



August 11, 2020

MEMORANDUM

TO: JASON MCCREA, CITY OF LOS ANGELES

FROM: EYESTONE ENVIRONMENTAL

RE: HOLLYWOOD & WILCOX LATE DRAFT EIR COMMENT LETTERS

The comment period on the Hollywood & Wilcox Draft EIR closed on April 13, 2020, and the Final EIR was published on July 31, 2020. Comments on the Final EIR are not required to be responded to by the City. Comment Letter Nos. 10 and 11 below were received in early August 2020, well after the close of the Draft EIR comment period. Nevertheless, because they are comments on the Draft EIR rather than Final EIR, Eystone Environmental has prepared responses. As detailed below, none of the issues raised require new or different assessment of the Project's entitlement requests or recirculation of the Draft EIR.

Comment Letter No. 10

Casey Maddren
2141 Cahuenga Blvd., Apt. 17
Los Angeles, CA 90068-2781

Comment No. 10-1

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.



Jason McCrea
CITY OF LOS ANGELES
August 11, 2020 – Page 2

Response to Comment No. 10-1

This comment introduces the letter and states the commenter's belief that the Draft EIR does not meet the requirements of CEQA. Responses to specific issues raised are addressed below in Response to Comment Nos. 10-2 through 10-12. As detailed therein, the issues raised by the commenter are fully analyzed in the Draft EIR.

Comment No. 10-2

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 [sic] 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



Jason McCrea
CITY OF LOS ANGELES
August 11, 2020 – Page 3

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

Response to Comment No. 10-2

The discussion of surrounding uses on page II-3 of Section II, Project Description, of the Draft EIR, describes the setting of the Project Site and is not intended to list all potentially sensitive receptors or historic properties. Sensitive receptors and historic properties are discussed in the appropriate Draft EIR sections including Section IV.A, Air Quality; Section IV.B, Cultural Resources; and Section IV.G, Noise.

With respect to the comment that these uses were not analyzed for vibration impacts, noise sensitive receptors for the Project noise impact analysis were selected based on the *L.A. CEQA Thresholds* Guide, including the screening distance (i.e., within 500 feet of the Project Site) and the noise-sensitive classification. As described on page IV.G-11 of Section IV.G, Noise, of the Draft EIR, six noise receptor locations were selected to represent noise-sensitive uses within 500 feet of the Project Site. The noted Hotel Mark Twain at 1622 Wilcox Avenue is included in the noise analysis as receptor location R1. The selected noise receptor locations are representative of the noise-sensitive uses surrounding the Project and provide an adequate basis to evaluate potential noise impacts at receptors beyond in the same direction. It is not intended to include all potential noise-sensitive receptors within 500 feet of the Project Site. The noted Los Angeles LGBT Center at 1625 Schrader Boulevard, the Apartment building at 1611 Schrader Boulevard, the Selma Pocket Park at the corner of Selma and Schrader, and the Selma Elementary School at 6611 Selma are located west of Schrader Boulevard (west of the Project Site), would be represented by receptor location R3 (located the east side of Schrader Boulevard). The Triangle Square Apartments at 1602 Ivar Avenue is located further east from the Project Site, which would be presented by receptor location R6 (located on Cosmo Street, west of Ivar Avenue). The noted Martial Arts Studio is located on the north side of Hollywood



Jason McCrea
CITY OF LOS ANGELES
August 11, 2020 – Page 4

Boulevard, which would be represented by receptor location R4 (located on the north side of Hollywood Boulevard). In addition, the Martial Arts Studio would mostly be shielded to the Project Site by the existing commercial buildings on the south side of Hollywood Boulevard. Therefore, noise impacts from the Project to the Martial Arts Studio would be similar to receptor location R4, less than significant.

As described on page IV.G-56 of Section IV.G, Noise, of the Draft EIR, ground-borne vibration decreases rapidly with distance, and potential vibration impacts associated with potential building damage due to construction activities are generally limited to buildings/structures that are located in close proximity of the construction site; i.e., within 15 feet. As discussed on page IV.G-44 of Section IV.G, Noise of the Draft EIR, with the exception of the on-site Attie Building, there are no other historic buildings within 15 feet of the Project Site. The noted historic buildings—the U.S. Post Office (at 1615 Wilcox Avenue), the Hollywood YMCA (at 6550–6600 Selma Avenue), and the Security Trust & Saving Building (at 6381 Hollywood Boulevard)—are approximately 90 feet, 580 feet, and 300 feet from the Project Site, respectively. As shown in Draft EIR Table IV.G-21, based on the reference FTA vibration level of 0.089 PPV at 25 feet and distance attenuation, the vibration levels at the noted buildings would be well below the 0.12 PPV significance threshold applicable to historic buildings (see Attachment A to this memorandum). In addition, the ground-borne vibration due to construction trucks along the haul routes, including, Wilcox Avenue (adjacent to the U.S. Post Office building) and Hollywood Boulevard (adjacent to the Security Trust & Saving building) would be 0.022 PPV (see page IV.G-46 of Section IV.G, Noise, of the Draft EIR). The estimated ground-borne vibration from the Project on-site construction activities and off-site construction trucks would be well below the 0.12 PPV significance threshold applicable to historic buildings (see page IV.G-21 of Section IV.G, Noise, of the Draft EIR). As such, the ground-borne vibration impacts at the US Post Office building, the Hollywood YMCA, and the Security Trust & Saving building would be less than significant.

Comment No. 10-3

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:

Jason McCrea
CITY OF LOS ANGELES
August 11, 2020 – Page 5

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”. [sic] 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.

Response to Comment No. 10-3

This is a general comment repeating information provided by the South Coast Air Quality Management District (SCAQMD) regarding air quality in the Project area. The comment also identifies that the background/existing cancer risk in the area is predominantly attributed to emissions from the Hollywood Freeway. However, the City has limited control over vehicle emissions along freeways. In order to improve air quality and achieve air quality goals within the State, the California Air Resources Board (CARB) has developed rules to control emissions from vehicles. Such requirements include increasing sales of zero-emission vehicles and phasing out older heavy-duty trucks over time. As a result of more stringent vehicle emissions standards, air quality near freeways is expected to improve over time. While the City has



Jason McCrea
CITY OF LOS ANGELES
August 11, 2020 – Page 6

developed the Air Quality Element, SCAQMD and CARB are responsible for implementing policies to improve air quality within the region.

Comment No. 10-4

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

This shows that the City has absolutely failed to achieve the goal of “less reliance on single-occupant vehicles”. [sic] 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.

Response to Comment No. 10-4

This comment states that Metro and DASH ridership has recently declined. While this claim may be supported by the study cited by the commenter, this information does not invalidate the fact that the Project Site is located within a Transit Priority Area pursuant to SB 743 and within a designated High Quality Transit Area under the Southern California Association of Government's (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Any adjustments to these designations based on transit ridership would



Jason McCrea
CITY OF LOS ANGELES
August 11, 2020 – Page 7

be the responsibility of the City or SCAG and not individual projects. Nevertheless, this comment is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment No. 10-5

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.

Response to Comment No. 10-5

As discussed above in Response to Comment No. 10-4, any adjustments to the Project Site’s designations based on transit ridership would be the responsibility of the City or SCAG and not individual projects. Nevertheless, this comment is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment No. 10-6

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 [sic] and PM 2.5, [sic] and that the City is in non-attainment under

Jason McCrea
CITY OF LOS ANGELES
August 11, 2020 – Page 8

the Federal Standard for PM 2.5 [sic] (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.

Response to Comment No. 10-6

Although the City, as part of its Air Quality Element, has developed goals to improve air quality, SCAQMD is the regulatory agency responsible for achieving air quality attainment in the region. Please refer to page IV.A-10 in Section IV.A, Air Quality, of the Draft EIR, for a discussion of SCAQMD's responsibilities.

Regional significance thresholds established by SCAQMD take into account emissions from individual projects and the effect on achieving attainment within the region. As demonstrated in Table IV.A-5 (Construction) and Table IV.A-6 (Operations), the Project would be well below SCAQMD regional thresholds (see pages IV.A-48 and IV.A-49 in Section IV.A, Air Quality, of the Draft EIR, respectively).

In addition, as discussed on page IV.A-41 of Section IV.A, Air Quality, of the Draft EIR, the Project would comply with control measures set forth within SCAQMD's Air Quality Management Plan (AQMP). The AQMP was developed by SCAQMD to achieve air quality attainment in the region and improve air quality. As demonstrated in pages IV.A-41 through IV.A-45 of Section IV.A, Air Quality, of the Draft EIR, the Project would be consistent with the goals and policies of the AQMP and the City's Air Quality Element.

Comment No. 10-7

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:



Jason McCrea
CITY OF LOS ANGELES
August 11, 2020 – Page 9

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.

Jason McCrea
CITY OF LOS ANGELES
August 11, 2020 – Page 10

Response to Comment No. 10-7

As discussed on pages IV.A-51 through IV.A-56 of Section IV.A, Air Quality, of the Draft EIR, an analysis of the Project's construction and operational localized emissions was performed to identify impacts to nearby sensitive receptors. The analysis was performed using the SCAQMD Localized Significance Threshold (LST) look-up table methodology which is based on the Project's distance to sensitive receptors. As shown in Tables IV.A-7 and IV.A-8 on pages IV.A-53 and IV.A-54 of Section IV.A, Air Quality, of the Draft EIR, the Project's localized construction and operational emissions would result in a less than significant impact at the sensitive receptors closest to the Project Site (adjacent residential uses south of the Project). As SCAQMD LST look-up thresholds are based on the Project's distance to sensitive receptors, other receptors located further away from the Project Site would also result in less than significant impacts. While some of the receptors mentioned in this comment would not be considered sensitive under the AQMD's definition provided in the CEQA Air Quality Handbook, localized air quality impacts during Project construction and operational activities would be less than significant at any of the receptors mentioned in the comment. With respect to cumulative impacts, Section IV.A, Air Quality evaluated cumulative impacts under Threshold (b) and in Subsection e. Cumulative Impacts. As evaluated therein, impacts were found to be less than significant without mitigation.

Comment No. 10-8

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

Jason McCrea
CITY OF LOS ANGELES
August 11, 2020 – Page 11

easily cause damage to this classic art deco building. The EIR's failure to assess impacts to this structure is a serious omission.

Response to Comment No. 10-8

As described on page IV.G-56 of Section IV.G, Noise, of the Draft EIR, ground-borne vibration decreases rapidly with distance. Potential vibration impacts associated with building damage due to construction activities are generally limited to buildings/structures that are located in close proximity of the construction site; i.e., within 15 feet. The U.S. Post Office building is located on the west side of Wilcox Avenue, approximately 90 feet southwest of the Project Site. The ground-borne vibration levels, due to the Project-related on-site construction activities, at the U.S. Post Office building would be maximum 0.013 PPV. In addition, the ground-borne vibration due to construction trucks (haul and delivery trucks traveling on Wilcox Avenue) would be approximately 0.022 PPV at the U.S. Post Office Building. Therefore, the estimated ground-borne vibration from the Project on-site construction activities and off-site construction trucks would be well below the 0.12 PPV significance threshold applicable to historic buildings. As such, the ground-borne vibration impacts at the US Post Office building would be less than significant.

Comment No. 10-9

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.



Jason McCrea
CITY OF LOS ANGELES
August 11, 2020 – Page 12

Response to Comment No. 10-9

Hollywood YMCA, which also has the address 1553 Schrader Boulevard, was first assessed for historic significance in 1991 through a Section 106 process and was given the California Historical Resource Status Code of 2S2, which means, “Individual property determined eligible for NR [National Register of Historic Places] by consensus through a Section 106 process. Listed in the CR [California Register].” This finding was confirmed through a Section 106 process in 1998. Since that time, there has been no nomination to or listing in the National Register. The commenter is incorrect that the Hollywood YMCA is listed in the National Register.

As it is listed in the California Register, the Hollywood YMCA is a historical resource under CEQA. However, it is located some distance from the Proposed Project (approximately 0.33 mile). Located at the southwest corner of Schrader Boulevard and Selma Avenue, the Hollywood YMCA has no direct visibility to or from the Project Site. The DEIR and accompanying Cultural Resources Report considered direct and indirect impacts to adjacent and nearby historical resources. The neighborhood of Hollywood has a rich history and many historical resources, as well as much new construction. Given the distance and lack of visibility, and not to mention two buildings currently under construction between the two sites, the Hollywood Boulevard YMCA is geographically too far to even consider potential indirect impacts.

As for the Security Trust and Savings Building, located at 6367–6385 Hollywood Boulevard, while it is individually listed as a Historic Cultural Monument, is also a contributing resource to the Hollywood Boulevard Commercial and Entertainment Historic District. Direct and indirect impacts to the Hollywood Boulevard Historic District, including specifically the Security Trust and Savings Building, were studied in detail in the DEIR and accompanying Cultural Resources Report (see Draft EIR, Section IV.B, Cultural Resources, pages IV.B-35 through IV.B-37 and Appendix D.1, Cultural Resources Report, pages 34–35). That analysis concluded “the Project would not cause direct or indirect impacts to historic resources, including the Hollywood Boulevard Commercial and Entertainment District.” (See Draft EIR, Section IV.B, Cultural Resources, page IV.B-37.)



Jason McCrea
CITY OF LOS ANGELES
August 11, 2020 – Page 13

Comment No. 10-10

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.



Jason McCrea
CITY OF LOS ANGELES
August 11, 2020 – Page 14

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.

Response to Comment No. 10-10

This comment states that the population figure included in Table IV.H.2-1 is inflated. The 300,000 population figure was provided by the LAPD in their letter dated October 5, 2017, which is included as Appendix K of the Draft EIR. This figure also matches the LAPD website as of August 2020.¹

¹ LAPD, About Hollywood, www.lapdonline.org/hollywood_community_police_station/content_basic_view/1665, accessed August 7, 2020.

Jason McCrea
CITY OF LOS ANGELES
August 11, 2020 – Page 15

Comment No. 10-11

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.

Response to Comment No. 10-11

Both Project-level and cumulative impacts with respect to police protection are fully evaluated in Section IV.H.2, Public Services—Police Protection, of the Draft EIR and impacts were found to be less than significant. Pursuant to *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, 843, the potential need for additional public safety services is not an environmental impact that CEQA requires a project proponent to mitigate.

Nevertheless, as discussed therein, while the Project would result in minor increases in service population and number of crimes, it would also include Project Design Features POL-PDF-2 through POL-PDF-6 to enhance safety within and immediately surrounding the Project Site. In addition to the implementation of these project design features, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax revenue, etc.) that could be applied toward the provision of new police facilities and related

Jason McCrea
CITY OF LOS ANGELES
August 11, 2020 – Page 16

staffing in the community, as deemed appropriate. The Project's design features, as well as the Project's contribution to the General Fund, would help offset the Project-related increase in demand for police services.

With respect to cumulative impacts, as discussed in Section IV.H.2, Public Services—Police Protection, of the Draft EIR, while the Project and related projects could result in an increase in demand for LAPD services, the Project is only a small fraction of this increase, and the Project's incremental impact is not cumulatively considerable. In addition, similar to the Project, each related project would be subject to the City's routine construction permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. In accordance with the police protection–related goals, objectives, and policies set forth in the Framework Element, as listed in the regulatory framework above, the LAPD would also continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, the LAPD's resource needs would be identified and monies allocated according to the priorities at the time.² In addition, it is anticipated that the related projects would implement project design features similar to the Project, which would reduce cumulative demand for police protection services. Furthermore, the Project, as well as the related projects, would generate revenues to the City's General Fund (in the form of property taxes, sales tax revenue, etc.) that could potentially be applied toward the provision of new facilities and related staffing, as deemed appropriate.

Comment No. 10-12

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

² City of Los Angeles, Budget for the Fiscal Year 2017–18.

Jason McCrea

CITY OF LOS ANGELES

August 11, 2020 – Page 17

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”, [sic] 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% land’fill [sic] 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.

Response to Comment No. 10-12

This comment states that the City is not meeting its diversion goals under Assembly Bill (AB) 939. Under AB 939, waste diversion is the responsibility of jurisdictions, not individual persons or projects. While not specifically applicable to the Project, the Project would be consistent with the intent of AB 939 by providing recycling collection on-site. Specifically, the Applicant has included appropriate recycling and composting collection facilities in the design of the Project so that these materials can be easily disposed of by residents and employees and easily collected by the various solid waste collection and disposal companies that serve the Project Site. Specifically, trash/recycling rooms would be provided on the ground floor, parking level P1, and throughout the residential floors, and the Project would comply with PRC Sections 42649 and 42649.8 by providing clearly marked receptacles for commercial and organic recycling. The Applicant will arrange for commercial and organic recycling services following Project approval. The trash/recycling rooms would be sized in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687). Specifically, the trash/recycling rooms included in the Project would comprise 2,200 square feet, exceeding the 100 square feet required by the ordinance. Furthermore, during construction, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris consistent with PRC Section 42912.

Thus, the Project will be required to comply not only with the PRC requirements for commercial and organic waste recycling, but also with the requirements requiring recycling during construction. The Project would also comply with City of Los Angeles Space Allocation Ordinance requirements for the trash/recycling rooms.



Jason McCrea
CITY OF LOS ANGELES
August 11, 2020 – Page 18

The Project would also comply with applicable laws and regulations during construction. Ordinance 181,519 requires that construction and demolition waste generated within the City be taken to a City-certified construction and demolition waste processing facility and pursuant to SB 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Nevertheless, this comment is noted for the record and will be forwarded to the decision makers for their review and consideration.



Jason McCrea
CITY OF LOS ANGELES
August 11, 2020 – Page 19

Comment Letter No. 11

William A. Miller
nyc.bill@aol.com

Comment No. 11-1

MY COMMENT .. [sic]

Hollywood & Wilcox Project
1624–1648 Wilcox..6430–6440 Hollywood Blvd.
ENV-2016-3177-EIR

Thank you.

THIS IS BEYOND HORRIBLE! IT'S GROTESQUE! LOVE THE YELLOW STRIPES!

ALMOST AS BAD AS NO DESIGN, UGLY, NO CHARACTER, OVERSIZED SKYSCRAPERS IN FRONT OF AND BLOCKING THE ICONIC HCM, CAPITOL RECORDS BUILDING.

THE CITY LOVES UGLY OVERSIZED BUILDINGS TOWERING OVER HISTORIC BUILDINGS, THAT WILL COLLAPSE ON THEM, AND THEY WONT HAVE A CHANCE OF SURVIVING, WHEN THE BIG ONE HITS, AS PER WELL RESPECTED STATE GEOLOGISTS, DR. JOHN PARRISH AND TIM McCRINK.

HAVE YOU PEOPLE NO CONSCIENCE?

YOU CANT BE SERIOUS!

YOU'RE RUINING HOLLYWOOD!

IT LOOKS LIKE AN INSANE PERSON DESIGNED THIS.

HAS LeFRAK EVEN BEEN TO HOLLYWOOD?



Jason McCrea
CITY OF LOS ANGELES
August 11, 2020 – Page 20

INSANE NON PLANNING DEPT. AND INSANE DISTRICT COUNCILMEMBER ARE INSANE TO ALLOW IT.

HOW CAN YOU ALLOW THIS OUT OF CONTEXT GARBAGE TO TOWER OVER HISTORIC HOLLYWOOD BLVD. BUILDINGS, THAT YOU HAVE NEGLECTED FOR YEARS, AND BE PLOPPED INTO THE 'NATIONAL REGISTER HOLLYWOOD BLVD. HISTORIC DISTRICT'

LeFRAK, TRUMP'S GOOD BUDDY, MUST HAVE HIS CITIES MIXED UP.

THIS LOOKS LIKE HIS MIAMI PROJECTS...MIAMI COMES TO HOLLYWOOD!

IS THERE ANYONE OVERSEEING DESIGN IN THIS CITY OR ARE YOU ALL PAID OFF TO LOOK THE OTHER WAY AND ALLOW DEVELOPER BOSSES TO DO WHATEVER THEY WANT.. [sic]

OBVIOUSLY FUNDED BY THIS DEVELOPER, AS USUAL, TO SELL OUT HISTORIC HOLLYWOOD.

YOU SHOULD ALL BE ASHAMED.

WILCOX, CAHUENGA ARE ALL IN GRIDLOCK NOW.

THIS GREEDY DEVELOPER SELL OUT, OVERDENSIFYING WITH NO INFRASTRUCTURE TO SUPPORT IT, IS DESTROYING HOLLYWOOD AND ABUSIVE TO THOSE WHO LIVE IN OR TRAVEL THROUGH IT.. [sic]

THERE'S A BEAUTIFUL HISTORIC POST OFFICE ACROSS THE STREET ON WILCOX, THAT WILL LOOK LIKE A PIN COMPARED TO THIS MONSTER, AND HISTORIC MARK TWAIN HOTEL NEXT DOOR THAT WILL BE UNDER THIS MONSTER.

AND WHEN WILL YOU BE DEMOING THE BEAUTIFUL HISTORIC CULTURAL MONUMENT 'HOLLYWOOD PACIFIC THEATRE' SO MORE GARBAGE LIKE THIS CAN GO UP.

HOW MANY OTHER BEAUTIFUL HOLLYWOOD BLVD. LANDMARKS BOARDED UP FOR HOW MANY MORE YEARS UNTIL THEY ALL GET "DEMOED BY NEGLECT" AND



Jason McCrea
CITY OF LOS ANGELES
August 11, 2020 – Page 21

REPLACED WITH THIS GARBAGE....WHICH WILL BE SO AESTHETICALLY APPEALING TO LOOK AT SIPPING CAPPUCCINO AT OUTDOOR CAFES, WHEN [sic] HEART OF HOLLYWOOD IS DONE.

HOLLYWOOD IS OVER.

*TARANTINO'S ACADEMY AWARD WINNING DESIGNER EVEN SAID SO.. [sic]

IT WAS SHOCKING TO THEM HOW FAST EVERYTHING IS COMING DOWN AROUND HOLLYWOOD AND BEING DESTROYED FOR GENERIC OVERSIZED GARBAGE, AND SHE SAID NO ONE WILL BE FILMING HERE IN THE FILM CAPITOL ANYMORE.

WHY WOULD ANYONE COME HERE TO SEE GARBAGE THEY CAN SEE ANYWHERE ELSE?

HOLLYWOOD BLVD. HAS BEEN TURNED INTO THE BOARDED UP AND GRAFFITTIED [sic] SOUTH BRONX.

IT IS A REFLECTION OF VERY VERY BAD 'NON' LEADERSHIP.

WHILE YOU DESTROY HOLLYWOOD HISTORIC RESOURCES, AND ABUSE AND WIPE OUT HOLLYWOOD 'S HISTORIC ICONS, LIKE THE ICONIC CAPITOL RECORDS BUILDING, FOR DEVELOPERS FUNDING POLITICAL CAREERS, AND BEAUTIFUL HISTORIC BUILDINGS ALONG THE BLVD. SIT NEGLECTED, BOARDED UP, AND ROTTING AWAY, FOR YEARS!!

AS FAUX HOLLYWOOD, HEART OF HOLLYWOOD MOVES FORWARD.

HOW ABOUT JUST FIXING THE MESS YOU'VE CREATED ON HOLLYWOOD BLVD.

WHERE OH WHERE IS HISTORIC HOLLYWOOD?

OH, THAT'S RIGHT, UNDERNEATH AND BEHIND THOSE UGLY, OVERSIZED MONSTER NO DESIGN YELLOW STRIPED HORRORS, THAT EVERYONE HOPES WON'T TOPPLE OVER AND FALL ON THEM WHEN THE BIG ONE HITS..



Jason McCrea
CITY OF LOS ANGELES
August 11, 2020 – Page 22

SHAME. SHAME. SHAME.

Response to Comment No. 11-1

This letter expresses the commenter's opinion, but does not raise any CEQA issues. It is nevertheless noted for the record and will be forwarded to the decision makers for their review and consideration.

Attachment A

Vibration Worksheet



Project: Hollywood and Wilcox Project EIR

Construction Vibration Impacts

Reference Levels at 25 feet are based on FTA, 2006 (Transit Noise and Vibration Impact Assessment)

Calculations using FTA procedure with n= 1.5 (for receptors 25 feet or greater)

n= 1.1 (for receptors less than 25 feet, per Caltrans procedure)

ON-SITE CONSTRUCTION ACTIVITIES

Table 1: Construction Equipment Vibration Levels (PPV) - Building Damages

Equipment	Reference Vibration Levels at 25 ft., PPV	Estimated Vibration Levels at nearest off-site building structures (distance in feet), PPV					
		US Post Office Building 90	YMCA Building 580	Security Trust & Saving Building 300			
Large Bulldozer	0.089	0.013	0.001	0.002			
Caisson Drilling	0.089	0.013	0.001	0.002			
Loaded Trucks	0.076	0.011	0.001	0.002			
Jackhammer	0.035	0.005	0.0003	0.001			
Small bulldozer	0.003	0.0004	0.0000	0.0001			
Significance Threshold, PPV		0.12	0.12	0.12			