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Sent time: 05/28/2020 04:32:16 PM
To: mindy.nguyen@lacity.org
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Subject: DEIR ENV-2018-2116 EIR 20180E1002Hollywood Center Project



May 28, 2020
2700 N. Beachwood Drive
Hollywoodland, CA. 90068

RE: Hollywoodland Homeowners Association response to the DEIR ENV-2018-2116 EIR 20180E1002 Hollywood Center Project

Dear Ms. Nguyen:

Thank you for the opportunity to comment on the Hollywood Center Project despite the department's inability to extend the comment timeline. This is an undertaking for any volunteer lay person, reading, reviewing, synthesizing, and writing on more than 4,000 pages in 45 days. Paid staff would have a difficult time acting under this timeframe. However, since I have an obligation to my historic neighborhood and a commitment to the other property owners in my city, I feel it is appropriate for me to respond and communicate concerns.

Hollywoodland, Tract 6450

I am writing on behalf of Hollywoodland Homeowners Association who's purpose (since 1942) has been to promote safety and advocate protection for Hollywoodland. Hollywoodland tract 6450 represents 190 acres of residential property consisting of 575 homes, a small commercial village, horse stables (accessed through an easement road) and 440 plus acres of open space given to the city's Griffith Park in 1944. County maps show Hollywoodland residential surrounded by SEA (Significant Ecological Area) and VSFHZ (Very Severe Fire Hazard Zone). Three sides, 80% of our perimeter, are surrounded by park land. Our 1923 substandard, narrow hillside streets (generally without sidewalks) transport us to the flatland roadway grids of Hollywood proper and the 101 freeway.

Traffic and the marketing of tourism created through densification of commercial sections of Hollywood have a negative effect on hillside communities particularly in terms of safety issues relating to traffic, noise, fire, ingress egress and emergency access.

General comments: Environment, Character

Definition ENVIRONMENT: The external factors and forces surrounding and affecting an organism, person or population. Although the DEIR seems expertly written and covers many details it misses real living, human use issues (*persons*) as well as issues that make our city (*population*) unique and special. The DEIR ignores the big picture in three areas:

1. Human element, how the structure will be received and used by the community
2. Aesthetics relating to composition (scale and massing) relative to existing buildings, street configurations, etc.
3. Reinforcing the primary visual character of Los Angeles built structure: horizontal versus vertical siting of structures.

Today the City is in a visual vacuum only seeing monetary revenues from projects, ignoring the unique topography landscape that demands horizontal siting.

Current Events Affecting the Future

May 24, 2020 Los Angeles Times discussed "dense Park LaBrea" and how it has been affected by the current pandemic. Park LaBrea has 4255 living units on 160 acres. Most of the development is self-contained relative to street traffic with 18 units reaching 13 stories and 32 units in 2 story attached apartment configurations. ***The ratio: 26.5 dwelling units per acre.***

The proposed Hollywood Center Project is not a self-contained, isolated space. The proposed height is 46 stories, more than three times higher than "pandemic" oriented Park LaBrea. It is located one block adjacent to a busy freeway offramp that filters massive

amounts of traffic into the city, Hollywood and adjacent residential areas. Hollywood Center Project is 1005 living units on 4.46 acres of land with a **ratio of 225 dwelling units per acre**.

Just considering this data one must ask: What is going on? Why this lack of livability in housing? What are the forces behind this? Will traffic change after the pandemic? Will behavior patterns change? Will living options change? Will people want to ascend/descend 46 stories in an earthquake, fire, pandemic? Who are the New York LLC's really building this for?

And while you consider methods and ways to approve this project, I would like to reintroduce our City Charter that binds responsible actions to its citizens:

City Charter Article 1 corporation of powers

Sec. 103. Delivery of Services.

*Every City office and department, and every City official and employee, is expected to perform their functions with diligence and dedication on behalf of the **people of the City of Los Angeles**. In the delivery of City services and in the performance of its tasks, the government shall endeavor to perform at the highest levels of achievement, including efficiency, accessibility, accountability, quality, use of technologically advanced methods, and responsiveness to public concerns within budgetary limitations. Every analysis and review of the performance of the government and its officers shall seek to ascertain whether these high standards are being met, and if not, shall recommend methods of improvement.*

To the planning staff I ask this: What is the character of Hollywood's commercial/residential area? Is the physical, built character of Los Angeles vertical or horizontal? Why is character important in all new structures? How does physical character in buildings reflect environmental elements in a project like the Hollywood Center?

DEIR Introduction page 1

"A picture tells a thousand words". When I clicked on Planning's Hollywood Center Project, it told this about the City and their disposition regarding development:

To the far left of the photo is an image of the Mayor in a hard hat addressing about twenty hard hat construction workers (at probably one of the many Hollywood construction sites). Translation: As mayor, he manages and approves everything in order to bring in tax revenues; this is what matters, this is what counts, this is the end result he wants and the process is just that, a process and that "process" will not delay or prevent this project.

The proposed project area is a few blocks away of many of CD13's unsheltered constituents who reside on the public sidewalk, defecate, urinate, consume drugs and have sexual encounters, all on public property (Gower underpass, Vine Street offramp). Adjacent to these unsheltered citizens is a temporary high school and Hollywood Presbyterian's nursery pre-school (the future citizens of our city). Note that today, 5/27/2020, there was a cleanup, however there is a behavior pattern that in two weeks that visual will reappear).

In a rush to get this document out your department claims various libraries have copies of the plan. Although there may be copies in the library cue, the libraries have been closed since the issuance of this DEIR on April 15. Access through this option is not functional.

While the Hollywood Center project gets a "fast pass" I would like to state (in the public record) the Hollywoodland design guide (a document to accompany the Hollywoodland Specific Plan) has languished in the Planning Department for almost a year. We vote, we own property, we build character and add substance to the City, yet we are the lowest in your to do list cue?

With Planning's image of our mayor (in your Hollywood Center Center document), as well as other issues I have expressed, please review my comments. Please note them as more than just "process", but actual concerns that must be addressed.

DEIR Document Executive Summary /Comments from the Document Details

Draft EIR Sections

III. Environmental settings page 1-18

TABLE III-1, page 6*

largest 952 DU, 6200 W. Hollywood

6201 W. Sunset 731 DU

6701 W. Sunset Blvd. 760 DU, 308 hotel rooms

5460 W. Sunset 735 DU

Observation/question: The proposed New York City funded project is larger and taller than any existing building in the commercial section of Hollywood. Why and how does that affect the community character?

*please note search on Zimas provided very odd information relative to these addresses.

IV. A. Aesthetics
Mitigation measures

Design features and mitigations measures

Threshold (c)

This project does affect the visual character of the Hollywood Community Plan area. The excessive height of 44 feet, the massing of the project, overwhelms all existing area built projects. The vertical context of the project rejects the original linear visual evident in earlier Hollywood and Los Angeles. Hollywood Center would be the tallest building in commercial Hollywood. There is not a clear reason why it needs to be this height. There is not a clear reason why this structure from a New York LLC has an ability to dictate and change community character. Please clarify why this height has been approved.

Please note the surrounding area description has been visually handpicked and has excluded the obvious human elements such as CD13 unsheltered constituents. They have a permanent placement on the sidewalks and their presence should be considered in this review.

Design features and mitigations measures

Threshold (d)

Hillside property and public open space are negatively affected by light source and glare. When considering this project, the DEIR only considered the immediate area. However, the effects of light and noise negatively impact the hillside residents. Tall structures like this alter wind patterns while the increased number of illuminates on/in all new high-rise buildings creates negative ambient light affecting the environmental open-space associated with micro-climate plant life and animal habitat. New York LLC's probably do not understand this aspect of Los Angeles hillside living. Please investigate further.

IV Noise (a) This data collection is selective in its measurement and reference to sources. The data is not collected relative to the noise "bounce" from varying geography. Sound has an affect from high-rise buildings in conjunction to freeways, autos etc. The data is viewed in as a "flat plane, grid" not in configured elevation changes that creates noise and light bounce. Please include these environmental concerns and review.

The city's local noise elements are not met with this project because noise issues have been viewed in a limited scope. Because of elevations, hard surfaces, building, wall noise "bounce", the noise translates further up the hillside canyons. Additional measurements must be implemented.

There are significant concerns regarding rooftop elements that allow gatherings of crowds and amplified music. These uses should be prohibited. Again, because of hillside elevations and manmade structures, noise is projected into the hills.

IV. A page 23 Please define "dense urbanized character".

Figure IV. A8 page 35 The images clearly show the massing change from horizontal to vertical density. The purpose is not aesthetics, but to maximize profits. Structures such as the Center Project compromise the visual character of Hollywood creating a Wuhan, Dubai, NYC look. Is that what the Hollywood community wants to see and live in? Is this what visitors come for Wuhan, Dubai, NYC? Los Angeles the clone of NYC? Reduction of height should be considered.

Figure IV A. 11 Simulated image shows incompatibility in design and scale of the proposed project. Please ask the developer to define the community character of Hollywood to better understand the project and our city. A mitigation measure should be reduced height and units.

TABLE IV 1-20 Off-site Traffic Noise Impacts You have only measured immediate adjacent 6 block area. Hollywoodland and its adjacent hillside neighbors are directly affected 1.5 miles north of proposed project. Please initiate a noise study under all atmospheric conditions to understand this effect.

Regarding historical preservation relative to the Walk of Fame.

Please note the Walk of Fame is a private entity on public space. It does not generate any monetary benefits to the public, only to the Chamber.

Page 31 Please define "revitalize". Please include information about the significant numbers of unsheltered encampments on the streets adjacent to the proposed project. This visual element and how their displacement will be affected needs to be included as an environmental issue.

Table ES-1

IV.K.4 Parks and Recreation

Threshold (b) The more living units allowed the more physical and safety issues are created in hillside neighborhoods such as ours. The closest legal, authorized entry into Griffith Park is at Canyon (Bronson), yet flatlanders, the tourist trade and all their added vans, Ubers etc. manage to circumvent regulations and breech through illegal, unofficial entrances and vista sites. RAP needs to be clear with their process and their protections of eco sensitive areas like tract 6450. Please explain how tract 6450 SEA will be protected.

IV.L Transportation. Consider self-containing all the ingress and egress of this project by adding more open space acreage similar to more livable like Park LaBrea (see earlier discussion). By densifying this project, making it the tallest with more living units than any other Hollywood apartment complex you are creating the LLC's developers' image of New York not the image/character of Los Angeles. Please understand the historical building elements that work in densification like the Park LaBrea complex.

Threshold (d) Would the project result in inadequate emergency access? Yes, this type of density brings more autos from residents. The project is not self-contained. Franklin Ave is one block from the project. This collector street is the main artery for all hillside communities north of Franklin. When this is gridlocked, emergency vehicles are impeded. Threshold for safety should include emergency evacuation plans for hillside communities and an explanation of how emergency services will meet the 8-minute average response time.

IV.N.0 Energy conservation and infrastructure

This project would result in significant environmental impact due to wasteful or unnecessary consumption of energy resources during operation. Proper design should eliminate air-conditioning in all living units. Please consider opting for open windows that allow breezes rather than expensive, polluting air condition units. These are huge pollutants to the environment. Again, this is not New York City.

Historic Resources provided numerous pages of images with these words on the top : "confidential draft for internal review only". Please explain this.

Respectfully,

Christine O'Brien
Hollywoodland Homeowners
Hollywoodland Gifted Park