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**Subject:** Hollywood Center Project Environmental Case: ENV-2018-2116-EIR State Clearinghouse No.:2018051002

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Please see attached files.

May 18, 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

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

Broadway Hollywood Building Stakeholder and Historic Resource: The building and sign are a 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 **deeply** flawed. The Project would result in significant irreversible direct and indirect impacts and avoidable operational impacts for the Broadway Hollywood Building at the corner of Hollywood and Vine.

The Broadway Hollywood Building Homeowners Association opposes this project as it is proposed.

- I. Specifically, the HOA requests that the City 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:
- 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 ?
  - Aesthetics threshold (b) substantial adverse effect on a scenic vista.

Below are the 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 fails to adequately explain how a proposed 1.3 million square foot project will have insignificant traffic impacts to the neighboring residences and businesses at Hollywood and Vine. Specifically, we request that a traffic study be conducted to take a focused approach on the various items approved in the April 10, 2020 LADOT memorandum (DEIR Appendix N-2) including, but not limited to, 1) the TDM Program and the assumptions that have been used to reduce trips in the VMT Calculator, and 2) a review of the Neighborhood Traffic Management Program, the Traffic Signal Warrant Analysis, Project Access, and Driveway Access and Circulation. In addition, 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 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.

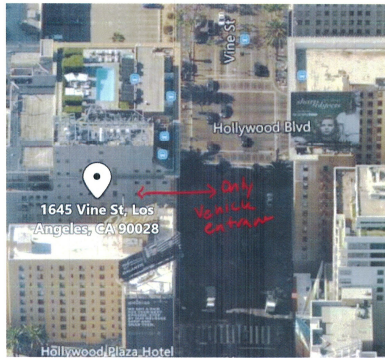


Figure 1: Bird's Eye view of only vehicle access point

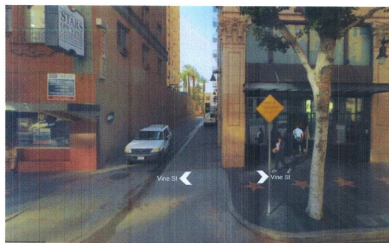


Figure 2 Street view of only vehicle access point

- II. Generally, The HOA asks the Broadway Hollywood Building to be included in the analysis regarding the following areas of project controversy/issues to be resolved as already identified and described in the EIR executive summary and noted below:
- Blocked views and shade impacts on nearby uses due to scale and massing of the Project
  - Impacts (noise, vibration, pollution) on the historic resources off-site
  - Land use inconsistencies between the Project and plans regulating the Project Site.
  - Increased traffic impacts and exacerbated parking conditions in the nearby area due to the Project.
  - Cumulative growth in the Hollywood area leading to gentrification
  - Increased stress on existing public services availability and aging infrastructure (e.g., wastewater, police, fire)
- III. The Broadway Hollywood building is a project off-site location and 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 is missing from the list of identified as impacted or potentially impacted 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.

- IV. There are project alternatives identified that the Broadway Hollywood Building HOA with additional consideration to the specific issues noted above 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 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.

I request that Alternative 2 be considered

Sincerely,

Cyrus Kashfian (Resident)

