

## GENERAL INFORMATION ABOUT THE CONTENTS OF THIS FILE

Submissions by the public in compliance with the Commission Rules and Operating Procedures (ROPs), Rule 4.3, are distributed to the Commission and uploaded online. Please note that “compliance” means that the submission complies with deadline, delivery method (hard copy and/or electronic) AND the number of copies. Please review the Commission ROPs to ensure that you meet the submission requirements. The ROPs can be accessed at <http://planning.lacity.org>, by selecting “Commissions & Hearings” and selecting the specific Commission.

All compliant submissions may be accessed as follows:

- **“Initial Submissions”**: Compliant submissions received no later than by end of day Monday of the week prior to the meeting, which are not integrated by reference or exhibit in the Staff Report, will be appended at the end of the Staff Report. The Staff Report is linked to the case number on the specific meeting agenda.
- **“Secondary Submissions”**: Compliant submissions received after the Initial Submission deadline up to 48-hours prior to the Commission meeting are contained in this file and bookmarked by the case number.
- **“Day of Hearing Submissions”**: Compliant submissions after the Secondary Submission deadline up to and including the day of the Commission meeting will be uploaded to this file within two business days after the Commission meeting.

Material which does not comply with the submission rules is not distributed to the Commission.

### ENABLE BOOKMARKS ONLINE:

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If you are using Chrome, the bookmarks are on the upper right-side of the screen. If you do not want to use the bookmarks, simply scroll through the file.

If you have any questions, please contact the Commission Office at (213) 978-1300.

# SECONDARY SUBMISSIONS

The following submissions by the public are in compliance with the Commission Rules and Operating Procedures (ROPs), Rule 4.3b. Please note that “compliance” means that the submission complies with deadline, delivery method (hard copy and/or electronic) AND the number of copies. The Commission’s ROPs can be accessed at <http://planning.lacity.org>, by selecting “Commissions & Hearings” and selecting the specific Commission.

All materials in response to a Recommendation Report or additional comments which were received by the Commission Executive Assistant electronically no later than 48 hours prior to the Commission meeting AND which do not exceed ten (10) pages including exhibits are included in this file.

Material which does not comply with the submission rules is not distributed to the Commission.

## ENABLE BOOKMARKS ONLINE:

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If you are using Chrome, the bookmarks are on the upper right-side of the screen. If you do not want to use the bookmarks, simply scroll through the file.

If you have any questions, please contact the Commission Office at (213) 978-1300.

September 10, 2018

City Planning Commission  
City of Los Angeles  
200 N Spring St, Room 532  
Los Angeles, CA 90012

City Planning Commissioners,

We are writing to you regarding the proposed mixed-use development at 6200 W Sunset Blvd, including 270 dwelling units and 12,120 square feet of commercial space, cases CPC-2016-1380-VZC-HD-MCUP-ZAA-SPR, VTT-74085, and ENV-2015-3604-EIR. We urge the city to grant the Vesting Zone Change and Height District Change from C4-2D-SN to (T)(Q)C4-2D-SN; amend the existing D development limitation to allow FAR of 4.5:1 in lieu of 2:1; grant the Zoning Administrator's Adjustments for side yards and use of the site's pre-dedication lot area for calculating density and FAR; grant the Master Conditional Use Permit (MCUP); approve the Site Plan Review; approve the Vesting Tentative Tract Map; and find that no subsequent EIR, negative declaration, or addendum is required for the project.

The greater Los Angeles region is facing a severe housing shortage. This project will provide much needed housing. By creating new housing in a desirable neighborhood, it will help to reduce issues of gentrification and displacement in other parts of the region. Abundant Housing LA believes that these housing challenges can only be addressed if everyone in the region does their part.

This project is in a great location for housing. It is just four blocks from the Metro Red Line station at Hollywood/Vine, and is directly served by Metro Bus (Route 2/302 on Sunset, Route 210 on Gower) with many additional Metro Bus routes close by on Hollywood Blvd (Routes 212/312, 217, and 780). The area is also served by DASH Bus service. It provides good access to employment centers in Hollywood and good transit access to employment centers in downtown LA, Koreatown, and Universal City. In addition, many desirable neighborhood amenities such as restaurants and retail are in easy walking and bicycling distance.

This project is a good project for Los Angeles and for the region. Again, we urge the city to grant the Vesting Zone Change and Height District Change, amend the D development limitation, grant the Zoning Administrator's Adjustments, grant the MCUP, approve the Site Plan Review, approve the Vesting Tentative Tract Map, and find no further environmental documentation is required for this project.

Best Regards,

The Abundant Housing LA Steering Committee:



Matt Dixon  
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August 31, 2018

City Planning Commission  
200 North Spring Street, Room 532  
Los Angeles, CA 90012  
c/o Alejandro Huerta  
*E-mail: [alejandro.huerta@lacity.org](mailto:alejandro.huerta@lacity.org)*

Re: Objection to Approval of CPC-2015-2025-DB-MCUP-CU-SPR and  
Related case no. VTT-73568 and certification of Environmental Impact  
Report ENV-2015-2026-EIR State Clearinghouse No. 2015101073;  
Request for Continuance of September 13, 2018 Hearing on Crossroads  
Hollywood Project

Honorable Commissioners:

On behalf of Livable LA, we object to the approval of the Crossroads Hollywood Project and certification of the environmental impact report (EIR) for it. We have previously submitted objections to staff which we reiterate here and we have the following additional objections.

We request that the hearing for the Crossroads Hollywood project (the Project) set for September 13, 2018 before the City Planning Commission be continued to allow time for the hearing to be consolidated with the hearing of our appeal of Vesting Tentative Tract Map VTT-73568 (VTM) and public review of the associated material, including modifications to the Project and a 399-page EIR Errata, that has recently been made available. Piecemeal review violates the California Environmental Quality Act (CEQA) and Los Angeles Municipal Code section 12.36's requirement for processing multiple approvals together. The Site Plan Review portion of the Project should not be heard separately from the appeal of VTM 73568, and the appeal of VTM 73568 should not be set for hearing without sufficient notice.

Without waiving any prior objections, we object to the following defects in the Project review process and Final EIR as raised in our May 14, 2018 letter to staff.

**1. The New Stand-Alone Parking Structure Will Have Impacts That Must Be Analyzed in a Recirculated EIR.**

When a lead agency adds “significant new information” to an EIR after the public has reviewed the Draft EIR but before the agency certifies the EIR, the agency must pursue an additional round of consultation by recirculating the revised Draft EIR to the public. (Pub. Resources Code § 21092.1.) New information is “significant” if, as a result of the additional information, “the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect.” (*Laurel Heights Improvement Assn. v. Regents of Univ. of California* (1993) 6 Cal. 4th 1112, 1129, CEQA Guidelines, Cal.Code Regs., tit. 14, § 15088.5, subd. (a).)

The FEIR states the Modified Project includes “the addition of Development Parcel E, which would be located at the terminus of Cherokee Avenue at Selma Avenue... for the construction of a stand-alone parking structure north of the Blessed Sacrament Church.” (FEIR, p. II-272.) Because this new structure was not included in the Draft EIR, its potentially significant impacts on traffic, air quality, aesthetics, historic resources, and noise among other impacts, should be disclosed in a recirculated EIR.

**2. The Newly-Created Economic Feasibility Review Does Not Support Rejection of Alternative 5 as Economically Infeasible.**

An environmentally superior alternative that avoids significant impacts may not be rejected merely because it would cost more and create a lower rate of return for a project. Rather, evidence is required showing the alternative would be impracticable. “The fact that an alternative may be more expensive or less profitable is not sufficient to show that the alternative is financially infeasible. What is required is evidence that the *additional* costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project.” (*Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal.App.4th 587, 599 [quoting *Citizens of Goleta Valley v. Board of Supervisors*, *supra*, 197 Cal.App.3d at p. 1181, *italics added*].) In *Preservation Action*, the court invalidated a city’s rejection of a reduced-size alternative for a proposed home improvement warehouse project on a site occupied by an unused historic building. The court stated “The administrative record does not contain any evidence that the reduced-size alternative would be so much less profitable and produce so many fewer tax dollars that the project would be impractical.” (*Preservation Action Council v. City of San Jose* (2006) 141 Cal.App.4th 1336, 1357.) Similarly, in the present case there is insufficient evidence to support rejection of Alternative 5.

The FEIR claims that a newly-prepared economic analysis shows Alternative 5 cannot provide the financial ability to rehabilitate five on-site historical resources. (FEIR, p. II-13.) The evidence presented in the Economic Feasibility Review—Crossroads Hollywood and Peer Review in Appendix FEIR-2 of the Final EIR does not provide sufficient evidence to support a claim of economic infeasibility. As found by independent economic analysis, this conclusion is defective for several reasons including: the “estimated land cost” should have been lower than provided; estimated construction costs for Alternative 5 have an unreasonably high markup for general allowances and soft costs; the Feasibility Review improperly assumes losing 2/3 of useable space due to historic preservation (1,432,500 SF for original project compared to 474,018 SF for historic preservation); the Feasibility Review underestimates the Lease/SF revenue associated with a historic preservation alternative; and the Feasibility Review model assumes no debt financing with beneficial tax breaks and a higher return on equity a developer could receive under Alternative 5. Furthermore, it appears the assumptions in the FEIR’s economic analysis failed to account for rehabilitation cost savings that could be realized through application of the Historical Building Code. (<http://ohp.parks.ca.gov/pages/1074/files/2016%20CA%20CHBC.pdf>.) The FEIR improperly rejects the economic feasibility of Alternative 5.

The Kosmont report did not use capitalized value of long term ground leases. The land use rent, if it has been negotiated and finalized, must be shown or calculated to the present value.

### **3. Alternative 5 Meets Most Project Objectives.**

The FEIR asserts that Alternative 5 Does not “fully meet” the majority of project objectives. (FEIR, p. II-9.) The FEIR asserts that Alternative 5 would create “greater impacts... on existing historical resources...since a greater number of historic resources would potentially be impacted by underground excavation and construction on all four development parcels.” (FEIR, p. II-9.) This assertion is ridiculous because Alternative 5 can easily be conditioned not to create such impacts. The FEIR asserts that surface water quality impacts will not be improved as under the project but, again, Alternative 5 could be conditioned to provide these benefits. Finally, the FEIR states noise and vibration would be greater to sensitive receptors that “remain on-site.” (FEIR, p. II-9.) However, as the FEIR elsewhere states, impacts to on-site residents or users is not a factor in CEQA analysis unless the project exacerbates an existing condition. (FEIR, p. II-20 citing *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4<sup>th</sup> 369.)

There are four cultural heritage nominations for buildings at the Crossroads brought by the Aids Healthcare Foundation and the Art Deco Society and recommended

by the Cultural Heritage Commission. These nominations should be approved, and no further decisions should be made about the VTM or Site Plan until those nominations are decided upon.

#### **4. The FEIR Fails to Adequately Respond to Comments Regarding Traffic Impacts.**

The FEIR fails to adequately address the objections Caltrans and we raised regarding the Project's impacts to the US-101 Freeway.

Caltrans stated the CMP methodology used in the EIR is "not adequate when analyzing freeway impacts." (FEIR, II-63.) Rather than use an adequate methodology, the FEIR responds that an October 2013 Freeway Analysis Agreement somehow absolves the City from conducting adequate analysis. It does not. Caltrans' objections identify a significant issue that has not been mitigated.

Caltrans further requested a Traffic Mitigation Agreement be signed prior to circulation of the Final EIR. (FEIR, p. II-65.) However, the FEIR states the City does not view such an agreement as a defensible mitigation measure. Nonetheless, the City claims "a significant unavoidable cumulative impact on Caltrans facilities would occur." (FEIR, p. II-66.) As we stated in our comment letter, such impacts must be mitigated. (FEIR, p. II-277.) The City may not adopt a statement of overriding considerations for cumulative traffic impacts when feasible mitigation measures such as the traffic mitigation agreement have not been adopted. (Pub. Resources Code § 21081.)

The size of the Project must be reduced to reduce the impacts to Caltrans facilities. (FEIR, p. II-277.) However, the FEIR fails to address this feasible mitigation measure.

All other parcels in the nearby area include a condition that an approved Transportation Plan has been approved by CRA, implemented by the CRA. The CRA prepared the Plan but it has not been approved by the CRA Board or implemented. An approved Transportation Plan must be required.

#### **5. Greenhouse Gas Emissions Analysis and Mitigation is Inadequate.**

The FEIR defends the use of a business as usual or what is termed a "No Implementation of Energy Reduction Measures (NEIRM)" scenario as being included to "demonstrate the efficacy of these measures for informational purposes only." (FEIR, p. II-283.) The FEIR's attempt to take credit for measures that must be implemented in any case is misleading. The baseline scenario must assume these legally required mitigation measures will be implemented.

The FEIR states the project will “not result in any net additional GHG emissions . . . with the purchase of emission offset credits.” (FEIR, p. II-283.) The Project must avoid additional GHG emissions through reduction of emissions and implementation of measures to avoid creating new emissions. Reducing the size of the Project would reduce its emissions.

**6. The Development Application for the Hollywood Center (Millenium) Project Reveals Cumulative Impacts that Must be Analyzed in the EIR.**

On May 4, 2018, the City made available the Application for Environmental Leadership Development Project for the Hollywood Center Project (Millenium project). This Millenium project will have cumulative impacts with the proposed Crossroads Project that should be analyzed in the EIR.

**7. Liquefaction Can Create Significant Impacts.**

The FEIR states that the General Plan Safety Element’s classification of the sites a “susceptible to liquefaction” is “outdated” and proceeds to state various sources that have not identified the site as subject to liquefaction. (FEIR, p. II-20.) However, the General Plan is the authoritative source for information, not to be overruled by a zoning map or imprecise State of California map referenced in the FEIR. The General Plan is the “constitution for future development” and is located at the top of “the hierarchy of local government law regulating land use.” (*DeVita v. County of Napa* (1995) 9 Cal.4th 763, 773.) The FEIR seeks to sweep liquefaction issues under the rug by claiming the area is not in a liquefaction hazard zone. (FEIR, p. II-21.) The EIR’s treatment of land use consistency is inadequate because of its failure to address the General Plan Safety Element’s identification of the susceptibility to liquefaction other than by saying it is outdated. The FEIR reveals a potentially significant impact that requires recirculation of the EIR so the public and public agencies may evaluate why the FEIR asserts the City’s General Plan Safety Element is incorrect. Construction in an area subject to liquefaction exacerbates those risks.

**8. Impacts to LAUSD Schools Will Be Significant.**

The Los Angeles Unified School District states “Based upon a review of the Draft EIR, the proposed project will have a significant impact on LAUSD schools.” (FEIR, II-80.) LAUSD’s Hollywood High School and Selma Avenue Elementary School campuses would be located within 0.25 mile of the proposed project Site. These significant impacts would occur in the areas of air quality, noise, traffic, and pedestrian safety impacts. The significant impacts on LAUSD schools, which were not identified in the Draft EIR, requires recirculation of the EIR for public review to ensure the proposed mitigation

measures actually reduce the newly-identified significant impacts below a level of significance.

**9. Air Quality Impacts Would be Significant But Feasible Mitigation Measures Are Impermissibly Omitted.**

SCAQMD staff recommended “additional mitigation measures to further reduce construction and operational emissions, particularly from NO.” (FEIR, p. II-87.) The FEIR improperly refused to adopt such measures or explain the reasons they would not be adopted. The FEIR incorrectly states the requirement to adopt all feasible mitigation measures “is not a requirement in CEQA.” (FEIR, II-89.)

Additionally, the air quality guidance under which the EIR was prepared is outdated. In February 2015, California’s Office of Environmental Health Hazard Assessment released its final “Air Toxics Hot Spots Program Guidance manual for the Preparation of Risk Assessments (Guidance Manual).” This is available at OEHHA’s website ([http://oehha.ca.gov/air/hot\\_spots/2015/2015GuidanceManual.pdf](http://oehha.ca.gov/air/hot_spots/2015/2015GuidanceManual.pdf).) This new Guidance Manual is different from previous guidance because it includes the use of age-sensitivity factors for estimating cancer risk and changes to the duration of exposure for residents and workers. Therefore, the new assessment methods can demonstrate a substantially higher health risk for residential and other sensitive receptors near emission sources than the previous guidance would have indicated.

Because the new OEHHA methodology includes a number of conservative assumptions about potential impacts to infants and children, short term construction emissions could lead to significant HRA results. For example, SCAQMD staff estimate that a six-month construction project for a typical one-acre office project could cause a significant HRA impact. (SCAQMD Staff presentation, Potential Impacts of New OEHHA Risk Guidelines on SCAQMD Programs, Agenda Item 8b, <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2014/may-specsess-8b.pdf>, p. 9 [“6 months construction impacts from a typical 1-acre office project could cause significant risk • 1 lb/day of DPM for 6 months = risk>10 per million”].)

The Errata asserts the Refined Project is not considered to be a substantial source of Diesel Particulate Matter warranting a Health Risk Assessment, but SCAQMD guidance indicates that it would be.

**10. Floor Area Averaging is Not Allowed for the Project as Proposed.**

One comment letter from Crown Sunset Associates, LLC appropriately stated:

The DEIR also simply takes for granted the averaging of floor area ratio across the entire Project site without actually analyzing the legality or propriety of doing so. The only means by which the Project can purport to legally install three high rise buildings is by scraping off the unused density of the Crossroads of the World site.

(FEIR II-158.) Floor area averaging requires findings set forth in LAMC section 12.24.W.19 including a finding that unified development is proposed. It requires procedures including approval by all persons holding ground leases in the subject property. A covenant must be required to do the following:

- (1) guaranteeing to continue the operation and maintenance of the development as a unified development;
- (2) indicating the floor area and, if applicable, density used on each parcel and the floor area and, if applicable, density potential, if any, that would remain;
- (3) guaranteeing the continued maintenance of the unifying design elements;

These provisions for allowing floor area averaging have not been met.

**Conclusion.**

The Final EIR must be supplemented to address the shortcomings we and others have identified in our objections to the FEIR. While the project has been modified in some ways to address significant impacts, these modifications do not go far enough and, where new development is proposed, can create significant impacts of their own. Once the defects in the EIR are remedied, the Final EIR must be recirculated for adequate public and public agency review and comment. We join in the objections stated in the comments noted above, as well as other objections to the Project.

Thank you for your consideration.

Sincerely,



Douglas P. Carstens

September 10, 2018

City Planning Commission  
City of Los Angeles  
200 N Spring St, Room 532  
Los Angeles, CA 90012

City Planning Commissioners,

We are writing to you regarding the proposed mixed-use development at 6665 W Sunset Blvd (Crossroads Hollywood), including 950 dwelling units of which 105 will be dedicated for Very Low Income households, 190,000 square feet of commercial space, and 308 hotel rooms, cases CPC-2015-2025-DB-MCUP-CU-SPR, VTT-73568-1A, and ENV-2015-2026-EIR. We urge the city to grant the Density Bonus On-Menu Incentives for Parking Option 1, a 35% increase in FAR and FAR averaging across the site, and vehicular access from a less restrictive zone to a more restrictive zone; grant the Density Bonus Off-Menu Incentive for a Waiver of Development Standard to allow 3.8:1 FAR in lieu of 3.26:1; grant the Master Conditional Use Permits (MCUP); approve the Major Development Project Conditional Use Permit (MDPCUP); approve the Site Plan Review; approve the Vesting Tentative Tract Map; certify the Environmental Impact Report (EIR); and adopt the Mitigation Measures and Mitigation Monitoring Program for the project.

The greater Los Angeles region is facing a severe housing shortage. This project will provide much needed housing. By creating new housing in a desirable neighborhood, it will help to reduce issues of gentrification and displacement in other parts of the region. Abundant Housing LA believes that these housing challenges can only be addressed if everyone in the region does their part.

This project is in a great location for housing. It is just two blocks from the Metro Red Line station at Hollywood/Highland, and is directly served by Metro Bus (Route 2/302 on Sunset, Route 237 on Highland) with many additional Metro Bus routes close by on Hollywood (Routes 212/312, 217, and 780). It provides good access to employment centers in Hollywood and good transit access to employment centers in downtown LA, Koreatown, and Universal City. In addition, many desirable neighborhood amenities such as restaurants and retail are in easy walking and bicycling distance.

While a right to remain is not required under city law, we believe it is the right thing to do for this project. We urge the city and the developer to work together with tenant representatives to offer all tenants in existing rent-stabilized units the right to remain. This project has the potential to be an example for how Los Angeles can significantly increase housing supply without displacing any current residents, which would make the city a leader in solving the state's housing issues.

This project is a good project for Los Angeles and for the region. Again, we urge the city to grant the Density Bonus Incentives, grant the MCUP, grant the MDPCUP, approve the Site Plan Review, approve the Vesting Tentative Tract Map, and certify the EIR for this project.

Best Regards,

The Abundant Housing LA Steering Committee:



Matt Dixon  
620 W Wilson Ave, Unit H  
Glendale 91203



Mark Vallianatos  
3591 Canada St  
Los Angeles 90065



Brent Gaisford  
Downtown LA resident, CD 14  
Los Angeles 90013



Leonora Yetter  
1013 16<sup>th</sup> St, Unit 102  
Santa Monica 90403



Mark Edwards  
1174 N Curson Ave, #8  
West Hollywood 90046



Gabe Rose



Chelsea Byers



Benton Heimsath



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Leonora Yetter** <leonorasc@everyactioncustom.com>

Mon, Sep 10, 2018 at 1:36 PM

Reply-To: leonorasc@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

I urge the city to grant the Density Bonus On-Menu Incentives for Parking Option 1, a 35% increase in FAR and FAR averaging across the site, and vehicular access from a less restrictive zone to a more restrictive zone; grant the Density Bonus Off-Menu Incentive for a Waiver of Development Standard to allow 3.8:1 FAR in lieu of 3.26:1; grant the Master Conditional Use Permits (MCUP); approve the Major Development Project Conditional Use Permit (MDPCUP); approve the Site Plan Review; approve the Vesting Tentative Tract Map; certify the Environmental Impact Report (EIR); and adopt the Mitigation Measures and Mitigation Monitoring Program for the project.

While a right to return is not required under city law, I believe it is the right thing to do for this project.

The greater Los Angeles region is facing a severe housing shortage. This project will provide much needed housing—including 105 units of dedicated affordable housing for very low income households and approximately 190,000 square feet of commercial uses.

This project is in a great location for housing and is well-served by public transit including both bus and rail service. The project site is in the immediate vicinity of the Metro Red Line and is directly served by Metro Bus (Routes 2 & 302 on Sunset Blvd). Many additional Metro Bus routes are close by on Highland Ave. (Routes 156 & 656), Fountain Ave (Route 175), and Hollywood Blvd (Routes 180/181, 217, 222, 780). Additionally, the DASH Hollywood bus route serves the site.

This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by Leonora Yetter using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Leonora Yetter  
Santa Monica, CA 90403  
[leonorasc@gmail.com](mailto:leonorasc@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Anna Larmie** <amday05@everyactioncustom.com>

Tue, Sep 11, 2018 at 3:14 AM

Reply-To: amday05@yahoo.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

I urge the city to grant the Density Bonus On-Menu Incentives for Parking Option 1, a 35% increase in FAR and FAR averaging across the site, and vehicular access from a less restrictive zone to a more restrictive zone; grant the Density Bonus Off-Menu Incentive for a Waiver of Development Standard to allow 3.8:1 FAR in lieu of 3.26:1; grant the Master Conditional Use Permits (MCUP); approve the Major Development Project Conditional Use Permit (MDPCUP); approve the Site Plan Review; approve the Vesting Tentative Tract Map; certify the Environmental Impact Report (EIR); and adopt the Mitigation Measures and Mitigation Monitoring Program for the project.

While a right to return is not required under city law, I believe it is the right thing to do for this project.

The greater Los Angeles region is facing a severe housing shortage. This project will provide much needed housing—including 105 units of dedicated affordable housing for very low income households and approximately 190,000 square feet of commercial uses.

This project is in a great location for housing and is well-served by public transit including both bus and rail service. The project site is in the immediate vicinity of the Metro Red Line and is directly served by Metro Bus (Routes 2 & 302 on Sunset Blvd). Many additional Metro Bus routes are close by on Highland Ave. (Routes 156 & 656), Fountain Ave (Route 175), and Hollywood Blvd (Routes 180/181, 217, 222, 780). Additionally, the DASH Hollywood bus route serves the site.

This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by Anna Larmie using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Anna Larmie  
Los Angeles, CA 90034  
[amday05@yahoo.com](mailto:amday05@yahoo.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

**Alex Chen** <aznyellojersey@everyactioncustom.com>

Mon, Sep 10, 2018 at 9:42 PM

Reply-To: aznyellojersey@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

I urge the city to grant the Density Bonus On-Menu Incentives for Parking Option 1, a 35% increase in FAR and FAR averaging across the site, and vehicular access from a less restrictive zone to a more restrictive zone; grant the Density Bonus Off-Menu Incentive for a Waiver of Development Standard to allow 3.8:1 FAR in lieu of 3.26:1; grant the Master Conditional Use Permits (MCUP); approve the Major Development Project Conditional Use Permit (MDPCUP); approve the Site Plan Review; approve the Vesting Tentative Tract Map; certify the Environmental Impact Report (EIR); and adopt the Mitigation Measures and Mitigation Monitoring Program for the project.

While a right to return is not required under city law, I believe it is the right thing to do for this project.

The greater Los Angeles region is facing a severe housing shortage. This project will provide much needed housing—including 105 units of dedicated affordable housing for very low income households and approximately 190,000 square feet of commercial uses.

This project is in a great location for housing and is well-served by public transit including both bus and rail service. The project site is in the immediate vicinity of the Metro Red Line and is directly served by Metro Bus (Routes 2 & 302 on Sunset Blvd). Many additional Metro Bus routes are close by on Highland Ave. (Routes 156 & 656), Fountain Ave (Route 175), and Hollywood Blvd (Routes 180/181, 217, 222, 780). Additionally, the DASH Hollywood bus route serves the site.

This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by Alex Chen using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Alex Chen  
Los Angeles, CA 90012  
[aznyellojersey@gmail.com](mailto:aznyellojersey@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Partho Kalyani** <parthokalyani@everyactioncustom.com>

Mon, Sep 10, 2018 at 9:24 PM

Reply-To: parthokalyani@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

I urge the city to grant the Density Bonus On-Menu Incentives for Parking Option 1, a 35% increase in FAR and FAR averaging across the site, and vehicular access from a less restrictive zone to a more restrictive zone; grant the Density Bonus Off-Menu Incentive for a Waiver of Development Standard to allow 3.8:1 FAR in lieu of 3.26:1; grant the Master Conditional Use Permits (MCUP); approve the Major Development Project Conditional Use Permit (MDPCUP); approve the Site Plan Review; approve the Vesting Tentative Tract Map; certify the Environmental Impact Report (EIR); and adopt the Mitigation Measures and Mitigation Monitoring Program for the project.

While a right to return is not required under city law, I believe it is the right thing to do for this project.

The greater Los Angeles region is facing a severe housing shortage. This project will provide much needed housing—including 105 units of dedicated affordable housing for very low income households and approximately 190,000 square feet of commercial uses.

This project is in a great location for housing and is well-served by public transit including both bus and rail service. The project site is in the immediate vicinity of the Metro Red Line and is directly served by Metro Bus (Routes 2 & 302 on Sunset Blvd). Many additional Metro Bus routes are close by on Highland Ave. (Routes 156 & 656), Fountain Ave (Route 175), and Hollywood Blvd (Routes 180/181, 217, 222, 780). Additionally, the DASH Hollywood bus route serves the site.

This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by Partho Kalyani using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Partho Kalyani  
Los Angeles, CA 90025  
[parthokalyani@gmail.com](mailto:parthokalyani@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Lauren Puntillo** <laurenhmoore@everyactioncustom.com>

Mon, Sep 10, 2018 at 9:18 PM

Reply-To: laurenhmoore@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

I urge the city to grant the Density Bonus On-Menu Incentives for Parking Option 1, a 35% increase in FAR and FAR averaging across the site, and vehicular access from a less restrictive zone to a more restrictive zone; grant the Density Bonus Off-Menu Incentive for a Waiver of Development Standard to allow 3.8:1 FAR in lieu of 3.26:1; grant the Master Conditional Use Permits (MCUP); approve the Major Development Project Conditional Use Permit (MDPCUP); approve the Site Plan Review; approve the Vesting Tentative Tract Map; certify the Environmental Impact Report (EIR); and adopt the Mitigation Measures and Mitigation Monitoring Program for the project.

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This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by Lauren Puntillo using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Lauren Puntillo  
West Hollywood, CA 90048  
[laurenhmoore@gmail.com](mailto:laurenhmoore@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**racquel madrid** <racquelmadrid@everyactioncustom.com>

Mon, Sep 10, 2018 at 8:47 PM

Reply-To: racquelmadrid@yahoo.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by racquel madrid using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
racquel madrid  
Los Angeles, CA 90027  
[racquelmadrid@yahoo.com](mailto:racquelmadrid@yahoo.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Gary Benjamin** <gary.ray.benjamin@everyactioncustom.com>

Mon, Sep 10, 2018 at 8:40 PM

Reply-To: gary.ray.benjamin@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

I urge the city to grant the Density Bonus On-Menu Incentives for Parking Option 1, a 35% increase in FAR and FAR averaging across the site, and vehicular access from a less restrictive zone to a more restrictive zone; grant the Density Bonus Off-Menu Incentive for a Waiver of Development Standard to allow 3.8:1 FAR in lieu of 3.26:1; grant the Master Conditional Use Permits (MCUP); approve the Major Development Project Conditional Use Permit (MDPCUP); approve the Site Plan Review; approve the Vesting Tentative Tract Map; certify the Environmental Impact Report (EIR); and adopt the Mitigation Measures and Mitigation Monitoring Program for the project.

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This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by Gary Benjamin using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Gary Benjamin  
Los Angeles, CA 90026  
[gary.ray.benjamin@gmail.com](mailto:gary.ray.benjamin@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Yurhe Lim** <yurhelee@everyactioncustom.com>

Mon, Sep 10, 2018 at 8:02 PM

Reply-To: yurhelee@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

I urge the city to grant the Density Bonus On-Menu Incentives for Parking Option 1, a 35% increase in FAR and FAR averaging across the site, and vehicular access from a less restrictive zone to a more restrictive zone; grant the Density Bonus Off-Menu Incentive for a Waiver of Development Standard to allow 3.8:1 FAR in lieu of 3.26:1; grant the Master Conditional Use Permits (MCUP); approve the Major Development Project Conditional Use Permit (MDPCUP); approve the Site Plan Review; approve the Vesting Tentative Tract Map; certify the Environmental Impact Report (EIR); and adopt the Mitigation Measures and Mitigation Monitoring Program for the project.

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This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by Yurhe Lim using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Yurhe Lim  
Los Angeles, CA 90015  
[yurhelee@gmail.com](mailto:yurhelee@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Matthew Ruscigno** <mattruscigno@everyactioncustom.com>

Mon, Sep 10, 2018 at 7:57 PM

Reply-To: mattruscigno@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

I urge the city to grant the Density Bonus On-Menu Incentives for Parking Option 1, a 35% increase in FAR and FAR averaging across the site, and vehicular access from a less restrictive zone to a more restrictive zone; grant the Density Bonus Off-Menu Incentive for a Waiver of Development Standard to allow 3.8:1 FAR in lieu of 3.26:1; grant the Master Conditional Use Permits (MCUP); approve the Major Development Project Conditional Use Permit (MDPCUP); approve the Site Plan Review; approve the Vesting Tentative Tract Map; certify the Environmental Impact Report (EIR); and adopt the Mitigation Measures and Mitigation Monitoring Program for the project.

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This project is in a great location for housing and is well-served by public transit including both bus and rail service. The project site is in the immediate vicinity of the Metro Red Line and is directly served by several Metro bus routes and the DASH. Therefore this project should qualify for a significant reduction in parking spots. Because of induced demand, more parking = more driving. That conflicts with LA's plan to mitigate global warming.

This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by Matthew Ruscigno using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Matthew Ruscigno  
Los Angeles, CA 90028  
[mattruscigno@gmail.com](mailto:mattruscigno@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Tracy Green** <postcaselaw@everyactioncustom.com>

Mon, Sep 10, 2018 at 7:32 PM

Reply-To: postcaselaw@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use ALL AFFORDABLE HOUSING APARTMENT UNITS development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

I urge the city to grant the Density Bonus On-Menu Incentives for Parking Option 1, a 35% increase in FAR and FAR averaging across the site, and vehicular access from a less restrictive zone to a more restrictive zone; grant the Density Bonus Off-Menu Incentive for a Waiver of Development Standard to allow 3.8:1 FAR in lieu of 3.26:1; grant the Master Conditional Use Permits (MCUP); approve the Major Development Project Conditional Use Permit (MDPCUP); approve the Site Plan Review; approve the Vesting Tentative Tract Map; certify the Environmental Impact Report (EIR); and adopt the Mitigation Measures and Mitigation Monitoring Program for the project.

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This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by Tracy Green using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Tracy Green  
Los Angeles, CA 90027  
[postcaselaw@gmail.com](mailto:postcaselaw@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Terence Heuston** <terenceheuston@everyactioncustom.com>

Mon, Sep 10, 2018 at 5:47 PM

Reply-To: terenceheuston@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by Terence Heuston using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Terence Heuston  
Los Angeles, CA 90026  
[terenceheuston@gmail.com](mailto:terenceheuston@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Krystof Litomisky** <krystof.litomisky@everyactioncustom.com>

Mon, Sep 10, 2018 at 5:39 PM

Reply-To: krystof.litomisky@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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Personally sent by Krystof Litomisky using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Krystof Litomisky  
La Crescenta, CA 91214  
[krystof.litomisky@gmail.com](mailto:krystof.litomisky@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Krystof Litomisky** <krystof.litomisky@everyactioncustom.com>

Mon, Sep 10, 2018 at 5:39 PM

Reply-To: krystof.litomisky@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

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Personally sent by Krystof Litomisky using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Krystof Litomisky  
La Crescenta, CA 91214  
[krystof.litomisky@gmail.com](mailto:krystof.litomisky@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Joana Richardson** <joanas2die4@everyactioncustom.com>

Mon, Sep 10, 2018 at 3:29 PM

Reply-To: joanas2die4@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by Joana Richardson using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Joana Richardson  
Los Angeles, CA 90013  
[joanas2die4@gmail.com](mailto:joanas2die4@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Alec Mitchell** <alecpm@everyactioncustom.com>

Mon, Sep 10, 2018 at 3:28 PM

Reply-To: alecpm@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by Alec Mitchell using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Alec Mitchell  
Los Angeles, CA 90012  
[alecpm@gmail.com](mailto:alecpm@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Richard Bourne** <rpbourne@everyactioncustom.com>

Mon, Sep 10, 2018 at 3:27 PM

Reply-To: rpbourne@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

I urge the city to grant the Density Bonus On-Menu Incentives for Parking Option 1, a 35% increase in FAR and FAR averaging across the site, and vehicular access from a less restrictive zone to a more restrictive zone; grant the Density Bonus Off-Menu Incentive for a Waiver of Development Standard to allow 3.8:1 FAR in lieu of 3.26:1; grant the Master Conditional Use Permits (MCUP); approve the Major Development Project Conditional Use Permit (MDPCUP); approve the Site Plan Review; approve the Vesting Tentative Tract Map; certify the Environmental Impact Report (EIR); and adopt the Mitigation Measures and Mitigation Monitoring Program for the project.

The greater Los Angeles region is facing a severe housing shortage. This project will provide much needed housing—including 105 units of dedicated affordable housing for very low income households and approximately 190,000 square feet of commercial uses.

The site is well served by buses and the Red Line subway. If anything I would like to have seen more units and less parking, but as is it is better than the blight that is currently there.

This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Sincerely,  
Richard Bourne  
Los Angeles, CA 90020  
[rpbourne@gmail.com](mailto:rpbourne@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**GREGORY DINA** <gregdina@everyactioncustom.com>

Mon, Sep 10, 2018 at 3:26 PM

Reply-To: gregdina@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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While a right to return is not required under city law, I believe it is the right thing to do for this project.

The greater Los Angeles region is facing a severe housing shortage. This project will provide much needed housing—including 105 units of dedicated affordable housing for very low income households and approximately 190,000 square feet of commercial uses.

This project is in a great location for housing and is well-served by public transit including both bus and rail service. The project site is in the immediate vicinity of the Metro Red Line and is directly served by Metro Bus (Routes 2 & 302 on Sunset Blvd). Many additional Metro Bus routes are close by on Highland Ave. (Routes 156 & 656), Fountain Ave (Route 175), and Hollywood Blvd (Routes 180/181, 217, 222, 780). Additionally, the DASH Hollywood bus route serves the site.

This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by GREGORY DINA using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
GREGORY DINA  
Los Angeles, CA 90045  
[gregdina@gmail.com](mailto:gregdina@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**John Means** <johnny.means1@everyactioncustom.com>

Mon, Sep 10, 2018 at 3:20 PM

Reply-To: johnny.means1@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by John Means using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
John Means  
Los Angeles, CA 90012  
[johnny.means1@gmail.com](mailto:johnny.means1@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Sean Youssefi** <sean.youssefi@everyactioncustom.com>

Mon, Sep 10, 2018 at 3:18 PM

Reply-To: sean.youssefi@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by Sean Youssefi using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Sean Youssefi  
Santa Monica, CA 90404  
[sean.youssefi@gmail.com](mailto:sean.youssefi@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Kyle Jenkins** <krljenkins@everyactioncustom.com>

Mon, Sep 10, 2018 at 3:16 PM

Reply-To: krljenkins@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by Kyle Jenkins using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Kyle Jenkins  
Los Angeles, CA 90049  
[krljenkins@gmail.com](mailto:krljenkins@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Jessica Brennan** <jsscbrennan@everyactioncustom.com>

Mon, Sep 10, 2018 at 3:13 PM

Reply-To: jsscbrennan@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by Jessica Brennan using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Jessica Brennan  
Los Angeles, CA 90031  
[jsscbrennan@gmail.com](mailto:jsscbrennan@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Joshua Blumenkopf** <jblumenkopf@everyactioncustom.com>

Mon, Sep 10, 2018 at 3:03 PM

Reply-To: jblumenkopf@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by Joshua Blumenkopf using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Joshua Blumenkopf  
Pasadena, CA 91101  
[jblumenkopf@gmail.com](mailto:jblumenkopf@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Joshua Gray-Emmer** <dtlajosh@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:59 PM

Reply-To: dtlajosh@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by Joshua Gray-Emmer using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Joshua Gray-Emmer  
Los Angeles, CA 90013  
[dtlajosh@gmail.com](mailto:dtlajosh@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**norma guzman** <normaguz@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:57 PM

Reply-To: normaguz@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by norma guzman using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
norma guzman  
Seattle, WA 98122  
[normaguz@gmail.com](mailto:normaguz@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Eddie Isaacs** <isaacs\_e@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:53 PM

Reply-To: isaacs\_e@yahoo.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by Eddie Isaacs using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Eddie Isaacs  
Los Angeles, CA 90012  
[isaacs\\_e@yahoo.com](mailto:isaacs_e@yahoo.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Babak Mozaffari** <bm@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:51 PM

Reply-To: bm@contactbm.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by Babak Mozaffari using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Babak Mozaffari  
Santa Monica, CA 90401  
[bm@contactbm.com](mailto:bm@contactbm.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Liz Barillas** <trunkschan90@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:51 PM

Reply-To: trunkschan90@yahoo.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Sincerely,  
Liz Barillas  
Glendale, CA 91201  
[trunkschan90@yahoo.com](mailto:trunkschan90@yahoo.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Ariel Simons** <levisimons@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:45 PM

Reply-To: levisimons@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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Personally sent by Ariel Simons using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Ariel Simons  
Los Angeles, CA 90020  
[levisimons@gmail.com](mailto:levisimons@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Casey Kovarik** <caseykovarik@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:36 PM

Reply-To: caseykovarik@ucla.edu

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

I urge the city to grant the Density Bonus On-Menu Incentives for Parking Option 1, a 35% increase in FAR and FAR averaging across the site, and vehicular access from a less restrictive zone to a more restrictive zone; grant the Density Bonus Off-Menu Incentive for a Waiver of Development Standard to allow 3.8:1 FAR in lieu of 3.26:1; grant the Master Conditional Use Permits (MCUP); approve the Major Development Project Conditional Use Permit (MDPCUP); approve the Site Plan Review; approve the Vesting Tentative Tract Map; certify the Environmental Impact Report (EIR); and adopt the Mitigation Measures and Mitigation Monitoring Program for the project.

While a right to return is not required under city law, I believe it is the right thing to do for this project.

The greater Los Angeles region is facing a severe housing shortage. This project will provide much needed housing—including 105 units of dedicated affordable housing for very low income households and approximately 190,000 square feet of commercial uses.

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Personally sent by Casey Kovarik using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Casey Kovarik  
Los Angeles, CA 90034  
[caseykovarik@ucla.edu](mailto:caseykovarik@ucla.edu)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Virginia Postrel** <vp@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:35 PM

Reply-To: vp@vpostrel.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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Personally sent by Virginia Postrel using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Virginia Postrel  
Los Angeles, CA 90025  
[vp@vpostrel.com](mailto:vp@vpostrel.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Nicholas Burns III** <nkburns3@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:34 PM

Reply-To: nkburns3@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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Personally sent by Nicholas Burns III using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Nicholas Burns III  
Los Angeles, CA 90025  
[nkburns3@gmail.com](mailto:nkburns3@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Ryan Tanaka Tanaka** <ryangtanaka@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:31 PM

Reply-To: ryangtanaka@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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Personally sent by Ryan Tanaka Tanaka using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Ryan Tanaka Tanaka  
Los Angeles, CA 90013  
[ryangtanaka@gmail.com](mailto:ryangtanaka@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Amy Ruth Vreeman** <BarefootRagamuffin@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:30 PM

Reply-To: BarefootRagamuffin@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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Personally sent by Amy Ruth Vreeman using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,

Amy Ruth Vreeman

Burbank, CA 91502

[BarefootRagamuffin@gmail.com](mailto:BarefootRagamuffin@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Michael Walzman** <mwalzman9@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:27 PM

Reply-To: mwalzman9@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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Personally sent by Michael Walzman using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Michael Walzman  
Los Angeles, CA 90027  
[mwalzman9@gmail.com](mailto:mwalzman9@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**George Papanikolas** <georgepapanikolas@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:23 PM

Reply-To: georgepapanikolas@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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Personally sent by George Papanikolas using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
George Papanikolas  
Los Angeles, CA 90046  
[georgepapanikolas@gmail.com](mailto:georgepapanikolas@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Mark Montiel** <mrkmontiel@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:22 PM

Reply-To: mrkmontiel@yahoo.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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Personally sent by Mark Montiel using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Mark Montiel  
Los Angeles, CA 90014  
[mrkmontiel@yahoo.com](mailto:mrkmontiel@yahoo.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

**Andy Freeland** <andy@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:20 PM

Reply-To: andy@andyfreeland.net

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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Personally sent by Andy Freeland using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Andy Freeland  
Los Angeles, CA 90015  
[andy@andyfreeland.net](mailto:andy@andyfreeland.net)



James Williams <james.k.williams@lacity.org>

---

## Support for the proposed Crossroads Hollywood development

1 message

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**Stanley Johnson** <stjohnso@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:18 PM

Reply-To: stjohnso@aerotek.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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Personally sent by Stanley Johnson using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Stanley Johnson  
Los Angeles, CA 90016  
[stjohnso@aerotek.com](mailto:stjohnso@aerotek.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Marvin Bojorquez** <nofxdude55@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:18 PM

Reply-To: nofxdude55@sbcglobal.net

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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Personally sent by Marvin Bojorquez using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Marvin Bojorquez  
Los Angeles, CA 90062  
[nofxdude55@sbcglobal.net](mailto:nofxdude55@sbcglobal.net)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

**Angus Beverly** <angusbeverly@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:17 PM

Reply-To: angusbeverly@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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Personally sent by Angus Beverly using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Angus Beverly  
Los Angeles, CA 90024  
[angusbeverly@gmail.com](mailto:angusbeverly@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Ryan Koyanagi** <ryank.pf@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:14 PM

Reply-To: ryank.pf@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

I urge the city to grant the Density Bonus On-Menu Incentives for Parking Option 1, a 35% increase in FAR and FAR averaging across the site, and vehicular access from a less restrictive zone to a more restrictive zone; grant the Density Bonus Off-Menu Incentive for a Waiver of Development Standard to allow 3.8:1 FAR in lieu of 3.26:1; grant the Master Conditional Use Permits (MCUP); approve the Major Development Project Conditional Use Permit (MDPCUP); approve the Site Plan Review; approve the Vesting Tentative Tract Map; certify the Environmental Impact Report (EIR); and adopt the Mitigation Measures and Mitigation Monitoring Program for the project.

While a right to return is not required under city law, I believe it is the right thing to do for this project.

The greater Los Angeles region is facing a severe housing shortage. This project will provide much needed housing—including 105 units of dedicated affordable housing for very low income households and approximately 190,000 square feet of commercial uses.

This project is in a great location for housing and is well-served by public transit including both bus and rail service. The project site is in the immediate vicinity of the Metro Red Line and is directly served by Metro Bus (Routes 2 & 302 on Sunset Blvd). Many additional Metro Bus routes are close by on Highland Ave. (Routes 156 & 656), Fountain Ave (Route 175), and Hollywood Blvd (Routes 180/181, 217, 222, 780). Additionally, the DASH Hollywood bus route serves the site.

This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by Ryan Koyanagi using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Ryan Koyanagi  
Pomona, CA 91766  
[ryank.pf@gmail.com](mailto:ryank.pf@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Judd Schoenholtz** <judd@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:13 PM

Reply-To: judd@openlistings.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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Personally sent by Judd Schoenholtz using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Judd Schoenholtz  
Los Angeles, CA 90039  
[judd@openlistings.com](mailto:judd@openlistings.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Lauren Borchard** <laurenborchard@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:10 PM

Reply-To: laurenborchard@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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Personally sent by Lauren Borchard using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Lauren Borchard  
Los Angeles, CA 90036  
[laurenborchard@gmail.com](mailto:laurenborchard@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Rich Vu** <vuongr@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:09 PM

Reply-To: vuongr@usc.edu

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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Personally sent by Rich Vu using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Rich Vu  
Los Angeles, CA 90007  
[vuongr@usc.edu](mailto:vuongr@usc.edu)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Luke Klipp** <lukehklipp@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:09 PM

Reply-To: lukehklipp@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

HERE'S THE THING: I love the existing Crossroads of the World property. I'm one of the few people who's actually been able to walk around this special place and experience what once was a really cool vision, and what could be a really cool vision again. There are all sorts of reasons that the proposed Crossroads Hollywood project are good for our region, certainly not least of which is creating 950 more homes, of which over 100 would be designated affordable. And, I want to take a moment to acknowledge the opportunity for a project that would make the existing Crossroads space so much more engaging and inviting and open to the public. This is important, especially in a community where most of our open space is covered in asphalt and striped for parking.

Therefore, I urge the city to grant the Density Bonus On-Menu Incentives for Parking Option 1, a 35% increase in FAR and FAR averaging across the site, and vehicular access from a less restrictive zone to a more restrictive zone; grant the Density Bonus Off-Menu Incentive for a Waiver of Development Standard to allow 3.8:1 FAR in lieu of 3.26:1; grant the Master Conditional Use Permits (MCUP); approve the Major Development Project Conditional Use Permit (MDPCUP); approve the Site Plan Review; approve the Vesting Tentative Tract Map; certify the Environmental Impact Report (EIR); and adopt the Mitigation Measures and Mitigation Monitoring Program for the project.

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This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by Luke Klipp using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Luke Klipp  
Los Angeles, CA 90027  
[lukehklipp@gmail.com](mailto:lukehklipp@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Mackenzie Goldberg** <mackgold72@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:08 PM

Reply-To: mackgold72@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

I urge the city to grant the Density Bonus On-Menu Incentives for Parking Option 1, a 35% increase in FAR and FAR averaging across the site, and vehicular access from a less restrictive zone to a more restrictive zone; grant the Density Bonus Off-Menu Incentive for a Waiver of Development Standard to allow 3.8:1 FAR in lieu of 3.26:1; grant the Master Conditional Use Permits (MCUP); approve the Major Development Project Conditional Use Permit (MDPCUP); approve the Site Plan Review; approve the Vesting Tentative Tract Map; certify the Environmental Impact Report (EIR); and adopt the Mitigation Measures and Mitigation Monitoring Program for the project.

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This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by Mackenzie Goldberg using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Mackenzie Goldberg  
Los Angeles, CA 90018  
[mackgold72@gmail.com](mailto:mackgold72@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Ethan Stanislawski** <ethan@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:05 PM

Reply-To: ethan@ethanstanislawski.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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Personally sent by Ethan Stanislawski using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Ethan Stanislawski  
Los Angeles, CA 90068  
[ethan@ethanstanislawski.com](mailto:ethan@ethanstanislawski.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Chelsea Byers** <chels.byers@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:04 PM

Reply-To: chels.byers@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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Personally sent by Chelsea Byers using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Chelsea Byers  
Culver City, CA 90230  
[chels.byers@gmail.com](mailto:chels.byers@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

**Babak Mozaffari** <bm@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:03 PM

Reply-To: bm@contactbm.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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Personally sent by Babak Mozaffari using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Babak Mozaffari  
Santa Monica, CA 90401  
[bm@contactbm.com](mailto:bm@contactbm.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

**Holly Gressley** <hollygressley@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:02 PM

Reply-To: hollygressley@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

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Personally sent by Holly Gressley using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Holly Gressley  
Los Angeles, CA 90027  
[hollygressley@gmail.com](mailto:hollygressley@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Alexander Volberding** <avolberding@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:02 PM

Reply-To: avolberding@gmail.com

To: cpc@lacity.org

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Personally sent by Alexander Volberding using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Alexander Volberding  
Los Angeles, CA 90025  
[avolberding@gmail.com](mailto:avolberding@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

## Support for the proposed Crossroads Hollywood development

2 messages

**Alexander Volberding** <avolberding@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:02 PM

Reply-To: avolberding@gmail.com

To: cpc@lacity.org

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Sincerely,  
Alexander Volberding  
Los Angeles, CA 90025  
[avolberding@gmail.com](mailto:avolberding@gmail.com)

**James Williams** <james.k.williams@lacity.org>

Tue, Sep 11, 2018 at 8:10 AM

To: avolberding@gmail.com

Cc: Cecilia Lamas &lt;cecilia.lamas@lacity.org&gt;, Rocky Wiles &lt;Rocky.Wiles@lacity.org&gt;

Thank you for your submission. Your letter will be shared with the City Planning Commission and the Planning Executive Office.



**James K. Williams**  
**Commission Executive Assistant II**  
**City Planning Commission**  
**Department of City Planning**  
**T: (213) 978-1300**  
200 N. Spring St., Room 272

9/11/2018

City of Los Angeles Mail - Support for the proposed Crossroads Hollywood development

Los Angeles, CA. 90012

[James.K.Williams@lacity.org](mailto:James.K.Williams@lacity.org)

[Quoted text hidden]



James Williams <james.k.williams@lacity.org>

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## Support for the proposed Crossroads Hollywood development

1 message

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**John Graff** <john@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:02 PM

Reply-To: john@ashbygraff.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

I urge the city to grant the Density Bonus On-Menu Incentives for Parking Option 1, a 35% increase in FAR and FAR averaging across the site, and vehicular access from a less restrictive zone to a more restrictive zone; grant the Density Bonus Off-Menu Incentive for a Waiver of Development Standard to allow 3.8:1 FAR in lieu of 3.26:1; grant the Master Conditional Use Permits (MCUP); approve the Major Development Project Conditional Use Permit (MDPCUP); approve the Site Plan Review; approve the Vesting Tentative Tract Map; certify the Environmental Impact Report (EIR); and adopt the Mitigation Measures and Mitigation Monitoring Program for the project.

While a right to return is not required under city law, I believe it is the right thing to do for this project.

The greater Los Angeles region is facing a severe housing shortage. This project will provide much needed housing—including 105 units of dedicated affordable housing for very low income households and approximately 190,000 square feet of commercial uses.

This project is in a great location for housing and is well-served by public transit including both bus and rail service. The project site is in the immediate vicinity of the Metro Red Line and is directly served by Metro Bus (Routes 2 & 302 on Sunset Blvd). Many additional Metro Bus routes are close by on Highland Ave. (Routes 156 & 656), Fountain Ave (Route 175), and Hollywood Blvd (Routes 180/181, 217, 222, 780). Additionally, the DASH Hollywood bus route serves the site.

This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by John Graff.

Sincerely,  
John Graff  
Los Angeles, CA 90038  
[john@ashbygraff.com](mailto:john@ashbygraff.com)



James Williams &lt;james.k.williams@lacity.org&gt;

---

## Support for the proposed Crossroads Hollywood development

1 message

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**Emerson Dameron** <edameron@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:01 PM

Reply-To: edameron@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by Emerson Dameron using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Emerson Dameron  
Los Angeles, CA 90017  
[edameron@gmail.com](mailto:edameron@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

---

## Support for the proposed Crossroads Hollywood development

1 message

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**Prabhu Reddy** <prabhu.r.reddy@everyactioncustom.com>

Tue, Sep 11, 2018 at 8:18 AM

Reply-To: prabhu.r.reddy@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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Personally sent by Prabhu Reddy using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Prabhu Reddy  
Long Beach, CA 90803  
[prabhu.r.reddy@gmail.com](mailto:prabhu.r.reddy@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Daniel Schreiner** <dan000419@everyactioncustom.com>

Tue, Sep 11, 2018 at 7:44 AM

Reply-To: dan000419@aol.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by Daniel Schreiner using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Daniel Schreiner  
Los Angeles, CA 90027  
[dan000419@aol.com](mailto:dan000419@aol.com)



James Williams &lt;james.k.williams@lacity.org&gt;

---

## Support for the proposed Crossroads Hollywood development

3 messages

**Tracy Green** <postcaselaw@everyactioncustom.com>

Mon, Sep 10, 2018 at 7:32 PM

Reply-To: postcaselaw@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use ALL AFFORDABLE HOUSING APARTMENT UNITS development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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This project is a good project for Los Angeles and for the region. Again, I urge the City Planning Commission approve the Project as proposed.

Personally sent by Tracy Green using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Tracy Green  
Los Angeles, CA 90027  
[postcaselaw@gmail.com](mailto:postcaselaw@gmail.com)

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**James Williams** <james.k.williams@lacity.org>

Tue, Sep 11, 2018 at 7:35 AM

To: postcaselaw@gmail.com

Cc: Rocky Wiles &lt;Rocky.Wiles@lacity.org&gt;, Cecilia Lamas &lt;cecilia.lamas@lacity.org&gt;

Thank you for your submission. Your letter will be shared with the City Planning Commission and the Planning Executive Office.



**James K. Williams**  
**Commission Executive Assistant II**  
**City Planning Commission**  
**Department of City Planning**  
**T: (213) 978-1300**

200 N. Spring St., Room 272  
Los Angeles, CA. 90012  
[James.K.Williams@lacity.org](mailto:James.K.Williams@lacity.org)

[Quoted text hidden]

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**Tracy Green** <postcaselaw@gmail.com>  
To: James Williams <james.k.williams@lacity.org>

Tue, Sep 11, 2018 at 8:33 AM

Good Morning Mr. Williams;

All new development buildings need to have, at least, 20% affordable housing to accommodate and supplement our serious major crisis of housing for the chronically poor, disenfranchised population and our homeless populations in Los Angeles and all other counties nationwide.

We must not forget and leave out these crisis populations of people, which are most severely vulnerable and in affordable housing crisis. Theses displaced and crisis must be included automatically in each new development and buildings.

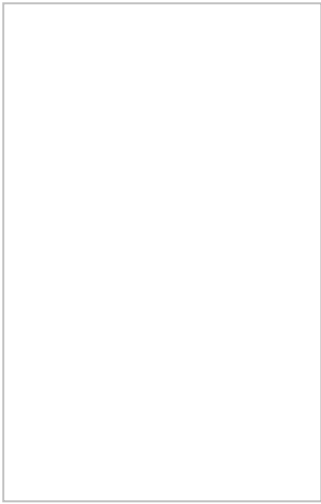
After all, we are our brothers and sisters keeper.

Please keep me abreast of this major situation.

Thank you kindly.

[Quoted text hidden]

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*The Happy you are the more beautiful you become!*

- "Live for the service of others, help out in your community, be totally concerned about your environment, love a lot, live your life to the fullest, your fullest God given potential, laugh a lot, and always be mindful of others. Be blessed and bless others with all of your gifts. Strive to always help others and be happy and healthy." - Tracy Green

*"Do something everyday that scares you" - Eleanor Roosevelt*

*Have a magnificent week!*

*With warmest regards, I am,*

*Sincerely;*

*Ms. Tracy Green*

*Tracy Green and Associates Consultancy*

*Beverly Hills, California*

*Advertising, Litigation Specialists, Marketing Coordinator, Public Relations*

*"The Street Don't Love You Back" Movement Team - West Coast Division-501(c)3*

*Beverly Hills, CA*

***Go Green - Please consider the environment before printing this email***

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James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Arjun Kolachalam** <akolachalam@everyactioncustom.com>

Mon, Sep 10, 2018 at 2:48 PM

Reply-To: [akolachalam@gmail.com](mailto:akolachalam@gmail.com)To: [cpc@lacity.org](mailto:cpc@lacity.org)

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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Personally sent by Arjun Kolachalam using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Arjun Kolachalam  
West Hollywood, CA 90048  
[akolachalam@gmail.com](mailto:akolachalam@gmail.com)



James Williams &lt;james.k.williams@lacity.org&gt;

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## Support for the proposed Crossroads Hollywood development

1 message

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**Alan Wayne** <alan.m.wayne@everyactioncustom.com>

Mon, Sep 10, 2018 at 1:49 PM

Reply-To: alan.m.wayne@gmail.com

To: cpc@lacity.org

Dear Los Angeles City Planning Commission,

I am writing to you to in support of the proposed 950-unit mixed use development on a 8.34-acre site in the Hollywood Community Plan Area, cases CPC-2015-2025-DB-MCUP-CUSPR; VTT-73568; VTT-73568-1A; and ENV-2015-2026-EIR.

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Personally sent by Alan Wayne using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is an all-volunteer grassroots organization committed to advocating for more housing.

Sincerely,  
Alan Wayne  
Venice, CA 90291  
[alan.m.wayne@gmail.com](mailto:alan.m.wayne@gmail.com)

# ADAMS BROADWELL JOSEPH & CARDOZO

A PROFESSIONAL CORPORATION

## ATTORNEYS AT LAW

601 GATEWAY BOULEVARD, SUITE 1000  
SOUTH SAN FRANCISCO, CA 94080-7037

TEL: (650) 589-1660  
FAX: (650) 589-5062

[nlotan@adamsbroadwell.com](mailto:nlotan@adamsbroadwell.com)

## SACRAMENTO OFFICE

520 CAPITOL MALL, SUITE 350  
SACRAMENTO, CA 95814-4721

TEL: (916) 444-6201  
FAX: (916) 444-6209

DANIEL L. CARDOZO  
CHRISTINA M. CARO  
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TANYA A. GULESSERIAN  
MARC D. JOSEPH  
RACHAEL E. KOSS  
MILES F. MAURINO  
COLLIN S. MCCARTHY

LAURA DEL CASTILLO  
*Of Counsel*

September 11, 2018

### **Via Email Only**

### **Agenda Item no. 10**

City Planning Commissioners  
City of Los Angeles  
[cpc@lacity.org](mailto:cpc@lacity.org)

**Re: Response to Department of City Planning Appeal Report regarding the  
Schrader Hotel Project (VTT-74521-1A, ENV-2016-3751-MND)**

Dear Honorable Planning Commissioners:

We write on behalf of the Coalition for Responsible Equitable Economic Development (“CREED LA”), John Ferruccio, Jorge L. Aceves, John P. Bustos, Gerry Kennon, and Chris S. Macias, to respond to the City of Los Angeles (“City”) Department of City Planning Appeal Report (“Appeal Report”) prepared for the September 13, 2018 City Planning Commission hearing regarding the Hotel project located at 1600-1616 ½ North Schrader Boulevard and 6533 West Selma Avenue (“Project”) (VTT-74521-1A, ENV-2016-3751-MND).

On June 7, 2018 we submitted comments on the Project’s MND. On July 18, 2018, we submitted our response to the City’s response to comments. On August 3, 2018, the Advisory Agency filed a letter of determination approving the VTT and the MND and, on August 13, 2018, we submitted our appeal on the Advisory Agency’s decision. The Appeal Report contains responses to some of our appeal arguments. However, the Appeal Report fails to resolve the issues we raised, as detailed below, and our comments still stand.<sup>1</sup> Moreover, the Appeal Report reveals that the MND’s noise analysis is not supported by substantial evidence; instead, it contradicts explicit language in the Advisory Agency Letter of Determination.

In short, the MND still fails to comply with the requirements of the California Environmental Quality Act<sup>2</sup> (“CEQA”) because substantial evidence supports a fair argument that the Project may cause: (1) a significant, unmitigated

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<sup>1</sup> We incorporate our June 7, 2018, July 18, 2018 and August 13, 2018 comments, along with their attachments and exhibit, herein by reference.

<sup>2</sup> Pub. Resources Code §§ 21000 et seq.; 14 Cal. Code Regs. §§ 15000 et seq. (“CEQA Guidelines”).  
4267-011n1

impact on public health from toxic air contaminants (“TACs”), particularly for school-aged children and (2) a significant, unmitigated impact from noise.<sup>3</sup>

**(1) Substantial evidence supports a fair argument that the Project may result in potentially significant impacts on public health, especially for school age children attending the nearby schools.**

In our previous comments, we explained that the City has a duty to assess the impacts the project may have on public health and pointed out to a long line of court rulings establishing that duty.<sup>4</sup> Moreover, SWAPE provided an expert opinion, supported by substantial evidence, that the Project may result in a significant impact on public health.<sup>5</sup> In the Appeal Response, the City repeats its claim it has no duty to perform a health risk assessment.<sup>6</sup> The City, however, does acknowledge some impacts the project may have on the nearby school children and added two supplementary safety-related mitigation measures accordingly.<sup>7</sup>

SWAPE conducted a supplemental health risk assessment to evaluate the health risk posed to those school children attending the Selma Avenue Elementary School and the Blessed Sacrament School located near the Project site, which have not been addressed or evaluated in any report or analysis prepared for the Project. SWAPE’s modeling and assumptions are detailed in their letter.<sup>8</sup> SWAPE’s analysis found that *the excess cancer risk to a school child from ages five to fourteen years old is approximately 850 in one million*, which greatly exceeds the SCAQMD’s threshold of ten in one million.<sup>9</sup> The City must therefore prepare an EIR to analyze and mitigate this potentially significant public health impact, as required by law.

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<sup>3</sup> We reviewed the City’s analysis and responses with the assistance of air quality and hazards experts Matt Hagemann and Hadley Nolan of Soil/Water/Air Protection Enterprise (“SWAPE”) and of acoustic expert Neil Shaw, FASA, FAES of Menlo Scientific Acoustic, Inc. SWAPE’s and Mr. Shaw’s comments are attached hereto as Exhibit A and Exhibit B, respectively, and are fully incorporated herein and submitted to the City herewith.

<sup>4</sup> CREED L.A., Schrader Hotel Project Mitigated Negative Declaration, July 18, 2018.

<sup>5</sup> SWAPE, Comments on the Schrader Hotel Project, June 7, 2018.

<sup>6</sup> Appeal Report, p. A-7.

<sup>7</sup> Appeal Report, p. A-2.

<sup>8</sup> See Exhibit A: SWAPE’s comments, September 10, 2018.

<sup>9</sup> See Exhibit A: SWAPE’s comments, September 10, 2018, p. 4.

**(2) Substantial evidence supports a fair argument that the Project may result in potentially significant impacts from noise.**

The MND's noise impacts analysis relies heavily on the application of "Project Design Feature" number 2 (PDF-2), a digital audio processor (DAP) which is supposed to limit the noise level from the 11<sup>th</sup> floor rooftop deck to no more than 84 dBA.<sup>10</sup> The Noise Appendix calculations therefore assume noise levels at the 11<sup>th</sup> floor do not exceed 84.32 dBA.<sup>11</sup> The Appeal Report, however, states: "Moreover, PDF-4 includes specific measures that would be implemented in the event external audio equipment produces noise levels that exceed the identified threshold levels."<sup>12</sup> *This statement means that outside audio equipment that is not controlled by the mitigation measure will be allowed and used on the 11<sup>th</sup> floor rooftop.* There are several problems with this statement:

First, it contradicts previous statements by the City. In its August 2, 2018 response to comments, the City argued the system described in PDF-2 "would apply to all amplified sound within the proposed hotel and outdoor area" and that "[e]ntertainers would be prohibited from bringing in outside equipment that bypasses the hotel's audio system control."<sup>13</sup> The City failed to point to any language indicating such prohibition, and it is clear no such prohibition exists.

More importantly, the staff response means the MND's noise analysis is wholly unsupported. As explained above, the Noise Appendix calculation are all based on the assumption of a baseline level of 84.32 dBA, since all output sound is supposed to be controlled by the DAP. Because outside equipment, not controlled by the DAP, will be allowed on the rooftop, noise levels will in fact be much higher – the MND itself indicates levels of 104 dBA.<sup>14</sup> There is therefore no support for the noise analysis' reliance on 84 dBA noise levels, and an EIR must be prepared to account for potentially significant impacts from the correct noise levels.

Moreover, in and of itself, the staff response is not supported by substantial evidence, as it relies on a "design feature" that cannot actually mitigate the impacts.

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<sup>10</sup> MND, p. II-41

<sup>11</sup> Exhibit 1: Neil Shaw comments, September 7, p. 1. To these levels, the MND adds further reductions from distance and from the glass barrier.

<sup>12</sup> Appeal Report, p. A-8.

<sup>13</sup> City of Los Angeles, Schrader Hotel Project Responses to Comments, August 2, 2018, p. 45.

<sup>14</sup> MND, p. III-106.

4267-011n1

September 10, 2018

Page 4

PDF-4 refers to rules on the hours of operations, requires closing the doors of the dining area when live entertainment/amplified music is being played, and requires closing doors and windows in response to complaints. Nothing in this design feature can mitigate the significant noise impacts created by outside equipment and acoustic instruments.<sup>15</sup>

The Appeal Report also fails to respond to other flaws detailed in the appellants' previous letter. One, the glass barrier will not mitigate low-frequency noise.<sup>16</sup> Two, the complaint system is not a proper mitigation measure because it is unenforceable; specifically, it is only reactive and not pro-active and the system hours do not even coincide with the rooftop operation hours.<sup>17</sup>

All the above-mentioned flaws further emphasize the other major flaw in the City's analysis – the fact that it compressed the analysis of impacts and mitigation measures and relied on design features for mitigation without disclosing the Project's impacts, in violation of CEQA. The Appeal Report merely argues in response that the digital audio processor is not a mitigation measure.<sup>18</sup> However, the fact is that the City's analysis "obfuscates required disclosure of the project's environmental impacts and analysis of potential mitigation measures."<sup>19</sup>

The City must prepare an EIR to analyze and mitigate the Project's potentially significant impacts.

Sincerely,

/s/

Tanya A. Gulesserian  
Nirit Lotan

:nl

CC: [jason.hernandez@lacity.org](mailto:jason.hernandez@lacity.org); [Mindy.Nguyen@lacity.org](mailto:Mindy.Nguyen@lacity.org)

---

<sup>15</sup> Exhibit 1: Neil Shaw comments, September 7, p. 1. See also CREED L.A. Appeal, August 13, 2018.

<sup>16</sup> Exhibit 1: Neil Shaw comments, September 7, See also previous Shaw comments. Moreover, nothing in the MND prevents live music from being played outside the enclosed dining area, rendering the complaint system useless.

<sup>17</sup> According to the MMP, PDF-4.g. requires closing the doors and windows of the penthouse in response to complaints between 7 am and 12 am, but operation hours of the penthouse are up until 2 am, and only the doors must be closed past 12 am, but not the windows.

<sup>18</sup> Appeal Report, p. A-8.

<sup>19</sup> *Mission Bay All. v. Office of Cmty. Inv. & Infrastructure*, 6 Cal. App. 5th 160, 185, 211.

4267-011nl



Technical Consultation, Data Analysis and  
Litigation Support for the Environment

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September 10, 2018

Nirit Lotan  
Adams Broadwell Joseph & Cardozo  
601 Gateway Boulevard, Suite 1000  
South San Francisco, CA 94080

**Subject: Response to Comments on the Schrader Hotel Project**

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Dear Ms. Lotan,

We have reviewed the September 2018 Department of City Planning Appeal Report ("Appeal") and associated attachments, which addressed comments we made in a July 17, 2018 comment letter on the July 2018 Staff Report ("Staff Report") prepared for the Schrader Hotel Project ("Project") located in the City of Los Angeles ("City"). The July 2018 Staff Report contained a Response to Comments document ("July Responses") that addressed comments we previously made in a June 7, 2018 comment letter addressing the inadequacies in the Air Quality and Greenhouse Gas analyses conducted in the April 2018 Initial Study and Mitigated Negative Declaration (IS/MND) for the proposed Project. Both the June 7, 2018 comment letter and the July 17, 2018 comment letter specifically discussed the April 2018 IS/MND's and the July 2018 Staff Report's failure to properly evaluate the health risk impact posed to residential sensitive receptors located near the Project site. In our June 7 comment letter, we found that the Project Applicant failed to prepare a health risk assessment (HRA) for the proposed Project. Thus, we prepared a screening-level HRA to evaluate the Project's health risk impact and concluded that the health risk posed to adults, children, and infants at a residential receptor located approximately 1 meter from the Project site would be approximately 28, 190, and 310 in one million<sup>1</sup> and that the excess cancer risk over the course of a residential lifetime (assumed to be 30 years) would be approximately 530 in one million.<sup>2</sup> These risks all greatly exceed the South Coast Air Quality Management District's (SCAQMD) significance threshold of ten in one million. When the City responded to our June 7 comments in the July 2018 Staff Report by claiming that "there was no evidence to suggest that the Proposed Project would generate diesel emissions that are excessive or above acceptable levels that already occur within the environment", we reiterated how critical conducting a proper HRA for the Project was, as demonstrated by the findings of our

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<sup>1</sup> See SWAPE's June 7, 2017 comment letter on the Schrader Hotel Project.

<sup>2</sup> See SWAPE's June 7, 2017 comment letter on the Schrader Hotel Project.

analysis.<sup>3</sup> In response to our July 17, 2018 comment letter discussing the City's lack of a proper HRA, the City responded by stating,

"Last, with regards to impacts on public health, the appellant contends the MND fails to evaluate and mitigate potentially significant impacts on public health with regards to TAC emissions... The project MND acknowledges health risks based on the concentration of the substance and duration of exposure, but concludes the project would result in a less than significant impact related to construction TACs. The proposed project would be required to comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than five minutes at a location. There is no evidence to suggest that the project would generate diesel fuel emissions that are excessive or above acceptable levels that already occur within the environment. As such, the project is not considered to be a substantial source of diesel particulate matter warranting a HRA because daily truck trips to the project site in connection with the proposed hotel and residential uses would not generate substantial sources of diesel particulate matter. Additionally, the proposed hotel and residential uses are not subject to the Air Toxics Hot Spots Information and Assessment Act (Health and Safety Code Section 44360 et. seq.), and as such, a detailed HRA is not required. Therefore, the proposed project would result in a less than significant impact related to construction TACs" (Appeal, pp. 11).

We now supplement our previous comment letters to respond to the City's Appeal Report. Upon review of the City's Appeal, we maintain that the Project's potential health risk impacts have not been adequately addressed. In order to further demonstrate the need for a proper HRA, we evaluated the health risk posed to school children attending the Selma Avenue Elementary School and the Blessed Sacrament School located near the Project site, which have not been addressed or evaluated whatsoever in any report or analysis prepared for the Project.

Similar to the analysis we prepared in our June 7, 2018 letter, in order to conduct our screening level risk assessment we relied upon AERSCREEN, which is a screening level air quality dispersion model.<sup>4</sup> We prepared a preliminary HRA of the Project's health-related impact to sensitive receptors using the annual PM<sub>10</sub> exhaust estimates from the CalEEMod output files included in the September 2018 Appeal. Using Google Earth, we determined that the Selma Avenue Elementary School and the Blessed Sacrament School are approximately 213 and 290 meters away, respectively, from the Project site. We assumed that a child would attend the Selma Avenue Elementary School for 7 years and then attend the Blessed Sacrament School for 2 years, for a total of 9 years. We also assumed that construction and operation of the Project would occur in quick succession, with no gaps between each Project phase. The AERSCREEN model relies on a continuous average emission rate to simulate maximum downward concentrations from point, area, and volume emission sources. To account for the variability in equipment usage and truck trips over Project construction, we calculated an average diesel particulate matter (DPM) emission rate by the following equation.

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<sup>3</sup> See p. 76 of the Response to Comments included as Attachment A in the July 2018 Planning Department Staff Report for the Schrader Hotel Project.

<sup>4</sup> "AERSCREEN Released as the EPA Recommended Screening Model," USEPA, April 11, 2011, *available at*: [http://www.epa.gov/ttn/scram/guidance/clarification/20110411\\_AERSCREEN\\_Release\\_Memo.pdf](http://www.epa.gov/ttn/scram/guidance/clarification/20110411_AERSCREEN_Release_Memo.pdf)

$$\text{Emission Rate} \left( \frac{\text{grams}}{\text{second}} \right) = \frac{\text{lbs DPM}}{\text{days of construction}} \times \frac{453.6 \text{ grams}}{\text{lbs}} \times \frac{1 \text{ day}}{24 \text{ hours}} \times \frac{1 \text{ hour}}{3,600 \text{ seconds}}$$

Furthermore, we applied the same equation used to estimate the construction DPM emission rate to estimate the emission rate for Project operation.

$$\text{Emission Rate} \left( \frac{\text{grams}}{\text{second}} \right) = \frac{\text{lbs of DPM}}{365 \text{ days}} \times \frac{453.6 \text{ grams}}{\text{lbs}} \times \frac{1 \text{ day}}{24 \text{ hours}} \times \frac{1 \text{ hour}}{3,600 \text{ seconds}}$$

Construction and operational activity was simulated as a 0.64-acre rectangle area source in AERSCREEN, with dimensions of 53 meters by 49 meters. A release height of three meters was selected to represent the height of exhaust stacks on operational equipment and other heavy-duty vehicles, and an initial vertical dimension of one and a half meters was used to simulate instantaneous plume dispersion upon release. An urban meteorological setting was selected with model-default inputs for wind speed and direction distribution.

The AERSCREEN model generates maximum reasonable estimates of single-hour DPM concentrations from the Project site. EPA guidance suggests that in screening procedures, the annualized average concentration of an air pollutant be estimated by multiplying the single-hour concentration by 10%.<sup>5</sup> For example, for the single-hour concentration estimated by AERSCREEN for a child attending the Selma Avenue Elementary School during construction is approximately 54.29 µg/m<sup>3</sup> DPM at approximately 225 meters downwind. Multiplying this single-hour concentration by 10%, we get an annualized average concentration of 5.429 µg/m<sup>3</sup> for Project construction at the Selma Avenue Elementary School. Using this method, we derived the annualized average concentration from the single hour concentration for sensitive receptors at the Selma Avenue Elementary School and at the Blessed Sacrament School for operation.

We calculated the excess cancer risk to school children attending both schools using applicable HRA methodologies prescribed by the Office of Environmental Health Hazard Assessment (OEHHA). OEHHA recommends the use of Age Sensitivity Factors (“ASFs”) to account for the heightened susceptibility of young children to the carcinogenic toxicity of air pollution.<sup>6</sup> According to the revised guidance, quantified cancer risk should be multiplied by a factor of three for a receptor aged two until sixteen. We used a cancer potency factor of 1.1 (mg/kg-day)<sup>-1</sup> and an averaging time of 25,550 days. Additionally, as previously discussed, AERSCREEN calculates an annual average air concentration, assuming that emissions would be uniformly emitted over 24 hours per day, 7 days per week.<sup>7</sup> The students, however, would only be in school for an average of 10 hours per day, 5 days per week.<sup>8</sup> Similarly, Project construction is assumed to only occur during daylight hours, Monday through Friday. Therefore, an adjustment factor (“AF”) would need to be applied to the annual average concentration calculated in AERSCREEN in order to accurately estimate the cancer risk posed to these students during school hours. An exposure frequency of 180 days per year was used to reflect the number of days in a typical school year, and an exposure duration of approximately 9 years (a student from Pre-K to 8<sup>th</sup> grade) was

<sup>5</sup> [http://www.epa.gov/ttn/scram/guidance/guide/EPA-454R-92-019\\_OCR.pdf](http://www.epa.gov/ttn/scram/guidance/guide/EPA-454R-92-019_OCR.pdf)

<sup>6</sup> “Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments.” OEHHA, February 2015, available at: <https://oehha.ca.gov/media/downloads/cnr/2015guidancemanual.pdf>

<sup>7</sup> “Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments.” OEHHA, February 2015, available at: <https://oehha.ca.gov/media/downloads/cnr/2015guidancemanual.pdf>, p. 5-26

<sup>8</sup> [http://www.baaqmd.gov/~media/Files/Engineering/Air%20Toxics%20Programs/hrsa\\_guidelines.ashx?la=en](http://www.baaqmd.gov/~media/Files/Engineering/Air%20Toxics%20Programs/hrsa_guidelines.ashx?la=en)

used to represent the duration of Project exposure to the school child.<sup>9</sup> OEHHA also recommends that the 95<sup>th</sup> percentile, moderate intensity breathing rates be used to determine risk to children at schools.<sup>10</sup> The results of our calculations are summarized in the table below.

| The Maximum Exposed Individual Student Receptor (MEISC) |                                |                  |                                            |                           |     |                         |                |
|---------------------------------------------------------|--------------------------------|------------------|--------------------------------------------|---------------------------|-----|-------------------------|----------------|
| Activity                                                | Location                       | Duration (years) | Concentration ( $\mu\text{g}/\text{m}^3$ ) | Breathing Rate (L/kg-day) | ASF | AF                      | Cancer Risk    |
| Construction                                            | Selma Avenue Elementary School | 1.5              | 5.429                                      | 640                       | 3   | 3.36                    | 4.1E-04        |
| <b>Construction Duration</b>                            |                                | <b>1.5</b>       |                                            |                           |     |                         |                |
| Operation                                               | Selma Avenue Elementary School | 5.5              | 1.299                                      | 640                       | 3   | 3.36                    | 3.6E-04        |
|                                                         | Blessed Sacrament School       | 2.0              | 0.8742                                     | 640                       | 3   | 3.36                    | 8.7E-05        |
| <b>Operation Duration</b>                               |                                | <b>7.5</b>       |                                            |                           |     |                         |                |
| <b>Total Exposure Duration</b>                          |                                | <b>9.0</b>       |                                            |                           |     | <b>Student Exposure</b> | <b>8.5E-04</b> |

The excess cancer risk to a school child from ages five to fourteen years old is approximately 850 in one million, which greatly exceeds the SCAQMD's threshold of ten in one million. As a result, the Project's construction and operational emissions present a potentially significant impact to nearby sensitive receptors at the Selma Avenue Elementary School and the Blessed Sacrament School.

It should be noted that our analysis represents a screening-level health risk assessment, which is known to be more conservative, and tends to err on the side of health protection.<sup>11</sup> The purpose of a screening-level HRA is to determine if a more refined HRA needs to be conducted. If the results of a screening-level health risk are above applicable thresholds, then the Project should conduct a more refined HRA that is more representative of site specific concentrations. Our screening-level HRA demonstrates that construction and operation of the Project could result in a potentially significant health risk impact. As a result, a refined HRA must be prepared to examine the air quality impacts generated by Project construction and operation using site-specific meteorology.

Sincerely,



Matt Hagemann, P.G., C.Hg.



Hadley Nolan

<sup>9</sup> Our calculations are based on the assumption that a child attends the Selma Avenue Elementary School for Pre-Kindergarten (1 year) through 5<sup>th</sup> grade, then subsequently attends the Blessed Sacrament School from 6<sup>th</sup>-8<sup>th</sup> grade, for a total exposure duration of 9-years.

<sup>10</sup> "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, available at: <https://oehha.ca.gov/media/downloads/cnr/2015guidancemanual.pdf>, p. 5-30, 5-32

<sup>11</sup> <https://oehha.ca.gov/media/downloads/cnr/2015guidancemanual.pdf> p. 1-5

## EXHIBIT B

# MENLO SCIENTIFIC ACOUSTICS, INC.

Consultants in Acoustics and Communication Technologies

7 September 2018

Ms. Nirit Lotan

**Adams Broadwell Joseph & Cardozo**

601 Gateway Blvd., Suite 1000

South San Francisco, California 94080

Subject: **Schrader Hotel Project –City of Los Angeles  
Department of City Planning Appeal Report (Case No. VTT-74521-1A)**

Dear Ms. Lotan,

Menlo Scientific Acoustics, Inc., has reviewed the subject Appeal Report which includes responses to the comments in our letter dated 16 July 2018 and 10 August 2018 regarding the Mitigated Negative Declaration (MND) from April 2018 and the associated Noise Appendix F (Appendix) for the subject project.

The Appeal Report responses, included in Appeal Point no. 7, do not resolve the issues raised in our comments.

First, the Staff Response reiterates the claim the digital audio processor (DAP) is not a mitigation measure and is not relied upon as mitigation (1<sup>st</sup> paragraph of page A-8).

The fact is, however, that the Noise Appendix calculations assume a noise level of 84 dBA, which is the level the audio processor is allegedly supposed to achieve after reducing much higher levels of noise produced by the hotel audio systems or live entertainment systems. The audio processor is, in fact, a mitigation measure.

Second, the Staff Response completely ignores the fact, outlined in both our comment letters, that since only equipment attached to and controlled by the digital audio processor (DAP) can be limited by it, the DAP cannot limit the noise from acoustic instruments, including but not limited to drum kits, and especially bass drums.

Third, we further argued in our previous comments that the DAP cannot limit the noise from outside instrument amplifiers, including but not limited to guitar amplifiers and electronic keyboard amplifiers, and that live entertainment in many cases will provide their own “front of house” amplified sound system. These sound systems cannot be connected to the hotel’s fixed DAP, and therefore the DAP cannot “automatically adjust output volume in response to changing ambient noise levels,” as argued in PDF-2 language. The Staff Response argues that “PDF-4 includes specific measures that would be implemented in the event external audio equipment produces noise levels that exceed the identified threshold levels” (second paragraph of page A-8). The Response admits, therefore, in contradiction of previous assertions by the City, that outside equipment will be allowed in the hotel, which will not be controlled by the DAP.

PDF-4, which the Response is relying on for mitigating noise, merely limits operation hours and requires closing the doors of the dining areas when live entertainment is played, and closing the

## EXHIBIT B

# MENLO SCIENTIFIC ACOUSTICS, INC.

doors and windows in response to complaints. As we explained in our previous letters, this is a reactive measure that is only implemented after an impact has occurred and in any case is useless for noise produced outside the enclosed dining area.

Fourth, the City argues that “as designed, the glass partition will ensure that low frequency noise is fully attenuated by closing all walls and windows when live entertainment is occurring.” (2<sup>nd</sup> paragraph on page A-8). PDF-3 describes a 6’ high perimeter glass curtain wall. This is more accurately described as a barrier<sup>a</sup>. The calculations in Appendix F use only a single figure for the barrier attenuation<sup>b</sup>. This is mis-leading as a barrier is less effective for low-frequencies, and so the mitigation is less effective than that shown. The FHWA Noise Barrier Design Handbook explains that “a barrier is, generally, more effective in attenuating the higher frequencies as compared with the lower frequencies” (see Reference iv). FHWA Figure 9 illustrates how low frequencies are not effectively attenuated by a barrier. The Response ignores this fact. For events where amplified music (live or recorded) is employed, the low frequency impulsive noise from the amplified music will not be mitigated by limited height barriers.

Fifth, PDF-3 mentions a fritted glass<sup>c</sup> curtain wall system surrounding the third floor terrace. Fritted glass is porous glass through which gas or liquid may pass. As such, the acoustic performance will be diminished, and the 5 to 20 dBA barrier attenuation Appendix F attributes to the fritted glass curtain is not supported by evidence. The noise impact will in fact be greater than stated.

Finally, the MND analysis is underestimating the actual impacts. The MND uses the A-weighted sound levels (dBA). A-frequency weighting is similar to the response of the human ear at relatively low levels<sup>d</sup> – it lacks validity for sound levels above 60 dB<sup>e</sup>, and especially for low frequencies below 100 Hz. The 84 dBA roof top level noted in PDF-2 is more than 40 dB above the reference level for A-weighting, which is the 40 dB loudness curve<sup>f</sup>. The MND notes that the music level can be 104 dBA, and in many cases may be even higher. It is usually the low frequency noise (thumping bass) that can be heard from outside the venue and in nearby properties that is the basis for any complaints. Therefore, without accounting for the low frequencies that are effectively removed by the usual A-weighting the noise level from the hotel sound systems is underestimated.

Sincerely,  
MENLO SCIENTIFIC ACOUSTICS, INC.



Neil A. Shaw, FASA, FAES

NAS:sk

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<sup>a</sup> [https://www.fhwa.dot.gov/ENVIRONMENT/noise/noise\\_barriers/design\\_construction/design/design03.cfm](https://www.fhwa.dot.gov/ENVIRONMENT/noise/noise_barriers/design_construction/design/design03.cfm)

<sup>b</sup> ENV-2016-3751F - Appendix F: Noise Monitoring Data and Calculation Worksheets, page 23

<sup>c</sup> [http://www.adamschittenden.com/Frit\\_info.html](http://www.adamschittenden.com/Frit_info.html)

<sup>d</sup> <http://www.acoustic-glossary.co.uk/frequency-weighting.htm>

<sup>e</sup> [https://www.acoustics.asn.au/conference\\_proceedings/AAS2013/papers/p39.pdf](https://www.acoustics.asn.au/conference_proceedings/AAS2013/papers/p39.pdf)

<sup>f</sup> <https://www.iso.org/obp/ui/#iso:std:iso:226:ed-2:v1:en>



# COMPSTAT

## Hollywood Area Profile

07/15/18 - 08/11/18



**AREA  
COMMANDING OFFICER:** Cory S. Palka  
**Rank:** CAPT-III  
**Date of Rank:** August 10, 2014  
**Date Assigned Area:** March 6, 2016  
**LAPD Appointment Date:** July 7, 1986



**PATROL DIVISION  
COMMANDING OFFICER:** Steven D. Lurie  
**Rank:** CAPT-I  
**Date of Rank:** March 18, 2018  
**Date Assigned Area:** August 5, 2018  
**LAPD Appointment Date:** June 9, 1997

### CRIME STATISTICS for week ending 08/11/18

| VIOLENT CRIMES      | 07/15/18 TO<br>08/11/18 | 06/17/18 TO<br>07/14/18 | %<br>Change | 06/17/18 TO<br>07/14/18 | 05/20/18 TO<br>06/16/18 | %<br>Change | YTD<br>2018 | YTD<br>2017 | %<br>Change | YTD<br>2018 | YTD<br>2016 | %<br>Change |
|---------------------|-------------------------|-------------------------|-------------|-------------------------|-------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| HOMICIDE            | 0                       | 0                       | N.C.*       | 0                       | 0                       | N.C.*       | 5           | 2           | 150.0%      | 5           | 3           | 66.7%       |
| RAPE (121,122)      | 7                       | 4                       | 75.0%       | 4                       | 5                       | -20.0%      | 46          | 54          | -14.8%      | 46          | 52          | -11.5%      |
| RAPE (815,820,821)  | 0                       | 7                       | -100.0%     | 7                       | 9                       | -22.2%      | 45          | 45          | 0.0%        | 45          | 45          | 0.0%        |
| TOTAL RAPE          | 7                       | 11                      | -36.4%      | 11                      | 14                      | -21.4%      | 91          | 99          | -8.1%       | 91          | 97          | -6.2%       |
| ROBBERY             | 51                      | 47                      | 8.5%        | 47                      | 32                      | 46.9%       | 357         | 297         | 20.2%       | 357         | 336         | 6.3%        |
| AGGRAVATED ASSAULTS | 62                      | 54                      | 14.8%       | 54                      | 44                      | 22.7%       | 444         | 415         | 7.0%        | 444         | 354         | 25.4%       |
| TOTAL VIOLENT       | 120                     | 112                     | 7.1%        | 112                     | 90                      | 24.4%       | 897         | 813         | 10.3%       | 897         | 790         | 13.5%       |

| PROPERTY CRIMES      | 07/15/18 TO<br>08/11/18 | 06/17/18 TO<br>07/14/18 | %<br>Change | 06/17/18 TO<br>07/14/18 | 05/20/18 TO<br>06/16/18 | %<br>Change | YTD<br>2018 | YTD<br>2017 | %<br>Change | YTD<br>2018 | YTD<br>2016 | %<br>Change |
|----------------------|-------------------------|-------------------------|-------------|-------------------------|-------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| BURGLARY             | 46                      | 32                      | 43.8%       | 32                      | 34                      | -5.9%       | 300         | 280         | 7.1%        | 300         | 376         | -20.2%      |
| MOTOR VEHICLE THEFT  | 36                      | 49                      | -26.5%      | 49                      | 43                      | 14.0%       | 316         | 360         | -12.2%      | 316         | 359         | -12.0%      |
| BTFV                 | 128                     | 164                     | -22.0%      | 164                     | 145                     | 13.1%       | 1093        | 1169        | -6.5%       | 1093        | 979         | 11.6%       |
| PERSONAL/OTHER THEFT | 132                     | 151                     | -12.6%      | 151                     | 145                     | 4.1%        | 1185        | 1078        | 9.9%        | 1185        | 1145        | 3.5%        |
| TOTAL PROPERTY       | 342                     | 396                     | -13.6%      | 396                     | 367                     | 7.9%        | 2894        | 2887        | 0.2%        | 2894        | 2859        | 1.2%        |
| TOTAL PART I         | 462                     | 508                     | -9.1%       | 508                     | 457                     | 11.2%       | 3791        | 3700        | 2.5%        | 3791        | 3649        | 3.9%        |

|                                    |    |    |         |    |    |       |     |     |        |     |     |        |
|------------------------------------|----|----|---------|----|----|-------|-----|-----|--------|-----|-----|--------|
| Child/Spousal Abuse (Part I & II)* | 38 | 45 | -15.6%  | 45 | 41 | 9.8%  | 361 | 366 | -1.4%  | 361 | 304 | 18.8%  |
| SHOTS FIRED                        | 1  | 3  | -66.7%  | 3  | 2  | 50.0% | 26  | 25  | 4.0%   | 26  | 31  | -16.1% |
| SHOOTING VICTIMS                   | 0  | 3  | -100.0% | 3  | 0  | N.C.* | 9   | 13  | -30.8% | 9   | 15  | -40.0% |

### ARREST STATISTICS for week ending 08/11/18

| ARRESTS              | 07/15/18 TO<br>08/11/18 | 06/17/18 TO<br>07/14/18 | %<br>Change | 06/17/18 TO<br>07/14/18 | 05/20/18 TO<br>06/16/18 | %<br>Change | YTD<br>2018 | YTD<br>2017 | %<br>Change | YTD<br>2018 | YTD<br>2016 | %<br>Change |
|----------------------|-------------------------|-------------------------|-------------|-------------------------|-------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| HOMICIDE             | 0                       | 0                       | N.C.*       | 0                       | 0                       | N.C.*       | 3           | 2           | 50.0%       | 3           | 4           | -25.0%      |
| RAPE                 | 1                       | 2                       | -50.0%      | 2                       | 0                       | N.C.*       | 9           | 4           | 125.0%      | 9           | 18          | -50.0%      |
| ROBBERY              | 25                      | 21                      | 19.0%       | 21                      | 12                      | 75.0%       | 138         | 117         | 17.9%       | 138         | 88          | 56.8%       |
| AGGRAVATED ASSAULT** | 37                      | 35                      | 5.7%        | 35                      | 30                      | 16.7%       | 314         | 303         | 3.6%        | 314         | 265         | 18.5%       |
| BURGLARY             | 12                      | 12                      | 0.0%        | 12                      | 8                       | 50.0%       | 79          | 70          | 12.9%       | 79          | 69          | 14.5%       |
| LARCENY              | 17                      | 16                      | 6.3%        | 16                      | 16                      | 0.0%        | 164         | 154         | 6.5%        | 164         | 212         | -22.6%      |
| MOTOR VEHICLE THEFT  | 14                      | 8                       | 75.0%       | 8                       | 9                       | -11.1%      | 94          | 104         | -9.6%       | 94          | 83          | 13.3%       |
| TOTAL VIOLENT        | 63                      | 58                      | 8.6%        | 58                      | 42                      | 38.1%       | 464         | 426         | 8.9%        | 464         | 375         | 23.7%       |
| TOTAL PART I         | 106                     | 94                      | 12.8%       | 94                      | 75                      | 25.3%       | 801         | 754         | 6.2%        | 801         | 739         | 8.4%        |
| TOTAL ALL ARRESTS    | 786                     | 707                     | 11.2%       | 707                     | 901                     | -21.5%      | 6575        | 5193        | 26.6%       | 6575        | 6695        | -1.8%       |

\*Part II Child/Spousal Abuse Simple Assaults not included in Part I Aggravated Assaults above to comply with the FBI's Uniform Crime Reporting guidelines.

\*\*Statistics include domestic violence.

N.C. - Not Calculable

Statistics are based on the date the crime or arrest occurred.

Arrest statistics include arrests made by outside agencies.

September 6, 2018

Mindy Nguyen  
Jason Hernández  
200 N. Spring St., Room 621  
Los Angeles, CA 90012

Project Site: 1600-1616 ½ N Schrader Boulevard and 6533 Selma Avenue  
Case Nos.: VTT-74521-1A, SUPPORT APPEAL  
CPC-2016-3750-VZC-HD-MCUP-ZAA-SPR  
CEQA No.: ENV-2016-3751-MND

Dear Ms. Nguyen and Mr. Hernandez,

I would like to submit the following comments on the project proposed for 1600 N Schrader Blvd., Case Nos.: VTT-74521-1A, CPC-2016-3750-VZC-HD-MCUP-ZAA-SPR. These comments are also included as an attachment.

### **1. No Justification for Airspace Lots – Support Appeal**

There is no justification for the sub-division of this property into airspace lots. **The only justification for subdivision into airspace lots is the construction of condominiums, where this is necessary to facilitate individual ownership of the units. In this case, it's clearly intended as a device to allow the property owner to sell the lots individually in order to maximize the return on their investment.**

**Additionally, this is dangerous because it makes assigning responsibility for compliance with conditions more complex and difficult.** We're already having problems in Hollywood with hotel owners who violate conditions and avoid responding to complaints. Allowing the property owner to sell off pieces of the building to other investors will only exacerbate this problem.

### **2. MND Is Inadequate**

The following sections of the MND fail to adequately consider impacts from this project:

#### **Noise**

The MND's evaluation of noise impacts is inadequate. The analysis of noise levels is based on theoretical assumptions rather than real world experience. While club owners all promise that live music will not disturb the neighborhood, in Hollywood the reality has shown that noise has been an ongoing problem for years. Currently the most prominent offenders are the Dream Hotel and Yamashiro, both of which have generated numerous noise complaints to the LAPD. The LAPD's Hollywood Division is currently understaffed, and due to ongoing difficulties finding qualified recruits, there is no reason to believe staffing levels will rise any time in the near future.

This project includes multiple outdoor spaces and requests a permit for live entertainment on premises. Approving this project will only burden the Hollywood Division with additional noise complaints, when officers are already working hard to deal with a steady increase in violent crime.

#### **Police**

The MND says we should consider:

(b) the demand for police services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional contribution to the demand; and  
(c) whether the project includes security and/or design features that would reduce the demand for police services.

The LAPD has been understaffed for years, and the number of officers serving in the Hollywood Division is already low compared to the area's population. **Due to ongoing recruitment difficulties, there is a statewide shortage of law enforcement officers which is likely to continue for years to come, regardless of increased revenue from development.**

California Asks: Where Have All the Cops Gone? From USA Today  
<https://www.usatoday.com/story/news/nation/2015/09/17/california-police-shortage/72364360/>

**There is no reason to believe that the LAPD's current staffing difficulties will end any time soon, and enhanced facilities and equipment will be meaningless without additional officers.**

The "design-out crime" features mentioned in the MND have been included in many recent projects in the Hollywood area. As the MND shows, violent crime in the area has been increasing by double digits for years. So far this year LAPD stats for the Hollywood Division show that violent crime has increased by 10.3% over the same period in 2017. Please see attached LAPD stats.

**"Design-out crime" features have made no noticeable contribution to the reduction of crime in the Hollywood area. They cannot be considered an effective mitigation measure.**

The applicant makes a point of saying that the LAPD is involved in creating conditions for the project, but it is important to emphasize that this is the only way that LAPD can offer input. The LAPD is not a planning agency and does not have planning expertise. It is the DCP's job to evaluate the project's impacts in terms of crime. Unfortunately the DCP has chosen to ignore Hollywood's rising violent crime rate as it continues to approve projects that are bound to have negative impacts on the safety of area residents.

### **3. Findings Related to Approval of Alcohol Permit**

The LAMC states that in granting an alcohol permit, the City must make the following finding:

*That the granting of the application will not result in an undue concentration of premises for the sale or dispensing for consideration of alcoholic beverages [...] 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;*

In a letter dated October 6, 2014, Chief Charlie Beck asked Chief Zoning Administrator Linn Wyatt to exercise caution in the approval of new alcohol permits, referring more than once to the "oversaturation" of ABC locations in Hollywood. He states:

*"From the problems of the past, as well as recent events, it is evident that the area is not conducive to handling the increased occupancies and increased traffic problems deriving from the existing ABC locations."*

He goes on to say:

*"Problems include public intoxication, traffic collisions involving pedestrians, driving under the*

*influence, assault with a deadly weapon, robberies, thefts, fights with serious injuries, shootings and rapes as well."*

Since Chief Beck submitted that letter, violent crime has increased substantially in the Hollywood area, as the DCP continues to grant additional alcohol permits with liberal conditions. Please view the attachment to see current stats for crime in Hollywood.

Given that in 2014 Chief Beck stated that the Hollywood area was already oversaturated with ABC locations, that in his letter he expressed concern about the rate of violent crime, and that since then the incidence of violent crime has increased steadily, it is hard to imagine that the City could make a finding that, "the granting of the application will not result in an undue concentration of premises for the sale or dispensing for consideration of alcoholic beverages."

#### **4. Research Shows Link Between Alcohol Density and Violent Crime**

Research has shown an association between alcohol outlet density/alcohol use and violent crime. Please see attached excerpts from the following:

*The Effectiveness of Limiting Alcohol Outlet Density As a Means of Reducing Excessive Alcohol Consumption and Alcohol-Related Harms, 2009, American Journal of Preventive Medicine. This paper surveys decades of literature regarding alcohol outlet density and related harms, including violent crime. It finds that of 23 reports studied, a significant majority indicated positive associations between alcohol outlet density and violence.*

*Alcohol Outlets as Attractors of Violence and Disorder, 2008, Urban Institute  
<https://www.ncjrs.gov/pdffiles1/nij/grants/227646.pdf>*

For the reasons given above, the Department of City Planning must reject this project in its current form.

Thank you for your time.

Sincerely,  
Casey Maddren  
2141 Cahuenga, Apt. 17  
Los Angeles, CA 90068



James Williams &lt;james.k.williams@lacity.org&gt;

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**Fw: Home Sharing Ordinance: CF 14-1635-S2/CPC-2016-1243-CA**

3 messages

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**Jane Taguchi** <jteis@sbcglobal.net>  
Reply-To: Jane Taguchi <jteis@sbcglobal.net>  
To: "cpc@lacity.org" <cpc@lacity.org>

Fri, Sep 7, 2018 at 2:07 PM

----- Forwarded Message -----

**From:** Jane Taguchi <jteis@sbcglobal.net>  
**To:** [matthew.glesne@lacity.org](mailto:matthew.glesne@lacity.org)  
**Sent:** Saturday, August 25, 2018 11:18 PM  
**Subject:** re: Home Sharing Ordinance: CF 14-1635-S2/CPC-2016-1243-CA

Dear City Planning Commission of Los Angeles,

I am writing to you today about the proposed home-sharing ordinance to be heard on September 13. We needed these regulations 4 years ago. Illegal short term rentals are turning neighbor against neighbor, turning some neighborhoods into expensive vacation zones where full time residents are forced out, and critical housing units are being turned into money-making vacation investment units instead of being homes or residences.

I have seen that Airbnb has operated illegally and used their venture capital power to fight every single city in the world. The little guy, like me, a law-abiding citizen was no match. I attended almost EVERY SINGLE relevant hearing, and information event. The City did not protect me. But I was harassed by an Airbnb host who was aware that the City of LA was not doing any enforcement. I did not have the time, the money or lobbying power or influence to stop this illegal activity. The Airbnb host even took me to civil court using lies in her sworn testimony in order to harass me and my neighbors.

If I must acquiesce to allow this vacation activity next door to me, I must insist that Airbnb pay back TOT taxes for all these years of illegal activity. San Francisco was paid millions of back taxes by Airbnb when they passed their short-term rental law. Airbnb and their hosts should not be unfairly rewarded for operating illegally. That would be so unfair to residents, like me, who have had to suffer with these unidentified illegal vacation rentals in our neighborhoods for years and years.

If such rentals are legalized, they must get permits, be identified like any other business, pay their share of taxes, and follow health & safety regulations.

I support an ordinance which includes allowing home-sharing only in one's primary residence, not in RSO units, includes a 90 day CAP, requires hosts to register with the city, pays TOT and requires platform accountability. This is critical to protect housing, protect tenants, and protect communities.

TORS should not be used as a vehicle for illegal conversions of residential units for existing and new units. Developers that receive a TORS entitlement but that build residential units instead, should not

be allowed to later convert the units into Short-term rentals.

Please pass this ordinance ASAP to preserve the enjoyment of Los Angeles neighborhoods for residents.

Sincerely,  
Jane Taguchi  
22 year Silver Lake resident

---

**Jane Taguchi** <jteis@sbcglobal.net>  
Reply-To: Jane Taguchi <jteis@sbcglobal.net>  
To: "cpc@lacity.org" <cpc@lacity.org>

Fri, Sep 7, 2018 at 2:08 PM

----- Forwarded Message -----

**From:** Jane Taguchi <jteis@sbcglobal.net>  
**To:** "matthew.glesne@lacity.org" <matthew.glesne@lacity.org>  
**Sent:** Tuesday, August 28, 2018 3:57 PM  
**Subject:** re: Home Sharing Ordinance: CF 14-1635-S2/CPC-2016-1243-CA

Dear City Planning Commission of Los Angeles,

I am writing to you today about the proposed home-sharing ordinance to be heard on September 13. We need these regulations NOW – illegal short term rentals are decimating neighborhoods and taking away critical housing units.

Please see my attached letter.

- Jane Taguchi

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 **To Matthew Glesne.pdf**  
318K

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**Jane Taguchi** <jteis@sbcglobal.net>  
Reply-To: Jane Taguchi <jteis@sbcglobal.net>  
To: "cpc@lacity.org" <cpc@lacity.org>

Fri, Sep 7, 2018 at 2:08 PM

----- Forwarded Message -----

**From:** Jane Taguchi <jteis@sbcglobal.net>  
**To:** matthew.glesne@lacity.org  
**Sent:** Wednesday, August 29, 2018 7:06 AM  
**Subject:** re: Home Sharing Ordinance: CF 14-1635-S2/CPC-2016-1243-CA

Dear City Planning Commission of Los Angeles,

I am writing to you today about the proposed home-sharing ordinance to be heard on September 13. We need these regulations NOW – illegal short term rentals are decimating neighborhoods and taking away critical housing units.

I support an ordinance which includes allowing home-sharing only in one's primary residence, not in RSO units, includes a 90-120 day CAP, requires hosts to register with the city, pays TOT and requires platform accountability. This is critical to protect housing, protect tenants, and protect communities.

TORS should not be used as a vehicle for illegal conversions of residential units for existing and new units. Developers that receive a TORS entitlement but that build residential units instead, should not be allowed to later convert the units into Short-term rentals.

Please pass this ordinance ASAP to preserve the enjoyment of Los Angeles neighborhoods for residents.

I feel that the ordinance unduly favors short term rental hosts. Please pass the ordinance now, and let's fine tune it later. We must stop the illegal operations of short term rental platforms NOW.

Sincerely,  
Jane Taguchi



James Williams &lt;james.k.williams@lacity.org&gt;

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**RE: Home Sharing Ordinance: CF 14-1635-S2/CPC-2016-1243-CA (CPC agenda 9-13-18)**

2 messages

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**Barbara Broide** <bbroide@hotmail.com>

Fri, Sep 7, 2018 at 1:06 PM

To: LA City Planning Commission &lt;cpc@lacity.org&gt;

Cc: "matthew.glesne@lacity.org" &lt;matthew.glesne@lacity.org&gt;, Hagu Solomon-Cary &lt;hagu.solomon-cary@lacity.org&gt;, Paul Koretz - cd 5 &lt;paul.koretz@lacity.org&gt;

Dear City Planning Commission Members,

In a time when Los Angeles has a tremendous affordable housing shortage, it is difficult to understand how and why the City would consider an ordinance that provides economic incentives for landlords to convert available housing for use as short-term rentals. I can well understand an ordinance to allow for short-term rentals during the Olympics or during times of special needs (such as after a natural disaster), but we have already seen the decimating impact of short-term rentals at a time when the illegal practice has gone unenforced. There is more than adequate documentation that illegal short-term rentals are damaging neighborhoods and taking away critically needed housing units. By decreasing housing supply, they also contribute to rent/housing cost escalation.

I am hoping that the City chooses to enact a true "home-sharing" ordinance which includes allowing home-sharing only in one's primary residence, not in RSO units, includes a 90 day CAP, requires hosts to register with the city, pays TOT and requires platform accountability. This is critical to protect housing, protect tenants, and protect communities. How will the City prove that a housing unit is one's primary home? Can each member of a family claim to have a separate primary residence? Have the inspectors (and City Attorney) who have been unable to enforce existing law had adequate input into making certain that they will be able to enforce the new ordinance adopted?

TORS should not be used as a vehicle for illegal conversions of residential units for existing and new units. Developers that receive a TORS entitlement but that build residential units instead, should not be allowed to later convert the units into Short-term rentals.

With the legalization of accessory dwelling units on almost all single family properties, it is important that these units NOT be built and permitted for short-term rental use. The units built in the backyards of our single family neighborhoods should provide long-term housing or be used to house family members -- not as a cottage industry that turns our residential properties into businesses providing unfair competition with the hospitality industry. It should also be noted that if single family homes are permitted to build accessory dwelling units and operate them as short-term rentals on their properties, then the value/cost of those properties will increase and will serve to further inflate land/housing costs in Los Angeles -- raising the economic bar and making it ever more difficult for families and individuals to buy a home. Should the practice of building granny units to operate as short-term rentals become popular, this could serve to undermine the existing hospitality business in certain areas.

As is always the case, enforcement and the ability to enforce are keys to whether or not new regulations should be adopted. It appears that City inspectors could not enforce the current illegality of short-term rentals. One has to wonder whether adequate safeguards and agreements with platform operators can be or have been forged to enable consistent and timely enforcement of the time limits

established -- whether they be 30, 60 90 or whatever number of days are finally agreed upon. I request/strongly suggest the inclusion of a mandatory evaluation of the program at specific benchmark times with the built in triggering of change should any aspects of enforcement prove insufficient/unable to enforce as envisioned. Those participating in the program --both platforms and individual properties need to be told that this program will operate only so long as there is enforcement. Should enforcement be halted due to administrative issues or litigation brought by any of the parties involved, the program should be halted and the practice made illegal with provisions defined in advance as to how the illegal practice would and could be halted. There have been too many instances where enforcement has failed the citizens of Los Angeles. To enact a program that has countless opportunities for abuse (and that legalizes the practices of those who have already shown a disdain for existing law) is of concern.

The current situation whereby multiple housing units are being used for short-term rentals by single operators is unacceptable and should have been shut down by the City years ago. There is a need to get an enforceable policy adopted. There must be a dedicated enforcement unit to actively monitor these rentals that is fully funded by fees drawn from the program's participants (platforms and landlords). While I would personally prefer to halt the use of our residential neighborhoods for short-term rentals due to the negative impacts on our neighborhood stability, neighborhood watch programs and crime prevention activities, I realize that this horse has been out of the barn for too long to halt the practice from a political point of view. The shorter the number of days permitted, the better so that those sharing their homes have an incentive to use their spare bedroom/space to provide housing for Angelenos who live and work in our City - rather than to provide housing for tourists/visitors who will come and go. Our affordable housing shortage could be greatly diminished by using these "extra" rooms for tenants who will be a part of our communities. If it were left to me, I would only allow for short-term rentals when the City's vacancy rate exceeds a set percent --- over, for example, 6% or whatever figure seems to represent a healthy rental marketplace.

Please advocate for an enforceable ordinance that permits not more than 90 days / year to be rented in one's primary residence. Such an ordinance will help to meet the housing needs of our City and to preserve the safety and enjoyment of Los Angeles neighborhoods for residents who live in these neighborhoods and for those looking to have a home in Los Angeles.

Sincerely,

Barbara Broide  
Resident of CD 5

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**James Williams** <james.k.williams@lacity.org>

Tue, Sep 11, 2018 at 8:16 AM

To: Barbara Broide <bbroide@hotmail.com>

Cc: Cecilia Lamas <cecilia.lamas@lacity.org>, Rocky Wiles <Rocky.Wiles@lacity.org>

Good morning Barbara,

Thank you for your submission. Your letter will be shared with the City Planning Commission and the Planning Executive Office.

James

**James K. Williams**  
**Commission Executive Assistant II**  
**City Planning Commission**  
**Department of City Planning**

9/11/2018

City of Los Angeles Mail - RE: Home Sharing Ordinance: CF 14-1635-S2/CPC-2016-1243-CA (CPC agenda 9-13-18)



**T:** (213) 978-1300  
200 N. Spring St., Room 272  
Los Angeles, CA. 90012

[James.K.Williams@lacity.org](mailto:James.K.Williams@lacity.org)

[Quoted text hidden]



James Williams &lt;james.k.williams@lacity.org&gt;

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**RE: Home Sharing Ordinance: CF 14-1635-S2/CPC-2016-1243-CA (CPC agenda 9-13-18)**

1 message

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**Barbara Broide** <bbroide@hotmail.com>

Fri, Sep 7, 2018 at 1:06 PM

To: LA City Planning Commission &lt;cpc@lacity.org&gt;

Cc: "matthew.glesne@lacity.org" &lt;matthew.glesne@lacity.org&gt;, Hagu Solomon-Cary &lt;hagu.solomon-cary@lacity.org&gt;, Paul Koretz - cd 5 &lt;paul.koretz@lacity.org&gt;

Dear City Planning Commission Members,

In a time when Los Angeles has a tremendous affordable housing shortage, it is difficult to understand how and why the City would consider an ordinance that provides economic incentives for landlords to convert available housing for use as short-term rentals. I can well understand an ordinance to allow for short-term rentals during the Olympics or during times of special needs (such as after a natural disaster), but we have already seen the decimating impact of short-term rentals at a time when the illegal practice has gone unenforced. There is more than adequate documentation that illegal short-term rentals are damaging neighborhoods and taking away critically needed housing units. By decreasing housing supply, they also contribute to rent/housing cost escalation.

I am hoping that the City chooses to enact a true "home-sharing" ordinance which includes allowing home-sharing only in one's primary residence, not in RSO units, includes a 90 day CAP, requires hosts to register with the city, pays TOT and requires platform accountability. This is critical to protect housing, protect tenants, and protect communities. How will the City prove that a housing unit is one's primary home? Can each member of a family claim to have a separate primary residence? Have the inspectors (and City Attorney) who have been unable to enforce existing law had adequate input into making certain that they will be able to enforce the new ordinance adopted?

TORS should not be used as a vehicle for illegal conversions of residential units for existing and new units. Developers that receive a TORS entitlement but that build residential units instead, should not be allowed to later convert the units into Short-term rentals.

With the legalization of accessory dwelling units on almost all single family properties, it is important that these units NOT be built and permitted for short-term rental use. The units built in the backyards of our single family neighborhoods should provide long-term housing or be used to house family members -- not as a cottage industry that turns our residential properties into businesses providing unfair competition with the hospitality industry. It should also be noted that if single family homes are permitted to build accessory dwelling units and operate them as short-term rentals on their properties, then the value/cost of those properties will increase and will serve to further inflate land/housing costs in Los Angeles -- raising the economic bar and making it ever more difficult for families and individuals to buy a home. Should the practice of building granny units to operate as short-term rentals become popular, this could serve to undermine the existing hospitality business in certain areas.

As is always the case, enforcement and the ability to enforce are keys to whether or not new regulations should be adopted. It appears that City inspectors could not enforce the current illegality of short-term rentals. One has to wonder whether adequate safeguards and agreements with platform operators can be or have been forged to enable consistent and timely enforcement of the time limits

established -- whether they be 30, 60 90 or whatever number of days are finally agreed upon. I request/strongly suggest the inclusion of a mandatory evaluation of the program at specific benchmark times with the built in triggering of change should any aspects of enforcement prove insufficient/unable to enforce as envisioned. Those participating in the program --both platforms and individual properties need to be told that this program will operate only so long as there is enforcement. Should enforcement be halted due to administrative issues or litigation brought by any of the parties involved, the program should be halted and the practice made illegal with provisions defined in advance as to how the illegal practice would and could be halted. There have been too many instances where enforcement has failed the citizens of Los Angeles. To enact a program that has countless opportunities for abuse (and that legalizes the practices of those who have already shown a disdain for existing law) is of concern.

The current situation whereby multiple housing units are being used for short-term rentals by single operators is unacceptable and should have been shut down by the City years ago. There is a need to get an enforceable policy adopted. There must be a dedicated enforcement unit to actively monitor these rentals that is fully funded by fees drawn from the program's participants (platforms and landlords). While I would personally prefer to halt the use of our residential neighborhoods for short-term rentals due to the negative impacts on our neighborhood stability, neighborhood watch programs and crime prevention activities, I realize that this horse has been out of the barn for too long to halt the practice from a political point of view. The shorter the number of days permitted, the better so that those sharing their homes have an incentive to use their spare bedroom/space to provide housing for Angelenos who live and work in our City - rather than to provide housing for tourists/visitors who will come and go. Our affordable housing shortage could be greatly diminished by using these "extra" rooms for tenants who will be a part of our communities. If it were left to me, I would only allow for short-term rentals when the City's vacancy rate exceeds a set percent --- over, for example, 6% or whatever figure seems to represent a healthy rental marketplace.

Please advocate for an enforceable ordinance that permits not more than 90 days / year to be rented in one's primary residence. Such an ordinance will help to meet the housing needs of our City and to preserve the safety and enjoyment of Los Angeles neighborhoods for residents who live in these neighborhoods and for those looking to have a home in Los Angeles.

Sincerely,

Barbara Broide  
Resident of CD 5

# RAYMOND KLEIN

908 Kenfield Ave

Los Angeles, CA 90049

Rklein908@gmail.com

Sept 10, 2018

City Planning Commission

200 North Spring Street, Room 532

Los Angeles, CA 90012

email to: [cpc@lacity.org](mailto:cpc@lacity.org)

[matthew.glesne@lacity.org](mailto:matthew.glesne@lacity.org);

[cally.hardy@lacity.org](mailto:cally.hardy@lacity.org);

[arthi.varma@lacity.org](mailto:arthi.varma@lacity.org)

15 copies by mail

Re: CPC-2016-1243-CA; CEQA:ENV-2016-1277-ND; ENV-2017-3410-ND

Dear Commissioners,

In connection with Agenda Item 13 on September 13, 2018, it would be **premature, unlawful and an abuse of discretion** to:

1. Determine that the Home Sharing Ordinance is not a “project”
2. Determine that the Home Sharing Ordinance is exempt from CEQA
3. Make findings with respect to, or adopt, the Negative Declaration No. ENV-2016-1277-ND

The wording itself of the proposed Finding (item 3 of recommended actions on the agenda) proves the illegality: “after consideration of . . . all comments received . . . .” Such consideration, which is essential, is impossible prior to October 1, 2018, because the Notice of Intent to Adopt a Negative Declaration states that the City of Los Angeles will receive comments on the proposed negative declaration until October 1, 2018.

Sincerely,

*Raymond Klein*

Raymond Klein



James Williams <james.k.williams@lacity.org>

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## Home Sharing Ordinance: CF 14-1635-S2/CPC-2016-1243-CA

1 message

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**Sharon Commins** <smcommins@msn.com>

Tue, Sep 11, 2018 at 8:24 AM

To: "cpc@lacity.org" <cpc@lacity.org>

Dear City Planning Commission of Los Angeles,

Neighborhood stability for all stakeholders is a key concept in the General Plan Framework, and should be upheld through passing a strong home sharing ordinance with the following provisions:

allowing home-sharing only in one's primary residence, never in RSO units  
require proof of residence and liability insurance for the activity  
register and obtain a City permit with notice to property owners within 500 ft.  
impose a firm 90 day annual cap on home-sharing but no more than 90 days  
to establish a trust fund for TOT receipts, to be used for enforcement  
Required platform accountability for listings  
TORS shall not be used for illegal conversions of residential units  
Kind regards,

Sharon Commins

Mark Ryavec  
1615 Andalusia Avenue, Venice, CA 90291  
310-871-6265/delphiassociates@ca.rr.com

September 10, 2018

The Honorable Samantha Millman, President  
Los Angeles Planning Commission  
Attn: James K. Williams, Commission Executive Assistant  
City Hall, 200 N. Spring Street, Los Angeles, CA 90012

Re: Request to Exempt Luxury Homes Erroneously Under the RSO from the Pending Short-Term Rental Ban/Allow STR Use for Structures Adjacent to Owner-Occupied Properties for 360 Days Per Year/CF-14-1635-S2

Dear President Millman,

As your commission moves forward to finalize the ordinance to regulate short term rentals please include a mechanism to allow short term rental use of luxury homes that are erroneously covered by the City's Rent Stabilization Ordinance (RSO) and for second homes on parcels that have an adjacent owner-occupied structure.

I own a four-bedroom, two-bathroom house with 2,300 square feet at 453 Rialto Avenue in Venice, CA. The house was built in 1905 in the Islamo-Byzantine style.



It was designed and built by David Gunning, an architect who was in the employ of Abbot Kinney on Kinney's Venice-of-America development. It was later owned by Bob Hope who supposedly rented it to Jack Benny's sidekick Eddie "Rochester" Anderson, thus breaking the color line in Venice.

Behind the house on the same parcel is an 840 square foot one-bedroom apartment over a three-car garage. This structure was built in 1949 and I completely remodeled it over the last several years. The Department of Building and Safety has determined that the property

is not a duplex, but rather two distinct single-family residences. I now reside in this rear flat.

The house at 453 Rialto has been rented under a long-term lease though I would like the option of renting the main house on a short-term basis. It most recently rented for \$9,350 a month, thus it cannot be considered "affordable housing." Whether it is rented long term or short term will be of no consequence to the City's objective of increasing the number of affordable units in the city.

Historically, the house was placed under the RSO, I presume, due to Venice's earlier days as a run-down area of the city with low rents. As seen in the photo, the house speaks to the earliest years of Venice of America. In other cities it would be a likely candidate for use as a proper Bed and Breakfast, allowing visitors to experience an historic home rich in ornate design elements and the feel of life in an earlier era.

However, as currently drafted the new Short-Term Rental Ordinance will preclude this use. First, the ordinance will preclude STR use in any rent-controlled property and it does not appear that the property can be removed from the RSO. While I have applied to the Department of Housing and Community Investment for a luxury exemption, that process has already taken three months and there is no certainty that the exemption will be granted due to the unrealistic requirement that I produce proof that the house was not affordable at the time the RSO was adopted. As the saying goes, it is difficult to disprove a negative. Several of the past owners have passed away so finding such documentation is not possible.

Next, while I live on the property, I live in the separate legal rear unit. This does not appear to be sufficient under the draft of the STR ordinance to permit the STR use in the main house.

Despite claims that the draft ordinance is a reasonable compromise of competing concerns about STRs, it does not allow what should be a logical and reasonable use of this historic structure.

Finally, I would mention that the City has a financial interest in addressing the concerns I have raised. Under a long-term lease, the City gains no transient occupancy tax (TOT) from this property, while under short term rentals the City would gain the 14% TOT on monthly rents in the range of \$8,000 to \$10,000. This would presumably apply to other properties across the city that are in a similar predicament, barred from STR use since the owner lives on the same parcel but not in the instant house, and the property is still under the RSO despite the fact that for many years it has rented at luxury rates.

I would ask that your commission amend the proposed ordinance to allow STR use for an owner's principle place of residence or a residence on the same parcel as an owner's principle place of residence, up to 360 days a year when that use goes without two serious, proven complaints per year. And further, that any residence under the RSO be allowed to apply for an exemption from the STR ban if the owner can prove that for any three-month period the residence rented for more than \$5,000 per month.

Thank you for your consideration of this request.

Sincerely,

*Mark Ryavec*

Mark Ryavec

Former Legislative Analyst, Office of the Chief Legislative Analyst, City of Los Angeles

Former Chief Deputy Assessor, County of Los Angeles

MA, Urban Studies, Occidental College

First Runner-Up, Council District 11 Election, 2017



Westside  
Regional  
Alliance of  
Councils

[westsidecouncils.com](http://westsidecouncils.com)

Bel Air-Beverly Crest Neighborhood Council  
Brentwood Community Council  
Del Rey Neighborhood Council  
Mar Vista Community Council  
Neighborhood Council of Westchester/Playa  
Pacific Palisades Community Council

Palms Neighborhood Council  
South Robertson Neighborhoods Council  
Venice Neighborhood Council  
West LA-Sawtelle Neighborhood Council  
Westside Neighborhood Council  
Westwood Community Council  
Westwood Neighborhood Council

5 February 2018

Hon. Jose Huizar, Chair; Hon. Marqueece Harris-Dawson, Mitchell Englander, Curren Price, Jr., and Bob Blumenfield,  
Members, Planning & Land Use Management (PLUM) Committee  
200 North Spring Street  
Los Angeles, CA 90012

Re: *CF-1635-S2 – Proposed Home Sharing (Short Term Rentals) Ordinance;*  
*Item 3 on 2/6/18 PLUM Committee meeting agenda*

Dear Chair Huizar and Members of the PLUM Committee:

The Westside Regional Alliance of Councils (WRAC) is a coalition of all 13 neighborhood and community councils in Council Districts 5 and 11. A supermajority of WRAC members (10 of 13) supports adoption of certain “essential provisions” in connection with any proposed City ordinance allowing short term rentals in presently prohibited zones, including:

- 1) **Establishment of an annual cap on the number of nights per host for short term rentals;** although WRAC members have taken varying positions on the actual number for the annual cap, we support the basic principle that such a cap should apply to *all hosts*; i.e., provision should not be made, via a CUP or other process, for individual hosts to receive permission to exceed the established annual cap.
- 2) **Requirement of proof of primary residence plus liability insurance for this specific use** (examples of proof of primary residence shall include utility bill, driver license and the like); WRAC members do not support “self-certification” of residence, which the City Planning Dept. has concluded may lead to “significant fraud and abuse” (CPC “Report Back” to PLUM Committee, 1/11/18, p. 7).
- 3) **Requirement that short term rental TOT receipts NOT go into the General Fund,** but instead be used to create a special enforcement/compliance unit specific to enforcing regulation of short term rentals.

To the extent the PLUM Committee is considering amendments to the currently proposed ordinance that might be contrary to our position on these essential provisions as indicated above, WRAC expresses its strong opposition. We strongly oppose any amendments that would allow individual hosts to: exceed the annual cap; or self-certify residency. We also oppose any diversion of TOT receipts to the General Fund or any diversion of the currently proposed allocation for enforcement of this ordinance.

Thank you for your consideration.

Sincerely,

Doug Fitzsimmons  
Chair, Westside Regional Alliance of Councils  
President, South Robertson Neighborhoods Council

cc:

Hon. Paul Koretz, Councilmember, CD 5

Hon. Mike Bonin, Councilmember, CD 11

Hon. Herb Wesson, Council President, CD 10

Hon. David Ryu, Councilmember, CD 4

Zina Cheng, Legislative Assistant, **w/request for filing in CF 14-1635-S2**



## PACIFIC PALISADES COMMUNITY COUNCIL

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September 11, 2017

Hon. Samantha Millman, President; Vahid Khorsand, Vice-President; and Members  
Los Angeles City Planning Commission  
Department of City Planning  
200 N. Spring Street  
Los Angeles, CA 90012

Via email to: [cpc@lacity.org](mailto:cpc@lacity.org)

**Re: CPC-2016-1243-CA; ENV-2016-1277-ND (proposed Home-Sharing Ordinance);**  
**Hearing: 9/13 -- OPPOSE IN PART**

Dear President Millman, Vice-President Khorsand and Members of the City Planning Commission:

### **Introduction**

Pacific Palisades Community Council (PPCC) is the most broad-based community organization in Pacific Palisades and has been the voice of the community since 1973. PPCC is one of the oldest continuously operating councils of its type in Los Angeles and served as a model for many current neighborhood councils. PPCC holds open, public elections for 9 board seats; conducts open, public board meetings; and serves the same function as a neighborhood council: to provide a forum for the discussion of issues and to advise government on matters of community concern.

PPCC is also a respected member of the Westside Regional Alliance of Councils (WRAC), an alliance of all 13 neighborhood and community councils on the Westside of Los Angeles.

As acknowledged by Councilmember Mike Bonin: “[PPCC’s] role is identical to that of a certified neighborhood council . . . They provide the same crucial function in vetting community issues and providing a respected and open forum for evaluating development proposals and land use matters.” [Motion in Council File 13-1625]

### **PPCC Position**

PPCC has long opposed legalization of home-sharing (short term rental activity) in all residential zones. However, we have also taken the position that if legalization is to occur certain key provisions must be included.

The current version of the proposed Home-Sharing Ordinance (the Ordinance) contains some but not all of the provisions that PPCC supports and requires. For example, we support provisions to require the rental unit to be the host’s primary residence (and also to require proof of residence and liability insurance for the activity); to require hosts to register and obtain a City permit (with notice to property

owners within 500 ft.); to impose an annual cap on home-sharing (but no more than 90 days); and to establish a trust fund for TOT receipts, to be used for enforcement.

PPCC opposes establishing an annual home-sharing cap of 120 days. In addition, PPCC, along with a supermajority of WRAC members (10 of 13), opposes any process to allow for extended home-sharing. PPCC has also stated that advance notice to property owners or residents within at least 250 ft. must be required for any extension of the annual cap, and therefore opposes the provisions calling for notice of extended home-sharing only to “adjoining and abutting” property owners and occupants.

Finally, PPCC supports the establishment of a private right of action by adversely affected residents in the community, and therefore requests that the Ordinance provide for a private right of action.

See PPCC position letters and resolutions dated September 28, 2015, October 25, 2015, June 16, 2017, February 22, 2018 and April 30, 2018 at <http://pacpalicc.org/index.php/organizations/>. See also WRAC letter of February 5, 2018 at [http://pacpalicc.org/wp-content/uploads/2018/02/WRACRecommendation\\_ShortTermRentalsOrdinance\\_020518.pdf](http://pacpalicc.org/wp-content/uploads/2018/02/WRACRecommendation_ShortTermRentalsOrdinance_020518.pdf).

PPCC respectfully urges that the Ordinance be further revised consistent with the positions held by PPCC and WRAC, as set forth above.

Sincerely,

George Wolfberg  
Chair  
Pacific Palisades Community Council

cc: Hon. Mike Bonin, Councilmember, Council District 11 -- [mike.bonin@lacity.org](mailto:mike.bonin@lacity.org).



James Williams &lt;james.k.williams@lacity.org&gt;

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**re: Home Sharing Ordinance: CF 14-1635-S2/CPC-2016-1243-CA**

1 message

**Rebecca Lucas** <desertliving@ymail.com>

Wed, Aug 29, 2018 at 10:45 AM

To: "CPC@lacity.org" &lt;CPC@lacity.org&gt;

Dear City Planning Commission of Los Angeles,

I am writing to you today about the proposed home-sharing ordinance to be heard on September 13. We need these regulations NOW – illegal short term rentals are decimating neighborhoods and taking away critical housing units. I support an ordinance which includes allowing home-sharing only in one's primary residence, not in RSO units, includes a 90-120 day CAP, requires hosts to register with the city, pays TOT and requires platform accountability. This is critical to protect housing, protect tenants, and protect communities. TORS should not be used as a vehicle for illegal conversions of residential units for existing and new units. Developers that receive a TORS entitlement but that build residential units instead, should not be allowed to later convert the units into Short-term rentals. Please pass this ordinance ASAP to preserve the enjoyment of Los Angeles neighborhoods for residents.

Sincerely,

Rebecca and Robert Lucas

Presently residents of Palm Desert CA ( where the city listened to residents and the new ordinance will no longer allow STRs with absentee owners in our R-1, R-2 residential neighborhoods ). Soon to be residents of Los Angeles.

# DAY OF HEARING SUBMISSIONS

The following submissions by the public are in compliance with the Commission Rules and Operating Procedures (ROPs), Rule 4.3c. Please note that “compliance” means that the submission complies with deadline, delivery method (hard copy and/or electronic) AND the number of copies. The Commission’s ROPs can be accessed at <http://planning.lacity.org>, by selecting “Commissions & Hearings” and selecting the specific Commission.

All submissions distributed to the Commission during the Commission Meeting are included in this file.

Material which does not comply with the submission rules is not distributed to the Commission.

## ENABLE BOOKMARKS ONLINE:

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If you are using Chrome, the bookmarks are on the upper right-side of the screen. If you do not want to use the bookmarks, simply scroll through the file.

If you have any questions, please contact the Commission Office at (213) 978-1300.