca-DEIR-Final.pdf

132K

DEPARTMENT OF TRANSPORTATION

DISTRICT 7
100 S. MAIN STREET, MS16
LOS ANGELES, CA 90012
PHONE (213) 897-6536
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life.*

June 8, 2020

Mr. Alan Como, AICP
Department of City Planning
City of Los Angeles
221 N Figueroa Street, Suite 1350
Los Angeles, CA 90012

RE: 6220 West Yucca Project
SCH# 2015111073
GTS # LA-2020-03240-DEIR-AL
Vic., LA-101, PM 7.058

Dear Mr. Como:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. The 6220 West Yucca Project proposes to redevelop an approximately 1.16-acre (net area) property (Project). The project would include 210 multi-family residential units, 136 hotel rooms and approximately 12,570 square feet of commercial/restaurant uses in two buildings.

2-2

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. CEQA Guidelines were adopted in December 2018, which implement SB 743's change to CEQA transportation analysis including use of a Vehicle Miles Traveled metric for land use projects. The CEQA Guidelines amendments are available at

<https://resources.ca.gov/About-Us/Legal/CEQA-Supplemental-Documents>

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and local facilities. With limited room to expand vehicular capacity, future development should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to single occupancy vehicle use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

2-3

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing.

Mr. Alan Como, AICP
June 8, 2020
Page 2

We encourage the Lead Agency to integrate transportation and land use in a way that reduces Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions, by facilitating the provision of more proximate goods and services to shorten trip lengths and achieve a high level of non-motorized travel and transit use. We also encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements.

2-3

The Project Site is located on the south side of West Yucca Street between Argyle Avenue and Vista Del Mar Avenue in the Hollywood Community of Los Angeles, approximately five miles northwest of Downtown Los Angeles. The Project Site is served by a network of regional transportation facilities. One of the City's larger and more recent projects, the Hollywood Center Project and this Project are located in an approximately 300 foot radius of the US-101. Also, trips from both projects will likely utilize the same State facilities.

The Project Site is located in an area served by public transit services such as the Metro Red Line, Metro Local 2, Metro Local 180/181, Metro Local 207, Metro Local 210, Metro Local 217, Metro Limited 302, Metro Rapid 757, Metro Rapid 780, LADOT DASH Beachwood Canyon, LADOT DASH Hollywood, and LADOT DASH Hollywood/Wilshire.

The existing bicycle network consists of several types of bicycle facilities. Bicycle lanes are a component of street design, with dedicated striping that separates vehicular traffic from bicycle traffic. These facilities offer a safer environment for both cyclists and motorists. In contrast, bicycle routes and bicycle-friendly streets are located on collector and lower volume arterial streets where motorists and cyclists share the roadway without dedicated striping for a bicycle lane. Streets with dedicated bicycle lanes, sharrows, and other bicycle friendly elements include Franklin Avenue east of Argyle Avenue, Yucca Street west of Vine Street, Yucca Street between Vine Street and Argyle Avenue, Selma Avenue, Cahuenga Boulevard north of Yucca Street, Vine Street south of Yucca Street, and Argyle Avenue between Franklin Avenue and Selma Avenue.

2-4

The Project would provide on-site long-term and short-term bicycle parking consistent with the City's Bicycle Parking Ordinance. Streetscape, landscape, and lighting improvements would enhance pedestrian activity and walkability in and around the Project Site. This pedestrian and bicycle accessibility would serve to improve first/last mile access to nearby transit services, including the Metro Red Line.

The Project would also provide electric vehicle charging in the proposed parking structure. PDF-GHG-2 requires that at least 20 percent of the total code-required parking spaces provided for all types of parking facilities shall be capable of supporting future electric vehicle supply equipment (EVSE). In addition, PDF-GHG-3 requires that at least 5 percent of the total code-required parking spaces shall be equipped with EV charging stations.

Mr. Alan Como, AICP
June 8, 2020
Page 3

The project mitigation measure MM-TRAF-1 Transportation Demand Management (TDM) Program includes at a minimum, the following:

- Unbundled Parking: Provision of unbundled parking for residents (i.e., parking space is leased separately from dwelling units);
- Promotions and Marketing: Employees and residents shall be provided with materials and promotions encouraging use of alternative modes of transportation. This type of campaign would raise awareness of the options available to people who may never consider any alternatives to driving;
- Incentives for using alternative travel modes (such as transit passes);
- Guaranteed ride home program for employees;
- Short-term car rentals; Parking incentives and administrative support for formation of carpools/vanpools; and/or
- Participation as a member in the future Hollywood Transportation Management Organization (TMO), when operational. TMO is an organization that helps to promote some TDM services to a community by providing information about available public transportation options and matching people into ridesharing services.

2-4

The mitigation measure MM-TRAF-1 would implement a TDM program that would result in vehicle trip reductions.

Caltrans commented on the Notice of Preparation for this project in December 2015. Since then, the City of Los Angeles has adopted a VMT metric for transportation analysis in July 2019, in accordance with Senate Bill 743 (2013). As such, Caltrans has reviewed this DEIR from a VMT perspective rather than a level of service perspective.

The Project would generate 11,929 daily VMT (a reduction of 678 daily VMT after TDM), which includes a home-based production daily VMT of 2,862 and a home-based work attraction daily VMT of 796. The Project would generate an average household VMT per capita of 6.0 (1.4 less than prior to mitigation). With mitigation the Project would not exceed the household VMT per capita threshold of 6.0. Though the impact for work VMT for the Project would be less than significant without mitigation, the TDM program would further reduce the average work VMT per employee of 7.1 (compared to the 7.6 Impact Threshold). Thus, with the incorporation of mitigation measure, the Project would meet the threshold criteria of being 15% less than the existing average household VMT per capita for the Central APC area that this project is located in, and the household VMT impact would be reduced to a less than significant level.

2-5

Despite this project's less than significant VMT impacts, Caltrans still has unaddressed safety (i.e. potential traffic conflict) related concerns with this project. Please note that Caltrans is still in the process of developing its new traffic impact study guide, which will include guidance on how to conduct safety analyses on the State facilities. This guide is not expected to be released until later this year.

2-6

Mr. Alan Como, AICP
June 8, 2020
Page 4

As a reminder, storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods.

2-7

Finally, in reviewing the draft environmental document, we are not satisfied that our concerns have been fully addressed. As such, we would like to meet with the City to discuss the details of our concerns and work toward a mutually agreeable resolution. In particular, we would like to discuss, among other things, the distribution percentages to US-101 and its ramps, the appropriate storage length with a reasonable factor of safety, the proper ramp configurations, the signal timing references for signalized intersections, and the cumulative project trips. Any improvements or modifications to the State Highway system that result from our discussion should be included as conditions of approval of the Project by the City.

2-8

We look forward to continue working with the City of Los Angeles to ensure local and state transportation facilities remain safe for the traveling public.

Please feel free to contact Mr. Alan Lin at (213) 897-8391 if you have any questions regarding the above. We look forward to working with you.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse



Alan Como <alan.como@lacity.org>

ENV-2014-4706-EIR

Truong, Cassie <TruongC@metro.net>
To: "alan.como@lacity.org" <alan.como@lacity.org>

Mon, Jun 8, 2020 at 8:32 AM

Greetings,

Thank you for the opportunity to comment on the [6220 West Yucca](#) at 1756, 1760 North Argyle Avenue; 6210-6224 West Yucca Street; and 1765, 1771, 1777, and [1779 North Vista Del Mar Avenue](#). Attached are Metro's comments. Please kindly reply to confirm receipt.

Please contact Shine Ling at 213.922.2671 or lings@metro.net if you have any questions.

3-1

Best,

Cassie Truong
LA Metro

Transportation Associate
Transit Oriented Communities
213.418.3489
metro.net | [facebook.com/losangelesmetro](https://www.facebook.com/losangelesmetro) | [@metrolosangeles](https://twitter.com/metrolosangeles)
Metro's mission is to provide world-class transportation for all.

2 attachments

 **200608_6220 Yucca St.pdf**
163K

 **200110_MAD_Handbook_FINAL_COMPRESSED.pdf**
4231K



Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

June 8, 2020

Alan Como, AICP
City of Los Angeles, Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
Sent by Email: alan.como@lacity.org

RE: 6220 West Yucca: ENV-2014-4706-EIR
Draft Environmental Impact Report (DEIR)- Metro Comments

Dear Mr. Como:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed 6220 West Yucca (Project) located at 1756, 1760 North Argyle Avenue; 6210-6224 West Yucca Street; and 1765, 1771, 1777, and 1779 North Vista Del Mar Avenue in the City of Los Angeles (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

Per Metro’s area of statutory responsibility pursuant to sections 15082(b) and 15086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide the City with information on potential synergies associated with transit-oriented developments that should be considered in the Environmental Impact Report (EIR) for the Project. Implementation of the strategies noted below will further the Project’s ability to achieve its goals under Assembly Bill 900 requirements to reduce Vehicle Miles Traveled (VMT).

In addition to the specific comments outlined below, Metro is providing the City and Riley Realty, L.P. (Applicant) with the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro right-of-way (ROW) and transit facilities, available at www.metro.net/projects/devreview/.

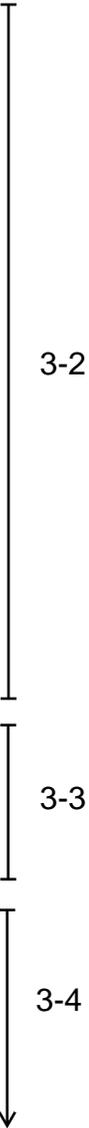
Project Description

The Project includes 210 multi-family residential units, 136 hotel rooms and approximately 12,570 square feet of commercial/restaurant uses. Parking would be provided on-site within the six-level parking structure housed within the podium structure of Building 1 and the two-level parking structure housed within Building 2. The Project is an Environmental Leadership Development Project (ELDP) under Assembly Bill 900, certified by the Governor’s Office on July 26, 2017.

Transit Supportive Planning: Recommendations and Resources

Considering the Project’s proximity to the Hollywood and Vine Station, Metro would like to identify the potential synergies associated with transit-oriented development:

- 1. Transit Supportive Planning Toolkit: Metro strongly recommends that the Applicant review the Transit Supportive Planning Toolkit which identifies 10 elements of transit-supportive places and, applied



collectively, has been shown to reduce vehicle miles traveled by establishing community-scaled density, diverse land use mix, combination of affordable housing, and infrastructure projects for pedestrians, bicyclists, and people of all ages and abilities. This resource is available at <https://www.metro.net/projects/tod-toolkit>.

↑
3-4

2. **Land Use:** Metro supports development of commercial and residential properties near transit stations and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments. Metro encourages the City and Applicant to be mindful of the Project’s proximity to the Hollywood and Vine Station, including orienting pedestrian pathways towards the station.

3-5

3. **Transit Connections and Access:** Metro strongly encourages the Applicant to install Project features that help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the Project site and nearby destinations. The City should consider requiring the installation of such features as part of the conditions of approval for the Project, including:

a. **Walkability:** The provision of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks with ADA-compliant curb ramps, and other amenities along all public street frontages of the development site to improve pedestrian safety and comfort to access the nearby Hollywood and Vine Station.

b. **Bicycle Use and Micromobility Devices:** The provision of adequate short-term bicycle parking, such as ground-level bicycle racks, and secure, access-controlled, enclosed long-term bicycle parking for residents, employees, and guests. Bicycle parking facilities should be designed with best practices in mind, including highly visible siting, effective surveillance, ease to locate, and equipment installation with preferred spacing dimensions, so bicycle parking can be safely and conveniently accessed. Similar provisions for micro-mobility devices are also encouraged. The Applicant should also coordinate with the Metro Bike Share program for a potential Bike Share station at this development.

3-6

c. **First & Last Mile Access:** The Project should address first-last mile connections to transit and is encouraged to support these connections with wayfinding signage inclusive of all modes of transportation. For reference, please review the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at: http://media.metro.net/docs/sustainability_path_design_guidelines.pdf

4. **Parking:** Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements and the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand.

3-7

5. **Wayfinding:** Any temporary or permanent wayfinding signage with content referencing Metro services or featuring the Metro brand and/or associated graphics (such as Metro Bus or Rail pictograms) requires review and approval by Metro Signage and Environmental Graphic Design.

3-8

6. **Transit Pass Programs:** Metro would like to inform the Applicant of Metro’s employer transit pass programs, including the Annual Transit Access Pass (A-TAP), the Employer Pass Program (E-Pass), and Small Employer Pass (SEP) Program. These programs offer efficiencies and group rates that businesses can offer employees as an incentive to utilize public transit. The A-TAP can also be used for residential projects. For more information on these programs, please visit the programs’ website at <https://www.metro.net/riding/eapp/>.

3-9

6220 West Yucca
DEIR – Metro Comments
June 8, 2020

If you have any questions regarding this letter, please contact me by phone at 213-922-2671, by email at DevReview@metro.net, or by mail at the following address:

Metro Development Review
One Gateway Plaza
MS 99-22-1
Los Angeles, CA 90012-2952

3-10

Sincerely,



Shine Ling, AICP
Manager, Transit Oriented Communities

Attachments and links:

- Adjacent Development Handbook: <https://www.metro.net/projects/devreview/>

Los Angeles County
Metropolitan Transportation Authority

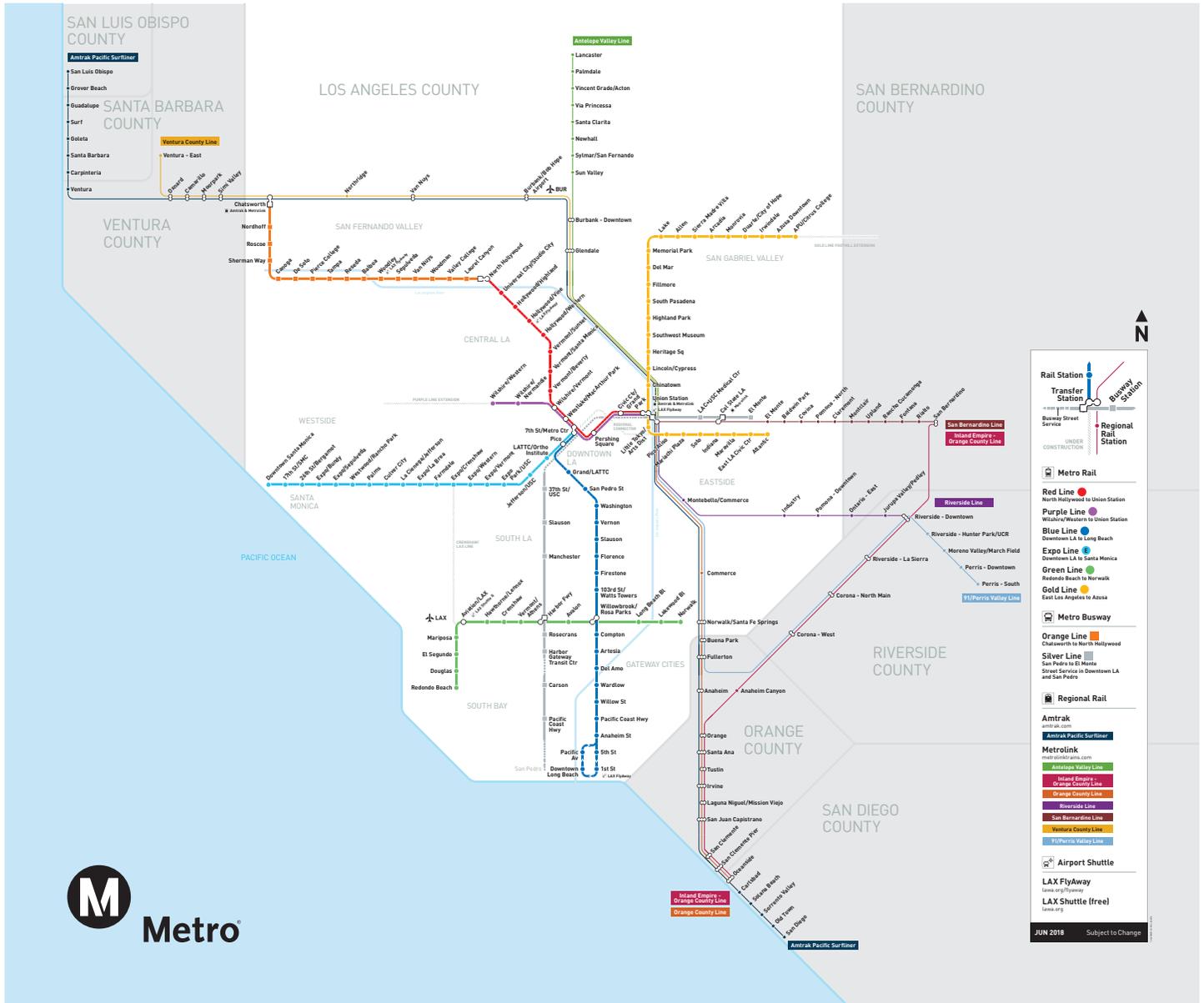
METRO ADJACENT DEVELOPMENT HANDBOOK

A GUIDE FOR CITIES AND DEVELOPERS

JANUARY 2020



Metro and Regional Rail Map



Metro is currently undertaking the largest rail infrastructure expansion effort in the United States. A growing transit network presents new opportunities to catalyze land use investment and shape livable communities.

Table of Contents

Quick Overview	1
Background	2
Metro Purview & Concerns	4
Metro Coordination Process	6
Best Practices	8
1. Site Plan & Conceptual Design	11
1.1 Supporting Transit Oriented Communities	12
1.2 Enhancing Access to Transit	13
1.3 Building Setback	14
1.4 Overhead Catenary System (OCS) Clearance	15
1.5 Shared Barrier Construction & Maintenance	16
1.6 Project Orientation & Noise Mitigation	17
1.7 At-Grade Rail Crossings	18
1.8 Sight-lines at Crossings	19
1.9 Driveway/Access Management	20
1.10 Bus Stop & Zones Design	21
2. Engineering & Technical Review	23
2.1 Excavation Support System Design	24
2.2 Proximity to Tunnels	25
2.3 Protection from Explosion/Blast	26
3. Construction Safety & Management	29
3.1 Pre-Construction Coordination	30
3.2 Track Access and Safety	31
3.3 Construction Hours	32
3.4 Excavation/Drilling Monitoring	33
3.5 Crane Operations	34
3.6 Construction Barriers & Overhead Protection	35
3.7 Pedestrian & Emergency Access	36
3.8 Impacts to Bus Routes & Stops	37
3.9 Utility Coordination	38
3.10 Air Quality & Ventilation Protection	39
Glossary	40



Quick Overview

Purpose of Handbook

The Metro Adjacent Development Handbook (Handbook) is intended to provide information and guide coordination for projects adjacent to, below, or above Metro transit facilities (e.g. right-of-way, stations, bus stops) and services.

Overarching Goal

By providing information and encouraging early coordination, Metro seeks to reduce potential conflicts with transit services and facilities, and identify potential synergies to expand mobility and improve access to transit.

Intended Audience

The Handbook is a resource for multiple stakeholder groups engaged in the development process, including:

- Local jurisdictions who review, entitle, and permit development projects,
- Developers,
- Property owners,
- Architects, engineers, and other technical consultants,
- Builders/contractors,
- Utility companies, and
- other Third Parties.

Handbook Content

The Handbook includes:

- **Introduction** of Metro's Development Review coordination process, common concerns, and typical stages of review.
- **Information** on best practices during three key coordination phases to avoid potential conflicts or create compatibility with the Metro transit system:
 - Planning & Conceptual Design,
 - Engineering & Technical Review, and
 - Construction Safety & Monitoring.
- **Glossary** with definitions for key terms used throughout the Handbook.

RULE OF THUMB: 100 FEET

Metro's Development Review process applies to projects that are within 100 feet of Metro transit facilities.

While the Handbook summarizes key concerns and best practices for adjacency conditions, it does not replace Metro's technical requirements and standards.

Prior to receiving approval for any construction activities adjacent to, above, or below Metro facilities, Third Parties must comply with the Metro Adjacent Construction Design Manual, available on Metro's website.

Contact Us

For questions, contact the Development Review Team:

- Email: devreview@metro.net
- Phone: 213.418.3484

Additional Information & Resources

- Metro Development & Construction Coordination website:
<https://www.metro.net/devreview>
- Metro GIS/KML ROW Files:
<https://developer.metro.net/portfolio-item/metro-right-of-way-gis-data>
- Metrolink Standards and Procedures:
<https://www.metrolinktrains.com/about/agency/engineering--construction>

Metro will continue to revise the Handbook, as needed, to reflect updates to best practices in safety, operations, and transit-supportive development.

Background

Who is Metro?

The Los Angeles County Metropolitan Transportation Authority (Metro) plans, funds, builds, and operates rail, bus, and other mobility services (e.g. bikeshare, microtransit) throughout Los Angeles County (LA County). On average, Metro moves 1.3 million people each day on buses and trains. With funding from the passage of Measure R (2008) and Measure M (2016), the Metro system is expanding. Over the next 40 years, Metro will build over 60 new stations and over 100 miles of transit right-of-way (ROW). New and expanded transit lines will improve mobility across LA County, connecting riders to more destinations and expanding opportunities for development that supports transit ridership. Metro facilities include:



Metro Rail: Metro operates heavy rail (HRT) and light rail (LRT) transit lines in underground tunnels, along streets, off-street in dedicated ROW, and above street level on elevated structures. Heavy rail trains are powered by a “third rail” along the tracks. Light rail vehicles are powered by overhead catenary systems (OCS). To support rail operations, Metro owns and maintains traction power substations (TPSS), maintenance yards, and other infrastructure.



Metrolink/Regional Rail: Metro owns a majority of the ROW within LA County on which the Southern California Regional Rail Authority (SCRRA) operates Metrolink service. Metrolink is a commuter rail system with seven lines that span 388 miles across five counties, including: Los Angeles, Orange, Riverside, San Bernardino, Ventura, and North San Diego. As a SCRRA member agency and property owner, Metro reviews development activity adjacent to Metro-owned ROW on which Metrolink operates, and coordinates with Metrolink on any comments or concerns. Metrolink has its own set of standards and processes, see link on page 1.



Metro Bus Rapid Transit (BRT): Metro operates accelerated bus transit, which acts as a hybrid between rail and traditional bus service. Metro BRT may operate in a dedicated travel lane within a street or freeway, or off-street along dedicated ROW. Metro BRT stations may be located on sidewalks within the public right-of-way, along a median in the center of streets, or off-street on Metro-owned property.



Metro Bus: Metro operates 170 bus lines across more than 1,400 square miles in LA County. The fleet serves over 15,000 bus stops with approximately 2,000 buses. Metro operates “Local” and “Rapid” bus service within the street, typically alongside vehicular traffic, though occasionally in “bus-only” lanes. Metro bus stops are typically located on sidewalks within the public right-of-way, which is owned and maintained by local jurisdictions.

Why is Metro interested in adjacent development?

Metro Supports Transit Oriented Communities: Metro is redefining the role of the transit agency by expanding mobility options, promoting sustainable urban design, and helping transform communities throughout LA County. Metro seeks to partner with local, state, and federal jurisdictions, developers, property owners and other stakeholders across LA County on transit-supportive planning and developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

Adjacent Development Leads to Transit Oriented Communities: Metro supports private development adjacent to transit as this presents a mutually beneficial opportunity to enrich the built environment and expand mobility options. By connecting communities, destinations, and amenities through improved access to public transit, adjacent developments have the potential to:

- reduce auto dependency,
- reduce greenhouse gas emissions,
- promote walkable and bikeable communities that accommodate more healthy and active lifestyles,
- improve access to jobs and economic opportunities, and
- create more opportunities for mobility – highly desirable features in an increasingly urbanized environment.

Opportunity: Acknowledging an unprecedented opportunity to influence how the built environment develops along and around transit and its facilities, Metro has created this document. The Handbook helps ensure compatibility between private development and Metro's transit infrastructure to minimize operational, safety, and maintenance issues. It serves as a crucial first step to encourage early and active collaboration with local stakeholders and identify potential partnerships that leverage Metro initiatives and support TOCs across LA County.



Metro Purview & Concerns

Metro Purview for Review & Coordination

Metro is interested in reviewing development, construction, and utility projects within 100 feet of Metro transit facilities, real estate assets, and ROW – as measured from the edge of the ROW outward – both to ensure the structural safety of existing or planned transit infrastructure and to maximize integration opportunities with adjacent development. The Handbook seeks to:

- Improve communication and coordination between developers, jurisdictions, and Metro.
- Identify common concerns associated with developments adjacent to Metro ROW.
- Highlight Metro operational needs and requirements to ensure safe, continuous service.
- Prevent potential impacts to Metro transit service or infrastructure.
- Maintain access to Metro facilities for riders and operational staff.
- Avoid preventable conflicts resulting in increased development costs, construction delays, and safety impacts.
- Streamline the review process to be transparent, clear, and efficient.
- Assist in the creation of overall marketable and desirable developments.

Key Audiences for Handbook

The Handbook is intended to be used by:

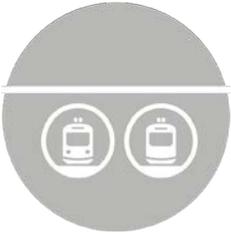
- Local jurisdictions who review, entitle, and permit development projects and/or develop policies related to land use, development standards, and mobility,
- Developers, property owners,
- Architects, engineers, design consultants,
- Builders/contractors,
- Entitlement consultants,
- Environmental consultants,
- Utility companies, and
- other Third Parties.

Metro Assets & Common Concerns for Adjacent Development

The table on the facing page outlines common concerns for development projects and/or construction activities adjacent to Metro transit facilities and assets. These concerns are discussed in greater detail in the following chapters of the Handbook.

METRO ASSETS

COMMON ADJACENCY CONCERNS



UNDERGROUND ROW

Transit operates below ground in tunnels.

- Excavation near tunnels and infrastructure
- Clearance from support structures (e.g. tiebacks, shoring, etc)
- Coordination with utilities
- Clearance from ventilation shafts, surface penetrations (e.g. emergency exits)
- Surcharge loading of adjacent construction
- Explosions
- Noise and vibration/ground movement
- Storm water drainage



AERIAL ROW

Transit operates on elevated guideway, typically supported by columns.

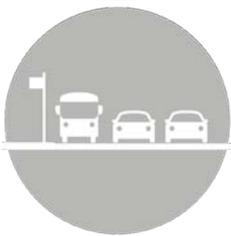
- Excavation near columns and support structures
- Column foundations
- Clearance from OCS
- Overhead protection and crane swings
- Setbacks from property line for maintenance activities to occur without entering ROW
- Coordination with utilities
- Noise reduction (e.g. double-paned windows)



AT-GRADE ROW

Transit operates in dedicated ROW at street level; in some cases tracks are separated from adjacent property by fence or wall.

- Pedestrian and bicycle movements and safety
- Operator site distance/cone of visibility
- Clearance from OCS
- Crane swings and overhead protection
- Trackbed stability
- Storm water drainage
- Noise/vibration
- Driveways near rail crossings
- Setbacks from property line for maintenance activities to occur without entering ROW
- Utility coordination



BUS STOPS

Metro operates bus service on city streets. Bus stops are located on public sidewalks.

- Lane closures and re-routing service during construction
- Temporary relocation of bus stops
- Impacts to access to bus stops



NON-REVENUE/OPERATIONAL

Metro owns and maintains property to support operations (e.g. bus and rail maintenance facilities, transit plazas, traction power substations, park-and-ride parking lots).

- Excavation and clearance from support structures (e.g. tiebacks, shoring, etc)
- Ground movement
- Drainage
- Utility coordination
- Access to property

Metro Coordination Process

Typical Stages of Metro Review and Coordination

Early coordination helps avoid conflicts between construction activities and transit operations and maximizes opportunities to identify synergies between the development project and Metro transit services that are mutually beneficial.



Coordination Goal: Metro encourages developers to consult with the Development Review Team early in the design process to ensure compatibility with transit infrastructure and minimize operational, safety, and maintenance issues with adjacent development. The Development Review team will serve as a case manager to developers and other Third Parties to facilitate the review of plans and construction documents across key Metro departments.

Level of Review: Not all adjacent projects will require significant review and coordination with Metro. The level of review depends on the Project’s proximity to Metro, adjacency conditions, and the potential to impact Metro facilities and/or services. For example, development projects that are excavating near Metro ROW or using cranes near transit facilities require a greater level of review and coordination. Where technical review and construction monitoring is needed, Metro charges fees for staff time, as indicated by asterisk in the above diagram.

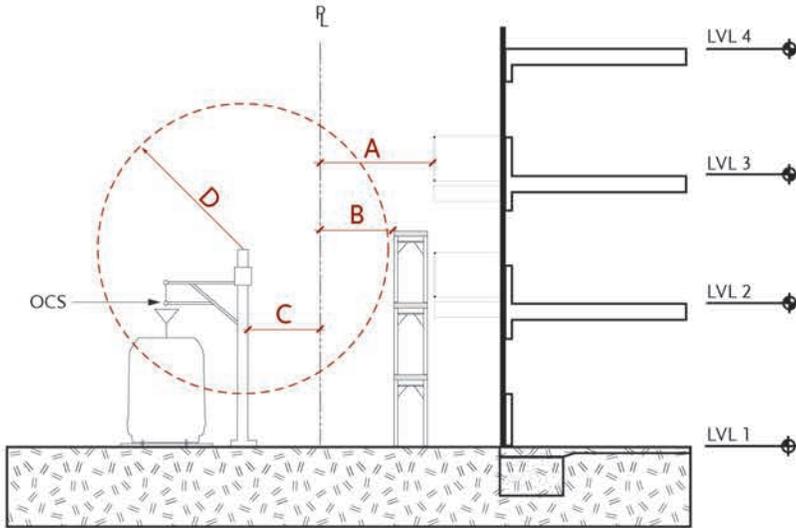
Permit Clearance: Within the City of Los Angeles, Metro reviews and clears Building & Safety permits for projects within 100 feet of Metro ROW, pursuant to [Zoning Information 1117](#). To ensure timely clearance of these permits, Metro encourages early coordination as noted above.

To begin consultation, submit project information via an online [In-Take Form](#), found on Metro’s website. Metro staff will review project information and drawings to screen the project for any potential impacts to transit facilities or services, and determine if require further review and coordination is required. The sample sections on the facing page illustrate adjacency condition information that helps Metro complete project screening.

Contact:

Metro Development Review Team
Website: <https://www.metro.net/devreview>
Email: devreview@metro.net
Phone: 213.418.3484

Sample Section: Adjacency Conditions



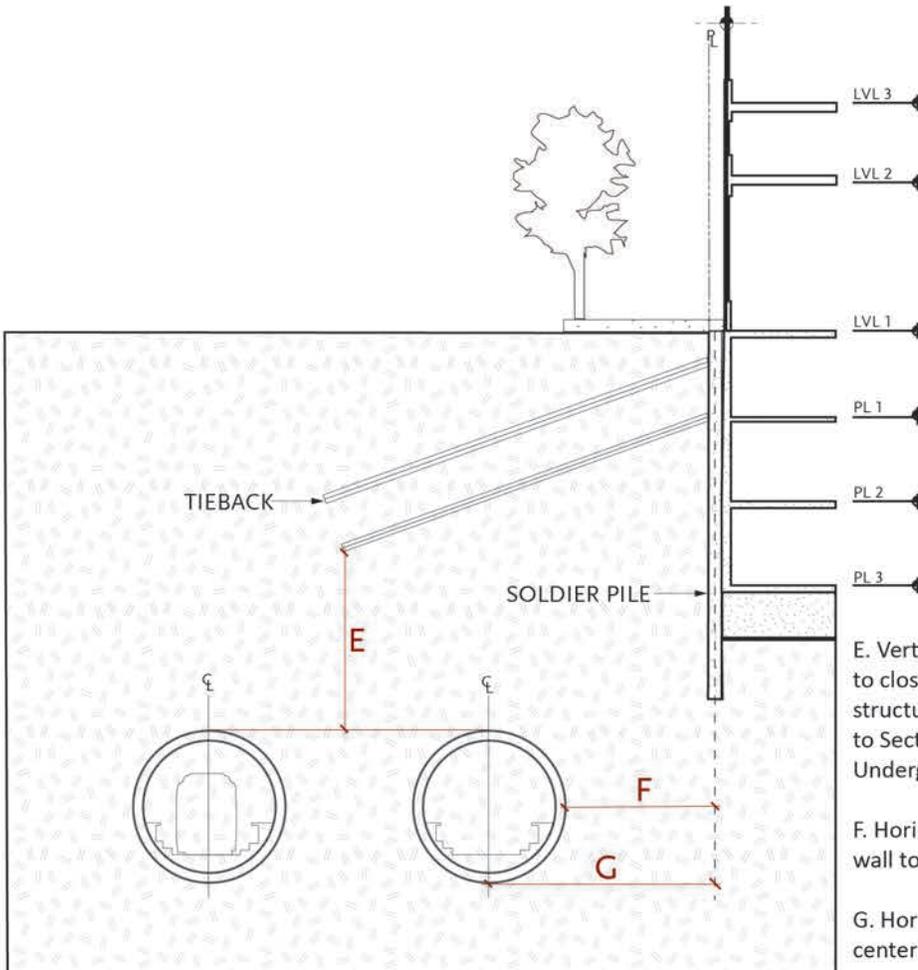
AT-GRADE CONDITION

A. Distance from property line to nearest permanent structure (e.g. building facade, balconies, terraces). Refer to Section 1.3 Building Setback of Handbook.

B. Distance from property line to nearest temporary construction structures (e.g. scaffolding).

C. Distance from property line to nearest Metro facility.

D. Clearance from nearest temporary and/or permanent structure to Overhead Catenary System (OCS). Refer to Section 1.4, OCS Clearance of Handbook.



BELOW-GRADE CONDITION

E. Vertical distance from top of Metro tunnel to closest temporary and/or permanent structure (e.g. tiebacks, foundation). Refer to Section 2.2, Proximity to Tunnels & Underground Infrastructure of Handbook.

F. Horizontal distance from exterior tunnel wall to nearest structure.

G. Horizontal distance from Metro track centerline to nearest structure.

Best Practices

Best Practices for Developer Coordination

Metro encourages developers of projects adjacent to Metro ROW and/or Real Estate Assets to take the following steps to facilitate Metro project review and approval:

1. **Review Metro resources and policies:** The Metro Development & Construction Coordination website and Handbook provide important information for those interested in constructing on, adjacent, over, or under Metro ROW, non-revenue property, or transit facilities. Developers and other Third Parties should familiarize themselves with these resources and keep in mind common adjacency concerns when planning a project.
2. **Contact Metro early during design process:** Metro welcomes the opportunity to provide feedback early in project design, allowing for detection and resolution of important adjacency issues, identification of urban design and system integration opportunities, and facilitation of permit approval. Metro encourages project submittal through the online [In-Take Form](#) to begin consultation.
3. **Maintain communication:** Frequent communication with Metro during project design and construction will reinforce relationships and allow for timely project completion.

Best Practices for Local Jurisdiction Notification

To improve communication between Metro and the development community, Metro suggests that local jurisdictions take the following steps to notify property owners of coordination needs for properties adjacent to Metro ROW by:

- **Updating GIS and parcel data:** Integrate Metro ROW files into the City/County GIS and/or Google Earth Files for key departments (e.g. Planning, Public Works, Building & Safety) to notify staff of Metro adjacency and need for coordination during development approval process.
- **Flag Parcels:** Create an overlay zone as part of local Specific Plan(s) and/or Zoning Ordinance(s) to tag parcels that are within 100 feet Metro ROW and require coordination with Metro early during the development process [e.g. City of Los Angeles Zone Information and Map Access System (ZI-1117)].
- **Provide Resources:** Direct all property owners and developers interested in parcels within 100 feet of Metro ROW to Metro's resources (e.g. website, Handbook).



M

Metro

Downtown
Santa
Monica

E





Site Plan & Conceptual Design

Site Plan & Conceptual Design

1.1 Supporting Transit Oriented Communities

Transit-oriented communities (TOCs) are places that, by their design, make it more convenient to take transit, walk, bike or roll than to drive. By working closely with the development community and local jurisdictions, Metro seeks to ensure safe construction near Metro facilities and improve compatibility with adjacent development to increase transit ridership.

RECOMMENDATION: Consider site planning and building design strategies to that support transit ridership, such as:

- Leveraging planning policies and development incentives to design a more compelling project that capitalizes on transit adjacency and economy of scales.
- Programming a mix of uses to create lively, vibrant places that are active day and night.
- Utilizing Metro policies and programs that support a healthy, sustainable, and welcoming environment around transit service and facilities.
- Prioritizing pedestrian-scaled elements to create spaces that are comfortable, safe, and enjoyable.
- Activating ground floor with retail and outdoor seating/activities to bring life to the public environment.
- Reducing and screening parking to focus on pedestrian activity.
- Incorporating environmental design elements that help reduce crime (e.g. windows and doors that face public spaces, lighting).



The Wilshire/Vermont Metro Joint Development project leveraged existing transit infrastructure to catalyze a dynamic and accessible urban environment. This project accommodates portal access into the Metro Rail system and on-street bus facilities.



1.2 Enhancing Access to Transit

Metro seeks to create a comprehensive, integrated transportation network and supports infrastructure and design that allows safe and convenient access to its multi-modal services. Projects in close proximity to Metro's services and facilities present an opportunity to enhance the public realm and connections to/from these services for transit riders as well as users of the developments.

RECOMMENDATION: Design projects with transit access in mind. Project teams should capitalize on the opportunity to improve the built environment and enhance the public realm for pedestrians, bicyclists, persons with disabilities, seniors, children, and users of green modes. Metro recommends that projects:

- Orient major entrances to transit service, making access and travel safe, intuitive, and convenient.
- Plan for a continuous canopy of shade trees along all public right-of-way frontages to improve pedestrian comfort to transit facilities.
- Add pedestrian lighting along paths to transit facilities and nearby destinations.
- Integrate wayfinding and signage into project design.
- Enhance nearby crosswalks and ramps.
- Ensure new walkways and sidewalks are clear of any obstructions, including utilities, traffic control devices, trees, and furniture.
- Design for seamless, multi-modal pedestrian connections, making access easy, direct, and comfortable.



The City of Santa Monica leveraged investments in rail transit and reconfigured Colorado Avenue to form a multi-modal first/last mile gateway to the waterfront from the Downtown Santa Monica Station. Photo by PWP Landscape Architecture

Site Plan & Conceptual Design

1.3 Building Setback

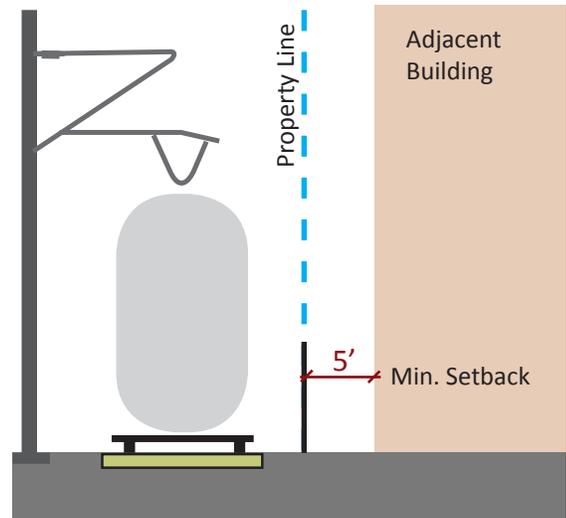
Buildings and structures with a zero lot setback that closely abut Metro ROW can pose concerns to Metro during construction. Encroachment onto Metro property to construct or maintain buildings is strongly discouraged as this presents safety hazards and may disrupt transit service and/or damage Metro infrastructure.

RECOMMENDATION: Include a minimum setback of five (5) feet from the property line to building facade to accommodate the construction and maintenance of structures without the need to encroach upon Metro property. As local jurisdictions also have building setback requirements, new developments should comply with the greater of the two requirements.

Entry into the ROW by parties other than Metro and its affiliated partners requires written approval. Should construction or maintenance of a development necessitate temporary or ongoing access to Metro ROW, a Metro Right of Entry Permit must be requested and obtained from Metro Real Estate for every instance access is required. Permission to enter the ROW is granted solely at Metro's discretion.

Coordination between property owners of fences, walls, and other barriers along property line is recommended. See Section 1.5.

Refer to Section 3.2 – Track Access and Safety for additional information pertaining to ROW access in preparation for construction activities.



A minimum setback of five (5) feet between an adjacent structure and Metro ROW is strongly encouraged to allow project construction and ongoing maintenance without encroaching on Metro property.

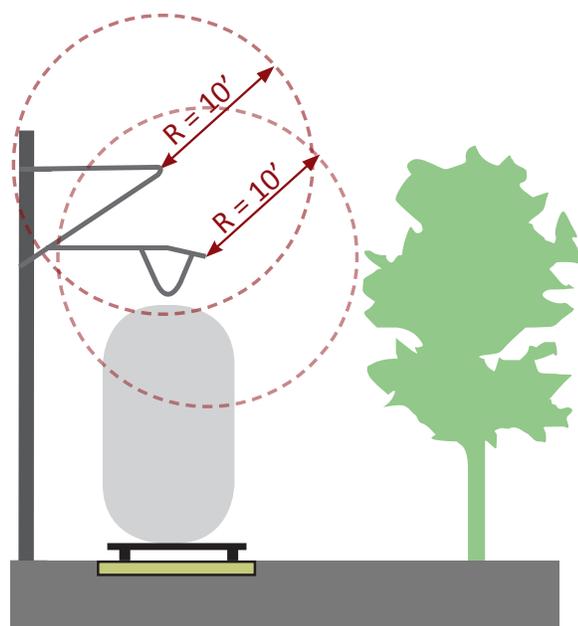


1.4 Overhead Catenary System (OCS) Clearance

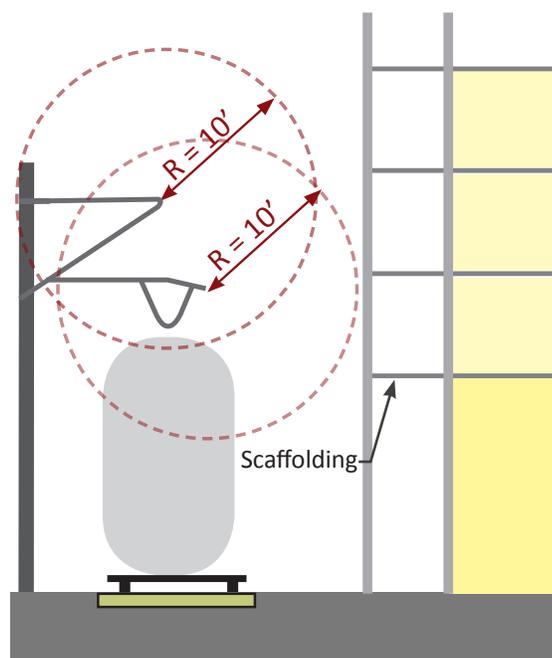
Landscaping and tree canopies can grow into the OCS above light rail lines, creating electrical safety hazards as well as visual and physical impediments for trains. Building appurtenances facing rail ROW, such as balconies, may also pose safety concerns to Metro operations as objects could fall onto the OCS.

RECOMMENDATION: Design project elements facing the ROW to avoid potential conflicts with Metro transit vehicles and infrastructure. Metro recommends that projects:

- Plan for landscape maintenance from private property and prevent growth into Metro ROW. Property owners will not be permitted to access Metro property to maintain private development.
- Design buildings such that balconies do not provide building users direct access to Metro ROW.
- Maintain building appurtenances and landscaping at a minimum distance of ten (10) feet from the OCS and support structures. If Transmission Power (TP) feeder cable is present, twenty (20) feet from the OCS and support structures is required. Different standards will apply for Metro Trolley Wires, Feeder Cables (wires) and Span Wires.



Adjacent structures and landscaping should be sited and maintained to avoid conflicts with the rail OCS.



Scaffolding and construction equipment should be staged to avoid conflicts with the rail OCS.

Site Plan & Conceptual Design

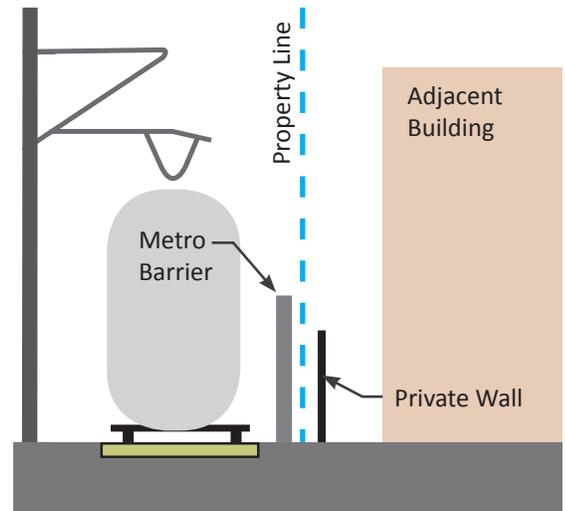
1.5 Shared Barrier Construction & Maintenance

In areas where Metro ROW abuts private property, barrier construction and maintenance responsibilities can be a point of contention with property owners. When double barriers are constructed, the gap created between the Metro-constructed fence and a private property owner's fence can accumulate trash and make regular maintenance challenging without accessing the other party's property.

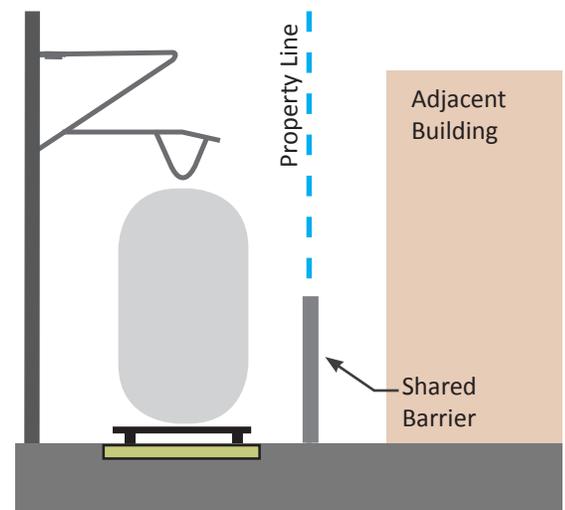
RECOMMENDATION: Coordinate with Metro Real Estate to create a single barrier condition along the ROW property line. With an understanding that existing conditions along ROW boundaries vary throughout LA County, Metro recommends the following, in order of preference:

- **Enhance existing Metro barrier:** if structural capacity allows, private property owners and developers should consider physically affixing improvements onto and building upon Metro's existing barrier. Metro is amenable to barrier enhancements such as increasing barrier height and allowing private property owners to apply architectural finishes to their side of Metro's barrier.
- **Replace existing barrier(s):** if conditions are not desirable, remove and replace any existing barrier(s), including Metro's, with a new single "shared" barrier built on the property line.

Metro is amenable to sharing costs for certain improvements that allow for clarity in responsibilities and adequate ongoing maintenance from adjacent property owners without entering Metro's property. Metro Real Estate should be contacted with case-specific questions and will need to approve shared barrier design, shared financing, and construction.



Double barrier conditions allow trash accumulation and create maintenance challenges for Metro and adjacent property owners.



Metro prefers a single barrier condition along its ROW property line.



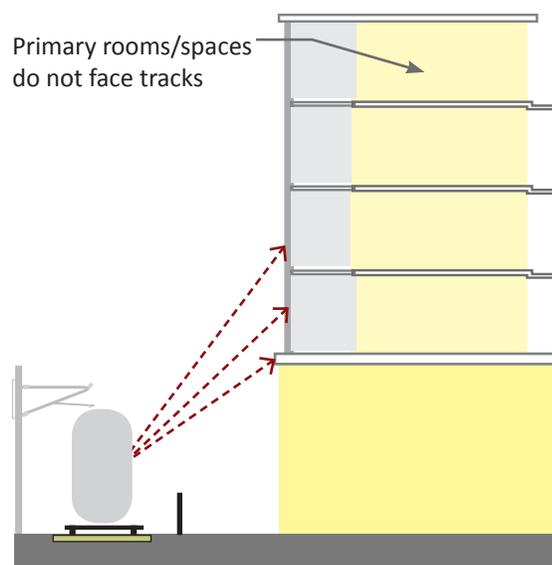
1.6 Project Orientation & Noise Mitigation

Metro may operate in and out of revenue service 24 hours per day, every day of the year, which can create noise and vibration (i.e. horns, power washing). Transit service and maintenance schedules cannot be altered to avoid noise for adjacent developments. However, noise and vibration impacts can be reduced through building design and orientation.

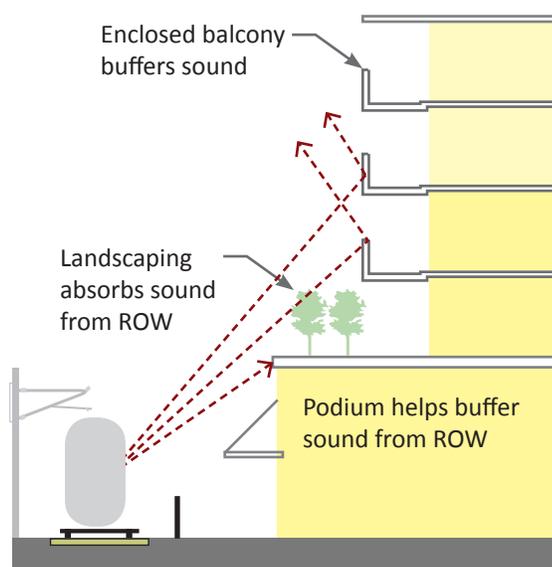
RECOMMENDATION: Use building orientation, programming, and design techniques to reduce noise and vibration for buildings along Metro ROW:

- Locate secondary or “back of house” rooms (e.g. bathrooms, stairways, laundry rooms) along ROW, rather than primary living spaces that are noise sensitive (e.g. bedrooms and family rooms).
- Use upper level setbacks and locate living spaces away from ROW.
- Enclose balconies.
- Install double-pane windows.
- Include language disclosing potential for noise, vibration, and other impacts due to transit proximity in terms and conditions for building lease or sale agreements to protect building owners/sellers from tenant/buyer complaints.

Developers are responsible for any noise mitigation required, which may include engineering designs for mitigation recommended by Metro or otherwise required by local municipalities. A recorded Noise Easement Deed in favor of Metro may be required for projects within 100 feet of Metro ROW to ensure notification to tenants and owners of any proximity issues.



Building orientation can be designed to face away from tracks, reducing the noise and vibration impacts.



Strategic placement of podiums and upper-level setbacks on developments near Metro ROW can reduce noise and vibration impacts.

Site Plan & Conceptual Design

1.7 At-Grade Rail Crossings

New development is likely to increase pedestrian activity at rail crossings. Safety enhancements may be needed to upgrade existing rail crossings to better protect pedestrians.

RECOMMENDATION: Coordinate with Metro, the California Public Utilities Commission (CPUC), and any other transit operators using the crossing (e.g. Metrolink) to determine if safety enhancements are needed for nearby rail crossings.

While Metro owns and operates the rail ROW, the CPUC regulates all rail crossings. Contact the CPUC early in the design process to determine if they will require any upgrades to existing rail crossings. The CPUC may request to review development plans and hold a site visit to understand future pedestrian activity. Metro's Corporate Safety Department can support the developer in coordination with the CPUC.



Gates and pedestrian arms are common types of safety elements for pedestrians at rail crossings.



1.8 Sight-lines at Crossings

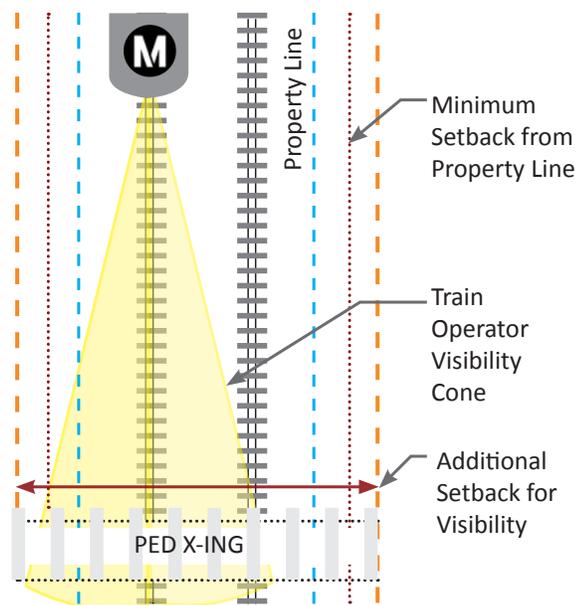
Developments adjacent to Metro ROW can present visual barriers to transit operators approaching vehicular and pedestrian crossings. Buildings and structures in close proximity to transit corridors can reduce sight-lines and create blind corners where operators cannot see pedestrians. This requires operations to reduce train speeds, which decreases efficiency of transit service.

RECOMMENDATION: Design buildings to maximize transit service sight-lines at crossings, leaving a clear cone of visibility to oncoming vehicles and pedestrians.

Metro Rail Operations will review, provide guidance, and determine the extent of operator visibility for safe operations. If the building envelope overlaps with the visibility cone near pedestrian and vehicular crossings, a building setback may be necessary to ensure safe transit service. The cone of visibility at crossings and required setback will be determined based on vehicle approach speed.



Limited sight-lines for trains approaching street crossings create unsafe conditions.



Visibility cones allow train operators to respond to safety hazards.

Site Plan & Conceptual Design

1.9 Driveway/Access Management

Driveways adjacent to on-street bus stops can create conflict for pedestrians walking to/from or waiting for transit. Additionally, driveways accessing parking lots and loading zones at project sites near Metro Rail and BRT crossings can create queuing issues along city streets and put vehicles in close proximity to fast moving trains and buses, which pose safety concerns.

RECOMMENDATION: Site driveways and other vehicular entrances to avoid conflicts with pedestrians, bicycles, and transit vehicles by:

- Placing driveways along side streets and alleys, away from on-street bus stops and transit crossings to minimize safety conflicts between active ROW, transit vehicles, and people, as well as queuing on streets.
- Locating vehicular driveways away from transit crossings or areas that are likely to be used as waiting areas for transit services.
- Placing loading docks away from sidewalks where transit bus stop activity is/will be present.
- Consolidating vehicular entrances and reduce width of driveways.
- Using speed tables to slow entering/exiting automobiles near pedestrians.
- Separating pedestrian walkways to minimize conflict with vehicles.
- Encouraging safe non-motorized travel.



Driveways in close proximity to each other compromise safety for those walking to/from transit and increase the potential for vehicle-pedestrian conflicts.

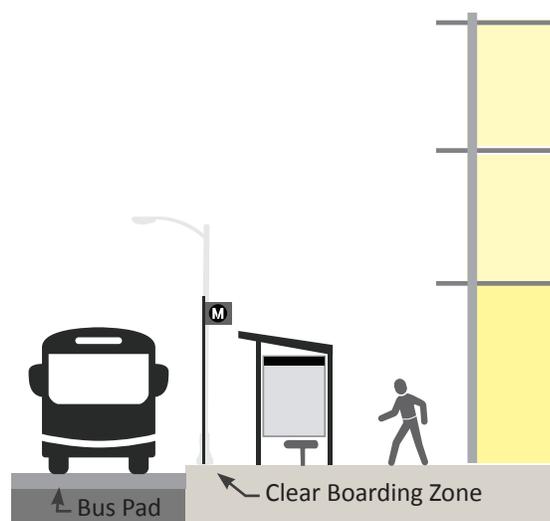


1.10 Bus Stop & Zones Design

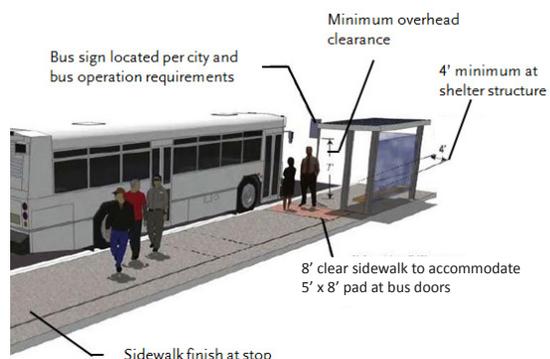
Metro Bus serves over 15,000 bus stops throughout the diverse landscape that is LA County. Typically located on sidewalks within public right-of-way owned and maintained by local jurisdictions, existing bus stop conditions vary from well-lit and sheltered spaces to uncomfortable and unwelcoming zones. Metro is interested in working with developers and local jurisdictions to create a vibrant public realm around new developments by strengthening multi-modal access to/from Metro transit stops and enhancing the pedestrian experience.

RECOMMENDATION: When designing around existing or proposed bus stops:

- Review Metro’s Transit Service Policy, which provides standards for design and operation of bus stops and zones for near-side, far-side, and mid-block stops.
- Review Metro’s Transfers Design Guide for more information at <https://www.metro.net/projects/station-design-projects/>
- Accommodate 5’ x 8’ landing pads at bus doors (front and back door, which are typically 23 to 25 feet apart).
- Locate streetscape elements (e.g. tree planters, street lamps, benches, shelters, trash receptacles and newspaper stands) outside of bus door zones to protect transit access and ensure a clear path of travel.
- Install a concrete bus pad within each bus stop zone to avoid street asphalt damage.
- Replace stand-alone bus stop signs with bus shelters that include benches and adequate lighting.
- Design wide sidewalks (15’ preferred) that accommodate bus landing pads as well as street furniture, landscape, and user travel space.
- Consider tree species, height, and canopy shape (higher than 14’ preferred) to avoid vehicle conflicts at bus stops. Trees should be set back from the curb and adequately maintained to prevent visual and physical impediments for buses when trees reach maturity. Avoid planting of trees that have an invasive and shallow root system.



A concrete bus pad should be located at bus stops and bus shelters should be located along sidewalks to ensure an accessible path of travel to a clear boarding area.



Well-designed and accessible bus stops are beneficial amenities for both transit riders and users of adjacent developments.

GORBEL 2.5
FARMERS, NEW YORK, U.S.A.
DANGER DO NOT EXCEED RATED CAPACITY





Engineering & Technical Review

Engineering & Technical Review

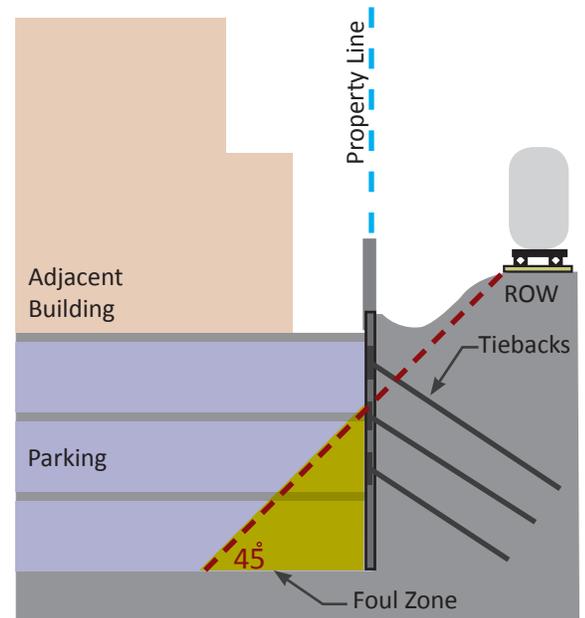
2.1 Excavation Support System Design

Excavation near Metro ROW has the potential to disturb adjoining soils and jeopardize support of existing Metro infrastructure. Any excavation which occurs within the geotechnical foul zone relative to Metro infrastructure is subject to Metro review and approval and meet Cal/OSHA requirements. This foul zone or geotechnical zone of influence shall be defined as the area below a track-way as measured from a 45-degree angle from the edge of the rail track ballast. Construction within this vulnerable area poses a potential risk to Metro service and requires additional Metro Engineering review.

RECOMMENDATION: Coordinate with Metro Engineering staff for review and approval of the excavation support system drawings and calculations prior to the start of excavation or construction. Tiebacks encroaching into Metro ROW may require a tieback easement or license, at Metro's discretion.

Any excavation/shoring within Metrolink operated and maintained ROW will require compliance with SCRRRA Engineering standards and guidelines.

See page 7 for a sample section showing Metro adjacent conditions.



An underground structure located within the ROW foul zone would require additional review by Metro.



2.2 Proximity to Tunnels & Underground Infrastructure

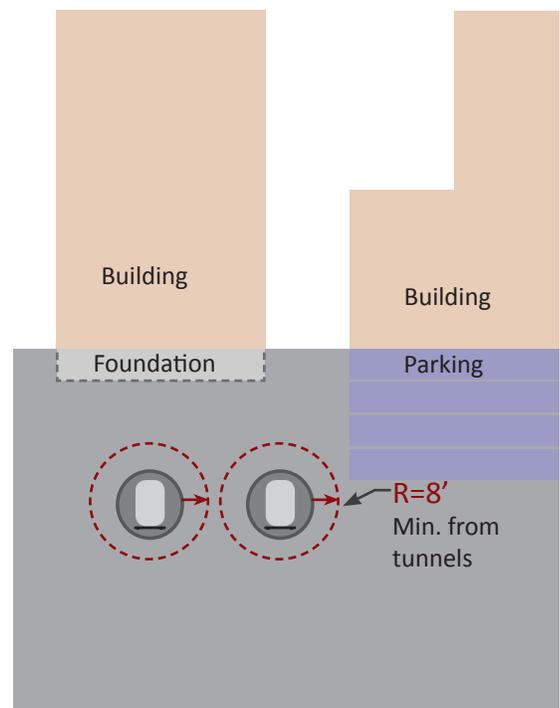
Construction adjacent to, over, or below underground Metro facilities (tunnels, stations and appendages) is of great concern and should be coordinated closely with Metro Engineering.

RECOMMENDATION: Coordinate with Metro early in the design process when proposing to build near underground Metro infrastructure. Metro typically seeks to maintain a minimum eight (8) foot clearance from existing Metro facilities to new construction (shoring or tiebacks). It will be incumbent upon the developer to demonstrate, to Metro’s satisfaction, that both the temporary support of construction and the permanent works do not adversely affect the structural integrity, safety, or continued efficient operation of Metro facilities.

Dependent on the nature of the adjacent construction, Metro will need to review the geotechnical report, structural foundation plans, sections, shoring plan sections and calculations.

Metro may require monitoring where such work will either increase or decrease the existing overburden (i.e. weight) to which the tunnels or facilities are subjected. When required, the monitoring will serve as an early indication of excessive structural strain or movement. See Section 3.4, Excavation Drilling/Monitoring for additional information regarding monitoring requirements.

See page 7 for a sample section showing Metro adjacent conditions.

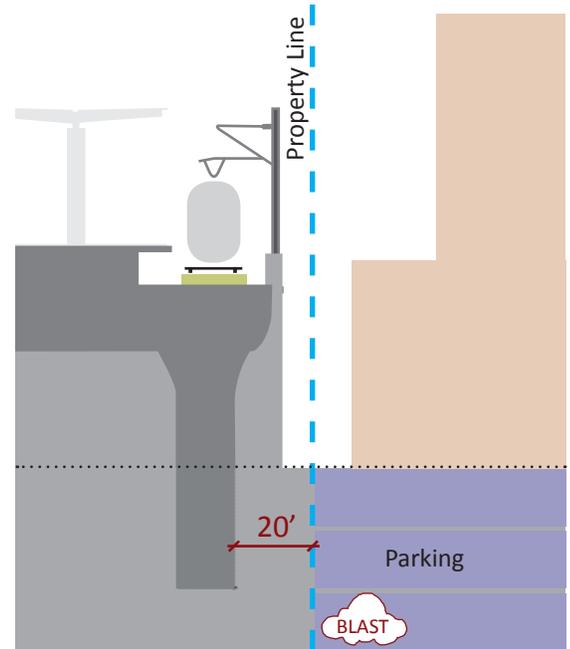


Adjacent project structures in close proximity to underground Metro infrastructure will require additional review by Metro.

2.3 Protection from Explosion/Blast

Metro is obligated to ensure the safety of public transit infrastructure from potential explosive sources which could originate from adjacent underground structures or from at-grade locations, situated below elevated guideways or near stations. Blast protection setbacks or mitigation may be required for large projects constructed near critical Metro facilities.

RECOMMENDATION: Avoid locating underground parking or basement structures within twenty (20) feet from an existing Metro tunnel or facility (exterior face of wall to exterior face of wall). Adjacent developments within this 20-foot envelope may be required to submit a Threat Assessment and Blast/Explosion Study for Metro review and approval.



An underground structure proposed within twenty (20) feet of a Metro structure may require a Threat Assessment and Blast/Explosion Study.

THIS PAGE INTENTIONALLY LEFT BLANK.





Construction Safety & Management

Construction Safety & Management

3.1 Pre-Construction Coordination

Metro is concerned with impacts to service requiring rail single line tracking, line closures, speed restrictions, and bus bridging occurring as a result of adjacent project construction. Projects that will require work over, under, adjacent, or on Metro property or ROW and include operation of machinery, scaffolding, or any other potentially hazardous work are subject to evaluation in preparation for and during construction to maintain safe transit operations and passenger well-being.

RECOMMENDATION: Following an initial screening of the project, Metro may determine that additional on-site coordination may be necessary. Dependent on the nature of the adjacent construction, developers may be requested to perform the following as determined on a case-by-case basis:

- Submit a construction work plan and related project drawings and specifications for Metro review.
- Submit a contingency plan, show proof of insurance coverage, and issue current certificates.
- Provide documentation of contractor qualifications.
- Complete pre-construction surveys, perform baseline readings, and install movement instrumentation.
- Complete readiness review and perform practice run of transit service shutdown per contingency plan.
- Designate a ROW observer or other safety personnel and an inspector from the project's construction team.
- Establish a coordination process for access and work in or adjacent to ROW for the duration of construction.

Project teams will be responsible for the costs of adverse impacts to Metro transit operations caused by work on adjacent developments, including remedial work to repair damage to Metro property, facilities, or systems. Additionally, a Construction Monitoring fee may be assessed based on an estimate of required level of effort provided by Metro.

All projects adjacent to Metrolink infrastructure will require compliance with SCRRRA Engineering Standards and Guidelines.



Metro may need to monitor development construction near Metro facilities.



3.2 Track Access and Safety

Permission from Metro is required to enter Metro property for rail construction and maintenance along, above, or under Metro ROW as these activities can interfere with Metro utilities and service and pose a safety hazard to construction teams and transit riders. Track access is solely at Metro's discretion and is discouraged to prevent electrocution and collisions with construction workers or machines.

RECOMMENDATION: Obtain and/or complete the following to work in or adjacent to Metro Rail ROW:

1. **Construction Work Plan:** Dependent on the nature of adjacent construction, Metro may request a construction work plan, which describes means and methods and other construction plan details, to ensure the safety of transit operators and riders.
2. **Safety Training:** All members of the project construction team will be required to attend Metro Rail Safety Training before commencing work activity. Training provides resources and procedures when working near active rail ROW.
3. **Right of Entry Permit/Temporary Construction Easement:** All access to and activity on Metro property, including easements necessary for construction of adjacent projects, must be approved through a Right-of-Entry Permit and/or a Temporary Construction Easement obtained from Metro Real Estate and may require a fee.
4. **Track Allocation:** All work on Metro Rail ROW must receive prior approval from Metro Rail Operations Control. Track Allocation identifies, reserves, and requests changes to normal operations for a specific track section, line, station, location, or piece of equipment to allow for safe use by a non-Metro entity. If adjacent construction is planned in close proximity to active ROW, flaggers must be used to ensure safety of construction workers and transit riders.



Trained flaggers ensure the safe crossing of pedestrians and workers of an adjacent development.

Construction Safety & Management

3.3 Construction Hours

Building near active Metro ROW poses safety concerns and may require limiting hours of construction which impact Metro ROW to night or off-peak hours so as not to interfere with Metro revenue service. To maintain public safety and access for Metro riders, construction should be planned, scheduled, and carried out in a way to avoid impacts to Metro service and maintenance.

RECOMMENDATION: In addition to receiving necessary construction approvals from the local jurisdiction, all construction work on or in close proximity to Metro ROW must be scheduled through the Track Allocation Process, detailed in Section 3.2.

Metro prefers that adjacent construction with potential to impact normal, continuous Metro operations take place during non-revenue hours (approximately 1am-4am) or during non-peak hours to minimize impacts to service. The developer may be responsible for additional operating costs resulting from disruption to normal Metro service.



Construction during approved hours ensures the steady progress of adjacent development construction and minimizes impacts to Metro's transit service.



3.4 Excavation/Drilling Monitoring

Excavation is among the most hazardous construction activities and can pose threats to the structural integrity of Metro's transit infrastructure.

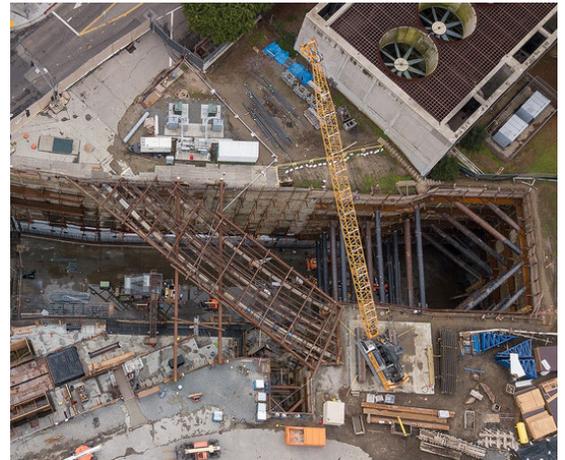
RECOMMENDATION: Coordinate with Metro Engineering to review and approve excavation and shoring plans during design and development, and well in advance of construction (see Sections 2.1 and 2.2).

Geotechnical instrumentation and monitoring will be required for all excavations occurring within Metro's geotechnical zone of influence, where there is potential for adversely affecting the safe and efficient operation of transit vehicles. Monitoring of Metro facilities due to adjacent construction may include the following as determined on a case-by-case basis:

- Pre- and post-construction condition surveys
- Extensometers
- Inclinometers
- Settlement reference points
- Tilt-meters
- Groundwater observation wells
- Movement arrays
- Vibration monitoring



Excavation and shoring plans must be reviewed by Metro to ensure structural compatibility with Metro infrastructure and safety during adjacent development construction.



A soldier pile wall used for Regional Connector station at 2nd/Hope.

Construction Safety & Management

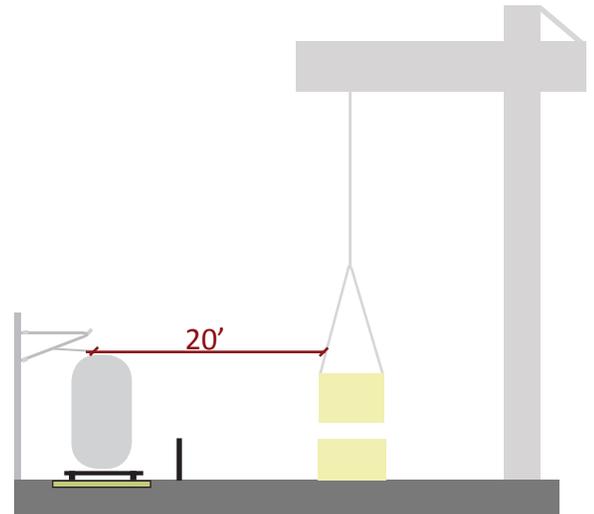
3.5 Crane Operations

Construction activities adjacent to Metro ROW will often require moving large, heavy loads of building materials and machinery by crane. Cranes referred to in this section include all power operated equipment that can hoist, lower, and horizontally move a suspended load. There are significant safety issues to be considered for the operators of crane devices as well as Metro riders and operators.

RECOMMENDATION: Per California Occupational Safety and Health Administration (Cal/OSHA) standards, cranes shall maintain a 20 foot clearance from Metro OCS used to power light rail lines. In the event that a crane or its load needs to enter the 20-foot envelope, OCS lines must be de-energized. De-energizing the Metro OCS is strongly discouraged.

Construction activities which involve swinging a crane and suspended loads over Metro facilities or bus passenger areas shall not be performed during revenue hours. The placement and swing of this equipment are subject to Metro review of a construction work plan request.

Project teams will bear all costs associated with impacts to Metro Rail operations and maintenance.



Cranes and construction equipment should be staged to avoid conflicts with the rail OCS.



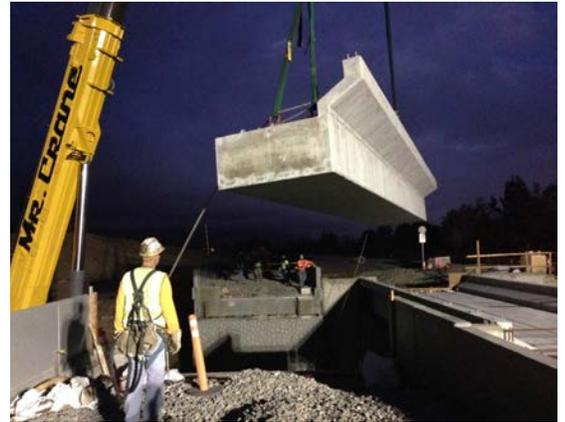
Construction adjacent to the active ROW may require ongoing coordination with Metro.



3.6 Construction Barriers & Overhead Protection

During construction, falling objects can damage Metro facilities and pose a safety concern to the riders accessing them.

RECOMMENDATION: Erect vertical construction barriers and overhead protection compliant with Metro and Cal/OSHA requirements to prevent objects from falling into Metro ROW or areas designed for public access to Metro facilities. A protection barrier shall be constructed to cover the full height of an adjacent project and overhead protection from falling objects shall be provided over Metro ROW as necessary. Erection of the construction barriers and overhead protection for these areas shall be done during Metro non-revenue hours.



Overhead protection is required when moving heavy objects over Metro ROW or in areas designated for public use.

Construction Safety & Management

3.7 Pedestrian & Emergency Access

Metro’s riders rely on the consistency and reliability of access and wayfinding to and from stations, stops, and facilities. Construction on adjacent property must not obstruct pedestrian access, fire department access, emergency egress, or otherwise present a safety hazard to Metro operations, its employees, riders, and the general public. Fire access and safe escape routes within all Metro stations, stops, and facilities must be maintained at all times.

RECOMMENDATION: Ensure pedestrian and emergency access from Metro stations, stops, and transit facilities is compliant with the Americans with Disabilities Act (ADA) and maintained during construction:

- Temporary fences, barricades, and lighting should be installed and watchmen provided for the protection of public travel, the construction site, adjacent public spaces, and existing Metro facilities.
- Temporary signage should be installed where necessary and in compliance with the latest California Manual on Uniform Traffic Control Devices (MUTCD) and in coordination with Metro Art and Design Standards.
- Emergency exits shall be provided and be clear of obstructions at all times.
- Access shall be maintained for utilities such as fire hydrants, stand pipes/connections, and fire alarm boxes as well as Metro-specific infrastructure such as fan and vent shafts.



Sidewalk access is blocked for a construction project, forcing pedestrians into the street or to use less direct paths to the Metro facility.



3.8 Impacts to Bus Routes & Stops

During construction, bus stop zones and routes may need to be temporarily relocated. Metro needs to be informed of activities that require stop relocation or route adjustments in order to ensure uninterrupted service.

RECOMMENDATION: During construction, maintain or relocate existing bus stops consistent with the needs of Metro Bus Operations. Design of temporary and permanent bus stops and surrounding sidewalk areas must be compliant with the ADA and allow passengers with disabilities a clear path of travel to the transit service. Existing bus stops must be maintained as part of the final project. Metro Bus Operations Control Special Events Department and Metro Stops & Zones Department should be contacted at least 30 days before initiating construction activities.



Temporary and permanent relocation of bus stops and layover zones will require coordination between developers, Metro, and other municipal bus operators and local jurisdictions.

Construction Safety & Management

3.9 Utility Coordination

Construction has the potential to interrupt utilities that Metro relies on for safe operations and maintenance. Utilities of concern to Metro include, but are not limited to, condenser water piping, potable/fire water, storm and sanitary sewer lines, and electrical/telecommunication services.

RECOMMENDATION: Coordinate with Metro during project design to gauge temporary and permanent utility impacts and avoid conflicts during construction.

The contractor shall protect existing above-ground and underground Metro utilities during construction and coordinate with Metro to receive written approval for any utilities pertinent to Metro facilities that may be used, interrupted, or disturbed.

When electrical power outages or support functions are required, approval must be obtained through Metro Track Allocation in coordination with Metro Real Estate for a Right of Entry Permit.



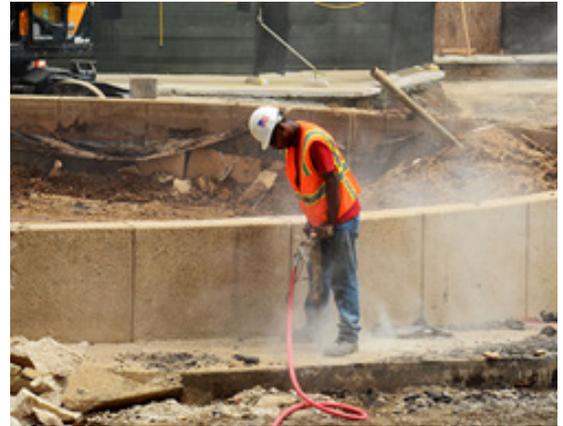
Coordination of underground utilities is critical to safely and efficiently operate Metro service.



3.10 Air Quality & Ventilation Protection

Hot or foul air, fumes, smoke, steam, and dust from adjacent construction activities can negatively impact Metro facilities, service, and users.

RECOMMENDATION: Ensure that hot or foul air, fumes, smoke, and steam from adjacent facilities are discharged beyond 40 feet from existing Metro facilities, including but not limited to ventilation system intake shafts and station entrances. Should fumes be discharged within 40 feet of Metro intake shafts, a protection panel around each shaft shall be required.



A worker breaks up concrete creating a cloud of silica dust.

Glossary

Cone of Visibility

A conical space at the front of moving transit vehicles allowing for clear visibility of travel way and/or conflicts.

Construction Work Plan (CWP)

Project management document outlining the definition of work tasks, choice of technology, estimation of required resources and duration of individual tasks, and identification of interactions among the different work tasks.

Flagger/Flagman

Person who controls traffic on and through a construction project. Flaggers must be trained and certified by Metro Rail Operations prior to any work commencing in or adjacent to Metro ROW.

Geotechnical Foul Zone

Area below a track-way as measured from a 45-degree angle from the edge of the rail track ballast.

Guideway

A channel, track, or structure along which a transit vehicle moves.

Heavy Rail Transit (HRT)

Metro HRT systems include exclusive ROW (mostly subway) trains up to six (6) cars long (450') and utilize a contact rail for traction power distribution (e.g. Metro Red Line).

Joint Development (JD)

JD is the asset management and real estate development program through which Metro collaborates with developers to build housing, retail, and other amenities on Metro properties near transit, typically through ground lease. JD projects directly link transit riders with destinations and services throughout LA County.

Light Rail Transit (LRT)

Metro LRT systems include exclusive, semi-exclusive, or street ROW trains up to three (3) cars long (270') and utilize OCS for traction power distribution (e.g. Metro Blue Line).

Measure R

Half-cent sales tax for LA County approved in November 2008 to finance new transportation projects and programs. The tax expires in 2039.

Measure M

Half-cent sales tax for LA County approved in November 2016 to fund transportation improvements, operations and programs, and accelerate projects already in the pipeline. The tax will increase to one percent in 2039 when Measure R expires.

Metrolink

A commuter rail system with seven lines throughout Los Angeles, Orange, Riverside, San Bernardino, Ventura, and North San Diego counties governed by the Southern California Regional Rail Authority (SCRRA).

Metro Adjacent Construction Design Manual

Volume III of the Metro Design Criteria & Standards, which outlines the Metro adjacent review procedure as well as operational requirements when constructing over, under, or adjacent to Metro facilities, structures, and property.

Metro Bus

Metro "Local" and "Rapid" bus service runs within the street, typically alongside vehicular traffic, though occasionally in "bus-only" lanes.

Metro Bus Rapid Transit (BRT)

High quality bus service that provides faster and convenient service through the use of dedicated ROW, branded vehicles and stations, high frequency and intelligent transportation systems, all-door boarding, and intersection crossing priority. Metro BRT may run within dedicated ROW or in mixed flow traffic on streets.

Metro Design Criteria and Standards

A compilation of documents that govern how Metro transit service and facilities are designed, constructed, operated, and maintained.

Metro Rail

Urban rail system serving LA County consisting of six lines, including two subway lines and four light rail lines.

Metro Rail Design Criteria (MRDC)

Volume IV of the Metro Design Criteria & Standards which establishes design criteria for preliminary engineering and final design of a Metro Rail Project.

Metro Transit Oriented Communities

Land use planning and community development program that seeks to maximize access to transportation as a key organizing principle and promote equity and sustainable living by offering a mix of uses close to transit to support households at all income levels, as well as building densities, parking policies, urban design elements, and first/last mile facilities that support ridership and reduce auto dependency.

Noise Easement Deed

Easement granted by property owners abutting Metro ROW acknowledging noise due to transit operations and maintenance.

Overhead Catenary System (OCS)

One or more electrified wires situated over a transit ROW that transmit power to light rail trains via pantograph, a current collector mounted on the roof of an electric vehicle. Metro OCS is supported by hollow poles placed between tracks or on the outer edge of parallel tracks.

Right of Entry Permit

Written approval granted by Metro Real Estate to enter Metro ROW and property.

Right of Way (ROW)

Legal right over property reserved for transportation purposes to construct, protect, maintain and operate transit services.

Southern California Regional Rail Authority (SCRRA)

A joint powers authority made up of an 11-member board representing the transportation commissions of Los Angeles, Orange, Riverside, San Bernardino and Ventura counties. SCRRA governs and operates Metrolink service.

Threat Assessment and Blast/Explosion Study

Analysis performed when adjacent developments are proposed within twenty (20) feet from an existing Metro tunnel or facility.

Track Allocation/Work Permit

Permit granted by Metro Rail Operations Control to allocate a section of track and perform work on or adjacent to Metro Rail ROW. This permit should be submitted for any work that could potentially foul the envelope of a train.

Wayfinding

Signs, maps, and other graphic or audible methods used to convey location and directions to travelers.

metro.net/projects/devreview/



5/18/2020

LETTER NUMBER ORG 1
City of Los Angeles Mail - Letter in support of Yucca-Arglye Tenants



Alan Como <alan.como@lacity.org>

Letter in support of Yucca-Arglye Tenants

LA Tenants Union South Bay Local <la.tenantsunion.southbaylocal@gmail.com>
To: councilmember.ofarrell@lacity.org, vince.bertoni@lacity.org, alan.como@lacity.org

Fri, May 15, 2020 at 5:40 PM

 **Yucca Argyle Apartments_wilmingtonlocal.pdf**
114K



May 15, 2020

Alan Como, AICP, alan.como@lacity.org
Vince Bertoni, Director of Planning, vince.bertoni@lacity.org
City of Los Angeles, Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

Mitch O'Farrell, 13th District City Councilman, councilmember.ofarrell@lacity.org
6501 Fountain Avenue
Los Angeles, CA 90028

Please accept this letter in support of tenants of the Yucca Argyle Apartments at 6210-6224 Yucca St, Los Angeles, CA 90028, who are also part of the Hollywood Local of the LA Tenants Union.

We insist that the Department of City Planning immediately withdraw the Draft EIR project review until 30 days after the City's Stay at Home order is lifted.

The Yucca Argyle Apartment tenants and the Hollywood Local of the Los Angeles Tenant Union received the Draft EIR notification for 6220 West Yucca Street Project (ENV-2014-4706-EIR) on April 23, 2020. According to the notification, tenants and community members have from April 23, 2020 to June 8, 2020 to submit public comment on the Draft EIR.

It is entirely unacceptable that the Department of City Planning post the public notice for the Draft EIR when we are still under a Stay at Home order due to the COVID-19 health emergency. The notification to the tenants announcing public comment invites community members to make an appointment with the Planning Dept to review the DEIR. The same letter also suggests going to the library to review the DEIR. However, according to the Planning Dept website (<https://planning.lacity.org/contact/public-counters>), no appointments are being taken at this time. All Los Angeles libraries are also closed at this time. The lack of public access to the DEIR violates the process of public comment as required under CEQA.

It is outrageous that the Department of City Planning expects the community to contribute public comment during the present crisis. Our tenant members demand that with limited public resources, this notice and the review period be withdrawn until 30 days after the governor and mayor lift the Stay at Home order.

L.A. Tenants Union, Wilmington/Southbay Local
southbay@latenantsnuion.or

L.A. Tenants Union (LATU)
P.O. Box 27354, Los Angeles, CA 90027
(213) 986-8266



Alan Como <alan.como@lacity.org>

Request to Extend Public Comment Period for 6220 W Yucca Project

Hollywood Heritage <hollywood.heritage1980@gmail.com>

Fri, May 15, 2020 at 12:12 PM

To: alan.como@lacity.org

Cc: Craig Bullock <craig.bullock@lacity.org>, Mindy Nguyen <mindy.nguyen@lacity.org>, george@myhunc.com, jim@myhunc.com, Richard Adkins <rikalad@aol.com>

Dear Mr. Como,

Please see the attached letter from Hollywood Heritage in support of the request from Hollywood United Neighborhood Council and other concerned parties to extend the deadline for public comment on the Draft EIR for the 6220 W Yucca Project and the Hollywood Center Project to August 1st, 2020.

These projects, individually and cumulatively, will significantly alter the historic infrastructure of Hollywood and in particular the Vista del Mar/ Carlos Historic District. In light of the coronavirus pandemic and the ensuing measures to protect the wellbeing of Angelenos, it is crucial for residents to have sufficient time to evaluate the potential impacts of new development on their community.

We strongly urge you to extend the public comment deadline to August 1st. Thank you for your work to support a democratic planning process.

Sincerely,

Richard Adkins
President, Hollywood Heritage, Inc.

2A-1

 **HH DEIR response_6220 W Yucca_5.15.20.pdf**
88K



HOLLYWOOD HERITAGE, INC.
P.O. Box 2586
Hollywood, CA 90078
(323) 874-4005 • FAX (323) 465-5993

May 15, 2020

Alan Como, AICP
City of Los Angeles
Department of City Planning
221 N. Figueroa St., Suite 1350
Los Angeles, CA 90012
alan.como@lacity.org

Re: Extend Public Comment Period for Draft Environmental Impact Report of 6220 W Yucca Project (Case No. ENV-2014-4706-EIR)

Dear Mr. Como:

Hollywood Heritage is writing in support of the request from the Hollywood United Neighborhood Council and other concerned parties to extend the deadline for public comment on the Draft EIR for the 6220 W Yucca Project and the Hollywood Center Project to August 1st, 2020.

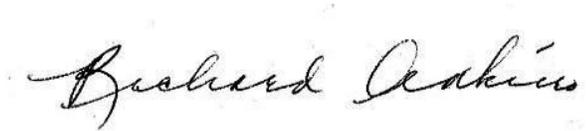
These projects, individually and cumulatively, will significantly alter the historic infrastructure of Hollywood and in particular the Vista del Mar/ Carlos Historic District. In light of the coronavirus pandemic and the ensuing measures to protect the wellbeing of Angelenos, it is crucial for residents to have sufficient time to evaluate the potential impacts of new development on their community.

As Co-Director of the Frank G. Wells Environmental Law Clinic at UCLA Sean Hecht described in his letter to Mayor Garcetti, City Attorney Feuer, and Planning Director Bertoni on March 23rd, 2020, the "Safer At Home" orders have dramatically altered public participation in the planning process. This includes restricted access to paper documents, logistical barriers to communication between and coordination of community groups and the innumerable ways coronavirus has forced residents to reprioritize their actions to meet basic needs. These challenges disproportionately impact our most vulnerable communities. Given these circumstances, additional time is needed to respond to projects of this magnitude.

We therefore strongly urge you to extend the public comment deadline to August 1st. Thank you for your work to support a democratic planning process.

↑
2A-2

Sincerely,

A handwritten signature in black ink that reads "Richard Adkins". The signature is written in a cursive style with a large initial 'R' and a long, sweeping underline.

Richard Adkins
President, Hollywood Heritage, Inc.

CC: Council District 13 and Hollywood United Neighborhood Council



Alan Como <alan.como@lacity.org>

6220 West Yucca Project; ENV-2014-4706-EIR Response

Hollywood Heritage <hollywood.heritage1980@gmail.com>
To: alan.como@lacity.org

Mon, Jun 8, 2020 at 3:58 PM

Dear Mr. Como,

Please find Hollywood Heritage's comments in response to the [6220 West Yucca Project](#) (ENV-2014-4706-EIR Response). If you have any questions do not hesitate to ask.

|
2B-1
|

Best,

Richad Adkins
President
Hollywood Heritage

 **HH Response 6220 W Yucca ENV-2014-4706-EIR 6.8.20.pdf**
737K



HOLLYWOOD HERITAGE, INC.

P.O. Box 2586

Hollywood, CA 90078

(323) 874-4005 • FAX (323) 465-5993

Alan Como, AICP
City of Los Angeles, Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012
alan.como@lacity.org

**Re: 6220 West Yucca Project; 1760 North Argyle Avenue; 6210-6224 West Yucca Street; and 1765, 1771, 1777, and 1779 North Vista Del Mar Avenue
ENV-2014-4706-EIR**

Dear Mr. Como,

The Board of Directors of Hollywood Heritage, its Preservation Issues Committee and its members, thank you for the opportunity to review and comment on the 6220 West Yucca Project. Hollywood Heritage has a keen interest in the future of Hollywood and firmly believes that its historic resources are foundational—to tourism, to its unique character, to its sustainability.

2B-2

For four decades, our organization has participated in the recognition and protection of Hollywood's world-renowned landmarks. During that time, the professional process of identifying historic resources through surveys and national landmark registrations has been completed. Zoning, the Hollywood Community Plan, and the Hollywood Redevelopment Plan were vetted and completed to treat and protect these historic buildings, and to plan for proper growth in their environs.

Demolition a significant adverse effect and is avoidable. This Project damages a recognized nationally significant historic district with a significant adverse effect—demolition of listed structures. It also introduces new construction as infill into a District, and the effect using any metric-- Preservation Brief #14 or another objective standard such as LA HPOZ guidelines—in unacceptable.

2B-3

The Vista del Mar/Carlos Historic District is protected both by laws governing historic properties and by the City's obligations under Sec. 506 of the Redevelopment Plan (Hollywood Core Transition District for Vista del Mar/Carlos, and the Hollywood Boulevard District for Building I). Intentions for this area are crystal clear. The Community Plan and zoning identified this area having special height and density restrictions to reduce possibility of projects such as this one. ZIMAS alerts owners to Historic Preservation Review.

Insensitive alterations to the two buildings (1765 and 1771 Vista del Mar) within this historic District of

national significance happened since the buildings were listed, under the guardianship of CRA, the government agency assigned to avoid such damage. CRA was enjoined from de-listing buildings such as these –buildings must remain listed and protected. These can readily be rehabilitated.

↑
2B-3

The DEIR shows a genuine attempt to “design around” the landmarks demolition, to honor setbacks, etc, and the attempt is recognized by Hollywood Heritage. Compatibility of new designs with historic districts is a detailed process. The sketch of the proposed building on Project Description Page II- 9 and in the Aesthetics Fig 4-A11 shows that it isn’t compatible, despite the effort.

A better outcome: Maybe such a compatible District infill project can be designed, especially if the maximum 9 units is adhered to. A far better solution is rehabilitating the 2 District contributors as dwelling units, perhaps 4, preserving and improving the block face, and moving any remainder into the neighboring oversize building. A further option is to follow the law- execute a Transfer of Development Rights off this property, preserve it in perpetuity, and help justify the request (in part) for tripling density on the adjoining parcel. This project has significant design flaws, but there is a possible environmentally superior outcome.

2B-4

Notable significant effects: We are reviewing yet another DEIR here for a Project with damaging effects, skillfully hidden.

2B-5

- \$28 million gift: The developer is asking for entitlements for 221,891 sf of “gift” in an area with a 2:1 FAR. If this developer is granted triple the density allowed, conservatively this is a \$28 million “gift”, as this developer saves at least that much cash not going out and purchasing additional land. Show the calculations!
- Non-compliant design: The Building I podium design and height is a fork in the eye of the existing community. Zoning was put in place specifically so the middle parcel building height and bulk would step down, cast less shadow, etc, Restrictions on above-grade parking, against podium-type buildings, for a 75’ height limit (NOT 225’) etc are built into Sec 506 of the Redevelopment Plan (in the Hollywood Core Transition District and Hollywood Boulevard Urban Design District Plans). Today all building permits on this site must be reviewed for specific compliance according to the transfer of CRA responsibilities to the City of Los Angeles. This clearly is not compliant..
- Fault our liability?: Hollywood Heritage generally does not comment on earthquake faulting, but the location of the project in the Alquist Priolo Fault Zone and the burden facing us, the City, from taking on this liability when this project is approved is hard to ignore.
- Avoid vibration: As in the Hollywood Center DEIR, impacts from construction vibration are declared “unavoidable”. A monitoring program is prescribed during construction, when it is too late. Please see our comments on Hollywood Center- specifically showing how up-front investigations and engineering can ensure the damage never occurs.
- Real environmental protection: The pretense of sustainability disregards the sustainable City planning already in place: extreme efforts over 30 years to make a livable community with housing choice, with traffic that moves, and with impacts of larger buildings on smaller mitigated.

2B-6

2B-7

2B-8

2B-9

2B-10

The review time with this EIR has coincided with an unprecedented pandemic and civil unrest. Therefore, our organization has been given the minimum amount of time to respond to EIRs for 3 massive projects which will dramatically impact Hollywood. It is astounding that the Planning Department is accelerating “business as usual”. Our City came to its knees over the isolation of its government and police force from its citizens. We boarded up our museum and properties. These 3 overscaled projects couldn’t better illustrate the disregard for Hollywood. The giant Century Cities on our narrow streets from unjustified huge “give-aways” the last 10 years-- countermanding proper planning and permanently harming our world-renowned heritage..

2B-11

We see some good moves by this developer to deal with the demolition of 44 rent- controlled units, and putting 66 new market rate units into rent controlled limitations of rent-increases. But a large hotel and the 66 other units don't appear to do anything for affordability. This Project can qualify for a 35% bonus density under SB 1818, or even more under other affordable housing incentives, AND comply with zoning intent AND genuinely provide affordable housing. A gift of 210,000 sf of development, straining narrow streets to crisis and destroying a neighborhood, has a powerful unstated significant adverse effect on genuine Hollywood.

2B-12

Our comments on the DEIR are as follows:

2B-13

1. Cultural Resources- resources are not well-identified; impacts not fully identified; failure to mitigate.

The DEIR fails to acknowledge the issue of historic resources as articulated in HH's NoP dated December 28, 2015. The impact analysis in the Cultural resources section does not convey the magnitude of the impact of the proposed project on the Vista Del Mar / Carlos District, LA Historic-Cultural Monument Hollywood Little Country Church, and nearby historic resources. This project is the latest example of the disregard that the City has for protection of Hollywood resources. It highlights the extreme vulnerability of Hollywood's historic districts to new development and the City's historic neglect of these designated resources, even those which have been formally determined eligible for the National Register of Historic Places.

2B-14

The DEIR fails to make use of extensive survey and context information in order to properly analyze the significance of the Vista del Mar/ Carlos District. Hollywood has been in the forefront in Southern California in identifying its historic resources. In 1977, the first survey of Hollywood, conducted by the Hollywood Revitalization Committee under a grant from the State Office of Historic Preservation, was one of the first in California. That effort, whose boundaries included today's CRA area but extended east along Franklin to St. Andrews, identified over a dozen potential residential neighborhoods which met the criteria for historic districts. A subset of these neighborhoods were the earliest in Hollywood, constructed largely before 1925. The residential neighborhoods identified on North Wilton, Taft, and Gramercy were not resurveyed in the next series of survey efforts under the auspices of the CRA. The next survey in 1984, whose scope was limited to the boundaries of the Hollywood Redevelopment Plan, identified twelve residential neighborhoods that represented early patterns of development including Vista del Mar/ Carlos.

2B-15

The DEIR correctly notes that by 1994 four of these historic neighborhoods had been lost to new development. This constitutes a 33% reduction in this type of resource over that decade. To be clear, this means that no efforts were made by the CRA and the City to protect historic neighborhoods which were primarily made up of working class housing that provided shelter for motion picture industry employees and support services. The upper middle class residential districts in the hillsides did not suffer the same fate. That same year, due to evaluations required by the State of California and FEMA, the previously identified districts of Vista del Mar/ Carlos, Serrano, and Selma-LeBraig were formally determined eligible for the National Register of Historic Places through consent agreement between the State of Historic Preservation and the Keeper of the National Register in 1994. The Afton/DeLongpre district was added to this group in 1995. By virtue of that status, the districts were included in the California Register when it was implemented in 1998.

The Vista del Mar/Carlos Historic District was found to assume a "greater significance in the community as an intact grouping of residential architecture representative of the Golden Era of Hollywood." due to

this attrition. Even in 1994, preservationists were acknowledging that the ability to tell the full story of community development depended upon preserving all types of resources that represented various socioeconomic and cultural contexts as well as examples of important architectural styles. It was also acknowledged that groups of these resources (districts) conveyed their stories more powerfully than isolated examples and that such groupings deserved separate identification and protections to call out that significance. Hence the preservation protocol to distinguish between groups of buildings with shared contexts and styles (districts) and individual resources. Districts were acknowledged to have character-defining features above and beyond the individual buildings: lot size, street arrangement, landscape features. These features were not always analyzed or “counted” in the way that residences were divided into “contributing and non-contributing resources”. In subsequent planning efforts to protect districts, “non-contributors (those which had been substantially altered or constructed after the period of significance) could be classified as “altered contributors” if they were built during the period of significance and retained massing, scale, and location.

2B-15

None of the four California Register districts were included in the City’s HPOZ efforts, which began in 1979. Despite having the same physical characteristics and historic associations, no protections were extended to these already designated resources. For the most part, subsequent survey efforts in Hollywood in 2003 did not re-evaluate or even look at the conditions. Meanwhile, permits which altered or completely erased the integrity of individual properties were being issued without review or compliance with the Secretary of the Interior’s Standards. By 2010 when the next comprehensive property by property survey was conducted, several identified working class districts no longer retained the necessary cohesion and numbers of contributing buildings to be considered districts. Neighborhoods on Tamarind, Sycamore, Harold Way and St. Andrews Place had been erased, along with the contributions of the citizens who built them.

2B-16

In 2010, the CRA survey team headed by Robert Chattel Associates did look at the condition of the Vista del Mar district and identified alterations to two of the contributors which damaged their integrity. This team recommended changing the status of those two buildings to non-contributors. While this is valuable information as to the effect of alterations, it is not a formal ruling on the status of these buildings. This can only be done in consultation with the State Office of Historic Preservation. While 16 district contributors were listed on the California State Register, by 2010, the Chattel survey only identified 14 contributors. One residence at 6142-6144 Carlos had been demolished. The survey changed the evaluation code of 1771 North Vista del Mar Avenue to reflect its alterations (6Z). 1751 North Vista del Mar Avenue was somehow excluded from the report. (The DEIR concludes that 1751 North Vista del Mar still appears to retain its integrity as a contributor.) Now, the DEIR consultants have stated that the number of contributors will be reduced yet again to 13 by arguing that the integrity of 1765 Vista del Mar has been diminished as well. The Appendix to the DEIR acknowledges that there is a process for such input, but then does not pursue it as it opines that there is not an adverse effect on the district.

All 16 properties are still listed on the California State Register with an evaluation of 2D2. Despite this, there have been constant challenges to their integrity as evidenced by the condition of 1771 and 1765 Vista Del Mar. Hollywood Heritage acknowledges that the integrity of these properties has been diminished. However, this has occurred after the designation of the district points to the failure of the City to protect these resources. Districts are lost by attrition: one cut at a time until the district as a whole is no longer viable. The loss of 6142 Carlos one after the district was listed caused a 6% loss in built fabric, but also altered the relationship of the Carlos and Vista del Mar intersection. Now two more buildings from the period of significance are proposed for demolition. This means that 12% more of the original fabric will be forever lost, as well as the lot sizes which characterize the subdivision and the alignment of like structures which make up the Vista del Mar block.

2B-17

The proposed Building 2 does not respect lot division, size, scale, massing, or open space patterns of the district and creates an intrusion at the northwestern boundary which blurs reading the block as a unit. So, the real impact on the district is an almost 20% diminution of total buildings, and additional damage to boundaries and setting.

2B-18

The City of Los Angeles is a CLG (Certified Local Government). This status is maintained through partnership with the State Office of Historic Preservation and has certain responsibilities to the protection of historic resources. Approval of this project is not consistent with the goals and intent of a CLG. Hollywood Heritage requests that no project approval be contemplated without inclusion of the State Office and the public in the future of this district. The project should be amended to include the removal of Building 2, rehabilitate 1771 and 1765 according to the Secretary of the Interior's Standards, and provide a policy to protect the district including listing as an HPOZ if appropriate. The developer has asked for demolition; that does not mean the City must grant that request. There is a viable project without encroaching into district boundaries.

More than the integrity of the individual resources, the geographic configuration of buildings is important in the history of the development of the neighborhood. The L shape configuration is a unique example of the underlying subdivision and agricultural patterns of early Hollywood. The DEIR states the loss of the two properties is less than significant because the other 13 contiguous properties remain; however, this negates the impact of the altered shape of the district. Therefore, the inclusion of these properties, despite their lowered integrity, is crucial to understand the significance of the district.

Hollywood now contains less than a half dozen of these working class historic districts. The latest survey has identified two, DeLongpre Park and McCadden-De Longpre-Leland which are themselves a subset of a formerly identified Colegrove District (2009 Chattel survey). Only Melrose Hill is protected with HPOZ status, while Afton/DeLongpre, Selma/LaBaig, and Vista del Mar/Carlos (while listed in the CA Register) and the DeLongpre Park and McCadden-De Longpre-Leland have no protections. The loss of these properties would set a dangerous precedent for the other vulnerable historic districts in Hollywood. Will the City also sacrifice the integrity of the Afton district with a proposed project on its western boundary? Just two years ago, the smallest, oldest, and most fragile enclave of turn of the century housing in the 1700 block of Hudson (identified as a district in surveys beginning in 1978) was lost. Fires paved the way for the demolition of two contributing structures in that block. Without those two contributors, the viability of a district was lost as they were a substantial percentage of the fabric and two of three remaining structures on one side of a small block.

2B-19

Every round of surveys over the past four decades has seen the identification of districts come and go. Districts identified in 1978, 1984, 2003, and 2009 no longer remain. With the demolition of individual buildings of the same era, Hollywood is rapidly losing any physical evidence of its development between 1900 and 1920, a key period in its history. What good is identification if there is no protection or plan for reuse? Study after study has mapped, placed resources in context, made recommendations for reuse, shown the economic benefits of incentives and planning. In one of the most significant portions of the city, this work has been ignored.

The district concept is an important tool in historic preservation. Hollywood Heritage has worked diligently to protect all of our districts from erosion. We have tried to tell the stories of each and to show how together they tell the story of Hollywood. A small residential district has a story to tell, but it is not the same story as Hollywood Boulevard's or a neighborhood commercial district. Resources are different in middle class and upper class subdivisions; subdivisions carved into the hills are different in character from those close to places of work in the "flats". Studio plants are irreplaceable. It is not

acceptable, in an area as vast as the Hollywood Community Plan, and in particular in the former Hollywood Redevelopment Area to say that each and every one of the few dozen districts cannot be protected. It is even less acceptable to have designated resources at risk.,The four tiny California Register Districts, two National Register Districts, and five HPOZs (one of which, Whitley Heights, is both an HPOZ and on the NR) deserve better. The handful of identified districts identified in the 1984, 2010, 2020 CRA surveys and in SurveyLA efforts deserve better. Yet Hollywood Heritage has received repeated demo requests in CA Register Historic Districts and repeatedly noted properties in California Register Districts should not be encroached upon. 30 years after these districts were identified, only Whitley Heights has adequate protection.

↑
2B-19

Some districts have been erased while others have been identified. No thought has been given to the type of district involved or the size and number of contributors which reflect working class housing. Therefore, there is no clear picture as to what the continued erosion of historic working class housing in districts is. Furthermore, overall demolition activities for individual resources of this type has been carefully documented by Hollywood Heritage and shows tremendous attrition of individual resources from the period 1900-1920.

Impacts on surrounding resources are minimized by the language in the DEIR. Despite the loss of the Little Country Church building, the property to the south is a listed Historic Cultural Monument and contains character-defining landscape features valuable to the public and of specific interest to Hollywood Heritage. This historic site also abuts the Vista Del Mar/Carlos district, and could be considered a feature of that district as well as having its own status. This piece of open space is rare in central Hollywood, and by its very existence shows our rural roots before the advent of the film industry. It will be that much more of an anomaly if the scale of the proposed project to the north is allowed to overwhelm it.

↑
2B-20

The EIR also assesses impacts of the proposed project on the eastern end of the Hollywood Boulevard Commercial and Entertainment District, with its contributing structures Pantages Theater and the Equitable Building bearing the brunt of dramatic changes in setting from outsize development. The issues of scale and compatibility with existing buildings are real. The Boulevard should not become the “hole in the donut” with massive development on all sides. The south side of the district at Argyle has already caused the demolition of three contributors to the district, which has resulted in a less defined commercial edge between Argyle and Vine.in this area. And, while the Walk of Fame is a resource identified in the DEIR, the linear nature of this resource and its removal from the proposed project is the only resource mentioned that may truly not be impacted by the project. Again, the nature of the resource needs to be explained. The Walk does not have the same characteristics as the Boulevard. Not all resources are alike. Therefore, they should not be reduced to numbers, but each valued for their own contribution.

No mitigation measures are identified in DEIR in regards to built historic resources. While HH understands that it is a particular convention of CEQA to not require mitigation if impacts are deemed insignificant, the impacts of this project on the district remain in reality. A true avoidance of impact would involve 1) retention and rehabilitation of 1771 and 1765 Vista del Mar; 2) vibration and settling mitigation for the properties on the west side of Vista del Mar; 3) preservation plan for the district which conforms to HPOZ guidelines; 4) design for Building I in conformance with the 1993 Urban Design Guidelines; 5) potential transfer of development rights on the district to the new construction.

↑
2B-21

The cumulative impacts of this project are grossly understated. The cumulative impact of development in the immediate vicinity (Hollywood Center, Yucca Street Condos, Hotel Argyle) as well as the 16 other projects identified in the surrounding area have been understated and this project continues the

↑
2B-22
↓

pattern. (See maps in Appx. I). Building I of this project is 20 stories. Hotel Argyle and Yucca Street Condos are each 16 stories high. The Hollywood Center Project would add a 46 building on the East project site, between Vine and Argyle.

The effects on nearby landmarks and a CA Register District are substantial. **Hollywood Heritage has 3D modeled the proposed buildings and will provide once the unrest is over.** FEIR must accurately identify as significant and adverse that the new project encroaches on the boundaries of a California State Register and National Register eligible District and destroys its historic setting. It also must address the cumulative impact of this project, the three others in the immediate vicinity, and 16 others in the surrounding area on designated historic resources including the Pantages and Equitable Building.

↑
2B-22

2. Land Use conflicts: zone change mysterious; land use process flawed unclear; adverse effects missed. The size of the developer’s “ask” has no justification. There is really no reason or justification for such an outsized project—why it can or should triple the development that is allowable by current plans and zoning (from a FAR of 2 to 6:1). The developer gets a \$28 million “gift” from the City!

|
2B-23

- Conflicts with existing land use plans: The DEIR omits necessary background and clear calculations that show genuine conflicts of the proposed Project with multiple land use plans. The DEIR cherry-picks a few “goals” on in Chapter IV, drawing a false impression of compliance. CEQA requires open disclosure of specific conflicts of the Project with these Plans in their entirety, especially those adopted for the purpose of avoiding mitigating environmental effect. As such the DEIR is deceptive, noncompliant with CEQA, requires recirculation, and incomplete.

- Change “D” Conditions to triple development size: The proposed Project is correctly stated to be entitled to FAR of 2 (new buildings are allowed to be 2x the land area owned)- - for all the land covered by Building I. Currently the land is commercially zoned for the west 19,679 sf parcel; and residentially zoned for the center 19,730 sf parcel. The “ask” is for removing the “D” (development limitation) placed by zoning ordinance to synch development to sustainable levels in Hollywood; to step buildings down between the commercial and low density residential area; and to stop any higher density unless Redevelopment restrictions to mitigate traffic and instill acceptable urban design were met.

|
2B-24

- Affordable housing: The project proposes demolition of 44 rent-stabilized residential units. It proposes to offer current tenants units in the new building at old rents; carry costs during construction for dislocated tenants; and reimpose rent control (RSO) on those units, plus the other 66 units which will start at market rents. This is good. However, this is not a guarantee of any affordability. The Redevelopment Plan ties requests for the FAR increase such as requested herein to public benefits and affordable housing—but this Project doesn’t provide.

|
2B-25

- R4 Zone doesn’t allow Hotel: The Zone Change proposed by the Project changes the C4 zone (intended to limit less desirable raucous uses like pool halls) to the LESS restrictive C2 zone on the West parcel. The residential R4-2D zone on the Center parcel (implemented in the Community Plan and AB 283 zoning to provide a buffer between dense commercial and low density historic district) does not allow a Hotel, so a Zone Change is being requested. C2 zoning reduces the allowed housing units, but there is no calculation and this isn’t disclosed. The DEIR omits clear discussion and quantification, and must be recirculated.

|
2B-26

- No code-required public benefits: This density “ask” can only be considered under the current Community Plan and the recently -transferred Redevelopment Plan if the project provides specific public benefits. This Project offers no such benefits.
- Exceeds Community Plan top density: The proposed development intensity appears to exceed the stated cap in both the Hollywood Community Plan (HCP)(80 DU/gross acre) and the Redevelopment Plan (HRP) 130 DU/acre, triggering a General Plan Amendment requirement. The DEIR omits all needed calculations to determine this.
- Hollywood Boulevard Urban Design Plan: The Hollywood Community Plan text requires that projects meet the objectives of the Hollywood Boulevard Urban Design Plan, which was a part of the Hollywood Redevelopment Plan Sec 506.2.1. One of these is “ensure that new development is sympathetic to and complements the existing scale of development”. Two of the other 5 objectives address the pedestrian experience. The project fails.
- Population and housing: By Hollywood Heritage’s calculations all of the housing projected until the year 2040 needed in Hollywood is already built or entitled.

2B-27

2B-28

2B-29

2B-30

Current Land Area and Development Allowable by Zoning:

				Allowable	Proposed
Building 2					
1765 N Vista del Mar	APN 5546-031-008	4,043.7 sf	*(Q) R3 IXL		
1771 N Vista del Mar	APN 5546-031-007	4,042.3 sf	*(Q) R3 IXL		
1779 N. Vista del Mar	APN 5546-031-027	2,855.9 sf	*(Q) R3 IXL		
	Total	10,941.9 sf	30' height limit	1200 sf lot area/DU 9 units	13 units 16,345 sf
Building 1					
6210-6218 W Yucca	APN 5546-031-031	17,360.9 sf	***R4-2D		
Sliver	APN 5546-031-031	2,367.0 sf	***R4-2D		
	Subtotal	19,729.9			
					225'
6220-6222 W Yucca,	APN 5546-031-031	17,339.6 sf	**C4-2D-SN		
Sliver	APN 5546-031-031	2,339.7 sf	**C4-2D-SN		197 units + 136 hotel ms
	Total	19,679.3 sf	75' height limit	39,358.6 sf 78,712 sf 1.8 acres	300,603 sf 225'
		50,351.1			DU/Acre?
	Buildable Area	48,022 sf			

2B-31

Sources: LA City ZIMAS for lot areas; Developer Pre-dedication and post dedication project figures from DEIR
 ** DEIR Use of LAMC Sec 12.22.A.18 for Hotel use cannot be applied on R4 portion of land, owing to zoning restrictions and

DEIR Error: LAMC 12.22.A.18 claims R5 densities can be attained, but that contravenes the Hollywood Community Plan, and the code section says “notwithstanding”

** “D” condition limits density to 2:1 FAR

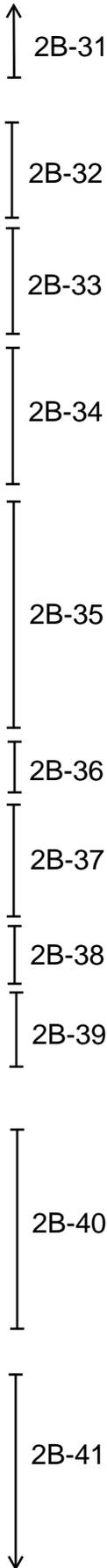
* Q Condition per Ord # 165,662 restricts density to 1,200 sf/DU

The FEIR must address accurately and transparently the following:

- *Land Use Plans conflicts a significant adverse effect: Either the conflict with Land Use plans is described and the DEIR recirculated, or the FEIR must conclude that the Land Use Plan conflicts are inadequately evaluated, and thus a significant adverse effect.*
- *Calculations: Table IV.H-6 must be revised and corrected to show real numbers, not the erroneous conclusion of “No Conflict”. Two scenarios must be shown—zoning PROPOSED (C2, etc) and the zoning EXISTING. The Table currently mixes up the two to cherry pick whatever is advantageous.*
- *Change of “D” Condition: In Hollywood, the “D” and “Q” conditions which this project seeks to remove were implemented to mitigate environmental effect, as evidenced in multiple documents accompanying Council adoption. Thus removing the “D” and “Q” conditions without analyzing the impacts they were mitigating must lead to DEIR revision, or an FEIR conclusion of significant adverse effect.*
- *Zone Change: FEIR must clarify the justification and effects for changing the zone from more restrictive C4 to less restrictive C2 uses—such as allowing a Hotel in a lower density residential zone, plus perhaps outdoor and rooftop bars if that is the reason. FEIR must acknowledge what is the accompanying adverse environmental impact; and put forth the necessary conditions and mitigation measures to control noise, glare, traffic, and public safety – whatever reasons customarily keep hotels out of residential zones. Amplified outdoor noise is a significant issue in Hollywood projects—and must be evaluated and mitigated. As noted above, the scrambling of current and proposed zones in the DEIR hides reality.*
- *Project Description to include detailed information on the site within the Vista del Mar/Carlos Historic District and urban design illustrations.*
- *Hollywood Boulevard Urban Design Plan: FEIR must include evaluation of the objectives AND specifics of the 1993 Plan., as expected as a part of the Hollywood Community Plan. As the project is not sympathetic to and complementing the existing scale of development, this should be explicitly recognized as a significant adverse effect*
- *Haul Route: If this EIR provides environmental clearance for a haul route, then the truck trips must be calculated and hauling’s effects on traffic, noise etc evaluated.*
- *Entitlements requests- where?: The Project Description should include the full listing and explanation of the entitlements and processes—such as Haul Routes or Site Plan Review—that this EIR will be used to justify. If we missed it- that’s what a rushed review period delivers.*

3. Redevelopment Plan obligations remain in force. The project’s impact must be itemized, evaluated, and added, with DEIR recirculated. The transfer of all land use responsibilities for this Project site from the Community Redevelopment Agency’s successor Designated Local Authority to the City of Los Angeles has taken place, and the DEIR was not updated or corrected to reflect reality. Analysis of conformance of this Project to the Hollywood Redevelopment Plan (HRP)—the major land use controls in effect for over 30 years in central Hollywood-- is notoriously missing from this DEIR!

This DEIR points to a June 2012 “Chris Essel memo” about the Argyle Hotel project as some kind of justification for “forgetting” about all the restrictions built into the Redevelopment Plan. This is very strange. The facts are that the Argyle Hotel was approved with all required CRA review, processing, and findings, and an OPA agreement when CRA was operating. The developer paid to mitigate traffic problems. While that approval had errors, at least the process was followed. It doesn’t parallel this situation; it “proves” nothing about this Yucca project; and isn’t the process today.



The argument the DEIR is trying to make, but fails, is that CRA-planned lots can be upzoned, changed, or have discretionary “gifts” to developers like this one run through City Planning without CRA involvement, findings, or processes. That wasn’t true whenever this EIR was written; isn’t true now; and even if everything requested by the Project is ultimately granted, conflicts with current planning must still be disclosed according to CEQA. The purpose of CEQA is to disclose the actual requirements, so the public and decision-makers can openly decide whether the 30 years of planning should be thrown down the drain or not.

2B-41

Not consistent with Redevelopment Plan: Land Use section fails to address the specifics of the Redevelopment Plan. Table IV-H.5 recites a few of the Plan goals, cherry-picked—to conclude this project complies. It doesn’t. A footnote on page IV.H-41 says “Approval of the project will require a finding of consistency with the Hollywood Redevelopment Plan.” It is not consistent. Specifically, the following govern permits:

2B-42

- Hollywood Core Transition District- Building 2
- Hollywood Boulevard District Urban Design Plan- Building 1

FEIR must address accurately and transparently the following:

- *Redevelopment Plan analysis and DEIR recirculation:* CEQA requires an accurate reflection of all applicable sections of the Hollywood Redevelopment Plan, not the goals. If goals are cited, then every goal must be analyzed. Citing goals and opining that they are met is inadequate. The goals for historic resources and procedures for protection are blindingly hidden. For example, the same Sec 506 of the Redevelopment Plan which allows considering a 6:1 FAR also mandates that the City monitor traffic and have a “moratorium” when Regional Center density reaches 2:1 FAR. Our calculations show that has happened.
- *Case Processing:* FEIR to identify City Planning procedures required for case processing under the Redevelopment Plan. This EIR can not be used to “clear” compliance with the Redevelopment Plan without first identifying the conflicts with it and the environmental effect if the Project is approved, and following all procedures
- *New Mitigation Measure:* Unless the FEIR and consultation with Hollywood Heritage produces a compliant redesign, new Land Use measure must be added to assume a significant adverse effect and require future of both buildings, design review in accordance with the Hollywood Urban Design Plan requirements and the Hollywood Core Transition District requirements must be carried out in this environmental review, or a significant adverse effect admitted.
- *Urban Design:* FEIR and project re-design must reflect minimum 20% affordable units as required by the Urban Design Plan, as well as a reduction of overall project size to a 4.5 FAR.
- *Hollywood Heritage review of demolition:* Please see our first response to the Historic Assessment in the Cultural Resources discussion.
- *Public Benefits:* FEIR must cite process, calculations, and required findings for a 6:1 FAR “ask”. Project must prove the absence of transportation/traffic effects as required by the Redevelopment Plan, not using VMT analysis, but LOS analysis so that the local gridlock is analyzed. Provide commitment to public benefits accruing to historic buildings—through a transfer of development rights— or other public mechanism or the development intensity cannot be considered.

2B-43

4. Aesthetics: FEIR must address accurately and transparently the aesthetic effect on historic resources.

2B-44

Building 2, proposed as infill to the Vista del Mar/ Carlos Historic District, would be a new addition to the

District must comply with Secretary of the Interior Standards for Rehabilitation # 8 and 10, which are more deeply explored in the National Park Service Preservation Brief #14. Preservation Brief #14 states that the building height is one of the most important aspects of compatibility: “A new addition should always be subordinate to the historic building; it should not compete in size, scale or design with the historic building.” However, Hollywood Heritage maintains that the demolition of 1771 and 1765 Vista del Mar is preventable, and that rehabilitation is the appropriate solution.

2B-44

Building I rises above its neighbors on the other corners of Argyle. By virtue of its scale and massing there is no attempt at compatibility with the neighboring district to the east. It will further block views to and from the hills, adding to the altered appearance of this section of Hollywood. See Appx. 2 for comparison of Building I against the 1993 Urban Design Guidelines.

5. **ELDP and Streamlining:** Certified as an “Environmental Leadership Development Project”, the Project qualifies under AB 900 of 2011, as amended by SB 743 (2013) and SB 734 (2016) and AB 246 to avoid or shorten the time for lawsuits. “Streamlining” under SB 375 means an accelerated timeline for the developer under CEQA.

The Project signed an agreement in 7/26/2017 with the State of California promising rapid production of jobs (by 2019) and great reductions in car use and greenhouse gasses. It appears that approval has expired, according to documents on the OPR website. The City Planning Department should require clarity if this has changed. Other projects must be finally approved by the City before January 1, 2021.

The DEIR does not reflect that the Project will indeed meet these requirements: who is responsible to monitor, and how results will be monitored. “Environmental Leadership” legislation offers protection from CEQA lawsuits before permits and construction, but the Project’s conformance with the developer’s promises happens during construction and operation Thus it is critical that the City condition the project visibly.

The FEIR should transparently describe these state-granted benefits and requirements; whether the developer in compliance with their requirements and deadlines; and clarify where in the EIR the conformance with the developer’s requirements is ensured.

2B-45

DEIR must be recirculated. FEIR should transparently disclose developer responsibilities

- *ELDP MMI:* Condition the Project with specific Project Design Features to implement the promises to the State, clarifying what City agency is monitoring: includes purchasing carbon offsets, paying prevailing wage rates, certifying LEED Gold or Silver required per law, etc and require that the Certificate of Occupancy is withheld if the Project does not successfully complete the promised measures, as required in the law
- *Energy Conservation Project Design Feature:* FEIR must show the unequivocal commitment to the State to achieve certification: “the applicant shall submit a binding commitment to delay operating the project until it receives LEED Gold Certification or better. If, upon completion of construction, LEED Gold Certification or better is delayed as a result of the certification process rather than a project deficiency, the applicant may petition the Governor to approve project operation pending completion of the certification process.” Due to the proponents delays, the current LEED version (not the 2014 version cited) must be required.
- *Traffic/Transportation:* Project transportation/traffic measures must ensure 15% improvement in transportation efficiency over comparable projects. All promised mitigations in TDM Program and vehicle parking promises made to the State must be formally incorporated in the Project

conditions, specifying the responsible agency, implementation procedure, and monitoring. The FEIR must identify any discrepancies between what was promised to the State and what will be provided.

- Greenhouse Gases: Project must have zero net increase in greenhouse gas emissions. The Project fails this requirement and commits to purchasing carbon offsets. The City of Los Angeles must clarify what legitimizes a seller of carbon offsets, and what the time frame is for complying first with the construction-related GHG emissions, and then with all the subsequent operational years. The damage to our atmosphere from this kind of construction happens now. Environmental Leadership is never evidenced in new high-rise construction, so a believable purchase of offsets is needed.
- Recognition of wastefulness of demolition

2B-45

6. Alternatives and Environmentally Superior Alternative- inclusion of a reduced density alternative that does not encroach on historic district boundaries.

Hollywood Heritage finds the Alternatives provided don't fully address the serious significant effects—some deriving simply because the analysis is missing from the DEIR, and some resulting from an erroneous conclusion.

- The DEIR offers no preservation alternative: An alternative which does not encroach into the identified boundaries of the historic district is essential to the evaluation of the project. There are still questions of appropriate uses and density, but without an alternative which protects the historic district, the DEIR is deficient.

- Maintain and rehabilitate the Vista del Mar Historic District: The loss of 1771 and 1765 Vista del Mar would irrevocably damage the integrity of the district. Hollywood Heritage sees no need to inflict further damage on an already fragile district. The project should be amended to include the removal of Building 2, rehabilitation of 1771 and 1765 Vista del Mar according to the Secretary of the Interior's Standards and provide a policy to protect the district including listing as an HPOZ if appropriate.

2B-46

- Improvement to Alternative 3: Alternative 3 appears to be environmentally superior as it is the only Alternative which stays within current zoning. This Alternative can be further improved by eliminating all significant effect on the Historic District from demolition (described above), new incompatible infill, parking podiums, shade, etc. from an altered Project Design. In alignment with the 1993 Urban Design Guidelines and Preservation Brief 14, the project can be redesigned to ensure compatibility with authentic its surrounds. Formal and overt Transfer of Development Rights plus compliance with State affordable housing incentives can justify some of the "asks" of the Project.

While this DEIR does not acknowledge the cumulative degradation of the historic setting due to the Hollywood Center, Yucca Street Condos Project, and Hotel Argyle in the immediate vicinity, compounded by the 16 other projects in the surrounding area, it doesn't need to make it worse.

Summary

For the last decade, Hollywood Heritage has worked tirelessly with City officials and departments to craft land use policies which protect historic resources. Three years ago, we asked the Council office to support us in a series of proposals designed to meet those goals and institutionalize policies that were readily accessible to developers and owners of historic properties. Among those policies:

- I. Adopt requirements from Section 511 of the Hollywood Redevelopment Plan into the Community Plan Ordinance:
 - a. Provide for the retention, reuse, and restoration of buildings and resources determined by the Agency to be architecturally or historically significant.
 - b. Deny requests for housing incentive units, developments in the Regional Center Commercial designation above a FAR of 4.5:1, and variations for sites on which a structure determined by the CRA to be significant was demolished after the adoption of the Hollywood Redevelopment Plan and for sites on which such a structure is proposed to be demolished. Exceptions to this are instances where a significant structure has been substantially damaged and must be demolished due to circumstances beyond the control of the owner, as well as applicable state law.
 - c. In order to provide incentives to preserve architecturally and/or historically significant structures, permit the unused density from architecturally and/or historically significant structures to be transferred to other development sites via a Transfer of Development Rights (TDR) program. Hollywood Heritage recommends a FAR of 6:1 for projects utilizing this TDR. Promulgate procedures for such a TDR program consistent with the procedures and requirements established in the Hollywood Redevelopment Plan (Sections 506.2.3, 505.3, and 521). While doing so, obtain adequate assurances that the building(s) from which the density transfer is taken are preserved and the development on the site to which the density is transferred will occur in conformity with: the Hollywood Redevelopment Plan, the objectives of special districts as established by the Plan, and (if applicable) any adopted Design for Development.
2. Establish regulations (D limitations) on parcels with historic resources to ensure appropriate review of design for resources. To ensure alterations to actual or eligible resources are made appropriately, require that rehabilitation conforms to provisions of a Hollywood Boulevard Urban Design Plan, Community Plan design guidelines, HPOZ Preservation Plan guidelines, Secretary of the Interior Standards, etc. Publish and enforce the Secretary of the Interior Standards as the design guideline for alterations to, rehabilitation of, or adaptive reuse of historic properties as well as for assessing impacts on historic properties (CRA requirement). Distribute the current Urban Design Plan to all new project applicants.
3. Identify conflicts between: (i) zoning maps (existing and proposed changes); (ii) specific zoning regulations and tools; and (iii) the preservation of historic and cultural resources, including signage, sign use, and sign parcels. Study communities within Hollywood, e.g. hillside neighborhoods and other single-home residential neighborhoods, to ensure appropriate regulations are applied to encourage within-scale development and preservation of built and natural resources. *See #6 above for use of D conditions.*
4. Establish zoning which conditions a project's use of FAR Incentives upon conformance with the Secretary of the Interior Standards for Rehabilitation.

2B-47

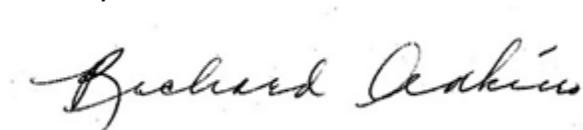
5. Implement a process to allow review by the Office of Historic Resources for projects impacting actual or eligible resources before the City Department of Building and Safety processes demolition requests
6. Prepare a publicly available Hollywood historic context statement to provide an understanding of the built environment.
7. Ensure all historic buildings with status codes ranging from #1 to #4 (prior OHP evaluation codes) within the Redevelopment Plan Area are registered as HCMs (CRA requirement from 1988).
8. Ensure that any residential area with survey-identified architecturally or historically significant structures be further planned to reduce allowable density, require compatible design, ensure adequate parking, and conserve the significant structures. *These include, but are not limited to, the districts listed under #17 below.*
9. Maintain and protect views and streetscapes that establish a context for historic buildings, structures, objects, sites, and zones, e.g., the Walk of Fame and Hollywood Sign. Establish an “historic streets” category to emphasize historic street patterns and major thoroughfares. Examples include: Hollywood Boulevard, Vine Street, Highland Avenue, Cahuenga Boulevard, etc.
10. Coordinate historic preservation and housing policies, encouraging the reuse of historic structures for affordable housing.
11. Promote renovation and reuse of historic structures as an environmentally-friendly alternative to demolition and new construction and as a catalyst for neighborhood economic development.

2B-47

Clearly, the City has not chosen to implement any of these recommendations. This proposed project is evidence that little guidance is given to developers when they submit a project that demolishes historic affordable/ workforce housing, impacts and erodes the integrity of the CA register district , and does not acknowledge the cumulative degradation of the historic setting due to the Hollywood Center, Yucca Street Condos Project , and Hotel Argyle in the immediate vicinity, compounded by the 16 other projects in the surrounding area.

2B-48

Sincerely,

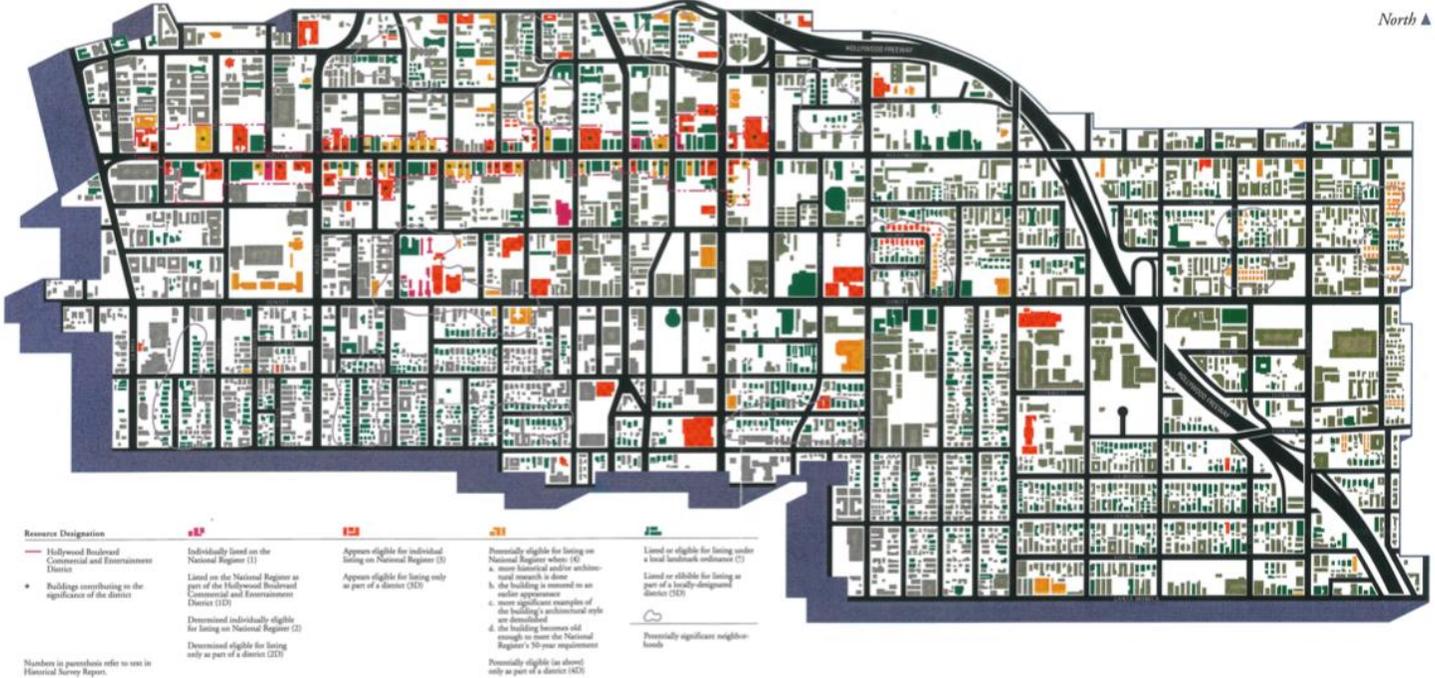


Richard Adkins
President, Hollywood Heritage, Inc.

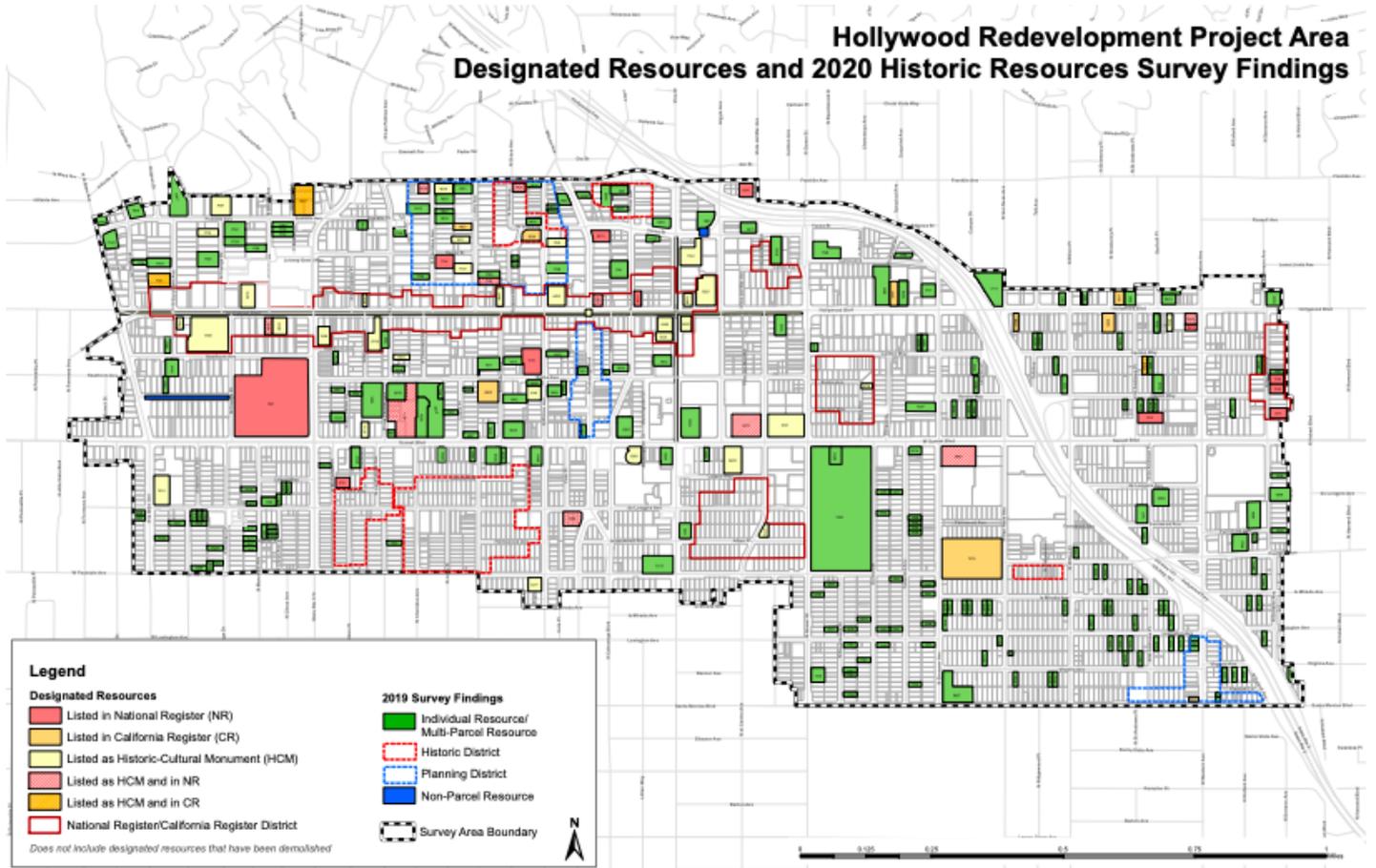
Appendix I: Maps (3)

Hollywood Historic and Architectural Resource Map

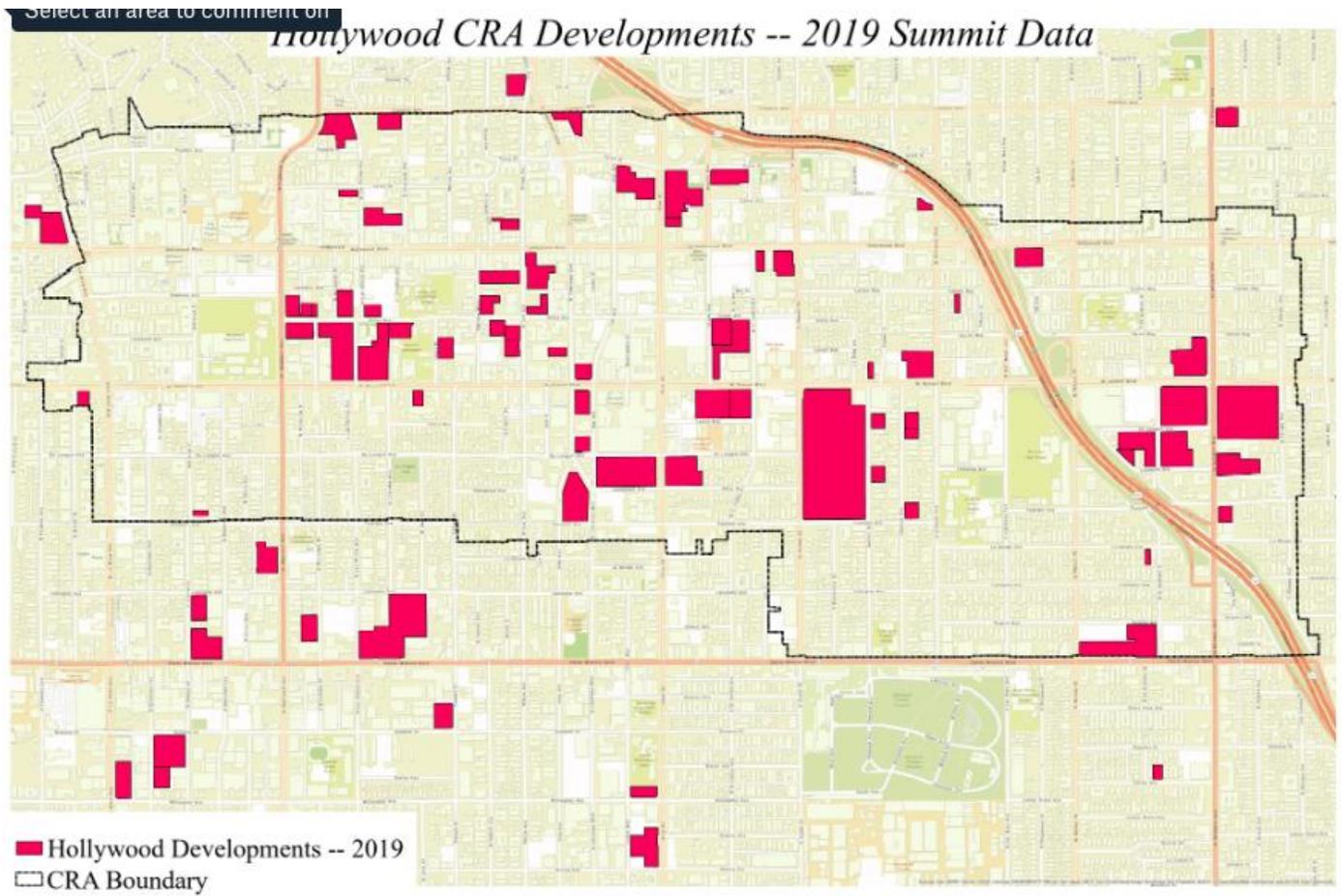
CRA/LA



CRA/LA Historic Resources Map



2020 ARG Historic Resources Survey Map



2019 Hollywood Heritage Development Map

Appendix 2: Conformance with 1993 Design Guidelines

Feature	1993 Design Guidelines	Proposed Design	Complies?
Density Standards (Section 3.3)	FAR of 3:1 with density bonus of up to 1.5:1 FAR in selected areas of Boulevard East and Boulevard West...with Agency approval if the developer or property owner provides public benefits such as rehabilitation of historic structures, affordable housing, live entertainment uses, and/ or off-site public open space. (p. 3-19)	6.6:1 FAR	No
Built Form Standards for Residential Mixed Use and Residential Land Use Areas - Modulation (Section 7.4.B)	Maintain small scale-built form pattern based which evolved based on the original parcelization... street facades should not exceed 100 feet in length unless separated by a 10 ft deep by 20 ft wide court or setback at each inhabitable level	Building 1- out of scale with district.	No
Facade Depth (7.4.B.3)	Each wall surface shall incorporate facade depth created through the use of individual windows set into the wall surface, facade surface breaks, shadow lines, articulation of edges, reveals, changes in material, ornament or similar architectural devices	Building 1- No individually set windows.	No
Height (7.3.A.2)	In Boulevard North and South and adjacent to areas of high density in Boulevard East and West, a 45--foot height limit rates to the existing low scale residential and commercial structures (additional height of up to 30 feet may be approved if certain standards are met.	Building 2- 255 foot tall.	No
Materials (7.5.A)	Stone, terra cotta glazed to resemble stone, brick, cementitious materials; the majority should be of opaque construction with individual windows; maximum surface areas of vision and spandrel glass shall be 60% of a building's surface area	Building 2- Glass, aluminum, metals.	No
Color (7.5.A)	Light color palette - earth tones, creamy pastels, highlighted by brighter and darker accent colors	White, gray	Yes
Glazing (7.5.B)	Use of clear glass is strongly encouraged but glazed areas should be differentiated in color from building's surface materials (7.5.B)	Building 1: insufficient differentiation	No

2B-49

LETTER NUMBER ORG 2B

		between glass and surface materials.	
--	--	--------------------------------------	--

↑
2B-49



Alan Como <alan.como@lacity.org>

6220 West Yucca Project DEIR

Jim Van Dusen <Jim@myhunc.com> Wed, May 20, 2020 at 8:54 PM
To: Alan Como <alan.como@lacity.org>, "councilmember.ofarrell@lacity.org" <councilmember.ofarrell@lacity.org>, "David Ryu (david.ryu@lacity.org)" <david.ryu@lacity.org>
Cc: George Skarpelos <George@myhunc.com>

Mr. Como, Attached please find the Hollywood United Neighborhood Council’s letter requesting an extension of time for public comment.

3A-1

Jim Van Dusen
Hollywood United Neighborhood Council
Area 2 Representative (Beachwood Canyon)
Chair: Planning and Land Use Management Committee
jim@myhunc.com
(213) 304-7410

 **20200517 HCP6220 Yucca extension request to DEIR.pdf**
185K

OFFICERS:

PRESIDENT	George Skarpelos
VICE-PRESIDENT	Tom Meredith
TREASURER	Adam Miller
SECRETARY	Erin Penner



BOARD MEMBERS:

Brandi D'Amore	Coyote Shivers
Fouzia Burfield	Ryan Snyder
Sheila Irani	Susan Swan
Margaret Marmolejo	Matt Wait
Adam Miller	Jim Van Dusen
Jeff Ramberg	Julia Eschenasy
Luis Saldivar	

HOLLYWOOD UNITED NEIGHBORHOOD COUNCIL
Certified Neighborhood Council #52
P.O. Box 3272, Los Angeles, CA 90078
Email:info@myhunc.com

May 17, 2020

To: Councilmember Mitch O'Farrell
Councilmember David Ryu
Alan Como, AICP, City of Los Angeles
Department of City Planning

Re: 6220 West Yucca Project Draft Environmental Impact Report (DEIR)
Case NO.: ENV-2014-4706-EIR

The Hollywood United Neighborhood Council's Board of Directors at their May 11, 2020 regularly scheduled meeting overwhelmingly voted to submit the following comment extension request:

In response to the release of the 6220 West Yucca Project Draft Environmental Impact Report (DEIR) that was made on April 23, 2020, we respectfully request that the comment period be extended to August 1, 2020 in light of the emergency shelter in place orders that are in effect and delay in setting up the protocols that will allow city agencies to function under the Brown Act. We understand the comment period for a Draft EIR is normally 45 days. However, we are in living in unprecedented times and Neighborhood Councils have been severely hampered from effectively gathering public input during the current pandemic.

This is a large project that will impact the immediate community and the 50 or so tenants whose potential homelessness will need to be addressed. In addition, a project of this scale will impact the extended community beyond Council Districts 13 and 4. Greater Los Angeles will be affected due to the development's proximity to crucial city transportation routes and the Hollywood Earthquake Fault Line.

In addition, there are myriads of other impacts that deserve a clear and transparent process which allows the community to weigh in on this matter, including the proposed mega-project Hollywood Center Project literally across the street from this project. These two projects will place an unprecedented strain on city resources and neighborhood safety and must be carefully and thoroughly vetted by the city departments and affected neighborhood groups and we request that you accommodate the community during these limited times of public interaction.

Sincerely yours,

Jim Van Dusen *
Chair, Planning and Land Use Management Committee

George Skarpelos *
President

*signed electronically

3A-2



Alan Como <alan.como@lacity.org>

6220 West Yucca DEIR- Responses and Comments from the Hollywood United Neighborhood Council - ENV-2014-4706-EIR

Jim Van Dusen <Jim@myhunc.com>

Sat, Jun 6, 2020 at 4:50 PM

To: Alan Como <alan.como@lacity.org>, "councilmember.ofarrell@lacity.org" <councilmember.ofarrell@lacity.org>, "David Ryu (david.ryu@lacity.org)" <david.ryu@lacity.org>, "vince.bertoni@lacity.org" <vince.bertoni@lacity.org>

Cc: George Skarpelos <George@myhunc.com>

Mr. Como, Attached please find the Hollywood United Neighborhood Council's comments and response to the [6220 West Yucca](#) Project DEIR and HUNC's prior submitted motion of 9/7/2016 regarding this project.

Jim

3B-1

Jim Van Dusen

Hollywood United Neighborhood Council

Area 2 Representative (Beachwood Canyon)

Chair: Planning and Land Use Management Committee

jim@myhunc.com

(213) 304-7410

2 attachments

 **20160907 HUNC Motion (Yata).pdf**
90K

 **20200604 HUNC Response to 6220 Yucca DEIR.pdf**
206K

ALOFFICERS:

PRESIDENT	George Skarpelos
VICE-PRESIDENT	Tom Meredith
TREASURER	Adam Miller
SECRETARY	Erin Penner



BOARD MEMBERS:

Brandi D'Amore	Coyote Shivers
Fouzia Burfield	Ryan Snyder
Sheila Irani	Susan Swan
Margaret Marmolejo	Matt Wait
Adam Miller	Jim Van Dusen
Jeff Ramberg	Julia Eschenasy
Luis Saldivar	

HOLLYWOOD UNITED NEIGHBORHOOD COUNCIL
Certified Neighborhood Council #52
P.O. Box 3272, Los Angeles, CA 90078
Email:info@myhunc.com

June 6, 2020

Councilmember Mitch O'Farrell
Councilmember David Ryu
Vincent P. Bertoni, AICP
Alan Como, AICP

Re: 6220 West Yucca
ENV-2014-4706-EIR

The Hollywood United Neighborhood Council's (HUNC) Board of Directors at their June 4, 2020 Special Joint Board and PLUM Committee Meeting voted to approve the following comments, questions and decisions regarding the 6220 West Yucca Project's Draft Environmental Report (DEIR):

1. We restate our dissatisfaction and concern with the blanket denial of an extension to review the DEIR in light of a pandemic, civil unrest, curfews and the size and complexity of this project. Allowing only 45 days is extraordinarily short and a denial of an extension flies in the face of most projects that come before the planning department. The project has been in the works for many years and an extension of 30-60 days is entirely appropriate and consistent with past Planning Department practices. The denial of the extension with a boiler plate denial seems to ignore widespread community concerns and demonstrates a lack of transparency needed for these types of projects.
2. The 6220 Yucca Street Project (Project) has agreed for all residential units to be RSO units. In addition, the Project has agreed to fund the difference in rents to those being displaced and to provide right of return to all residents affected to comparable units at the same rents they paid before. It also appears that they will pay moving expenses for those affected. Due to these extraordinary efforts on the part of the Project, the 6.6:1 FAR is agreeable as follows:
 - a. APPROVE: Zone changes:

3B-2

3B-3

3B-4

- i. West Parcel to C2-2D-SN with the D limitation amended to allow 6.6:1 FAR.
 - ii. Center Parcel to C2-2D with the D limitation amended to allow 6.6:1 FAR.
 - iii. East Parcel to R3-2D with the D limitation amended to allow 6.6:1 FAR.
- 3. APPROVE: Conditional Use Permit for FAR Averaging per LAMC Section 12.24-W-19.
- 4. Questions regarding the management of the financial reimbursements to the residents affected by the destruction of their residences due to this project:
 - a. It implies in the DEIR that the Project will pay for moving costs for tenants who elect to move to the Project, both out of their current residences and into the new residences. The September 7, 2016 HUNC motion specified that the Project would pay those expenses.
 - i. Has the Project included in their plans to reimburse tenants for moving expenses out of the old residences and back into the new residences?
 - ii. How will the Project determine the move-out and move back in allowances?
 - b. How will the temporary residential units be chosen (they need to be located close to the project as many of them work in that area)?
 - c. How will payment of the rent differential to senior citizens be managed in case the total amount affects the limits of any public assistance that they might be receiving?
 - d. What provisions will be made in the new apartments for senior citizens who may need and have had special accommodations in their prior residence?
 - e. What will be the mechanism and procedures by which the temporary rents will be funded by the Project?
- 5. Master Conditional Use Permit for Alcoholic Beverages and live entertainment/dancing:
 - a. What restaurants and bar(s) will be installed?
 - b. What will be the hours of operation?
 - c. What will be done to mitigate noise and public drunkenness that might result from patrons frequenting these establishments?
 - d. Will special events be allowed and if so, how many and of what kind?
- 6. Transportation: The Project due to its potential immediate and long-range impact on the traffic flow and traffic management in Hollywood, a crucial center of the Los Angeles transportation network, should:
 - a. Secure CalTran's input, determination and recommendations on the affects and remedies for the increased traffic flow that is planned for this project for the on and off ramps of the 101 Freeway (specifically, Gower Street, Cahuenga Blvd, and Argyle Street) in light of this project and the concurrent planned project to be built opposite this project on the corner of Argyle and Yucca streets (Hollywood Center Project).
- 7. Employee parking:
 - a. How many employees are anticipated working in the hotel, residential properties, restaurants and bar(s)?
 - b. What arrangements are being made for them to park their cars in non-residential areas if they drive to work?

3B-4

3B-5

3B-6

3B-7

3B-8

8. Construction:

- a. How will the Project guarantee public access to the sidewalks around the Project during construction?
- b. What arrangements will be made for construction workers to park in non-residential neighborhoods?

3B-9

9. Earthquakes: This project's extraordinarily close proximity to the Hollywood Fault Line is a serious safety concern. The EIR should include: an investigation into the project's determination that the fault line is inactive by an independent geological source; a review that the site is engineered to comply with AB1857; an analysis of California EPA guidelines for resiliency on water and waste water vis-à-vis this project, and a thorough investigation of the acknowledged blind thrust fault which the DEIR acknowledges could cause a 6.7 magnitude quake.

3B-10

10. Outdoor advertising signs: What provisions is the project making to ensure that there will be a prohibition on excessive lighting or electronic billboards or neon type advertisements that face north or west to the hill communities, or east facing that adversely impact the Griffith Park Observatory?

3B-11

11. What might be the potential impact on the Latino community in Hollywood due to the project's size and location and what plans are in place to mitigate any negative impacts?

3B-12

12. Has the project considered installing a Hollywood Visitor's Center on its top floor as a community service and to help drive more hotel business to the property?

3B-13

It is the continuing position of HUNC that securing affordable housing alternatives needs to be continuously investigated and implemented in Hollywood and anything that this project can do to help with this housing crisis should be pursued. Setting RSO rates at market rates will probably put the Project's units out of financial reach of much of the Hollywood population. Whatever this project can contribute to helping with this housing crises is important.

3B-14

Please see the attached September 7, 2016 HUNC Motion regarding this project and the promises made by the Project management.

3B-15

Sincerely yours,

Jim Van Dusen *
Chair, Planning and Land Use Management Committee

George Skarpelos *
President

*signed electronically

for Alan Como
1350

RECEIVED
CITY OF LOS ANGELES

JUN 03 2020

MAJOR PROJECTS
UNIT



● McQUISTON ASSOCIATES

6212 Yucca St, Los Angeles, CA 90028-5223

(323) 464-6792 FAX same

consultants to technical management

May 26, 2020

ENV 2014-4706-EIR plus Case File

ENV 2018-2116-EIR plus Case File

Statement of J.H. McQuiston on Projects "6220 West Yucca" and "Hollywood Center Project"

Honorable Eric Garcetti, Mayor;
Honorable City Administrative Officer;
Honorable Budget and Finance Councilmembers; and
Honorable Vincent Bertoni, Planning Director

Both Projects say the purpose of an EIR is to show the differential impact the Project will have on the City. This Statement concerns their differential impact on the City's finances, and questions the City's ability to survive if it allows these Projects to be built in the zone known to be seismically-hazardous.

Briefly Said

These Projects together will bring the City to financial-doom, per immutable State law. They put thousands of denizens and visitors to death, dismemberment, and unending trauma, on account of the inevitable Faulting far beneath them.

The catastrophe above is not only McQuiston's expert conclusion, but is also conclusions of those who have also seismically-studied the areas proposed to be re-re-developed with these projects.

After the Faulting catastrophe, by law those injured by the two projects' collapse will be entitled from this City a payment of \$876,170,000 per year; for 30 years the total will be \$20 Billion, 285 Million dollars.

City's payment is specifically-imposed by California's Alquist-Priolo Act, which the Projects admit is controlling for the properties¹, and it is also generally-imposed by the duty of the City to protect its people. There is no way the City may protect itself against the above payment if it allows the two Projects, as proposed, to be sited on their proposed locations. Read the City's liability in law yourself.

The above-liability² doesn't include City's similar indebtedness, arising because it already-allowed new construction to occur in recognized active-fault zones.

The City's primary responsibility is to safeguard its inhabitants from such a seismic catastrophe, and the City has the way to do so: reduce the population inhabiting a recognized-dangerous fault zone, like the Hollywood Fault, and prohibit construction therein which blocks persons from escaping damaged sites.

People will be trapped when doors jam. People may have to jump out of windows, and probably there will be no Firemen to catch them, or even to extinguish the blazes from ruptured lines. Also, the massive concrete water line beneath Franklin Ave, connecting Eagle Rock and Hollywood Reservoirs, will be crushed and cause the area to flood.

Human suffering will greatly exceed that of New York in "9-11" because these projects were built as-is.

¹ The City's boilerplate "builder is liable for damages" is over-ridden by the Act. The City may not callously-doom people by ignoring well-known fault dangers.

²The amounts above do not include building and accessory damages at the project sites.

4-1

4-2

McQuiston Associates

McQuiston Associates was founded in 1959 by J.H. McQuiston to be “all things to all men”. E.g, McQuiston invented the device which allowed the United States to develop-rapidly giant rocket engines and achieve “MAD”, ending the Cold War; subsequently those engines powered the United States to the Moon and beyond. McQuiston is cited as the reason Congress allows attorney fees if IRS unfairly attacks a taxpayer. McQuiston got the City to enact the City’s refuse-collection charge, thereby saving \$32 million a year for the General Fund. These illustrate the breadth of McQuiston’s work.

4-3

McQuiston, a graduate of Caltech and admitted to its “Honor society” (Tau Beta Pi), holds California license for Engineering. There he got training from inventors of seismic engineering, like Charles Richter, the creator of the Richter Scale. For many of his 90 years he continued there with meetings, seismic engineering, and ICBO issues among other topics.

For 60 years, both McQuiston Associates’ office and its manufacturing-plant are located atop the identified traces of the Hollywood and Santa Monica Faults. McQuiston thereby gained expertise about their seismicity.

Hollywood Fault

The EIRs factually-belittle the magnitude and danger of the underlying Fault-system, of which the Hollywood Fault is one part of it. The system begins East of Pasadena and extends West to and including the Channel Islands in the Pacific. That system has been described as partly “reverse”, because one side thrusts itself over or under the other side to varying extent, strongly-pushing against the hills to its North. The Los Angeles River ran through Cahuenga Pass before the upthrusts forced the river Eastward.

Caltech in lecture³ and print said the Hollywood Fault soon will “shake” with an amplitude of 6 feet, will “accelerate” with a magnitude of at least 1 “g”, and will have a magnitude of at least 7.5 with strong vertical component. A person will not be able to stand, nor dodge objects hurled at the person including walls and ceilings, during the lengthy seism. And, buildings like these will swing to destruction.

The Red Line subway investigation found the potential “rebound” of this fault to be about 30 feet. The “rebound” of the 1906 San Francisco quake was about 20 feet.

4-4

Typical “reverse” faults occurred years ago in Anchorage AK and in Kobe, Honshu. Japan has a seismic Code many times more-rigorous than the USA. Yet in both quakes building-floors “pancaked”⁴. Loaded floors pancaking may cause the entire building to collapse, akin to the collapses in New York City when “9-11” occurred.

“Reverse” faults are more-likely to elude simpleton’s searches by their very nature; moreover, they may be “blind”, buried deeply. *But they threaten peoples’ lives and they can be evaluated by appropriate tests.*

Comment on Subject EIRs’ Seismic Approach

The EIRs admit that the Hollywood Fault is present in the vicinity, and that the Fault is recognized as “active”. They admit the existence of the State’s Alquist-Priolo Act. The Act imposes a heavy penalty on governments’ allowing additional construction in active-fault zones.

4-5

To allow approval it follows that the developers must present facts proving the actual location of the Fault

³McQuiston was in Beckman Auditorium, Caltech, when a Caltech expert gave the public a lecture about imminent damage to properties near Hollywood and Vine, on account of the Hollywood Fault’s presence. A person there, who worked in the Taft Bldg. at Hollywood and Vine, asked what to do about working there, and the lecturer said, “Go to work late and leave early”. Residents can’t escape harm that way.

⁴The Valley quakes spawned vertical “shakes” of 2g. When a floor “pancakes” it falls on top pf the floor below, with more energy than its weight, usually causing the floors to “pancake” also. Ad infinitum. Persons have no time nor way to escape death.

and must prove its faulting will not bring harm to inhabitants of the proposed developments⁵.

The Developers’ researchers are apparently-certified for “petroleum geology”. McQuiston questions the propriety of their writing, facts, and conclusions as *seismic engineers*. There is no showing that the researchers are certified to calculate the amount of damage the Fault may cause to the developments. There are also no calculations in the EIRs in the seismic section, to justify their bizarre conclusions.

Developers *did not perform testing in the Fault Zone that would assess the actual danger to people inhabiting the proposed projects*. McQuiston witnessed their on-site activities. The investigators did not even determine the Fault’s actual location or its seismicity. Nor did they review the extensive Hollywood Fault’s trace-analysis performed slightly to the West in preparation for the Red-Line subway.

Totally absent, for example, is the famous Converse Foundation Engg’s wealth of facts about the Hollywood Fault developed for the Red Line subway⁶. And, totally absent from EIRs is the wealth of Reports from local Engineering Groups and Universities about the Fault and its location; those sources declared the Fault is an imminent danger to nearby inhabitants. If the EIRs had been done correctly, they *could not have concluded the seismic threat is so low that no mitigation is required*; they should have said the projects are *dangerous and should not be built in the proposed locations*⁷.

Also they artificially-shortened the length of the Fault System, perhaps to disguise its capacity for destruction. The “periods” of the buildings were not set forth. The Fault’s type wasn’t listed. There was no evidence the researchers found the Fault’s actual trace and its “dip”. Not going beneath the mountain of detritus left by earthmovers in the prior re-development, the report is totally-inadequate.

Nor is it proper for these EIRs to allege that if *one* type of active Fault that will kill people is present but *not specifically cited in law forbidding development thereon or nearby*, that a *development allowing the Fault to kill its inhabitants is entirely-proper* if the City lets the development proceed!

That is what the seismic report alleges. It puts the burden on the City to stop unsafe development without giving it facts, knowing that the City will bear the liability if the project “kills” the inhabitants.

Moreover, the EIRs put it to the City to inspect every detail of the site and Plans and Construction, warning that otherwise the development will not be safe and occupation will be a deathtrap. Developers thus use Alquist-Priolo as a sword against the City, a position which the City should not allow⁸.

McQuiston does not accuse the property-owners of such callous behavior, because they usually have no actual knowledge of seismic issues. Nor have City personnel charged with approving or denying developments. But people admitted to Engineering registration are sworn to obey the laws of City, State and Country and are required not to be so callous with people’s lives.

There are other defects in the Reports, but herein already is enough to get the Projects re-designed or relocated. But note also that for this amount of development, Yucca must be widened to 4 lanes plus parking from

↑
4-5
↓
4-6

⁵Young geologists have no idea what the subject area was like before the Hollywood Freeway was built. We old-timers remember Franklin Hill, which was leveled because the State declined to tunnel the freeway through it. Surrounding terrain is now devoid of geological accuracy.

⁶The Red Line’s SEIR contains a letter from City Engineer Morhar denying the Hollywood Fault is a hazard. Morhar ‘s allegations were ignored by the United States and the Red Line designers, who designed extra protection for travelers from the Fault’s measured- seismicity.

⁷Floors are not designed to stay intact under such massive vertical shaking as expected here. On the Anatolia Fault, modern designs became submerged with such shaking. A similar outcome will occur for these properties.

⁸ EIR: “There is a possibility of damage * * * if a moderate to strong shaking occurs as a result of a large earthquake”

Argyle to Gower, and Freeway ramps at Argyle and Gower require widening and signals.⁹

4-6

Calculating City's Eventual Liability

Liability is conservatively-calculated by amassing the number of people liable to be on the properties when the Fault lets-go, calculating their loss of incomes, life, and other effects on themselves and dependents, and calculating the time over which their livelihoods will be interrupted.

The number of people liable to be on the properties was calculated using McQuiston's experience in the neighborhood and throughout the City. McQuiston calculated 976 residents and 1457 visitors for "6220", and 3166 residents and 2366 visitors for "Center". The grand total is 7965 people present at the quake.

The properties will be very costly to inhabit, so inhabitants must be wealthy. McQuiston witnessed lawsuits awarding multi-millions in damages to wealthy people. Accordingly, McQuiston used for each person the average-award of \$110,000, without anything for costs or fees.

4-7

The time period for compensation will be long because the population in the buildings will be youth-skewed and permanently-"disabled". McQuiston used only 30 years for each person's compensation.

Thus the yearly assessment City *must pay* will be \$872,170,000. Yearly payments will last for 30 years. For just the two projects the *City must pay* \$24,285,100,000.

The City cannot pay that much without cutting almost 1/4 of each of its entire services for 30 years. At least 2,500 police will have to be let-go, and retirement benefits will require axing. The City's AAA Rating will vanish. Borrowing will become costly.

Think how much the City can accomplish with that sum if it does not allow the Projects as-is on those sites.

Alternatives

McQuiston is not saying the projects have no merit, but they require *safe location and strict inspection*. In this City there is too much failure to obey what the State imposes on the City regarding its General Plan. Developers now can pay the City a "bribe" and develop the City haphazardly, unlawfully, like these projects.

4-8

It is time to stop haphazard development, and the State and Courts repeatedly require the City to do that. Don't wait for the U.S. Department of Justice to act. Alquist-Priolo subject-areas are excellent places to begin.

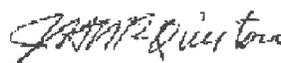
Conclusion

The City must reject the Projects as-proposed for these plots. They are only suitable for construction elsewhere.

4-9

Respectfully submitted,

McQuiston Associates



c: Interested parties

J. H. McQuiston, P.E.

⁹Already Yucca is blocked by trucks double-parking during long periods, on account of City's forgetting the requirement for an off-street loading place for the new Hotel at Yucca and Argyle. Yucca is now "double-double striped" for the exclusive benefit of that Hotel, meaning Yucca is impassible a substantial time of day and night. Any development on the South side requires widening the street.



Alan Como <alan.como@lacity.org>

Comments on DEIR for 6220 West Yucca Project

Dean Wallraff <dw@aenv.org>
To: alan.como@lacity.org
Cc: Kate Unger <ku@aenv.org>, Liza Brereton <Liza.Brereton@ahf.org>

Fri, Jun 5, 2020 at 12:11 PM

Mr. Como:

Please add the attached letter to the record for the 6220 West Yucca Project and add me to the interest list for that project, so I receive notices of hearings, etc.

Also, please reply to this email to acknowledge receipt.

5-1

Dean Wallraff
Attorney at Law
Executive Director
Advocates for the Environment
(818) 650-0030 X101
www.aenv.org

Yucca AEnv Comment Letter final.pdf
379K

June 5, 2020

Advocates for the Environment

A non-profit public-interest law firm
and environmental advocacy organization



Alan Como, AICP
City of Los Angeles, Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012

Via U.S. Mail and email to alan.como@lacity.org

Re: Comments on Draft Environmental Impact Report for 6220 West Yucca project,
Case No. ENV-2014-4706-EIR, SCH No. 2015111073

Dear Mr. Como:

Advocates for the Environment submits the comments in this letter on behalf of our client, the AIDS Healthcare Foundation (AHF), regarding the proposed 6220 West Yucca Project (the **Project**), to demolish 44 existing residential units and construct a mixed-use development within the Hollywood Community Plan area of the City of Los Angeles. We have reviewed the Draft Environmental Impact Report (DEIR) released on April 23, 2020, and submit comments during the public comment period ending on June 8, 2020.

The proposed Project includes a mixed-use development in two buildings of 20 and 3 stories, with a 136-room hotel, 12,570 square feet of commercial and restaurant uses, and 210 multi-family residential units. None of the residential units are planned to be affordable units.

The Project involves a zone change, a height district change, a site plan review, various conditional use permits, findings of consistency with the Hollywood Community Plan and objectives in the Hollywood Redevelopment Plan, a development agreement, an owner participation agreement, a vesting tentative tract map, and a haul route permit, as well as other discretionary and ministerial permits and approvals.

Demolition of Rent-Controlled Housing

AHF is opposed to demolishing rent-controlled housing. Because the Costa-Hawkins Rental Housing Act curtails the creation of new rent-controlled housing, such housing is gone forever once it is demolished. Even with potential future changes to Costa Hawkins, that would not itself create additional rent control locally in Los Angeles. It is inexcusable to demolish rent stabilized units. Currently, the Project site contains 43 residential units subject to rent control under the Rent Stabilization Ordinance (RSO). The disruption to current tenants is extreme and it is harmful to approve projects where existing vulnerable tenants live



5-2

5-3

when there are plenty of sites in Los Angeles that would not require the demolition of rent controlled housing. Even with a full right of return, described below, this project would cause a major and unnecessary disruption to tenants in rent-controlled units. The Applicant should find another site for this Project, where RSO units do not need to be demolished to make way for the Project.

↑
5-3

Treatment of Existing Tenants

If the Project constructs new units and they are subject to the RSO, as the DEIR says they will be (p. II-8), the Applicant may set the rents at market rate. (LAMC § 151.28.) This will price them out of reach of the existing tenants.

The DEIR states that “the Project would provide all onsite tenants a right of return to comparable units within the Project at their last year’s rent . . . plus applicable annual increases under the RSO.” (DEIR p. II-8.) But that right is illusory because it is not enforceable by the City or the tenants. It should be made enforceable by including it as a Condition of Approval. Since the Applicant is offering the right of return, the Applicant should be willing to agree to such a condition.

The DEIR also states that relocation assistance must be provided to existing tenants displaced when their units are demolished for the Project. (p. II-7.) But the assistance required by law is limited to 42 months, and Project construction could take longer than that. If this occurs, existing tenants will need to pay by themselves the differential in rent between what they’re paying now and the rent of the units they temporarily occupy during construction. If they cannot afford to pay the differential, they may be evicted and become homeless.

↑
5-4

The project description contains extremely little information about the anticipated construction schedule, which says only that construction may begin as early as 2020 with construction activities ongoing for approximately two years, and that full build-out and occupancy could occur as early as 2022 but would be dependent on final construction timing. While there are many unknowns in a construction schedule, the description does not provide essential information about the potential factors and likely effects of such factors, including an estimate of the longest time construction might last. This is problematic given the impact on current residents, because it fails to inform the public and decision makers about the potential length of time those residents might need to live somewhere else, and the potential for them to become homeless as a result of extended construction time.

Incomplete Project Description

The Conditions of Approval are an important part of the description of the Project, because they may limit the Project’s social and environmental impacts. Similarly, a Mitigation Monitoring and Reporting Plan is an important part of the project description, because it provides information on how mitigation will be ensured.

5-5

CEQA requires a stable and complete project description. As of this writing, Conditions of Approval, Findings, and a Mitigation Monitoring and Reporting Plan are not available on the Project’s Administrative-Record Web site. Without access to these documents, members of the public cannot adequately evaluate the Draft Environmental Impact Report, in violation of CEQA.

Demolition of Rent-Controlled Housing

The DEIR (p. II-8) states that the “Project would provide 100 percent of its 210 residential dwelling units as RSO units.” But the DEIR doesn’t state how this goal would be required. There is no representation that it will be required as a condition of approval. The RSO requires that units built to replace demolished RSO units be subject to the RSO (LAMC § 151.28 A), but allows the landlord to obtain an exemption to the RSO requirement if the units are affordable. (LAMC § 151.28 B.)

5-6

The change in the units’ RSO status is not itself an environmental impact under CEQA, but the increase in rents, either under the RSO’s provision allowing market-rate rents in the Project, or under the RSO exemption, may result in homelessness for existing tenants, which is an environmental impact under CEQA. CEQA requires the DEIR to analyze this potentially significant impact, but it does not.

Land Use

The DEIR claims that the Project is consistent with the applicable General Plan, but part of the Project site is designated Highway-Oriented Commercial. There is no definition of that land-use designation in the applicable portions of the General Plan—the Framework Element or the Hollywood Community Plan—so there is no basis for the DEIR’s contention that the Project is consistent with that land-use designation. The City thus abuses its discretion in finding the Project consistent with the General Plan.

5-7

Measure JJJ requires that, to be eligible for “any zone change or height-district change that results in increased allowable residential floor area, density or height” rental projects must provide a certain amount of affordable housing. (LAMC § 11.5.11.) This Project seeks such

changes, but provides no affordable housing, as that term is defined under Measure JJJ. The Project approval would therefore violate Measure JJJ.

5-7

Improper Labelling of Some Mitigation Measures as Project Design Features

The DEIR concludes some environmental impacts are not significant because of project design features (PDFs) included in the Project. This conclusion violates CEQA because many of the identified PDFs, rather than being features of the Project’s design, are in fact measures to reduce or eliminate environmental impacts. The City was required to evaluate the significance of impacts before mitigation and then analyze available mitigation measures and the selection of some and rejection of others. (See CEQA Guidelines § 15126.4(a)(1)(B).)

The PDFs that are in reality mitigation measures include, but are not limited to, PDF-AES-2, temporary construction fencing; PDF-AQ-1, green building measures; PDF-GHG-1, GHG emission offsets; PDF-GHG-2, 20% of code-required parking capable of supporting future EVSE; PDF-GHG-3, 5% of code-required parking equipped with EV charging stations; PDF-TRAF-1, construction traffic management plan; PDF-TRAF-2, pedestrian safety plan; and PDF-WS-1, water conservation measures.

5-8

The mischaracterization of mitigation measures as project design features is highlighted by the project design features identified for noise impacts. PDF-NOI-1 provides that generators used in construction will be electric or solar powered, while MM-NOI-2 provides for use of electric power cranes and other electric equipment during construction. PDF-NOI-2 prohibits impact pile drivers and blasting during construction, and MM-NOI-2 contains those same prohibitions among its requirements.

The Project’s GHG Impacts Are Significant, So All Feasible Mitigation Is Required

The DEIR correctly states the GHG emissions should be analyzed as cumulative impacts under CEQA. (DEIR p. IV.F-14.) The key issue is whether the GHG impacts are cumulatively considerable. There is a lower threshold for finding an impact to be cumulatively considerable than for finding that it is significant. The Project’s GHG impacts are cumulatively considerable. Therefore, CEQA requires all feasible mitigation measures to be adopted.

5-9

As discussed in the previous section of this letter, PDF-GHG-1 is really a mitigation measure. It requires off-site offsets, and off-site offsets have nothing to do with the Project’s design and therefore can’t be project design features.

One of the significance thresholds the DEIR adopted for GHG impacts is “Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?” (DEIR p. IV.F-45.) In support of its conclusion that the Project’s GHG emissions are not cumulatively considerable under this threshold, the DEIR analyzes consistency with the CARB 2017 Climate Change Scoping Plan, SCAG’s 2016-2040 RTP/SCS, and the City’s Green New Deal and Green Building Code. Despite the DEIR’s conclusion to the contrary, the Project is consistent with none of these documents.

The primary goal of the CARB 2017 Climate Change Scoping Plan (**2017 Scoping Plan**) is to reduce California’s GHG emissions 40% below 1990 levels by 2030. (Scoping Plan p. ES4.) The DEIR’s conclusion that the Project is consistent with the 2017 Scoping Plan is an important part of the DEIR’s analysis purporting to show that the Project’ GHG emissions are not cumulatively considerable.

Yet the DEIR contains no significant analysis showing the Project is consistent with the 2017 Scoping Plan. A quick comparison shows it is not consistent. The 2017 Scoping Plan calls for a statewide reduction of between 27% and 32% in transportation emissions. (2017 Scoping Plan p. 31.) But the Project will result in a net increase of 2,652 daily trips (Appendix L, Traffic Study, p. 2) and 11,929 vehicle miles travelled (VMT) (DEIR p. IV.L-45). The addition of a large amount of traffic is not consistent with statewide goals to reduce traffic by approximately 30%. This same critique of inconsistency is applicable in the areas of Residential and Commercial (building design), Electric Power, and Global Warming Potential (GWP).

The DEIR’s GHG analysis also suffers from the same defect the California Supreme Court faulted in the *Newhall* case (*Center for Biological Diversity v. Dept. of Fish & Wildlife* (2015) 62 Cal.4th 204), namely that the Project, to be consistent with statewide GHG-reduction goals, must do more than its pro-rata share because most housing in the state won’t be modified to reduce GHG emissions in the next ten years. New projects must bear a larger than average share of the reductions in order to be consistent with the 2017 Scoping Plan.

On December 5, 2008, the South Coast Air Quality Management District (SCAQMD) adopted guidance on CEQA GHG thresholds, including a screening level of 3,000 MTCO_{2e} for residential and commercial projects. ([http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2), p. 8.) The Project will emit 3,134 MTCO_{2e} (DEIR p. IV.F-82), which is higher than the threshold, so the Project’s emissions would be considered cumulatively considerable using the SCAQMD’s threshold.

Since GHG emissions are significant, the City must adopt all feasible mitigation measures. There are many possibilities, such as:

5-9
cont.

- Eliminating natural gas from the Project. Using all electric appliances for space and water heating and for cooking will progressively lower the Project’s carbon footprint as California increasingly obtains its electricity from renewable sources; it will also eliminate methane emissions from leaks, which will reduce the high-GWP (global warming potential) emissions.
- Solar panels and battery storage. The Project could obtain a substantial part of its electricity from solar panels, which could be backed up with battery storage on-site so the power generated on-site could be used at times when the sun is not shining. An advanced control system would allow electric vehicles to be charged from on-site batteries, or from the grid at times when overall usage is low, lowering the grid’s peak-hour requirements.

5-9

Inadequate Analysis of Air-Quality Impacts

The DEIR does not sufficiently analyze or mitigate air-quality impacts of the Project. Among its flaws, the DEIR does not adequately analyze operational air-quality impacts of the Project. The DEIR states that the operational emission estimates assume compliance with PDF-AQ-1, which includes increased energy efficiency features. The measures included in PDF-AQ-1 are measures designed to reduce operational emissions—in other words, they are mitigation measures. Therefore, the DEIR fails to present information and analysis about the potentially significant operational impacts without mitigation.

5-10

The DEIR also fails to adequately discuss or support the selection of significance thresholds for air-quality impacts, contrary to CEQA Guidelines section 15064.7.

Inadequate Analysis of Cultural Resources Impacts

The DEIR’s analysis of impacts to cultural resources is inadequate, including in its discussion of impacts to historical resources.

The Vista del Mar/Carlos Historic District is in the immediate vicinity of the Project site, and in fact two of its constituent parcels are within the Project site boundaries, with the residences on those parcels slated for demolition as part of the Project. The Vista del Bar/Carlos Historic District was determined to be eligible for the National Register of Historic Places, and—although the DEIR relegates this information to a footnote—is listed in the California Register of Historic Resources, and is therefore a historical resource under CEQA.

5-11

The DEIR’s analysis improperly concludes that there will be no significant impacts to the Vista del Mar/Carlos Historic District. First, the analysis concludes that 1765 North Vista

del Mar Avenue is not a contributor to the historic district, but that conclusion was not properly reached. The historic district was first recognized in 1984, and 1765 North Vista del Mar Avenue was identified as a contributor then, as it was in 1994 and in 2010. The DEIR claims that 1765 North Vista del Mar Avenue does not meet the criteria for eligibility as a contributor to the Vista del Mar/Carlos Historic District because it has been highly altered. But the alterations referenced occurred before the residence was identified as a contributor, and there is no basis for the DEIR's conclusion that now, just because a developer wishes to demolish the residence, it no longer is a contributor to the historic district.

The DEIR cannot rely on Public Resources Code section 5024.1(g)(4) to re-evaluate the historic district for purposes of the Project in a way that conflicts with the City's historic resources surveys, which have not determined that 1765 North Vista del Mar Avenue is an ineligible non-contributor. This includes both the 2010 and 2020 Hollywood surveys, both of which identified 14 contributors to the historic district, not 13, as stated in the DEIR.

Additionally, the conclusion that the Project will not cause a significant impact to the Vista del Mar/Carlos Historic District is based on a faulty analysis of impacts to the individual buildings without adequate consideration of the character of the historic district as a whole.

Lastly, the DEIR fails to support its conclusion that demolition of the residences at 1765 and 1771 Vista del Mar and their replacement with the Project would not result in the removal of any key physical characteristics of the district that convey its historical significance and justify its inclusion in the California Register or eligibility for inclusion in the National Register. The statement is not supported by analysis, so the DEIR lacks information showing the analytical route to the conclusion. Similarly, the analysis of compatibility between Building 2 and the historic district's buildings is conclusory and unsupported.

5-11

Inadequate Analysis of Hazardous-Materials Impacts

The DEIR omits analysis of hazards and hazardous materials, relying on the Initial Study's conclusion that the Project would have no potentially significant impacts in this area. But the Project involves demolition of structures built before 1953, which may contain asbestos or lead-based paint. Toxic dust from the demolition could affect people near the Project site. The Initial Study relied on regulatory compliance measures to reach the conclusion that any impacts would be less than significant, including impacts at the nearby Cheremoya Avenue Elementary School. In failing to discuss potential impacts from hazardous materials, including during the construction phase, the DEIR fails to provide information necessary to allow adequate evaluation of potential hazardous-materials impacts.

5-12

Inadequate Analysis of Transportation and Traffic Impacts

The DEIR's analysis of transportation and traffic impacts is flawed and fails to present sufficient, accurate information about potentially significant impacts.

The discussion of impacts under threshold (a) fails to adequately analyze the significance of the Project's impacts before implementation of PDF-TRAF-1, construction traffic management plan, and PDF-TRAF-2, pedestrian safety plan. The DEIR also incorrectly relies on PDF-TRAF-1 in its analysis of emergency access impacts.

The analysis of vehicle miles traveled (VMT) is insufficient and incorrect. The analysis is based on assumptions that are unsupported and inconsistent with information in other parts of the DEIR as to the Project's population. Additionally, the analysis omits consideration of VMT that would be generated by the Project, including some household VMT and work VMT, as well as VMT from hotel uses.

The DEIR concludes that the Project would result in a potentially significant impact for household VMT but that mitigation measure MM-TRAF-1, Transportation Demand Management Program, would reduce the impact to a less-than-significant level. The conclusion that MM-TRAF-1 would avoid significant impacts is unsupported by sufficient analysis or by substantial evidence, including because of the flaws identified above in the analysis of VMT generation.

Also, the DEIR fails to show that MM-TRAF-1 would be effective to avoid potentially significant impacts. Formulation of this mitigation measure is largely deferred to a time after Project approval, before issuance of a final certificate of occupancy, and the mitigation is uncertain. MM-TRAF-1 does not identify the exact measures to be implemented, and the effectiveness of transportation demand management programs varies widely, as the DEIR acknowledges.

One concern is that the DEIR concludes that with MM-TRAF-1, the household VMT per capita would be reduced from 7.4 to the identified impact threshold of 6.0, thereby reducing impacts to less than significant. Any errors of the analysis, including those mentioned above, call into question the conclusion that impacts will be less than significant with mitigation. Furthermore, the DEIR does not explain how MM-TRAF-1 would meet the threshold criterion of being 15% less than the existing average household VMT per capita for the Central Area Planning Commission (APC) area.

The DEIR's conclusion that the Project will not conflict with programs, plans, ordinances, or policies addressing the circulation system is insufficiently supported by analysis or substantial evidence. The reasons for this include the analytical flaws of the DEIR's VTM

5-13

calculations and discussion, as set forth above. For example, the analysis of consistency with Mobility Plan 2035 relies on MM-TRAF-1, which as discussed previously has not been shown to effectively reduce VMT impacts to below the Central APC area threshold and average VMT values, nor to reduce household VMT per capita to 15% below the existing average household VMT for the area.

5-13

Inadequate Analysis of Noise Impacts

The DEIR's noise analysis concludes that construction-related noise and vibration impacts will be significant and unavoidable but that operational impacts will be less than significant. The analysis and proposed mitigation are flawed in several respects.

First, the analysis of existing ambient noise levels at locations of noise-sensitive receptors is incomplete and undermines the validity of the DEIR's evaluation of noise impacts. The DEIR identified nearby residential uses on all sides of the Project site. Noise measurements were taken at five selected locations, but not at the location closest to the Project site, residences immediately south and east of the eastern portion of the Project site, and measurements at the locations selected were taken inconsistently, with some long-term measurements and some short-term measurements and no average hourly levels provided for some locations.

5-14

The DEIR's significance thresholds and analysis of significance of noise impacts are also flawed. The significance thresholds do not adequately capture noise impacts that are potentially significant. The analysis for both construction-related and operational impacts is undermined by the incomplete and faulty assessment of existing ambient noise levels.

The DEIR concludes that operational noise impacts would be less than significant, based in part on a conclusion that noise from outdoor/open space activity and loading dock and refuse collection areas, as well as moving trucks, would not exceed significance thresholds at receptor locations R3 and R4. As noted above, the selected locations do not allow adequate assessment of noise levels at residential uses adjacent to the Project site, undermining the validity of this conclusion.

5-15

The operational noise impacts analysis from parking structures also appears flawed, including because it assumes that only 7 trips are expected to use the entrance driveway to access Building 2 parking, a value that appears to be greatly underestimated given the population of that building. The proximity of that parking driveway to adjacent residential uses requires a more searching analysis.

5-16

The analysis of impacts from the emergency generator is also undermined by the faulty assessment of noise levels at sensitive residential receptors adjacent to the Project. These flaws

5-17

call into question the conclusion that proposed mitigation is sufficient to avoid potentially significant impacts.

↑
5-17

The analysis of composite noise level impacts is also weakened because as discussed above, each of the component noise sources appears understated, so the composite is also underestimated.

5-18

The DEIR's discussion of noise mitigation is also inadequate, in several respects. First, although the DEIR identifies some construction-related noise impacts—including cumulative impacts—as significant and unavoidable, the DEIR does not adequately discuss the feasibility of additional mitigation measures beyond those proposed, and does not provide information regarding the incremental benefits of increasing mitigation beyond that in the identified mitigation measures MM-NOI-1 through MM-NOI-5. For example, the DEIR states that MM-NOI-1 will not avoid significant noise impacts to upper floors of residential uses, but the DEIR provides no discussion of the effectiveness or feasibility of using additional or larger sound barriers or other methods to achieve a higher level of noise reduction. Also, the DEIR does not provide enough information to understand the level of mitigation offered by MM-NOI-2, which lacks standards for evaluating the success of the mitigation measure, and which contains uncertain and vague provisions. Nor does the DEIR provide sufficient information to evaluate the effectiveness or feasibility of mitigation measures MM-NOI-3 and MM-NOI-4 to address groundborne vibration impacts, or other mitigation measures that might further reduce these impacts, including those identified as significant and unavoidable.

5-19

Also, the DEIR does not sufficiently explain how the proposed mitigation measures will reduce construction and operational noise impacts to less than significant levels. Where analysis is provided regarding the amount of noise reduction from mitigation measures, such as for MM-NOI-5, the analysis is questionable, including because of the flawed selection of receptor locations. At other points, such an analysis is entirely lacking.

The Alternatives Analysis Does Not Comply with CEQA

The DEIR's analysis of project alternatives does not comply with CEQA and does not include alternatives that would preserve affordable housing or avoid demolition of the buildings that are part of the Vista del Mar/Carlos Historic District, despite a comment submitted in response to the Notice of Preparation requesting such an alternative to be included based on concerns that demolition of those homes may damage the integrity of the historic district. The DEIR fails to include discussion of why such an alternative was rejected or the feasibility of such an alternative.

5-20
↓

The DEIR does not provide an adequate evaluation, analysis, and comparison of the project alternatives and the proposed Project, including why the alternatives were rejected. For example, the DEIR's analysis of Alternative 2, a primarily residential mixed-use alternative, is rejected despite having overall less impacts than the Project, although it would provide more housing.

Additionally, the DEIR does not justify the selection of Project objectives, which are too specific to the Project and allow alternatives to be rejected despite their lesser environmental impacts. Specifically, the Project objectives include inclusion of a hotel, both in the underlying purpose and in objectives 1 through 3. The DEIR provides no explanation for why a hotel is needed, given that the area is well served by other hotels. In fact, comments in response to the Notice of Preparation included a concern about saturation of hotel uses in the Hollywood Community. Yet the discussion of Alternative 2 says that it would only partially be consistent with policies related to the provision of a hotel use, and that appears to be one of the reasons for rejecting the alternative in favor of the Project. The failure to explain why a hotel would be needed undermines the analysis, as does the failure to clearly state the reasons for rejecting this and other alternatives.

5-20

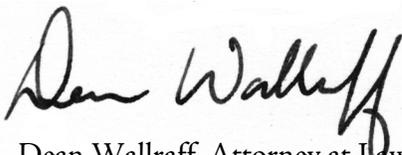
Conclusion

AHF opposes the 6220 West Yucca Project because it will have significant environmental impacts that are neither adequately analyzed nor sufficiently mitigated. The lack of proper environmental analysis is grounds for a court to set aside the DEIR and order the City to conduct environmental review that complies with CEQA.

5-21

The Project also displaces the existing tenants and destroys affordable RSO units, in an area of the city that is sorely lacking in affordable housing. It is one more example of gentrification and development for the sake of profit at the expense of Los Angeles's working-class residents. The City should deny the requested entitlements for the Project and instead pursue affordable housing developments that do not sacrifice existing RSO units.

Sincerely,



Dean Wallraff, Attorney at Law
Counsel for AIDS Healthcare Foundation



Alan Como <alan.como@lacity.org>

Notice of Completion and Availability for the 6220 West Yucca Street Project Draft EIR (ENV-2014-4706-EIR)

Susan Hunter <heysuzhunter@gmail.com>
To: Alan Como <alan.como@lacity.org>
Cc: Shauna Johnson <ShaunaJohnson@mail.com>

Mon, Jun 8, 2020 at 11:52 AM

Mr. Como,
Please see the attached. One is the DEIR written comment. The second is a letter for the administrative record.
Thanks you,
Susan Hunter

6-1

On Thu, Apr 23, 2020 at 9:28 AM Alan Como <alan.como@lacity.org> wrote:
[Quoted text hidden]

2 attachments

-  **Yucca Letter for Admin Record 06-08-2020.pdf**
1632K
-  **Yucca Response to DEIR.docx**
24K

To:

Alan Como, AICP
City of Los Angeles, Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012
Email: alan.como@lacity.org
Electronic Submission

From:

Yucca Association
6500 Sunset Blvd.
Los Angeles, CA 90028

06/07/2020

RE: Administrative Record/ CPC-2014-4705-ZC-HD-MCUP-CU-SPR and DEIR ENV-2014-4706-EIR/ 1756, 1760 North Argyle Avenue; 6210-6224 West Yucca Street; and 1765, 1771, 1777, and 1779 North Vista Del Mar Avenue Los Angeles, California, 90028

Mr. Como,

On behalf of the Yucca Association, we are asking for the following:

To date, no Plan for First Right of Refusal has been created for the tenants at the proposed project site. We are requesting that a condition of approval be applied to ensure an enforceable right to return to a newly constructed unit exists for the tenants. A similar condition of approval was also applied at the proposed Crossroads project as Condition #14, a copy of that letter of determination is attached.

We are asking for a real Plan to ensure the tenants have a pathway back to a newly constructed unit, and not a tent on the street. In order to ensure this, I am attaching a Plan for First Right of Refusal Under Full Demolition to demonstrate what the Plan should look like. We ask that the Plan be implemented in this case to ensure that all tenants are protected and that there is a clear, equitable, and enforceable right created.

Thank you for your time,

Yucca Association

6-2



LOS ANGELES CITY PLANNING COMMISSION

200 North Spring Street, Room 272, Los Angeles, California, 90012-4801, (213) 978-1300
www.planning.lacity.org

LETTER OF DETERMINATION

MAILING DATE: OCT 31 2018

Case No. CPC-2015-2025-DB-MCUP-CU-SPR

Council District: 13 – O'Farrell

CEQA: ENV-2015-2026-EIR; SCH No. 2015101073

Plan Area: Hollywood

Related Case: VTT-73568-1A

Project Site:	1540–1552 Highland Avenue	6700–6760 Selma Avenue,
	6663–6675 Selma Avenue,	6660 Selma Avenue,
	1543–1553 McCadden Place,	1542–1546 McCadden Place,
	1501–1573 Las Palmas Avenue,	1500–1570 Las Palmas Avenue,
	1600–1608 Las Palmas Avenue,	6665–6713½ Sunset Boulevard

Applicant: Bill Myers, CRE-HAR Crossroads SPV, LLC
 Representative: Kyndra J. Casper, DLA Piper, LLP

At its meeting of **September 13, 2018**, the Los Angeles City Planning Commission took the actions below in conjunction with the approval of the following project:

The Project retains and rehabilitates Crossroads of the World, the former Hollywood Reporter Building and the Bullinger Building and removes all other existing improvements on the Project Site to construct a mixed-use development on a 8.34-acre site in the Hollywood Community Plan Area. The Project (including existing uses to be retained within the Crossroads of the World complex and the uses to be included in the former Hollywood Reporter Building and the Bullinger Building) includes approximately 1,381,000 square feet of floor area, consisting of 950 residential units, 308 hotel rooms, and approximately 190,000 square feet of commercial/retail uses and a new above-ground parking structure on the eastern side of the Project Site. Included among the residential units are 105 dwelling units for Very Low Income Households, to replace the existing 82 residential units covered by the City's Rent Stabilization Ordinance. The proposed floor area ratio (FAR) is approximately 3.81:1 averaged across the Project Site. The Project results in a net increase of approximately 1,208,427 square feet of floor area on site.

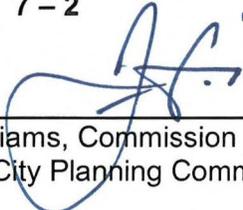
1. **Found**, based on the independent judgment of the decision-maker, after consideration of the whole of the administrative record, the project was assessed in the previously certified Crossroads Hollywood Project Environmental Impact Report (EIR) which includes the Draft EIR, ENV-2015-2026-EIR, SCH No. 2015101073, dated May 11, 2017, the Final EIR, dated May 4, 2018, and the Errata, dated August 2018, certified on September 13, 2018; and pursuant to CEQA Guidelines, Sections 15162 and 15164, no subsequent EIR, or addendum is required for approval of the Project;
2. **Approved**, pursuant to Section 12.22 A.25 of the Los Angeles Municipal Code (LAMC), a Density Bonus Compliance Review, reserving 11 percent, or 105 units, for Very Low Income Households, and utilizing Parking Option 1, with the following incentives:
 - a. An On-Menu Incentive to permit a 35 percent increase in the maximum allowable Floor Area Ratio (FAR) from 2:1 to 2.7:1 FAR (for the C4-2D-SN portion of the site and Parcel E1) and from 3:1 to 4.05:1 FAR (for the C4-2D portion of the site);

- b. An On-Menu Incentive to permit the averaging of floor area for an average FAR of approximately 3.26:1 across the site, density, parking and open space on two or more contiguous lots and permitting vehicular access from a less restrictive zone to a more restrictive zone; and
 - c. A Waiver of Development Standard (Off-Menu) to permit an approximately 16.51 percent increase of 3.8:1 FAR in lieu of approximately 3.26:1 FAR averaged across the site.
3. **Approved**, pursuant to LAMC Section 12.24 W.1, a Master Conditional Use to permit the on-site and off-site sale, dispensing and consumption of a full line of alcoholic beverages in connection with a total of 22 establishments associated with the Project's proposed hotel and commercial uses;
 4. **Approved**, pursuant to LAMC Section 12.24 W.18, a Master Conditional Use to permit eight uses with public dancing and live entertainment;
 5. **Approved**, pursuant to LAMC Section 12.24 U.14, a Major Development Project Conditional Use Permit for a project creating 250 or more hotel guest rooms, and 100,000 square feet or more of floor area in other nonresidential uses in the C4 Zone;
 6. **Approved**, pursuant to LAMC Section 16.05, a Site Plan Review for a project that would result in an increase of 50 or more dwelling units;
 7. **Adopted** the attached Conditions of Approval as modified by the Commission; and
 8. **Adopted** attached the Findings.

The vote proceeded as follows:

Moved: Khorsand
 Second: Ambroz
 Ayes: Choe, Mack, Mitchell, Perlman, Millman
 Nays: Padilla-Campos, Dake Wilson

Vote: 7 – 2



James K. Williams, Commission Executive Assistant II
 Los Angeles City Planning Commission

Fiscal Impact Statement: There is no General Fund impact as administrative costs are recovered through fees.

Effective Date/Appeals: *The decision of the Los Angeles City Planning Commission regarding the Off-Menu Waiver is not appealable.* The decision of the Commission regarding the remainder of the actions is appealable to the City Council within 15 days of the mailing of this determination letter. The filing of an appeal stays proceedings in the matter until the appellate body makes a decision. An appeal not filed within the 15-day period shall not be considered by the Council.

Appeals shall be filed on forms provided at the Planning Department's Development Service Center located at: 201 North Figueroa Street, Fourth Floor, Los Angeles; 6262 Van Nuys Boulevard, Suite 251, Van Nuys; or 1828 Sawtelle Boulevard, West Los Angeles.

FINAL APPEAL DATE: NOV 15 2018

Notice: An appeal of the CEQA clearance for the Project pursuant to Public Resources Code Section 21151(c) is only available if the Determination of the non-elected decision-making body (e.g., ZA, AA, APC, CPC) **is not further appealable and the decision is final.**

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

Attachments: Modified Conditions of Approval, Findings

c: Charles Rausch Jr., Principal City Planner
Heather Bleemers, Senior City Planner

CONDITIONS OF APPROVAL

As modified by the City Planning Commission September 13, 2018

Density Bonus Conditions of Approval

1. **Site Development.** Except as modified herein, the project shall be in substantial conformance with the plans and materials submitted by the applicant, stamped "Exhibit A," and attached to the subject case file. No change to the plans will be made without prior review by the Department of City Planning, and written approval by the Director of Planning. Each change shall be identified and justified in writing. Minor deviations may be allowed in order to comply with the provisions of the Municipal Code or the project conditions.
 - a. To reduce the heat island effect, pathways, courtyards, driveways and other paved areas shall ensure that a minimum of 50 percent of materials be used with a minimum initial solar reflectance value of 0.35 in accordance with the American Society for Testing and Materials standards (ASTM standards).
 - b. The project shall be constructed with an operable recycled water pipe system for on-site greywater use, to be served from onsite non-potable water sources such as showers, washbasins, or laundry and to be used as untreated subsurface irrigation for vegetation or for cooling equipment. The system specifics shall be required as determined feasible by the Department of Water and Power, the Bureau of Engineering, and the Department of Sanitation in consultation with the Department of City Planning.
2. **Residential Density.** The project shall be limited to a maximum of 950 residential units.
3. **Hotel Density.** The project shall be limited to a maximum of 308 guest rooms.
4. **Residential Automobile Parking.** Vehicle parking shall be provided consistent with LAMC 12.22-A.25(d) Density Bonus Parking Option 1, which permits one on-site parking space for each restricted affordable unit of 0-1 bedroom, and two on-site parking spaces for each restricted affordable unit of 2-3 bedrooms, for a minimum of 1,013 code-required parking spaces.
5. **Unbundled Parking.** Residential parking shall be unbundled from the cost of the rental units, with the exception of parking for residential units that are set aside for Very Low Income and workforce households.
6. **Bicycle Parking.** Bicycle parking shall be provided consistent with LAMC 12.21-A,16. Long-term bicycle parking shall be provided at a rate of one per dwelling unit or guest room. Additionally, short-term bicycle parking shall be provided at a rate of one per ten dwelling units or guest rooms, with a minimum of two short-term bicycle parking spaces. Short-term and long term bicycle parking for general retail stores and restaurants requires one bicycle parking per 2,000 square feet, with a minimum of two bicycle parking spaces for both long- and short-term bicycle parking. Based upon the number of dwelling units and commercial square footage, 1,048 long-term and 193 short-term bicycle parking spaces shall be provided on-site.
7. **Hotel Parking.** Vehicle parking shall be provided consistent with LAMC 12.22-A,4(b), for a minimum of 256 code-required parking spaces.

- 8. Commercial Uses.** The project shall be limited to 190,000 square feet of commercial uses. The use of the subject property shall be limited to those uses permitted in the C4 Zone as defined in Section 12.16.A of the LAMC.
- 9. Commercial Parking.** A minimum of 567 parking for commercial uses shall be provided. In the event that the commercial area is reduced, parking shall be provided in compliance with LAMC Section 12.21-A,4.
- 10. Floor Area Ratio (FAR).** The requested Off-Menu waiver of development standard allows for the Floor Area Ratio to be limited to a maximum of 3.8:1 averaged across the site.
- 11. Affordable Units.**

 - a. A minimum of 105 units, that is 11 percent of the 950 base dwelling units, shall be reserved as affordable units, as defined by the State Density Bonus Law 65915 (c)(1) or (c)(2).
 - b. Changes in Restricted Units. Deviations that increase the number of restricted affordable units or that change the composition of units or change parking numbers shall be consistent with LAMC Section 12.22-A,25.
 - c. Adjustment of Parking. In the event that the number of Restricted Affordable Units should increase, or the composition of such units should change (i.e. the number of bedrooms, or the number of units made available to Senior Citizens and/or Disabled Persons), or the applicant selects another Parking Option (including Bicycle Parking Ordinance) and no other Condition of Approval or incentive is affected, then no modification of this determination shall be necessary, and the number of parking spaces shall be re-calculated by the Department of Building and Safety based upon the ratios set forth pursuant to LAMC Section 12.22-A,25.
- 12. Calculation of Residential Density.** For the purposes of calculating the total number of dwelling units allowed at the site, any land required to be dedicated for street or alley purposes may be included as lot area.
- 13. Housing Requirements.** Prior to issuance of a building permit, the owner shall execute a covenant to the satisfaction of the Los Angeles Housing and Community Investment Department (HCIDLA) to make 105 units available to Very Low Income Households, for sale or rental as determined to be affordable to such households by HCIDLA for a period of 55 years. Enforcement of the terms of said covenant shall be the responsibility of HCIDLA. The applicant will present a copy of the recorded covenant to the Department of City Planning for inclusion in this file. The project shall comply with the Guidelines for the Affordable Housing Incentives Program adopted by the City Planning Commission and with any monitoring requirements established by the HCIDLA. Refer to the Density Bonus Legislation Background section of this determination.
- 14.** The applicant shall coordinate with the Department of City Planning, in consultation with the Council Office of District 13, to ensure that residents residing in the Courtyard Apartments located at 6200 Selma Avenue and 1535 Las Palmas Avenue are given first right of first refusal to return to a new unit once the proposed development has been constructed. Returning tenants, if qualified, shall be offered a unit reserved for Very Low Income Households. All other tenants shall be offered a new unit at a rate no higher than their last rent payment in their RSO unit. These requirements shall apply to a minimum of 40 units. The

applicant shall procure written approval of their first right of refusal plan from Council District 13 at the time of condition clearances.

Master Conditional Use Conditions

- 15.** The authorized use shall be conducted at all times with due regard for the character of the surrounding district, and the right is reserved to the Zoning Administrator to impose additional corrective Conditions, if, in the Administrator's opinion, such Conditions are proven necessary for the protection of persons in the neighborhood or occupants of adjacent property.
- 16.** All graffiti on the site shall be removed or painted over to match the color of the surface to which it is applied within 24 hours of its occurrence.
- 17.** Approved herein is the following: the sale and dispensing of a full line of alcoholic beverages for on-site consumption in a maximum of eighteen (18) proposed restaurants, including the pool deck and rooftop of the hotel (Type 47 – bona fide public eating place); the sale and dispensing of a full line of alcoholic beverages for on-site consumption within the hotel including meeting room and conference facilities for two (2) portable units and hotel minibars; the sale and dispensing of a full line of alcoholic beverages for on-site consumption in a maximum of two (2) proposed bars (Type 48 – General Public Premises); the sale of a full line of alcoholic beverages for off-site consumption at two (2) off-sale retail uses (Type 21 – off site general). The Type 47 restaurants may operate from 6:00 a.m. to 2:00 a.m. daily, with the sale of alcoholic beverages from 6:00 a.m. to 2:00 a.m., daily. The Type 48 bars may operate from 6:00 a.m. to 2:00 a.m., daily. The retail store/market may operate from 6:00 a.m. to 2:00 a.m. daily.
- 18.** Approved herein is a Master Conditional Use Permit for public dancing and live entertainment within any restaurant or bar within the hotel or within a maximum of eight restaurants/bars in the Project.
- 19.** Beer and wine sales may be sold in lieu of a full line of alcoholic beverages at any of the approved alcohol-serving venues.
- 20.** A public hearing for any Approval of Plans request may be waived at the discretion of the Chief Zoning Administrator.
- 21.** The Applicant or Operator shall not sublet the premises for any nightclub activity.
- 22.** No portion of the public areas of the project site shall be used exclusively for private parties in which the general public is excluded. This condition shall not prohibit the Applicant, Owner, or Operator from occasionally renting out portions of the public areas the project site for private parties if approved for a Special Event pursuant to Condition No. 27 below.
- 23.** No coin-operated games, video machines, pool or billiard tables are permitted unless approved by the Zoning Administrator as part of the Plan Approval for any specific venue located within the project site.
- 24.** Dancing and live entertainment shall be conducted subject to the issuance of a Dance Hall and Café Entertainment permit by the Police Commission, respectively, and as applicable for each individual approved establishment.

- 25.** Dancing and live entertainment shall be conducted in conjunction with the specific establishments identified in Condition No. 16 and 17 above of this grant, and not as a freestanding activity.
- 26.** Background ambient music is permitted in the outdoor portions of the project site that are under the control of the Applicant, provided it is not audible beyond the subject premises and shall not exceed the levels prohibited by the City's noise regulations (Section 116.01 of the Los Angeles Municipal Code). For the purposes of these operating conditions background ambient music will be defined as low-volume music that is complementary to dining experience. Recorded music will no longer be considered ambient when the volumes of the music interfere with activities such as dining and/or low volume conversation.
- 27.** Live entertainment and public dancing featured, endorsed, or otherwise provided in the public outdoor areas of the project site not covered by a Plan Approval, that are under the Applicant's control is prohibited except in those instances wherein the petitioner has secured LAPD Hollywood Vice approval to organize and provide a Special Event (see Condition No. 27 below) in the outdoor areas of the project site.
- 28.** The number of outdoor Special Events permitted on the subject property shall be limited to a maximum of 24 events per year. A Special event is any event which is held weekly, monthly or annually or that includes outside advertisement demonstrating a change in the mode and character of the normal project operations, including but not limited to hours of operation, any significant live entertainment or public dancing features, or any outdoor events that would stipulate an ABC one-day permit application or some other special endorsement. An event wherein the Applicant(s) or Operator charges an admission fee from patrons to any public portion of the project site will be considered a Special Events as will any events that involve the exclusion of the general public from gaining admission to any public portion of the project site. Special Event shall not include a farmers market, sidewalk sale or any similar type use of the project site. The Applicant or Operator shall seek approval from the Hollywood Vice Unit for all Special Events 14 days in advance of the date of each Special Event, in writing. Hollywood Vice Unit shall respond to requests for Special Events in writing. Outside advertisement as it pertains to this provision shall include any promotional material or notification commissioned by any entity that is not directly associated with the operation or under the direct employ of the applicant(s).
- 29.** Any ambient or amplified music, sound, vibration or noise emitted that is under the control of the Applicant or Operator shall not be audible or otherwise perceivable beyond the subject project site. Any sound, vibration or noise emitted that is under the control of the petitioner, which is discernible outside of the subject premises, shall constitute a violation of Section 116.01 of the Los Angeles Municipal Code, including any loud, unnecessary or unusual noise that disturbs the peace and quiet of any neighborhood or that causes discomfort. The petitioners shall make every effort to control any unnecessary noise made by project site and retail premises staff or any employees contracted by any of the project site facilities located within the properties developed by the petitioner, or any noise associated with the operation of the project site, the project site facilities, and/or equipment of the hotels, restaurants, bars and market.
- 30.** There shall be no use of the subject premises which involves Section 12.70 of the Los Angeles Municipal Code (Adult Entertainment).

- 31.** Smoking tobacco or any non-tobacco substance, including from electronic smoking devices, is prohibited in or within 10 feet of the outdoor dining areas in accordance with Los Angeles Municipal Code Section 41.50 B 2 C. This provision applies to all outdoor areas of the establishment that are used in conjunction with food service and/or the consumption, dispensing, or sale of alcoholic or non-alcoholic beverages.
- 32.** The Applicant(s) shall comply with 6404.5(b) of the Labor Code, which prohibits smoking within any place of employment. The applicant shall not possess ashtrays or other receptacles used for the purpose of collecting ashes or cigarette/cigar butts within the interior portions of any of the project site facilities/structures.
- 33.** Within six months of operation of each venue, all employees involved with the sale of alcoholic beverages shall enroll in the Los Angeles Police Department “Standardized Training for Alcohol Retailers” (STAR). Upon completion of such training, the applicant shall request the Police Department to issue a letter identifying which employees completed the training. The applicant shall transmit a copy of the letter from the Police Department to the Zoning Administrator as evidence of compliance. Employees shall attend the training on an annual basis.
- 34.** Security. Prior to issuance of a certificate of occupancy for any phase of the project, the Police Department shall have approved the Owner’s written plan for security for such phase and the project, including security equipment installed within such Phase and the balance of the Project, the type, number and hours of security personnel to be provided by the Owner, and coordination with the Police Department. A copy of the security plan approved by the Police Department shall be included with all Approval of Plans. The security plan for each phase shall include a camera installation plan. Surveillance cameras shall be installed which cover all common areas of the establishments, including all high-risk areas, entrances and exits to each tenant space, and including cameras that provide a view of the street. The Owner shall maintain a one-month tape library and such tapes shall be made available to Police or other enforcement agency upon request. The security plan for each phase shall include the type, number and hours of security personnel to be provided by the Owner. In addition to the private security staffing, the Owner shall provide for the hiring of Law Enforcement personnel as part of the security plan staffing for the project site during all hours of operation. Hollywood Vice Office and the Police Department reserve the right to revise the approved security plan for any phase of the project if it is determined by the Hollywood Vice Office that the security plan is ineffective or inadequate as it pertains to the safety of patrons, residents and/or the employees of the project site. If the plan is determined to be ineffective or inadequate, the Owner will submit a modified security plan to be approved by the Police Department.
- 35.** The project site security personnel/guards staffing the Security Plan shall not have any other duties other than those that are security related. Security personnel/guards shall be licensed in accordance with State Law and Police Commission standards and maintain valid Bureau of Security and Investigative Services Guard Credentials along with active first-aid credentials. Project site security personnel/guards shall be dressed in such a manner as to be readily identifiable as project site security personnel/guards to patrons, residents, visitor, employees and law enforcement personnel.
- 36.** The project site Law Enforcement staffing the Security Plan shall not have any other activities other than those that are security/law enforcement related. Law Enforcement personnel shall be employed in a uniformed capacity in accordance with State Law and Police Commission

standards. Project site Law Enforcement personnel shall be dressed in full uniform when employed to perform law enforcement functions on the project site.

37. Electronic age verifications device(s) which can be used to determine the age of any individual attempting to purchase alcoholic beverages or tobacco products shall be installed on the premise at each point-of-sale location. This device(s) shall be maintained in an operational condition and all employees shall be instructed in their use prior to the sale of any alcoholic beverage or tobacco product.
38. The Applicant and tenants shall monitor the areas under their control to prevent loitering activities. Loitering is prohibited on or around these premises and any area under the control of the Applicant.
39. The Applicant shall maintain on the premises, and present upon request to the Police or other enforcement agency, a copy of the Business Permit, Insurance Information, and valid emergency contact phone number for any Valet Service utilized and for any Security Company Service employed.
40. A copy of these conditions shall be maintained within each licensed premise. Additionally, a copy shall be provided to all employees who shall sign an acknowledgement form stating that they have read and understood all of the ABC and conditional use permit conditions. Said form shall be maintained at the location by the owner and /or manager who shall present it to Police personnel, ABC investigators, or any other City agency upon request. All licenses, permits, and conditions shall be posted in a conspicuous location at the subject establishment.
41. Prior to issuance of a certificate of occupancy for the earlier to be completed of (a) the second residential tower to be constructed on Parcel B of the Project (Building B-1 or Building B-3) or (b) the retail project on Parcel C (Crossroads of the World), the Owner shall make available up to 1,200 square feet (useable) to the Police Department for a substation. The substation shall be a shared facility for both Law Enforcement and private security. Once approved by the Police Department, the location and amenities of the substation shall be included in the security plan for the project. The Owner shall improve the Substation to the satisfaction of the Police Department.
42. A copy of the first page of this grant and all Conditions and/or any subsequent appeal of this grant and its resultant Conditions and/or letters of clarification shall be printed on the building plans submitted to the Development Services Center and the Department of Building and Safety for purposes of having a building permit issued.
43. **Master Plan Approval (MPA) Requirement.** Each individual venue shall be subject to a Master Plan Approval (MPA) determination pursuant to Section 12.24-M of the Los Angeles Municipal Code in order to implement and utilize the Master Conditional Use authorization granted herein for alcohol sales and/or public dancing unless otherwise noted. The purpose of the Master Plan Approval determination is to review each proposed venue in greater detail and to tailor site-specific conditions of approval for each of the premises including but not limited to hours of operation, seating capacity, size, security, live entertainment, the length of a term grant and/or any requirement for a subsequent MPA application to evaluate compliance and effectiveness of the conditions of approval.
44. Prior to the utilization of this grant, 24-hour "hot line" shall be provided for complaints or concerns from the community regarding the operation. The 24-hour phone number shall be

posted at the following locations: a) entries, visible to pedestrians; b) customer service desks, front desks or near the hostess stations. The applicant shall maintain a log of all calls, detailing: (1) date complaint received; (2) nature of complaint, and (3) the manner in which the complaint was resolved. This log shall be made available to law enforcement personnel upon request and presented as part of the application if and when a new application to continue the operation is submitted to the Department of City Planning. Complaints shall be responded to within 24 hours.

- 45. MViP – Monitoring, Verification and Inspection Program.** At any time, before, during, or after operating hours, a City inspector may conduct a site visit to assess compliance with, or violations of, any of the conditions of this grant. Observations and results of said inspection will be documented and used to rate the operator according to the level of compliance. If a violation exists, the owner/operator will be notified of the deficiency or violation and will be required to correct or eliminate the deficiency or violation. Multiple or continued documented violations or Orders to Comply issued by the Department of Building and Safety which are not addressed within the time prescribed therein, may result in denial of future requests to renew or extend this grant.
- 46.** Within 30 days of the effective date of this grant, a covenant acknowledging and agreeing to comply with all the terms and conditions established herein shall be recorded in the County Recorder's Office. The agreement (standard master covenant and agreement form CP-6770) shall run with the land and shall be binding on any subsequent owners, heirs or assigns. The agreement with the conditions attached must be submitted to the Development Services Center or the BESt (Beverage and Entertainment Streamlined Program) for approval before being recorded. After recordation, a certified copy bearing the Recorder's number and date shall be provided to the Development Services Center or BESt (Beverage and Entertainment Streamlined Program) for inclusion in the case file.

Site Plan Review Conditions

- 47. Public Improvements.** Prior to the issuance of any building permits, public improvements and dedications for streets and other rights-of-way adjoining the subject property shall be guaranteed to the satisfaction of the Bureau of Engineering, Department of Transportation, Fire Department.
- 48. Electric Vehicle Charging Stations.** The project shall include at least 20 percent of the total automobile parking spaces developed on the project site capable of supporting future electric vehicle supply equipment (EVSE). Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating ampacity. In addition, five percent of the total automobile parking spaces developed on the project site, and all parking spaces in excess of LAMC-required spaces for the use, shall be further provided with EV chargers to immediately accommodate electric vehicles within the parking areas. When the application of either the required 20 percent or five percent results in a fractional space, round up to the next whole number. A label stating "EV CAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.
- 49. Solar.** The Project shall provide a minimum of 135 kilowatts of photovoltaic panels on the Project Site, unless additional kilowatts of photovoltaic panels become feasible due to

additional area being added to the Project Site. The system shall be installed prior to the issuance of a certificate of occupancy.

- 50. Tree Maintenance.** All newly planted trees must be appropriately sized, staked and tied; provided with a watering moat; and shall be properly watered and maintained.
- 51. Tree Wells.** All areas containing trees shall be at minimum depth of 48 inches.
- 52. Graffiti Removal.** All graffiti on the site shall be removed or painted over to match the color of the surface to which it is applied within 24 hours of its occurrence.
- 53. Aesthetics.** The structure, or portions thereof shall be maintained in a safe and sanitary condition and good repair and free of graffiti, trash, overgrown vegetation, or similar material, pursuant to Municipal Code Section 91,8104. All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped and maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect to the satisfaction of the decision maker.
- 54. Trash/Storage.**
 - a. All trash collection and storage areas shall be located on-site and not visible from the public right-of-way.
 - b. Trash receptacles shall be stored in a fully enclosed building or structure, constructed with a solid roof, at all times.
 - c. Trash/recycling containers shall be locked when not in use.
- 55. Mechanical Equipment.** Any structures on the roof, such as air conditioning units and other equipment, shall be fully screened from view of any abutting properties and the public right-of-way. All screening shall be setback at least five feet from the edge of the building.
- 56. On-site Landscaping.** All planters containing trees shall have a minimum depth of 48 inches.
- 57. Lighting.** Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties, the public right-of-way, nor from above.
- 58. Signs.** There shall be no off-site signs for portions of the project that are outside of the Hollywood Signage Supplemental Use District (HSSUD). All signs within the HSSUD shall comply with the provisions of that district. All other signs are subject to the provisions of LAMC Section 14.4.
- 59. Parking Structure Design.**
 - a. Facades of parking structures shall be screened to minimize their visual impact on the public realm.
 - b. Parking and loading access shall be a minimum of 25 feet from a primary building entrance, pedestrian paseo or public plaza.

- c. Entrances, elevators and stairs for parking structures shall be easily accessible and highlighted architecturally.
- d. Any above ground parking structure shall be designed to be utilized and easily repurposed to other uses. The conversion of floor area from parking into new uses may be subject to additional discretionary actions.
- e. Above ground parking structures shall have flat parking levels, not including the driveway ramps.
- f. The height of the above ground parking levels shall have sufficient clearance to be adaptable to non-parking uses. Once converted, the building shall permit a minimum floor to ceiling height of 9 feet for commercial uses and 8 feet for residential uses.

Environmental Conditions

60. Mitigation Monitoring Program. The project shall be in substantial conformance with the project design features and mitigation measures in the attached Mitigation Monitoring Program (MMP), stamped "Exhibit B". The enforcing departments or agencies may determine substantial conformance with project design features and mitigation measures in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a project design feature or mitigation measure may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval, complies with CEQA Guidelines, Sections 15162 and 15164, including by preparing an addendum or subsequent environmental clearance to analyze the impacts from the modifications to or deletion of the project design features or mitigation measures. Any addendum or subsequent CEQA clearance shall explain why the project design feature or mitigation measure is no longer needed, not feasible, or the other basis for modifying or deleting the project design feature or mitigation measure. Under this process, the modification or deletion of a project design feature or mitigation measure shall not require a modification to any project discretionary approval unless the Director of Planning also finds that the change to the project design features or mitigation measures results in a substantial change to the project or the non-environmental conditions of approval.

61. Mitigation Monitor (Construction). During the construction phase and prior to the issuance of building permits, the applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of project design features and mitigation measures during construction activities consistent with the monitoring phase and frequency set forth in this MMP.

The Construction Monitor shall also prepare documentation of the applicant's compliance with the project design features and mitigation measures during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the applicant and Construction Monitor and be included as part of the applicant's Compliance Report. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the mitigation measures and project design features within two businesses days if the applicant does not correct the non-compliance within a reasonable time of notification to the applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

62. Tribal Cultural Resource Inadvertent Discovery. In the event that objects or artifacts that

may be tribal cultural resources are encountered during the course of any ground disturbance activities¹, all such activities shall temporarily cease on the project site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

- Upon a discovery of a potential tribal cultural resource, the project Permittee shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning at (213) 473-9723.
- If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Project Permittee and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
- The project Permittee shall implement the tribe's recommendations if a qualified archaeologist, retained by the City and paid for by the project Permittee, reasonably concludes that the tribe's recommendations are reasonable and feasible.
- The project Permittee shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist to be reasonable and feasible. The project Permittee shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.
- If the project Permittee does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist, the project Permittee may request mediation by a mediator agreed to by the Permittee and the City who has the requisite professional qualifications and experience to mediate such a dispute. The project Permittee shall pay any costs associated with the mediation.
- The project Permittee may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and determined to be reasonable and appropriate.
- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.
- Notwithstanding the above, any information determined to be confidential in nature, by the City Attorney's office, shall be excluded from submission to the SCCIC or the general public under the applicable provisions of the California Public Records Act, California Public Resources Code, and shall comply with the City's AB 52 Confidentiality Protocols.

Administrative Conditions

63. Approval, Verification and Submittals. Copies of any approvals, guarantees or verification of consultations, review or approval, plans, etc., as may be required by the subject conditions, shall be provided to the Department of City Planning for placement in the subject file.

-
- 1 Ground disturbance activities shall include the following: excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, pounding posts, augering, backfilling, blasting, stripping topsoil or a similar activity

- 64. Code Compliance.** Area, height and use regulations of the zone classification of the subject property shall be complied with, except where herein conditions may vary.
- 65. Covenant.** Prior to the issuance of any permits relative to this matter, an agreement concerning all the information contained in these conditions shall be recorded in the County Recorder's Office. The agreement shall run with the land and shall be binding on any subsequent property owners, heirs or assigns. The agreement shall be submitted to the Department of City Planning for approval before being recorded. After recordation, a copy bearing the Recorder's number and date shall be provided to the Department of City Planning for attachment to the file.
- 66. Definition.** Any agencies, public officials or legislation referenced in these conditions shall mean those agencies, public offices, legislation or their successors, designees or amendment to any legislation.
- 67. Enforcement.** Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Department of City Planning and any designated agency, or the agency's successor and in accordance with any stated laws or regulations, or any amendments thereto.
- 68. Building Plans.** Page 1 of the grant and all the conditions of approval shall be printed on the building plans submitted to the Department of City Planning and the Department of Building and Safety.
- 69. Corrective Conditions.** The authorized use shall be conducted at all times with due regard for the character of the surrounding district, and the right is reserved to the City Planning Commission, or the Director of Planning, pursuant to Section 12.27.1 of the Municipal Code, to impose additional corrective conditions, if in the decision makers opinion, such actions are proven necessary for the protection of persons in the neighborhood or occupants of adjacent property.
- 70. Indemnification and Reimbursement of Litigation Costs.**

Applicant shall do all of the following:

(i) Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void, or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.

(ii) Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.

(iii) Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the

nature and scope of action, but in no event shall the initial deposit be less than \$50,000. The City's failure to notice or collect the deposit does not relieve the applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(iv) Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(v) If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action, or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

For purposes of this condition, the following definitions apply:

"City" shall be defined to include the City, its agents, officers, boards, commissions, committees, employees, and volunteers.

"Action" shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims, or lawsuits. Actions includes actions, as defined herein, alleging failure to comply with any federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the applicant otherwise created by this condition.

FINDINGS

1. Density Bonus/Affordable Housing Incentives Program Findings

Pursuant to Section 12.22-A,25(g)(2)(i)(c) of the LAMC and Government Code Section 65915(d), the City Planning Commission shall approve a density bonus and requested incentive(s) unless the City Planning Commission finds that:

- a. The incentives do not result in identifiable and actual cost reductions to provide for affordable housing costs as defined in California Health and Safety Code Section 50052.5 or Section 50053 for rents for the affordable units.**

The record does not contain substantial evidence that would allow the City Planning Commission to make a finding that the requested incentive is not required to provide for affordable housing costs as defined in California Health and Safety Code Section 50052.5, which defines "affordable housing cost" having the same meaning as affordable rent as defined in Section 50053. Section 50053 of the California Health and Safety Code defines affordable rent, including a reasonable utility allowance shall not exceed 30 percent times 50 percent of the area median adjusted for family size appropriate for the unit for Very Low Income Households. Affordable housing costs are a calculation of residential rent or ownership pricing to not be less than 15 percent of gross income nor exceed 25 percent gross income based on area median income thresholds. The list of on-menu incentives in 12.22-A,25 were pre-evaluated at the time the Density Bonus Ordinance was adopted to include types of relief that minimize restrictions on the size of the project. As such, the City Planning Commission will always arrive at the conclusion that the density bonus on-menu incentives are required to provide for affordable housing costs because the incentives by their nature increase the scale of the project.

Pursuant to LAMC Section 12.22-A,25(f)(4)(i), a project qualifies for a percentage increase in the allowable floor area ratio equal to the percentage of Density Bonus for which the housing development is eligible, not to exceed 35 percent. The Project is setting aside 105 units for Very Low Income Households (11 percent). In exchange, the Project is eligible for a 35 percent Density Bonus (635 additional units). However, the Project is not utilizing the Density Bonus to provide additional units. Specifically, the Project Site lot area consists of 363,277 square feet, which would permit 1,816 units (363,277 square feet / 200 square feet, per LAMC 12.22-A,18(a)). With the additional units, the Project could provide up to 2,451 units (1,816 + 635). However, the Project is proposing 950 units. With the 11 percent set aside for Very Low Income Households, the project is eligible for two on-menu incentives. In this instance, the Project is seeking approval of an On-Menu Incentive to permit a 35 percent increase in the maximum allowable Floor Area Ratio (FAR) from 2:1 to 2.7:1 FAR (for the C4-2D-SN portion of the site and Parcel E1) and from 3:1 to 4.05:1 FAR (for the C4-2D portion of the site), and an On-Menu Incentive to permit the averaging of floor area for an average FAR of approximately 3.26:1 across the site, density, parking and open space on two or more contiguous lots and permitting vehicular access from a less restrictive zone to a more restrictive zone. The C4-2D-SN portion of the site and Parcel E1 permits a 2:1 FAR, and the C4-2D portion of the site permits a 3:1 FAR, resulting in a maximum floor area of 877,998 square feet. Approval of the On-Menu Incentive to permit a 35 percent increase in the maximum allowable FAR would permit a maximum floor area of approximately 1,185,297 square feet, which, in combination with the Waiver of Development Standard (Off-Menu) Incentive described below, would allow the construction of the Project. The increase in FAR will allow the mixed-use development to be built, allowing for the ground level retail around most of the Project's frontages. In addition, without the increased FAR there would be a reduction in the Project's ability to provide the range of unit configurations or a reduction in the marketable commercial area that will be

providing a commercial resource for on-site residents, visitors and community members in the neighborhood.

In addition, the Project is requesting an On-Menu Incentive to permit the averaging of floor area for an average FAR of approximately 3.26:1 across the site, density, parking and open space on two or more contiguous lots and permitting vehicular access from a less restrictive zone to a more restrictive zone. Pursuant to LAMC 12.22-A,25(f)(8), the Project may average the floor area on two or more contiguous lots because the Project includes 11 percent Very Low Income Household units (105 units) and all the proposed residential, hotel and commercial uses are permitted by the underlying C4-2D and C4-2D-SN Zones. Since the "D" Limitation limits FAR to 2:1 for the C4-2D-SN portion of the site and Parcel E1 and to 3:1 for the C4-2D portion of the site, when the floor area of the existing and proposed buildings is averaged across the Project with all off the On-Menu and Off-Menu Incentives, the average FAR of the Project Site will be 3.81:1. The Project also meets the requirements for averaging density pursuant to 12.22-A,25(f)(8), which would allow Parcel B of the Project Site to have sufficient density for the proposed residential units. Specifically, this averaging of density is necessary because Parcel A would allow 195 units, but is only proposing hotel and commercial uses. Similarly; Parcel C would allow 640 units, while Parcel E would allow 299 units, but neither will contain any residential uses. Parcel D, on the other hand, would allow 89 units, but only 76 are proposed. Finally, Parcel B would only allow 593 units, but is proposing 873 units. Therefore, the averaging of density is needed to allow the proposed number of units in Parcel B. The averaging of parking, for which the Project is eligible under the same requirements of LAMC 12.22-A,25(f)(8), is needed to distribute the parking across the Project Site; i.e., as shown in Exhibit A, through a combination of underground parking structures under Parcels A, B, C, D and a stand-alone parking structure in Parcel E. With the retention of the Las Palmas alignment, underground parking that had been proposed to go under and connect both Parcels B and C was eliminated, resulting in a reduction in the number of parking spaces under Parcel C. Therefore, 130 parking spaces that had been proposed under Parcel C were relocated to the standalone parking structure in Parcel E. The averaging of open space is also necessary in order to be able to accommodate the provided open space that would otherwise not be able to be physically located within each of the individual parcels that constitute the Project Site. The averaging of open space will allow for the provision of the publicly accessible courtyards and paseos, which are an important component of the Project. Finally, also pursuant to LAMC 12.22-A,25(f)(8), permitting vehicular access from a less restrictive zone to a more restrictive zone is necessary because of the two different C4-2D and C4-2D-SN Zones that comprise the Project Site. In order to allow the code-required vehicular access across the Project Site, vehicular access across contiguous lots from less restrictive zones to more restrictive zones is necessary.

Waiver/Modification of any Development Standard(s) Not on the Menu (Floor Area Ratio)

The requested Waiver of Development Standard (Off-Menu), which requests an approximately 16.51 percent increase of 3.8:1 FAR in lieu of approximately 3.26:1 FAR averaged across the site, are not expressed in the Menu of Incentives Per LAMC Section 12.22-A,25(f) and are not limited as to the number of requests that can be made. The Off-Menu provisions in LAMC Section 12.22-A,25(g)(3) state that that the decision-maker (City Planning Commission) shall approve a Density Bonus and requested waiver or modification of any development standard(s) unless the City Planning Commission, based on substantial evidence, makes either of the two findings set forth in LAMC Section 12.22-A,25(g)(2)(i)(c).

The requested incentives and waiver would result in building design or construction efficiencies that would physically allow the construction of the project that contains the permitted densities and incentives. The Project Site contains D Limitations that restrict FAR to 2:1 and 3:1. Because

the Project will retain historical resources on the Project Site, the amount of construction of new building envelope on some of the parcels is limited. Specifically, Development Parcel A will contain the hotel and ground floor retail. Development Parcel B will contain residential floor area, but the remainder of that parcel will contain the former Hollywood Reporter Building, which will be retained and rehabilitated, in addition to ground floor retail, the primary loading dock, and the open space paseo. The majority of Parcel C contains the existing Crossroads of the World buildings and Bullinger Building, which will both be retained and rehabilitated, and the courtyards and paseo between the historic Crossroads buildings. Parcel D proposes residential floor area with ground floor retail. The Project contains up to six subterranean levels throughout the Project Site but, because of the retention of the Bullinger Building, the Crossroads of the World complex and the retention of the Las Palmas Avenue alignment, parking which was originally proposed underneath those historical resources and Las Palmas Avenue was relocated to Parcel E. Under the existing allowable FAR, the Project would be limited to 877,998 square feet with the aforementioned Project Site conditions. The waiver request to permit an approximately 16.51 percent increase to 3.8:1 FAR allows the developer to expand the building envelopes on Parcels B and D so the affordable units can be constructed. The increase in FAR would also physically enable the Project to provide the commercial/retail spaces on the ground floor, while providing a mix of residential unit types, on-site parking and publicly accessible open space, resulting in total floor area of 1,381,000 square feet. The incentives and waiver support the applicant's decision to set aside 105 dwelling units for Very Low Income Households for 55 years.

There is no substantial evidence that the proposed incentive will have a specific adverse impact. A "specific adverse impact" is defined as "a significant, quantifiable, direct and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete" (LAMC Section 12.22-A,25(b)). The comments on record do not identify any written objective health or safety standards that are exceeded or violated. Nor does the record provide any evidence that significant, quantifiable, direct and unavoidable impacts will occur. Finally, pursuant to the CEQA clearance prepared for the project, substantial evidence supports that the project will not result in a specific adverse impact to public health or safety caused by physical impacts on the environment from the project. Therefore, there is no substantial evidence that the proposed project will have a specific adverse impact on public health and safety.

b. The Incentive will have a specific adverse impact upon public health and safety or the physical environment, or on any real property that is listed in the California Register of Historical Resources and for which there are no feasible method to satisfactorily mitigate or avoid the specific adverse impact without rendering the development unaffordable to Very Low, Low and Moderate Income households. Inconsistency with the zoning ordinance or the general plan land use designation shall not constitute a specific, adverse impact upon the public health or safety.

As required by Section 12.22-A,25(e)(2), the Project meets the eligibility criterion that is required for projects requesting on-menu incentives in that the Project: i) provides facade articulation through the use varying materials and architectural differentiation between the ground floor and upper stories of the buildings; ii) provides street orientation by including glazed storefront frontages along Sunset Boulevard, Highland Avenue, Las Palmas Avenue and Selma Avenue; iii) does not involve a contributing structure in a designated Historic Preservation Overlay Zone and, even though properties on the City of Los Angeles list of Historical-Cultural Monuments are included (the former Hollywood Reporter Building and the Crossroads of the World complex), is proposing to retain and rehabilitate those properties; and iv) is not located on a substandard street in a Hillside Area or Very High Fire Hazard Severity Zone, as recorded in the City's Zoning

Information and Map Access System. Therefore, there is no substantial evidence that the incentives for the Project will have a specific adverse impact on the physical environment, or on public health and safety, or on any property listed in the California Register of Historical Resources.

2. Section 12.24 of the LAMC Findings (Alcohol Sales, Live Entertainment and Dancing, and “Major” Development Project)

- a. The project will enhance the built environment in the surrounding neighborhood or will perform a function or provide a service that is essential or beneficial to the community, city, or region.**

Alcohol Sales and Live Entertainment and Dancing

The Applicant requested the approval of a Master Conditional Use to permit the on-site and off-site sales, dispensing and consumption of a full line of alcoholic beverages in conjunction with a total of 22 establishments associated with the Project’s proposed hotel and commercial uses, and to permit eight uses with public dancing and live entertainment. Based on the application, the Master Conditional Use is limited to 1) the on-site and off-site sale of a full line of alcoholic beverages and public dancing and live entertainment in conjunction with proposed hotel and commercial uses, specifically:

- A maximum of eighteen (18) proposed restaurants, including the pool deck and rooftop of the hotel (Type 47 – bona fide public eating place);
- The sale and dispensing of a full line of alcoholic beverages for on-site consumption within the hotel including meeting room and conference facilities for two (2) portable units and hotel minibars;
- The sale and dispensing of a full line of alcoholic beverages for on-site consumption in a maximum of two (2) proposed bars (Type 48 – General Public Premises);
- The sale of a full line of alcoholic beverages for off-site consumption at two (2) off-sale retail uses (Type 21 – off site general); and
- Public dancing and live entertainment within any restaurant or bar within the hotel or a within a maximum of eight restaurants/bars.

Each individual establishment is required to file an application with the Department of City Planning for and obtain an Approval of Plans, as conditioned by this grant.

The Hollywood Community Plan, page HO-2, states that “the focal point of the Community is the Hollywood Center, located generally on both sides of Hollywood and Sunset Boulevards between La Brea and Gower Street.” Therefore, the Project Site is located within the Hollywood Center. In addition, the Hollywood Community Plan, page HO-2, states that “this center area shall function as: 1) as the commercial center for Hollywood and surrounding communities and 2) as an entertainment center for the entire region.” The mixed-use Project includes hotel and commercial uses, such as restaurants and bars to encourage residents, hotel guests and employees to remain on-site to meet their retail and entertainment needs. In addition, the Project is located in a highly-urbanized area identified in the Hollywood Community Plan as an entertainment center for the

entire region where residents, visitors, tourists and employees that are within walking distance to the Project Site from various Hollywood tourist attractions. Adjacent residential areas will also be able to take advantage of the retail, hotel and entertainment services included in the Project. Specifically, the proposed project is located within the Regional Commercial Center in the heart of Hollywood, and, from its proposed hotel at the corner of Selma and Highland, is two blocks immediately south of the Hollywood & Highland complex and other entertainment destinations, which house multiple restaurants, theaters and bars. As the entertainment center of the Hollywood Community Plan Area, the project site and surrounding area are a destination for local workers, residents, visitors, and businesses, providing a 24-hour, seven days-a-week regional center of dining, entertainment, and activity.

The availability of alcoholic beverages and public dancing and live entertainment in conjunction with the project's hotel and commercial uses is a customary and incidental component of these uses. For example, restaurant patrons expect the ability to order alcoholic beverages in conjunction with food service. In addition, the ability to offer alcoholic beverages to patrons is essential in attracting top quality dining establishments, and bars to the project. Similarly, nightclub, restaurant or bar patrons expect the ability for public dancing and/or live restaurant. Alcohol service, dancing, and live entertainment are expected and required amenities to stay competitive with other nearby hotels such as Loews Hollywood and The Hollywood Roosevelt. The Project's commercial uses will serve as an attraction for visitors, tourists and neighbors in the area and will reduce the need for local residents to travel to other areas for dining and entertainment experiences. In addition, customers expect that retail uses will offer a full line of alcoholic beverages for purchase and consumption off the premises. The proposed restaurants and bar uses will provide desired food, beverage, and entertainment options for visitors to the Hollywood Center, as identified by the Hollywood Community Plan, and will help achieve the Community Plan's land use goals for this area as a commercial and entertainment center.

The Master Conditional Use permit provides an umbrella entitlement with conditions that apply to all establishments within the Project. Specific physical and operational conditions will be included as part of the Approval of Plans determination required for each establishment pursuant to the Master Conditional Use permit provisions. The proposed hotel and commercial uses, in conjunction with the imposition of operational conditions as part of the Approval of Plans, will provide a service that is essential or beneficial to the community.

"Major" Development Project

The findings for a "Major" Development Project Conditional Use Permit apply to a project creating 250 or more hotel guest rooms, and 100,000 square feet or more of floor area in other nonresidential uses in the C4 Zone. The Hollywood Community Plan, page HO-2, states that "the focal point of the Community is the Hollywood Center, located generally on both sides of Hollywood and Sunset Boulevards between La Brea and Gower Street." Therefore, the Project Site is located within the Hollywood Center. In addition, the Hollywood Community Plan, page HO-2, states that "this center area shall function as: 1) as the commercial center for Hollywood and surrounding communities and 2) as an entertainment center for the entire region." The proposed project will result in the redevelopment of Parcels A through E into a new unified mixed-use development with a hotel and having retail and commercial space that will help achieve the Hollywood Community Plan's goal for this area of Hollywood to be the commercial and entertainment center. Therefore, the Project helps perform a function or provide a service that is essential or beneficial to the community, City, or region. Specifically, the Project will provide the needed hotel rooms to meet the demand in the City generally, and within an area that is planned and zoned for such uses. The hotels in the immediate vicinity of the Project Site within the

Hollywood Center (Loews Hollywood hotel and The Hollywood Roosevelt hotel) provide a portion of the needed hotel rooms, and the project will contribute 308 guest rooms to help meet the demand, thereby supporting the larger capacity within Hollywood to serve as an entertainment center in the region. In addition, the Project will provide new retail opportunities to current and future residents, thereby benefiting the community and greater region, specifically by contributing toward and facilitating the City's long-term fiscal and economic viability by creating a total of approximately 190,000 square feet of commercial floor area. In addition, in order to help achieve the Hollywood Community Plan's goal for this area to be an entertainment center for the region, the Project will provide a 30,000-square foot entertainment venue and a 30,000-square foot movie theatre. As such, the project will perform a function and provide a service that is essential and beneficial to the community, city, and the region as a whole. In addition, the proximity of the Hollywood & Highland Red Line Station allows the project to function as a node connecting residents to the regional rail transportation network while providing high-quality space for a growing employment base and a destination for local residents and visitors. As such, the Project will perform a function and provide a service that is essential and beneficial to the community, City, and the region as a whole.

b. The project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.

Alcohol Sales and Live Entertainment and Dancing

The Hollywood Community Plan, page HO-2, states that "the focal point of the Community is the Hollywood Center, located generally on both sides of Hollywood and Sunset Boulevards between La Brea and Gower Street." In addition, the Hollywood Community Plan, page HO-2, states that "this center area shall function as: 1) as the commercial center for Hollywood and surrounding communities and 2) as an entertainment center for the entire region." Therefore, the Project Site is located in this center of the Hollywood Community Plan Area, which is envisioned as both the commercial center for Hollywood and surrounding communities and as an entertainment center for the entire region. Adjacent developments which support these goals are complexes such as the Hollywood & Highland commercial center, which is located two blocks to the northwest of the Project's proposed hotel, in addition to many restaurants and tourist locations located along Hollywood Boulevard and Sunset Boulevard. The project includes 950 residential units, a 308 guest room hotel, and 190,000 square feet of commercial uses, in line with the commercial and entertainment center goals of the Hollywood Community Plan. The proposed sale of alcoholic beverages and location of live entertainment and public dancing will be controlled within the bounds of the project site. The proposed restaurants, bars and retail uses will be desirable to the public convenience and welfare because they will help achieve the Hollywood Community Plan's vision for this area as the commercial and entertainment center of the Hollywood Community Plan Area. Outdoor courtyards fronting Sunset Boulevard and the courtyards and paseos around the Crossroads of the World and Development Parcel B will help activate the sidewalks along Las Palmas, McCadden Plan and Selma Avenue during the day and evening hours, contributing toward making this the entertainment center of the region. The bars and restaurants within the hotel and other buildings on the Project Site are in convenient locations that residents, visitors, and employees can patronize by walking, biking or taking public transit.

In addition, project design features identified in the EIR are imposed herein as conditions of this grant to further minimize potential impacts to the surrounding neighborhood. The grant also includes conditions that are generally recommended by the Los Angeles Police Department

(LAPD). In addition, these conditions will be supplemented by more specific conditions designed to address the characteristics of each individual establishment through an Approval of Plans determination. The additional conditions may include, but are not limited to security measures, hours of operation, seating, size and any other conditions that are intended to minimize impacts on surrounding uses. Under each review, the Zoning Administrator and LAPD have the opportunity to comment and recommend any conditions. The sale of alcohol is regulated by the State of California through the issuance of an Alcohol Beverage Control (ABC) license. ABC has the authority to impose further alcohol related conditions on the applicant. Thus, as conditioned, combined with the enforcement authority of ABC and LAPD, the approval for the sale of alcohol and the inclusion of live entertainment and public dancing within restaurant, bar and club establishments in the Project's hotel and commercial uses will not be detrimental to the public health, safety and welfare.

"Major" Development Project

The proposed Project will contain approximately 190,000 square feet of commercial spaces, primarily on the ground floor, and 308 hotel guest rooms. The Hollywood Community Plan, page HO-2, states that "the focal point of the Community is the Hollywood Center, located generally on both sides of Hollywood and Sunset Boulevards between La Brea and Gower Street." In addition, the Hollywood Community Plan, page HO-2, states that "this center area shall function as: 1) as the commercial center for Hollywood and surrounding communities and 2) as an entertainment center for the entire region." As proposed, the Project's location and commercial and hotel operations are compatible with the surrounding development that, as defined by the Hollywood Community Plan, make up the Hollywood Center, with an emphasis on this location as a center for both commercial and entertainment functions. This is evidenced by the highly-urbanized and dense entertainment and tourist attractions along Hollywood Boulevard that are only 2 blocks to the north of the Project's hotel, proposed at the corner of Highland Avenue and Selma Avenue. The Project's proposed 190,000 square feet of commercial area would be compatible with these existing uses, consistent with the Hollywood Community Plan's goal to make this area a commercial center. The approval of the Conditional Use Permit will not adversely affect or further degrade adjacent uses or properties because it enables the development of uses that help achieve the Hollywood Community Plan's goal to make the Hollywood Center a commercial and entertainment center. For example, the Project's proposed 308 hotel guest rooms will be complementary to the nearby Loews Hollywood hotel and The Hollywood Roosevelt hotel. In addition, the development of a mixed-use project with a hotel component at this site will redevelop the site and will enhance the pedestrian experience along the adjoining public rights-of-way, consistent with recently approved projects already under construction or recently completed in the immediate area along Selma Avenue (i.e., 1600 Highland Avenue, 1601 Las Palmas Avenue). Finally, the Project's proposed entertainment uses – specifically, a 30,000-sf entertainment venue and 30,000-sf movie theatre – are compatible with the Hollywood Community Plan's vision for this area as an entertainment center for the region.

The project's proximity to Metro's Hollywood & Highland Red Line Station and other transit connections will reduce vehicle miles traveled, thereby reducing air pollution. In addition, the proximity of the Red Line Station allows the project to function as a node connecting residents, hotel guests and tourist to the regional rail transportation network while providing high-quality commercial space for a growing employment base and a destination for local resident, tourists and visitors to find neighborhood-serving amenities. Therefore, the project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.

c. The project substantially conforms with the purpose, intent and provisions of the General Plan, the applicable community plan, and any applicable specific plan.

Alcohol Sales and Live Entertainment and Dancing

There are eleven elements of the General Plan. Each of these Elements establishes policies that provide for the regulatory environment in managing the City and for addressing environmental concerns and problems. The majority of the policies derived from these Elements are in the form of Code requirements of the Los Angeles Municipal Code. The Land Use Element of the City's General Plan divides the city into 35 Community Plans. The Hollywood Plan Community Plan Map designates the property for Regional Center Commercial land use with the corresponding zones of C2, C4, P, PB, RAS3, and RAS4. The project is consistent with the underlying C4-2D-SN and C4-2D Zones, which are intended to provide for commercial uses, including residential uses. The Hollywood Community Plan text is silent with regards to alcohol sales. In such cases, the decision-maker must interpret the intent of the plan.

The sale of a full line of alcoholic beverages and live entertainment/public dancing in conjunction with the proposed commercial and hotel uses are consistent with the following objectives of the Community Plan:

Objective No. 1: To further the development of Hollywood as a major center of population, employment, retail service and entertainment.

Objective No. 4: To promote economic well-being and public convenience through allocating and distributing commercial lands for retail service and office facilities in quantities and patterns based on accepted planning principles and standards.

The Community Plan encourages new uses which strengthen the economic well-being and promote development of Hollywood as a major center of population, employment, retail service and entertainment. The project is located within the Hollywood Center, as identified by the Hollywood Community Plan, which includes Hollywood attractions such as the Hollywood & Highland complex, the Hollywood Walk of Fame, TCL Chinese Theatre, Dolby Theatre, etc., promoting visitors to Hollywood for business, entertainment events such as the Academy Awards, and tourism. Objective No. 4 also encourages the promotion of retail service, and the Project will provide restaurants and bars and with alcohol sales and live entertainment and public dancing to further the existing pockets of activity with the heart of Hollywood. The request achieves the objectives of the Hollywood Community Plan, which seeks to promote the development of Hollywood as a major center of population, employment, retail service and entertainment, and that promotes the economic well-being and public convenience through allocating and distributing commercial lands for retail service.

"Major" Development Project

The Project is located in the Hollywood Center of the Hollywood Community Plan Area, which is dominated by a mix of commercial and entertainment uses. The area is a thriving tourist attraction. The ultimate objective of the Community Plan is to "to further the development of Hollywood as a major center of population, employment, retail service and entertainment." The project substantially conforms with this objective of the Community Plan as it will result in the development of a high density, transit-oriented mixed-use development that will provide much needed hotel rooms, and commercial uses that will serve the adjacent Hollywood tourist

entertainment uses. The project also advances the goals and policies of the Community Plan by providing significant employment opportunities from the retail uses for the community. Specifically, the development of the project is consistent with and will advance the following objectives of the Community Plan:

Objective No. 1: To further the development of Hollywood as a major center of population, employment, retail service and entertainment.

Objective No. 4: To promote economic well-being and public convenience through allocating and distributing commercial lands for retail service and office facilities in quantities and patterns based on accepted planning principles and standards.

The project is consistent with and advances the above objectives because it will add 308 hotel rooms and 190,000 square feet of commercial uses to the Community Plan Area. The addition of these guest rooms will address the needs of all the visitors to Hollywood for business, entertainment events, and tourism. In addition, the Project will provide a 30,000-sf entertainment venue and a 30,000-sf movie theatre. The project's location within the Hollywood Center and proposed commercial and entertainment uses will help achieve the Hollywood Community Plan's goals for this area as a commercial and entertainment center for the region.

Additionally, the Project will include ground floor retail, bars, and restaurant uses. The restaurants and bars that will be part of the project will complement surrounding uses and promote a 24-hour walkable and safe experience. The project's improvements to the sidewalks along Sunset Boulevard, Las Palmas, McCadden, Selma and Highland prioritize the pedestrian and create a critical linkage along the Highland Boulevard and Selma Avenue corridors. Further, the project's location adjacent to Metro's Hollywood & Highland Red Line Station not only provides linkages to the rest of the Community Plan Area, but also to the greater Los Angeles metropolitan area. Therefore, the request achieves the objectives of the Hollywood Community Plan, which seeks to promote the development of Hollywood as a major center of population, employment, retail service and entertainment, and that promotes the economic well-being and public convenience through allocating and distributing commercial lands for retail service.

ADDITIONAL FINDINGS FOR ALCOHOL SALES:

d. The proposed use will not adversely affect the welfare of the pertinent community.

The project site is planned for a Regional Center Commercial land use with the corresponding C2, C4, P, PB, RAS3, and RAS4 Zones. The mixed-use project includes 950 residential units, a 308-room hotel, and commercial uses that offer the sale of alcohol for on- or off-site consumption, as well as live entertainment and public dancing. The subject property is zoned for commercial uses and will be redeveloped with a new mixed-use development in a Regional Center Commercial area. The proposed uses will not adversely affect the economic welfare of the community, since a vibrant regional development is anticipated to positively impact the financial health of the property and improve the economic vitality of the Hollywood area via increases in taxable revenue and local employment. The hotel guest rooms, dining, bar and retail establishments will help to establish the site as a lodging, retail and entertainment destination, containing a balanced mix of uses and services. Ample parking, lighting, security and supervision will be provided to ensure that there will be no adverse effect on the welfare of the surrounding community. The Project is located within the Hollywood Center, as identified by the Hollywood Community Plan, which includes Hollywood attractions such as the Hollywood & Highland complex, the Hollywood Walk of Fame, TCL Chinese Theatre, Dolby Theatre, etc., promoting

visitors to Hollywood for business, entertainment events such as the Academy Awards, and tourism. In addition, the Hollywood Community Plan, page HO-2, states that “this center area shall function as: 1) as the commercial center for Hollywood and surrounding communities and 2) as an entertainment center for the entire region.” The Project’s 190,000 square feet of commercial uses and entertainment venue and movie theatre will help achieve this vision for the area as a commercial and entertainment center.

Conditions are herein imposed to integrate the uses into the community as well as protect community members from adverse potential impacts including the requirement to remove graffiti within 24 hours and provide a 24-hour hotline number, and giving the Director’s designee the authority to require a Plan Approval should impacts or operational issues arise. Additional conditions may also be recommended for consideration by the California Department of Alcoholic Beverage Control that regulate the sale of alcoholic beverages to prevent adverse impacts to the neighborhood. Other entitlement conditions will require maintenance and ensure cleanliness of the project and its surroundings. All future operators are required to file an Approval of Plans prior to receiving a Certificate of Occupancy to allow for the review of the mode of operation, security, and the floor plan. The State of California Department of Alcohol Beverage Control will also have the opportunity to impose additional conditions upon each establishment, including limitations on hours of alcohol sales. The limited term of the grant for each individual plan approval allows the City to review the operation of the establishment and consider any changes in the surroundings. Therefore, as conditioned, the Master Conditional Use to allow the sale of alcohol will not adversely affect the welfare of the surrounding community.

e. The granting of the application will not result in an undue concentration of premises for the sale or dispensing for consideration of alcoholic beverages, including beer and wine, in the area of the City involved, giving consideration to applicable State laws and to the California Department of Alcoholic Beverage Control’s guidelines for undue concentration; and also giving consideration to the number and proximity of these establishments within a one thousand foot radius of the site, the crime rate in the area (especially those crimes involving public drunkenness, the illegal sale or use of narcotics, drugs or alcohol, disturbing the peace and disorderly conduct), and whether revocation or nuisance proceedings have been initiated for any use in the area.

According to the California State Department of Alcoholic Beverage Control website, there are 56 active on-site licenses and one off-site license in subject Census Tract No. 1907. The number of active licenses exceeds the number of licenses authorized (three on-site and two off-site) for the census tract due to the concentration of commercial activity – specifically, restaurants, bars, clubs, theaters – in the immediate area.

The project site has a Regional Center Commercial land use designation, which is intended to be for a focal point of regional commerce, identity and activity and containing a diversity of uses such as corporate and professional offices, residential, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities, and supporting services. Given the diversity of uses permitted and encouraged within the Regional Center Commercial land use, a higher concentration of alcohol licenses is anticipated. The Project Site is within a highly-developed regional commercial and entertainment district identified as the Hollywood Center by the Hollywood Community Plan. For example, at the corner of Hollywood Boulevard and Highland Avenue, only 2 blocks to the Project’s proposed hotel at Selma and Highland, are a variety of hotels, event venues, theaters, restaurants, and retail establishments (bars, nightclubs) which have resulted in the existing on-site alcohol licenses to exceed the maximum number allocated. The daytime and nighttime population in the immediate vicinity includes the visitors and

employees to this Hollywood Center, which is envisioned as both a commercial and entertainment center by the Hollywood Community Plan, as evidenced by attractions such as the Hollywood Walk of Fame, TCL Chinese Theatre, Dolby Theatre, etc.

Statistics from the Los Angeles Police Department's Central Division reveal that in Crime Reporting District No. 646, which has jurisdiction over the subject property, a total of 662 crimes were reported in 2017, compared to the citywide average of 191 crimes and the high crime reporting district average of 229 crimes for the same period. Of the 662 crimes reported, 58 arrests were made for liquor laws, 27 arrests were made for drunkenness, and 29 arrests were for driving under the influence.

The above figures indicate that the mixed-use project is located in a high-crime reporting district. As a dense, high-population and tourist destination neighborhood, the crime numbers above that of the average neighborhood are to be expected. However, concentration can be undue when the addition of a license will negatively impact a neighborhood. Concentration is not undue when the approval of a license does not negatively impact an area, but rather such a license benefits the public welfare and convenience. No information was provided by LAPD showing that the approval of the two permits would negatively impact the neighborhood. Of the 662 arrests in the crime district, 17% of the total were for alcohol-related offenses, with 29 of those for driving under the influence (DUI). DUI offenses cannot be blamed in this case as the crime district includes Sunset Boulevard, Hollywood Boulevard and Highland Avenue, which are major traffic access routes through Hollywood to adjacent residential areas with freeway access to other major entertainment areas such as the Central City, Koreatown, Silver Lake and Echo Park. Nonetheless, due to high crime statistics, conditions typically recommended by the Los Angeles Police Department, such as those related to the STAR Program, installation of surveillance cameras and age verification, have been imposed in conjunction with this Master Conditional Use Permit approval. Each establishment is part of a larger development that will benefit from oversight of the project as a whole. In addition, concerns associated with any individual establishment will be addressed in more detail through the required Approval of Plans determination. A Zoning Administrator will have the opportunity to consider more specific operational characteristics as each tenant is identified and the details of each establishment are identified. Security plans, floor plans, seating limitations and other recommended conditions, as well as the mode and character of the operation, will be addressed and assured through site-specific conditions.

f. The proposed use will not detrimentally affect nearby residentially zoned communities in the area of the City involved, after giving consideration to the distance of the proposed use from residential buildings, churches, schools, hospitals, public playgrounds and other similar uses, and other establishments dispensing, for sale or other consideration, alcoholic beverages, including beer and wine.

The following sensitive uses are located within a 500-foot radius of the project:

- Hollywood High School, Selma Avenue Elementary School, Larchmont Charter School, Kings Los Angeles
- Blessed Sacrament Church and School
- Hollywood First Baptist Church
- Selma Park

In addition, there are residentially zoned properties within 500 feet of the project site, in particular the residential areas south of Sunset Boulevard. The sale of alcoholic beverages at the proposed

restaurants, bars and retail establishments will not adversely affect the nearby residential buildings or the sensitive uses listed above because they will operate within the confines of the project site and will be subject to numerous conditions of approval. To further ensure that the sensitive uses are not adversely affected, each of the individual establishments is required to file an Approval of Plans with the Department of City Planning and will be subject to additional conditions of approval. The Hollywood Community Plan, page HO-2, states that “the focal point of the Community is the Hollywood Center, located generally on both sides of Hollywood and Sunset Boulevards between La Brea and Gower Street.” In addition, the Hollywood Community Plan, page HO-2, states that “this center area shall function as: 1) as the commercial center for Hollywood and surrounding communities and 2) as an entertainment center for the entire region.” The Project is therefore located in this identified Hollywood Center and, with its proposed uses, helps achieve the functions of this area as both an entertainment and commercial center. Therefore, the proposed restaurant, bar, club and retail establishments will not detrimentally affect nearby residential uses or other sensitive uses.

ADDITIONAL FINDINGS FOR MAJOR DEVELOPMENT PROJECT

g. The project provides for an arrangement of uses, buildings, structures, open spaces and other improvements that are compatible with the scale and character of the adjacent properties and surrounding neighborhood.

The findings for a Major Development Project Conditional Use Permit apply to a project creating 250 or more hotel guest rooms, and 100,000 square feet or more of floor area in other nonresidential uses in the C4 Zone. The Project Site and surrounding area, primarily north of Sunset Boulevard, have a Regional Center land use designation in the General Plan Framework. The Long-Range Land Use Diagram shows that the Project Site is within a Regional Center. According to the General Plan Framework, different types of Regional Centers fall within the FAR range of 1.5:1 to 6.0:1 and are characterized by 6- to 20-story buildings (or higher). Regional Centers are usually near major transportation hubs. The Regional Center Commercial land use designation is intended to be for a focal point of regional commerce, identity and activity and containing a diversity of uses such as corporate and professional offices, residential, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities, and supporting services. In total, the Project will include approximately 1,381,000 square feet of developed floor area (including existing uses to be retained) corresponding with a total FAR of approximately 3.8:1 averaged across the Project Site. Therefore, the Project is within the FAR acceptable in a Regional Center. While the General Plan Framework states that buildings are 6 to 20 stories, existing buildings in the immediate vicinity are not taller than 12-13 stories because they were built before the City removed a 1911 height limit that prohibited buildings taller than 150 feet. Nonetheless, the General Plan Framework states that buildings may taller than 20 stories. Therefore, the Project buildings are compatible with the character and scale of the Regional Center land use designation. Furthermore, the Metro Red Line Hollywood & Highland Station is located approximately 1,000 feet northwest of the Project Site’s proposed hotel. The Metro Red Line had a ridership of 44,861,106 in 2017. The Project is also well-served by public transit provided by Metro and LADOT, including bus stops along Sunset Boulevard, Highland Avenue, and Hollywood Boulevard. Therefore, the Project Site is within a major transportation hub area. As explained further below, the Project’s proposed commercial and entertainment uses are also compatible with the Regional Center Commercial land use designation, which states that the focal point of this land use is regional commerce with residential, retail and major entertainment facilities. As such, the Project’s commercial and entertainment uses will be

compatible with the arrangement of uses and buildings that are envisioned for the Regional Center in the General Plan Framework.

The Hollywood Community Plan, page HO-2, states that “the focal point of the Community is the Hollywood Center, located generally on both sides of Hollywood and Sunset Boulevards between La Brea and Gower Street.” In addition, the Hollywood Community Plan, page HO-2, states that “this center area shall function as: 1) as the commercial center for Hollywood and surrounding communities and 2) as an entertainment center for the entire region.” The Project’s uses will be compatible with the land use vision in the Hollywood Community Plan for this area as a commercial and entertainment center for the region. Specifically, the Project consists of 308 hotel rooms, and approximately 190,000 square feet of commercial/retail uses consisting of 70,000 square feet of restaurant space, 40,000 square feet of retail space, a 20,000-square foot market, a 30,000-square foot entertainment venue and a 30,000-square foot movie theatre. This Hollywood Center contains many developments that contribute toward making the area a commercial and entertainment center, such as the Hollywood & Highland complex, Loews Hollywood hotel, The Hollywood Roosevelt hotel, the 7021 Hollywood development, Dolby Theatre, etc. which are located 2 blocks to the north of the Project’s hotel proposed at Selma Avenue and Highland Avenue. In addition, the area surrounding the Project Site immediately to the north, along Selma Avenue, is undergoing rapid transition with the ongoing current construction of new mixed-use buildings with residential and commercial uses, as well as new proposed projects on the remaining lots that are currently surface parking lots. The Project’s location near the Hollywood and Highland Metro Red Line Station allows for regional access to the hotel and 190,000 square feet of commercial space. Therefore, the Project’s uses are compatible with this area that is identified by the Hollywood Community Plan as the commercial and entertainment center of the Hollywood Community Plan Area. Finally, the Project proposes an arrangement publicly accessible open spaces that are compatible. Specifically, the Project includes the retention and rehabilitation of the Crossroads of the World complex, which includes courtyards and paseos between its historic buildings. The Project will retain this open space and remove gates that currently exist, in order to reactivate the Crossroads of the World complex. In addition, the Project will develop a new paseo on Parcel B and new courtyards adjacent to the former Hollywood Reporter Building and the Crossroads of the World Early American Building, as well as provide a wide sidewalk in front of the hotel to activate Selma Avenue. The Project therefore builds upon the historical pattern of open space created by the original Crossroads of the World complex. The nearby Hollywood & Highland complex also uses this open space idea in its design, with an open space at the center of the development. In addition, the Project’s new courtyards next to the former Hollywood Reporter and the Early American Building provide open space similar to the courtyards in front of the Chinese Theatre and the Egyptian Theatre. In order to create the paseos, courtyards and other open space, the Project’s high-rise buildings are setback from the property lines and, as in Building B1, the massing of the building becomes narrower as it reaches the top. Thus, the Project provides for an arrangement of uses, buildings, structures, open spaces and other improvements that are compatible with the scale and character of the adjacent properties and surrounding neighborhood.

h. The project complies with the height and area regulations of the zone in which it is located.

The Long-Range Land Use Diagram shows that the Project Site is within a Regional Center. According to the General Plan Framework, different types of Regional Centers fall within the FAR range of 1.5:1 to 6:1 and are characterized by 6- to 20-story buildings (or higher). The Project Site is zoned C4-2D-SN and C4-2D; Height District 2 within the C4 Zone does not have a height

limitation. While the General Plan Framework states that buildings in a Regional Center are 6 to 20 stories or higher, existing buildings in the immediate vicinity are not taller than 12-13 stories because they were built before the City removed a 1911 height limit that prohibited buildings taller than 150 feet. The Project's proposed 308-key hotel is 26 floors, which is consistent with the Regional Center description that buildings are 6 to 20 stories or higher. Furthermore, to retain the integrity of the Crossroads of the World historic complex, the proposed hotel is located at the corner of Highland Avenue and Selma Avenue, the point farthest away from the historic Crossroads buildings. The Project's 190,000 square feet of commercial uses are distributed mostly on the ground floor of the Project buildings (i.e., the hotel, Building B1, Building B2, Building B3 and Building B4), with the tallest of the new commercial buildings being only 2 floors (i.e., Buildings C1 and C2). Regarding area regulations, the Development "D" Limitation in the zoning prefix indicates that development shall not exceed a FAR of 2:1 and 3:1. The Project Site would otherwise have a maximum FAR of 6:1 under Height District 2, which is in line with the intent of the General Plan Framework for Regional Centers. When subtracting the residential uses, the combined total floor area of the 308-key hotel and commercial uses would be 510,000 square feet (320,000 sf hotel + 190,000 sf commercial uses). With the most restrictive of the "D" Limitations of 2:1, the maximum total floor area would be 726,580 square feet (363,290 sf lot x 2). Therefore, the floor area of the hotel and commercial uses could be accommodated within this 2:1 FAR. In addition, the Project as a whole includes requests for On-Menu and Off-Menu Incentives as part of its Density Bonus Compliance Review to: 1) permit a 35 percent increase in the maximum allowable FAR from 2:1 to 2.7:1 (for the C4-2D-SN portion of the site and Parcel E1) and from 3:1 to 4.05:1 (for the C4-2D portion of the site); 2) to permit the averaging of floor area for an average FAR of approximately 3.26:1 across the site; and 3) to permit an approximately 16.51 percent increase of 3.8:1 FAR in lieu of approximately 3.26:1 FAR averaged across the site. Therefore, even when including the residential uses, the overall 3.8:1 FAR of the Project would be within the FAR range of 1.5:1 to 6:1 identified in the General Plan Framework for Regional Centers. For the reasons stated above, the proposed Project would comply with the height and area regulations.

i. The project is consistent with the City Planning Commission's design guidelines for Major Development Projects.

The City Planning Commission has not adopted design guidelines for Major Development Projects; however, the Project is consistent with the following goal from the Urban Form and Neighborhood Design Chapter of the General Plan Framework:

Goal 5A: A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and Citywide scales.

Objective 5.8: Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.

Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.

The Project is located in the Hollywood community, a high density area featuring a mix of land uses, including residential, retail, restaurants, entertainment, and other commercial offices and services. The Project is an infill redevelopment that will revitalize the Project Site by providing a new hotel, residential uses, and neighborhood-serving retail and commercial uses to the surrounding community, which will create a new development that will be attractive to future investment, as well as contribute to a transit-oriented mixed-use neighborhood at both the local and citywide scale when considered with other mixed-use and commercial developments within a 0.5-mile radius of the Project Site. As a development within a Regional Center land use designation, the Project will result in an improved and aesthetically appealing streetscape that will promote pedestrian activity by providing ground floor retail that features extensive windows to encourage pedestrian activities and create a human-scale frontage design. In addition, the Project will promote walkability by encouraging the use of public transit, since the Project Site is near many transit options, particularly the Metro Red Line Hollywood/Highland Station. The Project will also include a pedestrian paseo to the historic Crossroads of the World along the eastern end of the Project Site to promote and enhance pedestrian activity. Within the pedestrian paseo, there will be areas designed to promote gathering and socializing, which can serve as a focus of activity for the surrounding community. These areas consist of interactive water features, seating, planting, and trees. Finally, the Project will incorporate elements that promote individual and community safety. Specifically, the Project will incorporate design strategies established in the City's initiative, "Design Out Crime," which includes the techniques of Crime Prevention Through Environmental Design (CPTED). These design strategies within the Project design will include, but not be limited to, (1) limiting and locating secure access points to areas of high visibility; (2) designing hallways and corridors to be straight forward with no dark corners, as possible; (3) providing clear transitional zones between public, semi-public, and private spaces; and (4) properly lighting and providing proper signage to interior and exterior spaces to direct flow of people and reduce opportunities for crime.

3. Site Plan Review Findings

In order for the Site Plan Review to be granted, all three of the legally mandated findings delineated in LAMC Section 16.05 F must be made in the affirmative.

a. The project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan, and any applicable specific plan.

The Project Site is located within the Hollywood Community Plan Area, which was adopted by the City Council on August 2, 2014 (pursuant to Council File 12-0303 S4). The Plan Map designates the subject property for Regional Center Commercial land use with corresponding zones of C2, C4, P, PB, RAS3, and RAS4. The Project Site is zoned C4-2D-SN and C4-2D. The zone permits uses consistent with commercial and multi-family residential uses. The Project is consistent with the land use and zoning and in substantial conformance with the intent and provisions of the General Plan as reflected in the adopted Community Plan.

General Plan Text. The Hollywood Community Plan, a part of the Land Use Element of the City's General Plan, states the following objectives that are relevant to the Project:

Hollywood Community Plan

Objective No. 1: To further the development of Hollywood as a major center of population, employment, retail service and entertainment.

Objective No. 3: To make provision for the housing required to satisfy the varying needs and desires of all economic segments of the community, maximizing the opportunity for individual choice.

Objective No. 4: To promote economic well-being and public convenience through allocating and distributing commercial lands for retail service and office facilities in quantities and patterns based on accepted planning principles and standards.

The project site is located within an area of Hollywood that is seeing many new developments, including mixed-use projects, that are either built (such as the Columbia Square Project and the Eastown Apartments), under construction (such as the South Block Development and 6250 Sunset Project) or proposed. Several of these projects, like Crossroads Hollywood, involve the retention, rehabilitation and adaptive reuse of iconic historic buildings such as the Columbia Square Project and the 6250 Sunset Project. This project will help achieve Objective No. 1 above to revitalize the Hollywood Center by creating a lively, pedestrian-oriented area by rehabilitating the historic Crossroads of the World complex, the Hollywood Reporter Building and the Bullinger Building, and making them the anchor of a mixed-use development. Specifically, the project includes eight mixed-use buildings with residential, hotel, commercial/retail, entertainment and restaurant uses around a pedestrian paseo that runs through the middle of the project site. The Hollywood Community Plan also states that proposed development in excess of 4.5:1 up to 6:1 FAR may be permitted for Regional Center Commercial development if the development meets objectives in the Redevelopment Plan. The project site has a "D" Limitation pursuant to Ordinance No. 182,173 that limits the FAR to 3:1, but a project may exceed the 3:1 FAR provided that the project is approved by the City Planning Commission, or the City Council on appeal, pursuant to the procedures set forth in LAMC 12.32 D; and conforms with Hollywood Community Plan policies. However, the applicant may utilize the State Density Bonus Law to average floor area across the site. In addition, the applicant may request a waiver of development standards to allow for increased FAR.

The Project will also help achieve Objective No. 3 above by resulting in the construction of 950 residential units, including 11 percent, or 105 units, for Very Low Income Households. In addition, the applicant is required to provide right of first refusal to existing tenants residing in the apartment buildings located at 6200 Selma Avenue and 1535 Las Palmas Avenue, which will ensure that at least 40 tenants are offered a new unit in the completed development at either a Very Low Income rate, if qualified, or at a rent equal or less than the rent that they are currently paying. According to the City's Housing Element 2013-2021, "[i]t is the overall housing vision of the City of Los Angeles to create for all residents a city of livable and sustainable neighborhoods with a range of housing types, sizes and costs in proximity to jobs, amenities and services." The project achieves this vision by providing needed housing, including both affordable housing pursuant to State Density Bonus measures and replacement of rent stabilized units to residents who previously lived in rent stabilized units on the site, along a major transit corridor, Sunset Boulevard, and within a quarter mile radius of several high-capacity transit lines including the Metro Rapid Bus and Metro Red Line. Specifically, the project is located two blocks south of the Hollywood and Highland Metro Subway Station, where the Red Line connect Hollywood to Union Station and North Hollywood. This type of development is also consistent with the City's Framework Element which states that anticipated growth should be directed toward high-density, mixed-use centers and to the neighborhoods around its 80 rail stations.

The Project is also consistent with Objective No. 4 above because of its mixed-use nature which will promote economic well-being by providing commercial uses in a commercially zoned property. In addition, the project's uses are consistent with the adjacent properties which are primarily within

the C4 Zone and are generally developed with commercial, institutional (i.e., churches and schools) and office uses. Finally, the project also promotes public convenience as it is located along a major transit corridor, Sunset Boulevard, and within walking distance (less than half a mile) of high-capacity transit, including the Metro Red Line located at the intersection of Hollywood Boulevard and Highland Avenue.

In addition to achieving the objectives of the Hollywood the Community Plan, the Project would also support and be consistent with the following objectives identified in subsection 506.2.3: Regional Center Commercial Density of the Hollywood Redevelopment Plan:

Objective a: To concentrate high intensity and/or density development in areas with reasonable proximity or direct access to high capacity transportation facilities or which effectively utilize transportation demand management programs.

Objective b: To provide for new development which complements the existing buildings in areas having architecturally and/or historically significant structures.

Objective d: To encourage the development of appropriately designed housing to provide a balance in the community.

Objective e: To provide for substantial, well designed public open space in the Project Area.

The Project achieves Objective “a” above because it locates high-density commercial and residential uses near high capacity transportation facilities like the Metro Subway station at Hollywood and Highland. In addition, as listed above in the MMP, the project includes Mitigation Measure, TRA-MM-1, which requires that the project prepare and implement a TDM Program that includes strategies to promote non-auto travel and reduce the use of single-occupant vehicle trips. The project accomplishes Objective “b” above because it retains and rehabilitates existing, historic buildings on the project site, specifically the Crossroads of the World complex, the former Hollywood Reporter Building and the Bullinger Building. The proposed new buildings would have varying materials, colors and facade plane variations to complement the eclectic architectural styles of the Crossroads of the World Complex and the former Hollywood Reporter Building. The Crossroads of the World Complex and the former Hollywood Reporter Building will be rehabilitated and integrated into the new buildings in accordance with the Secretary of Interior’s Standards.

As previously stated, the Project will also help achieve Objective “d” above by developing 950 residential units with 11 percent, or 105 units, for Very Low Income Households. The residential portion of the project is appropriately designed to accommodate tenants who wish to live near public transit, near employment centers in Hollywood, and near commercial establishments that would be created by the project. In addition, the unit mix of the project includes studios, one bedrooms and two bedrooms to create a housing balance to serve several segments of the population.

Finally, in conformance with Objective “e” above, the Project provides well-designed public open space. Specifically, the project will provide a pedestrian paseo with courtyards connecting the historic Crossroads of the World complex and the new proposed hotel at the corner of Selma Avenue and Highland Avenue. The pedestrian paseo will be accessible from Las Palmas Avenue, McCadden Place, and Selma Avenue and will be designed to feature pedestrian seating areas

with hardscape and landscape areas, as well as feature entry pavilions and other commercial uses at the ground floor to activate the open space.

Therefore, the Project is consistent with the General Plan, the Hollywood Community Plan and the Hollywood Redevelopment Plan.

Framework Element. The Framework Element for the General Plan (Framework Element) was adopted by the City of Los Angeles in December 1996 and re-adopted in August 2001. The Framework Element provides guidance regarding policy issues for the entire City of Los Angeles, including the Project Site. The Framework Element also sets forth a Citywide comprehensive long-range growth strategy and defines Citywide policies regarding such issues as land use, housing, urban form, neighborhood design, open space, economic development, transportation, infrastructure, and public services. Specifically, the proposed development would be consistent with the following objectives and policies of the Framework Element:

Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.

Policy 3.1.3: Identify area for the establishment of new open space opportunities to serve the needs of existing and future residents. These opportunities may include a citywide linear network of parkland and trails, neighborhood parks, and urban open spaces.

Policy 3.1.4: Accommodate new development in accordance with land use and density provisions of the General Plan Framework Long-Range Land Use Diagram (Figures 3-1 to 3-4) and Table 3-1.

Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.

Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.

Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers, as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.

Policy 3.7.1: Accommodate the development of multi-family residential units in areas designated in the community plans in accordance with Table 3-1 and Zoning Ordinance densities indicated in Table 3-3, with the density permitted for each parcel to be identified in the community plans.

Objective 3.10: Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.

Policy 3.10.1: Accommodate land uses that serve a regional market in areas designated as "Regional Center" in accordance with Tables 3-1 and 3-6. Retail uses and services that support and are integrated with the primary uses shall be permitted. The range and

densities/intensities of uses permitted in any area shall be identified in the community plans.

Policy 3.10.4: Provide for the development of public streetscape improvements, where appropriate.

Objective 4.2: Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.

Objective 5.8: Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.

Policy 7.2.3: Encourage new commercial development in proximity to rail and bus transit corridors and stations.

Objective 2: Mitigate the impacts of traffic growth, reduce congestion and improve air quality by implementing a comprehensive program of multi-modal strategies that encourages physical and operational improvements as well as demand management.

Policy 3.13: Enhance pedestrian circulation in neighborhood districts, community centers, and appropriate locations in regional centers and along mixed-use boulevards; promote direct pedestrian linkages between transit portals/platforms and adjacent commercial development through facilities orientation and design.

The Project will achieve these objectives and policies by developing a new mixed-use infill development across four City blocks. Specifically, the Project will develop a total of 1,381,000 square feet of floor area, consisting of 950 residential units, 308 hotel rooms, and approximately 190,000 square feet of commercial/retail uses. The Project will also include active and passive recreational spaces, including roof decks and pools, community rooms and recreational facilities, courtyards, and common open space with gathering and seating areas to serve the needs of existing and future residents. In addition, the Project will develop new publicly accessible courtyards and a pedestrian paseo that will lead to the Crossroads of the World, as well as landscaped public walkways that will connect the entire Project Site, while promoting access from Sunset Boulevard, Las Palmas Avenue, Selma Avenue, and McCadden Place. The pedestrian paseo and courtyard will contain different hardscape and landscaped areas. Groupings of trees will emphasize the path, and lower planters and hardscape areas will demarcate seating and gathering spaces. Hardscape elements will consist of a varied palette of materials. In total, the amount of publicly accessible paseo open space will be 65,300 square feet, with 23,500 square feet between Buildings B1, B2, B3, B4 and B5, and 41,800 square feet around the Crossroads of the World complex. Within the pedestrian paseo, there will be areas designed to promote gathering and socializing, which can serve as a focus of activity for the surrounding community. These areas will consist of interactive water features, seating, and landscaping. The Project will therefore support the needs of existing and future residents, businesses, and visitors of the Hollywood community.

The Long-Range Land Use Diagram shows that the Project Site is within a Regional Center. Generally, different types of Regional Centers fall within the FAR range of 1.5:1 to 6.0:1 and are characterized by 6- to 20 story buildings (or higher). Regional Centers are usually near major transportation hubs. In total, the Project will include approximately 1,381,000 square feet of developed floor area (including existing uses to be retained) corresponding with a total FAR of approximately 3.8:1 averaged across the Project Site. Therefore, the Project is within the FAR acceptable in a Regional Center. Furthermore, the Metro Red Line Hollywood/Highland Station is located approximately 1,000 feet northwest of the Project Site. The Project is also located in an area well-served by public transit provided by Metro and LADOT, including bus stops along Sunset Boulevard, Highland Avenue, and Hollywood Boulevard. As such, the Project, which will create additional housing to meet a growing demand in the Hollywood community and short- and long-term employment opportunities, will be consistent with the type of development that is envisioned for the Regional Center in the General Plan Framework.

In addition, the Project will provide a total of 1,241 spaces (1,048 long-term and 193 short-term) for bicycle parking and a bicycle hub on the ground level of Building E1, the standalone parking structure. As such, the Project will provide opportunities for the use of alternative modes of transportation, thereby promoting an improved quality of life and facilitating a reduction in vehicle trips, vehicle miles traveled, and air pollution. As mentioned above, the Project will include a series of walkways, courtyards and public paseos with access across the Project Site to the surrounding neighborhood to encourage and promote walkability in a high-activity area in the Project vicinity. Furthermore, the Project will result in an improved and aesthetically appealing streetscape that would promote pedestrian activity and enhance the urban lifestyle and livability of the surrounding neighborhood. One of the Project's specific objectives is to enhance the public realm by introducing new amenities, such as streetscape improvements. The Project will provide street trees in accordance with Urban Forestry Division requirements. The Project will be located along Sunset Boulevard, which is characterized as a high pedestrian area and also within proximity to the Hollywood Entertainment District to the north. Thus, the Project will encourage and promote walkability in the high-activity Project Site vicinity, particularly between the Metro Red Line Hollywood/Highland Station, Hollywood & Highland Center, tourist attractions, and other entertainment-related uses along Hollywood Boulevard and the Project Site. In addition, the Project will promote pedestrian activity by providing ground floor retail that will feature extensive glazing to encourage pedestrian activities and create a human-scaled frontage.

The Project will include development of 950 multi-family residential units in accordance with Table 3-1 and Table 3-3 of the General Plan Framework. The Project, which results in a density of approximately 119 units per acre, falls under the High Density designation identified in Table 3-1. This density is also consistent with the corresponding R5 Zone, as identified in Table 3-3. Although the Project Site is currently zoned C4-2D (Commercial, Height District 2 with Development Limitation) and C4-2D-SN (Commercial, Height District 2 with Development Limitation, Signage Supplemental Use District) by the LAMC, the C4 Zone allows for residential development at the density permitted in the R5 Zone when a mix of commercial and residential uses is developed, pursuant to LAMC section 12.22-A,18(a). Height District 2 within the C4 Zone does not impose a height limitation and has a maximum FAR of 6:1. The Development "D" Limitation in the zoning prefix indicates that development shall not exceed a FAR of 2:1 and 3:1. However, the applicant may utilize the State Density Bonus Law to request increased FAR and averaging of floor area across the site. In addition, the applicant may request a waiver of development standard to allow for increased FAR. Thus, the Project will be developed within the allowable density and, with approval of the requested On-Menu and Off-Menu Incentives pursuant to 12.22-A,25(F) and 12.22-A,25(G), will comply with the Framework Element Long-Range Land Use Diagram.

As discussed in Section IV.L, Traffic, Access, and Parking, of the Draft EIR, traffic impacts resulting from the Project would be mitigated to the extent feasible by a combination of physical improvements and implementation of a mitigation program for the Project that includes a Transportation Demand Management program to promote peak period trip reduction; transit system improvements, including the provision of new buses to increase public transit along a key corridor within the Project area; Transportation System Management improvements, including signal controller updates and installation of closed circuit television at key intersections within the Project area; and specific intersection improvements, including physical mitigations and signal phasing enhancements. These mitigation measures are consistent with the City's policies and procedures that support improvements to reduce greenhouse gas emissions by reducing the use of single-occupant vehicle trips, encourage developers to construct transit and pedestrian-friendly projects with safe and walkable sidewalks, and promote other modes of travel.

Housing Element. The 2013-2021 Housing Element, the Housing Element of the General Plan, is the City's blueprint for meeting housing and growth challenges. The Housing Element identifies the City's housing conditions and needs, identifies goals, objectives, and policies that are the foundation of the City's housing and growth strategy, and provides an array of programs the City has committed to in order to implement and create sustainable, mixed-income neighborhoods across Los Angeles. The Project is consistent with the following objectives and policies of the Housing Element:

Objective 1.1: Produce an adequate supply of rental and ownership housing in order to meet current and projected needs.

Policy 3.10.4: Provide for the development of public streetscape improvements, where appropriate.

Policy 1.1.4: Expand opportunities for residential development, particularly in designated Centers, Transit Oriented Districts and along Mixed-Use Boulevards.

Objective 2.2: Promote sustainable neighborhoods that have mixed-income housing, jobs, amenities services and transit.

Objective 2.3: Promote sustainable buildings, which minimize adverse effects on the environment and minimize the use of non-renewable resources.

Policy 2.3.2: Promote and facilitate reduction of water consumption in new and existing housing.

Policy 2.3.3: Promote and facilitate reduction of energy consumption in new and existing housing.

Policy 2.4.3: Develop and implement sustainable design standards in public and private open space and street rights-of-way. Increase access to open space, parks and green spaces.

Objective 2.5: Promote a more equitable distribution of affordable housing opportunities throughout the City.

Policy 2.5.1: Target housing resources, policies and incentives to include affordable housing in residential development, particularly in mixed-use development, Transit Oriented Districts and designated Centers.

The Project is a mixed-use development that will provide new residential, hotel, and commercial retail uses to serve the surrounding community. The Project will provide these uses in proximity to other similar and compatible land uses, which include residential, office, and commercial uses. Specifically, the Project will develop a total of 950 residential units, 105 of which will be set aside for Very Low Income Households to replace the existing rent-stabilized units located in Development Parcel B that would be removed. The Project will therefore meet a growing demand for housing units in the Hollywood Community Plan Area by providing both market-rate and affordable housing options in a variety of unit types (i.e., studios, 1-bedroom and 2-bedroom units). The Project expands residential development opportunities in a designated Regional Center. In addition, the Project will be located in an urbanized commercial area that is well-served by local transit options provided by Metro and LADOT along Sunset Boulevard, Hollywood Boulevard, and Highland Avenue. Therefore, the Project will promote housing next to transit options. Furthermore, the Project will incorporate environmentally sustainable design features required by the Los Angeles Green Building Code and the sustainability intent of the U.S. Green Building Council's LEED green building program, using both LEED-H v2010 and LEED-NC v2009 rating systems, to achieve LEED Silver certification equivalency. Design features in compliance with LEED standards will be incorporated to reduce energy and water usage and wastewater and solid waste generation, thereby promoting the construction of sustainable buildings to minimize the Project's effects on the environment and minimize the use of non-renewable resources. As discussed in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR, the Project will incorporate Project Design Features to reduce water usage. Specifically, the new residential units will be equipped with, among others, high efficiency toilets, clothes washers, and dishwashers and low-flow kitchen/lavatory faucets and showerheads. In addition, the Project will incorporate Project Design Features to improve energy efficiency and reduce energy consumption in new housing and mixed-use development; i.e., the Project is designed to exceed Title 24, Part 6, California Energy Code baseline standard requirements by 15 percent for energy efficiency, based on the 2016 Building Energy Efficiency Standards requirements and use Energy Star-labeled products and appliances, as well as energy-efficient lighting technologies. Finally, 101,075 square feet of open space, consisting of approximately 22,200 square feet of interior amenity space, 51,225 square feet of common open space, and approximately 27,650 square feet of private open space (i.e., balconies) will be provided in accordance with the open space provisions set forth in LAMC Section 12.21-G. The publicly accessible open spaces include the pedestrian paseo between McCadden Place and Las Palmas Avenue, and the existing Crossroads of the World courtyards and the continuation of the paseo between Buildings C2 and the Early American Building of the Crossroads of the World complex. The public and private open space and street rights-of-way will include, but not be limited to, the following features: use of (1) energy-efficiency lighting technologies; (2) weather-based irrigation systems, (3) drought-tolerant landscaping, and (4) use of proper hydro-zoning (i.e., grouping plants with similar water requirements together).

Finally, as conditioned, the Project will provide five percent of the total automobile parking spaces, and all parking spaces in excess of the code requirement, with immediate installation of electric vehicle (EV) charging stations. In addition, as conditioned, the Project will provide a minimum of 135 kilowatts of photovoltaic panels on the Project Site. The condition requiring EV ready parking spaces (installed with chargers) will support the adoption of low and zero emission transportation fuel sources by the Project's visitors, residents, and employees. The condition requiring a solar photovoltaic system will support the use of renewable sources of energy. These conditions

provide for the public welfare and public necessity by reducing the level of pollution from air quality and greenhouse gas emissions to the benefit of the neighborhood and the City. Therefore, the Project is in substantial conformance with the General Plan Health and Wellness Element Policies 2.2 (encourage the design of buildings for healthy living) 5.1 (reduce air pollution), 5.7 (reduce greenhouse gas emissions); Air Quality Element policy 4.2.3 (ensuring new development is compatible with alternative fuel vehicles), 5.1.2 (shift to non-polluting sources of energy in buildings and operations); and Mobility Element Policy 4.1 (expand access to transportation choices). The EV condition is also good zoning practice because it provides a convenient service amenity to the occupants or visitors who use electric vehicles and utilize electricity on-site for other functions. These conditions allow the Project to improve the health, wellness, air and mobility of the residents, visitors, employees and neighborhood, but within the context of the Project's proposed density, uses, and features.

b. The project consists of an arrangement of buildings and structures (including height, bulk and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements that is or will be compatible with existing and future development on neighboring properties.

The surrounding area is highly urbanized and land uses within the general vicinity of the Project Site are characterized by a mix of low- to high-intensity mixed-use, commercial, institutional and residential uses. Specific uses around the Project Site consist of the following:

- North: One- to three-story commercial, institutional and multi-family residential development along Selma Avenue in the C4-2, C4-2D, C4-2-SN and PF-2D Zones.
- South: One- to two-story commercial development along Sunset Boulevard in the C4-2D-SN Zone.
- East: One- to three-story buildings associated with the Blessed Sacrament Church and School campus in the C4-2D Zone.
- West: One- to three-story buildings associated with the Hollywood High School campus across Highland Avenue in the PF-1XL Zone.

The following elements are incorporated into the Project design in a manner that is compatible with both existing and future development in the surrounding area:

Building Design. The Project is designed in a contemporary architectural style. The upper stories are differentiated from the ground floor to create horizontal articulation and reduce the perceived bulk of the buildings. To create a pedestrian oriented area, the Project will locate retail uses on the ground floor, with direct entries with glazing from Sunset Boulevard, Las Palmas, McCadden Place, Selma and Highland Avenue. In addition, there will be courtyards, entrance pavilions and paseos between the buildings. Finally, the architectural design uses a material palette (i.e., painted metal, vision glass, glass guardrails, cement board panels, wood and stone rainscreen, storefront glazing, brick, painted concrete, and wood screens) that reflects a modern, simple identity.

Building Orientation/Frontage. The primary frontages of the Project are all oriented toward the major streets and to the internal paseo and courtyards in order to activate the public realm and the publicly accessible open space created by the Project. Specifically, the entrances to the retail

and hotel in Building A1 are oriented towards Highland Avenue and Selma Avenue. Building B2 features an entrance to the lobby along McCadden Place, while the remainder of the entrances to the retail uses are along Selma and facing toward the pedestrian paseo. Building B1 will have entrances on all sides, fronting Selma, Las Palmas and facing the new pedestrian paseo. Building B4 faces Las Palmas Avenue and will have entrances to the paseo. Building B3 will front Las Palmas and Sunset. Building C1 will front Las Palmas. Building C2 is oriented toward the new courtyard north of the Crossroads of the World Early American Building. Similarly, Building C3 will face the paseo that runs north-south between the Crossroads of the World buildings. Finally, Building D1 will front Selma and Las Palmas.

Building A1 will have frontage along Highland Avenue with pedestrian entrances. Specifically, the commercial retail portion at ground level of Building A1 (the west elevation) will have storefront glazing. The east elevation of Building A1 will feature storefront glazing with painted concrete. The north elevation of Building A1 will also feature storefront glazing with alternating brick. The alternating pattern of brick and storefront glazing is carried through along Selma Avenue on the north elevations of Buildings B1 and B2. Along Las Palmas, the east elevation of Building B3 will feature storefront glazing while Building B1 and Building B4 will feature storefront glazing with alternating brick. Building B3's Sunset (south) elevation will feature storefront glazing and canopies. Buildings C1 and C2 will also feature storefront glazing with alternating brick. Building D1 will feature a brick-clad ground floor. Above the ground floor level, the Project buildings will feature wood screens, vision glass, glass guardrails, painted metal, wood rainscreen, painted concrete, and stone rainscreen.

Height/Bulk. The mixed-use buildings would be variable in height, with a maximum height of about 401 feet for Building B1 and about 385 feet for Building B3. While there is no height limit for the Project Site, Building B1 gradually steps back in a series of volumes to reduce the perceived bulk of that Building. That Building's crown also features a lattice that gives the building a sense of lightness at the top. Similarly, Building B3's roof features a lattice in order to minimize the perceived height of the building. In addition, the roofs of Building B1 and Building B3 would feature roof terraces with trees, which further diminish the perceived height of the buildings. The facades of all the buildings are articulated through changes in material, and breaks in the planes of the facade to reduce the perceived bulk of the buildings. In particular, Building B3 features a grid pattern on its façade with alternating depths, which creates visual interest, and each building is differentiated from each other with different façade treatments. In addition, the building facades are broken up by balconies with glass railing. Generally, the towers are articulated with glass, thus giving the buildings a sense of lightness. Through architectural design and site planning, the Project's perceived height and bulk are reduced. Finally, the changes in materials and planes on the facade create visual interest.

Setbacks. The Project will provide the required setbacks per the LAMC. As shown in the Plot Plan in the attached Exhibit A, the required setbacks vary across the Project Site from 2' to 17' and all of the buildings are within the setbacks. The setbacks will contribute toward activating the pedestrian realm by providing space for pedestrian circulation and landscaping. Therefore, the Project will enhance the streetscape around the Project Site.

Off-Street Parking and Driveways. Parking for commercial and residential uses will be provided in a series of subterranean parking structures and one standalone parking structure (Building E1). Specifically, parking will be located underneath Building A1, the hotel, in a 6-level subterranean parking structure. A 5-level subterranean parking structure will be located underneath Buildings B1, B2, B3, B4 and the new paseo. A 4-level subterranean parking structure will be located underneath Building C2. In addition, there will be a 3-level subterranean parking structure

underneath Building D1. Finally, the standalone parking structure, Building E1, will feature 3 subterranean levels and 5 above-grade parking levels. The project proposes to utilize Parking Option 1 as part of LAMC Section 12.22-A,25 as part of the Density Bonus application. With additional reductions due to bike parking incentives, a total of 1,836 parking spaces are required and 2,260 spaces will be provided. Vehicular access to the hotel (Building A1) will be through a midblock driveway along Selma Avenue and along McCadden Place at the southeast of the building. Building B2 will have a driveway at the south west corner of the building. Building B1 features a driveway along Las Palmas, north of the retail uses located at the southeast corner of the building. The loading dock will be accessed off Las Palmas Avenue, between Building B3 and Building B4. The vehicular access to Building D1 will be off of Las Palmas at the northwest corner of the building. Finally, Building C2 will be accessed by cars from Las Palmas Avenue, around midblock, while the parking structure (Building E1) will be accessed from Selma Avenue at the northeast corner of the building. In total, there are 23 existing driveways on the project site – most will be closed, and the remainder will either be maintained as is, modified or created, for a total of nine driveways for the Project. In each case, the vehicular driveway is the minimum width required to be as efficient as possible and all driveways will be at a sufficient distance from adjacent intersections to not interfere with driver and pedestrian visibility and safety in accordance with LADOT standards and approvals.

Building Signage and Lighting. Project lighting will include lighting from within the interior, as well as lighting at the building exterior elevations, exterior courtyards, and roof decks. Exterior lighting will include light at each building entrance and exit, light for the canopies and shade structures adjacent to the building façade, and light for the courtyards and deck spaces surrounding the buildings. Exterior façade lighting will include accent lighting at the glazed façade components. The pattern of exterior lighting would vary at the commercial, hotel, and residential buildings to create different effects, unique to each building's architectural composition. Site lighting will also include light for circulation and safety, as well as accent light onto trees and other landscape elements. Pathway lighting will be provided by low bollards and poles, and wall-mounted down lights at the building perimeter. Landscape lighting will also include up lights on trees, and recessed fixtures within the parapet walls, planters and benches. All on-site lighting will comply with regulatory requirements, including the requirements that are set forth by CalGreen and Title 24 that stipulate the use of high performance lights with color and glare control. In addition, design elements will be incorporated to limit the direct view of the light source surface for all exterior light fixtures and to ensure that the light source cannot be seen from adjacent residential properties or the public right-of-way. In addition, Project illuminated signs will not exceed 600 candelas per square meter during nighttime hours (with a maximum of 150 candelas per square meter adjacent to and facing Selma Avenue), as identified in Project Design Feature AES-PDF-9. All on-site exterior lighting will be automatically controlled to illuminate only when necessary. All interior lighting will be equipped with occupancy sensors that would automatically extinguish and/or dim lights when not in use. Project signage will be compatible with the commercial and entertainment-oriented uses of the Project Site and the Project vicinity. Proposed signage will include monument or mounted project identity signage, building and commercial tenant signage, and general ground-level and wayfinding pedestrian signage, as permitted by the HSSUD (applicable to the western portion of Development Parcel A and the southern portion of Development Parcel B only). Wayfinding signs will be located at parking garage entrances, elevator lobbies, vestibules, and residential corridors. Illuminated signage will include identification signs, digital message boards, and tenant retail signs. Finally, all new street and pedestrian lighting within the public right-of-way will comply with applicable City regulations and would be approved by the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties.

Open Space and On-Site Landscaping. In total, approximately 101,075 square feet of open space, consisting of approximately 22,200 square feet of interior amenity space, 51,225 square feet of common open space, and approximately 27,650 square feet of private open space (i.e., balconies) will be provided in accordance with the open space provisions set forth in LAMC Section 12.21-G. Furthermore, the existing Crossroads of the World courtyards and the creation of a plaza between Buildings C1 and C2 would provide an additional 41,800 square feet of open space. In addition, the Project will provide approximately 23,500 square feet of open space in a pedestrian paseo located between Building B2 and Building B1 from Selma Avenue to Las Palmas Avenue. As shown in the landscape plan below, the paseo and courtyards will feature hardscape paving, movable furniture, planters, water features, seatwalls, outdoor tables and seating, and green walls. When including the proposed pedestrian paseo and the existing courtyards that are accessible to both the Project residents and the general public, the open space provided within the Project Site will total approximately 166,375 square feet. The Project will also provide 239 new trees, including roof deck trees, trees along the paseo, and street trees along Highland Avenue, Selma Avenue, Las Palmas Avenue and Sunset Boulevard.

Trash Collection. The residential trash areas are located within enclosed trash rooms within the Project buildings, and are not visible to the public. Similarly, commercial trash rooms are fully enclosed and not visible to the public.

Loading Areas. Any deliveries to the commercial spaces will occur before business hours and not affect pedestrian access or street parking. In addition, the loading area for the Project is consolidated into one area and is integrated into the backside of Building B4, which is not visible to the public, between Building B3 and Building B5.

In conclusion, the Project consists of mixed-use buildings with off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements, that are compatible with existing and future planned development on adjacent and neighboring properties.

c. That any residential project provides recreational and service amenities in order to improve habitability for the residents and minimize impacts on neighboring properties.

The project will provide approximately 101,075 square feet of open space, consisting of approximately 22,200 square feet of interior amenity space, 51,225 square feet of common open space, and approximately 27,650 square feet of private open space (i.e., balconies) will be provided in accordance with the open space provisions set forth in LAMC Section 12.21-G. Specially, the Project will include active and passive recreational spaces, including roof decks and pools, community rooms and recreational facilities, courtyards, landscaped gardens, and common open space with gathering and seating areas to serve the needs of existing and future residents. Rooftop amenities include a pool and pool terrace, club room, lounge, entertainment terrace, and artificial turf game lawn. Landscaped courtyards will be located on the podium level and roof level; private patios and balconies will be provided within the residential units; and a private gym is proposed along the Las Palmas Avenue frontage. Landscaped planters and hardscape features will be distributed throughout the podium and rooftop levels, and perimeter landscaping will be installed at the ground level. Due to the amount, variety, and availability of the Project's proposed open space and recreational amenities, it is anticipated that Project residents and employees will generally utilize on-site open space to meet their recreational needs and reduce the Project's demand on public parks and recreational facilities. Therefore, it is determined that the Project provides sufficient recreational and service amenities to serve residents without creating negative impacts on neighboring properties.

4. FINDINGS OF FACT (CEQA)

The City of Los Angeles, as lead agency, acting through the Department of City Planning, prepared an environmental impact report (EIR), consisting of a Draft EIR, Final EIR, and the Errata to the Final EIR under case number ENV-2015-2026-EIR (SCH No. 2015101073). Pursuant to the California Environmental Quality Act (California Public Resources Code Sections 21000-21189.57)(CEQA), the EIR is intended to serve as an informational document for public agency decision-makers and the general public regarding the objectives and components of the project at 1540–1552 Highland Avenue, 6700–6760 Selma Avenue, 6663–6675 Selma Avenue, 6660 Selma Avenue, 1543–1553 McCadden Place, 1542–1546 McCadden Place, 1501–1573 Las Palmas Avenue, 1500–1570 Las Palmas Avenue, 1600–1608 Las Palmas Avenue, and 6665–6713½ Sunset Boulevard, consisting of a 1,381,000-square-foot mixed-use complex including 950 residential apartments, 308 hotel rooms, 190,000 square feet of commercial use, and 2,260 parking spaces (Project), including the retention and rehabilitation of 68,000 square feet of residential uses in the Crossroads of the World complex, the former Hollywood Reporter building, and the Bullinger Building on a 8.3-acre site containing 30 individual parcels over four City blocks located within an identified High Quality Transit Area and Transit Priority Area in Hollywood (Site or Project Site).

In a determination letter dated August 15, 2018, the City's Deputy Advisory Agency (DAA) certified the EIR; adopted the environmental findings prepared for the Project as well as a statement of overriding considerations and a mitigation monitoring program (MMP); and approved the Project's vesting tentative tract map (VTTM). However, an appeal was filed with respect to the DAA's approval of the VTTM, and therefore when the City Planning Commission denied the appeal on September 13, 2018, it also re-certified the EIR, and adopted the environmental findings prepared for the Project as well as a statement of overriding considerations and a mitigation monitoring program.

CEQA and the State CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3, Sections 15000-15387) allow the City to rely on the previously certified EIR unless a Subsequent or Supplemental EIR is required. Specifically, CEQA Guidelines Sections 15162 and 15163 require preparation of a Subsequent or Supplemental EIR when an EIR has been previously certified or a negative declaration has previously been adopted and one or more of the following circumstances exist:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

- a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
- b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
- c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Likewise, Public Resources Code Section 21166 states that unless one or more of the following events occur, no Subsequent or Supplemental EIR shall be required by the lead agency or by any responsible agency:

- Substantial changes are proposed in the project which will require major revisions of the environmental impact report;
- Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report; or
- New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

SECTION 2. CEQA FINDINGS

FIND, based on the independent judgment of the decision-maker, after consideration of the whole of the administrative record, the project was assessed in the Hollywood Crossroads Project EIR No. ENV-2015-2026-EIR, SCH No. 2015101073 re-certified on September 13, 2018; and pursuant to CEQA Guidelines, Sections 15162 and 15164, no subsequent EIR, negative declaration, or addendum is required for approval of the Project.

SECTION 3. MITIGATION MONITORING PROGRAM

All mitigation measures in the previously adopted Mitigation Monitoring Program attached as Exhibit "B", are imposed on the project through Condition of Approval No. 60, to mitigate or avoid significant effects of the proposed Project on the environment and to ensure compliance during Project implementation.

**PLAN FOR FIRST RIGHT OF REFUSAL
UNDER FULL DEMOLITION TO AMMEND LAMC SEC. 152.00**

1. Purpose The First Right of Refusal Plan for Full Demolition (hereinafter, “Plan”) shall be for the purpose of the following:

The City recognizes that displacement from rental housing creates hardships on renters who are senior citizens, persons on fixed incomes and low and moderate income households, particularly when there is a shortage of decent, safe and sanitary housing at affordable rent levels in the City. The City has also declared, in its adoption of Section 161.101*et seq.* of this Code, that it is in the public interest of the people of Los Angeles to protect and promote the existence of sound and wholesome residential buildings, dwelling units and neighborhoods. It is also important to recognize the integrity of a neighborhood which is based on its residents. Displacement of residents has a negative impact on the fabric of that community.

This Plan had been established to define for landlords their responsibilities for those who wish to expand the rental housing stock in Los Angeles by reinvesting in the development of their properties which currently have tenants residing on the property. Through rent adjustments authorized by the LAMC, landlords are able to recover a substantial portion of these unit improvement costs over time. However, Demolition Work involves substantial modification or full removal of buildings and structures and, by its very nature, such work generally makes rental units untenable, as defined by California Civil Code Section 1941.1, until the replacement unit is completed, and the Certificate of Occupancy is issued.

This article is adopted to facilitate landlord investment in Demolition Work without subjecting tenants to either untenable housing conditions during such work; or forced permanent displacement and loss of First Right of Refusal. This Plan requires landlords to mitigate such untenable conditions, through the temporary relocation of tenants to alternative housing accommodations until such time as they can take possession of the replacement unit. Unless the tenant chooses to relinquish the right or is forced to relinquish, in which the tenant will be compensated. These two options should be regarded as mutually exclusive. Plan acknowledges the right of the tenants to occupy their unit does not cease during the time of demolition and construction even if it is not a physical feasible option.

2. Definitions

Temporary Relocation. The moving of a tenant from the tenant’s permanent residence to habitable temporary housing accommodations in accordance with the Plan. The temporary relocation of a tenant from his/her/their permanent place of residence shall not constitute the voluntary vacation of the unit and shall not terminate the status and rights of a tenant, including the right to reoccupy the replacement unit, upon the completion of the Demolition Work and new construction, subject to any rent adjustments as may be authorized under LAMC.

Compensation. The monetary amount a tenant will be entitled to should their right to occupy their replacement unit be diminished without their knowledge or consent; or should they choose to relinquish that right for whatever reason.

- (a) Compensation will be based on tenant's entering into a higher at-risk category for homelessness within five years of a tenant losing their housing;
- (b) Tenants will be compensated the equivalent of 36 months of the average market rate of a comparable unit to what the tenant was in possession of prior to demolition based on the city-wide median price of that size unit; and
- (c) In the case of tenants who are elderly, disabled, or have minor children, the amount will be based on the full 60 months.
- (d) In the case of multiple tenants in a multiple bedroom unit who don't all wish to exercise the First Right of Refusal under the Plan, the Compensation will be based on the median city cost of the one bedroom. Should multiple tenants share the one bedroom, the compensation will be split equally between them. Tenants who wish to exercise their right to occupy the replacement unit from the multiple bedroom unit will be allowed to do so as long as they have not received any compensation to relinquish their right.
- (e) Compensation for relinquishing of Right of First Refusal will not be subject to taxation as relocation is not taxable. Under the Uniform Relocation and Real Property Acquisition Policies Act of 1970 as Amended, relocation is not taxable due to imminent domain. Under California Government Code Chapter 12.75, private landowners are transferred power by the state to enact imminent domain.

3. Responsibility of the Applicant; and Further Findings and Rights of Tenants

- 3.1 A landlord shall pay for all temporary housing accommodation costs and any costs related to relocating the tenant's to temporary housing accommodations during Demolition Work, regardless of whether those costs exceed rent paid by the tenant. The landlord shall also pay any costs related to returning the tenant to his/her unit, if applicable. The Commission may adopt guidelines or regulations regarding the payment of moving costs.
- 3.2 In the case of multiple tenants in a multiple bedroom unit who don't all wish to exercise the First Right of Refusal, the Compensation will be based on the median city cost of the one bedroom. Replacement tenants for the replacement unit will be subject to the same approval requirements as were in place prior to the Demolition Work. Replacement Tenants will not be barred so long as they meet the requirements for renting. The same number of tenants residing in a unit prior to the Demolition work will be the allowable number of tenants allowed into the replacement unit.
- 3.3 Compensation payment must be made available in full within fifteen (15) days of service of the written notice of filing for the Plan. The landlord may, at the landlord's sole discretion and at the landlord's cost, elect to pay the monetary relocation benefits through an escrow account. The monies must be placed in full in the escrow account within the required 15-day period. The escrow account must provide for payments to the tenant(s) for actual compensation and doesn't include: first and last month's rent; security deposit;

or utility connection charges. Payments from the escrow account shall be made within three (3) working days of receiving a request for payment.

- 3.4 Temporary relocation units must be comparable to the unit being demolished, be within five miles of the unit being Demolished, and have the same services and amenities. Any reduction in size, services, or amenities must have a correlating reduction in rent for the duration of the time the tenant resides in the temporary unit.
- 3.5 The newly constructed unit must be comparable to the unit that was demolished and include the same services and amenities. Any reduction in the size of the unit, services, or amenities must accompany a correlating reduction in rent.
- 3.6 No additional rules may be created to prevent the tenant(s) from taking occupancy of the replacement unit, such as (but not limited to) credit checks, additional deposits, rejection based on citizenship status, or criminal charges incurred during the time of construction or Demolition. Only domestic abuse, violent crime, or sexual based criminal arrests would be allowed to prevent the tenant charged with the crime from taking possession of the unit. This would be up to the discretion of the applicant to allow or not allow that tenant to take possession of the replacement unit. All other tenants residing in the unit prior to vacating would still be allowed to take possession of the replacement unit. The tenant's previous lease will still be in good standing. Leases will only allow addendums based on additional amenities and services (such as a new pool area) upon taking possession of the replacement unit.
- 3.7 Tenants taking possession of the replacement unit will not be denied access to any new amenities or services provided by the new development that were not offered in the previous structure prior to Demolition.
- 3.8 If the demolished unit was subject to the RSO regulations, then the replacement unit will also be applicable to RSO as long as the units are in possession of the tenant who resided in the unit prior to Demolition. Rent increases will be based on LARSO for that year. Plan recognizes that tenants were not always listed on the lease, so residency is based on possession prior to Demolition. This finding does not conflict with Costa-Hawkins as the Plan recognizes that the tenant's rights are intact and applicable to the replacement unit as the unit is a replacement unit for an RSO unit built before the legal cut-off year.
- 3.9 Plan does not allow for the applicant or any successor to be free from lawsuits from the City or the tenants based on not fulfilling the requirements of the Plan during any time of Demolition or subsequent construction of replacement units.

4. Changes to the Plan

Plan may only be changed by process of public hearings held before City Council. A motion must be introduced by a council member and is subject to the applicable committee. Commissioners and other administrators may not re-interpret any part of the plan or its intent.

To:

Alan Como, AICP
City of Los Angeles, Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012
Email: alan.como@lacity.org

Electronic Submission

From:

Yucca Association
6500 Sunset Blvd.
Los Angeles, CA 90028

06/07/2020

RE: DEIR ENV-2014-4706-EIR/ 1756, 1760 North Argyle Avenue; 6210-6224 West Yucca Street; and 1765, 1771, 1777, and 1779 North Vista Del Mar Avenue Los Angeles, California, 90028

Mr. Como,

On behalf of the Yucca Association (a non-formal association made up of tenants, LATU members, and community members), we are asking for the following:

1. The DEIR review time should not start when a Stay-at-Home order is in place. The public cannot access documents in public places such as the library, the planning department, or City Hall. In fact, this action at opening the review time when the public is barred from accessing any documents for review is the kind of corruption the public cites in criticisms of the City to favor developers over the communities. Therefore, we ask that the review and comment period be closed and postponed until after the lifting of the order.
2. The DEIR and Plan fail to acknowledge the affordable housing requirements demanded by [CA HSC 33413 \(2\) \(A\) \(i\)](#) which shall be implemented under CA AB 1505. The total base number of affordable units must be increased prior to any density bonus being applied. This must be re-analyzed in all projects asking for entitlements under any specific or community plan in place prior to Palmer v. City of Los Angeles.
3. The DEIR under Housing and Population and Aesthetics fails to acknowledge the surplus of market-rate housing in the Hollywood area. It also creates a conflict by citing the SCAG projections which cite a population plateauing for the area which conflicts with a demand for more housing. The housing needs need to be re-analyzed to include any developments who have been granted their entitlements, smaller by-right units, and housing currently under construction.
4. The DEIR does not quantify the impacts of gentrification and displacement on tenants in the area. Displacement has a direct link to homelessness. The DEIR has failed to analyze

that link. The DEIR also fails to analyze when there is a large vacancy rating and surplus of housing units as an aesthetics issue as well as a housing issue.

5. The landlord should not be allowed to invoke California Government Code Chapter 12.75. Demolition of units doesn't meet the qualifications of the property owner wanting to leave the rental market. In fact, the landlord has shown that they don't intend to leave the rental market by submitting this project for approval to create more rental housing. The DEIR and project fails to include any Plan for Universal Right of Return in order to prevent a loss of population. Making the units RSO isn't enough to address the crisis of affordable housing, if the units are not qualifying for comparative affordable levels that are being charged to the current residents.

Based on the following issues, we ask that Alternative #3 be selected and that the DEIR be revised in order to address all of the stated issues. A Universal Right of Return Plan should be adopted for the project while retaining the original certificate of occupancy, and then overlaying the additional certificate of occupancy over the existing in order to preserve the already existing RSO units by creating replacement units. Replacement units are not subject to California Government Code Chapter 12.75. By selecting Alternative #3, and by only constructing by-right with a Universal Plan of Right of Return, all housing and population issues would be addressed.

The largest conflict in this DEIR and from Findings of Housing, Population, and Jobs in the proposed Hollywood Community Plan:

“Displacement of low-income renters is also a concern, but it is a social and economic impact, which is not a CEQA impact unless it results in an indirect physical impact. To the extent that the CEQA Guidelines could be interpreted as calling for an analysis of social and economic impacts or create a threshold that is a social and economic impact that does not involve a physical impact to the environment, the CEQA Guideline would be invalid. Based on this, an impact from displacement and/or gentrification is only a CEQA impact if it results in a physical impact to the environment. As identified in Appendix G, those physical impacts could be from construction of new housing. It may also be from transportation or other impacts related to people driving a farther distance. The CEQA Guidelines require a lead agency to consider the reasonably foreseeable indirect environmental consequences of a project's economic or social impacts. To require an analysis of the indirect physical impacts, the social and economic impacts must be supported by substantial evidence. An EIR would be required to analyze reasonably foreseeable, not speculative impacts, resulting from social and economic impacts.”

So, do we have too much housing and have met our housing needs if we aren't going to look at RHENA, the current City housing element, and State law for affordability categories with a massive 12.2% vacancy rate as determined by the US Census? Or a 12.3% County wide vacancy rating? Or an 8% City wide vacancy rate? Isn't a massive overstock of empty housing a direct environmental impact that leads to blight and other foreseeable environmental conditions? Without analyzing affordable housing requirements correlating with the housing needs then we aren't abiding by state law.

There is no legal reason that we shouldn't be obeying the requirements for inclusionary zoning. This proposed project sits within the boundaries of the Hollywood CRA redevelopment plan area

which is a specific plan. The requirement to have 15% area wide affordable housing still has not been met. This project will only serve to exacerbate the problem as we are on a trajectory of failure to meet the state law. DEIR fails to analyze the required level of affordable housing in the specific area CRA redevelopment plan by claiming that affordable housing categories aren't an environmental issue; but they are required in state law, which means the DEIR is not in compliance with all State, Community, and Specific Plans if the DEIR doesn't analyze the affordable categories.

This DEIR and project then is meant to be non-equitable as it is based only on the highest income bracket and intends to create an area only accessible for high-income earners. The plan fails to acknowledge if any other income level of renters will be displaced thru gentrification, or how it would affect low-income renters. The DEIR doesn't examine when too many types of units are created for one income level and the high vacancy rates that follows. This DEIR also fails to examine the blight that is induced by a high vacancy rate. Blight is then a conflict established under Aesthetics. Another issue and conflict with Aesthetics is Goal 5A of the City of Los Angeles General Plan Framework Chapter 5, 2001.

GOAL 5A

"A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales."

How can a DEIR for a Community Plan call out for existing and *future* residents while also claiming that it can't analyze speculative impacts that would protect current residents; but this DEIR can analyze speculative impacts for future residents? How can a DEIR for a project call for diversity while creating economic discrimination by refusing to even analyze the refusal to incorporate the required affordable housing needs prior to invoking a density bonus?

In closing, based on the issues brought up in this letter the DEIR is incomplete and conflicts within itself. The DEIR is not in compliance with State, Community, and Specific Plans. The DEIR needs to be re-written in order to address these issues. Or, the selection of Alternative #3 in conjunction with a Universal Right of Return Plan to become a by-right project in order to address the core of the housing needs in this community that are centered around displacement and not production. We have plenty of luxury housing sitting empty. What we need is to stop displacing our community members onto the streets in order to create more luxury housing and profits at the expense of our community.

Best,
Yucca Association



Alan Como <alan.como@lacity.org>

Public Comment: 6220 West Yucca Street Project Draft EIR (ENV-2014-4706-EIR)

Sejal Patel <skpatel122@gmail.com>

Mon, Jun 8, 2020 at 3:43 PM

To: Alan Como <alan.como@lacity.org>

Cc: "E.J. Barrois" <ejbarrois@gmail.com>, Amarildo Barrillas <vosjesus@yahoo.com>, Andrea Bordeaux <andreabordeaux@hotmail.com>, Arjuna Rice <arjuna24@gmail.com>, Canessa <palonone@aol.com>, Carlos <cardompro@gmail.com>, Courtney Quinn <cocoquinn@gmail.com>, Danai Theodora Zaire <dz262@cornell.edu>, Dont Rhine <dont.rhine@gmail.com>, Ebon E Reece Herndon <eh_reece@yahoo.com>, Eduardo Mile Zendejas <lalozendejasmora@gmail.com>, Elgin Petrie <lakenit2004@yahoo.com>, erin tomis <erin.tomis@gmail.com>, Leandro Campos <lscampos@gmail.com>, Lindsey Moore <moorescarves@yahoo.com>, Luis Campos <lscampos00@gmail.com>, Luis Saldivar <mypadinla@gmail.com>, Marco Perez <maquito66@yahoo.com>, Mariana Vargas <queonda007@gmail.com>, Phoenix Campos <phoenixcampos01@gmail.com>, Ricardo Melara <rikardo_bmelara@outlook.com>, Sejal Patel <skpatel122@gmail.com>, Shauna Johnson <shaunajohnson@mail.com>, Tricia Stubbs <triciastubbs@gmail.com>, ams3530 <amandaseward@artvista.net>

Hi Alan,

Please see the attached public comment letter from the Yucca Argyle Tenants Association. Thank you.

On Thu, Apr 23, 2020 at 9:28 AM Alan Como <alan.como@lacity.org> wrote:

Hello,

You are receiving this email because you are an interested party and/or a mandated recipient of the Notice of Completion and Availability for the 6220 West Yucca Street Project Draft Environmental Impact Report (EIR).

This email is to inform you that the City has released the Draft EIR for the 6220 West Yucca Street Project, which is now available for public review on the City's website at the following location: <https://planning.lacity.org/development-services/eir/6220-yucca-project>. In addition, digital copies may be provided via CD-ROM or USB flash drive. Due to current events surrounding COVID-19, the City is taking additional steps to provide the public access to documents. Should you need special accommodations, please contact me directly.

The comment period for the Draft EIR is from April 23, 2020 to June 8, 2020. If you wish to provide comments, please reference the Environmental Case No. above, and submit them in writing by Monday, June 8, 2020, no later than 4:00 p.m.

Written comments may be submitted via:

Mail:

Alan Como, AICP
City of Los Angeles, Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

Email: alan.como@lacity.org

Please see the attached Notice for more information. Thank you.

LOS ANGELES
CITY PLANNING

Alan Como, AICP
City Planner
Los Angeles City Planning

221 N. Figueroa St., Room 1350
Los Angeles, CA 90012
Planning4LA.org
T: (213) 847-3633



7-1



YATA DEIR public comment.pdf

1709K

June 8, 2020

Alan Como, AICP

City of Los Angeles, Department of City Planning

221 North Figueroa Street, Suite 1350

Los Angeles, CA 90012

Submitted electronically at alan.como@lacity.org

RE: Environmental Case No: ENV-2014-4706-EIR

Comments on Draft Environmental Impact Report (DEIR) for the Hollywood Community Plan Update 2 (HCPU2) No. CPC-2016-1450-CPU

Dear Mr. Como,

The Yucca Argyle Tenants Association (YATA) represents all tenants living on the existing property called Yucca Argyle Apartments and single unit homes involved. We are a diverse population expressly mirroring the great and diverse population of our City of Los Angeles. We are the melting pot of Los Angeles; families with children, seniors on fixed incomes, young and middle-aged professionals, working people, church goers, Spanish is our primary language, we are Asian American, Black, Latino and White, we are gay and we are straight. We are neighbors and we are united. We have lived in Hollywood collectively for over 100 years.

7-2

The property is now owned by Riley Realty, L.P. who submitted this EIR for 6220 Yucca Street. The developer plans to demolish our current housing that is under the City of Los Angeles Rent Stabilization Ordinance (RSO) and will build the developments described in the EIR.

The comments herein briefly describe the YATA tenants:

1. Concerns of the project regarding legally binding contract between YATA tenants and the development, affordability and larger Hollywood community issues. Promises made by the developer, Bob Champion, that tenants are awaiting to come to fruition.
2. Support of the EIR's efforts towards the EIR issue topic of Population and Housing

7-3

Since 2015, when YATA tenants first heard about the development project, YATA's main arguments for opposing any new development in Hollywood have been three-fold:

1. Any demolition or loss of RSO housing in the City of Los Angeles is a significant loss of mixed income housing and loss of critical protections for the renter population, who according to the 2016 US Census, make up an overwhelming majority (or 64%) of households in the City of Los Angeles.
2. Displacement of senior tenants, families, working class populations, and diverse population results in a significant hardship for our City's most vulnerable population. These are populations that require access to public transportation and who utilize public transportation significantly more than middle income or wealthier populations. For statistics, please see the On-Board Survey Results + Trend Report by Metro at www.thesource.metro.net.

7-4

7-5

3. Hollywood is already too congested and unsustainable. The roads, the constant repair and remedy of our area's plumbing infrastructure and the Hollywood Faultline studies prove this case. The freeway entrances off of Argyle Avenue and Franklin Avenue is a traffic hazard. Adding more residences will only exacerbate the challenges we already face.

7-6

CONCERNS

1. YATA tenants are awaiting legally binding documentation between tenants and Riley Realty, Inc, relating to the provisions that current tenants will be provided the following per pages 21-22 in the Population and Housing section of the EIR:
 - "The Project would provide all such tenants a right of return to comparable units within the Project at their last year's rent plus applicable annual increases under the RSO once the Project is occupied."
 - "During construction, the Project would fund the difference in rent between the tenants' current rent and new rent until the right of return is exercised."
 - "The Project would not displace substantial numbers of existing people such that the unplanned construction of replacement housing elsewhere would be required."

7-7

2. The DEIR review time should not start when a Stay-at-Home order is in place. We know these concerns have been brought up already with the City and yet the City still does not respect this concern. The review and comment period must be closed and postponed until after the lifting of the order.

7-8

3. Although the project does not call for the density bonus, the project is not beneficial to our community for yet another development be built that is financially out of reach for the average resident of Hollywood and the City of Los Angeles.

7-9

4. Although the project does not displace current residents, it does not allow a mixed income and diverse community (similar to the current residents) to reside in the main residential tower. Market units starting at \$2,500-3,000/month in rent is out of reach for Angelinos who earn less than \$75,000-\$90,000 in yearly income.

7-10

5. The DEIR under Housing and Population and Aesthetics fails to acknowledge the surplus of market-rate housing in the Hollywood area. It also creates a conflict by citing the SCAG projections which cite a population plateauing for the area and conflicts with a demand for more housing.

7-11

6. The DEIR does not quantify the impacts of gentrification and displacement on tenants in Hollywood area. *Displacement has a direct link to homelessness.* The DEIR has failed to analyze that link.

7-12

7. The DEIR also fails to analyze that there is a large vacancy rating and surplus of housing units in the Hollywood area.

7-13

8. The development is within 500 feet of a highway, which is a health risk for everyone who will occupy the future development, especially vulnerable populations and children (ZI

7-14

2427). We look forward to the implementation of the City of Los Angeles's requirements including regulations for indoor air filtration systems to help mitigate the health hazard we have been living with for so many years.

7-14

PROJECT SUPPORT

YATA tenants would like to express our support for the following:

1. Introducing 210 new RSO units into the City of Los Angeles and the State of California. The project aims to replace the existing 44 RSO units with new RSO units and adds an additional 167 RSO units into the City's rental market.
2. Taking serious consideration of the challenges that current tenants will face. When YATA tenants were first interviewed by Del Richards & Associates, Inc (DRA) in 2015 to assess our displacement, we expressed concern about what would happen to our fixed income seniors. DRA responded by stating they would have to be moved outside of Los Angeles County. This was vexing as it spoke to item #2 above. However, Bob Champion took our concerns seriously and has offered a relocation package (verbal and written form that is not legally binding). Meanwhile, since 2015 and to this day, the DRA continues to voice their opinion that tenants do not deserve what Bob Champion has promised us. The DRA continues to occupy an empty apartment but have not done anything of substance to help YATA tenants. We feel badly that Bob Champion is wasting his money on this firm. Thankfully the YATA tenants and Bob Champion have not played into DRA's "crabs in a barrel" mentality as DRA has verbally intimidated and belittled tenants.
3. We are pleased to be part of a historical moment where renters' concerns have been addressed in writing on pages ii-8 (Description of the Proposed Project) and 21-22 in the EIR's Population and Housing section. More specifically, "To comply with these requirements, the Project would provide 100 percent of its 210 residential dwelling units as RSO units. In addition, though not required by law, the Project would provide all onsite tenants a right of return to comparable units within the Project at their last year's rent once the Project is occupied plus applicable annual increases under the RSO. In addition, during construction, the Project would fund the difference in rent between the tenants' current rent and new rent until the right of return is exercised." This is a first in the history of the City of Los Angeles and should be celebrated and held as the on-going policy on handling all future RSO housing loss.
4. The right to return, as stated above, should provide current tenants the right to return regardless of the length of time required to build the new development.
5. We recognize that such a response comes not just from the goodness of Bob Champion's heart, but is also informed by city and state regulations, such as the Diverse Community Goals of the Southern California Association of Governments.

7-15

6. Bob Champion has gone to lengths to provide tenants with relocation assistance that meets our individual needs. However, we are awaiting the same for the Right of Return provisions.

7-15

7. It must be stated here that YATA EXPLICITLY DOES NOT SUPPORT the Hollywood Center Project Environmental Case No ENV-2018-2116-EIR, known as the Hollywood Center Project. This project calls for adding an additional ~1,000 residential units to this unsustainable and crowded corner of Hollywood. This project is dangerous for the reasons described above. This project will hide our historical monument of the Capitol Records Building. We implore the City of Los Angeles PLUM and City Council Departments to vote NO on passage of the Hollywood Center Project EIR.

7-16

Sincerely,

Yucca Argyle Tenants Association (YATA)
(In alphabetical order):

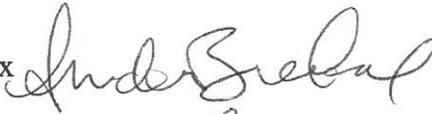
EJ Barrois



Amarildo Barillas & Family

AB

Andrea Bordeaux



Luis Campos & Family

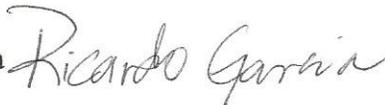


Al Canessa

Carlos Ciurlizza



Ricardo Garcia



Ebon Herndon



Shauna Johnson / Phil Call

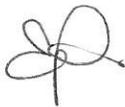


Gregorio Lopez / Olga Escobar

Jim & Dorothy McQuiston

Sejal Patel 

Marco Perez & Family

Elgin Petrie 

Courtney Quinn

Arjuna Rice 

Tricia Stubbs 

Erin Thomas & Family 

~~Mariaga Pargas~~ / Luis Saldivar + family 

Eduardo & Maria Zendejas + family

Lindsey Moore 



Alan Como <alan.como@lacity.org>

6220 Yucca Project Draft EIR Comments

Erik Van Breene <vanbreene@laconservancy.org>
To: "alan.como@lacity.org" <alan.como@lacity.org>

Mon, Jun 8, 2020 at 5:08 PM

Dear Mr. Como,

8-1

Please find the Los Angeles Conservancy's comment letter for the 6220 Yucca Project attached to this email.

Best,

Erik

Erik Van Breene

Preservation Coordinator

Los Angeles Conservancy

523 West Sixth Street, Suite 826

Los Angeles, CA 90014

(213) 430-4206 | vanbreene@laconservancy.org

laconservancy.org

E-News - Facebook - Twitter - Instagram

Membership starts at just \$40

Join the Conservancy today

Yucca_6220-LAC_Comments-DEIR_2020.06.08.pdf
1200K



523 West Sixth Street, Suite 826
Los Angeles, CA 90014

213 623 2489 OFFICE
213 623 3909 FAX
laconservancy.org

June 8, 2020

Sent Electronically

Mr. Alan Como
Los Angeles City Planning
221 N. Figueroa Street Room 1350
Los Angeles, CA 90012
Email: alan.como@lacity.org

RE: 6220 Yucca Street, ENV-2014-4706-EIR

Dear Mr. Como:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for the 6220 Yucca Project. The Conservancy believes this project will significantly impact the California Register listed Vista del Mar / San Carlos Historic District. The current project proposes to demolish two residences within the district's boundaries and to construct two buildings.

8-2

Building One is a mixed-use tower, that incorporates residential units, hotel units, and commercial space. The tower will rise 255 feet tall, well above the one and two-story residences of the historic district. Building Two, located within the historic district, is an all residential building with a total of thirteen units. Building two comprises three residential stories atop a two-story parking podium

1. The project will result in the cumulative loss of 31% of the historic district, this is a significant impact to the district.

The Vista del Mar/ San Carlos Historic district, identified in 1984, is a California Register of Historical Resources listed district. At the time of listing, the district comprised sixteen parcels. The district is representative of early Hollywood development and holds a period of significance of 1910-1923. The district forms an L-shape running south from Yucca Street along Vista Del Mar Avenue and west from Gower Street along Carlos Avenue. The district's L-shape is a significant example of the Hollywood's transition from agricultural land to a developed commercial and residential center of Los Angeles.

8-3



Since the district’s listing, three of the sixteen original parcels have been razed, causing a cumulative loss of contributors at 18%. If the proposed project moves forward as planned, with the two additional parcels to be demolished cumulative loss to the district will be 31%. As noted in the Draft EIR, 1776 Vista del Mar Avenue was misclassified in the past because of alterations that fell outside the period of significance. Excluding this property, the cumulative loss of contributors since listing will be 25%.

8-3

Allowing for such a high cumulative loss sets a dangerous precedent for future projects among Hollywood’s California Register historic districts. These districts include Afton Square, Ivar Hill, and Selma-Le Baig. Historic resources within Hollywood’s former Community Redevelopment Area (CRA), especially the regions historic districts, are experiencing heightened development pressures. As new development encroaches into historic districts, losses of resources will ultimately render them non-eligible for listing in for national, state, and local designation.

2. Proposed Project does not include an alternative for no build within the HPOZ boundaries

A key policy under the California Environmental Quality Act (CEQA) is the lead agency’s duty to “take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history.”¹ To this end, CEQA “requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.”² The fact that an environmentally superior alternative may be more costly or fails to meet all project objectives does not necessarily render it infeasible under CEQA.³ Reasonable alternatives must be considered “even if they substantially impede the project or are more costly.”⁴ Likewise, findings of alternative feasibility or infeasibility must be supported by substantial evidence.⁵

8-4

The proposed project offers five project alternatives in the Draft EIR. However, only the “No Project/No Build Alternative” explores no demolition within the historic district alternative. Because of the project’s encroachment into the district’s boundaries and is the nexus with this significant impact, the applicant must include an additional alternative.

Such an alternative would include rehabilitation of the existing buildings with combined new construction on the vacant corner parcel. Any new construction at this location should mirror with the prevailing building height and reflect the district’s character defining features. The northern portion of Vista del Mar Avenue acts as an important gateway into the district. When turning off of Yucca Street, one can immediately sense the unique character of the street. Therefore, the threatened buildings shall remain in place to retain the district’s sense of place.

¹ Public Resource Code, Sec. 21001 (b), (c).

² *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41; also see Public Resources Code §§ 21002, 21002.1.

³ Guideline § 15126.6(a).

⁴ *San Bernardino Valley Audubon Soc’y v. County of San Bernardino* (1984), 155 Cal.App.3d 738, 750; Guideline § 15126(d)(1).

⁵ Public Resources Code § 21081.5.



3. Conclusion

In conclusion, the Conservancy believes the demolition of 1765 and 1771 Vista del Mar Avenue is a significant impact to the historic resource. The razing of the two residences will leave 69% of the Vista del Mar/Carlos remaining. Because the district is so limited in size, each property holds a significant amount of weight. To reduce impacts on historic resources, the applicant must consider alternatives that include rehabilitation of 1765 and 1771 Vista del Mar Avenue and appropriately scaled and designed new construction. Such an alternative may also include new construction on the vacant corner lot as a means to reach residential unit goals.

8-5

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 6,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

8-6

Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

Sincerely,



Adrian Scott Fine
Director of Advocacy





Alan Como <alan.como@lacity.org>

Yucca Argyle Letter

Jodi Chang <dearjodichang@gmail.com>
To: alan.como@lacity.org

Wed, May 27, 2020 at 4:18 PM

Dear Mr. Como

I am writing as a resident of Hollywood regarding the Draft Environment Impact Report on the proposed development for 6220 West Yucca Street Project (ENV-2014-4706-EIR).

I insist that the Department of City Planning immediately withdraw the Draft EIR project review until 30 days after the City's Stay at Home order is lifted.

Community members received the Draft EIR notification for 6220 West Yucca Street Project (ENV-2014-4706-EIR) on April 23, 2020. According to the notification, tenants and community members have from April 23, 2020 to June 8, 2020 to submit public comment on the Draft EIR.

It is entirely unacceptable that the Department of City Planning post the public notice for the Draft EIR when we are still under a Stay at Home order due to the COVID-19 health emergency. The notification to the tenants announcing public comment invites community members to make an appointment with the Planning Dept to review the DEIR. The same letter also suggests going to the library to review the DEIR. However, according to the Planning Dept website (<https://planning.lacity.org/contact/public-counters>), no appointments are being taken at this time. All Los Angeles libraries are also closed at this time. The lack of public access to the DEIR violates the process of public comment as required under CEQA.

FORM 1-1

As a community member I ask for the following:

1. The DEIR review time should not start when a Stay-at-Home order is in place. The public cannot access documents in public places such as the library, the planning department, or City Hall. In fact, the action of opening review time when the public is barred from accessing documents for review is the kind of corruption that critics cite with regards to the City's favoritism towards developers over communities. The review and comment period must be closed and postponed until after the lifting of the order.

2. Upon my own review of the DEIR and Plan, there is a failure to acknowledge the affordable housing requirements demanded by CA HSC 33413 (2) (A) (i) to be implemented under CA AB 1505. *The total base number of affordable units must be increased prior to any density bonus being applied. This must be re-analyzed in all projects asking for entitlements under any specific or community plan in place prior to Palmer v. City of Los Angeles.*

FORM 1-2

3. The DEIR under Housing and Population and Aesthetics fails to acknowledge the surplus of market-rate housing in the Hollywood area. It also creates a conflict by citing the SCAG projections which cite a population plateauing for the area which conflicts with a demand for more housing. The housing needs must be re-analyzed to include any developments who have been granted their entitlements, smaller by-right units, and housing currently under construction.

FORM 1-3

4. The DEIR does not quantify the impacts of gentrification and displacement on tenants in the area. *Displacement has a direct link to homelessness.* The DEIR has failed to analyze that link. The DEIR also fails to analyze when there is a large vacancy rating and surplus of housing units as an aesthetics issue as well as a housing issue.

FORM 1-4

5. The landlord should not be allowed to invoke California Government Code Chapter 12.75. Demolition of units doesn't meet the qualifications of the property owner wanting to leave the rental market. In fact, the landlord has shown that they don't intend to leave the rental market by submitting this project for approval to create more rental housing. The DEIR and the 6220 West Yucca Street Project fail to include any Plan for Universal Right of Return in order to prevent a loss of population. Making the units RSO isn't enough to address the crisis of affordable housing, if the units are not qualifying for comparative affordable levels that are being charged to the current residents.

FORM 1-5

Based on the above five issues, I ask that Alternative #3 be selected and that the DEIR be revised in order to address all of the stated issues. A Universal Right of Return Plan must be adopted for the project while retaining the original

FORM 1-6

certificate of occupancy, and then overlaying the additional certificate of occupancy in order to preserve the already existing RSO units by creating replacement units. Replacement units are not subject to California Government Code Chapter 12.75. By selecting Alternative #3, and by only constructing by-right with a Universal Plan of Right of Return, all housing and population issues would be addressed.

FORM 1-6

The largest conflict in this DEIR is in the Findings of Housing, Population, and Jobs in the proposed Hollywood Community Plan:

“Displacement of low-income renters is also a concern, but it is a social and economic impact, which is not a CEQA impact unless it results in an indirect physical impact. To the extent that the CEQA Guidelines could be interpreted as calling for an analysis of social and economic impacts or create a threshold that is a social and economic impact that does not involve a physical impact to the environment, the CEQA Guideline would be invalid. Based on this, an impact from displacement and/or gentrification is only a CEQA impact if it results in a physical impact to the environment. As identified in Appendix G, those physical impacts could be from construction of new housing. It may also be from transportation or other impacts related to people driving a farther distance. The CEQA Guidelines require a lead agency to consider the reasonably foreseeable indirect environmental consequences of a project’s economic or social impacts. To require an analysis of the indirect physical impacts, the social and economic impacts must be supported by substantial evidence. An EIR would be required to analyze reasonably foreseeable, not speculative impacts, resulting from social and economic impacts.”

The above statement raises the question: do we have too much housing and have we met our housing needs if we are not going to look at RHENA—the current City housing element—and State law for affordability categories with a massive 12.2% vacancy rate as determined by the U.S. Census? Have we not met our housing needs with a 12.3% County-wide vacancy rating? Or an 8% City-wide vacancy rate? Isn’t a massive overstock of empty housing a direct environmental impact leading to blight and other foreseeable environmental conditions such as the current homelessness where the issue is not supply but affordability? *Without analyzing affordable housing requirements correlating with the housing needs then we aren’t abiding by state law.*

FORM 1-7

There is no legal reason to disobey the requirements for inclusionary zoning. The proposed 6220 West Yucca Street Project sits within the boundaries of the Hollywood CRA redevelopment plan area. The requirement to have 15% area-wide *affordable housing* has not been met. This project will only serve to exacerbate the problem as we are on a trajectory of failure to meet the state law. DEIR fails to analyze the required level of affordable housing in the specific Hollywood CRA redevelopment plan area by claiming that affordable housing categories aren’t an environmental issue. *However, affordable housing categories are required under state law, which means that the DEIR is not in compliance with all State, Community, and Specific Plans if the DEIR doesn’t analyze the affordable categories.*

This DEIR and the 6220 West Yucca Street Project then is meant to be non-equitable as it is based only on the highest income bracket and intends to create an area only accessible for high-income earners. The plan fails to acknowledge if any other income level of renters will be displaced thru gentrification, or how it would affect low-income renters. The DEIR doesn’t examine when too many types of units are created for one income level and the high vacancy rates that follows. This DEIR also fails to examine the blight that is induced by a high vacancy rate. Blight is then a conflict established under Aesthetics.

Another issue and conflict with Aesthetics is Goal 5A of the City of Los Angeles General Plan Framework Chapter 5, 2001. Goal 5A states:

“A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.”

FORM 1-8

How can a DEIR for a Community Plan claim to benefit existing and *future* residents while also claiming that it can’t analyze speculative impacts that would protect current residents; but this DEIR can analyze speculative impacts for future residents? *How can a DEIR for a project call for diversity while creating economic discrimination by refusing to even analyze the refusal to incorporate the required affordable housing needs prior to invoking a density bonus?*

Based on the issues brought up in this letter, the DEIR is incomplete and conflicts with itself. The DEIR is not in compliance with State, Community, and Specific Plans. The DEIR needs to be re-written in order to address these issues. Or, the City must select Alternative #3 in conjunction with a Universal Right of Return Plan to become a by-right project in order to address the core of the housing needs in this community that are centered around displacement and not production.

FORM 1-9

As has been shown by the COVID-19 crisis, Hollywood has plenty of luxury housing sitting empty. We need to stop creating more luxury housing at the expense of displacing our community members.

FORM 1-10

Finally, it is outrageous that the Department of City Planning expects the community to contribute public comment during the COVID-19 crisis. I join with many other community members in demanding that this notice and the review period be withdrawn until 30 days after the governor and mayor lift the Stay at Home order and that the DEIR be redrafted to address the above issues.

FORM 1-11

5/28/2020

FORM 1 - GENERAL COMMENT LETTER (CHANG)
City of Los Angeles Mail - Yucca Argyle Letter

Jodi Chang
7050 Waring Ave.
Apt. 5
Los Angeles, CA 90038



Yucca Argyle DEIR Ltr.pdf
158K

May 27, 2020

Alan Como, AICP
City of Los Angeles, Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012
Submitted electronically at alan.como@lacity.org

RE: Environmental Case No: ENV-2014-4706-EIR
Comments on Draft Environmental Impact Report (DEIR) for the Hollywood Community Plan Update 2 (HCPU2) No. CPC-2016-1450-CPU

Dear Mr. Como

I am writing as a resident of Hollywood regarding the Draft Environment Impact Report on the proposed development for 6220 West Yucca Street Project (ENV-2014-4706-EIR).

I insist that the Department of City Planning immediately withdraw the Draft EIR project review until 30 days after the City's Stay at Home order is lifted.

Community members received the Draft EIR notification for 6220 West Yucca Street Project (ENV-2014-4706-EIR) on April 23, 2020. According to the notification, tenants and community members have from April 23, 2020 to June 8, 2020 to submit public comment on the Draft EIR.

It is entirely *unacceptable* that the Department of City Planning post the public notice for the Draft EIR when we are still under a Stay at Home order due to the COVID-19 health emergency. The notification to the tenants announcing public comment invites community members to make an appointment with the Planning Dept to review the DEIR. The same letter also suggests going to the library to review the DEIR. However, according to the Planning Dept website (<https://planning.lacity.org/contact/public-counters>), *no appointments* are being taken at this time. All Los Angeles libraries are also *closed* at this time. The lack of public access to the DEIR violates the process of public comment as required under CEQA.

As a community member I ask for the following:

1. The DEIR review time should not start when a Stay-at-Home order is in place. The public cannot access documents in public places such as the library, the planning department, or City Hall. In fact, the action of opening review time when the public is barred from accessing documents for review is the kind of corruption that critics cite with regards to the City's favoritism towards developers over communities. The review and comment period must be closed and postponed until after the lifting of the order.
2. Upon my own review of the DEIR and Plan, there is a failure to acknowledge the affordable housing requirements demanded by *CA HSC 33413 (2) (A) (i)* to be implemented under CA AB 1505. *The total base number of affordable units must be increased prior to any*

density bonus being applied. This must be re-analyzed in all projects asking for entitlements under any specific or community plan in place prior to Palmer v. City of Los Angeles.

3. The DEIR under Housing and Population and Aesthetics fails to acknowledge the surplus of market-rate housing in the Hollywood area. It also creates a conflict by citing the SCAG projections which cite a population plateauing for the area which conflicts with a demand for more housing. The housing needs must be re-analyzed to include any developments who have been granted their entitlements, smaller by-right units, and housing currently under construction.

4. The DEIR does not quantify the impacts of gentrification and displacement on tenants in the area. *Displacement has a direct link to homelessness.* The DEIR has failed to analyze that link. The DEIR also fails to analyze when there is a large vacancy rating and surplus of housing units as an aesthetics issue as well as a housing issue.

5. The landlord should not be allowed to invoke California Government Code Chapter 12.75. Demolition of units doesn't meet the qualifications of the property owner wanting to leave the rental market. In fact, the landlord has shown that they don't intend to leave the rental market by submitting this project for approval to create more rental housing. The DEIR and the 6220 West Yucca Street Project fail to include any Plan for Universal Right of Return in order to prevent a loss of population. Making the units RSO isn't enough to address the crisis of affordable housing, if the units are not qualifying for comparative affordable levels that are being charged to the current residents.

Based on the above five issues, I ask that Alternative #3 be selected and that the DEIR be revised in order to address all of the stated issues. A Universal Right of Return Plan must be adopted for the project while retaining the original certificate of occupancy, and then overlaying the additional certificate of occupancy in order to preserve the already existing RSO units by creating replacement units. Replacement units are not subject to California Government Code Chapter 12.75. By selecting Alternative #3, and by only constructing by-right with a Universal Plan of Right of Return, all housing and population issues would be addressed.

The largest conflict in this DEIR is in the Findings of Housing, Population, and Jobs in the proposed Hollywood Community Plan:

“Displacement of low-income renters is also a concern, but it is a social and economic impact, which is not a CEQA impact unless it results in an indirect physical impact. To the extent that the CEQA Guidelines could be interpreted as calling for an analysis of social and economic impacts or create a threshold that is a social and economic impact that does not involve a physical impact to the environment, the CEQA Guideline would be invalid. Based on this, an impact from displacement and/or gentrification is only a CEQA impact if it results in a physical impact to the environment. As identified in Appendix G, those physical impacts could be from construction of new housing. It may also be from transportation or other impacts related to people driving a farther distance. The CEQA Guidelines require a lead agency to consider the reasonably foreseeable indirect environmental consequences of a project's economic or social impacts. To

require an analysis of the indirect physical impacts, the social and economic impacts must be supported by substantial evidence. An EIR would be required to analyze reasonably foreseeable, not speculative impacts, resulting from social and economic impacts.”

The above statement raises the question: do we have too much housing and have we met our housing needs if we are not going to look at RHENA—the current City housing element—and State law for affordability categories with a massive 12.2% vacancy rate as determined by the U.S. Census? Have we not met our housing needs with a 12.3% County-wide vacancy rating? Or an 8% City-wide vacancy rate? Isn't a massive overstock of empty housing a direct environmental impact leading to blight and other foreseeable environmental conditions such as the current homelessness where the issue is not supply but affordability? *Without analyzing affordable housing requirements correlating with the housing needs then we aren't abiding by state law.*

There is no legal reason to disobey the requirements for inclusionary zoning. The proposed 6220 West Yucca Street Project sits within the boundaries of the Hollywood CRA redevelopment plan area. The requirement to have 15% area-wide *affordable housing* has not been met. This project will only serve to exacerbate the problem as we are on a trajectory of failure to meet the state law. DEIR fails to analyze the required level of affordable housing in the specific Hollywood CRA redevelopment plan area by claiming that affordable housing categories aren't an environmental issue. *However, affordable housing categories are required under state law, which means that the DEIR is not in compliance with all State, Community, and Specific Plans if the DEIR doesn't analyze the affordable categories.*

This DEIR and the 6220 West Yucca Street Project then is meant to be non-equitable as it is based only on the highest income bracket and intends to create an area only accessible for high-income earners. The plan fails to acknowledge if any other income level of renters will be displaced thru gentrification, or how it would affect low-income renters. The DEIR doesn't examine when too many types of units are created for one income level and the high vacancy rates that follows. This DEIR also fails to examine the blight that is induced by a high vacancy rate. Blight is then a conflict established under Aesthetics.

Another issue and conflict with Aesthetics is Goal 5A of the City of Los Angeles General Plan Framework Chapter 5, 2001. Goal 5A states:

“A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.”

How can a DEIR for a Community Plan claim to benefit existing and *future* residents while also claiming that it can't analyze speculative impacts that would protect current residents; but this DEIR can analyze speculative impacts for future residents? *How can a DEIR for a project call for diversity while creating economic discrimination by refusing to even analyze the refusal to incorporate the required affordable housing needs prior to invoking a density bonus?*

Based on the issues brought up in this letter, the DEIR is incomplete and conflicts with itself. The DEIR is not in compliance with State, Community, and Specific Plans. The DEIR needs to be re-written in order

ATTACHMENT 1

to address these issues. Or, the City must select Alternative #3 in conjunction with a Universal Right of Return Plan to become a by-right project in order to address the core of the housing needs in this community that are centered around displacement and not production.

As has been shown by the COVID-19 crisis, Hollywood has plenty of luxury housing sitting empty. We need to stop creating more luxury housing at the expense of displacing our community members.

Finally, it is outrageous that the Department of City Planning expects the community to contribute public comment during the COVID-19 crisis. I join with many other community members in demanding that this notice and the review period be withdrawn until 30 days after the governor and mayor lift the Stay at Home order and that the DEIR be redrafted to address the above issues.

Jodi Chang
7050 Waring Ave.
Apt. 5
Los Angeles, CA 90038



Alan Como <alan.como@lacity.org>

RE: Environmental Case No: ENV-2014-4706-EIR Comments on Draft Environmental Impact Report (DEIR) for the Hollywood Community Plan Update 2 (HCPU2) No. CPC-2016-1450-CPU

Paisley Mares <paisleymares@gmail.com>
To: alan.como@lacity.org

Thu, May 28, 2020 at 8:51 PM

 **Dear Mr. Como-converted.pdf**
146K

Dear Mr. Como

I am writing as a resident of Hollywood regarding the Draft Environment Impact Report on the proposed development for 6220 West Yucca Street Project (ENV-2014-4706-EIR).

I insist that the Department of City Planning immediately withdraw the Draft EIR project review until 30 days after the City's Stay at Home order is lifted.

Community members received the Draft EIR notification for 6220 West Yucca Street Project (ENV-2014-4706-EIR) on April 23, 2020. According to the notification, tenants and community members have from April 23, 2020 to June 8, 2020 to submit public comment on the Draft EIR.

It is entirely unacceptable that the Department of City Planning post the public notice for the Draft EIR when we are still under a Stay at Home order due to the COVID-19 health emergency. The notification to the tenants announcing public comment invites community members to make an appointment with the Planning Dept to review the DEIR. The same letter also suggests going to the library to review the DEIR. However, according to the Planning Dept website (<https://planning.lacity.org/contact/public-counters>), no appointments are being taken at this time. All Los Angeles libraries are also closed at this time. The lack of public access to the DEIR violates the process of public comment as required under CEQA.

As a community member I ask for the following:

1. The DEIR review time should not start when a Stay-at-Home order is in place. The public cannot access documents in public places such as the library, the planning department, or City Hall. In fact, the action of opening review time when the public is barred from accessing documents for review is the kind of corruption that critics cite with regards to the City's favoritism towards developers over communities. The review and comment period must be closed and postponed until after the lifting of the order.
2. Upon my own review of the DEIR and Plan, there is a failure to acknowledge the affordable housing requirements demanded by CA HSC 33413 (2) (A) (i) to be implemented under CA AB 1505. *The total base number of affordable units must be increased prior to any density bonus being applied. This must be re-analyzed in all projects asking for entitlements under any specific or community plan in place prior to *Palmer v. City of Los Angeles*.*
3. The DEIR under Housing and Population and Aesthetics fails to acknowledge the surplus of market-rate housing in the Hollywood area. It also creates a conflict by citing the SCAG projections which cite a population plateauing for the area which conflicts with a demand for more housing. The housing needs must be re-analyzed to include any developments who have been granted their entitlements, smaller by-right units, and housing currently under construction.
4. The DEIR does not quantify the impacts of gentrification and displacement on tenants in the area. *Displacement has a direct link to homelessness*. The DEIR has failed

to analyze that link. The DEIR also fails to analyze when there is a large vacancy rating and surplus of housing units as an aesthetics issue as well as a housing issue.

5. The landlord should not be allowed to invoke California Government Code Chapter 12.75. Demolition of units doesn't meet the qualifications of the property owner wanting to leave the rental market. In fact, the landlord has shown that they don't intend to leave the rental market by submitting this project for approval to create more rental housing. The DEIR and the 6220 West Yucca Street Project fail to include any Plan for Universal Right of Return in order to prevent a loss of population. Making the units RSO isn't enough to address the crisis of affordable housing, if the units are not qualifying for comparative affordable levels that are being charged to the current residents.

Based on the above five issues, I ask that Alternative #3 be selected and that the DEIR be revised in order to address all of the stated issues. A Universal Right of Return Plan must be adopted for the project while retaining the original certificate of occupancy, and then overlaying the additional certificate of occupancy in order to preserve the already existing RSO units by creating replacement units. Replacement units are not subject to California Government Code Chapter 12.75. By selecting Alternative #3, and by only constructing by-right with a Universal Plan of Right of Return, all housing and population issues would be addressed.

The largest conflict in this DEIR is in the Findings of Housing, Population, and Jobs in the proposed Hollywood Community Plan:

“Displacement of low-income renters is also a concern, but it is a social and economic impact, which is not a CEQA impact unless it results in an indirect physical impact. To the extent that the CEQA Guidelines could be interpreted as calling for an analysis of social and economic impacts or create a threshold that is a social and economic impact that does not involve a physical impact to the environment, the CEQA Guideline would be invalid. Based on this, an impact from displacement and/or gentrification is only a CEQA impact if it results in a physical impact to the environment. As identified in Appendix G, those physical impacts could be from construction of new housing. It may also be from transportation or other impacts related to people driving a farther distance. The CEQA Guidelines require a lead agency to consider the reasonably foreseeable indirect environmental consequences of a project's economic or social impacts. To require an analysis of the indirect physical impacts, the social and economic impacts must be supported by substantial evidence. An EIR would be required to analyze reasonably foreseeable, not speculative impacts, resulting from social and economic impacts.”

The above statement raises the question: do we have too much housing and have we met our housing needs if we are not going to look at RHENA—the current City housing element—and State law for affordability categories with a massive 12.2% vacancy rate as determined by the U.S. Census? Have we not met our housing needs with a 12.3% County-wide vacancy rating? Or an 8% City-wide vacancy rate? Isn't a massive overstock of empty housing a direct environmental impact leading to blight and other foreseeable environmental conditions such as the current homelessness where the issue is not supply but affordability? *Without analyzing affordable housing requirements correlating with the housing needs then we aren't abiding by*

state law.

There is no legal reason to disobey the requirements for inclusionary zoning. The proposed 6220 West Yucca Street Project sits within the boundaries of the Hollywood CRA redevelopment plan area. The requirement to have 15% area-wide *affordable housing* has not been met. This project will only serve to exacerbate the problem as we are on a trajectory of failure to meet the state law. DEIR fails to analyze the required level of affordable housing in the specific Hollywood CRA redevelopment plan area by claiming that affordable housing categories aren't an environmental issue. *However, affordable housing categories are required under state law, which means that the DEIR is not in compliance with all State, Community, and Specific Plans if the DEIR doesn't analyze the affordable categories.*

This DEIR and the 6220 West Yucca Street Project then is meant to be non-equitable as it is based only on the highest income bracket and intends to create an area only accessible for high-income earners. The plan fails to acknowledge if any other income level of renters will be displaced thru gentrification, or how it would affect low-income renters. The DEIR doesn't examine when too many types of units are created for one income level and the high vacancy rates that follows. This DEIR also fails to examine the blight that is induced by a high vacancy rate. Blight is then a conflict established under Aesthetics.

Another issue and conflict with Aesthetics is Goal 5A of the City of Los Angeles General Plan Framework Chapter 5, 2001. Goal 5A states:

“A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.”

How can a DEIR for a Community Plan claim to benefit existing and *future* residents while also claiming that it can't analyze speculative impacts that would protect current residents; but this DEIR can analyze speculative impacts for future residents? *How can a DEIR for a project call for diversity while creating economic discrimination by refusing to even analyze the refusal to incorporate the required affordable housing needs prior to invoking a density bonus?*

Based on the issues brought up in this letter, the DEIR is incomplete and conflicts with itself. The DEIR is not in compliance with State, Community, and Specific Plans. The DEIR needs to be re-written in order to address these issues. Or, the City must select Alternative #3 in conjunction with a Universal Right of Return Plan to become a by-right project in order to address the core of the housing needs in this community that are centered around displacement and not production.

As has been shown by the COVID-19 crisis, Hollywood has plenty of luxury housing sitting empty. We need to stop creating more luxury housing at the expense of displacing our community members.

Finally, it is outrageous that the Department of City Planning expects the community to contribute public comment during the COVID-19 crisis. I join with many other community

ATTACHMENT 1

members in demanding that this notice and the review period be withdrawn until 30 days after the governor and mayor lift the Stay at Home order and that the DEIR be redrafted to address the above issues.

Your name: ___Paisley Mares_____

Your address: ___5119 Maplewood Ave. #217, Los Angeles, CA 90004_____



Alan Como <alan.como@lacity.org>

Yucca Argyle DEIR

Colin Beckett <colin.beckett42@gmail.com>
To: alan.como@lacity.org

Mon, Jun 1, 2020 at 10:22 AM

June 1, 2020

Alan Como, AICP
City of Los Angeles, Department of City Planning
[221 North Figueroa Street, Suite 1350](#)
[Los Angeles, CA 90012](#)
Submitted electronically at alan.como@lacity.org

RE: Environmental Case No: ENV-2014-4706-EIR
Comments on Draft Environmental Impact Report (DEIR) for the Hollywood Community Plan Update 2 (HCPU2)
No. CPC-2016-1450-CPU

Dear Mr. Como

I am writing as a resident of Hollywood regarding the Draft Environment Impact Report on the proposed development for [6220 West Yucca Street](#) Project (ENV-2014-4706-EIR).

I insist that the Department of City Planning immediately withdraw the Draft EIR project review until 30 days after the City's Stay at Home order is lifted.

Community members received the Draft EIR notification for 6220 West Yucca Street Project (ENV-2014-4706-EIR) on April 23, 2020. According to the notification, tenants and community members have from April 23, 2020 to June 8, 2020 to submit public comment on the Draft EIR.

It is entirely unacceptable that the Department of City Planning post the public notice for the Draft EIR when we are still under a Stay at Home order due to the COVID-19 health emergency. The notification to the tenants announcing public comment invites community members to make an appointment with the Planning Dept to review the DEIR. The same letter also suggests going to the library to review the DEIR. However, according to the Planning Dept website (<https://planning.lacity.org/contact/public-counters>), no appointments are being taken at this time. All Los Angeles libraries are also closed at this time. The lack of public access to the DEIR violates the process of public comment as required under CEQA.

As a community member I ask for the following:

1. The DEIR review time should not start when a Stay-at-Home order is in place. The public cannot access documents in public places such as the library, the planning department, or City Hall. In fact, the action of opening review time when the public is barred from accessing documents for review is the kind of corruption that critics cite with regards to the City's favoritism towards developers over communities. The review and comment period must be closed and postponed until after the lifting of the order.

2. Upon my own review of the DEIR and Plan, there is a failure to acknowledge the affordable housing requirements demanded by CA HSC 33413 (2).(A).(i) to be implemented under CA AB 1505. *The total base number of affordable units must be increased prior to any density bonus being applied. This must be re-analyzed in all projects asking for entitlements under any specific or community plan in place prior to Palmer v. City of Los Angeles.*

3. The DEIR under Housing and Population and Aesthetics fails to acknowledge the surplus of market-rate housing in the Hollywood area. It also creates a conflict by citing the SCAG projections which cite a population plateauing for the area which conflicts with a demand for more housing. The housing needs must be re-analyzed to include any developments who have been granted their entitlements, smaller by-right units, and housing currently under construction.

4. The DEIR does not quantify the impacts of gentrification and displacement on tenants in the area. *Displacement has a direct link to homelessness.* The DEIR has failed to analyze that link. The DEIR also fails to analyze when there is a large vacancy rating and surplus of housing units as an aesthetics issue as well as a housing issue.

5. The landlord should not be allowed to invoke California Government Code Chapter 12.75. Demolition of units doesn't meet the qualifications of the property owner wanting to leave the rental market. In fact, the landlord has shown that they don't intend to leave the rental market by submitting this project for approval to create more rental housing. The DEIR and the 6220 West Yucca Street Project fail to include any Plan for Universal Right of Return in order to prevent a loss of population. Making the units RSO isn't enough to address the crisis of affordable housing, if the units are not qualifying for comparative affordable levels that are being charged to the current residents.

Based on the above five issues, I ask that Alternative #3 be selected and that the DEIR be revised in order to address all of the stated issues. A Universal Right of Return Plan must be adopted for the project while retaining the original certificate of occupancy, and then overlaying the additional certificate of occupancy in order to preserve the already existing RSO units by creating replacement units. Replacement units are not subject to California Government Code Chapter 12.75. By selecting Alternative #3, and by only constructing by-right with a Universal Plan of Right of Return, all housing and population issues would be addressed.

The largest conflict in this DEIR is in the Findings of Housing, Population, and Jobs in the proposed Hollywood Community Plan:

“Displacement of low-income renters is also a concern, but it is a social and economic impact, which is not a CEQA impact unless it results in an indirect physical impact. To the extent that the CEQA Guidelines could be interpreted as calling for an analysis of social and economic impacts or create a threshold that is a social and economic impact that does not involve a physical impact to the environment, the CEQA Guideline would be invalid. Based on this, an impact from displacement and/or gentrification is only a CEQA impact if it results in a physical impact to the environment. As identified in Appendix G, those physical impacts could be from construction of new housing. It may also be from transportation or other impacts related to people driving a farther distance. The CEQA Guidelines require a lead agency to consider the reasonably foreseeable indirect environmental consequences of a project's economic or social impacts. To require an analysis of the indirect physical impacts, the social and economic impacts must be supported by substantial evidence. An EIR would be required to analyze reasonably foreseeable, not speculative impacts, resulting from social and economic impacts.”

The above statement raises the question: do we have too much housing and have we met our housing needs if we are not going to look at RHENA—the current City housing element—and State law for affordability categories with a massive 12.2% vacancy rate as determined by the U.S. Census? Have we not met our housing needs with a 12.3% County-wide vacancy rating? Or an 8% City-wide vacancy rate? Isn't a massive overstock of empty housing a direct environmental impact leading to blight and other foreseeable environmental conditions such as the current homelessness where the issue is not supply but affordability? *Without analyzing affordable housing requirements correlating with the housing needs then we aren't abiding by state law.*

There is no legal reason to disobey the requirements for inclusionary zoning. The proposed [6220 West Yucca Street Project](#) sits within the boundaries of the Hollywood CRA redevelopment plan area. The requirement to have 15% area-wide *affordable housing* has not been met. This project will only serve to exacerbate the problem as we are on a trajectory of failure to meet the state law. DEIR fails to analyze the required level of affordable housing in the specific Hollywood CRA redevelopment plan area by claiming that affordable housing categories aren't an environmental issue. *However, affordable housing categories are required under state law, which means that the DEIR is not in compliance with all State, Community, and Specific Plans if the DEIR doesn't analyze the affordable categories.*

This DEIR and the 6220 West Yucca Street Project then is meant to be non-equitable as it is based only on the highest income bracket and intends to create an area only accessible for high-income earners. The plan fails to acknowledge if any other income level of renters will be displaced thru gentrification, or how it would affect low-income renters. The DEIR doesn't examine when too many types of units are created for one income level and the high vacancy rates that follows. This DEIR also fails to examine the blight that is induced by a high vacancy rate. Blight is then a conflict established under Aesthetics.

Another issue and conflict with Aesthetics is Goal 5A of the City of Los Angeles General Plan Framework Chapter 5, 2001. Goal 5A states:

“A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.”

How can a DEIR for a Community Plan claim to benefit existing and *future* residents while also claiming that it can't analyze speculative impacts that would protect current residents; but this DEIR can analyze speculative impacts for future residents? *How can a DEIR for a project call for diversity while creating economic discrimination by refusing to even analyze the refusal to incorporate the required affordable housing needs prior to invoking a density bonus?*

Based on the issues brought up in this letter, the DEIR is incomplete and conflicts with itself. The DEIR is not in compliance with State, Community, and Specific Plans. The DEIR needs to be re-written in order to address these issues. Or, the City must select Alternative #3 in conjunction with a Universal Right of Return Plan to become a by-right project in order to address the core of the housing needs in this community that are centered around displacement and not production.

As has been shown by the COVID-19 crisis, Hollywood has plenty of luxury housing sitting empty. We need to stop creating more luxury housing at the expense of displacing our community members.

Finally, it is outrageous that the Department of City Planning expects the community to contribute public comment during the COVID-19 crisis. I join with many other community members in demanding that this notice and the review period be withdrawn until 30 days after the governor and mayor lift the Stay at Home order and that the DEIR be redrafted to address the above issues.

6/1/2020

Colin Beckett
1332 N Sycamore Ave
Los Angeles, CA 90028

 **Yucca Argyle DEIR.pdf**
96K

June 1, 2020

Alan Como, AICP
City of Los Angeles, Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012
Submitted electronically at alan.como@lacity.org

RE: Environmental Case No: ENV-2014-4706-EIR
Comments on Draft Environmental Impact Report (DEIR) for the Hollywood Community Plan Update 2 (HCPU2) No. CPC-2016-1450-CPU

Dear Mr. Como

I am writing as a resident of Hollywood regarding the Draft Environment Impact Report on the proposed development for 6220 West Yucca Street Project (ENV-2014-4706-EIR).

I insist that the Department of City Planning immediately withdraw the Draft EIR project review until 30 days after the City's Stay at Home order is lifted.

Community members received the Draft EIR notification for 6220 West Yucca Street Project (ENV-2014-4706-EIR) on April 23, 2020. According to the notification, tenants and community members have from April 23, 2020 to June 8, 2020 to submit public comment on the Draft EIR.

It is entirely *unacceptable* that the Department of City Planning post the public notice for the Draft EIR when we are still under a Stay at Home order due to the COVID-19 health emergency. The notification to the tenants announcing public comment invites community members to make an appointment with the Planning Dept to review the DEIR. The same letter also suggests going to the library to review the DEIR. However, according to the Planning Dept website (<https://planning.lacity.org/contact/public-counters>), *no appointments* are being taken at this time. All Los Angeles libraries are also *closed* at this time. The lack of public access to the DEIR violates the process of public comment as required under CEQA.

As a community member I ask for the following:

1. The DEIR review time should not start when a Stay-at-Home order is in place. The public cannot access documents in public places such as the library, the planning department, or City Hall. In fact, the action of opening review time when the public is barred from accessing documents for review is the kind of corruption that critics cite with regards to the City's favoritism towards developers over communities. The review and comment period must be closed and postponed until after the lifting of the order.

ATTACHMENT 1

2. Upon my own review of the DEIR and Plan, there is a failure to acknowledge the affordable housing requirements demanded by CA HSC 33413 (2) (A) (i) to be implemented under CA AB 1505. *The total base number of affordable units must be increased prior to any density bonus being applied. This must be re-analyzed in all projects asking for entitlements under any specific or community plan in place prior to Palmer v. City of Los Angeles.*

3. The DEIR under Housing and Population and Aesthetics fails to acknowledge the surplus of market-rate housing in the Hollywood area. It also creates a conflict by citing the SCAG projections which cite a population plateauing for the area which conflicts with a demand for more housing. The housing needs must be re-analyzed to include any developments who have been granted their entitlements, smaller by-right units, and housing currently under construction.

4. The DEIR does not quantify the impacts of gentrification and displacement on tenants in the area. *Displacement has a direct link to homelessness.* The DEIR has failed to analyze that link. The DEIR also fails to analyze when there is a large vacancy rating and surplus of housing units as an aesthetics issue as well as a housing issue.

5. The landlord should not be allowed to invoke California Government Code Chapter 12.75. Demolition of units doesn't meet the qualifications of the property owner wanting to leave the rental market. In fact, the landlord has shown that they don't intend to leave the rental market by submitting this project for approval to create more rental housing. The DEIR and the 6220 West Yucca Street Project fail to include any Plan for Universal Right of Return in order to prevent a loss of population. Making the units RSO isn't enough to address the crisis of affordable housing, if the units are not qualifying for comparative affordable levels that are being charged to the current residents.

Based on the above five issues, I ask that Alternative #3 be selected and that the DEIR be revised in order to address all of the stated issues. A Universal Right of Return Plan must be adopted for the project while retaining the original certificate of occupancy, and then overlaying the additional certificate of occupancy in order to preserve the already existing RSO units by creating replacement units. Replacement units are not subject to California Government Code Chapter 12.75. By selecting Alternative #3, and by only constructing by-right with a Universal Plan of Right of Return, all housing and population issues would be addressed.

The largest conflict in this DEIR is in the Findings of Housing, Population, and Jobs in the proposed Hollywood Community Plan:

“Displacement of low-income renters is also a concern, but it is a social and economic impact, which is not a CEQA impact unless it results in an indirect physical impact. To the extent that the CEQA Guidelines could be interpreted as calling for an analysis of social and economic impacts or create a threshold that is a social and economic impact that does not involve a physical impact to the environment, the CEQA Guideline would be invalid. Based on this, an impact from

ATTACHMENT 1

displacement and/or gentrification is only a CEQA impact if it results in a physical impact to the environment. As identified in Appendix G, those physical impacts could be from construction of new housing. It may also be from transportation or other impacts related to people driving a farther distance. The CEQA Guidelines require a lead agency to consider the reasonably foreseeable indirect environmental consequences of a project's economic or social impacts. To require an analysis of the indirect physical impacts, the social and economic impacts must be supported by substantial evidence. An EIR would be required to analyze reasonably foreseeable, not speculative impacts, resulting from social and economic impacts.”

The above statement raises the question: do we have too much housing and have we met our housing needs if we are not going to look at RHENA—the current City housing element—and State law for affordability categories with a massive 12.2% vacancy rate as determined by the U.S. Census? Have we not met our housing needs with a 12.3% County-wide vacancy rating? Or an 8% City-wide vacancy rate? Isn't a massive overstock of empty housing a direct environmental impact leading to blight and other foreseeable environmental conditions such as the current homelessness where the issue is not supply but affordability? *Without analyzing affordable housing requirements correlating with the housing needs then we aren't abiding by state law.*

There is no legal reason to disobey the requirements for inclusionary zoning. The proposed 6220 West Yucca Street Project sits within the boundaries of the Hollywood CRA redevelopment plan area. The requirement to have 15% area-wide *affordable housing* has not been met. This project will only serve to exacerbate the problem as we are on a trajectory of failure to meet the state law. DEIR fails to analyze the required level of affordable housing in the specific Hollywood CRA redevelopment plan area by claiming that affordable housing categories aren't an environmental issue. *However, affordable housing categories are required under state law, which means that the DEIR is not in compliance with all State, Community, and Specific Plans if the DEIR doesn't analyze the affordable categories.*

This DEIR and the 6220 West Yucca Street Project then is meant to be non-equitable as it is based only on the highest income bracket and intends to create an area only accessible for high-income earners. The plan fails to acknowledge if any other income level of renters will be displaced thru gentrification, or how it would affect low-income renters. The DEIR doesn't examine when too many types of units are created for one income level and the high vacancy rates that follows. This DEIR also fails to examine the blight that is induced by a high vacancy rate. Blight is then a conflict established under Aesthetics.

Another issue and conflict with Aesthetics is Goal 5A of the City of Los Angeles General Plan Framework Chapter 5, 2001. Goal 5A states:

“A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.”

How can a DEIR for a Community Plan claim to benefit existing and *future* residents while also claiming that it can't analyze speculative impacts that would protect current residents; but this DEIR can analyze

ATTACHMENT 1

speculative impacts for future residents? How can a DEIR for a project call for diversity while creating economic discrimination by refusing to even analyze the refusal to incorporate the required affordable housing needs prior to invoking a density bonus?

Based on the issues brought up in this letter, the DEIR is incomplete and conflicts with itself. The DEIR is not in compliance with State, Community, and Specific Plans. The DEIR needs to be re-written in order to address these issues. Or, the City must select Alternative #3 in conjunction with a Universal Right of Return Plan to become a by-right project in order to address the core of the housing needs in this community that are centered around displacement and not production.

As has been shown by the COVID-19 crisis, Hollywood has plenty of luxury housing sitting empty. We need to stop creating more luxury housing at the expense of displacing our community members.

Finally, it is outrageous that the Department of City Planning expects the community to contribute public comment during the COVID-19 crisis. I join with many other community members in demanding that this notice and the review period be withdrawn until 30 days after the governor and mayor lift the Stay at Home order and that the DEIR be redrafted to address the above issues.

Colin Beckett
1332 N Sycamore Ave



Alan Como <alan.como@lacity.org>

Attn: Alan Como / Construction Project

Edwin Mantanico <emantanico@gmail.com>
To: alan.como@lacity.org
Cc: emantanico@icloud.com

Mon, Jun 1, 2020 at 11:58 PM

Mr. Como

It is ridiculous that you expect community be able to exercise their opinions and rights in the middle of Shelter at Home orders.

I attached with my email a letter in this regard.

Thanks for your time and attention .

Edwin Mantanico

 **200525 Yucca Argyle DEIR Ltr v2.pdf**
108K

Los Angeles, California June 1, 2020

Alan Como, AICP
City of Los Angeles, Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012
Submitted electronically at alan.como@lacity.org

RE: Environmental Case No: ENV-2014-4706-EIR
Comments on Draft Environmental Impact Report (DEIR) for the Hollywood Community Plan Update 2 (HCPU2) No. CPC-2016-1450-CPU

Dear Mr. Como

I am writing as a resident of Hollywood regarding the Draft Environment Impact Report on the proposed development for 6220 West Yucca Street Project (ENV-2014-4706-EIR).

I insist that the Department of City Planning immediately withdraw the Draft EIR project review until 30 days after the City's Stay at Home order is lifted.

Community members received the Draft EIR notification for 6220 West Yucca Street Project (ENV-2014-4706-EIR) on April 23, 2020. According to the notification, tenants and community members have from April 23, 2020 to June 8, 2020 to submit public comment on the Draft EIR.

It is entirely *unacceptable* that the Department of City Planning post the public notice for the Draft EIR when we are still under a Stay at Home order due to the COVID-19 health emergency. The notification to the tenants announcing public comment invites community members to make an appointment with the Planning Dept to review the DEIR. The same letter also suggests going to the library to review the DEIR. However, according to the Planning Dept website (<https://planning.lacity.org/contact/public-counters>), *no appointments* are being taken at this time. All Los Angeles libraries are also *closed* at this time. The lack of public access to the DEIR violates the process of public comment as required under CEQA.

As a community member I ask for the following:

1. The DEIR review time should not start when a Stay-at-Home order is in place. The public cannot access documents in public places such as the library, the planning department, or City Hall. In fact, the action of opening review time when the public is barred from accessing documents for review is the kind of corruption that critics cite with regards to the City's favoritism towards developers over communities. The review and comment period must be closed and postponed until after the lifting of the order.
2. Upon my own review of the DEIR and Plan, there is a failure to acknowledge the affordable housing requirements demanded by [CA HSC 33413 \(2\) \(A\) \(i\)](#) to be implemented under CA AB 1505. *The total base number of affordable units must be increased prior to any density bonus being applied. This must be re-analyzed in all projects asking for entitlements under any specific or community plan in place prior to Palmer v. City of Los Angeles.*

3. The DEIR under Housing and Population and Aesthetics fails to acknowledge the surplus of market-rate housing in the Hollywood area. It also creates a conflict by citing the SCAG projections which cite a population plateauing for the area which conflicts with a demand for more housing. The housing needs must be re-analyzed to include any developments who have been granted their entitlements, smaller by-right units, and housing currently under construction.

4. The DEIR does not quantify the impacts of gentrification and displacement on tenants in the area. *Displacement has a direct link to homelessness*. The DEIR has failed to analyze that link. The DEIR also fails to analyze when there is a large vacancy rating and surplus of housing units as an aesthetics issue as well as a housing issue.

5. The landlord should not be allowed to invoke California Government Code Chapter 12.75. Demolition of units doesn't meet the qualifications of the property owner wanting to leave the rental market. In fact, the landlord has shown that they don't intend to leave the rental market by submitting this project for approval to create more rental housing. The DEIR and the 6220 West Yucca Street Project fail to include any Plan for Universal Right of Return in order to prevent a loss of population. Making the units RSO isn't enough to address the crisis of affordable housing, if the units are not qualifying for comparative affordable levels that are being charged to the current residents.

Based on the above five issues, I ask that Alternative #3 be selected and that the DEIR be revised in order to address all of the stated issues. A Universal Right of Return Plan must be adopted for the project while retaining the original certificate of occupancy, and then overlaying the additional certificate of occupancy in order to preserve the already existing RSO units by creating replacement units. Replacement units are not subject to California Government Code Chapter 12.75. By selecting Alternative #3, and by only constructing by-right with a Universal Plan of Right of Return, all housing and population issues would be addressed.

The largest conflict in this DEIR is in the Findings of Housing, Population, and Jobs in the proposed Hollywood Community Plan:

“Displacement of low-income renters is also a concern, but it is a social and economic impact, which is not a CEQA impact unless it results in an indirect physical impact. To the extent that the CEQA Guidelines could be interpreted as calling for an analysis of social and economic impacts or create a threshold that is a social and economic impact that does not involve a physical impact to the environment, the CEQA Guideline would be invalid. Based on this, an impact from displacement and/or gentrification is only a CEQA impact if it results in a physical impact to the environment. As identified in Appendix G, those physical impacts could be from construction of new housing. It may also be from transportation or other impacts related to people driving a farther distance. The CEQA Guidelines require a lead agency to consider the reasonably foreseeable indirect environmental consequences of a project's economic or social impacts. To require an analysis of the indirect physical impacts, the social and economic impacts must be supported by substantial evidence. An EIR would be required to analyze reasonably foreseeable, not speculative impacts, resulting from social and economic impacts.”

The above statement raises the question: do we have too much housing and have we met our housing needs if we are not going to look at RHENA—the current City housing element—and State law for

affordability categories with a massive 12.2% vacancy rate as determined by the U.S. Census? Have we not met our housing needs with a 12.3% County-wide vacancy rating? Or an 8% City-wide vacancy rate? Isn't a massive overstock of empty housing a direct environmental impact leading to blight and other foreseeable environmental conditions such as the current homelessness where the issue is not supply but affordability? *Without analyzing affordable housing requirements correlating with the housing needs then we aren't abiding by state law.*

There is no legal reason to disobey the requirements for inclusionary zoning. The proposed 6220 West Yucca Street Project sits within the boundaries of the Hollywood CRA redevelopment plan area. The requirement to have 15% area-wide *affordable housing* has not been met. This project will only serve to exacerbate the problem as we are on a trajectory of failure to meet the state law. DEIR fails to analyze the required level of affordable housing in the specific Hollywood CRA redevelopment plan area by claiming that affordable housing categories aren't an environmental issue. *However, affordable housing categories are required under state law, which means that the DEIR is not in compliance with all State, Community, and Specific Plans if the DEIR doesn't analyze the affordable categories.*

This DEIR and the 6220 West Yucca Street Project then is meant to be non-equitable as it is based only on the highest income bracket and intends to create an area only accessible for high-income earners. The plan fails to acknowledge if any other income level of renters will be displaced thru gentrification, or how it would affect low-income renters. The DEIR doesn't examine when too many types of units are created for one income level and the high vacancy rates that follows. This DEIR also fails to examine the blight that is induced by a high vacancy rate. Blight is then a conflict established under Aesthetics.

Another issue and conflict with Aesthetics is Goal 5A of the City of Los Angeles General Plan Framework Chapter 5, 2001. Goal 5A states:

“A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.”

How can a DEIR for a Community Plan claim to benefit existing and *future* residents while also claiming that it can't analyze speculative impacts that would protect current residents; but this DEIR can analyze speculative impacts for future residents? *How can a DEIR for a project call for diversity while creating economic discrimination by refusing to even analyze the refusal to incorporate the required affordable housing needs prior to invoking a density bonus?*

Based on the issues brought up in this letter, the DEIR is incomplete and conflicts with itself. The DEIR is not in compliance with State, Community, and Specific Plans. The DEIR needs to be re-written in order to address these issues. Or, the City must select Alternative #3 in conjunction with a Universal Right of Return Plan to become a by-right project in order to address the core of the housing needs in this community that are centered around displacement and not production.

As has been shown by the COVID-19 crisis, Hollywood has plenty of luxury housing sitting empty. We need to stop creating more luxury housing at the expense of displacing our community members.

Finally, it is outrageous that the Department of City Planning expects the community to contribute public comment during the COVID-19 crisis. I join with many other community members in demanding that this

ATTACHMENT 1

notice and the review period be withdrawn until 30 days after the governor and mayor lift the Stay at Home order and that the DEIR be redrafted to address the above issues.

Your name: Edwin Mantanico

Your address: 1325 Gabriel Garcia marquez St. Apt. B
Los Angeles, California 90033



Alan Como <alan.como@lacity.org>

RE: Environmental Case No: ENV-2014-4706-EIR

Michael Lopez <info@postlopez.com>
To: alan.como@lacity.org

Mon, Jun 1, 2020 at 10:29 PM

Hello Alan Como,

I've attached a letter asking you to withdraw the Draft EIR until 30 days after the Stay at Home Order is lifted. It can also be located at this Google Drive link:

<https://drive.google.com/open?id=1nwWiCjs899Rv72V6n6Ln3moTd6fBratE>

Thank you,
-Michael Lopez

Graphic Designer
<http://www.postlopez.com>

 **200525 Yucca Argyle DEIR Ltr_MichaelLopez.pdf**
97K

June 1st, 2020

Alan Como, AICP
City of Los Angeles, Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012
Submitted electronically at alan.como@lacity.org

RE: Environmental Case No: ENV-2014-4706-EIR
Comments on Draft Environmental Impact Report (DEIR) for the Hollywood Community Plan Update 2 (HCPU2) No. CPC-2016-1450-CPU

Dear Mr. Como,

I am writing as a resident of Hollywood regarding the Draft Environment Impact Report on the proposed development for 6220 West Yucca Street Project (ENV-2014-4706-EIR).

I insist that the Department of City Planning immediately withdraw the Draft EIR project review until 30 days after the City's Stay at Home order is lifted.

Community members received the Draft EIR notification for 6220 West Yucca Street Project (ENV-2014-4706-EIR) on April 23, 2020. According to the notification, tenants and community members have from April 23, 2020 to June 8, 2020 to submit public comment on the Draft EIR.

It is entirely *unacceptable* that the Department of City Planning post the public notice for the Draft EIR when we are still under a Stay at Home order due to the COVID-19 health emergency. The notification to the tenants announcing public comment invites community members to make an appointment with the Planning Dept to review the DEIR. The same letter also suggests going to the library to review the DEIR. However, according to the Planning Dept website (<https://planning.lacity.org/contact/public-counters>), *no appointments* are being taken at this time. All Los Angeles libraries are also *closed* at this time. The lack of public access to the DEIR violates the process of public comment as required under CEQA.

As a community member I ask for the following:

1. The DEIR review time should not start when a Stay-at-Home order is in place. The public cannot access documents in public places such as the library, the planning department, or City Hall. In fact, the action of opening review time when the public is barred from accessing documents for review is the kind of corruption that critics cite with regards to the City's favoritism towards developers over communities. The review and comment period must be closed and postponed until after the lifting of the order.

2. Upon my own review of the DEIR and Plan, there is a failure to acknowledge the affordable housing requirements demanded by CA HSC 33413 (2) (A) (i) to be implemented under CA AB 1505. *The total base number of affordable units must be increased prior to any density bonus being applied. This must be re-analyzed in all projects asking for entitlements under any specific or community plan in place prior to Palmer v. City of Los Angeles.*

3. The DEIR under Housing and Population and Aesthetics fails to acknowledge the surplus of market-rate housing in the Hollywood area. It also creates a conflict by citing the SCAG projections which cite a population plateauing for the area which conflicts with a demand for more housing. The housing needs must be re-analyzed to include any developments who have been granted their entitlements, smaller by-right units, and housing currently under construction.

4. The DEIR does not quantify the impacts of gentrification and displacement on tenants in the area. *Displacement has a direct link to homelessness.* The DEIR has failed to analyze that link. The DEIR also fails to analyze when there is a large vacancy rating and surplus of housing units as an aesthetics issue as well as a housing issue.

5. The landlord should not be allowed to invoke California Government Code Chapter 12.75. Demolition of units doesn't meet the qualifications of the property owner wanting to leave the rental market. In fact, the landlord has shown that they don't intend to leave the rental market by submitting this project for approval to create more rental housing. The DEIR and the 6220 West Yucca Street Project fail to include any Plan for Universal Right of Return in order to prevent a loss of population. Making the units RSO isn't enough to address the crisis of affordable housing, if the units are not qualifying for comparative affordable levels that are being charged to the current residents.

Based on the above five issues, I ask that Alternative #3 be selected and that the DEIR be revised in order to address all of the stated issues. A Universal Right of Return Plan must be adopted for the project while retaining the original certificate of occupancy, and then overlaying the additional certificate of occupancy in order to preserve the already existing RSO units by creating replacement units. Replacement units are not subject to California Government Code Chapter 12.75. By selecting Alternative #3, and by only constructing by-right with a Universal Plan of Right of Return, all housing and population issues would be addressed.

The largest conflict in this DEIR is in the Findings of Housing, Population, and Jobs in the proposed Hollywood Community Plan:

“Displacement of low-income renters is also a concern, but it is a social and economic impact, which is not a CEQA impact unless it results in an indirect physical impact. To the extent that the CEQA Guidelines could be interpreted as calling for an analysis of social and economic impacts or create a threshold that is a social and economic impact that does not involve a physical impact to the environment, the CEQA Guideline would be invalid. Based on this, an impact from

displacement and/or gentrification is only a CEQA impact if it results in a physical impact to the environment. As identified in Appendix G, those physical impacts could be from construction of new housing. It may also be from transportation or other impacts related to people driving a farther distance. The CEQA Guidelines require a lead agency to consider the reasonably foreseeable indirect environmental consequences of a project's economic or social impacts. To require an analysis of the indirect physical impacts, the social and economic impacts must be supported by substantial evidence. An EIR would be required to analyze reasonably foreseeable, not speculative impacts, resulting from social and economic impacts.”

The above statement raises the question: do we have too much housing and have we met our housing needs if we are not going to look at RHENA—the current City housing element—and State law for affordability categories with a massive 12.2% vacancy rate as determined by the U.S. Census? Have we not met our housing needs with a 12.3% County-wide vacancy rating? Or an 8% City-wide vacancy rate? Isn't a massive overstock of empty housing a direct environmental impact leading to blight and other foreseeable environmental conditions such as the current homelessness where the issue is not supply but affordability? *Without analyzing affordable housing requirements correlating with the housing needs then we aren't abiding by state law.*

There is no legal reason to disobey the requirements for inclusionary zoning. The proposed 6220 West Yucca Street Project sits within the boundaries of the Hollywood CRA redevelopment plan area. The requirement to have 15% area-wide *affordable housing* has not been met. This project will only serve to exacerbate the problem as we are on a trajectory of failure to meet the state law. DEIR fails to analyze the required level of affordable housing in the specific Hollywood CRA redevelopment plan area by claiming that affordable housing categories aren't an environmental issue. *However, affordable housing categories are required under state law, which means that the DEIR is not in compliance with all State, Community, and Specific Plans if the DEIR doesn't analyze the affordable categories.*

This DEIR and the 6220 West Yucca Street Project then is meant to be non-equitable as it is based only on the highest income bracket and intends to create an area only accessible for high-income earners. The plan fails to acknowledge if any other income level of renters will be displaced thru gentrification, or how it would affect low-income renters. The DEIR doesn't examine when too many types of units are created for one income level and the high vacancy rates that follows. This DEIR also fails to examine the blight that is induced by a high vacancy rate. Blight is then a conflict established under Aesthetics.

Another issue and conflict with Aesthetics is Goal 5A of the City of Los Angeles General Plan Framework Chapter 5, 2001. Goal 5A states:

“A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.”

How can a DEIR for a Community Plan claim to benefit existing and *future* residents while also claiming that it can't analyze speculative impacts that would protect current residents; but this DEIR can analyze

ATTACHMENT 1

speculative impacts for future residents? How can a DEIR for a project call for diversity while creating economic discrimination by refusing to even analyze the refusal to incorporate the required affordable housing needs prior to invoking a density bonus?

Based on the issues brought up in this letter, the DEIR is incomplete and conflicts with itself. The DEIR is not in compliance with State, Community, and Specific Plans. The DEIR needs to be re-written in order to address these issues. Or, the City must select Alternative #3 in conjunction with a Universal Right of Return Plan to become a by-right project in order to address the core of the housing needs in this community that are centered around displacement and not production.

As has been shown by the COVID-19 crisis, Hollywood has plenty of luxury housing sitting empty. We need to stop creating more luxury housing at the expense of displacing our community members.

Finally, it is outrageous that the Department of City Planning expects the community to contribute public comment during the COVID-19 crisis. I join with many other community members in demanding that this notice and the review period be withdrawn until 30 days after the governor and mayor lift the Stay at Home order and that the DEIR be redrafted to address the above issues.

Michael Lopez
5439 Russell Ave. #12,
Los Angeles, CA 90027



Alan Como <alan.como@lacity.org>

6220 West Yucca Street

Lois DeArmond <loisde.armond@gmail.com>
To: alan.como@lacity.org

Wed, Jun 3, 2020 at 11:44 AM

Dear Mr. Como;
Please find attached a letter regarding the [6220 W. Yucca Street](#) project.
Thank you for your consideration of this urgent matter.
Lois DeArmond

 **HWD Letter to Planng.pdf**
394K

June 3, 2020

Alan Como, AICP
City of Los Angeles, Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012
Submitted electronically at alan.como@lacity.org

RE: Environmental Case No: ENV-2014-4706-EIR
Comments on Draft Environmental Impact Report (DEIR) for the Hollywood Community Plan Update 2 (HCPU2) No. CPC-2016-1450-CPU

Dear Mr. Como

I am writing as a resident of Los Angeles regarding the Draft Environment Impact Report on the proposed development for 6220 West Yucca Street Project (ENV-2014-4706-EIR).

I insist that the Department of City Planning immediately withdraw the Draft EIR project review until 30 days after the City's Stay at Home order is lifted.

Community members received the Draft EIR notification for 6220 West Yucca Street Project (ENV-2014-4706-EIR) on April 23, 2020. According to the notification, tenants and community members have from April 23, 2020 to June 8, 2020 to submit public comment on the Draft EIR.

It is entirely *unacceptable* that the Department of City Planning post the public notice for the Draft EIR when we are still under a Stay at Home order due to the COVID-19 health emergency. The notification to the tenants announcing public comment invites community members to make an appointment with the Planning Dept to review the DEIR. The same letter also suggests going to the library to review the DEIR. However, according to the Planning Dept website (<https://planning.lacity.org/contact/public-counters>), *no appointments* are being taken at this time. All Los Angeles libraries are also *closed* at this time. The lack of public access to the DEIR violates the process of public comment as required under CEQA.

As a community member I ask for the following:

1. The DEIR review time should not start when a Stay-at-Home order is in place. The public cannot access documents in public places such as the library, the planning department, or City Hall. In fact, the action of opening review time when the public is barred from accessing documents for review is the kind of corruption that critics cite with regards to the City's favoritism towards developers over communities. The review and comment period must be closed and postponed until after the lifting of the order.
2. Upon my own review of the DEIR and Plan, there is a failure to acknowledge the affordable housing requirements demanded by [CA HSC 33413 \(2\) \(A\) \(i\)](#) to be implemented under CA AB 1505. *The total base number of affordable units must be increased prior to any density bonus being applied. This must be re-analyzed in all projects asking for entitlements under any specific or community plan in place prior to Palmer v. City of Los Angeles.*

3. The DEIR under Housing and Population and Aesthetics fails to acknowledge the surplus of market-rate housing in the Hollywood area. It also creates a conflict by citing the SCAG projections which cite a population plateauing for the area which conflicts with a demand for more housing. The housing needs must be re-analyzed to include any developments who have been granted their entitlements, smaller by-right units, and housing currently under construction.
4. The DEIR does not quantify the impacts of gentrification and displacement on tenants in the area. *Displacement has a direct link to homelessness*. The DEIR has failed to analyze that link. The DEIR also fails to analyze when there is a large vacancy rating and surplus of housing units as an aesthetics issue as well as a housing issue.
5. The landlord should not be allowed to invoke California Government Code Chapter 12.75. Demolition of units doesn't meet the qualifications of the property owner wanting to leave the rental market. In fact, the landlord has shown that they don't intend to leave the rental market by submitting this project for approval to create more rental housing. The DEIR and the 6220 West Yucca Street Project fail to include any Plan for Universal Right of Return in order to prevent a loss of population. Making the units RSO isn't enough to address the crisis of affordable housing, if the units are not qualifying for comparative affordable levels that are being charged to the current residents.

Based on the above five issues, I ask that Alternative #3 be selected and that the DEIR be revised in order to address all of the stated issues. A Universal Right of Return Plan must be adopted for the project while retaining the original certificate of occupancy, and then overlaying the additional certificate of occupancy in order to preserve the already existing RSO units by creating replacement units. Replacement units are not subject to California Government Code Chapter 12.75. By selecting Alternative #3, and by only constructing by-right with a Universal Plan of Right of Return, all housing and population issues would be addressed.

The largest conflict in this DEIR is in the Findings of Housing, Population, and Jobs in the proposed Hollywood Community Plan:

“Displacement of low-income renters is also a concern, but it is a social and economic impact, which is not a CEQA impact unless it results in an indirect physical impact. To the extent that the CEQA Guidelines could be interpreted as calling for an analysis of social and economic impacts or create a threshold that is a social and economic impact that does not involve a physical impact to the environment, the CEQA Guideline would be invalid. Based on this, an impact from displacement and/or gentrification is only a CEQA impact if it results in a physical impact to the environment. As identified in Appendix G, those physical impacts could be from construction of new housing. It may also be from transportation or other impacts related to people driving a farther distance. The CEQA Guidelines require a lead agency to consider the reasonably foreseeable indirect environmental consequences of a project's economic or social impacts. To require an analysis of the indirect physical impacts, the social and economic impacts must be supported by substantial evidence. An EIR would be required to analyze reasonably foreseeable, not speculative impacts, resulting from social and economic impacts.”

The above statement raises the question: do we have too much housing and have we met our housing needs if we are not going to look at RHENA—the current City housing element—and State law for affordability categories with a massive 12.2% vacancy rate as determined by the U.S. Census? Have we not met our housing needs with a 12.3% County-wide vacancy rating? Or an 8% City-wide vacancy rate? Isn't a massive overstock of empty housing a direct environmental impact leading to blight and other foreseeable

environmental conditions such as the current homelessness where the issue is not supply but affordability? *Without analyzing affordable housing requirements correlating with the housing needs then we aren't abiding by state law.*

There is no legal reason to disobey the requirements for inclusionary zoning. The proposed 6220 West Yucca Street Project sits within the boundaries of the Hollywood CRA redevelopment plan area. The requirement to have 15% area-wide *affordable housing* has not been met. This project will only serve to exacerbate the problem as we are on a trajectory of failure to meet the state law. DEIR fails to analyze the required level of affordable housing in the specific Hollywood CRA redevelopment plan area by claiming that affordable housing categories aren't an environmental issue. *However, affordable housing categories are required under state law, which means that the DEIR is not in compliance with all State, Community, and Specific Plans if the DEIR doesn't analyze the affordable categories.*

This DEIR and the 6220 West Yucca Street Project then is meant to be non-equitable as it is based only on the highest income bracket and intends to create an area only accessible for high-income earners. The plan fails to acknowledge if any other income level of renters will be displaced thru gentrification, or how it would affect low-income renters. The DEIR doesn't examine when too many types of units are created for one income level and the high vacancy rates that follows. This DEIR also fails to examine the blight that is induced by a high vacancy rate. Blight is then a conflict established under Aesthetics.

Another issue and conflict with Aesthetics is Goal 5A of the City of Los Angeles General Plan Framework Chapter 5, 2001. Goal 5A states:

“A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.”

How can a DEIR for a Community Plan claim to benefit existing and *future* residents while also claiming that it can't analyze speculative impacts that would protect current residents; but this DEIR can analyze speculative impacts for future residents? *How can a DEIR for a project call for diversity while creating economic discrimination by refusing to even analyze the refusal to incorporate the required affordable housing needs prior to invoking a density bonus?*

Based on the issues brought up in this letter, the DEIR is incomplete and conflicts with itself. The DEIR is not in compliance with State, Community, and Specific Plans. The DEIR needs to be re-written in order to address these issues. Or, the City must select Alternative #3 in conjunction with a Universal Right of Return Plan to become a by-right project in order to address the core of the housing needs in this community that are centered around displacement and not production.

As has been shown by the COVID-19 crisis, Hollywood has plenty of luxury housing sitting empty. We need to stop creating more luxury housing at the expense of displacing our community members.

Finally, it is outrageous that the Department of City Planning expects the community to contribute public comment during the COVID-19 crisis. I join with many other community members in demanding that this notice and the review period be withdrawn until 30 days after the governor and mayor lift the Stay at Home order and that the DEIR be redrafted to address the above issues.

Your name: _____

Your address: _____



Alan Como <alan.como@lacity.org>

RE: Environmental Case No: ENV-2014-4706-EIR

Amy Tannenbaum <atannenb@gmail.com>
To: alan.como@lacity.org

Fri, Jun 5, 2020 at 4:41 PM

June 5, 2020

Alan Como, AICP
City of Los Angeles, Department of City Planning
[221 North Figueroa Street, Suite 1350](#)
Los Angeles, CA 90012
Submitted electronically at alan.como@lacity.org

RE: Environmental Case No: ENV-2014-4706-EIR
Comments on Draft Environmental Impact Report (DEIR) for the Hollywood Community Plan Update 2 (HCPU2)
No. CPC-2016-1450-CPU

Dear Mr. Como

I am writing as a resident of LA County regarding the Draft Environment Impact Report on the proposed development for 6220 West Yucca Street Project (ENV-2014-4706-EIR).

I insist that the Department of City Planning immediately withdraw the Draft EIR project review until 30 days after the City's Stay at Home order is lifted.

Community members received the Draft EIR notification for 6220 West Yucca Street Project (ENV-2014-4706-EIR) on April 23, 2020. According to the notification, tenants and community members have from April 23, 2020 to June 8, 2020 to submit public comment on the Draft EIR.

It is entirely unacceptable that the Department of City Planning post the public notice for the Draft EIR when we are still under a Stay at Home order due to the COVID-19 health emergency. The notification to the tenants announcing public comment invites community members to make an appointment with the Planning Dept to review the DEIR. The same letter also suggests going to the library to review the DEIR. However, according to the Planning Dept website (<https://planning.lacity.org/contact/public-counters>), no appointments are being taken at this time. All Los Angeles libraries are also closed at this time. The lack of public access to the DEIR violates the process of public comment as required under CEQA.

As a community member I ask for the following:

1. The DEIR review time should not start when a Stay-at-Home order is in place. The public cannot access documents in public places such as the library, the planning department, or City Hall. In fact, the action of opening review time when the public is barred from accessing documents for review is the kind of corruption that critics cite with regards to the City's favoritism towards developers over communities. The review and comment period must be closed and postponed until after the lifting of the order.
2. Upon my own review of the DEIR and Plan, there is a failure to acknowledge the affordable housing requirements demanded by [CA HSC 33413 \(2\) \(A\) \(i\)](#) to be implemented under CA AB 1505. *The total base number of affordable units must be increased prior to any density bonus being applied. This must be re-analyzed in all projects asking for entitlements under any specific or community plan in place prior to Palmer v. City of Los Angeles.*

3. The DEIR under Housing and Population and Aesthetics fails to acknowledge the surplus of market-rate housing in the Hollywood area. It also creates a conflict by citing the SCAG projections which cite a population plateauing for the area which conflicts with a demand for more housing. The housing needs must be re-analyzed to include any developments who have been granted their entitlements, smaller by-right units, and housing currently under construction.
4. The DEIR does not quantify the impacts of gentrification and displacement on tenants in the area. *Displacement has a direct link to homelessness.* The DEIR has failed to analyze that link. The DEIR also fails to analyze when there is a large vacancy rating and surplus of housing units as an aesthetics issue as well as a housing issue.
5. The landlord should not be allowed to invoke California Government Code Chapter 12.75. Demolition of units doesn't meet the qualifications of the property owner wanting to leave the rental market. In fact, the landlord has shown that they don't intend to leave the rental market by submitting this project for approval to create more rental housing. The DEIR and the 6220 West Yucca Street Project fail to include any Plan for Universal Right of Return in order to prevent a loss of population. Making the units RSO isn't enough to address the crisis of affordable housing, if the units are not qualifying for comparative affordable levels that are being charged to the current residents.

Based on the above five issues, I ask that Alternative #3 be selected and that the DEIR be revised in order to address all of the stated issues. A Universal Right of Return Plan must be adopted for the project while retaining the original certificate of occupancy, and then overlaying the additional certificate of occupancy in order to preserve the already existing RSO units by creating replacement units. Replacement units are not subject to California Government Code Chapter 12.75. By selecting Alternative #3, and by only constructing by-right with a Universal Plan of Right of Return, all housing and population issues would be addressed.

The largest conflict in this DEIR is in the Findings of Housing, Population, and Jobs in the proposed Hollywood Community Plan:

“Displacement of low-income renters is also a concern, but it is a social and economic impact, which is not a CEQA impact unless it results in an indirect physical impact. To the extent that the CEQA Guidelines could be interpreted as calling for an analysis of social and economic impacts or create a threshold that is a social and economic impact that does not involve a physical impact to the environment, the CEQA Guideline would be invalid. Based on this, an impact from displacement and/or gentrification is only a CEQA impact if it results in a physical impact to the environment. As identified in Appendix G, those physical impacts could be from construction of new housing. It may also be from transportation or other impacts related to people driving a farther distance. The CEQA Guidelines require a lead agency to consider the reasonably foreseeable indirect environmental consequences of a project's economic or social impacts. To require an analysis of the indirect physical impacts, the social and economic impacts must be supported by substantial evidence. An EIR would be required to analyze reasonably foreseeable, not speculative impacts, resulting from social and economic impacts.”

The above statement raises the question: do we have too much housing and have we met our housing needs if we are not going to look at RHENA—the current City housing element—and State law for affordability categories with a massive 12.2% vacancy rate as determined by the U.S. Census? Have we not met our housing needs with a 12.3% County-wide vacancy rating? Or an 8% City-wide vacancy rate? Isn't a massive overstock of empty housing a direct environmental impact leading to blight and other foreseeable environmental conditions such as the current homelessness where the issue is not supply but affordability? *Without analyzing affordable housing requirements correlating with the housing needs then we aren't abiding by state law.*

There is no legal reason to disobey the requirements for inclusionary zoning. The proposed 6220 West Yucca Street Project sits within the boundaries of the Hollywood CRA redevelopment plan area. The requirement to have 15% area-wide *affordable housing* has not been met. This project will only serve to exacerbate the problem as we are on a trajectory of failure to meet the state law. DEIR fails to analyze the required level of affordable housing in the specific

Hollywood CRA redevelopment plan area by claiming that affordable housing categories aren't an environmental issue. *However, affordable housing categories are required under state law, which means that the DEIR is not in compliance with all State, Community, and Specific Plans if the DEIR doesn't analyze the affordable categories.*

This DEIR and the 6220 West Yucca Street Project then is meant to be non-equitable as it is based only on the highest income bracket and intends to create an area only accessible for high-income earners. The plan fails to acknowledge if any other income level of renters will be displaced thru gentrification, or how it would affect low-income renters. The DEIR doesn't examine when too many types of units are created for one income level and the high vacancy rates that follows. This DEIR also fails to examine the blight that is induced by a high vacancy rate. Blight is then a conflict established under Aesthetics.

Another issue and conflict with Aesthetics is Goal 5A of the City of Los Angeles General Plan Framework Chapter 5, 2001. Goal 5A states:

“A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.”

How can a DEIR for a Community Plan claim to benefit existing and *future* residents while also claiming that it can't analyze speculative impacts that would protect current residents; but this DEIR can analyze speculative impacts for future residents? *How can a DEIR for a project call for diversity while creating economic discrimination by refusing to even analyze the refusal to incorporate the required affordable housing needs prior to invoking a density bonus?*

Based on the issues brought up in this letter, the DEIR is incomplete and conflicts with itself. The DEIR is not in compliance with State, Community, and Specific Plans. The DEIR needs to be re-written in order to address these issues. Or, the City must select Alternative #3 in conjunction with a Universal Right of Return Plan to become a by-right project in order to address the core of the housing needs in this community that are centered around displacement and not production.

As has been shown by the COVID-19 crisis, Hollywood has plenty of luxury housing sitting empty. We need to stop creating more luxury housing at the expense of displacing our community members.

Finally, it is outrageous that the Department of City Planning expects the community to contribute public comment during the COVID-19 crisis. I join with many other community members in demanding that this notice and the review period be withdrawn until 30 days after the governor and mayor lift the Stay at Home order and that the DEIR be redrafted to address the above issues.

Sincerely,

Amy Tannenbaum

--

Amy Tannenbaum (she/her)



Alan Como <alan.como@lacity.org>

Environmental Case No: ENV-2014-4706-EIR

CARLA LUPITA ROWLEY <rowleycarla@ucla.edu>
To: alan.como@lacity.org

Fri, Jun 5, 2020 at 5:41 PM

June 5, 2020

Alan Como, AICP
City of Los Angeles, Department of City Planning
[221 North Figueroa Street, Suite 1350](#)
Los Angeles, CA 90012
Submitted electronically at alan.como@lacity.org

RE: Environmental Case No: ENV-2014-4706-EIR
Comments on Draft Environmental Impact Report (DEIR) for the Hollywood Community Plan Update 2 (HCPU2)
No. CPC-2016-1450-CPU

Dear Mr. Como

I am writing as a resident of Hollywood regarding the Draft Environment Impact Report on the proposed development for 6220 West Yucca Street Project (ENV-2014-4706-EIR).

I insist that the Department of City Planning immediately withdraw the Draft EIR project review until 30 days after the City's Stay at Home order is lifted.

Community members received the Draft EIR notification for 6220 West Yucca Street Project (ENV-2014-4706-EIR) on April 23, 2020. According to the notification, tenants and community members have from April 23, 2020 to June 8, 2020 to submit public comment on the Draft EIR.

It is entirely unacceptable that the Department of City Planning post the public notice for the Draft EIR when we are still under a Stay at Home order due to the COVID-19 health emergency. The notification to the tenants announcing public comment invites community members to make an appointment with the Planning Dept to review the DEIR. The same letter also suggests going to the library to review the DEIR. However, according to the Planning Dept website (<https://planning.lacity.org/contact/public-counters>), no appointments are being taken at this time. All Los Angeles libraries are also closed at this time. The lack of public access to the DEIR violates the process of public comment as required under CEQA.

As a community member I ask for the following:

1. The DEIR review time should not start when a Stay-at-Home order is in place. The public cannot access documents in public places such as the library, the planning department, or City Hall. In fact, the action of opening review time when the public is barred from accessing documents for review is the kind of corruption that critics cite with regards to the City's favoritism towards developers over communities. The review and comment period must be closed and postponed until after the lifting of the order.
2. Upon my own review of the DEIR and Plan, there is a failure to acknowledge the affordable housing requirements demanded by [CA HSC 33413 \(2\) \(A\) \(i\)](#) to be implemented under CA AB 1505. *The total base number of affordable units must be increased prior to any density bonus being applied. This must be re-analyzed in all projects asking for entitlements under any specific or community plan in place prior to Palmer v. City of Los Angeles.*

3. The DEIR under Housing and Population and Aesthetics fails to acknowledge the surplus of market-rate housing in the Hollywood area. It also creates a conflict by citing the SCAG projections which cite a population plateauing for the area which conflicts with a demand for more housing. The housing needs must be re-analyzed to include any developments who have been granted their entitlements, smaller by-right units, and housing currently under construction.
4. The DEIR does not quantify the impacts of gentrification and displacement on tenants in the area. *Displacement has a direct link to homelessness.* The DEIR has failed to analyze that link. The DEIR also fails to analyze when there is a large vacancy rating and surplus of housing units as an aesthetics issue as well as a housing issue.
5. The landlord should not be allowed to invoke California Government Code Chapter 12.75. Demolition of units doesn't meet the qualifications of the property owner wanting to leave the rental market. In fact, the landlord has shown that they don't intend to leave the rental market by submitting this project for approval to create more rental housing. The DEIR and the 6220 West Yucca Street Project fail to include any Plan for Universal Right of Return in order to prevent a loss of population. Making the units RSO isn't enough to address the crisis of affordable housing, if the units are not qualifying for comparative affordable levels that are being charged to the current residents.

Based on the above five issues, I ask that Alternative #3 be selected and that the DEIR be revised in order to address all of the stated issues. A Universal Right of Return Plan must be adopted for the project while retaining the original certificate of occupancy, and then overlaying the additional certificate of occupancy in order to preserve the already existing RSO units by creating replacement units. Replacement units are not subject to California Government Code Chapter 12.75. By selecting Alternative #3, and by only constructing by-right with a Universal Plan of Right of Return, all housing and population issues would be addressed.

The largest conflict in this DEIR is in the Findings of Housing, Population, and Jobs in the proposed Hollywood Community Plan:

“Displacement of low-income renters is also a concern, but it is a social and economic impact, which is not a CEQA impact unless it results in an indirect physical impact. To the extent that the CEQA Guidelines could be interpreted as calling for an analysis of social and economic impacts or create a threshold that is a social and economic impact that does not involve a physical impact to the environment, the CEQA Guideline would be invalid. Based on this, an impact from displacement and/or gentrification is only a CEQA impact if it results in a physical impact to the environment. As identified in Appendix G, those physical impacts could be from construction of new housing. It may also be from transportation or other impacts related to people driving a farther distance. The CEQA Guidelines require a lead agency to consider the reasonably foreseeable indirect environmental consequences of a project's economic or social impacts. To require an analysis of the indirect physical impacts, the social and economic impacts must be supported by substantial evidence. An EIR would be required to analyze reasonably foreseeable, not speculative impacts, resulting from social and economic impacts.”

The above statement raises the question: do we have too much housing and have we met our housing needs if we are not going to look at RHENA—the current City housing element—and State law for affordability categories with a massive 12.2% vacancy rate as determined by the U.S. Census? Have we not met our housing needs with a 12.3% County-wide vacancy rating? Or an 8% City-wide vacancy rate? Isn't a massive overstock of empty housing a direct environmental impact leading to blight and other foreseeable environmental conditions such as the current homelessness where the issue is not supply but affordability? *Without analyzing affordable housing requirements correlating with the housing needs then we aren't abiding by state law.*

There is no legal reason to disobey the requirements for inclusionary zoning. The proposed 6220 West Yucca Street Project sits within the boundaries of the Hollywood CRA redevelopment plan area. The requirement to have 15% area-wide *affordable housing* has not been met. This project will only serve to exacerbate the problem as we are on a trajectory of failure to meet the state law. DEIR fails to analyze the required level of affordable housing in the specific

Hollywood CRA redevelopment plan area by claiming that affordable housing categories aren't an environmental issue. *However, affordable housing categories are required under state law, which means that the DEIR is not in compliance with all State, Community, and Specific Plans if the DEIR doesn't analyze the affordable categories.*

This DEIR and the 6220 West Yucca Street Project then is meant to be non-equitable as it is based only on the highest income bracket and intends to create an area only accessible for high-income earners. The plan fails to acknowledge if any other income level of renters will be displaced thru gentrification, or how it would affect low-income renters. The DEIR doesn't examine when too many types of units are created for one income level and the high vacancy rates that follows. This DEIR also fails to examine the blight that is induced by a high vacancy rate. Blight is then a conflict established under Aesthetics.

Another issue and conflict with Aesthetics is Goal 5A of the City of Los Angeles General Plan Framework Chapter 5, 2001. Goal 5A states:

“A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.”

How can a DEIR for a Community Plan claim to benefit existing and *future* residents while also claiming that it can't analyze speculative impacts that would protect current residents; but this DEIR can analyze speculative impacts for future residents? *How can a DEIR for a project call for diversity while creating economic discrimination by refusing to even analyze the refusal to incorporate the required affordable housing needs prior to invoking a density bonus?*

Based on the issues brought up in this letter, the DEIR is incomplete and conflicts with itself. The DEIR is not in compliance with State, Community, and Specific Plans. The DEIR needs to be re-written in order to address these issues. Or, the City must select Alternative #3 in conjunction with a Universal Right of Return Plan to become a by-right project in order to address the core of the housing needs in this community that are centered around displacement and not production.

As has been shown by the COVID-19 crisis, Hollywood has plenty of luxury housing sitting empty. We need to stop creating more luxury housing at the expense of displacing our community members.

Finally, it is outrageous that the Department of City Planning expects the community to contribute public comment during the COVID-19 crisis. I join with many other community members in demanding that this notice and the review period be withdrawn until 30 days after the governor and mayor lift the Stay at Home order and that the DEIR be redrafted to address the above issues.

Carla Lupita Rowley



Alan Como <alan.como@lacity.org>

RE: Environmental Case No: ENV-2014-4706-EIR

Jessica Savio <jsaviowexler@gmail.com>
To: alan.como@lacity.org

Sun, Jun 7, 2020 at 8:48 PM

Dear Mr. Como

I am writing as a resident of Los Angeles regarding the Draft Environment Impact Report on the proposed development for [6220 West Yucca Street Project](#) (ENV-2014-4706-EIR).

I insist that the Department of City Planning immediately withdraw the Draft EIR project review until 30 days after the City's Stay at Home order is lifted.

Community members received the Draft EIR notification for 6220 West Yucca Street Project (ENV-2014-4706-EIR) on April 23, 2020. According to the notification, tenants and community members have from April 23, 2020 to June 8, 2020 to submit public comment on the Draft EIR.

It is entirely unacceptable that the Department of City Planning post the public notice for the Draft EIR when we are still under a Stay at Home order due to the COVID-19 health emergency. The notification to the tenants announcing public comment invites community members to make an appointment with the Planning Dept to review the DEIR. The same letter also suggests going to the library to review the DEIR. However, according to the Planning Dept website (<https://planning.lacity.org/contact/public-counters>), no appointments are being taken at this time. All Los Angeles libraries are also closed at this time. The lack of public access to the DEIR violates the process of public comment as required under CEQA.

As a community member I ask for the following:

1. The DEIR review time should not start when a Stay-at-Home order is in place. The public cannot access documents in public places such as the library, the planning department, or City Hall. In fact, the action of opening review time when the public is barred from accessing documents for review is the kind of corruption that critics cite with regards to the City's favoritism towards developers over communities. The review and comment period must be closed and postponed until after the lifting of the order.
2. Upon my own review of the DEIR and Plan, there is a failure to acknowledge the affordable housing requirements demanded by CA HSC 33413 (2)(A)(i) to be implemented under CA AB 1505. *The total base number of affordable units must be increased prior to any density bonus being applied. This must be re-analyzed in all projects asking for entitlements under any specific or community plan in place prior to Palmer v. City of Los Angeles.*
3. The DEIR under Housing and Population and Aesthetics fails to acknowledge the surplus of market-rate housing in the Hollywood area. It also creates a conflict by citing the SCAG projections which cite a population plateauing for the area which conflicts with a demand for more housing. The housing needs must be re-analyzed to include any developments who have been granted their entitlements, smaller by-right units, and housing currently under construction.

4. The DEIR does not quantify the impacts of gentrification and displacement on tenants in the area. *Displacement has a direct link to homelessness.* The DEIR has failed to analyze that link. The DEIR also fails to analyze when there is a large vacancy rating and surplus of housing units as an aesthetics issue as well as a housing issue.

5. The landlord should not be allowed to invoke California Government Code Chapter 12.75. Demolition of units doesn't meet the qualifications of the property owner wanting to leave the rental market. In fact, the landlord has shown that they don't intend to leave the rental market by submitting this project for approval to create more rental housing. The DEIR and the 6220 West Yucca Street Project fail to include any Plan for Universal Right of Return in order to prevent a loss of population. Making the units RSO isn't enough to address the crisis of affordable housing, if the units are not qualifying for comparative affordable levels that are being charged to the current residents.

Based on the above five issues, I ask that Alternative #3 be selected and that the DEIR be revised in order to address all of the stated issues. A Universal Right of Return Plan must be adopted for the project while retaining the original certificate of occupancy, and then overlaying the additional certificate of occupancy in order to preserve the already existing RSO units by creating replacement units. Replacement units are not subject to California Government Code Chapter 12.75. By selecting Alternative #3, and by only constructing by-right with a Universal Plan of Right of Return, all housing and population issues would be addressed.

The largest conflict in this DEIR is in the Findings of Housing, Population, and Jobs in the proposed Hollywood Community Plan:

“Displacement of low-income renters is also a concern, but it is a social and economic impact, which is not a CEQA impact unless it results in an indirect physical impact. To the extent that the CEQA Guidelines could be interpreted as calling for an analysis of social and economic impacts or create a threshold that is a social and economic impact that does not involve a physical impact to the environment, the CEQA Guideline would be invalid. Based on this, an impact from displacement and/or gentrification is only a CEQA impact if it results in a physical impact to the environment. As identified in Appendix G, those physical impacts could be from construction of new housing. It may also be from transportation or other impacts related to people driving a farther distance. The CEQA Guidelines require a lead agency to consider the reasonably foreseeable indirect environmental consequences of a project's economic or social impacts. To require an analysis of the indirect physical impacts, the social and economic impacts must be supported by substantial evidence. An EIR would be required to analyze reasonably foreseeable, not speculative impacts, resulting from social and economic impacts.”

The above statement raises the question: do we have too much housing and have we met our housing needs if we are not going to look at RHENA—the current City housing element—and State law for affordability categories with a massive 12.2% vacancy rate as determined by the U.S. Census? Have we not met our housing needs with a 12.3% County-wide vacancy rating? Or an 8% City-wide vacancy rate? Isn't a massive overstock of empty housing a direct environmental impact leading to blight and other foreseeable environmental conditions such as the current homelessness where the issue is not supply but affordability? *Without analyzing affordable housing requirements correlating with the housing needs then we aren't abiding by state law.*

There is no legal reason to disobey the requirements for inclusionary zoning. The proposed 6220 West Yucca Street Project sits within the boundaries of the Hollywood CRA redevelopment plan area. The requirement to have 15% area-wide *affordable housing* has not been met. This project will only serve to exacerbate the problem as we are on a trajectory of failure to meet the state law. DEIR fails to analyze the required level of affordable housing in the specific Hollywood CRA redevelopment plan area by claiming that affordable housing categories aren't an environmental

issue. *However, affordable housing categories are required under state law, which means that the DEIR is not in compliance with all State, Community, and Specific Plans if the DEIR doesn't analyze the affordable categories.*

This DEIR and the 6220 West Yucca Street Project then is meant to be non-equitable as it is based only on the highest income bracket and intends to create an area only accessible for high-income earners. The plan fails to acknowledge if any other income level of renters will be displaced thru gentrification, or how it would affect low-income renters. The DEIR doesn't examine when too many types of units are created for one income level and the high vacancy rates that follows. This DEIR also fails to examine the blight that is induced by a high vacancy rate. Blight is then a conflict established under Aesthetics.

Another issue and conflict with Aesthetics is Goal 5A of the City of Los Angeles General Plan Framework Chapter 5, 2001. Goal 5A states:

“A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.”

How can a DEIR for a Community Plan claim to benefit existing and *future* residents while also claiming that it can't analyze speculative impacts that would protect current residents; but this DEIR can analyze speculative impacts for future residents? *How can a DEIR for a project call for diversity while creating economic discrimination by refusing to even analyze the refusal to incorporate the required affordable housing needs prior to invoking a density bonus?*

Based on the issues brought up in this letter, the DEIR is incomplete and conflicts with itself. The DEIR is not in compliance with State, Community, and Specific Plans. The DEIR needs to be re-written in order to address these issues. Or, the City must select Alternative #3 in conjunction with a Universal Right of Return Plan to become a by-right project in order to address the core of the housing needs in this community that are centered around displacement and not production.

As has been shown by the COVID-19 crisis, Hollywood has plenty of luxury housing sitting empty. We need to stop creating more luxury housing at the expense of displacing our community members.

Finally, it is outrageous that the Department of City Planning expects the community to contribute public comment during the COVID-19 crisis. I join with many other community members in demanding that this notice and the review period be withdrawn until 30 days after the governor and mayor lift the Stay at Home order and that the DEIR be redrafted to address the above issues.

Jessica Savio



Alan Como <alan.como@lacity.org>

Comment RE: Environmental Case No: ENV-2014-4706-EIR

Norman Kemble <norkemble@gmail.com>
To: alan.como@lacity.org

Sun, Jun 7, 2020 at 12:12 PM

Dear Mr. Como,

Please see the attached letter as public comment with regards to the Draft Environment Impact Report on the proposed development for 6220 West Yucca Street Project (ENV-2014-4706-EIR).

Best,

Norman Kemble

 **200525 Yucca Argyle DEIR Ltr v2.pdf**
97K

May 25, 2020

Alan Como, AICP
City of Los Angeles, Department of City Planning

221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012
Submitted electronically at alan.como@lacity.org

RE: Environmental Case No: ENV-2014-4706-EIR
Comments on Draft Environmental Impact Report (DEIR) for the Hollywood
Community Plan Update 2 (HCPU2) No. CPC-2016-1450-CPU

Dear Mr. Como

I am writing as a resident of Koreatown regarding the Draft Environment
Impact Report on the proposed development for 6220 West Yucca Street
Project (ENV-2014-4706-EIR).

*I insist that the Department of City Planning immediately withdraw the Draft
EIR project review until 30 days after the City's Stay at Home order is lifted.*

Community members received the Draft EIR notification for 6220 West Yucca
Street Project (ENV-2014-4706-EIR) on April 23, 2020. According to the
notification, tenants and community members have from April 23, 2020 to June
8, 2020 to submit public comment on the Draft EIR.

It is entirely *unacceptable* that the Department of City Planning post the public
notice for the Draft EIR when we are still under a Stay at Home order due to
the COVID-19 health emergency. The notification to the tenants announcing
public comment invites community members to make an appointment with the
Planning Dept to review the DEIR. The same letter also suggests going to the
library to review the DEIR. However, according to the Planning Dept website
(<https://planning.lacity.org/contact/public-counters>), *no appointments* are being
taken at this time. All Los Angeles libraries are also *closed* at this time. The
lack of public access to the DEIR violates the process of public comment as
required under CEQA.

As a community member I ask for the following:

1. The DEIR review time should not start when a Stay-at-Home order is in place. The public cannot access documents in public places such as the library, the planning department, or City Hall. In fact, the action of opening review time when the public is barred from accessing documents for review is the kind of corruption that critics cite with regards to the City's favoritism towards developers over communities. The review and comment period must be closed and postponed until after the lifting of the order.

1

2. Upon my own review of the DEIR and Plan, there is a failure to acknowledge the affordable housing requirements demanded by **CA HSC 33413 (2) (A) (i)** to be implemented under CA AB 1505. *The total base number of affordable units must be increased prior to any density bonus being applied. This must be re-analyzed in all projects asking for entitlements under any specific or community plan in place prior to Palmer v. City of Los Angeles.*

3. The DEIR under Housing and Population and Aesthetics fails to acknowledge the surplus of market-rate housing in the Hollywood area. It also creates a conflict by citing the SCAG projections which cite a population plateauing for the area which conflicts with a demand for more housing. The housing needs must be re-analyzed to include any developments who have been granted their entitlements, smaller by-right units, and housing currently under construction.

4. The DEIR does not quantify the impacts of gentrification and displacement on tenants in the area. *Displacement has a direct link to homelessness.* The DEIR has failed to analyze that link. The DEIR also fails to analyze when there is a large vacancy rating and surplus of housing units as an aesthetics issue as well as a housing issue.

5. The landlord should not be allowed to invoke California Government Code Chapter 12.75. Demolition of units doesn't meet the qualifications of the property owner wanting to leave the rental market. In fact, the landlord has shown that they don't intend to leave the rental market by submitting this project for approval to create more rental housing. The DEIR and the 6220

West Yucca Street Project fail to include any Plan for Universal Right of Return in order to prevent a loss of population. Making the units RSO isn't enough to address the crisis of affordable housing, if the units are not qualifying for comparative affordable levels that are being charged to the current residents.

Based on the above five issues, I ask that Alternative #3 be selected and that the DEIR be revised in order to address all of the stated issues. A Universal Right of Return Plan must be adopted for the project while retaining the original certificate of occupancy, and then overlaying the additional certificate of occupancy in order to preserve the already existing RSO units by creating replacement units. Replacement units are not subject to California Government Code Chapter 12.75. By selecting Alternative #3, and by only constructing by-right with a Universal Plan of Right of Return, all housing and population issues would be addressed.

The largest conflict in this DEIR is in the Findings of Housing, Population, and Jobs in the proposed Hollywood Community Plan:

“Displacement of low-income renters is also a concern, but it is a social and economic impact, which is not a CEQA impact unless it results in an indirect physical impact. To the extent that the CEQA Guidelines could be interpreted as calling for an analysis of social and economic impacts or create a threshold that is a social and economic impact that does not involve a physical impact to the environment, the CEQA Guideline would be invalid. Based on this, an impact from

2

displacement and/or gentrification is only a CEQA impact if it results in a physical impact to the environment. As identified in Appendix G, those physical impacts could be from construction of new housing. It may also be from transportation or other impacts related to people driving a farther distance. The CEQA Guidelines require a lead agency to consider the reasonably foreseeable indirect environmental consequences of a project's economic or social impacts. To require an analysis of the indirect physical impacts, the social and economic impacts must be supported by substantial evidence. An EIR would be required to analyze reasonably foreseeable, not speculative impacts, resulting from social and economic impacts.”

The above statement raises the question: do we have too much housing and have we met our housing needs if we are not going to look at RHENA—the current City housing element—and State law for affordability categories with a massive 12.2% vacancy rate as determined by the U.S. Census? Have we not met our housing needs with a 12.3% County-wide vacancy rating? Or an 8% City-wide vacancy rate? Isn't a massive overstock of empty housing a direct environmental impact leading to blight and other foreseeable environmental conditions such as the current homelessness where the issue is not supply but affordability? *Without analyzing affordable housing requirements correlating with the housing needs then we aren't abiding by state law.*

There is no legal reason to disobey the requirements for inclusionary zoning. The proposed 6220 West Yucca Street Project sits within the boundaries of the Hollywood CRA redevelopment plan area. The requirement to have 15% area-wide *affordable housing* has not been met. This project will only serve to exacerbate the problem as we are on a trajectory of failure to meet the state law. DEIR fails to analyze the required level of affordable housing in the specific Hollywood CRA redevelopment plan area by claiming that affordable housing categories aren't an environmental issue. *However, affordable housing categories are required under state law, which means that the DEIR is not in compliance with all State, Community, and Specific Plans if the DEIR doesn't analyze the affordable categories.*

This DEIR and the 6220 West Yucca Street Project then is meant to be non-equitable as it is based only on the highest income bracket and intends to create an area only accessible for high-income earners. The plan fails to acknowledge if any other income level of renters will be displaced thru gentrification, or how it would affect low-income renters. The DEIR doesn't examine when too many types of units are created for one income level and the high vacancy rates that follows. This DEIR also fails to examine the blight that is induced by a high vacancy rate. Blight is then a conflict established under Aesthetics.

Another issue and conflict with Aesthetics is Goal 5A of the City of Los Angeles General Plan Framework Chapter 5, 2001. Goal 5A states:

“A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds

on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.”

How can a DEIR for a Community Plan claim to benefit existing and *future* residents while also claiming that it can’t analyze speculative impacts that would protect current residents; but this DEIR can analyze

3

speculative impacts for future residents? *How can a DEIR for a project call for diversity while creating economic discrimination by refusing to even analyze the refusal to incorporate the required affordable housing needs prior to invoking a density bonus?*

Based on the issues brought up in this letter, the DEIR is incomplete and conflicts with itself. The DEIR is not in compliance with State, Community, and Specific Plans. The DEIR needs to be re-written in order to address these issues. Or, the City must select Alternative #3 in conjunction with a Universal Right of Return Plan to become a by-right project in order to address the core of the housing needs in this community that are centered around displacement and not production.

As has been shown by the COVID-19 crisis, Hollywood has plenty of luxury housing sitting empty. We need to stop creating more luxury housing at the expense of displacing our community members.

Finally, it is outrageous that the Department of City Planning expects the community to contribute public comment during the COVID-19 crisis. I join with many other community members in demanding that this notice and the review period be withdrawn until 30 days after the governor and mayor lift the Stay at Home order and that the DEIR be redrafted to address the above issues.

Your name: Norman Kemble

Your address: 320 S Hobart Blvd, LA, CA 90020

4



Alan Como <alan.como@lacity.org>

Environmental Case No: ENV-2014-4706-EIR

David Reiman <david.m.reiman@gmail.com>
To: alan.como@lacity.org

Mon, Jun 8, 2020 at 1:52 PM

June 8, 2020

Alan Como, AICP
City of Los Angeles, Department of City Planning
[221 North Figueroa Street, Suite 1350](#)
[Los Angeles, CA 90012](#)
Submitted electronically at alan.como@lacity.org

RE: Environmental Case No: ENV-2014-4706-EIR
Comments on Draft Environmental Impact Report (DEIR) for the Hollywood Community Plan Update 2 (HCPU2)
No. CPC-2016-1450-CPU

Dear Mr. Como

I am writing as a resident of Los Angeles regarding the Draft Environment Impact Report on the proposed development for [6220 West Yucca Street Project](#) (ENV-2014-4706-EIR).

Echoing my concerned neighbors, I insist that the Department of City Planning immediately withdraw the Draft EIR project review until 30 days after the City's Stay at Home order is lifted.

Community members received the Draft EIR notification for 6220 West Yucca Street Project (ENV-2014-4706-EIR) on April 23, 2020. According to the notification, tenants and community members have from April 23, 2020 to June 8, 2020 to submit public comment on the Draft EIR.

It is entirely unacceptable that the Department of City Planning post the public notice for the Draft EIR when we are still under a Stay at Home order due to the COVID-19 health emergency. The notification to the tenants announcing public comment invites community members to make an appointment with the Planning Dept to review the DEIR. The same letter also suggests going to the library to review the DEIR. However, according to the Planning Dept website (<https://planning.lacity.org/contact/public-counters>), no appointments are being taken at this time. All Los Angeles libraries are also closed at this time. The lack of public access to the DEIR violates the process of public comment as required under CEQA.

As a community member I ask for the following:

1. The DEIR review time should not start when a Stay-at-Home order is in place. The public cannot access documents in public places such as the library, the planning department, or City Hall. In fact, the action of opening review time when the public is barred from accessing documents for review is the kind of corruption that critics cite with regards to the City's favoritism towards developers over communities. The review and comment period must be closed and postponed until after the lifting of the order.
2. Upon my own review of the DEIR and Plan, there is a failure to acknowledge the affordable housing requirements demanded by [CA HSC 33413 \(2\) \(A\) \(i\)](#) to be implemented under CA AB 1505. *The total base number of affordable units must be increased prior to any density bonus being applied. This must be re-analyzed in all projects asking for entitlements under any specific or community plan in place prior to Palmer v. City of Los Angeles.*

3. The DEIR under Housing and Population and Aesthetics fails to acknowledge the surplus of market-rate housing in the Hollywood area. It also creates a conflict by citing the SCAG projections which cite a population plateauing for the area which conflicts with a demand for more housing. The housing needs must be re-analyzed to include any developments who have been granted their entitlements, smaller by-right units, and housing currently under construction.
4. The DEIR does not quantify the impacts of gentrification and displacement on tenants in the area. *Displacement has a direct link to homelessness.* The DEIR has failed to analyze that link. The DEIR also fails to analyze when there is a large vacancy rating and surplus of housing units as an aesthetics issue as well as a housing issue.
5. The landlord should not be allowed to invoke California Government Code Chapter 12.75. Demolition of units doesn't meet the qualifications of the property owner wanting to leave the rental market. In fact, the landlord has shown that they don't intend to leave the rental market by submitting this project for approval to create more rental housing. The DEIR and the 6220 West Yucca Street Project fail to include any Plan for Universal Right of Return in order to prevent a loss of population. Making the units RSO isn't enough to address the crisis of affordable housing, if the units are not qualifying for comparative affordable levels that are being charged to the current residents.

Based on the above five issues, I ask that Alternative #3 be selected and that the DEIR be revised in order to address all of the stated issues. A Universal Right of Return Plan must be adopted for the project while retaining the original certificate of occupancy, and then overlaying the additional certificate of occupancy in order to preserve the already existing RSO units by creating replacement units. Replacement units are not subject to California Government Code Chapter 12.75. By selecting Alternative #3, and by only constructing by-right with a Universal Plan of Right of Return, all housing and population issues would be addressed.

The largest conflict in this DEIR is in the Findings of Housing, Population, and Jobs in the proposed Hollywood Community Plan:

“Displacement of low-income renters is also a concern, but it is a social and economic impact, which is not a CEQA impact unless it results in an indirect physical impact. To the extent that the CEQA Guidelines could be interpreted as calling for an analysis of social and economic impacts or create a threshold that is a social and economic impact that does not involve a physical impact to the environment, the CEQA Guideline would be invalid. Based on this, an impact from displacement and/or gentrification is only a CEQA impact if it results in a physical impact to the environment. As identified in Appendix G, those physical impacts could be from construction of new housing. It may also be from transportation or other impacts related to people driving a farther distance. The CEQA Guidelines require a lead agency to consider the reasonably foreseeable indirect environmental consequences of a project's economic or social impacts. To require an analysis of the indirect physical impacts, the social and economic impacts must be supported by substantial evidence. An EIR would be required to analyze reasonably foreseeable, not speculative impacts, resulting from social and economic impacts.”

The above statement raises the question: do we have too much housing and have we met our housing needs if we are not going to look at RHENA—the current City housing element—and State law for affordability categories with a massive 12.2% vacancy rate as determined by the U.S. Census? Have we not met our housing needs with a 12.3% County-wide vacancy rating? Or an 8% City-wide vacancy rate? Isn't a massive overstock of empty housing a direct environmental impact leading to blight and other foreseeable environmental conditions such as the current homelessness where the issue is not supply but affordability? *Without analyzing affordable housing requirements correlating with the housing needs then we aren't abiding by state law.*

There is no legal reason to disobey the requirements for inclusionary zoning. The proposed 6220 West Yucca Street Project sits within the boundaries of the Hollywood CRA redevelopment plan area. The requirement to have 15% area-wide *affordable housing* has not been met. This project will only serve to exacerbate the problem as we are on a trajectory of failure to meet the state law. DEIR fails to analyze the required level of affordable housing in the specific Hollywood CRA redevelopment plan area by claiming that affordable housing categories aren't an environmental issue. *However, affordable housing categories are required under state law, which means that the DEIR is not in compliance with all State, Community, and Specific Plans if the DEIR doesn't analyze the affordable categories.*

This DEIR and the 6220 West Yucca Street Project then is meant to be non-equitable as it is based only on the highest income bracket and intends to create an area only accessible for high-income earners. The plan fails to acknowledge if any other income level of renters will be displaced thru gentrification, or how it would affect low-income renters. The DEIR doesn't examine when too many types of units are created for one income level and the high vacancy rates that follows. This DEIR also fails to examine the blight that is induced by a high vacancy rate. Blight is then a conflict established under Aesthetics.

Another issue and conflict with Aesthetics is Goal 5A of the City of Los Angeles General Plan Framework Chapter 5, 2001. Goal 5A states:

“A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.”

How can a DEIR for a Community Plan claim to benefit existing and *future* residents while also claiming that it can't analyze speculative impacts that would protect current residents; but this DEIR can analyze speculative impacts for future residents? *How can a DEIR for a project call for diversity while creating economic discrimination by refusing to even analyze the refusal to incorporate the required affordable housing needs prior to invoking a density bonus?*

Based on the issues brought up in this letter, the DEIR is incomplete and conflicts with itself. The DEIR is not in compliance with State, Community, and Specific Plans. The DEIR needs to be re-written in order to address these issues. Or, the City must select Alternative #3 in conjunction with a Universal Right of Return Plan to become a by-right project in order to address the core of the housing needs in this community that are centered around displacement and not production.

As has been shown by the COVID-19 crisis, Hollywood has plenty of luxury housing sitting empty. We need to stop creating more luxury housing at the expense of displacing our community members.

Finally, it is outrageous that the Department of City Planning expects the community to contribute public comment during the COVID-19 crisis. I join with many other community members in demanding that this notice and the review period be withdrawn until 30 days after the governor and mayor lift the Stay at Home order and that the DEIR be redrafted to address the above issues.

David Reiman



Alan Como <alan.como@lacity.org>

Environmental Case No: ENV-2014-4706-EIR

Dont Rhine <dont.rhine@gmail.com>
 To: alan.como@lacity.org

Mon, Jun 8, 2020 at 12:45 PM

Alan Como, AICP
 City of Los Angeles, Department of City Planning
 221 North Figueroa Street, Suite 1350
 Los Angeles, CA 90012
 Submitted electronically at alan.como@lacity.org

RE: Environmental Case No: ENV-2014-4706-EIR
 Comments on Draft Environmental Impact Report (DEIR) for the Hollywood Community Plan Update 2 (HCPU2) No. CPC-2016-1450-CPU

Dear Mr. Como

I am writing as a resident of Hollywood regarding the Draft Environmental Impact Report on the proposed development for 6220 West Yucca Street Project (ENV-2014-4706-EIR).

I insist that the Department of City Planning immediately withdraw the Draft EIR project review until 30 days after the City's Stay at Home order is lifted.

Community members received the Draft EIR notification for 6220 West Yucca Street Project (ENV-2014-4706-EIR) on April 23, 2020. According to the notification, tenants and community members have from April 23, 2020 to June 8, 2020 to submit public comment on the Draft EIR.

It is entirely unacceptable that the Department of City Planning post the public notice for the Draft EIR when we are still under a Stay at Home order due to the COVID-19 health emergency. The notification to the tenants announcing public comment invites community members to make an appointment with the Planning Dept to review the DEIR. The same letter also suggests going to the library to review the DEIR. However, according to the Planning Dept website (<https://planning.lacity.org/contact/public-counters>), no appointments are being taken at this time. All Los Angeles libraries are also closed at this time. The lack of public access to the DEIR violates the process of public comment as required under CEQA.

As a community member I ask for the following:

1. The DEIR review time should not start when a Stay-at-Home order is in place. The public cannot access documents in public places such as the library, the planning department, or City Hall. In fact, the action of opening review time when the public is barred from accessing documents for review is the kind of corruption that critics cite with regards to the City's favoritism towards developers over communities. The review and comment period must be closed and postponed until after the lifting of the order.
2. Upon my own review of the DEIR and Plan, there is a failure to acknowledge the affordable housing requirements demanded by CA HSC 33413 (2) (A) (i) to be implemented under CA AB 1505. *The total base number of affordable units must be increased prior to any density bonus being applied. This must be re-analyzed in all projects asking for entitlements under any specific or community plan in place prior to Palmer v. City of Los Angeles.*
3. The DEIR under Housing and Population and Aesthetics fails to acknowledge the surplus of market-rate housing in the Hollywood area. It also creates a conflict by citing the SCAG projections which cite a population plateauing for the area which conflicts with a demand for more housing. The housing needs must be re-analyzed to include any developments who have been granted their entitlements, smaller by-right units, and housing currently under construction.
4. The DEIR does not quantify the impacts of gentrification and displacement on tenants in the area. *Displacement has a direct link to homelessness.* The DEIR has failed to analyze that link. The DEIR also fails to analyze when there is a large vacancy rating and surplus of housing units as an aesthetics issue as well as a housing issue.

5. The landlord should not be allowed to invoke California Government Code Chapter 12.75. Demolition of units doesn't meet the qualifications of the property owner wanting to leave the rental market. In fact, the landlord has shown that they don't intend to leave the rental market by submitting this project for approval to create more rental housing. The DEIR and the 6220 West Yucca Street Project fail to include any Plan for Universal Right of Return in order to prevent a loss of population. Making the units RSO isn't enough to address the crisis of affordable housing, if the units are not qualifying for comparative affordable levels that are being charged to the current residents.

Based on the above five issues, I ask that Alternative #3 be selected and that the DEIR be revised in order to address all of the stated issues. A Universal Right of Return Plan must be adopted for the project while retaining the original certificate of occupancy, and then overlaying the additional certificate of occupancy in order to preserve the already existing RSO units by creating replacement units. Replacement units are not subject to California Government Code Chapter 12.75. By selecting Alternative #3, and by only constructing by-right with a Universal Plan of Right of Return, all housing and population issues would be addressed.

The largest conflict in this DEIR is in the Findings of Housing, Population, and Jobs in the proposed Hollywood Community Plan:

"Displacement of low-income renters is also a concern, but it is a social and economic impact, which is not a CEQA impact unless it results in an indirect physical impact. To the extent that the CEQA Guidelines could be interpreted as calling for an analysis of social and economic impacts or create a threshold that is a social and economic impact that does not involve a physical impact to the environment, the CEQA Guideline would be invalid. Based on this, an impact from displacement and/or gentrification is only a CEQA impact if it results in a physical impact to the environment. As identified in Appendix G, those physical impacts could be from construction of new housing. It may also be from transportation or other impacts related to people driving a farther distance. The CEQA Guidelines require a lead agency to consider the reasonably foreseeable indirect environmental consequences of a project's economic or social impacts. To require an analysis of the indirect physical impacts, the social and economic impacts must be supported by substantial evidence. An EIR would be required to analyze reasonably foreseeable, not speculative impacts, resulting from social and economic impacts."

The above statement raises the question: do we have too much housing and have we met our housing needs if we are not going to look at RHENA—the current City housing element—and State law for affordability categories with a massive 12.2% vacancy rate as determined by the U.S. Census? Have we not met our housing needs with a 12.3% County-wide vacancy rating? Or an 8% City-wide vacancy rate? Isn't a massive overstock of empty housing a direct environmental impact leading to blight and other foreseeable environmental conditions such as the current homelessness where the issue is not supply but affordability? *Without analyzing affordable housing requirements correlating with the housing needs then we aren't abiding by state law.*

There is no legal reason to disobey the requirements for inclusionary zoning. The proposed 6220 West Yucca Street Project sits within the boundaries of the Hollywood CRA redevelopment plan area. The requirement to have 15% area-wide *affordable housing* has not been met. This project will only serve to exacerbate the problem as we are on a trajectory of failure to meet the state law. DEIR fails to analyze the required level of affordable housing in the specific Hollywood CRA redevelopment plan area by claiming that affordable housing categories aren't an environmental issue. *However, affordable housing categories are required under state law, which means that the DEIR is not in compliance with all State, Community, and Specific Plans if the DEIR doesn't analyze the affordable categories.*

This DEIR and the 6220 West Yucca Street Project then is meant to be non-equitable as it is based only on the highest income bracket and intends to create an area only accessible for high-income earners. The plan fails to acknowledge if any other income level of renters will be displaced thru gentrification, or how it would affect low-income renters. The DEIR doesn't examine when too many types of units are created for one income level and the high vacancy rates that follows. This DEIR also fails to examine the blight that is induced by a high vacancy rate. Blight is then a conflict established under Aesthetics.

Another issue and conflict with Aesthetics is Goal 5A of the City of Los Angeles General Plan Framework Chapter 5, 2001. Goal 5A states:

"A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales."

How can a DEIR for a Community Plan claim to benefit existing and *future* residents while also claiming that it can't analyze speculative impacts that would protect current residents; but this DEIR can analyze speculative impacts for future residents? *How can a DEIR for a project call for diversity while creating economic discrimination by refusing to even analyze the refusal to incorporate the required affordable housing needs prior to invoking a density bonus?*

Based on the issues brought up in this letter, the DEIR is incomplete and conflicts with itself. The DEIR is not in compliance with State, Community, and Specific Plans. The DEIR needs to be re-written in order to address these issues. Or, the City must select Alternative #3 in conjunction with a Universal Right of Return Plan to become a by-right project in

6/8/2020

FORM - RHINE

City of Los Angeles Mail - Environmental Case No: ENV-2014-4706-EIR

order to address the core of the housing needs in this community that are centered around displacement and not production.

As has been shown by the COVID-19 crisis, Hollywood has plenty of luxury housing sitting empty. We need to stop creating more luxury housing at the expense of displacing our community members.

Finally, it is outrageous that the Department of City Planning expects the community to contribute public comment during the COVID-19 crisis. I join with many other community members in demanding that this notice and the review period be withdrawn until 30 days after the governor and mayor lift the Stay at Home order and that the DEIR be redrafted to address the above issues.

Regards,
Dont Rhine
2244 North Gower Street
Los Angeles, CA 90068
dont.rhine@gmail.com

Council District 4



Alan Como <alan.como@lacity.org>

6220 West Yucca Street Project (ENV-2014-4706-EIR)

JoAnn Paolantonio <paolantonio_joann@hotmail.com>
To: "alan.como@lacity.org" <alan.como@lacity.org>

Mon, Jun 8, 2020 at 9:20 AM

June 8, 2020

Alan Como, AICP
City of Los Angeles, Department of City
Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012
Submitted electronically at
alan.como@lacity.org

RE: Environmental Case No: ENV-2014-
4706-EIR

Comments on Draft Environmental Impact
Report (DEIR) for the Hollywood Community
Plan Update 2 (HCPU2) No. CPC-2016-1450-
CPU

Dear Mr. Como

I am writing as a resident of Los Angeles regarding the Draft Environment Impact Report on the proposed development for 6220 West Yucca Street Project (ENV-2014-4706-EIR).

I insist that the Department of City Planning immediately withdraw the Draft EIR project review until 30 days after the City's Stay at Home order is lifted.

Community members received the Draft EIR notification for **6220 West Yucca Street Project (ENV-2014-4706-EIR)** on April 23, 2020. According to the notification, tenants and community members have from April 23, 2020 to June 8, 2020 to submit public comment on the Draft EIR.

It is entirely unacceptable that the Department of City Planning post the public notice for the

Draft EIR when we are still under a Stay at Home order due to the COVID-19 health emergency. The notification to the tenants announcing public comment invites community members to make an appointment with the Planning Dept to review the DEIR. The same letter also suggests going to the library to review the DEIR. However, according to the Planning Dept website (<https://planning.lacity.org/contact/public-counters>), no appointments are being taken at this time. All Los Angeles libraries are also closed at this time. The lack of public access to the DEIR violates the process of public comment as required under CEQA.

As a community member I ask for the following:

1. The DEIR review time should not start when a Stay-at-Home order is in place. The public cannot access documents in public

places such as the library, the planning department, or City Hall. In fact, the action of opening review time when the public is barred from accessing documents for review is the kind of corruption that critics cite with regards to the City's favoritism towards developers over communities. The review and comment period must be closed and postponed until after the lifting of the order.

2. Upon my own review of the DEIR and Plan, there is a failure to acknowledge the affordable housing requirements demanded by CA HSC 33413 (2) (A) (i) to be implemented under CA AB 1505. The total base number of affordable units must be increased prior to any density bonus being applied. This must be re-analyzed in all projects asking for entitlements under any specific or community plan in place prior to *Palmer v. City of Los Angeles*.

3. The DEIR under Housing and Population and Aesthetics fails to acknowledge the surplus of market-rate housing in the Hollywood area. It also creates a conflict by citing the SCAG projections which cite a population plateauing for the area which conflicts with a demand for more housing. The housing needs must be re-analyzed to include any developments who have been granted their entitlements, smaller by-right units, and housing currently under construction.

4. The DEIR does not quantify the impacts of gentrification and displacement on tenants in the area. Displacement has a direct link to homelessness. The DEIR has failed to analyze that link. The DEIR also fails to analyze when there is a large vacancy rating and surplus of housing units as an aesthetics issue as well as a housing issue.

5. The landlord should not be allowed to invoke California Government Code Chapter 12.75. Demolition of units doesn't meet the qualifications of the property owner wanting to leave the rental market. In fact, the landlord has shown that they don't intend to leave the rental market by submitting this project for approval to create more rental housing. The DEIR and the 6220 West Yucca Street Project fail to include any Plan for Universal Right of Return in order to prevent a loss of population. Making the units RSO isn't enough to address the crisis of affordable housing, if the units are not qualifying for comparative affordable levels that are being charged to the current residents.

Based on the above five issues, I ask that Alternative #3 be selected and that the DEIR be revised in order to address all of the stated issues. A Universal Right of Return Plan must be adopted for the project while retaining the

original certificate of occupancy, and then overlaying the additional certificate of occupancy in order to preserve the already existing RSO units by creating replacement units. Replacement units are not subject to California Government Code Chapter 12.75. By selecting Alternative #3, and by only constructing by-right with a Universal Plan of Right of Return, all housing and population issues would be addressed.

The largest conflict in this DEIR is in the Findings of Housing, Population, and Jobs in the proposed Hollywood Community Plan:

“Displacement of low-income renters is also a concern, but it is a social and economic impact, which is not a CEQA impact unless it results in an indirect physical impact. To the extent that the CEQA Guidelines could be interpreted as calling for an analysis of social and economic impacts or create a threshold

that is a social and economic impact that does not involve a physical impact to the environment, the CEQA Guideline would be invalid. Based on this, an impact from displacement and/or gentrification is only a CEQA impact if it results in a physical impact to the environment. As identified in Appendix G, those physical impacts could be from construction of new housing. It may also be from transportation or other impacts related to people driving a farther distance. The CEQA Guidelines require a lead agency to consider the reasonably foreseeable indirect environmental consequences of a project's economic or social impacts. To require an analysis of the indirect physical impacts, the social and economic impacts must be supported by substantial evidence. An EIR would be required to analyze reasonably foreseeable, not speculative impacts, resulting from social and economic impacts.”

The above statement raises the question: do we have too much housing and have we met our housing needs if we are not going to look at RHENA—the current City housing element—and State law for affordability categories with a massive 12.2% vacancy rate as determined by the U.S. Census? Have we not met our housing needs with a 12.3% County-wide vacancy rating? Or an 8% City-wide vacancy rate? Isn't a massive overstock of empty housing a direct environmental impact leading to blight and other foreseeable environmental conditions such as the current homelessness where the issue is not supply but affordability? Without analyzing affordable housing requirements correlating with the housing needs then we aren't abiding by state law.

There is no legal reason to disobey the requirements for inclusionary zoning. The proposed 6220 West Yucca Street Project sits

within the boundaries of the Hollywood CRA redevelopment plan area. The requirement to have 15% area-wide affordable housing has not been met. This project will only serve to exacerbate the problem as we are on a trajectory of failure to meet the state law. DEIR fails to analyze the required level of affordable housing in the specific Hollywood CRA redevelopment plan area by claiming that affordable housing categories aren't an environmental issue. However, affordable housing categories are required under state law, which means that the DEIR is not in compliance with all State, Community, and Specific Plans if the DEIR doesn't analyze the affordable categories.

This DEIR and the [6220 West Yucca Street Project](#) then is meant to be non-equitable as it is based only on the highest income bracket and intends to create an area only accessible for high-income earners. The plan fails to

acknowledge if any other income level of renters will be displaced thru gentrification, or how it would affect low-income renters. The DEIR doesn't examine when too many types of units are created for one income level and the high vacancy rates that follows. This DEIR also fails to examine the blight that is induced by a high vacancy rate. Blight is then a conflict established under Aesthetics.

Another issue and conflict with Aesthetics is Goal 5A of the City of Los Angeles General Plan Framework Chapter 5, 2001. Goal 5A states:

“A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.”

How can a DEIR for a Community Plan claim to benefit existing and future residents while also claiming that it can't analyze speculative impacts that would protect current residents; but this DEIR can analyze speculative impacts for future residents? How can a DEIR for a project call for diversity while creating economic discrimination by refusing to even analyze the refusal to incorporate the required affordable housing needs prior to invoking a density bonus?

Based on the issues brought up in this letter, the DEIR is incomplete and conflicts with itself. The DEIR is not in compliance with State, Community, and Specific Plans. The DEIR needs to be re-written in order to address these issues. Or, the City must select Alternative #3 in conjunction with a Universal Right of Return Plan to become a by-right project in order to address the core of the housing needs in this community that are

centered around displacement and not production.

As has been shown by the COVID-19 crisis, Hollywood has plenty of luxury housing sitting empty. We need to stop creating more luxury housing at the expense of displacing our community members.

Finally, it is outrageous that the Department of City Planning expects the community to contribute public comment during the COVID-19 crisis. I join with many other community members in demanding that this notice and the review period be withdrawn until 30 days after the governor and mayor lift the Stay at Home order and that the DEIR be redrafted to address the above issues.

Thank you.

Sincerely,

JoAnn Paolantonio
155 S. Manhattan Pl., Apt 14
Los Angeles, CA 90004

Wishing you continued success,
JoAnn Paolantonio
Call/text 818.203.4250

Sent from the astral plane



Alan Como <alan.como@lacity.org>

6220 West Yucca Street Project (ENV-2014-4706-EIR)

Paula PengWins <paulapengwins@gmail.com>
To: alan.como@lacity.org

Mon, Jun 8, 2020 at 9:44 AM

June 8, 2020

Alan Como, AICP
City of Los Angeles, Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012
Submitted electronically at alan.como@lacity.org

RE: Environmental Case No: ENV-2014-4706-EIR
Comments on Draft Environmental Impact Report (DEIR) for the Hollywood Community Plan Update 2 (HCPU2)
No. CPC-2016-1450-CPU

Dear Mr. Como

I am writing as a resident of Hollywood regarding the Draft Environment Impact Report on the proposed development for [6220 West Yucca Street Project \(ENV-2014-4706-EIR\)](#).

I insist that the Department of City Planning immediately withdraw the Draft EIR project review until 30 days after the City's Stay at Home order is lifted.

Community members received the Draft EIR notification for [6220 West Yucca Street Project \(ENV-2014-4706-EIR\)](#) on April 23, 2020. According to the notification, tenants and community members have from April 23, 2020 to June 8, 2020 to submit public comment on the Draft EIR.

It is entirely unacceptable that the Department of City Planning post the public notice for the Draft EIR when we are still under a Stay at Home order due to the COVID-19 health emergency. The notification to the tenants announcing public comment invites community members to make an appointment with the Planning Dept to review the DEIR. The same letter also suggests going to the library to review the DEIR. However, according to the Planning Dept website (<https://planning.lacity.org/contact/public-counters>), no appointments are being taken at this time. All Los Angeles libraries are also closed at this time. The lack of public access to the DEIR violates the process of public comment as required under CEQA.

As a community member I ask for the following:

1. The DEIR review time should not start when a Stay-at-Home order is in place. The public cannot access documents in public places such as the library, the planning department, or City Hall. In fact, the action of opening review time when the public is barred from accessing documents for review is the kind of corruption that critics cite with regards to the City's favoritism towards developers over communities. The review and comment period must be closed and postponed until after the lifting of the order.
2. Upon my own review of the DEIR and Plan, there is a failure to acknowledge the affordable housing requirements demanded by [CA HSC 33413 \(2\) \(A\) \(i\)](#) to be implemented under CA AB 1505. *The total base number of affordable units must be increased prior to any density bonus being applied. This must be re-analyzed in all projects asking for entitlements under any specific or community plan in place prior to Palmer v. City of Los Angeles.*

3. The DEIR under Housing and Population and Aesthetics fails to acknowledge the surplus of market-rate housing in the Hollywood area. It also creates a conflict by citing the SCAG projections which cite a population plateauing for the area which conflicts with a demand for more housing. The housing needs must be re-analyzed to include any developments who have been granted their entitlements, smaller by-right units, and housing currently under construction.
4. The DEIR does not quantify the impacts of gentrification and displacement on tenants in the area. *Displacement has a direct link to homelessness.* The DEIR has failed to analyze that link. The DEIR also fails to analyze when there is a large vacancy rating and surplus of housing units as an aesthetics issue as well as a housing issue.
5. The landlord should not be allowed to invoke California Government Code Chapter 12.75. Demolition of units doesn't meet the qualifications of the property owner wanting to leave the rental market. In fact, the landlord has shown that they don't intend to leave the rental market by submitting this project for approval to create more rental housing. The DEIR and the [6220 West Yucca Street Project](#) fail to include any Plan for Universal Right of Return in order to prevent a loss of population. Making the units RSO isn't enough to address the crisis of affordable housing, if the units are not qualifying for comparative affordable levels that are being charged to the current residents.

Based on the above five issues, I ask that Alternative #3 be selected and that the DEIR be revised in order to address all of the stated issues. A Universal Right of Return Plan must be adopted for the project while retaining the original certificate of occupancy, and then overlaying the additional certificate of occupancy in order to preserve the already existing RSO units by creating replacement units. Replacement units are not subject to California Government Code Chapter 12.75. By selecting Alternative #3, and by only constructing by-right with a Universal Plan of Right of Return, all housing and population issues would be addressed.

The largest conflict in this DEIR is in the Findings of Housing, Population, and Jobs in the proposed Hollywood Community Plan:

“Displacement of low-income renters is also a concern, but it is a social and economic impact, which is not a CEQA impact unless it results in an indirect physical impact. To the extent that the CEQA Guidelines could be interpreted as calling for an analysis of social and economic impacts or create a threshold that is a social and economic impact that does not involve a physical impact to the environment, the CEQA Guideline would be invalid. Based on this, an impact from displacement and/or gentrification is only a CEQA impact if it results in a physical impact to the environment. As identified in Appendix G, those physical impacts could be from construction of new housing. It may also be from transportation or other impacts related to people driving a farther distance. The CEQA Guidelines require a lead agency to consider the reasonably foreseeable indirect environmental consequences of a project's economic or social impacts. To require an analysis of the indirect physical impacts, the social and economic impacts must be supported by substantial evidence. An EIR would be required to analyze reasonably foreseeable, not speculative impacts, resulting from social and economic impacts.”

The above statement raises the question: do we have too much housing and have we met our housing needs if we are not going to look at RHENA—the current City housing element—and State law for affordability categories with a massive 12.2% vacancy rate as determined by the U.S. Census? Have we not met our housing needs with a 12.3% County-wide vacancy rating? Or an 8% City-wide vacancy rate? Isn't a massive overstock of empty housing a direct environmental impact leading to blight and other foreseeable environmental conditions such as the current homelessness where the issue is not supply but affordability? *Without analyzing affordable housing requirements correlating with the housing needs then we aren't abiding by state law.*

There is no legal reason to disobey the requirements for inclusionary zoning. The proposed [6220 West Yucca Street Project](#) sits within the boundaries of the Hollywood CRA redevelopment plan area. The requirement to have 15% area-wide *affordable housing* has not been met. This project will only serve to exacerbate the problem as we are on a trajectory of failure to meet the state law. DEIR fails to analyze the required level of affordable housing in the specific Hollywood CRA redevelopment plan area by claiming that affordable housing categories aren't an environmental issue. *However, affordable housing categories are required under state law, which means that the DEIR is not in compliance with all State, Community, and Specific Plans if the DEIR doesn't analyze the affordable categories.*

This DEIR and the [6220 West Yucca Street](#) Project then is meant to be non-equitable as it is based only on the highest income bracket and intends to create an area only accessible for high-income earners. The plan fails to acknowledge if any other income level of renters will be displaced thru gentrification, or how it would affect low-income renters. The DEIR doesn't examine when too many types of units are created for one income level and the high vacancy rates that follows. This DEIR also fails to examine the blight that is induced by a high vacancy rate. Blight is then a conflict established under Aesthetics.

Another issue and conflict with Aesthetics is Goal 5A of the City of Los Angeles General Plan Framework Chapter 5, 2001. Goal 5A states:

“A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.”

How can a DEIR for a Community Plan claim to benefit existing and *future* residents while also claiming that it can't analyze speculative impacts that would protect current residents; but this DEIR can analyze speculative impacts for future residents? *How can a DEIR for a project call for diversity while creating economic discrimination by refusing to even analyze the refusal to incorporate the required affordable housing needs prior to invoking a density bonus?*

Based on the issues brought up in this letter, the DEIR is incomplete and conflicts with itself. The DEIR is not in compliance with State, Community, and Specific Plans. The DEIR needs to be re-written in order to address these issues. Or, the City must select Alternative #3 in conjunction with a Universal Right of Return Plan to become a by-right project in order to address the core of the housing needs in this community that are centered around displacement and not production.

As has been shown by the COVID-19 crisis, Hollywood has plenty of luxury housing sitting empty. We need to stop creating more luxury housing at the expense of displacing our community members.

Finally, it is outrageous that the Department of City Planning expects the community to contribute public comment during the COVID-19 crisis. I join with many other community members in demanding that this notice and the review period be withdrawn until 30 days after the governor and mayor lift the Stay at Home order and that the DEIR be redrafted to address the above issues.

Paula Peng
[3127 Livonia Ave](#)
[Los Angeles, CA 90034](#)



Alan Como <alan.como@lacity.org>

Environmental Case No: ENV-2014-4706-EIR

Nadia Sadeghpour <nadia.joyes@gmail.com>
To: alan.como@lacity.org

Mon, Jun 8, 2020 at 1:05 AM

June 8, 2020

Alan Como, AICP
City of Los Angeles, Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012
Submitted electronically at alan.como@lacity.org

RE: Environmental Case No: ENV-2014-4706-EIR
Comments on Draft Environmental Impact Report (DEIR) for the Hollywood Community Plan Update 2 (HCPU2) No. CPC-2016-1450-CPU

Dear Mr. Como,

I am writing as a resident of Hollywood regarding the Draft Environment Impact Report on the proposed development for 6220 West Yucca Street Project (ENV-2014-4706-EIR).

I insist that the Department of City Planning immediately withdraw the Draft EIR project review until 30 days after the City's Stay at Home order is lifted.

Community members received the Draft EIR notification for 6220 West Yucca Street Project (ENV-2014-4706-EIR) on April 23, 2020. According to the notification, tenants and community members have from April 23, 2020 to June 8, 2020 to submit public comment on the Draft EIR.

It is entirely *unacceptable* that the Department of City Planning post the public notice for the Draft EIR when we are still under a Stay at Home order due to the COVID-19 health emergency. The notification to the tenants announcing public comment invites community members to make an appointment with the Planning Dept to review the DEIR. The same letter also suggests going to the library to review the DEIR. However, according to the Planning Dept website (<https://planning.lacity.org/contact/public-counters>), *no appointments* are being taken at this time. All Los Angeles libraries are also *closed* at this time. The lack of public access to the DEIR violates the process of public comment as required under CEQA.

As a community member I ask for the following:

1. The DEIR review time should not start when a Stay-at-Home order is in place. The public cannot access documents in public places such as the library, the planning department, or City Hall. In fact, the action of opening review time when the public is barred from accessing documents for review is the kind of corruption that critics cite with regards to the City's favoritism towards developers over communities. The review and comment period must be closed and postponed until after the lifting of the order.
2. Upon my own review of the DEIR and Plan, there is a failure to acknowledge the affordable housing requirements demanded by *CA HSC 33413 (2)(A)(i)* to be implemented under CA AB 1505. *The total base number of affordable units must be increased prior to any density bonus being applied. This must be re-analyzed in all projects asking for entitlements under any specific or community plan in place prior to Palmer v. City of Los Angeles.*

3. The DEIR under Housing and Population and Aesthetics fails to acknowledge the surplus of market-rate housing in the Hollywood area. It also creates a conflict by citing the SCAG projections which cite a population plateauing for the area which conflicts with a demand for more housing. The housing needs must be re-analyzed to include any developments who have been granted their entitlements, smaller by-right units, and housing currently under construction.
4. The DEIR does not quantify the impacts of gentrification and displacement on tenants in the area. *Displacement has a direct link to homelessness*. The DEIR has failed to analyze that link. The DEIR also fails to analyze when there is a large vacancy rating and surplus of housing units as an aesthetics issue as well as a housing issue.
5. The landlord should not be allowed to invoke California Government Code Chapter 12.75. Demolition of units doesn't meet the qualifications of the property owner wanting to leave the rental market. In fact, the landlord has shown that they don't intend to leave the rental market by submitting this project for approval to create more rental housing. The DEIR and the 6220 West Yucca Street Project fail to include any Plan for Universal Right of Return in order to prevent a loss of population. Making the units RSO isn't enough to address the crisis of affordable housing, if the units are not qualifying for comparative affordable levels that are being charged to the current residents.

Based on the above five issues, I ask that Alternative #3 be selected and that the DEIR be revised in order to address all of the stated issues. A Universal Right of Return Plan must be adopted for the project while retaining the original certificate of occupancy, and then overlaying the additional certificate of occupancy in order to preserve the already existing RSO units by creating replacement units. Replacement units are not subject to California Government Code Chapter 12.75. By selecting Alternative #3, and by only constructing by-right with a Universal Plan of Right of Return, all housing and population issues would be addressed.

The largest conflict in this DEIR is in the Findings of Housing, Population, and Jobs in the proposed Hollywood Community Plan:

“Displacement of low-income renters is also a concern, but it is a social and economic impact, which is not a CEQA impact unless it results in an indirect physical impact. To the extent that the CEQA Guidelines could be interpreted as calling for an analysis of social and economic impacts or create a threshold that is a social and economic impact that does not involve a physical impact to the environment, the CEQA Guideline would be invalid. Based on this, an impact from displacement and/or gentrification is only a CEQA impact if it results in a physical impact to the environment. As identified in Appendix G, those physical impacts could be from construction of new housing. It may also be from transportation or other impacts related to people driving a farther distance. The CEQA Guidelines require a lead agency to consider the reasonably foreseeable indirect environmental consequences of a project's economic or social impacts. To require an analysis of the indirect physical impacts, the social and economic impacts must be supported by substantial evidence. An EIR would be required to analyze reasonably foreseeable, not speculative impacts, resulting from social and economic impacts.”

The above statement raises the question: do we have too much housing and have we met our housing needs if we are not going to look at RHENA—the current City housing element—and State law for affordability categories with a massive 12.2% vacancy rate as determined by the U.S. Census? Have we not met our housing needs with a 12.3% County-wide vacancy rating? Or an 8% City-wide vacancy rate? Isn't a massive overstock of empty housing a direct environmental impact leading to blight and other foreseeable environmental conditions such as the current homelessness where the issue is not supply but affordability? *Without analyzing affordable housing requirements correlating with the housing needs then we aren't abiding by state law.*

There is no legal reason to disobey the requirements for inclusionary zoning. The proposed 6220 West Yucca Street Project sits within the boundaries of the Hollywood CRA redevelopment plan area. The requirement to have 15% area-wide *affordable housing* has not been met. This project will only serve to exacerbate the problem as we are on a trajectory of failure to meet the state law. DEIR fails to analyze the required level of affordable housing in the specific Hollywood CRA redevelopment plan area by claiming that affordable housing categories aren't an environmental issue. *However, affordable housing categories are required under state law, which means that the DEIR is not in compliance with all State, Community, and Specific Plans if the DEIR doesn't analyze the affordable categories.*

This DEIR and the 6220 West Yucca Street Project then is meant to be non-equitable as it is based only on the highest income bracket and intends to create an area only accessible for high-income earners. The plan fails to acknowledge if any other income level of renters will be displaced thru gentrification, or how it would affect low-income renters. The DEIR doesn't examine when too many types of units are created for one income level and the high vacancy rates that follows. This DEIR also fails to examine the blight that is induced by a high vacancy rate. Blight is then a conflict established under Aesthetics.

Another issue and conflict with Aesthetics is Goal 5A of the City of Los Angeles General Plan Framework Chapter 5, 2001. Goal 5A states:

“A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.”

How can a DEIR for a Community Plan claim to benefit existing and *future* residents while also claiming that it can't analyze speculative impacts that would protect current residents; but this DEIR can analyze speculative impacts for future residents? *How can a DEIR for a project call for diversity while creating economic discrimination by refusing to even analyze the refusal to incorporate the required affordable housing needs prior to invoking a density bonus?*

Based on the issues brought up in this letter, the DEIR is incomplete and conflicts with itself. The DEIR is not in compliance with State, Community, and Specific Plans. The DEIR needs to be re-written in order to address these issues. Or, the City must select Alternative #3 in conjunction with a Universal Right of Return Plan to become a by-right project in order to address the core of the housing needs in this community that are centered around displacement and not production.

As has been shown by the COVID-19 crisis, Hollywood has plenty of luxury housing sitting empty. We need to stop creating more luxury housing at the expense of displacing our community members.

Finally, it is outrageous that the Department of City Planning expects the community to contribute public comment during the COVID-19 crisis. I join with many other community members in demanding that this notice and the review period be withdrawn until 30 days after the governor and mayor lift the Stay at Home order and that the DEIR be redrafted to address the above issues.

Nadia Sadeghpour
[2700 Cahuenga Blvd](#)



Alan Como <alan.como@lacity.org>

Comments on DEIR Case No: ENV-2014-4706-EIR for the Hollywood Community Plan Update 2 (HCPU2) No. CPC-2016-1450-CPU

Starr Scesniak <scesniak@gmail.com>

Mon, Jun 8, 2020 at 9:18 PM

To: alan.como@lacity.org

Dear Mr. Como

How in the COVID world is it possible that the Department of City Planning would not extend a deadline to review a Draft Environmental Impact Report while we as a community remain limited in our ability to access plans, review the DEIR at a public library, or discuss with neighbors and community members the contents?

I insist that the Department of City Planning immediately withdraw the Draft EIR project review until 30 days after the City's Stay at Home order is lifted.

Community members received the Draft EIR notification for 6220 West Yucca Street Project (ENV-2014-4706-EIR) on April 23, 2020. According to the notification, tenants and community members have from April 23, 2020 to June 8, 2020 to submit public comment on the Draft EIR.

As a community member I ask for the following:

1. The DEIR review time should not start when a Stay-at-Home order is in place.
2. There is an inadequate response to affordable housing requirements in the DEIR. And there is zero reflection of low income housing needs. This must be re-analyzed.
 - a. The DEIR fails to acknowledge the existing unoccupied rates of market-rate housing in Hollywood.
3. The DEIR does not sufficiently quantify the impacts of gentrification and displacement on tenants in the area. Displacement has a direct link to homelessness.
 - a. Gentrification affects communities of colors, communities of colors have been at the forefront of a national movement against police brutality and systemic oppression over the last several weeks. Not only must this be scrutinized for this project, more time must be granted to do so.
4. The landlord should not be allowed to invoke California Government Code Chapter 12.75. Demolition of units doesn't meet the qualifications of the property owner wanting to leave the rental market. In fact, the landlord has shown that they don't intend to leave the rental market by submitting this project for approval to create more rental housing. The DEIR and the 6220 West Yucca Street Project fail to include any Plan for Universal Right of Return in order to prevent a loss of population. Making the units RSO isn't enough to address the crisis of affordable housing, if the units are not qualifying for comparative affordable levels that are being charged to the current residents.
5. A Universal Right of Return Plan must be adopted for the project while retaining the original certificate of occupancy, and then overlaying the additional certificate of occupancy in order to preserve the already existing RSO units by creating replacement units. Replacement units are not subject to California Government Code Chapter 12.75. By selecting Alternative #3, and by only constructing by-right with a Universal Plan of Right of Return, all housing and population issues would be addressed.

I join with many other community members in demanding that this notice and the review period be withdrawn until 30 days after the governor and mayor lift the Stay at Home order and that the DEIR be redrafted to address the above issues.

Sincerely,

FORM - SCESNIAK

6/9/2020 City of Los Angeles Mail - Comments on DEIR Case No: ENV-2014-4706-EIR for the Hollywood Community Plan Update 2 (HCPU2) No. ...

Starr Scesniak

1837 N La Brea Ave #1

Los Angeles, CA 90046



Alan Como <alan.como@lacity.org>

RE: Environmental Case No: ENV-2014-4706-EIR

a sandnes <aaron.sandnes@gmail.com>
 To: alan.como@lacity.org

Tue, Jun 9, 2020 at 2:06 PM

June 8, 2020

Alan Como, AICP
 City of Los Angeles, Department of City Planning
 221 North Figueroa Street, Suite 1350
 Los Angeles, CA 90012
 Submitted electronically at alan.como@lacity.org

RE: Environmental Case No: ENV-2014-4706-EIR
 Comments on Draft Environmental Impact Report (DEIR) for the Hollywood Community Plan Update 2 (HCPU2) No. CPC-2016-1450-CPU

Dear Mr. Como

I am writing as a resident of Hollywood regarding the Draft Environment Impact Report on the proposed development for 6220 West Yucca Street Project (ENV-2014-4706-EIR).

I insist that the Department of City Planning immediately withdraw the Draft EIR project review until 30 days after the City's Stay at Home order is lifted.

Community members received the Draft EIR notification for 6220 West Yucca Street Project (ENV-2014-4706-EIR) on April 23, 2020. According to the notification, tenants and community members have from April 23, 2020 to June 8, 2020 to submit public comment on the Draft EIR.

It is entirely unacceptable that the Department of City Planning post the public notice for the Draft EIR when we are still under a Stay at Home order due to the COVID-19 health emergency. The notification to the tenants announcing public comment invites community members to make an appointment with the Planning Dept to review the DEIR. The same letter also suggests going to the library to review the DEIR. However, according to the Planning Dept website (<https://planning.lacity.org/contact/public-counters>), no appointments are being taken at this time. All Los Angeles libraries are also closed at this time. The lack of public access to the DEIR violates the process of public comment as required under CEQA.

As a community member I ask for the following:

- The DEIR review time should not start when a Stay-at-Home order is in place. The public cannot access documents in public places such as the library, the planning department, or City Hall. In fact, the action of opening review time when the public is barred from accessing documents for review is the kind of corruption that critics cite with regards to the City's favoritism towards developers over communities. The review and comment period must be closed and postponed until after the lifting of the order.
- Upon my own review of the DEIR and Plan, there is a failure to acknowledge the affordable housing requirements demanded by CA HSC 33413 (2) (A) (i) to be implemented under CA AB 1505. *The total base number of affordable units must be increased prior to any density bonus being applied. This must be re-analyzed in all projects asking for entitlements under any specific or community plan in place prior to Palmer v. City of Los Angeles.*
- The DEIR under Housing and Population and Aesthetics fails to acknowledge the surplus of market-rate housing in the Hollywood area. It also creates a conflict by citing the SCAG projections which cite a population plateauing for the area which conflicts with a demand for more housing. The housing needs must be re-analyzed to include any developments who have been granted their entitlements, smaller by-right units, and housing currently under construction.
- The DEIR does not quantify the impacts of gentrification and displacement on tenants in the area. *Displacement has a direct link to homelessness.* The DEIR has failed to analyze that link. The DEIR also fails to analyze when there is a large vacancy rating and surplus of housing units as an aesthetics issue as well as a housing issue.
- The landlord should not be allowed to invoke California Government Code Chapter 12.75. Demolition of units doesn't meet the qualifications of the property owner wanting to leave the rental market. In fact, the landlord has shown that they don't intend to leave the rental market by submitting this project for approval to create more rental housing. The DEIR and the 6220 West Yucca Street Project fail to include any Plan for Universal Right of Return in order to prevent a loss of population. Making the units RSO isn't enough to address the crisis of affordable housing, if the units are not qualifying for comparative affordable levels that are being charged to the current residents.

Based on the above five issues, I ask that Alternative #3 be selected and that the DEIR be revised in order to address all of the stated issues. A Universal Right of Return Plan must be adopted for the project while retaining the original certificate of occupancy, and then overlaying the additional certificate of occupancy in order to preserve the already existing RSO units by creating replacement units. Replacement units are not subject to California Government Code Chapter

12.75. By selecting Alternative #3, and by only constructing by-right with a Universal Plan of Right of Return, all housing and population issues would be addressed.

The largest conflict in this DEIR is in the Findings of Housing, Population, and Jobs in the proposed Hollywood Community Plan:

“Displacement of low-income renters is also a concern, but it is a social and economic impact, which is not a CEQA impact unless it results in an indirect physical impact. To the extent that the CEQA Guidelines could be interpreted as calling for an analysis of social and economic impacts or create a threshold that is a social and economic impact that does not involve a physical impact to the environment, the CEQA Guideline would be invalid. Based on this, an impact from displacement and/or gentrification is only a CEQA impact if it results in a physical impact to the environment. As identified in Appendix G, those physical impacts could be from construction of new housing. It may also be from transportation or other impacts related to people driving a farther distance. The CEQA Guidelines require a lead agency to consider the reasonably foreseeable indirect environmental consequences of a project’s economic or social impacts. To require an analysis of the indirect physical impacts, the social and economic impacts must be supported by substantial evidence. An EIR would be required to analyze reasonably foreseeable, not speculative impacts, resulting from social and economic impacts.”

The above statement raises the question: do we have too much housing and have we met our housing needs if we are not going to look at RHENA—the current City housing element—and State law for affordability categories with a massive 12.2% vacancy rate as determined by the U.S. Census? Have we not met our housing needs with a 12.3% County-wide vacancy rating? Or an 8% City-wide vacancy rate? Isn’t a massive overstock of empty housing a direct environmental impact leading to blight and other foreseeable environmental conditions such as the current homelessness where the issue is not supply but affordability? *Without analyzing affordable housing requirements correlating with the housing needs then we aren’t abiding by state law.*

There is no legal reason to disobey the requirements for inclusionary zoning. The proposed 6220 West Yucca Street Project sits within the boundaries of the Hollywood CRA redevelopment plan area. The requirement to have 15% area-wide *affordable housing* has not been met. This project will only serve to exacerbate the problem as we are on a trajectory of failure to meet the state law. DEIR fails to analyze the required level of affordable housing in the specific Hollywood CRA redevelopment plan area by claiming that affordable housing categories aren’t an environmental issue. *However, affordable housing categories are required under state law, which means that the DEIR is not in compliance with all State, Community, and Specific Plans if the DEIR doesn’t analyze the affordable categories.*

This DEIR and the 6220 West Yucca Street Project then is meant to be non-equitable as it is based only on the highest income bracket and intends to create an area only accessible for high-income earners. The plan fails to acknowledge if any other income level of renters will be displaced thru gentrification, or how it would affect low-income renters. The DEIR doesn’t examine when too many types of units are created for one income level and the high vacancy rates that follows. This DEIR also fails to examine the blight that is induced by a high vacancy rate. Blight is then a conflict established under Aesthetics.

Another issue and conflict with Aesthetics is Goal 5A of the City of Los Angeles General Plan Framework Chapter 5, 2001. Goal 5A states:

“A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.”

How can a DEIR for a Community Plan claim to benefit existing and *future* residents while also claiming that it can’t analyze speculative impacts that would protect current residents; but this DEIR can analyze speculative impacts for future residents? *How can a DEIR for a project call for diversity while creating economic discrimination by refusing to even analyze the refusal to incorporate the required affordable housing needs prior to invoking a density bonus?*

Based on the issues brought up in this letter, the DEIR is incomplete and conflicts with itself. The DEIR is not in compliance with State, Community, and Specific Plans. The DEIR needs to be re-written in order to address these issues. Or, the City must select Alternative #3 in conjunction with a Universal Right of Return Plan to become a by-right project in order to address the core of the housing needs in this community that are centered around displacement and not production.

As has been shown by the COVID-19 crisis, Hollywood has plenty of luxury housing sitting empty. We need to stop creating more luxury housing at the expense of displacing our community members.

Finally, it is outrageous that the Department of City Planning expects the community to contribute public comment during the COVID-19 crisis. I join with many other community members in demanding that this notice and the review period be withdrawn until 30 days after the governor and mayor lift the Stay at Home order and that the DEIR be redrafted to address the above issues.

Aaron Sandnes
141 S Sycamore Ave Los Angeles Ca 90036



Alan Como <alan.como@lacity.org>

Notice of Completion and Availability for the 6220 West Yucca Street Project Draft EIR (ENV-2014-4706-EIR)

Susan Hunter <heysuzhunter@gmail.com>

Thu, Apr 23, 2020 at 11:28 AM

To: Alan Como <alan.como@lacity.org>, vince.bertoni@lacity.org, Matthew Glesne <matthew.glesne@lacity.org>

Cc: Miki Jackson <mikijackson@mac.com>, Liza Brereton <Liza.brereton@aidshhealth.org>

Mr. Como,

I am in receipt of this draft EIR notification. However, I am unsure why public notice for a draft EIR is being sent out when we are still under a Stay at Home order due to COVID-19. We can't access the library to review the file. As such, I am asking that with limited public resources, this notice and it's review period be suspended until the lifting of the order. It is incomprehensible that anyone who is having to deal with loss of jobs, loss of family members, or battling this sickness would be expected to have an ability to review this information.

1A-1

So I am respectfully asking that this, and all project EIR's reviews, be withdrawn until 30 days after the order is lifted.
Susan Hunter

On Thu, Apr 23, 2020 at 9:28 AM Alan Como <alan.como@lacity.org> wrote:

Hello,

You are receiving this email because you are an interested party and/or a mandated recipient of the Notice of Completion and Availability for the 6220 West Yucca Street Project Draft Environmental Impact Report (EIR).

This email is to inform you that the City has released the Draft EIR for the 6220 West Yucca Street Project, which is now available for public review on the City's website at the following location: <https://planning.lacity.org/development-services/eir/6220-yucca-project>. In addition, digital copies may be provided via CD-ROM or USB flash drive. Due to current events surrounding COVID-19, the City is taking additional steps to provide the public access to documents. Should you need special accommodations, please contact me directly.

The comment period for the Draft EIR is from April 23, 2020 to June 8, 2020. If you wish to provide comments, please reference the Environmental Case No. above, and submit them in writing by Monday, June 8, 2020, no later than 4:00 p.m.

Written comments may be submitted via:

Mail:

Alan Como, AICP
City of Los Angeles, Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

Email: alan.como@lacity.org

Please see the attached Notice for more information. Thank you.

LOS ANGELES
CITY PLANNING

Alan Como, AICP
City Planner
Los Angeles City Planning

221 N. Figueroa St., Room 1350
Los Angeles, CA 90012
Planning4LA.org
T: (213) 847-3633



LETTER NUMBER IND 1A



Alan Como <alan.como@lacity.org>

Notice of Completion and Availability for the 6220 West Yucca Street Project Draft EIR (ENV-2014-4706-EIR)

Susan Hunter <heysuzhunter@gmail.com>

Thu, Apr 30, 2020 at 10:50 AM

To: Alan Como <alan.como@lacity.org>, vince.bertoni@lacity.org, Matthew Glesne <matthew.glesne@lacity.org>

Cc: Miki Jackson <mikijackson@mac.com>, Liza Brereton <Liza.brereton@aidshhealth.org>

Mr. Como,

I am still awaiting a response to my email.

Why is the City Planning Department opening review and comment periods on large scale developments while the population is under a Stay-at-Home order? We can't access the DEIR at the library, or any documents at the Planning Department, or documents at City Hall.

So why is the public being barred access to public documents while the developer is allowed to proceed forward on large scale projects?

I am asking that any review periods be suspended while the Stay-at-Home order is in place and for 30 days afterwards. We have to deal with paying rent, being sick, and the loss of loved ones. Does the Planning Department really think this is acceptable to prevent us from looking at documents while asking for input? How is this not being done as a way of showing favoritism to developers over the community?

Please withdraw all review and comment requests on all projects until after the order is lifted.

Susan Hunter

On Thu, Apr 23, 2020 at 11:28 AM Susan Hunter <heysuzhunter@gmail.com> wrote:

Mr. Como,

I am in receipt of this draft EIR notification. However, I am unsure why public notice for a draft EIR is being sent out when we are still under a Stay at Home order due to COVID-19. We can't access the library to review the file. As such, I am asking that with limited public resources, this notice and it's review period be suspended until the lifting of the order. It is incomprehensible that anyone who is having to deal with loss of jobs, loss of family members, or battling this sickness would be expected to have an ability to review this information.

So I am respectfully asking that this, and all project EIR's reviews, be withdrawn until 30 days after the order is lifted.
Susan Hunter

On Thu, Apr 23, 2020 at 9:28 AM Alan Como <alan.como@lacity.org> wrote:

Hello,

You are receiving this email because you are an interested party and/or a mandated recipient of the Notice of Completion and Availability for the 6220 West Yucca Street Project Draft Environmental Impact Report (EIR).

This email is to inform you that the City has released the Draft EIR for the 6220 West Yucca Street Project, which is now available for public review on the City's website at the following location: <https://planning.lacity.org/development-services/eir/6220-yucca-project>. In addition, digital copies may be provided via CD-ROM or USB flash drive. Due to current events surrounding COVID-19, the City is taking additional steps to provide the public access to documents. Should you need special accommodations, please contact me directly.

The comment period for the Draft EIR is from April 23, 2020 to June 8, 2020. If you wish to provide comments, please reference the Environmental Case No. above, and submit them in writing by Monday, June 8, 2020, no later than 4:00 p.m.

Written comments may be submitted via:

Mail:

Alan Como, AICP

1B-1

City of Los Angeles, Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

Email: alan.como@lacity.org

Please see the attached Notice for more information. Thank you.



LOS ANGELES
CITY PLANNING

Alan Como, AICP
City Planner
Los Angeles City Planning

221 N. Figueroa St., Room 1350
Los Angeles, CA 90012
Planning4LA.org
T: (213) 847-3633





Alan Como <alan.como@lacity.org>

Notice of Completion and Availability for the 6220 West Yucca Street Project Draft EIR (ENV-2014-4706-EIR)

Susan Hunter <heysuzhunter@gmail.com>

Thu, Apr 30, 2020 at 1:40 PM

To: Alan Como <alan.como@lacity.org>

Cc: Vince Bertoni <vince.bertoni@lacity.org>, Matthew Glesne <matthew.glesne@lacity.org>, Miki Jackson <mikijackson@mac.com>, Liza Brereton <Liza.brereton@aidshhealth.org>

Hi Alan,

I would like to clarify my ask. I am not asking that the comment period be extended. I am saying it need to be halted completely until after the stay at home order is lifted. Then the planning department can open the comment and review period after 30 days after the period is lifted.

Are you saying that the planning department and city hall are open for people to come in and review the file in person? Has the planning department taken into consideration that internet access is a privilege, and is not a publicly provided service? And that many homes in LA do not have internet?

Has the planning department taken into consideration that only the EIR is available online? How do I know what copies of documents in the file I will need without looking at the file first?

The decision made by the planning staff that having only the EIR available online or at the cost of \$5 isn't inclusive of members of the public who don't own a computer or have internet. So how is the city going to provide access for those people?

To be clear, what you are proposing isn't enough to meet public involvement needs. So what is the planning departments plan for those who don't have internet? Are you opening up the planning department to come and look at the rest of the file outside of the EIR? When?

Susan

On Thu, Apr 30, 2020 at 12:24 PM Alan Como <alan.como@lacity.org> wrote:

Susan,

Thank you for your email.

The City has received your request for a time extension to the 6220 West Yucca Draft Environmental Impact Report (Draft EIR) comment period in light of COVID-19.

Per CEQA Guidelines Section 15105, the public review period for a Draft EIR should not be less than 30 days nor should it be longer than 60 days, except under unusual circumstances. While we agree that these are unprecedented times, as indicated in the Notice of Availability and Completion (NOA) for the 6220 West Yucca Draft EIR, the Draft EIR, in its entirety, is available for review on our website at this link: <https://planning.lacity.org/development-services/eir/6220-yucca-project>

If you are having difficulty accessing the document in any way (i.e. if links are not working or if the attachments cannot be viewed) please let us know immediately, as we are committed to making the document as accessible as possible from the safety of your own home, and in compliance with the "Stay at Home" Order. In addition, as also indicated in the NOA, anyone can also request a CD-ROM, flash drive or hard copy of the Draft EIR.

While we understand that the "Stay at Home" Order prevents neighborhood groups from meeting in person, please be advised that CEQA does not require people to meet and confer on the EIR, and should not preclude anyone from reviewing the EIR and providing comments.

Furthermore, pursuant to the Governor's Executive Order N-54-20, signed April 22, 2020, deadlines for filing, noticing, and posting of CEQA documents with county clerk offices have been suspended for 60 days. However, deadlines for public review and comment periods for CEQA documents, such as for draft EIRs, have not been suspended and the provisions governing public review remain unchanged.

As such, please be advised that, as the Draft EIR remains accessible to all individuals, the comment period will not be

extended at this time. We understand your concern regarding this Project, and ask that you let us know if you have any difficulty accessing the Draft EIR or if you need additional accommodations to be able review it offline.

Please also be reminded that all comments must be provided in writing, and may be submitted electronically via email, or hard copy via mail. Submittal of comments in person is not required, nor recommended.

Thank you.

On Thu, Apr 30, 2020 at 10:51 AM Susan Hunter <heysuzhunter@gmail.com> wrote:

Mr. Como,

I am still awaiting a response to my email.

Why is the City Planning Department opening review and comment periods on large scale developments while the population is under a Stay-at-Home order? We can't access the DEIR at the library, or any documents at the Planning Department, or documents at City Hall.

So why is the public being barred access to public documents while the developer is allowed to proceed forward on large scale projects?

I am asking that any review periods be suspended while the Stay-at-Home order is in place and for 30 days afterwards. We have to deal with paying rent, being sick, and the loss of loved ones. Does the Planning Department really think this is acceptable to prevent us from looking at documents while asking for input? How is this not being done as a way of showing favoritism to developers over the community?

Please withdraw all review and comment requests on all projects until after the order is lifted.

Susan Hunter

On Thu, Apr 23, 2020 at 11:28 AM Susan Hunter <heysuzhunter@gmail.com> wrote:

Mr. Como,

I am in receipt of this draft EIR notification. However, I am unsure why public notice for a draft EIR is being sent out when we are still under a Stay at Home order due to COVID-19. We can't access the library to review the file. As such, I am asking that with limited public resources, this notice and it's review period be suspended until the lifting of the order. It is incomprehensible that anyone who is having to deal with loss of jobs, loss of family members, or battling this sickness would be expected to have an ability to review this information.

So I am respectfully asking that this, and all project EIR's reviews, be withdrawn until 30 days after the order is lifted.

Susan Hunter

On Thu, Apr 23, 2020 at 9:28 AM Alan Como <alan.como@lacity.org> wrote:

Hello,

You are receiving this email because you are an interested party and/or a mandated recipient of the Notice of Completion and Availability for the [6220 West Yucca Street Project Draft Environmental Impact Report \(EIR\)](#).

This email is to inform you that the City has released the Draft EIR for the 6220 West Yucca Street Project, which is now available for public review on the City's website at the following location: <https://planning.lacity.org/development-services/eir/6220-yucca-project>. In addition, digital copies may be provided via CD-ROM or USB flash drive. Due to current events surrounding COVID-19, the City is taking additional steps to provide the public access to documents. Should you need special accommodations, please contact me directly.

The comment period for the Draft EIR is from April 23, 2020 to June 8, 2020. If you wish to provide comments, please reference the Environmental Case No. above, and submit them in writing by Monday, June 8, 2020, no later than 4:00 p.m.

Written comments may be submitted via:

Mail:

Alan Como, AICP

City of Los Angeles, Department of City Planning

[221 North Figueroa Street, Suite 1350](#)

[Los Angeles, CA 90012](#)

Email: alan.como@lacity.org

Please see the attached Notice for more information. Thank you.



LOS ANGELES
CITY PLANNING

Alan Como, AICP
City Planner
Los Angeles City Planning

221 N. Figueroa St., Room 1350
Los Angeles, CA 90012
Planning4LA.org
T: (213) 847-3633



--



LOS ANGELES
CITY PLANNING

Alan Como, AICP
City Planner
Los Angeles City Planning

221 N. Figueroa St., Room 1350
Los Angeles, CA 90012
Planning4LA.org
T: (213) 847-3633





Alan Como <alan.como@lacity.org>

Notice of Completion and Availability for the 6220 West Yucca Street Project Draft EIR (ENV-2014-4706-EIR)

Susan Hunter <heysuzhunter@gmail.com>

Thu, Apr 30, 2020 at 3:16 PM

To: Alan Como <alan.como@lacity.org>

Cc: Vince Bertoni <vince.bertoni@lacity.org>, Miki Jackson <mikijackson@mac.com>

Hi Alan,

For example, can you please tell me the source of Carbon Credits for the ELDP certification? Is the Credit based on locally supplied sources or internationally supplied? What is the verification process? Is the supplier a third party provider? Is that third party listed on approved contractors for the State? The City?

Thanks,

Susan

1D-1

On Thu, Apr 30, 2020 at 1:40 PM Susan Hunter <heysuzhunter@gmail.com> wrote:

Hi Alan,

I would like to clarify my ask. I am not asking that the comment period be extended. I am saying it need to be halted completely until after the stay at home order is lifted. Then the planning department can open the comment and review period after 30 days after the period is lifted.

Are you saying that the planning department and city hall are open for people to come in and review the file in person? Has the planning department taken into consideration that internet access is a privilege, and is not a publicly provided service? And that many homes in LA do not have internet?

Has the planning department taken into consideration that only the EIR is available online? How do I know what copies of documents in the file I will need without looking at the file first?

The decision made by the planning staff that having only the EIR available online or at the cost of \$5 isn't inclusive of members of the public who don't own a computer or have internet. So how is the city going to provide access for those people?

To be clear, what you are proposing isn't enough to meet public involvement needs. So what is the planning departments plan for those who don't have internet? Are you opening up the planning department to come and look at the rest of the file outside of the EIR? When?

Susan

On Thu, Apr 30, 2020 at 12:24 PM Alan Como <alan.como@lacity.org> wrote:

Susan,

Thank you for your email.

The City has received your request for a time extension to the 6220 West Yucca Draft Environmental Impact Report (Draft EIR) comment period in light of COVID-19.

Per CEQA Guidelines Section 15105, the public review period for a Draft EIR should not be less than 30 days nor should it be longer than 60 days, except under unusual circumstances. While we agree that these are unprecedented times, as indicated in the Notice of Availability and Completion (NOA) for the 6220 West Yucca Draft EIR, the Draft EIR, in its entirety, is available for review on our website at this link: <https://planning.lacity.org/development-services/eir/6220-yucca-project>

If you are having difficulty accessing the document in any way (i.e. if links are not working or if the attachments cannot be viewed) please let us know immediately, as we are committed to making the document as accessible as possible from the safety of your own home, and in compliance with the "Stay at Home" Order. In addition, as also indicated in the NOA, anyone can also request a CD-ROM, flash drive or hard copy of the Draft EIR.

While we understand that the "Stay at Home" Order prevents neighborhood groups from meeting in person, please be advised that CEQA does not require people to meet and confer on the EIR, and should not preclude anyone from reviewing the EIR and providing comments.

Furthermore, pursuant to the Governor's Executive Order N-54-20, signed April 22, 2020, deadlines for filing, noticing, and posting of CEQA documents with county clerk offices have been suspended for 60 days. However, deadlines for public review and comment periods for CEQA documents, such as for draft EIRs, have not been suspended and the provisions governing public review remain unchanged.

As such, please be advised that, as the Draft EIR remains accessible to all individuals, the comment period will not be extended at this time. We understand your concern regarding this Project, and ask that you let us know if you have any difficulty accessing the Draft EIR or if you need additional accommodations to be able review it offline.

Please also be reminded that all comments must be provided in writing, and may be submitted electronically via email, or hard copy via mail. Submittal of comments in person is not required, nor recommended.

Thank you.

On Thu, Apr 30, 2020 at 10:51 AM Susan Hunter <heysuzhunter@gmail.com> wrote:

Mr. Como,

I am still awaiting a response to my email.

Why is the City Planning Department opening review and comment periods on large scale developments while the population is under a Stay-at-Home order? We can't access the DEIR at the library, or any documents at the Planning Department, or documents at City Hall.

So why is the public being barred access to public documents while the developer is allowed to proceed forward on large scale projects?

I am asking that any review periods be suspended while the Stay-at-Home order is in place and for 30 days afterwards. We have to deal with paying rent, being sick, and the loss of loved ones. Does the Planning Department really think this is acceptable to prevent us from looking at documents while asking for input? How is this not being done as a way of showing favoritism to developers over the community?

Please withdraw all review and comment requests on all projects until after the order is lifted.

Susan Hunter

On Thu, Apr 23, 2020 at 11:28 AM Susan Hunter <heysuzhunter@gmail.com> wrote:

Mr. Como,

I am in receipt of this draft EIR notification. However, I am unsure why public notice for a draft EIR is being sent out when we are still under a Stay at Home order due to COVID-19. We can't access the library to review the file. As such, I am asking that with limited public resources, this notice and it's review period be suspended until the lifting of the order. It is incomprehensible that anyone who is having to deal with loss of jobs, loss of family members, or battling this sickness would be expected to have an ability to review this information.

So I am respectfully asking that this, and all project EIR's reviews, be withdrawn until 30 days after the order is lifted.

Susan Hunter

On Thu, Apr 23, 2020 at 9:28 AM Alan Como <alan.como@lacity.org> wrote:

Hello,

You are receiving this email because you are an interested party and/or a mandated recipient of the Notice of Completion and Availability for the 6220 West Yucca Street Project Draft Environmental Impact Report (EIR).

This email is to inform you that the City has released the Draft EIR for the 6220 West Yucca Street Project, which is now available for public review on the City's website at the following location: <https://planning.lacity.org/development-services/eir/6220-yucca-project>. In addition, digital copies may be provided via CD-ROM or USB flash drive. Due to current events surrounding COVID-19, the City is taking additional steps to provide the public access to documents. Should you need special accommodations, please contact me directly.

The comment period for the Draft EIR is from April 23, 2020 to June 8, 2020. If you wish to provide comments, please reference the Environmental Case No. above, and submit them in writing by Monday, June 8, 2020, no later than 4:00 p.m.

Written comments may be submitted via:

Mail:

Alan Como, AICP
City of Los Angeles, Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

Email: alan.como@lacity.org

Please see the attached Notice for more information. Thank you.



LOS ANGELES
CITY PLANNING

Alan Como, AICP
City Planner
Los Angeles City Planning

221 N. Figueroa St., Room 1350
Los Angeles, CA 90012
Planning4LA.org
T: (213) 847-3633



--



LOS ANGELES
CITY PLANNING

Alan Como, AICP
City Planner
Los Angeles City Planning

221 N. Figueroa St., Room 1350
Los Angeles, CA 90012
Planning4LA.org
T: (213) 847-3633





Alan Como <alan.como@lacity.org>

Notice of Completion and Availability for the 6220 West Yucca Street Project Draft EIR (ENV-2014-4706-EIR)

vilija zem <vilijazem@hotmail.com>

Fri, Apr 24, 2020 at 12:39 PM

To: Alan Como <alan.como@lacity.org>

Cc: Mama ir Tete Zemaitaitis <ramunemarie@gmail.com>, "viliazem@gmail.com" <viliazem@gmail.com>

Hello, and thank you for your email.

We will review the documents and respond by the deadline.

By the way, what happened to the previous case planner, William Lamborn?

Best regards,

Vilia Zemaitaitis, AICP
Romas and Marie Zemaitaitis
1763 Vista Del Mar (next door to the Yucca Project)

2-1

From: Alan Como <alan.como@lacity.org>

Sent: Thursday, April 23, 2020 9:28 AM

Subject: Notice of Completion and Availability for the 6220 West Yucca Street Project Draft EIR (ENV-2014-4706-EIR)

Hello,

You are receiving this email because you are an interested party and/or a mandated recipient of the Notice of Completion and Availability for the 6220 West Yucca Street Project Draft Environmental Impact Report (EIR).

This email is to inform you that the City has released the Draft EIR for the 6220 West Yucca Street Project, which is now available for public review on the City's website at the following location: <https://planning.lacity.org/development-services/eir/6220-yucca-project>. In addition, digital copies may be provided via CD-ROM or USB flash drive. Due to current events surrounding COVID-19, the City is taking additional steps to provide the public access to documents. Should you need special accommodations, please contact me directly.

The comment period for the Draft EIR is from April 23, 2020 to June 8, 2020. If you wish to provide comments, please reference the Environmental Case No. above, and submit them in writing by Monday, June 8, 2020, no later than 4:00 p.m.

Written comments may be submitted via:

Mail:
Alan Como, AICP
City of Los Angeles, Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

Email: alan.como@lacity.org

Please see the attached Notice for more information. Thank you.

Alan Como, AICP
City Planner

Los Angeles City Planning

4/27/2020



221 N. Figueroa St., Room 1350
Los Angeles, CA 90012
Planning4LA.org
T: (213) 847-3633





Alan Como <alan.como@lacity.org>

Notice of Completion and Availability for the 6220 West Yucca Street Project Draft EIR (ENV-2014-4706-EIR)

vilija zem <vilijazem@hotmail.com> Mon, Jun 8, 2020 at 2:10 PM
To: Alan Como <alan.como@lacity.org>
Cc: Mama ir Tete Zemaitaitis <ramunemarie@gmail.com>, "viliazem@gmail.com" <viliazem@gmail.com>

Please see the attached Draft EIR comments and acknowledge receipt of the email.

2B-1

Thank you.

From: vilija zem <vilijazem@hotmail.com>
Sent: Friday, April 24, 2020 12:39 PM
To: Alan Como <alan.como@lacity.org>
Cc: Mama ir Tete Zemaitaitis <ramunemarie@gmail.com>; viliazem@gmail.com <viliazem@gmail.com>
Subject: Re: Notice of Completion and Availability for the 6220 West Yucca Street Project Draft EIR (ENV-2014-4706-EIR)

[Quoted text hidden]

 **Draft EIR Comments re ENV-2014-4706-EIRfor 6220 W Yucca Project from Zemaitaitis 1763-1761 Vista Del Mar.pdf**
277K

Vilia Zemaitaitis on behalf of
Romas and Marija Zemaitaitis
2227 Meadow Valley Terrace
Los Angeles, CA 90039

June 7, 2020

Mr. Alan Como, AICP
City of Los Angeles, Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

Subject: **6220 West Yucca Street Project Draft EIR (ENV-2014-4706-EIR)**
Draft EIR Comments and Letter of Opposition to Current Proposal

Dear Mr. Como,

Thank you for the opportunity to comment on the Draft EIR for the above project.

My parents are the longtime property owners of the 1-1/2 story duplex at 1761-1763 Vista del Mar directly adjacent to Building 1's proposed parking structure at the rear and all of Building 2 to the north on Vista Del Mar. As such, we oppose the current proposal and rezoning application, and are greatly concerned with the impacts from the proposed 20-story, 250-foot tower on Yucca, and the 34 to 47-foot tall building proposed on the least parcels fronting Vista Del Mar to be rezoned and developed as part of the project.

2B-2

Excerpts from the Draft EIR identifying our property are included on the page 3 of this letter.

2B-3

Below are comments on the Draft EIR:

Noise Vibration

Page IV.I-7 of the Draft EIR defines sensitive receptors for groundborne vibrations as including "buildings where vibration would interfere with operations within the building or cause structural damage (especially older masonry structures), locations where people sleep..." The building directly adjacent to the project site contains at 1761-1763 Vista Del Mar Ave. is an older structure constructed in 1922 and used for rental housing qualifying it as a sensitive receptor for both vibration as well as noise impacts. This residence is specifically called out on page IV.I-51 of the EIR as significantly impacted by vibration impacts due to its proximity from the project site as within five feet. The EIR also recognizes vibration impacts to residents as significant (see page IV.I-53). Due to the age of the residence, nearly 100 years old, it is possible that significant damage may occur that can not "be repaired to the same or better physical condition as documented in the pre-construction inspection and video and/or photographic records" as required by MM-NOI-4; however, the mitigation measure does not indicate what would happen in the case of disrepair and therefore, does not adequately reduce potential impacts to less than significant.

2B-4

MM-NOI-3 requires that "Heavy construction equipment such as a large dozer, a large grader, and a large excavator shall not operate within 15 feet from the nearest single-family residential building adjacent to the Project Site along Vista Del Mar Avenue". Not sure how this is possible considering that the project is only setback six feet from the property line adjacent to 1761-1763 Vista Del Mar Avenue. This is especially true due to the need to set piles for shoring the underground parking structure that would certainly require heavy equipment to install, and where some pile driving may be necessary.

2B-4

Shade Shadow

According to the exemption provisions for SB743 eligible projects, the exemption for aesthetic impacts does not include impacts to historic or cultural resources. Since a portion of the project is located in the Vista del Mar-Carlos Historic District, which 1761-1763 is a contributor to the district as identified on Figure IV.C-1, aesthetic impacts cannot be exempted from CEQA analysis as stated on page IV.A-14.

2B-5

Cultural Resources

Section IV.C of the EIR does not discuss impacts due to vibration that are clearly identified in the Noise Section. Specifically, the EIR identifies less than significant impacts to the residence at 1761-1763 with mitigation due to vibration. However, MM-NOI-4 does not indicate what would happen in the case of disrepair resulting from vibration impacts. Should this district contributor be lost, or any other contributor, would the district still be intact? This should be discussed in the Draft EIR as a potential impact.

2B-6

Land Use

Rezoning the properties along Vista Del Mar Avenue would result in impacts to the residence along this street, especially 1761-1763, which is directly adjacent. Impacts associated with noise and vibration, aesthetic, cultural resources etc. would be much less if the properties were not rezoned from R3-1XL. Furthermore, by rezoning the properties along Vista Del Mar, is the project still able to take advantage of being classified as transit oriented under SB743? These properties would not qualify on their own absent the properties fronting Yucca Street.

2B-7

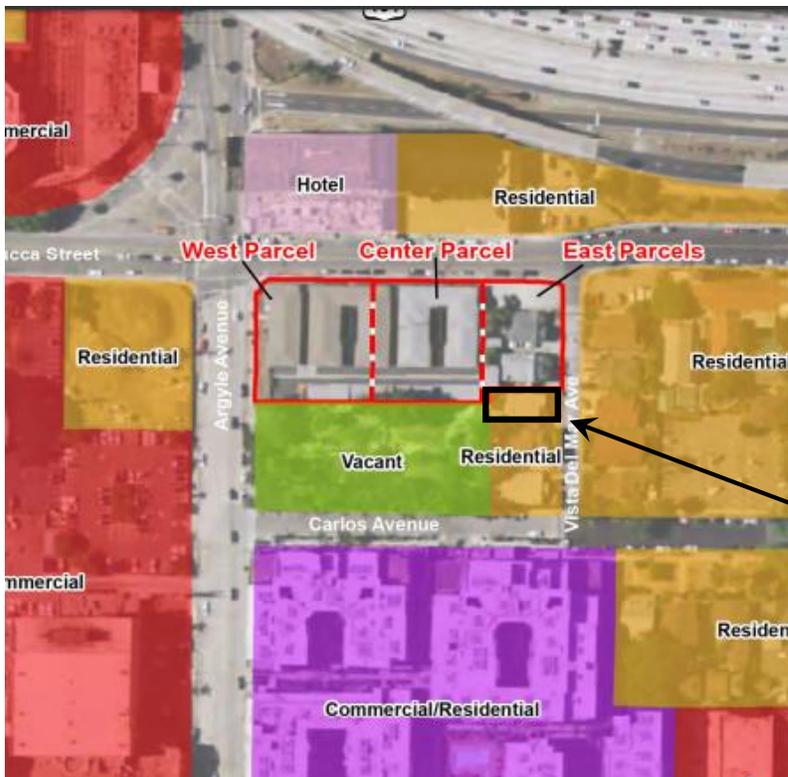
Should you have any questions, please contact me, Vilia Zemaitaitis, at viliazem@gmail.com, and copy ramunmarie@gmail.com.

2B-8

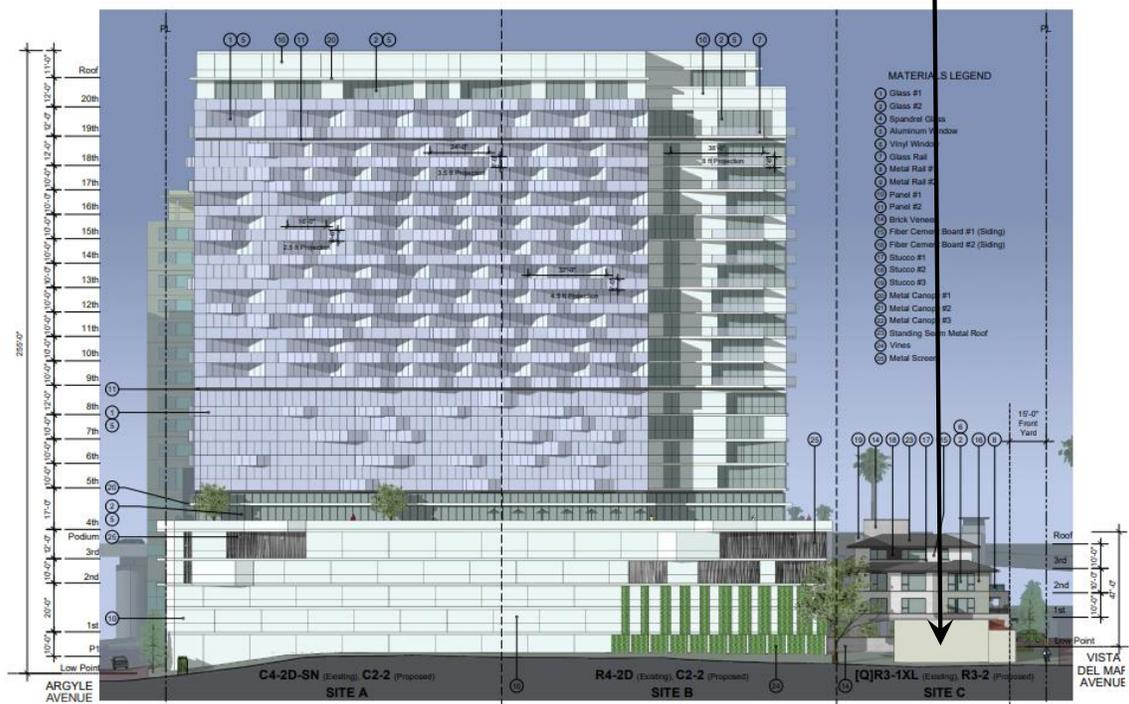
Thank you for considering our concerns and comments.

Vilia Zemaitaitis

On behalf of Romas and Marija (Marie) Zemaitaitis



Our property at
1761-1763 Vista Del Mar



SOURCE: Toogawa Smith Martin, Inc., 2015

6220 West Yucca Project



Alan Como <alan.como@lacity.org>

Extension on Deadline for Comments on 6220 West Yucca Street Project Draft EIR (ENV-2014-4706-EIR)

ShaunaJohnson@mail.com <ShaunaJohnson@mail.com>

Wed, Jun 3, 2020 at 3:32 PM

To: Alan Como <alan.como@lacity.org>

Hi Mr. Como -

I'm writing ask if the June 8, 2020 deadline will be extended for comments on the 6220 West Yucca Street Project Draft EIR (ENV-2014-4706-EIR) as the Planning Meeting for June 9, 2020 has been cancelled? If so, what is the new deadline.

3-1

I appreciate your help with this.

Shauna Johnson
323-333-5733

Sent: Thursday, April 23, 2020 at 9:28 AM
From: "Alan Como" <alan.como@lacity.org>
To: undisclosed-recipients;
Subject: Notice of Completion and Availability for the 6220 West Yucca Street Project Draft EIR (ENV-2014-4706-EIR)

Hello,

You are receiving this email because you are an interested party and/or a mandated recipient of the Notice of Completion and Availability for the [6220 West Yucca Street](#) Project Draft Environmental Impact Report (EIR).

This email is to inform you that the City has released the Draft EIR for the 6220 West Yucca Street Project, which is now available for public review on the City's website at the following location: <https://planning.lacity.org/development-services/eir/6220-yucca-project>. In addition, digital copies may be provided via CD-ROM or USB flash drive. Due to current events surrounding COVID-19, the City is taking additional steps to provide the public access to documents. Should you need special accommodations, please contact me directly.

The comment period for the Draft EIR is from April 23, 2020 to June 8, 2020. If you wish to provide comments, please reference the Environmental Case No. above, and submit them in writing by Monday, June 8, 2020, no later than 4:00 p.m.

Written comments may be submitted via:

Mail:

Alan Como, AICP
 City of Los Angeles, Department of City Planning
 221 North Figueroa Street, Suite 1350
 Los Angeles, CA 90012

Email: alan.como@lacity.org

Please see the attached Notice for more information. Thank you.

LOS ANGELES
CITY PLANNING

Alan Como, AICP
 City Planner
 Los Angeles City Planning

221 N. Figueroa St., Room 1350
 Los Angeles, CA 90012
 Planning4LA.org
 T: (213) 847-3633



6/3/2020

City of Los Angeles Mail - Extension on Deadline for Comments on 6220 West Yucca Street Project Draft EIR (ENV-2014-4706-EIR)

LETTER NUMBER IND 3

6/8/2020

LETTER NUMBER IND 4
City of Los Angeles Mail - Re: 6220 Yucca Project



Alan Como <alan.como@lacity.org>

Re: 6220 Yucca Project

Bob Mori <bobmori@mac.com>
To: alan.como@lacity.org

Fri, Jun 5, 2020 at 4:44 PM

 **200525 HWD Ltr v2_RSM.pdf**
45K

June 5, 2020

Alan Como, AICP
City of Los Angeles, Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012
Submitted electronically at alan.como@lacity.org

RE: Environmental Case No: ENV-2014-4706-EIR
Comments on Draft Environmental Impact Report (DEIR) for the Hollywood Community Plan
Update 2 (HCPU2) No. CPC-2016-1450-CPU

Dear Mr. Como,

I am writing as a resident of Hollywood regarding the Draft Environment Impact Report on the proposed development for 6220 West Yucca Street Project (ENV-2014-4706-EIR).

I insist that the Department of City Planning immediately withdraw the Draft EIR project review until 30 days after the City's Stay at Home order is lifted.

As has been shown by the COVID-19 crisis, Hollywood has plenty of luxury housing sitting empty. We need to stop creating more luxury housing at the expense of displacing our community members.

Finally, it is outrageous that the Department of City Planning expects the community to contribute public comment during the COVID-19 crisis. I join with many other community members in demanding that this notice and the review period be withdrawn until 30 days after the governor and mayor lift the Stay at Home order and that the DEIR be redrafted to address the above issues.

Regards,



Robert Mori

419 South Cloverdale Avenue
Los Angeles, California 90036

4-1

