

Date : 6/26/2017 2:38:57 PM
From : "Hollywood Heritage"
To : "william.lamborn@lacity.org"
Cc : "Richard Adkins" , "John Girodo"
Subject : Response to NOP for Hollywood and Wilcox Project
Attachment : Hollywood Heritage LeFrak NOP Response--6.26.2017.pdf;

Good afternoon Mr. Lamborn,

Attached please find Hollywood Heritage's response to City Planning's NOP for the Hollywood and Wilcox Project. Please let us know if you have any questions or concerns.

Sincerely,

Richard Adkins
President, Hollywood Heritage, Inc.



HOLLYWOOD HERITAGE, INC.

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Hollywood, CA 90078

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June 26, 2017

William Lamborn, City Planning Associate
City of Los Angeles Department of City Planning
200 N Spring Street, Room 750
Los Angeles, CA 90012

**Re: Notice of Preparation of an Environmental Impact Report for Project
Hollywood and Wilcox (Case No. ENV-206-3177-EIR)**

Dear Mr. Lamborn:

Hollywood Heritage, an historic preservation organization with a robust and engaged membership, is sending this letter to respond to the Notice of Preparation (NOP) provided by Los Angeles Department of City Planning (City Planning) for **Environmental Impact Report # ENV-2016-3177-EIR, Planning Case # CPC-2016-3176-VZC-HD-CU-MCUP-SPR.**

This Case concerns changes to a Zoning/Height District, requested by the LeFrak Organization (LeFrak), to allow for a mixed-use development spanning **6430-6440 W Hollywood Boulevard** and **1624-1648 N Wilcox Avenue**. The LeFrak proposal calls for 278,892 square feet of new development, with 260 dwelling units, 17,800 square feet of commercial space, a maximum structure height of 160 feet, and a license to sell alcohol in three separate establishments. Such structure dimensions are not possible under the property's current C4-2D-SN designation, which permits a maximum Floor Area Ratio (FAR) of 2:1. Therefore, LeFrak is requesting to increase the permitted FAR to 4.5:1. The LeFrak proposal also includes rehabilitation of the historic Attie Building, which per project plans would be incorporated into the development.

Hollywood Heritage has a longstanding history of working with City agencies and developers to preserve the integrity of historic resources and neighborhoods in the Hollywood area. Prior to the release of City Planning's NOP, Hollywood Heritage met with the developer's project team for a brief preliminary review of the proposal; Hollywood Heritage additionally met with a subset of that project team to discuss rehabilitation of the Attie Building. After engaging in these discussions and reviewing the NOP provided by City Planning, Hollywood Heritage has

a number of concerns related to the LeFrak proposal. These concerns, outlined below, specifically relate to the proposal's impact on identified historic resources.

Concerns related to the LeFrak proposal's impact on historic resources

Hollywood Heritage's concerns related to historic preservation are twofold: (1) the proper rehabilitation of the Attie Building; and, even more vitally (2) the impact of new construction on the historic setting of the Hollywood Boulevard Historic District and other historic resources.

First, the Attie Building is a resource identified as contributing to the Hollywood Boulevard Historic District. As such, Hollywood Heritage fully expects that rehabilitation of the Attie Building will conform to the Secretary of the Interior Standards and that adequate research and qualified personnel will direct that rehabilitation. Unfortunately, the LeFrak proposal replaces a current non-contributing structure on Hollywood Boulevard to allow new construction to "wrap" the Attie Building. The proposal's development thereby intrudes into the Hollywood Boulevard Historic District and "walls off" the Attie Building from its historic neighbors. Furthermore, the non-contributing structure identified for demolition was built during the District's period of significance and should be analyzed for rehabilitation and retention. In light of these details, Hollywood Heritage believes the proposed development will have an adverse impact on the historic integrity of the Attie Building and its neighboring structure.

Nevertheless, Hollywood Heritage believes the adverse impacts of this proposal extend beyond the Attie Building and its immediate surroundings. In particular, the intended scale, height, and massing of the new project will negatively affect the Hollywood Boulevard Commercial and Entertainment District (HBCED) and its surroundings by disrupting the low-rise nature of the area's built environment. As a result, the project does not comply with the recommendations cited by the Secretary of the Interior Standard #9 for appropriate infill for a listed National Historic District.

In addition, Hollywood Heritage has critical concern that the LeFrak proposal will reduce the economic viability of historic business buildings within the HBCED by demolishing the surface parking lot that supports the Boulevard storefronts. Also, the Safran Associates new construction project opposite the LeFrak project will demolish the Department of Transportation (DOT) surface parking lot on the west side of Wilcox. The cumulative impact of these parking reductions on adjacent businesses is clear and severe. The LeFrak proposal, within its new construction component, should be required to reserve a determined and specific number of public parking spaces covenanted for use by the HBCED storefronts.

Future project considerations

In light of these concerns, Hollywood Heritage expects to see alternatives to the current LeFrak proposal. These alternatives should minimize the impact on historic resources by reducing the size, scale, and use design of the development to make it more compatible with the historic streetscapes of Hollywood Boulevard and Wilcox Avenue. Efforts to maximize the exposure of these thoroughfares' historic buildings is strongly preferred.

Hollywood Heritage further expects to see the LeFrak proposal analyzed in accordance with the new Preservation chapter of the Draft Community Plan, as well as potential overlays and

zoning in the Community Plan's Land Use section, which will preserve the historic nature of the Hollywood core. Hollywood Heritage's standardized directive to all developers is to adhere voluntarily to the Hollywood Urban Design Guidelines (un-adopted) in design of their new construction component.

Hollywood Heritage urges you to ensure that the above actions are taken during the EIR process. Doing so will ensure that Hollywood retains its character-defining features. Please let us know if you have any questions or require any additional information.

Sincerely,

A handwritten signature in cursive script that reads "Richard Adkins". The signature is written in black ink and is positioned above the typed name and title.

Richard Adkins
President, Hollywood Heritage, Inc.