

Appendices

Appendix FEIR-1

Draft EIR Comment Letters



Jason McCrea <jason.mccrea@lacity.org>

SCH# 2017051079

1 message

Christine Asiata <Christine.Asiata@opr.ca.gov>
To: "Jason.mccrea@lacity.org" <Jason.mccrea@lacity.org>

Tue, Apr 14, 2020 at 5:19 PM

The State Clearinghouse would like to inform you that our office will be transitioning from providing a hard copy of acknowledging the close of review period on your project to electronic mail system.

Please visit: <https://ceqanet.opr.ca.gov/2017051079/3> for full details about your project and if any state agencies submitted comments by close of review period (note: any state agencies in **bold**, submitted comments and are available).

This email acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please email the State Clearinghouse at state.clearinghouse@opr.ca.gov for any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Christine Asiata Rodriguez



Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro™

April 13, 2020

Jason McCrea
Department of City Planning
City of Los Angeles
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
Sent by Email: Jason.mccrea@lacity.org

RE: Hollywood & Wilcox Project – ENV-2016-3177-EIR
6430-6440 W. Hollywood Blvd.
Draft Environmental Impact Report (DEIR) – Metro Comments

Dear Mr. McCrea:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Hollywood & Wilcox (Project) located at 6430-6440 West Hollywood Boulevard and 1624-1648 North Wilcox 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 specific detail on the scope and content of environmental information that should be included in the Environmental Impact Report (EIR) for the Project. In particular, this letter outlines topics regarding the Project's potential impacts on the Metro B Line (Red) and Metro bus facilities and services which should be analyzed in the EIR, and provides recommendations for mitigation measures and project design features as appropriate. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.¹

In addition to the specific comments outlined below, Metro is providing the City and 6436 Hollywood Blvd., LLC and 1624 Wilcox Ave., LP (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/.

¹ See CEQA Guidelines section 15064.3(a); Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts In CEQA, December 2018, p. 19.

Project Description

The Project includes the development of a 15-story mixed-use building, comprised of 260 multi-family residential units and 17,800 square-feet of commercial uses.

Recommendations for EIR Scope and Content

Bus Service Adjacency

1. Service: Metro Bus Lines 212, 217, 232, and 780 operate on Hollywood Boulevard, adjacent to the Project. One Metro Bus stop(s) is across the street from the Project site at Hollywood and Cahuenga. Other transit operators, such as LADOT, may provide service in the vicinity of the Project and should be consulted.
2. Impact Analysis: The EIR should analyze potential effects on Metro Bus service and identify mitigation measures or project design features as appropriate. Potential impacts may include impacts to transportation services and temporary or permanent bus service rerouting. Specific types of impacts and recommended mitigation measures to address them include, without limitation, the following:
 - a. Bus Stop Condition: The EIR should identify all bus stops on all streets adjacent to the Project site. During construction, the Applicant may either maintain the stop in its current condition and location, or temporarily relocate the stop consistent with the needs of Metro Bus operations. Temporary or permanent modifications to any bus stop as part of the Project, including any surrounding sidewalk area, must be Americans with Disabilities Act (ADA)-compliant and allow passengers with disabilities a clear path of travel between the bus stop and the Project. Once the Project is completed, the Applicant must ensure any existing Metro bus stop affected by the Project is returned to its pre-Project location and condition, unless otherwise directed by Metro.
 - b. Bus Operations Coordination: The Applicant shall coordinate with Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 not later than 30 days before the start of Project construction. Other municipal bus services may also be impacted and shall be included in construction outreach efforts.

Subway Adjacency

1. Operations: The Metro B Line (Red) currently operates peak service as often as every ten minutes in both directions. Trains may operate 24 hours a day, seven days a week in the tunnels below the Project.
2. Impact Analysis: Due to the Project's proximity to the B Line (Red) tunnels, the EIR must analyze potential effects on subway operations and identify mitigation measures or project design features as appropriate. Critical impacts that should be studied include (without limitation): impacts of Project construction and operation on the structural and systems integrity of subway tunnels; damage to subway infrastructure, disruption to subway service; and noise and vibration. The following provisions should be used to develop a mitigation measure and/or project design feature that addresses these potential impacts:
 - a. Technical Review: The Applicant shall submit for Metro's review all architectural plans, engineering drawings and calculations, and construction work plans and methods,

including any crane placement and radius, to evaluate any impacts to Metro B Line (Red) infrastructure in relationship to the Project. Before issuance of any building permit for the Project, the Applicant shall obtain Metro's approval of final construction plans.

- b. Construction Safety: The construction and operation of the Project shall not disrupt the operation and maintenance activities of the Metro B Line (Red) or the structural and systems integrity of Metro's tunnels. Not later than one month before Project construction, the Applicant shall contact Metro to schedule a pre-construction meeting with all Project construction personnel and Metro Real Estate, Construction Management, and Construction Safety staff. During Project construction, the Applicant shall:
 - i. Work in close coordination with Metro to ensure that station access, visibility, and structural integrity are not compromised by construction activity or permanent build conditions;
 - ii. Notify Metro of any changes to construction activity that may impact the use of the ROW;
 - iii. Permit Metro staff to monitor construction activities to ascertain any impact to the B Line (Red) ROW.
 - c. Right of Way (ROW) Entry Permit: For temporary or ongoing access to Metro ROW for any construction, and/or maintenance activities, the Applicant shall complete Metro's Track Allocation process with Metro Rail Operations and obtain a Right of Entry Permit from Metro Real Estate. Approval for single tracking or a power shutdown, while possible, is highly discouraged; if sought, the Applicant shall apply for and obtain such approval not later than two months before the start of Project construction. The Applicant shall apply for and obtain approval for any special operations, including the use of a pile driver or any other equipment that could come in close proximity or encroach on the tunnels or related structures, not later than one month before the start of Project construction.
 - d. Noise & Vibration: The Applicant shall record a Noise Easement Deed in favor of Metro before issuance of any Certificate of Occupancy for the Project. The easement recorded in the Deed shall extend to successors and tenants. The applicant shall provide the original recorded Noise Easement Deed to Metro.
3. Advisories to Applicant: The Applicant is encouraged to contact the Metro Development Review Team early in the design process to address potential impacts. The Applicant should also be advised of the following:
- a. Occupational Safety and Health Administration (OSHA) Requirements: Construction and/or excavation work in proximity to Metro right-of-way (ROW) with potential to damage subway tracks and related infrastructure may be subject to additional OSHA safety requirements.
 - b. Technical Review: Metro charges for staff time spent on engineering review and construction monitoring.

- c. Cost of Impacts: The Applicant will be responsible for costs incurred by Metro resulting from Project construction/operation issues that cause delay or harm to Metro service delivery or infrastructure, including single-tracking or bus bridging around closures. The Applicant will also bear all costs for any noise mitigation required for the Project.

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:

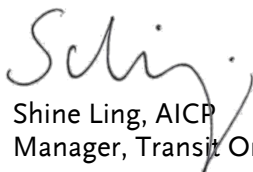
1. Transit Supportive Planning Toolkit: Metro strongly recommends that the Applicant review the Transit Supportive Planning Toolkit which identifies 10 elements of transit-supportive places and, applied collectively, has been shown to reduce vehicle miles traveled by establishing community-scaled density, 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>.
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. 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 bus stops and rail 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.

- 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.
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.
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/>.

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

Sincerely,



Shine Ling, AICP
Manager, Transit Oriented Communities

Attachments and links:

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

DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-0475
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life.*

April 7, 2020

Jason McCrea
City of Los Angeles Department of City Planning
221 N. Figueroa Street
Los Angeles, CA 90012

RE: Hollywood & Wilcox – Draft Environmental
Impact Report (DEIR)
SCH # 2017051079
GTS # 07-LA-2017-03173
Vic. LA-101/PM: 7.588

Dear Jason McCrea:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced DEIR. The proposed project is an infill, mixed-use development comprised of 260 multi-family dwelling units and approximately 17,800 square feet (SF) of commercial uses on a 1.4-acre project site within the City of Los Angeles. Up to 10% of the dwelling units would be set aside for workforce housing. Upon completion, the Project would include approximately 278,892 SF of floor area, inclusive of the 9,000-SF existing Attie Building, with a maximum floor area ratio (FAR) of up to 4.5:1. Approximately 420 parking spaces would be provided, which accounts for a 10% reduction, pursuant to the Los Angeles Bicycle Parking Ordinance. The Project is an Environmental Leadership Development Project under Assembly Bill 900, certified by the Governor on October 10, 2019. The City of Los Angeles is considered the Lead Agency under the California Environmental Quality Act (CEQA).

The nearest State facilities to the proposed project are the United States 101 (US-101) and State Route 2 (SR-2), which is also known as Santa Monica Boulevard. The US-101 at Cahuenga Boulevard is located approximately 2,200 feet away from the project, and the SR-2 at Wilcox Avenue is located approximately 4,000 feet away from the project.

Regarding transit access, the project is located approximately .25 miles away from the Metro Red Line Hollywood/Vine station, and approximately 2,500 feet away from the Metro Red Line Hollywood/Highland Station. This means that the project is located in a Transit Priority Area (TPA) per the Technical Advisory on Evaluating Transportation Impacts in CEQA by the California Governor's Office of Planning and Research (OPR), dated December 2018. There are also several bus lines with stops along Hollywood Boulevard near the project site. Specifically, there are eight Metro local lines, 3 DASH lines, and one LADOT Commuter Express line that have stops near the project site.

In terms of active transportation facilities serving the project, there are sidewalks along Hollywood Boulevard and Wilcox Avenue. The project also involves implementing streetscape amenities, such as a row of street trees on Wilcox Avenue, pedestrian-scale lighting, and landscaped outdoor seating areas. As discussed in the DEIR, while there are no dedicated bicycle facilities in the immediate vicinity of the project site, there are a limited number of Class II and Class III bicycle facilities in the study area. Also, the project will offer 304 bicycle parking spaces.

Caltrans initially commented on the Notice of Preparation for this project in June 2017. Since then, the City of Los Angeles has adopted a Vehicle Miles Traveled (VMT) metric for transportation analysis, in accordance with Senate Bill 743 (2013). This bill mandates that VMT be used as the primary metric in identifying transportation impacts of all future development projects under CEQA, starting July 1, 2020. In light of the City's early adoption of VMT, Caltrans has reviewed this project based on the 2018 OPR Technical Advisory on Evaluating Transportation Impacts in CEQA. According to these guidelines, this project is presumed to have a less than significant impact because it is located in a TPA, and meets the following criteria:

- Has a floor area ratio of more than 0.75
- Does not include more parking than required by the local permitting agency
- Is consistent with the region's Sustainable Communities Strategy
- Does not replace affordable residential units with a smaller number of moderate- or high-income residential units

In addition, Caltrans does not have any safety concerns with this project. However, if any of the following proposed transportation-related Project Design Features will be implemented in or near Caltrans right-of-way, please inform Caltrans for its review and approval.

- **TR-PDF-1:** Preparation of a Construction Traffic Management Plan
- **TR-PDF-2:** Implementation of a Transportation Demand Management Program
- **TR-PDF-3:** Contribution toward Transportation Systems Management Improvements

The following information is included for your consideration.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Furthermore, Caltrans encourages the Lead Agency to integrate transportation and land use in a way that reduces Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions, as well as facilitates a high level of non-motorized travel and transit use. Thus, Caltrans supports the Transportation Demand Management (TDM) strategies this project has incorporated, such as preparing a TDM program, providing pedestrian lighting, and widening a portion of Wilcox Avenue by five feet. Additional TDM strategies that the City of Los Angeles can consider integrating into this project include:

- Provide transit passes to residents and employees to encourage them to utilize nearby transit services.
- In addition to providing parking incentives, all parking should be priced appropriately, and unbundled from residential leasing agreements.
- Provide showers, lockers, and an on-site bike repair room to residents and employees, to support a mobility hub and decrease barriers to cycling.
- Improve bus stops adjacent to the site, such as by providing a bench at the bus stop on the southwest corner of Hollywood Boulevard and Wilcox Avenue.
- Enhance bicycle facilities on Wilcox Avenue and Selma Avenue to create safer and more comfortable environments for people on bikes.
- Ensure that the portion of sidewalk that will be widened on Wilcox Avenue meets ADA requirements after it is widened.

Please make every attempt to reduce VMT.

As a reminder, any transportation of heavy construction equipment or materials that requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. If construction traffic is expected to cause delays on any State facilities, including the US-101, please submit the Construction Traffic Management Plan detailing these delays for Caltrans' review. Caltrans supports the measure in this plan to require construction-related traffic, including truck haul trips, to be scheduled outside of commuter peak hours to the extent possible.

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at Emily.Gibson@dot.ca.gov, and refer to GTS# 07-LA-2017-03173.

Sincerely,

A handwritten signature in black ink that reads "Miya Edmonson". The script is cursive and fluid.

MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

RECEIVED
CITY OF LOS ANGELES

MAR 31 2020

MAJOR PROJECTS
UNIT

DATE: March 6, 2020

TO: Vincent P. Bertoni, Director of Planning
Department of City Planning

Attn: Jason McCrea, City Planner
Department of City Planning

FROM: Ali Poosti, Division Manager
Wastewater Engineering Services Division
LA Sanitation and Environment



**SUBJECT: HOLLYWOOD & WILCOX - NOTICE OF COMPLETION AND
AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT**

This is in response to your February 27, 2020 Notice of Completion and Availability of Draft Environmental Impact Report for the proposed mixed-use project located at 6430-6440 W Hollywood Blvd and N 1624-1648 N Wilcox Ave, Los Angeles, CA 90028. LA Sanitation, Wastewater Engineering Services Division has received and logged the notification. Upon review it has been determined that there were no changes to the project and thus, the previous response that was sent on July 5, 2017 is still valid. Please notify our office in the instance that additional environmental review is necessary for this project.

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

CD/AP:sa

c: Kosta Kaporis, LASAN
Cyrous Gilani, LASAN
Christopher DeMonbrun, LASAN

Los Angeles Unified School District

Office of Environmental Health and Safety

AUSTIN BEUTNER
Superintendent of Schools

VIVIAN EKCHIAN
Deputy Superintendent

CARLOS A. TORRES
Director, Environmental Health and Safety

March 23, 2020

Jason McCrea
City of Los Angeles, Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA, 90012

SUBJECT: PROJECT NAME: Hollywood & Wilcox
PROJECT LOCATION: 6436 Hollywood Blvd.
CEQA CASE NUMBER: ENV-2016-3177-EIR

Presented below are comments submitted on behalf of the Los Angeles Unified School District (LAUSD) regarding the project located at 6436 Hollywood Boulevard.

Based on the extent/location of the proposed development, it is our opinion that significant environmental impacts on the surrounding community (traffic, pedestrian safety) will occur. Due to the fact that Selma Elementary School is located approximately 700 ft. from the proposed project site, LAUSD is concerned about the potential negative impacts of the development to our students, staff and parents traveling to and from the referenced campuses. Since the project will have a significant impact on LAUSD schools, mitigation measures designed to help reduce or eliminate such impacts are included in this response.

Traffic/Transportation

LAUSD's Transportation Branch **must be contacted** at (213) 580-2950 regarding the potential impact upon existing school bus routes. The Project Manager or designee will have to notify the LAUSD Transportation Branch of the expected start and ending dates for various portions of the project that may affect traffic within nearby school areas. To ensure that effective mitigations are employed to reduce construction and operation related transportation impacts on District sites, we ask that the following language be included in the mitigation measures for traffic impacts:

- During the construction phase, truck traffic and construction vehicles may not cause traffic delays for our transported students.
- During and after construction changed traffic patterns, lane adjustment, traffic light patterns, and altered bus stops may not affect school buses' on-time performance and passenger safety.
- Construction trucks and other vehicles are required to stop when encountering school buses using red-flashing-lights must-stop-indicators per the California Vehicle Code.
- Contractors must install and maintain appropriate traffic controls (signs and signals) to ensure vehicular safety.

333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017 • Telephone (213) 241-3199 • Fax (213) 241-6816

Our Mission: To ensure a safe and healthy environment for students to learn, teachers to teach, and employees to work.
Our Vision: To eliminate all environmental, health, and safety risks at schools.

- Contractors must maintain ongoing communication with LAUSD school administrators, providing sufficient notice to forewarn children and parents when existing vehicle routes to school may be impacted.

Pedestrian Safety

Construction activities that include street closures, the presence of heavy equipment and increased truck trips to haul materials on and off the project site can lead to safety hazards for people walking in the vicinity of the construction site. To ensure that effective mitigations are employed to reduce construction and operation related pedestrian safety impacts on District sites, we ask that the following language be included in the mitigation measures for pedestrian safety impacts:

- Contractors must maintain ongoing communication with LAUSD school administrators, providing sufficient notice to forewarn children and parents when existing pedestrian routes to school may be impacted.
- Contractors must maintain safe and convenient pedestrian routes to all nearby schools. The District will provide School Pedestrian Route Maps upon your request.
- Contractors must install and maintain appropriate traffic controls (signs and signals) to ensure pedestrian and vehicular safety.
- Haul routes are not to pass by any school, except when school is not in session.
- No staging or parking of construction-related vehicles, including worker-transport vehicles, will occur on or adjacent to a school property.
- Funding for crossing guards at the contractor's expense is required when safety of children may be compromised by construction-related activities at impacted school crossings.
- Barriers and/or fencing must be installed to secure construction equipment and to minimize trespassing, vandalism, short-cut attractions, and attractive nuisances.
- Contractor's are required to provide security patrols (at their expense) to minimize trespassing, vandalism, and short-cut attractions.

The District's charge is to protect the health and safety of students and staff, and the integrity of the learning environment. The comments presented above identify potential environmental impacts related to the proposed project that must be addressed to ensure the welfare of the students attending Selma Elementary School their teachers and the staff, as well as to assuage the concerns of the parents of these students. Therefore, the measures set forth in these comments should be adopted as conditions of project approval to offset unmitigated impacts on the affected school students and staff.

Thank you for your attention to this matter. If you need additional information please contact me at (213) 241-4210.

Regards,

Alex Campbell
Assistant CEQA Project Manager



HOLLYWOOD HERITAGE, INC.

P.O. Box 2586

Hollywood, CA 90078

(323) 874-4005 • FAX (323) 465-5993

Major Projects Section
Department of City Planning
221 N. Figueroa Suite 1350
Los Angeles, CA 90012
(213) 847-3672
Jason.mccrea@lacity.org

April 13, 2020

Re: "Hollywood and Wilcox"

City Case No. ENV-2016-3177 -EIR

Addresses: 6430 -6440 Hollywood Boulevard and 1624-1648 N. Wilcox Ave

Dear Mr. McCrea:

Hollywood Heritage has a keen interest in the preservation of our City's important architectural history and is responding to your Draft EIR with detailed comments. Our central concern is with the long-term preservation of Hollywood Boulevard's National Register Commercial and Entertainment Historic District, and the 4 specific effects the proposed project has on it:

1. **Attie Building restoration** (6436-40 Hollywood Bl. and 1646-48 Wilcox): While the DEIR provides a well-researched historical background, the resulting design proposal for the storefronts is insufficiently researched and inappropriate, but correctable.
Specific actions to ensure appropriate follow-through must be added to the project Conditions. See Attachment #1
2. **National Register District building demolition/new building** (6430- 6434 Hollywood) (a non-contributor) without the requisite Historic Assessment. The DEIR conclusions that non-contributors by definition have no significance comes from a misunderstanding of District composition. Replacement by a new building which does not comply with the Secretary of the Interior Standards, Preservation Brief #14, or the

Hollywood Boulevard Urban Design Plan and other guidelines, is a significant adverse effect unless corrected.

Correction of the design is necessary to avoid significant adverse effect; specific actions to ensure appropriate follow-through must be added to the project Conditions. See Attachment #2

3. **Incompatible new project construction:** with significant adverse effects within the area of the Hollywood Boulevard Urban Design District and adjacent to the National Register District --which does not conform with design requirements or with zoning.

- a. **Incompatible and Oversize:** The project at over twice the allowed size looms over the National Register Historic District, with incompatible materials, 3 levels of above grade parking, with incompatible height--having adverse effects on that District. The proposed density exceeds that allowed anywhere in the Community Plan; does not meet Redevelopment Plan requirements for excess density; does not “pass the test” required in removing current zoning “D” conditions.

The project design must be corrected to avoid significant adverse effect. See Attachment #3

- b. **Direct effect on Mark Twain Hotel:** The insensitive design of the proposed above- grade parking and the demolition of the current buildings north of 1622 Wilcox can physically and economically affect the Mark Twain Hotel, identified in 2019 and shown as historically significant in the 2020 Historic Resources Survey on -line in the City Planning Department’s website.

FEIR must recognize Mark Twain Hotel as an historically significant structure and eliminate adverse impacts. See Attachment #3

4. **Avoiding genuine affordable housing:** By asking for allowance to build 2.5 x the floor area permitted by right and offering 10% “workforce housing”, the developer evades the normal, monitorable requirements for “affordable” housing when using incentives in SB 1818, TOC, or SB 330 or other laws. Hollywood has a glut of luxury housing resulting from a mountain of similar past discretionary actions. Hollywood Heritage customarily avoids raising such issues, but the data has piled up so it can’t be ignored. A false “conflict” of preservation with affordable housing is leveled against preservation. But it is the outsized project that puts Hollywood Heritage on the defensive, when yet again no affordable housing results from the give-away of units. The problems and conflicts are being created for preservation. A code-compliant project would not have these problems.

FEIR must clarify specific income level served by “workforce housing”—approximately \$90,000 per year or \$2,250/month rent—and what agency will be charged with monitoring performance by the developer.

See Attachment #4

Positive design approaches: Hollywood Heritage recognizes the attempt to ameliorate the project’s impact:

- Recounting of the Attie Building’s history and significance with a genuine effort to guide restoration in a Standards-compliant way (reflected on page IV.B-34), is well done. There are detailed issues and a need for a commitment to the timing.
- Keeping the proposed new building within the National Register District to the allowed height of 45’ in accordance with the Sec 7.3.A.1 of Hollywood Boulevard Urban Design Plan is good. Again there are detailed issues which can optimize the solution.
- Designing a new residential building to partially mitigate its overheight effect, by stepping back the bulk in accordance with Sec 7.4.B.2 of the Hollywood Boulevard Urban Design Plan is good. But the overall result still has a long way to go.

Significant omissions from DEIR: Hollywood Heritage is highly concerned that this DEIR is analyzing and illustrating a specific project, but not honestly and forthrightly revealing critical information:

- Must enforce Environmental Leadership, not let it drop: The project was granted State incentives based on a promise to achieve the LEED Gold building rating, prevailing wages, a 15% improvement in transportation efficiency, etc. The developer gained relief in Sacto from environmental law challenges on November 8, 2019. BUT the DEIR on page 16 erroneously says the project “*would apply* for LEED Gold certification”. The “sustainability features” touted in the DEIR are simply the existing mandatory minimums under State building codes. They cannot be presented as any example of compliance or earning the “Leadership” benefits. The Project Description cites that a binding written agreement must already exist implementing the Leadership mandates. The omission for the DEIR is conspicuous, and all the conditions must be included in the FEIR.

LEED Gold is a requirement of the Project and the other “leadership” promises must become requirements of the project.

- Must recognize and follow Hollywood Boulevard Urban Design Plan: On November 11, 2019 the Hollywood Redevelopment Plan land use responsibilities transferred to the City of Los Angeles. On November 7, at a hearing to approve the long-delayed Hollywood Boulevard Urban Design Plan in time for that transfer, Project representatives lobbied successfully to stop the Community Redevelopment Agency from approving the important plan. This Urban Design Plan was a 3rd updated version prepared by CRA to clarify the design standards and review process for the area surrounding and on Hollywood Boulevard—a requirement written into the Redevelopment Plan in 1986. For over 30 years “All new development in the District shall meet the design guidelines to ensure that the objectives of the District are achieved.” Whether or not the guidelines were ever formally adopted by CRA, they reviewed projects. The City as successor agency is required to review as well.

FEIR must include a comprehensive written review of proposed new construction in accordance with the Urban Design Plan—adopted or not. One option is to incorporate into Site Plan Review. The FEIR may choose to use the 1993 version- as CRA had agreed to before the transfer– or review according to all versions.

- Must acknowledge the City's Conservation Element: An unacceptable omission from the DEIR Land Use section is that fact that the City of Los Angeles General Plan Conservation Element broadly recognizes preservation of historic buildings as a General Plan priority. The DEIR implies the Element is limited to landscape and open space features, and thus, as implied on page IV.F-23-24 has no conflict with the “applicable goals, objectives, and policies set forth in the Conservation Element”. For CEQA, the Conservation Element casts a broad net for eligibility, including buildings identified by the Community Redevelopment Agency, etc.

The omission must be corrected overtly in the FEIR

- Must show all the CRA-related land use entitlement processes, created as “Multiple Approvals Procedural Revisions Ordinance” No. 182,106 (Multiple Approvals Ordinance) which amends Chapter 1 of the Los Angeles Municipal Code (the “Code”). The DEIR fails to address conformance with the Redevelopment Plan—falling back of “goals and objectives” of redevelopment rather than the actual plan contents of the Plan.

The omission must be corrected overtly in the FEIR

- Must process the removal of the “D” conditions as a Variance, rather than a Zone Change.

NEEDED CEQA ACTIONS

Environmentally Superior Project: Hollywood Heritage agrees that the environmentally superior Project for this site is Alternate #5. The site development would be limited to what is allowed by zoning, which would enable to project to be significantly less adverse to historic resources. As the DEIR showed no evidence of conforming to commitments made on environmental leadership, and as “workforce housing” still means \$2,500 - \$3,000 month rent/unit, (and no commitment to how many units) the environmental superiority is of the code-compliant project is evident. *Details provided in Attachment #5.*



Needed corrections to facts and analysis: Throughout this letter Hollywood Heritage has pointed out factual errors and analytical conclusions which must be corrected in the FEIR. The preferred method of correction is changing the project so that the issues do not occur.

Needed Mitigation Measures:

- **MM2- (Cultural Resources): Attie Building Rehabilitation Plan:** The Attie Building will be submitted for Cultural Heritage Monument consideration, with an attached Preservation Plan as a part of the nomination showing a Standards-compliant approach to the restoration, including the storefront reconstruction. The nomination must be accepted by the Cultural Heritage Commission for consideration prior to the start of any demolition associated with the project and any alterations on the Attie Building.
- **MM3: (Cultural Resources): Attie Building Preservation Monitoring:** Any alterations or restoration/rehabilitation at the Attie Building shall be directed by and monitored in accordance with a Preservation Plan. Submittal to City of Los Angeles, Office of Historic Resources required for review of findings and plans for restoration. Submittal process and review should be integrated into overall construction schedule.
- **MM4-(Cultural Resources) Infill Building in Historic District:** The new Hollywood Boulevard building will be redesigned to make a building which contributes to the District.
- **MM5-(Cultural Resources) Mark Twain Hotel mitigations:** The project impact to the Hotel through the excavation and vibration associated with new construction has been addressed. But mitigations to lessen impacts on the operation of the neighboring hotel during construction, and a re-design of the project to eliminate the un-relieved huge solid wall outside the Mark Twain windows, must be required.
- **MM (Land Use): Floor Area Averaging Removes all Developable FAR from 2 Hollywood Boulevard Lots:** The use of the lot area of the Attie Building and a neighboring building within the Historic District to contribute to the project's allowable FAR/development means that the proposed Vesting CUP to allow Floor Area averaging in a Unified Development means that a deed restriction must be put on those parcels prohibiting any future redevelopment, and the D conditions be re-written to reflect the absence of developable floor area (other than historic repair of current square footage)
- **MM (Transportation):** The project shall achieve 15% Leadership goal as agreed.
- **MM (Land Use):** Compliance with Hollywood Boulevard Urban Design Plan required
- **MM- Prevailing wages -** this is a requirement of the Leadership agreements executed by the Developer with the State. This requirement must be made a permanent requirement for the Project in the event the Developer sells the project—or the EIR process will need to be re-instated
- **MM – LEED Gold** – see above re Leadership agreements.

Given the severity of the problems with the new building design it appears that a façade redesign, a significant size reduction, and especially a redesign of the south-facing portion must be done prior to sending out the FEIR.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Richard Adkins". The signature is written in a cursive style with a large, stylized initial "R".

Richard Adkins
President, Hollywood Heritage Inc.

Attachment #1
DETAILED DISCUSSIONS

**Attie Building Restoration-
Ensuring no Adverse Impact**

History and Significance: The Attie Building, at 6436 – 6440 Hollywood Boulevard, has long been acknowledged as historically significant. Appendix D cites the listing as a ID, being a contributing structure to the Hollywood Boulevard Commercial and Entertainment Historic District listed on the National Register of Historic Places and the California Register.

The Attie Building's Art Deco style, designed by Henry Minton (a prolific architect for Bank of Italy/Bank of America buildings), was built in 1931. Its 9,000 sf is mostly in a 2 story portion at the southwest corner of Hollywood and Wilcox, but it also has a one story wing south along Wilcox Avenue. Entrance to the 2nd story is and was from Wilcox.

The prime period of the District ends in 1939. The District is a rare District listed at the highest level of significance in the nation. The Attie Building restoration, therefore, should focus on the building appearance up to 1939. Appendix D provides a well-researched and detailed history of the building's construction and architect places the building in the context of the architect's work and identifies visible extant important features.

HCM: The historic consultant concludes that the Attie Building is eligible of as a Cultural Heritage Monument, and we agree.

Follow-up action on Attie Building: The DEIR Appendix D concludes “no adverse effect” of the Attie Building restoration, based on the threshold that “alteration of a significant resource that does not conform to the Secretary of the Interior Standards will result in a significant impact.” (page 30) Section IV Cultural Resources of the DEIR evaluates the proposed “restoration” based on applicable items from the Secretary of Interior Standards. The analysis on page IV.B-32—including recasting of missing terra cotta spandrels, storefront reconstruction, etc-- is good.

Follow-up using the Secretary of the Interior Guidelines for Rehabilitating Historic Buildings normally includes *identifying, retaining and preserving* character-defining features. A detailed approach is as follows:

~~Identifying character-defining features:~~ The DEIR does not provide a comprehensive investigation of all areas and surfaces of the identified historic resource. Visual examination and The Non Destructive Evaluation Façade Investigation Report and Addendum do not provide conclusive determination of historic construction or materials that may be extant. Without selective removal of non-historic materials obscuring interior walls and exterior façades a complete inventory of remaining historic construction and materials is not possible, and thus the proposed design's accuracy cannot be concluded.

2. Retaining and preserving character-defining features: A commitment to the restoration/rehabilitation of this building should be ingrained in the project in order to support any conclusion that the project before us does not adversely affect the Attie Building. The standard requirement is a Rehabilitation Plan, which provides guidance required to preserve character-defining features and the platform for reconstruction of missing components based on physical evidence. The Rehabilitation Plan includes the following components
 - List of qualified preservation architect, architectural conservator and specialty contractor consultants to perform further documentation,
 - Condition Assessment Report (material condition assessments, analysis and removal of non-historic materials potentially obscuring historic building fabric). Documents findings--evaluation of historic materials to be performed by architectural conservation professional, (Architectural Conservator) member of American Institute for Conservation, PA or Fellow. Report includes written assessment, photographic documentation, testing and analytical report documentation that may be required to characterize historic finishes.
 - Protection Plan outlining methods and means for protection of historic structure before and during construction. Protection Plan to be integrated with overall construction schedule and should incorporate anticipated changes of protection materials and locations depending on construction activity, as well as monitoring needed to protect from over-demolition.
 - Removal Plan outlining methods and means for removal of interior and exterior non historic materials, documentation of findings and timetable for work to be performed including integration with construction schedule. This work will be required to implement rehabilitation/restoration measures.
 - Treatment Plan prepared by Architectural Conservator and Preservation Architect based on findings documented in Condition Assessment Report. The Treatment Plan outlines methods and means for cleaning, repairs, reproduction of losses (where necessary and approved) of historic fabric. Integration of the Treatment Plan integrated into overall construction schedule.
3. Restoration Planned- correct errors in DEIR: The DEIR on Page 11-10 mistakenly says the Attie building restoration will comply with the building code for new construction under Sec 3404A of the Building Code. That is the code for hospitals. Section 34 has been moved to the California Existing Buildings Code, and the code says the opposite: the Attie Building is entitled to existing non-conforming rights, and additionally is eligible for use of the permissive sections of the State Historic Building Code.

Special attention to Attie Building storefront investigation and design:

1. Storefront on Wilcox: Page IV.B-32 of the DEIR states that no physical evidence of the storefronts exists, and no physical evidence of earlier storefronts was revealed. But the exploration—as noted above—was incomplete. Photographic evidence from 1934

show clearly the needed evidence on Wilcox at the 1 story-portion of the Attie Building: a sign band, awnings (thus confirming an awning pocket), and by implication storefront windows for stores. The same is evident on Wilcox at its corner with Hollywood.

2. Storefront column spacing in 1939: Hollywood Heritage believes the storefront design proposed by the Project is not accurate. Up to 1939, it appears the storefront rhythm existed in keeping with the 2nd floor terra cotta pilasters on Hollywood Boulevard. Page IV.B-32 of the DEIR states that no physical evidence of the storefronts exists. However, in the report itself photos of the store interiors showing that the column lines on the interior appear to align with the 2nd story terra cotta pilasters on the building front.
3. Better storefront restoration: This suggests that the Attie Building street level design matched every other terra cotta building of its time period—with columns roughly 16' on center at the front of the building, likely clad in terra cotta, or located immediately behind the glass. Photo evidence from 1933, 1934 and 1938 confirm that when the single tenant building sign band was divided into 2 tenants, it aligned with the 2nd floor terra cotta pilaster. Good assumption is that through 1939 the column lines came to the ground. Later post 1940's storefronts such as Graysons and Florsheim did not honor that line.

Suriya mural having historic significance, and follow-up:

1. You Are The Star by Thomas Suriya, 1925. The DEIR provides adequate documentation of the mural identifying the artist and past restoration efforts. While reporting that the mural is identified by the *Mural Conservancy of Los Angeles*, it does not clarify whether or not the mural is registered with the City of Los Angeles Department of Cultural Affairs (CAD) and thus falls under the stewardship of the Department of Cultural Affairs which oversees mural conservation efforts. *The FEIR must clarify this stewardship.*
2. Follow-up on Mural: A comprehensive mural Condition Assessment and Treatment Plan following the guidelines and standards provided by CAD is missing. Condition Assessment will provide a detailed description of condition issues and recommended mitigation measures to be detailed in a comprehensive Treatment and Protection Plans. The Treatment Plan and Protection Plans should be integrated into the larger construction plan. Conservation/restoration efforts should be performed by a mural/paintings conservator with membership in the American Institute for Conservation, PA or Fellow.

Attachment #2
DETAILED DISCUSSIONS

**Impact of Demolition and Infill Replacement Building
(6430-6434 Hollywood)**

The DEIR concludes that the demolition of 6430-34 Hollywood Boulevard and the new construction replacing it have no significant adverse effect. *Hollywood Heritage* sees “follow-on” work needed in order to finalize that claim.

DEIR approach: CEQA says: “A project with an effect that *may* cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.” DEIR cites the following sources: recently re-issued State CEQA guidelines, as well as the CEQA statute itself, and the City of Los Angeles 2006 LA CEQA Thresholds Guide as sources to interpret what the law means.

Each of these documents focuses on, or boils down to 2 questions relative to the demolition and new construction of the “non-contributing” building in the National Register District at 6430-6434 Hollywood Blvd.:

- Is a significant resource being demolished, relocated, or altered? AND/OR
- Is there construction that reduces the integrity of important resources on the site or in the vicinity?

Cited guidelines and thresholds don’t address this Project: These guidelines and thresholds never overtly address the situation here: demolition of a non-contributing building (6430–34 Hollywood Blvd) within this National Register District, and the effect of a new building on that District. The guidelines and thresholds appear to address only material (“physical”) effects when a project involves individual historic buildings, rather than dealing with new infill or neighboring buildings and their effects on historic districts.

1. Direct adverse effects on Attie Building (on project site):

- There is an adverse effect omitted from the DEIR-- the effect of blocking windows on the east side of the second floor of the Attie Building. Whether this is significant should be addressed in the FEIR.
- The DEIR does look direct impacts such as that of shoring, drilling and vibration. Page 22 of DEIR states that mitigation measure NOI-MM-2 limits the vibration levels in regards to the Attie, 6430 Hollywood, and Mark Twain Hotel (.12 PPV for Attie, .20 PPV for 6430 Hollywood, .3 PPV for Mark Twain).

2. Direct adverse effect of demolition of 6430-34 Hollywood Boulevard:

- Potential significance: The DEIR in Appendix D provides a full history of the buildings, and a description of its many remodellings. It is likely that the conclusion of “not significant” is correct. However, the building was designed by the same Architect for the same client as the Attie Building, at the same time.

The automatic conclusion that non-contributors are not significant is a misunderstanding of historic districts. The automatic conclusion that demolition is not an adverse effect hasn't been conclusively made.

- **Historic Assessment needed:** This building from the Prime Period of the historic district must be assessed for its potential to be treated as a contributing historic resource. It was included within the historic district boundaries for good reason. Without assessing what physically remains of the building, finding historic and other documentation, and without clearly recognizing the urban pattern--how its size, overall structure, etc are a contribution to the District, the EIR conclusion of no effect does not have evidentiary support. The juxtaposition of smaller buildings with their larger neighbors at intersections is a character-defining feature of the district as a whole, particularly in the "core" section in which this project is located.
- **Changing understanding of non-contributors:** In 1985, only buildings built before 1935 which maintained a high degree of architectural integrity could be considered by the Keeper of the Register as contributors to Hollywood Boulevard's historic district. Guidance on evaluating contributing and non-contributing structures has changed over the years:
 - addition of "aspects of integrity", "alterations which have assumed significance over time", and "cultural associations" are being more thoroughly explored.
 - massing and construction of these buildings continues to provide information about the retail structure of the District as a whole, and if a formal amendment to the district nomination were to occur, many of these smaller altered structures would be considered contributors.
 - it is unwise to demolish any noncontributor built during the period of significance as the full impact on the district and its history and methods of construction are not entirely known.
 - This is the oldest section of the Boulevard, and the one whose low rise structures show the roots of the business district's development. While not architecturally interesting, these smaller examples speak to the social and cultural significance of the "Main Street."

The proposed two story replacement will alter this pattern in a pivotal location to the understanding of the District. Further, the connection of this structure to a larger one outside the District does not reflect the system of alleys and other land use patterns of Hollywood.

3. **Adverse effect of new infill construction on District:** HHI agrees with Appendix D that the Secretary of the Interior Standards underlie any analysis of the effect of the proposed Hollywood/Wilcox construction on the Hollywood Boulevard Historic District. However we disagree with the argument in Appendix D that only a design which renders an eligible historic resource ineligible can be the cause of a significant adverse effect under CEQA. This clearly is the wrong threshold for the situation here-- saying an entire mile long historic District must lose its eligibility due to this one project or new building!

- HHI believes the new building does reduce the integrity of the District. With a re-design of the building a District-compatible building is possible.
- The new building at 6430-34 Hollywood is proposed as infill in the Hollywood Boulevard Historic District, and must comply with Standards # 9 and 10, which are more deeply explored in the National Park Service Preservation Brief #14.
- In the case of a new infill building in the District, discussion of “materially impaired” should look at “those physical characteristics of an historical resources *and districts* (inserted by this writer) that justified “its inclusion in, or eligibility for, inclusion in the California Register” and query whether the new infill building—if it had been present at the time of the district boundaries—would have qualified as a district contributor at that time.
- The DEIR failed to provide a clear architectural description of the materials, scale, and styles of the “resource”—in this case the District. Vague statements about “heights vary” are lazy and misleading. This District has distinct urban patterning, captured in the nomination – its low rise buildings form consistent building line storefronts, providing a pedestrian-friendly shopping street ambiance, protected by awnings; the tall “height limit” bank and office buildings generally mark main north/south streets.
- Preservation Brief #14 states that the building height is the most important aspect of compatibility. In this case the choice made for height is compatible enough if the infill building has been justified.
- The design error in the proposed new infill building is the expression of the building as 2 story attention-getting, bright, building-high frames, infilled with curtain-wall like glazing. The effect is Rodeo Drive in 2000. The District clearly has side-walk level storefront usually on a bulkhead, and 2nd floor punched openings, clearly distinguished. The District has tangible, stone-like (“lithic”) materials. The District stylistically has a predominance of certain styles in the low rise sections.

1993 UDP: The City of Los Angeles is now responsible for reviewing infill buildings in this historic district, pursuant to the transfer of responsibilities from CRA. The intent of having a published Urban Design Plan was to take away any inkling of arbitrariness in design review, giving clear cut standards for new infill buildings to follow. This Projects proponents fought the adoption of a less stringent Urban Design Plan in 2019, so for the moment the 1993 Plan prepared by CRA and reviewed by its Board must be used in order to assess conformity with the Redevelopment Plan.

The 1993 Urban Design Plan reflected the actual urban patterning of the Boulevard. It locates the Attie Building and the infill building in the “Main Street” and “Boulevard Mixed Use” portion of the Plan. When written, this Plan jived with the zoning which remains in place today.

Feature	1993 Design Guidelines	Proposed Design	Compl ies?

Height		Approx 45'	Yes
Material	Stone, terra cotta glazed to resemble stone, brick, cementitious materials (Sec. 7.5.A)	Doesn't say? Likely cementitious materials	Yes
Color	Light color palette - earth tones, creamy pastels, highlighted by brighter and darker accent colors (Sec. 7.5.A)	White, no accent colors	No
Opacity	"between heights of 3 and 12 feet, storefront areas should be a minimum of 60% clear glass. storefronts should incorporate transoms of clear glass and/or detailed fascias" Sec 7.4.A.6 (pg. 7-21)	Over 60% clear glass	Yes-
	Upper floors		
Glazing	Use of clear glass is strongly encouraged but glazed areas should be differentiated in color from building's surface materials (7.5.B)	No differentiation	No
Facade Depth	Boulevard buildings are typically articulated by windows which are punched in solid masonry or masonry-like surfaces while other elements, such as sills or ornaments, create contrasting areas of light and shadow" Sec 7.4.A.3 (pg. 7-16)	Not punched windows	No
Storefront	"overall proportion of a storefronts should be approximately square and should have a maximum ratio of 1.5 feet of height for each foot of length"	??	No
	"the design of recessed entries to storefronts... is strongly encourages with new infill construction" (7.4.A.6 (pg. 7-16)	Not recessed	No

Attachment #3
DETAILED DISCUSSIONS

**Impact of New Construction (1624-44 Wilcox) on Historic District
And Mark Twain Hotel**

Impact of New Construction on an Historic District:

On page 42 of the Executive Summary, the DEIR poses that the new construction may have indirect impacts on the Hollywood Boulevard historic district as a whole.

- Is there construction that reduces the integrity of important resources on the site or in the vicinity?

CEQA threshold: Again Hollywood Heritage disagrees with the argument in Appendix D that only a design which renders an eligible historic resource ineligible can be the cause of a significant adverse effect under CEQA. This clearly is the wrong threshold for the situation here-- saying an entire mile long District must lose its eligibility due to this one project or new building!

Help comes in the form of Federal guidelines, implemented by the State of California. The vicinity to be evaluated is defined in 36 CFR § 800.16 as the: "geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking"

Again, as in the discussion of the infill building in the District, the guidance comes from the Secretary of the Interior Standards, especially Standard 39, and the discussions in Preservation Brief # 14. The predominant effect which can be significant and adverse is height.

There are generally recognized principles for threshold effect on historic districts:

- Cutting a district in half (visually or physically) so it loses continuity as a District;
- Overshadowing or lopsiding a District with new construction so its principal formal structure is compromised (such as overshadowing or removing a church on a New England town square);
- Creating such an offence or a distraction-- such as with billboards, wild colors, large amounts of glass, above grade parking garages, unadorned walls, etc-- that the continuity and features of a District are obscured.

This project crosses these usual thresholds for significant adverse effect. As in the analysis of the new infill building, the effect of on the District was not analyzed in the DEIR from a position of specificity about the District's architectural qualities. *The FEIR must include and urban design*

description of the urban patterning and qualities of the District, and evaluation of the current design—300% height, attention-getting, bold colors, random frenetic pattern, unrelenting bulk in 2 directions, non-natural color, etc. Either the design is significantly corrected, or the project has a significant adverse effect.

1993 UDP: Again, as discussed in the analysis of the infill building, the guidance provided by the 1993 Urban Design Plan illustrates how the proposed building design is a significant adverse effect on the Boulevard Historic District.

The 1993 Urban Design Plan reflected the actual urban patterning of the Boulevard. It locates the Attie Building and the infill building in the “Boulevard South” and “Residential Mixed Use” portion of the Plan.

Feature	1993 Design Guidelines	Proposed Design	Complies?
Density	2:1 or 118,780 sf	278,692 sf	No
Height	75'	160'	No
Material	Stone, terra cotta glazed to resemble stone, brick, cementitious materials (Sec. 7.5.A)	Consists of a fiber cement “outer skin” wall and an inner skin that reveals the buildings’ fenestrations (Appendix D, site plan review supplemental, pg. 15)	No
Color	Light color palette - earth tones, creamy pastels, highlighted by brighter and darker accent colors (Sec. 7.5.A)	White walls with “prominent bands of color” in yellow ,red, and orange and metallic accents (Appendix D, site plan review supplemental, pg. 34)	No
Modulation	“To maintain the small scale built form pattern which evolved based upon the original parcelization, street facades should not exceed 100 ft in length unless separate by a 10 ft deep by 20 ft court or setback at each inhabitable level” (Sec 7.4.B.1)	Facade is one monolithic block for over 200’-- which does not reflect the two underlying lots it occupies or meet guidelines	No
Facade depth	“Each wall surface shall incorporate facade depth through the use of individual windows set into the walls surface, facade surface breaks, shadow lines, articulation of edges reveals, change in material and ornamentation” (Sec 7.4.B.3)	Windows treated as planes or panels, not as individual windows set into walls. No articulation of edges.	No
Balconies	“should be integral to a building’s form and mass and should be a minor element in the definition of a building’s character		No

Impact of New Building on Mark Twain Hotel:

The Mark Twain Hotel, at 1622 Wilcox Ave, is a 1921 Spanish Revival with a rare Mission motif, located immediately south of the Project .

The structure was recently identified as a 3CS/5S3 in the CRA/Architectural Resources Group Hollywood Historic Resources Survey 2019. It is a significant property associated with the African American community in Los Angeles, being the last remaining hotel listed in the Green Book, an African American travel guide, between 1949 and 1961. This property was one of relatively few hotels where African American travelers were welcome prior to the Civil Rights movement.

Direct effects from construction vibration and excavation will be required to protect the physical building from adverse effect.

The design of a massively tall unbroken concrete or otherwise solid wall along the south project property line, plus the damage of the construction period, will be a severe adverse impact on this structure. The 1993 Urban Design Plan additionally requires that portions of parking structures visible from public sidewalks and streets shall comply with the built form policies, standards, and guidelines.



Attachment #4 **DETAILED DISCUSSIONS**

Land Use

Quantitative Background: The project has assembled a site with 2 parcels fronting on Hollywood Boulevard (6340-44 and 6356-40 Hollywood Boulevard) and 4 additional parcels. Two of those parcels have existing buildings 1624 Wilcox and 1626-28 Wilcox.

1. Parcel Area: The area of the parcels calculates at 59,390 sf using City records. There appear to be 3 sources of errors or complications. The land area reported in the DEIR is higher. The Project appears to show construction on a 15' varying width easement along Wilcox which not "owned" by the developer. The Easement # 94-135253 must be explained. The Assessor and the City Public Works Department do not show this as a part of the property owned by the developer.
2. Allowable Density: The Land Use section of the DEIR states that the developer requests an FAR of 4.5:1. The current zoning allows 2:1.

The DEIR omits all the needed facts and figures to understand the project; the land parcel sizes; the proposed unit mix; the parking calculation, etc. The FEIR must accurately present the Project.

The DEIR underplays the most important facts about entitlements :

- that the current zoning of "2D" allows a 2:1 FAR—not the 4.5:1 proposed on the combined lot areas, or as erroneously stated on page 8 an "allowed" 6:1. To reach 4.5:1, the "D" condition must be removed -- by conformance with the CRA's Redevelopment Plan, Boulevard Urban Design Plan, and Transportation Plan. These are not addressed or evaluated in the DEIR. The developer may purchase and transfer development rights for the requested 2.5 X density.
- that the R5 density claimed for residential density in the Hollywood Community Plan literally does not exist. The Community Plan "High" density category is 60-80 DU/acre. The 1988 Community Plan allowed R5 uses on specific parcels- the City has been mistakenly interpreting this as R5 densities.
- Project density in this case exceed maximums under the Community Plan and Redevelopment Plan

	Area	Allowed Zone	Allowed Density per Zoning	Requested	Allowed /Requested Height UDP
6430 -4 Hwd Bl	6,513 sf	C4-2D-SN	2:1 = 13,026 sf	9,000 sf	45/
6436-40 Hwd Bl	6,487 sf	"	2:1 = 12,974 sf	12,974 sf	45/
1644 Wilcox	12,727 sf	C4-2D-SN			75/160
No address	4, 410 sf				"
1634 Wilcox	12,737 sf				"
1626 Wilcox	12,466 sf				"
1624 Wilcox	3,819 sf				45/160'
	59,390 sf		118,780 sf	278,692 sf	

	Area	Dwelling Units	DU/Acre Request	DU/Acre HCP	DU/Acre CRA
Residential	261,092 sf	260	260/1.363=190	80 max	80 max 130 max*
Other	17,800 sf				
Retail	11,020 sf				
Office	3,580 sf				
Restaurant	3,200 sf				
	278,692 sf				

* if compatible in character, scale, and architecture of the neighborhood (Sec 505.1 Redevelopment Plan)

Zoning:

- Inadequate discussion of clearing of D condition: As noted above, *the FEIR must accurately state the findings that City Planning and the Redevelopment Agency must make in order to clear “D” condition.*

“Workforce Housing” as a substitute for affordable housing: The DEIR proposes setting aside “up to 10 percent” of units for workforce housing. The gesture of an undetermined percentage of workforce housing units does not contribute to City policies meant to ameliorate the impacts of the affordable housing crisis.

The Project Description fails to specify the income level at which these units will be offered, or even an exact percentage of units.

- The Los Angeles Housing and Community Investment Department (LAHCID), defines workforce housing as 150% Area Medium Income (AMI) (Appendix I.1).
- Given the extreme nature of the housing crisis and the disproportionate impact on low-income people, workforce housing has not been named a City priority.
- The 2018-2023 Assessment of Fair Housing 2018-2023 Fair Housing Goals and Priorities of City of Los Angeles & HACLA Los Angeles “encourage[ing] developers to produce affordable housing in new housing developments” as one of the City’s highest housing priorities (Goal I.1). It reports that with 713,710 households under the 80% AMI threshold, Los Angeles “has a significant shortage of housing affordable to lower-income households.”
- The 2014-2021 Regional Housing Needs Assessment (RHNA), another guiding document for housing development does not set allocations for workforce housing.
- A 2019 study from the Embarcadero Institute reveals that Los Angeles county met 23% of its low-income housing RHNA target for 2018, (approving only 10,826 of the expected 47,935 units), but surpassed their market rate housing target by 207%.

Failure to meet Redevelopment Plan Goals

The proposed project appears to exceed an FAR than 4.5:1 as stated, but the true question is why—given current zoning, is a discussion of 4.5:1 pertinent? The 4.5:1 is NOT an entitlement.

The DEIR on page 86 claims conformance with Redevelopment Plan goals in Section 300. That Section of the Redevelopment Plan did not transfer to the City of Los Angeles.

The FEIR must analyze the Redevelopment Plan Land Use Section, and the compliance of this Project with the quantitative and procedural parts accepted by the City, rather than declare compliance with goals.

Parking: The Project is described as having 420 parking spaces. The unit breakdown does not appear to be included in the EIR, nor the parking calculation. Pg. 4 of the Transportation chapter says, because the project is in a transit priority zone "the Project's aesthetics and parking impacts shall not be considered significant impacts on the environment" pursuant to PRC Section 210999.

The FEIR should show how parking is calculated, and how the Project is offering the 15% improvement, and ensure the spaces are “unbundled” per agreement.

This table shows how parking calculations might have been reached, suggesting that parking is provided at normal rates. (The Redevelopment Area, which has always been transit rich, has always allowed a reduction in parking spaces.)

	Area	Dwelling Units	Parking/x	Est Redev	Est Standard
Residential	261,092 sf	260	Unclear unit mix – assume 1 BR-	325 spaces	390 spaces
Other	17,800 sf		1/500 sf	35.6 spaces	35.6 spaces
Retail	11,020 sf				
Office	3,580 sf				
Restaurant	3,200 sf				
	278,692 sf			410.6 spaces	425.6 sp

As the Project is being constructed on parking lots which have been used to support existing businesses in the Boulevard historic District, and as CRA studies have shown a shortfall of roughly 500 spaces in this mid- section of Hollywood Boulevard, Hollywood Heritage recommends that in order to deliver on public benefit the Project provide an equal number of parking spaces for the general public as are being removed from the surface lot.

Attachment #4

DETAILED DISCUSSIONS

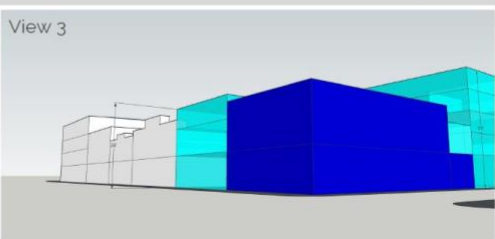
Environmentally Superior Alternative

Alternative 2: Zoning Compliant Mixed-Use Alternative

- Developed in accordance with existing C4-2D-SN zoning with FAR limitation of 2:0:1. This would develop 123,952 sqft of uses instead of 278,892.
- Would retain but not restore the Attie
- Uses would be 125 units (no workforce housing) and 14,600 sqft for retail and 3,200 for restaurant (less retail and no office, compared to proposed), 15,000 open space
- 222 parking spaces, .5 ground level and 2 above ground (no 10% reduction in parking compared to proposal)
- New buildings between 1-8 stories, max height 90 ft
- Would not seek certification under AB 900 Jobs and Econ improvement thru environmental leadership

Alternative 5: Proposed Hollywood Community Plan Update Complaint Mixed-Use Alternative

- Under the Proposed Hollywood Community Plan Update the project site would be designated a Regional Commercial Center with a zoning designation of C4-2D-CPIO with FAR limitation of 3:1 and max height of 75 ft
- Would retain but not restore the Attie
- 127,375 sqft of new use - 123 multi-family housing units (no workforce housing), 14,600 sqft for retail and 3,200 for restaurant, 14,375 open space
- New buildings between 1 and 7 stories, max height 75 ft
- 222 parking spaces, 1 subterranean level, .5 ground level and 1 above ground (no 10% reduction in parking compared to proposal)
- Would not seek certification under AB 900 Jobs and Econ improvement thru environmental leadership
- Does not say if they would keep 6434 Hollywood

HISTORIC RESOURCES	ZONING & USES	BUILT FORM	PUBLIC REALM
		MASSING By-Right: 45 feet & FAR 2:1 GBA: 119,109 sq ft Maximum Height: 55 ft	Density Bonus with Affordable Housing Resulting FAR 2.7:1 (Including Density Bonus) Includes open space along Wilcox
			

Jason McCrea
Major Projects Section
Department of City Planning
221 N. Figueroa, Suite 1350
Los Angeles, CA 90012
(213) 847-3672
Jason.mccrea@lacity.org
(Submitted electronically)

Monday April 13th, 2020

Re: **"Hollywood and Wilcox Project"**

Case No. **ENV-2016-3177-EIR**

Addresses: **6430 -6440 Hollywood Boulevard** and **1624-1648 N. Wilcox Ave**

The **Art Deco Society of Los Angeles** appreciates this opportunity to submit comments to the Hollywood and Wilcox Project. The Project includes the Art Deco style "Attie" Building (6436-6440 Hollywood Blvd and 1646-1648 Wilcox).

Attie Building Restoration:

1. The proposed storefronts restoration is inappropriate. Design improvement is warranted.
2. Specificity of restoration work and scheduling must be determined. None is provided.

Attie Building Necessary Mitigation Measures:

1. MM3: (Cultural Resources) Alterations/Restoration/Rehabilitation shall be Monitored by a qualified Historic Architect.
2. MM2: (Cultural Resources) Preservation Plan: The Attie Building will be submitted for City of Los Angeles Historic-Cultural Monument consideration; with inclusion of Preservation Plan demonstrating Secretary of the Interior Standards-Compliant Attie Building storefront reconstruction.

The Historic-Cultural Monument nomination will be accepted by the Cultural Heritage Commission for consideration prior to the start of any demolition associated with the Hollywood and Wilcox Project, including any alterations on the Attie Building itself.

Attie Building Restoration

The Attie Building (6436 – 6440 Hollywood Boulevard) is an identified Historic Resource. Appendix D cites the listing as a 1D, being a contributing structure to the Hollywood Boulevard Commercial and Entertainment Historic District listed on the National Register of Historic Places and the California Register.

The Attie Building's Art Deco style, designed by Henry Minton (a prolific architect for Bank of Italy/Bank of America buildings), was built in 1931. The prime period of the District ends in 1939. The Attie Building Restoration should focus on the building appearance up to 1939.

Section IV Cultural Resources of the DEIR evaluates the proposed restoration:

Conclusion: the Attie Building is eligible as a City of Los Angeles Historic-Cultural Monument.

The report FAILS to provide description of the proposed Restoration/Rehabilitation. A commitment to Restoration/Rehabilitation must be ingrained within the Project Description

Storefront on Wilcox: Page IV.B-32 of the DEIR states that no physical evidence of the storefronts exists, and no physical evidence of earlier storefronts was revealed.

In fact, photographic evidence from 1934 clearly depicts a sign band, awnings (thus confirming an awning pocket), and by implication storefront windows on Wilcox.

Storefront existed in keeping with the terra cotta pilasters on Hollywood Boulevard: the report itself shows that the structural column lines inside align with the larger terra cotta pilasters on the Hollywood Boulevard building front. This suggests that the Attie Building matched every other terra cotta building of its time period—with columns roughly 16' on center at the front of the building, likely clad in terra cotta, or located immediately behind the glass.

Photo evidence from 1933, 1934 and 1938 confirm that when the single bank tenant divided into 2 tenants, the signage split at the terra cotta pilaster line. Through 1939 the column lines came to the ground.

The Art Deco Society of Los Angeles looks forward to providing its unique expertise to the Project Developer, toward completion of the best possible outcome for the Art Deco Attie Building Restoration/Rehabilitation.

Best Regards,

Margot Gerber
ADSLA, President
artdecola.adsla@gmail.com



523 West Sixth Street, Suite 826
Los Angeles, CA 90014

213 623 2489 OFFICE
213 623 3909 FAX
laconservancy.org

April 13, 2020

Submitted electronically

Jason McCrea
City of Los Angeles, Department of City Planning
221 North Figueroa Street, Room 1350
Los Angeles, CA 90012
Email: jason.mccrea@lacity.org

Re: Hollywood and Wilcox Project, 6430-6440 West Hollywood Boulevard and 1624-1648 North Wilcox Avenue, Los Angeles, CA 90028, Draft Environmental Impact Report, ENV-2016-3177-EIR

Dear Mr. McCrea,

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Hollywood and Wilcox Project (Project) Draft Environmental Impact Report (DEIR). The Conservancy, along with Hollywood Heritage, has long been active in protecting and advocating for the historic resources within the National Register-listed Hollywood Boulevard Commercial and Entertainment District where the proposed Project is located.

The Project, as stated in the DEIR will include a 15-story mixed-use building along Wilcox Avenue. New construction will comprise 260 multi-family residences, as well as office and commercial space. In addition to the mixed-use tower along Wilcox Avenue, the Project proposes to construct a new building at 6430-6438 West Hollywood Boulevard, thereby introducing new infill construction within the National Register-listed historic district. The final component of the Project includes the rehabilitation of the historic Attie Building located on the southeast corner of Hollywood Boulevard and Wilcox Avenue.

I. Rehabilitation of the Attie Building

The Conservancy greatly appreciates the Project team's commitment to rehabilitate the district contributor Attie Building. Constructed in 1931 in the Art Deco Style, the Attie Building is a contributor to the National Register-listed historic district under criterion C/3/3 for architecture with a period of significance of 1931-1939.



The mural, painted on the west façade has been found to be potentially significant as a subsequent alteration, one of the oldest and last surviving murals in Hollywood from the early 1980s. The *You Are A Star* mural was painted in preparation for the 1984 Summer Olympics.

As stated in DEIR the Attie Building will be rehabilitated in conformance with the *Secretary of the Interior Standards for Rehabilitation*. We strongly believe it is necessary for the Project team to submit a historic preservation plan for review and approval by the Office of Historic Resources before construction begins. A detailed plan will provide the applicant with a comprehensive guide for rehabilitation work ensuring full compliance with the *Secretary's Standards*.

II. Conclusion

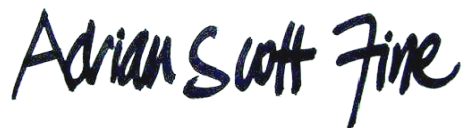
In conclusion, the Conservancy feels it necessary for the Applicant to have a completed and approved historic preservation plan before the rehabilitation of the Attie Building begins. As development continues in and around the National Register Hollywood Boulevard Commercial and Entertainment District, it is vital to protect the district's resources that help convey the Boulevard's feeling and setting. It is essential to find the appropriate balance between new construction and the historic built environment. The Conservancy encourages the applicant to contact us so that we may work together in conjunction with Hollywood Heritage to achieve a project outcome that is sensitive to the surrounding historic environment.

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.

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





Jason McCrea <jason.mccrea@lacity.org>

Hollywood Wilcox building.

latview@aol.com <latview@aol.com>
To: jason.mccrea@lacity.org

Thu, Feb 27, 2020 at 6:32 PM

This looks like one of the buildings they house forced labor workers to live in in China. It's Ugly and awful and doesn't belong. Can we get the tax dollars spent to hire the architect back please?
BA Letofsky
Miracle Mile