

**Date** : 4/13/2020 3:50:51 PM  
**From** : "Hollywood Heritage"  
**To** : "jason.mccrea@lacity.org"  
**Subject** : DEIR comments Hollywood/ Wilcox  
**Attachment** : HHI DEIR Resp Hollywood and Wilcox.pdf;

Dear Mr. McCrea,

Please find Hollywood Heritage's comments in response to the Hollywood and Wilcox Project DEIR (ENV-2016-3177-EIR). If you have any questions do not hesitate to ask.

Best,

Lindsay Mulcahy  
Preservation Associate  
Hollywood Heritage, Inc.



**HOLLYWOOD HERITAGE, INC.**  
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Jason.mccrea@lacity.org

April 13, 2020

**Re: "Hollywood and Wilcox"**  
**City Case No. ENV-2016-3177 -EIR**  
**Addresses: 6430 -6440 Hollywood Boulevard and 1624-1648 N. Wilcox Ave**

Dear Mr. McCrea:

Hollywood Heritage has a keen interest in the preservation of our City's important architectural history and is responding to your Draft EIR with detailed comments. Our central concern is with the long-term preservation of Hollywood Boulevard's National Register Commercial and Entertainment Historic District, and the 4 specific effects the proposed project has on it:

1. **Attie Building restoration** (6436-40 Hollywood Bl. and 1646-48 Wilcox): While the DEIR provides a well-researched historical background, the resulting design proposal for the storefronts is insufficiently researched and inappropriate, but correctable.  
*Specific actions to ensure appropriate follow-through must be added to the project Conditions. See Attachment #1*
2. **National Register District building demolition/new building** (6430- 6434 Hollywood) (a non-contributor) without the requisite Historic Assessment. The DEIR conclusions that non-contributors by definition have no significance comes from a misunderstanding of District composition. Replacement by a new building which does not comply with the Secretary of the Interior Standards, Preservation Brief #14, or the

Hollywood Boulevard Urban Design Plan and other guidelines, is a significant adverse effect unless corrected.

*Correction of the design is necessary to avoid significant adverse effect; specific actions to ensure appropriate follow-through must be added to the project Conditions. See Attachment #2*

3. **Incompatible new project construction:** with significant adverse effects within the area of the Hollywood Boulevard Urban Design District and adjacent to the National Register District --which does not conform with design requirements or with zoning.

- a. **Incompatible and Oversize:** The project at over twice the allowed size looms over the National Register Historic District, with incompatible materials, 3 levels of above grade parking, with incompatible height--having adverse effects on that District. The proposed density exceeds that allowed anywhere in the Community Plan; does not meet Redevelopment Plan requirements for excess density; does not “pass the test” required in removing current zoning “D” conditions.

*The project design must be corrected to avoid significant adverse effect. See Attachment #3*

- b. **Direct effect on Mark Twain Hotel:** The insensitive design of the proposed above- grade parking and the demolition of the current buildings north of 1622 Wilcox can physically and economically affect the Mark Twain Hotel, identified in 2019 and shown as historically significant in the 2020 Historic Resources Survey on -line in the City Planning Department’s website.

*FEIR must recognize Mark Twain Hotel as an historically significant structure and eliminate adverse impacts. See Attachment #3*

4. **Avoiding genuine affordable housing:** By asking for allowance to build 2.5 x the floor area permitted by right and offering 10% “workforce housing”, the developer evades the normal, monitorable requirements for “affordable” housing when using incentives in SB 1818, TOC, or SB 330 or other laws. Hollywood has a glut of luxury housing resulting from a mountain of similar past discretionary actions. Hollywood Heritage customarily avoids raising such issues, but the data has piled up so it can’t be ignored. A false “conflict” of preservation with affordable housing is leveled against preservation. But it is the outsized project that puts Hollywood Heritage on the defensive, when yet again no affordable housing results from the give-away of units. The problems and conflicts are being created for preservation. A code-compliant project would not have these problems.

*FEIR must clarify specific income level served by “workforce housing”—approximately \$90,000 per year or \$2,250/month rent—and what agency will be charged with monitoring performance by the developer.*

*See Attachment #4*

**Positive design approaches:** Hollywood Heritage recognizes the attempt to ameliorate the project’s impact:

- Recounting of the Attie Building’s history and significance with a genuine effort to guide restoration in a Standards-compliant way (reflected on page IV.B-34), is well done. There are detailed issues and a need for a commitment to the timing.
- Keeping the proposed new building within the National Register District to the allowed height of 45’ in accordance with the Sec 7.3.A.1 of Hollywood Boulevard Urban Design Plan is good. Again there are detailed issues which can optimize the solution.
- Designing a new residential building to partially mitigate its overheight effect, by stepping back the bulk in accordance with Sec 7.4.B.2 of the Hollywood Boulevard Urban Design Plan is good. But the overall result still has a long way to go.

**Significant omissions from DEIR:** Hollywood Heritage is highly concerned that this DEIR is analyzing and illustrating a specific project, but not honestly and forthrightly revealing critical information:

- Must enforce Environmental Leadership, not let it drop: The project was granted State incentives based on a promise to achieve the LEED Gold building rating, prevailing wages, a 15% improvement in transportation efficiency, etc. The developer gained relief in Sacto from environmental law challenges on November 8, 2019. BUT the DEIR on page 16 erroneously says the project “*would apply* for LEED Gold certification”. The “sustainability features” touted in the DEIR are simply the existing mandatory minimums under State building codes. They cannot be presented as any example of compliance or earning the “Leadership” benefits. The Project Description cites that a binding written agreement must already exist implementing the Leadership mandates. The omission for the DEIR is conspicuous, and all the conditions must be included in the FEIR.

*LEED Gold is a requirement of the Project and the other “leadership” promises must become requirements of the project.*

- Must recognize and follow Hollywood Boulevard Urban Design Plan: On November 11, 2019 the Hollywood Redevelopment Plan land use responsibilities transferred to the City of Los Angeles. On November 7, at a hearing to approve the long-delayed Hollywood Boulevard Urban Design Plan in time for that transfer, Project representatives lobbied successfully to stop the Community Redevelopment Agency from approving the important plan. This Urban Design Plan was a 3<sup>rd</sup> updated version prepared by CRA to clarify the design standards and review process for the area surrounding and on Hollywood Boulevard—a requirement written into the Redevelopment Plan in 1986. For over 30 years “All new development in the District shall meet the design guidelines to ensure that the objectives of the District are achieved.” Whether or not the guidelines were ever formally adopted by CRA, they reviewed projects. The City as successor agency is required to review as well.

*FEIR must include a comprehensive written review of proposed new construction in accordance with the Urban Design Plan—adopted or not. One option is to incorporate into Site Plan Review. The FEIR may choose to use the 1993 version- as CRA had agreed to before the transfer- or review according to all versions.*

- Must acknowledge the City’s Conservation Element: An unacceptable omission from the DEIR Land Use section is that fact that the City of Los Angeles General Plan Conservation Element broadly recognizes preservation of historic buildings as a General Plan priority. The DEIR implies the Element is limited to landscape and open space features, and thus, as implied on page IV.F-23-24 has no conflict with the “applicable goals, objectives, and policies set forth in the Conservation Element”. For CEQA, the Conservation Element casts a broad net for eligibility, including buildings identified by the Community Redevelopment Agency, etc.

*The omission must be corrected overtly in the FEIR*

- Must show all the CRA-related land use entitlement processes, created as “Multiple Approvals Procedural Revisions Ordinance” No. 182,106 (Multiple Approvals Ordinance) which amends Chapter 1 of the Los Angeles Municipal Code (the “Code”). The DEIR fails to address conformance with the Redevelopment Plan—falling back of “goals and objectives” of redevelopment rather than the actual plan contents of the Plan.

*The omission must be corrected overtly in the FEIR*

- Must process the removal of the “D” conditions as a Variance, rather than a Zone Change.

## **NEEDED CEQA ACTIONS**

**Environmentally Superior Project:** Hollywood Heritage agrees that the environmentally superior Project for this site is Alternate #5. The site development would be limited to what is allowed by zoning, which would enable to project to be significantly less adverse to historic resources. As the DEIR showed no evidence of conforming to commitments made on environmental leadership, and as “workforce housing” still means \$2,500 - \$3,000 month rent/unit, (and no commitment to how many units) the environmental superiority is of the code-compliant project is evident. *Details provided in Attachment #5.*



**Needed corrections to facts and analysis:** Throughout this letter Hollywood Heritage has pointed out factual errors and analytical conclusions which must be corrected in the FEIR. The preferred method of correction is changing the project so that the issues do not occur.

### **Needed Mitigation Measures:**

- **MM2- (Cultural Resources): Attie Building Rehabilitation Plan:** The Attie Building will be submitted for Cultural Heritage Monument consideration, with an attached Preservation Plan as a part of the nomination showing a Standards-compliant approach to the restoration, including the storefront reconstruction. The nomination must be accepted by the Cultural Heritage Commission for consideration prior to the start of any demolition associated with the project and any alterations on the Attie Building.
- **MM3: (Cultural Resources): Attie Building Preservation Monitoring:** Any alterations or restoration/rehabilitation at the Attie Building shall be directed by and monitored in accordance with a Preservation Plan. Submittal to City of Los Angeles, Office of Historic Resources required for review of findings and plans for restoration. Submittal process and review should be integrated into overall construction schedule.
- **MM4-(Cultural Resources) Infill Building in Historic District:** The new Hollywood Boulevard building will be redesigned to make a building which contributes to the District.
- **MM5-(Cultural Resources) Mark Twain Hotel mitigations:** The project impact to the Hotel through the excavation and vibration associated with new construction has been addressed. But mitigations to lessen impacts on the operation of the neighboring hotel during construction, and a re-design of the project to eliminate the un-relieved huge solid wall outside the Mark Twain windows, must be required.
- **MM (Land Use): Floor Area Averaging Removes all Developable FAR from 2 Hollywood Boulevard Lots:** The use of the lot area of the Attie Building and a neighboring building within the Historic District to contribute to the project's allowable FAR/development means that the proposed Vesting CUP to allow Floor Area averaging in a Unified Development means that a deed restriction must be put on those parcels prohibiting any future redevelopment, and the D conditions be re-written to reflect the absence of developable floor area (other than historic repair of current square footage)
- **MM (Transportation):** The project shall achieve 15% Leadership goal as agreed.
- **MM (Land Use):** Compliance with Hollywood Boulevard Urban Design Plan required
- **MM- Prevailing wages -** this is a requirement of the Leadership agreements executed by the Developer with the State. This requirement must be made a permanent requirement for the Project in the event the Developer sells the project—or the EIR process will need to be re-instated
- **MM – LEED Gold –** see above re Leadership agreements.

Given the severity of the problems with the new building design it appears that a façade redesign, a significant size reduction, and especially a redesign of the south-facing portion must be done prior to sending out the FEIR.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Richard Adkins".

Richard Adkins  
President, Hollywood Heritage Inc.

*Attachment #1*  
**DETAILED DISCUSSIONS**

**Attie Building Restoration-  
Ensuring no Adverse Impact**

**History and Significance:** The Attie Building, at 6436 – 6440 Hollywood Boulevard, has long been acknowledged as historically significant. Appendix D cites the listing as a ID, being a contributing structure to the Hollywood Boulevard Commercial and Entertainment Historic District listed on the National Register of Historic Places and the California Register.

The Attie Building’s Art Deco style, designed by Henry Minton (a prolific architect for Bank of Italy/Bank of America buildings), was built in 1931. Its 9,000 sf is mostly in a 2 story portion at the southwest corner of Hollywood and Wilcox, but it also has a one story wing south along Wilcox Avenue. Entrance to the 2<sup>nd</sup> story is and was from Wilcox.

The prime period of the District ends in 1939. The District is a rare District listed at the highest level of significance in the nation. The Attie Building restoration, therefore, should focus on the building appearance up to 1939. Appendix D provides a well-researched and detailed history of the building’s construction and architect places the building in the context of the architect’s work and identifies visible extant important features.

**HCM:** The historic consultant concludes that the Attie Building is eligible of as a Cultural Heritage Monument, and we agree.

**Follow-up action on Attie Building:** The DEIR Appendix D concludes “no adverse effect” of the Attie Building restoration, based on the threshold that “alteration of a significant resource that does not conform to the Secretary of the Interior Standards will result in a significant impact.” (page 30) Section IV Cultural Resources of the DEIR evaluates the proposed “restoration” based on applicable items from the Secretary of Interior Standards. The analysis on page IV.B-32—including recasting of missing terra cotta spandrels, storefront reconstruction, etc-- is good.

Follow-up using the Secretary of the Interior Guidelines for Rehabilitating Historic Buildings normally includes *identifying, retaining and preserving* character-defining features. A detailed approach is as follows:

**Identifying Character-defining features:** The DEIR does not provide a comprehensive investigation of all areas and surfaces of the identified historic resource. Visual examination and The Non Destructive Evaluation Façade Investigation Report and Addendum do not provide conclusive determination of historic construction or materials that may be extant. Without selective removal of non-historic materials obscuring interior walls and exterior façades a complete inventory of remaining historic construction and materials is not possible, and thus the proposed design’s accuracy cannot be concluded.



2. Retaining and preserving character-defining features: A commitment to the restoration/rehabilitation of this building should be ingrained in the project in order to support any conclusion that the project before us does not adversely affect the Attie Building. The standard requirement is a Rehabilitation Plan, which provides guidance required to preserve character-defining features and the platform for reconstruction of missing components based on physical evidence. The Rehabilitation Plan includes the following components
  - List of qualified preservation architect, architectural conservator and specialty contractor consultants to perform further documentation,
  - Condition Assessment Report (material condition assessments, analysis and removal of non-historic materials potentially obscuring historic building fabric). Documents findings--evaluation of historic materials to be performed by architectural conservation professional, (Architectural Conservator) member of American Institute for Conservation, PA or Fellow. Report includes written assessment, photographic documentation, testing and analytical report documentation that may be required to characterize historic finishes.
  - Protection Plan outlining methods and means for protection of historic structure before and during construction. Protection Plan to be integrated with overall construction schedule and should incorporate anticipated changes of protection materials and locations depending on construction activity, as well as monitoring needed to protect from over-demolition.
  - Removal Plan outlining methods and means for removal of interior and exterior non historic materials, documentation of findings and timetable for work to be performed including integration with construction schedule. This work will be required to implement rehabilitation/restoration measures.
  - Treatment Plan prepared by Architectural Conservator and Preservation Architect based on findings documented in Condition Assessment Report. The Treatment Plan outlines methods and means for cleaning, repairs, reproduction of losses (where necessary and approved) of historic fabric. Integration of the Treatment Plan integrated into overall construction schedule.
3. Restoration Planned- correct errors in DEIR: The DEIR on Page 11-10 mistakenly says the Attie building restoration will comply with the building code for new construction under Sec 3404A of the Building Code. That is the code for hospitals. Section 34 has been moved to the California Existing Buildings Code, and the code says the opposite: the Attie Building is entitled to existing non-conforming rights, and additionally is eligible for use of the permissive sections of the State Historic Building Code.

**Special attention to Attie Building storefront investigation and design:**

1. Storefront on Wilcox: Page IV.B-32 of the DEIR states that no physical evidence of the storefronts exists, and no physical evidence of earlier storefronts was revealed. But the exploration—as noted above—was incomplete. Photographic evidence from 1934

show clearly the needed evidence on Wilcox at the 1 story-portion of the Attie Building: a sign band, awnings (thus confirming an awning pocket), and by implication storefront windows for stores. The same is evident on Wilcox at its corner with Hollywood.

2. Storefront column spacing in 1939: Hollywood Heritage believes the storefront design proposed by the Project is not accurate. Up to 1939, it appears the storefront rhythm existed in keeping with the 2<sup>nd</sup> floor terra cotta pilasters on Hollywood Boulevard. Page IV.B-32 of the DEIR states that no physical evidence of the storefronts exists. However, in the report itself photos of the store interiors showing that the column lines on the interior appear to align with the 2<sup>nd</sup> story terra cotta pilasters on the building front.
3. Better storefront restoration: This suggests that the Attie Building street level design matched every other terra cotta building of its time period—with columns roughly 16' on center at the front of the building, likely clad in terra cotta, or located immediately behind the glass. Photo evidence from 1933, 1934 and 1938 confirm that when the single tenant building sign band was divided into 2 tenants, it aligned with the 2<sup>nd</sup> floor terra cotta pilaster. Good assumption is that through 1939 the column lines came to the ground. Later post 1940's storefronts such as Graysons and Florsheim did not honor that line.

**Suriya mural having historic significance and follow-up:**

1. You Are The Star by Thomas Suriya, 1925. The DEIR provides adequate documentation of the mural identifying the artist and past restoration efforts. While reporting that the mural is identified by the *Mural Conservancy of Los Angeles*, it does not clarify whether or not the mural is registered with the City of Los Angeles Department of Cultural Affairs (CAD) and thus falls under the stewardship of the Department of Cultural Affairs which oversees mural conservation efforts. *The FEIR must clarify this stewardship.*
2. Follow-up on Mural: A comprehensive mural Condition Assessment and Treatment Plan following the guidelines and standards provided by CAD is missing. Condition Assessment will provide a detailed description of condition issues and recommended mitigation measures to be detailed in a comprehensive Treatment and Protection Plans. The Treatment Plan and Protection Plans should be integrated into the larger construction plan. Conservation/restoration efforts should be performed by a mural/paintings conservator with membership in the American Institute for Conservation, PA or Fellow.

*Attachment #2*  
**DETAILED DISCUSSIONS**

**Impact of Demolition and Infill Replacement Building  
(6430-6434 Hollywood)**

The DEIR concludes that the demolition of 6430-34 Hollywood Boulevard and the new construction replacing it have no significant adverse effect. *Hollywood Heritage* sees “follow-on” work needed in order to finalize that claim.

**DEIR approach:** CEQA says: “A project with an effect that *may* cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.” DEIR cites the following sources: recently re-issued State CEQA guidelines, as well as the CEQA statute itself, and the City of Los Angeles 2006 LA CEQA Thresholds Guide as sources to interpret what the law means.

Each of these documents focuses on, or boils down to 2 questions relative to the demolition and new construction of the “non-contributing” building in the National Register District at 6430-6434 Hollywood Blvd.:

- Is a significant resource being demolished, relocated, or altered? AND/OR
- Is there construction that reduces the integrity of important resources on the site or in the vicinity?

**Cited guidelines and thresholds don’t address this Project:** These guidelines and thresholds never overtly address the situation here: demolition of a non-contributing building (6430–34 Hollywood Blvd) within this National Register District, and the effect of a new building on that District. The guidelines and thresholds appear to address only material (“physical”) effects when a project involves individual historic buildings, rather than dealing with new infill or neighboring buildings and their effects on historic districts.

**1. Direct adverse effects on Attie Building (on project site):**

- There is an adverse effect omitted from the DEIR-- the effect of blocking windows on the east side of the second floor of the Attie Building. Whether this is significant should be addressed in the FEIR.
- The DEIR does look direct impacts such as that of shoring, drilling and vibration. Page 22 of DEIR states that mitigation measure NOI-MM-2 limits the vibration levels in regards to the Attie, 6430 Hollywood, and Mark Twain Hotel (.12 PPV for Attie, .20 PPV for 6430 Hollywood, .3 PPV for Mark Twain).

**2. Direct adverse effect of demolition of 6430-34 Hollywood Boulevard:**

- Potential significance: The DEIR in Appendix D provides a full history of the buildings, and a description of its many remodellings. It is likely that the conclusion of “not significant” is correct. However, the building was designed by the same Architect for the same client as the Attie Building, at the same time.

The automatic conclusion that non-contributors are not significant is a misunderstanding of historic districts. The automatic conclusion that demolition is not an adverse effect hasn't been conclusively made.

- **Historic Assessment needed:** This building from the Prime Period of the historic district must be assessed for its potential to be treated as a contributing historic resource. It was included within the historic district boundaries for good reason. Without assessing what physically remains of the building, finding historic and other documentation, and without clearly recognizing the urban pattern--how its size, overall structure, etc are a contribution to the District, the EIR conclusion of no effect does not have evidentiary support. The juxtaposition of smaller buildings with their larger neighbors at intersections is a character-defining feature of the district as a whole, particularly in the "core" section in which this project is located.
- **Changing understanding of non-contributors:** In 1985, only buildings built before 1935 which maintained a high degree of architectural integrity could be considered by the Keeper of the Register as contributors to Hollywood Boulevard's historic district. Guidance on evaluating contributing and non-contributing structures has changed over the years:
  - addition of "aspects of integrity", "alterations which have assumed significance over time", and "cultural associations" are being more thoroughly explored.
  - massing and construction of these buildings continues to provide information about the retail structure of the District as a whole, and if a formal amendment to the district nomination were to occur, many of these smaller altered structures would be considered contributors.
  - it is unwise to demolish any noncontributor built during the period of significance as the full impact on the district and its history and methods of construction are not entirely known.
  - This is the oldest section of the Boulevard, and the one whose low rise structures show the roots of the business district's development. While not architecturally interesting, these smaller examples speak to the social and cultural significance of the "Main Street."

The proposed two story replacement will alter this pattern in a pivotal location to the understanding of the District. Further, the connection of this structure to a larger one outside the District does not reflect the system of alleys and other land use patterns of Hollywood.

3. **Adverse effect of new infill construction on District:** HHI agrees with Appendix D that the Secretary of the Interior Standards underlie any analysis of the effect of the proposed Hollywood/Wilcox construction on the Hollywood Boulevard Historic District. However we disagree with the argument in Appendix D that only a design which renders an eligible historic resource ineligible can be the cause of a significant adverse effect under CEQA. This clearly is the wrong threshold for the situation here-- saying an entire mile long historic District must lose its eligibility due to this one project or new building!

- HHI believes the new building does reduce the integrity of the District. With a re-design of the building a District-compatible building is possible.
- The new building at 6430-34 Hollywood is proposed as infill in the Hollywood Boulevard Historic District, and must comply with Standards # 9 and 10, which are more deeply explored in the National Park Service Preservation Brief #14.
- In the case of a new infill building in the District, discussion of “materially impaired” should look at “those physical characteristics of an historical resources *and districts* (inserted by this writer) that justified “its inclusion in, or eligibility for, inclusion in the California Register” and query whether the new infill building—if it had been present at the time of the district boundaries—would have qualified as a district contributor at that time.
- The DEIR failed to provide a clear architectural description of the materials, scale, and styles of the “resource”—in this case the District. Vague statements about “heights vary” are lazy and misleading. This District has distinct urban patterning, captured in the nomination – its low rise buildings form consistent building line storefronts, providing a pedestrian-friendly shopping street ambiance, protected by awnings; the tall “height limit” bank and office buildings generally mark main north/south streets.
- Preservation Brief #14 states that the building height is the most important aspect of compatibility. In this case the choice made for height is compatible enough if the infill building has been justified.
- The design error in the proposed new infill building is the expression of the building as 2 story attention-getting, bright, building-high frames, infilled with curtain-wall like glazing. The effect is Rodeo Drive in 2000. The District clearly has side-walk level storefront usually on a bulkhead, and 2<sup>nd</sup> floor punched openings, clearly distinguished. The District has tangible, stone-like (“lithic”) materials. The District stylistically has a predominance of certain styles in the low rise sections.

**1993 UDP:** The City of Los Angeles is now responsible for reviewing infill buildings in this historic district, pursuant to the transfer of responsibilities from CRA. The intent of having a published Urban Design Plan was to take away any inkling of arbitrariness in design review, giving clear cut standards for new infill buildings to follow. This Projects proponents fought the adoption of a less stringent Urban Design Plan in 2019, so for the moment the 1993 Plan prepared by CRA and reviewed by its Board must be used in order to assess conformity with the Redevelopment Plan.

The 1993 Urban Design Plan reflected the actual urban patterning of the Boulevard. It locates the Attie Building and the infill building in the “Main Street” and “Boulevard Mixed Use” portion of the Plan. When written, this Plan jived with the zoning which remains in place today.

Feature	1993 Design Guidelines	Proposed Design	Complies?

Height		Approx 45'	<b>Yes</b>
Material	Stone, terra cotta glazed to resemble stone, brick, cementitious materials (Sec. 7.5.A)	Doesn't say? Likely cementitious materials	<b>Yes</b>
Color	Light color palette - earth tones, creamy pastels, highlighted by brighter and darker accent colors (Sec. 7.5.A)	White, no accent colors	<b>No</b>
Opacity	"between heights of 3 and 12 feet, storefront areas should be a minimum of 60% clear glass. storefronts should incorporate transoms of clear glass and/or detailed fascias" Sec 7.4.A.6 (pg. 7-21)	Over 60% clear glass	<b>Yes-</b>
	Upper floors		
Glazing	Use of clear glass is strongly encouraged but glazed areas should be differentiated in color from building's surface materials (7.5.B)	No differentiation	<b>No</b>
Facade Depth	Boulevard buildings are typically articulated by windows which are punched in solid masonry or masonry-like surfaces while other elements, such as sills or ornaments, create contrasting areas of light and shadow" Sec 7.4.A.3 (pg. 7-16)	Not punched windows	<b>No</b>
Storefront	"overall proportion of a storefronts should be approximately square and should have a maximum ratio of 1.5 feet of height for each foot of length"	??	<b>No</b>
	"the design of recessed entries to storefronts... is strongly encourages with new infill construction" (7.4.A.6 (pg. 7-16)	Not recessed	<b>No</b>

*Attachment #3*  
**DETAILED DISCUSSIONS**

**Impact of New Construction (1624-44 Wilcox) on Historic District  
And Mark Twain Hotel**

**Impact of New Construction on an Historic District:**

On page 42 of the Executive Summary, the DEIR poses that the new construction may have indirect impacts on the Hollywood Boulevard historic district as a whole.

- Is there construction that reduces the integrity of important resources on the site or in the vicinity?

**CEQA threshold:** Again Hollywood Heritage disagrees with the argument in Appendix D that only a design which renders an eligible historic resource ineligible can be the cause of a significant adverse effect under CEQA. This clearly is the wrong threshold for the situation here-- saying an entire mile long District must lose its eligibility due to this one project or new building!

Help comes in the form of Federal guidelines, implemented by the State of California. The vicinity to be evaluated is defined in 36 CFR § 800.16 as the: “geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking”

Again, as in the discussion of the infill building in the District, the guidance comes from the Secretary of the Interior Standards, especially Standard 39, and the discussions in Preservation Brief # 14. The predominant effect which can be significant and adverse is height.

There are generally recognized principles for threshold effect on historic districts:

- Cutting a district in half (visually or physically) so it loses continuity as a District;
- Overshadowing or lopsiding a District with new construction so its principal formal structure is compromised (such as overshadowing or removing a church on a New England town square);
- Creating such an offence or a distraction-- such as with billboards, wild colors, large amounts of glass, above grade parking garages, unadorned walls, etc-- that the continuity and features of a District are obscured.

This project crosses these usual thresholds for significant adverse effect. As in the analysis of the new infill building, the effect of on the District was not analyzed in the DEIR from a position of specificity about the District’s architectural qualities. *The FEIR must include and urban design*

*description of the urban patterning and qualities of the District, and evaluation of the current design— 300% height, attention-getting, bold colors, random frenetic pattern, unrelenting bulk in 2 directions, non-natural color, etc. Either the design is significantly corrected, or the project has a significant adverse effect.*

**1993 UDP:** Again, as discussed in the analysis of the infill building, the guidance provided by the 1993 Urban Design Plan illustrates how the proposed building design is a significant adverse effect on the Boulevard Historic District.

The 1993 Urban Design Plan reflected the actual urban patterning of the Boulevard. It locates the Attie Building and the infill building in the “Boulevard South” and “Residential Mixed Use” portion of the Plan.

<b>Feature</b>	<b>1993 Design Guidelines</b>	<b>Proposed Design</b>	<b>Complies?</b>
<b>Density</b>	2:1 or 118,780 sf	278,692 sf	<b>No</b>
<b>Height</b>	75'	160'	<b>No</b>
<b>Material</b>	Stone, terra cotta glazed to resemble stone, brick, cementitious materials (Sec. 7.5.A)	Consists of a fiber cement “outer skin” wall and an inner skin that reveals the buildings’ fenestrations (Appendix D, site plan review supplemental, pg. 15)	<b>No</b>
<b>Color</b>	Light color palette - earth tones, creamy pastels, highlighted by brighter and darker accent colors (Sec. 7.5.A)	White walls with “prominent bands of color” in yellow ,red, and orange and metallic accents (Appendix D, site plan review supplemental, pg. 34)	<b>No</b>
<b>Modulation</b>	“To maintain the small scale built form pattern which evolved based upon the original parcelization, street facades should not exceed 100 ft in length unless separate by a 10 ft deep by 20 ft court or setback at each inhabitable level” (Sec 7.4.B.1)	Facade is one monolithic block for over 200’-- which does not reflect the two underlying lots it occupies or meet guidelines	<b>No</b>
<b>Facade depth</b>	“Each wall surface shall incorporate facade depth through the use of individual windows set into the walls surface, facade surface breaks, shadow lines, articulation of edges reveals, change in material and ornamentation” (Sec 7.4.B.3)	Windows treated as planes or panels, not as individual windows set into walls. No articulation of edges.	<b>No</b>
<b>Balconies</b>	“should be integral to a building’s form and mass and should be a minor element in the definition of a building’s character		<b>No</b>



### **Impact of New Building on Mark Twain Hotel:**

The Mark Twain Hotel, at 1622 Wilcox Ave, is a 1921 Spanish Revival with a rare Mission motif, located immediately south of the Project .

The structure was recently identified as a 3CS/5S3 in the CRA/Architectural Resources Group Hollywood Historic Resources Survey 2019. It is a significant property associated with the African American community in Los Angeles, being the last remaining hotel listed in the Green Book, an African American travel guide, between 1949 and 1961. This property was one of relatively few hotels where African American travelers were welcome prior to the Civil Rights movement.

Direct effects from construction vibration and excavation will be required to protect the physical building from adverse effect.

The design of a massively tall unbroken concrete or otherwise solid wall along the south project property line, plus the damage of the construction period, will be a severe adverse impact on this structure. The 1993 Urban Design Plan additionally requires that portions of parking structures visible from public sidewalks and streets shall comply with the built form policies, standards, and guidelines.



*Attachment #4*  
**DETAILED DISCUSSIONS**

**Land Use**

**Quantitative Background:** The project has assembled a site with 2 parcels fronting on Hollywood Boulevard (6340-44 and 6356-40 Hollywood Boulevard) and 4 additional parcels. Two of those parcels have existing buildings 1624 Wilcox and 1626-28 Wilcox.

1. Parcel Area: The area of the parcels calculates at 59,390 sf using City records. There appear to be 3 sources of errors or complications. The land area reported in the DEIR is higher. The Project appears to show construction on a 15' varying width easement along Wilcox which not "owned" by the developer. The Easement # 94-135253 must be explained. The Assessor and the City Public Works Department do not show this as a part of the property owned by the developer.
2. Allowable Density: The Land Use section of the DEIR states that the developer requests an FAR of 4.5:1. The current zoning allows 2:1.

The DEIR omits all the needed facts and figures to understand the project; the land parcel sizes; the proposed unit mix; the parking calculation, etc. The FEIR must accurately present the Project.

**The DEIR underplays the most important facts about entitlements :**

- that the current zoning of "2D" allows a 2:1 FAR—not the 4.5:1 proposed on the combined lot areas, or as erroneously stated on page 8 an "allowed" 6:1. To reach 4.5:1, the "D" condition must be removed -- by conformance with the CRA's Redevelopment Plan, Boulevard Urban Design Plan, and Transportation Plan. These are not addressed or evaluated in the DEIR. The developer may purchase and transfer development rights for the requested 2.5 X density.
- that the R5 density claimed for residential density in the Hollywood Community Plan literally does not exist. The Community Plan "High" density category is 60-80 DU/acre. The 1988 Community Plan allowed R5 uses on specific parcels- the City has been mistakenly interpreting this as R5 densities.
- Project density in this case exceed maximums under the Community Plan and Redevelopment Plan

	Area	Allowed Zone	Allowed Density per Zoning	Requested	Allowed /Requested Height UDP
6430 -4 Hwd Bl	6,513 sf	C4-2D-SN	2:1 = 13,026 sf	9,000 sf	45/
6436-40 Hwd Bl	6,487 sf	"	2:1 = 12,974 sf	12,974 sf	45/
1644 Wilcox	12,727 sf	C4-2D-SN			75/160
No address	4, 410 sf				"
1634 Wilcox	12,737 sf				"
1626 Wilcox	12,466 sf				"
1624 Wilcox	3,819 sf				45/160'
	<b>59,390 sf</b>		<b>118,780 sf</b>	278,692 sf	

	Area	Dwelling Units	DU/Acre Request	DU/Acre HCP	DU/Acre CRA
Residential	261,092 sf	260	260/1.363= 190	80 max	80 max 130 max*
Other	17,800 sf				
Retail	11,020 sf				
Office	3,580 sf				
Restaurant	3,200 sf				
	<b>278,692 sf</b>				

\* if compatible in character, scale, and architecture of the neighborhood (Sec 505.1 Redevelopment Plan)

**Zoning:**

- Inadequate discussion of clearing of D condition: As noted above, *the FEIR must accurately state the findings that City Planning and the Redevelopment Agency must make in order to clear “D” condition.*

**“Workforce Housing” as a substitute for affordable housing:** The DEIR proposes setting aside “up to 10 percent” of units for workforce housing. The gesture of an undetermined percentage of workforce housing units does not contribute to City policies meant to ameliorate the impacts of the affordable housing crisis.

The Project Description fails to specify the income level at which these units will be offered, or even an exact percentage of units.

- The Los Angeles Housing and Community Investment Department (LAHCID), defines workforce housing as 150% Area Medium Income (AMI) (Appendix I.1).
- Given the extreme nature of the housing crisis and the disproportionate impact on low-income people, workforce housing has not been named a City priority.
- The 2018-2023 Assessment of Fair Housing 2018-2023 Fair Housing Goals and Priorities of City of Los Angeles & HACLA Los Angeles “encourage[ing] developers to produce affordable housing in new housing developments” as one of the City’s highest housing priorities (Goal I.1). It reports that with 713,710 households under the 80% AMI threshold, Los Angeles “has a significant shortage of housing affordable to lower-income households.”
- The 2014-2021 Regional Housing Needs Assessment (RHNA), another guiding document for housing development does not set allocations for workforce housing.
- A 2019 study from the Embarcadero Institute reveals that Los Angeles county met 23% of its low-income housing RHNA target for 2018, (approving only 10,826 of the expected 47,935 units), but surpassed their market rate housing target by 207%.

**Failure to meet Redevelopment Plan Goals**

The proposed project appears to exceed an FAR than 4.5:1 as stated, but the true question is why—given current zoning, is a discussion of 4.5:1 pertinent? The 4.5:1 is NOT an entitlement.

The DEIR on page 86 claims conformance with Redevelopment Plan goals in Section 300. That Section of the Redevelopment Plan did not transfer to the City of Los Angeles.

The FEIR must analyze the Redevelopment Plan Land Use Section, and the compliance of this Project with the quantitative and procedural parts accepted by the City, rather than declare compliance with goals.

**Parking:** The Project is described as having 420 parking spaces. The unit breakdown does not appear to be included in the EIR, nor the parking calculation. Pg. 4 of the Transportation chapter says, because the project is in a transit priority zone "the Project's aesthetics and parking impacts shall not be considered significant impacts on the environment" pursuant to PRC Section 210999.

*The FEIR should show how parking is calculated, and how the Project is offering the 15% improvement, and ensure the spaces are “unbundled” per agreement.*

This table shows how parking calculations might have been reached, suggesting that parking is provided at normal rates. (The Redevelopment Area, which has always been transit rich, has always allowed a reduction in parking spaces. )

	Area	Dwelling Units	Parking/x	Est Redev	Est Standard
Residential	261,092 sf	260	Unclear unit mix – assume 1 BR-	325 spaces	390 spaces
Other	17,800 sf		1/500 sf	35.6 spaces	35.6 spaces
Retail	11,020 sf				
Office	3,580 sf				
Restaurant	3,200 sf				
	<b>278,692 sf</b>			<b>410.6 spaces</b>	<b>425.6 sp</b>

As the Project is being constructed on parking lots which have been used to support existing businesses in the Boulevard historic District, and as CRA studies have shown a shortfall of roughly 500 spaces in this mid- section of Hollywood Boulevard, Hollywood Heritage recommends that in order to deliver on public benefit the Project provide an equal number of parking spaces for the general public as are being removed from the surface lot.

*Attachment #4*  
**DETAILED DISCUSSIONS**

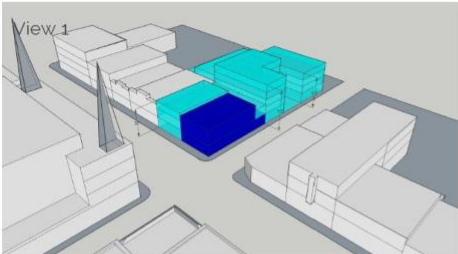
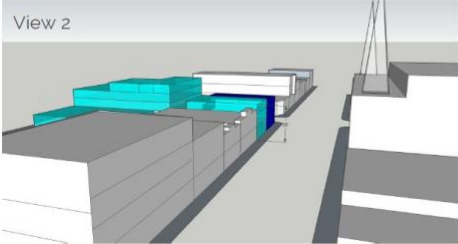
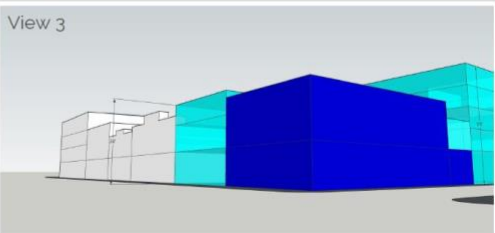
**Environmentally Superior Alternative**

**Alternative 2: Zoning Compliant Mixed-Use Alternative**

- Developed in accordance with existing C4-2D-SN zoning with FAR limitation of 2:0:1. This would develop 123,952 sqft of uses instead of 278,892.
- Would retain but not restore the Attie
- Uses would be 125 units (no workforce housing) and 14,600 sqft for retail and 3,200 for restaurant (less retail and no office, compared to proposed), 15,000 open space
- 222 parking spaces, .5 ground level and 2 above ground (no 10% reduction in parking compared to proposal)
- New buildings between 1-8 stories, max height 90 ft
- Would not seek certification under AB 900 Jobs and Econ improvement thru environmental leadership

**Alternative 5: Proposed Hollywood Community Plan Update Complaint Mixed-Use Alternative**

- Under the Proposed Hollywood Community Plan Update the project site would be designated a Regional Commercial Center with a zoning designation of C4-2D-CPIO with FAR limitation of 3:1 and max height of 75 ft
- Would retain but not restore the Attie
- 127,375 sqft of new use - 123 multi-family housing units (no workforce housing), 14,600 sqft for retail and 3,200 for restaurant, 14,375 open space
- New buildings between 1 and 7 stories, max height 75 ft
- 222 parking spaces, 1 subterranean level, .5 ground level and 1 above ground (no 10% reduction in parking compared to proposal)
- Would not seek certification under AB 900 Jobs and Econ improvement thru environmental leadership
- Does not say if they would keep 6434 Hollywood

HISTORIC RESOURCES	ZONING & USES	BUILT FORM	PUBLIC REALM
 <p>View 1</p>		<p><b>MASSING</b></p> <p>By-Right: <b>45 feet &amp; FAR 2:1</b></p> <p>GBA: <b>119,109 sq ft</b></p> <p>Maximum Height: <b>55 ft</b></p>	
 <p>View 2</p>		<p>Density Bonus with Affordable Housing</p> <p>Resulting FAR 2.7:1 (Including Density Bonus)</p> <p>Includes open space along Wilcox</p>	
		 <p>View 3</p>	