

August 3, 2020

Jason McCrea, Planning Assistant  
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Re: Hollywood Wilcox Project  
1624-1648 Wilcox, 6430-6440 Hollywood  
Case Nos. VTT-74371 & CPC-2016-3176-VZC-HD-VCU-MCUP-SPR  
CEQA No. ENV-2016-3177-EIR

Dear Mr. McCrea,

I am writing to you to inform you of numerous deficiencies within the EIR prepared for the Hollywood Wilcox Project. The EIR has not been prepared in compliance with the law. There are numerous instances where the EIR has failed to provide important information regarding the Project's environmental context. There are also instances where the information provided in the EIR is clearly false. Overall, the authors of the EIR have failed to provide decision-makers with information adequate to enable them to make an informed decision regarding the Project's environmental consequences.

In its current state, the EIR is seriously deficient, and should not be adopted. Detailed comments are below.

Sincerely,  
Casey Maddren  
2141 Cahuenga Blvd., Apt. 17  
Los Angeles, CA 90068

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**Hollywood Wilcox Project**

**Comments on the EIR**

**Project Description**

The Project Description is deficient. While the EIR offers extensive descriptions of the Attie Building and the Hollywood Entertainment District, it fails to list numerous surrounding uses, including historic structures and sensitive receptors. Most glaringly, it makes no reference to the US Post Office on Wilcox, which is right across the street from the Project. This building is a significant example of art deco architecture, and it is listed on the National Register of Historic Places. While the building is briefly mentioned in the chapter entitled Cultural Resources, failing to mention this building in the inventory of surrounding uses, and the failure to discuss potential impacts from vibration during the excavation phase, is a major omission.

*Sensitive Uses and Sensitive Receptors within 500 Feet*

*Mark Twain Hotel, 1622 Wilcox, student dormitory*

*US Post Office, 1615 Wilcox, Listed on National Register of Historic Places*

*Hollywood Martial Arts Studio, 6411 Hollywood, offers classes for children and youth*

*Sensitive Uses and Sensitive Receptors within 750 Feet*

*Los Angeles LGBT Center, 1625 Schrader, offers health services for community, including seniors,*

*Apartment Building, 1611 Schrader*

*Selma Pocket Park, corner of Selma and Schrader*

*Selma Elementary School, 6611 Selma*

*Hollywood YMCA, 6550-6600 Selma, Listed on National Register of Historic Places, designed by Paul Williams, first black member of AIA*

*Triangle Square Apartments, 1602 Ivar, Senior Housing*

*Security Trust & Savings Building, 6381 Hollywood, Los Angeles Historic Cultural Monument*

**Air Quality**

The EIR lists the goals stated in the Air Quality Element of the General Plan. The data presented in this section makes it clear that the City has failed to make significant progress

toward some of these goals since the Air Quality Element was adopted in 1992. Among the goals cited in the EIR are:

***Good air quality in an environment of continued population growth and healthy economic structure;***

On page 20 we find the following text:

*(b) Existing Health Risk in the Surrounding Area*

*As shown in figure IV.A-2 on page IV.A-23, based on the MATES-IV model, the calculated cancer risk in the Project area is approximately 1,150 in a million.*

This shows that the Project Area is at the high end of the MATES spectrum, and that cancer risk from air pollution is relatively high. The authors seem to be trying to downplay this fact with the following statement:

*The cancer risk in this area is predominately related to nearby sources of diesel particulate (e.g., the US-101 freeway). In general, the risk at the Project Site is comparable with other urbanized areas in Los Angeles.*

In other words, air quality in most urbanized areas in Los Angeles is bad, and cancer risk is high. This clearly shows that, in the 28 years since the Air Quality Element was adopted, the City has failed to achieve the goal of "good air quality". This is largely because the City has failed to accurately assess the impacts of continued development and has made no serious effort to monitor progress (or lack of progress) in improving air quality.

Here's another one of the Air Quality Element Goals:

**Less reliance on single-occupant vehicles with fewer commute and non-work trips**

While the City has claimed repeatedly that projects like this will encourage drivers to let go of their cars and utilize transit, the City has made no progress in this area. In fact, transit ridership in the Project Area and across Los Angeles has been declining since 2013. Ridership on Metro lines that serve the Project has fallen dramatically in recent years. LADOT has refused to release ridership data for individual DASH lines, but overall DASH ridership has declined steadily since 2013. This is in spite of the fact that the City has approved numerous high-density projects in close proximity to transit.

The UCLA report Falling Transit Ridership not only documents the steep declines in transit ridership, but also shows that car ownership has increased dramatically since the year 2000.

*Falling Transit Ridership from UCLA Institute of Transportation Studies*  
[https://www.scag.ca.gov/Documents/ITS\\_SCAG\\_Transit\\_Ridership.pdf](https://www.scag.ca.gov/Documents/ITS_SCAG_Transit_Ridership.pdf)

This shows that the City has absolutely failed to achieve the goal of "less reliance on single-occupant vehicles". The authors of the EIR offer zero evidence to support their claims that this Project will encourage transit ridership. They also offer zero evidence that the inclusion of bike racks will lead residents to choose bicycles over cars.

One more stated goal of the Air Quality Element is:

**Minimal impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation and air quality;**

The City continues to make facile arguments about "addressing the relationship between land use, transportation and air quality" without actually achieving anything. City Planning staff pontificate endlessly about Transit Oriented Development and Transit Neighborhood Plans while ignoring overwhelming evidence that their efforts to reduce reliance on cars have been a miserable failure.

#### Thresholds of Significance

The EIR states that there would be a significant impact if the project would:

**Conflict with or obstruct implementation of the applicable air quality plan.**

This Project absolutely conflicts with the goals of the Air Quality Element of the General Plan. The data in the EIR demonstrates that the City is in non-attainment under the California Standard for Ozone, PM 10 and PM 2.5, and that the City is in non-attainment under the Federal Standard for PM 2.5 (serious) and Ozone (extreme). Because the City has failed to set well-defined goals for improving air quality and also failed to monitor progress toward those goals, citizens continue to suffer from poor air quality. The data given in the EIR shows that, in fact, there are significant health risks associated with the City's poor air quality. Rather than make a serious effort to assess the impacts of new development on air quality, the City continues to recklessly approve new development with zero accountability.

Under thresholds of significance, the EIR asks would the Project...

**Expose sensitive receptors to substantial pollutant concentrations.**

Both during construction and operation that project will expose sensitive receptors to substantial pollutant concentrations. Included among these sensitive receptors are:

*Mark Twain Hotel, 1622 Wilcox, student dormitory*

*Hollywood Martial Arts Studio, 6411 Hollywood, offers classes for children and youth*

*Los Angeles LGBT Center, 1625 Schrader, offers health services for community, including seniors*

*Apartment Building, 1611 Schrader*

*Selma Pocket Park, corner of Selma and Schrader*

*Selma Elementary School, 6611 Selma*

*Hollywood YMCA, 6550-6600 Selma*

*Triangle Square Apartments, 1602 Ivar, Senior Housing*

Project construction is estimated to take approximately 24 months, the excavation expected for the parking would be up to 40 feet below grade, and approximately 58,000 cubic yards of soil would be hauled from the Project Site.

The EIR's claim that the thousands diesel truck trips necessary to complete this task, plus the excavation of 58,000 cubic yards of soil, would cause no significant impacts on sensitive receptors is not credible. While all the uses listed above will be impacted, clearly the student dormitory housed in the Mark Twain Hotel will be the most severely impacted. It is absurd to think that two years of construction, involving diesel trucks and the displacement of 58,000 cubic yards of soil, would have no air quality impact on this sensitive receptor.

In addition, the chapter of the EIR devoted to Public Services/Police Protection lists 107 projects either being considered or currently under construction. This means cumulative air quality impacts over time would be considerable.

The conclusion that no mitigation measures are required is ridiculous, and calls into question the expertise and the judgment of the authors of the EIR.

### **Cultural Resources**

While the EIR spends a good deal of time discussing the Attie Building, and offers a general and superficial review of the Hollywood Commercial and Entertainment District, it is still incomplete in important respects.

The EIR only gives the most cursory review of the US Post Office, directly across the street from the Project Site.

*US Post Office, 1615 Wilcox, Listed on National Register of Historic Places, directly across from project site, art deco building designed by Claud Beelman*

The EIR fails to discuss any possible construction impacts to the US Post Office, most importantly vibration resulting from the excavation and removal of 58,000 cubic yards of soil. This process will involve the operation of heavy machinery over a period of months, and could easily cause damage to this classic art deco building. The EIR's failure to assess impacts to this structure is a serious omission.

The EIR also fails to mention the following cultural resources in close proximity to the project site:

*Hollywood YMCA, 6550-6600 Selma, Listed on National Register of Historic Places, designed by Paul Williams, first black member of AIA, approximately 550 ft from project site*

*Security Trust & Savings Building, 6381 Hollywood, Los Angeles Historic Cultural Monument, approximately 500 ft from project site*

In failing to mention these buildings, one on the National Register and one a City of Los Angeles HCM, the authors have failed to comply with the requirements of CEQA. The Cultural Resources section of the EIR is deficient and invalid.

### **Public Services/Police**

The EIR says that the population of the Hollywood Division service area is 300,000. This is incorrect. While recent environmental assessments for projects in the Hollywood area have also used this number to discuss crime statistics, the actual population served by the Hollywood Division is approximately 165,000. Interestingly, the City routinely used the 165,000 figure up through 2018. The Hollywood Gower EIR, released in September 2018, calculates per capita crime rates based on a population of 165,000 persons served by Hollywood Division.

At some point after 2018, the City began to use the incorrect 300,000 figure, which is almost double the actual population served by Hollywood Division. Interestingly, the Hollywood Community Plan Update EIR also says that 300,000 people are served by the Hollywood Division, even though the EIR's Summary says that the population of the entire Hollywood Community Plan Area in 2016 was 206,000. In other words, the EIR for the HCPU Update claims that Hollywood Division serves almost 50% more people than are actually contained in

the Hollywood Community Plan area. This would be funny, if it weren't such a typical example of the shoddy work that Hollywood residents have come to expect from the City of Los Angeles.

The City's inability to get its facts straight is highlighted by the fact that the EIR for the 6220 West Yucca Project, released in April 2020, states that the population served by the Hollywood Division is 165,000 residents. The residents of Hollywood long ago stopped expecting honesty from the City of Los Angeles, but the City would be doing itself a huge favor if it would at least try for consistency.

To be clear, the correct population for the area served by the LAPD's Hollywood Division is approximately 165,000 residents.

It seems that the City's motive in jacking up the population figures was to reduce the per capita crime rate.

Based on the 300,000 population figure given in its Public Services/Police section, the Hollywood Wilcox EIR gives the following per capita crime rates for Hollywood and the entire City of LA.

*Citywide.*  
*0.0300 crimes per capita*

*Hollywood*  
*0.0207 crimes per capita*

This makes it appear that the per capita crime rate in Hollywood is about 60% of the Citywide rate.

But when we use the correct 165,000 population figure for the Hollywood area, it makes quite a difference.

*Citywide.*  
*0.0300 crimes per capita*

*Hollywood*  
*0.0377 crimes per capita*

In other words, contrary to the EIR's ridiculous assertion that crime in Hollywood is well below the Citywide average, in fact, crime in Hollywood is far higher than the Citywide average. This is a basic truth that every Hollywood resident knows. One wonders when the City of Los Angeles will have the decency to acknowledge this simple fact.

### Thresholds of Significance

Under Thresholds of Significance, the EIR states that impacts would be significant if there would be a need for new or physically altered police facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios.

Table IV.H.2-3, Estimated Service Population from Related Projects within Hollywood Service Area, lists over 100 projects that are planned for the Hollywood area. At the bottom of the table, under Related Projects Residential Service Population, it estimates that these projects would add an additional 52,720 residents to the Hollywood Service Area. In other words, cumulatively these projects could increase the Hollywood Service Area's population by about 32%, to say nothing of the additional tourist population as result of numerous hotel projects.

It seems very likely that this additional burden on the Hollywood Division could require upgrades or new construction at the Hollywood Division Police Station on Wilcox, which, aside from a seismic upgrade in 2003, does not appear to have enhanced its facilities since 1983. A population increase of this magnitude could also require additional vehicles or other equipment. The EIR completely fails to assess cumulative impacts on police service due to the many projects approved and proposed in the Hollywood area.

### **Other CEQA Considerations/Solid Waste**

Interestingly, the authors of the EIR relegate their discussion of solid waste to a chapter entitled Other CEQA Considerations. Is this because they wish to avoid a detailed discussion of the City's abject failure to comply with State law?

The EIR claims that the project would comply with AB 939, a State law requiring cities to divert a minimum of 50% of their solid waste to recycling. This project will be served by the City's RecycLA program. As a result of the current solid waste crisis in California, the City has been unable to continue its previous practice of shipping solid waste to foreign countries. In 2019 the City Council approved renegotiated contracts with the companies that implement the RecycLA program. A story published in WasteDive at the time ("New RecycLA settlement: Relaxed hauler targets, \$9M in customer relief", Feb. 14, 2019) makes it clear that the City is a long way from complying with AB 939. Here's a quote:

*Los Angeles still has a stated goal of 90% landfill diversion by 2025, but the city has revised its RecycLA contract target from 45% to 35% diversion by 2023. A lack of recent data (another RecycLA priority) makes it hard to assess where that diversion rate currently stands.*