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**Sent time:** 06/01/2020 02:09:09 PM  
**To:** Mindy.Nguyen@lacity.org  
**Cc:** Mitch O'Farrell <councilmember.ofarrell@lacity.org>; David Ryu <david.ryu@lacity.org>; alex@mcapus.com; vince.bertoni@lacity.org; mayor.garcetti@lacity.org; Ross Schwartz <ross.slaw@gmail.com>; eric.pascal@me.com; Shawn Bieber <sbieber@actionlife.com>  
**Subject:** Public Comment in Opposition to the Hollywood Center Project As Proposed Environmental Case: ENV-2018-2116-EIR State Clearinghouse No.: 2018051002  
**Attachments:** Broadway Hollywood EIR Impacts.docx Hollywood Center Project - Traffic Analysis.doc

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We are owners of 1 of the 96 units that make up the historic Broadway Hollywood Building. We oppose this project as it is proposed in the captioned DEIR. We support alternative 1 (no project), however, we could be in support of project alternative 2 (development under existing zoning) as identified in the DEIR with satisfactory additional mitigation measures and consideration given to the specific issues relating to our unit and the historic building as noted in the attached nine page letter and referenced traffic impact analysis letter. Our key concerns/issues relate to the following areas of the DEIR:

- ***Historic Cultural Resources threshold*** (a) Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5? – See attached letter.
- ***Aesthetics threshold*** (b) substantial adverse effect on a scenic vista. – See attached letter.
- ***Transportation and Traffic Mitigation plan/Project Design Features:*** The blocking of ingress/egress resulting from added pedestrian and vehicle traffic impacting the alley at 1645 Vine, the only vehicle entrance to Broadway Hollywood Building. – See attached letter(s).

Sincerely,

Lannette and Ross Schwartz  
Majestic Heights, LLC  
1645 Vine Street, Unit 411  
Hollywood, CA 90028

Sent from [Mail](#) for Windows 10

DRAFT EIR RESPONSE LETTER FOR DISCUSSION

May 31, 2020

TO: Department of City Planning  
City of Los Angeles  
221 North Figueroa Street, Suite 1350  
Los Angeles, CA 90012 □  
Attn: Mindy Nguyen, City Planner via Email: [Mindy.Nguyen@lacity.org](mailto:Mindy.Nguyen@lacity.org)

CC: See list below:

- Eric Garcetti, LA City Mayor ([mayor.garcetti@lacity.org](mailto:mayor.garcetti@lacity.org))
- Mitch O'Farrell, LA City Council Member District 13 ([councilmember.ofarrell@lacity.org](mailto:councilmember.ofarrell@lacity.org))
- Central Hollywood Neighborhood Council District ([alex@mcapus.com](mailto:alex@mcapus.com))
- David Ryu, LA City Council Member District 4 ([david.ryu@lacity.org](mailto:david.ryu@lacity.org))
- Vince Bertoni, Director of City Planning ([vince.bertoni@lacity.org](mailto:vince.bertoni@lacity.org))
- Kevin Keller, Officer of City Planning ([kevin.keller@lacity.org](mailto:kevin.keller@lacity.org))

RE: **Public Comment** Relating to the Hollywood Center Project Environmental Case:  
ENV-2018-2116-EIR State Clearinghouse No.: 2018051002

**Project Location:** 1720-1724, 1740-1768, 1745-1753, and 1770 North Vine Street; 1746-1764 North Ivar Avenue; 1733- 1741 North Argyle Avenue; 6236, 6270, and 6334 West Yucca Street, Los Angeles, CA 90028. Community Plan Area: Hollywood

**Stakeholder:** Broadway Hollywood Building Historic Resource unit owners: The building and sign are LA Historical-Cultural Monument and the building is a contributor to the Hollywood Blvd Commercial and Entertainment District with its primary entrance now located at 1645 Vine Street, at the corner of Hollywood Blvd and identified in the EIR as:

6300 Hollywood Boulevard (B.H. Dyas Department Store Building/Broadway Department Store), Map No. B.12 This nine-story steel frame and concrete building is located half a block south of the West Site, at the southwest corner of Hollywood Boulevard and Vine Street. Constructed in 1927, the Dyas Building was designed by Parkinson & Parkinson in Beaux Arts style. The building is rectangular in plan with a symmetrical fenestration pattern and Classical tripartite differentiation of ground floor, midsection, and crown. The ground floor and mezzanine levels feature Classically detailed pilasters and a central primary entrance framed by Classical columns. A cornice separates the ground-floor from the building's brick-clad mid-section. The building's top floors have a Corinthian colonnade topped with a bracketed cornice. There is an eight-story International Style addition to the western façade, and a neon roof sign spelling out "**THE BROADWAY HOLLYWOOD.**"

Dear Department of City Planning:

The above captioned Draft EIR conclusion statement of no significant impacts is flawed. The Project would result in significant irreversible direct and indirect impacts and avoidable operational impacts for the Broadway Hollywood Building including all of its 96 individual owners at the corner of Hollywood and Vine.

We, as owners of a unit within the historic Broadway Hollywood Building, oppose this project as it is proposed.

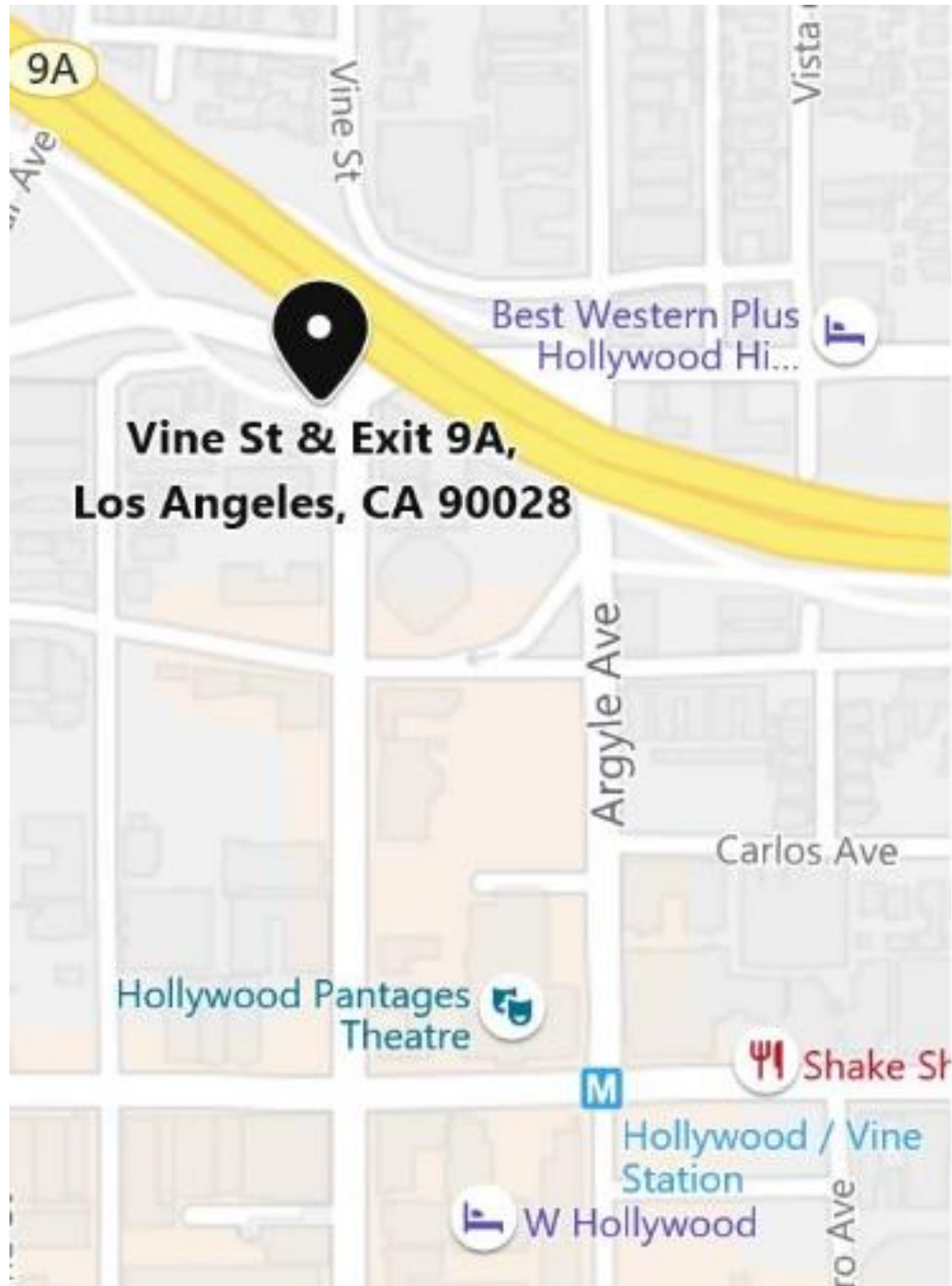
- I. Specifically, we request that the City as the Lead Agency provide threshold analysis for both direct and indirect impacts relating specifically to the following areas as they relate to the historic Broadway Hollywood building and rooftop neon sign located at 1645 Vine Street as outlined below:
  - a. ***Historic Cultural Resources threshold*** (a) Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?
  - b. ***Aesthetics threshold*** (b) substantial adverse effect on a scenic vista.
  - c. ***Transportation and Traffic Mitigation plan/Project Design Features***

Below are the **specific issues** related to above thresholds:

**Specific Issue: The Broadway Hollywood Building Existing/Simulated Views:** EIR Figure View below is from grade point of view from Broadway Hollywood Building location looking north. There are additional visual impacts to review:

View looking south from the 101 freeway (a scenic highway) vine Exit 9A. The view of the Historic Building and Sign are iconic and a significant historic view is from the 101 freeway and at the exit elevation as one enters through the Hollywood gateway into the historic district and the iconic corner of Hollywood and Vine. The analysis shows existing/proposed views that are slightly east or west in the photos and do not capture the view of the Broadway Hollywood Building that exists. **This project will irreversibly reduce the importance of the Broadway Hollywood building and historic neon rooftop sign as an individual historic feature and as a contributor to the aesthetic character of the Hollywood Boulevard Commercial and Entertainment District. This meets potential aesthetics impact with a *Threshold (a) Would the Project substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a City designated scenic highway?***

**In addition to the building itself, the Broadway Hollywood Neon Rooftop sign is a historic sign that is a historic feature of the building and can be seen from the scenic highway. Blocking this vista requires specific compliance review under this EIR analysis and for impacts to the Broadway Hollywood Rooftop Neon Sign under the Hollywood Signage Supplemental Use District.**



For context, and to capture the same line of sight from the opposite point of view from the top story of the Broadway Hollywood Building. **This project will directly impact and substantially block focal or panoramic views of and from this historic location.**



*c) The Transportation section* is missing a project design feature that would address impacts under Threshold (a) Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? And Threshold (d) Would the Project result in inadequate emergency access?

**Specific Issue: Broadway Hollywood Ingress/Egress:**

**The N-2 LADOT Correspondence dated April 10, 2020, from the City Approving the Traffic study in the EIR, rates the intersection of Hollywood and Vine as an “F” during am/pm for 2027 projections. There is no Neighborhood Traffic Management Program analysis, nor project features,**

traffic signal analysis, or mitigation specifically address the significant impacts to unique to the Broadway Hollywood Building. The anticipated added traffic (vehicle and pedestrian) will create undue congestion and during operations and once the project is complete will significantly limit or restrict ingress and egress to the only vehicular entrance servicing the 96 live/work units. An updated impact analysis must be conducted to determine if the impacts of this project would pose life, safety, or a government taking of access (ingress/egress) to a private property of all individual (96) unit owners.

The only vehicle entrance for all building parking is located on vine through an alley between the building and the Hollywood Plaza building. Increased pedestrian or added traffic will block the only entrance to building parking. Taking access and/or increasing the burden of access to this building is a significant impact. There is no left turn into this alley, thus there is only one way access from Vine traveling south. Pedestrian flow impacts the ability for vehicles to enter or exit the alley onto the street.

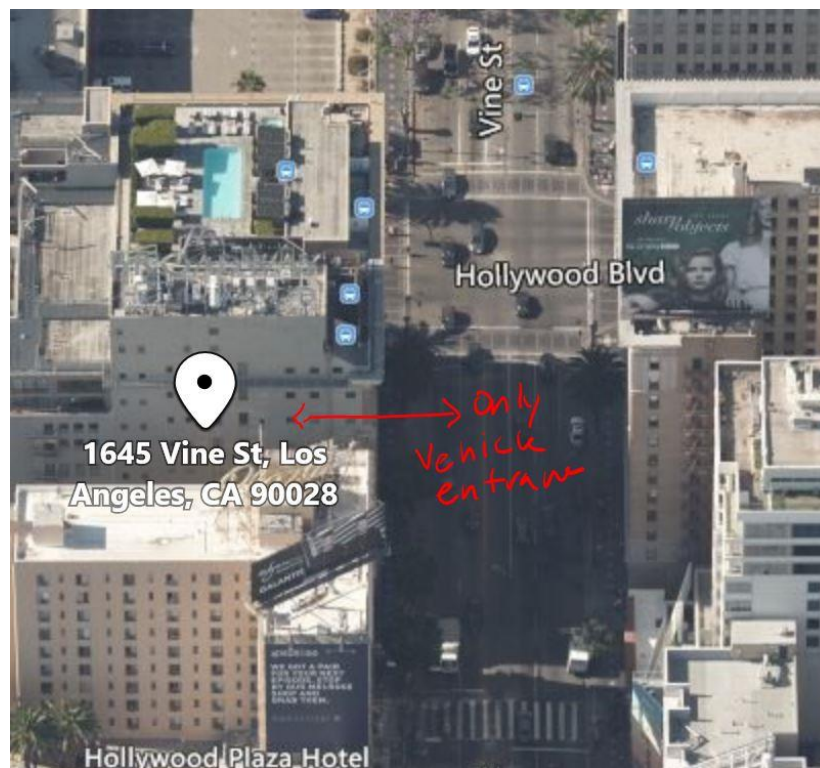


Figure 1: Bird's Eye view of only vehicle access point





*Figure 2 Street view of only vehicle access point*

For reference, a copy of the Draft Environmental Impact Report (DEIR) transportation and traffic analysis submitted by experienced traffic engineering professional, Tom Brohard, PE is attached. We agree with his DEIR project traffic analysis and summary that additional study, evaluation, and findings disclosure to the public is required. This analysis must be completed in advance of project approval for the Lead Agency to comply with CEQA's intent to evaluate the project's environmental operational, project, and cumulative impacts.

In addition, his analysis supports our general comment that the Hollywood Center Project as proposed would result in significant irreversible direct and indirect transportation and traffic impacts for the Broadway Hollywood Building and its owners/occupants located at the corner of Hollywood and Vine. After reviewing a copy of the attached May 27, 2020 Project DEIR public comment letter and analysis completed by a career California City engineer with 50 years of planning experience, below are the key impact issues that we as one of the unit owners at the Broadway Hollywood Building asks the City as the Lead Agency to specifically address the following under the traffic and transportation section of the EIR:

- 1) Hollywood/Vine traffic impacts that have not been properly studied and include specific existing conditions that will potentially significantly impact or block cross streets, alleys, and ingress/egress to the Broadway Hollywood Building's primary and only vehicle entrance. Increased vehicle and pedestrian activity needs to be studied, measured, and monitored for impacts and cumulative impacts that will put an undue burden (with potential safety issues) on the 96 unit owners, including a commercial restaurant located at the

street level. Should findings after study show that there is a significant impact in blockage, it could be a type of city “taking” of access to our building.

- 2) The Transportation Demand Management plan should be required and reviewed PRIOR to the issuance of ANY permits in order to take credits for a program. This is a key issue for our specific concerns. There may not be a TDM that will remedy the blockage of the only vehicle entrance to our building. This may result in a “no project” alternative if significant enough. This analysis should include cumulative impacts that include the recent 2020 “Hollywood Walk of Fame Concept Plan” and the newly installed “scramble” crosswalks at both Hollywood and Vine and Hollywood and Highland. All planning conflicts and contradictions including but not limited to the items outlined in the May 27, 2020 Tom Brohard and Associates letter for vehicle and pedestrian traffic should be resolved prior to any credits are taken and project permits approved by the City.
- 3) We, as unit owners at The Broadway Hollywood Building, will be significantly impacted without TDM plans that are drafted and include quantified and validated neighborhood traffic management measures that are identified, mitigated and agreed upon with the unit owners/building’s HOA input BEFORE the project is approved and any project permits are issued.

II. The Broadway Hollywood building is clad with original character defining masonry work as described in the EIR and above that is directly and indirectly impacted or potentially by project operational vibration/noise and the Broadway Hollywood building, located within one city block of the project site(s) and **it seems suspect that The Broadway Hollywood Building HOA and its 96 individual owners are missing from the list of identified as impacted or potentially impacted** as part of the cultural resources analysis, or mitigation monitoring; including damage repairs contained in Chapter IV, Environmental Impact Analysis, where the Project would result in significant and unavoidable impacts with regard to: 1) Cultural Resources: Project-level and cumulative structural vibration impacts during construction to off-site historic architectural resources. 2) Noise and Vibration: i) Construction Noise – Project-level and cumulative noise impacts to offsite noise sensitive receptors from on-site construction activities and offsite vehicle and truck travel. ii) Construction Vibration – Project-level and cumulative structural vibration impacts to adjacent off-site buildings, and human annoyance vibration impacts to adjacent sensitive receptors. Please add our HOA and individual owners to the list of identified potentially impacted historic resources, such that we can participate in planning, monitoring, mitigation, and report damage repair requests that may result as part of this project.



- III. There are project alternatives identified in the DEIR and listed below that with additional consideration to the specific issues noted above, we could be in support of with additional mitigation measures and/or no additional height/density variances to the alternatives as outlined below:

**Alternative 1: No Project/No Build Alternative** In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. CEQA Guidelines Section 15126.6(e)(3)(B) states that, “in certain instances, the No Project/No Build Alternative means ‘no build’ wherein the existing environmental setting is maintained.” Accordingly, for purposes of this analysis, the No Project/No Build Alternative (Alternative 1) assumes that no new development would occur within the Project Site. The portion of the Project Site that would have been occupied by the Project would continue to operate as paved surface parking lots and a small storage building (West Site) and the Capitol Records Complex (East Site).

**Alternative 2: Development under Existing Zoning Alternative** The Development Under Existing Zoning Alternative (Alternative 2) would conform to the Project Site’s existing zoning designation. The development of Alternative 2 with a mix of residential, retail, and restaurant uses would be similar to the Project, although residential uses would be proportionally reduced to reflect the reduction in floor area ratio (FAR) from 6.973:1 over the Project Site under the Project to 3:1, except for a small section in the northwest corner of the West Site, which would be developed to an FAR of 2:1. Alternative 2 would be developed with a total of 30,176 square feet of retail and restaurant uses, which is the same as the floor area of retail and restaurant uses provided by the Project. Alternative 2 would include approximately 36,141 square feet of publicly accessible open space at the ground level, which would form a paseo through the Project Site. No performance stage would be located within the paseo off of Vine Street on the East Site.

Alternative 2 would provide a total of 384 market-rate residential units and no senior affordable units. Alternative 2’s residential component would be provided within two high-rise buildings, one each on the East Site and West Site, respectively. Each building would provide 192 market-rate residential units. **The East Building would be 18 stories and reach a height of 243 feet at the top of the 18th story and 293 feet at the top of the bulkhead. The West Building would be 14 stories and reach a height of 195 feet at the top of the 14th story and 235 feet at the top of the bulkhead.** The senior affordable buildings would not be constructed under Alternative 2 as this is zoning compliant alternative does not trigger Measure JJJ [Los Angeles Municipal Code (LAMC) Section 11.5.11)]. A three-level subterranean parking structure containing 300 spaces would be provided on the East Site, and a two-level subterranean parking structure containing 193 parking spaces would be

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provided on the West Site, for a total of 493 parking spaces. Vehicle and bicycle parking would be provided in accordance with LAMC requirements. The total floor area for Alternative 2 would be approximately 480,516 square feet, which would result in an FAR of 2.96:1, and represent an approximately 62.7-percent reduction in the Project's total floor area and a 62.3-percent reduction compared to the Project with the East Site Hotel Option.

Sincerely,

Lannette and Ross Schwartz  
Majestic Heights, LLC  
1645 Vine Street, Unit 411  
Hollywood, CA 90028

May 27, 2020

Ms. Mindy Nguyen (via Email [mindy.nguyen@lacity.org](mailto:mindy.nguyen@lacity.org))  
City of Los Angeles, Department of City Planning  
221 N. Figueroa Street, Suite 1350  
Los Angeles, CA 90012

**SUBJECT: Hollywood Center Project - Draft Environmental Impact Report –  
Transportation and Traffic Issues**

Dear Ms. Nguyen:

Tom Brohard, P.E., has reviewed the April 2020 Draft Environmental Impact Report (Draft EIR) and the April 2020 Transportation Assessment for the Proposed Hollywood Center Project bisected by Vine Street just north of Hollywood Boulevard in the Hollywood Community Plan area of the City of Los Angeles. Overall, the Project would contain nearly 1.3 million square feet of developed floor area including 1,005 residential housing units, retail and restaurant uses totaling 30,176 square feet, open space of 166,582 square feet, up to 1,521 vehicle parking spaces, and up to 551 bicycle parking spaces. Four new buildings are proposed including a 35-story building on the West Site, a 46-story building on the East Site, and two 11-story buildings (one on each site) set aside for housing for seniors. The Project also contains a Hotel Option within the East Site, with 220 hotel rooms on Levels 3-12 replacing 104 residential units.

My review disclosed that the Draft EIR and the Transportation Assessment for the Hollywood Center Project are fatally flawed. Several transportation and traffic issues have not been thoroughly or properly studied. This letter points out those deficiencies that must be addressed before considering the Project further.

**Education and Experience**

Since receiving a Bachelor of Science in Engineering from Duke University in Durham, North Carolina in 1969, I have gained over 50 years of professional traffic engineering and transportation planning experience. I am licensed as a Professional Civil Engineer both in California and Hawaii and as a Professional Traffic Engineer in California. I formed Tom Brohard and Associates in 2000 and have served many diverse communities as the City Traffic Engineer and/or the Transportation Planner. During my career in both the public and private sectors, I have reviewed numerous environmental documents and traffic studies for various projects as shown in a short summary of my experience in the enclosed resume.

**Transportation and Traffic Issues**

Based on the information in the Draft EIR and the Transportation Assessment, each of the following traffic issues must be fully addressed and evaluated:

Hollywood Center Project - Traffic Analysis.doc

**Ms. Mindy Nguyen**  
**Hollywood Center Project - Draft EIR – Transportation and Traffic Issues**  
**May 27, 2020**

- 1) Hollywood/Vine Traffic Impacts Have Not Been Properly Studied – Traffic counts at Hollywood Boulevard and Vine Street of vehicles, bicyclists, and pedestrians were made for the Transportation Assessment on May 23, 2018. Google Earth photographs made on June 8, 2018 as well as the traffic counts made for the Transportation Assessment do not show or consider the diagonal “scramble” crosswalk markings or the “No Right Turn on Red” signing at the intersection installed and then celebrated on August 2, 2018 (see <https://www.youtube.com/watch?v=COlpuxNy9c4>).

The Notice of Preparation of the Environmental Impact Report was issued on September 4, 2018. The Transportation Assessment fails to properly study and evaluate the Project traffic impacts at Hollywood/Vine with the “scramble” crosswalks and “No Right Turn on Red” signing that was installed a month earlier. This significant change in the operation of the intersection causes additional congestion, queuing, and delay for vehicles beyond what previously existed without these devices.

Page 34 of the July 2019 LADOT Transportation Assessment Guidelines requires a quantitative evaluation of the project’s expected access and circulation operations. “Project access is considered constrained if the project’s traffic would contribute to unacceptable queuing on an Avenue or Boulevard at project driveways or would cause or substantially extend queuing at nearby signalized intersections. Unacceptable or extended queuing may be defined as follows:

- Spill over from turn pockets into through lanes.
- Block cross streets or alleys.
- Contribute to “gridlock” congestion. For the purposes of this section, “gridlock” is defined as the condition where traffic queues between closely spaced intersections and impedes the flow of traffic through upstream intersections.”

Page 12 of the Transportation Assessment identifies Hollywood Boulevard as an Avenue I and Page 13 identifies Vine Street as an Avenue II in the City’s Mobility Plan 2035. Queuing has not been evaluated in the Transportation Assessment for Hollywood/Vine before the “scramble” and the “No Right Turn on Red” restrictions were installed or under future scenarios. According to residents living at Hollywood/Vine, queuing has increased substantially since these changes were made. The 96 residential units at 1645 Vine Street have only a single alley/driveway that accesses their parking lot from the west side of Vine Street only 160 feet south of Hollywood Boulevard. Traffic on Vine Street has deteriorated with the “scramble” and “No Right Turn on Red” as it is now frequently queued beyond their alley/driveway, blocking turns into and out of Vine Street.

**Ms. Mindy Nguyen**  
**Hollywood Center Project - Draft EIR – Transportation and Traffic Issues**  
**May 27, 2020**

Page 48 of the Transportation Assessment states “There are conditions at specific locations, such as congestion, queuing, and pedestrian activity, where the CMA methodology can be adjusted to more accurately reflect intersection operating conditions at specific intersections. Additionally, the analysis includes several intersections along major thoroughfares that experience heavy congestion during morning and evening peak traffic periods. The congestion along these streets can result in a reduction in the vehicles counted in the peak direction of travel and reduced capacity during peak travel times. Based on field observations, this reduction in vehicle throughput was determined to inaccurately reflect the existing LOS experienced by motorists at four of the study intersections. At these intersections, the LOS that is presented in the analysis was adjusted to reflect the observed conditions of a worse LOS than was initially calculated using the CMA methodology.”

Calculations in the Transportation Assessment for Hollywood Boulevard and Vine Street, one of the four intersections where LOS adjustments were made, indicate volume to capacity (V/C) ratios of 0.685 and 0.679 respectively in the AM and the PM peak hours for existing conditions in Year 2018. These calculations do not properly account for the “scramble” and “No Right Turn on Red” conditions. Without LOS adjustments, those V/C values equate to LOS B. In Table 6A of the Transportation Assessment, the LOS for both peak hours for Hollywood/Vine was adjusted from B to “F\*”, with the footnote indicating “\* LOS based on field observations since the CMA methodology does not account for vehicular queues along corridors, pedestrians, conflicts, etc. in every case. Thus, the calculated average operating conditions may appear better than what is observed in the field.”

Additional time is required for pedestrians to diagonally cross Hollywood Boulevard and Vine Street. Right turns on red are now prohibited in all directions at Hollywood Boulevard and Vine Street. Neither of these measures were properly reflected in any LOS calculations in the Transportation Assessment. None of the calculations properly reflect the impacts of the “scramble” and the “No Right Turn on Red”.

In their April 10, 2020 review of the Transportation Assessment, LADOT admits that “...the trips generated by the proposed development will likely result in adverse circulation conditions at several locations. DOT has reviewed this analysis and determined that it adequately discloses operational concerns.” Unfortunately, the significant transportation and traffic impacts have not been addressed or mitigated by the Project Requirements, Project Design Features, or other proposed measures.

Hollywood Center Project - Traffic Analysis.doc

**Ms. Mindy Nguyen**  
**Hollywood Center Project - Draft EIR – Transportation and Traffic Issues**  
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The Hollywood Center Project is proposed on both side of Vine Street less than 400 feet north of Hollywood Boulevard. With generous credits and unsupported reductions for a Transportation Demand Management (TDM) Program that has not yet been developed or adopted, the Hollywood Center Project is still forecast to generate at least 10,564 daily trips, including 792 trips in the AM peak hour and 1,201 trips in the PM peak hour (Tables 7 and 8 of the Transportation Assessment). At least 60 to 80 percent of the trips for the residential, commercial and hotel portions of the Project will travel through Hollywood Boulevard and Vine Street (Figures 7A, 7B, and 7C of the Transportation Assessment). The additional trips to and from the Hollywood Center Project will cause additional queuing and congestion at Hollywood/Vine above and beyond what already occurs without the Project, making resident vehicular access to and from 1645 Vine Street even more difficult.

In addition to adding many more daily and peak hour trips to the already overburdened conditions at Hollywood/Vine, the Hollywood Center Project will also add many more pedestrian and bicycle trips through that intersection. TDM items, while intended to reduced solo peak hour vehicle trips, will also add significant volumes of pedestrians and bicyclists to the congestion and queuing at Hollywood/Vine.

- 2) Trip Reductions with TDM Plan Are Overstated and Overemphasized – TDM (Transportation Demand Management) Plans are typically utilized to reduce single occupant vehicle trips during normal worker commute hours. These plans are most effective when most workers leave from or arrive at their residences at the same time. Page 4 of the April 10, 2020 LADOT letter identifies 29 possible TDM strategies, many of which have already been assumed as “given” in the LADOT VMT Calculator.

At this point, there is no TDM Program for the Hollywood Center Project. Instead, LADOT will require that a “...preliminary TDM Program shall be prepared and provided for DOT review prior to the issuance of the first building permit for this project and a final TDM program approved by DOT is required prior to the issuance of the first certificate of occupancy for the project.” The Transportation Assessment cannot rightfully take credits for a TDM Program that does not exist.

Furthermore, there is no program to periodically monitor the effectiveness of the yet to be developed TDM Program for the Hollywood Center Project. In addition, there are no enforcement provisions for the TDM Program if the trip reduction goals are not achieved. Regular monitoring and enforcement provisions must be added to the TDM Program to ensure that the assumed trip reduction goals are achieved or exceeded.



Hollywood Center Project - Traffic Analysis.doc

**Ms. Mindy Nguyen**  
**Hollywood Center Project - Draft EIR – Transportation and Traffic Issues**  
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- 3) TSM Improvements Have Not Been Quantified – Page 5 of the April 10, 2020 LADOT letter indicates that the Hollywood Center Project will be required to install new conduits and cables to increase capacity for additional CCTV cameras for real-time video monitoring of intersection, corridor, transit, and pedestrian operations in the Hollywood area along portions of Gower Street and Hollywood Boulevard. The letter concludes that these improvements will provide a system-wide benefit by reducing delays experienced by motorists at study intersections. The benefit of these improvements must be quantified.

The TSM Improvements along Hollywood Boulevard required by LADOT appear to directly conflict with the Hollywood Walk of Fame Concept Plan discussed below. These conflicts and contradictions must be resolved.

- 4) Benefits of Improvements Must Be Quantified and Validated – Page 3 of the April 10, 2020 LADOT letter indicates that the Project applicant has agreed to fund four measures in the area of the Project under a Development Agreement including:
- a) Implement the Mobility Hub.
  - b) Implement bicycle improvements.
  - c) TSM improvements.
  - d) Construct Neighborhood Traffic Management measures.

None of these measures are defined to allow reviewers of the Draft EIR to understand the expected benefits that implementation of these measures will provide. Without quantification and further explanation of what these improvements will entail, the value and potential benefit of these offers of financial participation cannot be determined.

- 5) “Hollywood Walk of Fame Concept Plan” Has Not Been Considered – The January 2020 Concept Plan for the Hollywood Walk of Fame envisions expanding the existing sidewalk on both sides of Hollywood Boulevard between La Brea Avenue and Argyle Avenue from 15’ to 25’. Implementation would require the elimination of on-street parking and one travel lane in each direction.

The Transportation Assessment indicates that conditions for pedestrians on the Walk of Fame along Vine Street will be improved by the closure of six driveways with the Hollywood Center Project, with vehicle access relocated to the side streets instead. However, the Transportation Assessment fails to address or consider impacts associated with the removal of the parking lane and one travel lane in each direction on Hollywood Boulevard.

**Ms. Mindy Nguyen**  
**Hollywood Center Project - Draft EIR – Transportation and Traffic Issues**  
**May 27, 2020**

In summary, the Proposed Project must fully evaluate and disclose the potential traffic impacts and conflicts pointed out in this letter. Further study must be undertaken and more detailed information must be provided in order to properly identify and address the traffic impacts and the scope of the traffic improvements that will be created by the Proposed Hollywood Center Project. If you have questions regarding these comments, please contact me at your convenience.

Respectfully submitted,

**Tom Brohard and Associates**

Tom Brohard, PE  
Principal

Enclosure