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**Subject:** Comments to the Hollywood Center Project  
**Attachments:** Ledding Comments on Hollywood Center.pdf

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Please note the attached letter regarding the Hollywood Center Project DEIR.

Sincerely,  
Mary Ledding

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May 31, 2020

Mindy Nguyen  
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Re: Comments on Hollywood Center Project DEIR  
Case Number ENV-2018-2116-EIR  
State Clearinghouse Number 2018051002

Dear Ms. Nguyen and City Officials:

Please include the following in the Public Comments and concerns about this massive project.

1. I live in the Hollywood Dell, which is part of the neighborhood community the Project will affect. I object to the size and scope of the Project. For the City to approve the construction of two towers that are over 3 times the height of the Capitol Records Building and generally twice as tall as the Related Projects surrounding it shows a total lack of concern for the historic and architectural environment and the obligation to maintain the prevailing scale and character. The DEIR finds "no conflict" with policy 3.2.4 which requires developments to maintain the prevailing scale and character of the area and simply says the height and intensity is consistent with the building "trend in Hollywood". Where are there any buildings in the neighborhood surrounding the Project that are significantly over 20 stories (being the general height of Related Projects that have been approved)? Where in CEQA is a development permitted to comply with "trends" rather than the stated policies of the Framework element?
2. The Project is asking for greater height and density in return for, among other things, the implementation of a TDM Plan to promote public transit utilization. Where are the specifics of such TDM Plan? The recent report on public ridership by the Regional Ridership Improvement Task Force states "ridership is declining in Los Angeles County" and cites "deep recessions then rising incomes, increasing auto ownership, steep jumps in housing prices, and the advent of new mobility services potentially changing how and when people choose to ride". The report, prepared by the same consultants who reported a rosy look for public transit usage promoted by the Project, suggests unproven strategies which the Project embraces. What proof is offered that the TDM Plan will increase ridership of public transit and not increase auto ownership? Similarly, given the

- CoVid 19 pandemic, what impact will the pandemic have on the number of autos and consequent parking spaces, impact on traffic, air quality, and noise set forth in the DEIR?
3. The DEIR notes significant unavoidable impacts to cultural resources, including the Pantages Theatre, Avalon Hollywood, and certain Art Deco adjoining buildings. These are significant irreplaceable historic buildings. In addition to the Project, the DEIR notes that the effect of nearby construction together with the Project will be cumulatively significant and unavoidable. How can the City sacrifice the future of these unique historical and cultural landmarks in return for building a massively over-sized Project that is not consistent with the neighborhood skyline and will negatively impact so many other elements of the framework element?
  4. The DEIR repeatedly mentions the addition of over 30,000 square feet of retail/commercial space and asks for 12 liquor licenses. Why does the DEIR not mention the addition of grocery stores, personal services, and other daily-needs types of stores? How does the addition of solely retail/commercial/liquor licensed businesses provide for the stability and enhancement of multi-family residential neighborhoods in accordance with Objective 3.7 of the framework element?
  5. As a general matter, the Project DEIR has been prepared with the intent, and the blessing of the city and state, that it provide density and that residents and occupants will predominantly use public transit and reduce the use of private automobiles. However, the occurrence of the Covid 19 pandemic has caused permanent change in the minds of the public. The virus is known to have been widely spread on crowded public transit vehicles in New York City and elsewhere. Before the pandemic Los Angeles County use of public transit was documented to be continuing to decline by the Regional Ridership Improvement Task Force. The virus will further reduce ridership. Has the effect of Covid 19 and the likely permanent societal changes been evaluated in all of the applicable areas of potential impact, including traffic, use of private autos, use of ride-services, need for parking spaces, change in economic climate, decline in attendance at restaurants and bars, decline in attendance at public venues such as the proposed public performance space and other public spaces in the Project?
  6. It is publicly known that the developers of the earlier version of the Project (the Millennium Hollywood Project) also built the Millennium Towers in San Francisco, which were found to have sunk and started to lean. Substantial litigation is still pending there, including a case filed by the City of San Francisco at great cost to the taxpayers. Has the DEIR confirmed that the geological report for the Project was not done by the same experts for San Francisco Millennium? How does the DEIR assure the

- public that the massive towers of the Project will not result in geological errors and expose the City and its taxpayers to significant litigation costs?
7. The DEIR wrongly states that the Project is not within a quarter of a mile (1,320 ft) of a school. In fact, Delaney Fine Arts Preschool is within 602 ft of the Project and Hollywood Presbyterian Children's Center and Preschool is within 943 ft of the Project. And Cheremoya Avenue Public school is within 1,437 ft of the Project. Has the Project been evaluated as to the impact on the children in these schools caused by the construction and operation of the Project and each of its Alternatives (including but not limited to haul routes, increased traffic and traffic safety concerns, air pollution, and hazardous waste)?
  8. The Project proposes 133 senior units but does not state the square footage or whether 1- or 2-bedroom units. The Project is asking the City for numerous waivers to city zoning return for building the absolute minimum percentage of senior/affordable housing (11%). Is allowance made in these units for the customary need of a caregiver for seniors? How does the size of these senior units (square footage, number of bedrooms) compare to the size of other senior housing in the area and how does it compare to the size of the supportable housing the City has been building for the homeless? Seniors should receive at least the same amount of living space that public tax dollars are paying for the homeless affordable housing.
  9. From a design and aesthetic standpoint, the plans for the senior housing units being proposed are strikingly similar to cell blocks from Eastern Europe and the failed "projects" of the Eastern United States. Why are the senior units so boxy and without any design grace? How are such boxy buildings consistent with Policy 3.2.4 of the framework element which requires development to maintain the prevailing character of the city's stable residential neighborhoods? There are no cell -block living structures surrounding the Project.
  10. Under State CEQA Guidelines a project that physically divides an established community has a significant impact related to land use and planning. The Hollywood Dell neighborhood is part of the community of Hollywood. Residents of the Dell have no commercial district other than those retail and grocery shopping locales to the south of the Project and must take the main southern streets of Argyle, Cahuenga and Vine to get to those shops and services. The building of the Project will significantly increase the traffic the Dell residents must encounter to reach the retail portion of our community and dividing it. Why was no review made of the impact of the Project in dividing the Dell or other surrounding neighborhoods from the Hollywood community?

11. The DEIR avoids mentioning the height of the historical Capitol Records building which appears to be only 13 stories from examination of the Project illustrations. The Project and all Alternatives which actually build something dwarf this historic building. The developers are requesting a waiver from the City to applicable height limits in return for building the absolute minimum of cell-block units for seniors - 11%. That in itself is a horrible bargain, but even worse is the monumental dwarfing of Hollywood's most iconic building. The Project is triple the size of Capitol Records. Alternatives #3, #4, #5, #6, #7, and #8 all dwarf it as well - Alternative #8 being the most egregious with a proposed 48 stories! Only Alternative #2 at 18 stories is anywhere similar to the Capitol Records building. In addition, all of the Related Projects close to the Project are permitted at about 20 stories. How can the City conclude that the Project - at 46 and 35 stories - maintains the prevailing scale of the neighborhood, in accordance with Policy 3.2.4 of the Framework Element? How did the approved Related Projects' evaluation of this Policy in obtaining their approvals compare to the evaluation of this important Policy in respect of the Project and why is there a different conclusion?
  
12. Policy 4.1.1 of the Framework element requires the City to accommodate an adequate supply of housing units by type and cost to meet projections. In response the DEIR simply repeats the proposed number of units it plans. Los Angeles is already facing a glut of empty expensive apartments which do nothing to provide affordable housing. Where is an analysis of the existing income levels of Hollywood residents and how the pricing of these "market-rate" units fit into citizen's income levels? How does the DEIR assure that the 872 market-rate units are actually at a rate that the community can afford? There is nothing about pricing in the DEIR.
  
13. The DEIR provides comparisons of Alternates and their various impacts on 56 different uses or features. At least three Alternatives - #2, #3, and #5 - all partially or fully meet all Project objectives yet offer lesser impacts on various uses or features. Alternative #2 offers 30 "Less" impacts, Alternative #3 offers 23 "Less" impacts, and Alternative #5 offers 20 "Less" impacts. All of Alternatives #2, #3, and #5 provide for a smaller scale Project with fewer stories than those being proposed. How can the City approve the Project which dwarfs surrounding buildings and Related Projects when Alternatives are available that partially or fully meet all of the Project objectives? Why is the proposed Project superior to those Alternatives in serving the needs of the community?
  
14. The DEIR acknowledges that if the Project and the Related Projects are to be built, by 2027, when the Project is completed and occupied, there will be an additional 18,064 students in the relevant area, and that all except Hollywood High School will experience significant overcrowding. The DEIR states that under Ca. Gov Code Sec. 65995 the payment of fees by

a developer mitigates to "less than significant" this impact. But that code section merely says additional fees cannot be charged beyond those set forth. It does not determine that a construction permitted by the City cannot be declined if the City determines there is a detrimental impact. Building a smaller Project, with fewer stories and fewer units, or with more senior housing would have a mitigating effect on the schooling deficit that the current Project will create. Why has the City not requested an evaluation of the effect that fewer stories or more senior housing on this Project would have on the projected deficit in student capacity? And why does the DEIR not project the deficit beyond the initial year (2027) when the Project would be completed, since students grow up and greater crowding would no doubt occur?

15. The developer is requesting 12 liquor licenses yet is touting this as a multi-family/ senior housing project. Ignoring the square footage dedicated to housing, the 30,176 square feet of commercial (retail and restaurants), results in one liquor license for every 2,500 square feet. If you further reduce for possible grocery and other non-restaurant space, the square footage anticipated to be utilized by liquor consumption is staggering. As a project touted as "multi-family" and "senior housing", how is the concentration of so many liquor vending locales consistent with the objective of developing neighborhood oriented retail space such as groceries, clothing, hair salons and the like?

I want to also note that the public was not given sufficient time to review this thousands-of-pages report given that only 15 days were allowed during a time the Covid-19 pandemic has shut down -and continues to shut down – access to the document, to officials who are cited in it, and to the ability for the community to publicly meet and discuss its broad impacts on our daily lives and the lives of future generations. Shame on the City and its officials. Especially at a time when City corruption is well-documented and City officials are admitting taking money from developers. You are trampling on public trust.

Sincerely,

Mary Ledding

Cc: Mayor Eric Garcetti ([mayor.garcetti@lacity.org](mailto:mayor.garcetti@lacity.org))  
Councilman Mitch O'Farrell ([councilmember.ofarrell@lacity.org](mailto:councilmember.ofarrell@lacity.org))  
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