

From: Alexa Iles <alex@mediaart.com>
Sent time: 06/01/2020 02:30:13 PM
To: Mindy Nguyen <mindy.nguyen@lacity.org>
Cc: David Ryu <david.ryu@lacity.org>; mayor.garcetti@lacity.org; councilmember.ofarrell@lacity.org; vince.bertoni@lacity.org; kevin.keller@lacity.org
Subject: HDCA Comments on ENV-2018-2116-EIR Hollywood Center Project
Attachments: HDCA Comments ENV-2018-2116-EIR May 30 2020.pdf

Hello Mindy,

Please note the attached public comments on the Draft EIR for the proposed Hollywood Center Project, submitted by the Hollywood Dell Civic Association on behalf of our neighborhood.

All the best,

Alexa Iles Skarpelos

President
Hollywood Dell Civic Association
(310) 497-3982



May 30, 2020

Mindy Nguyen
 City of Los Angeles, Department of City Planning
 221 North Figueroa Street, Suite 1350
 Los Angeles, CA 90012

Re: Public Comments
 Environmental Case Number: ENV-2018-2116-EIR
 State Clearinghouse Number: 2018051002
 Project Name: Hollywood Center Project

Dear Ms. Nguyen:

The Hollywood Dell Civic Association (HDCA) submits the attached comments on behalf of the Hollywood Dell Neighborhood. The Hollywood Dell Neighborhood is situated in the hills just north of the Project site. The Hollywood Dell is bordered by Cahuenga Blvd. to the west, Argyle Avenue to the east, Franklin Avenue to the south and extends north to the Hollywood Reservoir. The HDCA represents the 1,100+ households within these borders.

The Hollywood Dell community is active and civic-minded. Many of our residents have lived in this area for decades. We (pre COVID-19) have regular neighborhood meetings and take a great interest in the proposed development projects in Hollywood because they have a direct and long-term impact on our quality of life.

Given that the report is thousands of pages, and that our reasonable request for an extension of the comment period due to the very unusual circumstances of the global COVID-19 pandemic was denied, it has been quite difficult to work with our community to provide our feedback and questions on this project. The process has unfairly disadvantaged the public and we want that on the record. With the limited time allotted and the quarantine still in place, the following represents a first quick pass on some of the areas this massive DEIR covers.

It is absolutely shameful that the Planning Department has continued with this limited public comment period (45 days) during a global pandemic, despite the pleas of numerous community-members, despite the quarantine orders, which can only be described as "unusual circumstances," and despite the massive size & complexity of the EIR.

Sincerely,

Alexa Iles Skarpelos
 President
 Hollywood Dell Civic Association

David Brewer
 HDCA Vice President

Kelly Ziegler
 HDCA Treasurer

Jan Hohenstein
 HDCA Secretary

I. Because we are a hillside community, we are included in the area designated as a “Very High Fire Hazard Severity Zone” (VHFHSZ) by the Los Angeles Fire Department.

<http://geohub.lacity.org/datasets/lacounty::fire-hazard-severity-zones?geometry=-118.672%2C34.073%2C-118.084%2C34.172>

The VHFHSZ comprises most of the hilly and mountainous regions of the City of Los Angeles. This determination was made based on the following criteria:

- Presence of highly flammable vegetation that creates hazardous fuel supply for brush fires
- Steep hillsides mean difficult terrain for fighting fires once they start
- Intersections that create choke points for vehicle access, narrow /substandard street widths with hairpin turns that impede emergency vehicle access, and delay citizen evacuations during an emergency event.
- We have several streets in the Hollywood Dell that have “Red Flag Alert” parking restrictions

In light of the devastating brushfires in recent years, Hollywood Dell residents are very concerned with how quickly emergency teams will be able to respond to fires. How will the project impact response times to fire and associated public safety events in the area of the Project and adjacent areas?

There are few key entry points into the Hollywood Dell (see attached neighborhood map). Two of the main LAFD Fire Stations that service the Hollywood Dell are 27 & 82, both of which would have to travel through the area of the Project site to respond to emergency calls in our neighborhood.

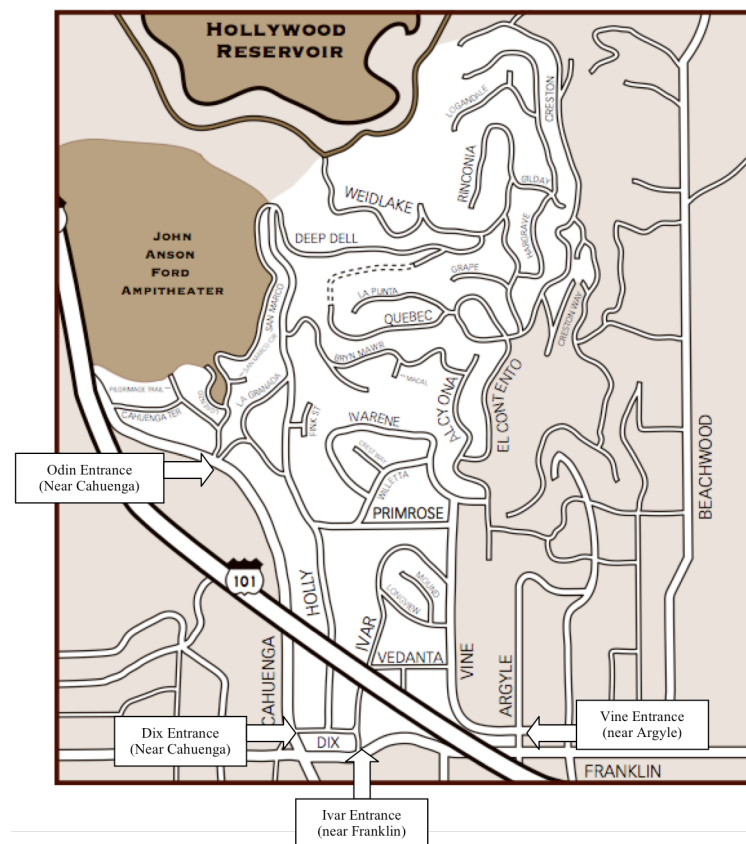
In addition, the response times listed in the report do not effectively take into account the disruption of traffic that a project of this nature will have. The area is often seized by gridlock making sirens and alternative routes ineffective. With the advent of this enormous project, this gridlock will be exacerbated many times over. Public streets are frequently closed for construction activity, which increases the delays for emergency vehicles. We need a future forecast on response times that take into account the disruption of mobility in the area.

The project area is filled with low-rise structures rarely higher than 12 stories and often only 5 to 6 stories tall. Most of the Fire Stations in Project area are not prepared to deal with anything more than assessment Light Force. Only 2 have an engine. These stations may not be equipped or trained to deal with a fire in a high-rise proposed at the project.

What are the plans to add additional capacity and measures necessary for LAFD to respond to fire and public safety emergencies in very tall high-rise buildings? According to the report, as of March 2, 2020 the LAPD had 10,004 sworn officers for a City population of 4,029,741. That comes out to roughly 1 officer for every 400 residents.



HOLLYWOOD DELL CIVIC ASSOCIATION NEIGHBORHOOD MAP



2. In Hollywood, there are 352 sworn officers serving a population of approximately 300,000. Hollywood has approximately half of the coverage compared with the overall City figure, with 1 officer for every 852 residents. Alarming, because Hollywood is a world-class attraction for visitors and tourists are often the victims of crime in Hollywood. The significant population of visitors, including tourists, was not included in the calculations in the EIR.

Why wasn't the unique aspect of Hollywood tourism and the impact on police services addressed as part of the public safety analysis?

If it's determined that additional resources are in fact required, and given that this Project construction phase could be 7 years, by when would additional resources be expected?

According to the "Projected Increases in Police Service Population" estimates of non-residents are calculated as just 3 people per 1,000 square feet. Presumably, the 30,000 square feet of commercial space will generate a significantly higher number of people interacting with the businesses and venues of the Project site. Restaurants, hotel, retail shops and other commercial operations rely on lots of people (workers, guests, customers, visitors etc.) to be profitable.

Why weren't the non-resident estimates more reflective of the volume of people who will be on the Project Site once completed and operational? Won't non-residents also potentially generate calls for service from LAPD?

The response times for calls for service for LAPD are discussed and specifically, the Project is described as having the "potential to increase emergency vehicle response times due to travel time delays cause by the additional traffic." That is quite an understatement. In fact, the construction and operation of the completed Project will absolutely affect response times. Police and Fire vehicles must go past this Project site to access our neighborhood during an emergency.

We question the reality of those numbers for our community. First of all, the emergency response numbers quoted are from several years ago. Where are the more current (2019) figures?

Secondly, because we have few access points into the Hollywood Dell, emergency response times for our neighborhood are likely much longer than typical. Many people in our neighborhood, and other hillside residential neighborhoods, report waiting HOURS for a non-emergency call response. More alarmingly, even a crime-in-progress can result in a wait time many times more than the 3.2 minute figure from 2017 quoted in the report. Because of the topography of our neighborhood, the narrow and winding streets and the proximity to the Hollywood Entertainment District, AND this proposed Project, Hollywood Dell residents are very concerned about response times to calls for service in our neighborhood.

Where is the data showing response times for the residential neighborhoods just north of the project site? These should be segmented out and available for public review.

How will the response times of police and fire departments to our Hollywood Dell area be affected by this massive development in view of (1) the additional traffic generated by resident, businesses, and Uber / Lyft rideshares surrounding the Project and (2) the displacement of existing traffic and parking from surrounding the Project to that congesting the streets of our adjacent Hollywood Dell neighborhood?

Under "Security Features During Operation" the report mentions training, lighting, security cameras, 24/7 security personnel and controlled access to specific private areas of the Project. It does not adequately address the publically accessible areas. Where is the public safety plan for those publically accessible spaces?

The 2019 Homeless Count identified 2,953 people un-housed in Council District 13. At least 30% of those have serious mental illness. Encampments in Hollywood in recent years have been an ongoing and overwhelming problem for residents and authorities. Many of these encampments have formed in and around the areas near the 101 Freeway, just a few blocks from the project site.

Recently (May 15, 2020) U.S. District Court Judge David O. Carter issued an injunction that required the City, County and homelessness officials to provide space in shelters or alternative housing for those who were currently encamped near freeway overpasses, underpasses, and ramps. Essentially, the City has been directed to move the homeless away from these Freeway areas for their own safety. LAPD has repeatedly told the community that they cannot compel someone to go to a shelter. How would the public spaces of this Project be affected by the shifting of the un-housed population away from nearby freeway underpasses?

Un-housed Residents (aka homeless) use up a lot of LAPD resources. According the Commanding Officer of the Hollywood Division, dealing with issues related to the homeless and the encampments in the area is a regular, and often all-consuming part of each day for Hollywood LAPD. How can nearby residential communities be assured that the private security for this Project once completed, aren't going to just push the problem into their neighborhoods?

There is no mention in the report of the massive homelessness problem in Los Angeles, and specifically in Hollywood. Yet, the homeless are undeniably part of the "environment." How would the design, construction and operation of this Project impact efforts to get the homeless off the streets? How would the Project design provide attractive and usable public green space, while discouraging encampments?

Under "Security Features During Operation" the report only mentions LAPD in the context of making security footage available as needed for investigations. The inference is that the 24/7 private security planned for the Project once completed and in operation would be the primary security and enforcement on site. While private security is fine, there are some things that are more appropriately handled by LAPD. What is the plan for how LAPD will work with the Project site security personnel?

What if there are conflicts of interest that might influence enforcement by private security personnel? For instance, a resident or commercial tenant or event creating a condition that causes complaints from the surrounding community? Will private security bite the hand that feeds it? What is the plan to ensure public safety and quality of life for ALL?

3. Noise Sensitive Receptor Locations: *"Noise-sensitive receptors are locations where people reside or where the presence of unwanted sound could adversely affect or disrupt the types of activities associated with the land use..."*

Despite its proximity to the Project site, why was the Hollywood Dell neighborhood omitted in the noise-sensitive receptor locations? What was the rationale for excluding the hillside neighborhoods north of the Project site from consideration with regards to noise?

Generally, noise is most audible when traveling by direct line-of-sight. Line-of-sight is the straight line along which an observer has unobstructed vision. Barriers such as walls, berms, trees or buildings that break the line-of-sight between the sound source and the receiver greatly reduce noise levels by filtering or interrupting the projection.

In recent years Hollywood Dell residents have become impacted by an increase in noise levels from concerts emanating from the Hollywood Bowl. The volume had become an issue as the Hollywood Bowl sound system became more powerful. Neighbors a ½ a mile away from the Bowl were unable to ignore the din from inside their homes. In response to feedback from the community, the Hollywood Bowl management took steps to address the issue. They conducted sound tests and made significant efforts to monitor sound levels and adjust their operations to minimize the negative impacts on adjacent neighborhoods.

Over the past 10 years, south of our neighborhood, there has been a proliferation of rooftop venues at trendy boutique hotels in the Hollywood Entertainment District. The amplified music and noise from these popular hotspots has become intrusive and annoying to many hillside residents, as it flows without a break in the line-of-sight across great distance (see figure attached)

In January of 2010 the W Hotel Hollywood (12 stories) opened its popular rooftop pool deck at Hollywood and Argyle. In June of 2016, Mama Shelter, at Selma & Wilcox is a boutique hotel (6 stories) with a rooftop venue that projects sound into the surrounding neighborhoods. The Dream Hotel, (10 stories) which opened in July of 2017,

also at the intersection of Selma & Wilcox, features an 11,000 square foot rooftop venue called the Highlight Room.

All three of these examples are south of the Project site, but within blocks. They are also significantly lower in overall height than the 46-story proposed towers of the Project, and equivalent in height to the two 11-story structures. The sound carries, unimpeded from these rooftops to our hillside and can be heard as far as 3/4 a mile away.

There are numerous outdoor spaces planned for the Project, including several “Amenity Decks/Terraces” and “Rooftop Terraces.” What is the plan for making sure similar noise resulting from the operation of the completed Project doesn’t have a significant negative impact on the adjacent neighborhoods? How can this be enforced? How can the sound emanating from these massive high-rises be stopped from flowing, especially from the upper floors and outdoor spaces that face the hills to the north?

Recommendations were created by the Hollywood Community-Police Advisory Board to ensure public safety and maintain a quality of life for the visitors and stakeholders within the Hollywood community. They were in response to the proliferation of rooftop venues and the increase in noise complaints. The recommendations address hours of use, low / ambient sound and amplified sound.

Why wasn’t there any reference to the Community-Police Advisory Board (CPAB) “Recommended Conditions for Unenclosed / Open Rooftop / Elevated Patio operations?”

4. The report identifies locations near the Project that house sensitive populations (children, elderly, ill persons) and lists 9 such land uses, generally apartment buildings, schools, and hotels. But the report also identified 5 Related Projects, which are to be built in the surrounding area, all of which would or could house sensitive populations. Collectively these 5 Related Projects include 307 additional dwelling units, 601 hotel rooms, 233,000 square feet of office/workspace and 7,000 square feet of retail.

Why does the evaluation of air quality impacts of the Project ignore the addition of the thousands of sensitive populations that would dwell or work or shop in the 5 Related Projects since you must assume these 5 Related Projects will also be built in the area?



The report identifies haul routes for the removal of over 500,000 cubic yards of dirt as well as for the transportation of cement. This route specifies the southbound U.S. 101 on-ramp, which is within 380 feet of the Project. The DEIR assumes 192 maximum in and out bound haul trucks trips per day (24/hour), 188 maximum in and out bound cement trucks per day (23.5/hour) and 640 maximum in and out bound daily worker trips per day. Yet the traffic report for the DEIR does not provide traffic information for current or increased daily traffic on Argyle north or southbound. As local residents, we are well aware that the NB on-ramp to US 101 at Franklin and Argyle is stagnant at rush hours and take many lights in order to pass through from any side. The addition of these hundreds of additional haul/cement/worker trips per day is going to vastly increase the number of cars and trucks on NB Argyle as well as the amount of time those cars and trucks are idling trying to get up to Franklin to take the on-ramp. The planned work hours – 7 a.m. to 3 pm, Monday through Saturday, for a period of as long as 7 years of construction – poses a serious threat to the air quality of the neighborhood, especially the sensitive populations mentioned above.

What is the effect on air quality caused by the increased congestion to existing traffic and lengthier idling of cars caused by the addition of the haul/cement/worker trips of the Project?

The report was written prior to the COVID-19 pandemic. As a result of the pandemic it is currently known that public confidence and use of public transit is significantly reduced. People do not want to be in enclosed environments where they may be exposed to the virus.

What is the expected impact of the COVID-19 pandemic on air quality surrounding the Project in view of the fact that individuals who live/work/eat there will be less likely to take public transportation and more likely to own a vehicle or take an Uber or Lyft?

In calculating the vehicle miles anticipated to be traveled by residents/workers at the Project, have the use of Uber and Lyft type of services been figured into the VMT?

Further, how can it be concluded in a real world that on average 1500 individuals living at these apartments would travel under 5 miles a day, given that the distances to work downtown, in Santa Monica, or the valley are well over 5 miles? Assuming that such individuals are going to be using public transportation, how is that conclusion affected by the COVID-19 pandemic, and people's changed views of public transportation? And ultimately, isn't the estimate of the effect of the Project on air quality going to be negatively increased as a result?

The report focuses on diesel exhaust as the only significant cause of Toxic Air Contaminants (TACs) and then only during construction. It is such a concern that mitigation surrounding the use of diesel equipment during construction is required. However, why doesn't the report evaluate the source of other TACs caused by the significantly increased traffic on Argyle – and other surrounding streets – caused by the hundreds of haul/cement/worker trips anticipated by the Project and their interference with the already-crowded traffic on such surrounding street? What is the effect on air quality in terms of TACs due to the excessive haul/cement/worker trips?

5. The report indicates the Land Use Element of the City's General Plan is comprised of 35 Community Plans and states the "City's Community Plans are intended to provide an official guide for future development and propose approximate locations and dimensions of land use at the community level." Furthermore, the report acknowledges the Project is located within the Hollywood Community Plan area and the 1988 Hollywood Community Plan is still in effect. However, the report professes that:

"The Project or the Project with the East Side Hotel Option would not induce substantial unplanned population growth in an area, either directly (for example by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). Therefore, the Project would result in less than significant impacts related to induced (sic) substantial unplanned population growth."

without including analysis of the impact from the Project or the Project with the East Side Hotel Option on population and housing growth within in the Hollywood Community Plan area. Rather, in an effort to support the opinion quoted above, the report relies on analyses based on population, housing, and employment growth

estimates for the entire City of Los Angeles, not population, housing, and employment growth estimates for the Hollywood Community Plan area.

Why does the evaluation of population growth rely on growth estimates for the entire City of Los Angeles and what analyses have been done to support the opinion quoted above based on growth estimates for the Hollywood Community Plan area?

The report includes discussion of the cumulative impacts of the Project or the Project with the East Side Hotel Option and Appendix L of the report includes a “calculation of the cumulative number of housing units, population, and employees attributable to” the 123 projects located in the City of Los Angeles and the 27 projects located in the City of West Hollywood listed in Table III-I of Chapter III of the report. As noted by the report, the Project is located within the Hollywood Community Plan area and the 1988 Hollywood Community Plan is still in effect. However, the report professes that:

“...the Project’s or the Project with the East Side Hotel Option’s contribution to cumulative impacts would not be cumulatively considerable. As such, cumulative impacts on population and housing would be less than significant.”

without including analysis of the cumulative impact from the Project or the Project with the East Side Hotel Option and other projects listed in Table III-I of Chapter III of the report located in the Hollywood Community Plan area on population and housing within in the Hollywood Community Plan area. Rather, in an effort to support the opinion quoted above, the report relies on analyses based on population, housing, and employment growth estimates for the entire City of Los Angeles, not population, housing, and employment growth estimates for the Hollywood Community Plan area.

Why does the evaluation of the cumulative impacts on population and housing rely on growth estimates for the entire City of Los Angeles and what analyses have been done to support the opinion quoted above based on growth estimates for the Hollywood Community Plan area?

The report acknowledges the Project is located within the Hollywood Community Plan area and the 1988 Hollywood Community Plan is still in effect. Furthermore, the report states that key provisions relating to population and housing of the Hollywood Community Plan regarding preferred development in the Project vicinity include:

Objective 3: To make provision[s] for the housing required to satisfy the varying needs and desires of all economic segments of the Community, maximizing the opportunity for individual choice.

Objective 4a: To promote economic well being and public convenience through allocating and distributing commercial lands for retail, service, and office facilities in quantities and patterns based on accepted planning principles and standards.

The report, however, does not identify Objective 7 of the Hollywood Community Plan as a key provision relating to population and housing. Objective 7 states:

Objective 7: To encourage the preservation of open space consistent with property rights when privately owned and to promote the preservation of views, natural character and topography of mountainous parts of the Community for the enjoyment of both local residents and persons throughout the Los Angeles region.

The section on Population and Housing of the report also does not include the proposed residential density categories and their capacities pursuant to the Hollywood Community Plan. Under the Hollywood Community Plan the proposed dwelling units per gross acre for high-density residential areas is 60+ - 80.

What is the proposed number of dwelling units per gross acre (as defined in the Hollywood Community Plan) of the Project or the Project with the East Side Hotel Option? It appears the Project proposes approximately 200 dwelling units per gross acre (as defined in the Hollywood Community Plan). How is this proposal consistent with the 60+ - 80 range identified for high-density residential areas in the Hollywood Community Plan? What is the impact on population growth within the Hollywood Community Plan area of substantially increasing the density for

high-density residential areas in the Hollywood Community Plan area? The Project increases the number of dwelling units per gross acre by proposing two towers with heights substantially higher than existing developments. What is the impact of the Projects proposed increase in density on Objective 7 of the Hollywood Community Plan, i.e., “to promote the preservation of views...for the enjoyment of both local residents and persons throughout the Los Angeles region” pursuant to the Objective of the Hollywood Community Plan?

The report states “[w]hile HQTAs account for only three percent of the total land area in SCAG’s region, HQTAs are expected to accommodate 46 percent and 55 percent of future household and employment growth, respectively, between 2012 and 2040.” The report frequently refers to the expectation that HQTAs will accommodate a significant portion of population and employment growth in the Population and Housing section of the report. However, these expectations were developed prior to the COVID-19 pandemic. As a result of the pandemic it is currently known that public confidence and use of public transit is significantly reduced. People do not want to be in enclosed environments where they may be exposed to the virus. Furthermore, people may become less willing to reside in high-density developments.

What is the expected impact of the COVID-19 pandemic on population and employment growth in HQTAs?

The report professes that:

“...the Project’s or Project with the East Side Hotel Option’s contribution to cumulative impacts would not be cumulatively considerable. As such, cumulative impacts on population and housing would be less than significant.”

However, the report also acknowledges that the “West and East Buildings would have a substantially greater height and intensity than existing development in the area” and the Project would “boost residential densities, significantly increasing housing opportunities in the Hollywood Community Plan area.” However, the analysis in the Population and Housing section of the report does not appear to include discussion or analysis of the expected cumulative impact on population and housing in the Hollywood Community Plan area of boosting residential densities consistent with densities proposed by the Project.

What is the expected cumulative impact on population and housing for the Hollywood Community Plan area resulting from the boost in residential densities proposed by the Project?

In Table LU-2, the report opines the Project presents “No Conflict” with Objective 7 of the Hollywood Community Plan. Objective 7 states:

Objective 7: To encourage the preservation of open space consistent with property rights when privately owned and to promote the preservation of views, natural character and topography of mountainous parts of the Community for the enjoyment of both local residents and persons throughout the Los Angeles region.

However, in supporting this opinion, the report does not address the impact of the West and East Buildings, which the report acknowledges “would have a substantially greater height and intensity than existing development in the area,” on view of local residents or persons throughout the Los Angeles region. Towers which are of substantially great height and intensity than any existing or other currently proposed development in the Hollywood Community Plan area will certainly have an impact of the views of local residents or persons throughout the Los Angeles region.

What is the impact on views of the Hollywood Hills from existing developments south of the Project and views of the area south of the Hollywood Hills from existing residential areas located in the Hollywood Hills? Would the impact on views of the Hollywood Hills from existing developments south of the Project and of views of the area south of the Hollywood Hills from existing from existing residential areas located in the Hollywood Hills be mitigated by reducing the height and intensity of the West and East Buildings to levels consistent with existing development in the area and proposed densities described in the Hollywood Community Plan?

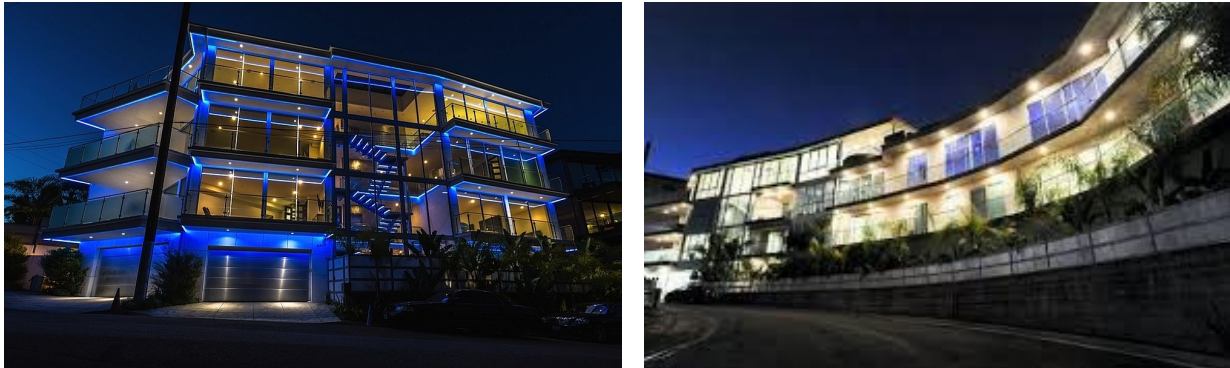
Would the impact on views of the Hollywood Hills from existing Developments south of the Project and of views of the area south of the Hollywood Hills from existing residential areas located in the Hollywood Hills be mitigated by reducing the height and intensity of the West and East Buildings to levels consistent with existing development in the area and proposed densities described in the Hollywood Community Plan?

6. According to the report:

“Artificial light is associated with the evening and nighttime hours, and sources may include streetlights, illuminated signage, vehicle headlights, and other point sources. Uses, such as residences and hotels, are considered light-sensitive since they are typically occupied by persons who have an expectation of darkness and privacy during evening hours and who can be disturbed by bright light sources.”



Recent developments in lighting technology have resulted in a new source of intrusion in our neighborhoods. Newly built homes with an abundance of floor-to-ceiling windows and LED lighting, resemble “light boxes” that create significant glare. These more intense, commercial-style lighting effects, result in light that travels a significant distance, creating a negative impact on neighbors as far as 700+ feet away. The Hollywood Dell Civic Association has received numerous complaints from residents about this type of lighting.



There are several examples in the Hollywood Dell (see 4 photos above). These single-family residences have elaborate lighting systems that are often left on 24 hours a day.

Those who live within the sight line of the Project have very real concerns about light pollution. Commercial signage, and other exterior lighting as well as the interior lighting from the 1000+ units planned will have a massive visual impact from our neighborhood’s perspective. The presumption of the report that *“uses such as residences and hotels are considered light-sensitive since they are typically occupied by persons who have an expectation of darkness and privacy during evening hours”* does not address the concerns of those OUTSIDE the Project site. The assumption that all residents will have their curtains closed for *“privacy during evening hours”* is not a reality in practice. If that were the case, the houses in my neighborhood would not bother anyone with their interior lighting at night.

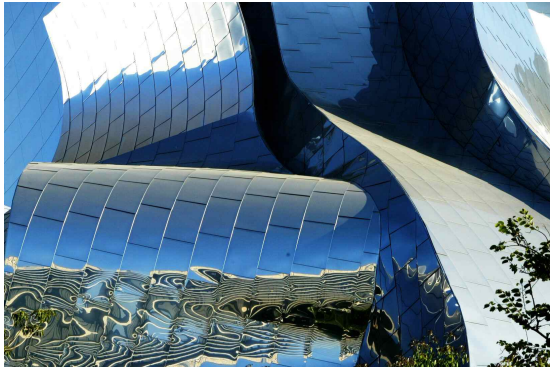
Why hasn’t the light pollution impact on the surrounding community of the Project site been included with this EIR?

Hollywood Dell Civic Association, P.O. Box 93094 Hollywood, CA 90093-0122

Once completed, fully lit, with lighted exterior signage and with the majority of the residences lit from inside without their curtains closed, how bright will this Project site be, when viewed from our hillside neighborhood to the north? What is the ability of the City of LA to monitor the impact of the Project site lighting once completed? What laws or ordinances apply?

According to the report:

“Glare is primarily a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass or reflective materials, and to a lesser degree, from broad expanses of light –colored surfaces. Glare can also be produced during evening and nighttime hours by artificial light directed toward a light sensitive land use. Activities, such as driving, and land uses such as parks and residences, are considered glare sensitive as the presence of glare could interfere with vision and/or result in an irritant to these activities/uses.”



After Disney Hall was completed in 2003, occupants in nearby DTLA buildings began to complain that the reflection of the sunlight increased heat inside their buildings. When the sun hit the stainless steel concert hall surface it reflected into nearby condominiums raising the temperature as much as 15 degrees.

Strong reflection from a large building can cause heat damage. Large expanses of windows that act like mirrors can focus and concentrate light and create “hot spots.” The sidewalks near Disney Hall had “hot spots” that measured up to 140 degrees F.

<https://www.latimes.com/archives/la-xpm-2004-feb-21-me-disney21-story.html>

Why hasn't the impact of a massive amount of reflection and heat on the neighborhoods in the hillside immediately north from this Project site been considered in the report? Why isn't the increased heat from this Project considered a potential significant environmental impact?

The DEIR (and the public and City) need detail photometric studies in a revised and recirculated DIER. The lack of them is a further failure of this DEIR. Those studies must analyze the impacts from light and glare to be able to advise mitigation measures and ensure that the project's light / glare impacts will be reduced to less than significant levels.

7. According to the report: *“The nearest public park, Selma Park at 6567 is located approximately 0.35 miles southwest of the Project site.”* This is incorrect (actually .42 miles). The Department of Recreation and Parks (RAP) has been operating and maintaining the Franklin Ivar Park at 6351 Franklin Avenue since July 1, 2018. The Board of Recreation and Park Commissioner's Board Report Dated July 17, 2019 (No. 19-139) states:

“SMMC, a state agency, is the sole owner of real property commonly referred to as the Franklin-Ivar Park (Park), a .75 acre passive park located at 6351 Franklin Avenue in the community of Hollywood, which opened to the public in 2017. SMMC had previously requested that RAP operate the Park on its behalf. This request was approved by the Board on June 11, 2018 (Report No. 18-148).”

Franklin Ivar Park is just a two blocks (.20 miles) from the Project site. It will certainly be the primary park utilized, during construction and by the Project's residents once the Project is completed. Why wasn't the Franklin Ivar Park included in the Project Analysis?

What is the potential impact on the Franklin Ivar Park caused by the temporary construction activities? What is the impact on the Franklin Ivar Park that would be generated by the long-term operation of the Project?

According to the report, "*Policy I – states that the desires of the local residents should be considered in the planning of recreational facilities.*" Local residents have met with the representatives of this project on numerous occasions and discussed neighborhood mitigations relating to park and recreation services, yet there's been no commitment by the applicant to address any of them.

Why doesn't the Development Agreement include a specific designation of some, or all of the Quimby Fee payment by the Project for the use of the Franklin Ivar Park, the nearest park to the Project? Quimby Fees could be utilized by the Franklin Ivar Park to improve lighting and security; purchase children's play equipment and shade structures, and fund Phase II of the Franklin Ivar Park plan. As the closest existing park to the Project site it should receive the bulk of the Quimby Fees from the Project to maintain and improve the park experience for the Hollywood community.

According to the report: "*The Project's entitlement applications, including its Vesting Tentative Map application, were deemed complete on April 10, 2018, subsequent to the Park Fee Ordinance becoming effective. As such, the Project is subject to the park fee provisions of the Park Fee Ordinance.*" Also noted in the report: "*On April 5, 2017, the RAP Board of Commissioners approved payment of in-lieu fees for the Project via a recommendation to the Advisory Agency.*"

How can the RAP Board of Commissioners approve payment in-lieu fees for the Project (April 5, 2017) before the Vesting Tentative Map is complete (April 10, 2018)? We would like an explanation. We would also like copies of the documents supporting this approval.

Will the RAP Board of Commissioners approve a new payment of in-lieu fees based on the Park Fee Ordinance in effect at the time the Vesting Tentative Map was completed?

Where is the Park Fee Calculation Application required for this project? We would like a copy.

According to the report: "*The commercial, retail and potential hotel uses are not considered to generate additional demand to park and recreational facilities.*"

How many people are expected to be on site at the commercial, retail or hotel properties on a daily basis? Why are these additional people (visitors and workers) not considered to generate additional demand to nearby parks and recreational facilities, especially those as close as the Franklin Ivar Park?

Considering the COVID-19 impacts, and the desire for safe outdoor recreation, how will the increased demand for park and outdoor recreation be addressed by the Project?

8. Water supply line breaks have been occurring over recent years across Los Angeles. Many parts of the water supply system have been in place for decades. About one-fifth of the City's water pipes were installed before 1931, when the population and water needs were a fraction of what they are today. Many may be beyond their useful life or in need of long deferred maintenance to extend their life. As recent as January 26, 2020, there was a water main break in Hollywood on Highland Blvd. As a result, a sinkhole formed, at least 21 businesses were impacted and roads were shut down. Hollywood Hills West, Mid-City and Hollywood account for the largest number of leaks in the city since 2010.

What is the increased potential for water supply line breaks over the next 20 years (2020 - 2040) given the water supply system is already antiquated and continues to age?

Currently there are six water lines located in the vicinity of the Project site based on the Utility Technical Report prepared for the project. The report states: "*The Project would only require new connections from existing facilities and*

would not be required to construct new distribution lines.” The Project’s water consumption once operational is projected to be 282,946 gallons per day (before required ordinances water savings) and 182,667 gallons per day (after required ordinances water savings plus voluntary water savings) as found in the Water Supply Assessment-Hollywood Center Project dated December 11, 2018. In addition, there are fire flow demands which have a much greater instantaneous impact on infrastructure and are important for analyzing capacity.

When were each of the existing six water lines first installed? What is the current age of each of the existing six water lines? What is the remaining useful life of each of the existing six water lines?

Have there been any line breaks or other water supply issues from each of the existing six water lines in the past 10 years? What volume of water, in gallons per day do these existing six water lines currently provide to the surrounding geographic properties that rely on their water supply from these six lines?

The geographic context for the cumulative impact analyses on the existing water infrastructure for the Project site includes 150 related projects. The estimated cumulative water demand of the 150 Related Projects is 9,524,310 gallons per day. This estimate is also cited in the report as “likely conservative” as the estimates do not account for code-required conservation or applicant conservation commitments. It is noted thought that the Project with East Site Hotel Option water demand is included in the estimated cumulative water demand as water demand net of required ordinances water savings and voluntary savings at 182,896 gallons per day. The gross water demand for the Project is 282,946 gallons per day, according to the Water Supply Assessment – Hollywood Center Project dated December 11, 2018.

The average water demand for each Related Project would be estimated at 63, 495 gallons per day (assuming the estimated cumulative water demand of the 150 Related Projects of 9,524,310 gallons per day which is conservative, assumed to be gross water demand, is divided by the 150 Related Projects). How does the Project rank in order by gross water demand gallons per day among the 150 Related Projects if the Project’s gross water demand is 282,946 gallons per day (which is observed to be 4.5 times the average water demand for the 150 Related Projects)?

If the Project is one of the top water demand projects on the existing water infrastructure, and LADWP, together with the City’s Department of Public Works, in ongoing evaluations determines the facilities are inadequate and infrastructure system improvements are needed, then what actions is the Project applicant likely required to implement during construction to improve the existing water supply infrastructure?

The future water supply includes a number of risks:

- a) The reliability of each water source identified in the LADWP Water Supply Table
- b) Ongoing disputes over the water supply sources
- c) Negative impact from the pattern of multiple dry-year conditions and drought (which have occurred in recent years)
- d) The potential for service interruptions caused by natural disaster (given that the proposed Project sits on an earthquake fault line)
- e) A service area reliability assessment for future water supply that is dependent on new water conservation as a supply source that has not yet been achieved (according to the Water Supply Assessment – Hollywood Center Project dated December 11, 2018).

If one or several of the risks above to the future water supply occurred (knowing that (a) through (c) have occurred in the past 7 years) during the 7-year construction phase, what risk mitigation steps will the Hollywood Center Project have in place to mitigate the risk(s)?

If one or several of the risks above to the future water supply occurred after the construction phase and the project is occupied, what risk mitigation steps will the Hollywood Center Project have in place to mitigate the risk(s)?

The Hollywood Center Project net water demand is estimated to be a maximum of 205 AF annually (or, 182,677 gallons per day) including water conservation, required by water conservation ordinances in the approximate

amount of 105 AFY (or, 93,701 gallons per day) and additional voluntary conservation measures in the approximate amount of 7 AFY (or, 6,568 gallons per day) according to the Water Supply Assessment – Hollywood Center Project dated December 11, 2018. The gross water demand before any water conservation (required by ordinances or voluntary) is project to be 282,946 gallons per day (or, 317 AFY – as we calculate) based on the Table in the Water Supply Assessment – Hollywood Center Project dated December 11, 2018. In a letter dated October 10, 2018, Mario Palumbo, Vice President - Hollywood Center Project states the Project has an applicant is committed to *“implement the following water conservation measures that are in addition to those required by codes and ordinances for the entire Project.”* His letter lists 13 measures from high efficiency toilets to landscaping design. For the 13 measures listed in the letter, the water savings have been provided based on LADWP estimates to achieve the additional voluntary water conservation savings of 7 AFY (or, 6,568 gallons per day). The October 10, 2018 letter also commits to comply with the City of Los Angeles Low Impact Development Ordinances by implementing a *“Capture and Reuse System through cisterns to treat LID volume.”*

What are (a) the list of required ordinances water savings measures in design, development and code that the Project will develop as required by codes and ordinances for the entire Project, and (b) how much will each measure achieve in AFY and gallons per day toward the aggregate required water conservation savings of 105 AFY (or, 93,701 gallons per day)?

How much water savings will be achieved in AFY and gallons per day by implementing the capture and reuse system through cisterns to treat LID volume committed to by the Project applicant in the letter dated October 10, 2018?

Will the lease agreements for tenants (market-rate and senior affordable dwelling units as well as all commercial tenants) state that the Tenant is responsible for their own water bill?

What language will be included in the lease agreements to require all tenants (dwelling units and commercial) adhere to water conservation ordinances to achieve the annual water savings of approximately 105 AFY that has been projected into the total net water demand for the Project referred to in the Water Supply Assessment – Hollywood Center Project dated December 11, 2018?

In 2015 the LADWP installed the Hollywood Temporary Corrosion Control Station in the Hollywood Dell at the point where Holly Drive, San Marco Drive and Deep Dell Place converge below the reservoir. The Station is comprised of two 12,000-gallon storage tanks that house ZINC ORTHOPHOSPHATE (ZOP). ZOP an additive to the water supply, and is used to coat the inside of aging water pipes to inhibit corrosion and leaching of metals like lead, copper and iron into our drinking water. Because the LADWP is a public entity, and this is a public utility facility, no Environmental Impact Report was required before this facility was installed. At the time, our neighborhood held a community meeting and we were told that there would be 4 – 14 deliveries per month to refill the storage tanks with ZOP. The chemical delivery trucks have a capacity of 1,500 – 2,000 gallons. We were also informed that the amount of deliveries would vary with water usage. (8.64) Where is the analysis of the impact on the Corrosion Control Station by the Project? How many additional delivery trucks will be lumbering through our residential neighborhood to accommodate the additional water usage generated by the Project?

9. According to the report the existing wastewater infrastructure around the Project consists of 3 pipes:

- A 12-inch vitrified clay pipe (VCP) within Yucca, between Ivar and Argyle that flows westward
- An 8-inch vitrified clay pipe (VCP) within Ivar Avenue, between Yucca and Hollywood Boulevard that flows southward
- A 12-inch vitrified clay pipe (VCP) within Ivar Avenue, between Yucca and Hollywood Boulevard that flows southward

The completed Project will have 1,104 units (combination of residential and hotel), retail spaces, office units, restaurants and lounge areas, a health spa and swimming pools. There are additional potential wastewater creators that are as yet undetermined as the report omits the possibility and/or probability that lessees might include restaurants, gyms, laundries, etc. – all high water use establishments. Yet, the determination of the report was that

“impacts would be less than significant” and that there would be no requirement of new or expanded water or water treatment facilities. No mitigation measures are recommended.

Even if the sewage treatment plant can take on the additional capacity from the Project without mitigations, why isn't the added burden to the infrastructure that carries the wastewater to the treatment facility considered in the report? What is the distance to the treatment facility?

Within the report the estimates of sewer usage are based exclusively on dry (non-rainy) days. Yet, the report also states that on wet days, the volume of wastewater can double! Why weren't calculations made based on the wet weather conditions?

Vitrified Clay Pipe (VCP) has a typical lifespan of 50 – 60 years. Vitrified Clay Pipe is also known to snap under extreme pressure. Older VCP is also susceptible to root intrusion and leaks. What is the age and condition of the existing pipes? (9.69) Where are the oldest / weakest points that the wastewater must travel to get to the treatment facility? Los Angeles is due for a major earthquake, and this Project is located near a known fault. (9.70) How can we be assured that the existing pipes carrying the wastewater can withstand the new higher burden from the Project and the potential impact from a significant earthquake event?

10. It is publically 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 the 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?

11. Residents of the Hollywood Dell Neighborhood live adjacent to the 101 Freeway and its noise. In 2013 the California Department of Transportation studied the noise level from 2025 Ivar Avenue, approximately 500 feet from the Project location. The Department of Transportation determined that the decibel level from the freeway exceeded acceptable levels and a sound wall was needed to mitigate. Does the DEIR evaluate the freeway noise impact on neighboring communities caused by the haul routes, cement and construction trucks and increases in traffic caused by the Project? How will the Hollywood Center builders mitigate this additional noise and pollution by those vehicles, during and after construction?

12. The Hollywood Dell Neighborhood is already impacted by traffic jams around the 101 freeway entrance ramps located near the Franklin Avenue and Argyle intersection. Cars back up in all directions around this critical intersection and essentially block residents of the Hollywood Dell from accessing our neighborhood as they sit through numerous lights. The Project site is just a block away from this critical intersection, and during construction the trucks that will be coming and going from the Project will be adding to this congestion. Alternate routes to the west, using Cahuenga Boulevard, will also impact already heavily traveled surface streets and obstruct access to the few other entry points into the Hollywood Dell (Cahuenga at Dix, Cahuenga at Odin, and Cahuenga at Cahuenga Terrace). And, our experience has been that often the public streets around major construction such as this Project will be closed frequently to traffic, pushing congestion into the surrounding area. Once the Project is complete, the added vehicle traffic from the occupants of the Project would be another burden on these highly congested, gridlocked streets. Why isn't there a traffic study of these very significant impacts in the DEIR?

Submitted by the Hollywood Dell Civic Association

Alexa Iles Skarpelos, HDCA President
David Brewer, HDCA Vice President
Kelly Ziegler, HDCA Treasurer
Jan Hohenstein, HDCA Secretary