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

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

Mon, Jun 8, 2020 at 3:58 PM

Dear Mr. Como,

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

Best,

Richad Adkins
President
Hollywood Heritage

 **HH Response 6220 W Yucca ENV-2014-4706-EIR 6.8.20.pdf**
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**Re: 6220 West Yucca Project; 1760 North Argyle Avenue; 6210-6224 West Yucca Street; and 1765, 1771, 1777, and 1779 North Vista Del Mar Avenue
ENV-2014-4706-EIR**

Dear Mr. Como,

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

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

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

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

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

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

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

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

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

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

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

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

Our comments on the DEIR are as follows:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

pattern. (See maps in Appx. 1). Building 1 of this project is 20 stories. Hotel Argyle and Yucca Street Condos are each 16 stories high. The Hollywood Center Project would add a 46 building on the East project site, between Vine and Argyle.

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

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

- Conflicts with existing land use plans: The DEIR omits necessary background and clear calculations that show genuine conflicts of the proposed Project with multiple land use plans. The DEIR cherry-picks a few “goals” on in Chapter IV, drawing a false impression of compliance. CEQA requires open disclosure of specific conflicts of the Project with these Plans in their entirety, especially those adopted for the purpose of avoiding mitigating environmental effect. As such the DEIR is deceptive, noncompliant with CEQA, requires recirculation, and incomplete.
- Change “D” Conditions to triple development size: The proposed Project is correctly stated to be entitled to FAR of 2 (new buildings are allowed to be 2x the land area owned)- - for all the land covered by Building 1. Currently the land is commercially zoned for the west 19,679 sf parcel; and residentially zoned for the center 19,730 sf parcel. The “ask” is for removing the “D” (development limitation) placed by zoning ordinance to synch development to sustainable levels in Hollywood; to step buildings down between the commercial and low density residential area; and to stop any higher density unless Redevelopment restrictions to mitigate traffic and instill acceptable urban design were met.
- Affordable housing: The project proposes demolition of 44 rent-stabilized residential units. It proposes to offer current tenants units in the new building at old rents; carry costs during construction for dislocated tenants; and reimpose rent control (RSO) on those units, plus the other 66 units which will start at market rents. This is good. However, this is not a guarantee of any affordability. The Redevelopment Plan ties requests for the FAR increase such as requested herein to public benefits and affordable housing—but this Project doesn’t provide.
- R4 Zone doesn’t allow Hotel: The Zone Change proposed by the Project changes the C4 zone (intended to limit less desirable raucous uses like pool halls) to the LESS restrictive C2 zone on the West parcel. The residential R4-2D zone on the Center parcel (implemented in the Community Plan and AB 283 zoning to provide a buffer between dense commercial and low density historic district) does not allow a Hotel, so a Zone Change is being requested. C2 zoning reduces the allowed housing units, but there is no calculation and this isn’t disclosed. The DEIR omits clear discussion and quantification, and must be recirculated.

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

Current Land Area and Development Allowable by Zoning:

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

Sources: LA City ZIMAS for lot areas; Developer Pre-dedication and post dedication project figures from DEIR

** DEIR Use of LAMC Sec 12.22.A.18 for Hotel use cannot be applied on R4 portion of land, owing to zoning restrictions and

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

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

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

The FEIR must address accurately and transparently the following:

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

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

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

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

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

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

FEIR must address accurately and transparently the following:

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

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

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

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

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

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

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

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

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

DEIR must be recirculated. FEIR should transparently disclose developer responsibilities

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

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

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

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

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

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

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

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

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

Summary

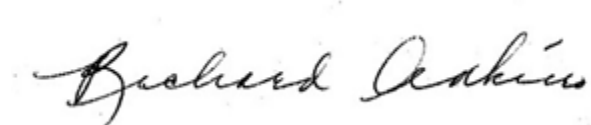
For the last decade, Hollywood Heritage has worked tirelessly with City officials and departments to craft land use policies which protect historic resources. Three years ago, we asked the Council office to support us in a series of proposals designed to meet those goals and institutionalize policies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

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

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

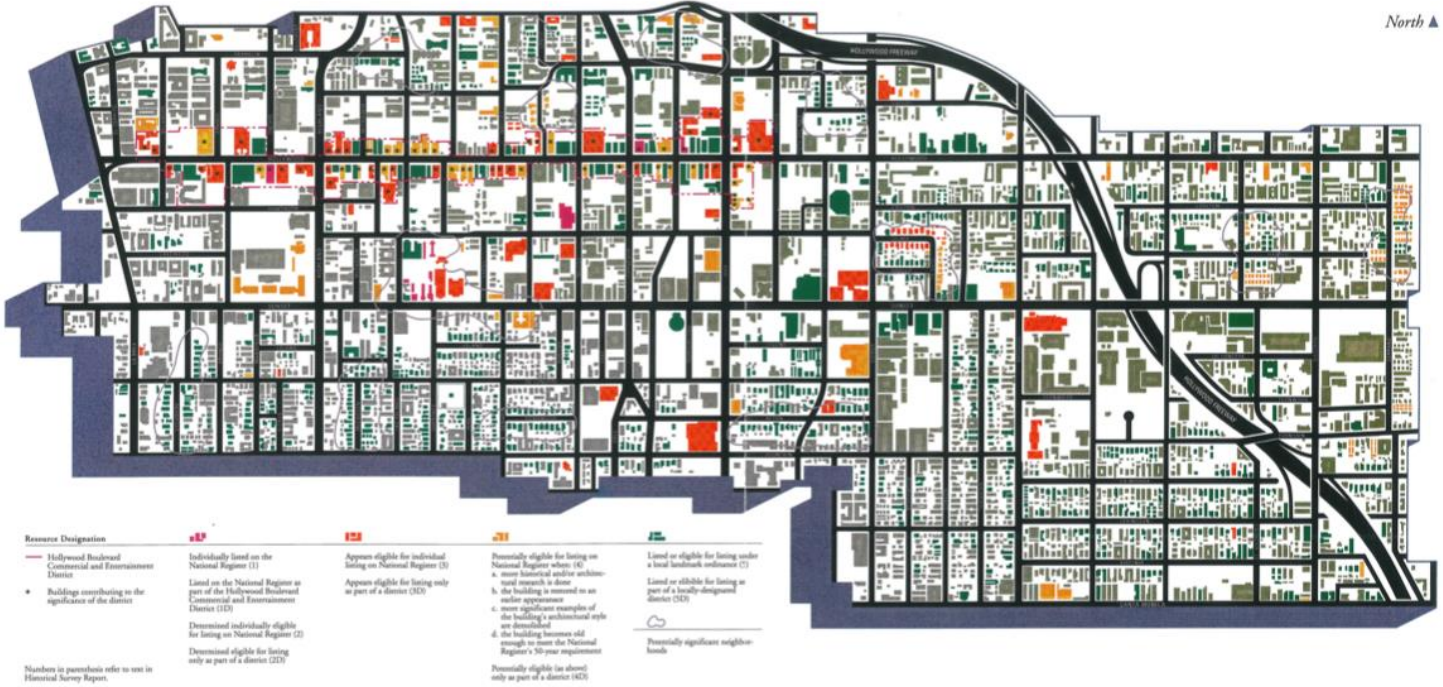
Clearly, the City has not chosen to implement any of these recommendations. This proposed project is evidence that little guidance is given to developers when they submit a project that demolishes historic affordable/ workforce housing, impacts and erodes the integrity of the CA register district , and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

Sincerely,



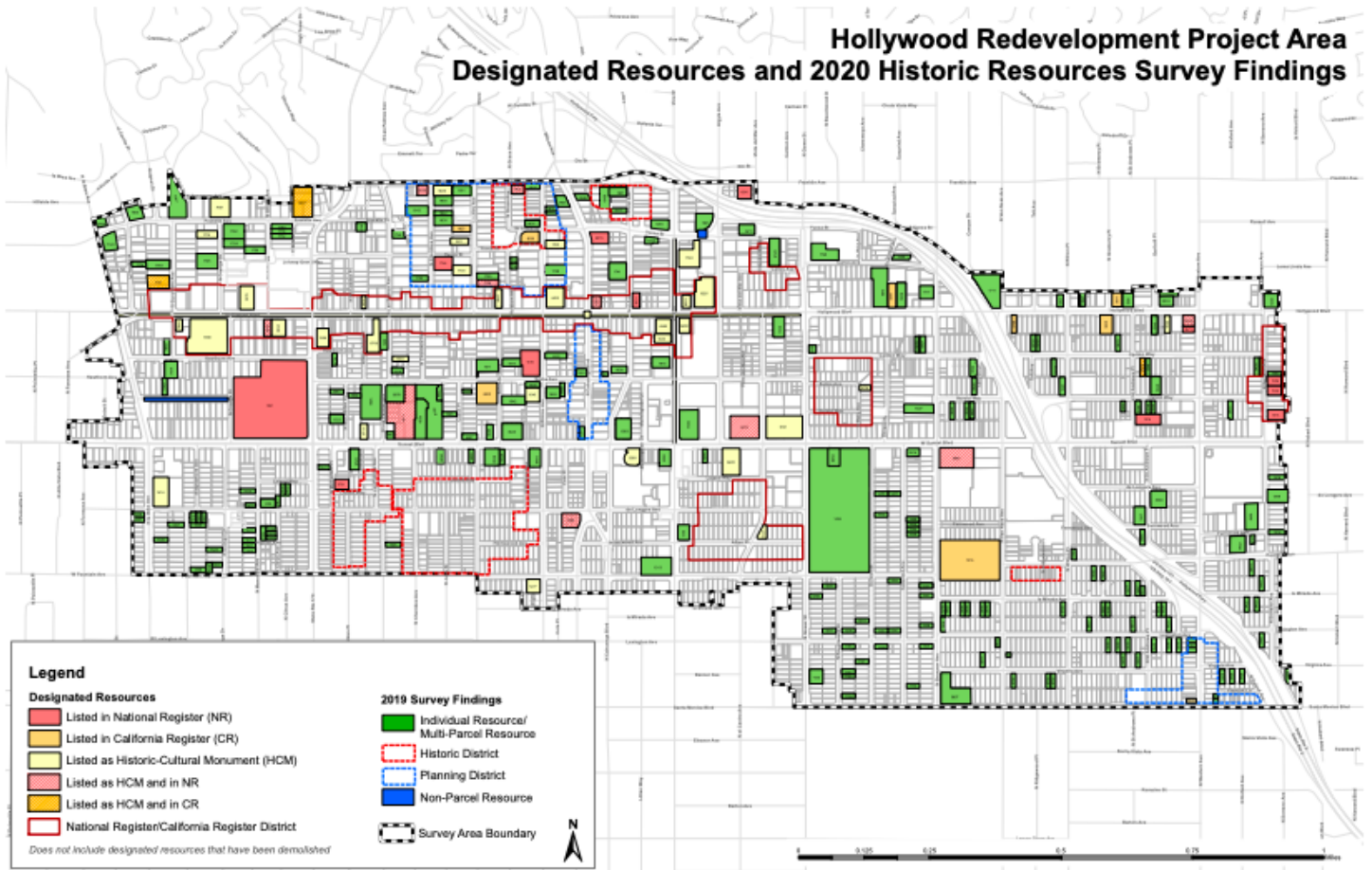
Richard Adkins
President, Hollywood Heritage, Inc.

Appendix I: Maps (3)

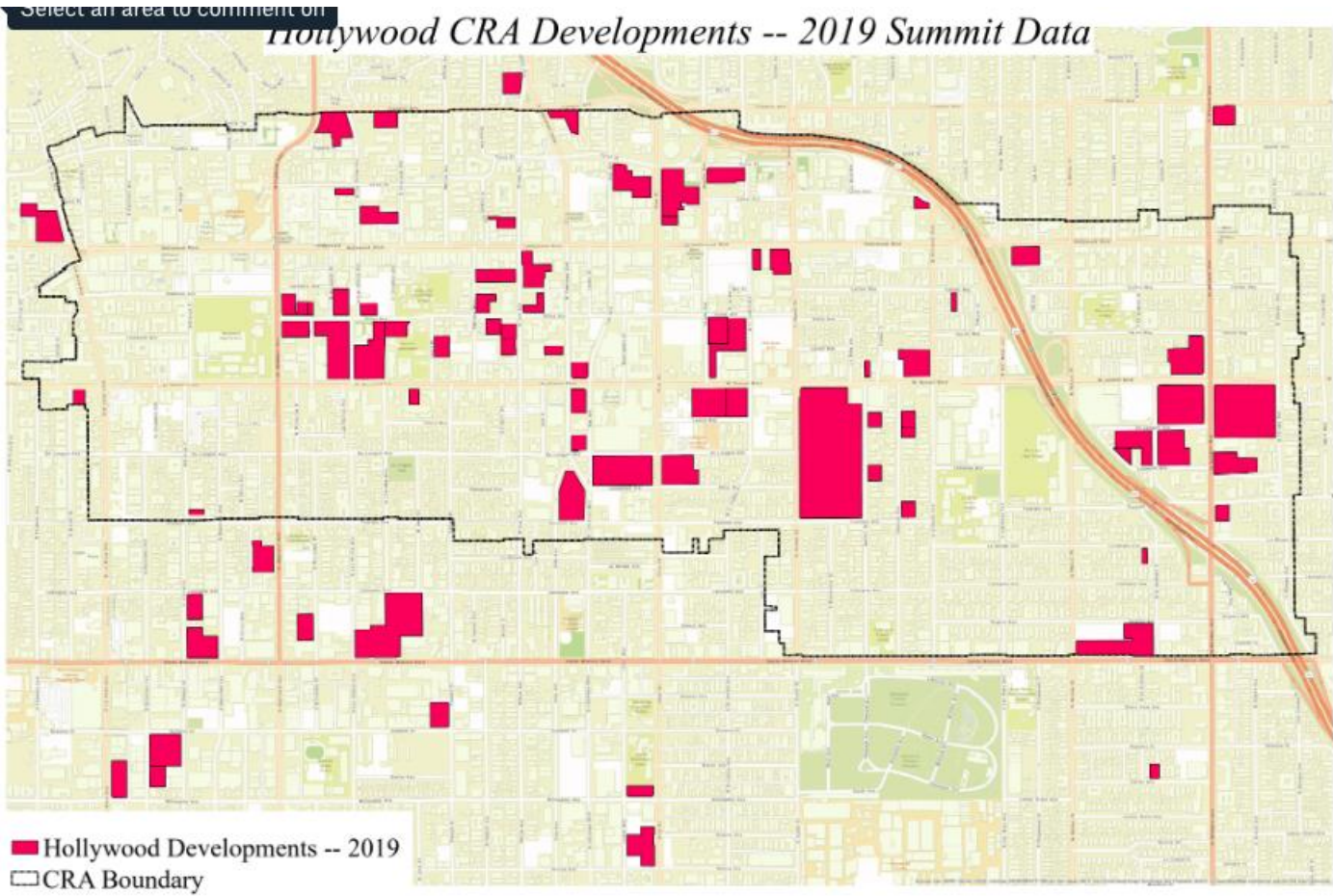


CRA/LA Historic Resources Map

Hollywood Redevelopment Project Area Designated Resources and 2020 Historic Resources Survey Findings



2020 ARG Historic Resources Survey Map



2019 Hollywood Heritage Development Map

Appendix 2: Conformance with 1993 Design Guidelines

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

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