Quetzalli Enrique <quetzalli.enrique@lacity.org>

Comments on the Hollywood Community Plan Update

Kateryna Bondarchuk <info@sg.actionnetwork.org> Wed, Dec 9, 2020 at 11:18 AM
Reply-To: KARPALOKATIA@gmail.com
To: hollywoodplan@lacity.org, linda.lou@lacity.org

Dear Ms. Lou,

The Hollywood Community Plan provides a great opportunity to make our community more equitable and just but the most recently proposed plan is a giveaway to luxury apartment and commercial developers. In parts of the plan area, the base FAR is over doubled to 4.5 FAR with no affordable housing requirements and only lackluster requirements (10% ELI) for projects that receive triple what is allowed currently. This will threaten existing housing and discourage the use of affordable housing incentives in favor of commercial and 100% market rate development. Please do not increase the Base FAR, but rather make sure any and all increases to building size are tied to affordability. Hollywood is already awash in commercial development, including thousands of new hotel rooms. We need more public oversight over commercial development, including a conditional use permit for hotels appealable to City Council and no new upzoning without affordable housing.

The Just Hollywood Coalition of faith, environmental, labor, community, and housing organizations has proposed changes to the Hollywood Plan to encourage affordable housing, protect RSO buildings, create new policies to promote local hiring, protect small business, incentivize the use of transit and encourage new, energy efficient buildings integrated into Hollywood's natural environment.

Please support the Just Hollywood Plan!

Kateryna Bondarchuk
KARPALOKATIA@GMAIL.COM
5118 1/2
Los Ángeles , California 90029

Comments on the Hollywood Community Plan Update

Quetzalli Enrique <quetzalli.enrique@lacity.org> Wed, Dec 9, 2020 at 1:56 PM
To: KARPALOKATIA@gmail.com
Cc: Hollywood Plan <hollywoodplan@lacity.org>, Linda Lou <linda.lou@lacity.org>

Hello Kateryna,

Thank you for your comments. Your email has been received and filed.

Best,
Quetzalli

Quetzalli Enrique
Preferred Pronouns: she, her, hers
Planning Assistant
Los Angeles City Planning
200 N. Spring St., Room 667
Los Angeles, CA 90012
T: (213) 978-1175 | Planning4LA.org
E-NEWS

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Comments on the Hollywood Community Plan Update

Quetzalli Enrique <quetzalli.enrique@lacity.org> Wed, Dec 9, 2020 at 1:56 PM
To: KARPALOKATIA@gmail.com
Cc: Hollywood Plan <hollywoodplan@lacity.org>, Linda Lou <linda.lou@lacity.org>

Hello Kateryna,

Thank you for your comments. Your email has been received and filed.

Best,
Quetzalli

Quetzalli Enrique
Preferred Pronouns: she, her, hers
Planning Assistant
Los Angeles City Planning
200 N. Spring St., Room 667
Los Angeles, CA 90012
T: (213) 978-1175 | Planning4LA.org
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On Wed, Dec 9, 2020 at 11:19 AM Kateryna Bondarchuk <info@sg.actionnetwork.org> wrote:

> Dear Ms. Lou,
>
> The Hollywood Community Plan provides a great opportunity to make our community more equitable and just but the most recently proposed plan is a giveaway to luxury apartment and commercial developers. In parts of the plan area, the base FAR is over doubled to 4.5 FAR with no affordable housing requirements and only lackluster requirements (10% ELI) for projects that receive triple what is allowed currently. This will threaten existing housing and discourage the use of affordable housing incentives in favor of commercial and 100% market rate development. Please do not increase the Base FAR, but rather make sure any and all increases to building size are tied to affordability. Hollywood is already awash in commercial development, including thousands of new hotel rooms. We need more public oversight over commercial development, including a conditional use permit for hotels appealable to City Council and no new upzoning without affordable housing.
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>
> Please support the Just Hollywood Plan!
>
> Kateryna Bondarchuk
> KARPALOKATIA@GMAIL.COM
> 5118 1/2
> Los Ángeles , California 90029

Comments on the Hollywood Community Plan Update

miranda cristofani <info@sg.actionnetwork.org>
Reply-To: mirandacristofani@gmail.com
To: hollywoodplan@lacity.org, linda.lou@lacity.org

Wed, Dec 9, 2020 at 11:09 AM

Dear Ms. Lou,

The Hollywood Community Plan provides a great opportunity to make our community more equitable and just but the most recently proposed plan is a giveaway to luxury apartment and commercial developers. In parts of the plan area, the base FAR is over doubled to 4.5 FAR with no affordable housing requirements and only lackluster requirements (10% ELI) for projects that receive triple what is allowed currently. This will threaten existing housing and discourage the use of affordable housing incentives in favor of commercial and 100% market rate development. Please do not increase the Base FAR, but rather make sure any and all increases to building size are tied to affordability. Hollywood is already awash in commercial development, including thousands of new hotel rooms. We need more public oversight over commercial development, including a conditional use permit for hotels appealable to City Council and no new upzoning without affordable housing.

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Please support the Just Hollywood Plan!

miranda cristofani
mirandacristofani@gmail.com
1809 N Easterly Terrace
los angeles, California 90026

Quetzalli Enrique <quetzalli.enrique@lacity.org>

Comments on the Hollywood Community Plan Update

Quetzalli Enrique <quetzalli.enrique@lacity.org> Wed, Dec 9, 2020 at 1:40 PM
To: mirandacristofani@gmail.com
Cc: Hollywood Plan <hollywoodplan@lacity.org>, Linda Lou <linda.lou@lacity.org>

Hello Miranda,

Thank you for your comments. Your email has been received and filed.

Best,
Quetzalli

Quetzalli Enrique
Preferred Pronouns: she, her, hers
Planning Assistant
Los Angeles City Planning
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Quetzalli Enrique <quetzalli.enrique@lacity.org>

Comments on the Hollywood Community Plan Update

Margareth Montes <info@sg.actionnetwork.org> Wed, Dec 9, 2020 at 11:03 AM
Reply-To: Mmontes@thepeopleconcern.org
To: hollywoodplan@lacity.org, linda.lou@lacity.org

Dear Ms. Lou,

The Hollywood Community Plan provides a great opportunity to make our community more equitable and just but the most recently proposed plan is a giveaway to luxury apartment and commercial developers. In parts of the plan area, the base FAR is over doubled to 4.5 FAR with no affordable housing requirements and only lackluster requirements (10% ELI) for projects that receive triple what is allowed currently. This will threaten existing housing and discourage the use of affordable housing incentives in favor of commercial and 100% market rate development. Please do not increase the Base FAR, but rather make sure any and all increases to building size are tied to affordability. Hollywood is already awash in commercial development, including thousands of new hotel rooms. We need more public oversight over commercial development, including a conditional use permit for hotels appealable to City Council and no new upzoning without affordable housing.

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Please support the Just Hollywood Plan!

Margareth Montes
Mmontes@thepeopleconcern.org
Hobart Blvd
Los Angeles , California 90027

Quetzalli Enrique <quetzalli.enrique@lacity.org>

Comments on the Hollywood Community Plan Update

Quetzalli Enrique <quetzalli.enrique@lacity.org> Wed, Dec 9, 2020 at 1:20 PM
To: Mmontes@thepeopleconcern.org
Cc: Hollywood Plan <hollywoodplan@lacity.org>, Linda Lou <linda.lou@lacity.org>

Hi Margareth,

Thank you for your comments. Your email has been received and filed.

Best,
Quetzalli

Quetzalli Enrique
Preferred Pronouns: she, her, hers
Planning Assistant
Los Angeles City Planning
200 N. Spring St., Room 667
Los Angeles, CA 90012
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Quetzalli Enrique <quetzalli.enrique@lacity.org>

RE: Hollywood Community Plan Update

2 messages

Gary Davidson <jd.gary@gmail.com> Wed, Dec 9, 2020 at 1:13 PM
To: quetzalli.enrique@lacity.org

Quetzalli Enrique:
I OPPOSE PORTIONS OF THE HOLLYWOOD COMMUNITY PLAN UPDATE. SPECIFICALLY, CHANGING ZONING FROM R1-1 TO R3-1XL IN THE BEACHWOOD CANYON HOLLYWOODLAND AREA.

I am a builder. I have designed several homes for the Beachwood Canyon Hollywoodland area. Changing the R1-1 zoning to R3-1XL essentially limits homes in this area to 2 living levels. All new hillside construction in Los Angeles has 3 living levels. 95% of the homes in the Hollywoodland area are 3 living levels. Two levels gives you this: One level with 2 bedrooms and a bath, and a second level with a living room, kitchen, and dining room, and a second bath. A third level must accommodate the 4 parking spaces now required. The new proposed zoning precludes that any new house built in the canyon will be economically feasible. One can only assume that was the intent all along?

Best,
Gary Davidson
310-395-2504
Jd.gary@gmail.com

Quetzalli Enrique <quetzalli.enrique@lacity.org> Wed, Dec 9, 2020 at 1:58 PM
To: Gary Davidson <jd.gary@gmail.com>
Cc: Hollywood Plan <hollywoodplan@lacity.org>

Hello Gary,

Thank you for your comment. Your email has been received and filed.

Best,
Quetzalli

LOS ANGELES CITY PLANNING

Quetzalli Enrique
Preferred Pronouns: she, her, hers
Planning Assistant
Los Angeles City Planning
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Los Angeles, CA 90012
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Quetzalli Enrique <quetzalli.enrique@lacity.org>

Comments on the Hollywood Community Plan Update

Margareth Diaz <info@sg.actionnetwork.org> Wed, Dec 9, 2020 at 11:04 AM
Reply-To: margarethp.montes@gmail.com
To: hollywoodplan@lacity.org, linda.lou@lacity.org

Dear Ms. Lou,

The Hollywood Community Plan provides a great opportunity to make our community more equitable and just but the most recently proposed plan is a giveaway to luxury apartment and commercial developers. In parts of the plan area, the base FAR is over doubled to 4.5 FAR with no affordable housing requirements and only lackluster requirements (10% ELI) for projects that receive triple what is allowed currently. This will threaten existing housing and discourage the use of affordable housing incentives in favor of commercial and 100% market rate development. Please do not increase the Base FAR, but rather make sure any and all increases to building size are tied to affordability. Hollywood is already awash in commercial development, including thousands of new hotel rooms. We need more public oversight over commercial development, including a conditional use permit for hotels appealable to City Council and no new upzoning without affordable housing.

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Please support the Just Hollywood Plan!

Margareth Diaz
margarethp.montes@gmail.com
1545 North Hobart Blvd.
Los Angeles, California 90027

Quetzalli Enrique <quetzalli.enrique@lacity.org>

Comments on the Hollywood Community Plan Update

Quetzalli Enrique <quetzalli.enrique@lacity.org> Wed, Dec 9, 2020 at 1:29 PM
To: margarethp.montes@gmail.com
Cc: Hollywood Plan <hollywoodplan@lacity.org>, Linda Lou <linda.lou@lacity.org>

Hi Margareth,

Thank you for your comments. Your email has been received and filed.

Best,
Quetzalli

Quetzalli Enrique
Preferred Pronouns: she, her, hers
Planning Assistant
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200 N. Spring St., Room 667
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Comments on the Hollywood Community Plan Update

Cara Ferraro <info@sg.actionnetwork.org>
Reply-To: ferrarocm@gmail.com
To: hollywoodplan@lacity.org, linda.lou@lacity.org

Wed, Dec 9, 2020 at 11:03 AM

Dear Ms. Lou,

The Hollywood Community Plan provides a great opportunity to make our community more equitable and just but the most recently proposed plan is a giveaway to luxury apartment and commercial developers. In parts of the plan area, the base FAR is over doubled to 4.5 FAR with no affordable housing requirements and only lackluster requirements (10% ELI) for projects that receive triple what is allowed currently. This will threaten existing housing and discourage the use of affordable housing incentives in favor of commercial and 100% market rate development. Please do not increase the Base FAR, but rather make sure any and all increases to building size are tied to affordability. Hollywood is already awash in commercial development, including thousands of new hotel rooms. We need more public oversight over commercial development, including a conditional use permit for hotels appealable to City Council and no new upzoning without affordable housing.

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Please support the Just Hollywood Plan!

Cara Ferraro
ferrarocm@gmail.com
3910 Inglewood Blvd
Los Angeles, California 90066

Quetzalli Enrique <quetzalli.enrique@lacity.org>

Comments on the Hollywood Community Plan Update

Quetzalli Enrique <quetzalli.enrique@lacity.org> Wed, Dec 9, 2020 at 1:27 PM
To: ferrarocm@gmail.com
Cc: Hollywood Plan <hollywoodplan@lacity.org>, Linda Lou <linda.lou@lacity.org>

Hi Cara,

Thank you for your comments. Your email has been received and filed.

Best,
Quetzallii

Quetzalli Enrique
Preferred Pronouns: she, her, hers
Planning Assistant
Los Angeles City Planning
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Los Angeles, CA 90012
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Sophia Kim <sophia.kim@lacity.org>

Hollywood Community Plan Update - Public Comment

Sophia Kim <sophia.kim@lacity.org> Thu, Dec 10, 2020 at 1:43 PM
To: Maddie Albanesius <maddiealbanesius@gmail.com>
Cc: Hollywood Community Plan <hollywoodplan@lacity.org>

Hello Maddie,

Thank you for your email. It has been received and filed.

On Wed, Dec 9, 2020 at 5:05 PM Maddie Albanesius <maddiealbanesius@gmail.com> wrote:

> Los Angeles & LA City Planning -
>
> I have lived in Hollywood since I moved to Los Angeles 6.5 years ago. I love this neighborhood because it is unpretentious, diverse, and unique. The biggest issue I've noticed since I moved here is the proliferation of "upscale" or "luxury" apartment buildings. They look, at most, half-occupied most of the time. This is such a huge issue with the ever increasing homeless population in Los Angeles. People need homes to build a more stable life. Please include the limit of luxury buildings in the new community plan. We don't need more but people do need affordable places to live in a very expensive city.
>
> I would also love to see more empty lots or condemned buildings (and their lots) turned into parks or community gardens. Los Angeles has one of the smallest amount of green spaces of any major city in the US. Please provide us more opportunities to "escape into nature," even in the middle of one of the busiest neighborhoods in one of the busiest cities in the world. The effect of nature, its sights and smells, is a great stress relief and increases the quality of life for most people.
>
> Thank you for taking the time to read my comment. Have a wonderful holiday!
>
> --
> **Maddie Albanesius**
> e: maddiealbanesius@gmail.com

--

LOS ANGELES CITY PLANNING

Sophia Kim
City Planning Associate
Los Angeles City Planning

200 N. Spring St.
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1208

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Sophia Kim <sophia.kim@lacity.org>

Comments on the Hollywood Community Plan Update

Sophia Kim <sophia.kim@lacity.org> Thu, Dec 10, 2020 at 1:51 PM
To: natashamissick@gmail.com
Cc: Hollywood Community Plan <hollywoodplan@lacity.org>, Linda Lou <linda.lou@lacity.org>

Hello Natasha,

Thank you for your email. It has been received and filed.

On Wed, Dec 9, 2020 at 6:21 PM Natasha Missick <info@sg.actionnetwork.org> wrote:

> Dear Ms. Lou,
>
> Dear Honorable Council Members,
> The Hollywood Community Plan provides a great opportunity to make our community more equitable and just but the most recently proposed plan is a giveaway to luxury apartment and commercial developers. In parts of the plan area, the base FAR is over doubled to 4.5 FAR with no affordable housing requirements and only lackluster requirements (10% ELI) for projects that receive triple what is allowed currently. This will threaten existing housing and discourage the use of affordable housing incentives in favor of commercial and 100% market rate development. Please do not increase the Base FAR, but rather make sure any and all increases to building size are tied to affordability. Hollywood is already awash in commercial development, including thousands of new hotel rooms. We need more public oversight over commercial development, including a conditional use permit for hotels appealable to City Council and no new upzoning without affordable housing.
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>
> Please support the Just Hollywood Plan!
>
> Natasha Missick
> natashamissick@gmail.com
> 1400 North Fairfax Ave, Apt 6, Apt 6
> Los Angeles, California 90046

--

LOS ANGELES
CITY PLANNING

Sophia Kim
City Planning Associate
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Quetzalli Enrique <quetzalli.enrique@lacity.org>

Hollywood Chamber of Commerce Response Letter: Hollywood Community Plan

2 messages

'Diana Yedoyan' via Hollywood Plan <hollywoodplan@lacity.org> Wed, Dec 9, 2020 at 2:47 PM
Reply-To: Diana Yedoyan <diana@hollywoodchamber.net>
To: Los Angeles City Planning <hollywoodplan@lacity.org>

Good morning,

Please see attached letter from the Hollywood Chamber of Commerce in response to today's public hearing and proposed Community Plan.

Best

Diana

–

Diana Yedoyan
Vice President, Public Policy and Economic Development
Hollywood Chamber of Commerce
6255 Sunset Blvd, Ste 150, Hollywood, Ca 90028

o: (323)468-1380 ext 140 | c: (818)497-5903

diana@hollywoodchamber.net
hollywoodchamber.net | walkoffame.com | Chamber events

Follow us: facebook / twitter / instagram

HCOC_Community Plan Response Letter.pdf
207K

Quetzalli Enrique <quetzalli.enrique@lacity.org> Wed, Dec 9, 2020 at 2:54 PM
To: Diana Yedoyan <diana@hollywoodchamber.net>
Cc: Hollywood Plan <hollywoodplan@lacity.org>

Hello Diana,

Thank you for your comments. Your email and the letter attached have been received and filed.

Best,
Quetzalli

Quetzalli Enrique
Preferred Pronouns: she, her, hers
Planning Assistant
Los Angeles City Planning
200 N. Spring St., Room 667
Los Angeles, CA 90012
T: (213) 978-1175 | Planning4LA.org
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December 9, 2020

Ms. Linda Lou
Los Angeles Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, California 90012

Re: Hollywood Community Plan Update

Dear Ms. Lou:

On behalf of the Hollywood Chamber of Commerce and over 800 of our member organizations who employ over 115,000 individuals, **we urge the adoption of the Hollywood Community Plan (Plan) with the inclusion of specific clarifications to the Community Plan Implementation Overlay (CPIO) listed within this letter**. The Chamber would like to express our deep appreciation to the Planning Department for the years of work that has brought us the updated Plan draft and recognizes the importance of policies which provide clarity, incentive and transparency for development in our community.

The mission of the Hollywood Chamber of Commerce is to advance a dynamic business climate and elevate the Hollywood experience for all. This includes finding solutions to our housing crisis, ensuring our homeless neighbors are provided with housing and services, increasing economic development, and creating opportunities for pedestrian oriented design that will serve all members of Hollywood.

Since the last Hollywood Community Plan update in 1988, Hollywood has expanded clearing a need for more equitable housing opportunities, improved infrastructure, and additional support for the expanding entertainment industry. To ensure the success and proper implementation of the Hollywood Community Plan Update, the Hollywood Chamber of Commerce urges the recognition and adoption of the following changes/clarifications to the Update and CPIO:

1. **CRA Consistency**
   The Plan does not expressly state that it will control in the event of a conflict between the Hollywood Redevelopment Plan and the Plan as it is drafted. We ask that you include express language clarifying that the Plan controls in the event of any conflict with the Hollywood Redevelopment Plan with a citation to Section 502 of the Hollywood Redevelopment Plan.

2. **Transfer of Development Rights**
   It is unclear whether "historic resources" includes structures in the survey and whether they may be demolished without penalty. The CPIO should be updated to clarify that developers can remove eligible structures with documentation. Additionally, owners of a donor site and owners of a receiver site must execute a covenant recognizing the transferred floor area when executing a transfer of unused FAR from donor sites within the Regional Center subareas. Buildings inside the historic district should be provided additional air rights to increase the value of transfer when applicable.

3. **Historic Preservation**
   The timing of the historic review process and sequencing with the entitlement application and CEQA review is unclear and requires further clarification. Moreover, projects that include designated resources at the local,

state, or national level are subject to OHR review. The implementation of this review is also unclear, specifically if OHR will require non-demolition projects involving eligible resources to be consistent with the Secretary of Interior Standards. The Plan should provide clarity for developers and advocated alike to ensure full transparency.

4. **Affordable Housing Bonuses and Workforce Housing.**
   The CPIO provides bonus incentives for projects that provide affordable housing such as FAR, density, parking reduction and additional incentives. Overall, FAR permitted is low and is unclear how the City would process a new entitlement project requesting a discretionary action. Additionally, the threshold for discretionary site plan review is unclear and how it will work with the proposed incentive programs. The plan should provide incentives for the development of workforce housing which is not currently included.

5. **CRA Consistency**
   There is no guidance or clarification provided to address consistency with the Hollywood Redevelopment Project which are within the Community Plan area. It is unclear how the City will incorporate the Hollywood Redevelopment Plans into the Plan or how inconsistencies will be addressed. Express language must be added clarifying that the Plan controls in the event of any conflict with the Hollywood Redevelopment Plan with a citation to Section 502 of the Hollywood Redevelopment Plan.

6. **Maximum Footprint for Studios**
   In the current plan, the total floor area in subareas that allow media-related uses shall not exceed a Floor Area Ratio (FAR) of 1.5:1, except that a maximum FAR of 3:1 shall be permitted for developments which incorporate a minimum FAR 0.7:1 for targeted media-related industrial uses. The draft regulations list multiple Targeted Media-related uses, but there are no specific minimums or maximums for office and studio uses except certain subareas which require a minimum of 0.7 FAR targeted media related uses in order to obtain an increase in FAR. This must be clarified to avoid inconsistencies.

7. **Minimum/Maximum Lot Coverage**
   Within the CPIO, lot coverage, specifically increases, are an additional incentive for affordable housing projects. Up to 35% of additional lot coverage in subareas for projects that provide on-site affordable units. One Subarea (Subarea 17) has a limitation on lot coverage such at a maximum of 60% lot coverage is permitted. No other subareas have any further limitations. Site coverage appears to be primarily driven by Floor Area Ratio (FAR) that is either limited in the Q and D matrix or driven by the underlying zoning. We would like to see clear guidelines that address this issue.

8. **Ground Floor Retail/Commercial Space**
   Certain subareas place restrictions on restaurant or retail tenant uses on the Ground Floor. This limits the opportunity for rooftop restaurants or expanded retail beyond the ground floor in certain Subareas. Within the current draft, there is potential for studio campus development issues. For instance, existing and future buildings within the interior of the studio campus will not be able to provide street access. The measurement requirement does not make clear if it is referencing ceiling height or clear height. This creates inefficient parking and challenges for landlords to attract tenants for “active use” areas in the parking structures. Combined with existing parking requirements, would present feasibility issues for most development. This requirement reduces rentable floor area and decreases usable continuous floor plate area, which will be an issue for studio tenants.

9. **Building Heights**
   The Plan provides for a range of height limitations depending on subareas. We would like to see greater flexibility and consistency within different subareas.

10. **Parking**

Greater flexibility on parking such as additional parking reduction incentives may need to be implemented to support development of all types. There is no bicycle infrastructure listed in areas inside Regional Center and no proposed method for evaluating if parking supply is adequate, which will lead to potential issues with leasing of private parking as commuter lots.

These clarifications and proposed changes to the Hollywood Community Plan Update are vital in ensuring the overarching goals of the Community Plan are appropriately met. Together we must strive to accommodate expected growth, preserve neighborhoods, provide employment opportunities throughout all industries, creatively protect historic resources, encourage a variety of transportation options to our community members and visitors. Thank you for your attention to this matter and for your leadership on the Hollywood Community Plan Update and CPIO. If you have any questions please contact Diana Yedoyan, Vice President of Public Policy and Economic Development via email at (323)468-1380 ext 140 or diana@hollywoodchamber.net.

Sincerely,

Rana Ghadban
President & CEO

Connect Create Collaborate

Sophia Kim <sophia.kim@lacity.org>

6666 Yucca Street LA CA 90028

Sophia Kim <sophia.kim@lacity.org> Thu, Dec 10, 2020 at 1:07 PM
To: success <success@lovewhimsical.com>
Cc: Hollywood Community Plan <hollywoodplan@lacity.org>

Hello Queen,

Thank you for your email. It has been received and filed.

On Wed, Dec 9, 2020 at 4:59 PM success <success@lovewhimsical.com> wrote:

> Hi City Planning,
>
> My name is Queen Charis.
>
> Founder of Charis Worldwide.
>
> As City Planning already knows I wish to convert my building into a Hotel/Restaurant/Event Space.
>
> I have not purchased this building yet until I am secured I will not have pushback from the city.
>
> I wish to ask at the Public hearing may my property be Grandfathered in the new city plan due to there are restaurants the residents in the vicinity are walking to as well as a hotel.
>
> I do understand if the Plan does not support a new construction Hotel with over 200 units.
>
> Having a 20 unit boutique hotel will NOT make one difference to ease the affordable housing crisis in LA.
>
> I also can set aside affordable furnished units since I will offer 30 night stays.
>
> I look forward to a prosperous partnership with LA.
> Queen Charis
>
> Sent from my T-Mobile 4G LTE Device

--

LOS ANGELES CITY PLANNING

Sophia Kim
City Planning Associate
Los Angeles City Planning

200 N. Spring St.
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1208

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Linda Lou <linda.lou@lacity.org>

Comments on the Hollywood Community Plan Update

2 messages

Jorge Seperak <info@sg.actionnetwork.org> Thu, Dec 10, 2020 at 10:11 AM
Reply-To: seperakjs@gmail.com
To: hollywoodplan@lacity.org, linda.lou@lacity.org

Dear Ms. Lou,

The Hollywood Community Plan provides a great opportunity to make our community more equitable and just but the most recently proposed plan is a giveaway to luxury apartment and commercial developers. In parts of the plan area, the base FAR is over doubled to 4.5 FAR with no affordable housing requirements and only lackluster requirements (10% ELI) for projects that receive triple what is allowed currently. This will threaten existing housing and discourage the use of affordable housing incentives in favor of commercial and 100% market rate development. Please do not increase the Base FAR, but rather make sure any and all increases to building size are tied to affordability. Hollywood is already awash in commercial development, including thousands of new hotel rooms. We need more public oversight over commercial development, including a conditional use permit for hotels appealable to City Council and no new upzoning without affordable housing.

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Please support the Just Hollywood Plan!

Jorge Seperak
seperakjs@gmail.com
7777 Santa Monica Blvd#2
West Hollywood, California 90046

Linda Lou <linda.lou@lacity.org>
To: seperakjs@gmail.com
Cc: Hollywood Plan <hollywoodplan@lacity.org>

Hello Jorge,

Thank you for your email. It has been received and filed.

Best,

Linda

Linda Lou
Pronouns: She/Her/Hers
City Planner
Los Angeles City Planning
200 N. Spring St., Room 667
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1473
E-NEWS

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Connect Create Collaborate

Linda Lou <linda.lou@lacity.org>

LFIA HCP Public Hearing Testimony

2 messages

LFIA President <president@lfia.org> Tue, Dec 15, 2020 at 10:32 AM
To: hollywoodplan@lacity.org

Attached please find the testimony from Los Feliz Improvement Association (LFIA) from the December 9, 2020 public hearing for the Hollywood Community Plan Update.

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Amy Gustincic
President, LFIA
Advocacy and Action for Los Feliz
LFIA.org

2 attachments

LFIA_ICO request_2019-09-25.pdf
140K

LFIA_HCP Testimony_2020-12-14.pdf
445K

Sophia Kim <sophia.kim@lacity.org> Tue, Dec 15, 2020 at 10:37 AM
To: LFIA President <president@lfia.org>
Cc: Hollywood Community Plan <hollywoodplan@lacity.org>

Hello Amy,

Thank you for your email. It has been received and filed.
[Quoted text hidden]
--

LOS ANGELES CITY PLANNING

Sophia Kim
City Planning Associate
Los Angeles City Planning

200 N. Spring St.
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1208

E-NEWS

LFIA advocacy and action for Los Feliz

September 25, 2019

The Honorable David Ryu
Los Angeles City Hall
200 N. Spring St., Room 425
Los Angeles, CA 90012

Dear Councilmember Ryu,

The Los Feliz Improvement Association (LFIA) was pleased to see that on September 10, 2019 you voted YES on Council File 19-0939, supporting an Interim Control Ordinance (ICO) to prohibit the issuance of demolition, building, grading and other applicable permits in C2 zones, where the property is located immediately adjacent to an R1 or more restrictive zone and fronts a local street.

We recognize that by voting YES in this instance you chose to protect the integrity of a restrictive residential zone until the city plans could be updated. We would like to point out another inconsistency in the current municipal code which has resulted in the degradation of the R2 zone. This is Provision 12.09A3 (b) which allows corner lots in R2 zones to be re-zoned RD 1.5. This Provision was always inconsistent with the purpose of the R2 zone which is called the "two family" zone. However, when it was adopted in January of 2005, there were no density bonuses and no TOC. Today this Provision allows for extreme density in what is supposed to be a restrictive zone with no upgrades to infrastructure. Therefore, this provision threatens to destroy the very purpose of R2 zones and severely impact the quality of life for those who live there.

Witnessing your protections support in neighboring council districts and the "Neighborhood First" platform on which you ran for office, we believe rectifying the above described inconsistency is consistent with your principles. We have drafted an initial motion for your reference to assist you and your staff in expediting the process. We look forward to your support with this issue and please do not hesitate to reach out to the LFIA for further support.

Sincerely,

Amy Gustincic
President

Cc: Nicholas Greif
Justin Orenstein
Emma Howard

MOTION

WHEREAS the Los Angeles Municipal Code allows for several restrictive zones including the R2 zones.

AND WHEREAS The R2 zone was named the “two family” zone in accordance with the intention of the zone.

AND WHEREAS When the Code was updated in January 2005, to include Provision 12.09A3 (b) which allows corner lots in R2 zones to be re-zoned RD 1.5, the Provision was always inconsistent with the purpose of the R2 zone and led to the degradation of the zone.

AND WHEREAS The TOC and density bonuses currently allow developers to take advantage of this inconsistency in the code, completely destroying the intention of the R2 zone, severely taxing the infrastructure, and impacting the quality of life for those who live in R2 zones.

I THEREFORE MOVE that the Council instruct the Department of City Planning, in consultation with the City Attorney remove Provision 12.09A3 (b) from the Los Angeles Municipal Code in the Recode LA process.

I THEREFORE MOVE that the Council instruct the Department of City Planning, in consultation with the City Attorney, to prepare and present an Interim Control Ordinance (ICO), to prohibit the issuance of demolition, building, grading, and other applicable permits in R2 zones, where the property is located immediately adjacent to a commercial lot.

I FURTHER MOVE that the ICO include an Urgency Clause making it effective upon publication, and consistent with California Government Code Section 65858, the ICO run for 45 days, with a 10 month and 15 days extension by Council Resolution, and can be further extended for an additional year, or until the adoption of the appropriate in the municipal code.

LFIA advocacy and action for Los Feliz

December 14, 2020

Community Planning Bureau
Department of City Planning
City Hall, Room 667
200 N. Spring Street
Los Angeles, CA 90012

Dear Members of the Hollywood Community Plan Update Unit:

Comments on the Draft Hollywood Community Plan Update text, map, Environmental Impact EIR (DEIR), Zoning Ordinance, and Community Plan Implementation Ordinance (CPIO).
City Plan Case: CPC-2016-1450-CPU
Environmental Case: 2016-1351-EIR

1. Comments on policies and programs in the draft Hollywood Community Plan Update for the Los Feliz neighborhoods. (Presented orally by David L. Bell, Esq., Los Feliz Improvement Association Board Member)

Page 5-6 of the Community Plan Text, Chapter 5, contains a section on Historical Preservation Overlay Zones (HPOZs). It lists the six existing HPOZs in the Hollywood Community Plan area, and it indicates that a Melrose Hill Expansion Area is under study. This section should be amended to indicate that the Los Feliz Improvement Association has paid for and submitted an 18-volume historical survey of the Los Feliz are to the Department of City Planning's Office of Historic Resource and requested that the surveyed area be appropriately funded and designated as a large HPOZ or several smaller HPOZs. The LFIA submitted these architectural surveys to the Office of Historic Resources as a hard copy in 1996, and in electronic form in 2009, 2011, 2013, 2016, and 2018-19 as the area the survey covered was expanded.

Page 7-2 of the Community Plan Text, Chapter 7: Implementation contains Policy 29. *"Develop a historic preservation district or districts in Los Feliz with community involvement and support."* Policy 29 should be amended to indicate that the LFIA has prepared an 18-volume historical survey of contributing structures in Los Feliz, and the Association has submitted its survey to the Department of City Planning's Office of Historic Resources to fund and initiate the HPOZ preparation and adoption process.

Los Feliz Boulevard and Hillhurst Boulevard are listed for small zone changes in areas 13, 73, 77, 78, 79, 80. In addition, the LFIA requests that in the Los Feliz Village area, along Hillhurst and Vermont, from Los Feliz Boulevard to Prospect, RD 1.5 lots abutting commercial lots, be returned to their original R2 status. The purpose of these zone changes is to prevent displacement if or when the parcels are converted to quasi-Small Lot Subdivisions, per adopted Ordinance 185462 (LAMC 12.09.A.3).

The rational for these zone changes was detailed in the attached letter to Councilmember David Ryu, on September 25, 2019:

1. *The R2 zone was named the "two family" zone because of its original intention was to house two families on one parcel.*
2. *When the LAMC was updated in January 2005, it added Section 12.09.A.3.b., which allows R2 corner lots to be re-zoned RD 1.5. This provision was inconsistent with the purpose of the R2 zone, and it has led to the expansion of the zone to include non-two-family uses.*
3. *The City's two Density Bonus ordinances, TOC Guidelines and SB 1818, allow developers to undercut the original intention of the of the R2 zone, which then severely taxes infrastructure and impacts the quality of life of those who live in or near these R2 zones.*
4. *The Update of the Hollywood Community Plan should use its Zone Change amendments to the remove LAMC 12.09.A.3.b. in entirety or exclude its application in the Los Feliz neighborhoods.*

2. Comments of the Draft Hollywood Community Plan Update

After two decades of continuous LA City Planning efforts to update the 1988 Hollywood Community Plan, Superior Court Judge Allan J. Goodman overturned the 2012 Update of the Hollywood Community Plan for being "*fundamentally and fatally flawed*." Judge Goodman offered three reasons for his decision:

- The 2012 Update was based on outdated demographic data.
- The 2012 Update failed to consider the need to expand municipal services and infrastructure for additional buildings and people.
- The 2012 Draft Environmental Impact Report did not accurately consider the Draft Community Plan's environmental impacts.

His decision further indicated that in the absence of a valid Updated Community Plan text, map, Draft Environmental Impact Report, and implementing ordinances, the 1988 plan and its attachments would remain binding until Hollywood Community Plan was correctly updated and adopted.

When the City Council adopted the 2012 Hollywood Community Plan Update, extensive public testimony identified four other methodological flaws, all of which apply to the new 2020 Update of the Hollywood Community Plan, under consideration at the December 9, 2020, workshop and public hearing.

1. The 2012 Update, like the 2020 Update, was improperly sequenced. The previous and current Update should have followed, not preceded, the update of the General Plan's mandatory and optional citywide elements, including Air Quality, Conservation, Health, Public Safety, Mobility, Infrastructure Systems, Open Space, Public Facilities and Services, Noise, and Housing. At present most of these General Plan elements are out-of-date, with no schedule published for their updating, except for the Housing Element.

2. The 2020 Update, like the previous 2012 Update, conflicted with the City Council-adopted 1996 General Plan Framework Element, a growth-neutral, not a growth-inducing General Plan element. Both Community Plan Updates had/have extensive up-zoning ordinance appended, and they are therefore growth inducing, in conflict with General Plan Framework Element.

3. The 2020 draft update, like the previous 2012 Update, has also failed to calculate the potential build out of existing zoning, instead implying without supportive evidence, that current zoning was not sufficient to meet the needs of Hollywood's future population.

4. The 2012 Update, like the 2020 Update, did not include a monitoring unit and work program to verify the Update's demographic assumptions, whether its implementing

programs were in effect and met the Plan's goals, and whether the remaining capacity of public infrastructure and public services was sufficient to meet forecast user demand.

To begin the Hollywood Community Plan Update adoption process, the Los Angeles Department of City Planning will host a public meeting and hearing to obtain comments on its draft Hollywood Community Plan documents. The December 9, 2020, hearing will consider public testimony regarding the new Community Plan text and map, appended zoning ordinances and Community Plan Implementation Ordinance (CPIO), Draft Environmental Impact Report (DEIR), and a partially recirculated Draft Environmental Impact Report.

The open question is whether the Department of City Planning has accurately responded to Judge Allan J. Goodman's stunning rebuke of its previous 2012 Hollywood Community Plan. Based on the LFIA's review of the new 2020 Update, the answer is that the current draft Update repeats many of the same mistakes that jeopardized the 2012 Update. More specifically:

Outdated demographic data. In 2021 the new Hollywood Community Plan Update will go before the City Planning Commission and the City Council, 11 years after the Bureau of the Census collected its 2010 baseline census data. In 2016 the Census Bureau extrapolated its 2010 data, which the Department of City Planning augmented with forecasts from the California State Department of Finance and the Southern California Association of Governments (SCAG). Most tellingly, City Planning's 2040 population forecast exceeds SCAG's rosy 2040 forecast by 17,000 to 48,000 people. This growth forecast, without a sound justification, is labelled "Reasonable Expected Development" even though LA's population, like Hollywood's, is declining. The trend of population decline began before the Covid-19 Pandemic, which accelerated out-migration from Los Angeles. When or if this trend of population loss will reverse, is pure conjecture, including City Planning's population forecasts for the Community Plan horizon year of 2040.

Inadequate municipal services and infrastructure. The new Draft Environmental Impact Report indicates there will not be any upgrades to Hollywood's infrastructure, including upgraded water supply and electric power. The Update's rationale is that new development will be located in areas of Hollywood that have spare infrastructure and service capacity. As for any data or monitoring program substantiating this bold claim, the LFIA could not find them. Furthermore, the area for the proposed Community Plan Implementation Ordinance

(CPIO) is so vast, including the entire business district west of the Hollywood Freeway, plus the commercial corridors on LaCienega Boulevard, Melrose Avenue, Fairfax Avenue, LaBrea Avenue, Santa Monica Boulevard, Sunset Boulevard, Vine Street, and Western Avenue, that is not conceivable that existing infrastructure and public services can meet the needs of the additional people and buildings that the CPIO is likely to promote in these areas.

Ignored Environmental impacts. Every major project, like the updated Hollywood Community Plan, has serious environmental impacts, such as Green House Gas emissions, that cannot be eliminated. Instead, they can only be successfully mitigated by fundamentally redesigning the project, which the DEIR calls an *Environmentally Superior Alternative*. In this case, the DEIR labels this option the *Reduced Transit Oriented Development and Corridors Alternative*. Since the Hollywood Community Plan Update alternative that City Hall decision makers will consider for adoption rejects this alternative, the Update's Draft. Final, and Recirculated Environmental Impact Reports will require a Statement of Overriding Considerations. This Statement does not yet appear to exist, but based on previous EIR's, it will claim, without current or future verification, that the updated Community Plan will generate so many additional jobs, low-income housing units, and/or transit trips that decision makers can safely ignore its adverse environmental impacts.

The LFIA believes that the Statement of Overriding Considerations to justify the Update's unmitigable adverse environmental impacts precede the adoption process, so those closely following and impacted by the plan can know, in advance, its contents. This information should also include a monitoring process to confirm that any forecast low-income housing units, jobs, or transit trips appear, and that if they do not, the Certification of the project will be withdrawn.

Furthermore, the project description in the DEIR is missing critical information. It indicates that the Update will require the following ordinances, none of which exist, and all of which would have environmental impacts. The LFIA believes this information must be provided to the public prior to the adoption process, in particular amendments to the Vermont/Western Transit Oriented District Specific Plan (SNAP)

1. General Plan amendments.
2. Amendments to the Vermont/Western Transit Oriented District Specific Plan (SNAP).
3. Amendments for the enhanced networks map in the Mobility Plan 2035.
4. Amendments to the General Plan Framework Element and other citywide elements of the General Plan. (This appears to overlap with #1.)

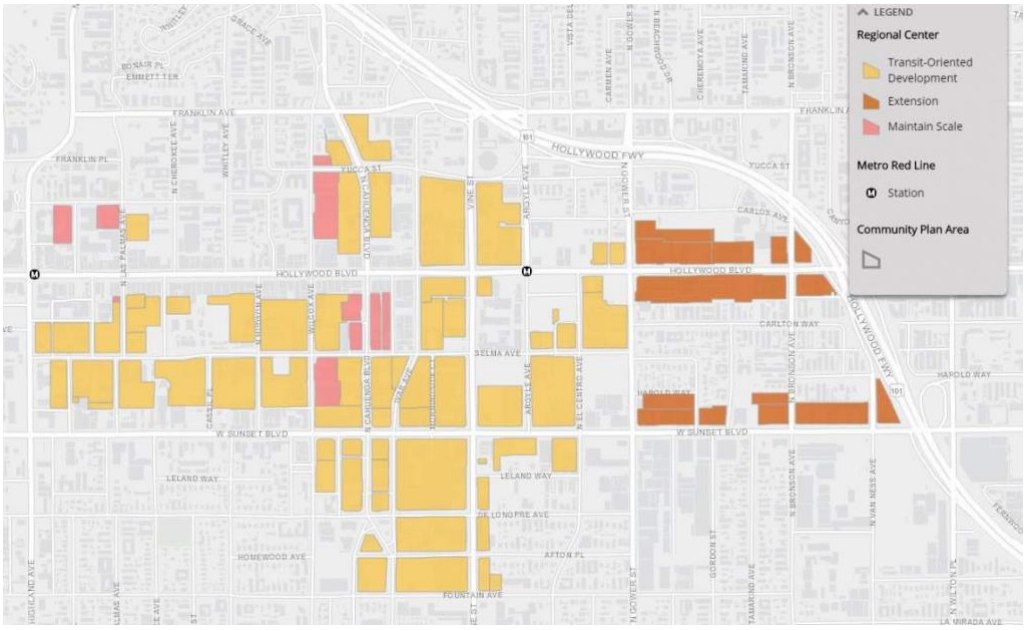
5. Amendments to all other relevant ordinances and actions, as necessary to ensure consistency of regulations and implementation of the Community Plan amendments.
6. Hillside Construction Regulation Supplemental Use District (Listed in public notice, not DEIR)

Improper sequencing. Like the 2012 plan that Judge Allan J. Goodman rejected, the current 2020 Hollywood draft Hollywood Community Plan Update also precedes the update of the General Plan's citywide elements, most of which are out-of-date. It makes frequent references to the 24-year-old General Plan Framework Element, while other relevant General Plan elements, particularly Infrastructure Systems and Public Facilities and Services, are 50 years old. City Hall should thoroughly update all of these General Plan elements before updating a local Community Plan that the Superior Court rejected because of old demographic data and inadequate infrastructure and public services.

Conflicts with the General Plan. The current Hollywood Community Plan Update repeatedly claims that it consistent with the existing General Plan, especially the 1996 General Plan Framework Element. But this is not the case because the Framework Element is clearly growth neutral. It is not growth-inducing, like the draft Hollywood Community Plan. The Framework, in contrast, presented two criteria for plan implementation ordinances that increased planned and zoned density and intensity.

First, the implementation ordinances so far shared with the public need to demonstrate that existing plan designations and zoning could **not** meet the housing needs of future Hollywood residents. As far as we could determine, neither the Updated Hollywood Plan nor its DEIR contained this information.

Second, based on the Framework Element's Objective 3.3: *("Accommodate projected population and employment growth within the City and each community plan area and plan for the provision of adequate supporting transportation and utility infrastructure and public services."),* the proposed implementation ordinances(s) must also present clear evidence that LA's public infrastructure and services can meet the needs of additional people and building. While the Hollywood Community Plan Update makes these claims, we could not find any data in the plan documents to substantiate these claims. Without these data, they remain unsupported assertions.



Proposed Update will increase density in Hollywood core.

Conflicts with zoning build out. The Update implies that Hollywood's existing zoning is inadequate to meet forecast demand for housing, and therefore the Update's implementation ordinances present an extensive program of up-zoning. But Hollywood has plenty of underutilized zoning, mostly commercial lots on transit corridors that are suitable for by-right apartment buildings. In fact, Hollywood's **existing zoning**, as presented on page 3-8 of the Draft Hollywood Community Plan Update, allows its population to double, reaching 470,000 people. This is 264,000 more people than SCAG's 2040 population forecast, repeatedly cited in the Update. If Accessory Dwelling Units and Density Bonuses are then factored in, Hollywood's population could reach 630,000 people. This is 426,000 more people than SCAG's 2040 forecast or 2040, and 366,000 more people than City Planning's 2040 *Reasonable Expected Development* population forecast.

Hollywood Community Plan Demographics

Zone	DUA (standard densities)	Acres of zoning	Units capacity (formula)	Persons/ Unit (standard input)	Persons Capacity (before bonus)	Add ADU and Density Bonus	Persons Capacity after ADU and TOC bonus
Minimal RE40	1.1	617	672	2.64	1,774	*25%*	2,217
Very Low II RE15	2.9	1459	4,237	1.89	8,008	25%	10,010
Low I RE9	4.8	353	1,709	1.89	3,229	25%	4,036
Low II R1	8.7	1941	16,910	1.89	31,960	25%	39,950
Low Medium I R2	35.0	1941	67,935	1.89	128,397	35%	173,336
Low Medium II RD1.5	29.0	798	23,174	1.89	43,799	35%	59,128
Medium R3	54.5	786	42,798	1.85	79,176	35%	106,887
High Medium R4	108.9	154	16,771	1.85	31,026	35%	41,885
High R5	217.8	77	16,771	1.87	31,361	35%	42,337
Commercial	*70.0*	851	59,570	1.87	111,396	*35%*	150,384
	Total Number of people				470,125		630,171

** No M zones included, three of which permit by-right apartments.*

** 50% of R1 zones may not fit ADU*

Clearly, Hollywood does not have a shortage of existing parcels available for all population growth scenarios. There is no reason for the Update to include a 96 page up-zoning ordinance and a companion 95 page Community Plan Implementation Ordinance for even more up-zoning. In light of Hollywood's existing and unused zoning capacity, at best new layers of zoning capacity will remain unused. At worst, they will increase the value of existing parcels and promote flipping by property owners. If the up-zoning ordinance do, however, result in larger buildings, the recent building boom in Hollywood indicates these buildings will contain expensive apartments occupied by tenants who own and use personal cars or Ubers for mobility. Since the decline in mass transit ridership in Hollywood has accompanied an increase in these Transit Oriented Development apartments, to build more expensive apartments will lead to more of the same results:

- Declining transit ridership.
- Eviction of long-term tenants.
- Demolition of buildings subject to the City's Rent Stabilization Ordinance.
- Increased traffic and related Green House Gas emissions.

One potential remedy to this situation should be added to the Hollywood Community Plan. The percentage of required low-income units in new residential projects should be raised to 25 percent. It must also be accompanied by an enforcement program that verifies the existence of promised low-income units and that they are rented to certified low-income tenants.

Failure to monitor the Update. The General Plan Framework, so frequently referenced in the current Update, requires City Planning to establish a General Plan Monitoring Unit. Once established, this unit would prepare and distribute annual General Plan monitoring reports. Without these reports, there is no way to determine if the Update's 146 implementation programs actually exist or if they successfully meet the Update's multiple planning goals. Furthermore, the Update is based on assumptions about forecast increases in population, housing, employment. Without monitoring, it is impossible to know if these demographic assumptions are correct, or if they should be adjusted upward or downward, along with the Update's closely related implementation programs.

In 2013, when Judge Allan J. Goodman ruled that the adopted Hollywood Community Plan was fatally flawed, he exposed a misuse of Community Plans as a land use scheme to increase the value of older commercial real estate through up-zoning. The current revision of the Hollywood Community Plan appears to be driven by the same agenda and it, therefore, does not pass the criteria presented in the 2010 judicial rejection of the previous Hollywood Community Plan Update.

Sincerely,
Amy Gustincic

President, LFIA

Attachment: LFIA letter dated September 25, 2019

Quetzalli Enrique <quetzalli.enrique@lacity.org>

Comments on the Hollywood Community Plan Update

2 messages

Jennifer Najarro <info@sg.actionnetwork.org> Tue, Dec 15, 2020 at 8:43 PM
Reply-To: jeni0210@outlook.com
To: hollywoodplan@lacity.org, linda.lou@lacity.org

Dear Ms. Lou,

The Hollywood Community Plan provides a great opportunity to make our community more equitable and just but the most recently proposed plan is a giveaway to luxury apartment and commercial developers. In parts of the plan area, the base FAR is over doubled to 4.5 FAR with no affordable housing requirements and only lackluster requirements (10% ELI) for projects that receive triple what is allowed currently. This will threaten existing housing and discourage the use of affordable housing incentives in favor of commercial and 100% market rate development. Please do not increase the Base FAR, but rather make sure any and all increases to building size are tied to affordability. Hollywood is already awash in commercial development, including thousands of new hotel rooms. We need more public oversight over commercial development, including a conditional use permit for hotels appealable to City Council and no new upzoning without affordable housing.

The Just Hollywood Coalition of faith, environmental, labor, community, and housing organizations has proposed changes to the Hollywood Plan to encourage affordable housing, protect RSO buildings, create new policies to promote local hiring, protect small business, incentivize the use of transit and encourage new, energy efficient buildings integrated into Hollywood's natural environment.

Please support the Just Hollywood Plan!

Jennifer Najarro
jeni0210@outlook.com
321 S Berendo St
Los Angeles, California 90020

Quetzalli Enrique <quetzalli.enrique@lacity.org> Wed, Dec 16, 2020 at 8:05 AM
To: jeni0210@outlook.com
Cc: Hollywood Plan <hollywoodplan@lacity.org>, Linda Lou <linda.lou@lacity.org>

Hello Jennifer,

Thank you for your comments. Your email has been received and filed.

Best,
Quetzalli

Quetzalli Enrique
Preferred Pronouns: she, her, hers
Planning Assistant
Los Angeles City Planning
200 N. Spring St., Room 667
Los Angeles, CA 90012
T: (213) 978-1175 | Planning4LA.org
E-NEWS

[Quoted text hidden]

Sophia Kim <sophia.kim@lacity.org>

Comments on the Hollywood Community Plan Update

Sophia Kim <sophia.kim@lacity.org> Tue, Dec 15, 2020 at 3:12 PM
To: mattw@groundgamela.org
Cc: Hollywood Community Plan <hollywoodplan@lacity.org>, Linda Lou <linda.lou@lacity.org>

Hello Matt,

Thank you for your email. It has been received and filed.

On Tue, Dec 15, 2020 at 3:06 PM Matt Wait <info@sg.actionnetwork.org> wrote:

> Dear Ms. Lou,
>
> The Hollywood Community Plan provides a great opportunity to make our community more equitable and just but the most recently proposed plan is a giveaway to luxury apartment and commercial developers. In parts of the plan area, the base FAR is over doubled to 4.5 FAR with no affordable housing requirements and only lackluster requirements (10% ELI) for projects that receive triple what is allowed currently. This will threaten existing housing and discourage the use of affordable housing incentives in favor of commercial and 100% market rate development. Please do not increase the Base FAR, but rather make sure any and all increases to building size are tied to affordability. Hollywood is already awash in commercial development, including thousands of new hotel rooms. We need more public oversight over commercial development, including a conditional use permit for hotels appealable to City Council and no new upzoning without affordable housing.
>
> The Just Hollywood Coalition of faith, environmental, labor, community, and housing organizations has proposed changes to the Hollywood Plan to encourage affordable housing, protect RSO buildings, create new policies to promote local hiring, protect small business, incentivize the use of transit and encourage new, energy efficient buildings integrated into Hollywood's natural environment.
>
> Please support the Just Hollywood Plan!
>
> Matt Wait
> mattw@groundgamela.org
> 1809 N Bronson Ave, Apt 5
> Los Angeles, California 90028

Quetzalli Enrique <quetzalli.enrique@lacity.org>

HCPU & CPIO Comments Submission

2 messages

Franklin Corridor Communities <franklincorridorpres@gmail.com> Tue, Dec 15, 2020 at 11:33 PM
To: hollywoodplan@lacity.org
Cc: contact@nithyaforthecity.com, councilmember.ofarrell@lacity.org

Dear Member of the Community Planning Bureau,

Thank you for accepting the attached HCPU & CPIO comments submission from the Franklin Corridor Communities.

Regards,
Susan Winsberg
President
Franklin Corridor Communities

HCPU Comments from the FCC.pdf
66K

Quetzalli Enrique <quetzalli.enrique@lacity.org> Wed, Dec 16, 2020 at 8:35 AM
To: Franklin Corridor Communities <franklincorridorpres@gmail.com>
Cc: Hollywood Plan <hollywoodplan@lacity.org>

Hello Susan,

Thank you for your email. It has been received and filed.

Best,
Quetzalli

Quetzalli Enrique
Preferred Pronouns: she, her, hers
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FRANKLIN CORRIDOR COMMUNITIES

Reinstating the Local Voice in Development Decision Making

December 15, 2020

Los Angeles City Planning
Community Planning Bureau
200 N. Spring Street, Room 667
Los Angeles, CA 90012
hollywoodplan@lacity.org

Re: Hollywood Community Plan Update, Comments from the Franklin Corridor Communities

Member of the Community Planning Bureau,

Franklin Corridor Communities (FCC) is a group of residents of Central Los Angeles who are concerned about the communities we live in and who feel that the plans and policies promoted by the City of Los Angeles are harming, rather than helping, our neighborhoods. We have reviewed the Hollywood Community Plan (HCPU) and would like to submit the following comments:

Land Use & Urban Form

In general, we feel that the HCPU merely continues the City's failed housing policies. The HCPU and the Community Plan Implementation Overlay (CPIO) propose the creation of affordable housing through density bonuses, but this approach has been failing for years. City Planning's Housing Progress Dashboard shows that of the 158,000 units approved since July 2013, only 12% have been affordable. The density bonus approach basically locks new residential development into a framework where the majority of new housing is for the wealthy, and average Angelenos are left to compete for crumbs.

Furthermore, the reliance on density bonuses incentivizes the destruction of existing housing. The Housing Dashboard says that 19,000 new affordable units have been approved, but it does not mention the fact that existing units, often RSO units, are demolished to make way for these projects. The fact that the loss of existing units is not calculated to show what the actual net gain is undermines the City's claims about new units created.

We don't need more luxury units. We need more affordable housing. What the FCC wants most is for the City to enact policies which truly support the preservation of existing housing stock, rather than encouraging developers to demolish housing by dangling lucrative density bonuses in front of them. The HCPU contains language regarding the preservation of existing housing, but in fact, the City's ordinances and policies do exactly the opposite. The LAMC currently allows developers receiving density bonuses to count replacement units when calculating affordable housing requirements, which means the actual net gain is often very small. The City also exempts hotel projects from replacement requirements, which encourages the destruction of existing housing. The HCPU's language regarding the preservation of existing housing means nothing until the LAMC is revised to address these issues.

Parks and Open Space

The HCPU needs to exclude balconies and rooftops in its definition of open space. Their inclusion in the definition of open space is merely a dodge to allow developers to maximize the size of their project.

The HCPU must not include the creation of the Hollywood Central Park/101 CAP Park as one of its programs. This project is driven by private development interests. No Quimby funds or other public money should be directed to this CAP Park. Since 2011, over $2,000,000 has already been spent on the EIR for this project, and still the EIR has not been released. We absolutely oppose the further diversion of public funds for this project, since its purpose is to promote gentrification in the Hollywood area, and it was clearly designed to promote private profit rather than the public good.

The HCPU should focus on the preservation and enhancement of existing community-serving parks. We absolutely oppose the inclusion of the CAP Park as one of the HCPU's proposed programs.

Preservation

While the HCPU discusses preservation at length, again, the City's policies and ordinances have shown themselves to be inadequate to actually support the preservation of historic buildings and communities. A perfect example of the City's hypocrisy on this issue is the inclusion in the CPIO of a provision giving the Director of Planning final say over historic designations. The City needs to rely on the expertise of the Office of Historic Resources and the Cultural Heritage Commission to determine whether or not a structure or neighborhood is historic. The language allowing the Director of Planning to have the final say is unacceptable and we insist that it be removed.

In general the City needs to strengthen its protections for historic resources.

We ask that the City complete the process of downzoning and designating the residences and multi-family residences on Whitley Avenue north of Franklin Avenue as part of the Whitley Heights Historic District.

This process was begun years ago, but unfortunately never completed. As a result, centenarian structures that have stood since the early days of Hollywood have no Development protections and are actively, speculatively being targeted and demolished.

Hollywood Hills West Neighborhood Council Motion of Support

February 26, 2018
Councilmember David Ryu
Los Angeles City Hall

Re: Support of Hollywood Heritage's request to downzone 10 parcels of Ocean View Tract

Dear Councilmember Ryu,

The Board of the Hollywood Hills West Neighborhood Council (HHWNC) met on Wednesday,

February 21, 2018, during which time the Board considered the above referenced item. The following motion was put forward and passed by the Board (17 yes, 1 no.)

Motion: *That the HHWNC Board adopt Area 3 / Area 4 / Housing Committees' recommendation to support Hollywood Heritage's proposal to downzone 10 properties with construction dates from 1919 to 1928 to match the adjacent Whitley Heights Preservation Overlay Zone Historic District zoning.*

Please attach this letter with motion of support into any files you deem appropriate.

HHWNC

Council District Four, Councilmember David Ryu 4.16.2018 Discussion Objectives

a. *Immediate implementation of Interim Control Ordinance (ICO) to protect 13 identified parcels immediately adjacent to National Register Historic District Whitley Heights / Historic Preservation Overlay Zone Whitley Heights and allow proper evaluation of the parcels as Historic District Contributors with implementation of appropriate protections and downzoning via HCPU-2 inclusion.*

The CPIO offers generous density bonuses throughout Central Hollywood, but the FCC asks that height limitations be imposed on projects built adjacent to historic Hollywood Boulevard.

Mobility, Connectivity, Circulation

One of the City's key arguments for increasing density in the Hollywood area is that it will promote transit ridership and active transportation. Numerous high-density projects have been built in the area over the past decade, but transit ridership has been declining since 2014. In making projections regarding vehicle miles travelled, greenhouse gas emissions and other emissions, the HCPU EIR allowed significant reductions based on assumptions regarding transit-oriented development. These assumptions are not supported by the facts. Also, while the City claims that high-density projects will promote walking and biking, it has presented no evidence to show that gains have been made in these areas as a result of recent transit-oriented development. California laws which promote density to fight climate change have been a failure when it comes to increasing transit ridership. Rather than continuing to pretend that this approach will get people out of cars and onto buses and trains, the City needs to acknowledge the failure and adopt realistic policies to address the problem.

We are very concerned about the proposed Heart of Hollywood project, and the plan to reduce the number of lanes on Hollywood Boulevard. Impacts from this project were not assessed in the transportation section of the HCPU EIR, which calls into question the EIR's conclusions about traffic and transportation. If implemented, the Heart of Hollywood plan will push traffic from Hollywood Boulevard onto already congested east/west corridors like Franklin Avenue and Sunset Boulevard.

HCPU Community Plan Implementation Overlay

The HCPU CPIO designates the area bounded by Franklin, Cahuenga, Yucca and Highland as multi-family residential/high-medium residential. The FCC believes this area should be designated as character residential. The current designation will offer substantial incentives to developers to demolish existing housing, much of it RSO housing. Also, increased density in

this area will only cause more congestion on east/west corridors. Franklin Avenue especially is already heavily congested at rush hour and beyond.

The current multi-family residential/high-medium residential designation for this area will also incentivize the destruction of existing housing. Displacement is already a serious problem in Hollywood.

Tree Canopy

The HCPU includes language that seems to promote preservation of the area's tree canopy, but again, without legislation in place, this means nothing. The area around Franklin Avenue between Cahuenga and Highland has seen the loss of dozens of trees in recent years due to development. Talk about preserving trees is pointless without stronger protections in place, and real enforcement capabilities. Let's be honest, mature trees and protected trees are routinely cut down in LA, and the City does not even enforce laws that are currently on the books. The City's practice of handing out generous entitlements, often reducing setbacks and required open space, actually encourages developers to cut down trees, and they know that the City will impose no consequences even if they break the law.

The language in the HCPU regarding tree canopy sounds nice, but the CPIO's density bonus provisions will inevitably result in the further degradation and destruction of the area's tree canopy. If the City is truly serious about protecting Hollywood's declining tree canopy, it will include language in the CPIO which imposes rigorous protections for mature trees and protected trees, and it will boost funding for the Urban Forestry Department in order to actively promote preservation of the tree canopy.

Sincerely,
Susan Winsberg
President
Franklin Corridor Communities

Quetzalli Enrique <quetzalli.enrique@lacity.org>

Comments on the Hollywood Community Plan Update

2 messages

Noelle Armstrong <info@sg.actionnetwork.org> Wed, Dec 16, 2020 at 9:13 AM
Reply-To: armstrong.noelle@gmail.com
To: hollywoodplan@lacity.org, linda.lou@lacity.org

Dear Ms. Lou,

The Hollywood Community Plan provides a great opportunity to make our community more equitable and just but the most recently proposed plan is a giveaway to luxury apartment and commercial developers. In parts of the plan area, the base FAR is over doubled to 4.5 FAR with no affordable housing requirements and only lackluster requirements (10% ELI) for projects that receive triple what is allowed currently. This will threaten existing housing and discourage the use of affordable housing incentives in favor of commercial and 100% market rate development. Please do not increase the Base FAR, but rather make sure any and all increases to building size are tied to affordability. Hollywood is already awash in commercial development, including thousands of new hotel rooms. We need more public oversight over commercial development, including a conditional use permit for hotels appealable to City Council and no new upzoning without affordable housing.

The Just Hollywood Coalition of faith, environmental, labor, community, and housing organizations has proposed changes to the Hollywood Plan to encourage affordable housing, protect RSO buildings, create new policies to promote local hiring, protect small business, incentivize the use of transit and encourage new, energy efficient buildings integrated into Hollywood's natural environment.

Please support the Just Hollywood Plan!

Noelle Armstrong
armstrong.noelle@gmail.com
567 N COMMONWEALTH AVE
LOS ANGELES, California 90004

Quetzalli Enrique <quetzalli.enrique@lacity.org> Wed, Dec 16, 2020 at 9:29 AM
To: armstrong.noelle@gmail.com
Cc: Hollywood Plan <hollywoodplan@lacity.org>, Linda Lou <linda.lou@lacity.org>

Hello Noelle,

Thank you for your comments. Your email has been received and filed.

Best,
Quetzalli

Quetzalli Enrique
Preferred Pronouns: she, her, hers
Planning Assistant
Los Angeles City Planning
200 N. Spring St., Room 667
Los Angeles, CA 90012
T: (213) 978-1175 | Planning4LA.org
E-NEWS

[Quoted text hidden]

Linda Lou <linda.lou@lacity.org>

Comments re Hollywood Community Plan Update

2 messages

Nyla Arslanian <nyla@discoverhollywood.com> Wed, Dec 16, 2020 at 4:19 PM
To: hollywoodplan@lacity.org
Cc: CouncilmemberOfarrell@lacity.org, CouncilmemberRaman@lacity.org, CouncilmemberKoretz@lacity.org

Please find comments attached.

Best regards,

Nyla

Discover HOLLYWOOD MAGAZINE

Nyla Arslanian | Editor
www.discoverhollywood.com
(323) 465-0533
5419 Hollywood Blvd., Suite C717, Hollywood, CA 90027

Hwd Comm Plan Update comments.pdf
1483K

Linda Lou <linda.lou@lacity.org>
To: Nyla Arslanian <nyla@discoverhollywood.com>, Hollywood Plan <hollywoodplan@lacity.org>

Hello Nyla,

Thank you for your comment letter. It has been received and filed.

Best,

Linda

Linda Lou
Pronouns: She/Her/Hers
City Planner
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Discover
HOLLYWOOD MAGAZINE
EXPLORING THE UNIQUE CULTURE AND LORE OF HOLLYWOOD
SINCE 1985

December 16, 2020

Department of Planning
City of Los Angeles
200 N. Spring Street
Los Angeles, CA 90012

Re: Hollywood Community Plan Update
Case: CPC-2016-1450-CPU

To Whom It May Concern:

Having been engaged in the process of planning for the future of Hollywood for decades, first extensively under the direction of the Community Redevelopment Agency and the City Planning Departments second offering for the Hollywood Specific Plan, attempting to determine the future of this place called Hollywood is a complex undertaking.

How do you reconcile a place where much of the historic infrastructure in the form of its already built environment reflects that time in its development when the place created a product that had an impact on the entire world. Indeed, a place that to this day is attracting a new generation that appreciates this tradition and actively promotes and engages in it.

As a place, in its entirety, it rates declaration as a landmark as its commercial and residential areas could meet the three criteria for designation by the city's Cultural Heritage Commission.

As such preservation and the tradition of Hollywood's arts and culture must be the backbone of planning for this area of the city. While designated a region, few realized when the community aligned to route the subway through Hollywood, that in the 21st century, it would prove to be its undoing as it becomes sought after real estate and high rise development?

Incentives for the expression of the arts and cultures could be provided beyond what has been designated the Theatre District when, in fact, much of Hollywood itself is a Theatre and Arts District. While business and development interests focus on the value of their holdings and the profit that can be derived, the essence of a place is as important and necessary to be addressed in the planning of any region. This is the challenge that we look to the planning professionals to address.

There is only one Hollywood. Until 20 years ago, it languished in its faded glory. Still, annually it attracted millions of visitors who drove its boulevards and strolled its Walk of Fame. It's aging apartment buildings provided affordable housing and its few hotels operated at capacity. Today the climate is much different as its real estate has become a sought after commodity.

Continued....

There is no other place in the city, the state, the country and, indeed, the world with the significance of this place. Los Angeles is not synonymous with Hollywood. In addition to the Hollywood Boulevard corridor that is listed on the National Register, there are scores of other structures that should be the backbone of planning for the future of Hollywood.

The Community Plan Draft Update and Draft CPIO have preservation as a goal but while areas are determined to be "character residential," there is more than residential properties that could be designated as "character."

Of specific concern is the upzoning of scores of known subareas with historic buildings. Rather than upzoning and demolition in historic areas, provide incentives for conversion and adaptive use of commercial and older residential multi-family properties. That the city has allowed demolition of affordable housing when a housing crisis exists is not only not good planning, it's deplorable.

Without the Hollywood Plan in place, this character of the place is being undermined and overwhelmed with high rise projects and do nothing to retain the essence of this unique entity called Hollywood.

It is essential that protection for all historic buildings in this area be initiated. It's impossible for the preservation community, no matter how dedicated, to address historic properties parcel by parcel. This is the role of planning.

It is a sad commentary that the fate of this critical Los Angeles' resource rests with the Planning Department. The impact of dollars contributed to various programs and campaigns of our elected officials and the recent scandal have far reaching implications and a lack of trust in the system.

You are the professionals who are charged with this task. You are trained to see beyond the borders of this region, city and state and maximize the authenticity and unique assets of this place called Hollywood. Otherwise, this beautiful and historic place and its cultural significance will be lost.

Sincerely,

Nyla C. Arslanian
Editor

cc: Councilmember Mitch O'Farrell, Councilmember Nithya Raman, Councilmember Paul Koretz

Note: I have been engaged in community planning activities since 1979 first as president of the Hollywood Arts Council for 33 years, and as an elected member of the CRA Project Area Committee and appointed to the CRA Hollywood Arts Design Advisory Panel. I also served 6 years on the board of the Hollywood Chamber of Commerce. I am vice-president of Arslanian & Associates, Inc., an entertainment marketing firm established in 1980, which owns Discover Hollywood Magazine.

Quetzalli Enrique <quetzalli.enrique@lacity.org>

Comments on the Hollywood Community Plan Update

2 messages

Emily Elbert <info@sg.actionnetwork.org> Wed, Dec 16, 2020 at 11:22 AM
Reply-To: emily@emilyelbert.com
To: hollywoodplan@lacity.org, linda.lou@lacity.org

Dear Ms. Lou,

The Hollywood Community Plan provides a great opportunity to make our community more equitable and just but the most recently proposed plan is a giveaway to luxury apartment and commercial developers. In parts of the plan area, the base FAR is over doubled to 4.5 FAR with no affordable housing requirements and only lackluster requirements (10% ELI) for projects that receive triple what is allowed currently. This will threaten existing housing and discourage the use of affordable housing incentives in favor of commercial and 100% market rate development. Please do not increase the Base FAR, but rather make sure any and all increases to building size are tied to affordability. Hollywood is already awash in commercial development, including thousands of new hotel rooms. We need more public oversight over commercial development, including a conditional use permit for hotels appealable to City Council and no new upzoning without affordable housing.

The Just Hollywood Coalition of faith, environmental, labor, community, and housing organizations has proposed changes to the Hollywood Plan to encourage affordable housing, protect RSO buildings, create new policies to promote local hiring, protect small business, incentivize the use of transit and encourage new, energy efficient buildings integrated into Hollywood's natural environment.

Please support the Just Hollywood Plan!

Emily Elbert
emily@emilyelbert.com
567 N. Commonwealth Ave
Los Angeles, California 90004

Quetzalli Enrique <quetzalli.enrique@lacity.org> Wed, Dec 16, 2020 at 11:38 AM
To: emily@emilyelbert.com
Cc: Hollywood Plan <hollywoodplan@lacity.org>, Linda Lou <linda.lou@lacity.org>

Hello Emily,

Thank you for your comments. Your email has been received and filed.

Best,
Quetzalli

Quetzalli Enrique
Preferred Pronouns: she, her, hers
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E-NEWS

[Quoted text hidden]

Connect Create Collaborate

Quetzalli Enrique <quetzalli.enrique@lacity.org>

HCPU2 Comment Letter (Epicenter Landcorp/Quixote)

2 messages

Lauren Chang <lchang@sheppardmullin.com> Wed, Dec 16, 2020 at 2:53 PM
To: "linda.lou@lacity.org" <linda.lou@lacity.org>
Cc: "hollywoodplan@lacity.org" <hollywoodplan@lacity.org>, Quetzalli Enrique <quetzalli.enrique@lacity.org>

Hi Linda,

On behalf of our client Epicenter Landcorp, we're providing the attached comment letter regarding the Hollywood Community Update Plan and recommended changes to be considered. Please let us know if we can provide any additional information. We appreciate the opportunity to continue to engage with the City on this matter.

Best,

Lauren K. Chang

(she/her/hers)
+1 213-617-5588 | direct

+1 858-900-4959 | mobile
lchang@sheppardmullin.com | Bio

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Epicenter Landcorp LLC - 1027 Lillian Way - HCPU Comment Letter (December 2020), 4824-4718-2548 v 2.pdf
635K

Quetzalli Enrique <quetzalli.enrique@lacity.org> Wed, Dec 16, 2020 at 4:19 PM
To: Lauren Chang <lchang@sheppardmullin.com>
Cc: Hollywood Plan <hollywoodplan@lacity.org>, Linda Lou <linda.lou@lacity.org>

Hello Lauren,

Thank you for the comment letter. It has been received and filed.

Best,
Quetzalli

LOS ANGELES CITY PLANNING

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[Quoted text hidden]

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File Number: 76EM-326706

December 16, 2020

VIA E-MAIL

Linda Lou
City Planner
City of Los Angeles
200 N. Spring Street, Room 667
Los Angeles, CA 90012
E-Mail: linda.lou@lacity.org

Re: Epicenter Landcorp LLC's Comments on the Hollywood Community Plan Update (CPC-2016-1450-CPU)

Dear Ms. Lou:

We represent Epicenter Landcorp LLC("Property Owner" or "Epicenter"). This letter serves as our comment on the draft Hollywood Community Plan ("HCPU2" or "Update"), released by the City of Los Angeles ("City") for public review in August 2020. Epicenter and its affiliates own the entire block of property bounded by Eleanor Avenue to the North, Lilian Way to the East, Romaine Street to the South, and Cahuenga Boulevard to the West in Los Angeles, California, APNs: 5533-016-008, 5533-016-012, 5533-016-013, 5533-016-014 (the "Property").

Epicenter is a real estate investment and operating platform focused on developing entertainment-related real estate properties with an emphasis on film and television sound stages. Epicenter is an affiliate of Los Angeles-based Quixote Studios,[1] a leading provider of studios, vehicles, and equipment to television and film production companies. Quixote Studios, the current tenant of the Property, has been a vital contributor to content production in the City for the past 25 years. Namely, Quixote Studios is the first independent studio to develop purpose-built stages in the City over the last 15 years making it possible and affordable for companies to shoot various types of content in town. Epicenter and Quixote Studios are committed to the further development of media and entertainment uses in Hollywood and in the Media Use Expansion Subarea of the HCPU2.

As discussed in more detail below, Epicenter seeks to potentially redevelop the Property in the future for a possible range of uses including:

[1] https://quixote.com/

- Movie Studios/Production Sound Stages, Television/Film Production, and Ancillary Production Spaces.

- Other Creative Office Uses.

- Mixed-Use Development with Commercial Uses (including retail and restaurant uses).

While these uses are largely consistent with the proposed zoning for the Property under the HCPU2, the proposed FAR greatly limits the development potential. In order to fulfill the HCPU2's intent for the Media/Entertainment Jobs Subarea of which the Property is a part, a increased FAR is necessary to achieve the greatest potential and maximum benefit to the community.

Additionally, the proposed zoning limits retail and restaurant uses to the ground floor only and individual premises to 20,000 square feet ("SF"). This is not consistent with current and projected future trends and needs in retail/restaurant industries and thus further flexibility is needed to ensure that these uses remain buildable, leasable, and attractive to both the existing Property Owner and future tenants.

As such, we request the City to make the following revisions to the HCPU2 (Subarea 40:1B):

- Modify D Limitation No.1 to permit an FAR of up to 4.5:1 instead of the currently proposed 3:1 with the provision of an increased minimum FAR dedicated to targeted media-related uses.

- Remove Condition No. 2 of the proposed Q Condition which restricts retail and restaurant uses to the ground floor and limits such individual premises to 20,000 SF.

I. Existing Conditions

The Property is located a block south of Santa Monica Boulevard and bounded by Eleanor Avenue, Lilian Way, Romaine Street and Cahuenga Boulevard as shown in *Figure 1* below. The Property is approximately 74,636 SF or 1.71 acres and is currently improved with approximately 36,704 SF of studio/post-production, warehouse, and flex space. These uses were primarily developed in the 1960s, and thus the existing uses and Property Owner have a long-term presence in Hollywood. The Property does not have a height limit and the FAR is limited to 1.5:1 per current zoning.

The Property is currently zoned MR1-1-SN with a land use designation of General Manufacturing (See Attachment A, ZIMAS Parcel Profile Report). The MR1 zone primarily permits industrial uses including motion picture and film-related uses, studios, and various types of manufacturing uses. Commercial uses are limited to those that are devoted primarily to manufacturing and retail/restaurant uses are typically only permitted as an accessory to this primary use. The Property is surrounded by a range of similar studio and production uses to the north, south, and west. An early education center and elementary school are located to the east and southeast of the Property.

Recently, there has been an increase in development activity in the nearby vicinity to develop and repurpose existing industrial and movie production uses into more intense studio, creative office, and retail uses. For example, just this year, two existing industrial buildings located at 837 N. Cahuenga Boulevard were approved to be repurposed to new multimedia production space including studios, artists rooms, accessory office space, accessory kitchen, bar and lounge area including a rooftop lounge, and other storage uses.[2] Similarly, the Sunset Gower Studios located at 6050 W. Sunset Boulevard received approval this year to undertake an expansion to their existing campus which will include the construction of over 600,000 SF of new floor area to include additional production spaces, creative office, and restaurant spaces.[3]

This intensification, expansion, and development shown in the project examples above is consistent with the proposed vision for the Property and adjacent parcels as identified in the HCPU2. The Property Owner desires to have the option to expand its existing uses consistent with the recent example projects noted above to truly contribute to the HCPU2 goals of "media expansion" as discussed further below.

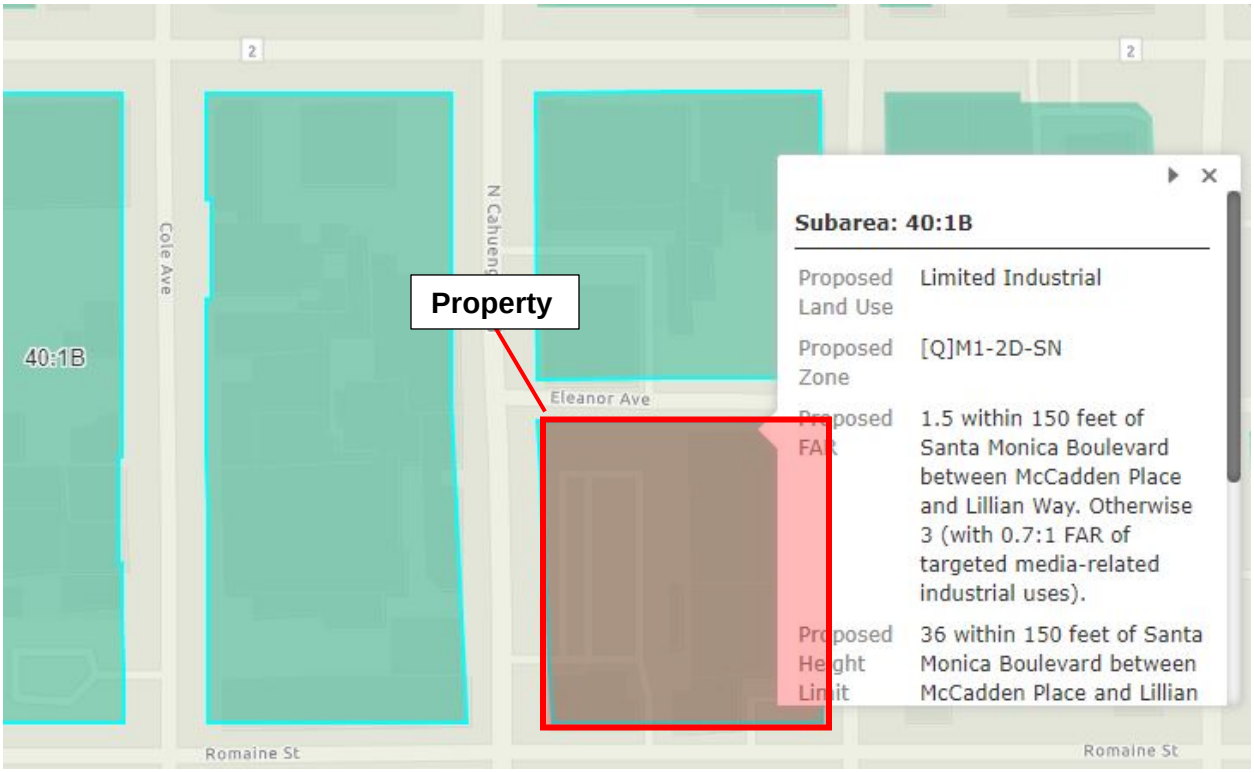
Figure 1

[2] See Case No. Case No. ZA-2020-268-ZV-ZAI-CUB.
[3] See Case No. CPC-2017-5090-VCU-CU-SPR; See also: https://urbanize.city/la/post/sunset-gower-studios-expansion-slated-begin-construction-2024.

II. Proposed Zoning in Draft HCPU2

The Property is part of the proposed Subarea 40:1B as shown in *Figure 2* below and is proposed to be rezoned as [Q] M1-2D-SN.

Figure 2



On balance, the M1 Zone is more permissive than the existing designation of MR1 in regards to uses as the M1 Zone permits C2 commercial uses as the primary use. The proposed rezoning would now include additional Q Conditions and D Limitations that the Property would be subject to including:

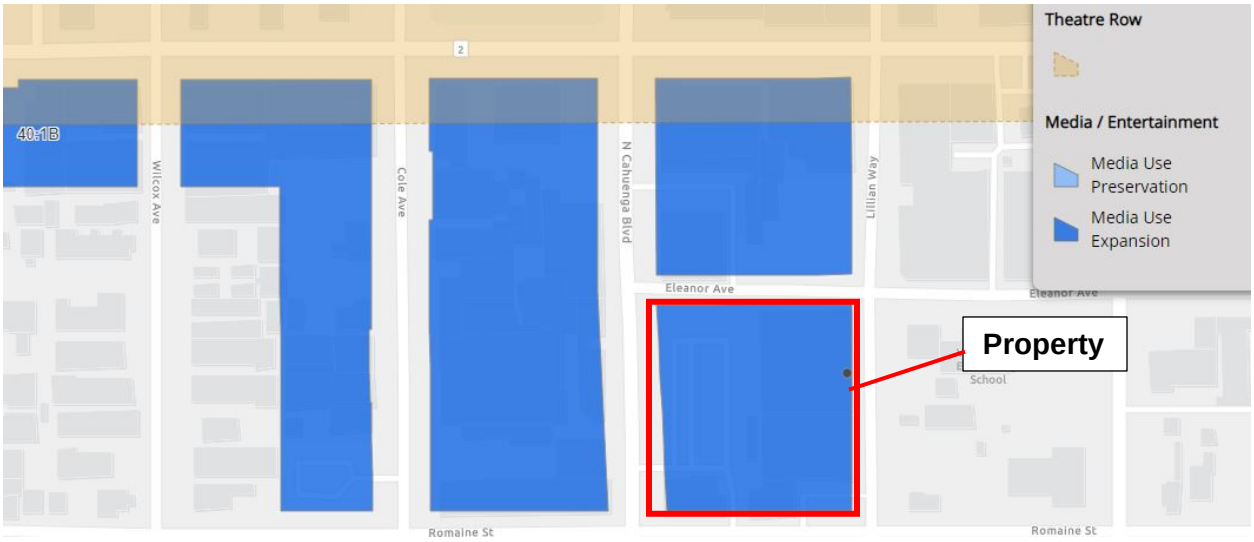
a) No residential development, including artist-in-residence or live-work conversion, except for a watchman or caretaker as permitted by the M1 zone.

b) Retail and restaurant uses are limited to the ground floor and individual retail and restaurant premises shall not exceed 20,000 SF.

c) The total flor area of all buildings and structures are limited to an FAR of 1.5:1, except that a maximum FAR of 3:1 shall be permitted for developments that incorporate a minimum of 0.7:1 FAR for the following targeted media-related industrial uses.

Per the HCPU 2's online Interactive Map, the Property is designated as part of the Media Use Expansion Subarea as show also below in *Figure 3.*

Figure 3



This Subarea is intended to "focus on increasing light industrial employment primarily in the entertainment and media-related industries." The description further notes that studios and related media uses "are vital not only to Hollywood's economic vitality but also to its identity as the entertainment capital of the world."

As discussed further below, the proposed Q and D Limitations on the Property could limit the Property Owner's ability to follow through on the intent of the Media Use Expansion Subarea as well as to make maximum use of the Property in a way that creates the greatest benefit for the community.

III. Proposed Revisions to HCPU2 and Justification

Epicenter requests that the City make the following revisions to Subarea 40:1B:[4]

- Modify D Limitation No.1 to permit an FAR of up to 4.5:1 instead of the currently proposed 3:1 with the provision of the appropriate FAR dedicated to targeted media-related uses to achieve the higher FAR.

[4] The Property Owner is aware that Subarea 40:1B covers a large area of parcels in the Community Plan Area and that the City intends to place standards and restrictions on these parcels as a cohesive unit. The Property Owner is open to further discussion with the City as to the applicability of the revisions only to the subject Property and/or the whole Subarea as the City deems appropriate.

- Remove Condition No. 2 of the proposed Q Condition which restricts retail and restaurant uses to the ground floor and limits such individual premises to 20,000 SF.

As discussed in more detail below, the City should incorporate these suggested amendments for several reasons. First, recent expansion and redevelopment in the area primarily for media-related uses indicates that there is a desire for growth of these services in the area. Further, recent developments in the vicinity have placed retail and commercial uses on different floors including on the rooftop. With the impacts of the COVID-19 pandemic which remain to be seen, there is a greater need for larger and flexible spaces for restaurant and retail uses to accommodate social distancing and allow for multiple tenants to potentially occupy the same space. Making the above modifications would allow Epicenter or potential future investors to maximize the future development potential of the Property in a way that supports the overarching goals of the HCPU2, maintains consistency with surrounding uses, and allows for flexible usage in a post-COVID environment. Importantly, the requested changes would not trigger recirculation of the City's Draft EIR. The zoning is consistent with the programmatic goals of the HCPU2.

A. Increased FAR

The Proposed 3:1 FAR is not sufficient to support the goals of the Media Use Expansion Subarea. Even though the Property is not currently developed to the maximum FAR, the Property Owner has great interest in maximizing the development potential in the future. As noted earlier, the Property Owner and its affiliate Quixote Studios specialize in the type of entertainment and media production uses that the City desires to see developed in this particular area of the HCPU2. However, in order to expand existing media-related uses and provide more jobs, the City must permit a greater FAR to ensure marketability and to attract users to utilize the Property. This includes the provision of more production support services, storage, and other ancillary uses on-site to attract investors and end users of the Property. The Property Owner is thus interested in proposing an increase in FAR of up to 4.5:1.

Specifically, the Property Owner would like to have maximum flexibility in order to develop a strategy that supports existing uses and permits additional growth vertically. This strategy is consistent with the example projects cited above at 837 N. Cahuenga and 6050 W. Sunset Boulevard which are proposing to develop much-needed support spaces (e.g., sound stage, production support space, office space, artists rooms) in vertically designed multiple-floor buildings to continue to support and expand existing media-related operations.

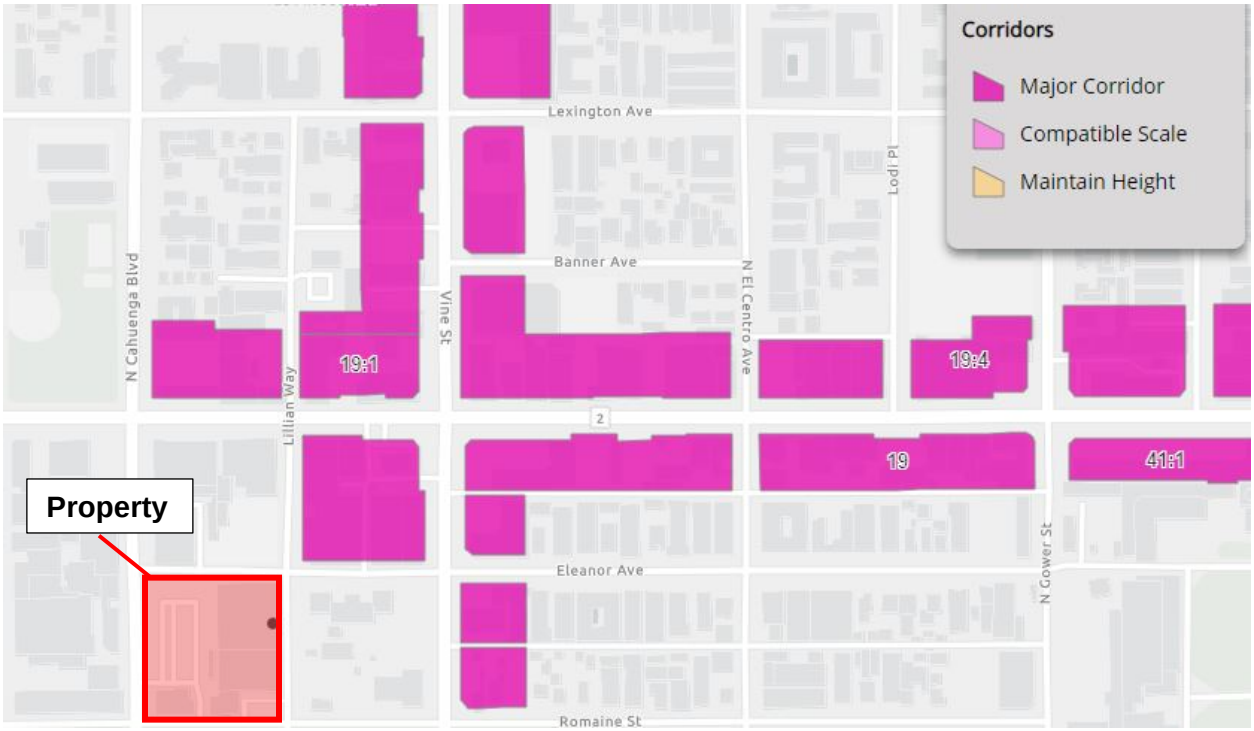
As currently drafted, Subarea 40:1B requires the provision of a minimum of 0.7 FAR dedicated to targeted media-related uses in order to achieve up to 3:1 FAR. The Property Owner would be interested in working with the City to increase this minimum targeted FAR requirement for media-related uses in order to obtain an FAR of up to 4.5:1.

Per the HCPU2, properties specifically within 150 feet of the property line along Santa Monica Boulevards are further restricted in terms of height and FAR. Thus, areas such as the Property that do not fall within this limitation, but are nearby, should be encouraged and permitted to

develop at a greater FAR. This in turn supports the creation of more jobs and media-related amenities that are easily accessible by growing public transit systems.

The Property is also located near a Major Transit Corridor along Santa Monica Boulevard to the North and shown below in *Figure 4.*

Figure 4



B. ***Restrictions on Restaurant and Retail Uses***

The proposed D Limitation that restricts retail and restaurant uses to the ground floor and individual premises to 20,000 SF does not support the potential needs for future development or the current pandemic situation.

Social distancing and outdoor dining spaces are likely to remain in a post-COVID world. This will require more flexibility in the location and size of such uses within a building. Future tenants may desire spaces that are larger in size and can be shared by multiple tenants with greater infrastructure than for a single tenant (e.g., larger catering or commercial kitchens, physical barriers for additional safety and social distancing). Thus, the Property Owner will be better positioned to make new restaurant and retail storefronts attractive to tenants with fewer restrictions and larger spaces.

Further, having the flexibility to provide open-air commercial uses including outdoor patios and plazas to congregate on mezzanine, upper floors, and/or on the rooftop is not foreign in the

Hollywood community. Many users appreciate the opportunity to meet, work, dine, and lounge on various floors of a building to enjoy the views and immerse in the vibrant culture that Hollywood provides. A more recent example of such an open-floor plan for a studio property is the recently opened Harlow five-story office building at the nearby Sunset Las Palmas Studios which includes a network of terrace decks and exterior staircases.[5] Thus, permitting restaurants and retail uses on different floors of a building would allow Property Owners and future tenants to maximize such open-floor layouts with opportunities for outdoor patios and similar uses throughout a building that can serve both a media-related purpose and provide additional amenities such as restaurant and retail on various floors. This type of flexibility will be even more desirable in a post-COVID environment where users will need to safely socially distance and have the option to do so in open-air, outdoor spaces.

Lastly, the Property is significantly located with a western property line along a rapidly developing and growing Cahuenga Boulevard. Recent development activity along Cahuenga Boulevard is primarily located north of the Property around Hollywood and Sunset Boulevards which are designated as Regional Commercial Center areas in the HCPU2. While the goal and intent of the Property and its surrounding Subareas is more geared towards media-related uses and job creation, providing flexibility in placement of retail and restaurant uses can facilitate the development and activation of much-needed supportive amenities towards the south of Cahuenga Boulevard as well. Cahuenga Boulevard is a critical corridor in the Hollywood community that should be able to support the continued growth of tenants, residents, and visitors with amenities such as restaurants and retail uses within creative layouts that are not overly restrictive. A recent example of such a creative, uniquely designed project on the northern side of Cahuenga Boulevard include the recently proposed 14-story office building with additional commercial uses at 1708 N. Cahuenga.[6]

For these reasons, the City should consider the removal of limitations on restaurant and retail uses that are proposed on the Property.

IV. Conclusion

In conclusion, Epicenter and its affiliate Quixote Studios are longtime members and contributors to Hollywood's growing media-related economy. The Property Owner has actively participated in Hollywood's growth over the last 25 years and remains keenly interested in contributing to the City's desire to preserve media-related uses and jobs particularly on its Property. However, in order to do so, the Property Owner is requesting the City's consideration to permit a greater FAR as well as remove proposed limitations on retail and restaurant uses on the Property. Without incorporating the requested changes, the City could lose a key media-focused parcel that could be further activated to expand and redeveloped to the Property's highest and best use.

---

[5] See Case No. ZA-2011-1682-VCU-SPR-PA1; See also: https://urbanize.city/la/post/new-offices-completed-sunset-las-palmas-studios.

[6] See Case No. CPC-2020-3738-ZCJ-HD-VCU-MCUP-SPP-SPE-RDP; See also: https://beverlypress.com/2020/10/fourteen-story-office-building-planned-for-hollywood/.

We appreciate your time and hope you consider our requested revisions in the final HCPU2.

Very truly yours,

Alfred Fraijo Jr.
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

SMRH:4848-2245-6276.7

cc: Vasco Noya di Lannoy, Epicenter Landcorp LLC

ATTACHMENT A

City of Los Angeles
Department of City Planning

12/16/2020
PARCEL PROFILE REPORT

PROPERTY ADDRESSES
1024 N CAHUENGA BLVD

ZIP CODES
90038

RECENT ACTIVITY
None

CASE NUMBERS
CPC-2016-1450-CPU
CPC-2014-669-CPU
CPC-2007-5866-SN
CPC-2005-6082
CPC-2002-4173
CPC-1997-43-CPU
CPC-1984-1-HD
CPC-18473-B
ORD-182960
ORD-182173-SA40:1B
ORD-176172
ORD-161687
ORD-161116-SA19
PMEX-3260
ENV-2016-1451-EIR
ENV-2014-670-SE
ENV-2005-2158-EIR
ENV-2003-1377-MND
AF-87-2036920-LT

Address/Legal Information	
PIN Number	144B185 863
Lot/Parcel Area (Calculated)	3,652.6 (sq ft)
Thomas Brothers Grid	PAGE 593 - GRID F6
Assessor Parcel No. (APN)	5533016014
Tract	SENECA HEIGHTS
Map Reference	M B 16-72
Block	D
Lot	FR 1
Arb (Lot Cut Reference)	1
Map Sheet	144B185
Jurisdictional Information	
Community Plan Area	Hollywood
Area Planning Commission	Central
Neighborhood Council	Central Hollywood
Council District	CD 13 - Mitch O'Farrell
Census Tract #	1918.10
LADBS District Office	Los Angeles Metro
Planning and Zoning Information	
Special Notes	None
Zoning	MR1-1-SN
Zoning Information (ZI)	ZI-2433 Revised Hollywood Injunction
	ZI-2452 Transit Priority Area in the City of Los Angeles
	ZI-2374 State Enterprise Zone: Los Angeles
	ZI-2331 Sign District: Hollywood Signare (Media District)
General Plan Land Use	Limited Manufacturing
General Plan Note(s)	Yes
Hillside Area (Zoning Code)	No
Specific Plan Area	None
Subarea	None
Special Land Use / Zoning	None
Historic Preservation Review	No
Historic Preservation Overlay Zone	None
Other Historic Designations	None
Other Historic Survey Information	None
Mills Act Contract	None
CDO: Community Design Overlay	None
CPIO: Community Plan Imp. Overlay	None
Subarea	None
CUGU: Clean Up-Green Up	None
HCR: Hillside Construction Regulation	No
NSO: Neighborhood Stabilization Overlay	No
POD: Pedestrian Oriented Districts	None
RFA: Residential Floor Area District	None
RIO: River Implementation Overlay	No
SN: Sign District	Hollywood Signage (Media District)
Streetscape	No

Adaptive Reuse Incentive Area	None
Affordable Housing Linkage Fee	
Residential Market Area	Medium-High
Non-Residential Market Area	High
Transit Oriented Communities (TOC)	Tier 1
RPA: Redevelopment Project Area	None
Central City Parking	No
Downtown Parking	No
Building Line	None
500 Ft School Zone	Active: Vine Street Elementary School Active: Vine Street Early Edutcaion Center
500 Ft Park Zone	Active: Hollywood Recreation Center
Assessor Information	
Assessor Parcel No. (APN)	5533016014
APN Area (Co. Public Works)*	0.637 (ac)
Use Code	3200 - Industrial - Heavy Manufacturing - One Story
Assessed Land Val.	$4,143,613
Assessed Improvement Val.	$428,766
Last Owner Change	07/11/2007
Last Sale Amount	$3,800,038
Tax Rate Area	67
Deed Ref No. (City Clerk)	421189
	1556325,33
Building 1	
Year Built	1951
Building Class	D5A
Number of Units	0
Number of Bedrooms	0
Number of Bathrooms	0
Building Square Footage	3,018.0 (sq ft)
Building 2	No data for building 2
Building 3	No data for building 3
Building 4	No data for building 4
Building 5	No data for building 5
Rent Stabilization Ordinance (RSO)	No [APN: 5533016014]
Additional Information	
Airport Hazard	None
Coastal Zone	None
Farmland	Area Not Mapped
Urban Agriculture Incentive Zone	YES
Very High Fire Hazard Severity Zone	No
Fire District No. 1	No
Flood Zone	Outside Flood Zone
Watercourse	No
Hazardous Waste / Border Zone Properties	No
Methane Hazard Site	None
High Wind Velocity Areas	No
Special Grading Area (BOE Basic Grid Map A-13372)	No
Wells	None
Seismic Hazards	
Active Fault Near-Source Zone	
Nearest Fault (Distance in km)	1.9658076
Nearest Fault (Name)	Hollywood Fault
Region	Transverse Ranges and Los Angeles Basin

Fault Type	B
Slip Rate (mm/year)	1.00000000
Slip Geometry	Left Lateral - Reverse - Oblique
Slip Type	Poorly Constrained
Down Dip Width (km)	14.00000000
Rupture Top	0.00000000
Rupture Bottom	13.00000000
Dip Angle (degrees)	70.00000000
Maximum Magnitude	6.40000000
Alquist-Priolo Fault Zone	No
Landslide	No
Liquefaction	No
Preliminary Fault Rupture Study Area	No
Tsunami Inundation Zone	No
Economic Development Areas	
Business Improvement District	HOLLYWOOD MEDIA DISTRICT
Hubzone	Qualified
Opportunity Zone	Yes
Promise Zone	None
State Enterprise Zone	LOS ANGELES STATE ENTERPRISE ZONE
Housing	
Direct all Inquiries to	Housing+Community Investment Department
Telephone	(866) 557-7368
Website	http://hcidla.lacity.org
Rent Stabilization Ordinance (RSO)	No [APN: 5533016014]
Ellis Act Property	No
AB 1482: Tenant Protection Act	No
Public Safety	
Police Information	
Bureau	West
Division / Station	Hollywood
Reporting District	656
Fire Information	
Bureau	West
Batallion	5
District / Fire Station	27
Red Flag Restricted Parking	No

CASE SUMMARIES

Note: Information for case summaries is retrieved from the Planning Department's Plan Case Tracking System (PCTS) database.

Case Number:	CPC-2016-1450-CPU
Required Action(s):	CPU-COMMUNITY PLAN UPDATE
Project Descriptions(s):	UPDATE TO THE HOLLYWOOD COMMUNITY PLAN
Case Number:	CPC-2014-669-CPU
Required Action(s):	CPU-COMMUNITY PLAN UPDATE
Project Descriptions(s):	COMMUNITY PLAN UPDATE/GENERAL PLAN AMENDMENT
Case Number:	CPC-2007-5866-SN
Required Action(s):	SN-SIGN DISTRICT
Project Descriptions(s):	HOLLYWOOD SIGN SUD AMENDMENT
Case Number:	CPC-2005-6082
Required Action(s):	Data Not Available
Project Descriptions(s):	HOLLYWOOD COMMUNITY PLAN UPDATE
Case Number:	CPC-2002-4173
Required Action(s):	Data Not Available
Project Descriptions(s):	
Case Number:	CPC-1997-43-CPU
Required Action(s):	CPU-COMMUNITY PLAN UPDATE
Project Descriptions(s):	COMMUNITY PLAN UPDATE FOR HOLLYWOOD WHICH IDENTIFIES AND REDEFINES OUTDATED LAND USE ISSUES AND INCONSISTENT ZONING, REVIEWS POLICIES AND PROGRAMS, AS WELL AS REVISING AND UPDATING THE PLAN MAP AND TEXT
Case Number:	CPC-1984-1-HD
Required Action(s):	HD-HEIGHT DISTRICT
Project Descriptions(s):	CHANGE OF HEIGHT DISTRICT WITHIN THE "CORE AREA OF L.A."- GENERAL PLAN ZONE CONSISTENCY PROGRAM.
Case Number:	CPC-18473-B
Required Action(s):	B-PRIVATE STREET MODIFICATIONS (2ND REQUEST)
Project Descriptions(s):	CONTINUATION OF CPC-18473-A. SEE GENERAL COMMENTS FOR CONTINUATION.
Case Number:	ENV-2016-1451-EIR
Required Action(s):	EIR-ENVIRONMENTAL IMPACT REPORT
Project Descriptions(s):	UPDATE TO THE HOLLYWOOD COMMUNITY PLAN
Case Number:	ENV-2014-670-SE
Required Action(s):	SE-STATUTORY EXEMPTIONS
Project Descriptions(s):	COMMUNITY PLAN UPDATE/GENERAL PLAN AMENDMENT
Case Number:	ENV-2005-2158-EIR
Required Action(s):	EIR-ENVIRONMENTAL IMPACT REPORT
Project Descriptions(s):	COMMUNITY PLAN UPDATE FOR HOLLYWOOD WHICH IDENTIFIES AND REDEFINES OUTDATED LAND USE ISSUES AND INCONSISTENT ZONING, REVIEWS POLICIES AND PROGRAMS, AS WELL AS REVISING AND UPDATING THE PLAN MAP AND TEXT
Case Number:	ENV-2003-1377-MND
Required Action(s):	MND-MITIGATED NEGATIVE DECLARATION
Project Descriptions(s):	Approval of a proposed Sign Supplemental Use District pursuant to Section 13.11 of the LAMC for the Hollywood Redevelopment Project Area

DATA NOT AVAILABLE

ORD-182960

ORD-182173-SA40:1B

ORD-176172

ORD-161687

ORD-161116-SA19

PMEX-3260

AF-87-2036920-LT

ZIMAS PUBLIC

Generalized Zoning

12/16/2020

City of Los Angeles
Department of City Planning

Address: 1024 N CAHUENGA BLVD
APN: 5533016014
PIN #: 144B185 863

Tract: SENECA HEIGHTS
Block: D
Lot: FR 1
Arb: 1

Zoning: MR1-1-SN
General Plan: Limited Manufacturing

N
W E
S

LEGEND

GENERALIZED ZONING

- OS, GW
- A, RA
- RE, RS, R1, RU, RZ, RW1
- R2, RD, RMP, RW2, R3, RAS, R4, R5, PVSP
- CR, C1, C1.5, C2, C4, C5, CW, WC, ADP, LASED, CEC, USC, PPSP, MU, NMU
- CM, MR, CCS, UV, UI, UC, M1, M2, LAX, M3, SL, HJ, HR, NI
- P, PB
- PF

GENERAL PLAN LAND USE

LAND USE

RESIDENTIAL

- Minimum Residential
- Very Low / Very Low I Residential
- Very Low II Residential
- Low / Low I Residential
- Low II Residential
- Low Medium / Low Medium I Residential
- Low Medium II Residential
- Medium Residential
- High Medium Residential
- High Density Residential
- Very High Medium Residential

COMMERCIAL

- Limited Commercial
- Limited Commercial - Mixed Medium Residential
- Highway Oriented Commercial
- Highway Oriented and Limited Commercial
- Highway Oriented Commercial - Mixed Medium Residential
- Neighborhood Office Commercial
- Community Commercial
- Community Commercial -Mixed High Residential
- Regional Center Commercial

INDUSTRIAL

- Commercial Manufacturing
- Limited Manufacturing
- Light Manufacturing
- Heavy Manufacturing
- Hybrid Industrial

PARKING

- Parking Buffer

PORT OF LOS ANGELES

- General / Bulk Cargo - Non Hazardous (Industrial / Commercial)
- General / Bulk Cargo - Hazard
- Commercial Fishing
- Recreation and Commercial
- Intermodal Container Transfer Facility Site

LOS ANGELES INTERNATIONAL AIRPORT

- Airport Landside / Airport Landside Support
- Airport Airside
- LAX Airport Northside

OPEN SPACE / PUBLIC FACILITIES

- Open Space
- Public / Open Space
- Public / Quasi-Public Open Space
- Other Public Open Space
- Public Facilities

FRAMEWORK

COMMERCIAL

- Neighborhood Commercial
- General Commercial
- Community Commercial
- Regional Mixed Commercial

INDUSTRIAL

- Limited Industrial
- Light Industrial

CIRCULATION

STREET

- Arterial Mountain Road
- Collector Scenic Street
- Collector Street
- Collector Street (Hillside)
- Collector Street (Modified)
- Collector Street (Proposed)
- Country Road
- Divided Major Highway II
- Divided Secondary Scenic Highway
- Local Scenic Road
- Local Street
- Major Highway (Modified)
- Major Highway I
- Major Highway II
- Major Highway II (Modified)
- Major Scenic Highway
- Major Scenic Highway (Modified)
- Major Scenic Highway II
- Mountain Collector Street
- Park Road
- Parkway
- Principal Major Highway
- Private Street
- Scenic Divided Major Highway II
- Scenic Park
- Scenic Parkway
- Secondary Highway
- Secondary Highway (Modified)
- Secondary Scenic Highway
- Special Collector Street
- Super Major Highway

FREEWAYS

- Freeway
- Interchange
- On-Ramp / Off- Ramp
- Railroad
- Scenic Freeway Highway

MISC. LINES

- Airport Boundary
- Bus Line
- Coastal Zone Boundary
- Coastline Boundary
- Collector Scenic Street (Proposed)
- Commercial Areas
- Commercial Center
- Community Redevelopment Project Area
- Country Road
- DWP Power Lines
- Desirable Open Space
- Detached Single Family House
- Endangered Ridgeline
- Equestrian and/or Hiking Trail
- Hiking Trail
- Historical Preservation
- Horsekeeping Area
- Local Street
- MSA Desirable Open Space
- Major Scenic Controls
- Multi-Purpose Trail
- Natural Resource Reserve
- Park Road
- Park Road (Proposed)
- Quasi-Public
- Rapid Transit Line
- Residential Planned Development
- Scenic Highway (Obsolete)
- Secondary Scenic Controls
- Secondary Scenic Highway (Proposed)
- Site Boundary
- Southern California Edison Power
- Special Study Area
- Specific Plan Area
- Stagecoach Line
- Wildlife Corridor

POINTS OF INTEREST

- Alternative Youth Hostel (Proposed)
- Animal Shelter
- Area Library
- Area Library (Proposed)
- Bridge
- Campground
- Campground (Proposed)
- Cemetery
- HW Church
- City Hall
- Community Center
- Community Library
- Community Library (Proposed Expansion)
- Community Library (Proposed)
- Community Park
- Community Park (Proposed Expansion)
- Community Park (Proposed)
- Community Transit Center
- Convalescent Hospital
- Correctional Facility
- Cultural / Historic Site (Proposed)
- Cultural / Historical Site
- Cultural Arts Center
- DMV DMV Office
- DWP DWP
- DWP Pumping Station
- Equestrian Center
- HQ Fire Department Headquarters
- Fire Station
- Fire Station (Proposed Expansion)
- Fire Station (Proposed)
- Fire Supply & Maintenance
- Fire Training Site
- Fireboat Station
- Health Center / Medical Facility
- Helistop
- Historic Monument
- Historical / Cultural Monument
- Horsekeeping Area
- Horsekeeping Area (Proposed)
- Horticultural Center
- Hospital
- Hospital (Proposed)
- HW House of Worship
- e Important Ecological Area
- e Important Ecological Area (Proposed)
- Interpretive Center (Proposed)
- JC Junior College
- M MTA / Metrolink Station
- M MTA Station
- MTA Stop
- MWD MWD Headquarters
- Maintenance Yard
- Municipal Office Building
- P Municipal Parking lot
- Neighborhood Park
- Neighborhood Park (Proposed Expansion)
- Neighborhood Park (Proposed)
- Oil Collection Center
- P Parking Enforcement
- HQ Police Headquarters
- Police Station
- Police Station (Proposed Expansion)
- Police Station (Proposed)
- Police Training site
- PO Post Office
- Power Distribution Station
- Power Distribution Station (Proposed)
- Power Receiving Station
- Power Receiving Station (Proposed)
- C Private College
- E Private Elementary School
- Private Golf Course
- Private Golf Course (Proposed)
- JH Private Junior High School
- PS Private Pre-School
- Private Recreation & Cultural Facility
- SH Private Senior High School
- SF Private Special School
- E Public Elementary (Proposed Expansion)
- E Public Elementary School
- E Public Elementary School (Proposed)
- Public Golf Course
- Public Golf Course (Proposed)
- Public Housing
- Public Housing (Proposed Expansion)
- JH Public Junior High School
- JH Public Junior High School (Proposed)
- MS Public Middle School
- SH Public Senior High School
- SH Public Senior High School (Proposed)
- Pumping Station
- Pumping Station (Proposed)
- Refuse Collection Center
- Regional Library
- Regional Library (Proposed Expansion)
- Regional Library (Proposed)
- Regional Park
- Regional Park (Proposed)
- RPD Residential Plan Development
- Scenic View Site
- Scenic View Site (Proposed)
- ADM School District Headquarters
- SC School Unspecified Loc/Type (Proposed)
- Skill Center
- SS Social Services
- Special Feature
- Special Recreation (a)
- SF Special School Facility
- SF Special School Facility (Proposed)
- Steam Plant
- sm Surface Mining
- Trail & Assembly Area
- Trail & Assembly Area (Proposed)
- UTL Utility Yard
- Water Tank Reservoir
- Wildlife Migration Corridor
- Wildlife Preserve Gate

SCHOOLS/PARKS WITH 500 FT. BUFFER

- Existing School/Park Site
- Planned School/Park Site
- Inside 500 Ft. Buffer

- Aquatic Facilities
- Beaches
- Child Care Centers
- Dog Parks
- Golf Course
- Historic Sites
- Horticulture/Gardens
- Skate Parks
- Other Facilities
- Park / Recreation Centers
- Parks
- Performing / Visual Arts Centers
- Recreation Centers
- Senior Citizen Centers
- Opportunity School
- Charter School
- Elementary School
- Span School
- Special Education School
- High School
- Middle School
- Early Education Center

COASTAL ZONE

- Coastal Zone Commission Authority
- Calvo Exclusion Area
- Not in Coastal Zone
- Dual Jurisdictional Coastal Zone

TRANSIT ORIENTED COMMUNITIES (TOC)

- Tier 1
- Tier 2
- Tier 3
- Tier 4

Note: TOC Tier designation and map layers are for reference purposes only. Eligible projects shall demonstrate compliance with Tier eligibility standards prior to the issuance of any permits or approvals. As transit service changes, eligible TOC Incentive Areas will be updated.

WAIVER OF DEDICATION OR IMPROVEMENT

- Public Work Approval (PWA)
- Waiver of Dedication or Improvement (WDI)

OTHER SYMBOLS

- Lot Line
- Tract Line
- Lot Cut
- Easement
- Zone Boundary
- Building Line
- Lot Split
- Community Driveway
- Building Outlines 2014
- Building Outlines 2008
- Airport Hazard Zone
- Census Tract
- Coastal Zone
- Council District
- LADBS District Office
- Downtown Parking
- Fault Zone
- Fire District No. 1
- Tract Map
- Parcel Map
- Flood Zone
- Hazardous Waste
- High Wind Zone
- Hillside Grading
- Historic Preservation Overlay Zone
- Specific Plan Area
- Very High Fire Hazard Severity Zone
- Wells

Linda Lou <linda.lou@lacity.org>

Hollywood Community Plan Update Comment Letter: 1350 Western

2 messages

Devon Provo <DProvo@sheppardmullin.com> Wed, Dec 16, 2020 at 3:38 PM
To: "hollywoodplan@lacity.org" <hollywoodplan@lacity.org>, "linda.lou@lacity.org" <linda.lou@lacity.org>
Cc: James Pugh <JPugh@sheppardmullin.com>, Tyler Kramer <tyler.kramer@gemdaleusa.com>

Good afternoon,

Please find the attached comment letter regarding the Hollywood Community Plan Update. If you have any questions about these comments, please contact James Pugh at JPugh@sheppardmullin.com.

Best Regards,

Devon Provo

Devon B. Provo | Associate Planner
+1 213-455-7736 | direct

+1 651-367-4617 | mobile
DProvo@sheppardmullin.com

SheppardMullin
333 South Hope Street, 43rd Floor
Los Angeles, CA 90071-1422
+1 213-620-1780 | main
www.sheppardmullin.com

Gemdale- HCPU2 - Comment Letter and Exhibits, 4826-6810-4404 v 1.pdf
2739K

Linda Lou <linda.lou@lacity.org>
To: Devon Provo <DProvo@sheppardmullin.com>, Hollywood Plan <hollywoodplan@lacity.org>

Hello Devon,

Thank you for your comment letter. It has been received and filed.

Best,

Linda

Linda Lou
Pronouns: She/Her/Hers
City Planner
Los Angeles City Planning
200 N. Spring St., Room 667
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1473
E-NEWS

[Quoted text hidden]

SheppardMullin

Sheppard, Mullin, Richter & Hampton LLP
333 South Hope Street, 43rd Floor
Los Angeles, California 90071-1422
213.620.1780 main
213.620.1398 fax
www.sheppardmullin.com

213.617.4284 direct
jpugh@sheppardmullin.com

December 16, 2020

File Number: 56SW-317659

VIA ELECTRONIC MAIL

Ms. Linda Lou
City Planner
City of Los Angeles
200 N. Spring Street
Room 667, Mail Stop 395
Los Angeles, California
Email: linda.lou@lacity.org

Re: Comments on the Hollywood Community Plan Update (CPC-2016-1450-CPU)

Dear Ms. Lou:

This firm represents Gemdale USA Corporation ("Gemdale") with respect to its property located at 1350-1362 N. Western Avenue, 5433-5499 W. Fernwood Avenue, and 1377 N. Serrano Avenue (the "Property"), in the City of Los Angeles ("City"), as shown on Exhibit 1: Property Location. Gemdale provides the following comments on the draft Hollywood Community Plan Update ("HCPU2") released by the City of Los Angeles ("City") for public review in August 2020.

The existing land use designation and zoning for the Property is Commercial Manufacturing and [Q]CM-1, which allows a maximum floor area ratio ("FAR") of 1.5:1. As shown on Exhibit 2: HCPU2 Land Use Map, Subareas 23 and 25:3 flank the Property to the north and east, respectively. Under the current HCPU2, the City does not assign the Property to a subarea, nor does it propose any changes to its land use designation or zoning. Whereas, Subarea 23 would undergo a change from Highway Commercial to Community Commercial and from (Q)C2-1, C2-1 to [Q]C2-2D. And Subarea 25:3 would change from High Residential to Medium Residential, and from [Q]R4-2 to R3-1XL. The proposed changes to Subareas 23 and 25:3 correspond with an FAR of 3:1.

Because the Property is located within the same City block as Subareas 23 and 25:3, and the surrounding FAR is at or proposed to be 3:1, we respectfully request the City make the following revisions to the HCPU2 to unify the planning and zoning intent across the block:

- **REVISE** the HCPU2 Land Use Map to add the Property as a new subarea ("New Subarea").

- **REVISE** the HCPU2 Land Use Designation and Zone Change Matrix and Hollywood Q & D Regulations to add New Subarea that allows the following:

    - **Subarea:** New Subarea

    - **Existing General Plan Land Use Designation:** Commercial Manufacturing

- **Proposed General Plan Land Use Designation:** Community Commercial
- **Existing Zone:** [Q]CM-1
- **Proposed Zone:** C2-2D[1]
- **Existing FAR:** 1.5:1
- **Proposed FAR:** 3:1
- **Existing Height Limit:** N/A
- **Proposed Height Limit:** N/A
- **CPIO Subarea Type:** N/A
- **CPIO Subarea Letter:** N/A

Currently, the Property's land use designation of Commercial Manufacturing is inconsistent with the surrounding properties designated as Highway Oriented Commercial, as shown in Exhibit 3: Current Land Use Designation Map. Therefore, we suggest that the City update the land use designation and zoning on the Property to permit 3:1 FAR for the following reasons: (1) unify the planning and zoning intent for this City block by extending the Community Commercial land use designation to include the Property and change the zone to facilitate consistent and compatible land uses and allowable FAR within the block, (2) maintain consistency between land uses and zoning in the vicinity, and (3) promote housing and commercial development and job creation within the existing mixed-use environment. As part of the HCPU2, the Highway Oriented Commercial nomenclature is being phased out and updated to Community Commercial; accordingly, we request a Community Commercial land use designation to be consistent with the City's approach.

Thank you for considering this request. Please contact me if you have any questions.

Sincerely,

James E. Pugh
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

Enclosures
cc: Tyler Kramer

[1] The proposed "D" Development Limitation would restrict the maximum FAR to 3:1 to remain consistent with the adjacent Subareas 23 and 25:3. The proposed zoning would not and should not contain the existing Q Condition on the Property.

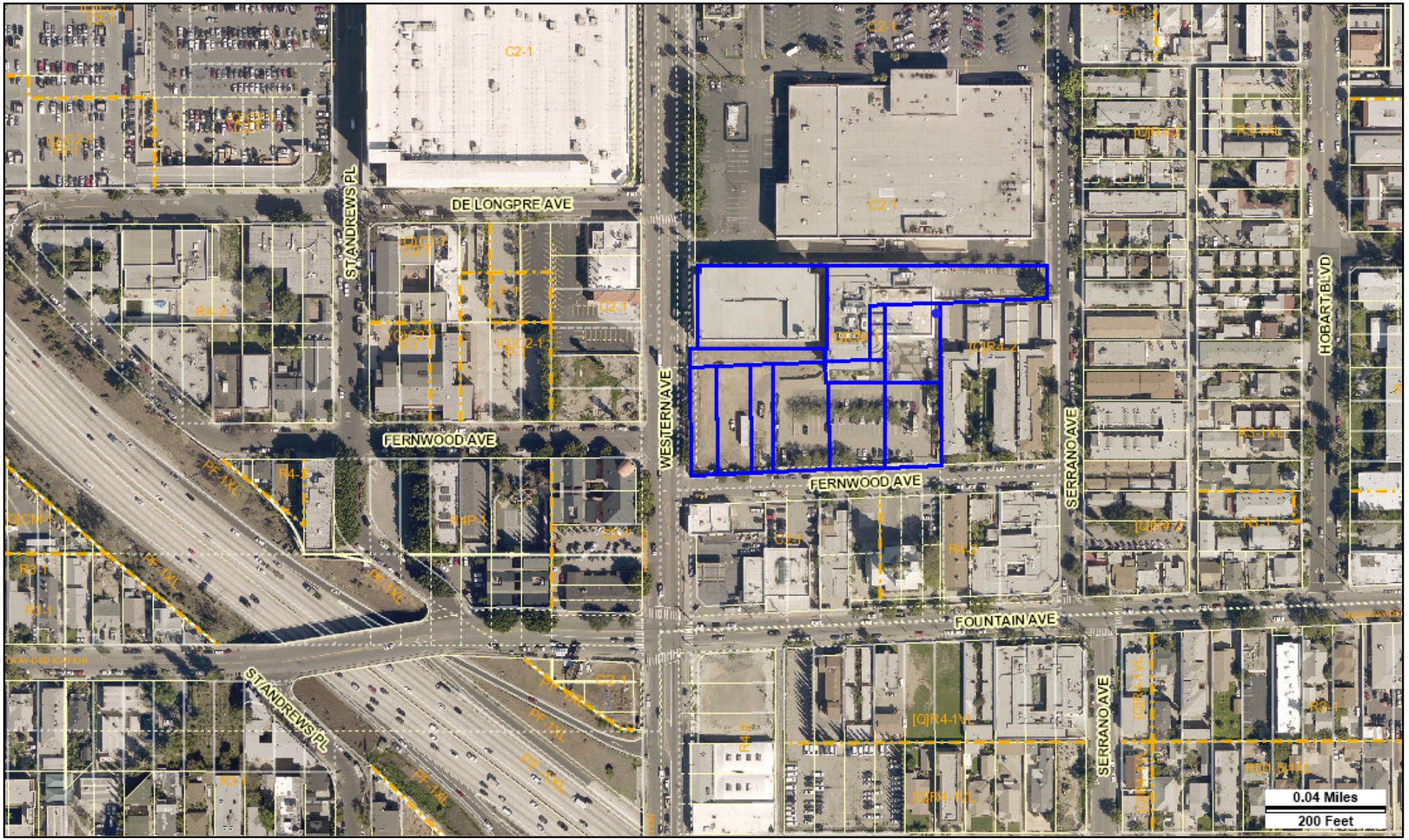
Exhibit 1
Property Location

ZIMAS PUBLIC

LARIAC5 2017 Color-Ortho

12/15/2020

City of Los Angeles
Department of City Planning



Address: 1377 N SERRANO AVE
APN: 5544032020
PIN #: 147A193 171

Tract: P M 2225
Block: None
Lot: FR B
Arb: None

Zoning: [Q]CM-1
General Plan: Commercial Manufacturing

N
W E
S

Exhibit 2
HCPU2 Land Use Map

HCPU2 Land Use Map

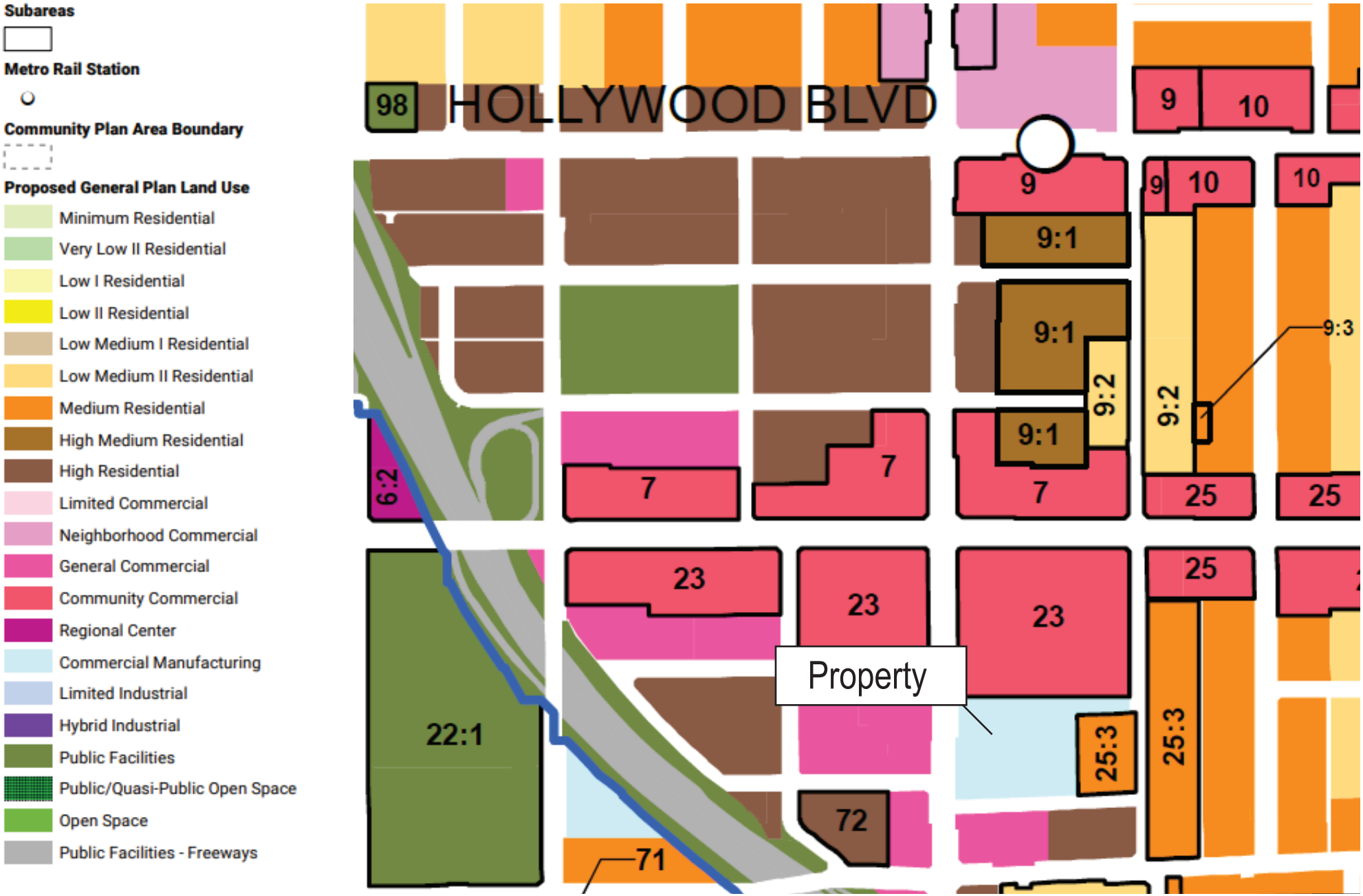


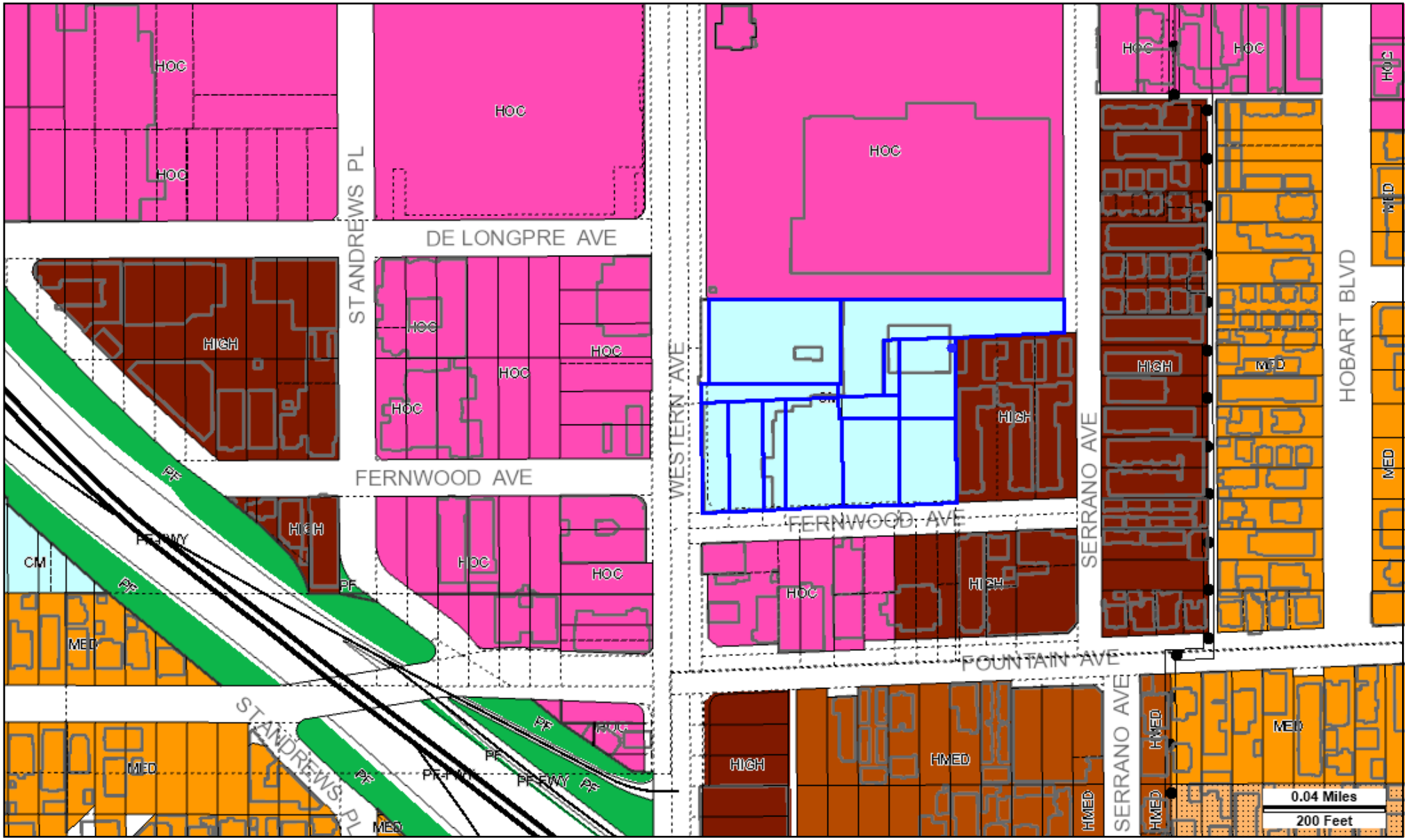
Exhibit 3
Current Land Use Designation Map

ZIMAS PUBLIC

General Plan Land Use

12/15/2020

City of Los Angeles
Department of City Planning



Address: 1377 N SERRANO AVE
APN: 5544032020
PIN #: 147A193 171

Tract: P M 2225
Block: None
Lot: FR B
Arb: None

Zoning: [Q]CM-1
General Plan: Commercial Manufacturing

N
W
E
S

CITY OF LOS ANGELES FOUNDED 1781

Quetzalli Enrique <quetzalli.enrique@lacity.org>

HCPU...Zone Correct/Whitley Ave., Keep All Traffic Lanes,Dangerous Density Bonuses/VHFZ, Upzoning/ Compromises Historic Hollywood,

2 messages

poonsy6603 via Hollywood Plan <hollywoodplan@lacity.org> Wed, Dec 16, 2020 at 4:47 PM
Reply-To: poonsy6603@aol.com
To: "hollywoodplan@lacity.org" <hollywoodplan@lacity.org>

To Whom It May Concern,

I am resubmitting our CONSISTENT ZONING REQUEST for all of WHITLEY AVE.. between Franklin Ave. and Whitley Terrace, from Nov. 16, 2017.

Attached are LETTERS of SUPPORT and I am including other pertinent information since then.

Since this request was submitted in 2017, the 'issue' of Whitley Ave. having never been 'surveyed', mistakenly given THREE different zones, all the groups that reviewed this issue since then, and supported the correction of zoning, including former CD4 Councilmember David Ryu, all agreed that the zone change should be changed from the three zones:
RD3-1XL
RD1.5-1XL
R4-1VL
To ALL ONE consistent zoning of the RD3-1XL, NOT the RD1.5-1XL as originally mentioned in the 2017 letter to Planning below.

There are a number of other issues for the HCPU addressed below, after the Whitley Ave. Zoning issue.

Thank you,
Jim & Ann Geoghan (Annie Gagen)
30+ year residents of Whitley Heights
Former WHCA board members
Former HHWNC board members
CD4

Zoning Change Request to Planning Dept..2017

On Nov 16, 2017, at 9:45 AM, Conni Pallini <conni.pallini-tipton@lacity.org> wrote:

Thank you Mr. and Mrs. Geoghan,

Your correspondence has been received and we will evaluate your suggestions in relation to the Hollywood Community Plan update.

Sincerley,
Conni

Conni Pallini-Tipton, AICP
Senior City Planner, Policy Planning
Department of City Planning
T: (213) 978-1179 | **F:** (213) 978-1477
200 N. Spring St., Room 667
Los Angeles, CA. 90012
planning.lacity.org

On Wed, Nov 15, 2017 at 8:53 PM, <poonsy6603@aol.com> wrote:

To Whom it May Concern,

Subject: Change from (Q) R4 -1VL to (Q) RD3-1XL or (Q)RD 1.5-1XL Whitley Ave. and Grace Ave.

Whitley Ave north of Franklin should have a zone change in the HCP2.

We are concerned, since the Whitley Heights HPOZ ADJACENT streets, Whitley Ave. and Grace Ave. north of Franklin, since never 'surveyed', seem to be designated incorrectly.

Since the State Geologist recently confirmed the Active EQ Fault Line, and these streets are in the Alquist Priolo Fault Zone, they should be RE-zoned to dis-allow the density allowed now.

Currently the multi family Adjacents to Whitley Heights HPOZ have 3 different zones.

RD3-1XL
RD 1.5-1XL
(Q) R4-1VL

There should be a change for the multi family from (Q)R4-1VL to R3-1XL or RD-1.5XL ....

There should be Restricted Development (a 30 foot height limit) ... Lower Density and Height.

(A Whitley Ave. TOC was given a 70 or 75% density bonus here where only a 30 or 35% is allowed due to the VERY HIGH FIRE SEVERITY ZONE....more on this below)

This obviously was an oversight since Whitley Ave. is a very very steep Hillside (Area Zone).
Fire tucks have trouble making it up to the top of the hill.

We know this, since we are right at the top of the hill, and have witnessed this scenerio first hand many times.
They also have very little space to turn around once they reach the top of Whitley Ave. to try and get back down the hill.

There are other narrow, steep hillside streets, that are Whitley Heights Historic District 'HPOZ Adjacent' streets and according to Zimas, Whitley Ave. is a:

Hillside Area Zone
Very High Fire Severity Zone
Alquist Priolo EQ Fault Zone
Special Grading Zone
Freeway Adjacent Advisory Notice for Sensitive Uses

Projects on these narrow and very steep hillside streets should require EIR's.

We also recommend setback reductions be DIS-allowed due to the importance of emergency vehicle access in this Very High Fire Severity HILLSIDE Zone..

Thank you for your attention,

Jim & Ann Geoghan
Whitley Heights
CD4

BACKGROUND...

Hollywood Heritage's Whitley Ave. Conservation Project proposal of correcting the incorrect three different zones on Whitley Ave.to the RD3-1XL zone at the top of Whitley Ave. should be included in the new Hollywood Community Plan Update,
as supported by Hollywood Hills West Neighborhood Council (letter attached) and Whitley Heights Civic Association.

Having determined the current Whitley Ave. zoning is incompatible, Hollywood Heritage drafted a proposal for inclusion in the new Hollywood Community Plan for downzoning of Whitley Ave. which is only one northbound and southbound lane, part of the original Whitley Heights Historic District.

The Whitley Heights HPOZ at Whitley Terrace, at the top of Whitley Ave. is the only area Whitley Ave. goes to, going north..

Whitley Ave. is the main access street in and out of the Whitley Heights HPOZ, the main emergency exit access , and

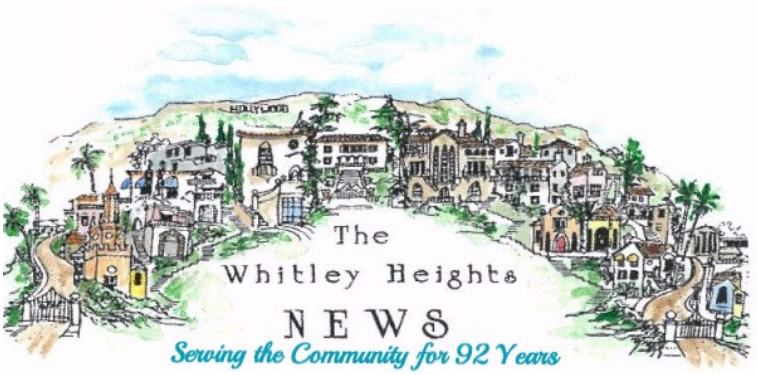
Hollywood Heritage's Whitley Ave. Conservation Project proposal was presented, discussed, and motions to support voted on and passed at:

1) Hollywood Hills West Neighborhood Council Area 3, 4, & Housing Joint Committee Meeting....Feb. 13, 2018
Agenda:
http://www.hhwnc.org/wp-content/uploads/2018/02/Agenda-HHWNC-Area-3-Area-4-Housing-Committees-021318.pdf
Consideration of Hollywood Heritage's proposal to downzone.....
Motion Passed

2) Whitley Heights Civic Association board meeting....Feb. 20, 2018
Motion to support passed

3) Hollywood Hills West Neighborhood Council board meeting....Feb. 21, 2018
Agenda:
http://www.hhwnc.org/wp-content/uploads/2018/02/HHWNC-February-2018-Board-Agenda-Draft.pdf
Motion:
That the HHWNC Board adopt Area 3 / Area 4 / Housing Committees' recommendation to support Hollywood Heritage's proposal to downzone 10 properties with construction dates from 1919 to 1928 to match the adjacent Whitley Heights Preservation Overlay Zone Historic District zoning.
Motion Passed

Motion:
That the HCPU2 Ad Hoc Committee of the HHWNC Board approve possible inclusion of Area 3 / Area 4 / Housing motion to support Hollywood Heritage in downzoning 10 building parcels to match adjacent Whitley Heights Preservation Overlay Zone zoning; •
Motion Passed



FROM WHITLEY HEIGHTS
NEWSLETTER
Photo of Historic Whitley Ave.Hill
Used in many photo shoots and Hollywood
movies ..The Way We Were, The Day of
the Locust, among others.

Hollywood Heritage Conservation Project

Hollywood Heritage received outreach from neighborhood stakeholders to investigate the zoning for 10 original Hollywood Grand View tract parcels (building construction dates ranging from 1919 - 1928). Having determined the zoning is incompatible, Hollywood Heritage drafted a proposal for inclusion in the new Hollywood Community Plan to match the zoning of the Whitley Heights Historic District.

In support of Hollywood Heritage's proposal, Anastasia Mann, Hollywood Hills West NC President (HHWNC), wrote the following letter to Councilmember Ryu.
Click here to read.

CD4 follow up correspondence (edited)....

It was a pleasure to meet you all, I look forward to working together!

DAVID RYU
L.A. CITY COUNCILMEMBER

Emma G. Howard
Senior Planning Deputy
Office: (213) 473-7004
www.davidryu.lacity.org

On Tue, Apr 24, 2018 at 1:44 PM, <poonsy6603@aol.com> wrote:

> Dear Councilmember Ryu and Staff,
>
> Thank you so much for taking time to meet with us for a presentation of the 'Hollywood Heritage - Whitley Ave. Conservation Proposal'.
>
> The discussion that followed was very helpful, the issues were clearly understood, and many possible solutions were addressed.
>
> Included here are recaps of the issues.
>
> RECAP:
>
> While not included in the Whitley Heights HPOZ, Hollywood Heritage has determined that 10 parcels on Whitley Ave., the very steep hill north of Franklin Ave., and main entryway into the Whitley Heights HPOZ, are 'Historic District Contributors'.
>
> These are affordable and RSO buildings...some 100 years old.
>
> A 'Multi-Family Residences Historic District' was identified on Whitley Ave. South of Franklin Ave...
>
> However, the 'Multi-Family Residences', on Whitley Ave. North of Franklin Ave., which are older, and 'National Register Historic District - Whitley Heights HPOZ adjacent', have not been surveyed by the CRA or the City..
>
> Since it was never surveyed, Whitley Ave., North of Franklin Ave. is a 'smorgasbord' of Three Zones (see map attachment).
>
> The Hollywood Heritage - Whitley Ave. downzone proposal requests:
>
> 1) Downzoning 'Whitley Heights HPOZ Adjacent' Whitley Ave. 'Historic Contributor' zoning, be brought into more compatibility with the Whitley Heights HPOZ zoning to implement protections of the 'Historic District Contributors'
>
> 2) Implementation of an 'Interim Control Ordinance (ICO)' to protect the identified parcels and allow proper analysis.
>
> 3) 'HPOZ compatible' zone change for Whitley Ave. be included in the Hollywood Community Plan Update.

The current trio of zones for Whitley Ave. from... #1 - North to #3 - South Whitley Ave.....

#1 North being closest to Whitley Terrace, Whitley Heights HPOZ are:

1) RD 3 - 1XL..Top of Whitley Ave. Hill..near Whitley Terrace.. WH HPOZ
2) RD 1.5 - 1XL....Middle of Whitley Ave Hill....Emmet Terrace part of the WH HPOZ intersects
3) R4 - 1VL...Bottom of Whitley Ave. Hill....The same zone as neighboring Wilcox and Cahuenga Aves., not hillside zones, or high fire severity zones, and a much heavier used street with many more lanes and 101 freeway access.

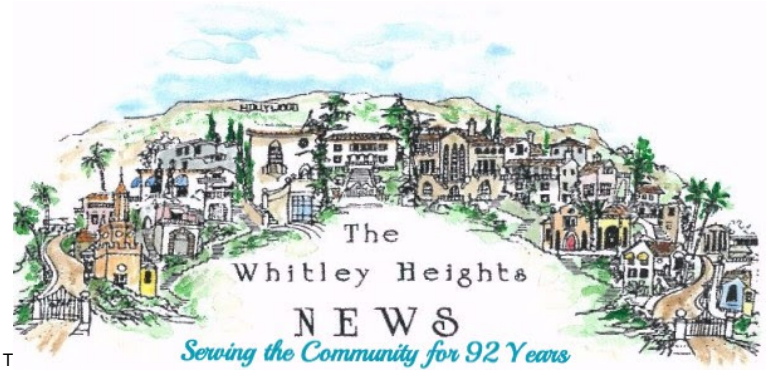
Whitley Ave. is a very steep hill and the main entryway and emergency access to and from the Whitley Heights HPOZ.

Whitley Heights HPOZ is at the top of Whitley Ave. at Whitley Terrace, and also, on the way up Whitley Ave., the intersecting streets to Whitley Ave., between Franklin Ave. and Whitley Terrace, Padre Terrace and Emmett Terrace are part of the Whitley Heights HPOZ

Whitley Ave. is a:
Hillside Area Zone
High Fire Severity Zone
Special Grading Zone
Alquist Priolo Zone
Freeway Adjacent Advisory Notice for Sensitive Uses Zone

Hollywood Hills West Neighborhood Council voted to support Hollywood Heritage proposal and also consideration to include change request in the Hollywood Community Plan Update letter they will send to the city. (see history below)

Whitley Heights Civic Association also voted to support Hollywood Heritage's proposal and shared with the community, HHWNC's letter of support to Councilmember David Ryu, in The Whitley Heights News.



T

Click to HHWNC letter of support to Councilmember David Ryu

Hollywood Heritage Conservation Project

Hollywood Heritage received outreach from neighborhood stakeholders to investigate the zoning for 10 original Hollywood Grand View tract parcels (building construction dates ranging from 1919 - 1928). Having determined the zoning is incompatible,

Hollywood Heritage drafted a proposal for inclusion in the new Hollywood Community Plan to match the zoning of the Whitley Heights Historic District.

In support of Hollywood Heritage's proposal, Anastasia Mann, Hollywood Hills West NC President (HHWNC), wrote the following letter to Councilmember Ryu.
Click here to read.

Thank you,
Whitley Ave. Conservation Team

Additional Comments for the HCPU:

Another issue that we would like addressed and remedied..for PUBLIC SAFETY sake...

Whitley Ave. is a VERY HIGH FIRE SEVERITY ZONE..

A Whitley Ave. TOC, 1920 N. Whitley Ave., was given a 70% or 75% density bonus where only a 30% or 35% density is allowed due to the VERY HIGH FIRE SEVERITY ZONE.

Former Councilmember Ryu, after he learned that JJJ voters NEVER VOTED FOR THAT KIND OF DENSITY BONUS,
was appalled about this and promised the Whitley Heights community at a Town Hall, he would never allow that to happen here again.
However, unfortunately, he has not been re-elected.

We believe it is imperative that the city stop giving such huge, dangerous UNALLOWED density to any project,
TOC or other projects, in our VERY HIGH FIRE SEVERITY ZONE, also recently mapped out by State Geologist as in the Alquist Priolo EQ Fault Zone..AND according to Zimas, it is a Special Grading Zone and (a VERY steep) Hillside Zone

TRAFFIC....

We are OPPOSED to elimination of ANY traffic lanes in this heavy traffic, many times gridlocked area, with many new, larger, more dense developments, bringing many more cars, with movie premieres, Hollywood Bowl, John Anson Ford, traffic and street closures...

With the additional UPZONING the city wants in the HCPU for this area, the very thought of eliminating ANY traffic lanes would be CATASTROPHIC.

PRESERVATION...Historic Hollywood

We feel it's very important that Planning works closely with our Preservation Orgs....Hollywood Heritage and LA Conservancy, with our Neighborhood Councils and our Hollywood Communities and Community groups, when making development decisions in our area, especially with regards to our Hollywood Historic resources..

We reside near the Historic part of Hollywood Blvd. and are worried about all the current UPZONING in the HCPU with regards to compromising the Historic buildings in the area, and the National Register of Famous Places that Hollywood Blvd. is, and not easy to get that designation, and it is our understanding, it could be lost if enough historic buildings are compromised, disrespected, neglected, boarded up, or ultimately forever lost to 'demo by neglect'...

It's very difficult to believe that with all the UPZONING in the HCPU of the Historic Hollywood area, that the history and historic buildings will not be compromised, or in danger of being lost.

We appreciate Planning reassuring us that new projects will be 'in context' and respectful to the Historic architecture and the Historic Resources but it is difficult to have confidence in that since new projects going up all over the area are not respectful to Historic Hollywood or 'in context' at all.

There should NOT be UPZONING anywhere near Historic Hollywood Blvd, the Historic Landmarks, or Historic Resources and our Preservation Orgs, Neighborhood Councils, and Communities should always be included with any developments in the Historic part of Hollywood. ..

There should NOT be upzoned, oversized projects near or behind the Historic Landmark buildings on Hollywood Blvd. or skyscrapers towering over, or blocking Historic iconic Historic Cultural Monuments like The Capitol Records Building, for these overshadow, compromise, block, and endanger the Historic buildings and Historic Resources of Hollywood..

Thank you for all your hard work on the HCPU and for the opportunity for us to weigh in ..
We hope you will seriously consider our requests and concerns...
.
Jim & Ann Geoghan
Whitley Heights

8 attachments

B - CM Ryu meeting - downzone proposal.pdf
214K

D - MAPS (Vr.2) -Proposed Whitley Heights Downzoning - HHWNC approved.pdf
401K

HHWNC support -Hollywood Heritage's proposal - downzone 10 parcels of Ocean View Tract.pdf
285K

Proposal - downzone.pdf
148K

A13 - HHWNC - Housing Chair - letter to CM Ryu.pdf
217K

A14 - LATU - David Ryu letter.pdf
2939K

A15 -Hollywood Heights Association - letter to CM Ryu.pdf
283K

A8 - HPOZ Extension - proposal vr.2.pdf
400K

Linda Lou <linda.lou@lacity.org>
To: poonsy6603@aol.com
Cc: "hollywoodplan@lacity.org" <hollywoodplan@lacity.org>

Hello Jim and Ann,

Thank you for your email and attachments. They have been received and filed.

Best,

Linda

Linda Lou
Pronouns: She/Her/Hers
City Planner
Los Angeles City Planning
200 N. Spring St., Room 667
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1473
E-NEWS

[Quoted text hidden]

Monday April 16, 2018

Honorable Councilmember David Ryu; Council Office, Fourth District

Re: **WHITLEY HEIGHTS downzone proposal** – presented by HHWNC Stakeholders + Hollywood Heritage, Inc.

AGENDA

Objectives:

a. Immediate implementation of **Interim Control Ordinance** (ICO) to protect 13 identified parcels and allow proper analysis.
b. Evaluation of parcels as Historic District Contributors and appropriate, compatible Zoning.
c. Implementation of protections and downzoning via **HCPU-2** inclusion.

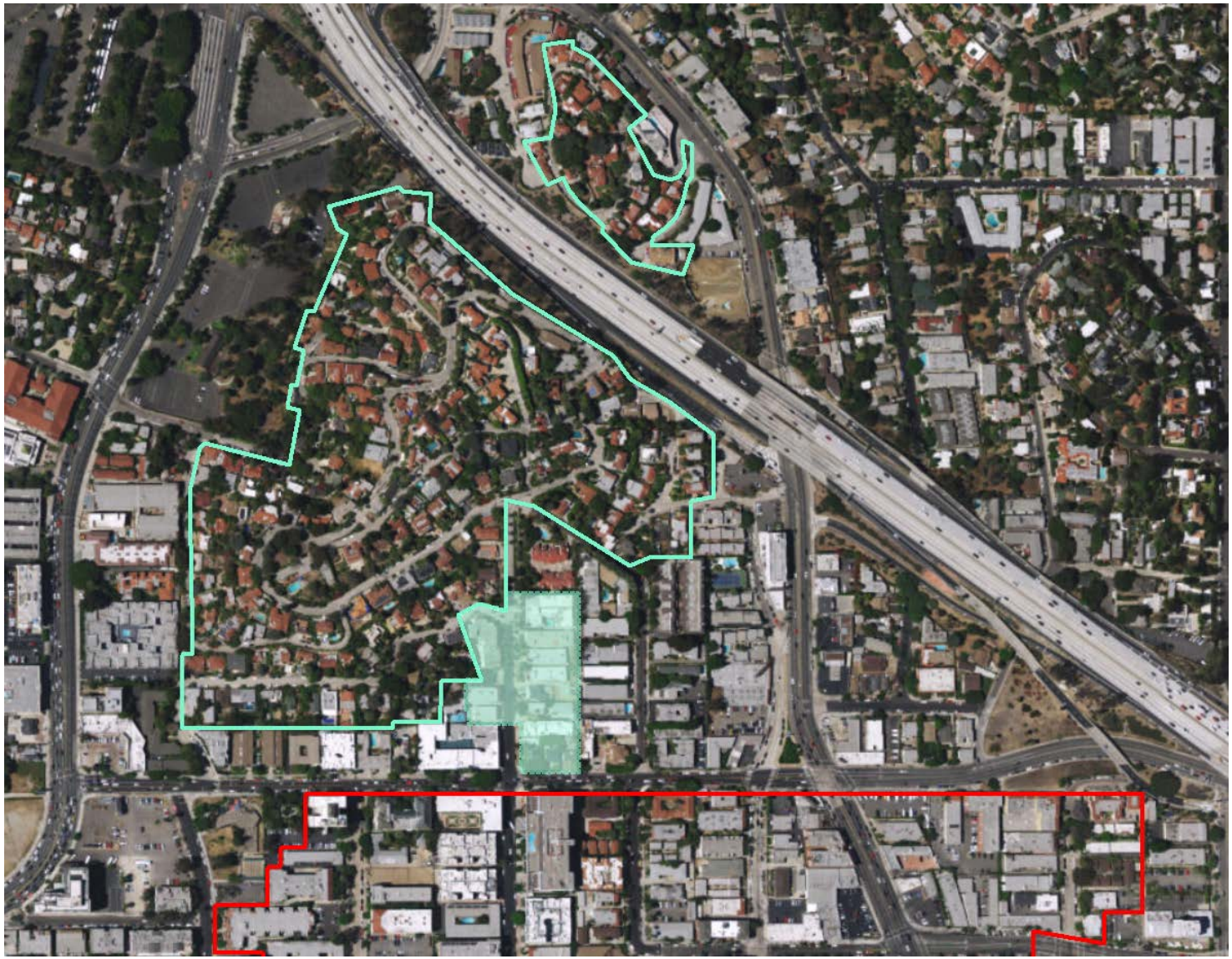
1. The parcels are immediately adjacent to **National Register Historic District** Whitley Heights.

2. The parcels are immediately adjacent to **Historic Preservation Overlay Zone** Whitley Heights.

3. Neighborhood Conservation: the historic streetscape remains intact. **Streetscape retains strong integrity**.
   a. Allowing new development without providing Alternatives, Historic Survey & analysis sets a negative precedent for this streetscape with strong integrity.
   b. Traffic, Parking, Intersection rated F; SAFETY (Whitley Ave/Franklin only 1 of 2 points of emergency exit for Whitley Heights); Special grading zone; Hillside zone; High Fire Severity zone; Alquist priolo zone; Freeway sensitive zone;…

4. Historic development patterns direct new construction to the rear of parcels.
   a. HHWNC success with Historic-Cultural Monument 1905 Grace project – new construction S.L.S. on rear of a HCM parcel.
   b. Adjacent historic Multi-Family parcels along Whitley Ave have developed the rear of their parcels, allowing the addition of density.
   c. A Small Lot Subdivision in the rear of 'historic' parcels is most compatible to the surrounding environs.

Whitley Heights Downzoning Proposal

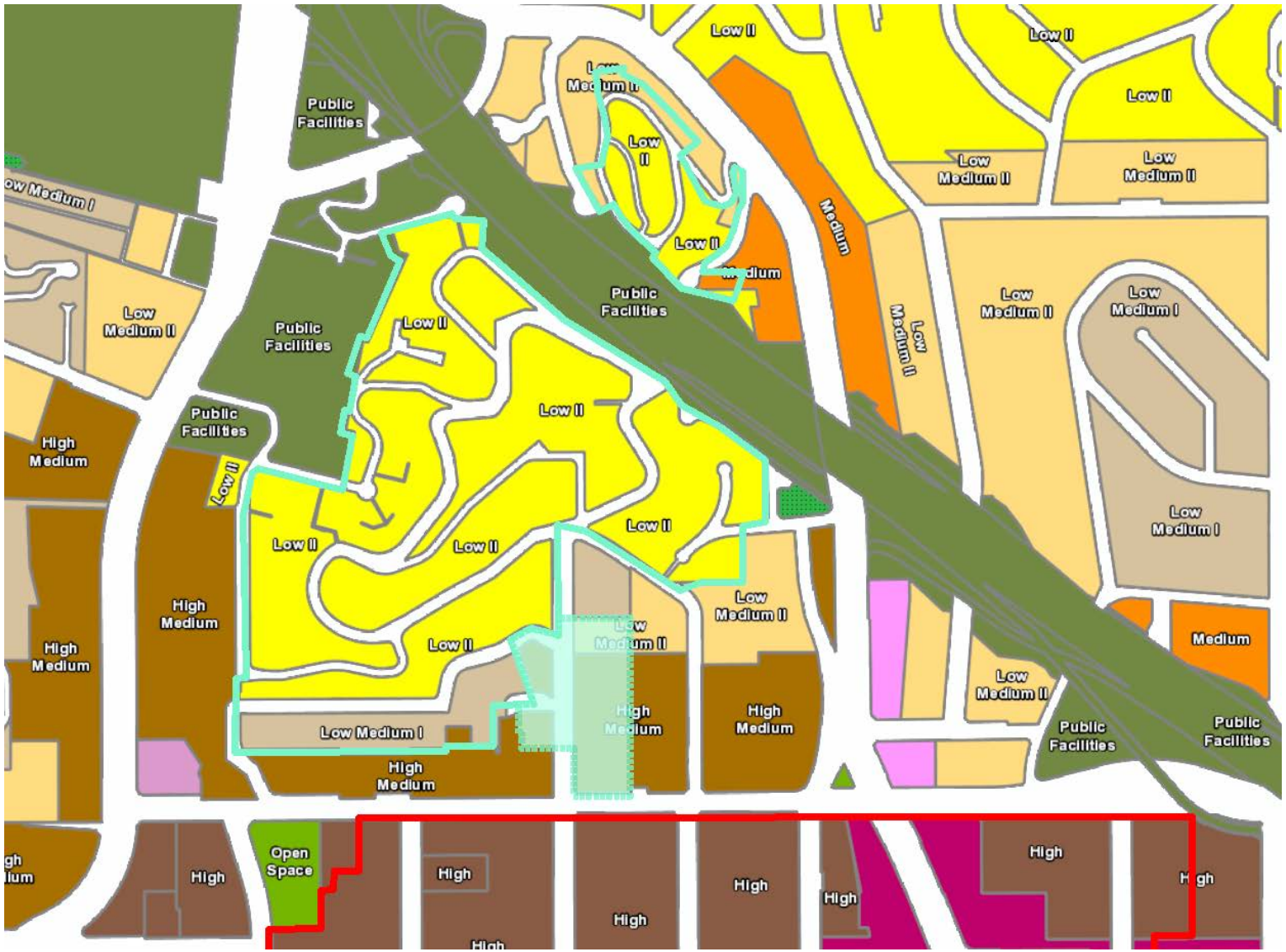


Whitley Heights HPOZ

Whitley Heights HPOZ – Proposed Extension

Hollywood North Multi-family Residential Potential Historic District

Whitley Heights Downzoning Proposal



Whitley Heights HPOZ

Whitley Heights HPOZ – Proposed Extension

Hollywood North Multi-family Residential Potential Historic District

HOLLYWOOD HILLS WEST
NEIGHBORHOOD COUNCIL

February 26, 2018

Councilmember David Ryu
Los Angeles City Hall
200 N. Spring Street, Room 425
Los Angeles, CA 90012

Re: Support of Hollywood Heritage's request to downzone 10 parcels of Ocean View Tract

Dear Councilmember Ryu,

The Board of the Hollywood Hills West Neighborhood Council (HHWNC) met on Wednesday, February 21, 2018, during which time the Board considered the above referenced item. The following motion was put forward and passed by the Board (17 yes, 1 no.)

> **Motion:** That the HHWNC Board adopt Area 3 / Area 4 / Housing Committees' recommendation to support Hollywood Heritage's proposal to downzone 10 properties with construction dates from 1 919 to 1928 to match the adjacent Whitley Heights Preservation Overlay Zone historic district zoning.

Please attach this letter with motion of support into any files you deem appropriate.

Thank you.

Sincerely,

Anastasia Mann

cc: John Girodo, Hollywood Heritage jgirodo@gmail.com
Renee Weitizer renee.weitzer@lacity.org
Sarah Dusseault sarah.dusseault@lacity.org
Alice Roth alice.roth@lacity.org

7095 Hollywood Blvd. Box 1004
Los Angeles, California 90028-8911

Proposal:
(Attached are three maps generated to illustrate; *Hollywood Heritage's proposal to down-zone ten identified properties (construction dates **1919** to **1928**) to **match** the adjacent Whitley Heights HPOZ / National Register Historic District zoning.*

==========
Here are the building vintages for the ten potential historic resources proposed for down-zoning:

1929-1933 Whitley Ave (Ojai Apartments, HCM #842): 1928
1921 Whitley Ave: 1925
1907 Whitley Ave: 1924
6561 Franklin Ave: 1919
6555 Franklin Ave: 1919
6551 Franklin Ave: 1919
1916-1918 Whitley Ave: 1921
1920-1924 Whitley Ave: 1921
1926 Whitley Ave: 1923
1930 Whitley Ave: 1923
==========

-----Original Message-----
From: Luminita Roman <housingchair@hhwnc.org>
To: David Ryu <david.ryu@lacity.org>; Matthew Glesne <matthew.glesne@lacity.org>
Cc: Brian Dyer <area3chair@hhwnc.org>; Orrin Feldman <vicepresident@hhwnc.org>; Anastasia Mann <president@hhwnc.org>
Sent: Mon, Aug 27, 2018 11:48 pm
Subject: 1920 Whitley Ave

Dear Councilman Ryu,

Since I know how passionate you are in preserving the historic properties in our city, I hope that the Bob Hope's house did not made you lose your "nerve" as there is a saying: you get knocked down a horse you get right back on it. So is the extremely important historic preservation of our communities aside from some specific properties.

I was baffled to find out that the proposed project at 1920 Whitley Ave is now a go without any input from the neighborhood. Is my understanding that they claimed the TOC part of the prop JJJ and now they believe they are entitled to demolish the beautiful apartment structure from which they already evicted most of their rent control tenants, in order to heap a 67 feet 6 stories structure to replace it.

First, I was under the impression that the entire Whitley Heights north of Franklin will be down zoned to better fit within the historic structures. I remembered sitting on at least two NC meetings when we supported that the area be re-zoned.

Second, the Hollywood redevelopment Plan has not been approved yet and there are still debates ongoing what Transit Oriented Communities actually mean for the residents not only for the developers. In a meeting with Mathew Glesne, he assured bot myself and Brian Dyer, the area 3 chair for the HHWNC, that the communities will have an impact as to how tall can something be built and where. Now, I feel sick to my stomach to see that this developer has been able to achieve its goal of hyper-construction in a Fire Prone area without the requirement from the City to conduct an outreach to the HHWNC and to the neighbors. For this reason alone, this project should be halted in its track and a requirement to come back to HHWNC should be a must.

Lastly, in the light of the ongoing efforts of the down-zoning that entire area of Whitley heights , any and all projects should be placed on hold until the zoning issue is resolved first. After the zoning issue is resolved first, then a look at how the TOC fits in it must be undertaken. All this take a lot of time and the expedited process done before closed door stinks to high heaven.

Therefore, we need your help. If anybody could do it that is you!!!!
Please advise accordingly.

Luminita Roman
Housing Chair for HHWNC

To:
Councilmember Ryu
Renee.weitzer@lacity.org
alice.roth@lacity.org
emma.howard@lacity.org
nicholas.greif@alcity.org
sarah.dusseault@lacity.org
rachel.fox@lacity.org

From:
The Los Angeles Tenants Union
Hollywood Local
c/o Susan Hunter
6500 Sunset Blvd.
Los Angeles, CA 90028

RE: 1920 Whitley Avenue/ADM-2018-662-TOC

Councilman Ryu,

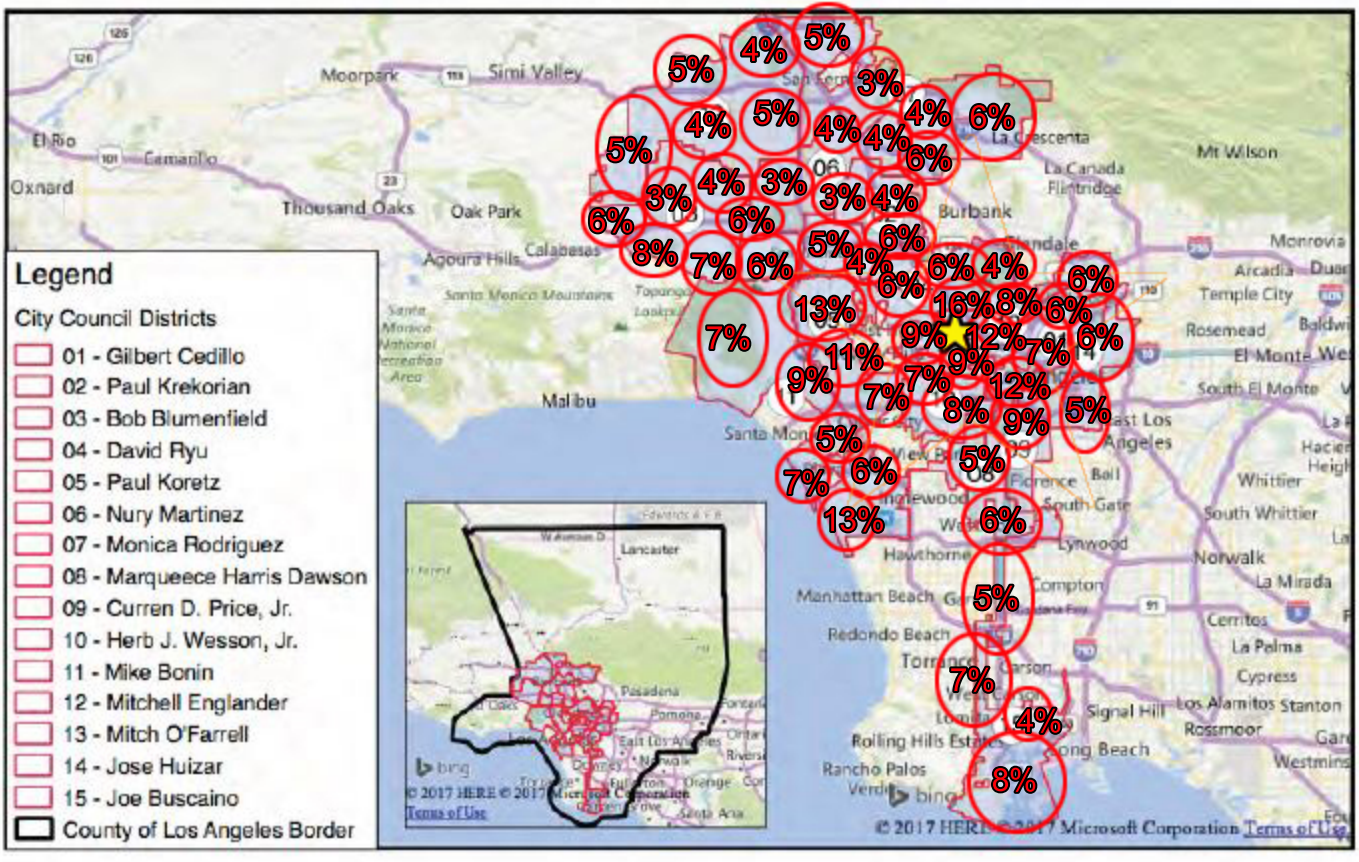
It has come to the attention that more RSO housing is endangered in the Hollywood area. More buildings are threatened with demolition and new construction of yet more market rate housing. Our local compromised of 200 members and friends have organized to push back against this type of displacement. We took a unanimous vote to support UN4LA and their appeal against the proposed TOD project for this location. Quite frankly councilman, we are tired of seeing our neighbors thrown out of their homes and market rate units sitting empty in their place.

We can no longer pretend that transit-oriented communities work. We also have to stop ignoring the link between the push for transit-oriented development and homelessness. If we are going to get serious about our homeless crisis, we have to stop ignoring the root cause. We have lost over 22,000 RSO units while our homeless in the city have increased to over 30,000 in the same time frame. Our communities have been gutted while our ridership on Metro is down across the board, so what exactly is all of this sacrifice for?

Our vacancy rates are now soaring to 12%-16% in Hollywood. There is no reason to continue to push more people out of their homes for a system we hope will eventually work. That isn't real planning. I hope that you and your staff will do the right thing and put the needs of the citizens over the needs of the private developers. We can't continue to make bad decisions in the hopes that someday it will work out. I have attached a map showing the vacancy rates across the city from data pulled from the Census website.

Thank you for your time,
Los Angeles Tenants Union - Hollywood Local

City of Los Angeles Council Districts



-----Original Message-----
From: Fredrica Cooper <writericki@aol.com>
To: councilmember.ryu <councilmember.ryu@lacity.org>
Cc: renee.weitzer@lacity.org <Renee.weitzer@lacity.org>; alice.roth <alice.roth@lacity.org>; emma.howard <emma.howard@lacity.org>; nicholas.greif <nicholas.greif@alcity.org>; Sarah Dusseault <sarah.dusseault@lacity.org>; rachel.fox <rachel.fox@lacity.org>; Annie Gagen <poonsy6603@aol.com>
Sent: Mon, Aug 27, 2018 5:39 pm
Subject: A PROTEST RE: 1920 WHITLEY AVE.

Dear Council Member Ryu,

I wish to protest the demolition of 1920 Whitley Ave., in the original 'historic district' of Whitley Heights.

The proposed 67-foot-tall, out of scale and character building in it's place, is in the Whitley Heights HPOZ; a HILLSIDE ZONE, a HIGH FIRE SEVERITY ZONE, and a distinctive, residential street of four-story buildings.

The building as planned, will be a blight on this historic zone, and could spell the future disintegration of the neighborhood's quality, preservation and property values.

Your intervention is crucial.
Thank You,

fredrica cooper
treasurer & board member
hollywood heights association

Proposal:

(Attached are maps generated to illustrate) Hollywood Heritage's proposal to 'down-zone' 13 identified parcels* (10 parcels identified as potential Historic District Contributors, with construction dates **1919** to **1928**) to match the adjacent Whitley Heights HPOZ / National Register Historic District per HPOZ Extension.

*13 parcels identified; 10 potential Historic Contributors, 3 non-Contributors (construction dates post 1960).

==========

Construction dates for the ten potential historic resources proposed for 'down-zoning':

1929-1933 Whitley Ave (Ojai Apartments, HCM #842): **1928**

1921 Whitley Ave: **1925**

1907 Whitley Ave: **1924**

6561 Franklin Ave: **1919**

6555 Franklin Ave: **1919**

6551 Franklin Ave: **1919**

1916-1918 Whitley Ave: **1921**

1920-1924 Whitley Ave: **1921**

1926 Whitley Ave: **1923**

1930 Whitley Ave: **1923**

---

three non-contributing parcels:

1. 1912 Whitley: original structure from 1921 demolished, new building in 1987
2. 1936 Whitley: original structure from 1914 demolished, new building in 1965
3. 1944 Whitley: original structure from 1919 demolished, new building in 1964

Sophia Kim <sophia.kim@lacity.org>

Comment Letter re Hollywood Community Plan

Sophia Kim <sophia.kim@lacity.org> Thu, Dec 17, 2020 at 8:14 AM
To: Jamie Hall <jamie@lclandtrust.org>
Cc: Hollywood Community Plan <hollywoodplan@lacity.org>

Hello Jamie,

Thank you for your comment letter. It has received and filed.

On Wed, Dec 16, 2020 at 8:50 PM Jamie Hall <jamie@lclandtrust.org> wrote:

> Please find our comment letter.
>
> Regards,
>
> Jamie T. Hall
> **Laurel Canyon Land Trust**
> President
> (323) 709-9600 work
> (512) 619-4645 cell
> www.lclandtrust.org
>
> *LCLT is a public benefit 501(c)(3) corporation.*

--

Sophia Kim
City Planning Associate
Los Angeles City Planning

200 N. Spring St.
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1208

LAUREL CANYON
LAND TRUST

A Non-Profit Organization Dedicated to Preserving Open Space in Laurel Canyon

December 16, 2020

VIA EMAIL: hollywoodplan@lacity.org

Los Angeles City Planning
200 N. Spring Street, Room 667
Los Angeles, California 90012

Re: Comments on the Hollywood Community Plan Update, City EIR No. ENV-2016-1451- EIR, CPC-2016-1450-CPU, State Clearinghouse No. 2016041093

Dear Hearing Officer:

I am writing on behalf of the Laurel Canyon Land Trust (LCLT), a non-profit organization established for the purpose of conserving undeveloped land in Laurel Canyon, California. LCLT is the partner organization of the Laurel Canyon Association ("LCA"), a long-standing neighborhood association in Laurel Canyon and is the outgrowth of the open space preservation activities of LCA. The mission of the Laurel Canyon Land Trust is to both preserve land for the enjoyment and education of residents and to provide habitat for the wildlife of the Santa Monica Mountains. The Laurel Canyon Land Trust is a public benefit 501(c)(3) corporation.

In partnership with federal, state and local organizations, the Laurel Canyon Land Trust works to acquire existing undeveloped lands in Laurel Canyon in order to preserve the natural environment. This open space is used for historical, educational, ecological, recreation and scenic purposes. Additionally, the Laurel Canyon Land Trust works with property owners to obtain conservation easements over land that they already own. These conservation easements protect existing land from development while maintaining the ability of property owners to enjoy their property in an environmentally responsible manner. The Laurel Canyon Land Trust's vision is to preserve large blocks of natural open space where native plants and animals can thrive and children and adults can learn about the natural environment.

Tel: 310-709-9600
Email: jamie@lclandtrust.org

The preservation of the remaining vacant land in Laurel Canyon is especially important because Laurel Canyon is located in an environmentally sensitive area and is home to a watershed and greenbelt for the vastly developed plains of Los Angeles and the San Fernando Valley. The natural space and beauty of Laurel Canyon has inspired residents, artists and musicians for over 100 years. Additionally, the hills in Laurel Canyon have provided a scenic backdrop for the rest of Los Angeles and the forested valleys and chaparral-draped hillsides have offer habitat for native wildlife.

The Hollywood Community Plan Update ("HCP") provide the following policy:

- Policy "PR3.1 **Preserve open space.** Maintain, preserve, and enhance open space, and recreational facilities, and park space within the Hollywood Community Plan Area. Encourage the retention of passive open space which provides a balance to the urban development of the Community Plan Area.

This is laudable goal with LCLT fully supports. However, the HCP should include Implementation Programs to address this objective. LCLT recommends that the City re-zone to "Open Space" all land currently owned by Laurel Canyon Land Trust, the Mountains Recreation and Conservation Authority and the Santa Monica Mountains Conservancy. This will provide an additional layer of protections to these lands. LCLT is happy to provide the City with a list of all parcels that it has acquired.

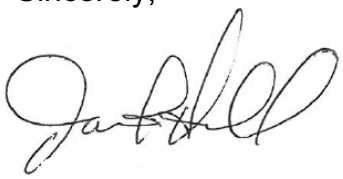
Additionally, LCLT recommends that all vacant/excess lands owned by the City and its subsidiaries (such as the Los Angeles Department of Water and Power) to Open Space. Believe it or not, the City actually owns quite a few parcels in the Hollywood Hills, including Laurel Canyon. LCLT would be happy to provide a list of these parcels to the City. Many of these parcels contain many mature native trees which sequester carbon and provide habitat for rare and threatened species such as the local Mountain Lion population which was just recently designated as a candidate species by the California Department of Fish and Wildlife under the California Endangered Species Act. One of these easiest ways to implement the City's expressed policy to "preserve open space" is for the City to rezone these excess/vacant parcels to "Open Space." Finally, the City should designate certain parcels on the Community Plan Map as "Desirable Open Space." This could at least provide the City with a roadmap for future acquisition and preservation. One such parcel is located off of Laurel Canyon Boulevard (a locally designated scenic highway). It is an 11.9 acre parcel that is home to a Walnut Woodland (APN 5567-029-032). This is one of the largest single undeveloped parcels in Laurel Canyon and a prime candidate

for open space preservation. Other parcels should be considered and LCLT would be happy to provide a more comprehensive list to the City for review.

LCLT incorporates by reference all the comments of the Laurel Canyon Association that have been submitted to the City in two separate letters on or about January 31, 2019. The HCP should outline a meaningful plan to turn this policy into a reality.

I may be contacted at (323) 709-9600 or at jamie@lclandtrust.org if you have any questions, comments or concerns.

Sincerely,



Jamie T. Hall
Laurel Canyon Land Trust
President

Hollywood Media District BID

2 messages

David Bass <dbass@basslawla.com> Wed, Dec 16, 2020 at 4:05 PM
To: "linda.lou@lacity.org" <linda.lou@lacity.org>, "hollywoodplan@lacity.org" <hollywoodplan@lacity.org>, "quetzalli.enrique@lacity.org" <quetzalli.enrique@lacity.org>
Cc: "Alfred Fraijo Jr." <afraijo@sheppardmullin.com>, "Lauren Chang (lchang@sheppardmullin.com)" <lchang@sheppardmullin.com>, "Malick, Mike" <Mike.Malick@marcusmillichap.com>, Miguel Padilla <mpadilla@cimgroup.com>

I am writing on behalf of the Hollywood Media District BID (the “Media District BID").

The attached letter was sent by property owners within the Media District BID requesting an extension of the 3.0 FAR section in the proposed Hollywood Community Plan Update-2.

This will confirm that the Media District BID fully supports the request to extend the 3.0 FAR to those properties identified in the attached letter. The Media District PLUM Committee voted unanimously last week to support this request. I publicly stated that support to the Planning Department during the public comments portion of the Open House on December 9.

Thank you.

David M. Bass, Esq.
David M. Bass & Associates, Inc.
948 N. Sycamore Ave.
Los Angeles, CA 90038
Telephone: 310-789-1152

860 Highland Associates - HCUP2 Comment Letter.pdf
12597K

Linda Lou <linda.lou@lacity.org>
To: David Bass <dbass@basslawla.com>, Hollywood Plan <hollywoodplan@lacity.org>

Hello David,

Thank you for your comment letter. It has been received and filed.

Best,

Linda

Linda Lou
Pronouns: She/Her/Hers
City Planner
Los Angeles City Planning
200 N. Spring St., Room 667
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1473
E-NEWS

[Quoted text hidden]

SheppardMullin

Sheppard, Mullin, Richter & Hampton LLP
333 South Hope Street, 43rd Floor
Los Angeles, California 90071-1422
213.620.1780 main
213.620.1398 fax
www.sheppardmullin.com

213.617.5567 direct
afraijo@sheppardmullin.com

File Number: 76DF-326572

December 16, 2020

VIA E-MAIL

Linda Lou
City Planner
City of Los Angeles
Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, CA 90012
E-Mail: linda.lou@lacity.org

Re: 860 Highland Associates and George L. Eastman Company Joint Comments on the Hollywood Community Plan Update (CPC-2016-1450-CPU)

Dear Ms. Lou:

We represent 860 Highland Associates, LLC and George L. Eastman Company, LLC (collectively "Highland Associates and Eastman Company" or "Property Owners"). This letter serves as our comment on the draft Hollywood Community Plan ("HCPU2"), released by the City of Los Angeles ("City") for public review in August 2020.

Together, Highland Associates and Eastman Company own a significant number of parcels in the Hollywood Media District Business Improvement District ("Media District") adjacent to the Media Use Expansion area in the HCPU2, including several key properties with existing entertainment and media uses, such as the BuzzFeed Studio Campus, Sephora Studios, Bond Entertainment, Periscope Post Production, Dektor Films, and Fotokem. The properties subject to this request are the industrial-zoned (M1) parcels bordered by Highland Avenue to the east, Lexington Avenue to north, Santa Monica Boulevard to the south, and Orange Drive to the west ("Properties"). The commercially-zoned (C2) parcels of the Fotokem facility at 6855 Santa Monica Boulevard are not included in this request. See Figure 1, below.

The City did not include any of the industrial-zoned Properties in any subareas, despite nearly 90% of the industrial-zoned properties in the Media District area being re-zoned. See Figure 2, below. This was a clear oversight. The existing uses on the Properties are studio and media-related and consistent with the vision of this area as an economic driver and jobs hub. Specifically, the Properties should have been included as part of the Hybrid Industrial Zone in the Media Use Expansion Area and Media/Entertainment Jobs Subarea, consistent with the anticipated zoning of the other media-related uses and the surrounding multi-family residential neighborhoods north of the Properties.

This request was first raised with the City by the Media District in a letter transmitted to the City on January 31, 2019. The Media District requested the Hybrid Industrial Zone in Subarea 17:3 (previously 17:1) be expanded to include the block bordered by N. McCadden Place to the east, Lexington Avenue to the north, and Santa Monica Boulevard to the south. The Media District continues to support the Property Owners' request and voted on December 7 at the Media District PLUM Committee to support this effort and spoke in support at the City's Hearing Officer Hearing on December 9.

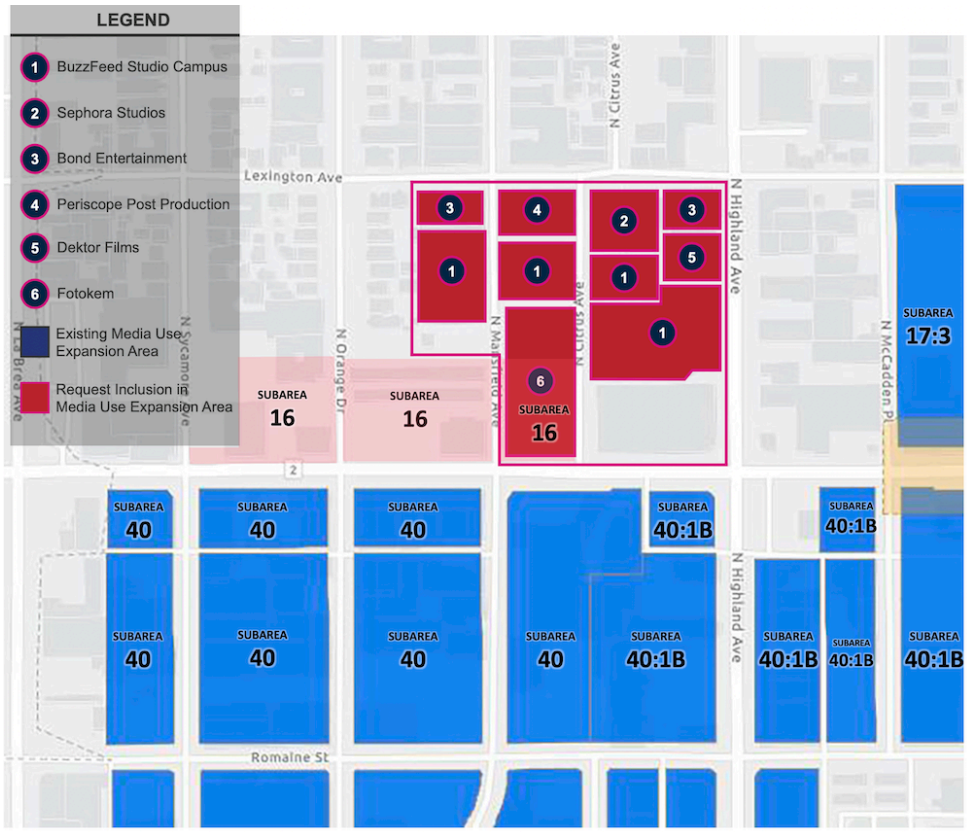


Figure 1: HCPU2: Properties Adjacent to the Media Use Expansion Area

Highland Associates and the Eastman Company request the following modifications to the HCPU2.

- Expand the boundaries of Subarea 17:3 to include the industrial-zoned portions of the Media District north of Santa Monica Boulevard overlooked by the re-zoning, including parcels 1 through 6, west of Highland Avenue, south of Lexington, east of Orange Drive, and north of Santa Monica Boulevard, highlighted in pink above in Figure 1.

- Modify the zoning of the Properties from M1-VL and M1-1VL-SN to [Q]CM-2D-SN, consistent with Subarea 17:3, which permits an FAR of 3:1 (with 0.7:1 FAR of targeted media-related uses), otherwise 1.5:1.[1]

- Expand the boundaries of the Media/Entertainment Jobs Subarea to include the Properties.

- Expand the boundaries of the Media Expansion Area to include the Properties.

Highland Associates and the Eastman Company appreciates the City's attention to this matter and the opportunity to comment.

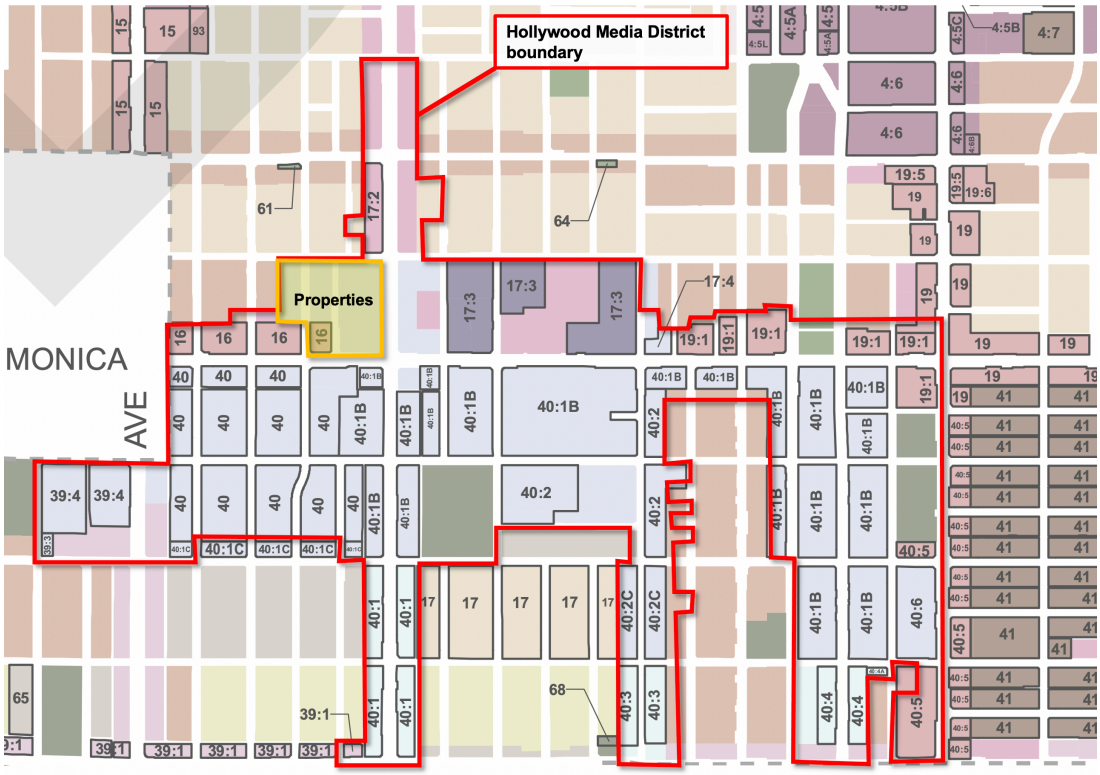


Figure 2: Hollywood Media District area

I. Existing Conditions

The Properties are located north of Santa Monica Boulevard, west of Highland Avenue, south of Lexington, and east of Orange Drive. The Properties subject to this request are approximately 358,878 square feet and are currently improved with various buildings and parking lots currently used for entertainment and media production uses, storage, and warehouse uses. The Properties are located within key transit corridors, approximately 0.7 miles south of the

[1] Draft Hollywood Q & D Regulations, pp. 12-13.

Hollywood/Highland Metro Station and adjacent to the Santa Monica/Highland Rapid Bus Transit (Line 704) Stop.

The parcels within the Properties are currently comprised of three zones: M1-1VL primary along Lexington Avenue; M1-1VL-SN adjacent to Highland Avenue to the east and Santa Monica Boulevard to the south; and C2-1D for parcel along Santa Monica Boulevard between Citrus Avenue and Mansfield Avenue. See Figure 3, below. The parcels with the M1 zoning designation have a land use designation of Light Industrial and the C2 parcel is considered General Commercial. (See Attachment A, Zimas Parcel Profile Report). Industrial zones (M1-1VL and M1-1VL-SN) are the dominant zoning at approximately 88%, or 316,800 square feet.

The M1 zone permits a variety of light commercial, industrial and manufacturing uses, and the C2 permits a range of commercial and residential uses. Similar zoning is common throughout the area to the south and east along the Santa Monica Boulevard corridor. A mix of media production uses, parking lots, warehouses and consumer storage facilities, and light retail uses make up this area that is contiguous with the development patterns that span across throughout the Properties. The parcels north of Lexington Avenue consist of multi-family residential zoning with apartments and other multi-residential buildings. The industrial-zoned Properties are currently subject to a 45-foot height limitation with a FAR of 1.5:1. The commercially-zoned Fotokem parcels have no height limit and the current FAR is limited to 0.5:1.

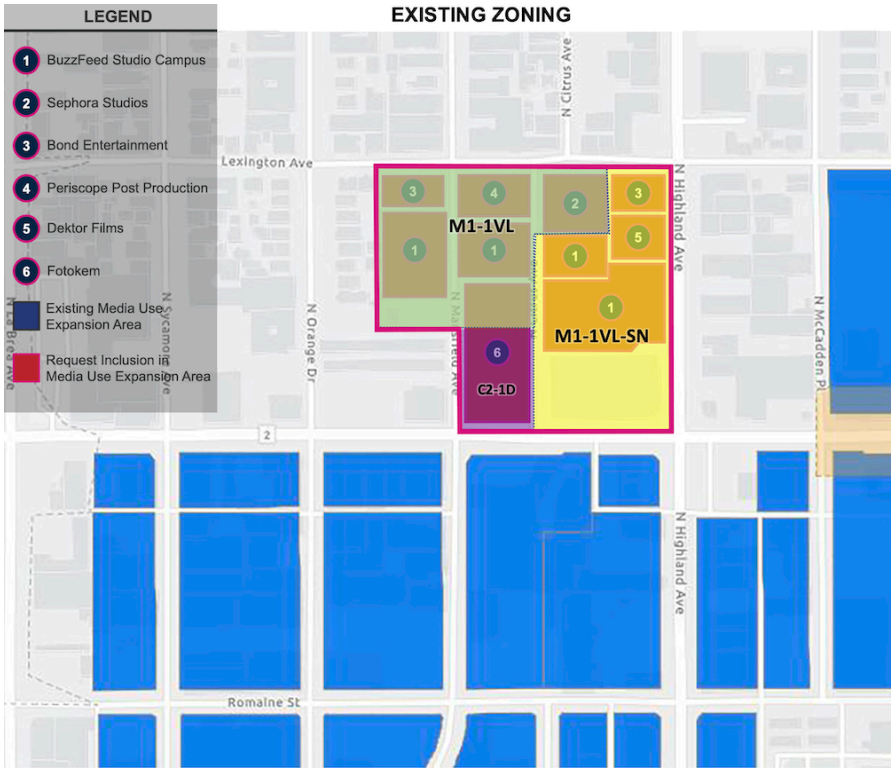


Figure 3: Existing Zoning

II. Proposed Zoning in HCPU2

The HCPU2 does not propose any zone changes to the industrial-zoned parcels at the Properties, despite the Properties being close to transit and only one block (approximately 400 feet) west from the Hybrid Industrial Zone and adjacent to the Media Expansion Area and Media/Entertainment Jobs Subarea area of the HCPU2 to the south. See Figure 1, above. The surrounding subareas all permit an FAR of 3:1 in the Media Expansion Area (Subareas 17:3, 40, 40:1B) and CPIO Corridors (Subarea 16), while the Properties continue to be restricted at a FAR 1.5:1. See Figure 4, below. This omission will place the Properties at a significant disadvantage compared to other properties in the Media District and Media Expansion Area, despite being similarly situated. The HCPU2 also does not capture the existing uses, needs of the new media tenants, or the potential for this area to continue into the future as a vibrant economic driver and new media jobs center for the City of Los Angeles.

III. Requested Revisions to HCPU2

The regulations specific to the Property would limit Highland Associates and the Eastman Company's ability to maximize the use of the Property compared to other adjacent sites and attract potential future investors or buyers. As such, Highland Associates and the Eastman Company request the following modifications to the HCPU2.

- Expand the boundaries of Subarea 17:3 to include the industrial-zoned portions of the Media District north of Santa Monica Boulevard overlooked by the re-zoning, including parcels 1 through 6, west of Highland Avenue, south of Lexington, east of Orange Drive, and north of Santa Monica Boulevard. See Figure 1, above.

- Modify the zoning of the Properties from M1-VL and M1-1VL-SN to [Q]CM-2D-SN, consistent with Subarea 17:3, which permits an FAR of 3:1 (with 0.7:1 FAR of targeted media-related uses), otherwise 1.5:1.[2]

- Expand the boundaries of the Media/Entertainment Jobs Subarea to include the Properties.

- Expand the boundaries of the Media Expansion Area to include the Properties.

As discussed in more detail below, the City should incorporate these suggested amendments for several reasons. First, the City's plan re-zones 90% of the Media District, but leaves out the critical intersection of Highland Avenue and Santa Monica Boulevard where the Properties are located. The existing uses on the Properties reflect the targeted media-related uses envisioned for this area and the HCPU2 should reflect the re-zoning of the surrounding areas. Put simply, the proposed zoning should match what is already located in the surrounding area and plan for the future development of this area. Second, the Properties are the same character as the properties one block east re-zoned as Hybrid Industrial Zone, consistent with the HCPU2 goals and policies. Third, additional density should be located near transit hubs consistent with Goal

[2] Draft Hollywood Q & D Regulations, pp. 12-13.

LU9. The Properties and surrounding area are all located in a Transit Priority Area. Fourth, the area surrounding the Property has already been developed and continues to be developed with high-density developments. Revising the zoning would allow the Property Owners or a potential future investor to maximize the future development potential consistent with the neighboring properties without limiting the Property compared to recent redevelopment projects in the immediate vicinity.

A. The City Should Expand Subarea 17:3 to Include the Properties as Hybrid Industrial Zones in the Media Expansion Area

The City should have included the Properties as Hybrid Industrial Zone (Subarea 17:3) and as part of the re-zoning effort of the Media Expansion Area and Media/Entertainment Jobs Subarea. All of the industrial-zoned properties south of Santa Monica Boulevard and the parcels north of Santa Monica Boulevard (with the exception of the Properties) are slated for re-zoning to allow an FAR of 3:1 with inclusion of 0.7 media-related uses.[3] See Figure 2, above.

The Properties are a clear exception, despite also being job creators at critical intersections in the Media District that transition the industrial uses south of Santa Monica Boulevard to the multi-family residential uses north of Lexington Avenue. These intersections, like McCadden/Santa Monica, Las Palmas/Santa Monica, and Seward/Santa Monica, are close to transit, have existing studio, media, and entertainment uses, and importantly are bordered by Low I Residential Zones to the north and Limited Industrial Zones to the south.[4] This is the City's opportunity to revise the zoning to provide forward-looking planning and match what is already located in the surrounding area, i.e., media and entertainment related uses. The Properties are occupied almost exclusively by media/entertainment/studio businesses with a significant number of employees, including the following:

1. BuzzFeed Studios – Eight buildings totaling approximately 130,000 sf; approximately 500 employees.
2. Sephora Studios – Two buildings totaling approximately 28,000 sf, anticipated approximately 175 employees.
3. Bond Entertainment – Multiple buildings approximately 30,000 sf.
4. Dektor Film – Approximately 6,500 sf.
5. Periscope Post & Audio – Approximately 20,000 sf.
6. FotoKem Hollywood – Approximately 40,000 sf, approximately 200 employees.

Furthermore, the Properties are the same character as Subarea 17:3, the properties one-block east re-zoned as Hybrid Industrial Zones. Specifically, these properties are located near transit, mostly media/entertainment businesses adjacent to multi-family residential uses north of Lexington Avenue. This requested zoning would not only support the Properties' future redevelopment by providing job-generating uses near transit, it would support the City's current and future development objectives, including Goal LU10, Policies LU10.4, LU10.5, and LU10.6,

[3] The surrounding subareas all permit an FAR of 3:1 in the Media Expansion Area (Subareas 17:3, 40, 40:1B) and CPIO Corridors (Subarea 16), while the Properties continue to be restricted at a FAR 1.5:1.
[4] See Hollywood Community Plan Update, Proposed Land Use Map, August 2020.

and Program P18.[5] These objectives are meant to retain existing industrial uses in the Media District by incentivizing mixed-use development with additional FAR with inclusion of industrial uses at the perimeter to better transition the industrial uses in the Media District to the multi-family residential neighborhood north of Lexington Avenue.

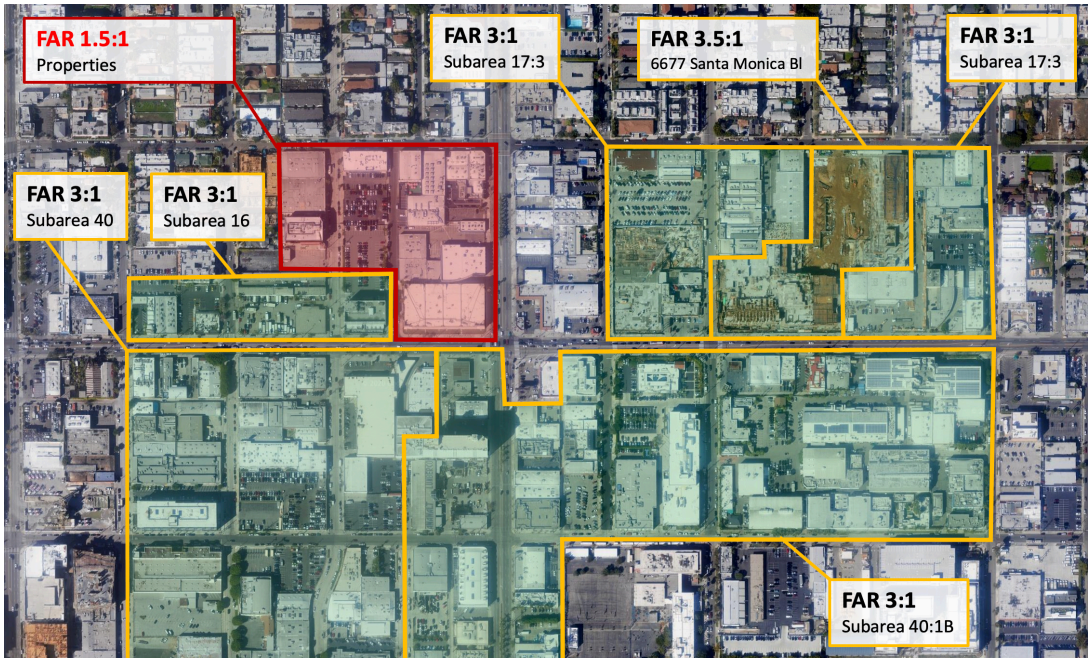


Figure 4: Proposed FAR

Without re-zoning the properties, the City is putting the Properties at risk of being purchased and re-zoned as a high-density mixed-use residential development by a future property owner seeking to convert the properties to a higher and better use. The Properties have significant space for future development opportunities and have been used by media and entertainment companies for decades, including Francis Ford Coppola's Zoetrope Studios, Fuji Film, Hollywood Cinema Arts, Max Factor Cosmetics, and Scenery West. Including the Properties in the Hybrid Industrial Zones provide protection for the multi-family residential uses to the north while providing the Property Owners with additional flexibility and incentives to maintain media and entertainment uses at the Properties and the long-term vitally of the industrial uses in the Media District. This zoning would also permit additional much-needed housing opportunities while preserving the existing media-related uses.

[5] HCPU2, Chapter 7: Implementation, P.18: Establish new zoning districts that encourage a mix of industrial uses with commercial or residential uses.

B. The City Should Increase the FAR to Concentrate Density Near Transit Hubs, Consistent with Surrounding High-Density Subareas and Approved Developments

The proposed changes will ensure growth is directed to transit hubs and corridors and away from low-density neighborhoods. The Property is approximately 0.7 miles south of the Hollywood/Highland Metro Station and adjacent to the Santa Monica/Highland Rapid Bus (Line 704). The requested zoning would ensure that the Properties are incentivized to keep the targeted media-related uses in the area to ensure future employment opportunities and promotes the vitality and expansion of Hollywood's diverse industries. The revisions would maximize development opportunities around existing transit systems to encourage sustainable land use while minimizing potential adverse impacts. This is consistent with the HCPU2's goals for this area, including Goal LU9, LU9.1: Incentivize jobs and housing growth around transit nodes and along transit corridors.

Furthermore, the requested density would not impact the conclusions in the Draft EIR, additional employment and housing opportunities near transit is exactly where additional density and development should be located. The Recirculated Draft EIR relies on concentrating housing and employment opportunities near existing transit system to ensure less than significant impacts related to VMT. This request is consistent with the City's programmatic approach.

The area surrounding the Properties has already been developed and continues to be developed at a much higher density than proposed for the Properties in the HCPU2. See Figure 4, above. For example, an existing project approved on Santa Monica Boulevard and McCadden Place includes a 100% residential project at an FAR of 3.5:1 (Case No. CPC-2016-1083-GPA-VZC-HD-DB-SPR). The additional residential density added by this project creates a need for additional employment opportunities and media uses is required to meet the evolving needs of the area. Revising the zoning would allow the Property Owners or a potential future investor to maximize the future development potential consistent while balancing the need to retain media and entertainment uses at the Properties and in the immediately vicinity.

C. The City Should Increase the FAR to Accommodate the Changing Industry and New Media Uses in the Media District

The City's proposed zoning for the Properties will restrict growth at Highland/Santa Monica Boulevard for years to come. At a minimum, the Properties should have been included as part of the Media Expansion Area and Media/Entertainment Jobs Subarea. This omission will place the Properties at a significant disadvantage compared to other properties in the Media District, considering the changing economy and needs of new media uses.

The existing tenants at the Properties have evolving needs that are not consistent with low-density zoning that is typical of a traditional industrial area. Tenants of these new media uses look for a mix of uses necessary to stimulate productivity and growth, i.e., modernized campuses with commercial and residential uses to complement job creation. Allowing additional density would allow the Property Owners to meet these needs while sustaining media uses and continuing the vitality of this area as an economic driver and new media jobs center for the City of Los Angeles. This request is consistent with the HCPU2's primary objectives of

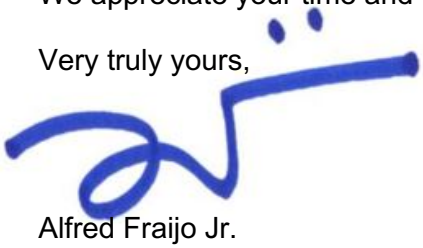
balancing of jobs and housing with mixed-use development and accommodating commercial uses for future employment opportunities.

D. The Requested Changes Do Not Trigger Recirculation of the Draft EIR

Importantly, the proposed re-zoning of the Properties requested herein would not trigger recirculation of the City's Draft EIR. The zoning is consistent with the programmatic goals of the HCPU2, including the additional FAR and uses sought by this request. For example, the zoning would support Policies LU10.5 and LU10.6, encouraging mixed-use development at the perimeter of the industrial districts to better transition the industrial uses in the Media District area to the residential neighborhood north of Lexington Avenue. Furthermore, any future redevelopment or expansion at the Properties would be subject to the City's existing requirements (including Site Plan Review) and required to undergo its own environmental assessment, as recognized by Policy LU10.4, which requires a discretionary approval of additional FAR (up to 3:1).

We appreciate your time and hope you consider our requested revisions in the final HCPU2.

Very truly yours,



Alfred Fraijo Jr.
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

SMRH:4810-4678-3444.4
RH:
Encls.

City of Los Angeles
Department of City Planning

12/16/2020
PARCEL PROFILE REPORT

PROPERTY ADDRESSES
6904 W LEXINGTON AVE
6908 W LEXINGTON AVE
6912 W LEXINGTON AVE

ZIP CODES
90038

RECENT ACTIVITY
None

CASE NUMBERS
CPC-2016-1450-CPU
CPC-2014-669-CPU
CPC-2008-1027-GPA-ZC-HD-CUB-SPR-GB
CPC-2005-6082
CPC-1997-43-CPU
CPC-1986-831-GPC
CPC-1984-1-HD
ORD-164708
ORD-161116-SA19
ZA-2012-2185-CU
ZA-2009-1516-CUB
VTT-69385-GB
ENV-2016-1451-EIR
ENV-2014-670-SE
ENV-2012-2186-CE
ENV-2009-1517-MND
ENV-2007-3810-EIR-GB
AFF-67902

Address/Legal Information	
PIN Number	144B181 325
Lot/Parcel Area (Calculated)	7,001.7 (sq ft)
Thomas Brothers Grid	PAGE 593 - GRID D5
Assessor Parcel No. (APN)	5532017019
Tract	TR 1658
Map Reference	M B 20-64
Block	None
Lot	91
Arb (Lot Cut Reference)	None
Map Sheet	144B181
Jurisdictional Information	
Community Plan Area	Hollywood
Area Planning Commission	Central
Neighborhood Council	Central Hollywood
Council District	CD 4 - David E. Ryu
Census Tract #	1919.01
LADBS District Office	Los Angeles Metro
Planning and Zoning Information	
Special Notes	None
Zoning	M1-1VL
Zoning Information (ZI)	ZI-2374 State Enterprise Zone: Los Angeles
	ZI-2452 Transit Priority Area in the City of Los Angeles
General Plan Land Use	Limited Manufacturing
General Plan Note(s)	Yes
Hillside Area (Zoning Code)	No
Specific Plan Area	None
Subarea	None
Special Land Use / Zoning	None
Historic Preservation Review	No
Historic Preservation Overlay Zone	None
Other Historic Designations	None
Other Historic Survey Information	None
Mills Act Contract	None
CDO: Community Design Overlay	None
CPIO: Community Plan Imp. Overlay	None
Subarea	None
CUGU: Clean Up-Green Up	None
HCR: Hillside Construction Regulation	No
NSO: Neighborhood Stabilization Overlay	No
POD: Pedestrian Oriented Districts	None
RFA: Residential Floor Area District	None
RIO: River Implementation Overlay	No
SN: Sign District	No
Streetscape	No
Adaptive Reuse Incentive Area	None
Affordable Housing Linkage Fee	

Residential Market Area	Medium-High
Non-Residential Market Area	High
Transit Oriented Communities (TOC)	Tier 2
RPA: Redevelopment Project Area	None
Central City Parking	No
Downtown Parking	No
Building Line	None
500 Ft School Zone	No
500 Ft Park Zone	No
Assessor Information	
Assessor Parcel No. (APN)	5532017019
APN Area (Co. Public Works)*	1.377 (ac)
Use Code	1700 - Commercial - Office Building - One Story
Assessed Land Val.	$3,500,502
Assessed Improvement Val.	$6,503,922
Last Owner Change	10/26/1989
Last Sale Amount	$9
Tax Rate Area	67
Deed Ref No. (City Clerk)	921288
	194
	1875214-5
	1731698
Building 1	
Year Built	1936
Building Class	D65B
Number of Units	0
Number of Bedrooms	0
Number of Bathrooms	0
Building Square Footage	12,109.0 (sq ft)
Building 2	
Year Built	1942
Building Class	C6A
Number of Units	0
Number of Bedrooms	0
Number of Bathrooms	0
Building Square Footage	28,432.0 (sq ft)
Building 3	
Year Built	1991
Building Class	BX
Number of Units	0
Number of Bedrooms	0
Number of Bathrooms	0
Building Square Footage	29,184.0 (sq ft)
Building 4	No data for building 4
Building 5	No data for building 5
Rent Stabilization Ordinance (RSO)	No [APN: 5532017019]
Additional Information	
Airport Hazard	None
Coastal Zone	None
Farmland	Area Not Mapped
Urban Agriculture Incentive Zone	YES
Very High Fire Hazard Severity Zone	No
Fire District No. 1	No
Flood Zone	Outside Flood Zone
Watercourse	No

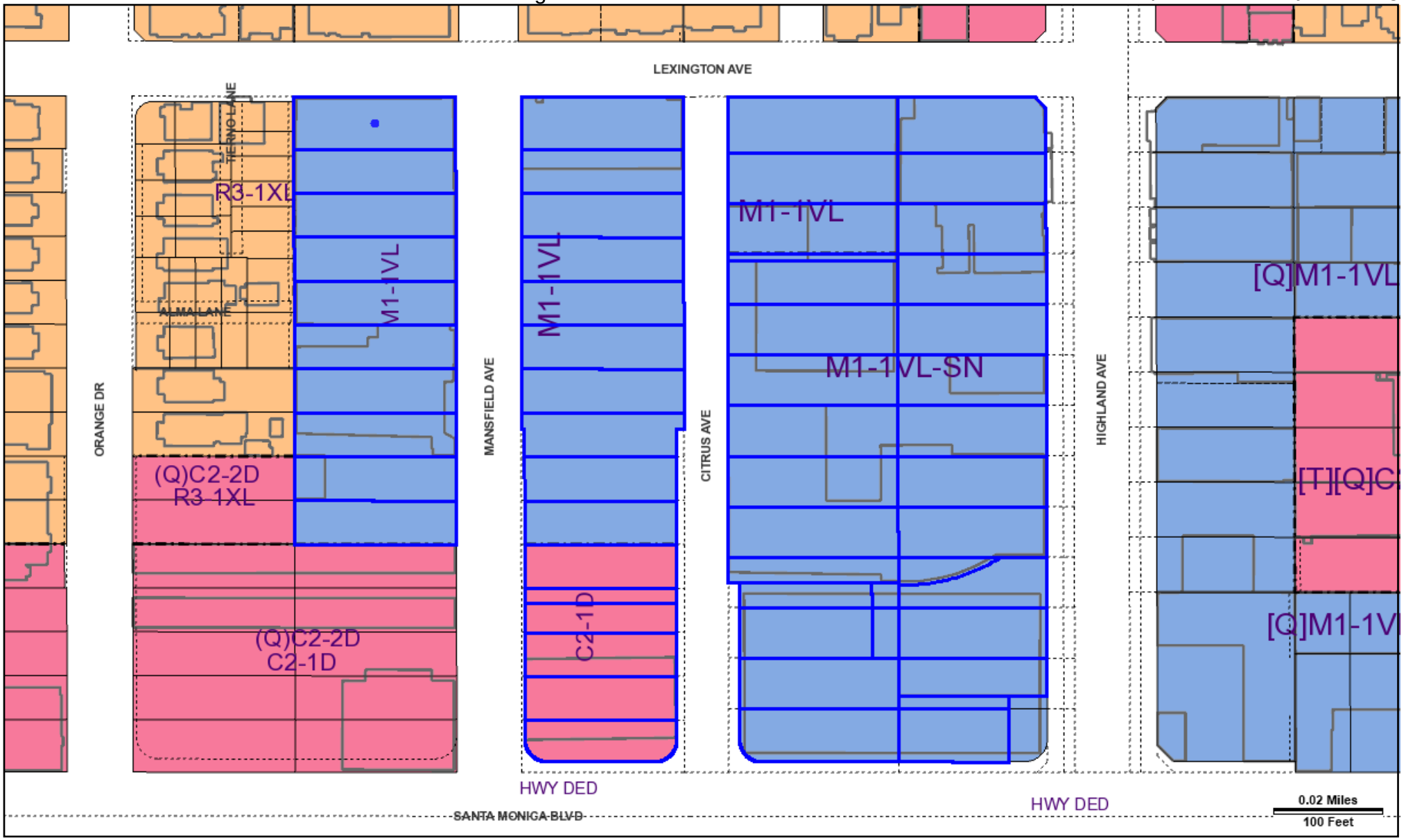
Hazardous Waste / Border Zone Properties	No
Methane Hazard Site	None
High Wind Velocity Areas	No
Special Grading Area (BOE Basic Grid Map A-13372)	No
Wells	None
Seismic Hazards	
Active Fault Near-Source Zone	
Nearest Fault (Distance in km)	1.39997688
Nearest Fault (Name)	Hollywood Fault
Region	Transverse Ranges and Los Angeles Basin
Fault Type	B
Slip Rate (mm/year)	1.00000000
Slip Geometry	Left Lateral - Reverse - Oblique
Slip Type	Poorly Constrained
Down Dip Width (km)	14.00000000
Rupture Top	0.00000000
Rupture Bottom	13.00000000
Dip Angle (degrees)	70.00000000
Maximum Magnitude	6.40000000
Alquist-Priolo Fault Zone	No
Landslide	No
Liquefaction	No
Preliminary Fault Rupture Study Area	No
Tsunami Inundation Zone	No
Economic Development Areas	
Business Improvement District	HOLLYWOOD MEDIA DISTRICT
Hubzone	Not Qualified
Opportunity Zone	No
Promise Zone	None
State Enterprise Zone	LOS ANGELES STATE ENTERPRISE ZONE
Housing	
Direct all Inquiries to	Housing+Community Investment Department
Telephone	(866) 557-7368
Website	http://hcidla.lacity.org
Rent Stabilization Ordinance (RSO)	No [APN: 5532017019]
Ellis Act Property	No
AB 1482: Tenant Protection Act	No
Public Safety	
Police Information	
Bureau	West
Division / Station	Hollywood
Reporting District	665
Fire Information	
Bureau	West
Batallion	5
District / Fire Station	27
Red Flag Restricted Parking	No

ZIMAS PUBLIC

Generalized Zoning

12/16/2020

City of Los Angeles
Department of City Planning



Address: 6904 W LEXINGTON AVE
APN: 5532017019
PIN #: 144B181 325

Tract: TR 1658
Block: None
Lot: 91
Arb: None

Zoning: M1-1VL
General Plan: Limited Manufacturing

N
W
E
S

LEGEND

GENERALIZED ZONING

- OS, GW
- A, RA
- RE, RS, R1, RU, RZ, RW1
- R2, RD, RMP, RW2, R3, RAS, R4, R5, PVSP
- CR, C1, C1.5, C2, C4, C5, CW, WC, ADP, LASED, CEC, USC, PPSP, MU, NMU
- CM, MR, CCS, UV, UI, UC, M1, M2, LAX, M3, SL, HJ, HR, NI
- P, PB
- PF

GENERAL PLAN LAND USE

LAND USE

RESIDENTIAL

- Minimum Residential
- Very Low / Very Low I Residential
- Very Low II Residential
- Low / Low I Residential
- Low II Residential
- Low Medium / Low Medium I Residential
- Low Medium II Residential
- Medium Residential
- High Medium Residential
- High Density Residential
- Very High Medium Residential

COMMERCIAL

- Limited Commercial
- Limited Commercial - Mixed Medium Residential
- Highway Oriented Commercial
- Highway Oriented and Limited Commercial
- Highway Oriented Commercial - Mixed Medium Residential
- Neighborhood Office Commercial
- Community Commercial
- Community Commercial -Mixed High Residential
- Regional Center Commercial

INDUSTRIAL

- Commercial Manufacturing
- Limited Manufacturing
- Light Manufacturing
- Heavy Manufacturing
- Hybrid Industrial

PARKING

- Parking Buffer

PORT OF LOS ANGELES

- General / Bulk Cargo - Non Hazardous (Industrial / Commercial)
- General / Bulk Cargo - Hazard
- Commercial Fishing
- Recreation and Commercial
- Intermodal Container Transfer Facility Site

LOS ANGELES INTERNATIONAL AIRPORT

- Airport Landside / Airport Landside Support
- Airport Airside
- LAX Airport Northside

OPEN SPACE / PUBLIC FACILITIES

- Open Space
- Public / Open Space
- Public / Quasi-Public Open Space
- Other Public Open Space
- Public Facilities

FRAMEWORK

COMMERCIAL

- Neighborhood Commercial
- General Commercial
- Community Commercial
- Regional Mixed Commercial

INDUSTRIAL

- Limited Industrial
- Light Industrial

CIRCULATION

STREET

- Arterial Mountain Road
- Collector Scenic Street
- Collector Street
- Collector Street (Hillside)
- Collector Street (Modified)
- Collector Street (Proposed)
- Country Road
- Divided Major Highway II
- Divided Secondary Scenic Highway
- Local Scenic Road
- Local Street
- Major Highway (Modified)
- Major Highway I
- Major Highway II
- Major Highway II (Modified)
- Major Scenic Highway
- Major Scenic Highway (Modified)
- Major Scenic Highway II
- Mountain Collector Street
- Park Road
- Parkway
- Principal Major Highway
- Private Street
- Scenic Divided Major Highway II
- Scenic Park
- Scenic Parkway
- Secondary Highway
- Secondary Highway (Modified)
- Secondary Scenic Highway
- Special Collector Street
- Super Major Highway

FREEWAYS

- Freeway
- Interchange
- On-Ramp / Off- Ramp
- Railroad
- Scenic Freeway Highway

MISC. LINES

- Airport Boundary
- Bus Line
- Coastal Zone Boundary
- Coastline Boundary
- Collector Scenic Street (Proposed)
- Commercial Areas
- Commercial Center
- Community Redevelopment Project Area
- Country Road
- DWP Power Lines
- Desirable Open Space
- Detached Single Family House
- Endangered Ridgeline
- Equestrian and/or Hiking Trail
- Hiking Trail
- Historical Preservation
- Horsekeeping Area
- Local Street
- MSA Desirable Open Space
- Major Scenic Controls
- Multi-Purpose Trail
- Natural Resource Reserve
- Park Road
- Park Road (Proposed)
- Quasi-Public
- Rapid Transit Line
- Residential Planned Development
- Scenic Highway (Obsolete)
- Secondary Scenic Controls
- Secondary Scenic Highway (Proposed)
- Site Boundary
- Southern California Edison Power
- Special Study Area
- Specific Plan Area
- Stagecoach Line
- Wildlife Corridor

POINTS OF INTEREST

- Alternative Youth Hostel (Proposed)
- Animal Shelter
- Area Library
- Area Library (Proposed)
- Bridge
- Campground
- Campground (Proposed)
- Cemetery
- HW Church
- City Hall
- Community Center
- Community Library
- Community Library (Proposed Expansion)
- Community Library (Proposed)
- Community Park
- Community Park (Proposed Expansion)
- Community Park (Proposed)
- Community Transit Center
- Convalescent Hospital
- Correctional Facility
- Cultural / Historic Site (Proposed)
- Cultural / Historical Site
- Cultural Arts Center
- DMV DMV Office
- DWP DWP
- DWP Pumping Station
- Equestrian Center
- HQ Fire Department Headquarters
- Fire Station
- Fire Station (Proposed Expansion)
- Fire Station (Proposed)
- Fire Supply & Maintenance
- Fire Training Site
- Fireboat Station
- Health Center / Medical Facility
- Helistop
- Historic Monument
- Historical / Cultural Monument
- Horsekeeping Area
- Horsekeeping Area (Proposed)
- Horticultural Center
- Hospital
- Hospital (Proposed)
- HW House of Worship
- e Important Ecological Area
- e Important Ecological Area (Proposed)
- Interpretive Center (Proposed)
- JC Junior College
- M MTA / Metrolink Station
- M MTA Station
- MTA Stop
- MWD MWD Headquarters
- Maintenance Yard
- Municipal Office Building
- P Municipal Parking lot
- Neighborhood Park
- Neighborhood Park (Proposed Expansion)
- Neighborhood Park (Proposed)
- Oil Collection Center
- P Parking Enforcement
- HQ Police Headquarters
- Police Station
- Police Station (Proposed Expansion)
- Police Station (Proposed)
- Police Training site
- PO Post Office
- Power Distribution Station
- Power Distribution Station (Proposed)
- Power Receiving Station
- Power Receiving Station (Proposed)
- C Private College
- E Private Elementary School
- Private Golf Course
- Private Golf Course (Proposed)
- JH Private Junior High School
- PS Private Pre-School
- Private Recreation & Cultural Facility
- SH Private Senior High School
- SF Private Special School
- E Public Elementary (Proposed Expansion)
- E Public Elementary School
- E Public Elementary School (Proposed)
- Public Golf Course
- Public Golf Course (Proposed)
- Public Housing
- Public Housing (Proposed Expansion)
- JH Public Junior High School
- JH Public Junior High School (Proposed)
- MS Public Middle School
- SH Public Senior High School
- SH Public Senior High School (Proposed)
- Pumping Station
- Pumping Station (Proposed)
- Refuse Collection Center
- Regional Library
- Regional Library (Proposed Expansion)
- Regional Library (Proposed)
- Regional Park
- Regional Park (Proposed)
- RPD Residential Plan Development
- Scenic View Site
- Scenic View Site (Proposed)
- ADM School District Headquarters
- SC School Unspecified Loc/Type (Proposed)
- Skill Center
- SS Social Services
- Special Feature
- Special Recreation (a)
- SF Special School Facility
- SF Special School Facility (Proposed)
- Steam Plant
- sm Surface Mining
- Trail & Assembly Area
- Trail & Assembly Area (Proposed)
- UTL Utility Yard
- Water Tank Reservoir
- Wildlife Migration Corridor
- Wildlife Preserve Gate

SCHOOLS/PARKS WITH 500 FT. BUFFER

- Existing School/Park Site
- Planned School/Park Site
- Inside 500 Ft. Buffer

- Aquatic Facilities
- Beaches
- Child Care Centers
- Dog Parks
- Golf Course
- Historic Sites
- Horticulture/Gardens
- Skate Parks
- Other Facilities
- Park / Recreation Centers
- Parks
- Performing / Visual Arts Centers
- Recreation Centers
- Senior Citizen Centers
- Opportunity School
- Charter School
- Elementary School
- Span School
- Special Education School
- High School
- Middle School
- Early Education Center

COASTAL ZONE

- Coastal Zone Commission Authority
- Calvo Exclusion Area
- Not in Coastal Zone
- Dual Jurisdictional Coastal Zone

TRANSIT ORIENTED COMMUNITIES (TOC)

- Tier 1
- Tier 2
- Tier 3
- Tier 4

Note: TOC Tier designation and map layers are for reference purposes only. Eligible projects shall demonstrate compliance with Tier eligibility standards prior to the issuance of any permits or approvals. As transit service changes, eligible TOC Incentive Areas will be updated.

WAIVER OF DEDICATION OR IMPROVEMENT

- Public Work Approval (PWA)
- Waiver of Dedication or Improvement (WDI)

OTHER SYMBOLS

- Lot Line
- Tract Line
- Lot Cut
- Easement
- Zone Boundary
- Building Line
- Lot Split
- Community Driveway
- Building Outlines 2014
- Building Outlines 2008
- Airport Hazard Zone
- Census Tract
- Coastal Zone
- Council District
- LADBS District Office
- Downtown Parking
- Fault Zone
- Fire District No. 1
- Tract Map
- Parcel Map
- Flood Zone
- Hazardous Waste
- High Wind Zone
- Hillside Grading
- Historic Preservation Overlay Zone
- Specific Plan Area
- Very High Fire Hazard Severity Zone
- Wells

Quetzalli Enrique <quetzalli.enrique@lacity.org>

HCPU2 Comment Letter (Gower Gulch Shopping Center)

2 messages

Lauren Chang <lchang@sheppardmullin.com> Wed, Dec 16, 2020 at 12:27 PM
To: "linda.lou@lacity.org" <linda.lou@lacity.org>
Cc: "hollywoodplan@lacity.org" <hollywoodplan@lacity.org>, Craig Bullock <craig.bullock@lacity.org>

Hi Linda,

On behalf of our client Home of the Stars LP, we're providing the attached comment letter regarding the Hollywood Community Update Plan and recommended changes to be considered. Please let us know if we can provide any additional information. We appreciate the opportunity to continue to engage with the City on this matter.

Best,

Lauren K. Chang

(she/her/hers)
+1 213-617-5588 | direct

+1 858-900-4959 | mobile
lchang@sheppardmullin.com | Bio

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Home of the Stars - Gower Gulch - HCUP2 Comment Letter.pdf
1002K

Quetzalli Enrique <quetzalli.enrique@lacity.org> Wed, Dec 16, 2020 at 12:58 PM
To: Lauren Chang <lchang@sheppardmullin.com>
Cc: Hollywood Plan <hollywoodplan@lacity.org>, Linda Lou <linda.lou@lacity.org>

Hello Lauren,

Thank you for the comment letter. It has been received and filed.

Best,
Quetzalli

LOS ANGELES CITY PLANNING

Quetzalli Enrique
Preferred Pronouns: she, her, hers
Planning Assistant
Los Angeles City Planning
200 N. Spring St., Room 667
Los Angeles, CA 90012
T: (213) 978-1175 | Planning4LA.org
E-NEWS

[Quoted text hidden]

SheppardMullin

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File Number: 76DF-326572

December 16, 2020

VIA E-MAIL

Linda Lou
City Planner
City of Los Angeles
Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, CA 90012
E-Mail: linda.lou@lacity.org

Re: Home of the Stars, LP's Comments on the Hollywood Community Plan Update (CPC-2016-1450-CPU)

Dear Ms. Lou:

We represent Home of the Stars, LP ("Home of the Stars"). This letter serves as our comment on the draft Hollywood Community Plan ("HCPU2") and the Community Plan Implementation Overlay ("CPIO"), released in August 2020 by the City of Los Angeles ("City") for public review. Home of the Stars owns the Gower Gulch Shopping Center located at 6110-6134 W. Sunset Boulevard, Los Angeles, California, APN: 5546024019 (the "Property").

As discussed in more detail below, Home of the Stars seeks to maximize the future viability of the Property and development potential that is consistent with the HCPU2 as well as the surrounding development. The zoning proposed in the HCPU2 does not reflect the maximum development opportunities of the Property based on its location or the higher-density that the City deemed appropriate and important for other sites in the immediate vicinity. As further described herein, the City made significant findings to support additional density and FAR for those vicinity sites. The Home of the Stars site should be afforded the same benefit. The proposed zoning also does not achieve the stated goals in the HCUP2 to create "residential and commercial density, transit-oriented districts, affordable housing, and employment opportunities near transit infrastructure that supports sustainable and walkable neighborhoods."[1]

This is the City's opportunity to provide certainty regarding the planning process and encourage transit-orientated development. Given that the City is in the midst of a housing crisis and lacks much-needed affordable housing in this area, which is only 0.4 miles from the Hollywood/Vine Metro station, providing the necessary allowances to encourage additional density is vital. The Regional Center area of Hollywood is characterized by high-density land uses whose physical

[1] Draft Hollywood Community Plan (August 2020), pp. 3-21. Goal LU9.

form is substantially differentiated from lower-density neighborhoods in the community. As such, a series of land use policies in the HCUP2 are listed that encourage affordable housing near transit and utilization of higher FAR to incentivize mixed-use development around transit nods and along commercial corridors.[2] As such, we request the City make the following revisions to the HCPU2:

- Revise the CPIO to include the Property within the Regional Center 1 ("RC1") contiguous with adjacent parcels.

- Revise the CPIO to include the Property within the area designated to allow a base FAR of 4.5:1 and maximum bonus FAR of 6.75:1 that is contiguous with adjacent parcels.

We appreciate the opportunity to comment on the above-mentioned document.

I. Existing Conditions

The Property is located along Sunset Boulevard between Gower Street and El Centro Avenue. The Property is approximately 84,400 square feet and is currently improved with the Gower Gulch Shopping Center and currently used for commercial purposes. The Property is approximately 0.4 miles from the Hollywood/Vine Metro Station.

The Property is currently zoned C4-2D-SN with a land use designation of Regional Commercial Center (See Attachment A, Zimas Parcel Profile Report). The C4 zone permits a range of commercial and residential uses, including retail, office, hotel, and apartments. The sites surrounding the Property on Sunset Boulevard currently have similar zoning and are a mix of uses, including commercial, office uses, parking lots, apartments, multi-use buildings, and utilities uses. This area has experienced a resurgence of high-density development providing a variety of uses allowed within the C4 zoning district.

There is no height limitation at the Property under the current zoning. The FAR is limited to 2:1, which allows approximately 168,800 square feet of buildable area on the Property. The existing D Limitation[3] provides consistent zoning across the Property and surrounding area but restricts the FAR to 2:1. Without the D Limitation, the zoning would permit an FAR up to 6:1.

II. Proposed Zoning in Draft HCPU2

The latest revision of the HCPU2 CPIO places the Property within the Regional Center 2 ("RC2")[4] area of the CPIO and rezone as C4-2D-SN-CPIO.

[2] Draft Hollywood Community Plan (August 2020), pp. 3-14, 3-21. Policies LU5.5, LU9.2, and LU9.3.
[3] Ordinance No. 165652, adopted on March 21, 1990, effective May 6, 1990.
[4] The areas within the Regional Center extension area along Hollywood Boulevard and other peripheral areas in the Regional Center.

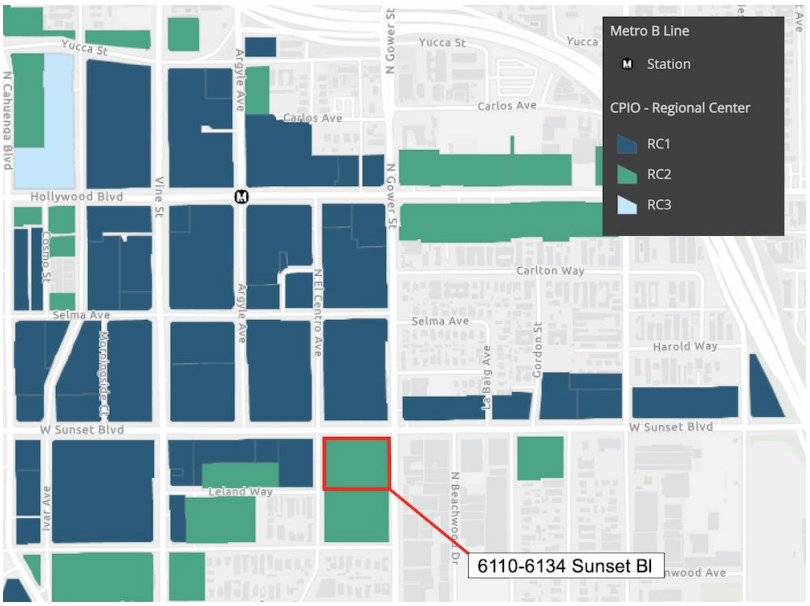


Figure 1: CPIO Regional Center areas and Property location.

The proposed rezoning at the Property would eliminate the current D Limitation and require new development projects to comply with the applicable regulations contained within the CPIO. In accordance with the regulations specific to the Property within the RC2 area, the following requirements are proposed that the Property would be subject to:

a) A base FAR 2:1 (which remains unchanged from the current D Limitation) but now allows a maximum bonus FAR of 3:1 for projects that include affordable housing of at least 10% Extremely Low Income, 14% Very Low Income, or 23% Lower income;[5]

b) A base density of 1 dwelling unit per 400 square feet. Projects that include affordable housing may qualify for a maximum bonus density of up to 1 dwelling unit per 200 square feet for all-residential projects and up to 1 dwelling unit per 115 square feet for mixed-used projects; and

c) Director-level discretionary review for projects involving sites with historical resources. Properties identified as historical resources include those that are eligible for listing as individual historic resources on the 1) National Register of Historic Places, 2) the California Register of Historic Resources, or 3) as contributors within a historic district that is eligible for listing at the Local, State, or National level.

The proposed CPIO regulations specific to the Property would limit Home of the Stars' ability to maximize the use of the Property compared to other adjacent sites by not providing any

[5] Draft Hollywood CPIO Concepts and Design Standards (August 2020), p. 17.

additional allowances with the base FAR. Retail and shopping centers (such as those present on the Property) must be able to contend with disruptions in the marketplace and changing trends, needs, and habits of consumers as a result of online commerce. Updates to the zoning for the Property would allow the current uses to integrate additional mixed-uses consistent with regional market trends. As such, the changes requested below will allow the Property to adapt to these changes and is linked to the HCUP2's objectives to create economic development, affordable housing, and job generation opportunities to the area.[6]

III. Proposed Revisions to HCPU2

Home the Stars requests that the City make the following revisions to the CPIO as applied to the Property:

- Revise the HCPU2 CPIO to include the Property within the RC1 contiguous with adjacent parcels.

- Revise the HCPU2 CPIO to include the Property within the area designated to allow a base FAR of 4.5:1 and maximum bonus FAR of 6.75:1 that is contiguous with adjacent parcels.

As discussed in more detail below, the City should incorporate these suggested amendments for several reasons. First, high-density development should be located in regional centers near transit hubs. The Property and surrounding area is within the Regional Center within a Transit Priority Area close to the Hollywood/Vine Metro Station. Second, the area surrounding the Property has already been developed and continues to be developed with high-density mixed-use developments at a much higher density than proposed in the HCPU2. The proposed zoning should match what is already located in the surrounding area and match the proposed zoning for the adjacent sites that permit higher density. Revising the zoning would allow Home of the Stars or a potential future investor to maximize the future development potential consistent with the neighboring properties without limiting the Property compared to recent redevelopment projects in the immediately vicinity.

A. Proximity to Transit and Alignment with HCPU2 Regional Center Development Goals

The Property is less than a half mile from Hollywood/Vine Metro station. RC1 is an area identified as adjacent to the Metro B Line (formally Red Line) and bus-served corridors, and as such encourages high-density transit orientated development. The CPIO proposes a base FAR and unrestricted height in most subareas within RC1 that would encourage this kind of development.

For example, in the RC1 subareas within the Sunset Boulevard and Vine Street corridors permit a base FAR of 4.5:1 with a bonus FAR of 6.75:1. However, this is not reflected for the Property despite being adjacent to and immediately surrounded by the RC1 subarea. It makes logical sense to have the Property within the RC1 as opposed to within the RC2 and allow for higher

[6] Draft Hollywood Community Plan (August 2020), p. 3-1.

FAR as within those same areas as well. The CPIO clearly shows the extent of the RC1 area that naturally captures the high-density areas of Hollywood. See Figures 2 and 3 below.

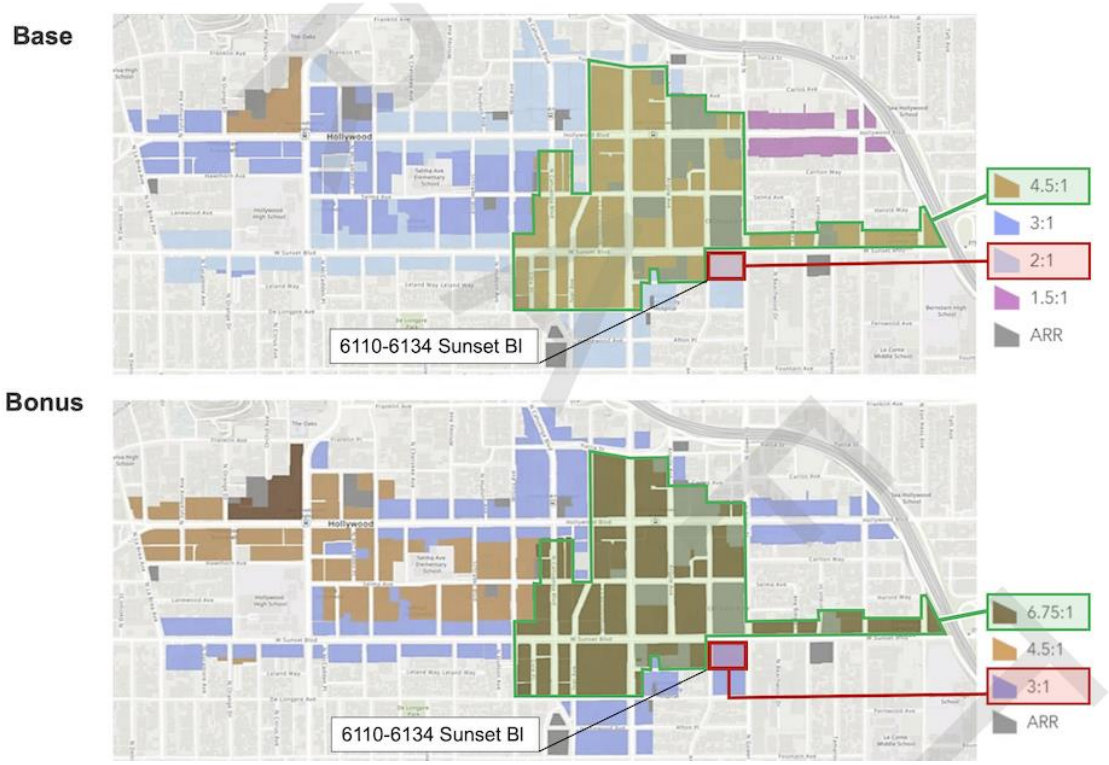
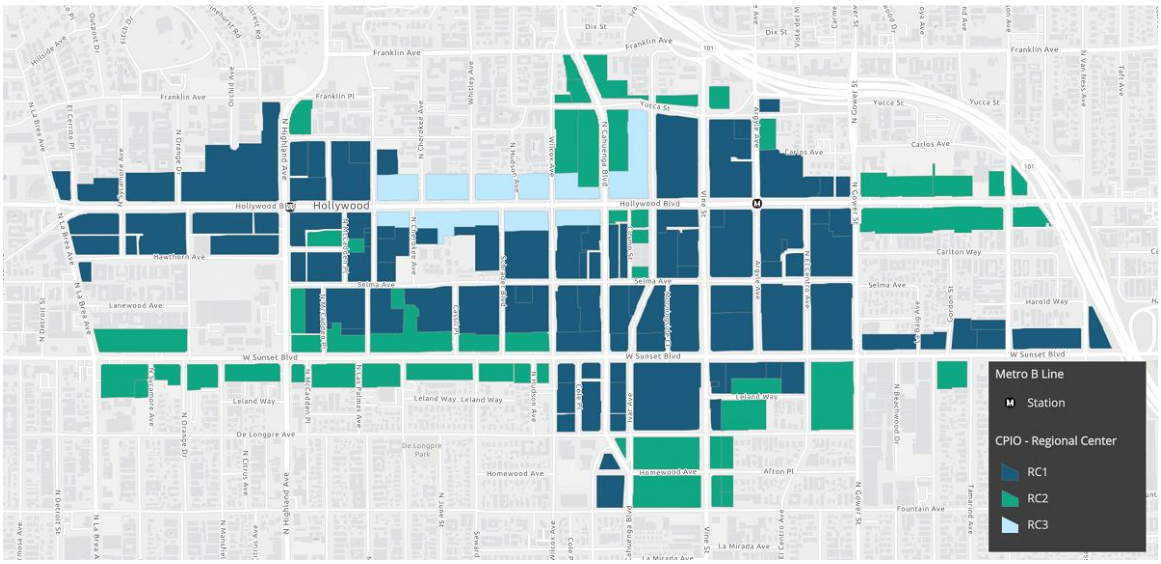


Figure 2: Proposed Base and Bonus FAR within the RC areas.



Figured 3: CPIO Regional Center areas

The Property's future redevelopment would provide job-generating uses near transit and would align with the City's current and future development objectives. These are exactly the type of uses encouraged in the surrounding Regional Center and transit corridors. In fact, the HCPU2 describes the Regional Center as "a hub of regional commerce and activity and contains a diversity of uses such as corporate and professional offices, multi-family residential uses, retail commercial malls, restaurants, mixed-use buildings, government buildings, major health facilities, major entertainment and cultural facilities."[7]

Home of the Stars would like to maximize the development potential of the Property to allow for future opportunities and it will be necessary to be similarly situated as neighboring sites that will be developed with higher densities. This area in Hollywood is experiencing a immense growth with high-density commercial and residential development with construction of several projects such as (1) the Columbia Square development, a one million square foot mixed-use campus of creative offices, residences, restaurants, and retail uses directly north of the Property; (2) the Palladium Residence development, a 730 residential unit development within two 28 story buildings northwest of the Property; and (3) a seven story 270 residential unit building with 12,120 square feet of commercial use directly west of the Property. These examples suggest that the area surrounding the Property is in high demand and developers are seeking high-intensity development, concentrated near transit.

High-intensity development of the area also allows an opportunity for developers to contribute to the City's affordable housing shortage. The HCUP2 supports the development of affordable housing by focusing housing and employment growth in Regional Centers.[8] Through the various bonuses and incentives proposed within the CPIO for the Regional Center areas, the creation of affordable housing is encouraged to achieve this objective. An increase in the FAR allowances as proposed would only further that goal by providing developers the opportunity to create and contribute to the City's affordable housing stock in and around transit stations and corridors.

Importantly, the requested changes to the CPIO are consistent with the primary objectives listed in the HCPU2 Draft Environmental Impact Report and would not trigger recirculation of the Draft EIR.[9] The proposed changes will ensure growth is concentrated in transit hubs and corridors and away from low-density neighborhoods. The revisions maximize development opportunities around existing transit systems to encourage sustainable land use while minimizing potential adverse traffic, greenhouse gas, and air quality impacts. Any future redevelopment or expansion at the Property would be required to undergo its own environmental assessment. Site Plan Review is still required as part of the CPIO.

B. *Alignment with Surrounding High-Density Subareas and Approved Developments*

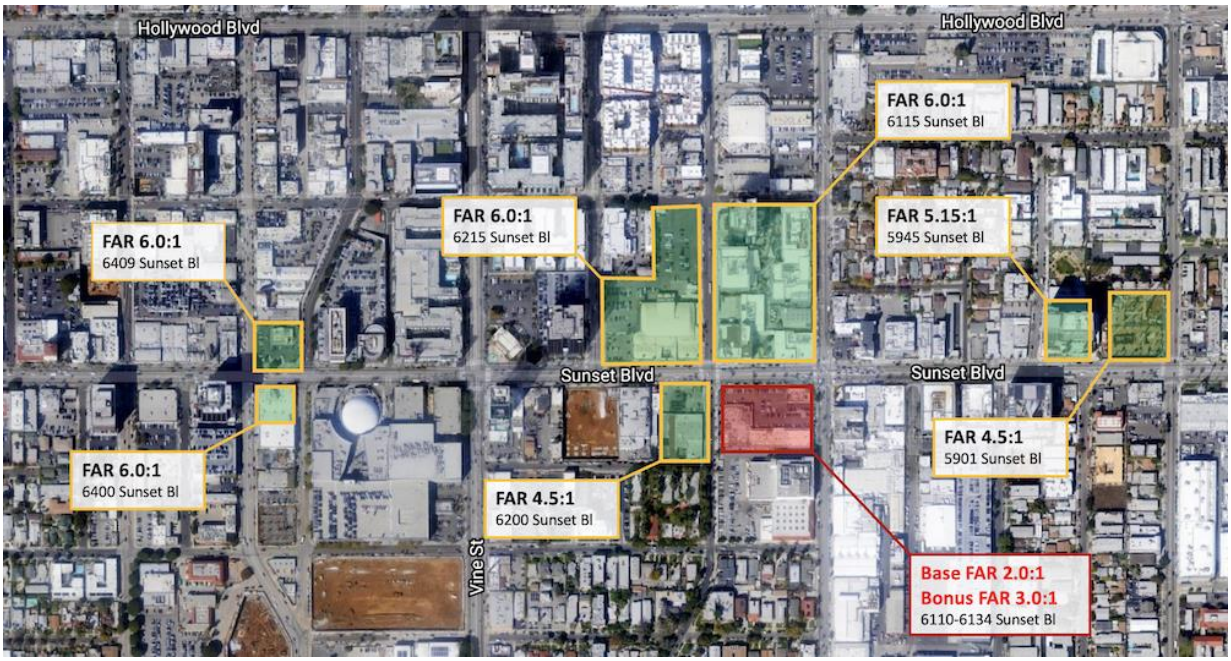
In recognizing the high-density nature of major corridors within the CPIO Regional Center areas, it is important to create a set of development standards that incorporate the scale of recent high-density projects approved by the City. The proposed zoning of the Property is not reflective of

[7] Draft Hollywood Community Plan (August 2020), p. 1-10.
[8] Draft Hollywood Community Plan (August 2020), pp. 3-3, 3-13.
[9] Hollywood Community Plan Update Draft Environmental Impact Report (November 2018), pp. 3-13 – 3-14.

existing conditions surrounding the area, proposed zoning of sites immediately adjacent to the Property, or recently approved development within the vicinity of the Property.

The Property is in the main commercial region of Hollywood and is surrounded by high-density commercial and mixed used developments recently approved with an FAR greater than 2:1 within less of a half mile of the Property. For example, the Columbia Square development, located directly north of the Property, is a one million square foot development with several multi-story buildings to create a mixed-use campus of creative offices, residences, restaurants, and retail establishments. This project features a 21 story, 200-unit residential tower as a focal point for the campus incorporating an FAR of 6:1. The approval of the project allowed the developer to enhance the project site with a variety of amenities and services that cater to the surrounding community and revitalize Hollywood as a tourist destination and economic center while creating an activated pedestrian space. While this site is identified in the CPIO[10] as an area the requires additional research due to recent entitlements that altered the current underlying zoning, the approved development is still within the scale of what the RC1 allows in the immediate vicinity.

In addition, there are six other developments within 2,000 feet of the Property that have been approved through a zone and height change entitlement process since 2016. All these sites are located within the RC1 subarea and have an FAR of 4.5:1 or higher (more than half at FAR 6.0:1). See Figure 4 below.



Figured 4: Recent approved developments within 2,000 feet of the Property with FAR 4.5 and greater.

[10] Draft Hollywood CPIO Concepts and Design Standards (August 2020), p. 21, Figure 4.

Approvals of this kind are indicative of the intended scale of development within the RC1 areas that encourage high-density and transit orientated development. It also signals the City's intent to encourage dense development within this area, and as such the CPIO should be revised to accommodate additional growth without the necessity of a complex entitlement process. As the surrounding area continues to develop with higher commercial and mixed-use density, it makes good planning sense to uniformly regulate sites designated for commercial and mixed uses, especially sites that are adjacent and contiguous to areas proposed for higher density. The proposed changes would provide Home of the Stars with the flexibility to pursue opportunities that integrate a mix of uses and would ensure equitable treatment and redevelopment opportunities across similar lots.

The Property is also designated as Regional Center Commercial under Section 506.2.3 of the Hollywood Redevelopment Plan.[11] In accordance with the Redevelopment Plan, the Property is intended to accommodate a maximum FAR of 6:1. The intent of the assigned FAR is to focus development within the Regional Center Commercial designation to encourage the uniform development of a high-quality commercial, recreational and residential urban environment with an emphasis on entertainment oriented uses.[12] The HCPU2 also specifies that development within the Regional Center Commercial designation shall be focused on areas served by adequate transportation facilities. Further, it shall reinforce the historical development patterns of the area, stimulate appropriate residential housing and provide transitions compatible with adjacent lower density residential neighborhoods.

The current D Limitation and proposed FAR is in contrast to those stated objectives. While increases in FAR have been achieved on an individual development basis within the vicinity, a complex entitlement process is necessary to accomplish this. Further, segmented approvals by disparate property owners are inefficient and the City should utilize this opportunity to adopt smart-growth planning in Hollywood. The adoption of the HCUP2 and CPIO creates an opportunity for the regulations to align with the intent, goals, and vision set forth by not only the HCPU2 , but incorporate the existing development and vision of the commercial regions in Hollywood that are continuing to evolve.

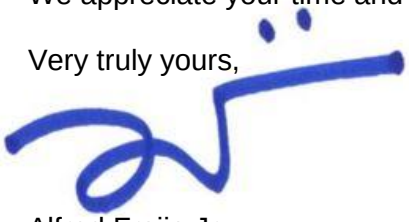
IV. Conclusion

Home of the Stars views these requests as reasonable and squarely within the objectives and policy goals articulated in the HCPU2 and DEIR. Without these revisions, the Property will likely remain "as is" because the entitlements required to maximize the Property's potential would be expensive, time consuming and without guarantee. A potential tenant seeking to develop in the area would overlook the Property for other sites permitting additional FAR. Without incorporating the requested changes, the City could lose a key, transit-oriented parcel in Hollywood that could be activated to the Property's highest and best use.

[11] Ordinance No. 175236, as First Amended on May 20, 2003 (Effective Date: July 12, 2003).
[12] Redevelopment Plan for the Hollywood Redevelopment Project. Sec 506.2.3, p. 28.

We appreciate your time and hope you consider our requested revisions in the final HCPU2.

Very truly yours,



Alfred Fraijo Jr.
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

SMRH:4811-8250-1332.11
RH:
Encls.

City of Los Angeles
Department of City Planning

12/16/2020
PARCEL PROFILE REPORT

PROPERTY ADDRESSES
6108 W SUNSET BLVD
1451 N GOWER ST
6102 W SUNSET BLVD
6100 W SUNSET BLVD
6106 W SUNSET BLVD

ZIP CODES
90028

RECENT ACTIVITY
ENV-2005-5242-MND

CASE NUMBERS
CPC-2018-6005-CA
CPC-2016-1450-CPU
CPC-2013-3169
CPC-2007-5866-SN
CPC-2003-2115-CRA
CPC-2002-4173
CPC-2002-1128-CA
CPC-1999-324-ICO
CPC-1999-2293-ICO
CPC-1986-835-GPC
ORD-181340
ORD-176172
ORD-175038
ORD-173562
ORD-165652-SA280
ORD-129944
ZAI-1977-1098
ZAI-1977-109
ZA-2005-5241-CUB
ZA-1998-202-CUX
PMV-1530
ENV-2019-4121-ND
ENV-2018-6006-CE
ENV-2016-1451-EIR
ENV-2013-3170-CE
ENV-2005-5242-MND
ENV-2003-1377-MND
ENV-2002-1131-ND
ENV-2002-1130-ND
MND-98-36-CUB-ZV
OB-13872
AFF-42027

Address/Legal Information	
PIN Number	147A189 58
Lot/Parcel Area (Calculated)	18,291.8 (sq ft)
Thomas Brothers Grid	PAGE 593 - GRID F4
	PAGE 593 - GRID F5
Assessor Parcel No. (APN)	5546024019
Tract	P M 2550
Map Reference	BK 47-38
Block	None
Lot	A
Arb (Lot Cut Reference)	None
Map Sheet	147A189
Jurisdictional Information	
Community Plan Area	Hollywood
Area Planning Commission	Central
Neighborhood Council	Hollywood Studio District
Council District	CD 13 - Mitch O'Farrell
Census Tract #	1908.01
LADBS District Office	Los Angeles Metro
Planning and Zoning Information	
Special Notes	None
Zoning	C4-2D-SN
Zoning Information (ZI)	ZI-2488 Redevelopment Project Area: Hollywood
	ZI-2374 State Enterprise Zone: Los Angeles
	ZI-2452 Transit Priority Area in the City of Los Angeles
	ZI-2330 Sign District: Hollywood Signage (CRA Area)
	ZI-2331 Sign District: Hollywood Signare (Media District)
	ZI-2277 Redevelopment Project Area: Hollywood (Billboard)
General Plan Land Use	Regional Center Commercial
General Plan Note(s)	Yes
Hillside Area (Zoning Code)	No
Specific Plan Area	None
Subarea	None
Special Land Use / Zoning	None
Historic Preservation Review	No
Historic Preservation Overlay Zone	None
Other Historic Designations	None
Other Historic Survey Information	None
Mills Act Contract	None
CDO: Community Design Overlay	None
CPIO: Community Plan Imp. Overlay	None
Subarea	None
CUGU: Clean Up-Green Up	None
HCR: Hillside Construction Regulation	No
NSO: Neighborhood Stabilization Overlay	No
POD: Pedestrian Oriented Districts	None
RFA: Residential Floor Area District	None

RIO: River Implementation Overlay	No
SN: Sign District	Hollywood Signage (CRA Area)
	Hollywood Signage (Media District)
Streetscape	No
Adaptive Reuse Incentive Area	Adaptive Reuse Incentive Area
Affordable Housing Linkage Fee	
Residential Market Area	Medium-High
Non-Residential Market Area	High
Transit Oriented Communities (TOC)	Tier 3
RPA: Redevelopment Project Area	Hollywood
Central City Parking	No
Downtown Parking	No
Building Line	None
500 Ft School Zone	No
500 Ft Park Zone	No
Assessor Information	
Assessor Parcel No. (APN)	5546024019
APN Area (Co. Public Works)*	1.938 (ac)
Use Code	1500 - Commercial - Shopping Center (Neighborhood, Community) - One Story
Assessed Land Val.	$1,901,349
Assessed Improvement Val.	$2,211,565
Last Owner Change	01/31/2017
Last Sale Amount	$9
Tax Rate Area	200
Deed Ref No. (City Clerk)	5-86
	1945234
	1566558
	1410762
	1410760
Building 1	
Year Built	1978
Number of Units	0
Number of Bedrooms	0
Number of Bathrooms	0
Building Square Footage	41,000.0 (sq ft)
Building 2	
Year Built	1976
Building Class	C7A
Number of Units	0
Number of Bedrooms	0
Number of Bathrooms	0
Building Square Footage	16,520.0 (sq ft)
Building 3	
Year Built	1977
Building Class	C6C
Number of Units	0
Number of Bedrooms	0
Number of Bathrooms	0
Building Square Footage	14,280.0 (sq ft)
Building 4	
Year Built	1978
Building Class	CX
Number of Units	0
Number of Bedrooms	0

Number of Bathrooms	0
Building 5	No data for building 5
Rent Stabilization Ordinance (RSO)	No [APN: 5546024019]
Additional Information	
Airport Hazard	None
Coastal Zone	None
Farmland	Area Not Mapped
Urban Agriculture Incentive Zone	YES
Very High Fire Hazard Severity Zone	No
Fire District No. 1	Yes
Flood Zone	Outside Flood Zone
Watercourse	No
Hazardous Waste / Border Zone Properties	No
Methane Hazard Site	None
High Wind Velocity Areas	No
Special Grading Area (BOE Basic Grid Map A-13372)	No
Wells	None
Seismic Hazards	
Active Fault Near-Source Zone	
Nearest Fault (Distance in km)	1.22267472
Nearest Fault (Name)	Hollywood Fault
Region	Transverse Ranges and Los Angeles Basin
Fault Type	B
Slip Rate (mm/year)	1.00000000
Slip Geometry	Left Lateral - Reverse - Oblique
Slip Type	Poorly Constrained
Down Dip Width (km)	14.00000000
Rupture Top	0.00000000
Rupture Bottom	13.00000000
Dip Angle (degrees)	70.00000000
Maximum Magnitude	6.40000000
Alquist-Priolo Fault Zone	No
Landslide	No
Liquefaction	No
Preliminary Fault Rupture Study Area	No
Tsunami Inundation Zone	No
Economic Development Areas	
Business Improvement District	HOLLYWOOD ENTERTAINMENT DISTRICT
Hubzone	Qualified
Opportunity Zone	Yes
Promise Zone	Los Angeles
State Enterprise Zone	LOS ANGELES STATE ENTERPRISE ZONE
Housing	
Direct all Inquiries to	Housing+Community Investment Department
Telephone	(866) 557-7368
Website	http://hcidla.lacity.org
Rent Stabilization Ordinance (RSO)	No [APN: 5546024019]
Ellis Act Property	No
AB 1482: Tenant Protection Act	No
Public Safety	
Police Information	
Bureau	West
Division / Station	Hollywood
Reporting District	666

Fire Information

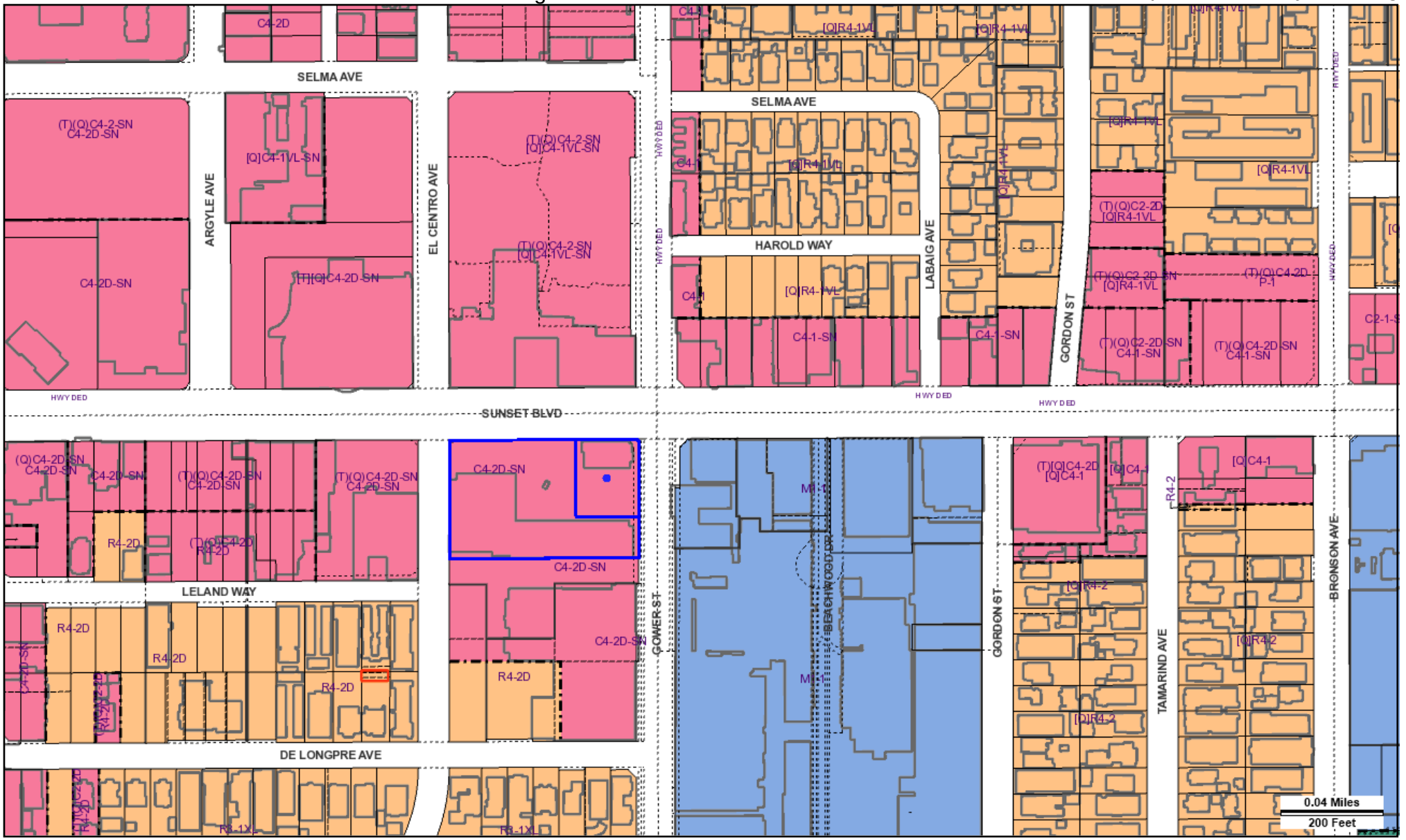
Bureau	West
Batallion	5
District / Fire Station	27
Red Flag Restricted Parking	No

ZIMAS PUBLIC

Generalized Zoning

12/16/2020

City of Los Angeles
Department of City Planning



Address: 6108 W SUNSET BLVD
APN: 5546024019
PIN #: 147A189 58

Tract: P M 2550
Block: None
Lot: A
Arb: None

Zoning: C4-2D-SN
General Plan: Regional Center Commercial

N
W
E
S

LEGEND

GENERALIZED ZONING

- OS, GW
- A, RA
- RE, RS, R1, RU, RZ, RW1
- R2, RD, RMP, RW2, R3, RAS, R4, R5, PVSP
- CR, C1, C1.5, C2, C4, C5, CW, WC, ADP, LASED, CEC, USC, PPSP, MU, NMU
- CM, MR, CCS, UV, UI, UC, M1, M2, LAX, M3, SL, HJ, HR, NI
- P, PB
- PF

GENERAL PLAN LAND USE

LAND USE

RESIDENTIAL

- Minimum Residential
- Very Low / Very Low I Residential
- Very Low II Residential
- Low / Low I Residential
- Low II Residential
- Low Medium / Low Medium I Residential
- Low Medium II Residential
- Medium Residential
- High Medium Residential
- High Density Residential
- Very High Medium Residential

COMMERCIAL

- Limited Commercial
- Limited Commercial - Mixed Medium Residential
- Highway Oriented Commercial
- Highway Oriented and Limited Commercial
- Highway Oriented Commercial - Mixed Medium Residential
- Neighborhood Office Commercial
- Community Commercial
- Community Commercial -Mixed High Residential
- Regional Center Commercial

INDUSTRIAL

- Commercial Manufacturing
- Limited Manufacturing
- Light Manufacturing
- Heavy Manufacturing
- Hybrid Industrial

PARKING

- Parking Buffer

PORT OF LOS ANGELES

- General / Bulk Cargo - Non Hazardous (Industrial / Commercial)
- General / Bulk Cargo - Hazard
- Commercial Fishing
- Recreation and Commercial
- Intermodal Container Transfer Facility Site

LOS ANGELES INTERNATIONAL AIRPORT

- Airport Landside / Airport Landside Support
- Airport Airside
- LAX Airport Northside

OPEN SPACE / PUBLIC FACILITIES

- Open Space
- Public / Open Space
- Public / Quasi-Public Open Space
- Other Public Open Space
- Public Facilities

FRAMEWORK

COMMERCIAL

- Neighborhood Commercial
- General Commercial
- Community Commercial
- Regional Mixed Commercial

INDUSTRIAL

- Limited Industrial
- Light Industrial

CIRCULATION

STREET

- Arterial Mountain Road
- Collector Scenic Street
- Collector Street
- Collector Street (Hillside)
- Collector Street (Modified)
- Collector Street (Proposed)
- Country Road
- Divided Major Highway II
- Divided Secondary Scenic Highway
- Local Scenic Road
- Local Street
- Major Highway (Modified)
- Major Highway I
- Major Highway II
- Major Highway II (Modified)
- Major Scenic Highway
- Major Scenic Highway (Modified)
- Major Scenic Highway II
- Mountain Collector Street
- Park Road
- Parkway
- Principal Major Highway
- Private Street
- Scenic Divided Major Highway II
- Scenic Park
- Scenic Parkway
- Secondary Highway
- Secondary Highway (Modified)
- Secondary Scenic Highway
- Special Collector Street
- Super Major Highway

FREEWAYS

- Freeway
- Interchange
- On-Ramp / Off- Ramp
- Railroad
- Scenic Freeway Highway

MISC. LINES

- Airport Boundary
- Bus Line
- Coastal Zone Boundary
- Coastline Boundary
- Collector Scenic Street (Proposed)
- Commercial Areas
- Commercial Center
- Community Redevelopment Project Area
- Country Road
- DWP Power Lines
- Desirable Open Space
- Detached Single Family House
- Endangered Ridgeline
- Equestrian and/or Hiking Trail
- Hiking Trail
- Historical Preservation
- Horsekeeping Area
- Local Street
- MSA Desirable Open Space
- Major Scenic Controls
- Multi-Purpose Trail
- Natural Resource Reserve
- Park Road
- Park Road (Proposed)
- Quasi-Public
- Rapid Transit Line
- Residential Planned Development
- Scenic Highway (Obsolete)
- Secondary Scenic Controls
- Secondary Scenic Highway (Proposed)
- Site Boundary
- Southern California Edison Power
- Special Study Area
- Specific Plan Area
- Stagecoach Line
- Wildlife Corridor

POINTS OF INTEREST

- Alternative Youth Hostel (Proposed)
- Animal Shelter
- Area Library
- Area Library (Proposed)
- Bridge
- Campground
- Campground (Proposed)
- Cemetery
- HW Church
- City Hall
- Community Center
- Community Library
- Community Library (Proposed Expansion)
- Community Library (Proposed)
- Community Park
- Community Park (Proposed Expansion)
- Community Park (Proposed)
- Community Transit Center
- Convalescent Hospital
- Correctional Facility
- Cultural / Historic Site (Proposed)
- Cultural / Historical Site
- Cultural Arts Center
- DMV DMV Office
- DWP DWP
- DWP Pumping Station
- Equestrian Center
- HQ Fire Department Headquarters
- Fire Station
- Fire Station (Proposed Expansion)
- Fire Station (Proposed)
- Fire Supply & Maintenance
- Fire Training Site
- Fireboat Station
- Health Center / Medical Facility
- Helistop
- Historic Monument
- Historical / Cultural Monument
- Horsekeeping Area
- Horsekeeping Area (Proposed)
- Horticultural Center
- Hospital
- Hospital (Proposed)
- HW House of Worship
- e Important Ecological Area
- e Important Ecological Area (Proposed)
- Interpretive Center (Proposed)
- JC Junior College
- M MTA / Metrolink Station
- M MTA Station
- MTA Stop
- MWD MWD Headquarters
- Maintenance Yard
- Municipal Office Building
- P Municipal Parking lot
- Neighborhood Park
- Neighborhood Park (Proposed Expansion)
- Neighborhood Park (Proposed)
- Oil Collection Center
- P Parking Enforcement
- HQ Police Headquarters
- Police Station
- Police Station (Proposed Expansion)
- Police Station (Proposed)
- Police Training site
- PO Post Office
- Power Distribution Station
- Power Distribution Station (Proposed)
- Power Receiving Station
- Power Receiving Station (Proposed)
- C Private College
- E Private Elementary School
- Private Golf Course
- Private Golf Course (Proposed)
- JH Private Junior High School
- PS Private Pre-School
- Private Recreation & Cultural Facility
- SH Private Senior High School
- SF Private Special School
- E Public Elementary (Proposed Expansion)
- E Public Elementary School
- E Public Elementary School (Proposed)
- Public Golf Course
- Public Golf Course (Proposed)
- Public Housing
- Public Housing (Proposed Expansion)
- JH Public Junior High School
- JH Public Junior High School (Proposed)
- MS Public Middle School
- SH Public Senior High School
- SH Public Senior High School (Proposed)
- Pumping Station
- Pumping Station (Proposed)
- Refuse Collection Center
- Regional Library
- Regional Library (Proposed Expansion)
- Regional Library (Proposed)
- Regional Park
- Regional Park (Proposed)
- RPD Residential Plan Development
- Scenic View Site
- Scenic View Site (Proposed)
- ADM School District Headquarters
- SC School Unspecified Loc/Type (Proposed)
- Skill Center
- SS Social Services
- Special Feature
- Special Recreation (a)
- SF Special School Facility
- SF Special School Facility (Proposed)
- Steam Plant
- sm Surface Mining
- Trail & Assembly Area
- Trail & Assembly Area (Proposed)
- UTL Utility Yard
- Water Tank Reservoir
- Wildlife Migration Corridor
- Wildlife Preserve Gate

SCHOOLS/PARKS WITH 500 FT. BUFFER

- Existing School/Park Site
- Planned School/Park Site
- Inside 500 Ft. Buffer

- Aquatic Facilities
- Beaches
- Child Care Centers
- Dog Parks
- Golf Course
- Historic Sites
- Horticulture/Gardens
- Skate Parks
- Other Facilities
- Park / Recreation Centers
- Parks
- Performing / Visual Arts Centers
- Recreation Centers
- Senior Citizen Centers
- Opportunity School
- Charter School
- Elementary School
- Span School
- Special Education School
- High School
- Middle School
- Early Education Center

COASTAL ZONE

- Coastal Zone Commission Authority
- Calvo Exclusion Area
- Not in Coastal Zone
- Dual Jurisdictional Coastal Zone

TRANSIT ORIENTED COMMUNITIES (TOC)

- Tier 1
- Tier 2
- Tier 3
- Tier 4

Note: TOC Tier designation and map layers are for reference purposes only. Eligible projects shall demonstrate compliance with Tier eligibility standards prior to the issuance of any permits or approvals. As transit service changes, eligible TOC Incentive Areas will be updated.

WAIVER OF DEDICATION OR IMPROVEMENT

- Public Work Approval (PWA)
- Waiver of Dedication or Improvement (WDI)

OTHER SYMBOLS

- Lot Line
- Tract Line
- Lot Cut
- Easement
- Zone Boundary
- Building Line
- Lot Split
- Community Driveway
- Building Outlines 2014
- Building Outlines 2008
- Airport Hazard Zone
- Census Tract
- Coastal Zone
- Council District
- LADBS District Office
- Downtown Parking
- Fault Zone
- Fire District No. 1
- Tract Map
- Parcel Map
- Flood Zone
- Hazardous Waste
- High Wind Zone
- Hillside Grading
- Historic Preservation Overlay Zone
- Specific Plan Area
- Very High Fire Hazard Severity Zone
- Wells

Quetzalli Enrique <quetzalli.enrique@lacity.org>

COMMENTS: Hollywood Community Plan Update 2020

2 messages

'valorie keegan' via Hollywood Plan <hollywoodplan@lacity.org> Wed, Dec 16, 2020 at 3:32 PM
Reply-To: valorie keegan <Rolav1@aol.com>
To: hollywoodplan@lacity.org
Cc: Linda Lou <linda.lou@lacity.org>, "priya.mehendale@lacity.org" <priya.mehendale@lacity.org>, sophia.kim@lacity.org, "kevin.keller@lacity.org" <kevin.keller@lacity.org>

December 16, 2020

City of Los Angeles Department of City Planning
200 N. Spring Street, Room 667 mail stop 395
Los Angeles, CA 90012
Via email & attached pdf-hollywoodplan@lacity.org

Dear City Planners and Staff,

Thank you for the opportunity to provide comments for the Hollywood Community Plan Update. We have previously provided many comments and corrections in writing and via meetings, however many of the public comments, including some factual corrections, do not appear to have been incorporated into the latest plan draft. We hope that you will, at a minimum, review corrections submitted previously and ensure they are incorporated into the final plan text.

We are concerned that the new CPIO fails to include enough Design Standard for Corridors 2 and 5 (Sub Areas 13.6A -14.4) along Sunset Blvd. We brought this up during the recent Office Hours sessions, but want to take this opportunity to provide you with a comprehensive list of recommended Design Standards. We also discussed these suggestions with outgoing CD4 planning director Emma Howard, who was amenable to these suggestions and agreed that more specific guidelines were needed in this area.

Design Standards: Corridor 2 and 5 (Sunset Blvd west of La Brea)

GENERAL

- Prohibit curb-cuts, street widening or parkway removal on any *side street* along Sunset Blvd between La Brea and Marmont Dr.
- Maintain existing parkways. The continual removal of parkways and sidewalks to make streets wider is not in line with the goals of the community or the city's Mobility Element. In addition, removing parkways increases the heat island effect and is counter to Climate Change goals.
- Commercial Corner requirements should be maintained.
- Promote adaptive reuse before demolition. Demolition is a climate change killer, adding to landfill and resulting in the removal of mature trees.

SIDEWALKS

We support walkability as called for in the CPIO, the Mobility Element and the city's Climate Change goals of the city. The plan and CPIO areas call for promoting walking. However, to do this, the plan must provide realistic space and widths for pedestrians of all needs to safely walk.

The plan assumes a sidewalk width along corridors is 15 feet. Sidewalks in CPIO corridors 2 and 5 along Sunset Blvd, west of La Brea *do not* have 15 ft width. Sidewalk widths are very narrow on west portions of Sunset Bl (9'3 and 10ft) La Brea (8ft), Fairfax Ave (5-6ft)

Where sidewalks are not 15ft in width, new developments must have a building setback from the sidewalk to allow for safe pedestrian travel and other infrastructure needs.

PARKING & TRANSPORTATION

Podium parking and roof-top should be prohibited. Podium parking and roof-top parking both produce above-ground exhaust emissions, noise and headlight glare, all of which are disruptive to the community. Podium parking should never be permitted for any development that abuts, is adjacent to, or across the street from any existing residential building where it would be next to bedrooms, kitchens, etc.

The streets in this area are residential with zero buffer between commercial and residential use. Headlight glare, vehicle idling, vehicles turning around, stacked vehicles and valet stations create hazardous conditions and negatively impact quality of life for residents.

Therefore, we recommend creating designated Ride Share and Delivery areas along Sunset Blvd, and not on side streets where pick-ups/drop-offs and deliveries create hazardous conditions for pedestrians, noise and congestion. No Valet set ups, Rideshare Drop-Off/Pick-Up or Delivery trucks should be permitted on any side street along Sunset Blvd between La Brea and Marmont Dr.

We suggest investigating the use of Pay Stations along Sunset Bl CPIO Corridors 2 and 5 in lieu of individual parking meters. This will provide more sidewalk space for pedestrians, landscaping, ride share pick-up/drop-off and deliveries.

Bus stops should always have benches, enough space for waiting and shade trees. Lighting, preferably solar, should be installed near/on bus shelters for safety.

ROOF TOPS

To preserve quality of life and reduce environmental impacts, the following should be *prohibited*:

- Commercial use of rooftops
- Rooftop Parking
- Entertainment, Live Entertainment or music

Roof setbacks should always be provided and any rooftop lighting should be shielded to avoid negative impacts on neighboring residential buildings.

LIGHTING & SIGNAGE

All lighting on new developments should be shielded to avoid negative impacts on residents both within the development and in nearby residential buildings.

We would like to see more pedestrian-level street lighting to make sidewalks safe at night, preferably solar lighting.

Channel box signs or billboards should be prohibited in CPIO corridor 2 and 5 along Sunset Bl between La Brea and Marmont Dr.

The plan should encourage awnings, which were historically a feature of Sunset Bl in this area and provide shade for pedestrians and shoppers.

TREES

Trees must be part of the plan, especially along corridors like Sunset which are currently heat islands with little to no existing shade. Trees are essential; saying “where/when feasible" is not an option. Achieving the Plan’s goals of improved walkability isn’t possible without a commitment to preserving existing trees and adding new trees. We

would like to see a tree plan (tree planting) incorporated in CPIO Corridors 2 and 5 along Sunset Blvd between La Brea and Marmont Dr.

Palm Trees on Sunset Bl are a neighborhood feature and recognizable characteristic of the area. They must be kept and maintained in CPIO Corridors 2 and 5 along Sunset Blvd between La Brea and Marmont Dr.

OUTDOOR DINING

Any and all outdoor dining on the public's right of way must be regularly cleaned by the dining establishment. Any outdoor dining must not infringe on the pedestrian right-of-way. Sidewalk widths must be maintained so that pedestrians are not forced onto the curb and endangered by vehicular traffic.

BALCONIES

Balconies must be set back from building property line and not hang over the sidewalk or pedestrians areas. Balconies should not be constructed with transparent glass. Balconies have a tendency to become storage areas that become outward-facing visual blight.

TRASH

All trash bins must be enclosed and secured and screened from public view.

We appreciate your attention to these proposed Design Standards and hope they will be incorporated into the Plan's CPIO Corridors 2 and 5. We know these guidelines will help the Plan achieve its stated objectives of increasing walkability and reducing climate impacts.

Regards,

Valorie Keegan
Danielle Mead

HCPU Comment Letter 12:16:20.pdf
81K

Quetzalli Enrique <quetzalli.enrique@lacity.org> Wed, Dec 16, 2020 at 4:26 PM
To: valorie keegan <Rolav1@aol.com>
Cc: Hollywood Plan <hollywoodplan@lacity.org>

Hello Valorie,

Thank you for your comment letter. It has been received and filed.

Best,
Quetzalli

LOS ANGELES CITY PLANNING

Quetzalli Enrique
Preferred Pronouns: she, her, hers
Planning Assistant
Los Angeles City Planning
200 N. Spring St., Room 667
Los Angeles, CA 90012
T: (213) 978-1175 | Planning4LA.org
E-NEWS

December 16, 2020

City of Los Angeles Department of City Planning
200 N. Spring Street, Room 667 mail stop 395
Los Angeles, CA 90012
hollywoodplan@lacity.org

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Regards,

Valorie Keegan
Danielle Mead

Quetzalli Enrique <quetzalli.enrique@lacity.org>

Hollywood Community Plan public comment

2 messages

Lindsay Mulcahy <lymulcahy@gmail.com> Wed, Dec 16, 2020 at 12:41 PM
To: hollywoodplan@lacity.org

Dear Planning staff,

As a resident of East Hollywood I am writing to voice my support for the plan amendments issued by the Just Hollywood Coalition. As a student of urban planning, I strongly concur with the arguments outlined in the Just Hollywood plan for higher requirements for affordable housing in new developments and stronger tenant protections to ensure that people currently housed stay so.

I also believe the Community Plan can do more to address the issue of vacancies in Hollywood. A 2020 HCIDLA report and *The Vacancy Report* published by SAJE reveal Hollywood to have one of the highest rates of vacancies in the city. Both reports note the relationship between the proliferation of new, high-end units and vacancies. *The Vacancy Report* further demonstrates a positive correlation between corporate ownership and vacancy in Los Angeles. While many of the policies proposed in *The Vacancy Report* are city-wide, the community plan can and should implement better tracking and enforcement methods to ensure that units do not sit vacant while thousands of residents sleep on the streets.

Moreover, the *Hotel California* report published by UCLA Luskin Center makes a strong case for using hotels as affordable housing. Hollywood already has a wealth of hotels, and faces dual issues of owners evicting tenants to turn apartments into hotels with many new hotel developments. I echo calls to prohibit the conversion of residential units to tourist, and incentivize the use of hotels to become housing.

Thank you for your consideration,

Lindsay Mulcahy

Quetzalli Enrique <quetzalli.enrique@lacity.org> Wed, Dec 16, 2020 at 12:49 PM
To: Lindsay Mulcahy <lymulcahy@gmail.com>
Cc: Hollywood Plan <hollywoodplan@lacity.org>

Hello Lindsay,

Thank you for your email. It has been received and filed.

Best,
Quetzalli

Quetzalli Enrique
Preferred Pronouns: she, her, hers
Planning Assistant
Los Angeles City Planning
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E-NEWS

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Quetzalli Enrique <quetzalli.enrique@lacity.org>

Hollywood Community Plan Comments-K Nakata

2 messages

'KEITH B NAKATA' via Hollywood Plan <hollywoodplan@lacity.org> Wed, Dec 16, 2020 at 3:28 PM
Reply-To: KEITH B NAKATA <keithnakata@mac.com>
To: hollywoodplan@lacity.org
Cc: Daniel Skolnick <daniel.skolnick@lacity.org>

Department of City Planning,

As a long time resident of Hollywood, I am submitting submitting these comments for the record regarding the Hollywood Community Plan Update.

I support "The Just Hollywood Plan" attached below,
as an important roadmap for the Plan which is supported by many significant community groups.

"The Just Hollywood Plan" supports truly affordable housing development while preventing developer giveaways and at the same time supporting historic preservation and in retaining the history rich Hollywood Community Area.

In addition, I have two specific concerns at this time:

1) Properties along Melrose Ave Corridor Subareas between Fairfax Ave. and Highland Ave. being allowed To "provide no additional automotive parking be required when a change of use is made within existing commercial tenant space". This seems to be overly broad in scope in an area of having a traditional lack of available off-street parking options and limited parking for the residents on the streets intersecting Melrose.This could have negative unintended consequences for the residents especially for late night uses along Melrose Ave. The current uncertainty In retail makes this a very risky change without knowing what kind of future uses here make be coming.

2) As a long time resident of this area, an area of concern is along La Cienega Blvd. between Melrose Ave. and Santa Monica Blvd.
This area is known as the La Cienega Design Quarters or “LADQ” which also runs along Melrose Ave.
into West Hollywood. I’ve attached a link to a story about the significance of this street to the interior design
And fashion industries. The storefronts and courtyard layouts are particularly walkable and create an environment conducive
to these important nationally identified industries. It is important to maintain the size and scale of these shops to keep these showrooms in
Los Angeles. More elaborate planning is called for in this area to provide better walkability and streetscape
in the Hollywood Community Plan and zoning to preserve the scale and character of the area going forward,
instead of merely up-zoning the street. The west side of La Cienega is also important to note that there is no
alley buffer behind the buildings and so impacts to the residents of West Hollywood living very close to these buildings
Should be provided protections through setbacks, traditional height, step-backs and facade treatments. Councilmember Koretz of CD5 has been a long time supporter of the LADQ area and of the interior design and fashion industries.

I believe because of it’s location and being on the edge of the Community Plan Area and the City of Los Angeles, Planning
have shortchanged this important commercial area. Please continue working on this street to provide certainty to the businesses
there and protections for the residents there as well.

https://www.wehoville.com/2020/11/16/two-weho-streets-named-as-top-destinations-for-shopping-for-home-decor-items/

Sincerely,

Keith

KEITH NAKATA
keithnakata@mac.com
323.791.1770 cell

justhollywoodplan123.pdf
566K

Quetzalli Enrique <quetzalli.enrique@lacity.org> Wed, Dec 16, 2020 at 4:23 PM
To: KEITH B NAKATA <keithnakata@mac.com>
Cc: Hollywood Plan <hollywoodplan@lacity.org>

Hello Keith,

Thank you for your comments. Your email has been received and filed.

Best,
Quetzalli

Quetzalli Enrique
Preferred Pronouns: she, her, hers
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E-NEWS

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INTEROFFICE MEMORANDUM

TO: LINDA LOU AND THE HOLLYWOOD COMMUNITY PLAN TEAM

FROM: THE JUST HOLLYWOOD COALITION

SUBJECT: JUST HOLLYWOOD PLAN

DATE: DECEMBER 3RD, 2020

On behalf of the Just Hollywood Coalition, comprising several faith, labor, environmental, and tenant organizations (including Coalition for Economic Survival, Thai CDC, ACT-LA, UNITE HERE Local 11, LA Voice, and Food and Water Watch, and Ground Game), we wish to provide our input on the latest iteration of the Hollywood Community Plan. We appreciate the changes made by the Planning Department in the latest draft, including the inclusion of affordability bonuses, plan goals around living wage jobs and local hiring, and the banning of the hotels in certain multifamily areas. However, we urge further changes. The proposed Community Plan will worsen gentrification and the displacement crisis by an upzoning scheme that encourages entirely market-rate or commercial developments in Hollywood Plan Regional Center areas, does not take the steps necessary to stop displacement, and does not sufficiently encourage sustainable development.

Below, summarized by subject, are our suggested changes to the City's proposed plan. These are largely similar to what we have proposed before, with a few new suggestions responding to plan changes like the newly proposed Transfer of Development Rights program. Our plan has been endorsed by several Hollywood area neighborhood councils including Midcity West, Los Feliz, Hollywood United, Hollywood Studio District and East Hollywood Neighborhood Councils. A summary list of policy recommendations can be found on pages 7-9.

<u>NO DEVELOPER GIVEAWAYS, REQUIRE MORE AFFORDABLE HOUSING</u>

In order to encourage affordable housing, Base FAR should be kept the same and affordable housing incentives layered on top to encourage building of affordable housing, rather than granting developers the right to build larger buildings without appropriate affordable housing requirements. Accordingly, we propose the following:

1. Keep the Base FAR the same as it is under current law, incentivizing developers to use CPIO affordable housing bonuses to build affordable housing.
2. Allow increases to FAR in proportion to the amount of affordable housing offered. Suggested amounts are as follows. Note we are not opposed to increasing

the maximum allowable FAR but rather are suggesting that the proposed bonus increases be tied to reasonable and substantial levels of affordable housing, rather than no or low requirements considering the value of the incentives:

   a. Increases to 3 FAR: 10% Extremely Low Income, 14% Very Low, or 23% Lower. (TOC Tier 3- also equivalent to requirements in Corridor 2 for increases to 3:1)
   b. Increase to 3.75 or 4.5 **FAR :** 11% Extremely Low Income, 15% Very Low or 25% Low Income (Roughly Equivalent to existing TOC Tier 4 standards that allow increase to 4.5 FAR**)**
   c. Increase to 6.75 **FAR:** 14% Extremely Low, 18% Very Low. 30% Low

3. For non-residential (including hotel, office, etc) projects that require a zone change to increase the size of the building, require the minimum sustainability findings set out in the next section.

The currently proposed Hollywood Plan increases allowable base FAR and allows even larger buildings with insufficient affordable housing requirements on top of that. For example, the proposed Hollywood Community Plan increases the base allowable FAR by 50% (from 3 to 4.5 in, as an non-exhaustive example subareas 4:2, 4:5J, From 2 to 3 in subarea 2:1B, 4:1G) to as much as 125% (from 2 to 4**.**5 FAR in as an non-exhaustive example subareas 4:5C, parts of 4:5L, 4:5, 4:5D**)** in the Regional Center portion of Hollywood allowing apartments, hotels, offices and other uses without requiring affordable housing or other community benefits. Giveaways like this disincentivize the creation of housing by making our affordable housing bonuses worth less- a developer can build another use like a hotel or offices without providing any community benefits. They also increase the chance that developers will be satisfied with the relatively high FAR offered and build solely market rate housing and not the affordable housing we need. This already happens in Hollywood, as was demonstrated by a recent project **an 185-unit** apartment complex at 1375 **St Andrews Place,** that provided no affordable housing because it did not take advantage of the density bonus law for any additional density of FAR increases but rather simply utilized the substantial FAR of 4.5 already allowed in that area.[1]

The plan's affordable housing requirements are also insufficient. In exchange for a further FAR increase to as high as 6.75 FAR, the plan requires affordable housing set asides no higher than 10% for Extremely Income people. In contrast, in other parts of the plan (roughly La Brea Ave between Hollywood and Fountain, called Corridor 1 in the CPIO map) the affordability requirement is 11% for a FAR increase to 3.75 FAR (around Sunset/La Brea). **Developers in some of the most desirable parts of Hollywood can build market-rate housing or a hotel without providing affordable housing or build nearly double what they are allowed to build elsewhere while providing less**

[1] https://planning.lacity.org/pdiscaseinfo/document/MjIwMzQ10/46e6f77e-051c-4e11-ad6d-6ce8558211cd/pdd

affordable housing. Our proposal would correct these disincentives and require an appropriate level of affordability.

SUSTAINABLE HOLLYWOOD

The current plan does very little to encourage more sustainable development. Santa Monica's successful Downtown Community Plan (see Appendix A for a summary) provides a model of how a City can encourage more sustainable practices. Commercial projects over a certain size are required to work out development agreements with the City that include minimum environmental standards while allowing the City to push for more, including LEED Gold, additional water efficiency and demonstrated transportation plans that reduce vehicle miles traveled.

We propose that projects seeking discretionary increases to FAR in the Hollywood Plan CPIO area (i.e not using the TOC or Community Plan affordable housing programs in order to increase allowable FAR but rather requesting increased FAR through the conditional use process laid out in the CPIO or a zone change) require the City Planning Commission to make the following findings, establishing higher environmental standards:

a. The project encourages the use of non-vehicular forms of transportation through a transportation demand management plan that includes at minimum subsidized transit passes, parking cash-out among mechanisms to ensure project employees use transit rather than cars to go to work.
b. For new buildings energy use will be minimized to the greatest extent feasible, including but not limited to the building achieving LEED Gold certification at minimum and no natural gas infrastructure (for example gas lines or gas stoves) for the project.
c. The project contributes to Los Angeles's sorely neglected urban forest by incorporating trees in the development by preserving existing trees and adding drought-tolerant native street trees on site, in street medians, or on the sidewalk adjacent to their properties and embracing innovative design that include trees- for example "vertical forest" buildings.

WE MUST ENCOURAGE HOMES NOT HOTELS

Los Angeles is undergoing a hotel boom, with more hotel rooms in the pipeline in Los Angeles, even during this pandemic, than any other place in the country[i]. Several projects, past and present in the Hollywood Community Plan area have proposed replacing housing with hotels (see for example: attempts to convert the Villa Carlotta to a hotel). While the proposed plan bans hotels in certain multi-family areas, it would do little to stop the conversion of hotels to housing elsewhere- indeed, by upzoning some existing apartment buildings (for example the rent stabilized building located at 1611 Schrader, which has its base FAR increased from 2:1 to 3:1), it could encourage the replacement of buildings like these with hotels or other commercial uses. We need an upgraded Conditional Use Permit, appealable to City Council that gives the public more

say over hospitality development and clearly requires at very least, housing be replaced when it is demolished for the purposes of hotel conversion. Below is our proposed special conditional use process, based on San Francisco's conditional use permit for hotels[2], with added findings related to small business and protecting existing housing as provided below:

a. The impact of the project and future employees of the hotel or motel on the demand in the plan area for housing, public transit, child-care, and other social services.
b. The measures that will be taken by the project sponsor to employ residents of Hollywood in order to minimize increased demand for transportation
c. The measures that will be taken by the project sponsor, including a transportation demand management plan, to encourage hotel workers and visitors alike to use public transportation, cycling and other non-auto means of transportation.
d. The effect of the project on local small businesses, including if applicable any potential displacement of local small businesses, and any measures by the project sponsor to increase demand for local goods and services
e. There is sufficient market demand for hotels, motels, or transient occupancy residential structures of the type proposed.
The City shall also find:
f. The project will not negatively impact the housing affordable to Angelenos within the plan area and will at very least replace any rent stabilized housing units with affordable units.

Furthermore, the City should make two important changes to appropriately ensure provisions of our code encourage housing, rather than inadvertently encourage hotel use:

(a) Hotels shall be clearly defined as commercial uses.
(b) Hotels shall not be allowed in any project utilizing a density bonus, TOC or CPIO incentive.

The City considers hotels to be "residential uses" thus allowing for projects that include a hotel and a restaurant or other commercial be considered mixed use and exempt it from density restrictions, allowing more hotel rooms on the site when the intent of the ordinance was to encourage mixed use housing projects. Additionally, as demonstrated by an ongoing case at 639 S. La Brea Blvd, where a developer is using the TOC program to increase allowable building size from 1.5 FAR to 4.25 FAR, the transit oriented communities program can be misused to construct a development that provides more hotel rooms than housing[3]. The point of the TOC program was not to allow easy ways for

[2] San Francisco Planning Code, Section 303 (g)

[3] Compare the currently proposed Wilshire / La Brea Project (ZA-2019-1744) using TOC incentives (https://cgistrategies.com/project/la-brea-project/) to the previously proposed density

applicants to sneak larger commercial components like hotels in the program but to create more housing in Los Angeles with an affordable component. Our suggestions would fix these issues.

ENDING DISPLACEMENT, REQUIRING LONGER TERM AFFORDABLE HOUSING

Driven out by increased rents, the Hollywood population dropped by 12,500 between 2000-2010.[4] In the face of the development boom, the Latino population dropped by 17% between 2000-2010, believed to be the largest mass departure from an LA neighborhood in decades.[5] This is not set in stone. We can both encourage affordable housing and stop displacement by doing the following:

1. Require all affordable units to remain affordable for 100 years, rather than the 55 currently required. Alternatively, as in Santa Monica, New York City, and many other cities, require perpetual affordability.[6]
2. In projects that replace existing rent controlled buildings, replacement units should be required in addition to affordable units required under TOC, density bonus, or CPIO affordable housing programs, ensuring that tenants have a place to return to when the new building is constructed and that developers produce an actual increase in affordable housing. Currently, replacement units count toward the affordable housing units required under the TOC, density bonus and proposed Hollywood Plan affordable housing programs. Current policy only requires the replacement of 68% of rent stabilized units destroyed unless the tenants prove that all tenants were low income, information that is often hard to come by.[7] Changing the policy will disincentivize the conversion of rent stabilized buildings and ensure that a net amount of affordable housing is created when RSO buildings are replaced with larger buildings.

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bonus project (CPC-2017-143-DB-MCUP-SPR): https://therealdeal.com/la/2017/01/13/cgi-strategies-plans-160-unit-mixed-use-off-miracle-mile/

[4] Community Plan Area Demographic Profile 2010-2014. <https://planning.lacity.org/complan/CPA_DemographicProfile/2014_HOLLYWOOD.pdf>

[5] https://www.laweekly.com/news/hollywoods-urban-cleansing-2612554

[6] See Chapter 19.22 of the West Hollywood Municipal Code; The Mandatory Inclusionary Housing Program of New York City (https://www1.nyc.gov/site/planning/plans/mih/mandatory-inclusionary-housing.page) which requires perpetual affordability; Cambridge also requires perpetual affordability: https://www.cambridgema.gov/cdd/housing/fordevelopersandpropmanagers/inclusionarydevelopers

[7] http://hcidladev.lacity.org/ab-2222

3. Set an annual cap of demolitions of RSO units in the Community Plan area.
4. An area-wide ban on condo conversions and conversions of RSO units to small lot subdivisions if the vacancy rate is less than 5 percent or there is no accurate estimation of the vacancy rate for the past year, similar to several Bonin-Koretz motions.[8]
5. Update hotel conditional use permit to ban conversions of apartments to hotels or demolition of apartments to build hotels (addressed in above)

PROMOTING HISTORIC PRESERVATION

We appreciate the policies in the plan document to encourage preservation of historic resources, but urge changes to the proposed Transfer of Development Rights Program to preserve public input and prevent conflicts of interest:

1. Transfer of Development Rights should only be allowed between entities that have an arms-length relationship with each other. The current proposal could allow the same property owner to transfer floor area between two properties. This is problematic, because an applicant is using the TDR process with the intent to increase the building size, may, having achieved that, be more apt to neglect the preservation plan at their historic property, despite all efforts of the often understaffed Office of Historic Resources. With two arms-length owners, this concern does not exist to the same extent, because the owner of the historic resource will have the incentive to maintain the property.
2. The Preservation Plan and Transfer of Development Rights should be subject to a public hearing and approval by the Planning Commission (of the TDR) and Cultural Heritage Commission (of the Preservation Plan) so that the preservation community and members of the public have input on the plan. The now defunct CRA/LA Redevelopment Plan allowed for transfer of unused density in order to aid in preserving historic structures, but only with a public hearing before the CRA/LA board and the approval of a development/disposition agreement.

BY RIGHT AFFORDABLE HOUSING

In order to encourage more affordable housing projects, we urge that 100% affordable housing developments in multi-family zones should be:

- Made Exempt from Site Plan Review (currently required for projects of 50 units or more),
- Remove Density limitations (currently no more permissive than 1 unit for every 200 feet of lot area)
- Remove Parking Requirements

[8] See CF-19-1246: https://clkrep.lacity.org/onlinedocs/2019/19-1246_mot_10-15-2019.pdf and CF-17-0480: https://clkrep.lacity.org/onlinedocs/2017/17-0480_mot_05-03-2017.pdf

- Allowed 5 additional incentives (including height increases) through the Administrative Clearance process, rather than the 3 allowed by the current proposal.

As currently proposed, there are either no or limited incentives for affordable housing as most of the Hollywood Community Plan Area is not included in the Community Plan Overlay Subareas, and do not benefit from the Administrative Clearance provisions offered at all. Our suggestions would increase takeup of these incentives.

SUMMARY

1. No Developer Giveaways: Keep Base FAR the same as it is under current law throughout the plan area and require the following affordable housing requirements in Central Hollywood:
    a. For areas with bonus FAR of 3 : 10% Extremely Low Income, 14% Very Low, or 23% Lower. (TOC Tier 3- also equivalent to requirements in Corridor 2 for increases to 3:1)
    b. For areas with bonus FAR to 4.5 **FAR :** 11% Extremely Low Income, 15% Very Low or 25% Low Income (Equivalent to existing TOC Tier 4 standards**)**
    c. For areas with bonus FAR to 6.75 **FAR:** 14% Extremely Low, 18% Very Low. 30% Low
2. Sustainability Standards: For Projects Seeking Discretionary Increases to FAR (i.e not using the TOC or Community Plan affordable housing programs in order to increase allowable FAR but rather requesting a zone change) The City Planning Commission should make the following findings on such projects, establishing higher environmental standards:

a. The project encourages the use of non-vehicular forms of transportation through a transportation demand management plan that includes at minimum subsidized transit passes, parking cash-out among mechanisms to ensure project employees use transit rather than cars to go to work.
b. For new buildings energy use will be minimized to the greatest extent feasible, including but not limited to the building achieving LEED Gold certification at minimum and no natural gas infrastructure (for example gas lines or gas stoves) for the project.
c. The plan contributes to LA's sorely neglected urban forest by incorporating trees in the development by preserving existing trees and adding drought-tolerant native street trees on site, in street medians, or on the sidewalk adjacent to their properties and embracing innovative design that include trees- for example "vertical forest" buildings

3. Clearly Define Hotels as Commercial Not Residential Uses so they do not qualify for any bonuses intended for mixed use housing projects
4. Require a Conditional Use Permit for Hotels, Appealable to Council where the following must be considered:

a. The impact of the project and future employees of the hotel or motel on the demand in the plan area for housing, public transit, child-care, and other social services.

b. The measures that will be taken by the project sponsor to employ residents of Hollywood in order to minimize increased demand for transportation

c. The measures that will be taken by the project sponsor, including a transportation demand management plan, to encourage hotel workers and visitors alike to use public transportation, cycling and other non-auto means of transportation.

d. The effect of the project on local small businesses, including if applicable any potential displacement of local small businesses, and any measures by the project sponsor to increase demand for local goods and services

e. There is sufficient market demand for hotels, motels, or transient occupancy residential structures of the type proposed.

The City shall also find:

f. The project will not negatively impact the housing affordable to Angelenos within the plan area and will at very least replace any rent stabilized housing units with affordable units.

5. <u>Fix the TOC / CPIO Affordable Housing Program</u>
    a. Require all affordable units to remain affordable for 100 years or require perpetual affordability.
    b. In projects that replace existing rent controlled buildings, replacement units should be required in addition to inclusionary units, ensuring that tenants have a place to return to when the new building is constructed and that developers produce an actual increase of affordable housing. Currently, replacement units count toward the affordable housing units required under the TOC, density bonus and proposed Hollywood Plan affordable housing programs. Current policy only requires the replacement of 73% of rent stabilized units destroyed unless the tenants prove that all tenants were low income, information that is often hard to come by. Changing the policy will disincentivize the conversion of rent stabilized buildings and ensure that a net amount of affordable housing is created if they are indeed converted and replaced with larger buildings
    c. No project including a hotel can utilize the TOC, Density Bonus, or CPIO bonuses to increase allowable FAR.
6. <u>Additional Anti-Displacement Measures</u>
    a. Set an annual cap of demolitions of RSO units in the Community Plan area
    b. An area-wide ban on condo conversions and conversions of RSO units to small lot subdivisions if the vacancy rate is less than 5 percent or there is no accurate estimation of the vacancy rate for the past year
    c. Just like the proposed Boyle Heights Community Plan, The Hollywood Plan should include as a community plan program, a citywide ordinance requiring a right to return offered at the same rent or a lower, affordable for their income rent for those displaced.
7. Transfer of Development Rights

1. Transfer of Development Rights should only be allowed between entities that have an arms-length relationship with each other, rather than a company making an agreement with itself to transfer density between two sites it controls.
2. The Preservation Plan and Transfer of Development Rights should be subject to a public hearing and approval by the Planning Commission (of the TDR) and Cultural Heritage Commission (of the Preservation Plan) so that members of the public and particularly the preservation community have input on the plan. The now defunct CRA/LA Redevelopment Plan allowed for transfer of unused floor area to encourage redevelopment but that was subject to a public hearing by the CRA. The same should be done with the TDR program in Hollywood.

8. Allow By Right Affordable Housing in Multi-Family Areas:
    a. Exempt from Site Plan Review (currently required for projects of 50 units or more),
    b. Remove Density limitations (currently no more permissive than 1 unit for every 200 feet of lot area)
    c. Remove Parking Requirements
    d. Allow additional incentives (including height increases) through the Administrative Clearance process, rather than the 3 allowed by the current proposal.

[i] https://www.travelpulse.com/news/hotels-and-resorts/los-angeles-leads-among-us-markets-for-total-hotel-construction-pipelines.html

Appendix A: Santa Monica Community Plan Community Benefit Requirements

Table 2A.3 Community Benefit and Fee Priorities for Development Agreements

LARGE SITES	PREFERRED ON-SITE COMMUNITY BENEFITS
LEED® Certification	Developer should design the Project so that, at a minimum, the Project should achieve LEED® "Platinum" certification under the LEED® Rating System
Affordable Housing	Housing projects should provide substantially more affordable housing units than required for qualified Tier 3 projects by the DCP
Middle-Income Housing	No less than 10% of the units should be available for residents who make 130% - 180% of AMI, provided RHNA obligations have been met.
Local Hiring	Contractors should make a good faith effort to hire qualified individuals who are residents of the City of Santa Monica to comprise not less than 25% of each contractors' total construction workforce
Water Conservation	In addition to water neutrality requirements, developer should achieve a Water Conservation Requirement, defined as (i) fifty percent (50%) below the CALGreen (Title 24) baseline for exterior water use and landscaping, and (ii) thirty percent (30%) below the CALGreen (Title 24) baseline, for interior building water use
Energy Conservation	Developer should install photovoltaic panels on the roof deck of the Project sufficient to generate energy to power the Project's common areas, excluding elevator shafts. The Project should be designed to use and should achieve 15% less energy than required by the California Energy Code.
Transportation Demand Management (TDM) Plan	For employees of the commercial tenants, Developer should achieve an average vehicle ridership (AVR) of 2.2 within two years of Certificate of Occupancy. The 2.2 AVR should continue to be achieved and maintained thereafter. Developer should submit an annual monitoring report on the TDM Plan ("TDM Annual Status Report") starting on the first anniversary of issuance of the project's Certificate of Occupancy
Additional Fees	Transportation Management Organization contribution, Big Blue Bus contribution, Early Childhood Initiatives contribution, Historic Preservation contribution, Water Conservation program contribution

Linda Lou <linda.lou@lacity.org>

Tamarind - Draft Hollywood CPIO Comments - Sherwood, Wiseman, Fang

2 messages

Brian Novak <brian@sherwoodrp.com> Wed, Dec 16, 2020 at 4:59 PM
To: "hollywoodplan@lacity.org" <hollywoodplan@lacity.org>

Dear Hollywood Planning:

On behalf of Sherwood, Wiseman, and Fang, please see attached for our signed letter outlining some concerns with the draft CPIO. The three of us, independently but in aggregate, own in excess of 100,000 land square feet on Tamarind Avenue between Sunset and Fountain. We are eager to provide housing in this exciting area of Hollywood and look forward to continuing our discussion. Please let me know if you have any questions in the meantime.

Thank you very much for your consideration.

Sincerely,

Brian Novak

Sherwood Real Estate Partners

brian@sherwoodrp.com | 310-595-5603

Tamarind Ave_HCPU - CPIO MF2 - Property Owners (12.16.20) .pdf
812K

Linda Lou <linda.lou@lacity.org>
To: Brian Novak <brian@sherwoodrp.com>, Hollywood Plan <hollywoodplan@lacity.org>

Hello Brian,

Thank you for your comment letter. It has been received and filed.

Best,

Linda

Linda Lou
Pronouns: She/Her/Hers
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E-NEWS

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December 16, 2020
Via Electronic Mail

Craig Weber
Priya Mehendale
Department of City Planning
200 N. Spring St.
Los Angeles, CA 90012
Email: craig.weber@lacity.org
Email: priya.mehendale@lacity.org

Re: August 2020 Draft Hollywood CPIO – Tamarind Avenue – MF2

Dear Priya & Craig:

We thank you for this opportunity to address our concerns with the August 2020 Draft Hollywood CPIO ("CPIO"), implementing the pending Hollywood Community Plan Update ("HCPU"). We are three separate owners of property on Tamarind Avenue (the "Corridor") between Sunset Boulevard and Fountain Avenue. In aggregate, we proudly own in excess of 100,000 land square feet on Tamarind Avenue between Sunset Blvd. and Fountain Ave. Our ownership constitutes the majority of developable land along this Corridor designated for up-zoning as a "Housing Opportunity" in the HCPU and "MF2" in the CPIO. As such, we have come together to write this letter outlining the following:

1) Job-rich employment center in need of housing
2) Transit-oriented location and neighborhood walkability
3) Proposed CPIO and impact on ability to provide additional housing

Tamarind Avenue is uniquely located adjacent to two of the major sound stages in Los Angeles – Sunset Gower and Sunset Bronson studios. The immediate area has experienced significant growth and substantial investment in job-producing Class A office space driven by Netflix and other media companies. Notably, Hudson Pacific's 13-story Epic project was recently 100 percent leased to Netflix and is slated to open in 2021. In August 2020, Blackstone, the world's largest investment manager, agreed to develop with Hudson Pacific an additional 1 million square feet of office space adjacent to the studios. When complete, there will be over 3 million square feet of new Class A office and studio space in short walking distance from the Corridor. Together the commitments by Blackstone constitute a $2 billion dollar investment in this neighborhood.

Tamarind Avenue is located less than 500 feet from one of the fastest growing job-creators in Los Angeles with the potential of employing over 5,000 new residents. The Corridor thus provides a tremendous opportunity to provide a mix of market and affordable units in a truly live-work, walkable environment located in one of the fastest growing, most job rich neighborhoods in the City.

Under the proposed CPIO, our ability to provide much-needed housing will be negatively impacted. As currently drafted, under the CPIO, in the best case scenario, no additional housing beyond what the current base zoning allows would be developed along Tamarind Avenue, and potentially less than that. To summarize the CPIO's impact on development in this MF2 area, we have compiled the below example of a hypothetical development consisting of 4 lots (each 6,500 land sq. ft.) totaling 26,000 land sq. ft.

Draft CPIO Impact			
	Existing State Bonus	**Proposed CPIO Bonus**	
Land SF	26,000	26,000	
Base LSF/Dwelling Unit	600	400	
Units	43	65	
State Bonus %	35%	-	
State Bonus Units	17	-	
Total Units w/ Bonus	**60**	**65**	
Affordable Units	**5**	**8**	**60.0% increase in affordable units**
Market Units	**55**	**57**	**3.6% increase in market units**
% Affordable	8.3%	12.3%	
Allowed FAR w/ Bonus	**4.05x**	**3.75x**	**(7.4%) decrease in buildable SF**

As you can see from the above example, the CPIO results in a 60% increase in affordable units and a 3.6% increase in market units. Said differently, of the 5 new units, more than half are designated affordable. Two (2) additional market units would not cover the cost of building three (3) additional affordable units.

Unfortunately, it is highly unlikely that any developer under the new CPIO would use the incentive system proposed. Moreover, the proposed FAR is a reduction of what can currently be achieved utilizing a standard on-menu state density bonus of 35%. The CPIO proposes a 3.75x FAR while the state currently allows 4.05x FAR, on-menu, with additional off-menu capacity.

We believe the minimum incentives necessary to produce the much needed additional housing in this Tier 3 TOC area, is consistent with current Tier 3 TOC standards, which allow for a 70% density and 50% FAR increase resulting in a 4.50x FAR. Unfortunately, the CPIO's reduced incentives would not be useable.

We thank you for your consideration and hope to continue to work with you to find solutions to ensure that the CPIO effectively meets the City's goal of producing more housing in those areas correctly identified for new housing production. We are eager to provide additional housing and look forward to finding a solution that will support this growing and exciting area of Hollywood.

Sincerely,

Brian Novak
Sherwood Real Estate Partners

Michael Cohanzad
Wiseman Residential

Hao Fang

Linda Lou <linda.lou@lacity.org>

Comments on Hollywood CPIO

2 messages

Frances Offenhauser <offenhauser@oma-la.com> Wed, Dec 16, 2020 at 3:41 PM
To: "hollywoodplan@lacity.org" <hollywoodplan@lacity.org>, "linda.lou@lacity.org" <linda.lou@lacity.org>
Cc: Hollywood Heritage Preservation <hollywood.heritage1980@gmail.com>

Hi Linda: We look forward to the opportunity to review our comments with you in detail. Needless to say this is the critical turning point for Hollywood, and we have detailed information we hope can help you update this draft for the CPIO to make a stellar plan.

Fran (310) 656-6600

HPCU and CPIO Commentssent12-16-2020.pdf
1741K

Linda Lou <linda.lou@lacity.org>
To: Frances Offenhauser <offenhauser@oma-la.com>
Cc: "hollywoodplan@lacity.org" <hollywoodplan@lacity.org>, Hollywood Heritage Preservation <hollywood.heritage1980@gmail.com>

Hello Fran,

Thank you for your comment letter. It has been received and filed.

Best,

Linda

Linda Lou
Pronouns: She/Her/Hers
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HOLLYWOOD HERITAGE, INC.
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Hollywood, CA 90078
(323) 874-4005 • FAX (323) 465-5993

Ms. Linda Lou
December 16, 2020

Re: HOLLYWOOD COMMUNITY PLAN UPDATE CPIO

Dear Ms Lou:

Hollywood Heritage is in the process of reviewing both the Hollywood Community Plan Update and the proposed CPIO (Community Plan Implementation Ordinance). This letter principally addresses the Community Plan Implementation Ordinance (CPIO) issued to the public August 2020.

Hollywood's identity is firmly based in its history and historic buildings. Those buildings are our brand, our nationally recognized important cultural monuments, and our foundation for a livable and sustainable City. This Community Plan made a commitment to their preservation. We know what they are, where they are, and what is significant about them. So integrating the known qualities of these landmarks can without question now be the backbone of planning for Hollywood.

Hollywood Heritage reserves the right to re-submit these comments. While the comments are addressing the CPIO, the new versions of the Plan Text and Matrix issued in August 2020 have triggered the need for re-doing all the background analysis of the zoning in the Community Plan Update which led to our EIR comments. As the EIR corrections have not been issued, these changes cause a moving target for substantive comment.

BACKGROUND

DEIR shows proposed Plan has significant and unavoidable adverse effects: The Draft EIR for the proposed Hollywood Community Plan reported the City's belief that their Plan released in 2018 will significantly adversely affect historic resources. HHI knows this is unacceptable-- but at the moment agrees that this is probably accurate. It is preventable—there is no overriding consideration that is not resolvable.,

Although the 2018-2020 Plan and DEIR offered no underlying analysis and no map to reveal the problems created by the Plan, when this same Plan was issued in the run-up to 2012, City Planning did release maps

--illustrating the across-the-board upzoning. Our sampling and mapping found upzoning in most of the Plan, and especially in historic districts, directly threatening well over 50% of landmarks.

Of all the Hollywood Community Plan documents, what ultimately gets adopted and acted upon is the "Land Use Plan" and "Matrix" (proposed zoning). These are the real Plan-- adopted by the City Council as multiple new zoning ordinances. The upzoning proposed and the "overzoning" already in the 1988 Plan is a tsunami for historic Hollywood. It causes existing historic buildings to be demolished; land to be more expensive; neighborhoods and districts to lose cohesiveness, historic character, and livability; and pressures to compensate for higher land values through building height and density—meaning doubling and tripling construction costs that make housing un-affordable. The Community Plan to date is a Blueprint for Loss, offering upzoning unsupported by credible analysis, and offering no substantive tools—or even including current tools—to mitigate this giant loss.

If the unstated intent of the CPIO is to somehow supplant the obligations the City has assumed in the transfer from the Community Redevelopment Agency-- the CPIO as drafted does not do that.

IS THE CPIO THE ONE SUFFICENT PRESERVATION TOOL? This CPIO is the first and only provision we see as part of this Community Plan that integrates historic buildings into the Plan or Planning—otherwise historic preservation features high in "goals" and "policies", but with the actual planning it is sadly in stark conflict.

The CPIO has 3 goals—one is to "Preserve Historic Resources." The CPIO is the single zoning action in the HPCU to implement a commitment to historic preservation and to enable a conclusion of "no significant adverse effect" of the proposed Plan. Thus all must evaluate the CPIO rigorously. To date it appears that the CPIO does not effectively change the dire environmental effect.

In Attachment #1 Hollywood Heritage includes a listing of what documents we have found and reviewed pertinent to the Hollywood CPIO, and what comments HHI has submitted over time regarding historic buildings and the Hollywood Community Plan.

DOES THE CPIO DELIVER?

1. Is the CPIO the mitigation for historic buildings which will reverse the proposed 2020 Land Use Plan's significant adverse effects? **No.**
   - **CPIO fails to apply to whole Redevelopment Area:** The CPIO was initially proposed to apply to the overall Redevelopment Area, and was shown on every parcel at the time of the EIR being issued. It was expected to embody ALL aspects of the Redevelopment Plan which relate to historic structures- alterations, additions, new construction, demolitions.. But currently (see Map #1) the CPIO applies to just a portion of the Redevelopment Area, which itself was a central portion of the overall Community Plan Area. This means that historic resources in the Redevelopment boundary but beyond the CPIO are left with unclarified status, inadequate public notification, and no protection.
   - **CPIO applies to "projects" with "permits"- should be explicit that it applies also to entitlements and EIRs:** The CPIO defines "Project" as "Any activity that requires the issuance of a building, grading, demolition, or change of use permit, unless the activity consists solely of interior rehabilitation/repair work." To make this clear, it will be better when the CPIO clearly governs for any entitlement discretionary actions, EIRs, etc

- **CPIO is not an "implementation" overlay; it is a mix of re-zoning (upzoning) with relaxing review and protections on historic buildings**: The Community Plan involves new upzoning in an estimated 69 subareas, on top of the "over zoning" conflicts carried over from 1988. The CPIO "tools" then add more upzoning in the form of "incentives" for affordable housing. Upzoning and density incentives are conflict-filled tools in mature urban areas. They promote abandonment, lack of maintenance, and speculation, delivering disinvestment to neighborhoods. These should not be applied in historic areas. The Community Plan Update zoning is almost exclusively growth-inducing demolition-promoting upzoning. To date the calculations justifying any of this have not been made public, not the impact of piling incentives on to upzoning.
- **CPIO is vague, lacking rigor, conflicting, and misleading**: The CPIO purports to be an implementation plan for preservation, but fails to utilize or mention the current laws, standards, OHR procedures and Ordinances, surveys, and extensive scholarly data that must underpin this Overlay. For example, the National Register Historic District—listed at the national level of significance by the Federal government, is mapped wrong—at roughly 1/3-1/4 its actual size. The District qualifies as a "designated" historic resource, but on Page 29 and 30 design standards for it fail to mention the existing Federal applicable Standards (and Preservation Brief #14) that are the standard of review, being applied and reviewed by OHR. This District is omitted from the Preservation Chapter of the Community Plan. The necessity of a Hollywood Boulevard Urban Design Plan—a Plan for land use, transportation, alterations review, etc in the historic district and the areas surrounding it, is omitted. After the CRA has spent $1 mil or more studying this area and its urban design needs—it goes unmentioned.
- **No specific historic preservation in Community Plan Update outside of CPIO:** The Community Plan is effectively silent on any planning for preservation or historic preservation treatment for the buildings/districts identified by SurveyLA outside of CPIO and CRA boundaries. Desirable activities in the Community Plan Implementation chapter (Ch 7) of the Plan Text are not a part of the Community Plan Ordinances.

2. Does the CPIO carefully carry over all the protections in place for the last 30+ years? Is it sufficient to replace Redevelopment Plan protections? **No**

- **CPIO makes efforts for historic design review, demolition review, TDRs, and protection for "Character Residential Areas" (**Hollywood Core Transition District/National Register and SurveyLA historic districts) The CPIO offers some well-considered protocols for reviewing projects affecting historic buildings, and referring to the Office of Historic Resources for expert review. As noted below, this is not new--these processes are already in place for "designated" resources. The new "Development Standards" attempt to encapsulate character-defining features—Hollywood Heritage will provide a page by page mark up of these.
- **CPIO creates "second class" historic resources:** Prior to this Community Plan Update, the City's historic building protections have been conducted by the Office of Historic Resources, covering alteration permits for approximately 281 of the landmarks in the Community Plan area (63 inside the Redevelopment Area). The CPIO calls these "designated resources". The CPIO continues the same procedures and reviews and delay of demolition, BUT 3 "downgrades" are entwined in the CPIO.
  1. SurveyLA properties: Properties identified by SurveyLA as historic are treated differently from the designated landmarks—as "eligible" rather than "designated" resources, thus with lower protections and no OHR formal process.. This may

be in response to lawsuits, so every effort should be made to clarify why this is proposed and to have the Survey accepted

2. 511 List properties: More importantly, over 3 decades of solid work in 4 surveys and the Redevelopment Plan EIR have identified over 1,000 potentially significant properties for the 511 list of the Community Redevelopment Agency, pursuant to extensive preservation responsibilities transferred from the City of Los Angeles to CRA in 1988. These have been vetted multiple times, as times and knowledge changes. Most recently CRA transferred the "ARG Survey" to the City, and Hollywood Heritage has developed the " 511 list." Classed by the CPIO as "eligible" resources, this is a "downgrade" from the status and protections under the Redevelopment Plan, and currently all "5's" are omitted.
3. National Register individually listed and District properties should be protected (see below) under the "delay of demolition" procedures built into the Redevelopment Plan. CPIO omits this.

- **CPIO wrongly downgrades to "third class" important buildings in historic districts**: The CPIO on Pages 5 and 6 downgrades Historic District buildings named "non-contributors". We argue that these must be identified in the Community Plan and trigger review in the CPIO. These buildings do in fact contribute to the overall District in style, massing, urban design etc,-- so much so that they were included within the District boundaries. (Perhaps due to alterations they were at the time not counted as contributors, but this may not be the case now, and an "automatic" removal potentially damages a district.)
- **Removing and replacing altered contributors and non-contributors does effect an historic district,** because District boundaries were vetted and specifically established due to cohesion, context, and period of significance. A detailed analysis of this is given in Attachment # 4. State case law has clarified the importance and the necessity of environmental review for new buildings in historic districts; Federal procedures guide their evaluation and treatment. Hollywood should not be shortchanged to have less consideration than "non-contributors" and "altered contributors" in HPOZ's. The CPIO does try to resolve this with design standards applied regardless of location, but that isn't precise enough for historic districts,
- **CPIO fails to identify, map, and protect commercial historic district buildings, especially Hollywood Boulevard, and industrial buildings.** The CPIO purports to support districts like Hollywood Boulevard with "contextual incentives" and "design requirements" (Page 4). It purports to add no new height incentives to the National Register District along Hollywood Boulevard, but erroneously depicts the National Register District as subarea RC3, a part of the whole. This must be seen against a backdrop of upzoning and areas already with unlimited or very high heights—incentivization to demolish and replace with new buildings. Critical identification and protection of historic buildings in commercial and industrial zones is missing.
- **CPIO misses protections for the Franklin Avenue Design District**: Historic areas and landmarks between Franklin Avenue and Hollywood Boulevard are treated as incentive areas for demolition, without recognition of the needs for preservation and special design quality.
- **CPIO fails to mention or carry over protections of historic resources from Redevelopment Area and prior Community Plan:** Hollywood Heritage expected that carryover of CRA historic protections would be throughout the Redevelopment Area. Appendix #2 shows those protections. These must of course carry into the 2020 Plan—but the CPIO omits them. One prominent example—the Redevelopment Plan extends the 180 day/360day delay of demolition afforded to Los Angeles Historic Cultural

Monuments to buildings on the 511 List (status codes 1-4 at one time). The current Community Plan (1988) has a consistent rationale for historic buildings which integrated CRA's obligations--including Transfer of Development Rights, Hollywood Boulevard Urban Design Plan, etc—with City Planning.

- **CPIO cannot can "clear" environmental review in advance**—Chapter 1_Page 5 and 6 states_that demolitions of "non-contributors" in historic districts AND the new construction if compatible with contributing buildings and meeting the Secretary of the Interior Standards "is not an impact to a historical resource.". This "preapproval" violates CEQA—these non-contributors have not been reevaluated in 30 years; re-assessment cannot be cut off. And District compatibility must require review by OHR. See Attachment #4.

Is there a more robust and effective approach? Yes

- **Better land use/zoning tools are possible besides upzoning and incentivizing demolition**: Planning for a built-out historic area recognizes the existence and size and scale of existing historic buildings, and uses up-to-date tools to densify—if that it the goal, True protections include some which are already in practice (in lieu parking for changes of use rather than new parking) and some are in the CPIO (such as in the Character Residential Areas and in TDRs). But many are not--acceptance of non-conforming uses and density for re-use of historic buildings; promoting conversion of commercial buildings to residential (such as the Adaptive Reuse Ordinance); increasing density and incentives ONLY within existing building envelopes and compatible additions; converting lower density buildings to multifamily units or hotels; or adding appropriate wings or "back houses". These and other tools allow new housing units with no loss of the historic building, its sustainability, and the urban fabric.
- **Do not purposefully pit preservation against affordable housing:** Incentives for higher density which trigger demolition or inappropriate gigantification in historic districts should not be a part of this CPIO. Discretionary actions in Hollywood over the last 10+ years have been massive entitlement "giveaways" , exceeding densities in both the 1988 Plan and this new upzoned Plan, but never required affordable housing or public benefits. This CPIO cannot load the genuine affordable housing need on to fragile historic areas—after the City pushed through maybe 7,000 units of unaffordable housing in central Hollywood, and stood by while massive amounts of older serviceable housing was demolished.
- **Prohibition on demolition:** The most economically successful downtowns have profited greatly from outright prohibitions of historic resources. Investment can pour into existing buildings, adaptive re-use, etc. Matched with municipal bridge loans for developers restoring historic buildings, validated parking and resolved traffic issues, re-use of upper floors, and coordinated marketing the historic buildings offer a springboard for renaissance in Hollywood.

6 KEY ELEMENTS FOR PRESERVATION PLANNING IN THE CPIO: Hollywood Heritage has divided our comments in this letter into 6 categories—using the basic concepts of Preservation Planning.

1. **Identification** of individual historic buildings and historic districts: Is identification clear and complete? Is it readily publicly available and understandable? Is there a clear "context statement"—this is a scholarly weaving together of the narrative history of Hollywood and the buildings which are significant to interpreting that history? Are the

statuses clear—National Register, California Register, Los Angeles, Redevelopment Area 511 List.

2. **Mapping** of individual historic buildings and historic districts: In integrating historic buildings into Land Use and related Plan Elements, are the locations, densities, heights, urban design characteristics of the buildings and districts mapped clearly and accurately?
3. **Land Use Planning:** Integration of preservation planning into land use planning: As preservation is a stated goal of the Plan and CPIO, have the historic areas been integrated into Land Use and Zoning recommendations? How? Where? With special zoning to prohibit demolition? With down-zoning to remove the incentive to demolish?? With compensations such as a clear TDR system and special design guidance built into the zoning to re-use existing historic buildings?
4. **Treatment of historic buildings:** means "how will maintenance, alterations, additions, and new infill buildings be designed, and who are the experts who determine whether standards are being followed?" What must be submitted for design review and when? Los Angeles policy in the Conservation Element applies the Secretary of the Interior Standards for Rehabilitation as the "treatment standards". For HCM's the Office of Historic Resources makes this determination, and for HPOZ's in Los Angeles new buildings in historic districts must be also evaluated by OHR.
5. **Implementation – carryover of current rules in 1988 plan, redevelopment plan:** What are the current protections in the 1988 Community Plan? What are the current protections in the Redevelopment Plan? (See Attachment #3). Are they carried forward?
6. **Environmental Impact:** Is the CPIO accompanied by environmental review?

DOES THE CPIO SUCCEED IN THE 6 ELEMENTS OF PRESERVATION PLANNING?

Hollywood Heritage's preliminary review of CPIO: The Draft CPIO states on Page 2 that Historic Preservation is one of its 3 goals, and on Page 5 lists the "intent" to "establish review procedures for projects involving designated and certain eligible historic resources. Establishing such procedures will provide opportunities for the identification and consideration of preservation alternatives." (It is hoped that this last phrase means "alternative ways to preserve"!)

		Does the CPIO adequately cover these?	Actions
I	**Identification/ Listing** of individual historic resources and historic districts	**HPCU and CPIO must be consistent and coordinated** in identifying and mapping the established status of historic buildings. Historic buildings are not enumerated in the CPIO, so it is critical that they are correctly identified in the HPCU—especially Appendix L. Our organization responded previously that the lists in the HPCU are incorrect, incomplete and out of date.. Attachment #3 to this letter goes into greater detail, and Attachment #4 is the correct list. **How identified:** The CPIO distinguishes between two types of historic resources (Page 91): • "Designated Historic Resource: A building, structure, object, landscaping element, or natural feature listed or designated as a historical resource, either individually, or as a contributor to a district at the local, state, or national level." • This means buildings listed locally as HCMS or in HPOZs; on the California Register (such as Afton Sq district); and on the	Some corrections needed HPCU EIR lists etc that must be updated/revised. HHI has prepared a complete and vetted compendium of lists Director should accept as

		National Register—as individual properties or as districts. The CPIO definition of "designated" excludes non-contributors to listed historic districts. • "Eligible Historic Resource": Includes all of the above, plus sites ""as a contributor to a historic district under a local, state, or Federal designation program through SurveyLA…or another historic resource survey completed by a person meeting the Secretary of the Interior's Professional Qualification Standards for Historic Preservation and accepted as complete by the Director, in consultation with the Office of Historic Resources This term does not include a non-contributor to an eligible historic district." • This definition covers the high concentration of historic buildings in central Hollywood identified by the Community Redevelopment Agency—known as the "511 List" or the "ARG Survey"	complete the ARG survey, with revisions per HHI peer review, prior to adoption of this HPCU, or change this language. CPIO should have precise data for historic resources, or precise references to where to find it.
		Extent of CPIO: (Page 3 of CPIO*)* The CPIO was promised to cover the entire Redevelopment Area—it does not. See Map #2 (Attachment 2)	Extend the CPIO to the entire Redevelopment Area
		Public information on resource identification: Three decades of work by experts means there is clear information on what the historic buildings and Districts are; why they are significant; what status level is assigned to them; where they are; and even what features of buildings and districts define their character. • Today, City Planning has much of the needed information uploaded on websites—but not all in one place or consistently. • The Hollywood Community Plan and EIR were prepared and issued without the benefit of SurveyLA and the CRA Sec 511 inventory. • CPIO states that there would be review from OHR on historic district infill but there is nothing to alert potential land buyer that there are restrictions to new infill unless the sites are identified. • ZI 2488 the current solution to the inconsistencies in City data • **ZIMAS :** Non-contributors are not identified in Zimas –some are in NavigateLA—which is generally more accurate.	HHI has prepared reviews of the inconsistencies and omissions of current websites. This is a separate topic we are glad to discuss
		Include District Non-Contributors - See discussion in Attachment 4. District non-contributors are a part of historic districts—they met the qualifications to be included in the District boundary. Detrimental effects can come from removal of these without sufficient research, especially in Hollywood; to the District as a whole from their removal; from replacement with infill that does not comply with the Secretary of the Interior Standards, and specifically Preservation Brief #14	Include non-contributors as identified resources
		Context statement for Hollywood missing: Community Plan Chapter 5 offers a partial narrative history. What is fundamental for planning is known as a "context statement". This was required as a part of CRA's responsibilities to date their work is incomplete. A "context	Community Plan Chapter 5 should have Hollywood

		statement" "connects" the narrative and chronological history to the extant building types, their locations, the relation of style to use and type, etc., etc—as an essential and tailored foundation for deciding which buildings have cultural or architectural significance	Context Statement
2	**Mapping** of individual historic resources and historic districts:	• **Maps found** on page 3,69,77, and78 CPIO • **Boundaries of historic districts**: Some precise boundary mapping errors • **Missing historic districts**: See Map #1 and 2 • Clarity is missing on districts established under the National Register and California Register, and what regulations they fall under regulations	Some adjustments needed Hollywood Heritage has mapped all this is GIS format and can share
3	**Land Use Planning:** Integrate preservation into Land Use Map and Matrix	**Community Plan and CPIO-- preservation not integrated into land use planning** --Land Use Plan (proposed zoning) is antithetic to preservation. CPIO affordable housing incentives are a form of upzoning, but with restrictions applied after-the-fact: • Result #1--Promotes demolition of historic buildings- must be corrected: CPIO "incentives" added on top on upzoning. Historic areas can and should be protected—they are only a fraction of the Community Plan area. (Afton, Selma La Baig etc need incentives removed unless following "better alternatives" below") • Result #2: Promotes density and land price inflation, and then clamps down later with design review and then stop them once they submit for a permit". • CPIO attempts to clamp down to force compatibility- but without showing area-specific templates which provide an understanding of the effect of incentives, the CPIO cannot be evaluated	**No**
		Historic areas should be mapped overlain on Land Use Maps" • Incentive areas in CPIO overlay on Land Use Map • Upzoning in Community Plan Update maps overlay on historic buildings and districts. • "Overzoning" in historic areas left over from 1988 Plan	Provide clear overlays
		Better alternatives to upzoning: • re-use pre-approval and parking waivers to increase affordable housing without removing historic structures--converting disused commercial upper floors to residential; creative and proven methods for adding back wings without touching street-front facades; changes of use and occupancy without code upgrades; extension of Adaptive ReUse Ordinance to Hollywood • Remove affordable housing densification incentives in historic areas	Develop practical alternatives to upzoning and incentives
		CPIO misses protections for the Franklin Avenue Design District: Historic areas and landmarks between Franklin Avenue and Hollywood Boulevard are treated as incentive areas for demolition, without recognition of the needs for preservation and special design quality as clearly shown in ARG study and Redevelopment Plan	Special study required
		Transfer of Development Rights: The CPIO has a draft proposal for a TDR program, but 3 vital ingredients are missing:	HHI is continuing to analyze

		1. Mapping of where receiver sites may be so not to cause further damage to historic districts; 2. A mathematical/ economic analysis of what transferrable rights are pragmatic and realistic, given the high density zoning already on small parcels, and should be assigned to historic buildings to help them economically; and 3. requirement that discretionary entitlements seeking added FAR purchase transferred rights, rather than have them "gifted" for no public benefit as happens regularly today. A fairer and more successful system would give excess FAR to historic buildings specifically only for TDR transfer, and would reduce densities elsewhere. To date the approach to "incentives" and upzoning unfairly treats historic property owners. A TDR process—applied with knowledgeable economic underpinnings—could correct that.	
4	**Treatment** of historic buildings and design review	**CPIO does not propose changes to current treatment for "designated" City historic buildings-** Permits are reviewed by the Office of Historic Resources • Local Cultural Heritage Monuments: provides identification; protection via alteration reviews and 1 year delay of demolition. Review is by OHR • Local Historic Preservation Overlay Zones: (all in Hollywood's residential areas): provides identification; requires alteration reviews and new infill building conformance. Review is by Planning, HPOZ Board advice; OHR. • California and National Register-designated buildings-—unclear process- OHR has stated in meetings and in transfer documents that these properties are flagged and reviewed.	HHI reviewing CPIO in detail- may have additional comments
		CPIO unclear about "designated" resources" in entitlements: Design review and CEQA review for projects asking for entitlements which exceed current zoning and may affect historic buildings.	
		CPIO proposes different treatment for surveyed resources in Redevelopment Area, and Survey LA • Alterations and additions (Page 5, 6 and 7 of CPIO) • New construction in historic districts: (Page 73, 80, 81, and 82 of the CPIO) CPIO proposes using height and setbacks of adjacent buildings to guide infill in Character Residential areas. A better approach is synthesizing the urban patterning characteristics and being compatible. Some districts aren't entirely uniform.	
		Non-contributors: See above and Attachment #4	
		CPIO Development Standards-- Standards (for example on page 29-30) cannot be applied to historic buildings with analysis first of conformance with Secretary of the Interior Standards . Regulating the "pedestrian experience" is a highly worthy starting point, but in historic areas the design must be more specifically tailored to the existing types and styles of buildings—not as if all is new. The brevity of the development standards is misleading—they don't deal with alterations, additions etc in a manner conforming to the Secretary of the interior Standards—they seem to be aimed at new construction.	HHI will provide mark up of Development Standards
5	**Implement-ation: carry-over of**	**CPIO must carry over all Redevelopment Plan planning obligations, or those requirements will stay in effect from the Redevelopment Plan.**	CPIO does not carry these plans over- thus

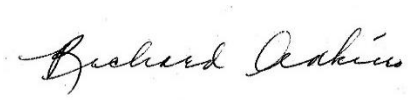
	protections from the Hollywood Redevelopment Plan**:**	• **Attachment #3** contains excerpts from the Redevelopment Plan which transferred to the City of Los Angeles. The following are selections from it- preservation planning essentials which the CPIO was required to pick up—or the requirements remain to be met under separate reviews and approvals under the Redevelopment Plan • **Sec 409.1 Rehabilitation and Conservation:** It shall be the purpose of this Plan to encourage the retention of existing structures by a program of conservation and rehabilitation when consistent with the provisions of this Plan. All rehabilitation undertaken in the Project Area shall conform to such rehabilitation standards. The rehabilitation of buildings determined by the Agency to be of architectural and/or historical significance shall be rehabilitated in accordance with the "Secretary of the Interior's Standards for Rehabilitation". • **Sec 502,2 -- Franklin Avenue Design District Plan:** "a detailed design plan …which addresses preservation of architecturally and historically significant buildings, parking, circulation, views…" • **Sec 506.2.1 Hollywood Boulevard Urban Design Plan:** "urban design plan including design guidelines and criteria and a parking and circulation program to meet these objectives.. All new development in the District shall meet the design guidelines..may include a reduction of density" The objectives of the District are to: 1) Encourage preservation, restoration and appropriate reuse of historically or architecturally significant structures; 2) Assure that new development is sympathetic to and complements the existing scale of development; 3) Provide pedestrian oriented retail uses along the street level; 4) Encourage entertainment, theater and tourist related uses; 5) Provide adequate parking for new and existing uses; and 6) Reinforce and enhance the existing pedestrian environment. The Design(s) for Development may include a reduction of density by up to 33% in certain areas to insure that the objectives of the District are met. • **Sec 518.2 refers to Hollywood Boulevard Urban Design Plan** "An urban design plan for Hollywood Boulevard will be prepared pursuant to Section 506.2.1 of this Plan. This Plan will include a strategy to address the long-term parking needs of Hollywood Boulevard. Pursuant to Section 506.2.3 of this Plan the Agency shall monitor the off-street parking supply within the Regional Center Commercial Designation. " • **Section 505 "Residential Uses" ::** "Within portions of the Project Area designated for residential use there are clusters of single family homes and architecturally and/or historically significant buildings or groups of buildings. There is also a need for additional parking. Therefore, in order to enhance the environmental quality of residential areas Design(s) for Development may be adopted to: 1) Ensure that the scale, density, bulk and general architectural style of new development is compatible with the architectural and/or historical features of a neighborhood; 2) Reduce the permitted density of an area below that density otherwise permitted in order to preserve clusters of houses; and 3) Ensure that an appropriate amount of parking is provided for residents of the area.	they remain as a part of the Redevelopment Unit plan and entitlement review obligations**.**

		• **Hollywood Core Transition District Plan (aka Sunset District Plan) : (Sec 506.2.2)** "Properties designated on the Redevelopment Plan Map as "Hollywood Core Transition District" shall be given special consideration due to the low density of the adjacent residential areas. The objective of this District is to provide for a transition in the scale and intensity of development between Regional Center Commercial uses and residential neighborhoods. The Agency shall review all permits in this District to ensure that circulation patterns, landscaping, parking, and the scale of new construction is not detrimental to the adjacent residential neighborhoods."	
	Implementa-tion- Carryover of protections	• **Community Plan Protections** : The 1988 Community Plan included as an integral part the Redevelopment Plan requirements for TDRs, proactive listing of identified buildings as HCMs and HPOZs, and Specific Plans (noted immediately above) to protect identified historic planning areas, design guidelines, and commercial overlay zones should be the tools used to mitigate substantial adverse effect on historic resources. • **Federal listing protections**	
6	**EIR**	• **CEQA review of CPIO ("Implementation Overlay") is required:** The effect of density incentives on all the integrated parts of the Community Plan—population and demographics, utilities, parks and open space, transportation, utilities, etc—must be analyzed under CEQA. The current DEIR did not anticipate this—in fact, even if this CPIO is presented as a substitute for the TOC regulations in the Zoning Code, those had no environmental review, and exceeded the authority of the vote under which they were initiated. That is no substitution or excuse for skipping CEQA review.	CEQA review of effects of CPIO is required
		• **CEQA cannot be compromised** by a CPIO announcing in advance that a project has no adverse effect	
		• **Mitigations required**: The General Plan Framework acknowledges that "Significant effects to cultural resources in each CPA would occur if population increases in areas of historic districts and historic sites." This is such a case. The Framework directs mitigations so that this impact does not occur, but the CPIO does not yet deliver. Similarly, the Redevelopment Plan EIR required an extensive list of land use actions (see Attachment #3 and the Redevelopment plan EIR) which the City must apply now that CRA obligations have transferred to the City. • **Removing altered contributors and non-contributors does effect an historic district**, because District boundaries were established including the altered contributors and non-contributors, with a designated and approved composition. Altering that composition may be an adverse effect.	

In Attachment #1 Hollywood Heritage includes a listing of what documents we have found and reviewed pertinent to the Hollywood CPIO, and what comments HHI has submitted over time regarding historic buildings and the Hollywood Community Plan.

About Hollywood Heritage, Inc. For over 35 years, Hollywood Heritage has been an advocate of the preservation and protection of Hollywood's historic resources. We support the goal of preserving what is most significant in Hollywood, while encouraging responsible new and infill development. Our organization has nominated many of the current Historic Cultural Monuments, listed the Hollywood Boulevard Commercial and Entertainment District in the National Register of Historic Places at the national level of significance, provided technical assistance to developers and owners of significant properties, and participated in cooperation with City Planning on public policy discussions, including the formulation of the Hollywood Redevelopment Plan of 1986, improvements of preservation language in former Community Plans, and subsequent urban design plans. These efforts have resulted in the rehabilitation of significant landmarks and districts in Hollywood.

Sincerely,



President, Hollywood heritage

ATTACHMENT #1

PRIOR INPUT FROM HOLLYWOOD HERITAGE

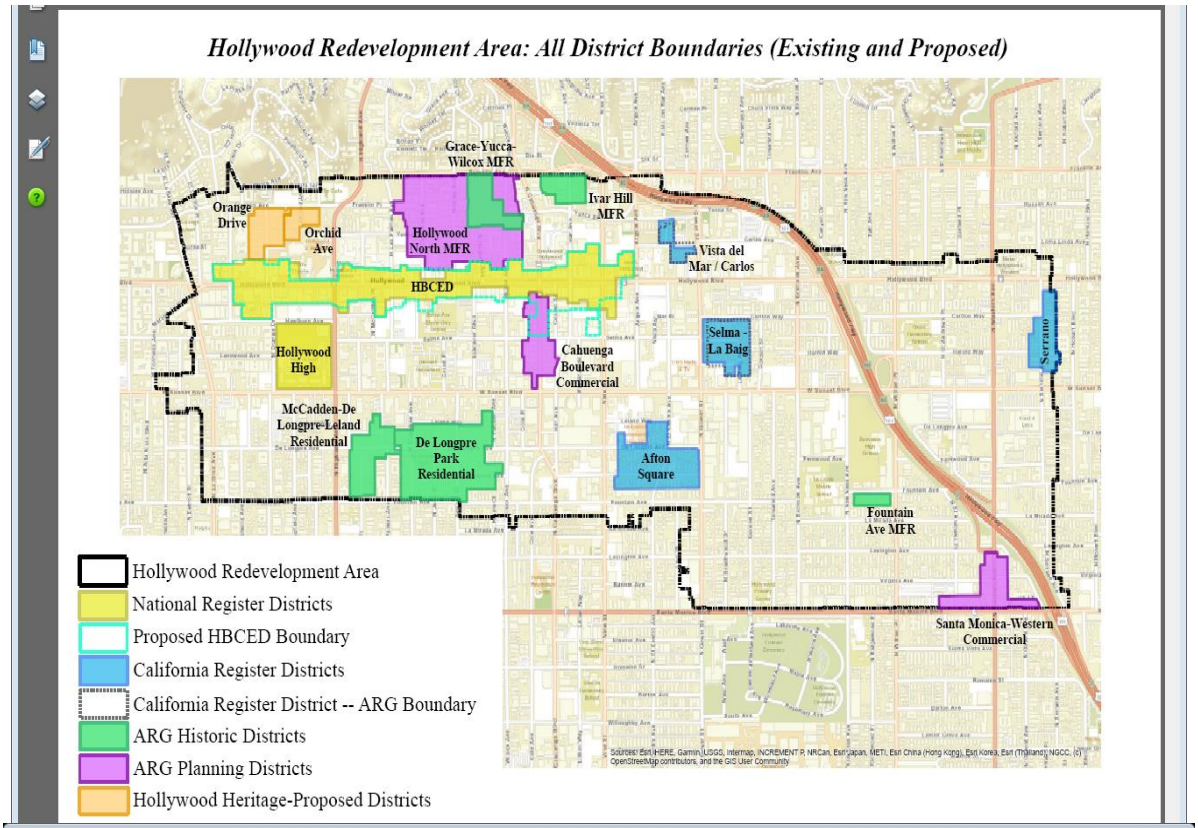
The Community Plan Update Process has been lengthy, however, so we want to summarize prior communications and salient documents. This is a work-in-progress.

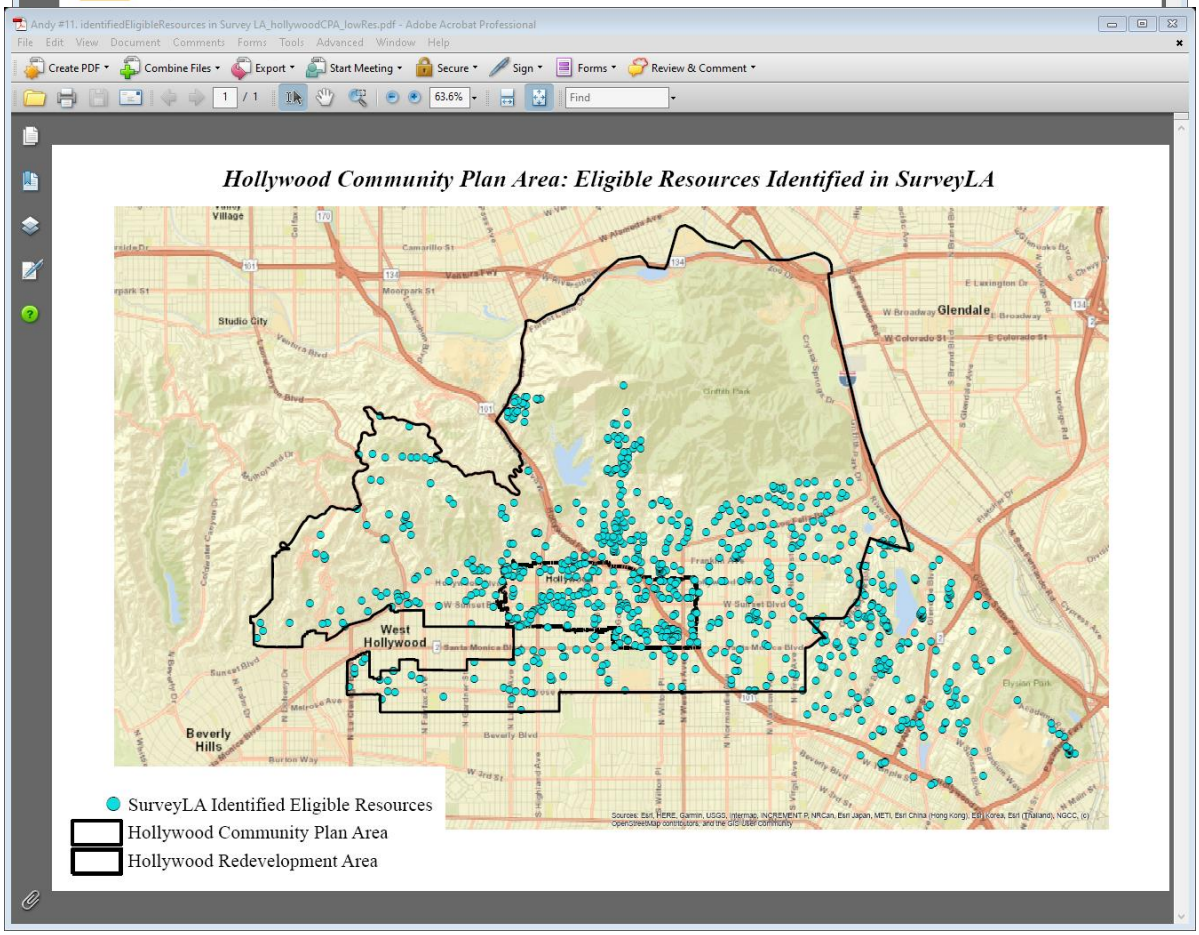
2012		Community Plan EIR concludes that City's proposed Plan has significant adverse impacts, which were stated to be unavoidable.
2014		
2016 June 16	**HPCU EIR Notice of Preparation**	• **Land Use Element** (land use maps; parcel- by parcel-Matrix for zoning, Q,D Conditions; plan text for Land Use) must integrate preservation. Conflict mapping missing. Incorrect boundaries of historic areas. Proposed upzoning (or "overzoned" existing zoning) makes current conflicts worse. . Plan – upzoning and incentivizing demolition on many parcels while stating that Preservation is the goal • **Implementation**- Implementation tools built into the 1988 Community Plan, Redevelopment Plan, General Plan, etc have NOT been carried forward into Plan Text, including listing of all identified historic buildings as HCMs; Hollywood Boulevard Urban Design District; Hollywood CoreTransition District protections; TDRs; design guidelines; downzoning, etc Implementation cited in EIR must be real—references to Cultural Heritage Commission and OHR review cannot be put forth in an EIR if they are nonexistant. SurveyLA's existence is not a mitigation without follow-up protections and processes. Secretary of the Interior Standards_must be stated._____ • **Plan Text:** Many good preservation-related stated goals and policies are in direct conflict with the actual • **EIR:** EIR must thoroughly identify historic resources and analyze the impact of land use decisions on the existing historic buildings. EIR must identify CEQA thresholds being applied. • **Conflict Map attached to HHI Letter**- Subareas with conflicts identified
		• Under State law, all land use planning must integrate and be consistent with Transportation,
2017 June	**Draft CPIO**	"No demolition permits for structures more than 45 years old shall be issued until the applicant has: - Conspicuously posted a demolition notice on the property - Sent letters to abutting neighbors, and - Notified the applicable Council District Office at least 20 days 30 days in advance of demolition' "No demolition permit shall be issued for any project unless a new project has been reviewed and approved by the Director of Planning"
	Draft EIR	• Appendix L "Designated Resources in the Hollywood CPA" listing of addresses- missing all HCMs, SurveyLA results, etc on p 4.5-26—list should be integrated
2019 January	**HHI Response to Draft EIR**	• Significant adverse effect of Plan on historic resources unacceptable- Plan needs work to eliminate • DEIR inadequate- conclusions reached with no analysis or pursuit of better alternative, No integration of historic areas mapping with proposed upzoning

		• No DEIR credible Alternative to protect historic buildings while at the same time allowing growth—no detailed investigation of how • Omission of role of CRA and its identified historic buildings and its obligations to preservation—which now have transferred to City Planning • Disconnect between Plan Text and Plan- Preservation Chapter has good intent- not carried through in Land Use or Zoning
2020 August	**Draft CPIO District (secured)** Issued	Reviewed in current document dated Dec 15, 2020
2020 August	**HCPU Update Powerpoint—**	• "Refreshed" Community Plan Policies and Programs (Hillside areas and rent protection!!!) • "Refreshed" Preservation Chapter in Plan Text • "Refreshed" Plan and Zoning maps- Upzone Media District (1.5:1 to 3:1) and allow commercial. HCR regs • CPIO "overhaul"
2020 August	**Revised Community Plan Text**	•
2020 August	**Revised HPCU Matrix**	•
2020 August	**CPIO Fact Sheet FAQ**	•
2020 August	**"Explainer" Doc – Historic Preservatioin**	•

ATTACHMENT #2

MAP #1

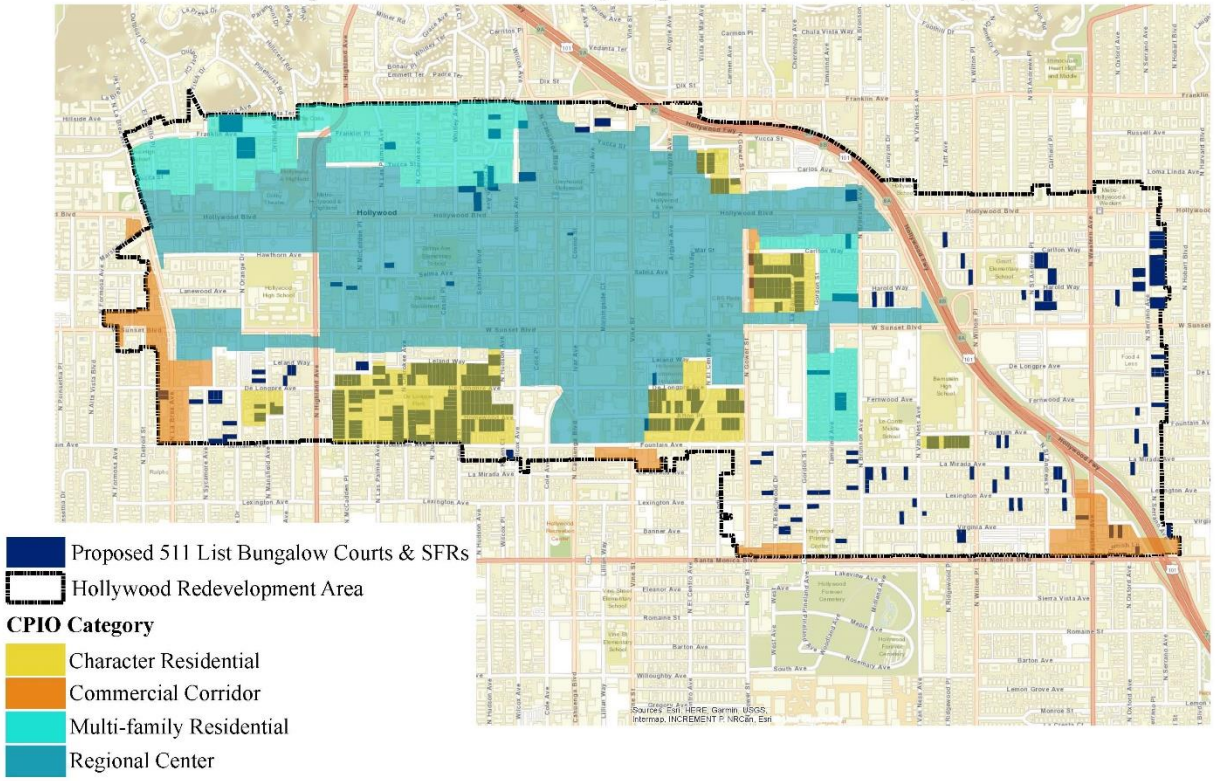


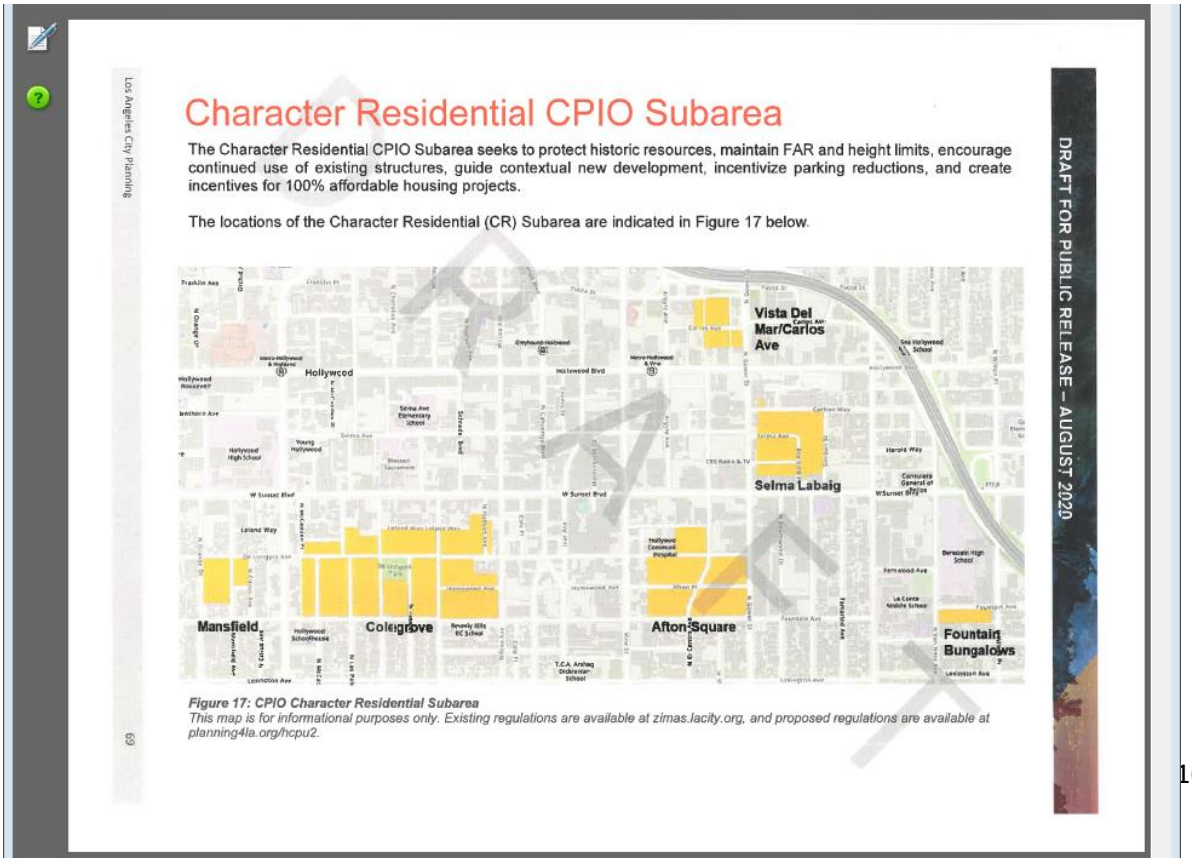


ATTACHMENT #2

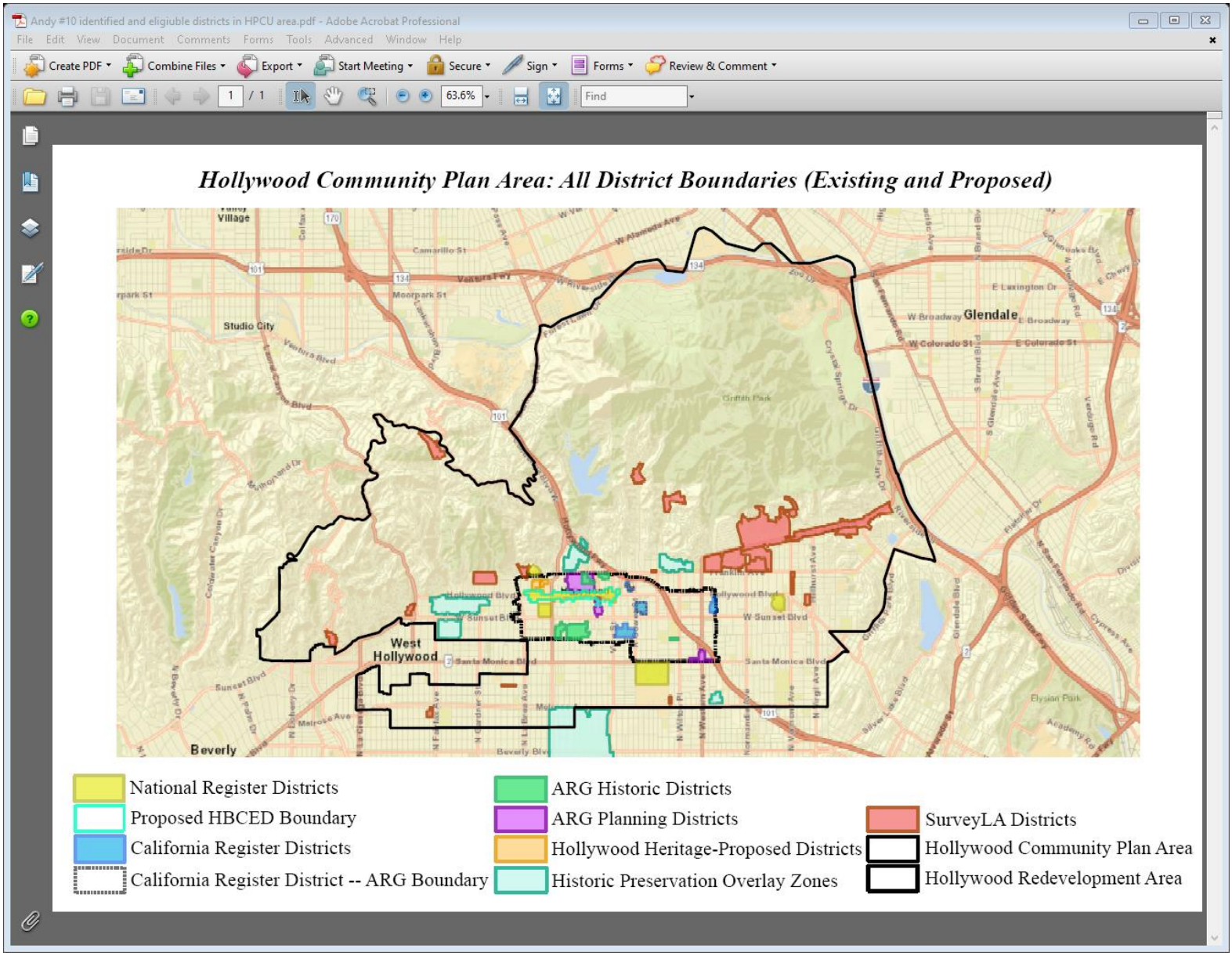
MAP #2

Hollywood Redevelopment Area: Proposed CPIO Boundaries and Proposed 511 List Members (Bungalow Courts & SFRs Only)



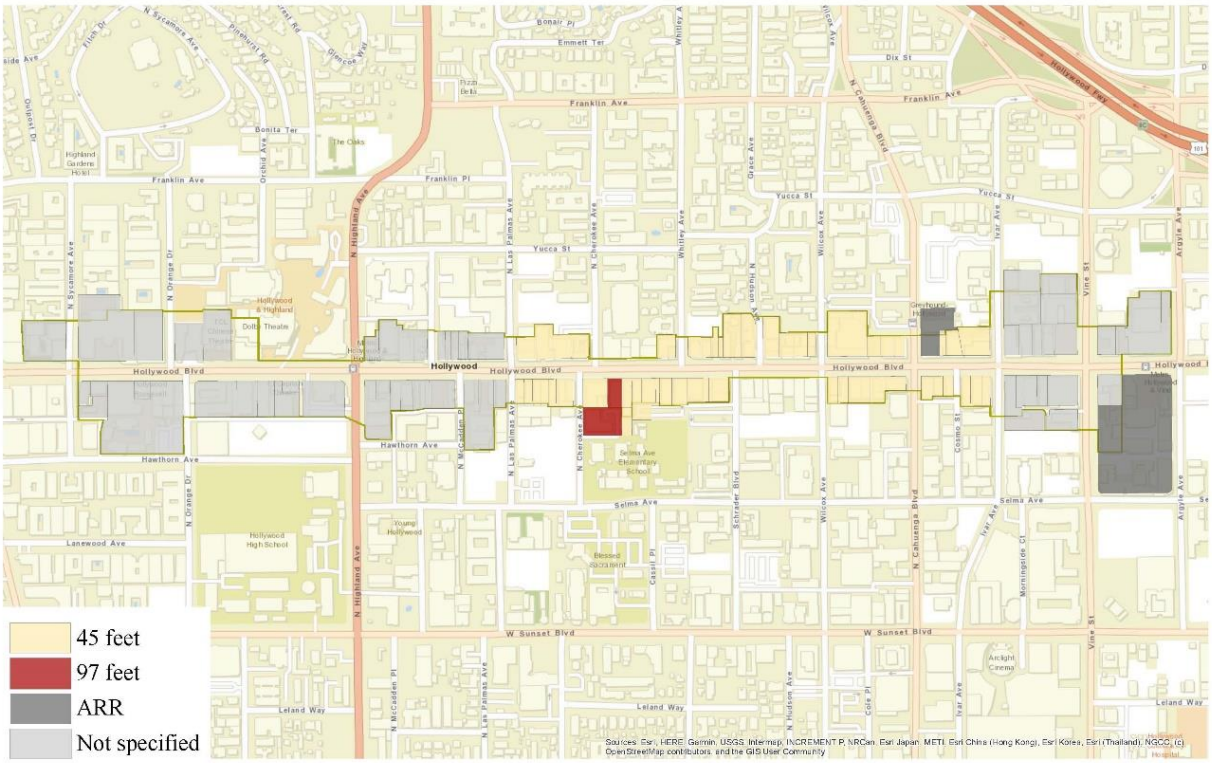


Map #3


Andy #10 identified and eligiuble districts in HPCU area.pdf - Adobe Acrobat Professional
Hollywood Community Plan Area: All District Boundaries (Existing and Proposed)
Studio City
Glendale
West Hollywood
Beverly
National Register Districts
Proposed HBCED Boundary
California Register Districts
California Register District -- ARG Boundary
ARG Historic Districts
ARG Planning Districts
Hollywood Heritage-Proposed Districts
Historic Preservation Overlay Zones
SurveyLA Districts
Hollywood Community Plan Area
Hollywood Redevelopment Area

Map #4

HBCED National Register District: Proposed Maximum Height by Parcel



ATTACHMENT #3

CRA Planning Responsibilities from Nov 2019 Transfer (submitted previously)

A. Redevelopment Plan (and City Planning) Mandates to Identify and Protect Historic Buildings

1	**CPC 86-835 GPC Cultural Heritage**	**Historic Listing and Protection Requirement**: Affects 134 landmarks. CRA was required in this case to list all National Register Status Code 1-3 buildings as Cultural Heritage landmarks, affording Cultural Heritage permit reviews. CRA sent the list—City failed to list. City created a ZI (ZI 1812) so that Plan Checkers send applicants back to CRA. City Planning has stated to HHI that they are conducting these reviews
2	**Redev Plan—CRA-Sec 511**	**Listing/Public Information**: "Agency ..shall maintain publicly available list of all buildings within the Project Area which it determines to be architecturally and/or historically significant." CRA identified 1,078 known landmarks at outset of Chattel survey
3	**Redev Plan—CRA-Sec 511**	**Protection requirement- delay of any kind of permit/ delay of demolition**: Buildings listed by CRA, CHM, CHRIS, and National Register deemed to be of architectural significance; procedures for design review for alterations and for delay of demolition for 180 days process, extendable to 360 days.
4	**Redev Plan—CRA-Sec 511**	**Scorched Earth- bonus denial:** " The Agency shall deny requests for housing incentive units, development in the Regional Center Commercial designation above an FAR of 4.5:1 and variations for sites on which a structure determined by the agency to be significant was demolished after the adoption of this Plan or is proposed to be demolished". (Note exempts SB 1818 increase)
5	**Redev Plan CRA 2003 EIR**	**Listing/Public Information**: 2003 EIR identified and extended protections through Mitigation Measures to 448 landmarks "In order to not report any significant effect under CEQA, the mitigation measure states "Rehabilitation of architecturally or historically significant buildings shall meet the U.S. Secretary of the Interior Standards for Rehabilitations".
6	**CRA-HHI Settlement**	**Protection requirement- delay of any kind of permit/ delay of demolition**: In absence of CRA meeting obligation for completed historic survey and listing, established process for CRA to consult with Hollywood Heritage on status of any building having a demolition permit application, and invokes delay of demolition for building

B. Redevelopment Plan Mandates for Design Review of Alterations, Heights and Density, and Effects of New Construction

	Redev. Plan	
1	**Redev Plan—CRA-Sec 409:**	**Design Review**: All rehabilitation undertaken in the Project Area..determined by the Agency to be or architectural and/or historical significance shall be rehabilitated in accordance with the Secretary of the Interior Standards
3	**Redev Plan—CRA-Sec 505.4 and 506.3:**	**Design/permit review**: Agency must review commercial uses in residential areas and residential uses in commercial areas
4	**Redev Plan—CRA-Sec 506.2.1**	**Design Review:** Hollywood Boulevard District Urban Design Plan required in 5 years, including design guidelines, may include a reduction of density up to 33%
5	**Redev Plan – CRA Sec 407.1.4**	**Design Review:** All development plans (whether public or private) shall be subject to review and approval by the Agency
5	**Redev Plan- CRA Sec 505.1**	**Design review** for any project exceeding 80 du/acre
6	**HHI Settlement Agreement signed by City**	**Follow 1993 Urban Design Plan** "Until the deadlines stated in this Agreement for the preparation of an update of the 1993 Design Plan have been met, CRA/LA agrees that any new project…in the Hollywood Boulevard Urban Design Plan area shall be subject to review by CRA/LA, which review shall include without limitation …the 1993 Design Plan, until the deadlines stated in this Agreement for preparation of an update of the Plan have been met. CRA/LA shall distribute the 1993 Design Plan to all new project applicants"

C. Mandated CRA Obligations re Incentives/ Affirmative Actions/ Land Use Limitations

Redev. Plan	
Redev Plan—CRA-Sec 505	**Planning:** Any residential area with architecturally or historically significant structures may be further planned to reduce allowable density, require compatible design, ensure adequate parking, and conserve structures
Redev Plan – CRA Sec 505.3	**Limits on Housing Incentive Units:** Agency will limit housing incentive units
Redev Plan—CRA-Sec 511	**TDRs** "The Agency shall promulgate procedures for such transfer proposals ….(and shall) obtain adequate assurances that the building from which the density transfer is taken are preserved and the development on the site to which the density is transferred will occur in conformity with the Redevelopment Plan, the objectives of special districts as established by the Plan and if applicable, any adopted Design for Development"
Redev Plan—CRA-Sec 506.2.3	**Monitoring traffic**: Required to make annual reports on buildout of FAR in Regional Center relative to traffic metrics; required to review all density increases above 4.5:1 and when Regional Center density reaches 2:0:1 FAR to establish specific methods and mechanisms to acquire open space or otherwise restrict or decrease density
Redev Plan—CRA-Sec 518 and 518.2	**Transportation Planning:** Plan required, including planning to ameliorate undersupply of parking in Hollywood Boulevard. Agency to monitor off street parking supply

D Mandated Plans in Redevelopment Plan—not completed by CRA, so required to be prepared by City Planning

	Implementation
Franklin Avenue Design District Plan • Redevelopment Plan Reqts: Sec 505.2: "a detailed design plan …which addresses preservation of architecturally and historically significant buildings, parking, circulation, views…"	• Community Plan to adopt HBUDP as a Specific Plan?
Urban Design Plan Hollywood Boulevard Historic District • Redevelopment Plan Reqts: Sec 506.2.1 and 518.2; "urban design plan including design guidelines and criteria and a parking and circulation program to meet these objectives..All new development in the District shall meet the design guidelines..may include a reduction of density"	• Community Plan to adopt HBUDP as a Specific Plan—Integrate into Community Plan and change current D condition to permanent 2:1 FAR? • Until HBUDP adopted, HHI Settlement Agreement requires all projects proposed for alterations, demolition, building permits, or discretionary actions to follow 1993 UDP as follows: enforcement through CRA • Interim mandated review as a part of all building permit and Planning applications; any environmental review to evaluate projects covered by 1993 UDP in all details and guidelines
Hollywood Core Transition District Development Guidelines • Redevelopment Plan Reqts: Sec 506.2.2.: "properties…shall be given special consideration due to the low density..provide for a transition in the scale and intensity of devt" • Redev Plan Sec 506.2.2 "The Agency shall review all permits in this District to ensure that circulation patterns, landscaping, parking, and the scale of new construction is not detrimental to the adjacent residential neighborhoods."	• HHI prepare a list of conditions for any development affecting the residential neighborhoods for adoption by CRA • Incorporation as "D" conditions in Community Plan Zoning for affected properties
Transportation and Parking Standards Ordinance	• Integration of iteris studies into Community Plan and EIR

	• City Planning to perform CRA annual reports • Fund CRA completion of 2:1 calculation for Regional Center • Parking study and review
Updated Cultural Resources Survey	• CPIO in Community Plan was to include all CRA addresses • CRA reserved right to alter standards of integrity in response to special circumstances in Hollywood—relative to Survey LA definitions • All "lowering" of status codes to be reviewed for loss of integrity; if loss of integrity due to remodeling since date of initial higher survey listing, or due to non-Hollywood integrity description in Survey LA • Review Hollywood Boulevard District with reference to 2014 submittal to State Office of Historic Preservation; HHI to provide review and map of existing District boundary (which is 35 years old) and proposed District boundary and contributors. New contributors to be identified with a 1D; non contributors to be identified with a ZI—subject to Sec 511 procedures
• Redevelopment Plan Req't: Publicly available list • Settlement Agreement Req't: Publicly available list "uploading to CRA website is acceptable" "a printed version of the Section 511 list shall be provided to members of the public on request and at reasonable copying charges" Background: Preservation.lacity.org\SurveyLA findings and reports\Hollywood\Hollywood Redevelopment Project Area\Property Index (HHI has copy) – file path changed 2020	• This is a non-searchable and non-mappable format. • To find an individual property there are 7 parts no index • Until data is mappable by the public from ZIMAS—as opposed to simply verbally connected to ZIMAS by marking "yes" on Historic Review, and searchable by address, City Planning will put a ZI on all parcels in the Redevelopment Area
Density Transfer Procedures (to incentivize preservation) • Redevelopment Plan Reqts • Settlement Agreement Reqts:	• Donor and receiver map: from 1993 UDP • City agree no discretionary increase in density in Regional Center Commercial without equal compensatory reduction of development in historic building area

E Mitigation Measures carried forward from Hollywood Redevelopment Plan EIR

1	**Redev Plan CRA 2003 EIR**	**EIR review:** Projects proposed in proximity to a cultural resource "the Agency will require a study to be made by a qualified architectural historian to determine whether the proposed development would result in substantial adverse change in the significance of the historical resource
2	**Redev Plan 2003 EIR**	**Design Review Mitigation Measure**: "In order to not report any significant effect under CEQA, the mitigation measure states "Rehabilitation of architecturally or historically significant buildings shall meet the U.S. Secretary of the Interior Standards for Rehabilitations". This restates the requirements in the Redevelopment Plan

F. Are Current City Planning Mandates for Identify/Protect Historic Buildings in 2018 Draft Community Plan EIR?

1	**City Planning Affadavit**	**Hold on demolition:** Planning agreed December 16, 2016 with Hollywood Heritage that they can and will institute an Affadavit Process—Applicants will be required to sign a statement indicating "This permit (including every demolition permit) request is not a part of a larger project." . This is to stop the common practice be certain developers for piecemealing, which violates CEQA.
2	**Cultural Heritage Ord**	**Listing/Public Information/ Protection requirement**: Listing of Cultural Heritage monuments (mapped on Navigate LA); Building permit review for alterations. Possible delay of demolition
3	**HPOZ**	**Listing/Public Information/Protection:** Listing of single family neighborhood HPOZs outside of Redevelopment Area.
4	**HPOZ's under consideration**	**Listing/Protection:** Listing of new single family neighborhoods proposed outside of Redevelopment Area
5	**Comm Plan 1986**	**Protection:** TDR and preservation as justification for 6:1 FAR
6	**Comm Plan 2012**	**Protection:** (Areawide) "D" Conditions on parcels with historic buildings
8	**General Plan Conserv Element**	**Listing/Protection** • City Planning and LADBS: Development permit processing, monitoring, enforcement, and periodic revision of regulations and procedures • Element: Prepare the Historic Preservation and Cultural Resources Element of the Community Plan • Identify: Continue to survey buildings and structures… including context • HPOZs
9	**2018 Comm Plan DEIR**	**Listing/Public Information**
10	**2018 Comm Plan DEIR**	**Conflict Mapping, Analysis, and actions to reduce impacts**

G. What are Mitigation Measures possible for the HPCU, in addition to adopting all of the CRA protections :

I	**Clarify public benefits:**	The cornerstone of CRA's authority for discretionary approval of high densities in the 2005 Redevelopment Plan is intended to be twofold: traffic and parking mitigations, and a Transfer of Development Rights Program. City Planning not allowed to approve discretionary higher densities under Redevelopment Plan without providing the public benefits which are critical to the Hollywood Community.

2	**New Historic Preservation Overlay Zones**	CRA surveys over the years identified specific historic residential districts. These CRA districts should be reflected as potential HPOZ areas in Community Plan mapping and the EIR. The multi-family area north of the Hollywood Blvd. National Register District was identified in 1986 as needing special urban design protections; this area is especially critical. This area should have an ICO placed on it until an appropriate preservation mechanism is identified. The proposed Plan creates an avoidable impact on this area.
3	**Historic Cultural Monuments**	The Hollywood Community Plan adoption by the City Council in 1986 required that roughly 100 National Register and other listed historic buildings be forwarded by CRA to the Cultural Heritage Commission for listing as HCM's at the City, and for notification of the CHC in the event of proposed demolitions. CRA met its obligation and City Planning did not implement. The EIR must reflect this current non-compliance. The City agreed in 2009 again in a formal Settlement Agreement.
4	**Mapping of "protected" historic buildings, and notification of planned demolitions:**	There is a currently-adopted list of CRA buildings, with Status Codes 1-4 protected by the Hollywood Redevelopment Plan, including recognition of these buildings in EIRs. These addresses must be transferred, mapped, and protected by City Planning and reflected in the EIR. In addition there is an interim procedure set by judicial action wherein Hollywood Heritage is consulted on planned demolitions for Status Codes 1-6 within the Redevelopment Area Update 2020: ARG list uploaded into historicplacesla—Hollywood heritage has done a parcel by parcel check and mapped in GIS format and produced the "511 List" in Excel spread sheet format..
5	**Interim Control Ordinance immediately:**	The Hollywood Boulevard National Register Commercial and Entertainment Historic District will need an ICO to give the Planning Department time to follow up on the court-mandated CRA Urban Design Plan, and to work to conform the zoning categories with current protections. The multi-family area north of the Hollywood Blvd. National Register District was identified in 1986 as needing special urban design protections; this area is especially critical. This area should have an ICO placed on it until an appropriate preservation mechanism is identified. The proposed Plan creates an avoidable impact on this area.
6	**Prohibition of Demolition**	Step two

ATTACHMENT #4

HOLLYWOOD HERITAGE
Definition/Review of Historic Resources within Hollywood Redevelopment Area
Summary of Peer Review required from Hollywood Heritage

(Detailed excel spread sheets and GIS format maps available)

Moving forward from the HPCU DEIR: The Hollywood Community Plan Update and the CPIO must have consistent, clear resolved identification of historic resources in the former Community Redevelopment Area. The last listing provided was Appendix L in the 2018 version of the HPCU; this was incomplete.

All of the concepts, categories, and other information presented to City Planning is backed by a detailed series of Excel spreadsheets created by Hollywood heritage, with the pertinent information on each property listed in a table. The Excel list meets the requirements of showing earlier status codes. This data has been mapped in a series of overlays which illustrate geographic proximity, level of significance, current planning information, conflicts for resolution due to zoning, etc.

One final step needed is to compare our list to Appendix L from the Community Plan EIR. This is the answer for satisfying a "publicly available list of all buildings" noted in the Plan. However, survey information is dynamic—time passes.

"The 511 List" is what we call the survey results from the most recent work prepared by the Redevelopment Agency and turned over to Los Angeles City Planning and uploaded in whole or part "HistoricPlacesLA." Prepared by Architectural Resources Group, portions of it are called "ARG list" which identify known historic resources as of the beginning of 2020.

Hollywood Redevelopment definition from Section 511 has been the definition of resources, and the "list" is notably based on expert and professional surveys. The area has been surveyed and re-surveyed multiple times over its 35 years. "Buildings listed as Cultural-Historic Monuments by the City and listed in, determined or appear to be eligible for listing in the National Register of Historic Places are determined to be of architectural and/or historic significance. The Agency shall use established criteria for determining additional architectural and/or historical resources and shall maintain a publicly available list of all buildings within the Project Area which it determines to be architecturally and/or historically significant."

In practice, these resurveys have negotiated the changes in status code definitions handed down from Sacramento.

Properties in a district – "non-contributors" must be listed in 511 list: The CPIO goes to great pains to direct that "non-contributors" to Hollywood's historic districts may be demolished by right and replaced. Hollywood Heritage believes this is wrong at this time—for 3 reasons:

1. Properties in historic districts are classified as individually eligible, or eligible part of a district and within its boundary(collection of resources have a unified boundary and ascribed "period of significance.") Today district components in the Redevelopment Area are separated into "contributing" and "non-contributing" features. However, these designations are old and based on windshield surveys, and were not re-visited by experts in the ARG survey.

2. The category of "altered contributors" – used by Los Angeles HPOZ's to recognize buildings which contribute in their massing, style, urban patterning etc to a district, and are within its boundaries but perhaps are poorly altered, is missing from the ARG Survey.
3. As well, the actual allocation of current contributors and non-contributors may have changed.

Automatic demolition of "non-contributors" skips 2 crucial steps—assessing whether there is an underlying building which can contribute (for example when facades are covered over in commercial areas), and assessing in detail the urban design characteristics in the specific part of an overall district that are pertinent so an infill buildings will be compatible. Skipping these steps in not allowed under CEQA—as reflected in the Niles decision in California and in Preservation Brief #14, which is the accepted measure of compliance with the Secretary of the Interior Standards.

Total number of properties: 913
Total number of current non-contributors within districts: 261

Action items/recommendations re "non-contributors":

1. 511 list must contain all properties within the boundaries of an identified or designated historic district built during the period of significance, including "non-contributors" Until further assessment is done and protocols aligned with the Los Angeles Historic Preservation Overlay Zone program (which allows for "altered contributors" from the period of significance and requires design review), the proposed
2. "Altered contributors" be introduced as a "511 List" category
3. These properties be given protection under the Redevelopment Plan, Community Plan, and accompanying CPIO. Rehabilitation of contributors and non-contributors from the period of significance will result in more robust and cohesive districts and stop the erosion of the resource ("district"). Infill on parcels which contain non-contributors outside the period of significance must be reviewed for "compatibility" with existing historic construction. The Secretary of the Interior's Standards and Guidelines for Rehabilitation shall be the authority on rehabilitation techniques and compatible new construction.

Recommendation for "Historic Resources" : " HHI Proposed 511 List" which includes:

a) Evaluation code 1, 1D and 3S, 3D: Properties listed in or identified as eligible for inclusion in the National Register of Historic Places, either as individuals or as part of a district. This includes both contributing and non-contributing properties from the identified or updated period of significance within the boundary of a district. (Non-contributors from the period of significance should have a status code 1D*.)
    - Associated districts: Hollywood Blvd. Commercial and Entertainment District -proposed period of significance 1964; Hollywood High School Historic District; Grace-Yucca-Wilcox Multi-Family Historic District; Ivar Hill Multi-Family Residential; De Longpre Park Residential; McCadden-De Longpre-Leland Residential; Fountain Avenue Multi-Family Residential.)
b) Evaluation code 2 and 2D: Properties identified as designated or eligible for designation for inclusion in the California Register. In a district, both contributors and noncontributors from the period of significance are a part of the 511 list. (Non-contributors from the period of significance should have a status code 2D*.)
    - Associated districts: Selma/LaBaig; Afton/DeLongpre; Vista del Mar/Carlos; Serrano Historic District.
c) HCMs and locally eligible ARG 5's: Properties identified as locally eligible for listing either individually or as part of a district in the CRA update of 2019 (ARG) and those designated as Historic Cultural Monuments in the City of Los Angeles. "Eligible Historic Resources" definition

in CPIO: properties identified as eligible for listing as individual historic resources on the National Register of Historic Places, or on the California Register of Historic Resources, or as contributors within a historic district that is eligible for listing at the Federal, State, or Local level (p. 5). This differs slightly from our proposed 511 list in that it does not identify "5s" in the 2019 update.

d) Properties identified within Planning Districts identified by the 2019 update (ARG) which are from the period of significance of that district.
    - Associated districts: Cahuenga Boulevard Commercial Planning District; Hollywood Multi-family North; Santa Monica-Western Commercial Planning District

e) HHI Multifamily district—Orange/Orchid: Properties within the 1700 blocks of Orange and Orchid identified by Hollywood Heritage as districts but not included in the 2019 CRA update.

Public Information and the proposed 511 List

Per our conversation, Hollywood Heritage is requesting a separate ZI to identify historic resources within the Redevelopment Area. The current ZI 2488 for the Redevelopment Area does indicate that there may be certain parcels which contain historic resources which are subject to further assessment/review, but the code is not specific to historic resources.

1. Morton, W. Brown, Anne E. Grimmer, and Kay D. Weeks. *The Secretary of the Interior's Standards for Rehabilitation & Illustrated Guidelines for Rehabilitating Historic Buildings*. Washington, D.C.: U.S. Department of the Interior, National Park Service, Cultural Resources, Preservation Assistance Division, 1992.

ATTACHMENT #5

Draft Hollywood Community Plan
Update 2018
Update 2020

Hollywood Heritage
Response to Draft Plan and Draft EIR

HPCU Goals for Preservation, and HHI Review of Proposed Implementation

Hollywood Heritage Inc
Updated Jan 2019 for review of Nov 2018 Draft
Updated Dec. 2020 in reference to CPIO

Background:

The Hollywood Community Plan Update (HPCU) Draft Plan Text states goals, policies, and implementation projects regarding historic preservation.

- The only mandatory part of a Community Plan is the Land Use Plan. The Land Use category and zoning (density, uses, heights etc.) assigned to each land parcel are the Plan. If the CPIO covering historic preservation is a part of the zoning for certain parcels, it will be mandatory as well.
- The goals, policies, and implementations noted below are aspirational. They are intended to guide Planning and other departments in their future priorities and discretionary actions.
- If a goal or policy is not carried through now in the zoning that is proposed to be adopted, then for now that goal or priority is not being carried out as a part of the adoption of this proposed Community Plan. It is being recommended for the future.
- The HPCU Plan Text issued November 2018 replicates most of the proposals from 2017. Hollywood Heritage circulated our review at that time. The document was again revised in August 2020

D. Goals stated– Plan summary says HPCU "promotes preservation"—the CPIO is what can make this true

- **"**Expands historic resources protection in Hollywood" -
- "Supports the establishment and expansion of historic districts, including expansion of the Melrose Hill Historic District
- "Links the use of incentives to historic preservation, and requires conformance with the Secretary of the Interior Standards

E. 2017/8 Draft Preservation Element Text- Goals, Policies, and Implementation (Update 2020)

Goal P.1: Honor Hollywood's legacy through the preservation of the built environment that reflects Hollywood's cultural, social, economic, and architectural history.

	Policy	Implementation – listed as Short Term	Timing?	HHI recommends
P 1.1	Significant neighborhoods and districts. Support the preservation of culturally and historically significant neighborhoods and districts.	• **P28** Current HPOZ protections and new HPOZs - provide rehab guidance to owners • **P29**: Develop Los Feliz HPOZ • **P31:** Study expanding Melrose Hill HPOZ • **P68:** Work with neighborhood councils and preservation organizations to create interpretive programs & signage	**DCP** Short term (immediate) Long term (with Council Office etc)	**CPIO Prior to Plan Adoption—** Include all identified— Extend HPOZ status to all in CRA área Identify budget for HPOZs
P 1.2	Adaptive reuse. Promote the preservation and adaptive reuse of existing building stock, especially for designated or eligible historical resources.	• **P65**: Improve and streamline rehabilitation with "early" advice and guidance from DCP and LADBS	**DCP and LADBS** Long term-No specific proposed action	Training sessions on State Historic Building Code etc at LADBS

P 1.3	Designated and potentially significant resources. Preserve designated Historic Cultural Resources and further study eligible resources as potentially significant resources.	• **P38**: Study a CPIO or Specific Plan for Hollywood and Sunset Blvds for infill – limit lot consolidation, guidelines for site design, approved plans prior to demolition to retain neighborhood character	**DCP** Short term (immediate)	**Prior to Plan Adoption—Deal now in CPIO** extend CHM protection to all National Register properties (Ken says this is already being done) list all buildings required in 1990 as HCMs now
P 1.4	Buildings in FAR Incentive Areas. Protect designated historical buildings, including those which are located within Floor Area Ratio (FAR) Incentive Areas and multi-family residential areas where the Plan restores citywide standard R4 density. (*Upzone, incentivize demolition, in order to protect?)*	• **P33.** Study the feasibility of TDR Hollywood program • **P38:** Study a CPIO or Specific Plan for Hollywood and Sunset Blvds for infill – limit lot consolidation, guidelines for site design, approved plans prior to demolition to retain neighborhood character	**DCP** Short term (immediate)	**Prior to Plan Adoption—** **Main job of CPIO now is to protect from Plan's upzoning or reverse upzoning** TDR now in CPIO-
P 1.5	Distinctive street features. Protect distinctive features of prominent streets in Hollywood, such as the Walk of Fame, a recognized Historic Cultural Monument of the City of Los Angeles.	• **P34:** Maintain Walk of Fame designation, dimensions • **P66:** Rehabilitation Plan for Walk of Fame • **P138:** support initiatives like HEART of Hollywood	**DCP/BOE/DOT** -Short term (immediate) Acknowledge existing process and procedures, No process or timing proposed	Add significant streetscapes—Cahuenga, etc, as identified by CRA survey
P 1.6	Study preservation tools. Support the study of Residential Floor Area (RFA) Special Districts, Community Design Overlays (CDOs), or a Community Plan Implementation Overlay (CPIO) for neighborhoods that retain a cohesive character but are not eligible to become Historic Preservation Overlay Zones.	No policies or implementation provided		**Prior to Plan Adoption CPIO—** Commit to neighborhood protection for Character Residential and add Multifamily historic protections--Ivar Hill. Colegrove, Hollywood North Multifamily, , Fountain bungalows, Mansfield-
P 1.7	Preserve designated resources. Any development project which involves designated historical resources, including City of Los Angeles Historic-Cultural Monuments, shall conform with the Secretary of Interior's Standards for Rehabilitation	• **P35:** establish zoning regulations to ensure appropriate review of designs for resources	**DCP-** Short term (immediate) Is this incorporated for every identified resource in the plan?	**Prior to Plan Adoption—CPIO** Clearly apply Standards to all identified resources—not just those designated already by City of Los Angeles

P 1.8	Complementary design. Encourage the design of new buildings that respect and complement the character of adjacent historical resources through design standards ..such as CDO, CPIO	• **P36:** Use Citywide Design Guidelines for new and infill development • **P37**: Study Rodney/Lyman/Alley for potential historic significance • **P38**: Study a CPIO or Specific Plan for Hollywood and Sunset Blvds for infill – limit lot consolidation, guidelines for site design, approved plans prior to demolition to retain neighborhood character	**DCP** **No process or timing proposed**	**Prior to Plan Adoption—** *CRA Redev Plan Sec* ____ *Hollywood Blvd Urban Design Plans, etc* *P 36: Require analysis under Preservation Brief #14 .*
P 1.9	Land use and zoning. Maintain appropriate General Plan Land Use designations and zoning in existing historic districts which are either listed in, or are eligible to be listed in the National Register of Historical Resources. Promote infill development that matches the scale of historical resources within each district, including the following: height, massing, setbacks, stepbacks, and development pattern	• **P 39:** Study Afton Square, Selma Le Baig, Serrano	**DCP-** **No process or timing proposed**	**Prior to Plan Adoption—** **CPIO** **Revise all proposed land use designations due to conflicts** *Hollywood Core Transition by CRA affects Afton Place* *Hollywood Boulevard most important National Register District* *Require use of Preservation Brief #14* *Extend HPOZ protections and procedures immediately* *Prohibit parcel assembly* *Strong development limitations and override of TOC in CPIO p 69 and 70-*
P 1.10	Height limits. Maintain height limitations on commercial zones that border designated or eligible historic neighborhoods. Encourage the design of new buildings that respect and complement the character of adjacent historic neighborhoods.	• **P40:** Study heights at Sunset and Western	**DCP-** No process or timing proposed	**Prior to Plan Adoption—**
P 1.11	Financial resources. Support efforts to identify financial resources for rehabilitation of historical resources. Promote the use of the City's Mills Act	• **P67:** Partner with HCID to rehabilitate housing	**DCP, HCID** No process or timing proposed	

	Historical Property Contract Program, the Federal Historic Rehabilitation Tax Credit, and the California Historical Building Code			
P 1.12	Documentation. Support opportunities to document Hollywood's history and architectural legacy and share that history with the community.	• **P41:** Support and complete Historic Places LA • **P68:** Work with neighborhood councils and preservation organizations to create interpretive programs & signage	**DCP-** Long term	**Prior to Plan Adoption—**

Linda Lou <linda.lou@lacity.org>

HCPU Public Comment from Nelson Silver

3 messages

Shane Swerdlow <shane@craiglawson.com> Wed, Dec 16, 2020 at 4:03 PM
To: Los Angeles City Planning <hollywoodplan@lacity.org>

Hi Members of the HCPU Team,

Attached is a public comment from Nelson Silver, owner of the property at 936-962 N. Seward Street and 949-959 N. Hudson Avenue within the Hollywood Media District (HCPU Subarea 40:2).

Please let us know if you have any questions.

Thank you,

Shane

Craig Lawson & Co., LLC
Land Use Consultants

Shane Stuart Swerdlow

Project Manager

Craig Lawson & Co., LLC

3221 Hutchison Avenue, Suite D

Los Angeles, CA 90034

shane@craiglawson.com

http://www.craiglawson.com/

I am currently working remotely and can be reached by e-mail as well as my mobile number: 714-618-0404.

Public Comment - HCPU Subarea 40-2 - Avon.pdf
170K

Shane Swerdlow <shane@craiglawson.com> Wed, Dec 16, 2020 at 4:34 PM
To: Linda Lou <linda.lou@lacity.org>

Hi Linda,

Hope you're doing well.

I just submitted the attached public comment to the general Hollywood Plan email address and wanted to make sure you received this as well.

Let me know if you have any questions.

Thank you,

Shane

Craig Lawson & Co., LLC
Land Use Consultants

Shane Stuart Swerdlow

Project Manager

Craig Lawson & Co., LLC

3221 Hutchison Avenue, Suite D

Los Angeles, CA 90034

shane@craiglawson.com

http://www.craiglawson.com/

I am currently working remotely and can be reached by e-mail as well as my mobile number: 714-618-0404.

[Quoted text hidden]

Public Comment - HCPU Subarea 40-2 - Avon.pdf
170K

Linda Lou <linda.lou@lacity.org>
To: Shane Swerdlow <shane@craiglawson.com>
Cc: Los Angeles City Planning <hollywoodplan@lacity.org>

Hello Shane,

Thank you for your comment letter. It has received and filed.
I also received the one you sent directly to my email address. I will only include one copy in the case file.

Best,

Linda

Linda Lou
Pronouns: She/Her/Hers
City Planner
Los Angeles City Planning
200 N. Spring St., Room 667
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1473
E-NEWS

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AVON

RENT - A - CAR • TRUCK • VAN

A DIVISION OF SILVERCO ENTERPRISES

December 16, 2020

Sent via email to:
Hollywood Policy Planning Team hollywoodplan@lacity.org
Department of City Planning
City of Los Angeles
200 N. Spring Street
Los Angeles, CA 90012

Subject: Hollywood Community Plan Update, Subarea 40:2
936-962 N. Seward Street and 949-959 N. Hudson Avenue

Dear City Planners:

My name is Nelson Silver, and I am the co-founder and owner of Avon Studio transportation. Our company has played a critical role in the entertainment industry for 42 years, serving as the go-to vehicle rental resource for film and television production. We own property throughout Hollywood, including the site at 936-962 N. Seward Street and 949-959 N. Hudson Avenue within the Hollywood Media District (Hollywood Community Plan Update Subarea 40:2).

I am writing to express my strong support for the proposed zoning for the Hollywood Media District, which would allow 3:1 FAR for projects integrating at least 0.7:1 FAR of media-related uses.

In recent years, the Hollywood Media District has seen significant investment and development, reinforcing its status as the global center for the entertainment industry. The proposed zoning will help sustain this economic growth, which is needed now more than ever.

Thank you for your consideration of my comments.

Sincerely,

Nelson Silver

Linda Lou <linda.lou@lacity.org>

UN4LA Comments on Hollywood Community Plan Update & CPIO

2 messages

cmaddren@gmail.com <cmaddren@gmail.com> Wed, Dec 16, 2020 at 4:50 PM
To: hollywoodplan@lacity.org
Cc: cmaddren@gmail.com

Hello,

UN4LA would like to submit the attached comments on the Hollywood Community Plan Update and the associated CPIO.

Could you please send a brief response to acknowledge receipt of the attached letter?

Thanks,

Casey Maddren

United Neighborhoods for Los Angeles

HCPU & CPIO UN4LA Comment Ltr 201216 FINAL.pdf
1374K

Linda Lou <linda.lou@lacity.org>
To: Casey Maddren <cmaddren@gmail.com>
Cc: Hollywood Plan <hollywoodplan@lacity.org>, Casey Maddren <cmaddren@gmail.com>

Hello Casey,

Thank you for your comment letter. It has been received and filed.

Best,

Linda

Linda Lou
Pronouns: She/Her/Hers
City Planner
Los Angeles City Planning
200 N. Spring St., Room 667
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1473
E-NEWS

[Quoted text hidden]

United Neighborhoods for Los Angeles

www.un4la.com

December 16, 2020

Department of City Planning
200 N. Spring Street
Los Angeles, CA 90012

Re: Hollywood Community Plan Update & CPIO
Comments from United Neighborhoods for Los Angeles (UN4LA)

To Whom It May Concern,

United Neighborhoods for Los Angeles (UN4LA) is a community group formed to foster better planning and better government within the County of Los Angeles, and all cities and unincorporated areas contained within the County's borders. UN4LA's primary areas of focus are planning, development, budget/finance, environment/open space, and ethics.

We have reviewed the Hollywood Community Plan Update (HCPU) and have a number of concerns. We would like to submit the following comments, including some questions regarding the information presented in the Plan.

Please add UN4LA to the distribution list for further communications regarding the Downtown Community Plan and the New Zoning Code. Our physical address is:

United Neighborhoods for Los Angeles
2141 Cahuenga Blvd., Apt. 17, Los Angeles, CA 90068

E-mail address and phone number are below.

Sincerely,
Casey Maddren, President
United Neighborhoods for Los Angeles
cmaddren@gmail.com
323 462-7804

HOLLYWOOD COMMUNITY PLAN UPDATE

COMMENTS FROM UN4LA

General Comments

To start with, we must state that the Hollywood Community Plan Update seems completely out of touch with the reality of the place called Hollywood. While the Draft HCPU contains many beautiful color photographs and a good deal of upbeat marketing-speak, we must ask if the authors have actually paid a visit to Hollywood in the last ten years. The fact that the Plan fails to discuss the high rate of homelessness, the decline in transit ridership, the lack of maintenance for parks, the degradation of the urban forest and a number of other pressing issues, seems to indicate that the authors have no familiarity with the area at all.

We understand that the Plan is meant to provide a broad vision rather than a clear roadmap with detailed outlines, but the vision laid out in the Draft HCPU fails repeatedly to acknowledge the real challenges that Hollywood (and the City at large) is facing. For instance, the chapter Land Use & Urban Form contains the following language:

While focusing growth around transit nodes and corridors, the Plan creates an environment that encourages places for people to live, work and play in Hollywood as well as a way for them to get there without the use of a single occupancy vehicle.

But while the City has been pushing transit-oriented development (TOD) for years now, and a number of high-end high-rises have already been built in Hollywood, transit ridership in the area has been declining for years. Overall Metro ridership has seen a decline of about 20% since 2013, and some of the lines that serve Hollywood have seen even greater losses. While LADOT does not release ridership stats for individual lines, overall ridership on DASH busses has fallen over 25% since 2013.

Immediately following the sentence above, we find this statement:

The Plan supports the development of affordable housing incentives and encourages affordable units in new development.

The City has eagerly embraced density bonusses as a way to increase affordable housing stock, but the actual gains have been relatively small, and it's common for density bonus projects to demolish existing RSO housing. The LADCP's Housing Progress Dashboard shows that, since July 2013, 88% of the housing approved through planning entitlements has been for Above Moderate Income Households, while Moderate, Low Income and Very Low Income Households get to compete for the remaining 12%. The fact that the Dashboard fails to include the number of units demolished to make way for new housing means that net gains are actually even smaller.

LADCP Housing Progress Dashboard
https://planning.lacity.org/resources/housing-reports

Failure to Comply with General Plan Monitoring Requirement

One of the key problems with the City's approach to planning is that it fails to comply with the requirements of its own General Plan. Among the programs laid out in the Framework Element to achieve its overall goals are these:

- *Establish a program to monitor growth and public service and infrastructure demands and capacities.*

- *Prepare and submit to the City Council an Annual Report on Growth and Infrastructure, based on information compiled by the monitoring program.*

The City of LA does not appear to have a program in place to monitor the demands and capacities of public services and infrastructure. Nor have we seen the City Council receive and review annual reports on public services and infrastructure. While a number of City departments produce individual reports on their activities, these also seem to focus largely on bright photographs and upbeat statements about how great the department is doing. These reports rarely discuss challenges, never discuss failures, and mostly avoid providing any context which would help assess progress. For instance, while the most recent LADOT Annual Report does state that there were 19,291,074 unlinked trips in 2018/2019, it provides no historic data. It does not report that this represents a slight increase over the previous period, and a significant decline since 2013. Without this necessary context, how are planners or the public at large supposed to know whether we're making progress or falling behind?

This failure to provide consistent reporting and to evaluate progress is central to the failure of the Draft HCPU. Because the City does not in any way acknowledge the failures of its policies to achieve important goals in the areas of housing, transit, open space/parks and the urban forest, it blindly continues to embrace the same policies. The authors of the Draft HCPU present Hollywood as a thriving entertainment center with a bright future. The struggling middle-class and low-income families who actually live in Hollywood know better.

UN4LA believes the Draft HCPU is built on a false foundation. The authors see only the Hollywood hype. They've completely missed the Hollywood reality.

Hollywood Community Plan Update

Community Background

In the Community Background section, under Population, Housing & Employment, the Draft HCPU presents Table 2-1.

Table 2-1
Population, Housing and Employment

	Existing (2016 Estimate)[1, 2]	2040 Projection[1]	Plan's Reasonable Expected Development[2]
Population (persons)	206,000	226,000	243,000 - 264,000
Housing	104,000	113,000	121,000 - 132,000
Employment (jobs)	101,000	119,000	124,000 - 127,000

[1] Based on SCAG estimates (2016-2040 SCAG RTP/SCS).
[2] City of Los Angeles Department of City Planning
Numbers are rounded to the nearest thousand.

The footnotes tell us that the population data comes from SCAG's 2016-2040 RTP/SCS. We have reviewed the RTP/SCS and found no data specific to the Hollywood area. We must ask the City to direct us to the section of the RTP/SCS where this information can be found, or to present the SCAG data on which these results are based.

In the HCPU DEIR we find the following table in the Summary section.

TABLE 2-1: 2040 REASONABLY EXPECTED DEVELOPMENT OF THE HOLLYWOOD COMMUNITY PLAN COMPARED TO SCAG FORECAST

	2016 Baseline	Existing Plan Reasonably Expected Development /c/	Proposed Plan Reasonably Expected Development	SCAG 2040 Growth Forecast /c,d/
Housing /a,b/	104,000	113,000 – 121,000	121,000 – 132,000	113,000
Population	206,000	226,000 – 243,000	243,000 – 264,000	226,000
Employment	101,000	119,000	124,000 –127,000	119,000

/a/ SCAG provides estimates and forecasts for households, which is the equivalent of occupied housing units, not including vacancies. The estimated number of households in 2016 is approximately 99,000.
/b/ The Proposed Plan factors in additional units that can be expected from the City's housing incentives. It assumes all units are occupied.
/c/ Under the Existing Plan's lower range for Reasonably Expected Development and SCAG's 2040 Growth Forecast, the numbers are similar but the geographic distribution of housing, population, and employment in the Community Plan Area would be different.
/d/ The SCAG 2040 Growth Forecast does not factor in potential additional units from the City's TOC Guidelines, which were adopted in 2017 after the adoption of the SCAG 2016/2040 RTP/SCS.
Note: Numbers are rounded to the nearest thousand.
SOURCE: SCAG, 2016-2040 RTP/SCS; City of Los Angeles, 2016, 2018.

In looking at the population figures in the table above, we find that zoned housing capacity under the existing plan appears to be more than enough to accommodate projected growth through 2040. We must ask why the HCPU and its accompanying CPIO rely so heavily on upzoning. If existing zoned capacity is enough to accommodate projected growth, why is it necessary to upzone large swaths of Central Hollywood? Rather than seeking to accommodate growth, the HCPU and CPIO appear designed to induce growth.

Land Use & Urban Form

The Draft HCPU Fails to Include a Meaningful Assessment of Homelessness

While the Hollywood area encompasses many different types of land uses, in talking about future development the focus must be on housing. Middle-income and low-income households are increasingly rent burdened, displacement is rampant, and homelessness has grown steadily.

In reviewing the HCPU, we were surprised that the Plan does not include any discussion of homelessness in the area. By our count, the word "homeless" appears only four times in the Plan. According to the 2020 Homeless Count conducted by LAHSA, the two council districts which include the majority of the Hollywood area contain thousands of homeless people. The 2020 Count states that there were 1,072 persons experiencing homelessness in CD 4, and 3,907 persons experiencing homelessness in CD 13. While the two council districts extend beyond the bounds of Hollywood, it seems fair to say a significant portion of these 4,979 people live in the Hollywood area. UN4LA members who live in Hollywood see people living on the streets every time they leave the house. While the Mayor and the City Council routinely tell us they're bending heaven and earth to address homelessness, the encampments we see on sidewalks, around parks and under freeways not only seem to be growing larger, they seem to be turning into permanent fixtures.

For the human beings living in makeshift shelters, dealing with hunger on a daily basis, struggling to get access to healthcare, survival has always been a challenge. But now mortality rates for homeless people in LA are soaring even higher. Almost a thousand homeless people died on LA's streets in 2019, and this year the numbers are spiking even higher.

She died on a sidewalk near where she grew up.
She was L.A.'s 959th homeless death this year
LA Times by Steve Lopez, September 26, 2020
https://www.latimes.com/california/story/2020-09-26/homeless-deaths-los-angeles-county

Because it does not include any serious discussion of homelessness in the Hollywood area, the HCPU fails to assess one of the most serious issues facing the community. In this respect it is gravely inadequate.

Land Use Goals

The HCPU lists the following as its first Land Use Goal:

Goal LU1:

Complete, livable and quality residential neighborhoods that provide a variety of housing types, densities, forms, and designs and a mix of uses and services that support the needs of residents throughout Hollywood.

This falls far short of the mark. The existing 1988 Hollywood Community Plan includes the following language among its Objectives:

Objective 3.
To make provision for the housing required to satisfy the varying needs and desires of all economic segments of the Community, maximizing the opportunity for individual choice.

While the HCPU includes a number of Land Use Goals related to housing, none of them sets the same standard as the language above. It is the City's responsibility to provide housing for "all economic segments of the Community", not to evade that responsibility by burying it under vague language, as in the following excerpt from the HCPU:

LU5.1
Individual choice and affordability. Provide a variety of rental and ownership housing opportunities for households of all income levels, sizes, and needs, including middle income and workforce populations. (P99)

This sounds good at first, but on closer reading we see that it does not promise housing, but rather "housing opportunities". This is not acceptable.

The City must replace the current language under LU1 with the language from Objective 3 of the 1988 Plan to ensure that the City understands its responsibility to people of Hollywood.

<u>The HCPU CPIO: The Failure of Upzoning and the Increase in Vacancy Rates</u>

The HCPU Community Implementation Overlay Plan relies heavily on upzoning to achieve the Plan's goals. Density bonusses are a major part of the City's strategy, with the promise that this will deliver desperately needed affordable housing. But the City has been freely handing out density bonusses for years, and yet housing prices remain outrageously high and waiting lists for affordable housing just seem to grown longer.

Though density bonusses have been one of City Planning's favorite tools over the past decade, the amount of affordable housing actually produced remains pathetically small. Here are the numbers from the DCP's Housing Dashboard.

[See next page.]

The City has also consistently fallen far short of the State's RHNA goals over the past seven years. See the following excerpt from the City's 2018 Housing Progress Report to the State of California.

Table B
Regional Housing Needs Allocation Progress
Permitted Units Issued by Affordability

Income Level		1 RHNA Allocation by Income Level	2 2013	2014	2015	2016	2017	2018	3 Total Units to Date (all years)	4 Total Remaining RHNA by Income Level
Very Low	Deed Restricted	20427		856	893	718	697	1101	4265	16162
	Non-Deed Restricted									
Low	Deed Restricted	12435		867	536	604	255	326	2588	9847
	Non-Deed Restricted									
Moderate	Deed Restricted	13728						154	430	13298
	Non-Deed Restricted			47	45	143	27	14		
Above Moderate		35412		13047	15833	12231	13040	19236	73387	
Total RHNA		82002								
Total Units				14817	17307	13696	14019	20831	80670	39307

Note: units serving extremely low-income households are included in the very low-income permitted units totals

While the City has produced more than double its RHNA allocation for Above Moderate Income Housing, it has not come anywhere near the goals for Moderate, Low Income or Very Low Income Housing.

While the City continues to tout density bonusses as an affordable housing solution, we must ask if the City has actually conducted a study to assess the results of this course of action. We have not been able to find any data showing that reliance on City or State density bonus provisions has led to a significant increase in affordable housing or a decline in rental prices in LA.

Instead, we believe that the City's practice of freely handing out density bonusses to developers has led to increasing speculation and rising rates of displacement. Developers are well aware that increasing the allowable density for a parcel automatically increases its value. It's

commonplace for developers who have received density bonusses to flip the property at a significant profit without building anything. This practice drives up land values and makes new construction increasingly costly.

Rather than increasing the supply of housing available to the average Angeleno, we believe the City's density bonus policies have encouraged speculation. Rather than building new units for people who need housing, many developers are building assets to increase the value of their portfolio. The Vacancy Report, a recent study produced by UCLA for Strategic Actions for a Just Economy (SAJE), shows that a number of LA communities have a high number of vacant housing units, a disproportionately number of them in newer, high-priced structures. Here's an excerpt from page 5:

"Simply put, new expensive housing remains disproportionately vacant, thereby failing to free up units for lower-income families. In addition to the intentional maintenance of overpriced units for rent or sale described above, the system of housing production in Los Angeles has created, on the one hand, a surplus supply of high-rent housing with elevated vacancy for new and higher-priced units, and on the other hand, a massive shortfall of low-cost housing that has contributed to the houselessness crisis."

On page 6, the report states that Hollywood is one of the areas with a high vacancy rate.

"[… V]acancy is concentrated in areas with hot housing markets and gentrification, including Downtown, Hollywood, East Hollywood, North Hollywood, Venice, and Koreatown, and in some of the city's Westside neighborhoods.

"A recent HCIDLA report corroborates these findings, noting that Hollywood, Venice, and Koreatown have a disproportionate share of the city's vacant units, and confirming that the data suggest "prolonged periods of housing units sitting idle in these neighborhoods." HCIDLA concludes that this is probably because these neighborhoods contain new, high-end units that are disproportionately vacant [….]"

On page 18 the report notes the correlation between displacement and high vacancy rates:

"[….] Ellis Act filings coincide spatially with high rates of vacancy and corporate ownership in Hollywood, East Hollywood, and Venice, which are experiencing rapid development and gentrification."

Follow the link below to view the full report.

The Vacancy Report from SAJE
https://www.saje.net/wp-content/uploads/2020/09/The_Vacancy_Report_Final.pdf

Extended Hours for Commercial Uses

The HCPU contains the following language regarding extending hours for commercial uses:

LU7.2 Extended use hours.
Encourage 24/7 or extended hour active commercial uses adjacent to Metro stations and major transit stops to create safe waiting environments for transit commuters. Discourage concentrations of commercial uses which have limited operating hours in areas with high pedestrian activity.

Given Councilmember O'Farrell's past efforts to extend operating hours for bars and nightclubs in Central Hollywood, this appears to be a transparent attempt to codify this practice to support future efforts in this direction. Trying to justify this shift by claiming that it would help create a safe environment for transit commuters is ridiculous. The City has routinely claimed that simply promoting pedestrian activity will reduce crime, but crime in Hollywood has risen significantly over the past seven years as the City has dumped a staggering number of alcohol permits on the area. DCP is now handing out alcohol CUPs 10 and 20 at a time (El Centro, Crossroads Hollywood).

According to recent COMPSTAT reports, Part I crime is Hollywood is about 10% higher than the Citywide average. Hollywood Crime Reporting Districts 646 and 657 have reported Part II crime rates that are 9 and 12 times higher than the Citywide average, respectively. Given the already high alcohol density in the Hollywood area and the excessively high crime rates, the HCPU should not be blindly promoting policies to extend hours for commercial operators, since bars and nightclubs will no doubt be the primary beneficiaries. LU7.2 should be removed.

<u>Noise Abatement/Rooftop Decks</u>

In its Introduction, the HCPU offers the following description of policies:

A policy is a clear statement that guides a specific course of action for decision makers to achieve a desired goal.

If the standard is to provide "a specific course of action for decision makers to achieve a desired goal", the following policies fall far short.

LU8.7 Noise abatement.
Consider requiring noise abatement plans for newly proposed entertainment venues requiring discretionary approval.

LU8.8 Rooftops.
Ensure that discretionary commercial rooftop uses within 500 feet of residentially zoned areas mitigate noise levels, which may include any necessary noise analysis reports in order to identify feasible mitigation.

These two policies do not come anywhere near what is needed to address noise in the Hollywood area, especially noise from venues that offer live entertainment. Live music from the W Hotel and the Dream Hotel are an ongoing nuisance. During the summer months music from the rooftop of the Dream Hotel can be heard in the early morning hours up to half a mile away.

Rather than saying they will "consider requiring noise abatement plans", City Planning needs to include strict conditions when approving entertainment venues and then those conditions must be enforced. The City Attorney's office needs to take action against repeat offenders. Random enforcement by the LAPD is not enough. Rather than blathering on about creating livable communities, the City needs to take firm action to ensure that working class people who need a good night's sleep are not awakened in the middle of the night by rowdy nightclub parties. Music on rooftop decks should be prohibited.

Mobility and Connectivity

The following language is included in the HCPU Introduction under the heading Grow Strategically:

Should the City's population continue to grow, as is forecasted by the Southern California Association of Governments (SCAG), growth should be focused in a number of higher-intensity commercial and mixed-use districts, centers, and boulevards, particularly in proximity to transportation corridors and transit stations. This type of smart, focused growth links development with available infrastructure and encourages more walkable, transit-friendly neighborhoods, helping to ease our reliance on the automobile, and minimize the need for new, costly infrastructure. [Emphasis added.]

This type language routinely occurs in all sorts of documents produced by City Planning, and in theory, it sounds great. UN4LA does support linking growth to transit infrastructure and encouraging compact communities to support active transportation. The problem here is that the promise and the reality are far apart. While the City has used this argument repeatedly to promote the approval of residential and commercial towers, in actuality the City has achieved less than nothing when it comes to transit use, and has no evidence to show any gains in active transportation. See below for recent ridership stats for Hollywood lines.

Line	FY07_Boardings	FY12_Boardings	FY17_Boardings
2/302	7,974,718	6,150,352	4,656,239
212	4,565,724	4,472,032	3,922,628
217	4,188,555	2,894,930	2,189,235
780	3,217,998	2,614,822	2,143,239

Systemwide Boardings	Total FY_1988	Total FY_2018
	430,212,003	390,933,379

The graphic above shows that substantial ridership declines have occurred on a number of Metro lines that serve the Hollywood area, including the 2/302, 212, 217, and 780. While the data above only extends through 2017, the losses have continued since then. The City's efforts to promote transit-oriented development (TOD) have been a miserable failure. This is made abundantly clear in the following report from UCLA's Institute of Transportation Studies:

Falling Transit Ridership
https://www.its.ucla.edu/2018/01/31/new-report-its-scholars-on-the-cause-of-californias-falling-transit-ridership/

The report shows that transit ridership in the SCAG region has fallen steadily over the past 10 years, while car ownership has increased dramatically since 2000.

We are not arguing against planning for higher density near transit. We are saying that the City's efforts so far have accomplished less than nothing, and that the HCPU needs to

acknowledge this. To continue pretending that the City's efforts along these lines have been a success, and to promise more of the same, will only extend the damage.

At the same time, the City must start to collect and report data on active transportation. The Mobility Plan actually instructs City departments to start this process and to produce regular reports, but to our knowledge this has never happened. When the latest high-end high-rise is being presented for approval, City Planning invariably argues that it will promote walking and biking, but DCP staff has never presented a shred of evidence to show that gains have been achieved in these areas.

In the State of California it is widely accepted that climate change is a serious threat and that we must take action to reduce greenhouse gas emissions. Los Angeles City officials frequently proclaim their commitment to fighting climate change. But instead of planning based on real data to show actual progress in this area, we get empty promises that have nothing to do with reality.

The HCPU's talk of "smart, focussed growth" merely continues this pattern of empty promises. In order to achieve real gains, the HCPU must:

- *Acknowledge that transit ridership in the Hollywood area has fallen steadily for the past seven years, in spite of the addition of thousands of new housing units and dozens of businesses near transit stops.*

- *Begin immediately to study why the City's efforts have failed. The City must pinpoint the problems and adopt new policies that will lead to actual gains for transit usage.*

- *The City must follow through on the Mobility Plan's proposal to gather data and report on active transportation. This data is necessary to promote planning that will actually reduce reliance on cars.*

In its current form, the HCPU fails to recognize the serious challenges facing the Hollywood area, and does not acknowledge past planning failures. It does not address the reality that Hollywood residents live every day. The HCPU should be withdrawn and substantially rewritten to address these problems.

Linda Lou <linda.lou@lacity.org>

Submission Of Vedanta Society Of Southern California Regarding Proposed Hollywood Community Plan Update / (HCPU2)

2 messages

akornarens@aol.com <akornarens@aol.com> Wed, Dec 16, 2020 at 12:03 PM
Reply-To: akornarens@aol.com
To: "hollywoodplan@lacity.org" <hollywoodplan@lacity.org>
Cc: "linda.lou@lacity.org" <linda.lou@lacity.org>

Please see attached Submission Of Vedanta Society Of Southern California Regarding Proposed Hollywood Community Plan Update / (HCPU2).

CityOfLA Planning 121620.pdf
16143K

Linda Lou <linda.lou@lacity.org>
To: akornarens@aol.com
Cc: "hollywoodplan@lacity.org" <hollywoodplan@lacity.org>

Hello Anthony,

Thank you for your comment letter. It has been received and filed.

Best,

Linda

Linda Lou
Pronouns: She/Her/Hers
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December 16, 2020

VIA EMAIL
hollywoodplan@lacity.org;
linda.lou@lacity.org
Los Angeles City Planning
Community Planning Bureau
200 North Spring Street, Room 667
Los Angeles, CA 90012

Re: Submission Of Vedanta Society Of Southern California Regarding Proposed Hollywood Community Plan Update / (HCPU2)

Dear Ms. Lou and Community Planning Bureau:

This firm and the undersigned represents Vedanta Society of Southern California ("VSSC"), a California non-profit religious corporation which since the 1930's has owned and operated a monastery, shrine and other facilities in Hollywood between Vine Street and Ivar that is contained within the area of the proposed new Hollywood Community Plan Update ("Plan Update" or "HCPU2").

VSSC objects that the proposed Plan is in error, is not supported by substantial evidence and otherwise fails to comply with the law.

VSSC further objects that the proposed certification of the final Environmental Impact Report is improper, premature and constitutes a failure to proceed in the manner required by law, both procedurally and substantively.

Without limiting the forgoing, VSSC objects on the basis that the Lead Agency does not have adequate information to approve the Plan Update or to certify the draft Environmental Impact Report ("DEIR").

The Plan Update cannot be approved as currently formulated because there are active fault traces in the Regional Center CPIO Subarea. The record contains substantial evidence of those traces. The DEIR ignores much of this evidence. The DEIR also ignores or improperly addresses the incomplete evidence it recognizes and otherwise does not follow state and local law.

The additional studies of the Project Area confirm there is an active fault definitely traversing the area of the Plan Update where the most concentrated development is proposed. This area has been identified as the Regional Center CPIO Subarea. This includes writings from the California Geological Survey (CGS), the United States Geological Survey and other authoritative bodies that indicate the presence serious seismic hazards unique to this area. The draft DEIR does not even mention these studies. At the same time, it concludes based on a combination of flawed logic, platitudes, a misreading of the law and an incomplete record that no mitigation measures are required since the skyscraper canyon proposed for the Regional Center CPIO Subarea ostensibly raises no meaningful seismic issues. This conclusion would almost be laughable but for the fact that lives certainly will be lost if it is accepted.

No findings or legally proper reason justifies the failure to include and properly analyze the required information prior to certification of a final Environmental Impact Report. CEQA requires this based on the facts in the record in this matter. The final Environmental Impact Report cannot be certified until all required environmental review is incorporated and candidly analyzed and a new EIR made available as part of the public CEQA process at this time.

VSSC will focus on the seismic issues that require the proposed Plan and the draft EIR not be approved at this time.

1. "The fundamental purpose of an EIR is 'to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment.' (§21061) To that end, the EIR 'shall include a detailed statement setting forth…[¶]…[a]ll significant effects on the environment of the proposed project.' (§21100(b)(1).)" (*Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* [2007] 40 Cal.4th 412, 428) "CEQA's demand for meaningful information 'is not satisfied by simply stating information will be provided in the future.' [Citation.]" (Id. at p. 431.) "Under CEQA's standards for the adequacy of EIR's, an EIR must 'be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences.' ([CEQA] Guidelines, [Cal. Code Regs., tit. 14,] §15151.)" (*Planning & Conservation League v. Castaic Lake Water Agency* [2009] 180 Cal.App.4th 210, 242.) "'If a final environmental impact report (EIR) does not "adequately apprise all interested parties of the true scope of the project for intelligent weighing of the environmental consequences of the project," informed decisionmaking cannot occur under CEQA and the final EIR is inadequate as a matter of law. [Citations]'" (*Communities for a Better Environment v. City of Richmond* [2010] 184 Cal.App.4th 70, 82–83.)

2. The draft environmental impact report (EIR) must contain a project description. Cal. Code Regs., tit. 14, § 15124. That project description must include (a) the precise location and boundaries of the proposed project, (b) a statement of the objectives sought by the proposed project, (c) a general description of the project's technical, economic and environmental characteristics, and (d) a statement briefly describing the intended use of the EIR. §15124, subds. (a)-(d). This description of the project is an indispensable element of both a valid draft EIR and final EIR. That project description must be *accurate, stable and finite*. (*stopthemillenniumhollywood.com v. City of Los Angeles* [2019] 39 Cal.App.5th 1, 16, citing CCR 14, §15124(a)–(d) (Italics added). Thus, ""[i]f an EIR fails to include relevant information and precludes informed decisionmaking and public participation, the goals of CEQA are thwarted and a prejudicial abuse of discretion has occurred." (Id. at 18, citing *Save Our Peninsula Committee v. Monterey County Bd. of Supervisors* [2001] 87 Cal.App.4th 99, 128.)

3. VSSC recognizes that the Hollywood Community Plan Update EIR is a "program" (not "project") DEIR, so it is more general. Still, a program EIR must disclose and analyze the reasonably foreseeable impacts of whatever the program (in this case the HCPU) may cause. By not properly disclosing and analyzing the facts of the May 8, 2020 US Geological Survey study [attached as Exhibit 1], and the July 16, 2020 California Geological Survey objection letter [attached as Exhibit 2] regarding the proposed Hollywood Center (Millennium) project (which letter also has broader application to Hollywood in general, including reaffirming that the Hollywood Earthquake Fault is active), and thus creating the false baseline impression that a swath of land running through Hollywood where the major active fault is known to exist is buildable with habitable structures with no mitigation meaures -- when it is not -- actually induces more development by suppressing this critical information. Thus, the DEIR fails as an informational document under CEQA because it omits critical information.

4. As with any EIR, a program EIR such as the proposed Plan Update must provide decision-makers with "sufficient analysis to intelligently consider the environmental consequences of the project," and designating the EIR as a program EIR in itself does not decrease the level of analysis otherwise required. (*Cleveland Nat'l Forest Found. v San Diego Ass'n of Gov'ts* [2017] 17 Cal App. 5th 413, 426.) A lead agency preparing a program EIR must disclose what it reasonably can, and any determinations that it is not feasible to provide specific information must be supported by substantial evidence. (17 Cal.App.5th

at 440 [rejecting air quality baseline discussion and impact analysis because substantial evidence did not support agency decision to omit more detailed analysis]; See generally *Center for Biological Diversity v Department of Conserv.* [2019] 36 Cal.App.5th 210, 231, citing *Sierra Club v County of Fresno* [2018] 6 Cal.5th 502, 516,) and stating that a program EIR must include enough detail "to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project.")

5. *Cleveland Nat'l Forest Found.,* 17 Cal.App.5th at 426 explains that to fulfill its information disclosure function, "an EIR must delineate environmental conditions prevailing absent the project, defining a baseline against which predicted effects can be described and quantified." (*Smart Rail, supra*, 57 Cal.4th at p. 447; see *County of Amador v. El Dorado County Water Agency* [1999] 76 Cal.App.4th 931, 953 [without an adequate baseline description, "analysis of impacts, mitigation measures and project alternatives becomes impossible"]; Guidelines, § 15125, subd. (a).) If the description of the environmental setting " 'is inaccurate, incomplete or misleading, the EIR does not comply with CEQA. [Citation.] "Without accurate and complete information pertaining to the setting of the project and surrounding uses, it cannot be found that the [EIR] adequately investigated and discussed the environmental impacts of the development project." ' " (*Clover Valley Foundation v. City of Rocklin* [2011] 197 Cal.App.4th 200, 219.)
. . . .

"The fact more precise information may be available during the next tier of environmental review does not excuse SANDAG from providing what information it reasonably can now. (Guidelines, § 15144.) Moreover, if known impacts are not analyzed and addressed in a program EIR, they may potentially escape analysis in a later tier EIR. (§ 21166; *Citizens Against Airport Pollution v. City of San Jose*, supra, 227 Cal.App.4th at pp. 807--808; *Concerned Dublin Citizens v. City of Dublin*, supra, 214 Cal.App.4th at p. 1320; *Citizens for Responsible Equitable Environmental Development v. City of San Diego*, supra, 196 Cal.App.4th at pp. 531-532; *Fort Mojave Indian Tribe v. Department of Health Services*, supra, 38 Cal.App.4th at p. 1605.) We, therefore, conclude there is not substantial evidence to support SANDAG's determination it could not reasonably provide additional baseline information in the EIR about TACs exposures and the location of sensitive receptors. The error is prejudicial because it precluded informed public participation and decisionmaking. (§ 21005, subd. (a); City of Maywood, supra, 208 Cal.App.4th at p. 386.)"

6. The same logic applies to the DEIR for the Plan Update.

7. The DEIR omits relevant information including recent federal and state studies and authoritative expert opinions, including from the City's own Department of Building And Safety. It then concludes that no seismic mitigation measures are required since the project will have no impact on current seismic and other geologic conditions that can endanger human life and structures. (DEIR section 4.6-14 through 4.6-14-19). This extraordinary conclusion is based on an erroneous reading of the scope of CEQA, and the cases interpreting it, the omission of key authoritative information, and a patently flawed analysis of the information the DEIR contains.

8. The DEIR's conclusion that no seismic mitigation measures are required is not supported by the incomplete record. In fact, the evidence contained in the incomplete record contradicts that conclusion.

9. This includes compelling record evidence that there are serious seismic issues raised by permitting increased density and high rise buildings in the Regional Center CPIO Subarea of the Plan Update.

    a. California Geological Survey (July 16, 2020 CGS letter), relying on new subsurface data from the United States Geological Survey that was *not* previously available, which indicate potentially four (4) fault traces crossing the Regional Center CPIO Subarea of the Plan Update). (Exhibit A hereto)

    b. U.S. Geological Survey (USGS) Open-File Report, May 8, 2020, entitled "2018 U.S. Geological Survey–California Geological Survey Fault- Imaging Surveys Across the Hollywood and Santa Monica Faults, Los Angeles County, California" which identifies several new splays of the known-active Hollywood Fault. (Exhibit B hereto)

    This is highly pertinent to the proposed Regional Center CPIO Subarea of the Plan Update and its Draft EIR because the proposed Plan Update would permit many high-rise buildings to be constructed on top of and/or astride the known-active Hollywood Fault.

This could "cause substantial adverse effects on human beings, either directly or indirectly" (CEQA Guidelines Section 15065(a)(4)), and also on the surrounding environment including to humans, other buildings, and streets and infrastructure if the proposed towers were to collapse due to seismic uplift or intense ground shaking.

c. Wilson Geosciences report, which itself attaches the May 8, 2020 new USGS report and data and concludes that the Hollywood Fault as a continuous unit is active. (Exhibit C hereto)

d. Two LADBS memos authored by Daniel Schneidereit, Engineering Geologist II, Los Angeles Department of Building and Safety, including August 7, 2020 Inter-Departmental Correspondence for the Hollywood Center project that is proposed to be built in the proposed Regional Center CPIO Subarea of the Plan Update "acknowledg[ing] the CGS's concern and [that we] believe the best way to resolve this issue is for the developer to excavate another exploratory trench to demonstrate, or rule out, the presence of an active fault in the southerly part of the site. The trench needs to be approximately 30 feet deep or more to expose the necessary strata, and may require the use of shoring." (See also September 9, 2020 memo, stating "a geologic fault exploration trench shall be excavated in the suspected area to demonstrate, or rule out, the presence of an active fault prior to the DBS' approval of this project." (Exhibit D hereto)

e. Robert Sydnor expert letter ("The new information from the California Geological Survey's comment letter and the United States Geological Survey's report show that a "substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance." (CEQA Guidelines §15088.5(a)(2)) They also show that feasible project alternatives or mitigation measures "considerably different from others previously analyzed [in the current Draft EIR – such as placing buildings off of and far enough away from any and all active fault lines –] would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it." (CEQA Guidelines Section 15088.5(a)(3).") (Exhibit E hereto)

10. No substantial evidence merits omitting this key information. (*Cleveland Nat'l Forest Found.,* 17 Cal.App.5th at 426). The error is

prejudicial because it precludes informed public participation and decisionmaking. (Id., citing Govt Code §21005(a); *City of Maywood v. L.A.U.S.D* [2012] 208 Cal.App.4th 362, 386.)

11. The DEIR's determination that no seismic mitigation measures are required is also irreconcilable with the City's own guidelines regarding seismic safety. (See discussion infra.)

12. The DEIR also is legally flawed in repeatedly stating that seismic issues are not within CEQA's purview because they deal with the environment's impact on the project's impact on the environment.

13. Where, as here, relevant to the project's technical, economic and environmental characteristics, geological and seismic conditions are within the purview of CEQA and **must be addressed**. (CEQA Guidelines, 14 CCR §15125[a]) An EIR must include a description of the physical environmental conditions in the vicinity of the project. *Neighbors for Smart Rail v. Exposition Metro Line Construction*

Authority [2013] 57 Cal.4th 439, 472, fn. 5 ["seismicity" was one of the matters reviewed in the EIR at issue "consistent with CEQA requirements" {citing CEQA Guidelines, §15125(a)}]) This includes the seismic investigation issue discussed below, which the Lead Agency (City of Los Angeles) has correctly recognized (at least until now) must be evaluated (*Cadiz Land Co. v. Rail Cycle* [2000] 83 Cal.App.4th 74, 98-100; see CEQA Guidelines Appendix G, which includes several questions relating to seismic safety and whether a project may increase exposure of people to risks such as earthquake and liquefaction. Appendix G (VII) (Geology and Soils)).

14. CEQA Guidelines §15126.2(a) and the statutes from which it is derived are valid and binding under *California Building Industry Assn. v. Bay Area Air Quality Management Dist.* [2015] 62 Cal.4th 369, which partially upheld and partially invalidated an earlier version of §15126.2(a) which stated that *all* EIR's "on a subdivision astride an active fault line should identify as a significant effect the seismic hazard to future occupants of the subdivision."

15. In language applicable to the proposed Hollywood Plan Update, the Court held that *Pub. Resources Code* §§21096, 21151.8, 21159.21(f),(h), 21159.22, (a),(b)(3), 21159.23(a)(2)(A), 21159.24(a)(1), (3), and 21155.1(a)(4), (6), constitute specific exceptions to the general rule of the California Environmental Quality Act, Pub. Resources Code, § 21000 et seq., requiring consideration only of a project's effect on the environment, not the environment's effects on project users. Accordingly, despite the incorrect statement of law in the DEIR, the proposed Hollywood Plan falls squarely within these statute's specific exception to the general rule of CEQA. (*California Building Industry Assn.* 62 Cal.4th at 392.). The DEIR does not consider the seismic

hazard to future occupants of the Plan Area (especially the CPIO) were the Plan Update implemented.

16. That statute "reflect[s] an express legislative directive to consider whether existing environmental conditions might harm those who intend to occupy or use a project site." (62 Cal.4th at 391). As our Supreme Court recognized: "A separate cluster of statutes limits the availability of CEQA exemptions where future residents or users of certain housing development projects may be harmed by existing conditions. These limits on exemptions extend to projects located on sites that will expose future occupants to certain hazards and risks—including the release of hazardous substances and sites subject to wild land fire, *seismic*, landslide or flood hazards—unless (in some cases) the hazards and risks can be removed or mitigated to insignificant levels. (E.g., §§ 21159.21, subds. (f), (h), 21159.22, subds. (a), (b)(3) [agricultural employee housing], 21159.23, subd. (a)(2)(A) [*affordable to low-income housing*], 21159.24, subd. (a)(1), (3) [*infill housing*].) (Id.) (*Italics added*). These statutory and regulatory (Guideline §15126.2[a]) limits on exemptions govern the Plan Update.

17. This is consistent with the City of Los Angeles CEQA Thresholds Guide (2006) which require, among other things, requires that geological issues be fully analyzed and conclusions reached and mitigation measures fully developed before approval; including analysis of the following key questions: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking, including liquefaction? Are there geologic hazards associated with the project site that exceed the typical risk of hazard for the region? If so, the project would have significant geologic impacts that require the design and study of specific mitigation measures before project approval.

18. A significance threshold must be determined. Conclusions must be reached as to whether the project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. The geologic processes that may result in geologic hazards on the project site or in the surrounding area must be identified. The requirements and/or policies for geologic hazards that apply to the project site must be summarized.

19. The City is required to consider Alquist-Priolo Special Study Zones and Fault Rupture Study Areas, published reports, or other appropriate maps or studies, as available to assess whether the project is located in an area susceptible to geologic hazards. It has not done so, and indeed, expressly failed properly to do so by its failure to recirculate the Draft EIR to include the May 8, 2020 United States Geological Survey study, and the July 16, 2020 California Geological Survey comment letter and new information. Design and structural features that exceed the requirements of the Los Angeles Building Code and Planning and Zoning Code are required. These and many other matters cannot be deferred until after project approval.

20. The geological assessment of the Project is incomplete and does not comply with the current City of Los Angeles CEQA Thresholds Guide for Geologic Hazards. The Thresholds Guide requires these issues be fully analyzed and conclusions reached and mitigation measures fully developed before approval of the Plan Update. (See Exhibit F.)

21. The proposed plan approval does not contain these findings, nor does it adequately describe or incorporate all feasible mitigation, nor are there findings that once all feasible mitigation is incorporated, the impacts are below the significance threshold or have otherwise been properly mitigated.

22. Instead, the proposed Plan Update improperly states that no mitigation measures are required, without following the law or basic logical principles.

23. The current version of CEQA Guidelines §15126.2(a) (14 CCR 15126.2) mandates that "[t]he EIR shall also analyze any significant environmental effects the project might cause or risk exacerbating by bringing development and people into the area affected. For example the EIR should evaluate any potentially significant direct, indirect, or cumulative environmental impacts of locating development in areas susceptible to hazardous conditions (e.g., floodplains, coastlines, wildfire risk areas), including both short-term and long-term conditions, as identified in authoritative hazard maps, risk assessments or in land use plans, addressing such hazards areas." The DEIR therefore is required to analyze the significant environmental effects the project might cause or risk exacerbating by bringing development and people into the project area that is affected by seismic issues. (*In re Alanna A.* [2005] 135 Cal.App.4th 555, 563 ["[u]se of the mandatory

language "shall" indicates a legislative intent to impose a mandatory duty; no discretion is granted.]) The DEIR does not do so.

24. CEQA promotes informational and substantive protections for the environment and for all members of the public. (*California Building Industry Assn.,* 62 Cal.4th at 382-383. The DEIR's omission of critical earthquake fault information impedes both purposes. As a result, "[t]he public was deprived of a full understanding of the environmental issues raised by the . . . project proposal." (*Banning Ranch Conservancy v. City of Newport Beach* [2017] 2 Cal.5th 918, 942.) That is not much ado about nothing. It is about protection of the public and the process. When information is not disclosed, prejudice to the public is presumed. (*Sierra Club v. State Bd. of Forestry* [1994] 7 Cal.4th 1215, 1236-1237.)

25. Also, the Alquist-Priolo Earthquake Fault Zoning Act, Pub. Resources Code, § 2621 et seq., prohibits the construction of structures for human occupancy across the trace of an active fault or within 50 feet of an active fault. (*California Oak Foundation v. Regents of University of California* [2010] 188 Cal.App.4th 227, 248 "[{t}he Alquist-Priolo Act applies broadly to "any project … which is located within a delineated earthquake fault zone, upon issuance of the official earthquake fault zone maps to affected local jurisdictions, except as provided in Section 2621.7."(§2621.5(b).) "[P]roject" is defined to include "[s]tructures for human occupancy." (§2621.6(a)(2).)])

26. The DEIR acknowledges that the Alquist-Priolo Act prohibits the construction of structures for human occupancy across the trace of an active fault or within 50 feet of an active fault. It states this Act "was intended to provide citizens of the state with increased safety and to minimize the loss of life immediately during and after earthquakes." It admits that "before a project can be permitted within an Alquist-Priolo Earthquake Fault Zone, the City of Los Angeles requires a geological investigation to be performed to demonstrate that proposed building(s) will not be constructed across active faults. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (generally 50 feet)." (DEIR, 4.6-1/4.6-2)

27. The DEIR acknowledges some of the requirements of the Seismic Hazards Mapping Act, including the mandate that "the State Geologist is required to delineate 'seismic hazard zones' [and that] cities and counties must regulate certain development projects [including, generally "structures for human occupancy"] within these zones to ensure that geologic and soils conditions are investigated and appropriate mitigation measures, if any, are incorporated into development plans." (DEIR, 4.6-2)

28. The DEIR also acknowledges the Safety Element of the City's General Plan (as required by state law) "includes a Safety Element, which addresses the issue of protecting its people from unreasonable risks associated with natural disasters (i.e. fires, floods and earthquakes). The Safety Element of the General Plan contains policies that emphasize seismic safety issues because seismic events present the most widespread threat of devastation to life and property. The Safety Element presents a contextual framework for understanding the relationship between hazard mitigation, response to a natural disaster, and initial recovery from a natural disaster. Policy 1.1.6 of the Safety Element addresses compliance with applicable state and federal planning and development regulations (e.g. Alquist-Priolo Act, Seismic Hazards Mapping Act, and Cobey-Alquist Flood Hazard Mapping Act.)" (DEIR, 4.6-3)

29. The City's Safety Element, in turn, states at II-I that "Concentration of development and infrastructure has increased the vulnerability of greater numbers of people, businesses and facilities to seismic, fire and flood events while at the same time providing greater resources for responding to such events. As to "Seismic Events," the Plan recognizes that "The programs associated with this Safety Element emphasize seismic safety issues because seismic events present the most widespread threat of devastation to life and property. With an earthquake, there is no containment of potential damage, as is possible with a fire or flood. Unlike a fire or flood whose path often can be generally measured and predicted, quake damage and related hazard events may be widespread and, at present, are unpredictable. Related hazard events could occur anywhere in the quake area including inundations from damaged reservoirs or release of hazardous materials, such as gas, which in turn could lead to fires or form toxic clouds." Te Safety Element continues at II-20: "It is known that the complex Los Angeles fault system interacts with the alluvial soils and other geologic conditions in the hills and basins. This interaction appears to pose a potential seismic threat for every part of the City, regardless of the underlying geologic and soils conditions. Structural damage does not occur due to any one factor. The duration and intensity of the shaking, distance from the epicenter, composition of the soil and type of construction, all are factors in determining the extent of damage which may occur. Alluvial and artificially uncompacted soils tend to amplify the shaking. Shallow ground water, combined with uncompacted soils can result in liquefaction (quicksand effect) during a strong quake. Therefore, it is difficult to escape the impacts of a quake."

30. "Hazard assessment. The State Public Resources Code Section 2699 requires that a safety element "take into account" available seismic hazard maps prepared by the State Geologist pursuant to the Alquist-Priolo Earthquake Fault Zoning Act of 1972, subsequently amended (Public Resources Code Sections 2621-2630, originally known as the Alquist-Priolo Special Studies Zones Act) and the Seismic Hazard Mapping Act of 1990, subsequently amended (Public Resources Code Sections 2690- 2699.6 and 3720-3725). The Alquist-Priolo Act was established as a direct result of the 1971 San Fernando earthquake. It requires that the State Geologist map active faults throughout the State. Those maps which are applicable to the City of Los Angeles are incorporated into Exhibit A of this Safety Element."

31. Safety Element Exhibit A (titled "Alquist-Priolo Special Study Zones & Fault Rupture Study Areas In the City of Los Angeles") shows that substantial portions of the Regional Center CPIO Subarea within an Alquist-Priolo Special Studies Zone). Exhibit B confirms this is also one of several "Liquefiable Areas" including "recent alluvial deposits; ground water less than 30 feet deep."

32. The Hazard Mapping Act requires the State Geologist to map areas subject to amplified ground shaking (or conditions which have potential for amplified ground shaking), liquefaction and landslide hazard areas. Following the 1994 Northridge earthquake, the hazard mapping program was revised and accelerated.....Local jurisdictions are required by the Mapping Act *to require* additional studies and appropriate mitigation measures for development projects *in areas identified as potential hazard areas by the maps*." (Italics added). The Plan Update Area comprises one such hazard area. Mitigation measures are required. The DEIR overlooks this most basic point.

33. The State Geologist, in turn, has prepared a hazard map in which substantial portions of the Regional Center CPIO Subarea are identified as being within active fault areas.

34. The recent California Geological Survey letter (dated July 16, 2020) states there are active faults on the project site, the site should be presumed to be crossed by active fault lines. (*California Building Industry Assn.* 62 Cal.4th at 388, Guidelines §15126.2(a), "areas susceptible to hazardous conditions" can be "identified in authoritative hazard maps"). This is consistent with what the proposed Plan Update states.

35. Accordingly, under many laws (and the City's Safety Element), geologic and soils conditions are required to be investigated and appropriate mitigation measures, if any, are incorporated into development plans.

36. In recognition of this "most widespread threat of devastation to life and property," Policy 1.1.6 of the Safety Element requires that the City "Assure compliance with applicable state and federal planning and development regulations, *e.g.*, Alquist-Priolo Earthquake Fault Zoning Act, State Mapping Act and Cobey-Alquist Flood Plain Management Act. [All EOO natural hazard enforcement and implementation programs relative to non-City regulations implement this policy.]".

37. After acknowledging all of these requirements, the DEIR essentially ignores them; suggesting that these concerns can be dealt with in the future. As such, the DEIR fails as an informational document for this reason alone.

38. As a matter of law, and as the DEIR admits, the DEIR must analyze the significant seismic environmental impacts the Plan Update might cause or risk exacerbating by bringing massive amounts of high rise residential housing to a project site that two governmental agencies have indicated is underlaid with active, near-surface earthquake faults and which within an Alquist-Priolo Earthquake Fault Zone. Following the required investigation, the seismic hazards to which future residents of the Regional Center CPIO Subarea may be subject must be analyzed and measures proposed at this time to remove the risks or to mitigate them to insignificant levels. Pretending that no mitigation measures are needed – while also relying on possible future mitigation– does not suffice. It cuts corners and endangers lives.

39. Emphasizing the ruling that a project's impacts on the existing environment must be studied, the Supreme Court said: "Moreover, and consistent with CEQA's general rule, we note that the statute does not proscribe consideration of existing conditions. In fact, CEQA calls upon an agency to evaluate existing conditions in order to assess whether a project could exacerbate hazards that are already present. Accordingly, we find that the following sentences of Guidelines section 15126.2(a) – challenged by CBIA as unauthorized under the statute – are valid under CEQA: "The EIR shall also analyze any significant environmental effects the project might cause by bringing development and people into the area affected. . . . Similarly, the EIR should evaluate any potentially significant impacts of locating development in other areas susceptible to hazardous conditions (e.g., floodplains, coastlines, wildfire risk areas) as identified in authoritative hazard

maps, risk assessments or in land use plans addressing such hazards areas.'" (*California Building Ind. Assn,* 62 Cal.4th at 388.)

40. This applies to the official, 2014 Alquist Priolo Map showing the active Hollywood earthquake fault crossing the Plan site containing the largest concentration of high-rise structures (the Regional Center CPIO Subarea).

41. Thus, a project's impacts on the existing environment, including hazardous conditions to which development and people are brought, are proper subjects for CEQA review as the Supreme Court held in *California Building Ind. Assn,* 62 Cal.4th 369. There is no question here that the revised Plan Update will bring more people and significantly greater development to the Regional Center CPIO Subarea site and its surroundings than presently exist. There also is no question that the impacts that seismic events may have on those people (including elderly persons) must be considered under CEQA. There also is no question that the DEIR errs as a matter of law in repeatedly stating otherwise.

42. With skyscrapers, other high-ride buildings and increased density proposed for the Regional Center CPIO Subarea of the Plan Update, a high-rise collapse in an earthquake will not only place future occupants at unacceptable risk under the City's General Plan Safety Element ([Safety Element policies]), but will affect the nearby buildings, structures and public rights of way and services (such as streets and utilities). These potential impacts on the existing environment fall within *CBIA's* holding that seismic and other reasonably foreseeable hazardous impacts on the existing environment from a project are properly studied under CEQA.

43. These authorities and the conditions imposed on the approval preclude the City from claiming that a proper seismic analysis is not necessary under CEQA.

44. Instead, the DEIR states that no seismic mitigation measures are required for the Plan Update area, including the Regional Center CPIO Subarea of the Plan Update. (Section 4.6)

45. But the DEIR also acknowledges that the Hollywood fault runs in portions of the Project Area, including in the Regional Center CPIO Subarea of the Plan Update. Moreover, it states that buildings in the area may be constructed up the sidewalks and that no set-backs are

required in this subarea. The buildings may be high-rise and density may substantially increase.

46. But there is substantial evidence that mitigation measures are required, thereby showing the DEIR's conclusion that no mitigation measures are required is incorrect as a matter of law.

47. CEQA requires that seismic issues be investigated and addressed by mitigation measures if this Plan Update is to be valid. (*Oakland Heritage Alliance v. City of Oakland* [2011] 195 Cal.App.4th 884, 908-909). (see also, *City of Los Angeles CEQA Thresholds Guide for Geologic Hazards* [Ex. F] and discussion, supra)

48. Rather than cogently addressing how these benchmarks apply specifically to the Regional Center CPIO Subarea of the Plan Update, the DEIR here states in the broadest terms that "[t]he Project Area may be exposed to strong ground shaking during a seismic event since it is within the seismically active Southern California region." (4.6-4)

49. On the very next page (4.6-5), the DEIR for the proposed Plan Update acknowledges that the Hollywood Fault is one of "the major active earthquake faults in the Southern California region" and estimates a maximum magnitude seismic event of 6.5. The DEIR acknowledges that "[t]he Hollywood Fault traverses the Project Area." (Id.). It states that "within the Project Area, the Hollywood Alquist-Prioto Earthquake Fault Zone generally encompasses the area surrounding Sunset Boulevard in the western portion of the Project Area, Franklin Avenue Yucca Street, Carlos Avenue, Hollywood Boulevard, and Los Feliz Boulevard in the eastern portion of the Project Area. (Id.) The following two pages show the active Hollywood earthquake fault in the Regional Center CPIO Subarea of the Plan Update in addition to another fault.(See Figure 4.6-1 "Active Faults"). This admits that there are active faults in substantial portions of the Regional Center CPIO Subarea of the Plan Update.

50. No matter how characterized, the proposed Plan Update's failure to address this overwhelming evidence (and its omission of the 2020 evidence and studies) while at the same time recommending approval of the proposed Plan Update violates CEQA. (Guidelines §15126.2(a): "The EIR shall also analyze any significant environmental effects the project might cause by bringing development and people into the area

affected....Similarly, the EIR should evaluate any potentially significant impacts of locating development in other areas susceptible to hazardous

conditions (e.g., floodplains, coastlines, wildfire risk areas) as identified in authoritative hazard maps, risk assessments or in land use plans addressing such hazards areas.")

51. The standard of review is whether the evidence supports a fair argument that further testing would not merely be helpful, but would be necessary to formulate an adequate mitigation measure. (*Save Agoura Cornell Knoll v. City of Agoura Hills* [2nd Dist, 2020] 46 Cal.App.5th 665, 693-694, Id. at 674, 676) (see also Id. at 692 [affirming issuance of a peremptory writ of mandate directing the City to set aside project approvals on the basis that "the record contains substantial evidence to support a fair argument that this measure is inadequate to mitigate the potential impacts" of the project]).

52. Expert opinion such as contained in this record supports a fair argument that further study is required. (Id. at 689, citing *Pocket Protectors v. City of Sacramento* [2004] 124 Cal.App.4th 903, 928 ["expert opinion if supported by facts, even if not based on specific observations as to the site under review"may qualify as substantial evidence supporting a fair argument].)

53. After the required analysis, an EIR must include proposed mitigation measures designed to minimize the project's significant environmental impact. (*Pub Res C* §§21002.1(a), 21100(b)(3); 14 *CCR* §15126.4(a)(1).). *None* are included in the DEIR.

54. The CEQA Guidelines provide a broad definition of mitigation, including actions taken to rectify or compensate for a significant impact. Under 14 *CCR* §15370, "mitigation" includes: (1) avoiding an impact altogether by not taking a certain action or part of an action; (2) minimizing an impact by limiting the magnitude of a proposed action and its implementation; (3) rectifying an impact by repairing, rehabilitating, or restoring the affected environmental resource; (4) reducing or eliminating an impact over a period of time through preservation or maintenance operations during the life of the action; and (5) compensating for the impact by providing substitute resources or environments. At minimum, factors (1) and (2) above pertain to mitigation of seismic impacts under the CEQA Guidelines.

55. Mitigation measures under Cal. Code Regs., tit. 24, §1802.2.7, can include ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements, or any combination of these measures. Cal. Code Regs., tit. 24, §1802.2.7.

56. The California Geological Survey questioned the project's impacts on public health, safety and welfare, including because the 7.0 magnitude, surface rupture, active Hollywood Earthquake Fault runs directly through the site, as officially mapped in the State's Alquist-Priolo Earthquake Fault Zone Map (official map and State Fault Evaluation Report 253 and supplement ["FER 253]") Those concerns are even more well founded today given the current iteration of this project. The current proposed Plan Update places skyscrapers astride and adjacent to the earthquake fault. In fact, these skyscrapers are bisected by the earthquake fault, and based on the proposed Plan Update documents, at least some of the building footprints appear to be in the 50-foot restricted Alquist-Priolo setback zones.

57. The State provided an administrative appeal period for anyone to challenge the new Alquist-Priolo Map's findings. No participant in this process has sought to argue for a change in the active fault designation through the site. The City has forfeited any ability to challenge that identification and the official mapping by the California Geological Survey of the active Hollywood Earthquake Fault through the site is final, and it must be treated as such. Any revisiting of CGS's official 2014 Map and findings is barred as a matter of law by collateral estoppel and the doctrine of failure to exhaust administrative remedies regarding the long-since-expired appeal period to challenge the official, 2014 Alquist-Priolo Map and its findings.

58. There are serious seismic issues that must be evaluated as part of the review process. The City's proposed approach to this life-and-death issue violates CEQA.

59. As explained in *POET, LLC v. State Air Resources Bd.* [2013] 218 Cal.App.4th 681, 734-735: "A state agency considering proposed action under a certified regulatory program must not approve or adopt the activity "if there are feasible alternatives or feasible mitigation measures available that would substantially lessen a significant adverse effect that the activity may have on the environment." (21080.5(d)(2)(A).) As to the written documentation prepared under a certified regulatory program, it must include a description of "mitigation measures to minimize any significant adverse effect on the environment of the activity." (§21080.5(d)(3)(A).) This obligation to describe mitigation measures is one of the procedural requirements of CEQA "intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." (§21002.)" Here, the DEIR admits there are serious seismic issues in the Project Area, while

ignoring the strongest evidence about the extent of these issues. It then reaches the legally unsupportable conclusion that the Plan Update will have no impact and that no mitigation is required because "up-to-date seismic design standards reduce structural failure during a fault rupture." (4.6-16) This takes the DEIR beyond mere hubris into the reale of the fantastic. This bald conclusion is not supported by any evidence and cannot be reconciled with the either the authorities the DEIR pays lip service to and the recent studies which it wholly ignores. The same weak assertions masquerading as reasoned analysis appear in the DEIR at 4.6-17). Each extends a simple premise (modern construction techniques can reduce the effects of seismic impacts) to the unsupported conclusion that massive fault rupture will have no impacts in the new high-rise buildings packed into the Regional Center CPIO Subarea of the Plan Update. This is facially absurd. By analogy, the fact that "up-to-date" design standards can reduce the time it takes for brakes to slow a car down more quickly does not make it safe to drive that car on the 101 Freeway in rush hour traffic at 120 miles per hour. The conclusion bears no logical relationship to the premise.

60. The general rule is that mitigation measures may not be deferred, Guideline 15126.4(b)(1)(A) has consistently mandated: "Formulation of mitigation measures shall not be deferred until some future time." This principle has been consistently applied and emphasized by courts as the "general rule against deferral."

61. The DEIR ignores the authoritative studies showing active faults under the project site, As such, a "no harm, no foul" defense does not exist when, as here, relevant information is withheld from the public and public agencies in the EIR.

62. For this reason, any reliance on *Oakland Heritage Alliance v City of Oakland* (2011) 195 Cal.App.4th 884, 895, 904 and *Cadiz Land Co., Inc.* 83 Cal.App.4th at 98-101 for the proposition that fault investigation studies may properly occur in the future is unavailing. Neither case involved the issue here, i.e., whether the draft EIR failed to include relevant earthquake fault information necessary to fully inform the public.

63. The courts "scrupulously enforce" compliance with the statutory procedural requirements of CEQA. (*Citizens of Goleta Valley v. Board of Supervisors* [1990] 52 Cal.3d 553, 564. Only when CEQA is scrupulously followed does the public "know the basis on which its responsible officials either approve or reject environmentally significant action, and the public, being duly informed, can respond accordingly to action with which it disagrees. [Citations.] The EIR process protects not

only the environment but also informed self-government." (*Laurel Heights Improvement Assn. v. Regents of University of California* [1988] 47 Cal.3d 376, 392).

64. When the California Geological Survey and the U.S. Geological Survey studies came out after the Draft EIR dated November 2018, the City was required to have recirculated a new DEIR to include the critical new information from USGS and CGS. (See CEQA Guidelines, §15200 [the purpose of allowing the public and other governmental agencies the opportunity to review EIRs includes: sharing expertise, disclosing agency analyses, checking for accuracy, detecting omissions, discovering public concerns, and soliciting counter proposals). Each of those objects is impaired by the City's exclusion from the Draft EIR of known, relevant Hollywood Earthquake Fault information that directly pertains to the Regional Center CPIO Subarea of the Plan Update. The absence of this key information regarding the seismic hazards and active earthquake faults running through the Regional Center CPIO Subarea of the Plan Update "frustrated the purpose of the public comment provisions" of CEQA during the critical draft EIR stage, and impaired informed decision making. (*Sierra Club, supra,* 7 Cal.4th at 1236-1237.) Under such circumstances, "prejudice is presumed" (*Id.* at 1237.)

65. Obtaining information through studies is a key part of formulating mitigation measures. The lead agency "must" find out and disclose all that it reasonably can during the CEQA (and especially during the draft EIR) process. (see i.e. City of Los Angeles CEQA Thresholds Guide for Geologic Hazards and discussion, supra). This information is to then be used in part to formulate mitigation measures. (*POET*, 218 Cal.App.4th at 759, [ARD violated CEQA when it "deferred the formulation of mitigation measures for NOx emissions from biodiesel without committing to specific performance criteria for judging the efficacy of the future mitigation measures"])

66. Under Guidelines §15126.4(a)(1)(B), the specific details of a mitigation measure may be developed after project approval only "when it is impractical or infeasible to include those details during the project's environmental review," and the agency "adopts specific performance standards the mitigation will achieve" (Save Agoura Cornell Knoll, 46 Cal.App.5th at 668).

67. None of these requirements are met here.

68. If "active fault traces" are found (or not ruled out) in the Project Area, modifications will need to be made to the Plan Update. As such, the

required project description does not meet the requirement that it be "stable and finite." *(stopthemillenniumhollywood.com, supra*. 39 Cal.App.5th at 16).

69. Mitigation measures should describe the actions that will be taken to reduce or avoid an impact. The DEIR does not meet this requirement and relies on a combination of omissions and the legally flawed conclusion that seismic issues are not within the purview of CEQA as ground for stating that no mitigation is required. The DEIR also suggests that the enforcement of other laws somehow obviates the need for mitigation measures. It states that "beyond the CEQA process, there is a comprehensive regulatory framework implemented at the state and city levels to mitigate potential hazards associated with geologic and soils conditions." (4.6-14). The assertion that compliance with these other laws may "mitigate potential hazards associated with geologic and soils conditions" does not support that statements that there will be no project impacts and that no mitigation measures are required. Rather, it only further underscores the flaws in the DEIR.

70. There is another issue that is fatal to the approval, While wrongly claiming that no mitigation measures are required, the DEIR also says that the enforcement of various codes may mitigate the impact of seismic events. But CEQA Guidelines, §15126.4(a)(1)(B) also requires that the mitigation measure "adopt[ ] specific performance standards the mitigation will achieve." Impermissible deferral can occur when an EIR calls for mitigation measures to be created based on future studies or describes mitigation measures in general terms but the agency fails to commit itself to specific performance standards. (*Cleveland Nat'l Forest Found.*, 17 Cal.App.5th at 442 [generalized air quality measures failed to set performance standards]; *California Clean Energy Comm. v City of Woodland* [2014] 225 Cal.App.4th 173, 195 [agency could not rely on future report on urban decay with no standards for determining whether mitigation required); *POET*, 218 Cal.App.4th at 740 [agency could not rely on future rulemaking to establish specifications to ensure emissions of nitrogen oxide would not increase because it did not establish objective performance criteria for measuring whether that goal would be achieved); *Gray v County of Madera* [2008] 167 Cal.App.4th 1099, 1119 [rejecting mitigation measure requiring replacement water to be provided to neighboring landowners because of mine operations and holding that the commitment "to a specific mitigation goal" is not adequate where "the County has not committed itself to a specific performance standard."])

71. Additional testing may be required under CEQA "if the initial testing is insufficient." (*Save Agoura*, 46 Cal.App.5th at 693-694; *Gray v. County of Madera* [2008] 167 Cal.App.4th 1099, 1115.)

72. But studies conducted after approval do not guarantee an adequate inquiry into environmental effects. Such a mitigation measure would effectively be exempt from public and governmental scrutiny. Specifically, a condition that requires implementation of mitigation measures to be recommended in a future study may conflict with the requirement that project plans incorporate mitigation measures. (Pub Res C §21081.6(b); 14 Cal Code Regs §15126.4(a)(2); *Federation of Hillside & Canyon Ass'ns v City of Los Angeles* [2000] 83 Cal.App.4th 1252, 1261).

73. A mitigation measure calling for a mitigation plan to be devised on the basis of further study can also be found legally inadequate if it does not identify steps that might be taken to mitigate the impact once the study is completed. (*Preserve Wild Santee v City of Santee* [2012] 210 Cal.App.4th 260, 280 [mitigation measure providing for active habitat management did not describe anticipated management actions and did not include management guidelines or performance criteria]; *Communities for a Better Env't v City of Richmond,* 184 Cal.App.4th at 95 [rejecting mitigation measure that required project applicant to develop plan for reducing greenhouse gas emissions because it identified undefined and untested measures of unknown efficacy and did not contain any objective criteria for measuring success];[1] *San Joaquin Raptor Rescue Ctr.* 149 Cal.App.4th at 669 [rejecting mitigation measure calling for future surveys for special status species and development of undefined habitat management plan in response to surveys]; *Endangered Habitats League, Inc. v County of Orange* [2005] 131 Cal.App.4th 777, 794 [rejecting mitigation measure requiring

[1]In *Communities For A Better Environment, supra* 184 Cal.App 4th at 75 the city council certified the EIR. Late in the environmental review process —that is, in an addendum circulated after issuance of the final EIR—the city belatedly found that the project's greenhouse gas emissions would be a significant impact. (Id. at 90–91) The amended EIR addressed this impact by putting forth "some proposed mitigation measures to ensure that the Project's operation 'shall result in no net increase in GHG emissions over the Proposed Project baseline.'" (Id. at 91) The amended EIR gave Chevron one year to submit to the city, for approval by the city council, "'a plan for achieving complete reduction of GHG emissions up to the maximum estimated… Project GHG emissions increase over the baseline'" (Ibid.) The Court concluded the mitigation plan for greenhouse gases violated CEQA because the city "delayed making a significance finding until late in the CEQA process, divulged little or no information about how it quantified the Project's greenhouse gas emissions, offered no assurance that the plan for how the Project's greenhouse gas emissions would be mitigated to a net-zero standard was both feasible and efficacious, and created no objective criteria for measuring success." (CBE, at p. 95).

submission of acoustical analysis and approval of mitigation measures recommended by analysis because no mitigation criteria or potential mitigation measures were identified]). In short, mitigation deferral as has occurred here is not appropriate, especially since the result expected from the agency permitting process is left undefined. (*San Joaquin Raptor Rescue Ctr.,* 149 Cal.App.4th at 669.)

74. To comply with CEQA, the City should take into account the authoritative studies and other materials from 2020 discussed above, formulate mitigation measures to address what is learned and provide these express mitigation measures in a recirculated EIR that actually complies with CEQA. The City has not shown with substantial evidence how regulations that the City assumes mitigate impacts will fully mitigate the impacts that will be reflected in the 2020 material and in these future studies. Imposing project conditions but failing to include them in a mitigation monitoring plan is an evasion of the requirement to recirculate, with new mitigation initially (and improperly) omitted.

75. Nor does the approval language "adopt[ ] specific performance standards the mitigation will achieve" as required by CEQA Guidelines, §15126.4(a)(1)(B). That specific performance criteria must be "articulated at the time of project approval," and further action to carry the project forward must be contingent on meeting them (*Sacramento Old City Ass'n,* 229 Cal.App.3d at 1029; *Rialto Citizens for Responsible Growth v City of Rialto* [2012] 208 Cal.App.4th 899, 945 [the general rule against deferred mitigation bars "loose or open-ended performance criteria"]).

76. Here, the proposed Plan Update alludes to significant seismic issues, omits the most important data regarding those issues, misstates the law and then states that no mitigation measures are required.

77. As such, the document contains no full commitment to mitigating identified significant seismic impacts of the Regional Center CPIO Subarea of the Plan Update. For example, the approvals do not state that the project will need to be designed so that the seismic effects of ground shaking, liquefaction, and settlement will be mitigated to a less than significant level. The required performance standards are not found anywhere in the document. "Impermissible deferral of mitigation measures occurs when an EIR puts off analysis or orders a report without either setting standards or demonstrating how the impact can be mitigated in the manner described in the EIR." (*City of Long Beach v. Los Angeles Unified Sch. Dist.* [2009] 176 Cal.App.4th 889, 915.) That language both describes and dispenses with the bill of goods that MCAF is peddling here.

78. Based on the lack of the required performance standards, it is fair to conclude they cannot be specified until the extent of the problem is determined by further testing. This, too, is inadequate under CEQA. (*Sierra Club v County of San Diego* [2014] 231 Cal.App.4th 1152 [Later actions taken to flesh out a mitigation measure that calls for the details to be deferred must be consistent with the measure's terms, comply with its requirements, and be designed to implement its performance standards.]). Here, the public and the agencies are left to guess about the effect the proposed project will have.

79. Perhaps this is because there is no way to safely build or modify implement the Plan Update in the Regional Center CPIO Subarea if the further study confirms the findings in this record that there in fact are active earthquake faults in the Project Area. (*Carmel Valley View, Ltd. v. Board of Supervisors* [1976] 58 Cal.App.3d 817, 821-822 [The presence of geological hazards ascertained in connection with the required EIR requires map disapproval on grounds of physical unsuitability], see Govt. Code §66474(d) [if a site is not physically suitable for the proposed density of development, a public agency cannot approve a map for the proposed subdivision].) In fact, the DEIR implicitly reaches the same conclusion by requiring further studies **later** concerning the active earthquake faults. But unless and until some studies are completed, it cannot be known if mitigation that can meet a specified performance standard is even available.

80. Many cases stress the importance of careful seismic studies as part of the approval process. Properly utilized, their function is "to eliminate a potential source of seismic hazard." (*Beverly Hills Unified Sch. Dist. v Los Angeles County Metro. Transp. Auth*. (2015) 241 Cal.App.4th 627, 663 ["The elimination of the Santa Monica station as an option did nothing to change the potential environmental impacts of the Project, other than to eliminate a potential source of seismic hazard."]; see also *Oakland Heritage,* 195 Cal.App.4th 884 [design of structure in conformance with seismic design codes coupled with review by engineers and building officials was sufficient to ensure mitigation of seismic impacts];[2] *California Oak Foundation v. Regents of University*

[2]The *Oakland Heritage* court describes "the situation here—and contrary to the rule of CNPS and SOCA—not only had the study not been made, but no possible mitigation measures had been developed, no performance standards had been set, and there was no reason to conclude either that the measures recommended in the study would be feasible or that they would mitigate the impacts." (195 Cal.App.4th at 911)

of California (2010) 188 Cal.App.4th 227, 264 ["[m]ost significantly, both the DEIR and EIR identified as a "significant and unavoidable" impact the fact that people or structures at the project sites could be exposed to potentially substantial adverse effects, including the risk of loss, injury, or death from rupture of a known earthquake fault or strong seismic ground shaking]. See also Id. at 251 [proposed Athlete Center was not an "addition" or "alteration" within the meaning of the Alquist-Priolo Act and thus not subject to the Act's value restrictions and in any event, a report issued after the DEIR, but before the EIR "entitled Fault Rupture Hazard Investigation... concluded that the proposed Athlete Center site was not located astride an active fault." [Id. at 263]; see also Id. at 264 [noting that the "DEIR also assured the public that neither project would be built across the trace of a known active fault").[3]

81. Vedanta does not suggest that there can never be a situation where a deferred seismic study might be proper. But here, none of the requirements articulated in CEQA Guideline, §15126.4(a)(1)(B) and the relevant cases has been met.

82. "Under CEQA, a public agency cannot charge a developer with the responsibility to study the impact of a proposed project. (*Sundstrom v. County of Mendocino* [1988] 202 Cal.App.3d 296) Sundstrom involved a county delegating the duty to conduct hydrology impact studies for construction of a sewage treatment plant to the applicant. (Id. at p. 307) The Court held CEQA did not allow delegation of "the County's legal responsibility to assess environmental impact by directing the applicant himself to conduct the hydrological studies subject to the approval of the planning commission staff." (*California Clean Energy Committee v. City of Woodland* [2014] 225 Cal.App.4th 173, 194).

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[3]The totality of excluded information violating CEQA's information disclosure obligations also makes this case distinguishable from *California Oak Foundation*, where the only information excluded from the EIR was a single report. *See, analogously*, the Supreme Court's analysis in *Save Tara v. City of West Hollywood* (2008) 45 Cal.4th 116, that examined the totality of "circumstances and the practical effect of the public agency's action on its ability and willingness to modify or reject a proposed project." *Id.* at 139. Likewise, ignoring the totality of the informational failure of the Draft EIR regarding seismic issues defeats CEQA's purpose to provide decision makers with full knowledge of potential impacts. "CEQA is essentially an environmental full disclosure statute, and the EIR is the method by which this disclosure is made." *Rural Landowners Assn. v. City Council* (1983) 143 Cal.App.3d 1013, 1020. The DEIR does not fulfill this mandate.

83. *Golden Door Properties, LLC v. County of San Diego* [2020] 50 Cal.App.5th 467, 520 invalidated an approval predicated on a future study because it "provide[d]" only a generalized goal....and then allow[ed] the Director to determine whether any particular...program is acceptable based on unidentified and subjective criteria." The Court stated the rule in clear terms: "Deferred mitigation violates CEQA if it lacks performance standards to ensure the mitigation goal will be achieved." As the Golden Door court observed, "there is nothing inherently unlawful under CEQA by delegating M-GHG-1 determinations to the Director. The problem is that M-GHG-1 contains no objective criteria for exercising that discretion to ensure that the...goals are actually met." (Id. at 523). "Feasible means "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." (Guidelines, § 15364.) M-GHG-1 contains no objective criteria for the Director to apply in making these factual determinations." These observations apply with equal force to the approval here.

84. The fact "that scientific knowledge in th[e] area" or seismology "is constantly evolving" "is one of the most important reasons 'that mitigation measures timely be set forth, that environmental information be complete and relevant, and that environmental decisions be made in an accountable arena.'" (*Communities for a Better Environment*, *supra*, 184 Cal.App.4th at 96.) Although "'foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can.'" (Ibid.) (Id. at 524)

85. The failure to include relevant information precludes informed decisionmaking and informed public participation, thereby thwarting the statutory goals of the EIR process. [Citation.] (*Al Larson Boat Shop, Inc. v. Board of Harbor Commissioners* [1993] 18 Cal.App.4th 729, 748)" (*Planning & Conservation League v. Castaic Lake Water Agency* [2009] 180 Cal.App.4th 210, 242, *Santa Monica Baykeeper v. City of Malibu* [2011] 193 Cal.App.4th 1538, 1558.)

86. Here, the project approval itself confirms that none of the requirements of the Guidelines is met. The Plan Update itself admits that construction in specific projects cannot proceed depending on the results of later testing. From this, it necessarily follows that approval of Plan Update for a Regional Center CPIO Subarea that may not be buildable, if the law is followed.

in and of itself has precluded informed decision-making and informed public participation.

87. As such, the approval also fails for each of the following reasons: (i) there is an inaccurate environmental setting; (ii) it excludes relevant information; (iii) the new USGS/CGS letter requires recirculation of the DEIR, and, finally, (iv) the project fails to do an adequate alternatives analysis.

88. Vedanta repeats the comment it made in an October 5, 2020 letter to the City Planning Commission concerning seismic issues surrounding the Hollywood Center (Millenium) Project: Our local history teaches that short-cutting the investigative and evaluative process to serve alternative agendas will cost lives and tarnish the legacies of all involved. For example, William Mulholland was primarily responsible for building the infrastructure to provide a water supply that allowed Los Angeles to grow into the largest city in California. He designed and supervised the building of the Los Angeles Aqueduct, a 233 mile long system to move water from Owens Valley to the San Fernando Valley. But his career ended when the St. Francis Dam failed, resulting in the loss of at least 600 lives, including 108 children. The Los Angeles Coroner's Inquest concluded that responsibility for the disaster lay in an error in engineering judgment about the suitability of the area's geology as a stable foundation for the dam, and in errors in public policy, which encouraged hasty building to meet the growing city's demands for more infrastructure. The Coroner's Inquest concluded the disaster was primarily caused by the unsuitable soil conditions on which the eastern abutment of the dam was built, which included an old earthquake fault (the San Francisquito Fault) that had not been adequately studied when the project was built. The disaster occurred because the theoretical and experiential knowledge base available for the project was inadequate to build the dam, without substantial additional research, exploration and testing. Almost one-hundred years later, that is exactly what is being proposed again. However, this time, there is no doubt but that those charged with ensuring public safety know of the risk.

89. The Hollywood Plan Update is an important document to guide the continuing revitalization of our community for decades. It is critical for our community and for the welfare of its current and future inhabitants to get this right. We must take the time and expend the effort to thoughtfully and properly address all relevant information. Lives will depend on it when the inevitable major seismic event occurs. The flaws and omissions we have described must be addressed before the DEIR is considered for approval.

For the reasons stated above, the City Planning Commission respectfully should reject the Plan Update as it is presently proposed. The DEIR must be updated to reflect important current information relevant to the seismic issues and then recirculated.

Thank you.

Very Truly Yours,
ANTHONY KORNARENS, APC

Anthony Kornarens

cc: Vedanta Society Of Southern California

Exhibit A

California Geological Survey July 16, 2020 CGS letter

July 16, 2020

Mindy Nguyen
City of Los Angeles, Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

SUBJECT: Comments on the April 16, 2020 Draft Environmental Impact Report for proposed "Hollywood Center" project. State Clearinghouse Number SCH 2018051002.

Dear Ms. Nguyen:

The Department of Conservation's California Geological Survey (CGS) received the April 16, 2020 Notice of Completion and Availability of Draft Environmental Impact Report (DEIR) for the "Hollywood Center" development project, located near Yucca Street, Argyle Avenue, Ivar Avenue, and Vine Street, in the Hollywood Community Plan area of Los Angeles, CA 90028. This letter conveys comments from CGS regarding geologic and seismic conditions affecting the site, including new information not addressed in the DEIR.

Under state law, including the Alquist-Priolo Earthquake Fault Zoning Map Act[1], the Seismic Hazards Mapping Act[2], and Public Resources Code section 2201, CGS provides technical information regarding earthquake faults and other hazards to local governments. This includes publishing detailed earthquake fault maps and other hazard maps and continually reviewing new seismic-hazard data to inform local decision-making. CGS apprises local governments of new seismic information since those maps were published if it is aware that a local government is considering approval of action impacted by this new information.

Due to emerging scientific information near the project site, and the project's height, construction materials, and proximity to active faults and densely populated urban areas, on September 24, 2018, CGS submitted comments in response to the notice of preparation of the DEIR. Our comments on the notice of preparation provided information on the 2014 CGS Fault Evaluation Report 253[3] and the related Earthquake

[1] Pub. Resources Code §§ 2621-2630
[2] Pub. Resources Code §§ 2690-2699.6.
[3] https://gmw.conservation.ca.gov/shp/EZRIM/Reports/FER/253/

Zones of Required Investigation Map (Hollywood Quadrangle), dated November 6, 2014[4], (the 2014 Hollywood Fault Map); faulting and ground-shaking hazard information developed in 2015, after the 2014 Hollywood Fault Map; and older information that provided general geologic context such as rock formation and soil profiles not directly related to faulting.

After CGS commented on the NOP, and after the DEIR was published, the United States Geological Survey (USGS) on May 8, 2020, issued a new, peer-reviewed analysis of the Hollywood Fault zone in the immediate area of this proposal.[5] The 2020 USGS analysis analyzed multiple seismic datasets and models, all of which consistently infer near-surface fault traces of the Hollywood Fault in the same locations. Importantly, the combined data indicate that more than one near-surface fault trace of the Hollywood Fault crosses the proposed project site. Based on the project's proximity to these fault traces, as well as the proposed development's height, construction materials, and location in a densely populated area, CGS staff determined that this new information is important to convey through comment on this DEIR. CGS summarizes findings from these new studies below and assesses how the USGS study, and other studies conducted after the 2014 Hollywood Fault Map, affect the consideration of seismic risk of the proposed development.

1. **Fault traces depicted in CGS's 2014 Hollywood Fault Map do not appear in Appendix G-1's figures of the project site** where locations of their subsurface investigations are presented. Therefore, we attach a figure showing both the location of traces as shown on the 2014 Hollywood Fault Map and the areas of investigation reported in Appendix G-1 (**Figure 1**). (DEIR Appendix G-2 shows the location of the fault trace at a lower level of resolution.) We note below that Figure 1 reflects new information indicating the active fault, which was not cleared by either the 2014 trench or the other investigative techniques reflected in Appendix G-1.

2. **The 2020 USGS study, and other studies that post-date CGS's 2014 Hollywood Fault Map, strongly suggest an active strand of the fault crosses the project site.** CGS considered the 2020 USGS study in light of other studies conducted after the 2014 Hollywood Fault Map. These studies are listed at the end of this letter and, for your convenience, are also available on CGS' FTP server (**FTP Link**). These studies, conducted east of the project site, postdate the studies included as Appendix G-1 to the DEIR, and are therefore new information of importance to public safety. These studies strongly support the presence of an active southern fault strand entering the eastern Hollywood Center property in the vicinity of the alley at Argyle, south of the

[4] https://gmw.conservation.ca.gov/SHP/EZRIM/Maps/HOLLYWOOD_EZRIM.pdf

[5] Catchings, et al., 2020, 2018 U.S. Geological Survey–California Geological Survey fault-imaging surveys across the Hollywood and Santa Monica Faults, Los Angeles County, California: U.S. Geological Survey Open-File Report 2020–1049, 42 p., https://doi.org/10.3133/ofr20201049

fault trench excavated in 2014 as described in Appendix G. Based on these studies, CGS expects to revise the Hollywood Earthquake Fault Zone Map within the next two years by extending the southern strand of the Hollywood Fault further east from where it is currently mapped.

In light of the 2020 USGS study and others referred to above regarding the seismic fault near the proposed development, CGS has assessed whether geotechnical analysis performed as part of the DEIR effectively addresses risks identified within this new information. CGS finds the following limitations in geotechnical analysis of the site given this new information:

3. **The fault trench excavated in 2014 did not clear the entire site of active faults.** Based upon review of the information presented in Appendix G-1 of the DEIR, the GDC trench on the east property did not completely expose the base of the Holocene-age geologic section across the north-south extent of the site and therefore cannot be considered to exclude the presence of an active fault at or near where it is depicted in CGS's 2014 Hollywood Fault Map, or in the more recent studies mentioned above.

4. **Other fault investigation techniques used on the site are not definitive in clearing the site of active faults.** Based on review of the information presented in Appendix G-1 of the DEIR, the fault studies prepared for the proposed Hollywood Center Project, both east and west properties, primarily rely upon subsurface investigations conducted by Cone Penetration Testing (CPT) and small-diameter boreholes. While these types of investigations can provide beneficial information, they are subject to ambiguous interpretations, particularly regarding the activity of faulting because geologists cannot clearly see which stratigraphic horizons are cut by a fault. A third-party review of the geologic studies conducted for the Hollywood Center Project (see Earth Consultants International, Project No. 3425, June 3, 2015; FTP Link), which was not included in Appendix G-1 of the DEIR, acknowledges the limitations of the project CPT and borehole subsurface investigations, including unresolvable errors in the re-survey efforts of these data locations. The third-party review also presents multiple possible interpretations of the locations and activity of the faults under the site (ECI, 2015, Plate 4), including an interpretation showing the distinct possibility that the southern strand of the Hollywood Fault is active beneath the project site (ECI, 2015, Plate 4, Interpretation A). CGS understands the project proponents report the project site is underlain by older stratigraphy, capped by Holocene age deposits (<11,700 years old). In their interpretation of boreholes and CPT's, they have postulated the faulting they have identified does not extend into the Holocene units. CGS' interpretation of the CPT and borehole data finds the fault can be drawn to extend into the Holocene units, such as Scenario A in the ECI report. These differing interpretations of fault activity along the southern strand are because only

indirect data from the CPT's and boreholes are available. CGS recognizes these uncertainties can only be resolved by fault trenching, which allows direct observations of subsurface geologic relationships and the ability to sample geologic materials for chronologic dating (see Section 5.4 of CGS Special Publication 42; https://www.conservation.ca.gov/cgs/Documents/SP_042.pdf)

5. **Fault investigations are incompatible with construction excavation.** Appendix G-1 of the DEIR indicates that conditional approval of the geologic report was granted in July 2015. The main condition stipulated by the conditional approval is that the project engineering geologist observe basement excavations during site construction and inform the City's Grading Division if evidence of active faulting is observed. As noted in CGS Special Publication 42 (see pages 32-33), fault trench investigations require detailed, time-intensive analyses of vertical sections of geologic materials. If fault investigations are not completed prior to final project design and approval, these practices may be compromised by typically efficient construction practices.

In conclusion, further assessment of the southern strand of the Hollywood Fault, following, for example, best practices outlined in CGS Special Publication 42 as discussed above, is important to adequately understand seismic risks of the proposed development in light of recently available information.

Please let us know if you have any questions regarding these comments. CGS is available for consultation with the City on evaluating fault activity and other seismic hazard issues.

Sincerely,

Janis L. Hernandez
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Attachments:

Figures 1 and 2

CGS Comments on the scope and content on the NOP for the Environmental Impact Report for the "Hollywood Center" project, September 24, 2018.

References cited (FTP Link):

- Catchings, R.D., Hernandez, J., Goldman, M.R., Chan, J.H., Sickler, R.R., Olson, B., and Criley, C.J., 2020, 2018 U.S. Geological Survey–California Geological Survey fault-imaging surveys across the Hollywood and Santa Monica Faults, Los Angeles County, California: U.S. Geological Survey Open-File Report 2020–1049, 42 p., https://doi.org/10.3133/ofr20201049.
- City of Los Angeles Department of Building and Safety, Grading Division, 2015, Geology Report Correction Letter, Log # 88174, Soils/Geology File – 2 AP, Tract 2058, lot 26, 6044 Carlos Avenue., reference report LA-1230, dated April 28, 2015 by Group Delta.
- Earth Consultants International, Response to Request from the City of Los Angeles Reviewer, East and West Millennium Sites, Project No. 3425, Dated June 3, 2015.
- Group Delta, 2015, Fault Activity Investigation, Proposed Apartment Development, 6044 Carlos Avenue, Hollywood Area, City of Los Angeles, CA, GDC Project No. LA-1230, dated April 28, 2015.
- Ninyo & Moore Geotechnical and Environmental Sciences Consultants, 2015, Fault Rupture Hazard Evaluation, Hollywood Courthouse, 5925 Hollywood Boulevard, Los Angeles, CA, Project No. 402132006, draft report dated February 24, 2015.
- Ninyo & Moore Geotechnical and Environmental Sciences Consultants, 2015, Supplemental Fault Rupture Hazard Evaluation, Hollywood Courthouse, 5925 Hollywood Boulevard, Los Angeles, CA, Project No. 402132007, draft report dated June 15, 2015.

Figure 1. Air photo image of the Hollywood area of Los Angeles with annotation by CGS. Red dashed lines are surface traces of active faults from the CGS Hollywood Fault Evaluation Report, 2014. Green dots represent locations where the Hollywood Fault has been located based on 2018 geophysical studies by the USGS. Orange rectangle inside the Hollywood Courthouse represents the location of the zone of faulting from a CPT and boring transect from Ninyo & Moore reports. Orange rectangle inside the Apartment project represents a zone of faulting from both CPT and core boring study by Group Delta. Blue line represents the steeply inclined Hollywood fault where it was encountered in Group Delta CPT and borings at depth.

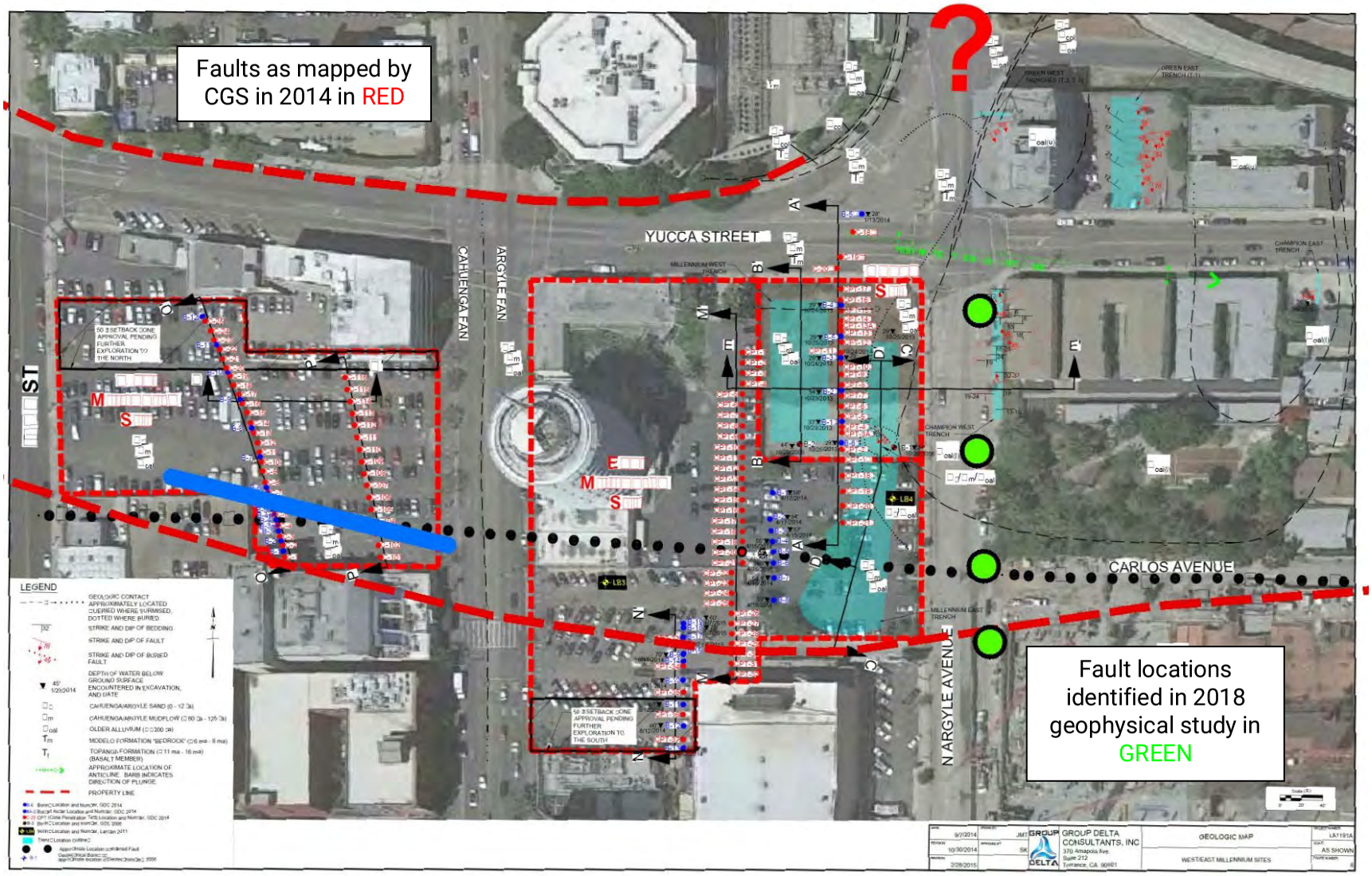

Figure 2. Google Earth image of the project location. Figure from Group Delta Fault Study Reports, as included in DEIR package with annotations by CGS. Turquoise shapes identify outline of approximate trench excavations at the ground surface. Trenches were excavated in vertical benches from the ground surface to selected depth. Excavation did not expose pre-Holocene materials across the entire length of the trench due to depth of excavation and benching style. Red and blue dots show core boring and Cone Penetration Test (CPT) locations across the site. Black dotted line is Group Delta's inferred fault trace, located at depth. Red long dashed lines are surface locations of active fault traces from CGS FER 253. Green dots represent locations where the Hollywood Fault has been located based on recent geophysical studies by the USGS. Blue line represents the steeply inclined Hollywood fault where it was encountered in Group Delta borings at depth.

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Edmund G. Brown Jr., *Governor*
John G. Parrish, Ph.D., *State Geologist*

September 24, 2018

Elva Nuño-O'Donnell
City of Los Angeles
Department of City Planning
6262 Van Nuys Blvd., Room 351
Van Nuys, CA 91401

SUBJECT: Comments on the scope and content on the NOP for the Environmental Impact Report for the "Hollywood Center" project.

Dear Ms. Nuño-O'Donnell:

The California Geological Survey (CGS) has received the Notice of Preparation for the draft Environmental Impact Report (EIR) for the "Hollywood Center" development project in the vicinity of Vine Street, Yucca Street, Ivar Avenue, and Argyle Avenue in the Hollywood Community Plan Area of Los Angeles, CA, 90028. This letter conveys suggestions and recommendations from the California Geological Survey concerning geologic and soils issues related to the planning area.

The California Geological Survey recommends the EIR address the following items and issues within the planning area:

1) Regional and Site Specific Geology
The EIR should include a discussion of the geologic and structural history of the area and a description of the rock types in the region and across the project site. At a minimum, the following geologic maps should be reviewed:
Dibblee Jr., T.W., 1991, Geologic map of the Hollywood and Burbank (south ½) Quadrangles, Los Angeles County, California: Dibblee Geological Foundation, Map DF-30, 1:24,000 scale.

Campbell, R.H., Wills, C.J., Irvine, P.J., and Swanson, B.J., 2014, Preliminary geologic map of the Los Angeles 30' x 60' Quadrangle, California, Version 2.1. California Geological Survey, available at: http://www.conservation.ca.gov/cgs/Pages/Maps-Data/preliminary_geologic_maps.aspx

Yerkes, R.F., 1997, Preliminary geologic map of the Hollywood 7.5' quadrangle, southern California: U.S. Geological Survey, Open-File Report OF-97-255, scale 1:24,000.

2) Geologic Hazards
Numerous potential geologic hazards exist within the Hollywood Center Project planning area. Each of the hazards listed below should be addressed in the EIR.
a. Earthquake Fault Zones

CGS has completed seismic hazard zone mapping for the Hollywood 7.5-minute quadrangle and the Hollywood Center Project planning area is within a defined Alquist-Priolo Earthquake Fault Zone. Digital versions of this zone map (PDF and Shapefiles) and associated reports can be downloaded from the CGS Information Warehouse, here: http://maps.conservation.ca.gov/cgs/informationwarehouse/ or accessed as web interactive maps, here: https://spatialservices.conservation.ca.gov/arcgis/rest/services/CGS_Earthquake_Hazard_Zones.

These zones can also be viewed with a parcel base map on CGS's interactive Earthquake Hazards Zone Application, here: https://maps.conservation.ca.gov/cgs/EQZApp/app/

b. *Faulting Hazards* – Numerous earthquake faults are mapped within and nearby the Hollywood Center Project planning area. The Hollywood Fault, and its associated splays, are the closest faults to the project area and the entire project lies within an Alquist-Priolo Earthquake Fault Zone for this fault. In addition, at least one trace of the Hollywood Fault is believed to cross the southern part of the planning area, between Hollywood Blvd and Yucca Street, and is considered active. Because the Hollywood Center Project lies within the regulatory Earthquake Fault Zone, site-specific fault investigations are required before the City of Los Angeles can issue permits and, if an active fault trace is found, appropriate fault setbacks must be determined.

At a minimum, the EIR should identify where active traces of the Hollywood fault pass through the planning area and discuss any surface rupture hazards they pose to the project. The most recent understanding of the location of the Hollywood fault is shown on the CGS interactive Data Viewer, here: https://maps.conservation.ca.gov/cgs/#datalist. From the Layer List, select "Seismic Hazards Program: Alquist-Priolo Fault Traces." Please note that these fault traces have been prepared at a regional scale (1:24,000) for the purpose of delineating the hazard zones. They should not replace site-specific geologic fault studies.

We also recommend that the following CGS Fault Evaluation Report for the Hollywood Fault in the Hollywood 7.5-Minute Quadrangle be reviewed in the EIR: http://gmw.conservation.ca.gov/SHP/EZRIM/Reports/FER/253/FER_253_Report_20140214.pdf

c. *Ground Shaking Hazards* – The Hollywood Center Project planning area is located near many active faults capable of producing severe ground shaking during an earthquake. The EIR should include a discussion on nearby active faults and the likelihood of the planning area to experience strong ground shaking from an earthquake during the life of the project. The earthquake shaking potential for various regions in California can be viewed on the CGS interactive Data Viewer, here: https://maps.conservation.ca.gov/cgs/#datalist. From the Layer List, select "MS48: Earthquake Shaking Potential for

California (revised 2016)." This map can also be downloaded as PDF, here: ftp://ftp.conservation.ca.gov/pub/dmg/pubs/ms/048/MS_048_revised_2016.pdf

In addition, the USGS Earthquake Hazards Program provides many tools and resources, here: https://earthquake.usgs.gov/hazards/

Please let me know if you have any questions or concerns with the comments in this letter.

Sincerely,

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Exhibit B

U.S. Geological Survey (USGS) Open-File Report, May 8, 2020, entitled "2018 U.S. Geological Survey–California Geological Survey Fault- Imaging Surveys Across the Hollywood and Santa Monica Faults, Los Angeles County, California"

Prepared in cooperation with California Geological Survey

2018 U.S. Geological Survey–California Geological Survey Fault-Imaging Surveys Across the Hollywood and Santa Monica Faults, Los Angeles County, California

By Rufus D. Catchings, Janis Hernandez, Mark R. Goldman, Joanne H. Chan, Robert R. Sickler, Brian Olson, and Coyn J. Criley

Open-File Report 2020–1049

U.S. Department of the Interior
U.S. Geological Survey

U.S. Department of the Interior
DAVID BERNHARDT, Secretary

U.S. Geological Survey
James F. Reilly II, Director

U.S. Geological Survey, Reston, Virginia: 2020

Suggested citation:
Catchings, R.D., Hernandez, J., Goldman, M.R., Chan, J.H., Sickler, R.R., Olson, B., and Criley, C.J., 2020, 2018 U.S. Geological Survey–California Geological Survey fault-imaging surveys across the Hollywood and Santa Monica Faults, Los Angeles County, California: U.S. Geological Survey Open-File Report 2020–1049, 42 p., https://doi.org/10.3133/ofr20201049.

Associated data for this publication:
Goldman, M.R., Catchings, R.D., Chan, J.H., Sickler, R.R., Criley, C.C., Hernandez, J.L., and Olson, B., 2020, Data release for the 2018 U.S. Geological Survey–California Geological Survey fault-imaging surveys across the Hollywood and Santa Monica Faults, Los Angeles County, California: U.S. Geological Survey data release, https://doi.org/10.5066/P9ENA8D4.

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We thank the following USGS scientists: Kerri Gefeke, Dan Langermann, Belle Philibosian, and Ali Pickering; we also thank USGS volunteers Joseph Catchings, Shirley Imsand, Richard Philibosian, and Nathan Suits, for assistance in acquiring the data for this report. We thank Shane Detweiler, Mike Diggles, and Taryn Lindquist (all USGS) for editing and formatting and reviewing.

Contents

Figures

Conversion Factors

International System of Units to U.S. customary units

Multiply	By	To obtain
	Length	
centimeter (cm)	0.3937	inch (in.)
millimeter (mm)	0.03937	inch (in.)
meter (m)	3.281	foot (ft)
kilometer (km)	0.6214	mile (mi)
	Flow rate	
meter per second (m/s)	3.281	foot per second (ft/s)
	Mass	
kilogram (kg)	2.205	pound avoirdupois (lb)

Abbreviations

1-D	one dimensional
2-D	two dimensional
AGC	automatic gain control
AWD	accelerated weight drop
CGS	California Geological Survey
HGW1	Hollywood guided-wave survey 1
HGW2	Hollywood guided-wave survey 2
HGW3	Hollywood guided-wave survey 3
HRR1	Hollywood refraction-reflection survey 1
HRR2	Hollywood refraction-reflection survey 2
HW1	Hollywood seismic profile 1 (P-wave survey)
HW2	Hollywood seismic profile 2 (S-wave survey)
HW3	Hollywood seismic profile 3 (P-wave survey)
Hz	hertz
MASW	multichannel analysis of surface waves
MAS_LW	MASW for Love waves
MAS_RW	MASW for Rayleigh waves
PGV	peak ground velocity
V_P	P-wave or compressional-wave velocity
V_P/V_S ratio	ratio of P-wave velocity to S-wave velocity
V_S	S-wave or shear-wave velocity
USGS	U.S. Geological Survey
UTC	coordinated universal time

2018 U.S. Geological Survey–California Geological Survey Fault-Imaging Surveys Across the Hollywood and Santa Monica Faults, Los Angeles County, California

By Rufus D. Catchings,[1] Janis Hernandez,[2] Mark R. Goldman,[1] Joanne H. Chan,[1] Robert R. Sickler,[1] Brian Olson,[2] and Coyn J. Criley[1]

Abstract

We acquired multiple types of seismic data across the Hollywood Fault in Hollywood, Calif., and the Santa Monica Fault in Beverly Hills, Calif., in May and June 2018. On the basis of our data, we infer near-surface locations of various traces of these faults.

From two separate profiles across the Hollywood Fault, we evaluated multiple seismic datasets and models, including guided-wave data, tomographic V_P data, tomographic V_S data, V_P/V_S and Poisson's ratio models derived from tomographic V_P and V_S data, Rayleigh-wave–based V_S models, Love-wave–based V_S models, V_P/Vs and Poisson's ratio models (derived from combinations of tomographic-based V_P and surface-wave–based V_S models), P-wave reflection images, and S-wave reflection images. All of these data and models can be used to delineate near-surface faulting, and the data consistently infer near-surface fault traces of the Hollywood Fault in the same locations. Importantly, the combined data indicate more than one near-surface fault trace of the Hollywood Fault. Between North Bronson and North Gower Avenues, evidence exists for a near-surface trace of the Hollywood Fault slightly south of Carlos Avenue. Farther west, along Argyle Avenue, our data contain high levels of cultural noise, but we interpret near-surface faulting slightly south of the intersection of Carlos and Argyle Avenues and between Carlos Avenue and Yucca Street.

For the Santa Monica Fault in Beverly Hills, we acquired guided-wave data only along Lasky Drive between Moreno Drive and South Santa Monica Boulevard, owing to limited access permissions. However, we used two separate source locations to generate the guided-wave data (SP1 and SP2). The data from more distant source location (relative to the recording array, SP1) were noisy, but on the basis of those data, we infer near-surface faulting at several locations along Lasky Drive, with concentrated near-surface faulting slightly south of the intersection of Lasky Drive and Charleville Boulevard. Guided-wave data generated at the closer source location (relative to recording array, SP2) more clearly show evidence for distributed near-surface faulting at several locations along Lasky Drive, with concentrated faulting near the intersection of Lasky Drive and Charleville Boulevard.

Although the seismic surveys across both faults provide strong evidence for the locations of near-surface fault traces, the seismic data provide little or no information about the rupture history of the fault traces.

Introduction

In May and June 2018, the U.S. Geological Survey (USGS) and the California Geological Survey (CGS) jointly conducted a series of seismic investigations in Los Angeles County, Calif., that

[1]U.S. Geological Survey
[2]California Geological Survey

were aimed at locating near-surface traces of the Hollywood Fault in Hollywood, Calif., and the Santa Monica Fault in Beverly Hills, Calif. **(**fig. 1**)**. For the Hollywood Fault, we acquired four seismic surveys along two transects, from which we evaluated five types of seismic data, as well as multiple data combinations that can be used to evaluate near-surface faulting. We used active sources to generate body waves, surface waves, and guided waves, and from those data, we evaluated (1) P-wave velocities (V_P), S-wave velocities (V_S), and their ratios using tomography, (2) S-wave velocities (V_S) using multichannel analysis of surface waves (MASW) on Rayleigh and Love waves, (3) peak ground velocities (PGV) of guided waves, (4) reflection images, and (5) combinations of those data. For the Santa Monica Fault, we acquired two guided-wave seismic surveys along Laskey Drive, from which we evaluated PGV of guided waves. In this report, we present images, models, and interpretations for the acquired data.

Seismic Methodologies

Faulting produces physical effects in the shallow subsurface that can be observed using multiple seismic-imaging methods. Although various types of seismic data can be affected differently by near-surface faulting, those effects generally occur within the fault zone at the same locations. As a result, using multiple seismic datasets can provide greater confidence in the locations of near-surface faults.

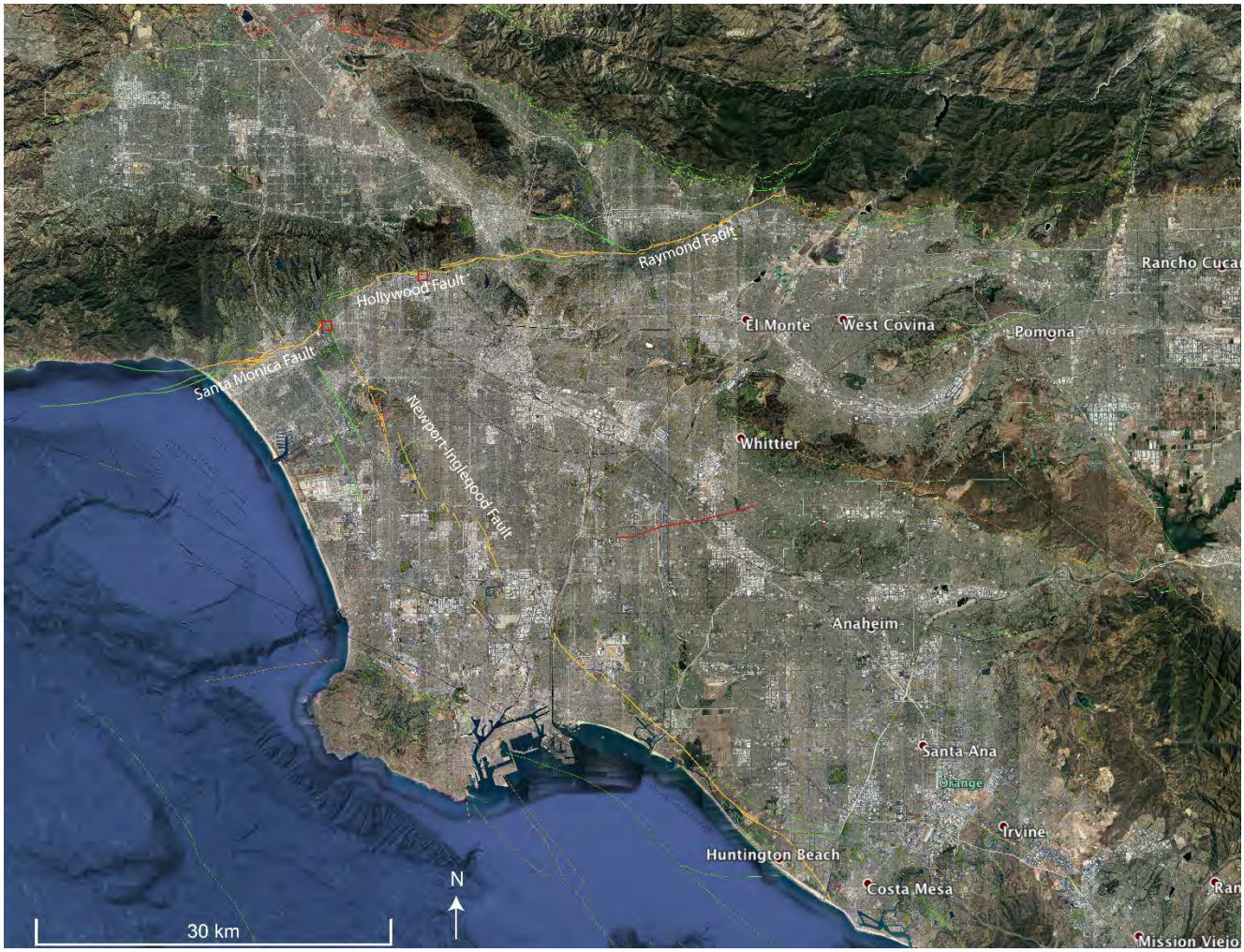

Figure 1. Mosaic of Google Earth images of the greater Los Angeles area, showing locations of the Hollywood Fault, Santa Monica Fault, and other faults. Small red rectangles indicate locations of Hollywood and Beverly Hills seismic profiles. Red lines show locations of historic faulting. Abbreviation: km, kilometer(s).

Here, we briefly describe some of these effects and how they relate to the seismic methods used in this investigation.

Shearing during the faulting process reduces the rigidity of faulted rocks and materials. As a result, both P- and S-wave velocities (V_P and V_S, respectively) decrease within fault zones relative to the surrounding rock mass. Empirical studies using laboratory data (Wang and others, 1978), active-source refraction data (Healy and Peake, 1975; Mooney and Luetgert, 1982; Mooney and Ginzburg, 1986; Jarchow and others, 1994; Catchings and others, 1998, 2002, 2008, 2009, 2014, 2016; Catchings, 1999), seismic-velocity logs (Boness and Zoback, 2004), earthquake-source data (Mayer-Rosa, 1973; Aki and Lee, 1976; Thurber, 1983; Eberhart-Phillips, 1990; Thurber and Atre, 1993; Thurber and others, 1995; Eberhart-Phillips and Michael, 1998), and guided-wave data (Leary and others, 1987; Li and Vidale, 1996; Li and others, 2000, 2007; Korneev and others, 2003; Li and others, 2014; Catchings and others, 2016) show a significant reduction (as much as 50%) in seismic velocities within fault zones.

These reductions in V_P and V_S that are due to faulting typically are seen in velocity models as near-vertical zones of low seismic velocities. However, in the shallow subsurface, low-velocity fault zones can be obscured in V_P models because of the presence of near-surface groundwater, which causes V_P in fault zones to increase, rather than decrease. In the shallow subsurface, V_S, which is strongly affected by the shear modulus, is typically more affected by faulting than V_P, which is strongly affected by the bulk modulus and the presence of groundwater. As a result, the ratios of V_P to V_S can be unusually high in fault zones, and such high ratios typically are highly diagnostic of near-surface faulting (Catchings and others, 2014).

Where present, stratigraphic layers can be vertically offset by near-surface faulting, particularly for reverse and normal faulting. Seismic-refraction tomography is a highly useful method for identifying such vertical offsets, particularly when different rock types are juxtaposed across faults. Seismic-reflection imaging is another particularly useful seismic method for identifying such vertical offsets when subhorizontally layered strata is present in the shallow subsurface. However, small vertical offsets may not be seen in the near-surface at the resolutions of many seismic-reflection surveys, particularly when faulting produces little vertical offset.

Guided waves (see below) can also be highly diagnostic of near-surface faulting when a fault trace can be identified in at least one location along its length. Collectively, these methods have been shown to be highly diagnostic of near-surface faulting.

Guided-Wave Methodology

With respect to seismic-wave propagation, low-velocity fault zones can be considered as wave guides that channel seismic energy. A number of studies have documented the wave-guide effect and the seismic energy that travels along and within the fault zones. This seismic energy is referred to as fault-zone-guided waves or fault-zone-trapped waves (Cormier and Spudich, 1984; Li and Leary, 1990; Li and others, 1990, 1997, 2000; Hough and others, 1994; Huang and others, 1995; Ben-Zion, 1998; Jahnke and others, 2002; Rovelli and others, 2002; Ben-Zion and others, 2003; Malin and others, 2006; Li and others, 2014). Fault-zone-guided waves travel exclusively within low-velocity fault zones, and once the seismic energy enters the fault zone, high-amplitude seismic energy results from coherent multiple reflections at the boundaries between low-velocity fault zones and higher velocity wall rocks (Cormier and Spudich, 1984; Leary and others, 1987; Li and Leary, 1990; Li and Vidale, 1996). Propagation of the seismic waves in fault zones is somewhat similar to optical-fiber light transmission. The amplitudes of fault-zone-guided waves are typically much larger, and the velocities are much lower, than body waves that travel outside of the fault zone (Cormier and Spudich, 1984; Spudich and Olson, 2001; Fohrmann and others, 2004; Ellsworth and Malin, 2011). Numerical studies have shown that high-amplitude guided waves are generated and propagate within fault zones only when the source is located within, or very close to, the fault zone (Li and Leary, 1990; Li and Vidale, 1996; Ben-Zion, 1998; Ingel

and others, 2002) or when the source underlies a fault zone that extends only to shallow depths (Fohrmann and others, 2004). Thus, for most crustal faults, guided waves propagate only along faults that are continuous between the seismic source and the observation point, as a discontinuous fault prevents lateral propagation of guided waves beyond the endpoint of the fault (Li and Vidale, 1996; Jahnke and others, 2002). Thus, the presence, continuity, and connectivity of faults can be inferred from the presence or absence of guided waves along faults (Catchings and others, 2016).

Guided waves have been identified in most studies on the basis of their relatively low-velocity, high-amplitude waveforms that have dispersive wavetrains, which are recorded on a series of seismographs deployed across or along a fault zone. The waveforms can be forward-modeled to estimate physical properties of the fault zone, including geometry, Q (attenuation), velocities, and temporal changes in velocity (Li and others, 2014, 2016). Furthermore, the locations of stations that record the high-amplitude waveforms and long time durations can be used to infer the overall maximum width of a fault zone, but this method is not ideal for locating individual fault traces within the overall fault zone.

In our study, we use peak amplitude (peak ground velocity [PGV]) of fault-zone-guided waves (Catchings and others, 2013, 2016) to more precisely locate individual fault traces within the overall fault zone. Because fault zones can be kilometers in width and can consist of multiple traces, evaluation of PGV is more effective in locating individual traces. For our present study, we identify guided waves as high-amplitude seismic waves that arrive later than the body waves (either V_P or V_S) and are narrowly confined to a set of stations. Guided waves can be measured on either vertical- or horizontal-component sensors (Malin and others, 1996), but in our present study, we use only data from horizontal-component sensors.

Tomography, MASW, and Reflection Methodologies

To develop seismic images, we also used seismic-refraction tomography, multichannel analysis of surface waves (MASW), and seismic-reflection processing techniques in this study. We developed P- and S-wave seismic-refraction tomography models using first-arrival travel times and the modeling code of Hole (1992). The nonlinear travel-time-tomography method by Hole (1992) uses a finite-difference algorithm to solve the eikonal equation in computing first-arrival travel times from the source to the receiver, and the model is updated in iterative steps using backprojection. Because P- and S-wave geophones and their respective shots were colocated approximately every 2 meters (m), we parameterized both our V_P and V_S models using 2-m horizontal (x) and vertical (z) intervals. For the tomographic inversions, we used 1-D starting models developed from shot-gather modeling that assumed similar but differing vertical variations in velocity. All starting models produced similar final velocity models, having velocities that generally differed by less than 5 percent at any given location in the final models. The geometrical setup of the seismic profile allowed us to use reciprocal shot and geophone (receiver) pairs to determine travel times. First arrivals were measured at nearly every geophone (~89) for each shot point (89) along the profile, totaling nearly 7,900 first arrivals for the P waves and for S waves. Although most first arrivals could be measured on most shot gathers, for some less energetic shots, we used reciprocal travel times from the more energetic shots to ensure travel-time consistency.

We developed Rayleigh- and Love-wave V_S models using a version of the MASW method (Park and others, 1999) that was developed by Hayashi and Suzuki (2004) and Hayashi (2008) and is available in the Geometrics 2D SeisImager software package. For MASW analysis, the SeisImager algorithm constructs common midpoint correlations to develop 1-D dispersion curves and 1-D V_S models for each shot point along the seismic profiles, and, by laterally combining those V_S models, a 2-D V_S model can be developed for each seismic profile. Although the MASW method can be applied to Rayleigh- and Love-wave (surface wave) data, the MASW method was originally applied to Rayleigh waves (Xia and others, 1999) and is generally referred to as the MASW method in the scientific literature. However, the

method is sometimes referred to as the MAS_RW method (Yong and other, 2013). The MASW method also has been applied to Love waves and has been referred to as the MALW method (Yuan, 2011; Xia and others, 2012; Catchings and others, 2017) or the MAS_LW method (Yong and others, 2013). In this report, we use the MAS_RW and MAS_LW descriptors to differentiate between the MASW method when applied to Rayleigh and Love waves, respectively.

In seismic-reflection data processing, we followed procedures similar to those outlined by Brouwer and Helbig (1998). Processing steps included geometry installation, independent trace editing, timing corrections, automatic gain control (AGC), band-pass filtering, surgical muting of refractions, surface waves and airwaves, velocity analysis (tomographic and 1-D velocities), elevation static corrections and normal moveout correction (using refraction-tomography velocities), stretch muting, common-depth point stacking, and poststack AGC and band-pass filtering. We attempted to stack both the P- and S-wave reflection data to look for variations in the resolution of the images.

Hollywood Fault Data Acquisition and Profiles

We acquired seismic data along profiles in Hollywood between May 23, 2018, and June 1, 2018. Data were acquired in several stages, with the data being recorded along the following two transects: (1) Profile HW1, which consisted of a 178-m-long, north-south-trending, linear profile (within a parking lot) located north of Hollywood Boulevard and about 80 m east of North Gower Street **(**fig. 2**)**, and (2) Profile HW2, a 370-m-long, north-south-trending, linear profile along North Argyle Avenue, between Hollywood Boulevard and Franklin Avenue (fig. 3).

Hollywood Fault Profile HW1

Profile HW1 originated on the north side of Hollywood Boulevard and ended in the courtyard of the First Presbyterian Church of Hollywood. We conducted several types of seismic investigations along Profile HW1. The first seismic investigation was a guided-wave survey (HGW1), whereby the recording array was perpendicularly offset from the seismic source, which was generated by a 227-kilogram (kg) (500-pound [lb]) accelerated weight drop (AWD). We used 157 individual “shots” at the same physical location (SP1), and the individual “shots” were stacked to form a single shot gather containing fault-zone-guided waves. Generally, the seismic source must be within or near a fault trace to generate guided waves, and so, accordingly, we placed SP1 within a known trace of the Hollywood Fault that had been previously investigated by core-boring and cone-penetration-testing (CPT) transects (Ninyo and Moore, 2015a, b).

The second seismic survey (HRR1) along Profile HW1 used active P-wave seismic sources (227-kg AWD shots and 3.6-kg hammer shots) that were in line with the recording array. Both seismic sources generated seismic energy when an AWD or hammer vertically struck a steel plate on the ground surface. The recording array consisted of 89 vertical-component sensors that were spaced 2 m apart. For the HRR1 seismic survey, we recorded P-wave refraction, P-wave reflection, and Rayleigh-wave data that were evaluated for evidence of faulting. In acquiring the P-wave data, we generated seismic shots at locations coincident with the 89 sensors. We used two stacked AWD shots at each of the southernmost 70 shot points, and four stacked hammer shots for each of the northernmost 19 shots, which were largely within the church courtyard.

The third seismic survey (HRR2) along Profile HW1 used active S-wave sources that were in line with the recording array. We generated the seismic sources by horizontally striking a 3.6-kg hammer against an aluminum block that was tethered to the ground surface. The recording array consisted of 89 horizontal-component sensors that were spaced 2 m apart. For the HRR2 survey, we recorded S-wave refraction, S-wave reflection, and Love-wave data that were evaluated for evidence of faulting. In acquiring the S-wave data, we generated seismic shots at 78 (of 89) shot-point locations that

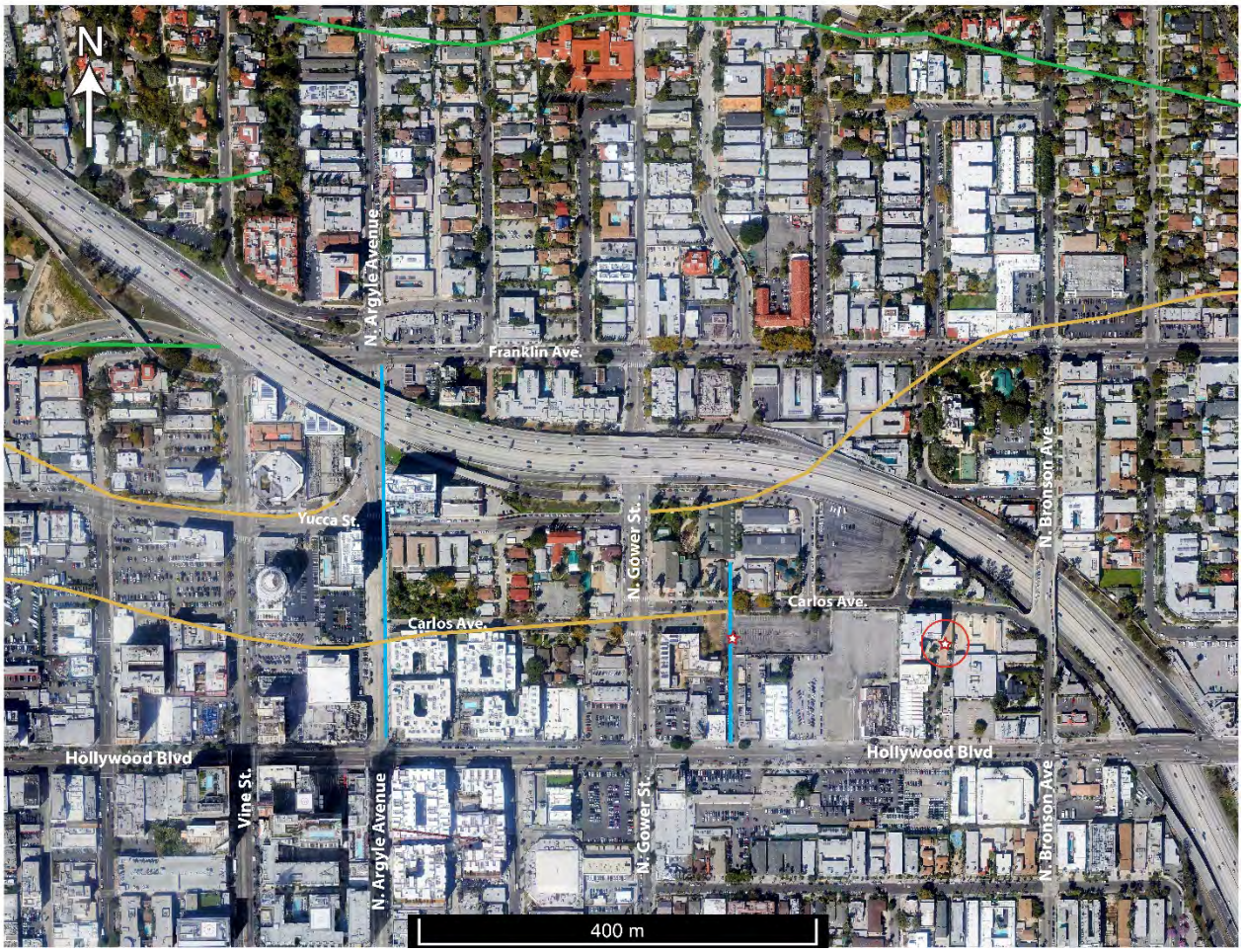

Figure 2. Google Earth image of study area along Hollywood Fault (yellow lines). Green lines show inferred location of faults of undetermined age. Blue lines show locations of seismic profiles: HW1 is shorter, eastern profile; HW2 is longer, western profile. Red stars show locations of shot points used to generate guided waves: SP2, star along profile HW1; SP1, circled star. Abbreviation: m, meter(s).

were coincident with horizontal-component sensors. Most of the unused shot-point locations were within the courtyard of the First Presbyterian Church of Hollywood, where the ground was covered with cement. To avoid damaging the cement, we chose not to have sources at sensor numbers 66, 69, and 81 to 89. We used four stacked hammer-block shots for each shot point.

We used three types of recording systems along Profile HW1. For in-line, P- and Rayleigh-wave seismic imaging, we used Mark Products 4.5-hertz (Hz), vertical-component sensors (geophones) that were attached to a refraction cable. For in-line, S- and Love-wave seismic imaging, we used Mark Products 4.5-Hz, horizontal-component sensors that were attached to the same refraction cable. For both types of sensors, the refraction cable was attached to two 60-channel Geometrics RX60 Strataview seismographs. For both the P- and S-wave surveys, we used a sampling rate of 0.5 milliseconds (ms), and data were recorded for 2 seconds (s). For guided-wave recording along Profile HW1, at each recording site, we used two stand-alone, Reftek RT-125 (Texan) seismographs that were attached to Sercel 4.5-Hz, 3-component L-28 sensors, and we used a sampling rate of 0.5 ms and a recording length of 3 s.

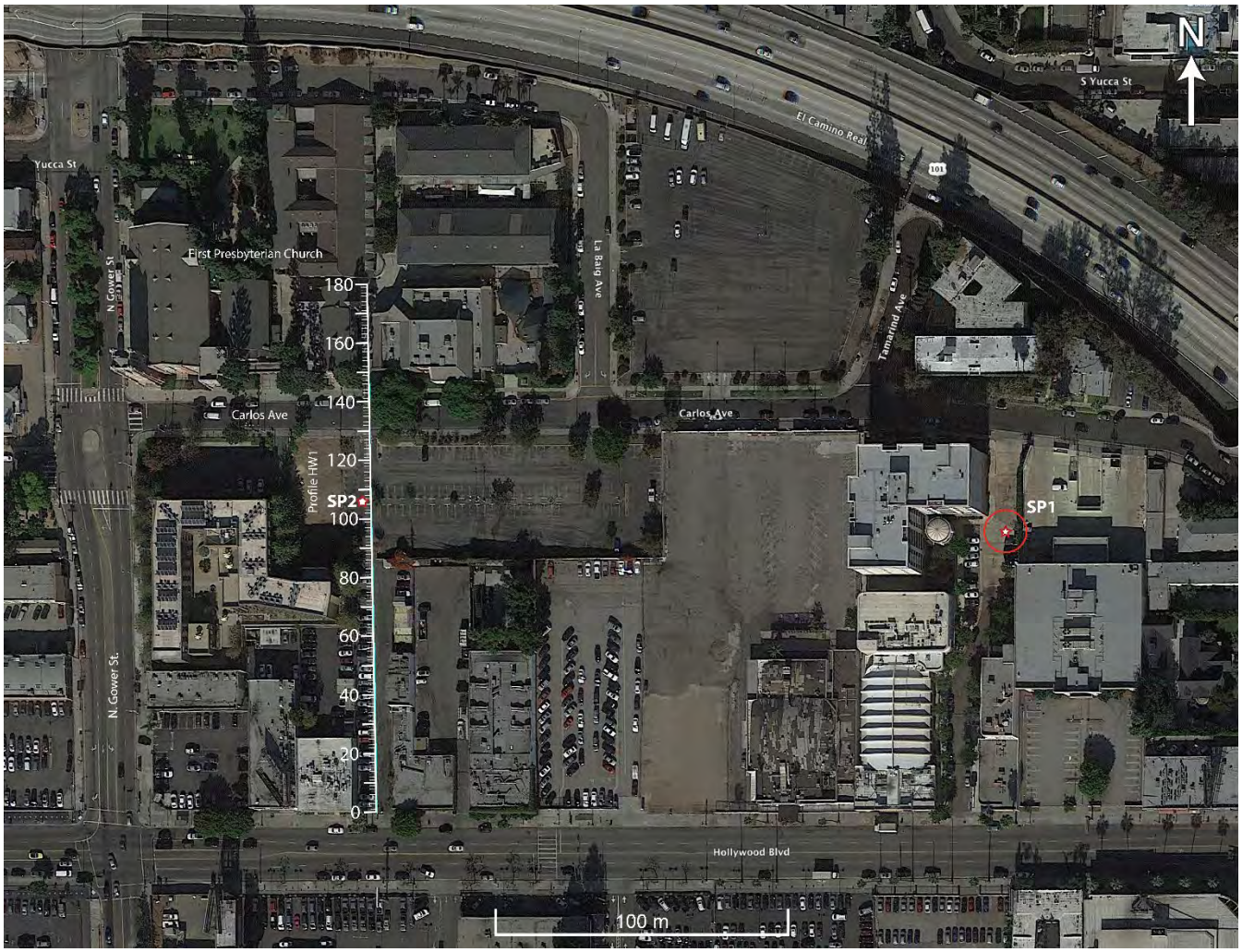

Figure 3. Google Earth image of Hollywood Fault study area near Profile HW1, showing distance scale (in meters [m]) along Profile HW1 and locations of shot points SP1 and SP2 (red stars). SP1 is located at the near-surface fault trace, as determined by a core-boring and cone-penetration-testing (CPT) transect; SP2 is located at the near-surface trace of Hollywood Fault, as indicated by peak ground velocity of guided waves.

Hollywood Fault Profile HW2

Profile HW2 extended along the east side of North Argyle Avenue from Hollywood Boulevard to Franklin Avenue, crossing Yucca Street and Highway 101 near the north end of the profile (fig. 4). As with Profile HW1, we conducted several types of seismic investigations along Profile HW2 or parts of it. The first seismic survey along Profile HW2 was a guided-wave survey (HWG2), from which guided-wave data were acquired. The second seismic survey was an in-line P-wave survey (HRR3), from which reflection, refraction, and MAS_RW (multichannel analysis of surface waves, Rayleigh waves) data were acquired. The third seismic survey was an S-wave survey (HRR4), from which we attempted to acquire reflection, refraction, and MAS_LW (multichannel analysis of surface waves, Love waves) data; however, we recorded only 13 S-wave shots for the HRR4 survey because our S-wave seismic sources were too weak to overcome the traffic noise along North Argyle Avenue. As a result, we did not process data for the third (HRR4) survey.

For the HRR3 in-line seismic survey, we deployed 66 channels, using 3-m spacing between each channel and having a total profile length of 195 m. The actively recording profile extended only from

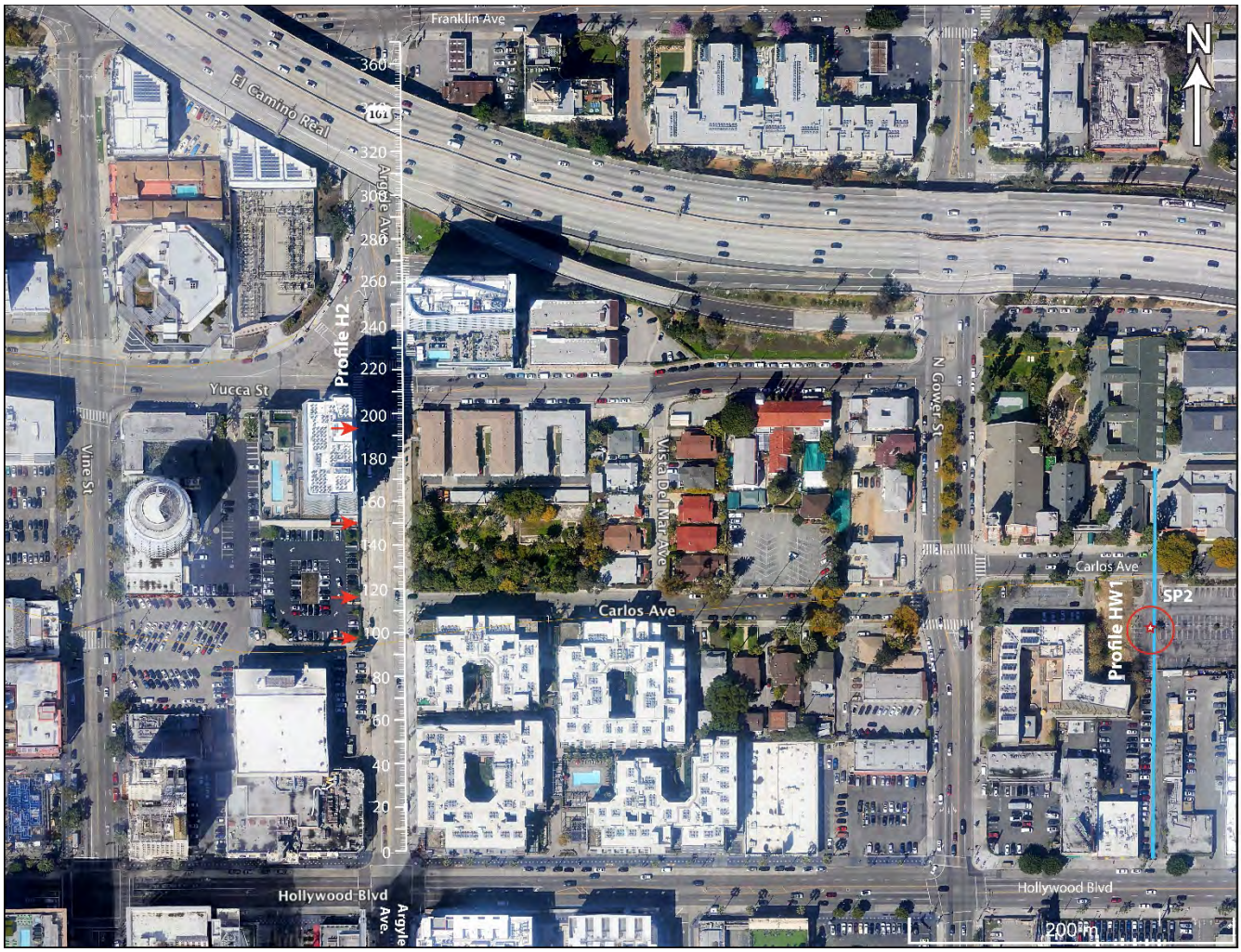

Figure 4. Google Earth image of Hollywood Fault study area near Profile HW2, showing distance scale (in meters [m]) along Profile HW2 (North Argyle Avenue) and location of SP2 (circled red star). Red arrows along North Argyle Avenue denote two zones of probable faulting, as indicated by seismic data. SP2 is located at the near-surface trace of Hollywood Fault, as indicated by peak ground velocity of guided waves.

Hollywood Boulevard to Yucca Street (fig. 4). We used a 227-kg AWD to generate P- and Rayleigh-wave seismic energy along the profile, and a shot point was colocated with every active channel except three of them that had obstructions that prevented the use of the AWD. The P- (and Rayleigh-) wave data were recorded using two Geometrics RX-60 seismographs that were attached to refraction cables and Sercel 4.5-Hz, single-component (vertical) sensors.

Guided-Waves Results for Profile HW1

The guided-wave seismic survey (HGW1) along Profile HW1 was conducted on the night of May 24, 2018. Although we deployed 89 sensors that were spaced at 2-m intervals, ten of the sensors experienced instrumental failure. The seismic source for the HGW1 survey was located about 215 m east of the recording array and approximately 100 m west of North Bronson Avenue, between Carlos Avenue to the north and Hollywood Boulevard to the south (fig. 3). To record guided waves with less cultural noise, we generated seismic sources (157 AWD shots) in the evening hours of May 24, 2018, beginning at about 18:06:11 (local time) and continuing until 18:57:40. The resulting data contained clear arrivals and strong guided-wave energy.

Guided-Wave Data Analysis for Profile HW1

Guided waves generated during the HGW1 survey were identifiable as high-amplitude arrivals following the shear-wave arrivals (figs. 5*A*, *B*). As a result, we evaluated PGV on the seismic traces only for the part of the seismic record at and following the S-wave first arrival. We correlated the PGV of the guided waves and the travel times to differentiate the guided waves from other possible strong arrivals (figs. 6*A*, *B*). The data show that the highest PGV values, which are expected at fault traces, arrived at the recording array at about 1,200 ms (1.2 s), and, because the source was approximately 215 m from the recording array, we determined that the guided waves traveled (on average) at about 180 m/s. The earliest shear waves arrived at the recording array at about 800 ms (0.8 s), suggesting an average V_S of about 270 m/s. Thus, the guided waves traveled at about 67 percent of the velocity of the shear waves, consistent with velocities expected of guided waves.

Because guided waves travel exclusively within fault zones as high-amplitude arrivals, the physical location of near-surface fault traces can be inferred from guided waves (fig. 6*A*), with the highest amplitudes occurring at the near-surface trace. Our analysis of the PGV of guided waves along Profile HW1 shows a prominent peak between channels 48 and 66 (meters 94–110) of the recording array, with the highest peak concentrated at channel 54 (meter 106) of Profile HW1. Although the highest PGV value occurs at channel 54, relatively high values also occur between channels 50 and 60 (meters 98–118), suggesting a wider fault zone at slightly greater depths. PGV values are appreciably lower to the north and south of the apparent fault zone (channels 48–66, meters 94–110), but an asymmetry is present in PGV values, whereby values to the south are higher than those to the north. We interpret this asymmetry to indicate either a near-surface southward dip of the fault zone or some additional deeper fault traces to the south of meter 106 of the seismic profile.

Our inferred fault location is also consistent with disruptions in lithology identified in previous borehole measurements (Group Delta, 2015). However, Group Delta (2015) interpreted this change in lithology as arising from a shallow-depth paleochannel at that location. We suggest, however, that a paleochannel cannot account for the presence of guided waves, the observed travel-time delay of the guided waves, or the discrete high PGV values at meter 106. As discussed below, a paleochannel also cannot account for other seismic anomalies observed at that location. Thus, we suggest that the lithology change and the high PGV values result from near-surface faulting near meter 106 of Profile HW1 .

In addition to the high PGV values at the apparent near-surface fault zone (meter 106), a zone of relatively higher PGV values is present between channels 1 and 18 (fig. 6*A*). Although this zone has high PGV values that would be expected of a deeper fault zone, the timing of the high PGV values (fig. 6*B*) suggests that they are not generated by guided waves. Instead, we suggest that this zone of high PGV values may be caused by seismic energy generated by the subway system (Metro Red Line), which is located beneath Hollywood Boulevard. With respect to guided waves, a subway system would be somewhat analogous to a fault zone, whereby high-amplitude seismic and sound waves that are generated within the subway bore by moving trains would be trapped and would propagate within the subway bore.

Tomography, MASW, and Reflection Results for Profile HW1

For the in-line active-source surveys along Profile HW1, we evaluated V_P, V_S, V_P/V_S ratios, and Poisson's ratios, using V_P derived from tomography and V_S derived from several methods. We also evaluated V_P and V_S reflection images.

Profile HW1 V_P Model

Along Profile HW1, our tomography model (fig. 7) shows that V_P ranges from about 300 m/s (at the surface) to 2,800 m/s (at ~50 m depth). In the shallow subsurface, a change in the depth of the

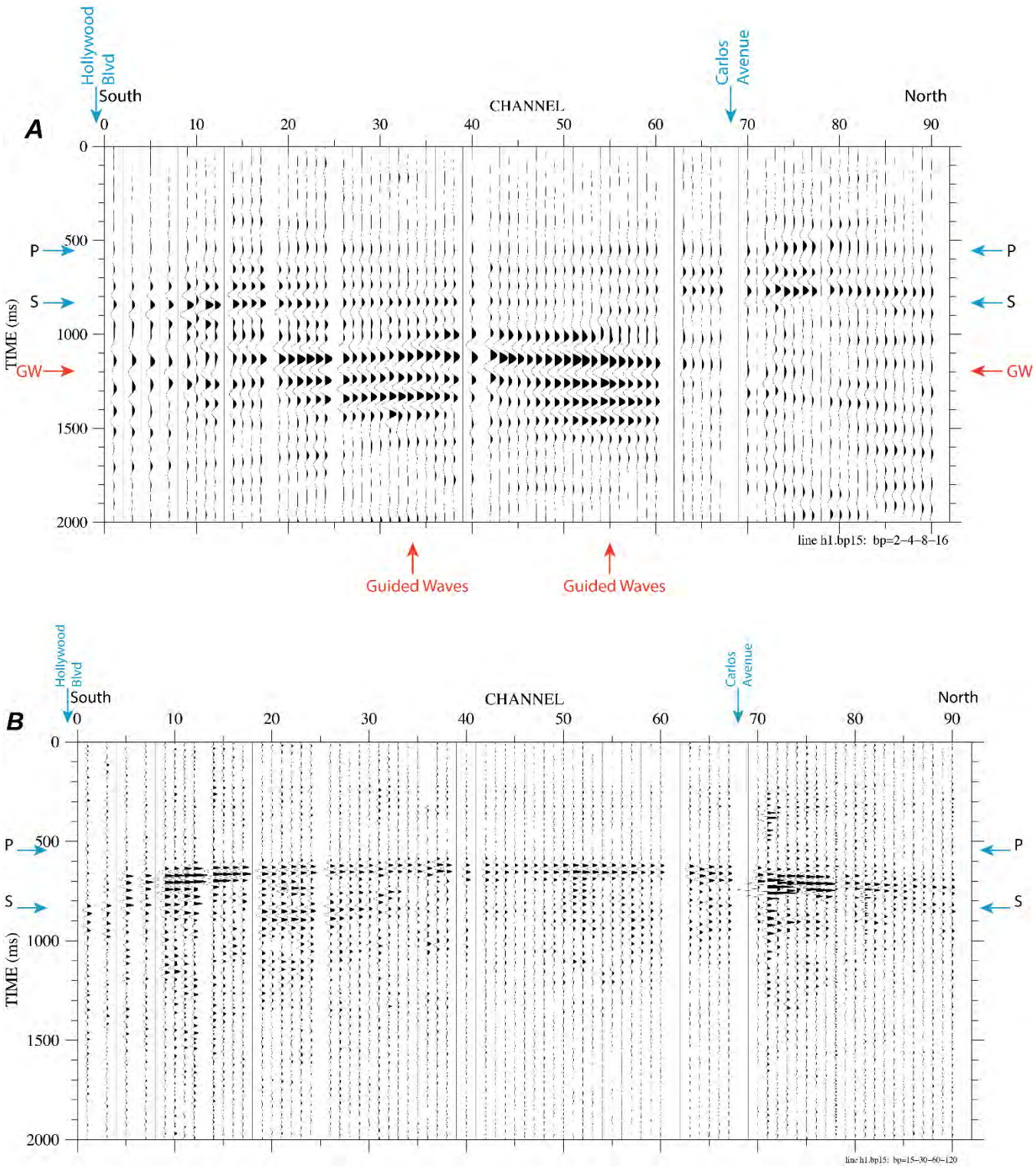

Figure 5. *A*, Stacked guided-wave shot gather for Profile HW1 (guided-wave survey HGW1). Source is located at SP1; recording array is located along Profile HW1. P waves (P), S waves (S), and guided waves (GW) are labeled on shot gather. Data were band-pass filtered between 2 and 16 Hz. *B*, Same shot gather as in *A*, but filtered between 15 and 120 Hz (note that only P-waves and partial S-waves are prominent at higher frequencies). Locations of nearby streets are shown. Other abbreviation: ms, millisecond(s).

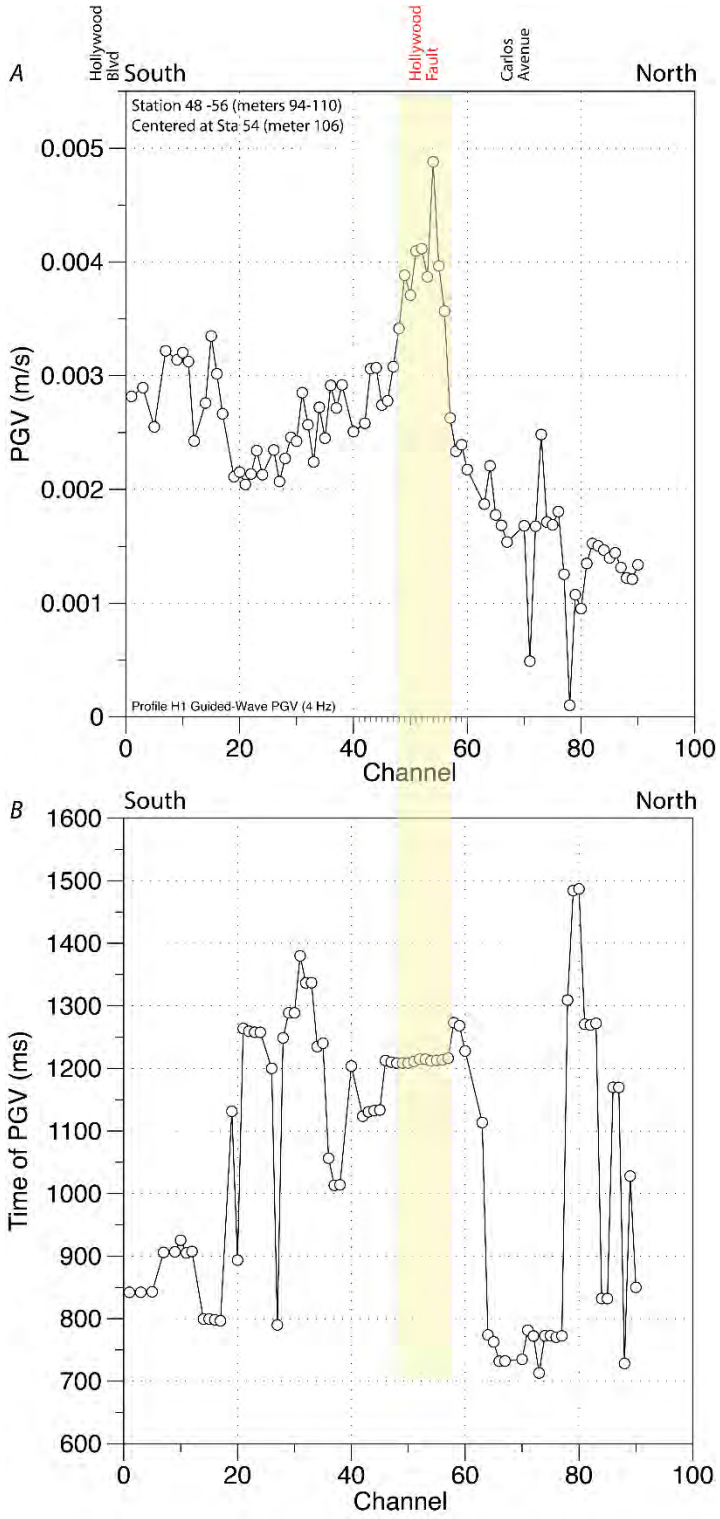

Figure 6. *A*, Plot of peak ground velocity (PGV) of guided waves for each recording channel along Profile HW1; highest PGV values (yellow shading) are concentrated between channels 48 and 56, and highest PGV value is at channel 54 (meter 106). *B*, Plot of time of arrival of corresponding PGV values shown in *A*; highest PGV values coincide with delayed phases that arrive at about 1,200 ms. As can be seen from shot gather (see fig. 5*A*), these delayed phases correlate with guided waves; zones of high PGV of guided waves are expected within near-surface fault zones. Locations of nearby streets are shown. Other abbreviations: m, meter(s); ms, millisecond(s); s, second(s).

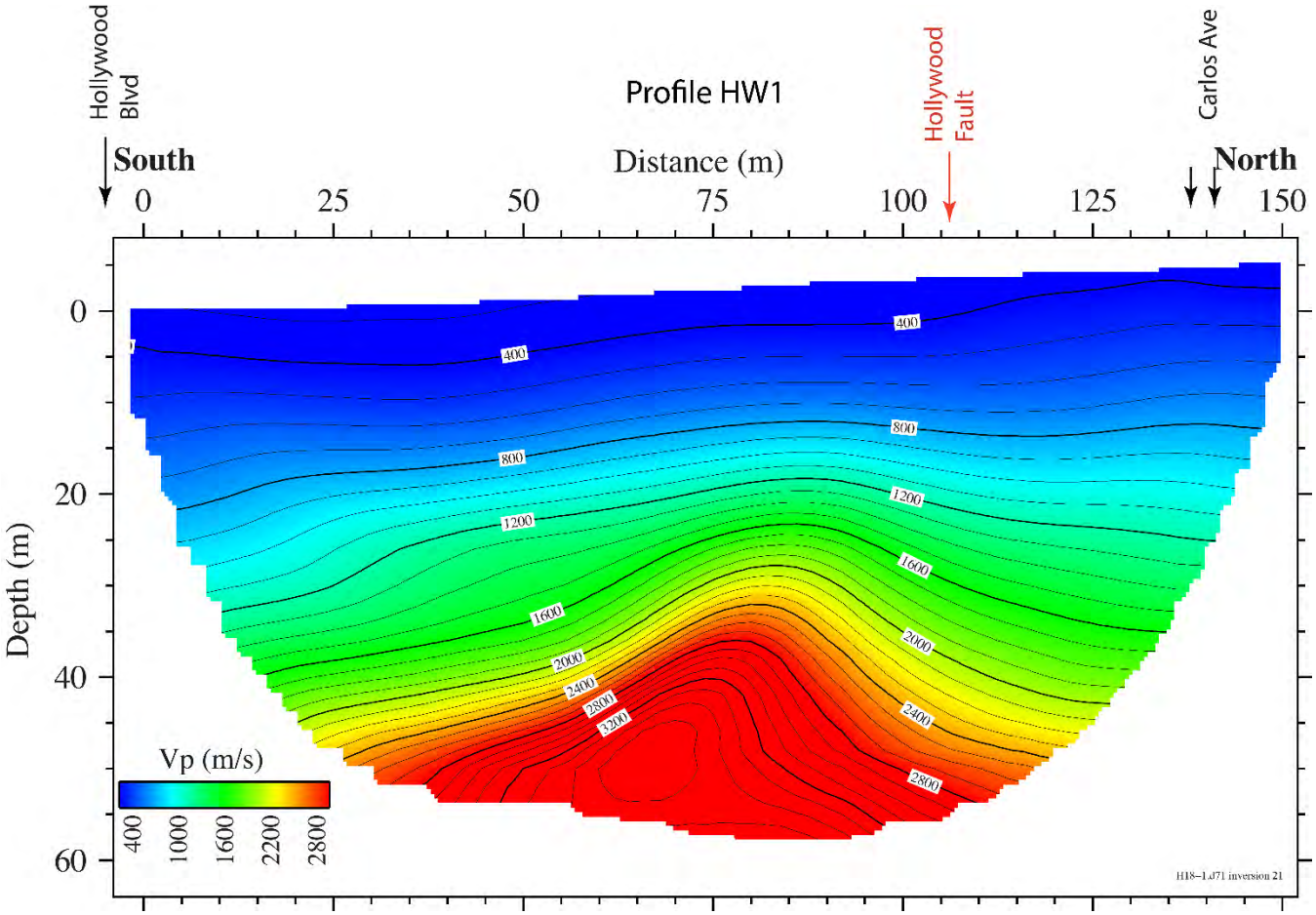

Figure 7. Tomographic P-wave velocity (V_P) model along Profile HW1, showing locations of nearby streets. Near-surface location of Hollywood Fault at meter 106 (as inferred by guided waves) correlates with sharp change in depth of 400-m/s velocity contour. At about 20 m depth, slightly south of inferred surface trace of Hollywood Fault, there is a zone of high velocities, especially velocities higher than about 1,500 m/s, which is consistent with a fault that acts as a groundwater barrier. Other abbreviations: m, meter(s); s, second(s).

400-m/s velocity contour is observed near meter 106 of the seismic profile, suggesting a lateral change in material properties there. This shallow change in materials overlies a deeper, dome-shaped set of velocity contours, suggesting a continuous change in velocities from the near-surface to the base of our velocity model. For V_P values in excess of 1,500 m/s, the apex of the dome is located at meter 90 at about 20-m depth. Overall, the dome-shaped structure dips to the south. We have observed such domelike velocity structures elsewhere where groundwater saturation, which typically has V_P of 1,500 m/s in sediments, abruptly changes across faults. Such structures typically result from ponding of groundwater against faults that act as ground-water barriers. However, ponding typically occurs on the topographically upslope side of faults, unless water flows parallel to the fault or over the top of a fault that does not reach the surface (Catchings and others 2014). We suggest that the approximate depth to the top of groundwater along Profile HW1 is indicated by the 1,500-m/s velocity contour.

Profile HW1 V_S Model

Our tomographic V_S model (fig. 8) shows that shear-wave velocities (V_S) along Profile HW1 range from about 200 m/s (at the surface) to about 490 m/s (at about 25-m depth). At shallow depths, V_S is lowest (~200 m/s) near meters 80 and between meters 95 and 106, but an abrupt change in V_S is

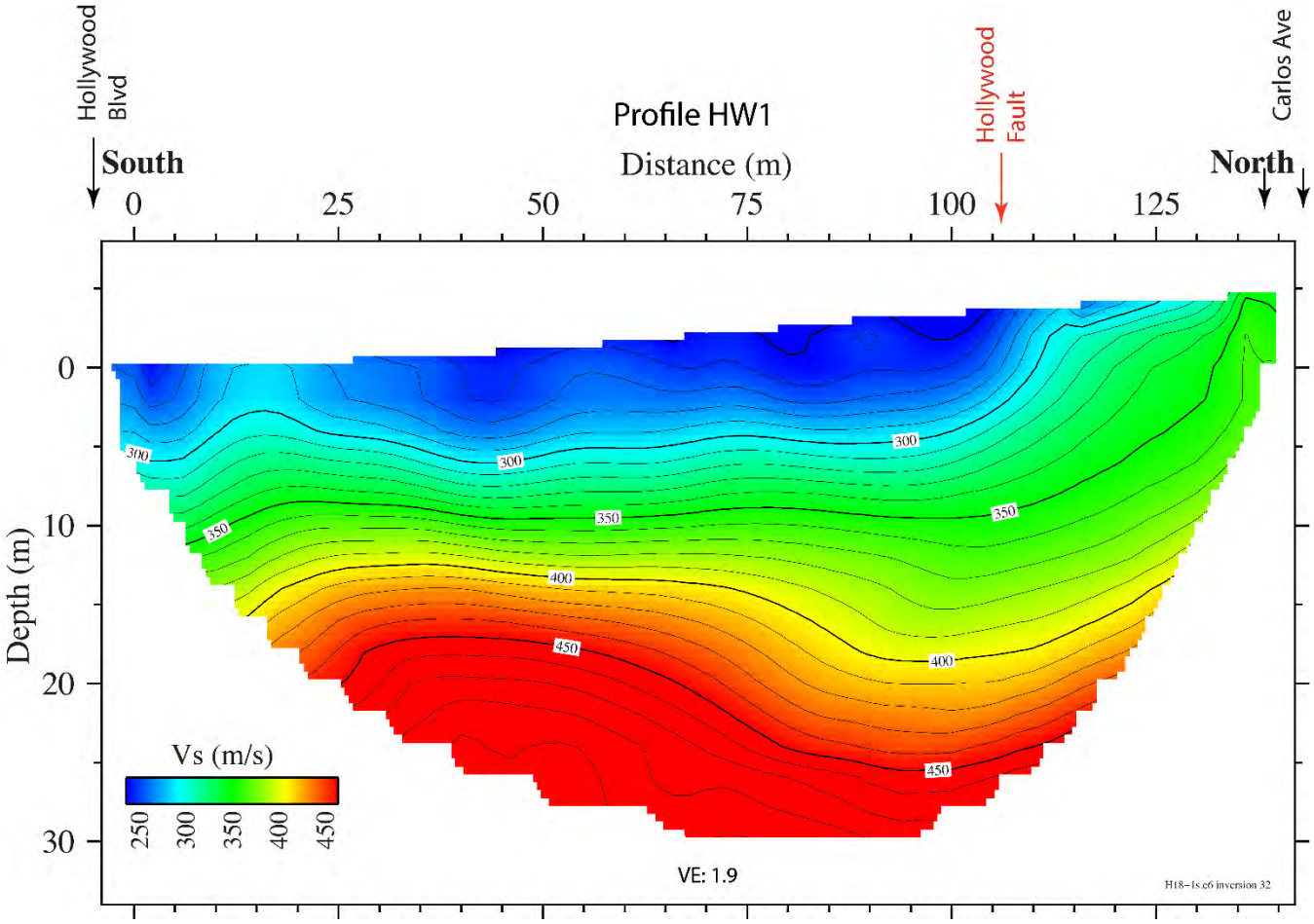

Figure 8. Tomographic S-wave velocity (V_S) model along Profile HW1, showing locations of nearby streets. Near-surface location of Hollywood Fault at meter 106 (as inferred by guided waves and P-wave velocities) correlates with a sharp change to higher velocities to the north and a relatively low-velocity zone at depths greater than about 15 m. Such near-vertical, S-wave, low-velocity zones are consistent with faulting. Other abbreviations: m, meter(s); s, second(s); VE, vertical exaggeration.

observed at about meter 106, where higher velocities occur at shallower depths to the north. This abrupt change in V_S continues vertically to the base of the velocity model at about 30 m depth. Zones of abrupt vertical changes in V_S are consistent with faulting because faults cause decreases in V_S owing to shearing. The general low-velocity zone associated with our interpreted fault dips about 79° to the south.

Profile HW1 V_P/V_S Ratios, Tomography Model

We developed a model of V_P/V_S ratios (fig. 9) along Profile HW1 by dividing V_P by V_S at each node of the velocity models. V_P/V_S ratios along Profile HW1 range from about 1 at the surface (in the south and extreme north) to about 4.4 at about 30-m depth (near meter 80). In a manner similar to the V_P structure along Profile HW1, we observe a domelike structure for all V_P/V_S values in the vicinity of meters 75 to 106, but the dome is most pronounced at depths greater than about 15 m. Overall, a slightly southward dip of the structure is observed. Water-saturated faults are expected to have high V_P/V_S ratios because the presence of water causes an increase in V_P, and also because shearing causes a larger decrease in V_S than V_P, resulting in high values of V_P/V_S. Typical hard rocks have V_P/V_S ratios of about 1.72, but sediments can have V_P/V_S ratios in excess of 3. Furthermore, Catchings and others (2014) showed that faulted sediments have higher V_P/V_S ratios beneath the groundwater table. Accordingly, we

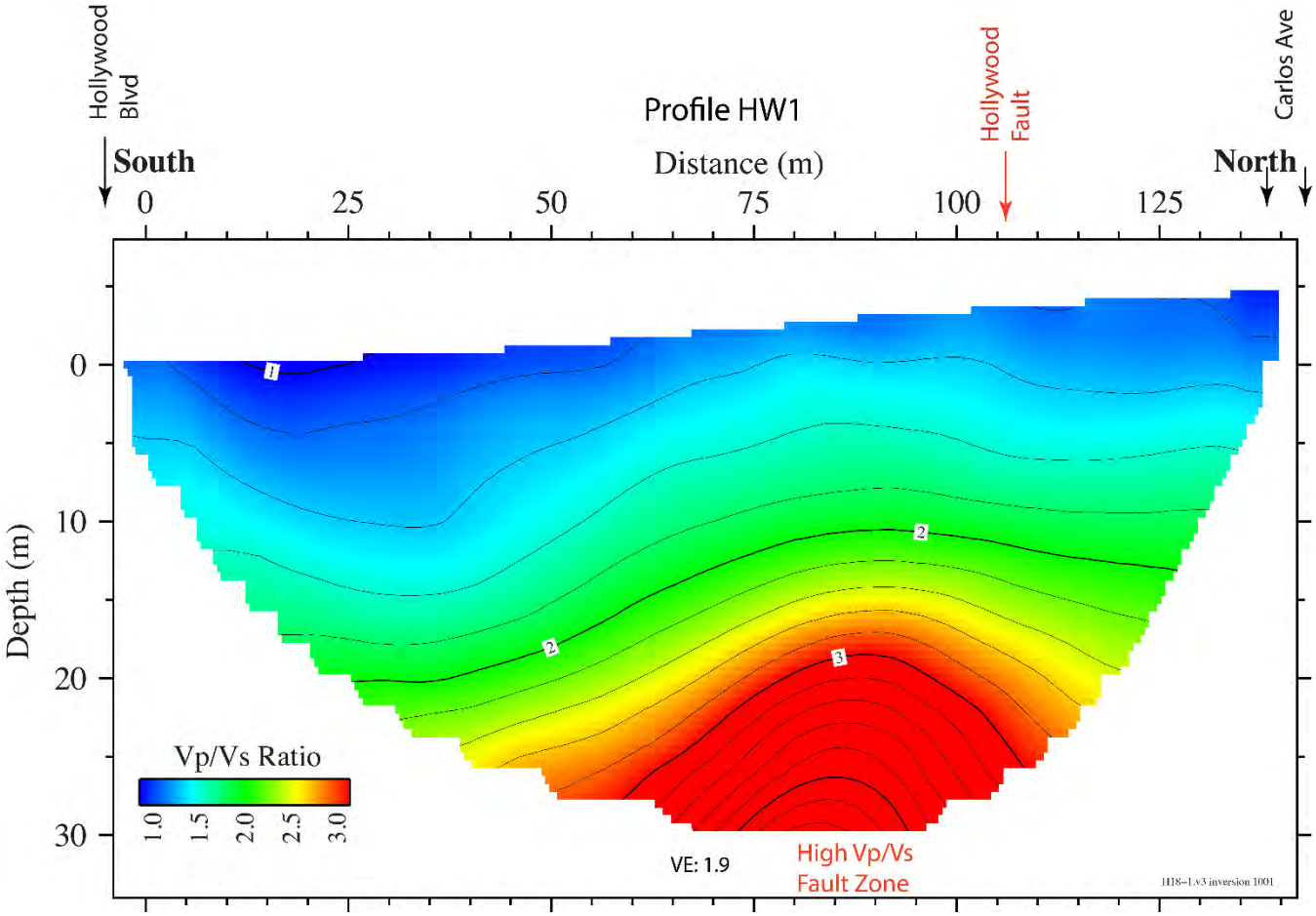

Figure 9. Tomographic V_P/V_S ratio model along Profile HW1, showing locations of nearby streets. Near-surface location of Hollywood Fault at meter 106 (as inferred by guided waves and P- and S-wave velocities) correlates with a shallow-depth zone of high V_P/V_S ratios. Below the inferred (1,500 m/s) water table, V_P/V_S ratios are unusually high (as high as 4.6) in upper 30 m; water-saturated fault zones typically have high V_P/V_S ratios. Other abbreviations: m, meter(s); s, second(s); VE, vertical exaggeration.

interpret the relatively high V_P/V_S ratios on Profile HW1 to be the result of groundwater variations associated with faulting.

Profile HW1 Poisson's Ratios, Tomography Model

We developed a model of Poisson's ratio (fig. 10) along Profile HW1 using the following relationship between V_P and V_S:

$$v = 3\mathrm{K} - \frac{2\mu}{6\mathrm{K}} + 2\mu \quad (1)$$

$$= \frac{\left[\left(\frac{\mathrm{Vp}}{\mathrm{Vs}}\right)^2 - 2\right]}{\left[2\left(\frac{\mathrm{Vp}}{\mathrm{Vs}}\right)^2 - 2\right]}, \quad (2)$$

where

v	is Poisson's ratio;
K	is the bulk modulus;
μ	is the shear modulus;

V_P is the P-wave velocity; and

V_S is the S-wave velocity.

The value of ν ranges from about 0.05 to about 0.45 along profile HW1. The very low values of ν are associated with the shallowest velocity structure (unsaturated zone), and the highest values occur in the deepest materials (below the water table). In the shallow subsurface, ν is most strongly influenced by groundwater saturation, but lithology (such as clays) also can have a strong influence. A ν value of 0.5 is indicative of a fluid, and, in shallow sediments, a ν value above about 0.43 to 0.44 has been associated with the top of the groundwater table (Catchings and others 2007, 2014). Overall, the ν structure along Profile HW1 is similar to the V_P/V_S ratio structure, which are both indicative of a water-saturated fault at depth.

Profile HW1 MAS$_R$W Model

Using Rayleigh waves that were recorded along Profile HW1, we used the MASW method to develop a second V_S model (fig. 11) for Profile HW1. However, the MASW method is inherently a one-

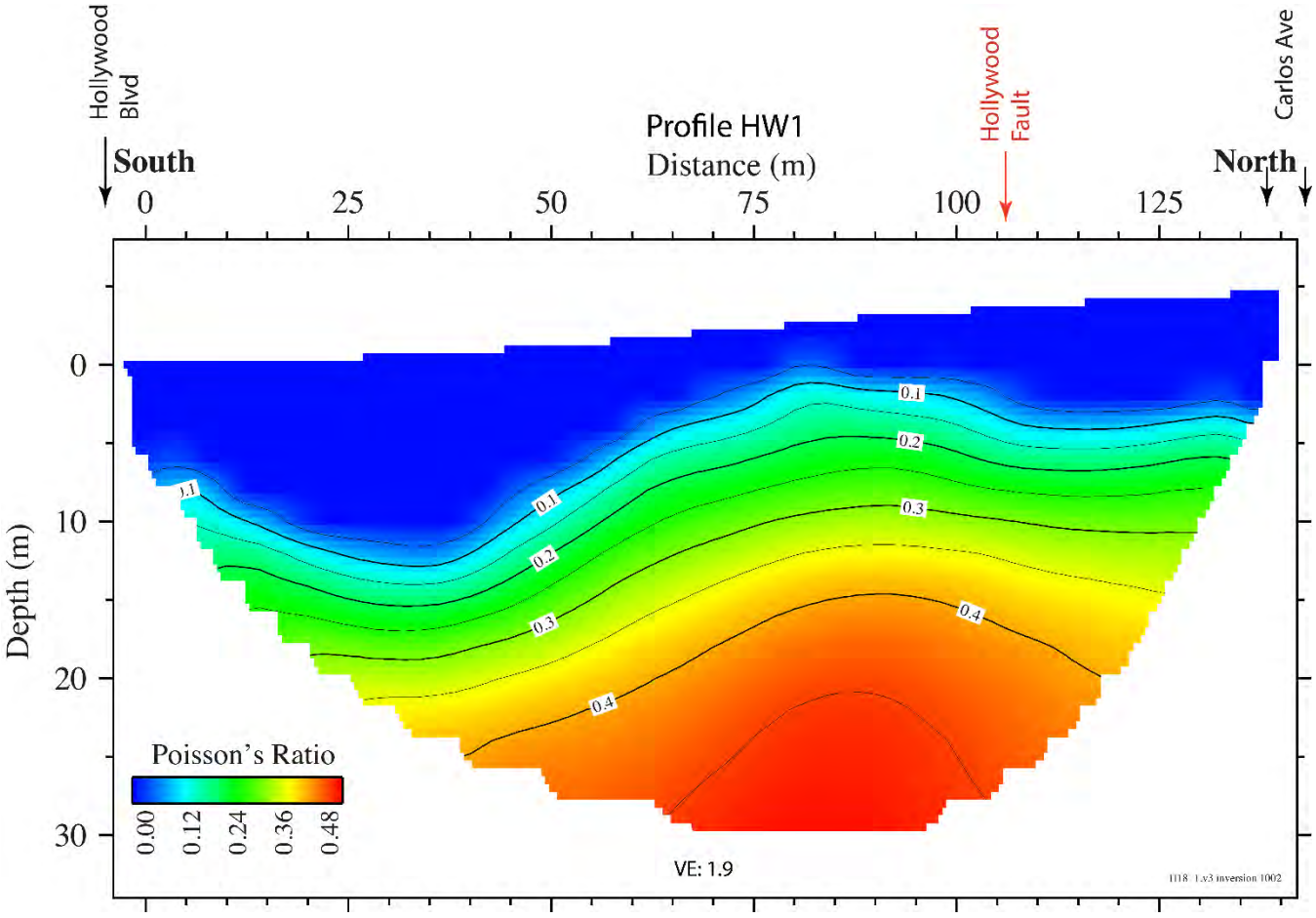

Figure 10. Tomographic Poisson's ratio model along Profile HW1, showing locations of nearby streets. Near-surface location of Hollywood Fault at meter 106 (as inferred by guided waves, P- and S-wave velocities, and V_P/V_S ratios) correlates with a shallow-depth zone of high Poisson's ratios. At depths of about 20 m, Poisson's ratios are shown to be as high as 0.45 below and slightly southwest of the surface trace of Hollywood Fault. Fluids have a Poisson's ratio of about 0.5, and Poisson's ratios of about 0.43 have been shown to correlate with groundwater table (Catchings and others, 2008). Water-saturated fault zones typically have high Poisson's ratios. Other abbreviations: m, meter(s); s, second(s); VE, vertical exaggeration.

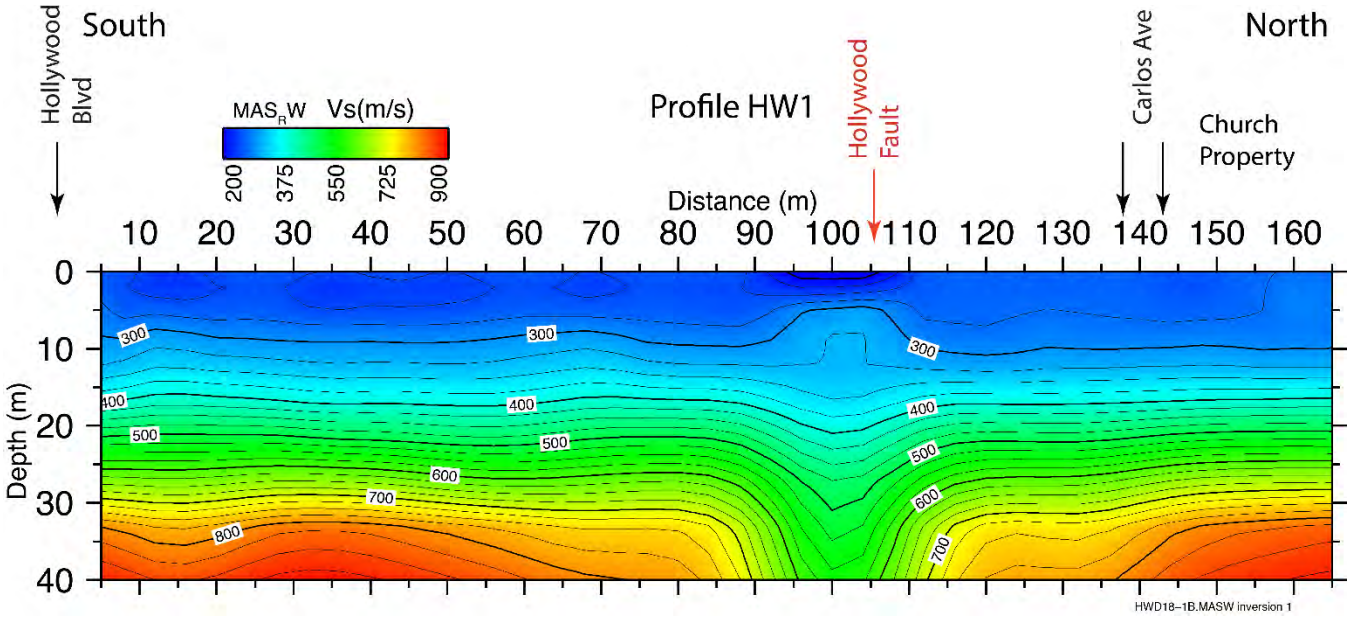

Figure 11. S-wave velocity (V_S) model inferred from Rayleigh waves, using multichannel analysis of surface waves (MASW) method. Near the inferred near-surface Hollywood Fault, our MASRW V_S model infers a zone of low V_S in upper few meters, underlain by a zone of high V_S at about 10 m and also a zone of low V_S to at least 40 m depth. Such near-vertical low-velocity zones are consistent with near-vertical faulting. Although details of the V_S model determined from MASW are slightly different from those of the V_S tomography model, both velocity anomalies are similar and are consistent with faulting near meter 106. Locations of nearby streets are shown. Other abbreviations: m, meter(s); s, second(s).

dimensional method, and, as a result, determination of V_S can be affected by lateral variations in structure, velocity, and topography. Nevertheless, the MASW method can provide an indication of lateral variations in V_S along Profile HW1. Our analysis of Rayleigh waves (MASRW) indicates that V_S along Profile HW1 ranges from about 200 m/s in the shallow subsurface (meters 95–105) to as much as 875 m/s at about 40-m depth. The shallowest V_S values are consistent between the tomography and the MASRW models, with minimum V_S values of about 200 m/s near meters 94 to 106, but MASRW-inferred V_S values are higher at depths greater than about 20 m in the MASRW model. In addition, the overall velocity structure is less variable and more linear in the MASRW model than the tomography model. However, both models suggest the presence of a general near-vertical low-velocity zone near meter 106 that extends to the base of the models. At about meter 106, the MASRW model indicates a more pronounced near-vertical low-velocity zone, which is highly consistent with a zone of near-vertical faulting (Catchings and others, 2014). Aligning the low-velocity contours in the MASRW model suggests that the shallow Hollywood Fault dips about 82° to the south.

Profile HW1 MASLW Model

Using Love waves recorded along Profile HW1, we developed a V_S model (fig. 12) using the MASW method. Our MASLW modeling indicates that V_S ranges from about 250 m/s at shallow depths to about 675 at about 50-m depth. Although the overall MASLW model varies from both the MASRW model and the tomography model, V_S and the overall V_S structure have similarities to those of both the tomography and MASRW models. In particular, the near-vertical low-velocity zone in the vicinity of meters 102 to 120 is seen in all the models and is consistent with a fault in that area. However, whereas the MASRW and tomography models and the asymmetry of the PGV of guided waves suggest a slight

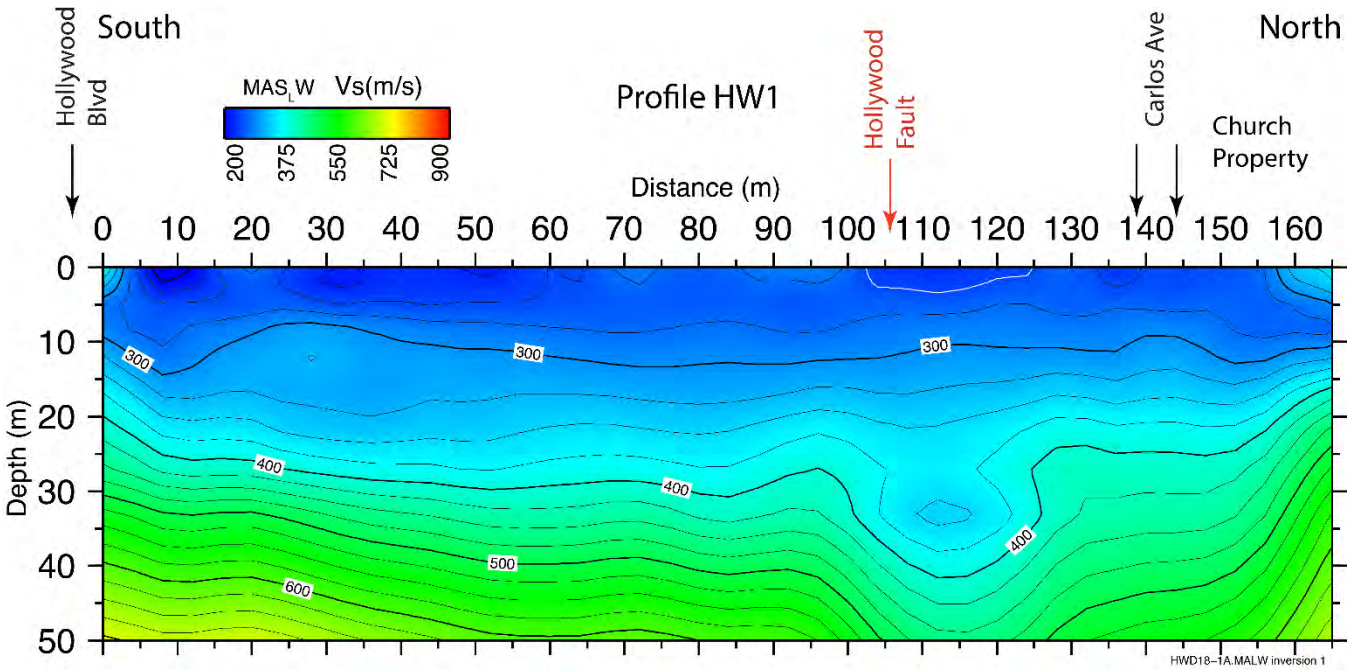

Figure 12. S-wave velocity (V_S) model inferred from Love waves, using multichannel analysis of surface waves (MASW) method. Near the inferred near-surface Hollywood Fault, our MAS_LW V_S model infers zones of low V_S in upper few meters and also below about 20 m depth. Such near-vertical low-velocity zones are consistent with near-vertical faulting. Although details of V_S models determined from MAS_RW, MAS_LW, and tomography differ in absolute velocity, velocity anomalies determined from all three methods are similar and are consistent with faulting. Locations of nearby streets are shown. Other abbreviations: m, meter(s); s, second(s).

southward fault dip at shallow depths, the MAS_LW model indicates a slight northward (79°) fault dip at shallow depths, on the basis of the observed low-velocity contours.

Profile HW1 V_P/V_S (V_P Tomography and V_S MAS_RW) Model

Using V_P from our tomography model (fig. 7) and the V_S from our MAS_RW model (fig. 11), we developed a hybrid V_P/V_S–ratio model (fig. 13) along Profile HW1. Our tomographic/MAS_RW hybrid V_P/V_S–ratio model suggests that V_P/V_S ratios range from about 1.2 at the surface to 3.8 at 40-m depth. This range of values in hybrid V_P/V_S ratios is slightly lower than the maximum V_P/V_S ratio value (4.4) indicated by the tomographic V_P/V_S–ratio model (fig. 9); however, the hybrid V_P/V_S–ratio model indicates a pronounced high V_P/V_S–ratio (up to 3.8) zone centered at about meters 100 to 105, similar to the high value (4.4) in the tomographic V_P/V_S–ratio model. Because water-saturated fault zones are expected to cause concentrated high V_P/V_S–ratio zones, we suggest that the relatively wide zone of high V_P/V_S ratios at depth in the hybrid model is likely indicative of a wider fault zone in the upper 40 m depth of the velocity model. The hybrid V_P/V_S–ratio image indicates an overall near-vertical fault that is centered near meter 100; however, this image is also consistent with the presence of adjacent splay faults.

Profile HW1 V_P/V_S (V_P Tomography and V_S MAS_LW) Model

Using V_P from our tomography model (fig. 7) and the V_S from our MAS_LW model (fig. 12), we developed a second hybrid V_P/V_S–ratio model (fig. 14) along Profile HW1. Our tomographic/MAS_LW hybrid V_P/V_S–ratio model suggests that V_P/V_S ratios range from about 1.5 at the surface to 6.0 at 40- to 50-m depth, with pronounced high values being observed beneath the central part of the profile. In the

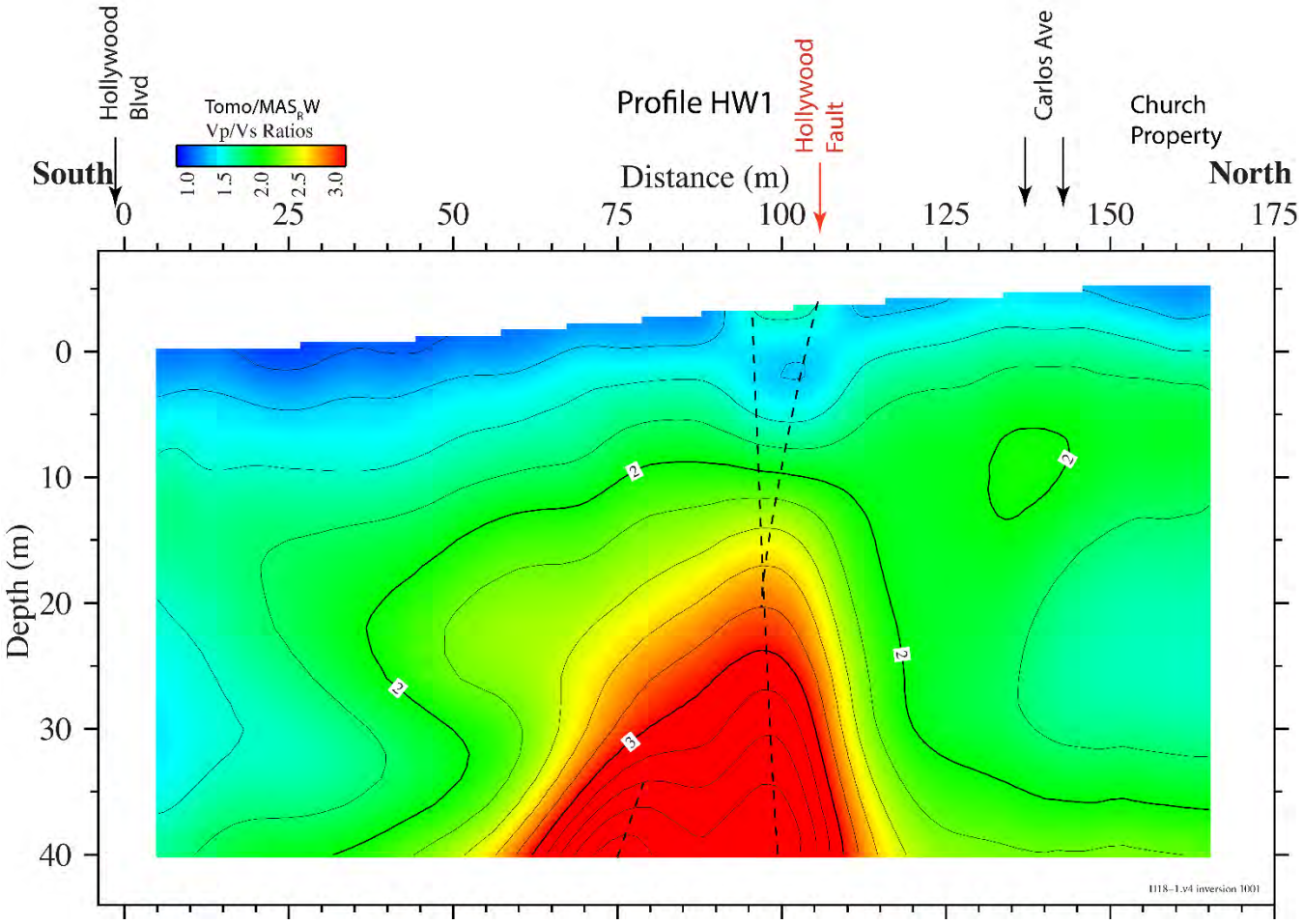

Figure 13. V_P/V_S ratio model along Profile HW1 derived from a combination of our V_P tomography model and our MASRW V_S model. A zone of locally high V_P/V_S ratios occurs near the near-surface trace of Hollywood Fault (dashed lines), as inferred by multiple models in this study. Near-vertical zone of high V_P/V_S ratios is concentrated beneath the near-surface fault trace, as has been seen for other fault zones. Locations of nearby streets are shown. Other abbreviation: m, meter(s).

upper 30 m, all three V_P/V_S–ratio models infer similar structures, but the hybrid V_P/V_S–ratio models suggest a wider fault zone at depth and infer possible northward and southward dips.

Profile HW1 P-Wave Reflection Stack

Using P-wave shot gathers from Profile HW1, we developed a low-resolution P-wave seismic reflection image (stack) of the shallow subsurface (fig. 15). The P-wave reflection stack indicates the presence of predominantly subhorizontal layering in the upper 20 m, with apparent slight folding centered near meter 100 of the profile. This unmigrated image suggests the presence of strong diffractions below about 20-m depth, centered near meter 100. Diffractions are caused by sharp boundaries in the subsurface, and faulting, which vertically offsets layers, is a typical cause of such diffractions, particularly when the diffractions are subvertically aligned, as seen in figure 15. Thus, the P-wave reflection image is consistent with a near-vertical fault located near meter 100. By aligning the diffractions over depths that range from about 20 to about 120 m, the alignment of diffractions suggests that the fault dips about 87° northward below 20-m depth (fig. 15). In addition, significant noise or surface waves is seen in the southern part of the reflection image, making it difficult to resolve the

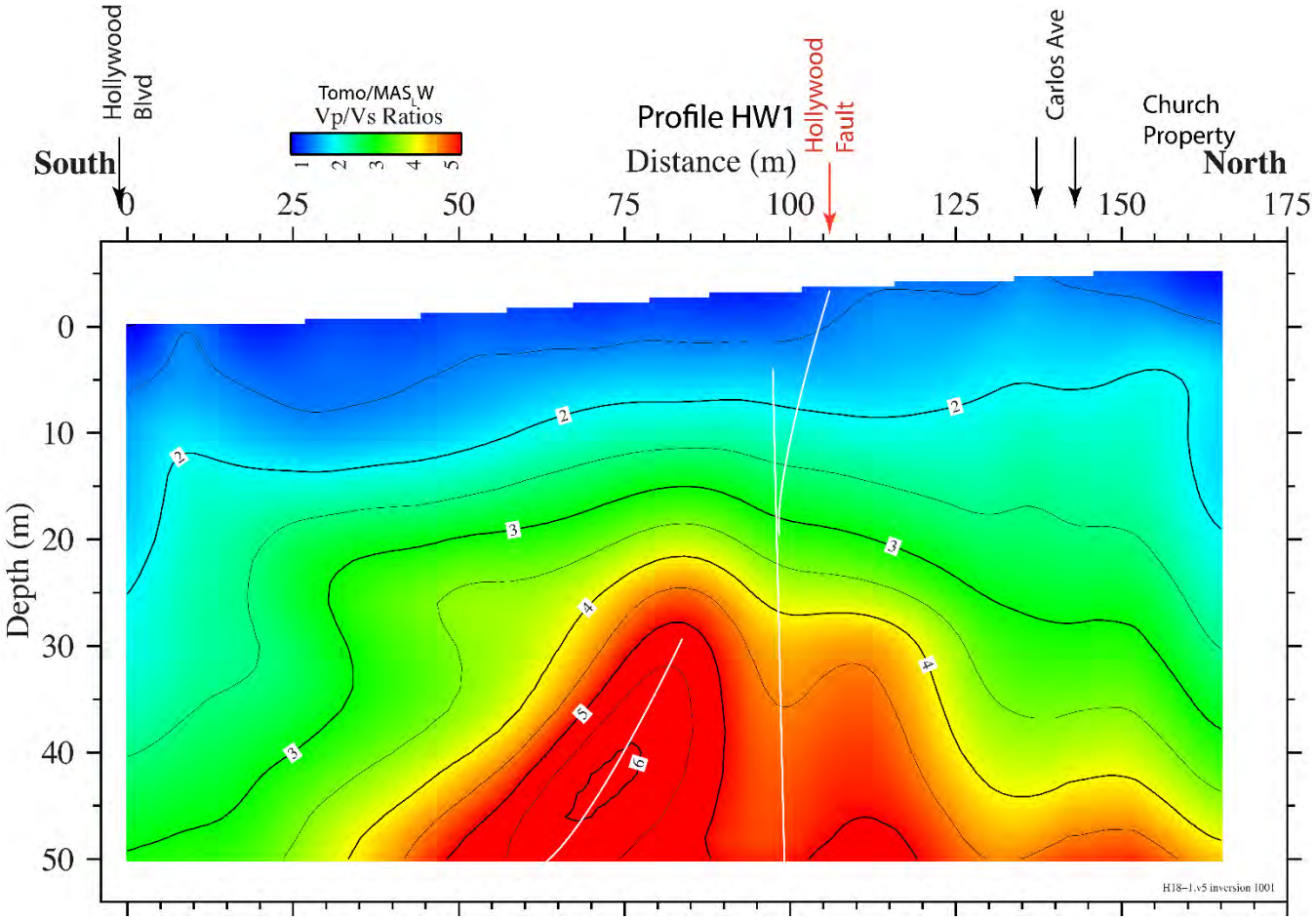

Figure 14. Poisson's ratio model along Profile HW1 derived from combination of our V_P tomography model and our MAS$_L$W V_S model. A zone of locally high Poisson's ratios occurs near the near-surface trace of Hollywood Fault (white lines), as inferred by multiple models in this study. Near-vertical zone of high Poisson's ratios is concentrated near the near-surface trace of Hollywood Fault, as has been seen for other fault zones. Locations of nearby streets are shown. Other abbreviation: m, meter(s).

structure along the south half of Profile HW1. The strong energy likely arises from either the Los Angeles Metro Rail (subway) Redline trains or car traffic along Hollywood Boulevard.

Profile HW1 S-Wave Reflection Stack

Using S-wave shot gathers from Profile HW1, we developed a low-resolution S-wave seismic reflection image (stack) of the shallow subsurface (fig. 16). The S-wave reflection stack also indicates the presence of predominantly subhorizontal layering and an apparent fold centered near meter 100. Aligning the apex of the apparent fold—from about 20 to about 125 m—suggests that the deeper fault dips about 87 degrees northward, with the possibility of a splay fault dipping about 79° southward near the surface. High noise levels on the south end of the profile interferes with the seismic signal, making it difficult to delineate any possible fault structures.

Summary of Seismic Indicators of Faulting along Profile HW1

We evaluated 13 different seismic images along Profile HW1, including (1) PGV of guided waves, (2) tomographic V_P, (3) tomographic V_S, (4) tomographic V_P/V_S ratios, (5) tomographic Poisson's ratios, (6) MAS$_R$W V_S, (7) MAS$_L$W V_S, (8) hybrid tomography/MAS$_R$W V_P/V_S ratios, (9) hybrid

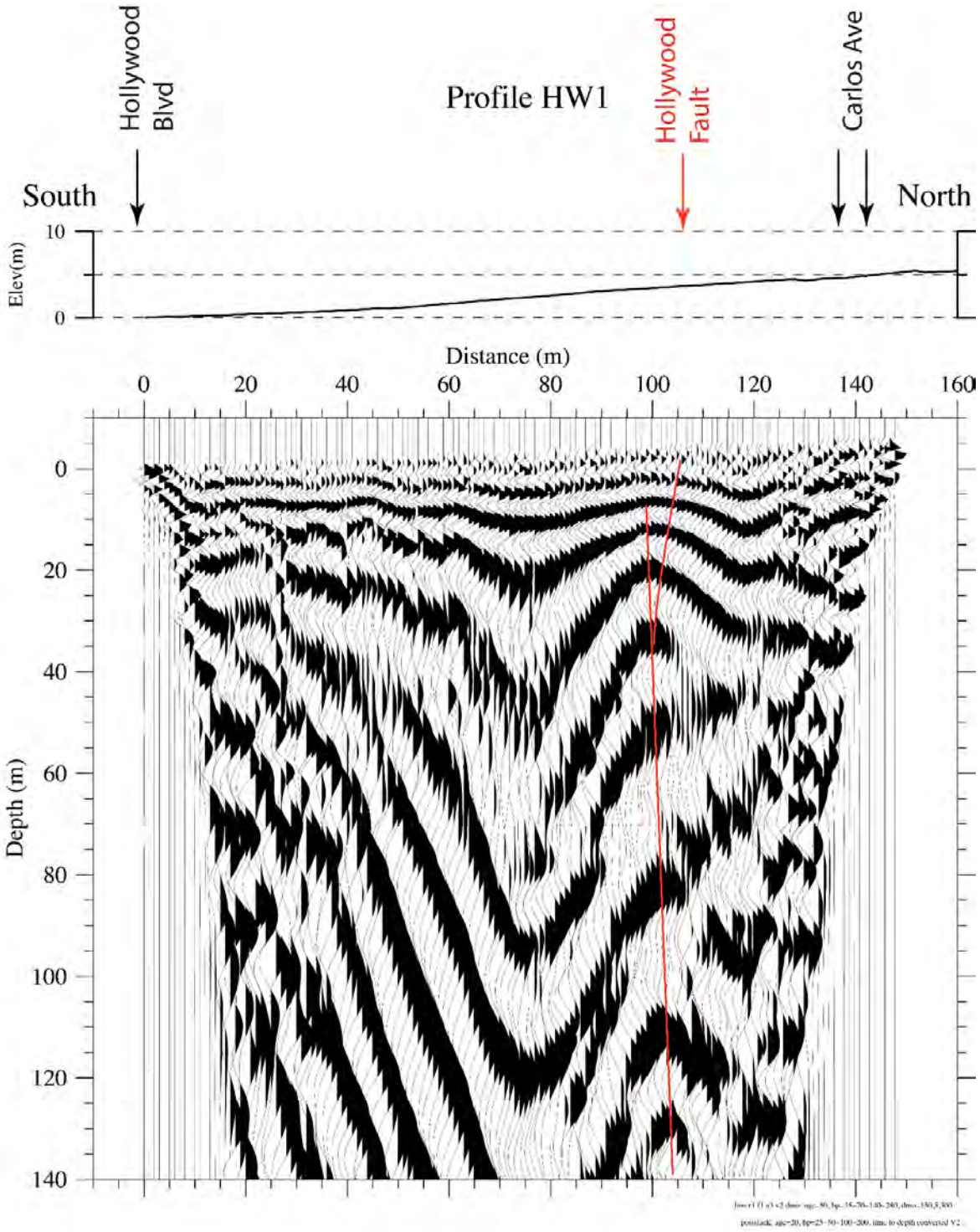

Figure 15. Low-resolution P-wave reflection stack for Profile HW1. Strong diffractions are apparent beneath the inferred location of Hollywood Fault (red lines), beginning at about 10 m depth and extending to base of reflection image. Such diffractions are typically seen on unmigrated reflection images of faulted strata. Locations of nearby streets are shown. Abbreviation: m, meter(s).

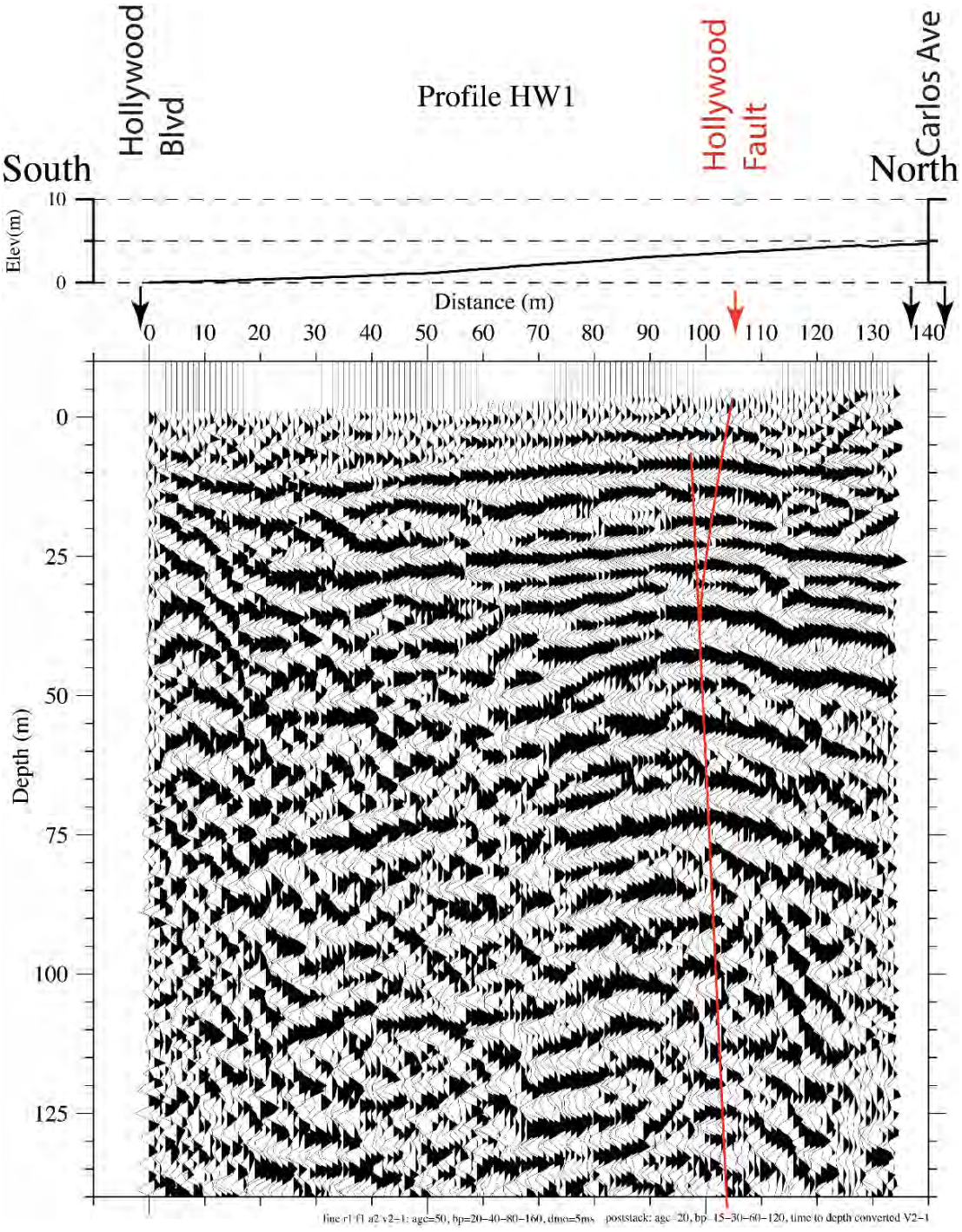

Figure 16. Low-resolution S-wave reflection stack for Profile HW1. Folds and diffractions are apparent beneath the inferred location of Hollywood Fault (red lines), beginning at about 10 m depth and extending to base of reflection image. Such disrupted layering is typically seen on reflection images of faulted strata. Locations of nearby streets are shown. Abbreviation: m, meter(s).

tomography/MAS$_R$W Poisson's ratios, (10) hybrid tomography/MAS$_L$W V_P/V_S ratios, (11) hybrid tomography/MAS$_L$W Poisson's ratios, (12) P-wave reflection, and (13) S-wave reflection. All 13 images presented here are consistent with a near-vertical fault located near meters 100 to 106 of Profile HW1. We suggest that the guided-wave results are likely most diagnostic of the location of faulting nearest the surface.

Guided-Wave Results for Profile HW2

We evaluated two guided-wave seismic datasets recorded along Profile HW2, and both were recorded on the night of May 24, 2018, using the same recording system as was used along Profile HW1. However, the recording array for Profile HW2 was located along North Argyle Avenue, where significant traffic noise occurs. A total of 123 recording stations were surveyed along Profile HW2, but seismographs were not deployed at 11 stations owing to the presence of obstacles such as driveways and buried pipes. Of the stations deployed, six seismographs did not record data.

The first guided-wave survey (HGW2) along Profile HW2 used the same source location (SP1) as was used for the HGW1 guided-wave survey along Profile HW1 (fig. 2). A total of 157 AWD shots were stacked to generate the guided waves for the HGW2 guided-wave survey. The perpendicular distance from SP1 to Profile HW2 was approximately 560 m, with longer distances to the north and to the south of the profile. The seismic sources (shots) for the HGW2 survey began on May 24, 2018, at 20:24:43 (local time) and continued until 20:43:33.

The second guided-wave survey (HGW3) recorded along Profile HW2 used the same recording array as was used in the HGW2 survey; however, the seismic source (SP2) was located near the center of the Profile HW1 recording array (fig. 3), such that SP2 was located at the fault location inferred from an earlier borehole survey. The perpendicular distance from SP2 to Profile HW2 (Argyle Avenue) was approximately 350 m. We used a total of 151 AWD shots (stacked) to generate guided waves for the HGW3 seismic survey. The HGW3 survey shots began on May 24, 2018, at 21:29:37 (local time) and continued until 21:47:09. Ten of the seismographs used during the HGW3 survey did not record data.

Data Analysis for Guided-Wave Survey HGW2

Guided waves from the HGW2 survey were not easily identified because of high cultural-noise levels along Profile HW2 (North Argyle Avenue). In addition, heavy traffic along the overpass (Highway 101) over North Argyle Avenue, as well as heavy traffic on Hollywood Boulevard and subway trains, appear to be the major sources of noise that significantly reduced the signal-to-noise ratio of the HGW2 data. However, with approximately 157 stacked shots, the S-wave and later arrivals can be identified from data derived from the southern part of the HGW2 survey (fig. 17). From those data, we measured the PGV of the data from about 0.8 to about 2.0 s. The highest PGV values appear to be concentrated near Carlos Avenue and south of Yucca Street (figs. 18*A*, *B*) for the HGW2 survey. Although we urge extreme caution in evaluating the PGV of guided waves from such noisy data, the data suggest that guided waves may have been recorded south of Carlos Avenue and south of Yucca Street. The relatively high PGV values near Carlos Avenue and Yucca Street occur at times consistent with those expected for guided waves, traveling at about 50 percent of the apparent V_S.

We also evaluated data north of Yucca Street, but the noise levels from the Highway 101 overpass were so high that we did not include those data in this report. We also observed relatively high PGV values between Yucca Street and Highway 101, but owing to the high cultural-noise levels, we have little confidence that the high PGV values are derived from guided waves. Thus, we suggest that the guided waves recorded on the HGW2 survey are indeterminate with respect to faulting and that performing a survey later at night, when cultural and highway noises are less prevalent, might have been more determinate.

Data Analysis for Guided-Wave Survey HGW3

We acquired the HGW3 survey with the source at SP2 (First Presbyterian Church of Hollywood parking lot) and the recording array located along Profile HW2 (North Argyle Avenue). Data from the HGW3 survey also are very noisy (fig. 18) owing to the same noise sources described above for the HGW2 survey. It appears that those noise sources were even greater than was observed during the

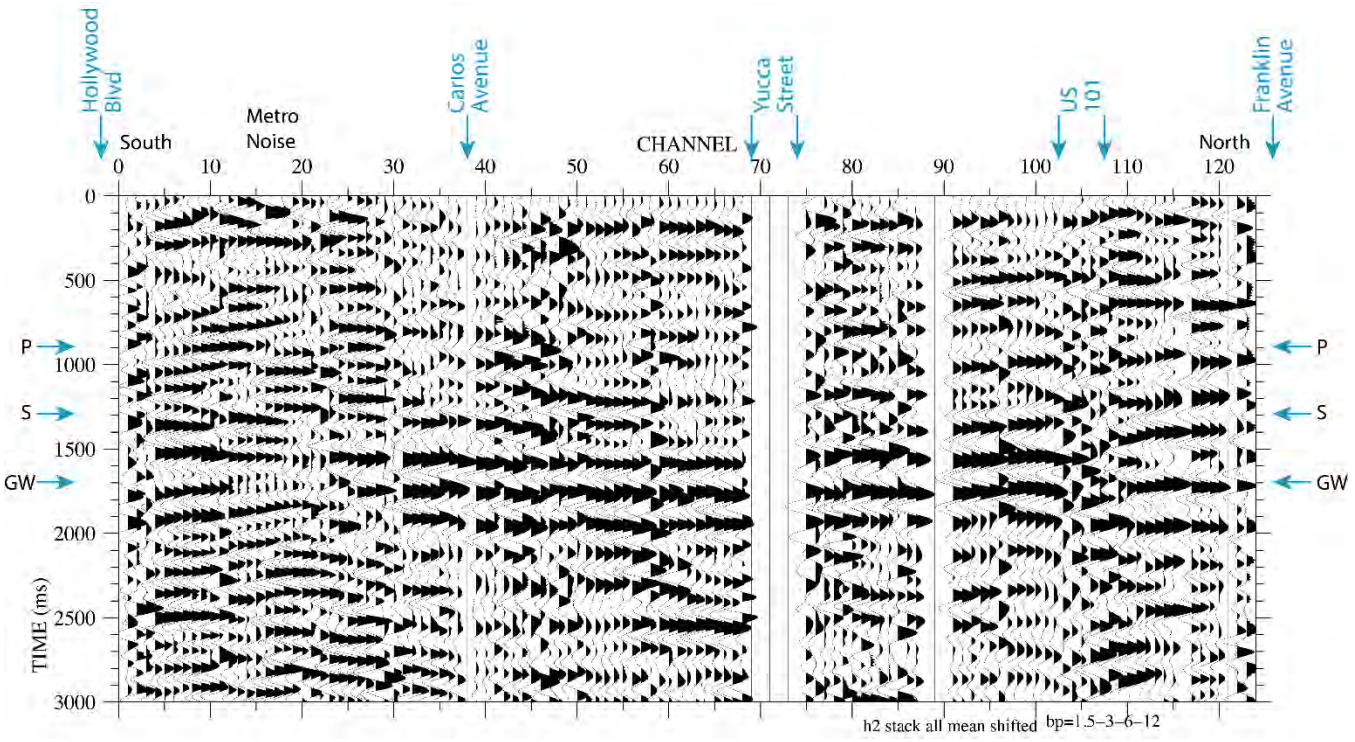

Figure 17. Stacked guided-wave shot gather for Profile HW2 (guided-wave survey HGW2). Source is located at SP1; recording array is located along Profile HW2. Source and recording array are separated by about 560 m. High levels of cultural noise, which are prevalent before the P-wave arrival, are shown on shot gather, especially between channels 1 and 30 and near channel 105. Such high levels of cultural noise make it difficult to evaluate guided waves. P waves (P), S waves (S), and guided waves (GW) are inferred on shot gather. Data were band-pass filtered between 1.5 and 12 Hz. Locations of nearby streets are shown. Other abbreviation: ms, millisecond(s).

HGW1 survey, possibly because there was less traffic during the 21:00 hour time frame, which may have allowed for faster moving vehicles and greater overall noise.

With 151 shots stacked, the main S-wave and apparent guided waves were difficult to identify on the shot gather (fig. 19). However, from the stacked data, we measured PGV values for the part of the survey that was south of Yucca Street (figs. 20*A, B, C, D*). We observe high PGV values in nearly the same location as seen from the HGW2 seismic survey, particularly south of Carlos Avenue and south of Yucca Street. However, we also observe high PGV values slightly north of Hollywood Boulevard, which are likely attributable to noises from the subway and from traffic on Hollywood Boulevard because the travel times are inconsistent with those expected for guided waves. In contrast, the high PGV values south of Carlos Avenue and south of Yucca Street occur at the approximate time expected for guided waves when the source is located at SP2.

Tomography, MASW, and Reflection Results for Profile HW2

We acquired an in-line, active-source P-wave seismic survey (HRR3) along Profile HW,2 using P-wave shots and vertical-component sensors that were attached (via refraction cables) to two Geometrics RX-60, multichannel seismographs. Unlike the guided-wave surveys (HGW2 and HGW3), we did not deploy sensors north of Yucca Street owing to the difficulty in deploying cables across Yucca Street; thus, the HRR3 survey was only about 200 m long. We used 66 vertical-component sensors and 63 AWD shot points for the HRR3 seismic survey. The AWD shots and sensors were colocated (1.5 m lateral offset) and spaced at 3-m intervals. The data were recorded for 2 s at a sampling

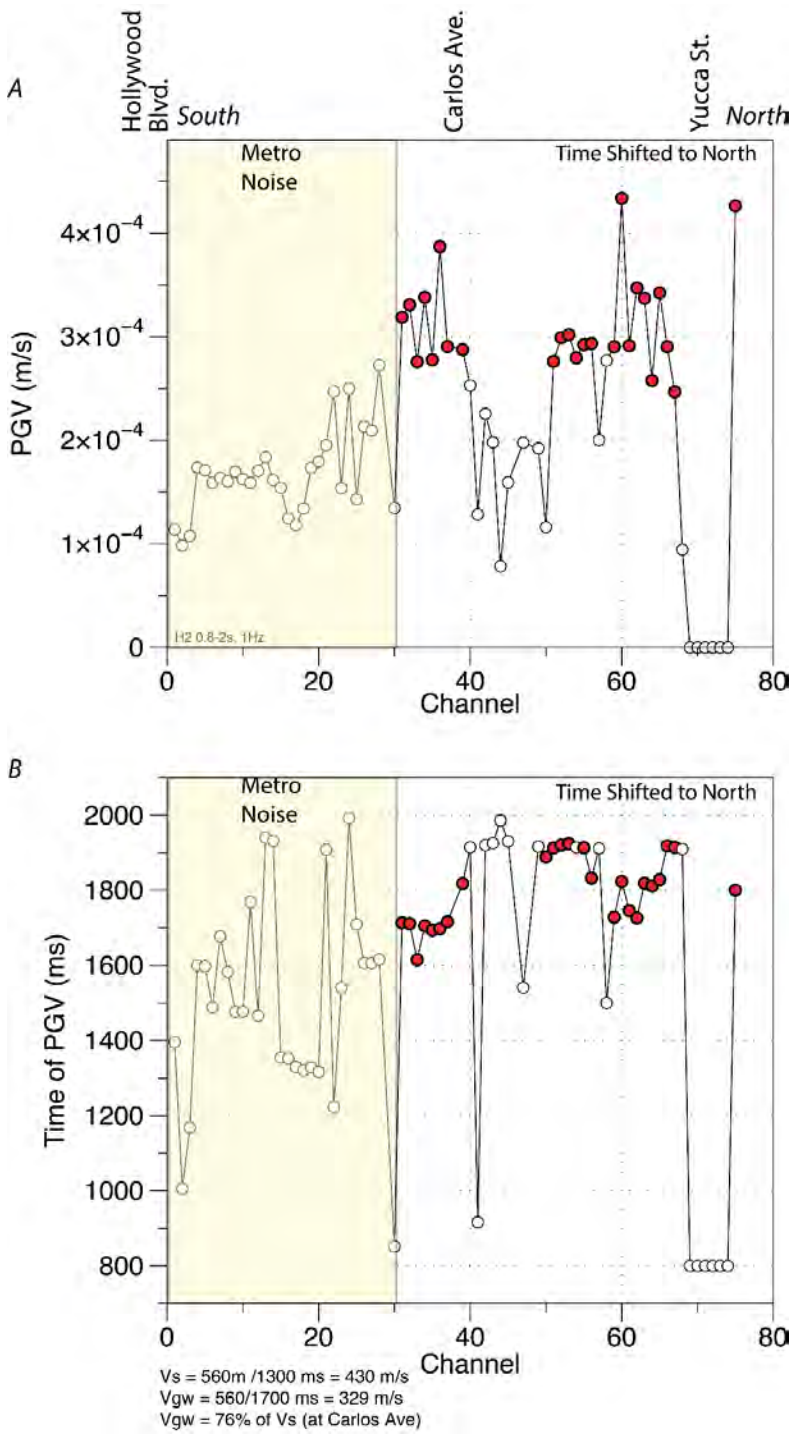

Figure 18. *A*, Plot of peak ground velocities (PGV) of guided waves for each recording channel along part of Profile HW2 (guided-wave survey HGW2), showing locations of nearby cross streets. Owing to high levels of cultural noise from Highway 101 north of Yucca Street, PGV values for channels north of Yucca Street were deleted from plot. Yellow shading highlights channels that have high levels of cultural noise south of Carlos Avenue (see fig. 17). *B*, Plot of travel times from SP1 to Profile HW2. Travel times on north end of Profile HW2 were shifted to allow analysis within a limited time window, as higher propagation velocities on north end of profile resulted in shorter travel times. High PGV values on PGV plot correlate with delayed travel times on travel-time plot. Although contaminated with noise, high PGV values (red dots) may infer possible fault locations along profile HW2. Other abbreviations: m, meter(s); ms, millisecond(s); s, second(s).

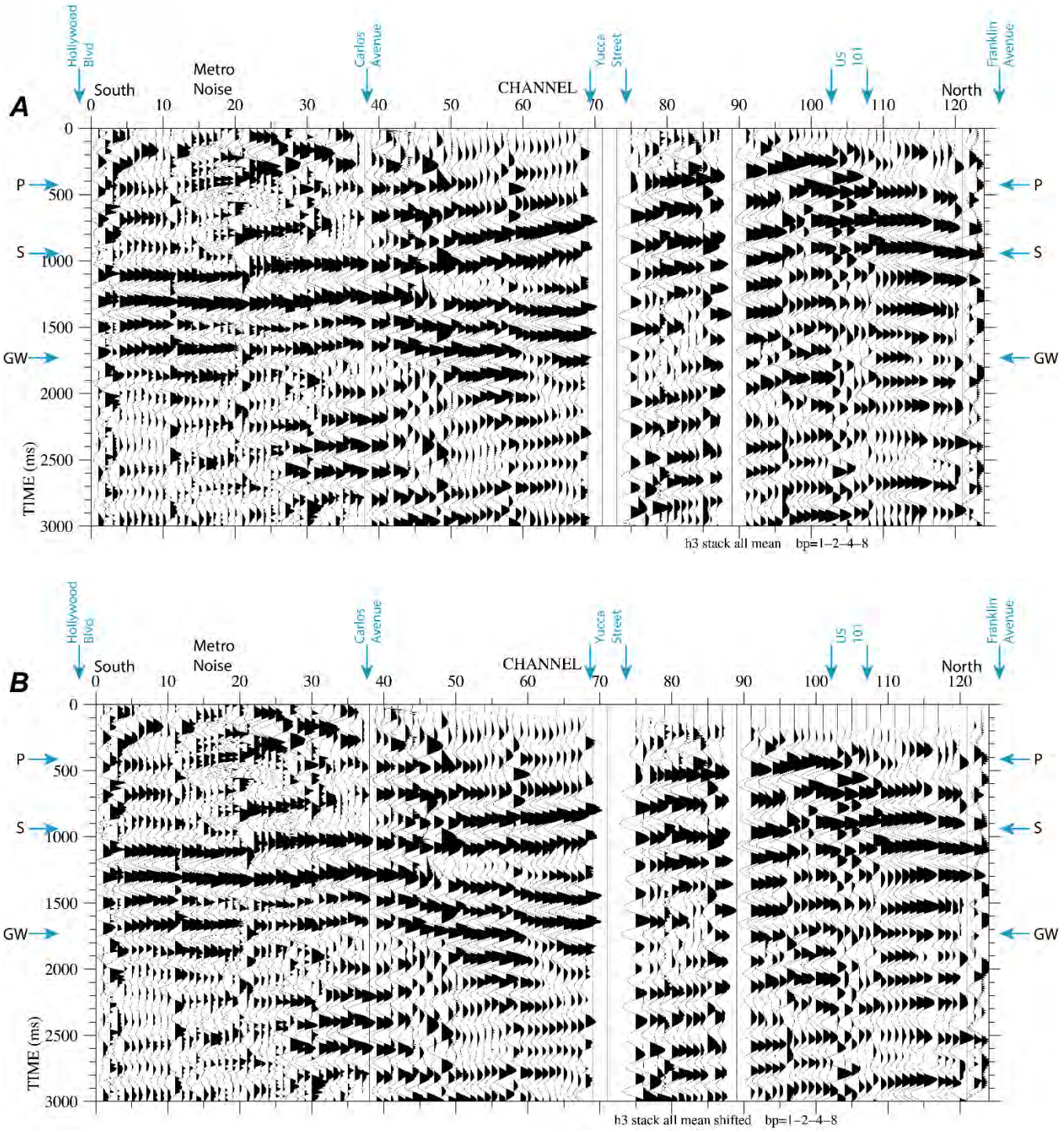

Figure 19. Stacked guided-wave shot gathers for Profile HW2 (guided-wave survey HGW3), showing (*A*) without time shifts to account for differences in propagation velocities and (*B*) with time shifts to account for differences in propagation velocities. Source was located at SP2: recording array was located along Profile HW2. There is about 350 m between the source and the recording array. High levels of cultural noise, which are prevalent before P-wave arrival, are shown on shot gather, especially between channels 1 and 30 and near channel 105. Such high levels of cultural noise make it difficult to evaluate guided waves. P waves (P), S waves (S), and guided waves (GW) are inferred on shot gather. Data were band-pass filtered between 1.5 and 12 Hz. Locations of cross streets are shown. Other abbreviation: ms, millisecond(s).

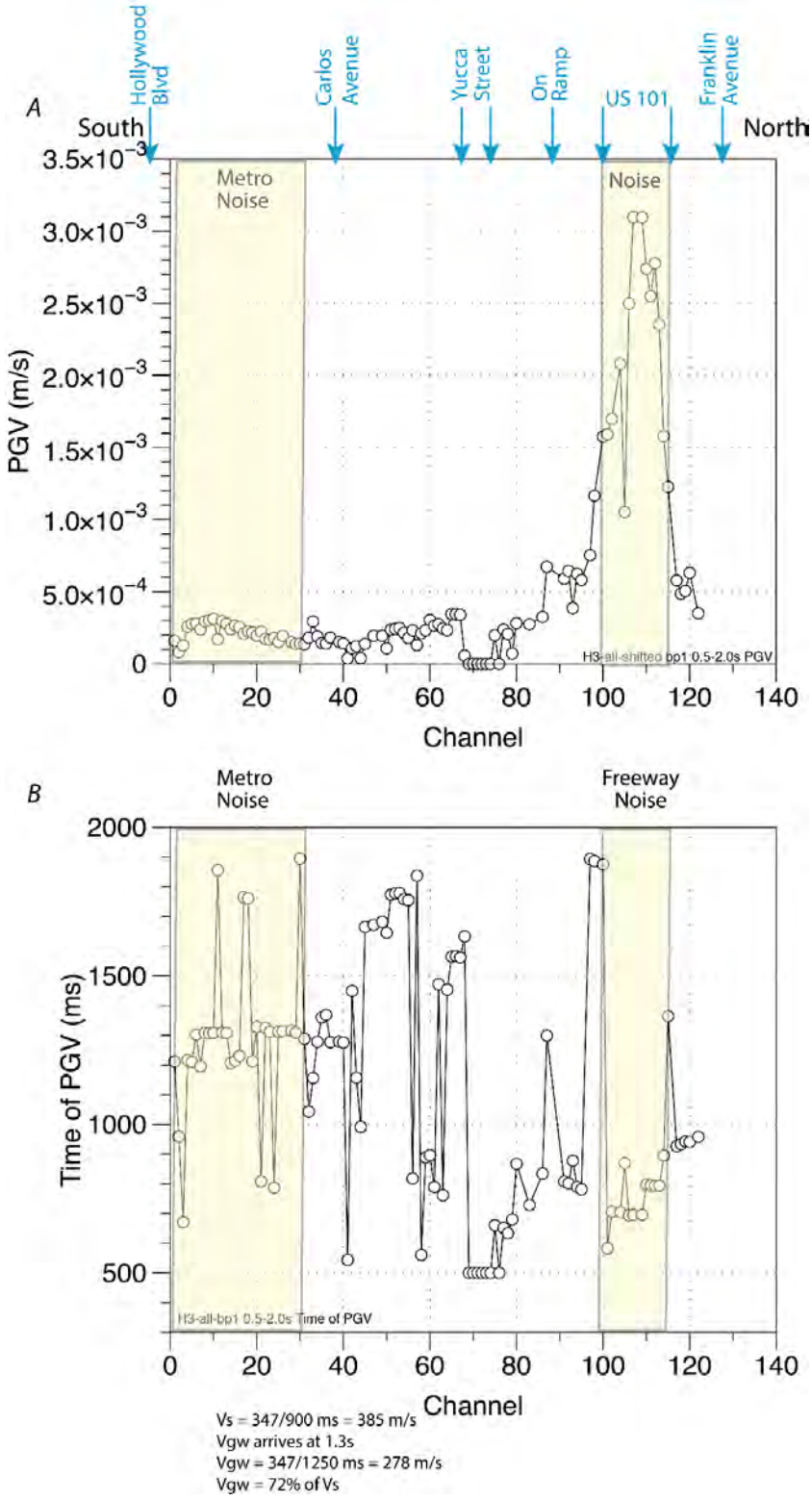

Figure 20. *A*, Plot of all peak ground velocities (PGV) of guided waves for each recording channel along part of Profile HW2 (guided-wave survey HGW3), showing locations of nearby cross streets. *B*, Travel times of PGV values shown in *A*. Extremely high PGV values centered near Highway 101 have travel times and velocities that are inconsistent with those expected for guided waves; thus, we suggest that very high PGV values observed for stations near Highway 101 result from freeway noise and not from guided waves; most other PGV values along Profile HW2 are much lower. Slightly higher values are seen on channels 1 to 30, and those higher values may

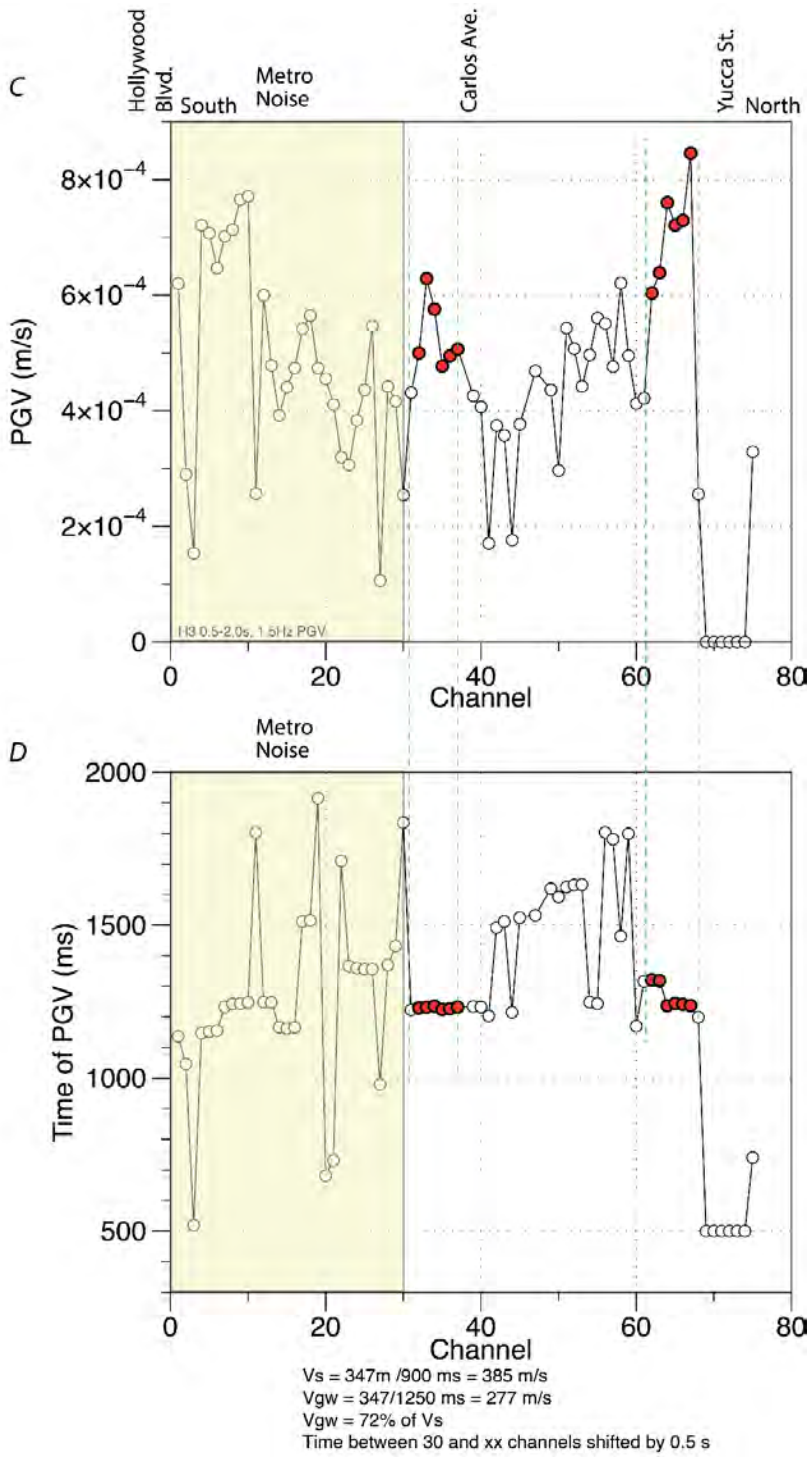

Figure 20 (cont.) result from cultural noises (cars or subway); however, travel times for slightly higher PGV values are generally in time frame expected for guided waves. C, Plot of PGV of guided waves along part of Profile HW2 (guided-wave survey HGW3) south of Yucca Street. High cultural noise is prevalent for channels 1 to 30, making it difficult to determine whether higher PGV values in that range result from guided waves. D, Travel times of PGV values shown in C. Relatively high PGV values (red dots) slightly south of Carlos Avenue and south of Yucca Street have travel times and propagation velocities that are consistent with expectations of guided waves; thus, we suggest possible faulting at those locations (see dashed green lines). Other abbreviations: m, meter(s); ms, millisecond(s); s, second(s).

rate of 0.5 ms. Cultural-noise levels were high along North Argyle Avenue at the time of data acquisition, and the resulting shot gathers were noisy (fig. 21). As a result, we evaluated V_S data that were derived from the surface-wave (Rayleigh wave) data using the MASW technique (fig. 22). Combining the tomographic V_P and the MASW V_S data, we evaluated V_P/V_S ratios and Poisson's ratios along Profile HW2 (figs. 23, 24, respectively).

Profile HW2 V_P Model

We used the data from the HRR3 survey to develop a V_P model (fig. 22) for Profile HW2. The V_P values range from 400 m/s near the surface in the south to about 3,300 m/s at about 70 m depth near the center of the profile. An abrupt change in shallow velocities (~400 m/s) is observed at Carlos Avenue, with higher velocities to the north at shallow depths and progressively thicker lower velocity materials southward toward Hollywood Boulevard. The abrupt change in shallow V_P at Carlos Avenue is similar to the change in V_P seen along Profile HW1 at the apparent Hollywood Fault (fig. 7). The abrupt change in V_P along both Profiles HW1 and HW2 occurs coincident with the zone of apparent high PGV values seen from guided waves. A similar change in V_P also is observed just south of Yucca Street, where PGV of guided waves is locally high. Thus, both guided waves and V_P are suggestive of near-surface faulting slightly south (10–25 m) of the center of Carlos Avenue and about 20 to 35 m south of the center of Yucca Street.

Profile HW2 V_S Model (from MAS$_R$W)

From Rayleigh waves generated during the HRR3 seismic survey, we a developed MASW-based V_S model (fig. 23) for Profile HW2. Our V_S model shows that V_S ranges from 200 m/s near the surface

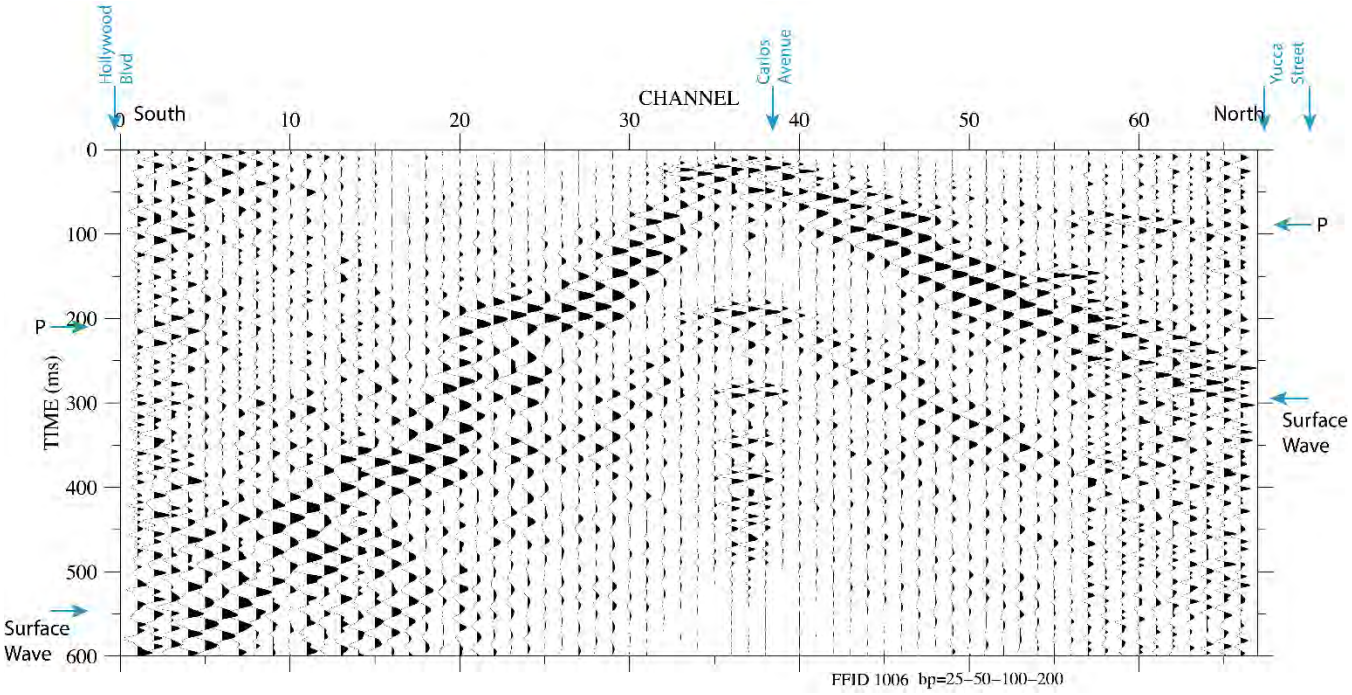

Figure 21. In-line P-wave shot gather along Profile HW2, south of Yucca Street. High cultural noise levels are particularly noticeable for channels 1 to 15. Multiples, owing to bouncing of seismic source (AWD), are prominent at travel times greater than 200 ms. Zone of asymmetric surface waves and refracted arrivals is present north and south of shot point, demonstrating large differences in structure to south versus to north. Locations of nearby streets are shown. Other abbreviations: m, meter(s); ms, millisecond(s); s, second(s).

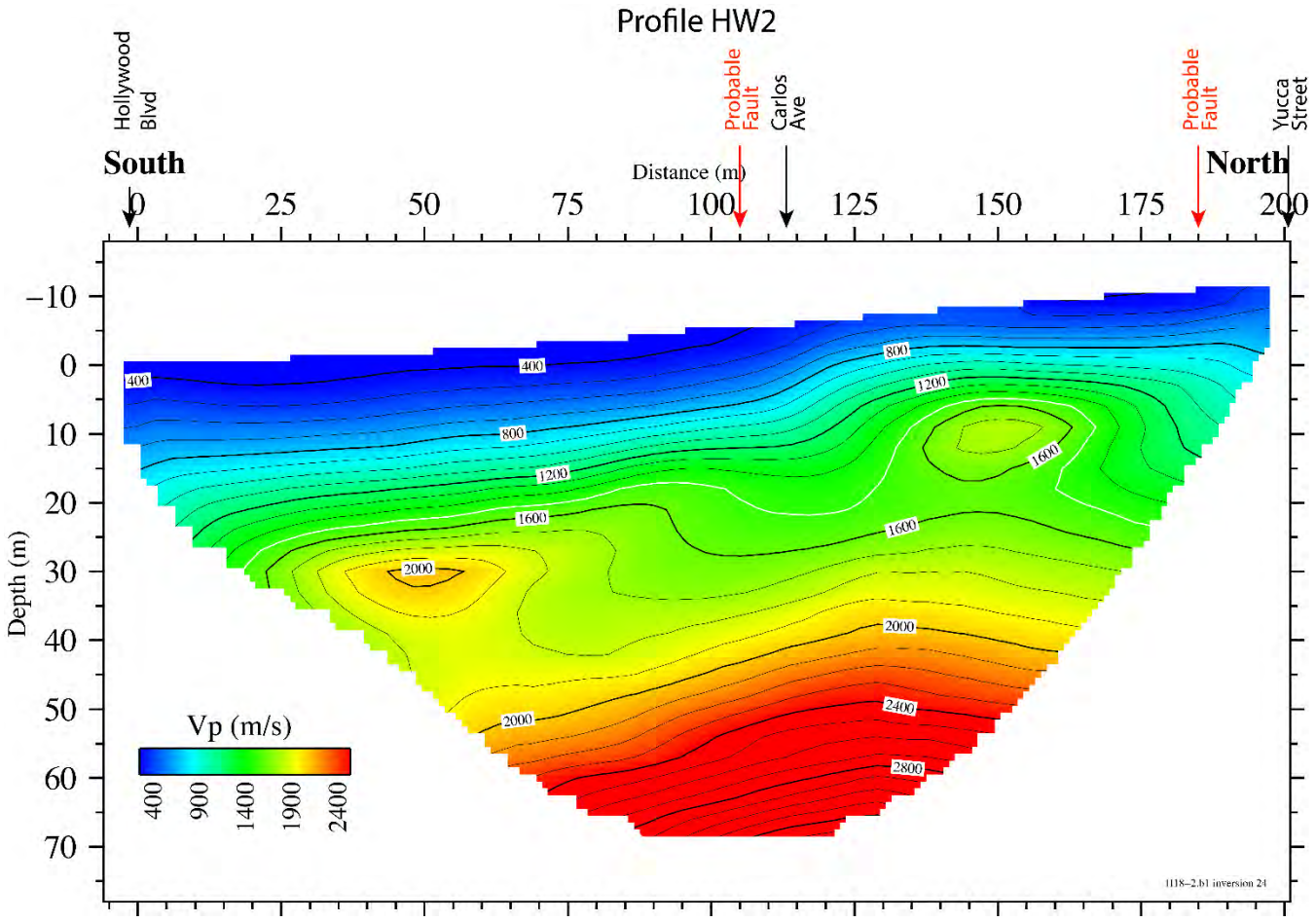

Figure 22. Tomographic P-wave velocity (V_P) model along Profile HW2, showing locations of cross streets. Prominent V_P anomalies are present along seismic profile, such as abrupt shallowing of 400-m/s velocity contour near Carlos Avenue. Similar change in velocity is observed at near-surface trace of Hollywood Fault along Profile HW1. This is also same location that relatively high PGV values are observed on guided-wave PGV plots (see fig. 20). We interpret second change in shallow-depth V_P south of Yucca Street, also consistent with guided-wave PGV values, to infer faulting. Other abbreviations: m, meter(s); s, second(s).

on the southern profile to about 675 m/s at about 30-m depth south of Carlos Avenue. From the south end of Profile HW2 (at Hollywood Boulevard) to approximately Carlos Avenue, a 7- to 10-m-thick zone of low-V_S (<300 m/s) materials is present in the near surface; this layer pinches out at Carlos Avenue in a manner similar to that seen in the tomographic V_P model (fig. 7). Between that 7- to 10-m-thick layer and the base of the model, V_S is high relative to the north end of Profile HW2. A major lateral transition in V_S is observed at all depths of the model, suggesting that a major change in structure is present, likely caused by faulting. Our V_S model also shows that a pronounced, southward-dipping, low-velocity zone is present south of Yucca Street, as was also inferred on the V_P model. This southward-dipping velocity structure may infer a southward-dipping fault south of Yucca Street. Both the V_P and V_S models suggest that an isolated zone of relatively high velocities is present near the surface between meters 130 and 160.

Profile HW2 V_P/V_S Model (V_P Tomography and V_S MASRW)

Using V_P from the tomography model (fig. 22) and V_S from the MASW-based model (fig. 23), we developed a V_P/V_S–ratio model (fig. 24) for Profile HW2. Our model suggests that V_P/V_S ratios range from about 1.5 near the surface south of Carlos Avenue to about 4.8 below 10 m depth between Carlos

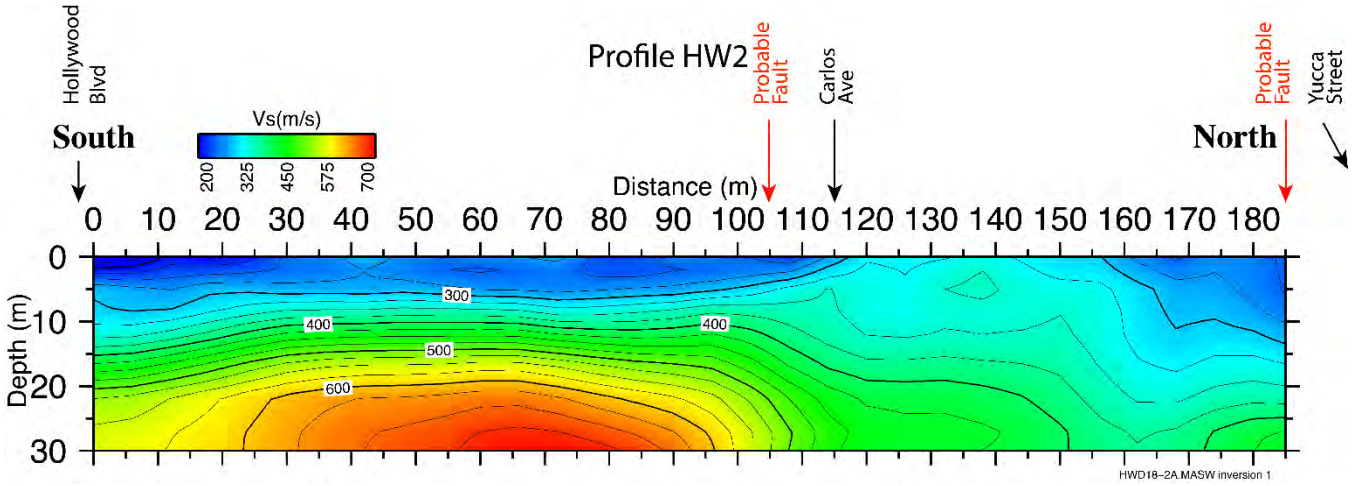

Figure 23. S-wave velocity (V_S) model along Profile HW2, inferred from Rayleigh waves using the multichannel analysis of surface waves (MASW) method. V_S model shows abrupt increase in V_S north of Carlos Avenue, with shallow structure similar to that modeled for V_P model. Higher velocities (>400 m/s) are abruptly terminated near Carlos Avenue, suggesting slightly northwestward dip of probable fault. Change in V_S also is observed south of Yucca Street, with prominent near-vertical low-velocity zone, inferring possible southwestward dip of fault there. Locations of nearby streets are shown. Other abbreviations: m, meter(s); s, second(s).

Avenue and Yucca Street. The zone of highest V_P/V_S ratios is relatively wide near the top and decreases in width with depth, which suggests that two opposing faults join at depth. Thus, on the basis of our V_P, V_S, and V_P/V_S models, we suggest a northward-dipping fault near Carlos Avenue and a southward-dipping fault south of Yucca Street.

Profile HW2 Poisson's Ratio Model (V_P Tomography and V_S MAS$_R$W)

Using the same V_P and V_S models as used to develop our V_P/V_S–ratio model, we developed a Poisson's ratio model for Profile HW2 (fig. 25). The Poisson's ratio model infers a similar structure as that of the V_P/V_S–ratio model. Generally, subsurface materials in the upper about 20 m along Profile HW2 differ markedly from south to north, with the major change occurring at Carlos Avenue. This lateral variation in Poisson's ratio values suggests a significant change in shallow-crustal properties that are likely related to groundwater saturation. Because faults usually act as groundwater barriers, this pronounced lateral change in Poisson's ratio is consistent with the presence of a fault near Carlos Avenue. The highest Poisson's ratio values along our model are confined to a zone between Carlos Avenue and Yucca Street, which would be consistent with bounding faults near Carlos Avenue and slightly south of Yucca Street.

Summary of Seismic Indicators of Faulting along Profile HW2

We evaluated five seismic models along Profile HW2, including (1) PGV of guided waves from two source locations, (2) tomographic V_P, (3) MASW V_S, (4) hybrid tomography/MAS$_R$W V_P/V_S ratios, and (5) hybrid tomography/MAS$_R$W Poisson's ratios. All of these models show prominent changes in shallow-depth structure near Carlos Avenue and slightly south of Yucca Street that are consistent with shallow faulting in those locations. We interpret these images as indicating a shallow-depth, northward-dipping fault near Carlos Avenue and a shallow-depth, southward-dipping fault south of Yucca Street, with both faults merging in the shallow subsurface.

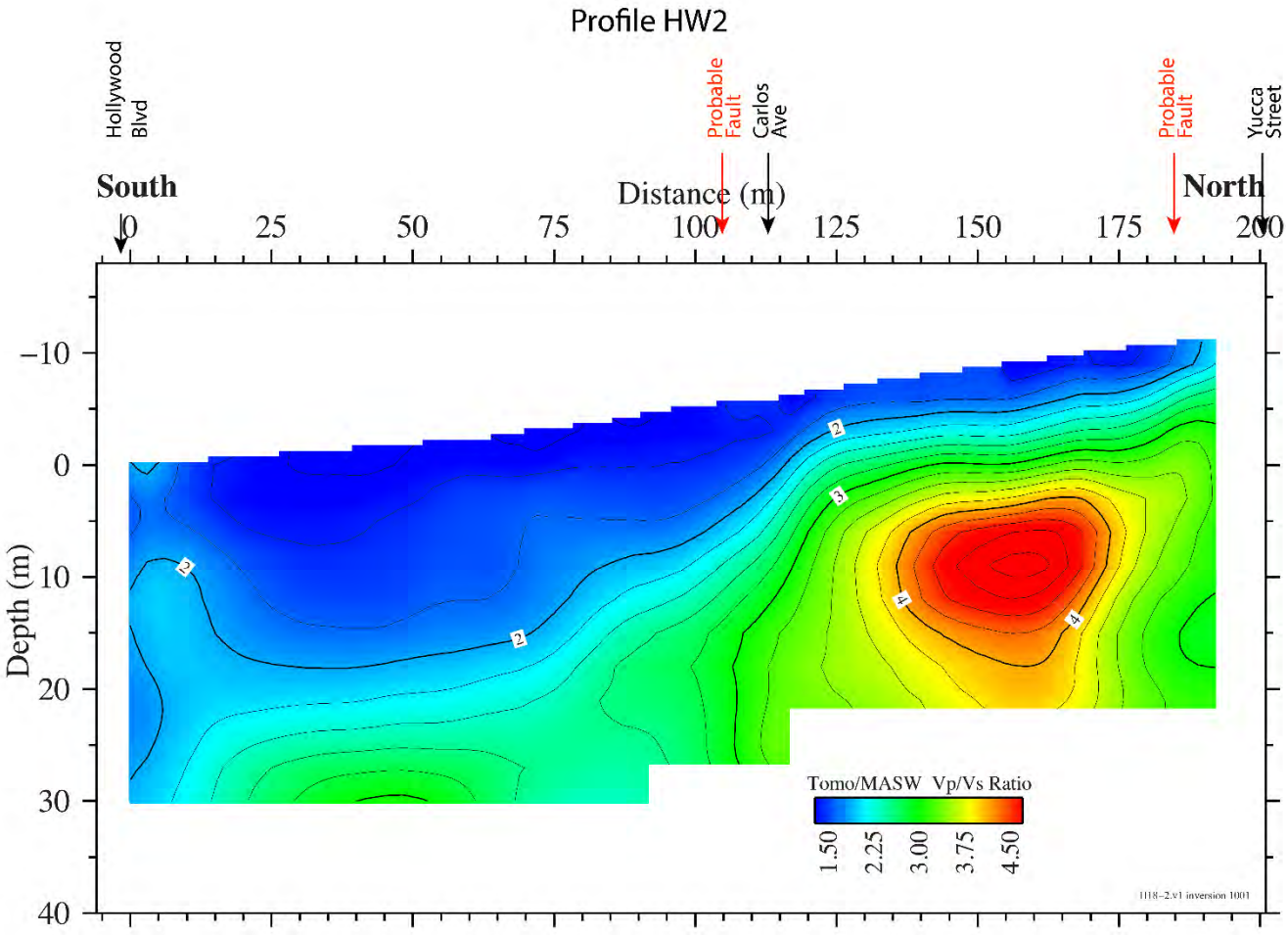

Figure 24. V_P/V_S ratio model along Profile HW2, derived from combination of our V_P tomography model and our MASRW V_S model. Shallow-depth, abrupt changes in V_P/V_S ratios are present in vicinity of Carlos Avenue and south of Yucca Street. Prominent V_P/V_S-ratio high is present at slightly greater depths between two abrupt changes in V_P/V_S ratios. This structure can be interpreted as showing two opposing fault traces. Locations of nearby streets are shown. Abbreviation: m, meter(s).

Summary of Observations, Hollywood Fault

We evaluated 13 seismic models and data combinations along Profile HW1 at the First Presbyterian Church of Hollywood parking lot (fig. 3). All of those data are consistent with near-surface faulting near meter 106 of Profile HW1, slightly south of Carlos Avenue. On the basis of the combined seismic data, we interpret the fault to slightly splay near the surface, having both northward and southward dips at shallow depths but a northward dip at depth. On the basis of the location of the fault identified in core borings and CPT transects at the Hollywood Courthouse building and our observed location along Profile HW1, we suggest that the fault strikes about N. 87° E. and has variable dips in the shallow subsurface. However, on the basis of the unmigrated reflection images, we suggest that the fault dips slightly northward at depth.

We evaluated five seismic models and data combinations along Profile HW2 along North Argyle Avenue in Hollywood. All of those data are consistent with, but not definitive of, near-surface faulting slightly south of Carlos Avenue and south of Yucca Street. Furthermore, additional fault traces may be

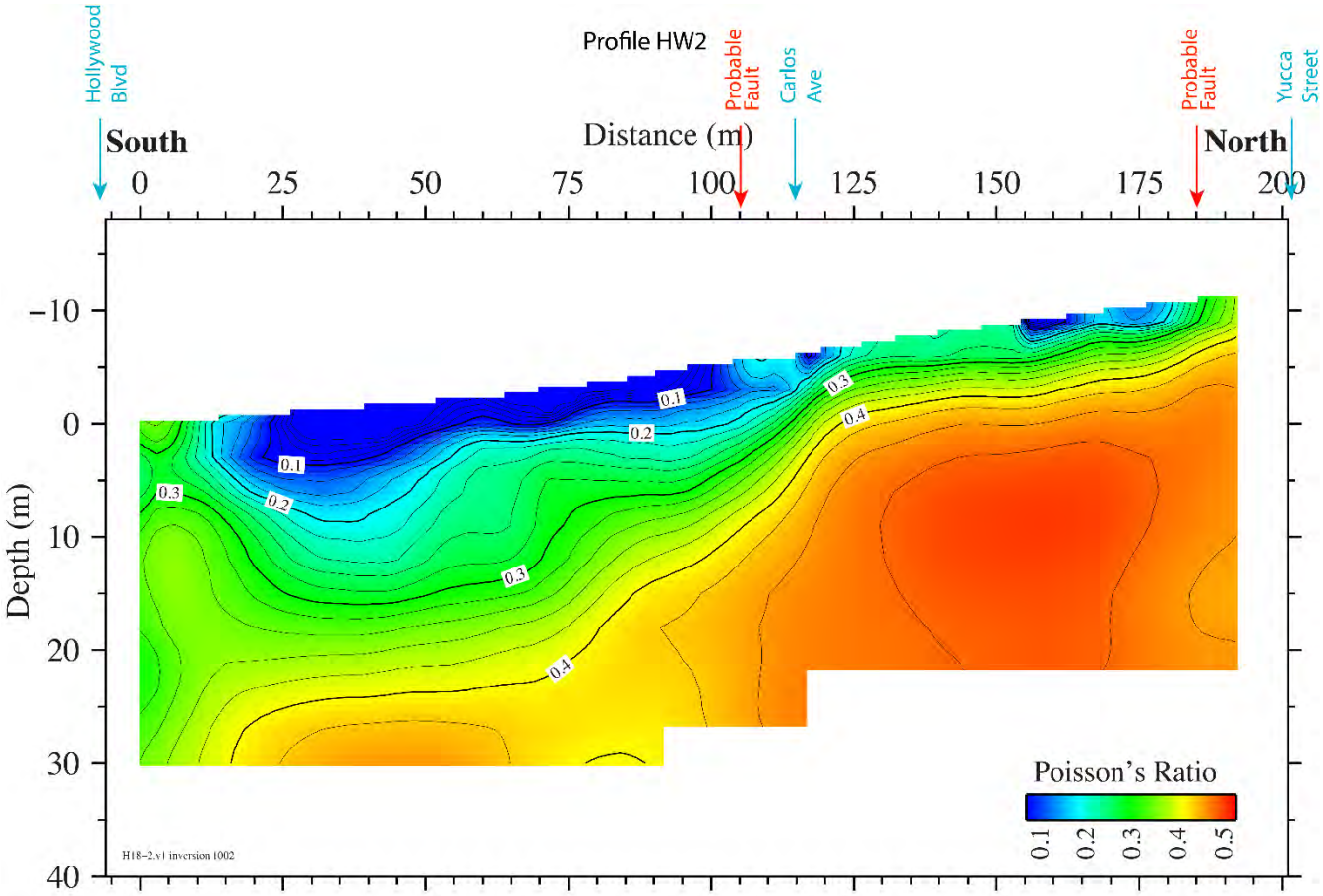

Figure 25. Poisson's ratio model along Profile HW1, derived from combination of our V_P tomography model and our MASRW V_S model. Shallow-depth, abrupt changes in Poisson's ratios are observed in vicinity of Carlos Avenue and south of Yucca Street. Prominent Poisson's-ratio high is present at slightly greater depths between two abrupt changes in near-surface Poisson's ratios, which we interpret as a highly saturated zone between two faults. Locations of nearby streets are shown. Abbreviation: m, meter(s).

present along Profile HW2, but the high levels of cultural noise in our data make it difficult to infer faulting elsewhere along North Argyle Avenue. On the basis of the fault locations along Profiles HW1 and HW2 inferred from our data, we suggest that this strand of the Hollywood Fault strikes almost due east-west between the core boring/CPT transect at the Hollywood Courthouse and our seismic profile along North Argyle Avenue. Although traces of the fault may have variable dips in the shallow subsurface, we suggest that the overall dip is near vertical, with a slightly northward dip at depth.

Santa Monica Fault Data Acquisition (Beverly Hills)

On May 26, 2018, and on June 6, 2018, we conducted guided-wave seismic surveys across the suspected near-surface trace of the Santa Monica Fault in Beverly Hills, Calif. The recording array for both seismic surveys was located on the east side of Lasky Drive, between Moreno Drive and Santa Monica Boulevard (fig. 26). We refer to this profile as Profile BH1, and we refer to the two individual surveys as BHGW1 and BHGW2.

Survey BHGW1 was about 300 m long and consisted of approximately 149 recording sites, but six of the sites were not used because they would have blocked driveways. The data from survey BHGW1 were recorded on 4.5-Hz horizontal-component sensors, spaced at 2-m intervals, but data were not recorded at 20 sites owing to instrumental failures. The sampling rate was 2 ms. The seismic source

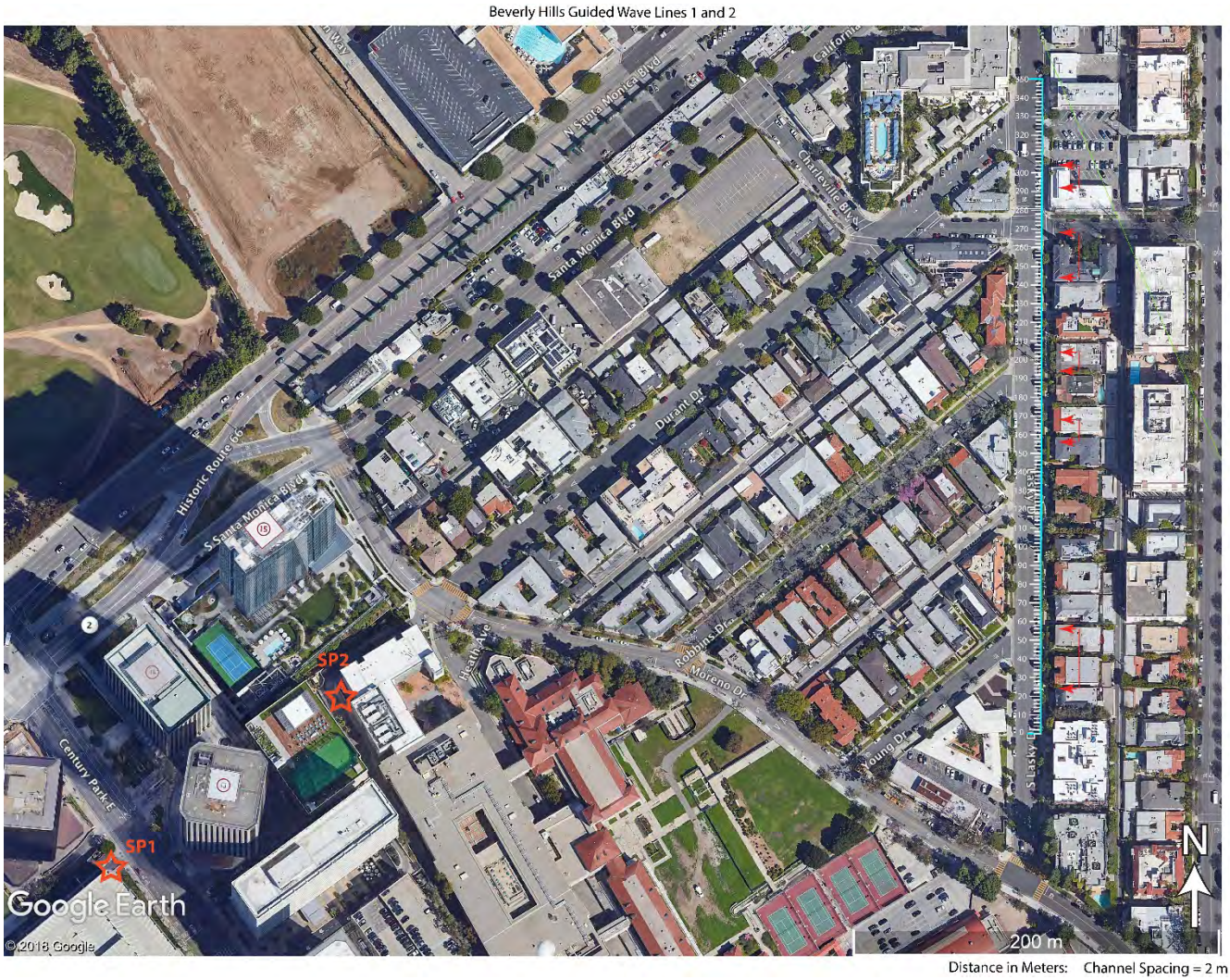

Figure 26. Google Earth image of Santa Monica Fault in our study area in Beverly Hills, showing locations of seismic surveys (BHGW1, BHGW2) recorded along Profile BH1 (cyan line). Scale (in meters [m]) is included along Profile BH1. Seismic sources were generated at SP1 and SP2 (red stars) at the near-surface trace of Santa Monica Fault, as inferred from geologic mapping. Recording arrays for BHGW1 and BHGW2 surveys were located in same place, except that BHGW2 survey extended farther north by about 50 m. Red arrows show zones where high PGV values (that have travel times consistent with guided waves) were recorded.

(227-kg AWD) used to generate guided waves was located approximately 30 m southwest of Century Park East and about 100 m southeast of Santa Monica Blvd, within an alley northwest of a parking garage. The first AWD shot started on May 26, 2018, at 21:42:05 (local time; 04:42:05 UTC), and the last shot was completed at 22:24:46 (local time; 05:24:46 UTC) on the same day. We stacked a total of 198 individual shots to form a guided-wave shot gather.

We decided to acquire a second seismic guided-wave survey (BHGW2) along Laskey Drive on June 6, 2018, when we discovered that the expected fault crossing was at the approximate north end of the BHGW1 survey, near the intersection of Lasky Drive and Charleville Boulevard. The recording stations for the BHGW2 survey were in the same locations as that of the BHGW1 survey, but the length (350 m) of the recording array for BHGW2 was slightly longer (fig. 26). Profile BH2 consisted of 174 recording stations, but recorders were not deployed at 13 stations because they would have blocked driveways. We used the same sensors (4.5-Hz), station spacing (2 m), and sampling rate (2 ms) for the

BHGW2 survey as was used for the BHGW1 survey. However, the seismic source (SP2) for the BHGW2 survey was located at SP2, about 80 m southwest of Heath Avenue and about 130 m southeast of Santa Monica Boulevard (fig. 26). The first shot started on June 6, 2018, at 22:05:42:36 (local time; 05:42:36 UTC), and the last shot was completed at 23:01:37 (local time; 06:01:37 UTC). A total of about 198 AWD shots were generated. Owing to instrumental failures, we did not obtain data from 19 of the 174 seismic recorders.

Santa Monica Fault Data Analysis

The seismic sources for the BHGW1 seismic survey were located about 500 and 647 m southwest of the southernmost and northernmost ends of Profile BH1, respectively (fig. 27). We chose this site (SP1) to generate seismic sources because it was the location of a previous coring and CPT transect, in which an active trace of the Santa Monica Fault was identified. Because the source was not centered with respect to the recording array, a difference in travel time from the south end to the north end of the array was observed. To evaluate the PGV of the guided waves within the same time window, the "moveout" of the travel time was removed by shifting the time of the more distant arrivals on the north end of the profile. Thus, the actual travel time of the guided waves on the north end of the recording array was greater by about 500 ms than what is shown in figure 27.

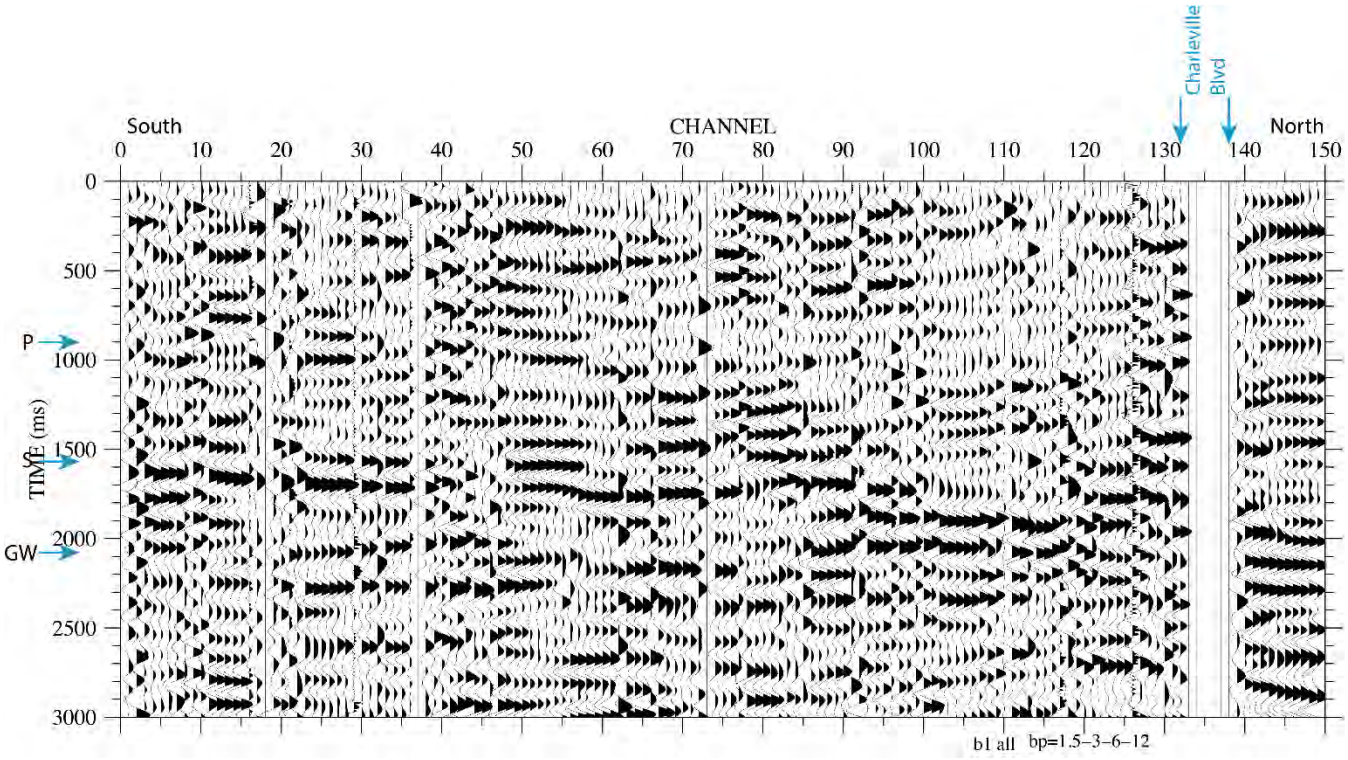

Figure 27. Stacked guided-wave shot gather for BHGW1 seismic survey. Source is located at SP1; recording array is located along Profile BH1 (distance between source and recording array ranges from about 500 to about 650 m). Long propagation distance and high level of cultural noise resulted in poor signal-to-noise ratios. P waves (P), S waves (S), and guided waves (GW) are inferred on shot gather. Data were band-pass filtered between 1.5 and 12 Hz. Location of Charleville Boulevard is shown. Other abbreviation: ms, millisecond(s).

Guided-Wave Data Analysis for Profile BH1

The signal-to-noise ratio of the data acquired during the BHGW1 seismic survey was low (fig. 27) owing to excessively high cultural-noise levels during the ~21:00- to ~22:00-hour local time frame on May 26, 2018, which was a Saturday evening. However, even with the low signal-to-noise ratios, we were able to evaluate PGV of guided waves (fig. 28) within the time frame (>1.5 to 3 s) expected for shear-wave and guided-wave arrivals. On the basis of travel time and amplitude, we infer the presence of low-velocity guided waves south and north of Charleville Boulevard and possibly near the south end of Profile BH1. The observed high values of guided-wave PGV (fig. 28*A*) correlate with the expected guided-wave travel times (fig. 28*B*). Our data show that the highest PGV values arrived at the recording array at about 2,500 ms (2.5 s; ~0.5 s added to arrivals on the north end of the profile shown in fig. 28*B*), and because the source was approximately 650 m from apparent fault zone, this suggests that the guided waves traveled at about 250 m/s. The earliest shear waves arrived at the recording array at about 1,500 ms (1.5 s), suggesting an average V_S of about 330 m/s. These velocities suggest that the guided waves travel at about 75 percent of the velocity of the shear wave. Along Profile BH1, the most prominent high values of PGV are observed between channels 60 and 150 (between meters 118 and 298) of the recording array, which extends from slightly south to slightly north of Charleville Boulevard (fig. 28).

Beverly Hills Profile BH2 Guided-Waves

The signal-to-noise ratios of the data from the BHGW2 seismic survey (fig. 29) were higher than those of the data recorded for the BHGW1 survey. As a result, the shear-wave and guided-wave arrivals are more apparent on the BHGW2 data. The higher signal-to-noise ratios may have resulted from stronger signals because the seismic source (SP2) was closer to the recording array, but the higher ratios may also have resulted from lower cultural-noise levels present later in the evening (~22:00 to ~23:00 local time). Lower noise levels also were likely on a Wednesday evening (June 6, 2018) than on a Saturday evening.

From the data obtained during the BHGW2 seismic survey, we evaluated PGV values of guided waves from the time of the shear-wave arrival (~1 s) to about 3.2 s (includes a 0.5-s time shift on the north end of the profile; see fig. 30). Our PGV values are averaged over three consecutive arrivals to limit large variations from a single arrival. On the basis of travel time and amplitude, the low-velocity guided waves appear easy to identify. High-PGV values (fig. 30*A*) correlate with the expected guided-wave travel times (and velocities) along Profile BH2 (fig. 30*B*). Our data show that the highest PGV values arrived at the recording array at 2,000 to 2,500 ms (2.0–2.5 s; includes the time shift), and, using distance from the source (368–510 m) to the fault traces, we found that the guided waves traveled at about 185 to 200 m/s. These guided-wave velocities are lower than those estimated for the BHGW1 survey because of the greater distance and deeper propagation depth of guided waves between SP1 and the BHGW1 recording array. The earliest shear wave for the BHGW2 survey arrived at the recording array at about 1,500 to 2,000 ms (1.5–2.0 s), suggesting an average V_S of about 245 to 255 m/s. This suggests that the guided wave travels at about 75 to 78 percent of the velocity of the shear wave.

Along Profile BH2, the most prominent late-arriving, high-PGV values are seen at stations (channels) 120 to 135 (meters 238–268) and 145 to 152 (meters 288–302) of the recording array; these stations were located in the vicinity of Charleville Boulevard, suggesting that prominent fault traces are present in that area. However, late-arriving, locally high PGV values also were observed near stations 11 to 28, 78 to 82, and 95 to 102. The high-PGV values observed at these stations also coincide with late arrivals that are consistent with guided waves. Similarly PGV-value zones also were seen on the BHGW1 survey, which were contaminated with cultural noise. Because of the consistent travel-time delays and high amplitudes, we suggest that each of the high-PGV values listed above likely are fault related. Because of the prominent PGV peaks and observed travel times (velocities) near Charleville Boulevard, we suggest that those probable faults are the ones most directly connected to the fault trace at

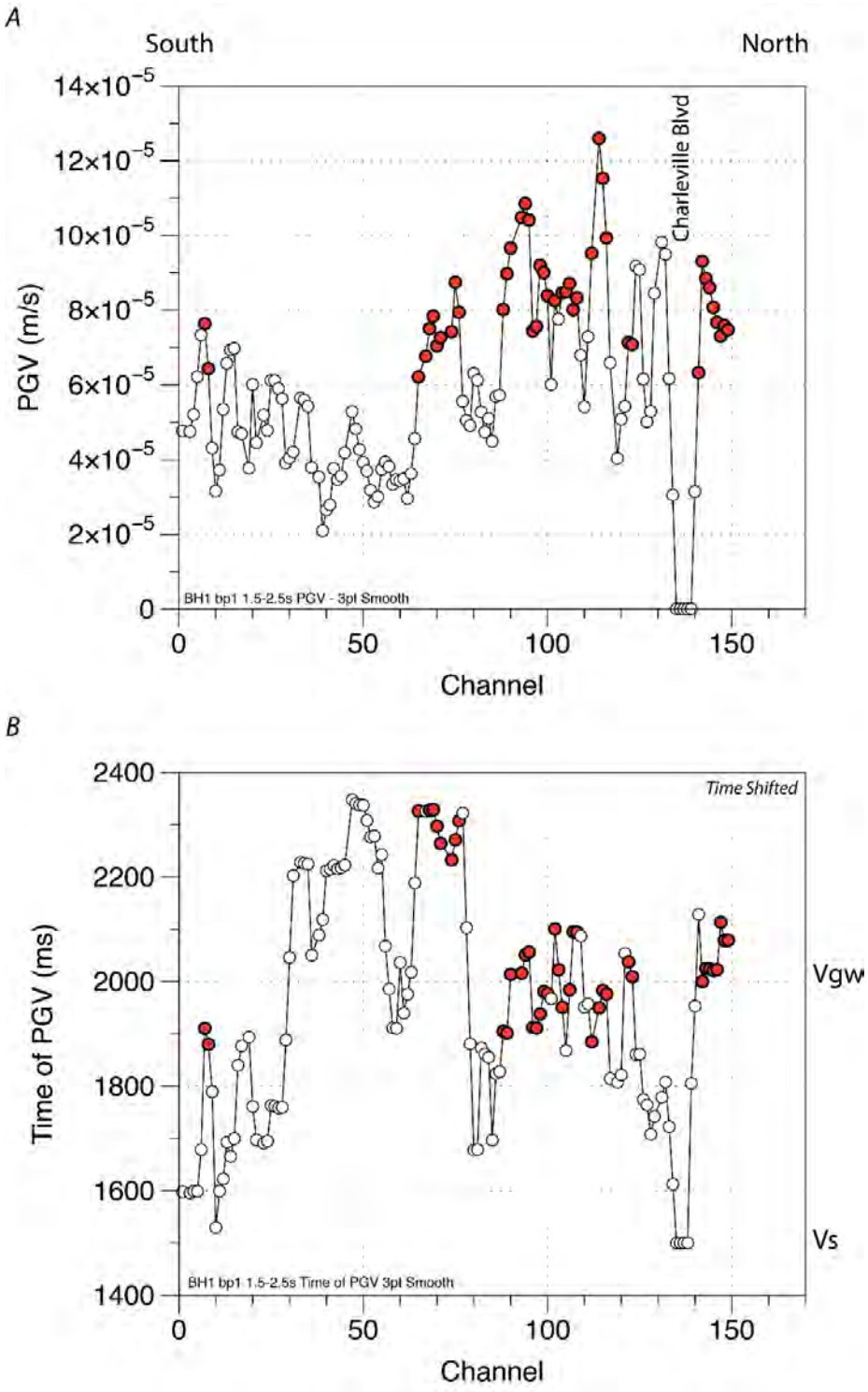

Figure 28. *A*, Plot of peak ground velocity (PGV) of guided waves for each recording channel along BHGW1 survey. Highest PGV values (red dots) were concentrated on north end of recording array, both north and south of Charleville Boulevard; indications of relatively high values also are present at several locations along Lasky Drive. *B*, Plot of time of arrival of corresponding PGV values shown in *A*. Note that highest PGV values coincide with delayed phases that arrive at about 1.9 to 2.1 seconds (s) or more (after 0.5-s time shift applied). Arrival times have been shifted downward on north end of profile by about 0.5 s relative to south end of profile. Owing to low signal-to-noise ratios for BHGW1 survey, uncertainty is high in possible fault traces. Location of Charleville Boulevard is shown. Other abbreviations: m, meter(s); ms, millisecond(s); s, second(s).

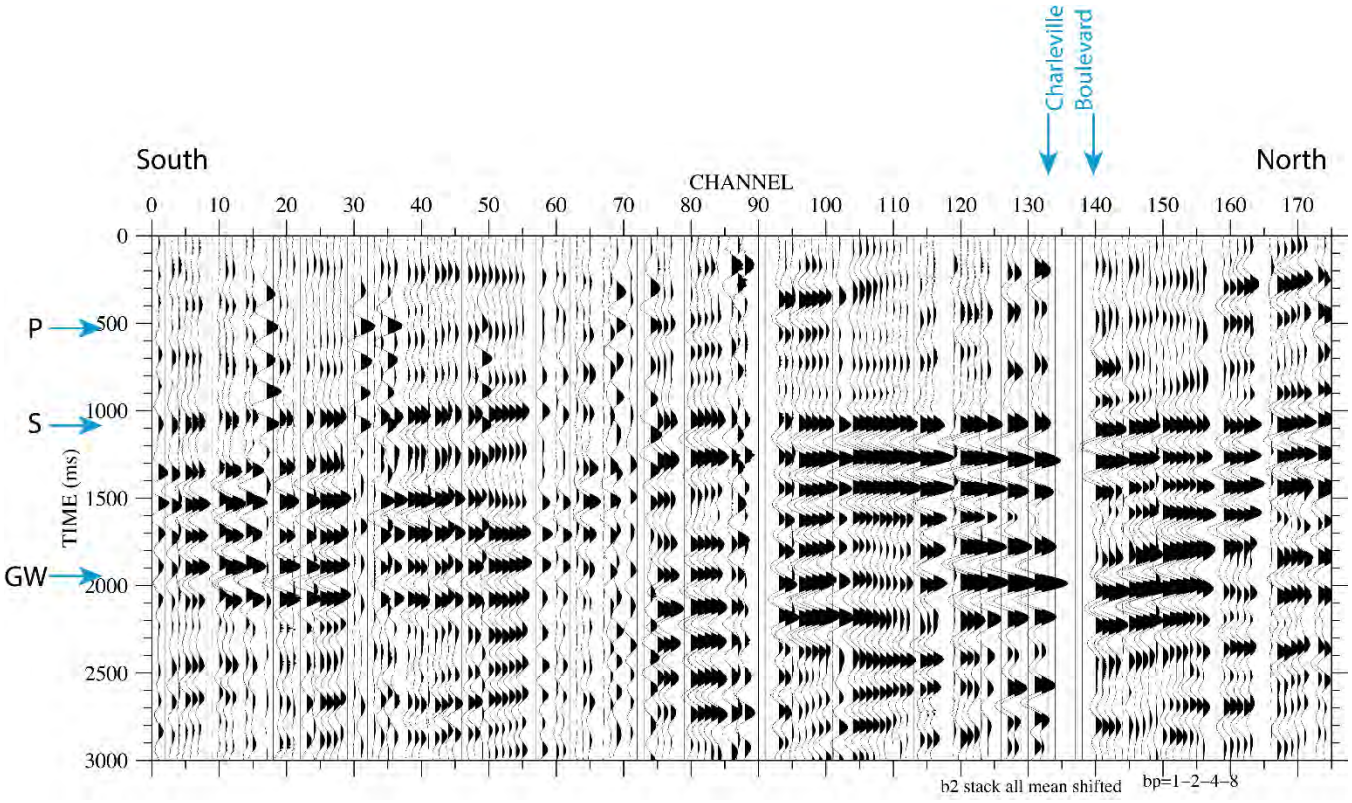

Figure 29. Stacked guided-wave shot gather for Profile BH2. Source is located at SP2; recording array is located along Profile BH1 (distance between source and recording array ranges from about 370 to about 510 m). Shorter propagation distance and lower cultural-noise levels resulted in higher signal-to-noise ratios than recorded for BHGW1 survey. P waves (P), S waves (S), and guided waves (GW) are inferred on shot gather. Data were band-pass filtered between 1 and 8 Hz. Location of Charleville Boulevard is shown. Other abbreviation: ms, millisecond(s).

the seismic source (SP2). The probable fault traces near Charleville Boulevard also are likely to be near-surface traces. Because multiple high-PGV zones are present along the BHGW2 survey, we suggest that the near-surface Santa Monica Fault is distributed along several traces along Lasky Drive.

Summary of Observations, Santa Monica Fault, Beverly Hills

We acquired only guided-wave data along Lasky Drive in Beverly Hills because we did not have the requisite permission to conduct in-line, active-source surveys. Additionally, we had little direct knowledge of the location of traces of the Santa Monica Fault where we could place our seismic sources. As a result, we conducted two guided-wave seismic surveys along Lasky Drive. Before conducting the first survey (BHGW1), we did not realize that one of the main traces of the Santa Monica Fault may have been located near the intersection of Charleville Boulevard and Lasky Drive, which was the north end of the BHGW1 survey. Upon learning of this possible location of the fault trace, we chose to conduct a second survey (BHGW2) that extended northward of the possible fault trace.

The signal-to-noise ratios of data from the BHGW1 survey were low, but the data from that survey appear to be consistent with probable faulting north and south of Charleville Boulevard. In addition, the data indicate that additional distributed faulting may be present along Profile BH1, particularly south of Charleville Boulevard. However, because of the low signal-to-noise ratios of the data, we have lower confidence in the data from the BHGW1 survey.

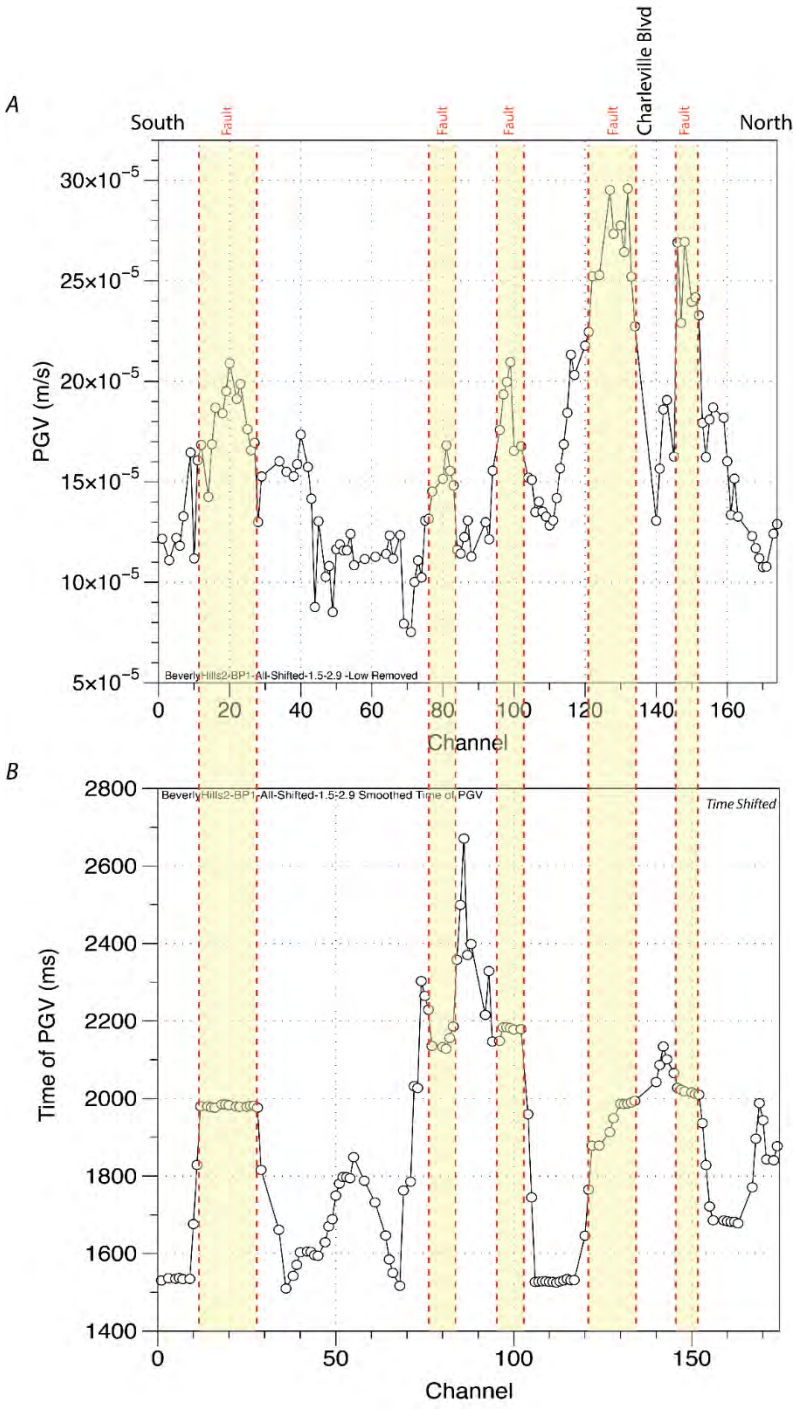

Figure 30. *A*, Plot of peak ground velocity (PGV) of guided waves for recording channels along BHGW2 survey. Because data were not recorded for some stations and because some sensors were not leveled when deployed, we opted to average each PGV value relative to the two closest PGV values to obtain a more stable result. High-PGV values (yellow shading) were concentrated along several locations along Lasky Drive; highest PGV values are near Charleville Boulevard. *B*, Plot of time of arrival of corresponding PGV values shown in *A*. Arrival times have been shifted downward on north end of profile by about 0.5 second (s) relative to south end of profile. Highest PGV values coincide with delayed phases that arrive at about 2 s or more (shifted time), consistent with guided waves, suggesting prominent faulting near Charleville Boulevard, but additional faulting appears to be present at areas along the profile (yellow shading). Location of Charleville Boulevard is shown. Other abbreviations: m, meter(s); ms, millisecond(s); s, second(s).

Data from the BHGW2 survey contained much higher signal-to-noise ratios, and the BHGW2 data also are indicative of faulting near the intersection of Charleville Boulevard and Lasky Drive. In addition, the BHGW2 data also are consistent with the presence of as many as three other fault traces along Lasky Drive. Importantly, all five of these high-PGV zones can be inferred on both the BHGW1 and BHGW2 data (figs. 28, 30). Thus, we suggest that distributed shallow-depth faulting likely is present at several locations along Lasky Drive.

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Exhibit C

Wilson Geosciences report, which attaches the May 8, 2020 new USGS report and data and concludes that the Hollywood Fault as a continuous unit is active.

WILSON GEOSCIENCES INC.

Engineering and Environmental Geology

May 26, 2020

Robert P. Silverstein, Esq.
The Silverstein Law Firm, APC
215 N. Marengo Avenue, 3rd Floor
Pasadena, CA 91101

SUBJECT: Review and Analysis of the Hollywood Center (HC) Draft Environmental Impact Report (DEIR) and Appended/Referenced Documents Related to Active Faulting Associated with the Alquist-Priolo Earthquake Fault Zone (APEFZ) within the Hollywood 7.5-Minute Topographic Quadrangle; DEIR Dated April 16, 2020 by Environmental Sciences Associates, Inc. (ESA)

Dear Mr. Silverstein:

INTRODUCTION, QUALIFICATIONS AND REPORT ORGANIZATION

This firm was retained by your office to review the Hollywood Center (HC) Draft Environmental Impact Report (DEIR) and appended/referenced documents related to active faulting associated with the Alquist-Priolo Earthquake Fault Zone (APEFZ) within the Hollywood 7.5-Minute Topographic Quadrangle. The DEIR, dated April 16, 2020, was prepared by Environmental Sciences Associates, Inc. (ESA). Our review focused on the IV-D Geology and Soils section, and those associated appendices and reports utilized to determine the activity and/or location of faults within or adjacent to the proposed HC development area. In general, the previous studies for Millennium Hollywood (MH) are assumed to be included under the HC reference. Listed under the subsection titles used in this letter, the other primary referenced documents reviewed are a part of the DEIR referenced materials and can be found within the DEIR (City of Los Angeles, 2020; https://planning.lacity.org/development-services/eir/hollywood-center-project-1), or by an internet search. The primary references within three categories include:

The Draft Environmental Impact Report (DEIR) for the Hollywood Center Project (2020)

1) DEIR Appendix G-1 - 2015 Fault Activity Investigation (which, as made available by the City to the public during the majority of the public comment period, contained substantial amounts of unreadable text and numbers on all of the Plates and Figures);
2) Appendix G-2 – Surface Fault Rupture Hazard Evaluation Report;
3) Appendix G-3 – Geotechnical Investigation;

California Geological Survey Reports

4) California Geological Survey (CGS), 2018, Revised Special Publication 42, Earthquake Fault Zones, A Guide for Government Agencies, Property Owners/Developers, and Geoscience Practitioners for Assessing Fault Rupture Hazards in California, Revised 2018;
5) California Geological Survey, 2018a, Earthquake Zones of Required Investigation Maps (EZRIMs), http://gmw.conservation.ca.gov/shp/EZRIM/Maps/);

6) California Geological Survey, 2014, Fault Evaluation Report FER 253 Supplement No. 1, The Hollywood Fault in the Hollywood 7.5' Quadrangle, Los Angeles County, California by Hernandez, J., November 5, 2014;

Previous Hollywood Center Project Site and Nearby Fault Evaluation Reports

7) Surface Fault Rupture Evaluation Report, Central Hollywood Tract, No. 2, Lots 1, 2, 3 and 5, 1718 Vine Street, Los Angeles, California, July 28, 2016 by Group Delta Consultants, Inc. (GDC);

8) Fault Investigation Report, Tract No. 26206, Lot 1 [APN 5546-003-015 & 016] and Hollywood Tract, Block 22, Lots 4.2, 5, 6, and 7 and Lots 9, 10, and 11 [APN 5546-003-003, -004, -009, -010, 019, -020] 6305 Yucca Street Los Angeles, California by Group Delta Consultants, Inc. (GDC);

9) Fault Activity Investigation 6230 Yucca Street SW Corner of Yucca Street and Argyle Avenue Hollywood Area, City of Los Angeles, California GDC Project No. LA-1161A by Group Delta Consultants, Inc. (GDC);

10) Catchings, R. D., Hernandez, J., Goldman, M. R., Chan, J. H., Sickler, R. R., Olson, B., and Criley, C. J., May 2020, 2018 U.S. Geological Survey–California Geological Survey Fault-imaging Surveys across the Hollywood and Santa Monica Faults, Los Angeles County, California: U.S. Geological Survey Open-File Report 2020–1049, 42 p., https://doi.org/10.3133/ofr20201049 (**Exhibit C**); and,

11) Ninyo and Moore, 2015, Supplemental Fault Rupture Hazard Evaluation, Hollywood Courthouse, Los Angeles, California, Project No. 402132007, June 15, 2015 (**Exhibit D**).

The undersigned has been a licensed Professional Geologist and Certified Engineering Geologist in the State of California since 1974. His resume is attached as **Exhibit A**.

This letter report includes: 1) a brief description of the proposed project as we understand it from the April 2020 DEIR; 2) a statement of the purpose of this report; 3) a discussion/evaluation of, and comments on, the DEIR as related to Project Site fault rupture potential, which is a specific issue called out in the CEQA Appendix G Guidelines for environmental impact studies; and 4) a summary and conclusions. The report **Figures** (see **Exhibit B**), a 2020 United States Geological Survey (USGS) technical report (**Exhibit C**), and a 2015 Ninyo & Moore report (**Exhibit D**) are attached. A list of **Exhibit B** figures is provided after the **References Cited** and **Figures 1** through **5** are noted in this report in bold text (e.g., **Figure 1**).

HOLLYWOOD CENTER PROJECT DESCRIPTION

The Hollywood Center Project is a proposed mixed-use development on an approximately 4.46-acre site, generally bounded by Yucca Street on the north, Ivar Avenue on the west, Argyle Avenue on the east, adjacent development and Hollywood Boulevard on the south, and bifurcated by Vine Street (see DEIR Section II, Figure II-5). The portion of the Project Site located between Ivar Avenue and Vine Street is identified as the "West Site", and the portion located between Vine Street and Argyle Avenue is identified as the "East Site". The Project Site

would be redeveloped with up to 1,005 residential units and up to 30,176 square feet of commercial uses within four new mixed-use buildings (West Building, East Building, West Senior Building, East Senior Building) with proposed heights of 35, 46, 11, and 11 stories, respectively. Overall, the Project would contain up to 1,287,150 square feet of floor area. This represents the largest option by square feet as described in the DEIR Notice of Completion and Availability. Also, there would be up to 1,521 vehicle parking spaces within five- and six-level subterranean parking garages and enclosed at-grade parking.

PURPOSE OF THIS REVIEW

The Hollywood Center (HC; formerly Millennium Hollywood) project has generated years of investigations and technical studies related to geologic/earthquake faulting at the proposed Project Site (Site). In this author's consideration of these thousands of pages of studies, this Draft Environmental Impact Report (DEIR) review is focused on the following three questions you proposed that we address. The answers to these questions govern the suitability of the Site with respect to the earthquake hazard of ground displacement due to a probable earthquake on the Hollywood Fault segment of the Santa Monica-Hollywood-Raymond Fault System, or due to a larger earthquake encompassing the entire (~125-mile long) fault system. The three questions are:

1. Are there faults within the HC Project Site?
2. Where are the faults located within the HC Project Site based on the evidence available?
3. What is the activity level (Holocene or pre-Holocene) of the faults?

This review has utilized the key reports addressing faulting at the Site, some reports not included as part of the DEIR, including a very significant May 2020 report from the United States Geological Survey. The reader is encouraged to look at these reports, particularly the pages, figures, plates, and tables specifically referenced herein. Where emphasis is needed or some expansion is required, new **Figures 1** through **5** are provided with this report. **Figure 1** from the DEIR is the Site map prepared by the developer's geologist, Group Delta Consultants (GDC), showing previous exploration (Cone Penetration Test [CPTs], borings, and trenches) within the East and West divisions of the proposed development. The base map for **Figures 1**, **2** and **3** is faulty due to missing words, letters, and numbers as are all Portable Document Format (PDF) Plates and Figures from the DEIR's Appendix G-1, as circulated and published by the City, preventing the reader from determining the content of the data provided.

DISCUSSION AND EVALUATION OF HC PROJECT SITE FAULTING, AND THE ACTIVITY OF FAULTS WITHIN AND NEAR THE PROJECT SITE

Question 1: Are there Faults within the HC Project Site?

The DEIR begins (page 2, Table IV.D-1) by claiming, numerous times, that prior geotechnical investigations found no Holocene-active faults on either the East or the West Sites. Further Site-specific references to active faulting are found starting on DEIR page IV.D-17 (further referred

to as simply 17). The statements are as follows with the corresponding DEIR abbreviated page numbers:

17 – "The nearest significant active fault to the Project Site is the Hollywood Fault."
18 – "Figure IV.D-2 showing earthquake fault zones and active fault traces."
20 – ". . . the 2015 and 2019 Fault Studies for the Project Site, which are informed by specific investigations of and on the Project Site, indicate that no Holocene-active faulting occurs beneath or extends toward the Project Site, including the Hollywood Fault."
22 – "Within the Hollywood Fault Zone, there is evidence of Holocene-activity, and, therefore, the zone is considered active." And, "The 2015 and 2019 Fault Studies conducted for the Project Site, along with fault investigations conducted for projects in the surrounding areas, including sites north and west of the Project Site, indicate there is no active faulting beneath or extending toward the Project Site."
23 – "This continuous pre-Holocene stratigraphy precludes the possibility of active faulting underlying these (sic) the Project Site."
32 – "As discussed above in the Existing Conditions section, the site-specific 2015 and 2019 Fault Studies included a soil profile horizons evaluation and other investigations that concluded that there is no active faulting beneath the Project Site or extending toward the Project Site." And, "Therefore, because the 2015 and 2019 Fault Studies concluded there is no active faulting beneath the Project Site, development of the Project or the Project with the East Site Hotel Option would not directly or indirectly cause substantial adverse effects, including risk of loss, injury, or death involving fault rupture, and, as such, the impact relative to fault rupture would be less than significant."
33 – "As discussed above, the 2015 and 2019 Fault Studies and Geotechnical Investigations, which also reference various fault investigation studies conducted near the Project Site (see Subsection IV.D.1, Introduction, above), have concluded that there is no active faulting beneath the Project Site or extending toward the Project Site."

Despite the repeated claims of "no active faulting", the following discussion demonstrates the important first fact that GDC has agreed that faults do underlie the site including a continuous fault nearly coincident with the "southern strand", "southern trace", or "southern fault" (or some combination of these terms as generally synonymously used by the CGS) as shown and discussed by the California Geological Survey (CGS, 2014) in its Alquist-Priolo Earthquake Fault Zone (APEFZ) evaluation FER-253 Supplement No. 1 (pages 26 and 27).

In a May 17, 2015 response to a March 17, 2015 letter from the City of Los Angeles (City), GDC responds to California Geological Survey (CGS) comments presenting the CGS conclusions regarding fault features discovered based on the Cone Penetration Test (CPT) soundings used in preparation of GDC cross-sections M-M', N-N', O-O', and P-P' within the HC East and West sites (**Figure 2**; black dotted line). The CGS showed not only more numerous faults on the cross-sections than GDC, but also fault offsets in younger deposits than the GDC showed. Other implications of the CGS conclusions are discussed below, however as related to this question the GDC response states "Our own analysis indicates the potential presence of an inferred inactive fault near CPT-20. This inferred inactive fault was found on other CPT transects O-O' and P-P' on the West Millennium Site. Therefore, its interpretation has both vertical and lateral

correlation across the explorations of both the East and West Millennium Sites." This verifies that GDC accepts that a continuous fault passes near CPT 20 on cross-section M-M' adjacent to Argyle Avenue and extends across the Project Site to at least cross-section O-O' near Ivar Avenue.

The stated purpose of the 2015 and 2019 GDC Fault Studies was to evaluate the Project Site for Holocene-age faulting, as discussed for Question 2 below. The 2019 GDC Fault Study at the southeast corner of Ivar Avenue and Yucca Street confirms the presence of numerous faults crossing the West Senior Building site, with what appears to be the most significant fault F10 **(Figure 3, Inset 3a)** trending nearly east-west through the West Building Second Floor Amenity Deck as it approaches 2015 cross-section O-O' (shown as OE-OE' for the 2019 study).

Accordingly, as to Question 1, there are faults agreed to be across and within the HC Project Site, and the DEIR and Appendix G-1 clearly accept that there are such faults, although consistently claiming there is "no active faulting" or that such faults are "inferred". Faults exist at or near the locations noted by GDC in its May 17, 2015 response letter to the City (black dotted line) and the CGS analysis/conclusions regarding cross-sections M-M', P-P', and O-O' indicate other such young faults exist within the Project Site (see Question 3 below).

Question 2: Where are the Faults Located within the HC Project Site Based on the Evidence Available?

The CGS Alquist-Priolo Fault Evaluation Report (FER) 253 Supplement No. 1 (2014) Figure 7 (page 11) shows a compilation of the Hollywood Fault locations (somewhat approximate on this small map scale) with the origins of each fault section noted as S- and a number, referring to a study location referenced in the FER-253 Supplement No. 1. CGS shows the previous FER fault locations that were removed with X's. The southern red dashed line is the "southern fault" referred to by GDC (2015, pages 15 and 16) and fits the red dashed line for the Yucca Street Strand shown on the CGS's FER-253 Supplement No. 1 Figure 7.

As noted in the previous subsection, in their May 17, 2015 response to the City of Los Angeles, GDC responds to California Geological Survey (CGS) comments presenting the CGS analysis/conclusions regarding fault features. The CGS geologists observed additional fault features based on the Cone Penetration Test (CPT) soundings used in GDC's 2015 preparation of cross-sections M-M' (Plate 7, CPT C-20), N-N', P-P' (Plate 8, CPT C-104), and O-O' (Plate 9, boring B-4) within the HC East and West Sites (**Figure 1**). Given the evidence described in the GDC May 17, 2015 letter discussed above, faults exist beneath the Project Site and in particular three fault locations are linked from cross-section M-M' at the east edge of the East Site to cross-section O-O' in the western half of the West Site (DEIR, Appendix G-1, Figure 8). GDC (2015, Plate 1; **Figures 1 and 2**) shows the fault as a black dotted line crossing the East and West Sites. Planning for the GDC East Trench (DEIR, Appendix G-1, Figure 8) did not allow for it to extend far enough south to intercept the "southern fault" shown by the CGS in FER-253 (see CGS Figure 7 gold-colored trench location lines and **Figure 2**).

GDC (2019) maps faults that they show as continuous across the northwest corner of the West Site at Ivar Avenue with fault F10 showing approximately 30-feet of up-on-the-north reverse fault movement (GDC 2019, Appendix G-2, page 11 and Figure 9.1; **Figure 3**). GDC recognizes and acknowledges the 2019 GDC fault investigation at the southeast corner of Ivar Avenue and Yucca Streets shows numerous faults in trenches that are shown as trending northeast to southwest and east-northeast to west-southwest (Figures 9.1 and 9.2). The fault trenches do not extend far enough to the south to intercept similarly oriented faults, like fault F10, that may trend toward the main West and East Buildings.

As a part of the United States Geological Survey (USGS) mission for the advancement of scientific knowledge, the USGS recently conducted north-south oriented guided-wave and related seismic surveys (USGS, April 2020) along Argyle Avenue between Hollywood Boulevard on the south and Yucca Street on the north. This USGS report, which is directly relevant to the proposed Project Site, was published on May 8, 2020, after release of the DEIR on April 16, 2020. It is attached as **Exhibit C** hereto. The USGS report contains significant new information confirming the location and recency of activity of the main Hollywood Fault, which projects into the HC Site along Argyle Avenue just south of Carlos Avenue. The USGS-confirmed Hollywood Fault location is projected in this report (**Figure 3**) onto the East Site cross-section M-M' near CPTs 27 and 29 where CGS has analyzed/concluded Holocene (and late Pleistocene) faulting exists. This is approximately 35- to 40-feet south of CPT C-20 where CGS and GDC agreed on a fault location (black dots) and approximately 25-feet north of the CGS FER-253 Supplement 1 location of the southern fault trace (**Figure 2**). This southern main Hollywood Fault passes within 50 feet of the East Senior Building, through the center of the 46-story East Building, through the East Site Plaza Ground Floor, and through the south edge of the West Site Plaza Ground Floor.

This most recent USGS data suggests that at least four faults enter the Project Site from the east at Argyle Street (USGS, 2020, Figures 4 and 22 through 25) with the southern USGS fault coincident with the southern fault in the CGS FER-253 Supplement No 1 (their Figure 7). The other three USGS faults at stations (STA) 117, 151, and 191 (**Figure 3**) with an expected similar orientation to the southern fault would pass through the East Senior Building and the north edge of the 46-story East Building, within 10- to 20-feet of the 35-story West Building, through the West Site Plaza Ground Floor, through the East Site Plaza Ground Floor, and through or within 50-feet of the West Building Second Floor Amenity Deck and the West Senior Building.

Question 3: What is the Activity Level (Holocene or pre-Holocene) of the Faults?

As noted above, GDC (2015 and 2019) consistently claims there is no active faulting beneath the Project Site or extending toward the Project Site. These claims are based on GDC's estimating the ages of soils and alluvial layering in trenches and CPT cross-sections. However, the CGS hand-drawn analysis/conclusions on cross-sections M-M', N-N', P-P', and O-O' that were the subject of the May 17, 2015 GDC response to the City showed faulting much higher (younger) in the alluvial layering than shown by GDC (**Figure 4**). These higher layers appear to be Holocene in age, further showing the faults are active. There was a reliance by GDC (2015, Appendix G-1) on non-quantitative, visual age estimates based on factors such a soil coloration for the

alluvial layers exposed in the East and West trenches. The DEIR and GDC age estimates (DEIR, 2020; page IV.D-12) use relative soil-profile development, variously called soil stratigraphy, soil profile horizon, and a soil development index involving visual alluvial layer descriptions.

Regarding the extrapolation of alluvial layering continuity we considered: 1) GDC logging of the 2014-2015 East and West fault trenches paralleling Argyle Avenue from near Yucca Street to Carlos Avenue and 2) bore hole and CPT logging and stratigraphic correlations by GDC along north-south cross-sections M-M', N-N', P-P', and O-O' shown on the GDC 2015 Figure 8. The GDC logging of the East and West fault trenches was conducted by GDC personnel and subcontractors. Significantly, CGS personnel were only allowed very limited access to the trenches (CGS, 2014; FER-253 Supplement, Appendix B page 35) to observe details and look for possible young faults. Subsequent to the GDC interpretations, the CGS documented their fault conclusions with hand-drawn faults on cross-sections M-M', N-N', P-P', and O-O' that were a subject of the May 17, 2015 GDC response to the City discussed above. These hand-drawn CGS conclusions show not only more numerous faults than GDC recognized, but also showed fault offsets in younger deposits, i.e., "active" faulting, where the GDC interpretations did not (GDC, 2015, PDF pages 468 through 473; one example shown on **Figure 4**).

The CGS conclusions, as part of the State's Alquist-Priolo Earthquake Fault Zone (APEFZ) map process, are stated in the 2014 FER-253 Supplement No. 1 on page 26 as follows, with the mentioned "transect" being cross-section M-M':

"The most prominent horizon in this transect, the base of the Argyle Channel, has several anomalous south-side-up steps that may be related to faulting, and several less-continuous units lower in the section appear to support corresponding disruptions. Some of the latter may correspond to the faults observed near the southern GDC Site 2 property line in the eastern trench for that site. However, the main zones of disruption, extending highest in the section, may lie between CPTs C-21 to C-22 and C-26 to C-29. The eastern trench at GDC Site 2 (and extending south into GDC Site 1) did not extend far enough south to fully explore these possible faults and their potential connection to the scarp at Carlos Avenue. Data from a boring log transect on GDC Site 1, that might cross the fault, have not been released."

The "main zones of disruption, extending highest in the section, may lie between CPTs C-21 to C-22 and C-26 to C-29" (CGS FER-253, page 26); these zones correspond to the location of the main Hollywood Fault identified by the USGS (2020; **Exhibit C**, Figures 22 through 25) guided-wave seismic study along Argyle Avenue (Profile HW2) very close to CPTs C-22 to C-24 (**Figures 4 and 5**). This USGS 2020 fault location connects to another location of the Hollywood Fault approximately 350 meters to the east at their other seismic profile line (Profile HW1; USGS Figures 7 through 14). The USGS comments *(emphasis added)* on the Hollywood Fault effects on shallow deposits and therefore the faults' recency of movement are as follows (in quotes):

"An abrupt change in shallow velocities (~400 m/s) is observed at Carlos Avenue, with higher velocities to the north at shallow depths and progressively thicker lower velocity materials southward

toward Hollywood Boulevard. *The abrupt change in shallow V_P at Carlos Avenue is similar to the change in V_P seen along Profile HW1 at the apparent Hollywood Fault (fig. 7).*"

"Thus, *both guided waves and V_P are suggestive of near-surface faulting slightly south (10–25 m) of the center of Carlos Avenue* and about 20 to 35 m south of the center of Yucca Street." (At STA 106 on **Figure 3.**)

"From the south end of Profile HW2 (at Hollywood Boulevard) to approximately Carlos Avenue, *a 7- to 10-m-thick zone of low-V_S (<300 m/s) materials is present in the near surface; this layer pinches out at Carlos Avenue* in a manner similar to that seen in the tomographic V_P model (fig. 7). Between that 7- to 10-m-thick layer and the base of the model, V_S is high relative to the north end of Profile HW2."

"*All of these models show prominent changes in shallow-depth structure near Carlos Avenue* and slightly south of Yucca Street *that are consistent with shallow faulting in those locations.*"

The reference to "pinching out" in the third comment above indicates the extent of the shallow alluvial layer ended over a rather short distance, likely due to shallow Holocene faulting. Comparing **Figure 4C** with the East Trench East Wall trench log (GDC, 2015, Plate 4a), the thickness of the Argyle sand (Qs = yellowish layer, but the symbols are not readable on the GDC PDF file from the DEIR circulated to the public) is about 15-feet, nearly identical to the dark blue plus the light blue (roughly 2.5 Vp/Vs ratio) alluvial layering in **Figure 4C** at about distance STA 115 m (meters). USGS (2020) shows a fault at station 117 m (**Figure 3**). The Qs begins to rapidly thicken at Carlos Avenue indicating uplift on the north (right) side of the Hollywood Fault cutting through/offsetting the Holocene alluvial layer. All of this indicates active faulting through the HC Site.

Similarly showing that the fault is active, located approximately 675-feet east of the USGS guided-wave survey Profile HW1 is the Hollywood Courthouse located at 5925 Hollywood Boulevard (Ninyo & Moore, 2015). The 2015 Ninyo & Moore study (formally received by the CGS as an APEFZ investigation in June 2015) found active faulting (offset Holocene alluvial layers) through the northern one-half of the two-story court building and the south side of the one-story underground parking structure. We understand that the improvements planned for this federal courthouse have been cancelled due to the presence of the active faults. These are active faults within the Hollywood Fault zone that directly align with the USGS (2020) locations of the Hollywood Fault (e.g., USGS Figures 13 and 14) confirming the linkage of active faults east of the HC Site continuously to the HC Project Site.

To the west of the HC Project Site two studies again demonstrate Holocene faulting on the Hollywood Fault, the first in line with the southern trace only 0.7- to 1.3-miles west of the HC Site. From Dolan et al. (2001) it is stated (*emphasis added*):

"The *most recent faulting* at Camino Palmero *occurred after deposition of ~9 ka sediments and prior to deposition of sediments dated as ~6 ka* (Dolan et al., 1997; 2000b). However, *a pronounced ground-water barrier* at Highland Ave, between La Brea Avenue and Cahuenga

Boulevard, *suggests that steeply north-dipping faults extend upward into late Holocene deposits* there (Lindvall et al., 2001)."

The USGS 2020 investigation (their Figure 26) also performed seismic studies in the Santa Monica Fault segment west of HC and found (*emphasis added*):

"The seismic sources for the BHGW1 seismic survey were located about 500 and 647 m southwest of the southernmost and northernmost ends of Profile BH1, respectively (fig. 27). *We chose this site (SP1)* to generate seismic sources *because it was the location of a previous coring and CPT transect, in which an active trace of the Santa Monica Fault was identified.*"

"In addition, the *BHGW2 data also are consistent with the presence of as many as three other fault traces along Lasky Drive*. Importantly, all five of these high-PGV zones can be inferred on both the BHGW1 and BHGW2 data (figs. 28, 30). *Thus, we suggest that distributed shallow-depth faulting likely is present at several locations along Lasky Drive."*

In 2013 the U. S. Geological Survey, the California Geological Survey, and the Southern California Earthquake Center published the *Uniform California Earthquake Rupture Forecast – Version 3* (referred to as UCERF3, 2013; https://pubs.usgs.gov/of/2013/1165/) with the purpose to examine the faults in California and develop a mathematically based forecast as to the frequency and magnitude of earthquake ruptures occurring on these faults. As noted in the publication, all the findings and conclusions of this study were independently reviewed by scientists and engineers from independent institutions. UCERF3 indicates that the Hollywood Fault is repeatedly active between 4,000 and 11,000 years and produced rupture earthquake magnitudes between 5.0 and about 7.0 during this portion of the Holocene. Also, the faults to the east and west of the Hollywood Fault (the Raymond Fault to the east, the Santa Monica Fault and the Malibu Coastal Fault to the west) show a likely earthquake fault participation (all four faults being the source of at least a magnitude 7.0 earthquake) about every 4,000 years. Therefore, the UCERF3 study shows that the Hollywood Fault is "active" with the highest large magnitude earthquake recurrence rate in the approximately 4,000-year cycle, along with other faults that make up this larger fault system. This larger continuous system is approximately 125 miles in length, and all of it is Holocene "active".

CONCLUSIONS

Significant evidence is presented by the California Geological Survey (CGS), the United States Geological Survey (USGS), and the reports of Group Delta Consultants, Inc. (GDC) to demonstrate conclusively that:

1) There is at least one continuous fault extending from Argyle Street on the East Site to within a few hundred feet from Ivar Street on the West Site (DEIR, Appendix G-1 [GDC, 2015], Figure 8; CGS, 2014, FER-253 Supplement Figure 7). This is agreed upon by GDC and CGS (GDC, Appendix G-1, PDF page 464 Conclusion and PDF page 466, Plate 1, black dots [**Figure 1**]).

2) The fault in item (1) above is nearly parallel to, but separate from, the southern fault slightly re-located by CGS (2014, FER-253 Supplement No. 1, Figure 7 and pages 14, 16, 21, 26, and 28; **Figure 2**) for the FER Supplement No. 1. More recent USGS (2020) data suggests that at least four other faults enter the Project Site from the east at Argyle Avenue (USGS, 2020, Figures 4 and 22 through 25: **Figure 3**) with the southernmost fault coincident with the southern fault in the FER-253 Supplement No. 1. All of these projected faults (**Figure 3**) pass through or very near the proposed 35- and 46-story skyscrapers and/or the senior buildings.
3) The CGS hand-drawn analysis/conclusions on cross-sections M-M', N-N', P-P', and O-O' that were a subject of the May 17, 2015 GDC response to the City show faulting much higher in the alluvial layering (therefore younger) than shown by GDC (**Figure 4**). These higher layers appear to be Holocene in age, further showing the faults are active. Due to GDC's lack of quantitative age dates for the key alluvial layers (e.g., Qm) exposed in the East and West trenches, the DEIR and GDC (2015) age estimates are dependent on dating by soil stratigraphy.
4) Shallow depth faulting in the area of an active Hollywood Fault trace (**Figure 5**) indicates the Santa Monica Fault west of the HC Site is Holocene active (USGS, 2020), the Hollywood Fault west of the HC Site is Holocene active (Dolan et al., 2001), and the Hollywood Fault east of the HC Site is Holocene active (Ninyo & Moore, 2015 and USGS 2020). The UCERF3 (USGS and CGS, 2013) demonstrates that the Hollywood fault is part of an approximately 125-miles long active fault system. These studies unequivocally demonstrate that the Hollywood Fault within the HC Site is Holocene active.

CLOSURE

This report has been prepared for the sole use and benefit of our client. Any errors or omissions noted by any party reviewing this report, and/or any other engineering geology/fault conditions aspect of the project, should be reported to Wilson Geosciences Inc. in a timely fashion. No subsurface investigation was authorized or performed by Wilson Geosciences Inc., and conclusions, recommendations, opinions, and other information contained in this report are based upon the evaluation of investigations, analyses, and reports prepared by others within/beneath/near where the project improvements would ultimately be made.

The analysis, results, and conclusions were prepared in general compliance with normal industry practice in the City and County of Los Angeles and meet the standard of care of our profession at this time. Final decisions on matters presented are the responsibility of the client and/or the governing agencies. Wilson Geosciences Inc. and its employees make no warranties either expressed or implied in any respect as to the engineering geology/fault conditions at the site. The Client should consider any transferring of information or other-directed use by the Client as "advice by the Client".

Thank you for the opportunity to participate in this process and to offer the above comments.

Respectfully Submitted,
Wilson Geosciences Inc.

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Certified Engineering Geologist No. 928

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Group Delta Consultants, Inc. (GDC), 2016, Surface Fault Rupture Evaluation Report, Central Hollywood Tract, No. 2, Lots 1,2,3 and 5, 1718 Vine Street, Los Angeles, California, July 28, 2016.

Group Delta Consultants, Inc. (GDC),, 2015, Fault Investigation Report, Tract No. 26206, Lot 1 [APN 5546-003-015 & 016] and Hollywood Tract, Block 22, Lots 4.2, 5, 6, and 7 and Lots 9, 10, and 11 [APN 5546-003-003, -004, -009, -010, 019, -020] 6305 Yucca Street Los Angeles, California.

Ninyo & Moore, 2015, Supplemental Fault rupture hazard evaluation, Hollywood Courthouse, Los Angeles, California, Project No. 402132007, June 15, 2015.

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United States Geological Survey (USGS), 2020, 2018 U.S. Geological Survey–California Geological Survey fault-imaging surveys across the Hollywood and Santa Monica Faults, Los Angeles County, California: U.S. Geological Survey Open-File Report 2020–1049, 42 p., https://doi.org/10.3133/ofr20201049 , by Catchings, R.D., Hernandez, J., Goldman, M.R., Chan, J.H., Sickler, R.R., Olson, B., and Criley, C.J..

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Figure 3 – This Report's Westward Projection of May 2020 USGS Faults from Argyle Avenue (USGS Profile HW2▶) Westward to Near Ivar Avenue Showing GDC 2019 Fault F10 East of Ivar Avenue on Figure 9.1 (Note Inset 3a)

Figure 4 – California Geological Survey (CGS) Fault Location Conclusions Showing Younger Faulting After Re-examination of Group Delta Consultants, Inc. Cone Penetration Test (CPT) Interpretations on Cross-section M-M'

Figure 5 – USGS Guided-Wave Seismic Survey Figures 13 and 14 (Profile HW1) Compared to Figure 24 (Profile HW2); Hollywood Fault Location at Carlos Avenue and Argyle Avenue (Figure 2) and Disruption of Shallow Alluvial Layers

LIST OF EXHIBITS

Exhibit A – Wilson Geosciences Inc. Resume of Undersigned

Exhibit B – Figures

Exhibit C – USGS Open File Report 2020-1049, United States Geological Survey (USGS; Catchings et al., 2020)

Exhibit D - Ninyo and Moore, 2015, Supplemental Fault rupture hazard evaluation, Hollywood Courthouse, Los Angeles, California, Project No. 402132007, June 15, 2015.

EXHIBIT A

Wilson's Resume

KENNETH WILSON

Principal Engineering Geologist

EDUCATION

University of California at Riverside, B.S. Geological Sciences, 1967
University of California at Riverside, M.S. Geological Sciences, 1972

PROFESSIONAL REGISTRATIONS

Professional Geologist, California, #3175 [Issued 1-08-1974; Expires 2-28-2021]
Certified Engineering Geologist, California, #928 [Issued 1-08-1974; Expires 2-28-2021]

PROFESSIONAL SUMMARY

Kenneth Wilson is responsible for management, technical supervision and performance of engineering geology, geotechnical, environmental impact, and environmental geology projects, and is a Professional Geologist (#3175) and Certified Engineering Geologist (#928) in California. He performs and supervises environmental assessments for commercial, industrial and government projects covering the disciplines of hydrogeology, engineering geology, geology, hydrology, seismicity, tectonics, faulting, mineral resources, and waste management. Geotechnical studies include fault evaluations, ground failure assessments, slope stability and foundation materials characterization, liquefaction potential, flooding hazards and site selection. The emphasis of his work is on defining geologic and geotechnical conditions, and hazards, which may affect the feasibility and design of any type of development project. Mr. Wilson has over 30 years of technical performance and project experience in critical facilities studies, radioactive/mixed/hazardous waste management, energy plant site licensing, impacts to surface and groundwater resources, waste disposal site development, dams and reservoirs and numerous other engineered structures. Specialized experience is in engineering geology in support of geotechnical studies, site selection/evaluation, seismic safety, integration of multidisciplinary technical teams, project management, and EIRs, EAs, and EISs.

PROFESSIONAL EXPERIENCE

Wilson Geosciences, Engineering and Environmental Geology [1989-Present]: Principal Engineering Geologist

Responsible for all management, technical and marketing activities for engineering geology, environmental impact, and environmental geology projects. Performs and supervises environmental assessments for commercial, industrial and government projects covering the disciplines of hydrogeology, engineering geology, geology, hydrology, seismicity, tectonics, faulting, mineral resources, and waste management. Geotechnical studies include fault evaluations, ground failure assessments, slope stability and foundation materials characterization, liquefaction potential, flooding hazards and site selection

The Earth Technology Corporation [1974-1989]: Corporate Vice President [1987-1989]; Vice President; Director, Program Management [1985-1987]; and Vice President, Associate and Senior Manager [1974-1988]

Vice President, Associate and Senior Manager: Mr. Wilson had numerous challenging technical and management responsibilities and assignments during the period 1974-1988. There was a wide range of projects for which he had a technical role, either performance, supervisory, or management in scope. A substantial portion of the time he was Program Manager for the Missile-X (MX) ICBM, Siting and Characterization Studies in the Western and Midwestern United States: for United States Air Force, Ballistic Missile Office, and the Southern Region Geologic Project Manager (SRGPM) in Mississippi, Louisiana, Texas, Georgia, South Carolina, Virginia, Maryland for Office of Nuclear Waste Isolation (ONWI) and Office of Crystalline Repository Development (OCRD). These projects were national in scope and involved most geologic, geotechnical, geophysical, environmental, and hydrologic disciplines

Converse Consultants (formerly Converse, Davis and Associates) [1970-1974]: Staff and Project Geologist

Staff and Project Geologist: Conducted and supervised investigations in southern, central, and northern California, southern Nevada, and eastern Washington. Numerous earthquake and fault risk studies were performed for earth dams and reservoirs, high-and low-rise buildings, hospitals and schools, proposed nuclear power plant sites, water storage tanks, and large-diameter pipelines. Landslide and other slope failure studies were performed in rock and soil terrains. Offshore studies planned and conducted include coastal geophysical (seismic reflection, side scan sonar, fathometer), sampling and scuba investigations near Monterey and Dana Point, California.

PROFESSIONAL ORGANIZATIONS

Member Association of Engineering Geologists, National and Southern California Sections

REPRESENTATIVE EXPERIENCE ON CEQA/NEPA PROJECTS CONSIDERING THE GEOLOGY AND SOILS TECHNICAL ISSUE AREA: SUMMARIES OF FOUR RELEVANT PROJECTS

Fault Rupture Study Area Report for the Canoga Transportation Corridor Lassen Street/Railroad Overcrossing, Chatsworth, California, for Diaz-Yourman & Associates (2009): The Canoga Transportation Corridor Project Draft EIR identified the Fault Rupture Study Areas, an area where fault rupture potential exists, within the project area, but did not identify the underlying basic source data for the fault locations within the FRSAs. Wilson Geosciences Inc. prepared a study to identify the potential for fault rupture through the grade separation area (bridge site) within the FRSA. The study determined if there was evidence for a fault or faults within the bridge site using (a) geologic and topographic map analysis, (b) analysis of information from multiple geotechnical borings, and (c) geophysical data (seismic refraction and electrical resistivity) collected within and near the proposed bridge location. Evidence for Holocene warping of geologic features is also considered. It was determined that no evidence existed within the grade separation area for active folds or faults.

DEIR/IS Review and Fault Activity Investigation at La Loma Bridge, Pasadena, Los Angeles County, California, Diaz-Yourman & Associates (2004-2008): Wilson Geosciences Inc. (WGI) previously investigated the La Loma Bridge with Hushmand Associates, Inc. (HAI). Geologic, geotechnical, faulting, and seismic conditions at the La Loma Bridge were investigated by WGI in 2004 and in 2007-2008 with HAI. The 2004 investigations were in support of an EIR/EIS related to the bridge rehabilitation and to early design considerations. Investigations in 2007-2008 included field studies to locate the active Eagle Rock fault and to assess its ground rupture potential. Phase 1 consisted of the following tasks: Task 1 – Review of Existing Data and Geologic Maps; Task 2 – Review Seismic Refraction Survey and Results; Task 3 – Review DYA's Boring Logs; Task 4 – Test Pits; Task 5 – Phase 1 Geologic Report. Phase 2 consisted of: Task 1 - Geologic Studies; Task 2 -Seismic Fault Rupture Analysis; Task 3 – Probabilistic Seismic Hazard Assessment (Ground Motions and Fault Rupture Displacements); and Task 4 – Report and Appendices.

WGI performed an engineering geology assessment to determine the location and probable fault displacement characteristics of the Eagle Rock fault previously mapped as passing through the bridge site. Geologic mapping, detailed cut exposure logging, seismic refraction geophysics, and hollow-stem auger, rotary core, and sonic core drilling techniques were used to obtain field data. An engineering geology and fault analysis was performed, including a probabilistic fault displacement hazard assessment. A report was prepared describing the scope, investigation, and analyses completed.

Geologic and Fault Hazard Evaluation for Caltrans Modifications to Interstate 710, Long Beach, Los Angeles County, California, Diaz-Yourman & Associates (2013): WGI performed the work for this project, which resulted in a series of alignment geologic maps and text sections for the DYA preliminary design report using available data and project specific subsurface investigations. Caltrans plans a series of modifications to the I-710 freeway infrastructure from the coast at Ocean Boulevard north to Interstate 5. We evaluated geologic and fault conditions and hazards for the Southern and Central segments that pass through Long Beach. The alignment is affected by the active Newport-Inglewood fault zone (NIFZ), by underlying non-engineered artificial fill, natural low-density alluvial deposits, shallow groundwater, liquefiable soils, and settlement/expansive soils. Estimates were made of the potential movements on the NIFZ and plans include potentially performing field studies to locate the faults crossing of the alignment.

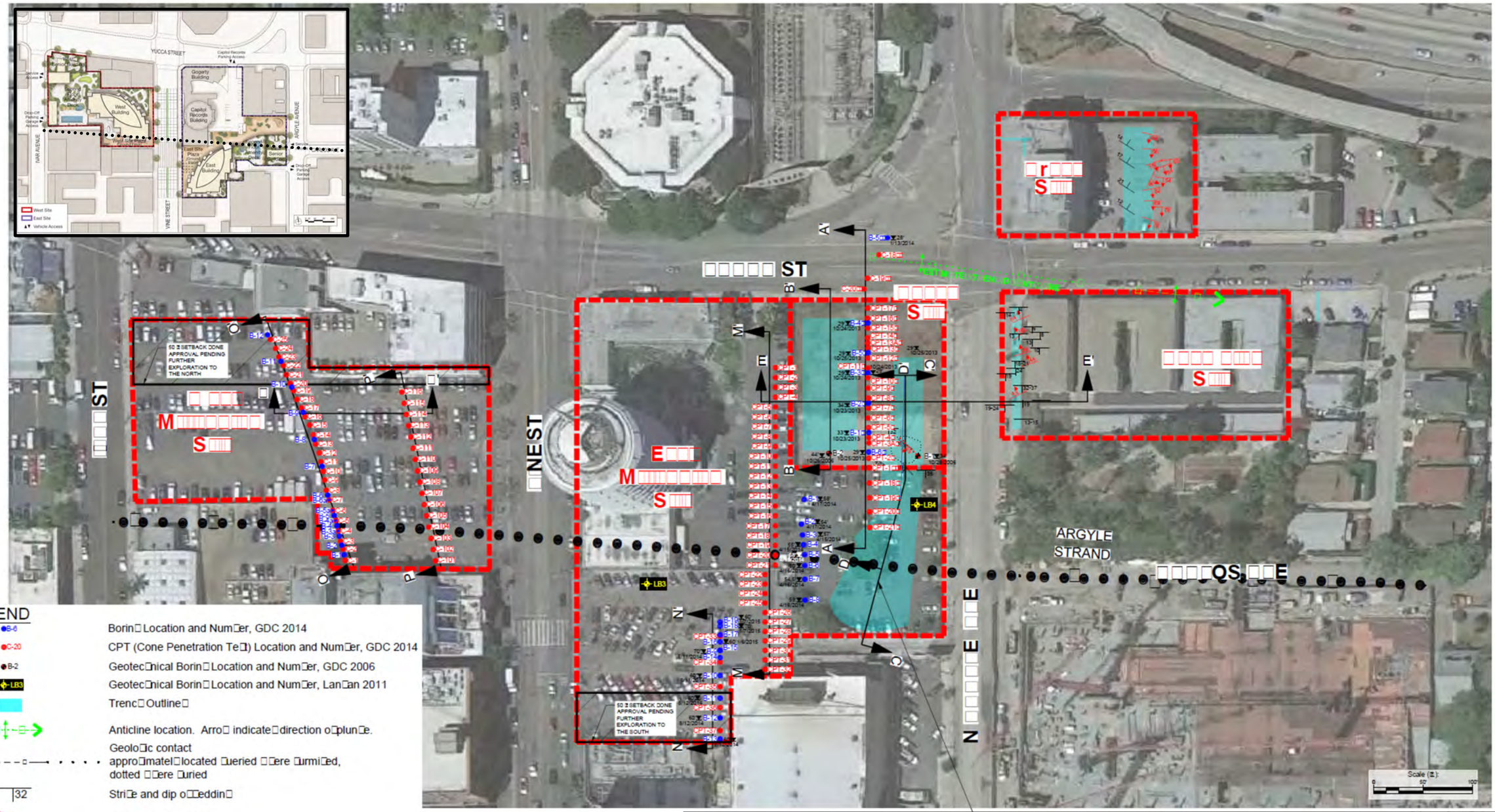
Fault Rupture Study, Lassen Street Bridge, Metropolitan Transit Authority (MTA) Orange Line, Canoga Transportation Corridor Project, Chatsworth, Los Angeles County, California, Diaz-Yourman & Associates (2009): The Canoga Transportation Corridor Project Draft EIR Section 4.10 Geology, Soils, and Seismicity identified the Fault Rupture Study Areas (FRSA) depicted in the 1996 Safety Element of the Los Angeles City General Plan as an area where fault rupture potential exists. The EIR identified one specific paper (Baldwin et al, 1998) as the data source for the earthquake potential information for the two faults that defined the FRSAs (the Northridge Hills and Chatsworth Reservoir faults), but did not identify the underlying basic source data for the fault locations within the FRSAs. The primary purpose of this study is to determine if there is evidence for a fault or faults within the bridge site using (a) geologic and topographic map analysis, (b) analysis of information from multiple geotechnical borings, and (c) geophysical data (seismic refraction and electrical resistivity) collected within and near the proposed bridge location. In addition, the goal was to determine the approximate age of geologic features in order to either "date" the last movement on any detected faults or to estimate an age on the unfaulted geologic materials. Since the Northridge Hills faults is not known to offset near surface geologic units/formations, but rather warps the units, evidence for warping of geologic features was also considered.

COURSES, SEMINARS, AND WORKSHOPS

- Seismic Interpretation for Geologists, by the Oil and Gas Consultants International, Inc., Intensive Short Course, Houston, Texas
- Engineering Geophysics Short Course, Colorado School of Mines, Office of Continuing Education, Golden, Colorado
- Fundamentals of Ground-Water Monitoring Well Design, Construction, and Development, Las Vegas, Nevada
- Field Practices for Collecting Representative Ground-Water Samples, Las Vegas, Nevada
- New Developments in Earthquake Ground Motion Estimation and Implications for Engineering Design Practice, Seminar organized by Applied Technology Council and funded by U.S. Geological Survey, Los Angeles, California
- Seismic Hazards Analysis, Course sponsored by Association of Engineering Geologists, Los Angeles, California

EXHIBIT B

Figures 1 through 5



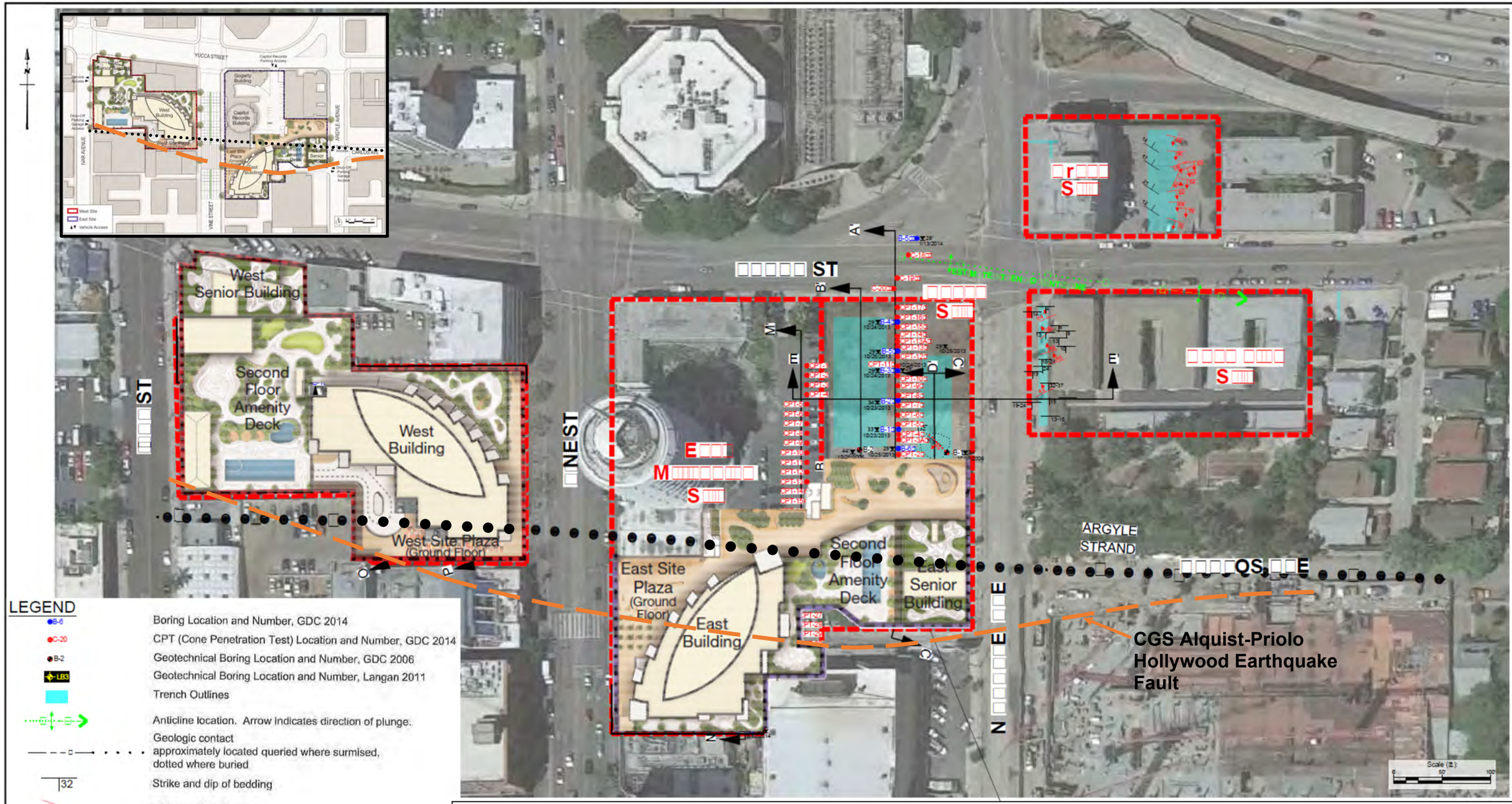
LEGEND

- Borin□ Location and Num□er, GDC 2014
- CPT (Cone Penetration Te□) Location and Num□er, GDC 2014
- Geotec□nical Borin□ Location and Num□er, GDC 2006
- Geotec□nical Borin□ Location and Num□er, Lan□an 2011
- Trenc□ Outline□
- Anticline location. Arro□ indicate□direction o□plun□e.
- Geolo□ic contact approximatel□located □ueried □□ere □urmi□ed, dotted □□ere □uried
- 32 — Stri□e and dip o□□eddin□
- Stri□e and dip o□□ault
- 70 / 49 — Stri□e and dip o□□uried □ault
- Approximate Location o□Inferred Fault
- 45' 1/29/2014 — Ground □ater level □elo□ □round □ur□ace encountered and date mea□ured
- A A' — Cro□□ Section
- Propert□ Line

Explanation – This is the GDC 2015 site map (2015; GDC Plate 1) showing borings, CPTs, trenches and the location of the CGS/GDC agreed (May 17, 2015 response letter to City of Los Angeles) upon location of the continuous fault (large black-dotted line) crossing the East and West Sites (see inset upper left for proposed development layout). Refer to this field investigation site map for any text discussion referring to CTPs, borings, trenches, or cross-section.

Figure 1 – East and West Project Sites Showing Past Group Delta Consultants, Inc (GDC) Exploration Locations and Cross-sections

8/5/2014	KM	GROUP DELTA	GROUP DELTA CONSULTANTS, INC 370 Amapola Ave. Suite 212 Torrance, CA. 90501	BORING, CPT, CROSS SECTION AND TRENCH LOCATION WEST/EAST MILLENNIUM SITES	LA1191A
10/31/2014	MR				AS SHOWN
2/28/2015	Modified from GDC, 2014a				



LEGEND

- Boring Location and Number, GDC 2014
- CPT (Cone Penetration Test) Location and Number, GDC 2014
- Geotechnical Boring Location and Number, GDC 2006
- Geotechnical Boring Location and Number, Langan 2011
- Trench Outlines
- Anticline location. Arrow indicates direction of plunge.
- Geologic contact approximately located queried where surmised, dotted where buried
- 32 — Strike and dip of bedding
- 70 / 49 — Strike and dip of fault
- Strike and dip of buried fault
- Approximate Location of Inferred Fault
- 45' 1/29/2014 — Ground water level below ground surface encountered and date measured
- A A' — Cross Section
- Property Line

Explanation – This is the GDC 2015 site map (Plate 1) showing the proposed development with respect to the location of the CGS/GDC agreed upon (May 17, 2015 response letter to City of Los Angeles) location of the continuous fault (large black dots) that passes through the East Senior Building, 15-feet north of the East Building tower, through the south edge of the West Site Plaza Ground Floor, and 30-feet south of the West Building tower. The APEFZ Hollywood Fault (orange) crosses within 50-feet of the East Senior Building, through the center of the East Building, and through the south edge of the West Site Plaza Ground Floor.

Figure 2 – East and West Project Sites Showing the Proposed Development, and the Verified Fault and the CGS Hollywood Fault Crossing the Project Site

8/5/2014	KM	GROUP DELTA CONSULTANTS, INC 370 Amapola Ave. Suite 212 Torrance, CA. 90501	BORING, CPT, CROSS SECTION AND TRENCH LOCATION	LA1191A
10/31/2014	MR			AS SHOWN
2/28/2015	Modified from GDC, 2014a		WEST/EAST MILLENNIUM SITES	1

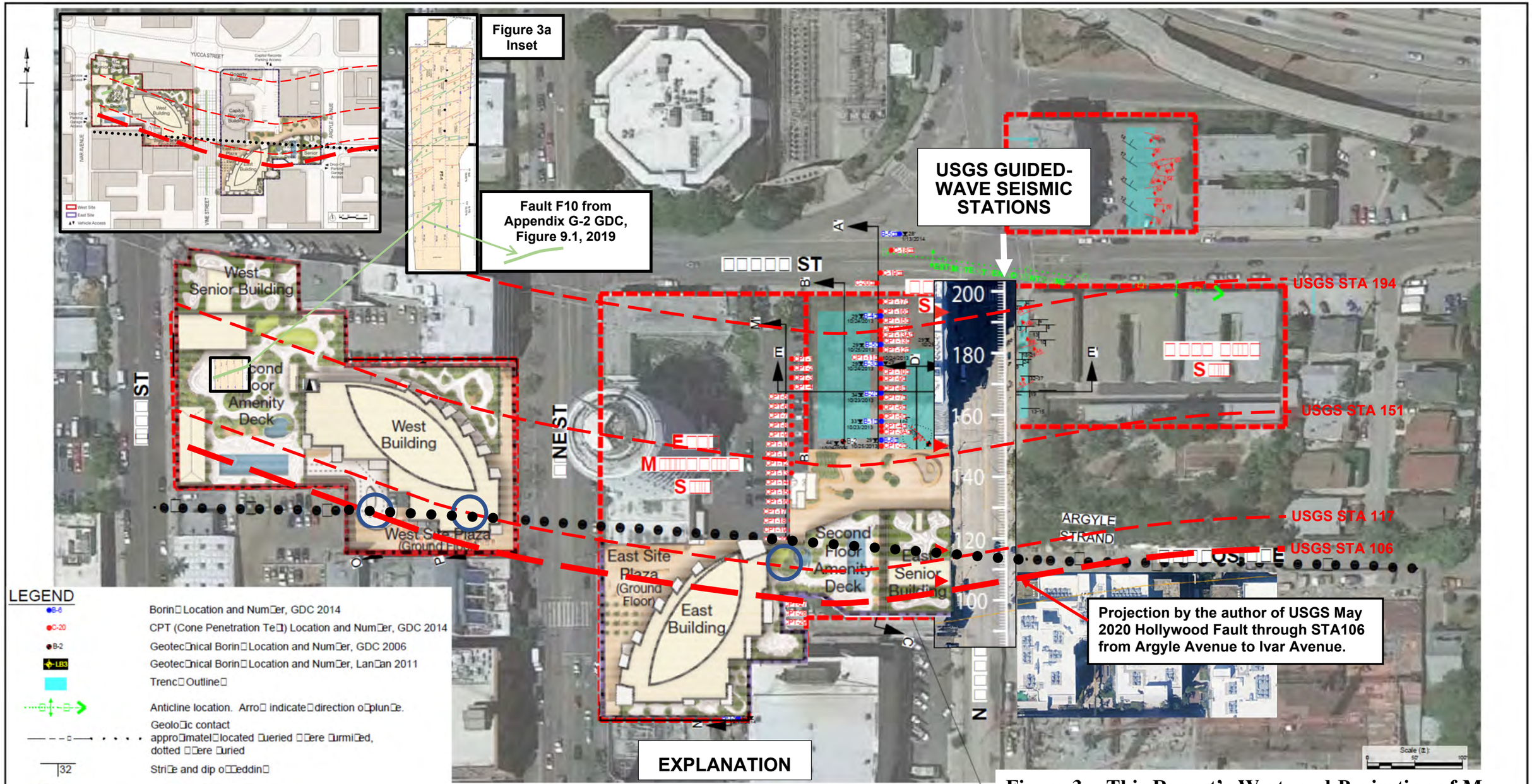


Figure 3 – This Report's Westward Projection of May 2020 USGS Faults from Argyle Avenue (USGS Profile HW2) Westward to Near Ivar Avenue Showing GDC 2019 Fault F10 East of Ivar Avenue on Figure 9.1 (Note Inset 3a)

8/5/2014	KM	GROUP DELTA CONSULTANTS, INC 370 Amapola Ave. Suite 212 Torrance, CA. 90501	BORING, CPT, CROSS SECTION AND TRENCH LOCATION WEST/EAST MILLENNIUM SITES
10/31/2014	MR		LA1191A AS SHOWN
2/28/2015	Modified from GDC, 2014a		

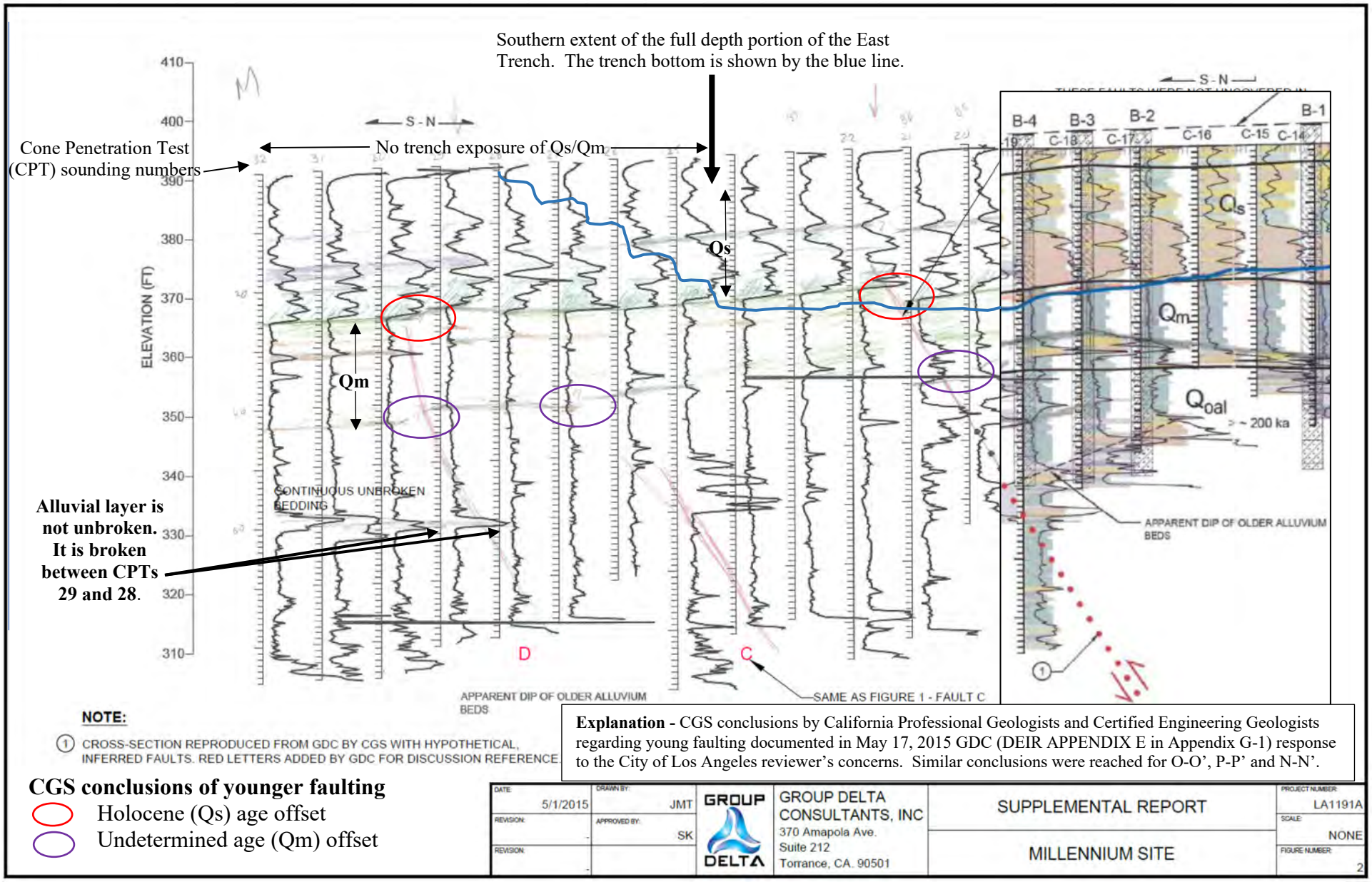
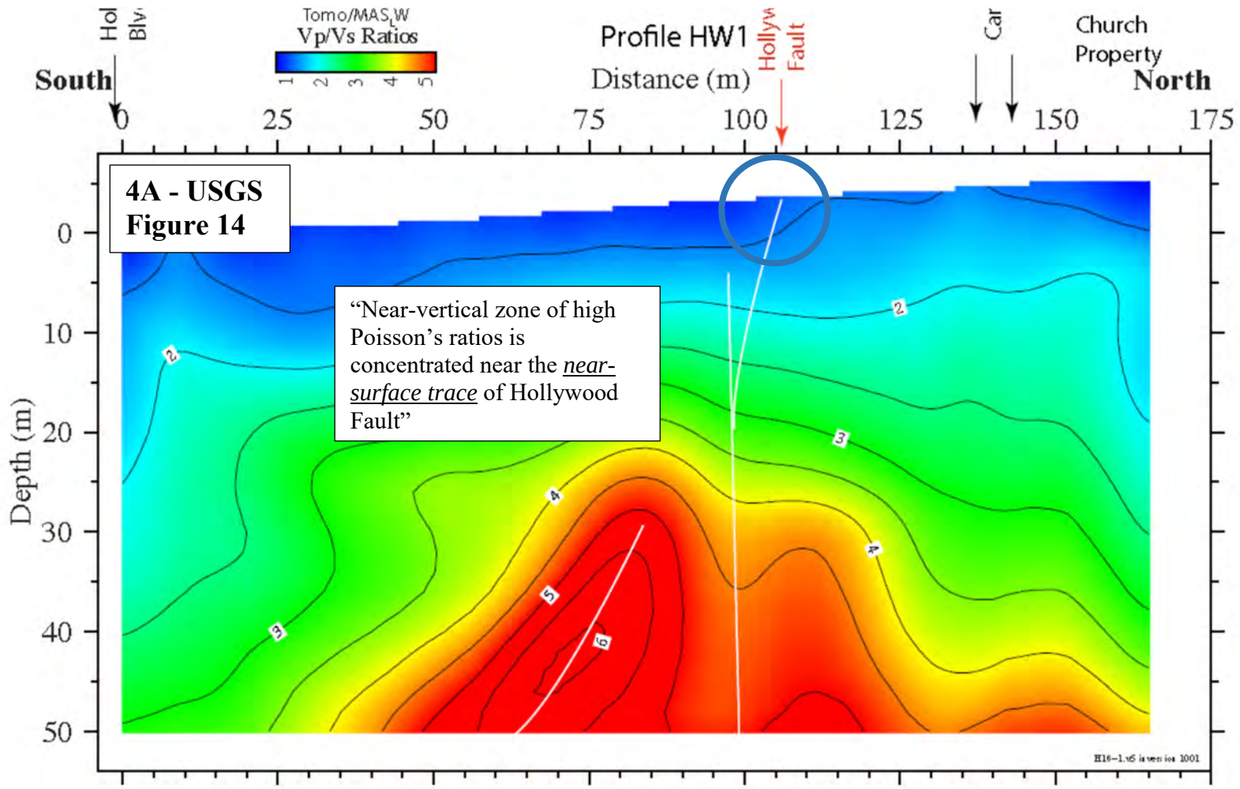
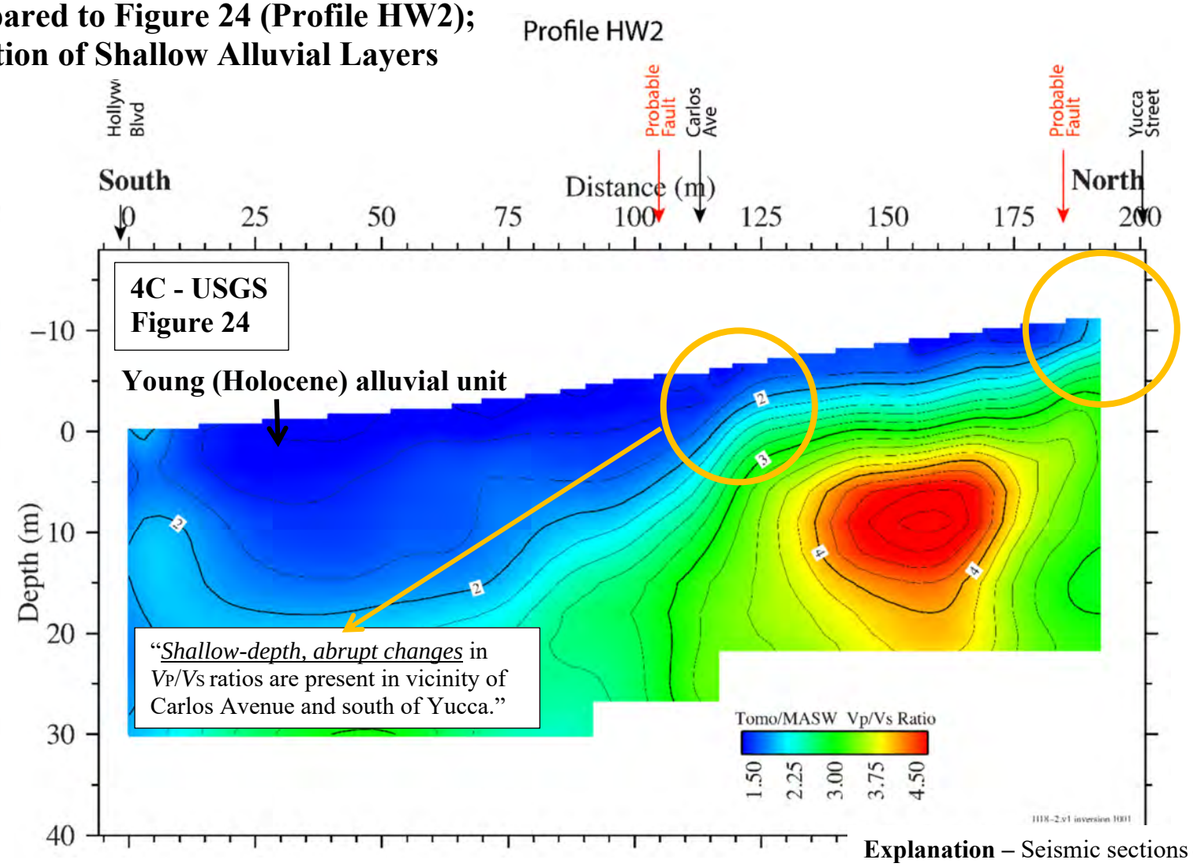
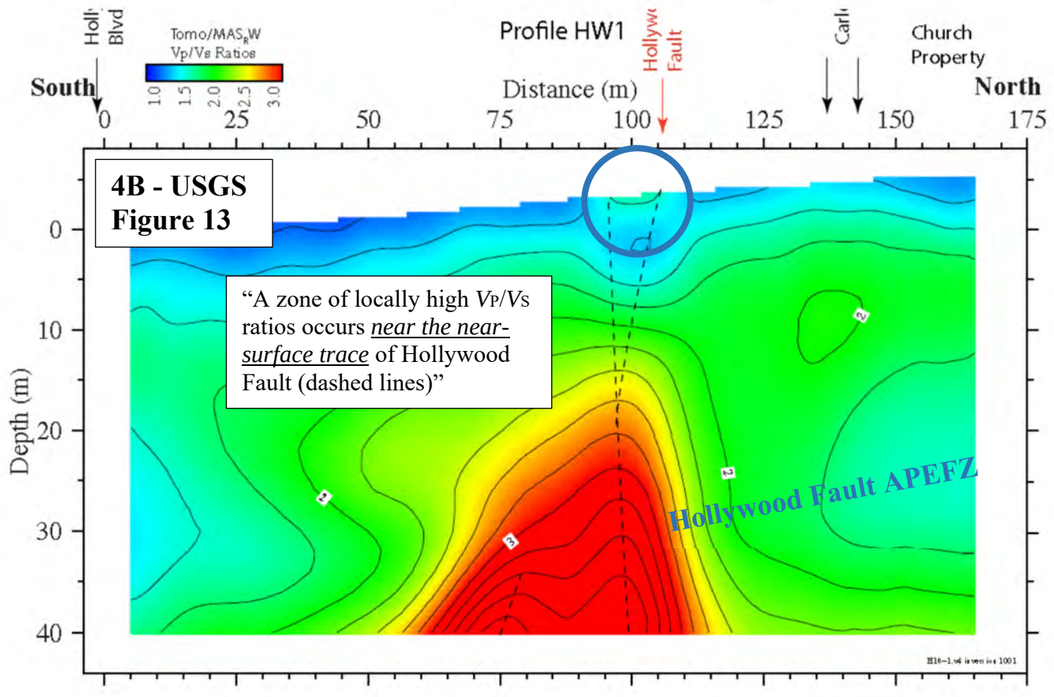


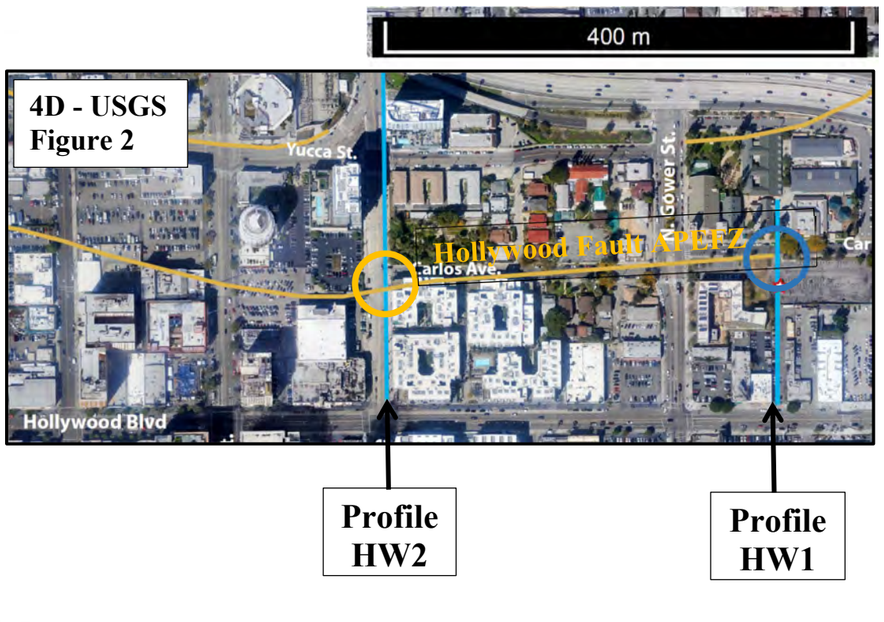
Figure 4 – California Geological Survey (CGS) Fault Location Conclusions Showing Younger Faulting After Re-examination of Group Delta Consultants, Inc. Cone Penetration Test (CPT) Interpretations on Cross-section M-M'

Figure 5 – USGS Guided-Wave Seismic Survey Figures 13 and 14 (Profile HW1) Compared to Figure 24 (Profile HW2); Hollywood Fault Location at Carlos Avenue and Argyle Avenue (Figure 2) and Disruption of Shallow Alluvial Layers









Explanation – Seismic sections 4A and 4B are from Profile HW1 shown on map 4D (USGS, May 2020). Seismic section 4C on map 4D is from Profile HW2 along Argyle adjacent to the Hollywood Center Site. The orange and blue circles on 4D show the intersection points of the HW1 and HW2 Profiles with the Hollywood Fault.

Blue circles on 4A to 4B (USGS, 2020) showing the main active Hollywood Fault within a few feet of the ground surface at HW1 (thin white and thin black lines); USGS quotes in text box, *emphasis* added. The orange circles on 4C for HW2 along Argyle Avenue shows the abrupt change in thickness of the dark blue alluvial formation (Holocene Qs; **Figure 4**) described in the USGS 2020 quote in the text box, *emphasis* added.

EXHIBIT C

USGS Open-File Report 2020-1046 (2020)

REPORT OMITTED SEE EXHIBIT B

TO DECEMBER 16, 2020 LETTER

EXHIBIT D

Ninyo & Moore, Hollywood Courthouse Fault Investigation (2015)

Ninyo & Moore
Geotechnical and Environmental Sciences Consultants

SUPPLEMENTAL FAULT RUPTURE HAZARD EVALUATION
HOLLYWOOD COURTHOUSE
5925 HOLLYWOOD BOULEVARD
LOS ANGELES, CALIFORNIA

PREPARED FOR:
Judicial Branch Capital Program Office
Design and Construction Unit
2255 North Ontario Street, Suite 220
Burbank, California 91504

PREPARED BY:
Ninyo & Moore
Geotechnical and Environmental Sciences Consultants
475 Goddard, Suite 200
Irvine, California 92618

June 15, 2015
Project No. 402132007

June 15, 2015
Project No. 402132007

Mr. Scott Shin
Judicial Branch Capital Program Office
Design and Construction Unit
2255 North Ontario Street, Suite 220
Burbank, California 91504

Subject: Supplemental Fault Rupture Hazard Evaluation
Hollywood Courthouse
5925 Hollywood Boulevard
Los Angeles, California

Dear Mr. Shin:

In accordance with your request, we have performed a supplemental fault rupture hazard evaluation for the Hollywood Courthouse at 5925 Hollywood Boulevard in Los Angeles, California. We previously prepared a fault rupture hazard evaluation report dated February 24, 2015 for the proposed improvements to the existing courthouse. The purpose of this study was to further evaluate the potential for faulting south of the existing building and to provide preliminary design recommendations for a new building. This report presents our findings and conclusions regarding the presence of faulting underlying the area south of the existing building.

Ninyo & Moore appreciates the opportunity to be of service on this project.

Respectfully submitted,
NINYO & MOORE

James J. Barton, PG, CEG
Senior Geologist

Lawrence Jansen, PG, CEG
Principal Geologist

Daniel Chu, PhD, PE, GE
Chief Geotechnical Engineer

JJB/LTJ/DC/mlc/sc

Distribution: (4) Addressee (3 hard copies; 1 via e-mail)

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Appendices

1. INTRODUCTION

In accordance with your request, we have performed a supplemental fault rupture hazard and geotechnical evaluation for the Administrative Office of Courts (AOC), Hollywood Courthouse located at 5925 Hollywood Boulevard in Los Angeles, California (Figure 1). We previously performed a fault rupture hazard and geotechnical evaluation for proposed improvements to the existing courthouse, the results of which were presented in the referenced reports dated February 24 and March 16, 2015. The purpose of this study was to further evaluate the potential for faulting south of the existing building.

Based on our previous work, possible active faulting was discovered near the center of the building (Figure 2). The possible faulting was based on our interpretation of discontinuities in the stratigraphy in the alluvial soils underlying the existing building. The offset deposits were considered to be late Pleistocene to early Holocene in age. The subject property and location of the possible faulting is near the active Hollywood fault zone mapped by the California Geological Survey (2014). In order to confirm the presence and activity of the possible faulting under the building, additional exploration would be involved.

As an alternative to the proposed remodel improvements, we understand that a new building is being considered for the existing parking lot south of the building (away from the suspected zone of faulting). The proposed structure may consist of an approximately 48,000 square feet, two to four-story building with a slab-on-grade foundation. Plans are not available at the time of this report.

For the purpose of this report, we have included data from our previous study to provide an understanding of the subsurface conditions across the property. Depending on the details of the new structure, an update geotechnical evaluation report will be provided at a later date.

2. SCOPE OF SERVICES

Our geologic services have included the following:

- Planning and coordination of our activities with AOC and review of our previous work.

- A site reconnaissance to evaluate the current conditions and mark out proposed boring locations.
- Coordination with Underground Service Alert to locate underground utilities prior to site excavations. In addition, a utility locator surveyed the locations of proposed exploration for potential conflicts with underground utilities.
- Subsurface exploration utilizing a truck-mounted drill and direct push rigs and a cone penetrometer testing rig. Two small-diameter borings were drilled with a truck-mounted drill rig up to a depth of approximately 51½ feet, two 1¼-inch-diameter borings were continuously cored up to a depth of approximately 52 feet and ten cone penetrometer tests (CPTs) were performed up to a depth of approximately 75 feet south of the existing building.
- Review of subsurface data with our Technical Advisor, Dr. Thomas Rockwell, to evaluate the soil stratigraphy, soil age, and potential for faulting.
- Laboratory testing including moisture-density, percentage of particles finer than No. 200 sieve, Atterberg limits, Proctor density, shear strength and corrosivity.
- Geologic and geotechnical analysis of the field and laboratory data.
- Preparation of this report including our findings and conclusions regarding potential fault rupture hazards.

3. SITE DESCRIPTION

The Hollywood Courthouse is situated on a rectangular property between Carlos Avenue and Hollywood Boulevard (Figure 1). The site latitude and longitude are approximately 34.1023 degrees north and 118.3187 degrees west, respectively (Google, 2014). Topographically, the property generally slopes to the south from an elevation of approximately 407 feet above Mean Sea Level (MSL) adjacent to Carlos Avenue to approximately 395 feet MSL adjacent to Hollywood Boulevard. Surface drainage is currently diverted to storm drain systems.

The property is occupied by a two-story concrete and wood-frame building partially over one-level of underground parking. The finish floor elevation of the building is approximately 402.4 feet MSL (K. Kenshi Nishimoto & Associates, 1984). The parking portion of the structure extends from the northern end of the building to Carlos Avenue with a parking level near the street grade over a lower level that slopes toward the building from a finish surface elevation of

approximately 397 feet MSL to approximately 391 feet MSL (Figure 2). The east and west sides of the building and parking garage are situated along the property lines.

The site of the possible future building is occupied by an asphalt-paved parking lot south of the building and adjacent to Hollywood Boulevard. Adjacent buildings and screen walls are present east and west of the courthouse as well as adjacent to the sidewalk along Hollywood Boulevard. Some landscaping is present in front of the building and within the parking lot near Hollywood Boulevard.

Neighboring properties include residential housing and offices of the Salvation Army to the west and residential properties to the east and north. Commercial properties border Hollywood Boulevard.

4. BACKGROUND

The property was previously used as a parking lot until the time the current building was constructed around 1984 (Historical Aerial Photos, 2015). According to a preliminary soils investigation report prepared by T.K. Engineering Corporation (1984) for the design of the building, the site was vacant at that time. The surface conditions reportedly consisted of broken asphalt concrete pavements and weeds. Based on review of older photographs and topographic maps, no significant structures or grading operations were evident at the site dating back to 1926. Highway 101, north of the site, was constructed sometime between 1952 and 1954. Grading was evident near the north end of the site in connection with the highway grading as well as the future extension of Carlos Avenue to Bronson Avenue (Figure 1). Historically, the neighboring properties were primarily residential with some commercial development along Hollywood Boulevard.

The preliminary soils investigation by T.K. Engineering (1984a) included eight borings up to a depth of approximately 31 feet. Recommendations for deep foundations and remedial earthwork were provided. The investigation did not include a fault hazard evaluation. At that time, the consultant concluded that, based on available geotechnical literature, no active faults were known to be present at the site.

Grading for the project included cuts up to approximately 10 feet along the northern portion of the site and minor cuts and fills along the southern portion of the site (Figure 2). Some remedial earthwork was performed, which included removing and recompacting the near surface soils to a depth of approximately 4 feet (T.K. Engineering, 1984b).

Based on our review of foundation plans prepared by K. Kenshi Nishimoto & Associates (KNA), dated October 9, 1984, the building is supported on 30-inch-diameter piers with grade beams. The parking garage is supported on spread footings. The piers along the southern portion of the building reportedly were designed to extend to depths of approximately 35 feet with an allowable bearing capacity of 123 kips. The spread footings for the garage portion of the building complex were designed for 10-foot-square footings at a depth of approximately 2 feet with allowable bearing capacity of 2,000 pounds per square foot (KNA, 1984).

Based on our research of geotechnical literature at the Los Angeles Department of Building and Safety (LADBS), a geotechnical evaluation was performed by Law/Crandall, Inc. (LCI) for a development west of the site, the results of which were presented in a report dated April 21, 1993. The proposed development was part of a three-phase construction project within the existing Salvation Army facility. The phases included a three-story new youth center, an eight story residential building with grade level parking, and a two-story gymnasium building with a basement and a pool. The geotechnical evaluation included nine borings up to a depth of approximately 50 feet. No detailed fault hazard evaluation was performed. Based on the geologic findings of the geotechnical evaluation, LCI reported that no faults are known to exist at the site (LCI, 1993).

Several fault hazard evaluations have been recently performed by Group Delta approximately 0.4 miles west of the site (Figure 3). Based on the data by Group Delta and additional research, the California Geological Survey (CGS) updated the fault map of the Hollywood Quadrangle. A discussion of the findings by Group Delta and others are presented in Sections 7.4.1 and 7.4.2 of this report.

5. GEOLOGIC CONDITIONS

5.1. Regional Setting

The project site is located along the southern edge of the Hollywood Hills, the eastern extension of the Santa Monica Mountains within the Transverse Ranges, an east-west trending system of mountains that developed in response to north-south compression that began 2.5 to 5 million years ago (Dolan et al., 1997). The mountains exhibit an asymmetric anticlinal structure, which has been interpreted as a fault propagation fold above a gently north-dipping blind thrust fault (Dolan et al., 1997). A series of faults define the southern boundary of the Transverse Ranges including the Hollywood fault. The fault juxtaposes Cretaceous-age basement rock, consisting of quartz diorite and predominantly Miocene volcanic and sedimentary rocks of the Santa Monica Mountains, against Quaternary and Tertiary sedimentary rocks to the south. The Hollywood fault is also the northern boundary of the Hollywood basin, an asymmetric basin structure that is bound on the south by the North Salt Lake fault (CGS, FER 253, 2014a). The base of the mountains in the area of the site, also known as Hollywood Hills, is incised by several drainage tributaries resulting in the deposition of Late Pleistocene to Holocene-aged alluvial fan deposits along the southern flank of the range.

5.2. Geomorphology

A review of topographic maps and aerial photographs dated 1926, 1928, 1931, 1948, 1952, 1954, 1964, 1972, 1977, 1980, 1989, and 1994 was performed to evaluate the geomorphic expression of landforms within and adjacent to the subject property. Features such as lineaments and abrupt changes in topography and/or vegetation were evaluated with regards to their potential of being related to faulting.

The east-west trending uplifted Hollywood Hills dominate the regional geomorphology of the site and vicinity. Older topographic maps (United States Geological Survey [USGS], 1948) show sharp breaks in the topography at the base of the hills north and west of the site indicating the locations of possible fault scarps. Prior to development, the ground surface across the site was relatively flat, sloping gently to the south. No lineaments or indications

of fault related features were observed at the site including the parking lot south of the existing building. A vegetation lineament and/or possible fault scarp was reported by others near the north end of the site along Carlos Avenue (CGS, FER 253, 2014a). In addition, a deflection of a north-south drainage tributary was also reported farther north of the site, as shown on Figure 4 and observed in a 1928 photograph.

Based on our review of photographs dated 1948 and 1952, it appears that around 1952, some grading was being performed for the future extension of San Carlos Avenue and the new highway (US 101). Based on our review of a 1948 topographic map, no clear indication of a fault scarp is evident at the north end of the site.

5.3. Site Geology

The geology of the site is characterized by gently sloping alluvial fan deposits of Holocene age to late Pleistocene age (Figure 5). The alluvial fan deposits are underlain by Tertiary age formational siltstones of the Modelo Formation. The alluvial deposits are expected to be more than 70 feet thick under the site. A detailed description of the alluvial deposits encountered during our field exploration is presented in Section 9; Field Evaluation.

5.4. Groundwater

Groundwater was not encountered during our evaluation, which included borings and CPT soundings up to approximately 75 feet in depth. In addition, groundwater was not encountered in the previous subsurface exploration on site by TK Engineering, which included borings drilled up to depths of approximately 31 feet. Based on review of the State of California Seismic Hazard Evaluation (1998), the historical high groundwater level mapped at the site is 80 feet or more below the ground surface. Data presented by the County of Los Angeles Department of Regional Planning's Safety Element (1990) indicate that perched groundwater and/or the groundwater level may be approximately 30 or more feet below the ground surface. It should be noted that fluctuations in the level of groundwater at the subject site will occur due to variations in ground surface topography, subsurface stratification, rainfall, irrigation practices, and other factors which may not have been evident at the time of our evaluation.

6. FAULTING

6.1. Regional Fault Setting

The site is located in a seismically active area, as is the majority of southern California. Figure 6 shows the approximate site location relative to major faults in the region. The major structural boundary between the Pacific and North American tectonic plates traverses southeast to northwest through California, with the Pacific Plate moving to the northwest relative to the North American plate. Most of this movement occurs along the northwest trending San Andreas fault zone; movement is also accommodated by east-west trending, reverse, oblique-slip and left lateral strike slip faults within southern California, including the Hollywood-Santa Monica fault system. Table 1 lists selected principal known active faults that may affect the site. The maximum moment magnitude (M_{max}) and approximate fault-to-site distances were calculated using the USGS web-based program (USGS, 2008).

Table 1 – Principal Active Faults

Fault	Approximate Fault to Site Distance in miles[1] (km)	Maximum Moment Magnitude[1] (Mmax)
Santa Monica-Hollywood	0.31 (0.50)	7.4
Hollywood	0.53 (0.86)	6.7
Elysian Park	1.4 (2.3)	6.7
Puente Hills	4.9 (7.9)	7.0
Raymond	5.6 (9.0)	6.8
Newport-Inglewood	5.8 (9.3)	7.2
Verdugo	6.1 (9.8)	6.9
Sierra Madre	10.5 (16.9)	7.2
Malibu Coast	12.9 (20.8)	6.7
Northridge	14.7 (23.7)	6.9
Notes: [1] USGS, 2008.		

6.2. Alquist-Priolo Earthquake Fault Zoning Act

As presented in the California Division of Mines and Geology, Special Publication 42, the 1972 Alquist-Priolo Earthquake Fault Zoning Act requires the State Geologist to delineate

"Earthquake Fault Zones" (EFZs) along known active faults in California. The law also requires building setbacks to be established from the trace of an active fault. EFZs must meet the requirements of being "sufficiently active" (evidence of movement within the last approximate 11,000 years) and "well-defined" (detectable by a trained geologist). It is known that faults often rupture along a complex zone that may include the movement of multiple splays/strands rather than of a single strand. The EFZs are intended to be sufficiently wide enough on both sides of a known active fault to include these known or unknown splays/strands of the fault. The purpose of the act was to prohibit the location of most structures for human occupancy across the traces of active faults, thus mitigating the hazard of fault rupture.

6.3. Historic Earthquakes

In historic times, no large earthquakes have occurred within the Los Angeles Basin that have been attributed to the Hollywood fault. Some of the more significant events within 100 kilometers of the site are listed below.

- In December 1812, a magnitude 7.3 earthquake occurred along the San Andreas fault between Pallet Creek and Wrightwood, approximately 42 miles northeast of the site, and may have extended to San Bernardino. The northern part of this section of fault ruptured again in 1857, with rupture from Parkfield southeast to about the I-15.

- On March 10, 1933, a magnitude 6.4 earthquake, "the Long Beach Earthquake," occurred offshore of Newport Beach along the Newport Inglewood fault (approximately 33 miles south of the site) (Hauksson and Gross, 1991). Over 200 aftershocks, generally magnitude 4.0 or less, followed the main event. The earthquake resulted in approximately 115 deaths and 40 million dollars of damage (USGS, 1993). This event resulted in the passing of the Field and Riley Acts of the California State Code for the design and construction of school structures and buildings larger than two-family dwellings, respectively.

- A magnitude 6.6 earthquake occurred on February 6, 1971 in San Fernando (approximately 22 miles northeast of the site) resulting in over 505 million dollars in losses and many changes in the building codes.

- On October 1, 1987, a magnitude 6 earthquake occurred in the Whittier Narrows area (approximately 14 miles southeast of the site) resulting in 358 million dollars in losses.

- On January 17, 1994, a magnitude 6.7 earthquake occurred in Northridge (approximately 15 miles northwest of the site) with 57 dead, more than 9,000 injured and about 40 billion dollars in property damage.

6.4. Hollywood Fault

The Hollywood fault extends approximately 9 miles (14 km) through Beverly Hills, West Hollywood and Hollywood to the Los Angeles River. The fault is truncated on the west by the north-northwest trending West Beverly Hills Lineament, which includes a left-step of approximately ¾ miles (1.2 km) between the Santa Monica fault and the Hollywood fault (Dolan et al., 2000). In the Los Angeles River floodplain, the fault is defined by a steep gravity gradient and steep drop in groundwater levels as the fault trends eastward toward the Raymond Fault (CGS, 2014a). The Hollywood fault contains five segments (Figure 7). The subject site is in an area near overlapping Segments 2 and 3, where there is a left (releasing) step-over between Segments 2 and 3 resulting in a pull-apart or sag between the two segments.

The Hollywood fault is an active sinistral-reverse oblique strike slip fault with an average attitude of N76°E and dips ranging from 25 to 90 degrees to the north. A slip rate of 1 to 5 millimeters per year has been assigned to this fault (USGS, 2014b). Based on previous work by others, the Hollywood fault could produce an earthquake with a magnitude on the order of 6.7, or larger if it ruptures with the Santa Monica and/or Raymond faults. Geologic data suggests that the last movement along the fault was approximately 7,000 years ago (Dolan, et al., 2000). A probable minimum oblique-slip rate has been assumed at approximately 0.35 millimeters per year for the Hollywood fault, which yields a recurrence interval of approximately 4,000 years (Dolan, et al., 1997) if the fault ruptures on its own. No historical movement (less than 200 years) has been recorded on this fault.

The Santa Monica-Hollywood fault zone is a significant fault system that has long been recognized along the base of the Santa Monica Mountains. Due to dense urbanization, however, the location and activity of the fault system has been uncertain and subject to debate. Until recently, there was insufficient data for the CGS to classify the Hollywood

fault as an active EFZ. Based on recent studies, the Hollywood fault has been mapped by the State of California (2014) as an EFZ (Figure 8). A brief description of the recent fault studies is presented below.

6.4.1. Group Delta

Exploration of possible faulting at four potential building sites near the intersection of Argyle Avenue and Yucca Street was performed by Group Delta during the period of 2013 to 2014. Based on available data from the LADBS, the exploration consisted of several fault trenches up to approximately 35 feet in depth and cone penetrometer testing and continuous cores up to a depth of approximately 60 feet to evaluate for the presence and activity of faults. The reports by Group Delta (referenced) indicated various soil units within Holocene age alluvium overlying older (Pleistocene age) alluvial deposits and/or Tertiary age sedimentary deposits with some faulting within the older alluvium. Based on the detailed logging of the trenches and soil-age assessments, the upper Holocene age alluvial deposits extending to depths of approximately 27 to 30 feet were reportedly unbroken (Group Delta, 2014a). The age of the unbroken sediments were considered to be 12,000 to 15,000 years old. Group Delta concluded that faulting at these sites was considered to be older than 12,000 years old. Data presented by others farther west of these sites indicated the age of the younger alluvium of approximately 20,000 years old at depths ranging from approximately 21 feet to 38 feet below the ground surface (Dolan and others, 1997 and 2000).

6.4.2. California Geological Survey FER 253

The Hollywood fault was previously evaluated for Holocene age active faulting as part of a 1977 study (Smith, 1978). At that time, the study concluded that there was insufficient evidence of Holocene faulting to recommend fault traces for zoning. Based on subsequent geologic and geotechnical studies, as well as paleoseismic and geomorphic studies by Dolan et al. (1997), Dolan et al. (2000), and other research, CGS re-evaluated evidence of Holocene displacement along traces of the Hollywood fault. Accordingly, CGS prepared Fault Evaluation Report 253, dated February 14, 2014. The

purpose of the report was to assess the location and activity of fault strands along the Hollywood fault within the Hollywood 7½ minute quadrangle. At that time, the faults determined to be sufficiently active (Holocene) and well-defined were zoned by the State Geologist as directed by the A-P Act of 1972 (Hart and Bryant, 2007). Prior to the report, CGS issued a preliminary fault map for public comment on January 8, 2014 showing the recommended Alquist-Priolo Earthquake Fault Zone (APEFZ) for the Hollywood quadrangle. Although the subject site was partially located within the zone, no traces of an active fault were mapped across the site at that time.

On November 5, 2014, a supplement was prepared to FER 253. The purpose of the supplement was to review and address the public comments as well as to review additional reports issued to CGS after the preparation of FER 253. The additional reports included the work Group Delta performed in the area west of the site. Based on the additional review, CGS revised the APEFZ map for the Hollywood quadrangle. The edge of the mapped zone clips a very small edge of the northwest side of the site (Figure 8).

6.4.3. Ninyo & Moore

Ninyo & Moore previously performed a fault rupture hazard evaluation for the portion of the lot underlying the existing building (Ninyo & Moore, 2015a). The evaluation included four continuous cores and 14 CPTs up to a depth of approximately 74.2 feet within the interior of the west side of the building. Our previous subsurface exploration indicated that the site is underlain by generally gently-sloping stratigraphy with distinct depositional sequences that were repeated in each continuous core and CPT. However, the soil stratigraphy near the Holocene-Pleistocene contact included several discontinuities that suggest the possible presence of faulting beneath the existing building. A graben type structure with vertical offsets in the soil layers of up to approximately 3 feet is present near the center of the building complex between the 2-story building and the parking garage (Figures 9 and 10). Minor vertical offsets in the soil layers were also observed south of the graben structure. Due to the limited nature of

our evaluation, we were unable to evaluate for the possibility of horizontal displacements along these possible faults.

Based on our evaluation, there may be a potential for surface rupture to occur in the existing building area if the observed steps in stratigraphy are a result of faulting. Existing published data indicate that the Hollywood fault occurs as a series of short segments with step-over zones between the ends of individual segments. The subject site is located near the eastern end of Segment 2 of the fault, where the displacement along the fault is not considered to be as significant compared to displacement in the middle part of a segment, as is present to the west and north of the site. The data suggest that faulting, if present at the site, was probably associated with events near the late Pleistocene to early Holocene period.

7. FIELD EVALUATION

In order to further evaluate the presence of faulting south of the building, we performed a subsurface evaluation utilizing direct push 1.75-inch-diameter continuous cores and CPTs at a spacing generally of approximately 12 feet along the west side of the property. The purpose of our subsurface evaluation was to: 1) evaluate the stratigraphy across the site for the possible presence of faulting, and 2) evaluate the subsurface soil and geologic conditions for the proposed building.

Our subsurface evaluation was conducted on May 11 and 12, 2015 and consisted of the drilling, logging, and sampling of two small-diameter borings to depths of approximately 51½ feet on the east side of the property, two direct push continuous cores to depths of approximately 52 feet and ten CPTs to depths ranging from approximately 75.1 to 75.8 feet along the west side of the parking lot, south of the building. The direct push continuous cores were located adjacent to a CPT location to aid in evaluating the stratigraphy and relative age of the soils.

Prior to the subsurface exploration, the exploratory locations were surveyed for potential utility conflicts. In addition, elevations at each exploratory location were checked with a manometer relative to an assumed elevation at a previous CPT location inside the building of 402.4 feet

MSL. The locations of each exploratory location were measured with a measuring tape from the south edge of the building. Logs of the exploratory borings and cores are presented in Appendix A. Logs of the CPTs are presented in Appendix B. The approximate locations of the borings and CPTs as well as the previous borings and CPTs are presented on Figure 9. For the purpose of this report, we have numbered the borings, cores and CPTs in a consecutive sequence to our previous borings, cores and CPTs.

Laboratory testing was performed to evaluate in-place moisture and density, percent of materials finer than the No. 200 sieve, Atterberg limits, Proctor density, direct shear strength, and soil corrosivity. Our laboratory test results are presented on the boring logs in Appendix A and in Appendix C.

The cores were logged by our certified engineering geologists. After the field exploration, core samples and CPT logs were reviewed with Dr. Rockwell (paleoseismologist and professor of geology, SDSU) to evaluate the stratigraphy and age of soils. Direct push core samples were obtained at 4-foot intervals to provide relatively continuous lithology data. The percent recovery of the cores varied from approximately 33 to 100 percent. The CPTs provided a continuous profile of tip resistance and sleeve friction, which are correlated to general soil types. The CPT profiles were used to correlate the soil units underlying the site.

7.1. Geologic Units

The materials encountered during the subsurface exploration generally consisted of three geologic units; Fill soil, Holocene age alluvium and Pleistocene age alluvium. Brief descriptions of the units are presented below.

7.1.1. Fill

Fill soils were encountered in borings B-3 and B-4 and in cores C-5 and C-6 to a depth of approximately 4 feet. The fill soils were generally composed of brown, moist, loose, silty sand with scattered minor construction debris including brick fragments. The fill soils were generated during the prior grading and development of the property. Based on the material type and a compaction report by T.K. Engineering, dated December 3,

1984, the source of the fill soils were from on-site remedial excavations. According to the report, up to approximately 6 feet of fill is present at the site. The fill soils were reportedly compacted to 90 percent relative compaction.

7.1.2. Holocene age Alluvial Deposits

Holocene (younger) alluvial deposits were encountered in each boring and core location to depths ranging from approximately 39 to 41 feet. The younger alluvial deposits generally consisted of two subunits. In our previous report, we had included a third sub-unit (Subunit 3), which we now interpret to be the upper unit associated with the buried Pleistocene deposits. This change in interpretation is based on better core recovery in this evaluation which has allowed for a better analysis of the subsurface soils. Brief descriptions of the subunits are presented below.

Subunit 1: Subunit 1 consists predominantly of thinly to crudely bedded, dark yellowish brown, moist, loose to medium dense, clayey and silty, fine- to coarse-grained sand and firm to stiff, sandy clay. Subunit 1 extended to depths of approximately 26 to 28 feet below original grade and exhibits scattered crude stratification.

Subunit 2: Subunit 2 consists predominantly of massive yellowish to dark yellowish brown, moist, loose to medium dense, medium to coarse grained, poorly graded sand with silt and gravel with interbedded clayey sand and sandy clay. Subunit 2 ranged in thickness from approximately 10 to 12 feet.

The age estimated for the younger alluvium was based on our review of samples and prior experience with soil age dating in the Los Angeles region; there were no recognizable soil horizons observed in these upper deposits at the locations explored except for the possible presence of some discontinuous and weakly formed horizons. In addition, carbon material or other datable material was not present in the younger alluvial sediments encountered. It is possible that weakly expressed soil horizons may have been present and not recovered in some cores, as core recovery was not 100 percent. Nevertheless, the absence of significant soil development along with reported

thick Holocene alluvium west of the site (Dolan et al., 2000 and Group Delta, 2014) strongly suggests that the upper 39 to 40 feet of alluvium is Holocene in age, with the possibility that the lowest portions are latest Pleistocene in age.

7.1.3. Pleistocene Age Alluvial Deposits

Pleistocene (older) alluvial deposits were encountered underlying the younger alluvium at each boring and core location to the depths explored. The older alluvium encountered on site was generally comprised of dark yellowish, strong brown and dark brown, moist, very stiff to hard sandy clay with interbeds of clayey and silty sand to the depths explored.

The unconsolidated (Holocene age) alluvial deposits cap two buried soil profiles that represent substantial periods of non-deposition and surface exposure. Both soil profiles have similar characteristics, indicating that they may represent similar amounts of time in terms of surface exposure. These soil profiles were described and evaluated to estimate the age of the materials. Portions of the buried soil horizons, however, had been eroded or degraded. Accordingly, the following composite soil description of the soils generally encountered in the previous cores C-2 and C-3 are presented below. Similar soils were observed in the recent cores C-5 and C-6. The purpose of the composite description is to provide a more representative description of the soil sequence at the site for age purposes.

Subunit 3 in our previous report is now recognized as the buried A horizon associated with the top of the Pleistocene strata, and consists predominantly of massive, dark yellowish brown, moist, medium dense to dense, fine to medium grained, clayey sand and stiff, sandy clay. Unit 3 ranged in thickness from approximately 1 to 2 feet in cores C-5 and C-6.

Table 2 – Composite Description of Buried Soil Horizons

Thickness (ft)	Horizon	Description
1.2-1.5	1Ab	Dark brown to brown (7.5YR 4/3m, 7.5-10YR4/4d) color; clay loam texture; massive breaking to moderate, coarse subangular blocky structure; extremely hard dry consistence (compacted), very plastic and very sticky wet consistence; no clay films observed; clear, smooth boundary to:
3-4	1Btb	Strong brown (7.5YR 4/6m, 5/5d) color; sandy clay loam texture; massive breaking to moderate, coarse subangular blocky structure; extremely hard dry consistence, very plastic and very sticky wet consistence; many moderately thick to thick clay films in pores; common moderately thick clay films on ped faces, common thin clay films as bridges between grains; gradual to clear, smooth boundary to:
0.7-2	1BCb	Dark yellowish brown (10YR 4/4m, 6/4d) color; sandy loam texture; massive breaking to weak, coarse subangular blocky structure; slightly hard dry consistence, slightly plastic and slightly sticky wet consistence; few to common thin clay films in pores and very few thin clay films on ped faces; stage II $CaCO_3$ as pore linings and clast coatings with few nodules (<1 cm) in lower part of horizon (Bkb horizon); abrupt, smooth boundary to: Note: The 1BCb horizon was not encountered in all cores, as some cores encountered a thicker 1Btb overlying the calcic Bkb horizon. In these cases, the 1Btb horizon is as much as 4 feet thick.
0.5	2Ab	Brown to dark brown (10YR 4/3m, 6/3d) color; sandy loam texture; extremely hard dry consistence, slightly sticky and slightly plastic wet consistence; no clay films; many random, tubular pores; clear to abrupt, smooth boundary to:
>5	2Btb	Dark brown to brown (7.5YR 4/4m, 7.5-10YR 5/6d) color; sandy clay loam texture; massive breaking to strong, coarse subangular blocky to angular blocky structure; extremely hard dry consistence, very sticky and very plastic wet consistence; continuous, thick clay films in pores, common to many thin to moderately thick clay films on ped faces; boundary not observed:

The upper buried soil (unit 1 in Table 2) which is collectively developed in about 6.5 feet of alluvium is characterized by a reddened A (relic topsoil) and Bt (argillic) horizons, with the average mixed moist color in the argillic horizon reaching 7.5YR 4/6. The color, along with the sandy clay loam texture and abundance and thickness of clay films, indicates that this is a well-developed soil that classifies as a Palexeralf. Similarly developed soils in southern California have been dated to the late Pleistocene and are typically on the order of 100,000 years in age, or older. This soil is similar in description to soils developed on fluvial terraces in Orange County that correlate to the 120,000 year-old MIS 5e marine terrace (Rockwell, unpublished data), and weaker soils in Los

Angeles basin have been dated to about 55,000 years in age (McFadden and Weldon, 1985).

A particular characteristic of the upper buried soil suggests a slightly older age for the actual deposition of the alluvium. The lower part of the profile exhibits secondary calcium carbonate accumulation that typically only occurs in arid to semi-arid regions with low rainfall. Secondary carbonate has been noted in some Holocene Los Angeles basin soils at some distance from the coast, but all post 100,000 year-old soils in coastal southern California are typically devoid of secondary carbonate. This is believed to be because the late Pleistocene climate of southern California was colder and wetter than the present climate (Huesser, 1978 and many other studies by the same author), with conifer forests growing throughout the coastal region until early Holocene time. The implication is that secondary calcium carbonate could not have formed in well-drained soils in late Pleistocene time in Los Angeles basin, consistent with known observations. The last time that secondary carbonate may have formed in the Los Angeles basin is during the last interglacial, between 130,000 and about 115,000 years ago, during which time, the climate in southern California may have been warmer and dryer than at present. The observation of secondary carbonate in the upper buried soil therefore implies that this soil experienced the warm, dry conditions of the last interglacial period. Consequently, the age of the older alluvium is best interpreted as pre-dating the last interglacial and was probably deposited during the waning phases of MIS 6. Thus, we estimate the age of the upper buried alluvium to be in the range of 130,000 to 160,000 years old.

The lower buried soil exhibits similar characteristics to the upper buried soil, although the color is slightly less red (7.5YR 4/4m). The texture and clay film abundance are similar to the upper buried soil, as are the structure and consistence characteristics. As a rough estimate of age, we consider the lower buried soil to have been exposed for a similar length of time as the upper buried soil, suggesting an age as old as 300,000 years for deposition of the lowest deposits exposed in the cores.

7.2. Site Stratigraphy

In order to evaluate the stratigraphy of the alluvial sediments on site, we utilized borings, direct push cores and cone penetrometer tests. Specific soil layers were evaluated for continuity between exploratory locations. Due to the variable recovery percentages (33 to 100 percent) in the cores, the CPTs were more valuable in providing a relatively clear connectivity between exploratory locations. The CPT profiles indicated four distinct stratigraphic layers that were repeated in each CPT. The stratigraphic layers were correlated with the materials encountered in the cores at or near the respective depths in the CPTs. In addition, we evaluated the vertical inclination of the CPTs and corrected the plots, as appropriate, to compensate for deviation of the inclination of the CPT probe. Our interpretation of the stratigraphy in the parking lot south of the building is presented on Figure 11, which includes the corrected plot of the CPTs as well as a previous CPT and boring from our previous evaluation.

Based on our review of the core samples and CPT logs, two of the four distinct stratigraphic layers are within the younger Holocene alluvial deposits. The third layer represents the top of the Pleistocene section (Ab and upper part of the clayey Btb horizons) and the fourth layer comprises the lower gravelly sand part of the upper buried soil along with the older lower Pleistocene alluvial deposits and buried soil. The younger layers are generally sloping to the south at approximately 2 to 3 degrees. The younger layers are relatively continuous with distinct contacts with the underlying materials. No discontinuities were observed in the younger layers or at the contact with the Pleistocene age alluvial deposits.

8. FINDINGS AND CONCLUSIONS

The property is situated near the southern edge of the Hollywood fault zone, where the fault has been mapped with a left-step over to the north of the site. The parking lot along the south side of the property is not within the mapped APEFZ of the Hollywood fault (Figure 8). The purpose of our study was to provide the AOC with an assessment of fault rupture hazard that could potentially impact the construction of a new building along the south side of the property, and to provide supplemental recommendations for the proposed improvements, if appropriate.

The Hollywood fault is an active sinistral-reverse oblique strike slip fault trending N76E. Based on previous work by others, the Hollywood fault could produce an earthquake with a magnitude on the order of 6.6, or larger if it fails with the Santa Monica and/or Raymond faults. Geologic data suggests that the last movement along the fault was approximately 7,000 years ago (Dolan, et al., 2000). A probable minimum oblique-slip rate has been estimated at approximately 0.35 millimeters per year for the Hollywood fault, which yields a recurrence interval of approximately 4,000 years (Dolan, et al., 1997) if the fault ruptures on its own. No historical movement (less than 200 years) has been recorded on this fault.

Geologic evidence indicates that faults typically rupture repeatedly along existing fault planes; therefore, the risk for fault rupture hazard is higher for sites located over the trace of an active fault. Fault rupture may occur in previously unfaulted areas; however, the potential is less. Generally, the risk of fault rupture decreases the farther away a site is from an active fault.

Based on our previous and current evaluations, the younger alluvial soils are up to approximately 39 to 40 feet deep. Our scope included a combination of direct push cores and CPTs at a spacing of approximately 12 feet along the western side of the property in a north-south direction. The traverse of the cores and CPTs were along the same trend as our previous study to allow correlation of the stratigraphy across the property. As a result of the type of exploration, our work was limited to a two-dimensional evaluation of the underlying soil and geologic conditions.

Based on the results of our supplemental fault rupture hazard evaluation, it is our opinion that no active (Holocene age) faults cross the southern portion of the subject property (parking lot) nor are faults recognized at depth on the older Pleistocene deposits beneath the southern portion of the property. Furthermore, it is our opinion that the risk of future fault rupture within the design life of the project is low and building setbacks are not warranted. The bases for our opinions are summarized below.

- Our current subsurface exploration indicates that the parking lot is underlain by gently-sloping stratigraphy with distinct depositional sequences of younger alluvial soils that were repeated in each continuous core and CPT. No offsets were observed in the younger alluvial soils or along the contact with the older alluvial soils with estimated ages of 130,000 years or more.

- No geomorphic evidence such as lineaments, scarps, troughs and depressions was observed in the area of the parking lot or trending through the site from neighboring properties in topographic maps and aerial photographs dating back to 1925.

- The area of the possible future building is not mapped in an Earthquake Fault Zone by the California Geological Survey (California Geological Survey, 2014).

- Existing published data indicate that the Hollywood fault occurs as a series of short segments with step-over zones between the ends of individual segments. The subject site is located near the eastern end of Segment 2 of the fault, where the displacement along the fault is not considered to be as significant compared to displacement in the middle part of a segment, as is present to the west and north of the site (Ninyo & Moore, 2015a).

- Our previous subsurface evaluation indicated possible faulting near the center of the existing building. Based on the orientation of the Hollywood fault as observed by others, the possible faulting would not trend toward the parking lot south of the building.

9. GEOTECHNICAL EVALUATION

We previously performed a geotechnical evaluation for a proposed 5,000 square foot building addition to the south side of the courthouse, the results of which were presented in our report dated March 6, 2015. As indicated previously, the existing two-story portion of the building on the south side is supported on caissons and the parking garage on the north side is supported on spread footings. In order to preclude the potential differential settlement resulting from a mixed foundation condition between the existing and new foundations, we previously recommended that the previously proposed building addition along the south side of the building be supported on deep foundations.

Our current scope of work included small diameter borings and laboratory testing to evaluate the soil and geologic conditions for the purpose of providing design recommendations for a possible new building in the parking lot. Based on the results of our current subsurface evaluation, laboratory testing, and data analysis, the proposed new building is feasible from a geotechnical standpoint. The recommendations presented in our previous report generally remain applicable for the new building. Depending on the size and type of new building, recommendations for spread footings should be considered. We recommend that an update geotechnical evaluation report be provided based on further details regarding the proposed construction such as building

size, location and elevation. Additional borings and laboratory testing as well as supplemental recommendations may be appropriate.

10. LIMITATIONS

The field evaluation, laboratory testing, and geologic analyses presented in this report have been conducted in general accordance with current practice and the standard of care exercised by geologic consultants performing similar tasks in the project area. No warranty, expressed or implied, is made regarding the conclusions, recommendations, and opinions presented in this report. There is no evaluation detailed enough to reveal every subsurface condition. Variations may exist and conditions not observed or described in this report may be encountered during construction.

Our conclusions, recommendations, and opinions are based on an analysis of the observed site conditions. If geotechnical conditions different from those described in this report are encountered, our office should be notified, and additional recommendations, if warranted, will be provided upon request. It should be understood that the conditions of a site could change with time as a result of natural processes or the activities of man at the subject site or nearby sites. In addition, changes to the applicable laws, regulations, codes, and standards of practice may occur due to government action or the broadening of knowledge. The findings of this report may, therefore, be invalidated over time, in part or in whole, by changes over which Ninyo & Moore has no control.

This report is intended exclusively for use by the client. Any use or reuse of the findings, conclusions, and/or recommendations of this report by parties other than the client is undertaken at said parties' sole risk.

11. REFERENCES

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AERIAL PHOTOGRAPHS

Source	Date	Flight	Numbers	Scale
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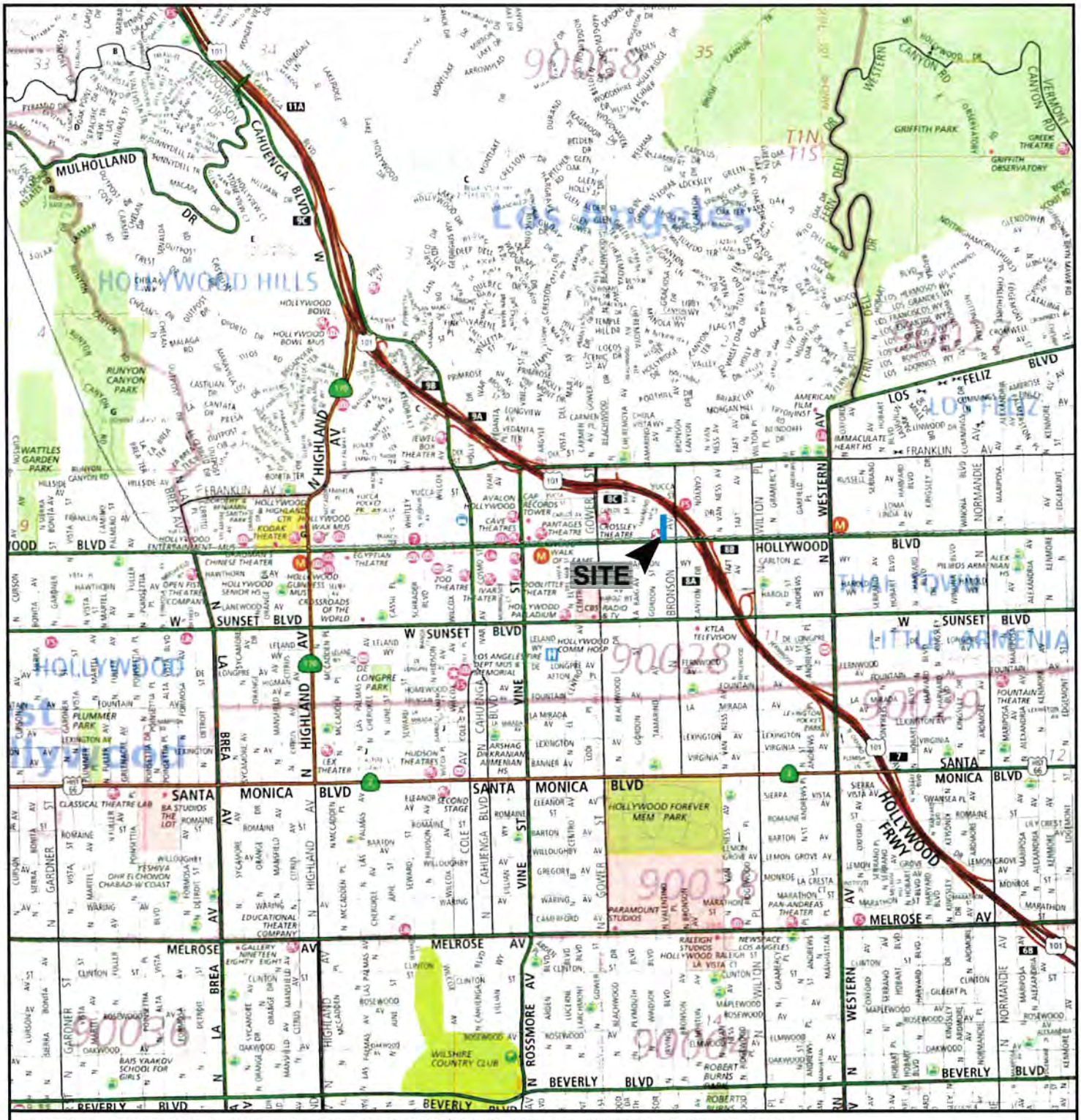
USDA	10-27-54	AXJ-20K	45 and 46	1: 20,000



REFERENCE: 52ND EDITION, THOMAS GUIDE FOR LOS ANGELES/ORANGE COUNTIES, STREET GUIDE AND DIRECTORY.

N

SCALE IN FEET

0 2,400 4,800

NOTE: DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE.

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Ninyo & Moore

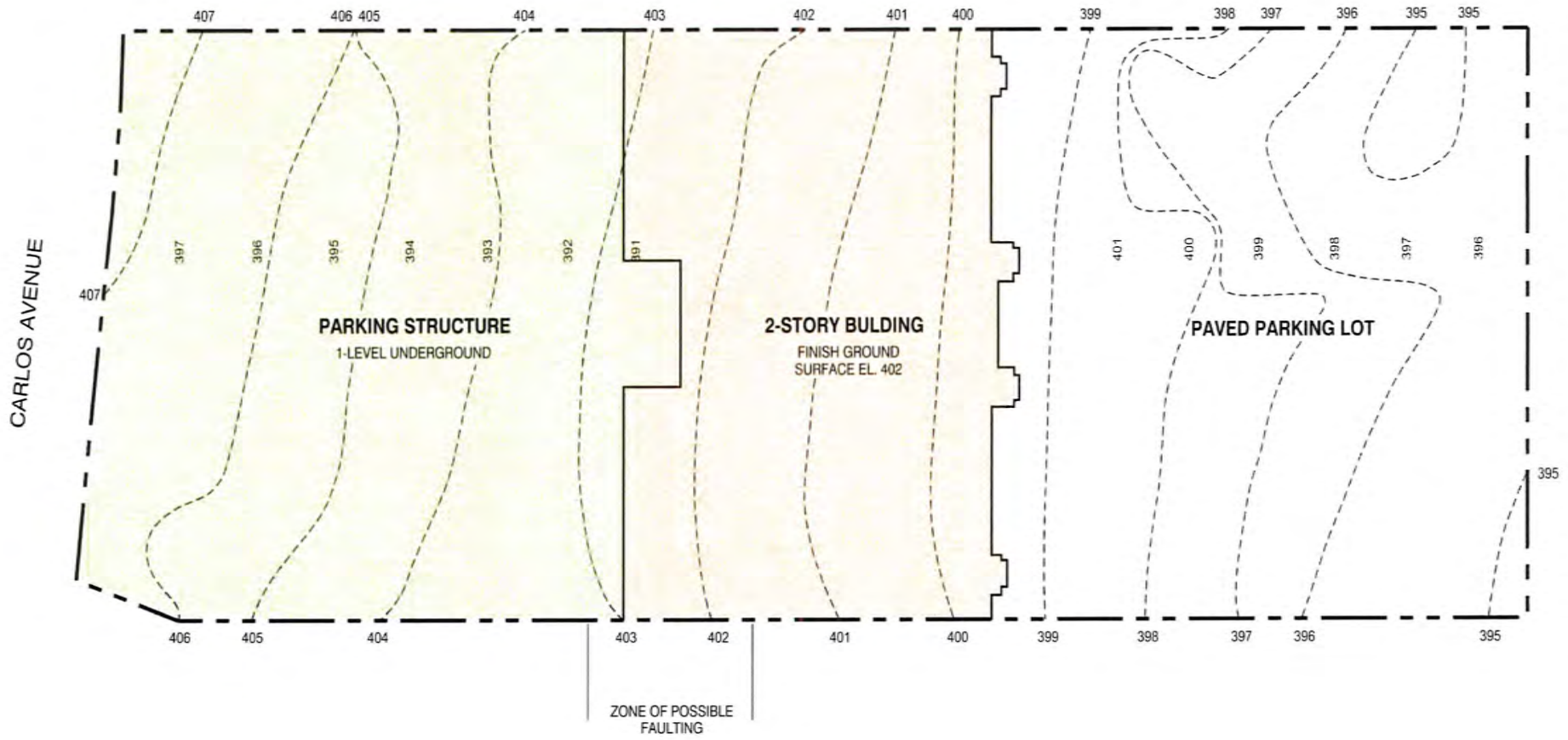
PROJECT NO.	DATE
402132007	6/15

SITE LOCATION

HOLLYWOOD COURTHOUSE
5925 HOLLYWOOD BOULEVARD
LOS ANGELES, CALIFORNIA

FIGURE

1



LEGEND

--- 407 --- PRE-EXISTING GROUND SURFACE ELEVATION (1984)

397 FINISHED SURFACE ELEVATION; IN AREA OF PARKING GARAGE, ELEVATION SHOWN AS LOWER LEVEL

N

SCALE IN FEET

0 30 60

NOTE: DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE.

REFERENCE: K KENSHI NISHIMOTO ASSOCIATES, 1984, HOLLYWOOD MUNICIPAL COURT, ROUGH GRADING PLAN AND SECTIONS, SHEET C-2, DATED OCTOBER 9.

Ninyo & Moore

PROJECT NO. 402132007

DATE 6/15

SITE PLAN

HOLLYWOOD COURTHOUSE
5925 HOLLYWOOD BOULEVARD
LOS ANGELES, CALIFORNIA

FIGURE 2

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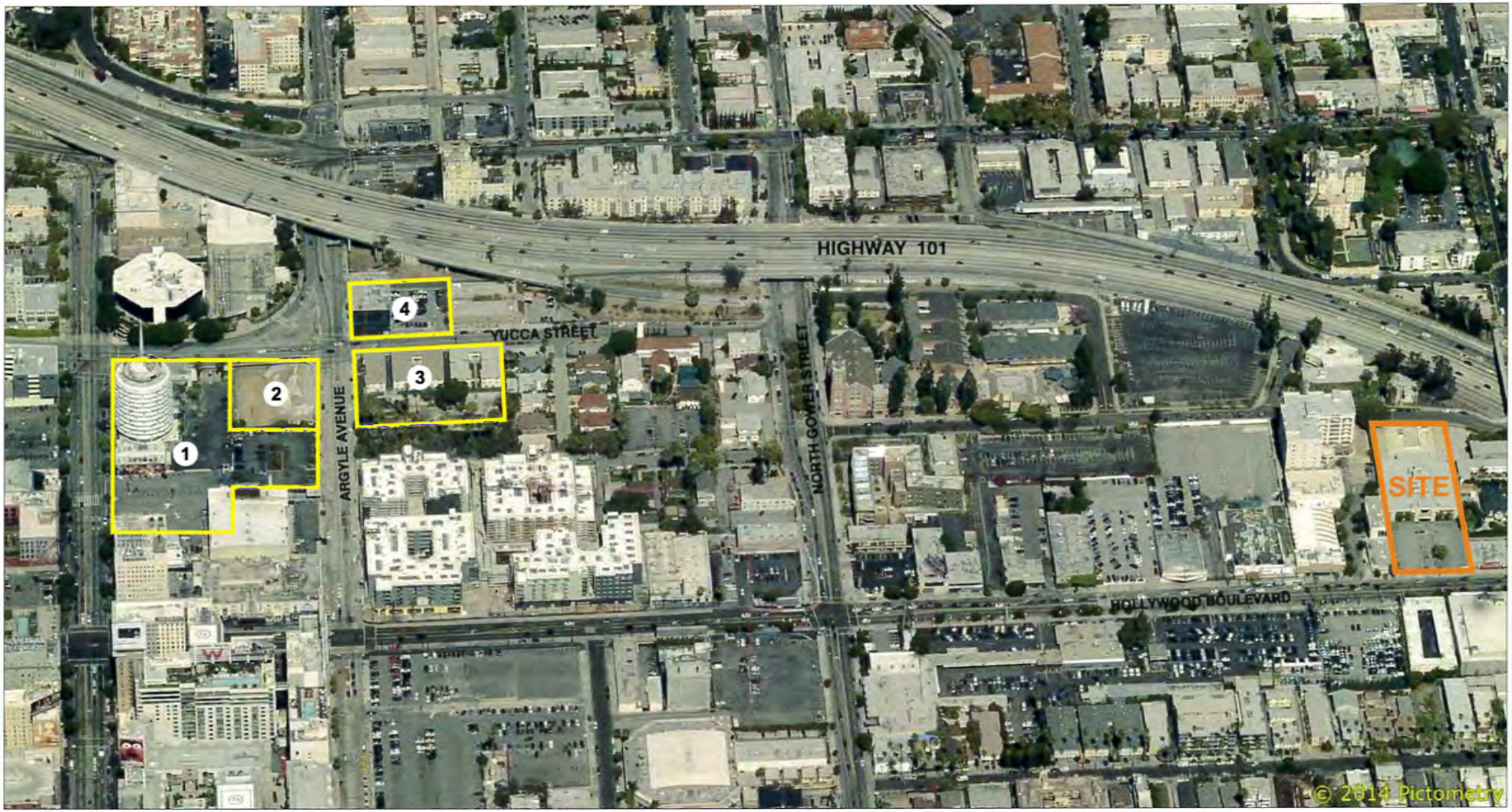

REFERENCE: PICTOMETRY.COM

LEGEND

- PROPERTY WHERE FAULT STUDIES PERFORMED
- (1) GROUP DELTA (9/3/2014)
- (2) GROUP DELTA (9/3/2014)
- (3) GROUP DELTA (9/7/2014)
- (4) GROUP DELTA (9/3/2014)

N

NOT TO SCALE

NOTE: DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE.

Ninyo & Moore		FAULT STUDIES	FIGURE
PROJECT NO.	DATE	HOLLYWOOD COURTHOUSE 5925 HOLLYWOOD BOULEVARD LOS ANGELES, CALIFORNIA	3
402132007	6/15		

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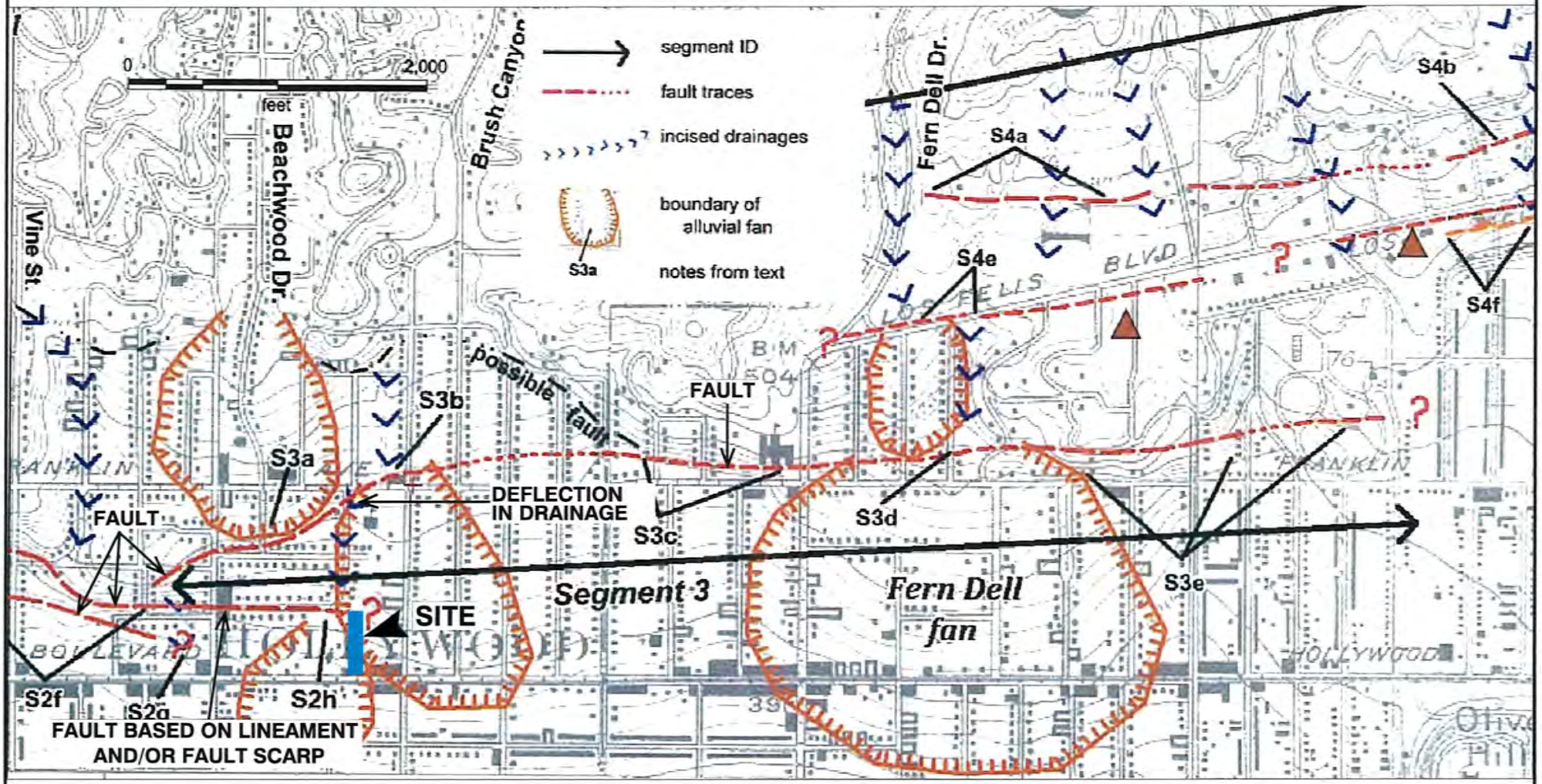

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SCALE IN FEET

0 1,000 2,000

NOTE: DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE.

REFERENCE: CALIFORNIA GEOLOGICAL SURVEY FAULT EVALUATION REPORT 253, DATED FEBRUARY 14, 2014.

Ninyo & Moore	GEOMORPHIC FEATURES	FIGURE
PROJECT NO. 402132007 / DATE 6/15	HOLLYWOOD COURTHOUSE 5925 HOLLYWOOD BOULEVARD LOS ANGELES, CALIFORNIA	4

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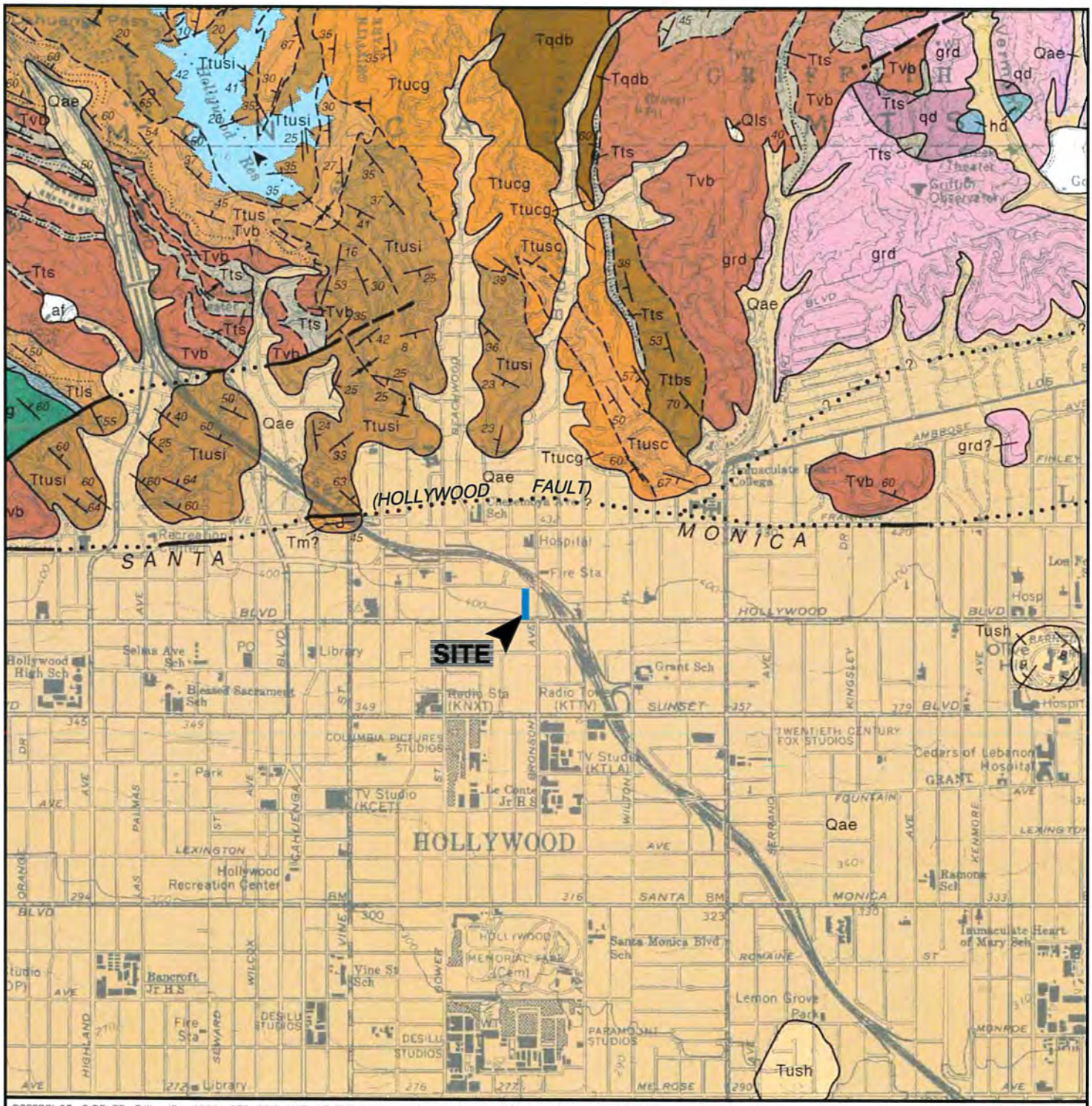

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NOTE: DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE.

Ninyo & Moore	REGIONAL GEOLOGY	FIGURE
PROJECT NO. 402132007 / DATE 6/15	HOLLYWOOD COURTHOUSE 5925 HOLLYWOOD BOULEVARD LOS ANGELES, CALIFORNIA	5

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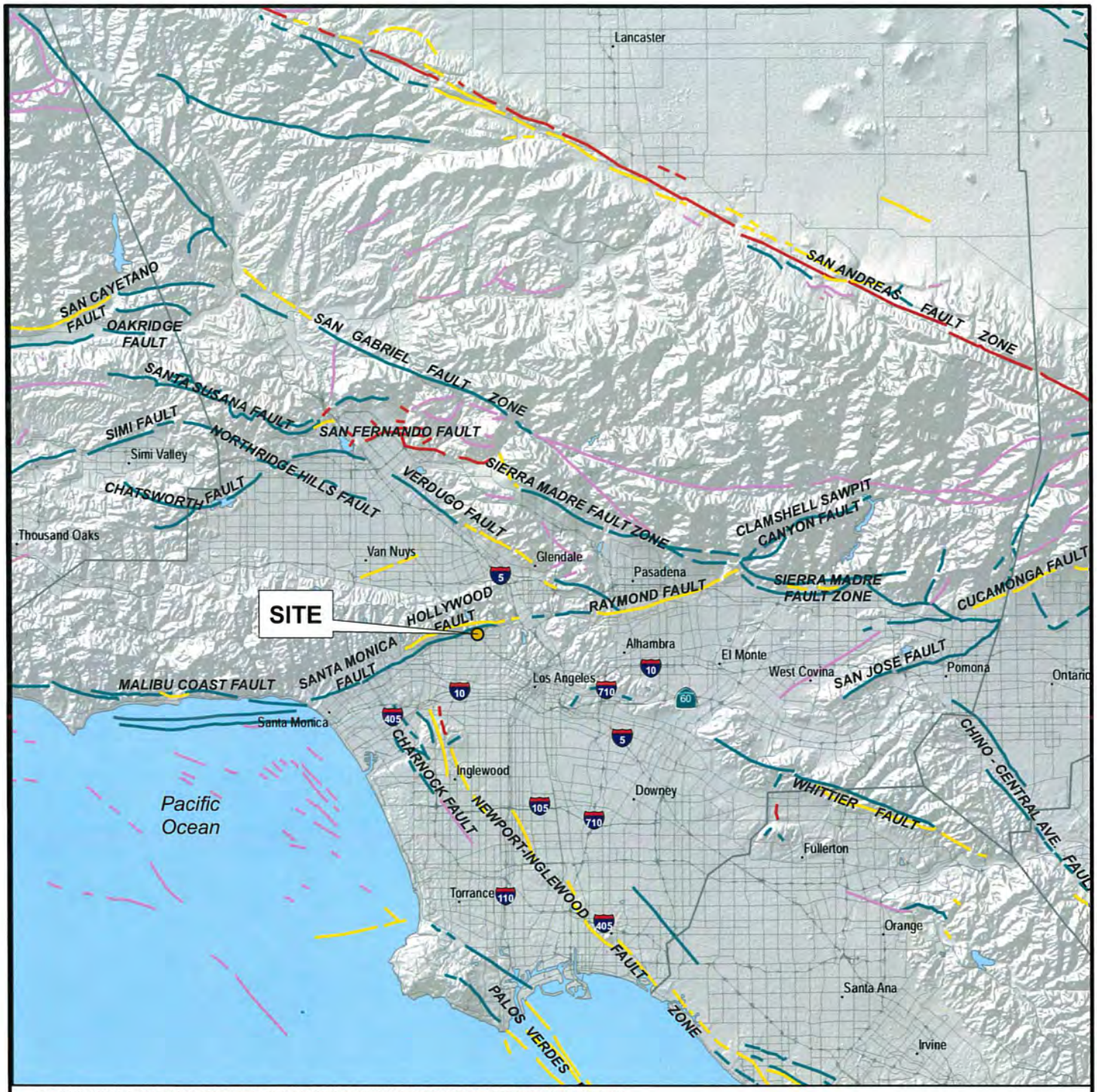

GIS DATA SOURCE: CALIFORNIA GEOLOGICAL SURVEY (CGS); ENVIRONMENTAL SYSTEMS RESEARCH INSTITUTE (ESRI)
REFERENCE: JENNINGS, 2010, FAULT ACTIVITY MAP OF CALIFORNIA.

LEGEND

FAULT ACTIVITY:

- HISTORICALLY ACTIVE
- HOLOCENE ACTIVE
- COUNTY BOUNDARIES
- LATE QUATERNARY
- QUATERNARY

N

10 0 10

Miles

NOTE: DIMENSIONS, DIRECTIONS, AND LOCATIONS ARE APPROXIMATE

Ninyo & Moore		FAULT LOCATIONS	FIGURE
PROJECT NO.	DATE	HOLLYWOOD COURTHOUSE 5925 HOLLYWOOD BOULEVARD LOS ANGELES, CALIFORNIA	6
402132007	6/15		

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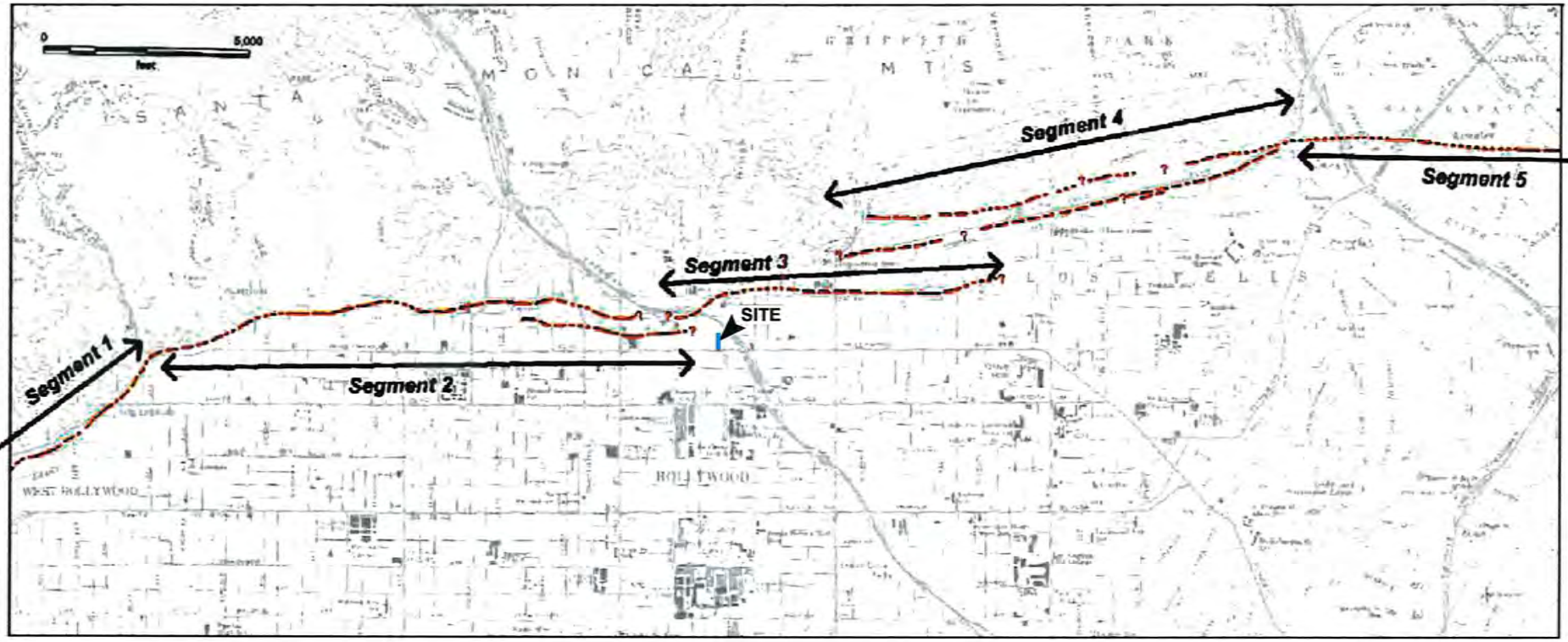

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SCALE IN FEET

0 4,000 8,000

NOTE: DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE.

REFERENCE: CALIFORNIA GEOLOGICAL SURVEY, 2014, FAULT EVALUATION REPORT 253, DATED FEBRUARY 14.

Ninyo & Moore		FAULT SEGMENTS	FIGURE
PROJECT NO.	DATE	HOLLYWOOD COURTHOUSE 5925 HOLLYWOOD BOULEVARD LOS ANGELES, CALIFORNIA	7
402132007	6/15		

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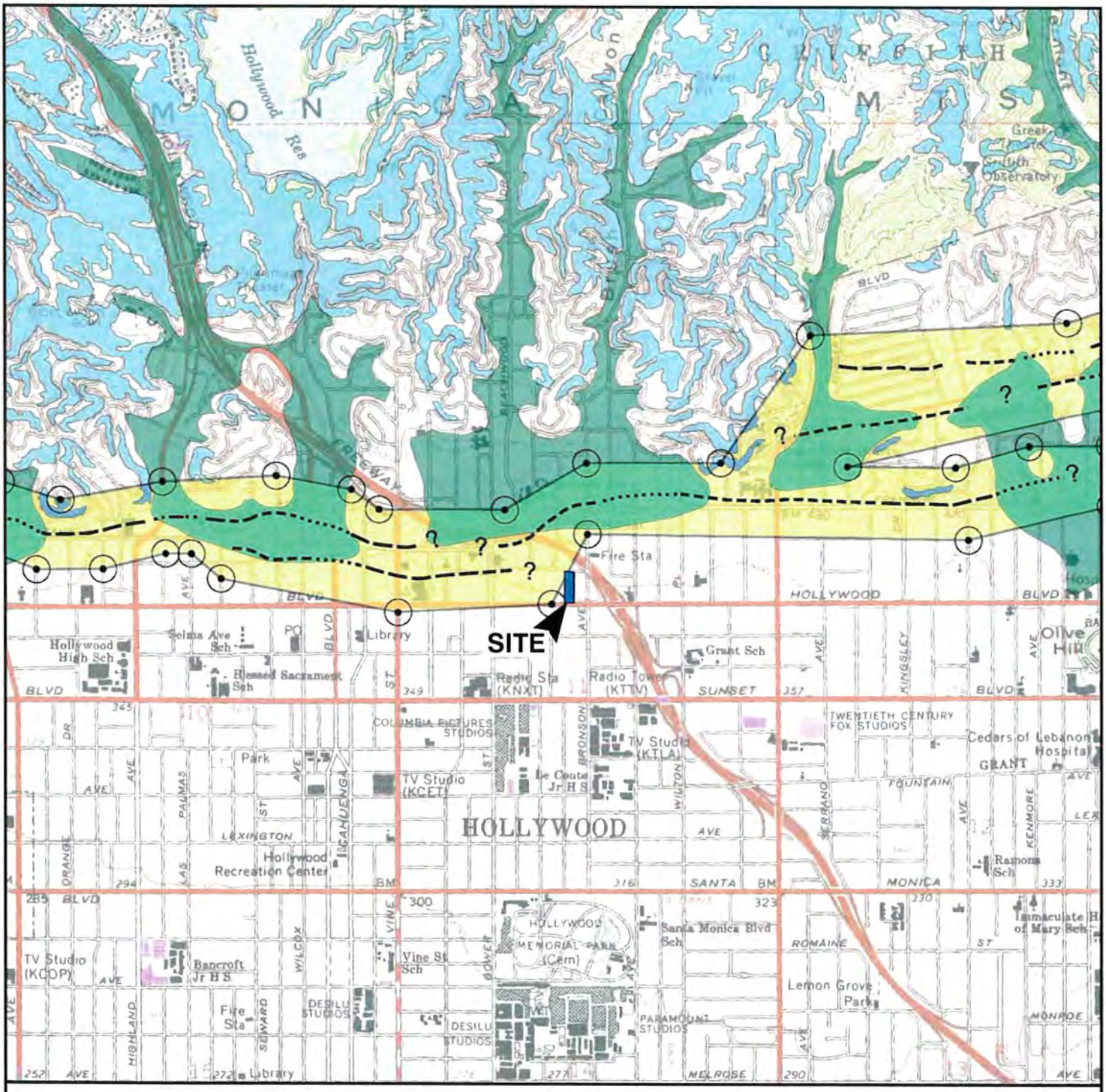

LEGEND

Potentially Active Faults

1906 C

Faults considered to have been active during Holocene time and to have a relatively high potential for surface rupture, solid line where accurately located, long dash where approximately located, short dash where inferred, dotted where concealed; query (?) indicates additional uncertainty. Evidence of historic offset indicated by year of earthquake-associated event or C for displacement caused by creep or possible creep.

Special Studies Zone Boundaries

These are delineated as straight-line segments that connect encircled turning points so as to define special studies zone segments.

Seaward projection of zone boundary.

N

SCALE IN FEET

0 2,000 4,000

NOTE: DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE.

Ninyo & Moore

PROJECT NO. 402132007

DATE 6/15

EARTHQUAKE FAULT ZONES

HOLLYWOOD COURTHOUSE
5925 HOLLYWOOD BOULEVARD
LOS ANGELES, CALIFORNIA

FIGURE 8

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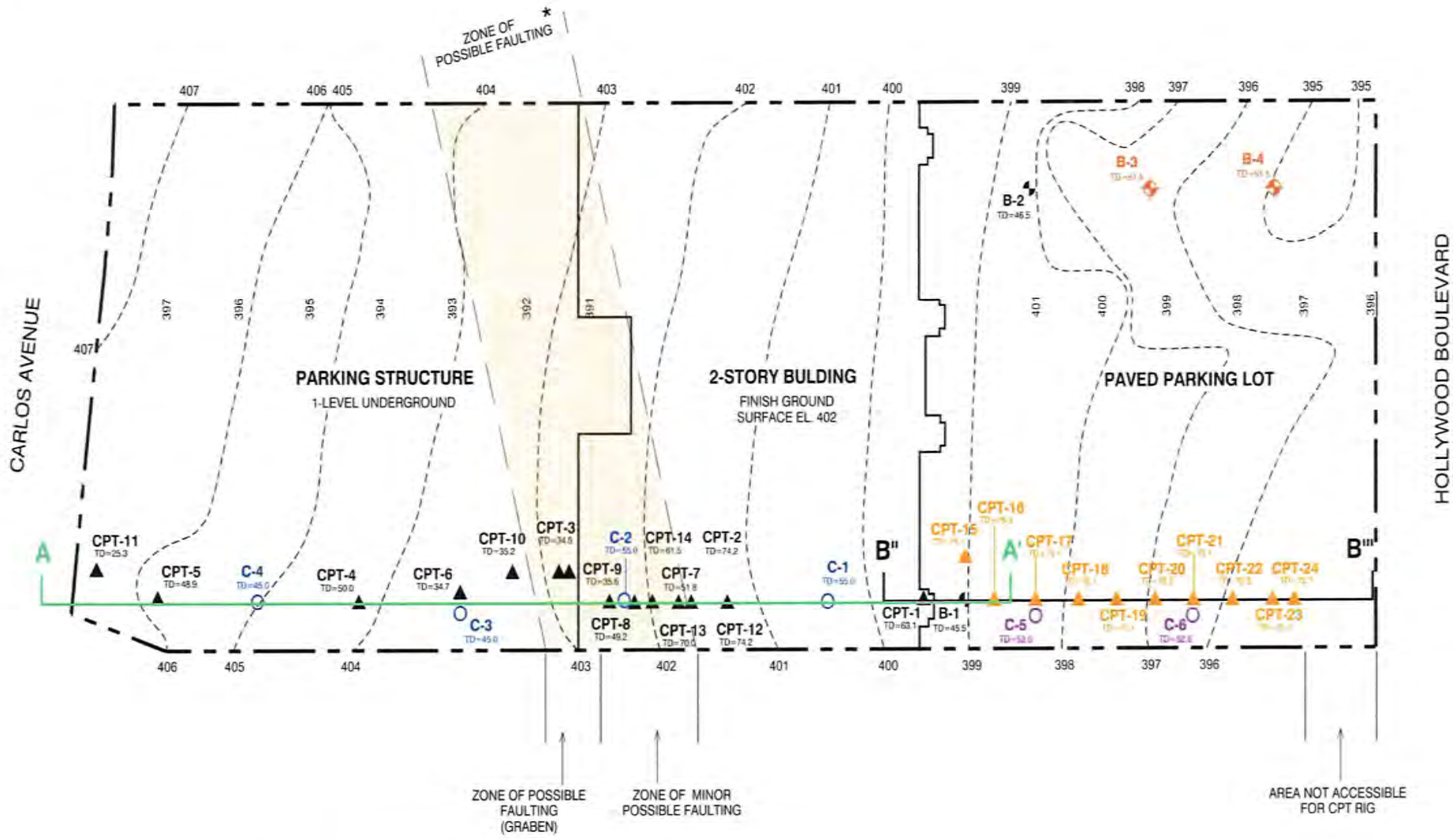

LEGEND

- 407 — PRE-EXISTING GROUND SURFACE ELEVATION (1984)
- 397 — FINISHED SURFACE ELEVATION; IN AREA OF PARKING GARAGE, ELEVATION SHOWN AS LOWER LEVEL
- C-4 TD=45.0 — CORE: TD=TOTAL DEPTH IN FEET (NINYO & MOORE, FEBRUARY 2015)
- CPT-14 TD=61.5 — CONE PENETROMETER TEST: TD=TOTAL DEPTH IN FEET (NINYO & MOORE, FEBRUARY 2015)
- B-2 TD=46.5 — BORING: TD=TOTAL DEPTH IN FEET (NINYO & MOORE, MARCH 2015)
- B-4 TD=61.5 — BORING: TD=TOTAL DEPTH IN FEET
- CPT-24 TD=75.1 — CONE PENETROMETER TEST: TD=TOTAL DEPTH IN FEET
- C-6 TD=82.6 — CORE: TD=TOTAL DEPTH IN FEET
- A — A' — CROSS SECTION: (NINYO & MOORE, 2015a)
- A" — A''' — CROSS SECTION
- * — TREND OF FAULTING BASED ON REVIEW OF GEOLOGIC LITERATURE REGARDING HOLLYWOOD FAULT

N

SCALE IN FEET
0 30 60

NOTE: DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE.

REFERENCE: K KENSHI NISHIMOTO ASSOCIATES, 1984, HOLLYWOOD MUNICIPAL COURT, ROUGH GRADING PLAN AND SECTIONS, SHEET C-2, DATED OCTOBER 9.

Ninyo & Moore

BORING AND CPT LOCATIONS

FIGURE 9

PROJECT NO. 402132007

DATE 6/15

HOLLYWOOD COURTHOUSE
5925 HOLLYWOOD BOULEVARD
LOS ANGELES, CALIFORNIA

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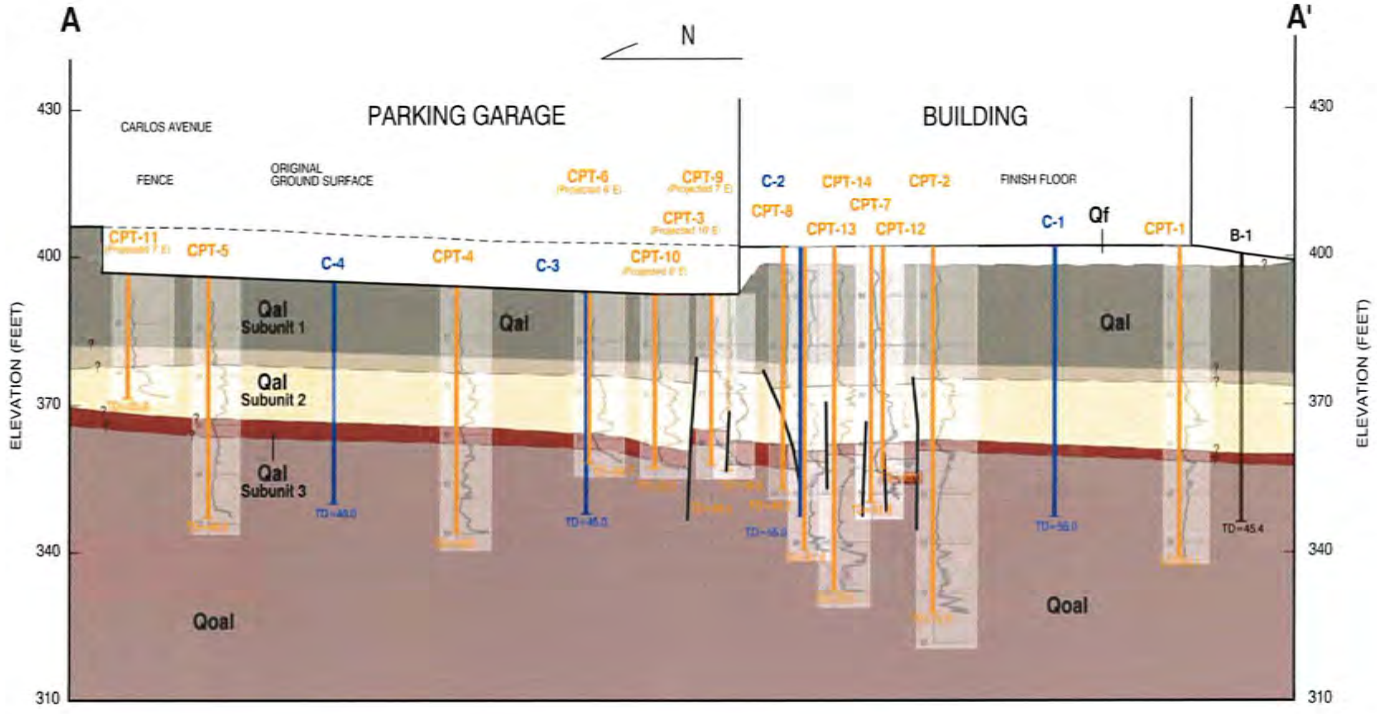

LEGEND

- GEOLOGIC CONTACT; QUERIED WHERE INFERRED
- C-4 (TD=49.0): CORE; TD=TOTAL DEPTH IN FEET
- CPT-6: CONE PENETROMETER TEST; TD=TOTAL DEPTH IN FEET
- B-2 (TD=34.7): BORING; TD=TOTAL DEPTH IN FEET
- Qf: FILL
- Qal Subunit 1 / Qal Subunit 2 / Qal Subunit 3: ALLUVIUM
- Qoal: OLDER ALLUVIUM
- POSSIBLE FAULT

SCALE IN FEET
0 30 60

NOTE: DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE

REFERENCE: NINYO & MOORE, 2015, FAULT RUPTURE HAZARD EVALUATION, DATED, FEBRUARY 24

Ninyo & Moore

PROJECT NO.	DATE
402132007	6/15

CROSS SECTION A-A'

HOLLYWOOD COURTHOUSE
5925 HOLLYWOOD BOULEVARD
LOS ANGELES, CALIFORNIA

FIGURE
10

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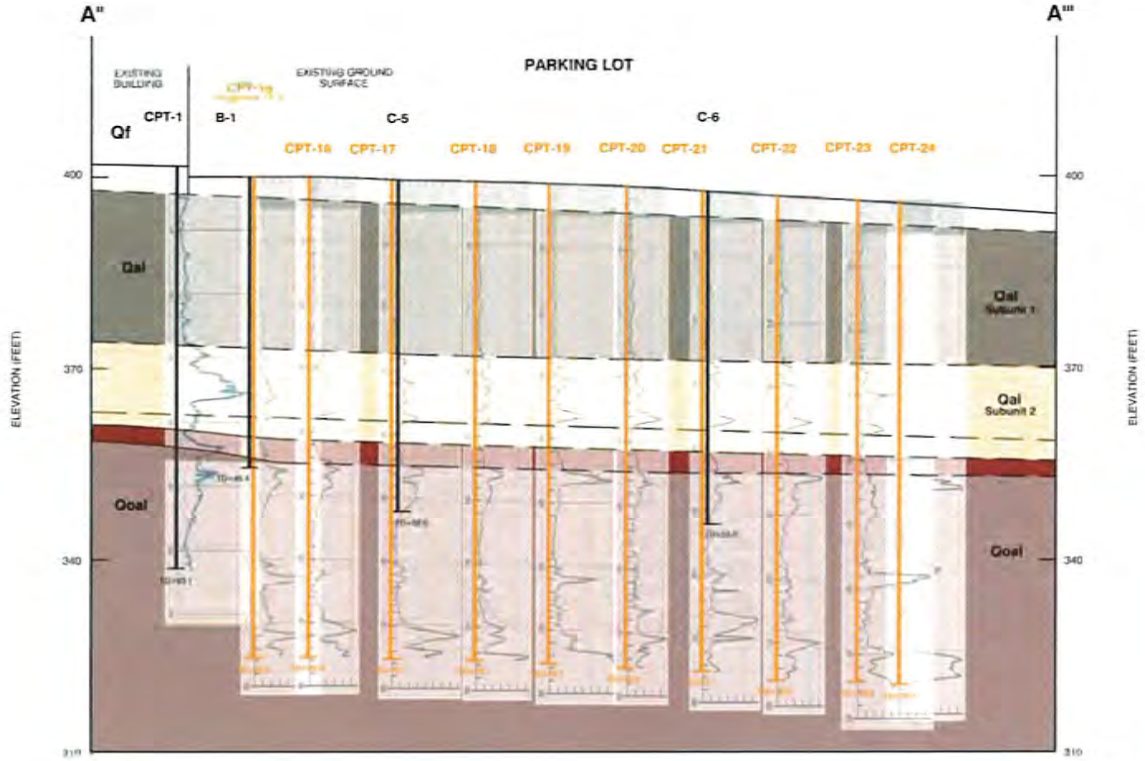

LEGEND

- GEOLOGIC CONTACT; QUERIED WHERE INFERRED
- CPT-1 (TD=63.1) — CONE PENETROMETER TEST; TD=TOTAL DEPTH IN FEET (NINYO & MOORE, 2015a)
- CPT-24 — CONE PENETROMETER TEST; TD=TOTAL DEPTH IN FEET
- B-1 (TD=45.4) — BORING; TD=TOTAL DEPTH IN FEET (NINYO & MOORE, 2015b)
- C-6 (TD=52.0) — CORE; TD=TOTAL DEPTH IN FEET
- Qf — FILL
- Qal Subunit 1 / Qal Subunit 2 — ALLUVIUM
- Qoal — OLDER ALLUVIUM

SCALE IN FEET

0 30 60

NOTE: DIMENSIONS, DIRECTIONS AND LOCATIONS ARE APPROXIMATE.

Ninyo & Moore

PROJECT NO. 402132007

DATE 6/15

CROSS SECTION A"-A'''

HOLLYWOOD COURTHOUSE
5925 HOLLYWOOD BOULEVARD
LOS ANGELES, CALIFORNIA

FIGURE 11

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APPENDIX A

BORING LOGS

Field Procedure for the Collection of Disturbed Samples

Disturbed soil samples were obtained in the field using the following methods.

Bulk Samples

Bulk samples of representative earth materials were obtained from the exploratory borings. The samples were bagged and transported to the laboratory for testing.

The Standard Penetration Test (SPT) Spoon

Disturbed drive samples of earth materials were obtained by means of a Standard Penetration Test spoon sampler. The sampler is composed of a split barrel with an external diameter of 2 inches and an unlined internal diameter of 1 3/8 inches. The spoon was driven into the ground 12 to 18 inches with a 140-pound hammer free-falling from a height of 30 inches in general accordance with ASTM D 1586-99. The blow counts were recorded for every 6 inches of penetration; the blow counts reported on the logs are those for the last 12 inches of penetration. Soil samples were observed and removed from the spoon, bagged, sealed, and transported to the laboratory for testing.

Field Procedure for the Collection of Relatively Undisturbed Samples

Relatively undisturbed soil samples were obtained in the field using the following method.

The Modified Split-Barrel Drive Sampler

The sampler, with an external diameter of 3 inches, was lined with 1-inch-long, thin brass rings with inside diameters of approximately 2.4 inches. The sample barrel was driven into the ground with the weight of a hammer or the kelly bar of the drill rig in general accordance with ASTM D 3550-01. The driving weight was permitted to fall freely. The approximate length of the fall, the weight of the hammer or bar, and the number of blows per foot of driving are presented on the boring logs as an index to the relative resistance of the materials sampled. The samples were removed from the sample barrel in the brass rings, sealed, and transported to the laboratory for testing.

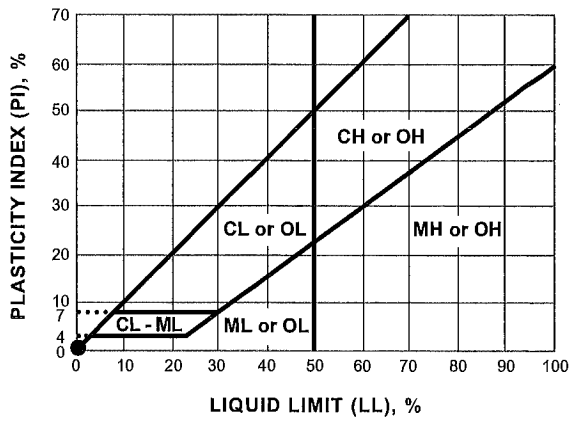
SOIL CLASSIFICATION CHART PER ASTM D 2488

PRIMARY DIVISIONS			SECONDARY DIVISIONS	
			GROUP SYMBOL	GROUP NAME
COARSE-GRAINED SOILS more than 50% retained on No. 200 sieve	**GRAVEL** more than 50% of coarse fraction retained on No. 4 sieve	CLEAN GRAVEL less than 5% fines	GW	well-graded GRAVEL
			GP	poorly graded GRAVEL
		GRAVEL with DUAL CLASSIFICATIONS 5% to 12% fines	GW-GM	well-graded GRAVEL with silt
			GP-GM	poorly graded GRAVEL with silt
			GW-GC	well-graded GRAVEL with clay
			GP-GC	poorly graded GRAVEL with clay
		GRAVEL with FINES more than 12% fines	GM	silty GRAVEL
			GC	clayey GRAVEL
			GC-GM	silty, clayey GRAVEL
	SAND 50% or more of coarse fraction passes No. 4 sieve	CLEAN SAND less than 5% fines	SW	well-graded SAND
			SP	poorly graded SAND
		SAND with DUAL CLASSIFICATIONS 5% to 12% fines	SW-SM	well-graded SAND with silt
			SP-SM	poorly graded SAND with silt
			SW-SC	well-graded SAND with clay
			SP-SC	poorly graded SAND with clay
		SAND with FINES more than 12% fines	SM	silty SAND
			SC	clayey SAND
			SC-SM	silty, clayey SAND
FINE-GRAINED SOILS 50% or more passes No. 200 sieve	**SILT and CLAY** liquid limit less than 50%	INORGANIC	CL	lean CLAY
			ML	SILT
			CL-ML	silty CLAY
		ORGANIC	OL (PI > 4)	organic CLAY
			OL (PI < 4)	organic SILT
	SILT and CLAY liquid limit 50% or more	INORGANIC	CH	fat CLAY
			MH	elastic SILT
		ORGANIC	OH (plots on or above "A"-line)	organic CLAY
			OH (plots below "A"-line)	organic SILT
	Highly Organic Soils		PT	Peat

GRAIN SIZE

DESCRIPTION		SIEVE SIZE	GRAIN SIZE	APPROXIMATE SIZE
Boulders		> 12"	> 12"	Larger than basketball-sized
Cobbles		3 - 12"	3 - 12"	Fist-sized to basketball-sized
Gravel	Coarse	3/4 - 3"	3/4 - 3"	Thumb-sized to fist-sized
	Fine	#4 - 3/4"	0.19 - 0.75"	Pea-sized to thumb-sized
Sand	Coarse	#10 - #4	0.079 - 0.19"	Rock-salt-sized to pea-sized
	Medium	#40 - #10	0.017 - 0.079"	Sugar-sized to rock-salt-sized
	Fine	#200 - #40	0.0029 - 0.017"	Flour-sized to sugar-sized
Fines		Passing #200	< 0.0029"	Flour-sized and smaller

PLASTICITY CHART



APPARENT DENSITY - COARSE-GRAINED SOIL

APPARENT DENSITY	SPOOLING CABLE OR CATHEAD		AUTOMATIC TRIP HAMMER	
	SPT (blows/foot)	MODIFIED SPLIT BARREL (blows/foot)	SPT (blows/foot)	MODIFIED SPLIT BARREL (blows/foot)
Very Loose	≤ 4	≤ 8	≤ 3	≤ 5
Loose	5 - 10	9 - 21	4 - 7	6 - 14
Medium Dense	11 - 30	22 - 63	8 - 20	15 - 42
Dense	31 - 50	64 - 105	21 - 33	43 - 70
Very Dense	> 50	> 105	> 33	> 70

CONSISTENCY - FINE-GRAINED SOIL

CONSISTENCY	SPOOLING CABLE OR CATHEAD		AUTOMATIC TRIP HAMMER	
	SPT (blows/foot)	MODIFIED SPLIT BARREL (blows/foot)	SPT (blows/foot)	MODIFIED SPLIT BARREL (blows/foot)
Very Soft	< 2	< 3	< 1	< 2
Soft	2 - 4	3 - 5	1 - 3	2 - 3
Firm	5 - 8	6 - 10	4 - 5	4 - 6
Stiff	9 - 15	11 - 20	6 - 10	7 - 13
Very Stiff	16 - 30	21 - 39	11 - 20	14 - 26
Hard	> 30	> 39	> 20	> 26

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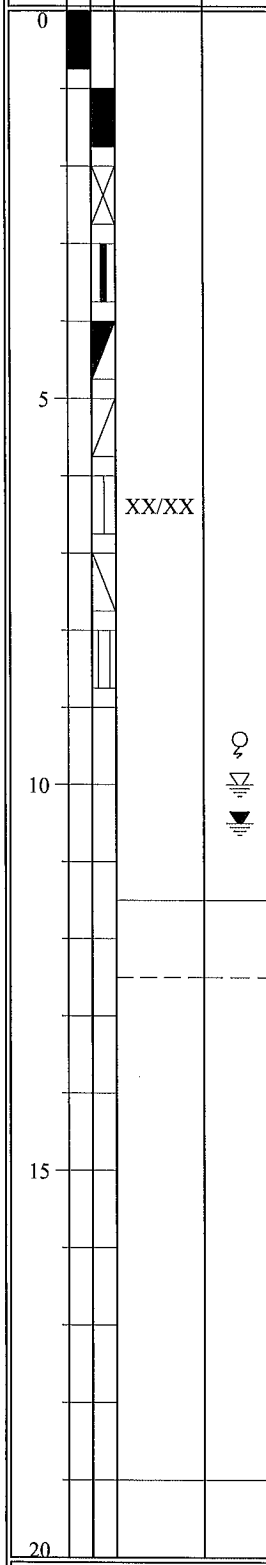
USCS METHOD OF SOIL CLASSIFICATION

Explanation of USCS Method of Soil Classification

PROJECT NO.	DATE	FIGURE

BORING LOG EXPLANATION SHEET



Bulk sample.

Modified split-barrel drive sampler.

No recovery with modified split-barrel drive sampler.

Sample retained by others.

Standard Penetration Test (SPT).

No recovery with a SPT.

Shelby tube sample. Distance pushed in inches/length of sample recovered in inches.

No recovery with Shelby tube sampler.

Continuous Push Sample.

Seepage.

Groundwater encountered during drilling.

Groundwater measured after drilling.

SM

MAJOR MATERIAL TYPE (SOIL):
Solid line denotes unit change.

CL

Dashed line denotes material change.

Attitudes: Strike/Dip
b: Bedding
c: Contact
j: Joint
f: Fracture
F: Fault
cs: Clay Seam
s: Shear
bss: Basal Slide Surface
sf: Shear Fracture
sz: Shear Zone
sbs: Shear Bedding Surface

The total depth line is a solid line that is drawn at the bottom of the boring.

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BORING LOG

Explanation of Boring Log Symbols

PROJECT NO.	DATE	FIGURE
	Rev. 11/11	

DATE DRILLED 5/11/15 BORING NO. B-1

GROUND ELEVATION 398' ± (MSL) SHEET 1 OF 2

METHOD OF DRILLING 8" Hollow-Stem Auger (Martini Drilling)

DRIVE WEIGHT 140 lbs. (Auto. Trip Hammer) DROP 30"

SAMPLED BY ZH LOGGED BY ZH REVIEWED BY JJB

DEPTH (feet)	SAMPLES (Bulk / Driven)	BLOWS/FOOT	MOISTURE (%)	DRY DENSITY (PCF)	SYMBOL	CLASSIFICATION U.S.C.S.	DESCRIPTION/INTERPRETATION
0						SM	ASPHALT CONCRETE: Approximately 3 inches thick.
						SM	AGGREGATE BASE: Olive brown, moist, medium dense, silty SAND with gravel; approximately 8 inches thick.
						SC	FILL: Brown, moist, loose, silty SAND.
		33	11.9	117.4			ALLUVIUM: Brown, moist, medium dense, clayey SAND; trace coarse sand.
10		10					
		15	7.5	105.3			
20		7	10.5				Yellowish brown; loose.
		25					Trace gravel.
30		10	14.1				Medium dense.
		34	6.6	114.0			
40							

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BORING LOG

HOLLYWOOD COURTHOUSE
5925 HOLLYWOOD BOULEVARD, LOS ANGELES, CALIFORNIA

PROJECT NO.	DATE	FIGURE
402132007	6/15	A-1

DATE DRILLED 5/11/15 BORING NO. B-1

GROUND ELEVATION 398' ± (MSL) SHEET 2 OF 2

METHOD OF DRILLING 8" Hollow-Stem Auger (Martini Drilling)

DRIVE WEIGHT 140 lbs. (Auto. Trip Hammer) DROP 30"

SAMPLED BY ZH LOGGED BY ZH REVIEWED BY JJB

DEPTH (feet)	SAMPLES (Bulk / Driven)	BLOWS/FOOT	MOISTURE (%)	DRY DENSITY (PCF)	SYMBOL	CLASSIFICATION U.S.C.S.	DESCRIPTION/INTERPRETATION
40		12	14.1			SC	ALLUVIUM: (Continued) Light yellowish brown, moist, medium dense, clayey SAND.
						CL	OLDER ALLUVIUM: Dark reddish brown, moist, very stiff to hard, sandy CLAY; trace gravel and coarse sand.
		50/6"	10.8	116.4			Reddish brown and olive brown; hard; mottled; trace caliche stringers.
50		57					
							Total Depth = 51.5 feet. Groundwater was not encountered during drilling. Backfilled with on-site soils on 5/11/15. Note: Groundwater, though not encountered at the time of drilling, may rise to a higher level due to seasonal variations in precipitation and several other factors as discussed in the report. The ground elevation shown above is an estimation only. It is based on our interpretations of published maps and other documents reviewed for the purposes of this evaluation. It is not sufficiently accurate for preparing construction bids and design documents.
60							
70							
80							

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BORING LOG

HOLLYWOOD COURTHOUSE
5925 HOLLYWOOD BOULEVARD, LOS ANGELES, CALIFORNIA

PROJECT NO.	DATE	FIGURE
402132007	6/15	A-2

DATE DRILLED 5/11/15 BORING NO. B-2

GROUND ELEVATION 396' ± (MSL) SHEET 1 OF 2

METHOD OF DRILLING 8" Hollow-Stem Auger (Martini Drilling)

DRIVE WEIGHT 140 lbs. (Auto. Trip Hammer) DROP 30"

SAMPLED BY ZH LOGGED BY ZH REVIEWED BY JJB

DEPTH (feet)	SAMPLES (Bulk / Driven)	BLOWS/FOOT	MOISTURE (%)	DRY DENSITY (PCF)	SYMBOL	CLASSIFICATION U.S.C.S.	DESCRIPTION/INTERPRETATION
0						SC	ASPHALT CONCRETE: Approximately 2½ inches thick. AGGREGATE BASE: Olive brown, moist, medium dense, silty SAND with gravel; approximately 4½ inches thick. FILL: Brown, moist, loose, clayey SAND; trace gravel.
	Driven	7				SC	ALLUVIUM: Brown, moist, loose, clayey SAND; trace gravel and coarse sand.
10	Driven	16	10.1	104.4			Medium dense.
	Driven	6					Loose.
20	Driven	13	19.9	96.0			
	Driven	6				CL	Yellowish brown, moist, stiff, sandy CLAY.
30	Driven	21	18.8	104.3			Very stiff.
						SM	Yellowish brown, moist, medium dense, silty SAND.
	Driven	12				SC	Yellowish brown, moist, medium dense, clayey SAND.
40							

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BORING LOG

HOLLYWOOD COURTHOUSE
5925 HOLLYWOOD BOULEVARD, LOS ANGELES, CALIFORNIA

PROJECT NO.	DATE	FIGURE
402132007	6/15	A-3

DATE DRILLED 5/11/15 BORING NO. B-2

GROUND ELEVATION 396' ± (MSL) SHEET 2 OF 2

METHOD OF DRILLING 8" Hollow-Stem Auger (Martini Drilling)

DRIVE WEIGHT 140 lbs. (Auto. Trip Hammer) DROP 30"

SAMPLED BY ZH LOGGED BY ZH REVIEWED BY JJB

DEPTH (feet)	SAMPLES (Bulk / Driven)	BLOWS/FOOT	MOISTURE (%)	DRY DENSITY (PCF)	SYMBOL	CLASSIFICATION U.S.C.S.	DESCRIPTION/INTERPRETATION
40		24	16.6	112.1		CL	OLDER ALLUVIUM: Dark reddish brown, moist, very stiff, sandy CLAY; trace coarse sand.
		41					Hard. Difficult drilling.
50		98/10"					Total Depth = 51 feet. Groundwater was not encountered during drilling. Backfilled with bentonite-grout on 5/11/15. Note: Groundwater, though not encountered at the time of drilling, may rise to a higher level due to seasonal variations in precipitation and several other factors as discussed in the report. The ground elevation shown above is an estimation only. It is based on our interpretations of published maps and other documents reviewed for the purposes of this evaluation. It is not sufficiently accurate for preparing construction bids and design documents.
60							
70							
80							

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BORING LOG

HOLLYWOOD COURTHOUSE
5925 HOLLYWOOD BOULEVARD, LOS ANGELES, CALIFORNIA

PROJECT NO.	DATE	FIGURE
402132007	6/15	A-4

DIRECT PUSH CORE LOGS

DATE DRILLED 5/11/15 CORE NO. C-1

GROUND ELEVATION 399.6'± (MSL) SHEET 1 OF 4

METHOD OF DRILLING TRUCK MOUNTED DIRECT PUSH DRILLER MARTINI DRILLING

LOCATION PARKING LOT - WEST SIDE

SAMPLED BY ZH LOGGED BY ZH REVIEWED BY JJB

Elevation, feet	Depth, feet	CORE Run No.	CORE Box No.	CORE Recovery, %	U.S.C.S. Classification	DESCRIPTION/INTERPRETATION	DRILL TIME	FIELD NOTES AND LAB TESTS
399.6	0					ASPHALT CONCRETE		
					SM	Approximately 4 inches thick.		Hand Auger to 5 feet
						AGGREGATE BASE		
398.6	1					Olive brown, moist, loose, silty SAND with gravel, approximately 5 inches thick		
						FILL		
397.6	2				SM	Brown, moist, loose, silty SAND; trace gravel,		
396.6	3							
395.6	4				SC	ALLUVIUM - SUBUNIT 1		
						Dark yellowish brown, (10YR 3/4), moist, loose, clayey SAND; trace coarse sand.		
394.6	5							
393.6	6	1	1	36				
392.6	7							
391.6	8							
390.6	9							
389.6	10	2		35				
388.6	11							
387.6	12					@ 11.9' Light gray, subrounded to subangular gravel up to 3/4 inch.		
386.6	13							
		3		42				
385.6	14				CL	Dark brown, (10YR 3/3), moist, firm, sandy CLAY; trace coarse sand.		
384.6	15				SC-SM	Dark yellowish brown, (10YR 3/4), moist, loose, clayey to silty SAND; trace coarse sand and fine, subangular gravel.		
383.6	16							

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CORE LOG

HOLLYWOOD COURTHOUSE
5925 HOLLYWOOD BOULEVARD
LOS ANGELES, CALIFORNIA

PROJECT NO.	DATE	FIGURE
402132007	6/15	A-5

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DATE DRILLED 5/11/15 CORE NO. C-1

GROUND ELEVATION 399.6'± (MSL) SHEET 2 OF 4

METHOD OF DRILLING TRUCK MOUNTED DIRECT PUSH DRILLER MARTINI DRILLING

LOCATION PARKING LOT - WEST SIDE

SAMPLED BY ZH LOGGED BY ZH REVIEWED BY JJB

Elevation, feet	Depth, feet	CORE Run No.	CORE Box No.	CORE Recovery, %	U.S.C.S. Classification	DESCRIPTION/INTERPRETATION	DRILL TIME	FIELD NOTES AND LAB TESTS
384.6	16	4	1	50	SC-SM	ALLUVIUM - SUBUNIT 1 CONT. Dark yellowish brown (10YR 3/4), moist, loose, clayey to silty SAND; trace coarse sand and fine, subangular gravel.		
383.6	17							
382.6	18							
381.6	19							
380.6	20	5		42		Dark yellowish brown, (10YR 4/4), trace subrounded gravel.		
379.6	21							
						Graditional Contact		
378.6	22				CL	Yellowish brown, (10YR 5/6), moist, firm to stiff, sandy CLAY; trace fine to coarse sand.		
377.6	23					@ 23'6" 2 inch clayey sand lens.		
376.6	24	6		69				
375.6	25							
374.6	26					Thin interbeds of clayey SAND.		
373.6	27					@ 27'6" 2-inch interbed of dark yellowish brown (10YR 6/4), moist, medium dense, poorly graded SAND.		
372.6	28	7	2	85	SP	ALLUVIUM - SUBUNIT 2 Dark yellowish brown (10YR 6/4), moist, medium dense, poorly graded SAND; fine to medium grained; scattered lenses with trace clay.		
371.6	29					@ 29'9" 3-inch interbed of dark yellowish brown (10YR 4/4), moist, stiff sandy CLAY; shallow angular contact.		
370.6	30					@ 30' 1-inch thick lens of poorly graded SAND. @ 30'1" 5-inch thick interbed of dark yellowish brown (10YR 4/4), moist, medium dense, clayey SAND.		
369.6	31					@ 30'6": Dark yellowish brown (10YR 6/4), moist, stiff, sandy CLAY; gradational to clayey SAND.		
368.6	32					@ 31' Yellowish brown (10YR 5/6), moist, medium dense, poorly graded SAND; trace gravel.		

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CORE LOG

HOLLYWOOD COURTHOUSE
5925 HOLLYWOOD BOULEVARD
LOS ANGELES, CALIFORNIA

PROJECT NO.	DATE	FIGURE
402132007	6/15	A-6

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DATE DRILLED 5/11/15 CORE NO. C-1

GROUND ELEVATION 399.6'± (MSL) SHEET 3 OF 4

METHOD OF DRILLING TRUCK MOUNTED DIRECT PUSH DRILLER MARTINI DRILLING

LOCATION PARKING LOT - WEST SIDE

SAMPLED BY ZH LOGGED BY ZH REVIEWED BY JJB

Elevation, feet	Depth, feet	CORE: Run No.	CORE: Box No.	CORE: Recovery, %	U.S.C.S. Classification	DESCRIPTION/INTERPRETATION	DRILL TIME	FIELD NOTES AND LAB TESTS
367.6	32	8	2	83	SP	ALLUVIUM - SUBUNIT 2 CONT. Yellowish brown (10YR 5/6), moist, medium dense, poorly graded SAND; trace gravel.		
366.6	33					@ 33' to 34' Gradational interbeds of sandy CLAY; and clayey SAND.		
365.6	34				SC	Yellowish brown (10YR 5/6), moist, medium dense, clayey SAND.		
364.6	35							
363.6	36	9		81				
362.6	37					@ 37'10" Groundwater carbonation on gravel.		
361.6	38				SP	Very pale brown (10YR 7/4), moist, medium dense, poorly graded SAND.		
360.6	39				SC	ALLUVIUM - SUBUNIT 3 Dark yellowish brown (10YR 7/4), moist, medium dense, clayey SAND; trace, coarse sand and fine gravel. @ 39'8" stringers of dark brown (10YR 3/3), moist, stiff, sandy CLAY.		
359.6	40	10		73		OLDER ALLUVIUM Very dark brown (7.5YR 3/4), moist, very stiff, sandy CLAY. Paleosol 1; A horizon (approximately 17 1/2 inches in thickness).		
358.6	41				CL	Strong brown (7.5YR 4/6), trace coarse sand.		
357.6	42							
356.6	43							
355.6	44	11		100				
354.6	45					Scattered carbonated gravel.		
353.6	46				SC	Very pale brown (10YR 7/4), moist, dense, clayey SAND; low angular contact; Paleosol 2; A horizon (approximately 5 inches in thickness). Graditional to dark yellowish brown (10YR 3/4), clayey SAND to sandy CLAY.		
352.6	47							
351.6	48							

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CORE LOG

HOLLYWOOD COURTHOUSE
5925 HOLLYWOOD BOULEVARD
LOS ANGELES, CALIFORNIA

PROJECT NO.	DATE	FIGURE
402132007	6/15	A-7

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DATE DRILLED 5/11/15 CORE NO. C-1

GROUND ELEVATION 399.6'± (MSL) SHEET 4 OF 4

METHOD OF DRILLING TRUCK MOUNTED DIRECT PUSH DRILLER MARTINI DRILLING

LOCATION PARKING LOT - WEST SIDE

SAMPLED BY ZH LOGGED BY ZH REVIEWED BY JJB

Elevation, feet	Depth, feet	CORE: Run No.	CORE: Box No.	CORE: Recovery, %	U.S.C.S. Classification	DESCRIPTION/INTERPRETATION	DRILL TIME	FIELD NOTES AND LAB TESTS
367.6	48	12	2	100	SC	OLDER ALLUVIUM CONT. Yellowish brown (10YR 3/4), moist, dense, clayey SAND.		
					CL	Brown (7.5YR 4/4), moist, hard, sandy CLAY; trace coarse sand, trace subangular gravel.		
366.6	49							
349.6	50					Yellowish brown (10YR 5/6), moist, medium dense, clayey SAND.		
348.6	51							
347.6	52					Total Depth = 52.0 feet Groundwater not encountered during drilling Backfilled with bentonite grout on 5/11/15 Groundwater though not encountered at the time of drilling, may rise to a higher level due to seasonal variations in precipitation and several other factors as discussed in the report.		

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CORE LOG

HOLLYWOOD COURTHOUSE
5925 HOLLYWOOD BOULEVARD
LOS ANGELES, CALIFORNIA

PROJECT NO.	DATE	FIGURE
402132007	6/15	A-8

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DATE DRILLED 5/11/15 CORE NO. C-2

GROUND ELEVATION 397.7'± (MSL) SHEET 1 OF 4

METHOD OF DRILLING TRUCK MOUNTED DIRECT PUSH DRILLER MARTINI DRILLING

LOCATION PARKING LOT - WEST SIDE

SAMPLED BY ZH LOGGED BY ZH REVIEWED BY JJB

Elevation, feet	Depth, feet	CORE Run No.	CORE Box No.	CORE Recovery, %	U.S.C.S. Classification	DESCRIPTION/INTERPRETATION	DRILL TIME	FIELD NOTES AND LAB TESTS
397.7	0					ASPHALT CONCRETE		
					SM	Approximately 3 inches thick.		Hand Auger to 5 feet
						AGGREGATE BASE		
396.7	1					Olive brown, moist, medium dense, silty SAND with gravel, approximately 4 inches thick		
						FILL		
395.7	2				SM	Brown, moist, loose, silty SAND; trace gravel,		
394.7	3							
393.7	4							
					SC	ALLUVIUM - SUBUNIT 1		
392.7	5					Dark yellowish brown, (10YR 3/4), moist, loose, clayey SAND; trace coarse sand.		
		1	1	33				
391.7	6							
390.7	7							
389.7	8							
		2		48				
388.7	9							
387.7	10							
386.7	11							
385.7	12							
		3		50				
384.7	13							
383.7	14							
382.7	15				SM	Light yellowish brown (10YR 6/4), moist, loose, silty SAND; trace gravel.		
381.7	16				SC-SM	Dark yellowish brown (10YR 3/4), moist, loose, clayey to silty SAND; trace coarse sand.		

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CORE LOG

HOLLYWOOD COURTHOUSE
5925 HOLLYWOOD BOULEVARD
LOS ANGELES, CALIFORNIA

PROJECT NO.	DATE	FIGURE
402132007	6/15	A-9

402132007_C2-1.dwg 10:09:18 06/04/2015 GK

DATE DRILLED 5/11/15 CORE NO. C-2

GROUND ELEVATION 397.7'± (MSL) SHEET 2 OF 4

METHOD OF DRILLING TRUCK MOUNTED DIRECT PUSH DRILLER MARTINI DRILLING

LOCATION PARKING LOT - WEST SIDE

SAMPLED BY ZH LOGGED BY ZH REVIEWED BY JJB

Elevation, feet	Depth, feet	CORE: Run No.	CORE: Box No.	CORE: Recovery, %	U.S.C.S. Classification	DESCRIPTION/INTERPRETATION	DRILL TIME	FIELD NOTES AND LAB TESTS
381.7	16	4	1	48	SC-SM	ALLUVIUM - SUBUNIT 1 CONT. Dark, yellowish brown (10YR 3/4), moist, loose, clayey to silty SAND; trace coarse sand.		
380.7	17							
379.7	18							
378.7	19							
377.7	20	5		75	CL	Dark yellowish brown, (10YR 3/4), moist, very stiff, sandy CLAY; trace coarse sand.		
376.7	21							
375.7	22							
374.7	23							
373.7	24	6		85	SC	Yellowish brown, (10YR 5/6), moist, medium dense, clayey SAND.		
372.7	25							
371.7	26					Gradational contact		
					SP	ALLUVIUM - SUBUNIT 2 Yellowish brown, (10YR 5/6), moist, medium dense, poorly graded SAND.		
370.7	27				SC	Yellowish brown, (10YR 5/6), moist, medium dense, clayey SAND.		
369.7	28	7	2	83	SP	Very pale brown, (10YR 7/4), moist, medium dense, poorly graded SAND.		
368.7	29				CL	Dark yellowish brown, (10YR 4/4), moist, stiff, sandy CLAY.		
367.7	30					@ 30'4" gravel.		
366.7	31				SP	Yellowish brown (10YR 5/6), moist, medium dense, poorly graded SAND.		
365.7	32							

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CORE LOG

HOLLYWOOD COURTHOUSE
5925 HOLLYWOOD BOULEVARD
LOS ANGELES, CALIFORNIA

PROJECT NO.	DATE	FIGURE
402132007	6/15	A-10

402132007_C2-2.dwg 10:09:18 05/04/2015 GK

DATE DRILLED 5/11/15 CORE NO. C-2

GROUND ELEVATION 397.7'± (MSL) SHEET 3 OF 4

METHOD OF DRILLING TRUCK MOUNTED DIRECT PUSH DRILLER MARTINI DRILLING

LOCATION PARKING LOT - WEST SIDE

SAMPLED BY ZH LOGGED BY ZH REVIEWED BY JJB

Elevation, feet	Depth, feet	CORE: Run No.	CORE: Box No.	CORE: Recovery, %	U.S.C.S. Classification	DESCRIPTION/INTERPRETATION	DRILL TIME	FIELD NOTES AND LAB TESTS
365.7	32	8	2	79	SP	ALLUVIUM - SUBUNIT 2 CONT. Yellowish brown (10YR 5/6), moist, medium dense, poorly graded SAND.		
364.7	33					@33'6" gravel.		
					SC	Yellowish brown, (10YR 5/6), moist, medium dense, clayey SAND and sandy CLAY; interbedded; trace gravel.		
362.7	35							
361.7	36	9		79	SP	Very pale brown, (10YR 7/4), moist, medium dense, poorly graded SAND.		
360.7	37					Horizontal contact		
					SC	ALLUVIUM - SUBUNIT 3 Dark yellowish brown, (10YR 3/4), moist, dense, clayey SAND; trace coarse sand and fine gravel.		
358.7	39							
					CL	OLDER ALLUVIUM Very dark brown, (7.5YR 3/4), moist, very stiff, sandy CLAY. Paleosol 1; A horizon (approximately 14 inches in thickness).		
357.7	40	10		100				
356.7	41					Strong brown, (7.5YR 4/6), trace, coarse sand and fine gravel.		
355.7	42							
354.7	43							
353.7	44	11		100				
352.7	45					@44'9" Groundwater carbonation on coarse, subangular gravel.		
351.7	46					@45'8" carbonated gravel Brown, (7.5YR 4/4), hard. Paleosol 2; A horizon (approximately 5 inches in thickness).		
350.7	47							
349.7	48							

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CORE LOG

HOLLYWOOD COURTHOUSE
5925 HOLLYWOOD BOULEVARD
LOS ANGELES, CALIFORNIA

PROJECT NO.	DATE	FIGURE
402132007	6/15	A-11

402132007_C2-3.dwg 10:09:18 06/04/2015 GK

DATE DRILLED 5/11/15 CORE NO. C-2

GROUND ELEVATION 397.7'± (MSL) SHEET 4 OF 4

METHOD OF DRILLING TRUCK MOUNTED DIRECT PUSH DRILLER MARTINI DRILLING

LOCATION PARKING LOT - WEST SIDE

SAMPLED BY ZH LOGGED BY ZH REVIEWED BY JJB

Elevation, feet	Depth, feet	CORE: Run No.	CORE: Box No.	CORE: Recovery, %	U.S.C.S. Classification	DESCRIPTION/INTERPRETATION	DRILL TIME	FIELD NOTES AND LAB TESTS
349.7	48	12	2	100	CL	OLDER ALLUVIUM CONT. Brown (10YR 4/4), moist, hard, sandy CLAY; trace coarse sand and subangular gravel.		
348.7	49							
347.7	50							
346.7	51							
345.7	52					Total Depth = 52.0 feet Groundwater not encountered during drilling Backfilled with bentonite grout on 5/11/15 Note 3 Groundwater though not encountered at the time of drilling, may rise to a higher level due to seasonal variations in precipitation and several other factors as discussed in the report.		

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CORE LOG

HOLLYWOOD COURTHOUSE
5925 HOLLYWOOD BOULEVARD
LOS ANGELES, CALIFORNIA

PROJECT NO.	DATE	FIGURE
402132007	6/15	A-12

402132007_C2-4.dwg 10:09:18 06/04/2015 GK

APPENDIX B
CONE PENETROMETER TESTING
(GREGG DRILLING)

GREGG DRILLING & TESTING, INC.
GEOTECHNICAL AND ENVIRONMENTAL INVESTIGATION SERVICES

May 13, 2015

Ninyo & Moore
Attn: Jim Barton

Subject: CPT Site Investigation
Hollywood Courthouse
Los Angeles, California
GREGG Project Number: 14-812SH – part 3

Dear Mr. Barton:

The following report presents the results of GREGG Drilling & Testing's Cone Penetration Test investigation for the above referenced site. The following testing services were performed:

1	Cone Penetration Tests	(CPTU)	☒
2	Pore Pressure Dissipation Tests	(PPD)	☒
3	Seismic Cone Penetration Tests	(SCPTU)	☐
4	UVOST Laser Induced Fluorescence	(UVOST)	☐
5	Groundwater Sampling	(GWS)	☐
6	Soil Sampling	(SS)	☐
7	Vapor Sampling	(VS)	☐
8	Pressuremeter Testing	(PMT)	☐
9	Vane Shear Testing	(VST)	☐
10	Dilatometer Testing	(DMT)	☐

A list of reference papers providing additional background on the specific tests conducted is provided in the bibliography following the text of the report. If you would like a copy of any of these publications or should you have any questions or comments regarding the contents of this report, please do not hesitate to contact our office at (925) 313-5800.

Sincerely,
GREGG Drilling & Testing, Inc.

Peter Robertson
Technical Director, Gregg Drilling & Testing, Inc.

Cone Penetration Test Sounding Summary

-Table 1-

CPT Sounding Identification	Date	Termination Depth (feet)	Depth of Groundwater Samples (feet)	Depth of Soil Samples (feet)	Depth of Pore Pressure Dissipation Tests (feet)
CPT-01	5/12/15	75	-	-	75.1
CPT-02	5/11/15	75	-	-	75.3
CPT-03	5/11/15	75	-	-	75.1
CPT-04	5/11/15	75	-	-	75.1
CPT-05	5/11/15	75	-	-	75.1
CPT-06	5/11/15	75	-	-	75.5
CPT-07	5/11/15	75	-	-	75.1
CPT-08	5/12/15	75	-	-	75.8
CPT-09	5/12/15	75	-	-	75.3
CPT-10	5/12/15	75	-	-	75.1

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Campanella, R.G. and I. Weemees, "Development and Use of An Electrical Resistivity Cone for Groundwater Contamination Studies", Canadian Geotechnical Journal, Vol. 27 No. 5, 1990 pp. 557-567.

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Zemo, D.A., T.A. Delfino, J.D. Gallinatti, V.A. Baker and L.R. Hilpert, "Field Comparison of Analytical Results from Discrete-Depth Groundwater Samplers" BAT EnviroProbe and QED HydroPunch, Sixth national Outdoor Action Conference, Las Vegas, Nevada Proceedings, 1992, pp 299-312.

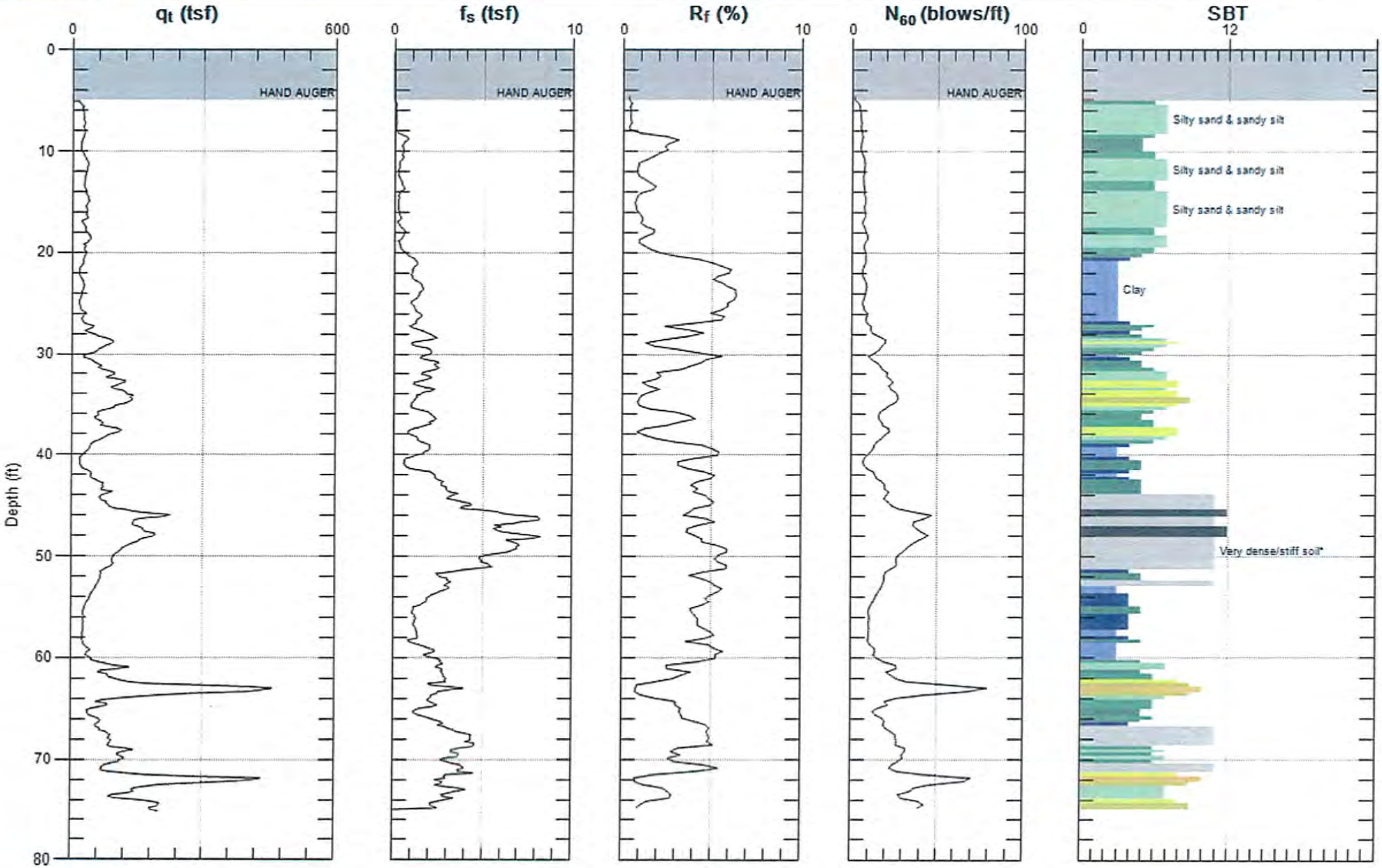
Copies of ASTM Standards are available through www.astm.org

GREGG

NINYO & MOORE

Site: HOLLYWOOD COURT
Sounding: CPT-15

Engineer: J.BARTON
Date: 5/12/2015 07:46



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Avg. Interval: 0.328 (ft)

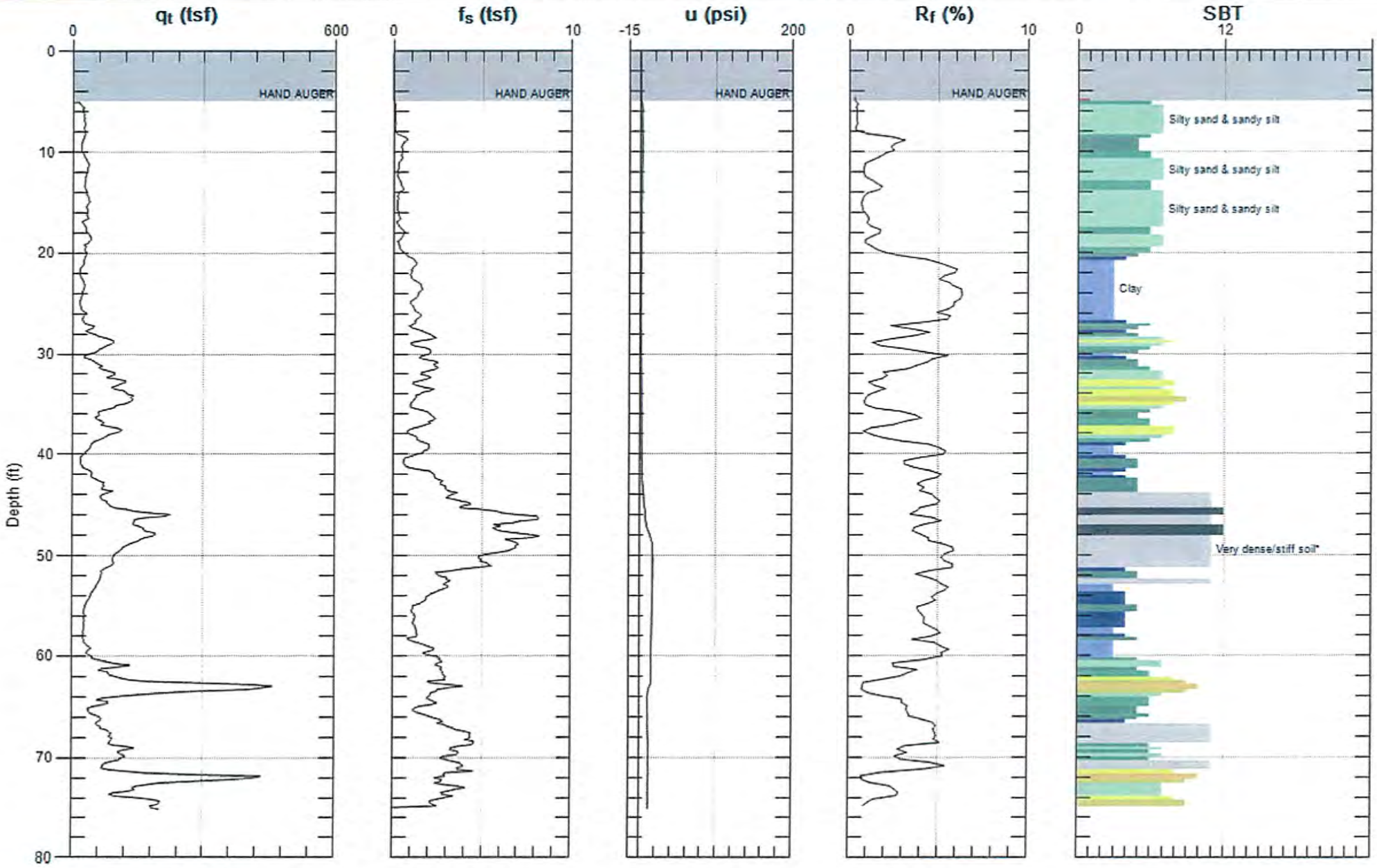
SBT: Soil Behavior Type (Robertson 1990)

GREGG

NINYO & MOORE

Site: HOLLYWOOD COURT
Sounding: CPT-15

Engineer: J.BARTON
Date: 5/12/2015 07:46



Max. Depth: 75.131 (ft)
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SBT: Soil Behavior Type (Robertson 1990)

GREGG

NINYO & MOORE

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Sounding: CPT-16

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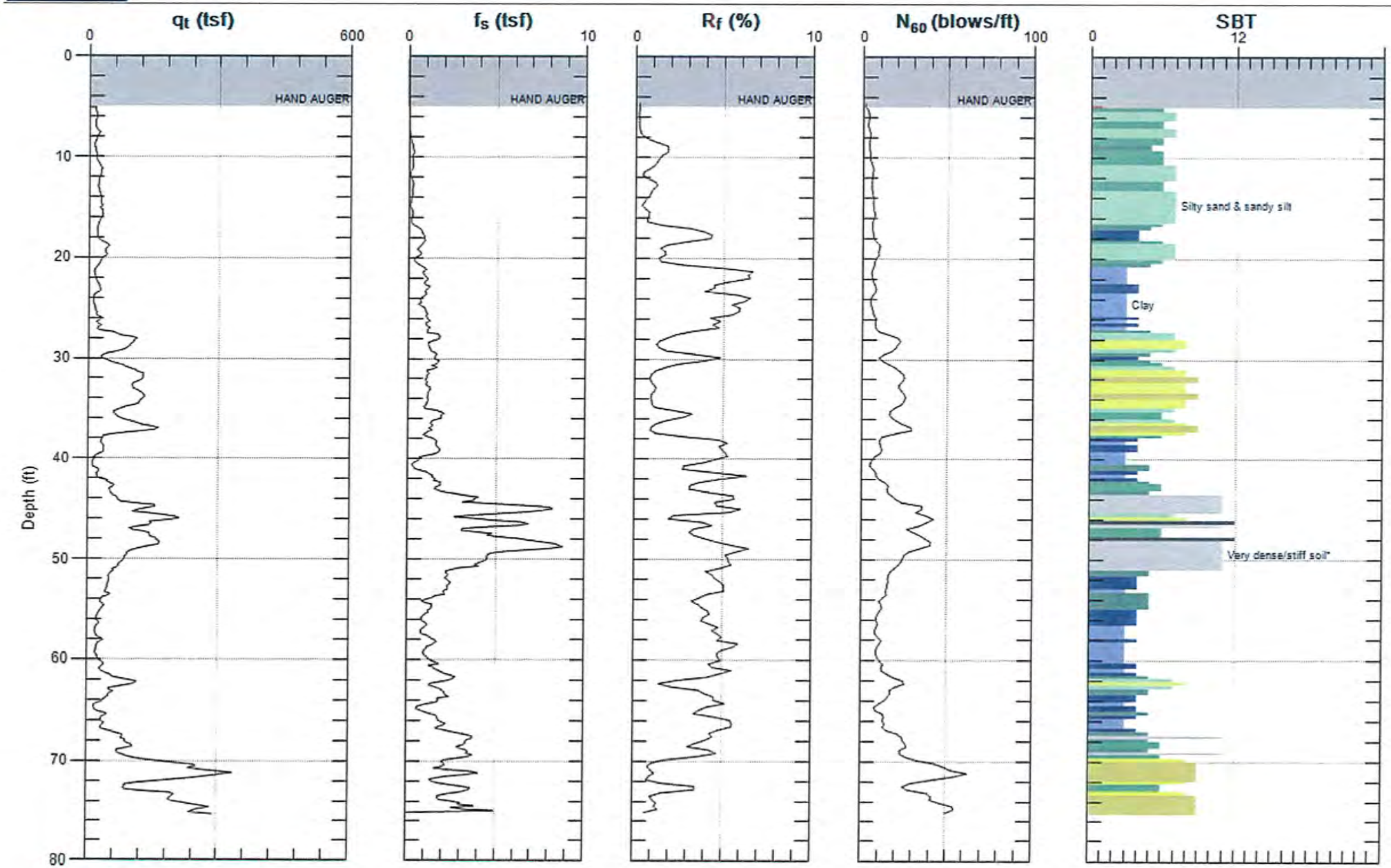
Date: 5/11/2015 01:54



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Avg. Interval: 0.328 (ft)

SBT: Soil Behavior Type (Robertson 1990)

GREGG

NINYO & MOORE

Site: HOLLYWOOD COURT
Sounding: CPT-16

Engineer: J.BARTON
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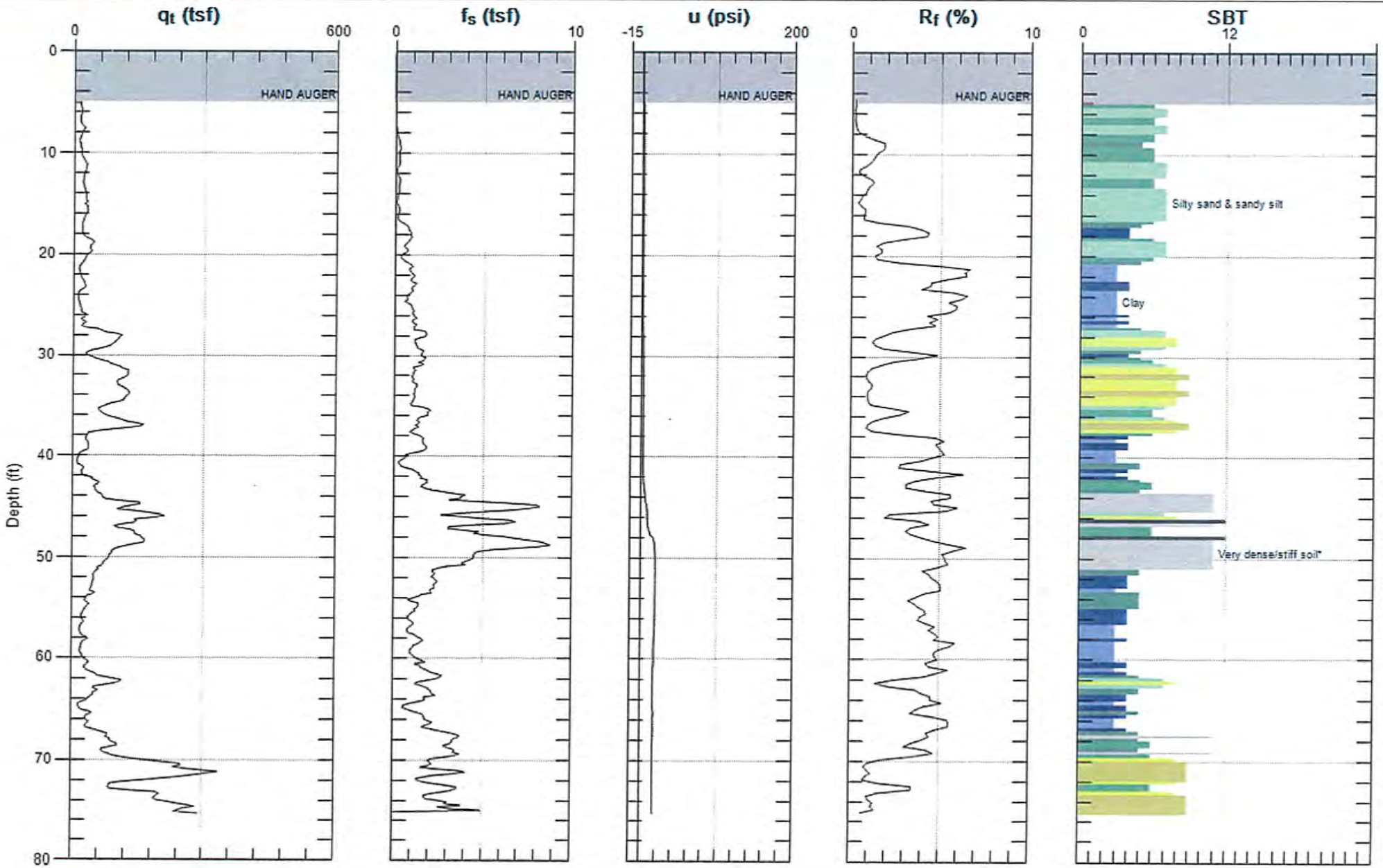

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SBT: Soil Behavior Type (Robertson 1990)

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NINYO & MOORE

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Sounding: CPT-17

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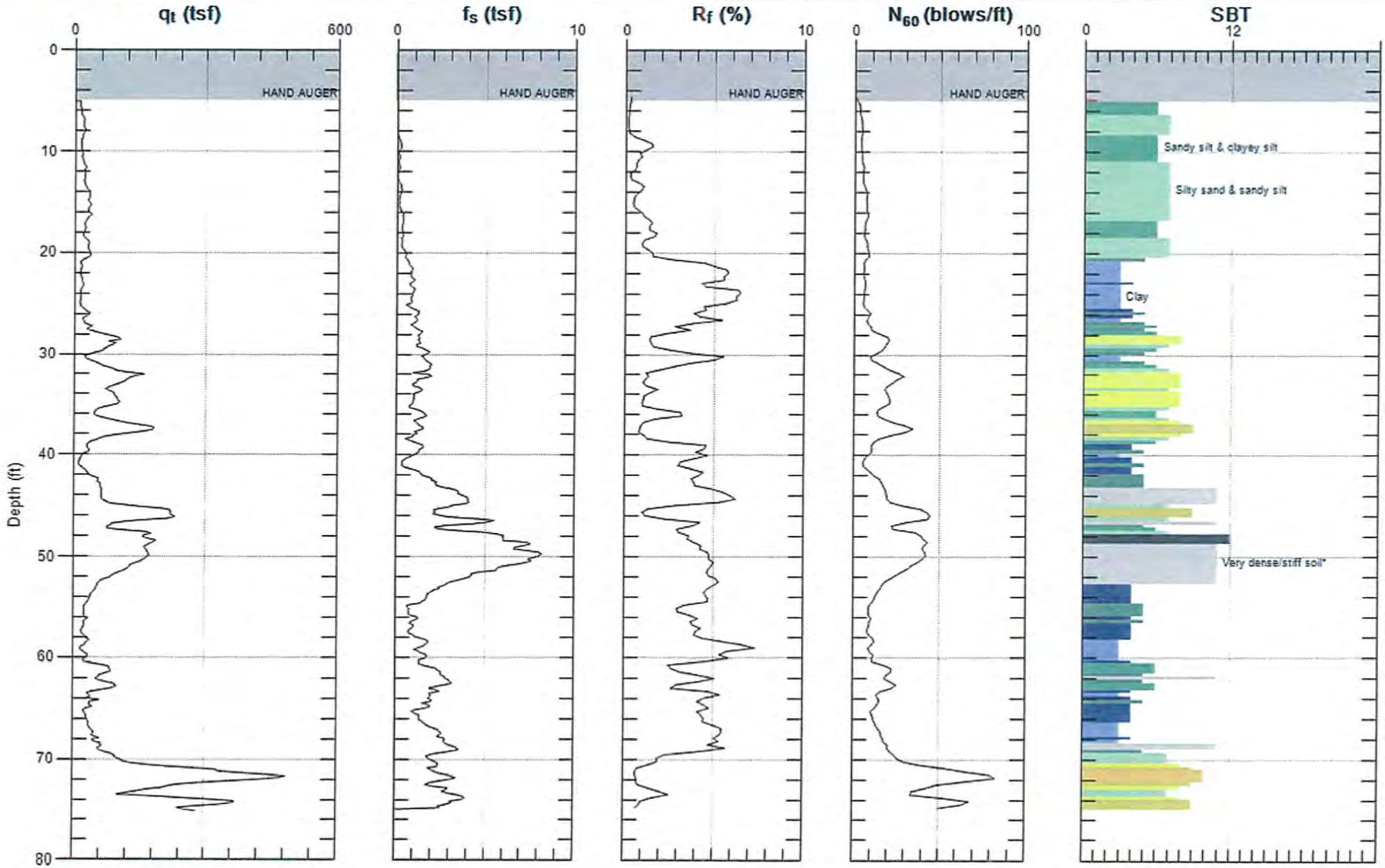

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Avg. Interval: 0.328 (ft)

SBT: Soil Behavior Type (Robertson 1990)

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NINYO & MOORE

Site: HOLLYWOOD COURT
Sounding: CPT-17

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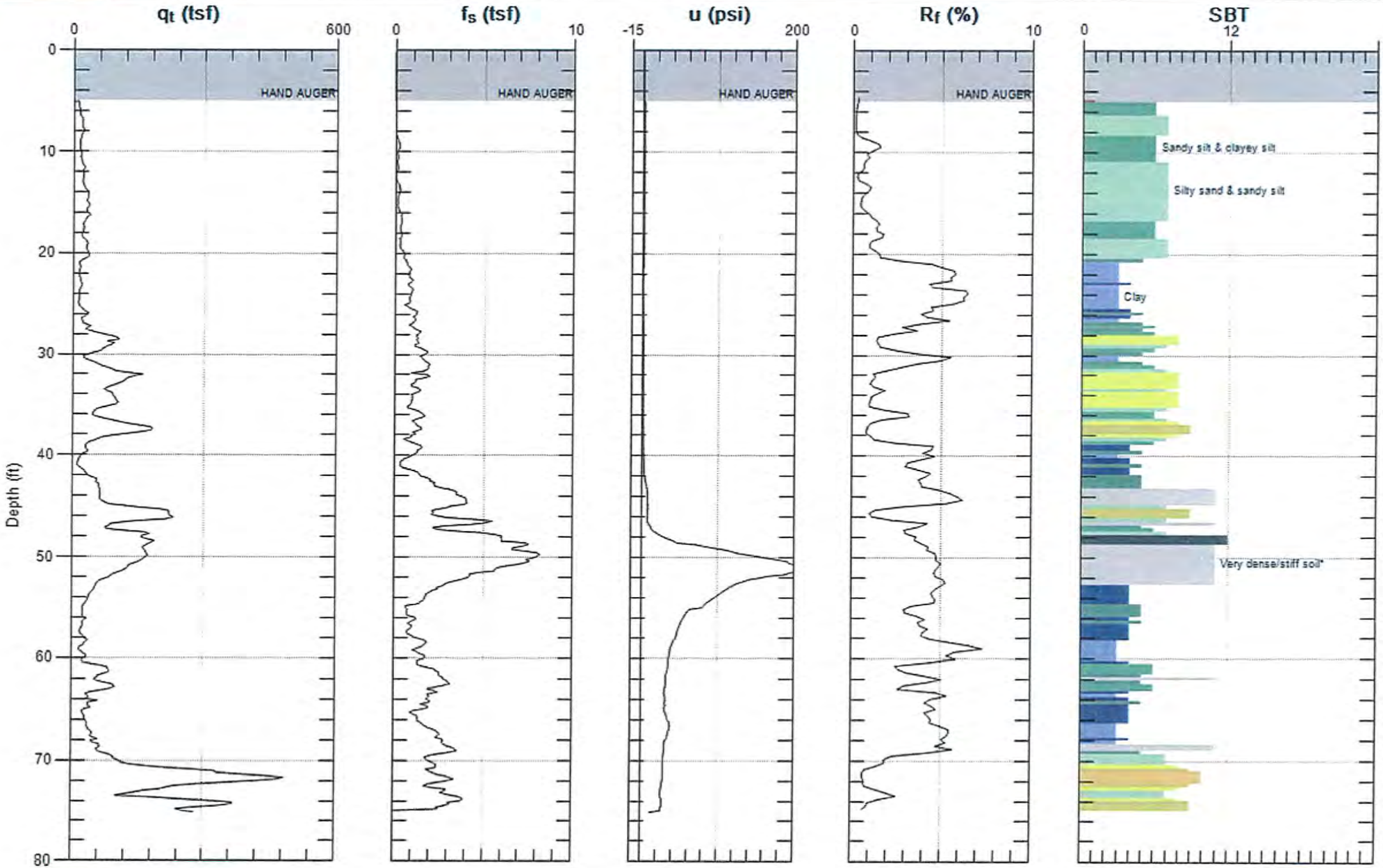

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SBT: Soil Behavior Type (Robertson 1990)

GREGG

NINYO & MOORE

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Sounding: CPT-18

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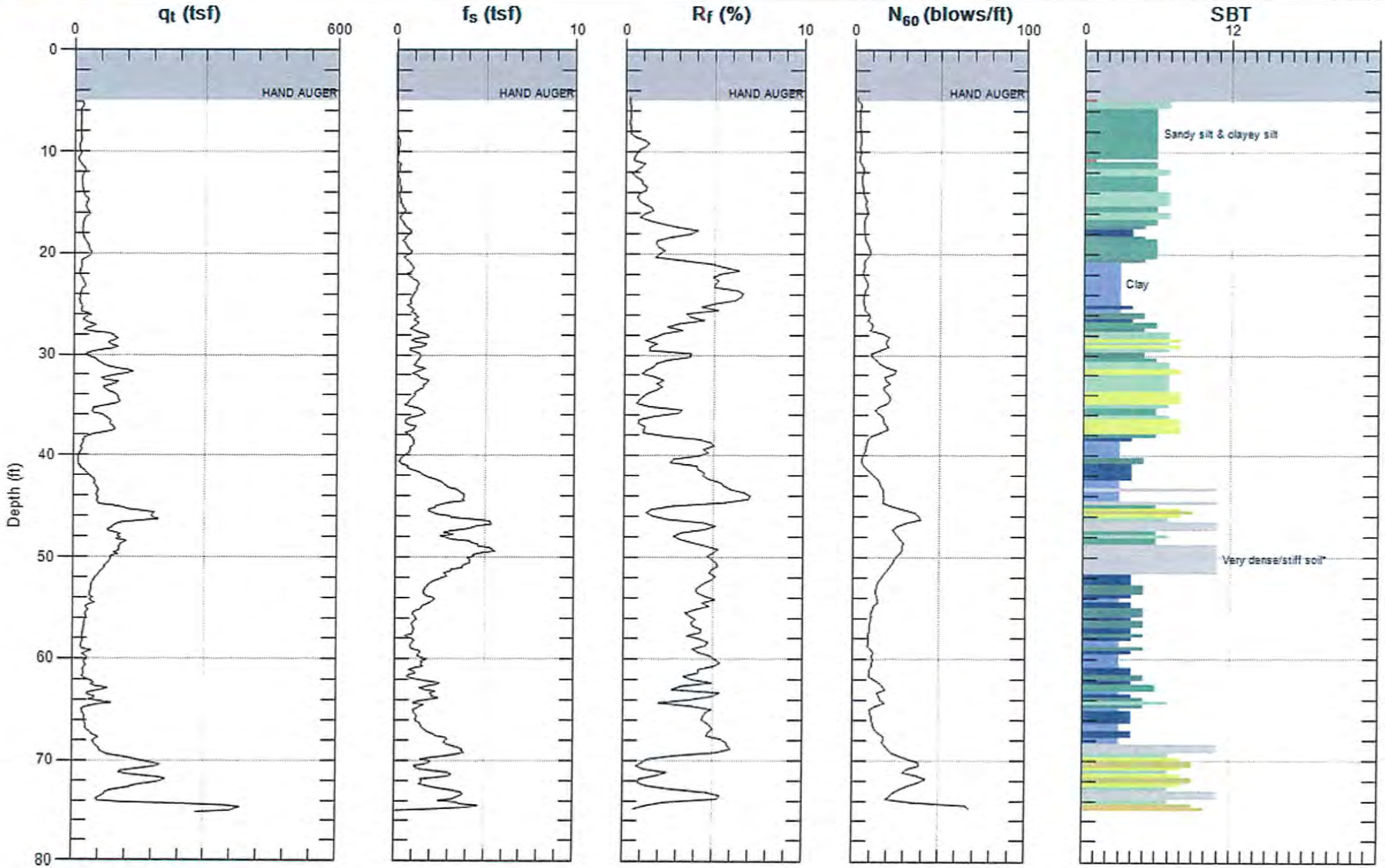

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SBT: Soil Behavior Type (Robertson 1990)

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NINYO & MOORE

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Sounding: CPT-18

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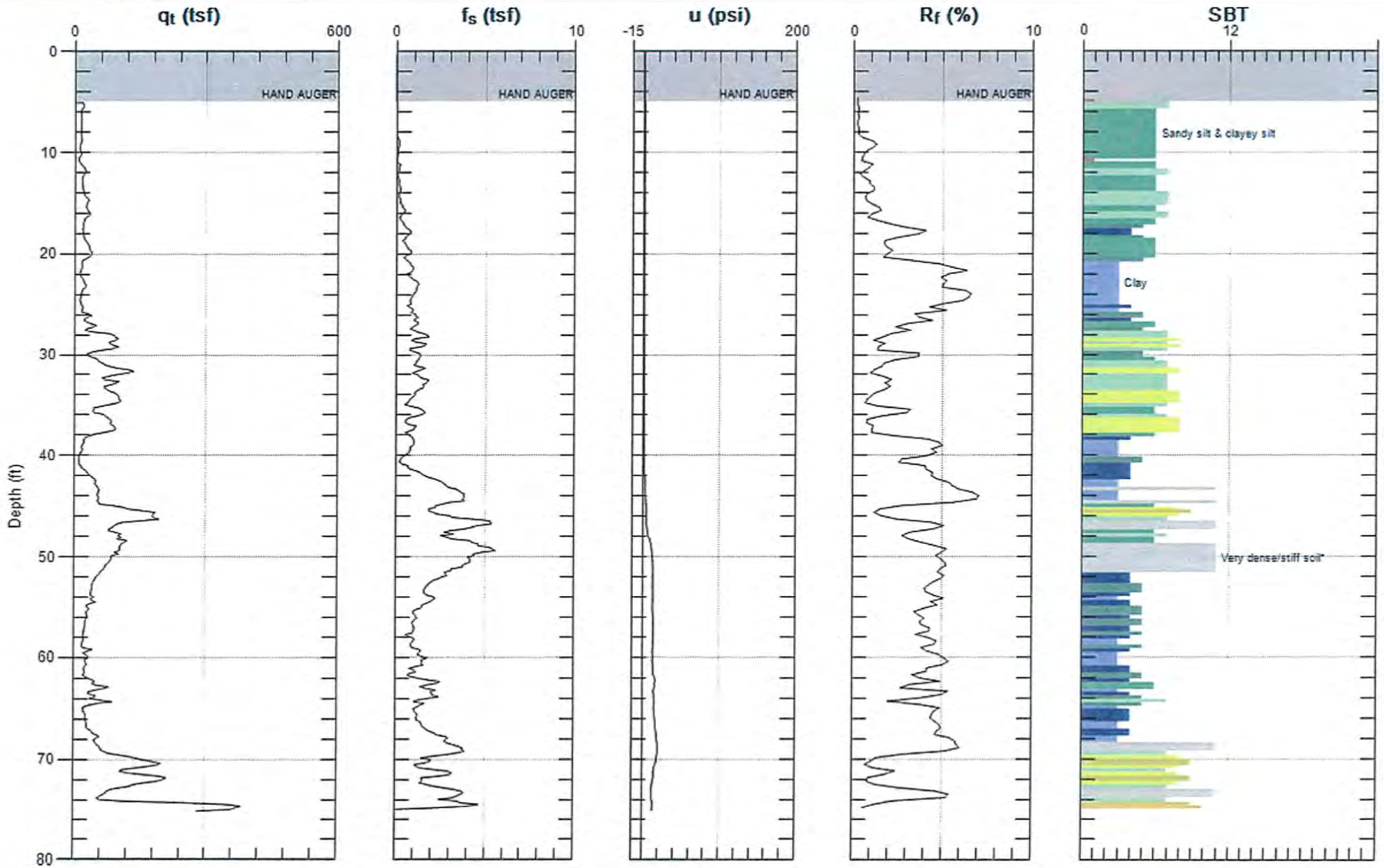

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SBT: Soil Behavior Type (Robertson 1990)

GREGG

NINYO & MOORE

Site: HOLLYWOOD COURT
Sounding: CPT-19

Engineer: J.BARTON
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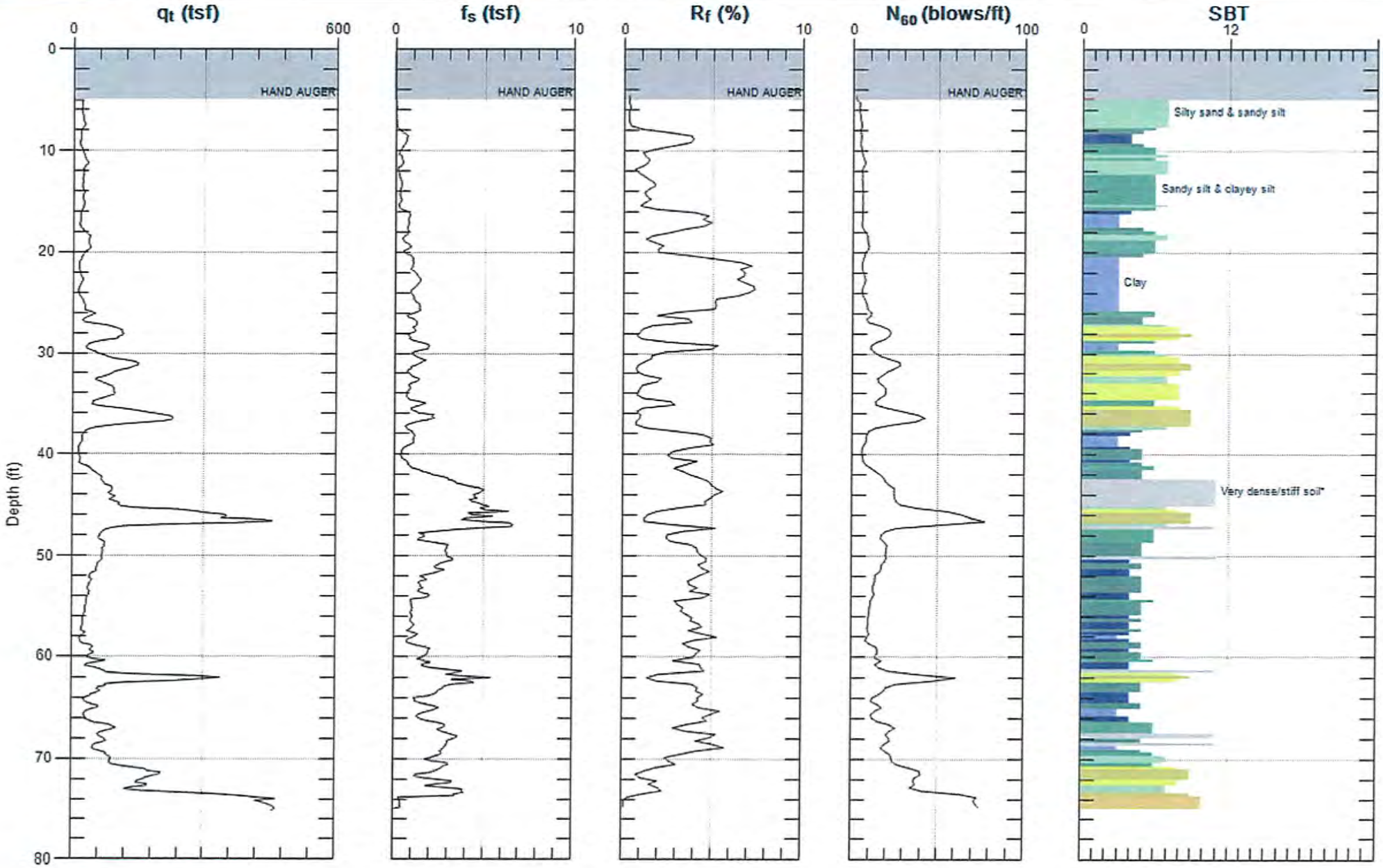

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Avg. Interval: 0.328 (ft)

SBT: Soil Behavior Type (Robertson 1990)

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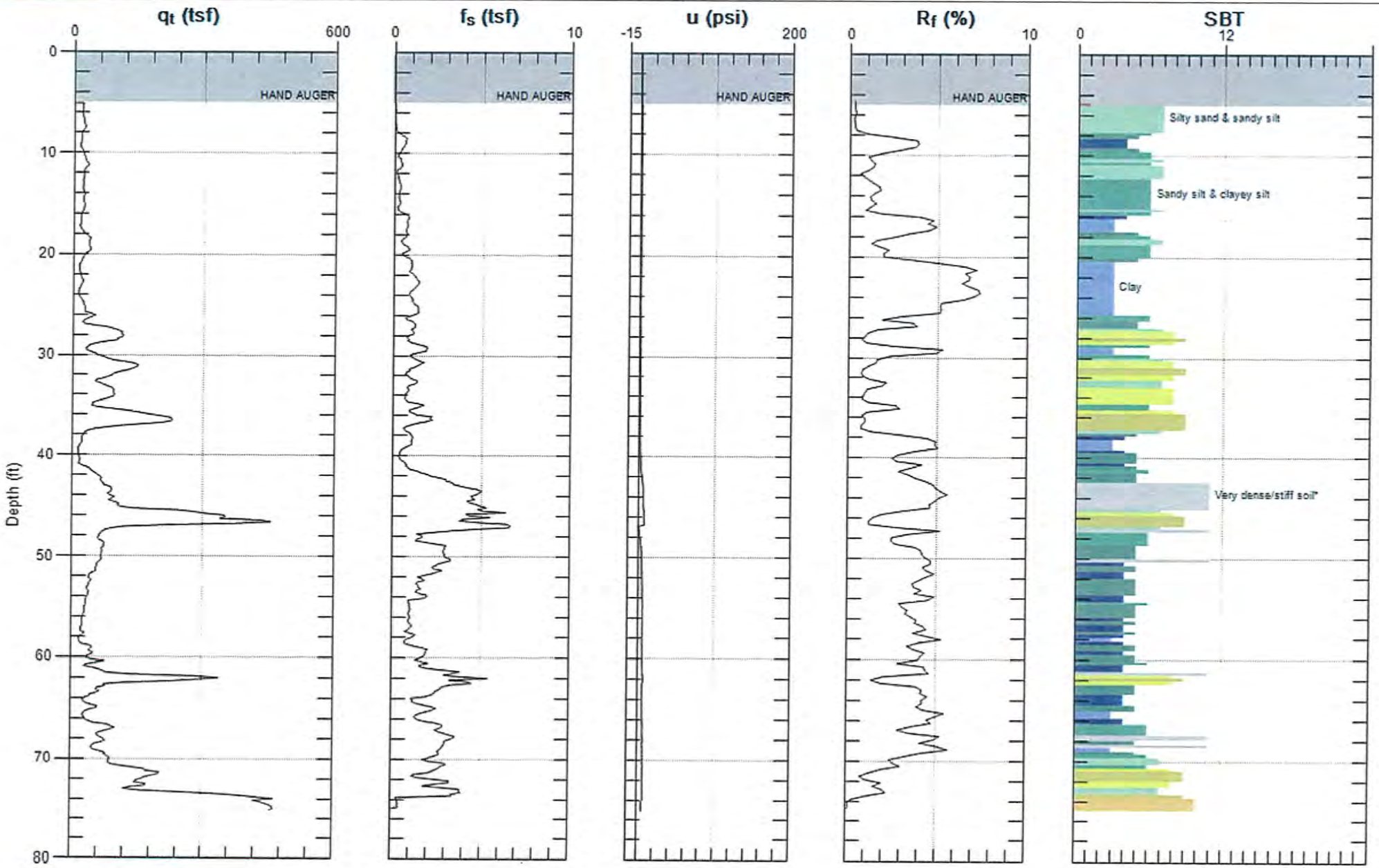

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SBT: Soil Behavior Type (Robertson 1990)

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Engineer: J.BARTON
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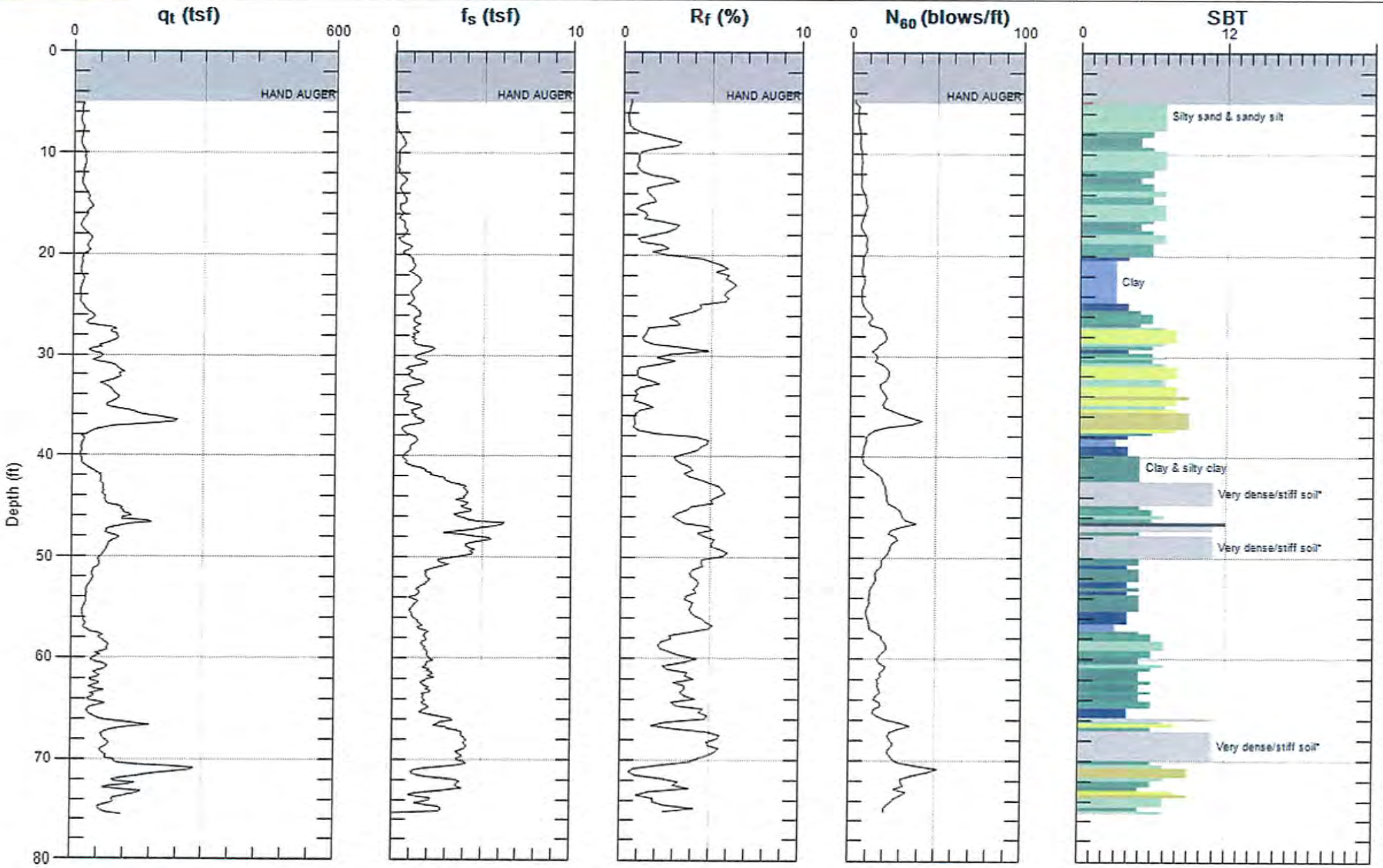

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SBT: Soil Behavior Type (Robertson 1990)

GREGG

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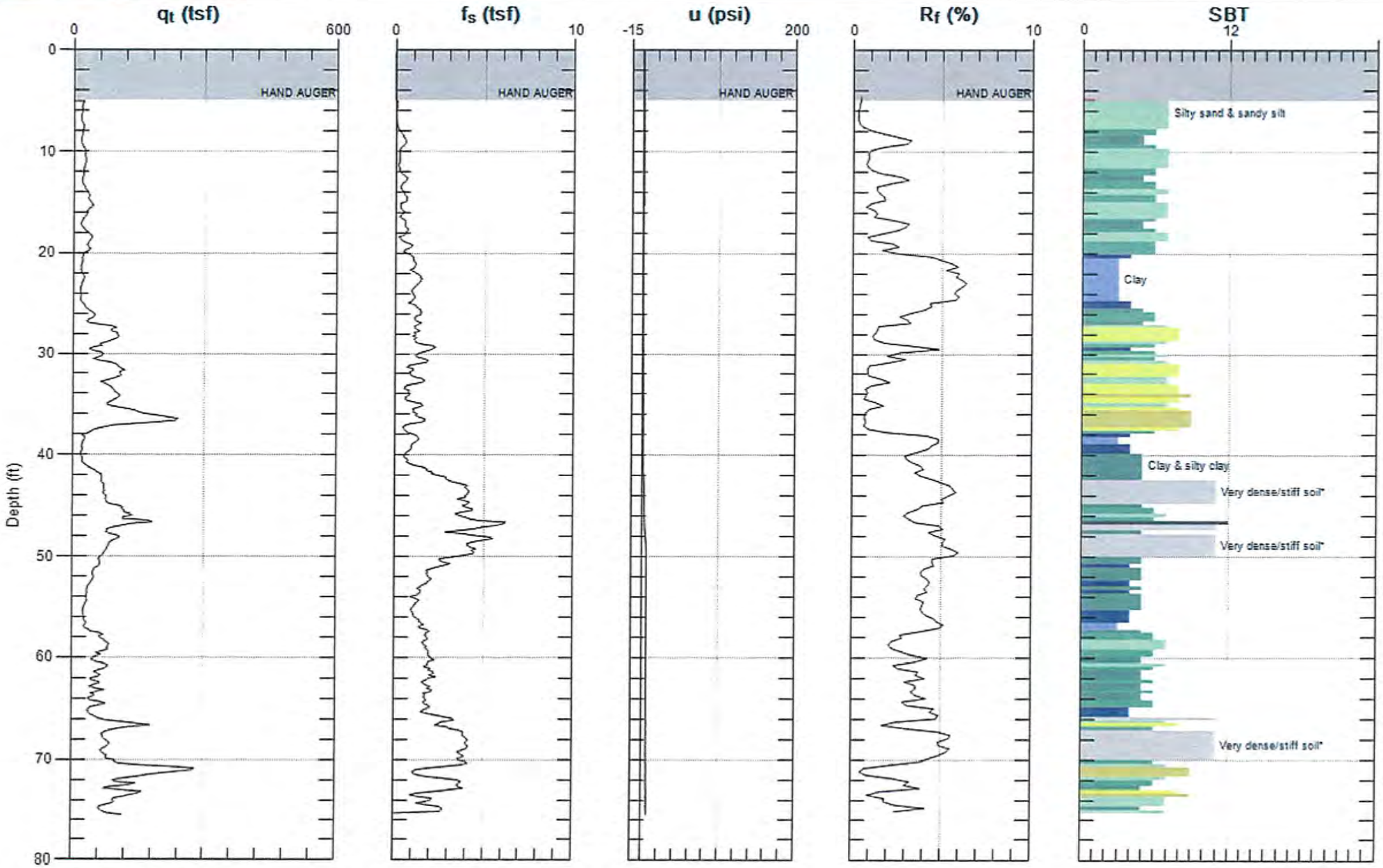

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Avg. Interval: 0.328 (ft)

SBT: Soil Behavior Type (Robertson 1990)

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NINYO & MOORE

Site: HOLLYWOOD COURT
Sounding: CPT-21

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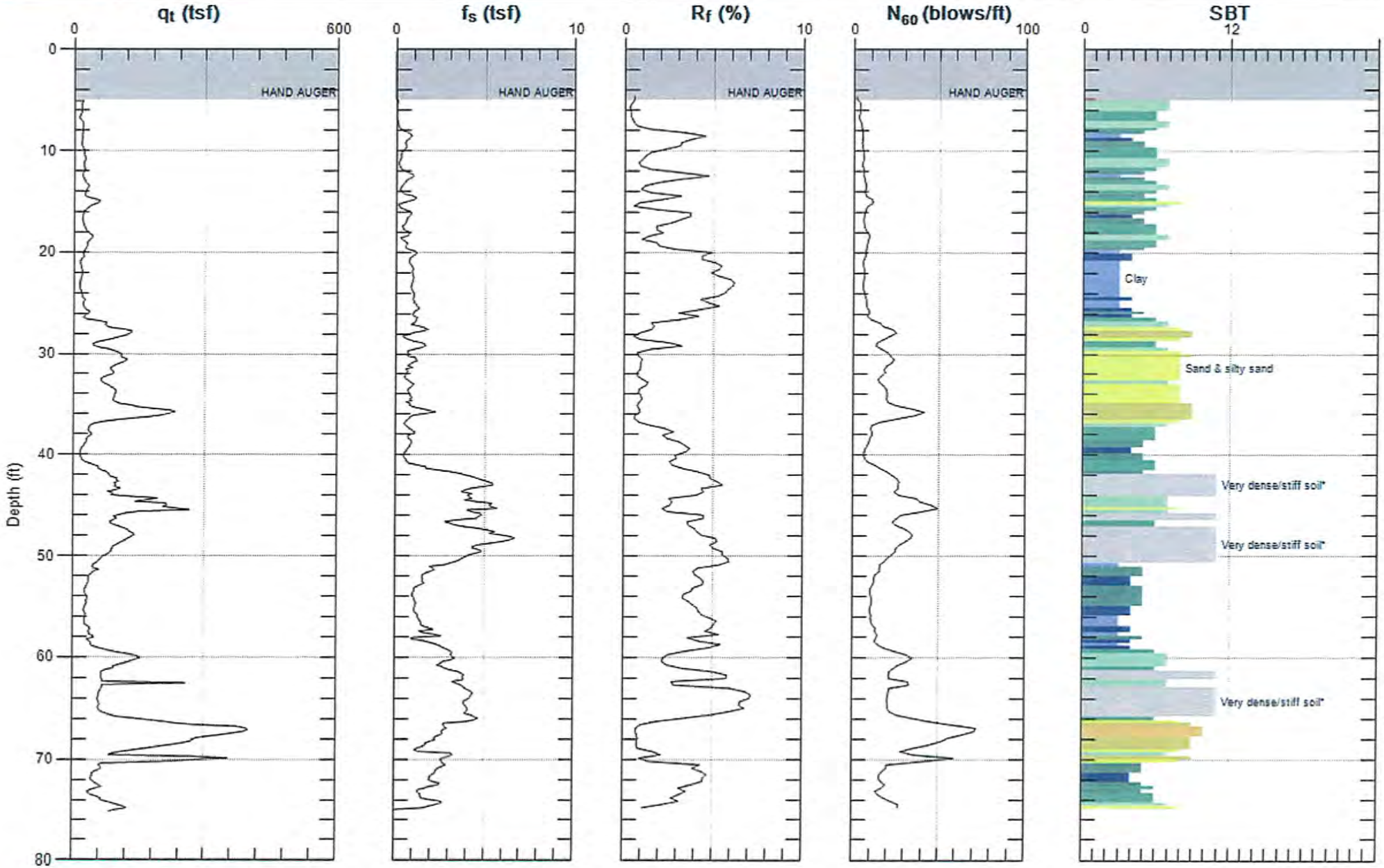
Date: 5/11/2015 07:38



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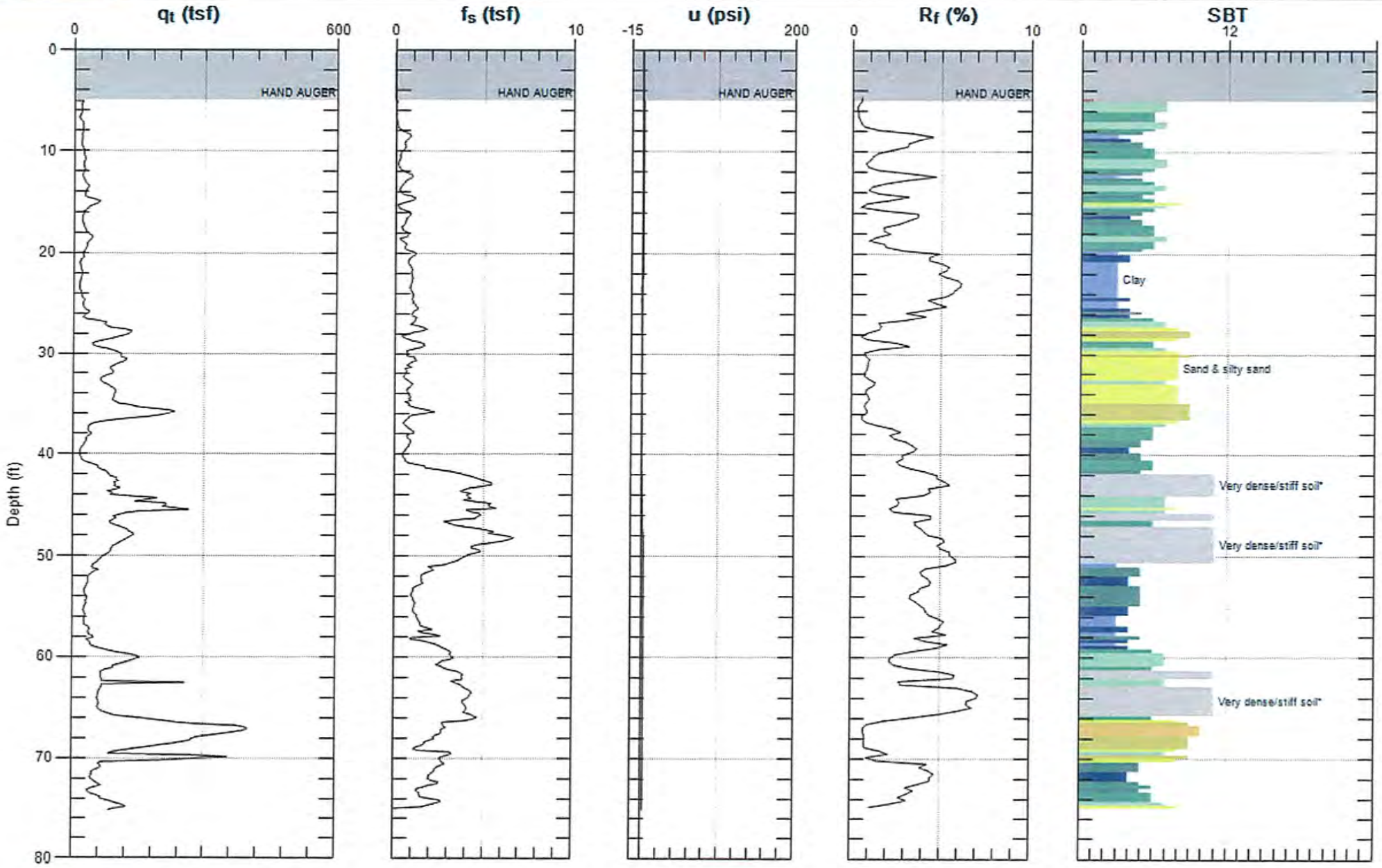

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SBT: Soil Behavior Type (Robertson 1990)

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Engineer: J.BARTON
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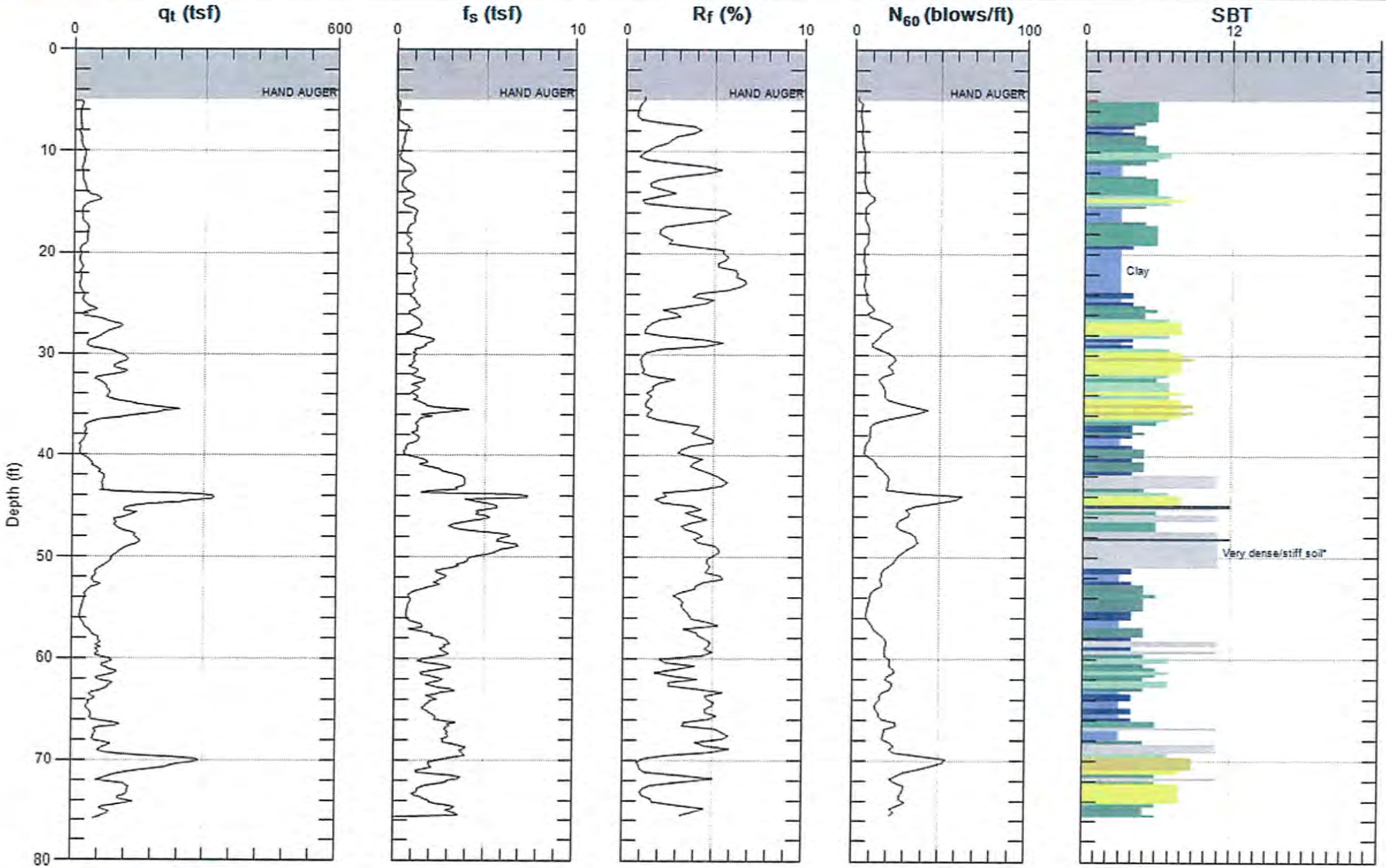

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SBT: Soil Behavior Type (Robertson 1990)

GREGG

NINYO & MOORE

Site: HOLLYWOOD COURT
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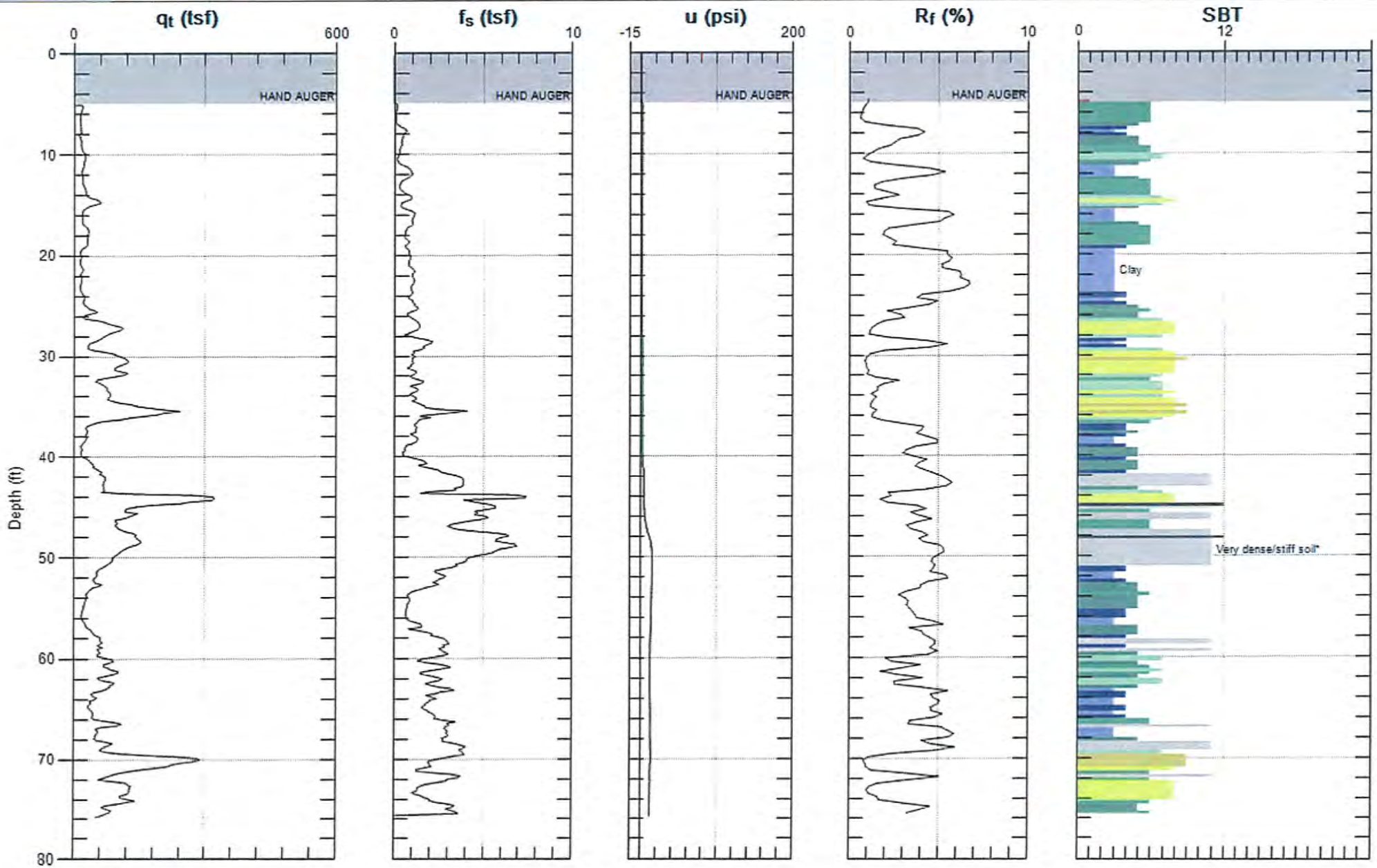
Engineer: J.BARTON
Date: 5/12/2015 11:03



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SBT: Soil Behavior Type (Robertson 1990)

GREGG

NINYO & MOORE

Site: HOLLYWOOD COURT
Sounding: CPT-23

Engineer: J.BARTON
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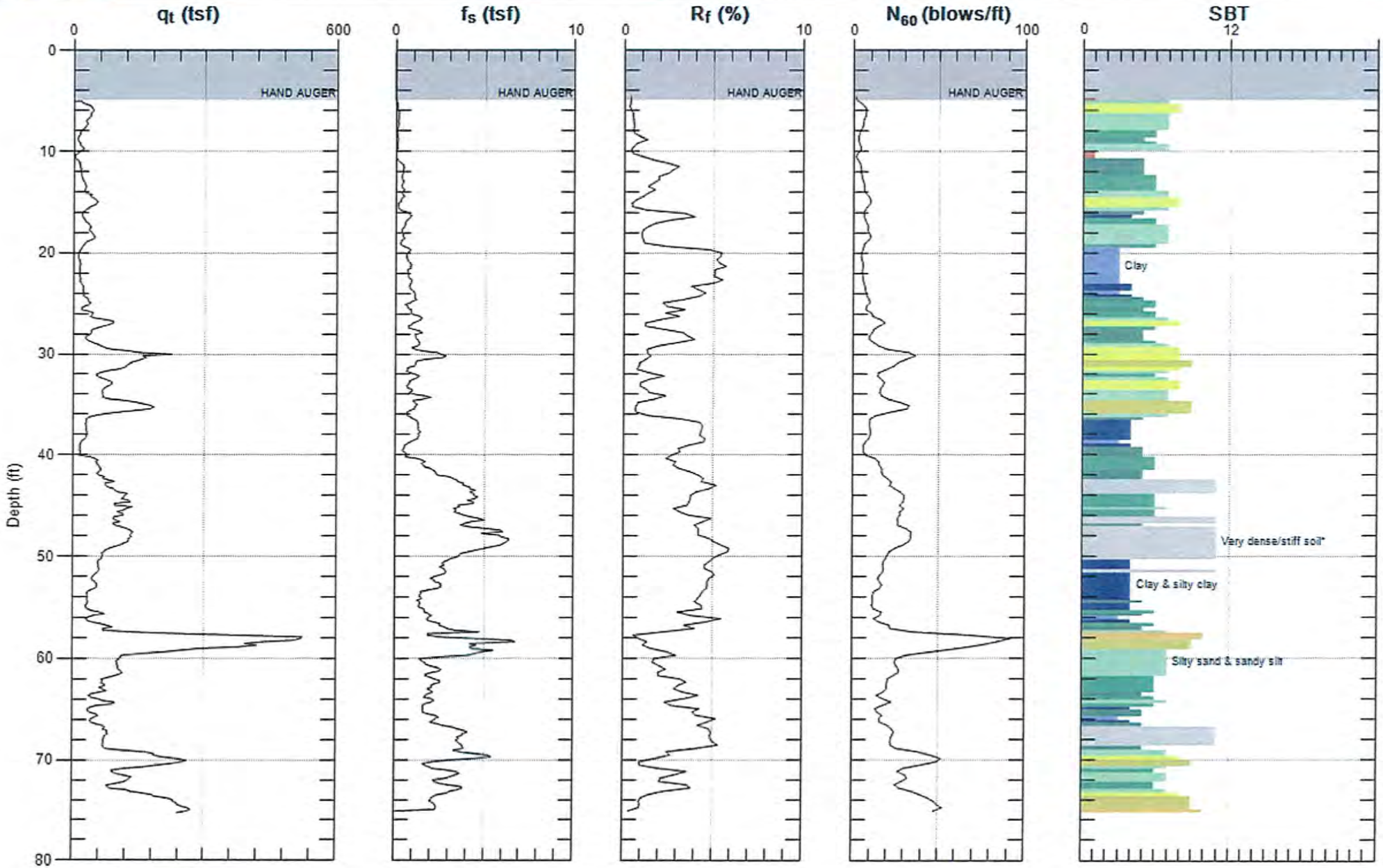

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SBT: Soil Behavior Type (Robertson 1990)

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NINYO & MOORE

Site: HOLLYWOOD COURT
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Engineer: J.BARTON
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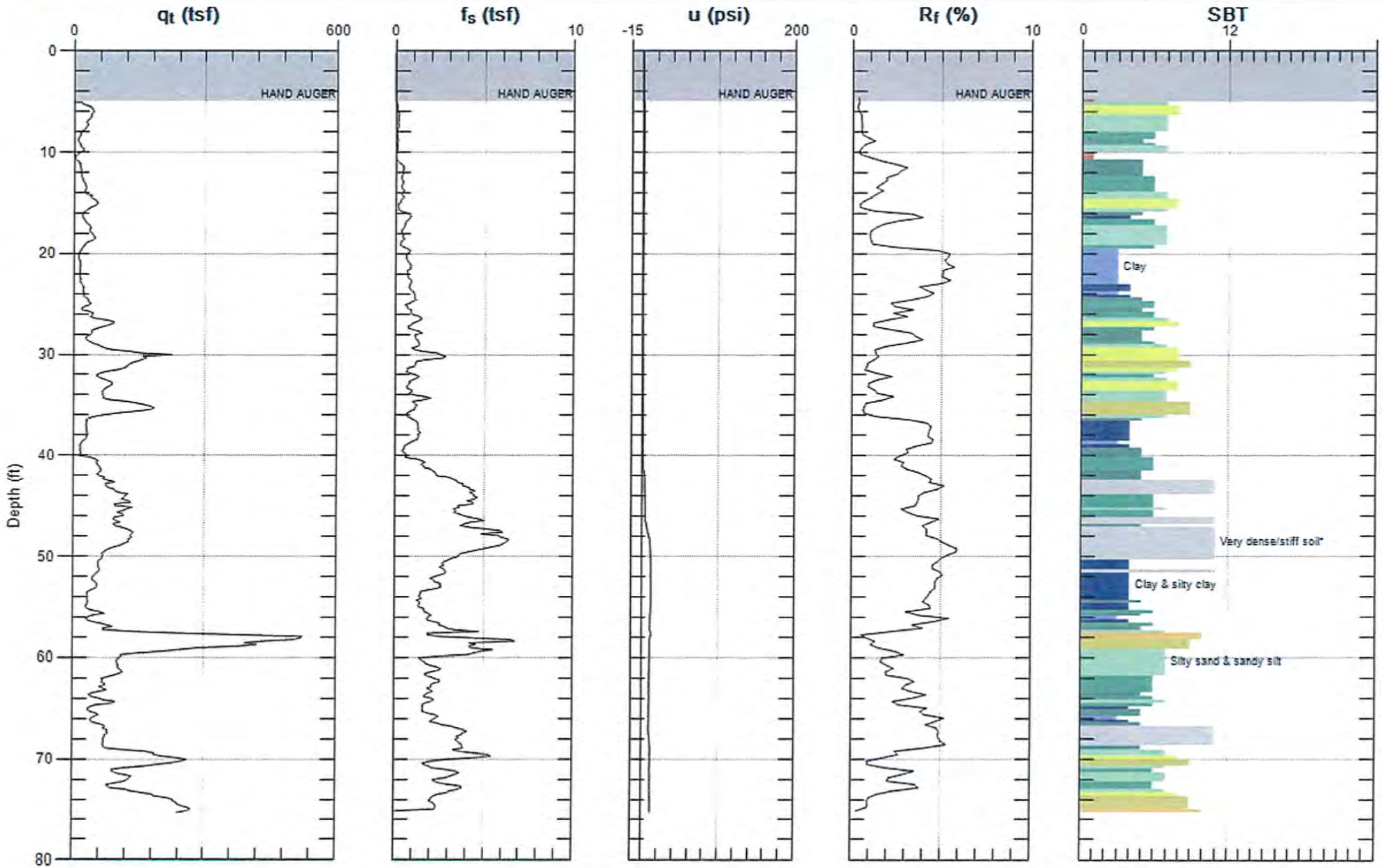

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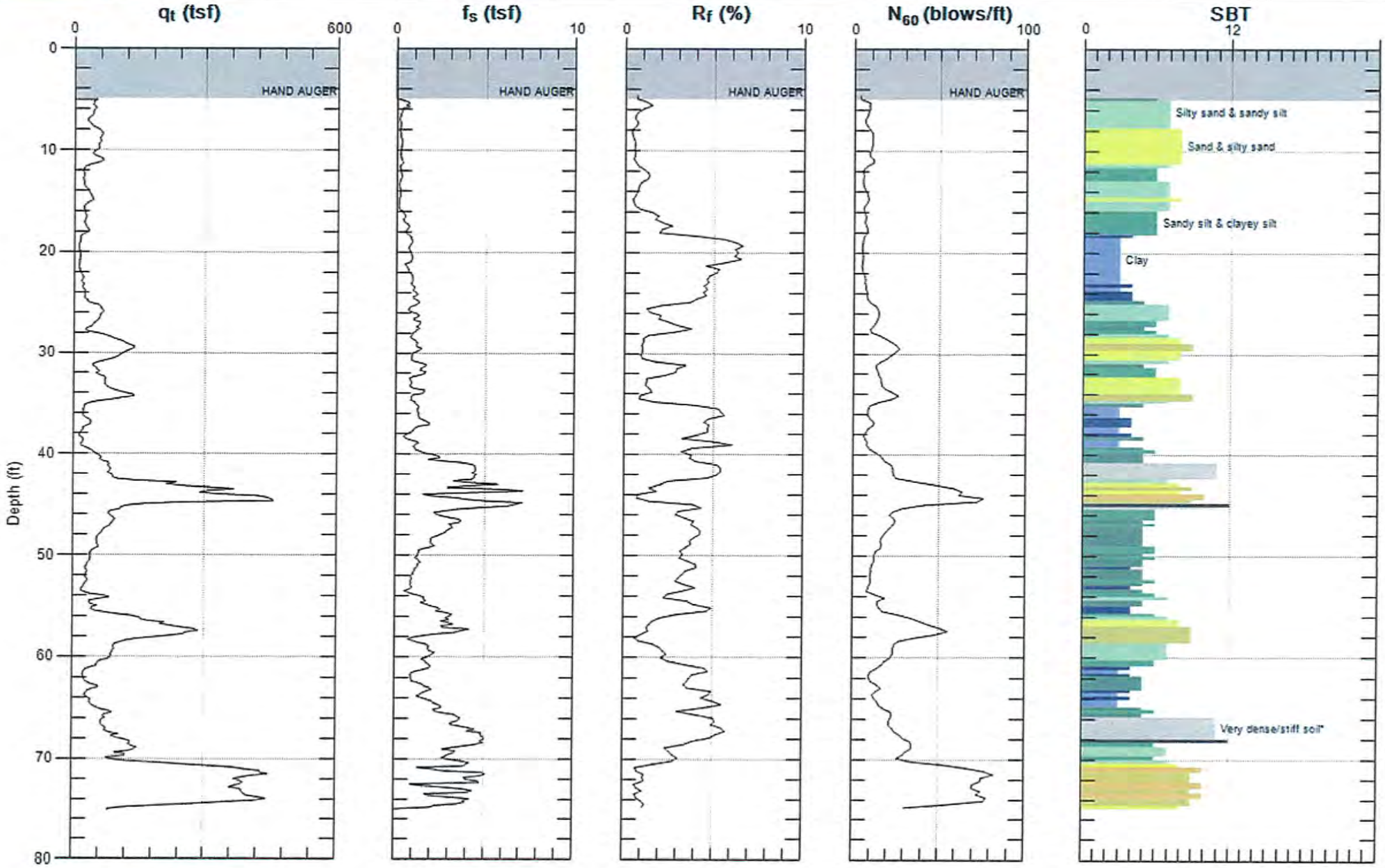
SBT: Soil Behavior Type (Robertson 1990)

GREGG

NINYO & MOORE

Site: HOLLYWOOD COURT
Sounding: CPT-24

Engineer: J.BARTON
Date: 5/12/2015 08:53



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Avg. Interval: 0.328 (ft)

SBT: Soil Behavior Type (Robertson 1990)

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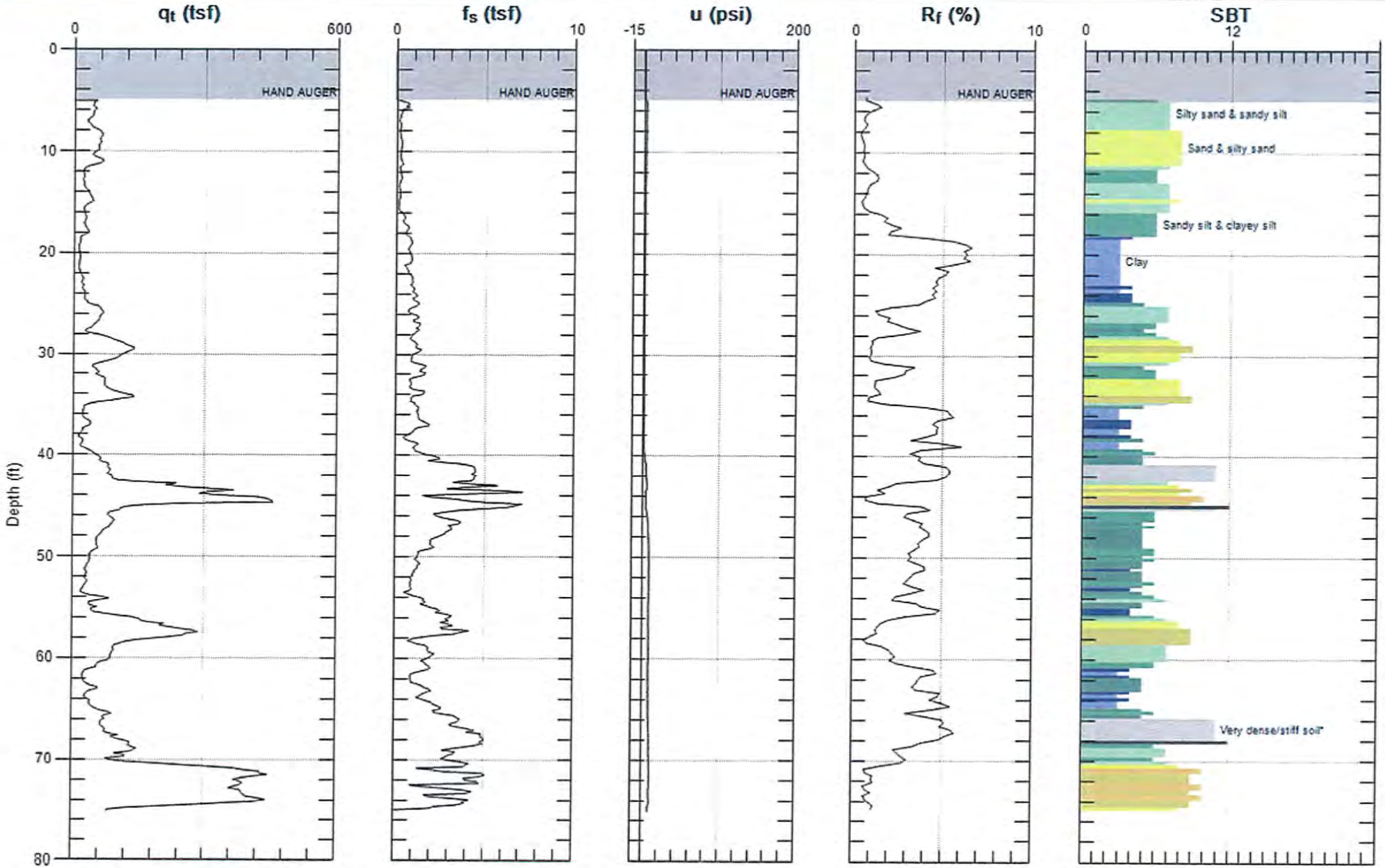
NINYO & MOORE

Site: HOLLYWOOD COURT
Sounding: CPT-24

Engineer: J.BARTON
Date: 5/12/2015 08:53



Max. Depth: 75.131 (ft)
Avg. Interval: 0.328 (ft)

SBT: Soil Behavior Type (Robertson 1990)

APPENDIX C

LABORATORY TESTING

In-Place Moisture and Density Tests

The moisture content and dry density of relatively undisturbed samples obtained from the exploratory excavations were evaluated in general accordance with ASTM D 2937. The test results are presented on the logs of the exploratory excavations in Appendix A.

200 Wash

An evaluation of the percentage of particles finer than the No. 200 sieve in selected soil samples was performed in general accordance with ASTM D 1140. The results of the tests are presented on Figures C-1.

Atterberg Limits

A test was performed on a selected representative fine-grained soil sample to evaluate the liquid limit, plastic limit, and plasticity index in general accordance with ASTM D 4318. The test results were utilized to evaluate the soil classification in accordance with the USCS. The test results and classification are shown on Figure C-2.

Consolidation Tests

Consolidation tests were performed on selected relatively undisturbed soil samples in general accordance with ASTM D 2435. The samples were inundated during testing to represent adverse field conditions. The percent of consolidation for each load cycle was recorded as a ratio of the amount of vertical compression to the original height of the sample. The results of the tests are summarized on Figures C-3 and C-4.

Proctor Density Tests

The maximum dry density and optimum moisture content of a selected representative soil sample were evaluated using the Modified Proctor method in general accordance with ASTM D 1557. The results of the test is summarized on Figure C-5.

Direct Shear Tests

Direct shear tests were performed on a remolded samples in general accordance with ASTM D 3080 to evaluate the shear strength characteristics of selected materials. The samples were inundated during shearing to represent adverse field conditions. The results are shown on Figure C-6.

Soil Corrosivity Tests

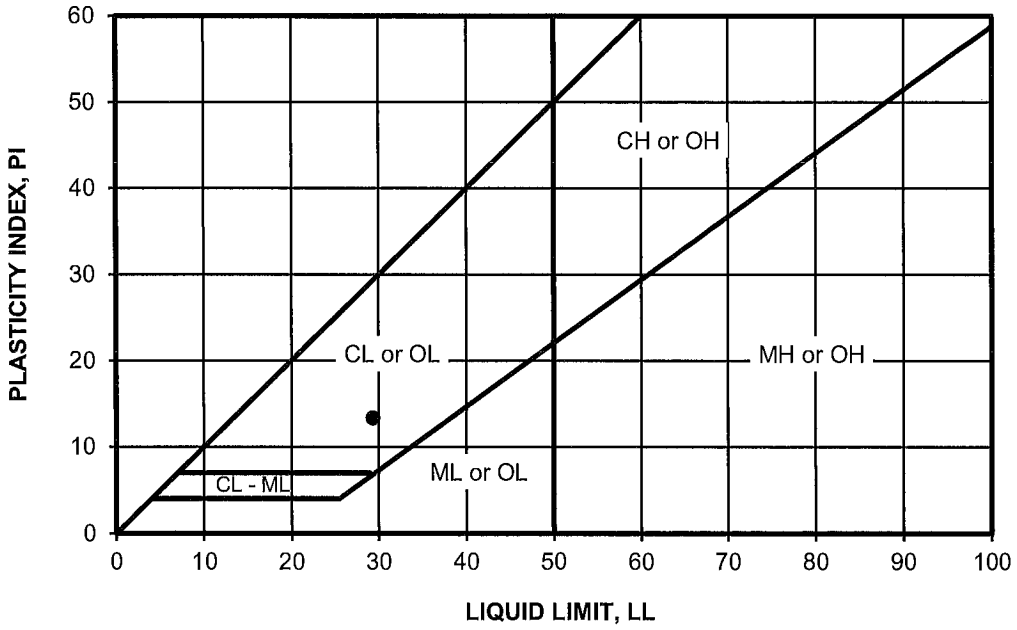
Soil pH, and resistivity tests were performed on representative samples of the on-site soils in general accordance with CT 643. The soluble sulfate and chloride content of selected samples were evaluated in general accordance with CT 417 and CT 422, respectively. The test results are presented on Figure C-7.

SAMPLE LOCATION	SAMPLE DEPTH (FT)	DESCRIPTION	PERCENT PASSING NO. 4	PERCENT PASSING NO. 200	USCS (TOTAL SAMPLE)
B-1	5.0-6.5	CLAYEY SAND	95	36	SC
B-1	41.0-41.5	SANDY CLAY	97	60	CL
B-2	1.0-5.0	CLAYEY SAND	94	34	SC

PERFORMED IN GENERAL ACCORDANCE WITH ASTM D 1140

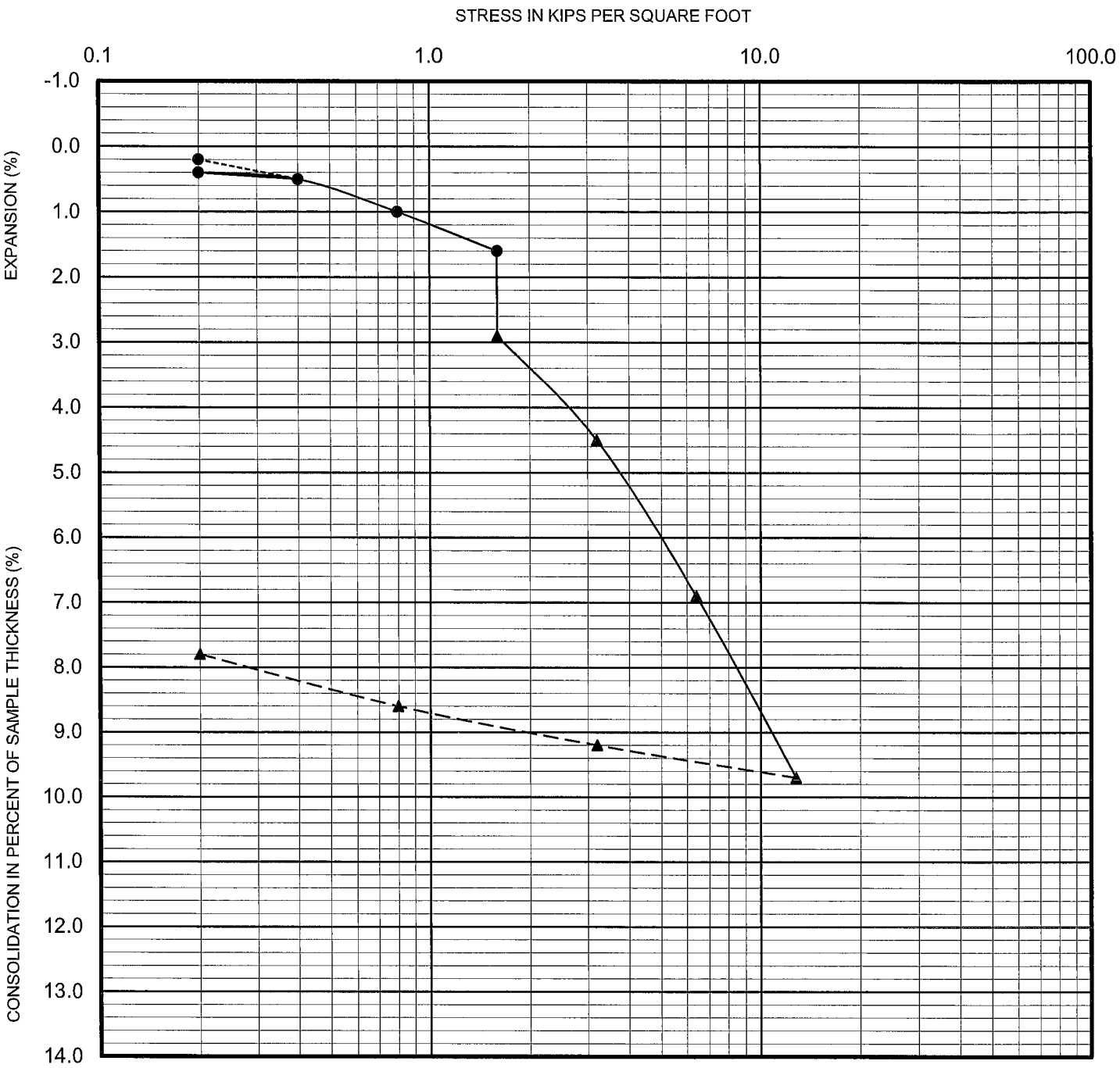
Ninyo & Moore	NO. 200 SIEVE ANALYSIS	FIGURE
PROJECT NO. 402132007 / DATE 6/15	HOLLYWOOD COURTHOUSE 5925 HOLLYWOOD BOULEVARD LOS ANGELES, CALIFORNIA	C-1

SYMBOL	LOCATION	DEPTH (FT)	LIQUID LIMIT, LL	PLASTIC LIMIT, PL	PLASTICITY INDEX, PI	USCS CLASSIFICATION (Fraction Finer Than No. 40 Sieve)	USCS (Entire Sample)
●	B-2	25.0-26.5	29	16	13	CL	CL



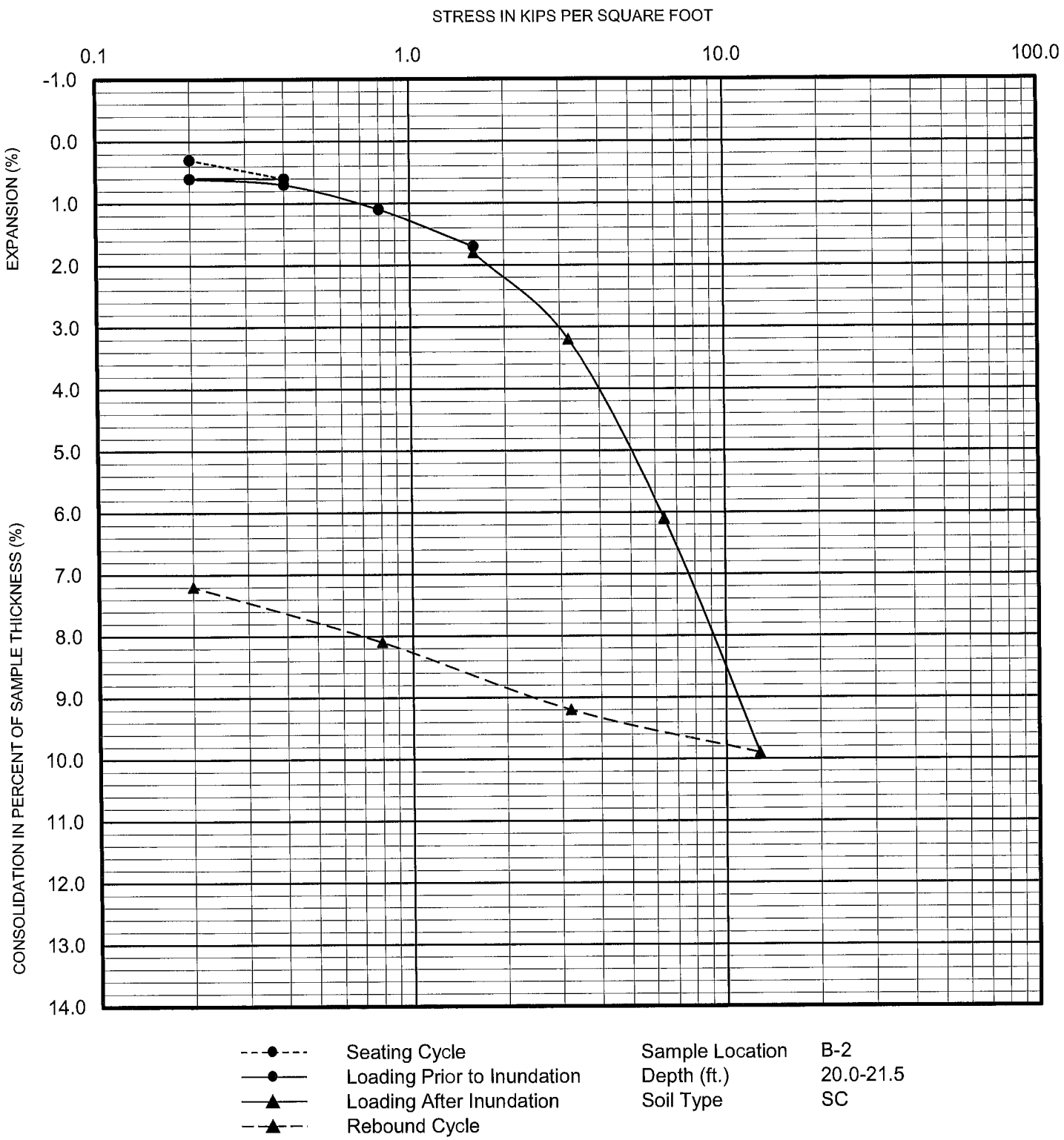
PERFORMED IN GENERAL ACCORDANCE WITH ASTM D 4318

Ninyo & Moore	ATTERBERG LIMITS TEST RESULTS	FIGURE
PROJECT NO. 402132007 / DATE 6/15	HOLLYWOOD COURTHOUSE 5925 HOLLYWOOD BOULEVARD LOS ANGELES, CALIFORNIA	C-2



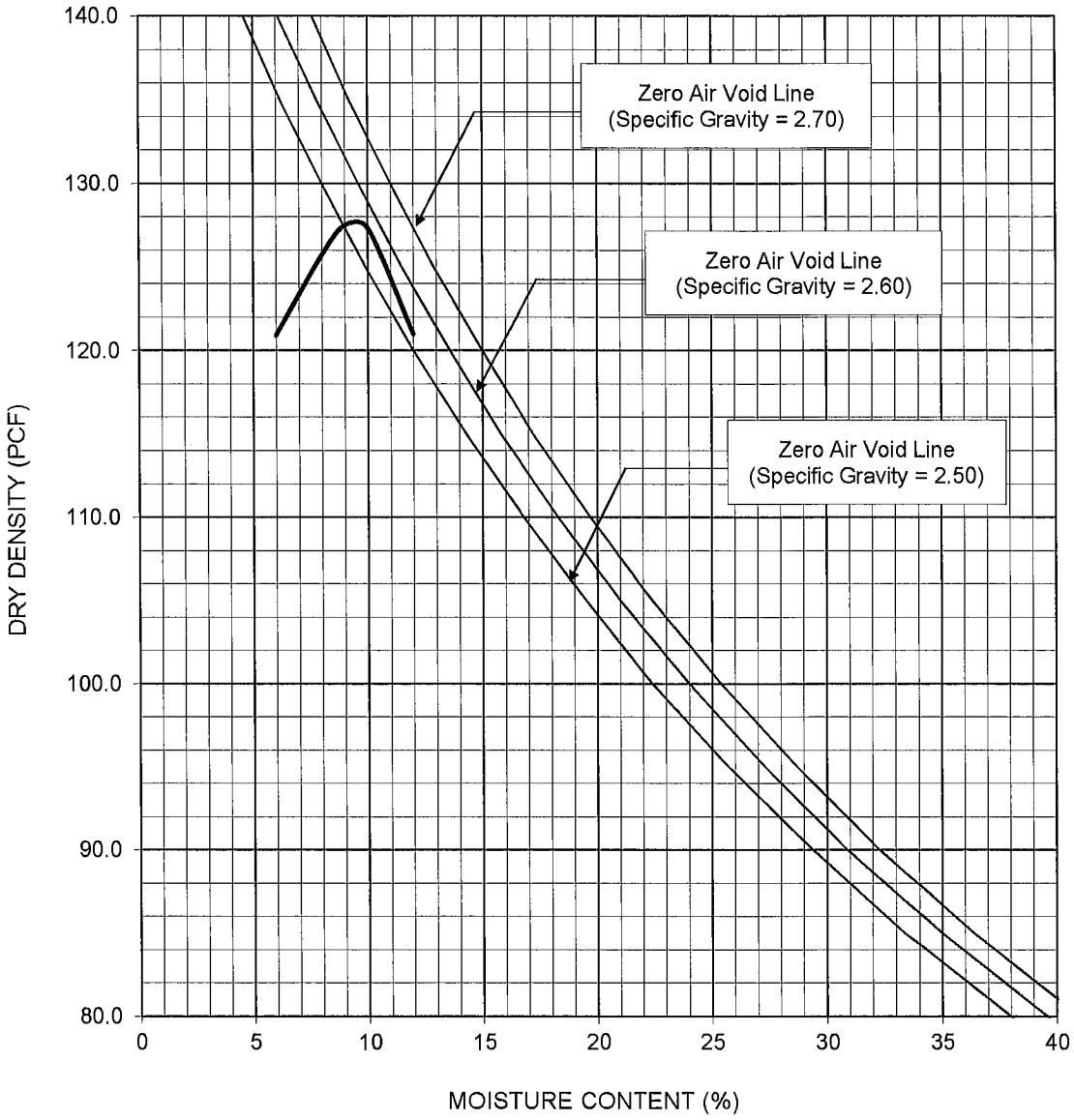
PERFORMED IN GENERAL ACCORDANCE WITH ASTM D 2435

Ninyo & Moore	CONSOLIDATION TEST RESULTS	FIGURE
PROJECT NO. 402132007 / DATE 6/15	HOLLYWOOD COURTHOUSE 5925 HOLLYWOOD BOULEVARD LOS ANGELES, CALIFORNIA	C-3



PERFORMED IN GENERAL ACCORDANCE WITH ASTM D 2435

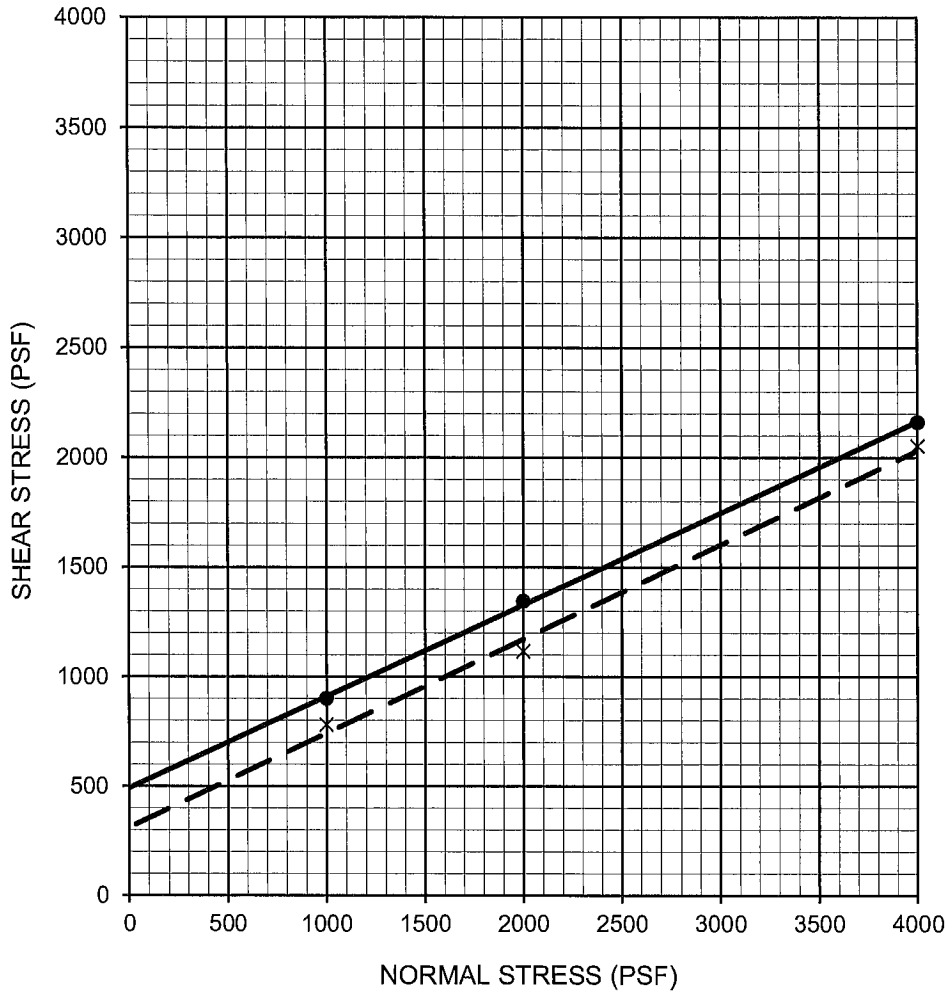
Ninyo & Moore	CONSOLIDATION TEST RESULTS	FIGURE
PROJECT NO. 402132007 / DATE 6/15	HOLLYWOOD COURTHOUSE 5925 HOLLYWOOD BOULEVARD LOS ANGELES, CALIFORNIA	C-4



Sample Location	Depth (ft)	Soil Description	Maximum Dry Density (pcf)	Optimum Moisture Content (%)
B-2	1.0-5.0	BROWN CLAYEY SAND	127.5	9.0
Dry Density and Moisture Content Values Corrected for Oversize (ASTM D 4718-87)				

PERFORMED IN GENERAL ACCORDANCE WITH ☑ ASTM D 1557 ☐ ASTM D 698 METHOD ☐ A ☑ B ☐ C

Ninyo & Moore	PROCTOR DENSITY TEST RESULTS	FIGURE
PROJECT NO. 402132007 / DATE 6/15	HOLLYWOOD COURTHOUSE 5925 HOLLYWOOD BOULEVARD LOS ANGELES, CALIFORNIA	C-5



Description	Symbol	Sample Location	Depth (ft)	Shear Strength	Cohesion, c (psf)	Friction Angle, ϕ (degrees)	Soil Type
CLAYEY SAND	—●—	B-2	1.0-5.0	Peak	492	23	SC
CLAYEY SAND	- - X - -	B-2	1.0-5.0	Ultimate	312	23	SC

PERFORMED IN GENERAL ACCORDANCE WITH ASTM D 3080 ON A SAMPLE REMOLDED TO 90% RELATIVE COMPACTION.

Ninyo & Moore	DIRECT SHEAR TEST RESULTS	FIGURE
PROJECT NO. / DATE	HOLLYWOOD COURTHOUSE 5925 HOLLYWOOD BOULEVARD LOS ANGELES, CALIFORNIA	C-6
402132007 / 6/15		

SAMPLE LOCATION	SAMPLE DEPTH (FT)	pH [1]	RESISTIVITY [1] (Ohm-cm)	SULFATE CONTENT [2]		CHLORIDE CONTENT [3] (ppm)
				(ppm)	(%)	
B-1	15.0-20.0	7.6	1,100	120	0.012	45
B-2	1.0-5.0	7.7	2,745	20	0.002	30

[1] PERFORMED IN GENERAL ACCORDANCE WITH CALIFORNIA TEST METHOD 643
[2] PERFORMED IN GENERAL ACCORDANCE WITH CALIFORNIA TEST METHOD 417
[3] PERFORMED IN GENERAL ACCORDANCE WITH CALIFORNIA TEST METHOD 422

Ninyo & Moore	CORROSIVITY TEST RESULTS	FIGURE
PROJECT NO. 402132007 / DATE 6/15	HOLLYWOOD COURTHOUSE 5925 HOLLYWOOD BOULEVARD LOS ANGELES, CALIFORNIA	C-7

Exhibit D

Two LADBS memos authored by Daniel Schneidereit, Engineering Geologist II, Los Angeles Department of Building and Safety, including August 7, 2020 Inter-Departmental Correspondence for the Hollywood Center project that is proposed to be built in the proposed Regional Center CPIO Subarea of the Plan Update

CITY OF LOS ANGELES
CALIFORNIA

DEPARTMENT OF
BUILDING AND SAFETY
201 NORTH FIGUEROA STREET
LOS ANGELES, CA 90012

OSAMA YOUNAN, P.E.
GENERAL MANAGER
SUPERINTENDENT OF BUILDING

JOHN WEIGHT
EXECUTIVE OFFICER

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

August 7, 2020

To: Luciralia Ibarra, Principle City Planner
Department of City Planning

From: Daniel Schneidereit, Engineering Geologist II
Department of Building and Safety

Subject: The California Geological Survey's Comments Regarding the Hollywood Center Fault Investigation

At the request of the Department of City Planning the Department of Building and Safety has reviewed a July 16, 2020 letter by the California Geological Survey (CGS) that concerns the proposed Hollywood Center development (Vesting Tentative Tract 82152). The CGS states they have new data they believe indicate there may be an active fault traversing the southerly portion of the site.

We acknowledge the CGS's concern and believe the best way to resolve this issue is for the developer to excavate another exploratory trench to demonstrate, or rule out, the presence of an active fault in the southerly part of the site. The trench needs to be approximately 30 feet deep or more to expose the necessary strata, and may require the use of shoring.

It is our understanding that the geologic consultants for the project are currently working on a scope of work for a trench. As part of the review, the Department of Building and Safety will ensure there will be transparency with the CGS, by requesting the CGS geologists to observe the trench and verify the exploration results.

Please contact me if you have further questions.
Thank you.

DCS

CITY OF LOS ANGELES
CALIFORNIA

DEPARTMENT OF
BUILDING AND SAFETY
201 NORTH FIGUEROA STREET
LOS ANGELES, CA 90012

OSAMA YOUNAN, P.E.
GENERAL MANAGER
SUPERINTENDENT OF BUILDING

JOHN WEIGHT
EXECUTIVE OFFICER

GEOLOGY REPORT REVIEW LETTER

September 9, 2020

LOG # 114063 & 114169
SOILS/GEOLOGY FILE - 2
AP

MACF Vine LLC; 1740 N. Vine St. LLC; 1749 N. Vine St. LLC; 1770 Ivar LLC; 1733 N. Argyle LLC
c/o Mayor Brown
350 S. Grand Ave., 25th Fl.
Los Angeles, CA 90071-1503

TRACT:	Hollywood (MR 28-59/60) / Central Hollywood Tract No. 2 (MP 6-144) / 18237
BLOCK:	21 / --- / ---
LOT(S):	19 (Arb 1), 20 (Arbs 1 & 2), 21 (Arbs 1 & 2), 2 (Arb 1), 5 (Arb1), 4 (Arbs 1 & 2), 3, FR 2 (Arb 1) / FR 6, LT 1 (Arb 4), 12 (Arb 1), FR 13 (Arbs 2 & 3) / LT 1 (Arb 2), LT 1, Arb 3
LOCATION:	1745-1749, 1751, 1753, 1770 N. Vine St., 1746-1748, 1754, 1760-1764 Ivar Ave., (1770 N. Ivar Ave. - 6334 Yucca Ave. / 1720-1724, 1730, 1760-1768 Vine St., (1770 N. Vine St. -6270 Yucca Ave.) / (1740-1750 N. Vine St. - 6236 W. Yucca Ave.), 1733-1741 N. Argyle Ave.

CURRENT REFERENCE REPORT/LETTER(S)	REPORT No.	DATE OF DOCUMENT	PREPARED BY
Addendum Report	LA1301D	07/28/2020	Group Delta
Addendum Report	2077-77	07/06/2020	Feffer Geological Consulting

PREVIOUS REFERENCE REPORT/LETTER(S)	REPORT No.	DATE OF DOCUMENT	PREPARED BY
Dept. Approval Letter	109547	10/15/2019	LADBS
Geology/Soils Report	2077-77	09/23/2019	Feffer Geological Consulting
Dept. Approval Letter	109310	08/09/2019	LADBS
Geology Report	LA1301A	07/19/2019	Group Delta
Dept. Approval Letter	87496	07/07/2015	LADBS
Geologic Response Report	3425	06/03/2015	Earth Consultants International
Geologic Response Letter	LA-1191 A	05/17/2015	Group Delta
Third Party Review	3425	03/09/2015	Earth Consultants International
Geology Report	LA-1191 A	03/06/2015	Group Delta

The Grading Division of the Department of Building and Safety has reviewed the referenced addendum reports that concerns a proposed project of mixed-use buildings with subterranean parking levels. The Department previously conditionally approved the above previous referenced reports for the proposed project in the approval letters referenced above. The addendum reports address an alternative (Alternative 8) for the project, which is similar to that discussed in the 09/23/2019 report by Feffer Geological Consulting (Feffer). According to the 07/06/2020 Feffer report, Alternative 8 consists of a 17-story

development with seven subterranean levels on the East Site, and a 48-story and a 13-story development with five subterranean levels on the West Site. Maximum anticipated depths of excavations are 64 feet on the East Site and 60 feet on the West Site. This alternative does not alter the geologic and geotechnical issues addressed in the previous reports. A design level geotechnical report will be required prior to issuing building permits.

As discussed in an Inter-Departmental Correspondence by the Department of Building and Safety (DBS) to the Department of City Planning (DCP), dated 08/07/2020, the California Geological Survey (CGS) has issued a letter dated 07/16/2020 that concerns the possibility of an active fault traversing the southerly portion of the site. As such, a geologic fault exploration trench shall be excavated in the suspected area to demonstrate, or rule out, the presence of an active fault prior to the DBS' approval of this project.

Daniel C Schneidereit

DANIEL C. SCHNEIDEREIT
Engineering Geologist II

DCS/dcs
Log No. 114063 & 114169
213-482-0480

cc: Group Delta, Project Consultant
Feffer Geological Consulting, Project Consultant
LA District Office

Exhibit E

Robert Sydnor expert letter

Robert Hadley Sydnor, F-GSA
Engineering Geologist, Hydrogeologist, and Seismologist
4930 Huntridge Lane, Fair Oaks, California 95628-4823
cell phone: 916-335-1441 RHSydnor @gmail.com

September 1, 2020

VIA EMAIL vince.bertoni@lacity.org;
mindy.nguyen@lacity.org
Vincent Bertoni, Planning Director
Mindy Nguyen, City Planner
Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

VIA EMAIL daniel.schneidereit@lacity.org
Daniel Schneidereit, Engineering Geologist
Los Angeles Department of Building & Safety
221 North Figueroa Street, Suite 1200
Los Angeles, CA 90012

VIA EMAIL Steve.Bohlen@conservation.ca.gov
Steve Bohlen, Acting State Geologist
801 K Street, MS 12-31
Sacramento, CA 95814

Subject: **Engineering Geology Comments regarding:**
Hollywood Center, *formerly known as:* Millennium high-rise development, located at 1720 North Vine Street, Hollywood district, City of Los Angeles. Vesting Tentative Tract 82152. Hollywood Center Project, Case No. ENV-2018-2116-EIR, SCH 2018051002.

Dear Mr. Bertoni, Ms. Nguyen, Mr. Schneidereit, and Mr. Bohlen:

References:

California Geological Survey letter-report dated **July 16, 2020**, Comments on the April 16, 2020, Draft Environmental Impact Report for the proposed "Hollywood Center" project, State Clearinghouse # 2018-051002, 7 pages.

Attorney Edgar Khalatian letter regarding Hollywood Center, dated **August 25, 2020**, 8 pages.

Los Angeles City Geologist Daniel Carl Schneidereit, PG 5158, CHG 329, CEG 1621; Letter dated August 7, 2020 to Los Angeles City Principal Planner Luciralia Ibarra, asking for **additional fault trenching** studies for the proposed Hollywood Center.

Dr. Rufus Catchings, Ph.D., and other geologists and geophysicists, May 8, 2020, **USGS-CGS fault-imaging surveys across the Hollywood and Santa Monica Faults, Los Angeles County,** USGS Open-File Report 2020-1049, 7 pages.

Robert Hadley Sydnor, CEG #968, two-page letter to the State Geologist dated July 11, 2013, urging the California Geological Survey to **officially zone the Hollywood Fault** as an **active fault** under provisions of the Alquist-Priolo Earthquake Fault Zoning Act. *(This was soon accomplished.)*

1. The **California Geological Survey** letter of July 16, 2020 is **excellent, competent, and well-prepared** by a senior-level team of experienced Certified Engineering Geologists. It is based on a number of data sets and reports, including **entirely *new* subsurface data from the United States Geological Survey** (USGS OFR 2020-1049, dated May 8, 2020, issued *after* release of the April 16, 2020 Draft EIR) that was *not* previously available to anyone. This new insightful subsurface data which indicated potentially four (4) fault traces crossing the proposed development site will help with accurate legal zonation of the Hollywood Fault; assist developers (present and future) to perceive the location(s) of active fault splays; and will help the Los Angeles City Geologist and City Planning to evaluate present (and future) Environmental Impact Reports for proposed development in Hollywood.

   Because both the California Geological Survey's July 16, 2020 letter and the United States Geological Survey's May 8, 2020 report post-date the Draft EIR, and because both contain significant new and additional data or other information directly bearing on the current Draft EIR, a new Draft EIR must be circulated. Without this new information from two independent agencies (one state, and one federal) being included in a new Draft EIR, which information is uniquely pertinent to the precise property at issue in the Hollywood Center proposal, the current Draft EIR suffers from a fundamental inadequacy that precludes meaningful public and other agency review and comment.

2. **Guided geophysical waves along a fault plane** is a well-known, accepted, and state of the art method for discerning earthquake fault planes. The lead author, Dr. Rufus Catchings, is a Ph.D. geophysicist from Stanford University, with over three decades of public service at the U.S. Geological Survey, and dozens of peer-reviewed publications in national seismology journals. The U.S. Geological Survey is an expert and neutral scientific federal survey that is not for or against any development project. Their May 8, 2020 geophysical study identified several new splays of the known-active Hollywood Fault. This is highly pertinent to the proposed Hollywood Center and its Draft EIR because several north-dipping fault splays appear to intersect the project's planned high-rise foundations. This could "cause substantial adverse effects on human beings, either directly or indirectly" (CEQA Guidelines Section 15065(a)(4)), and also on the surrounding environment including to humans, other buildings, and streets and infrastructure if the proposed towers were to collapse due to seismic uplift or intense ground shaking.

3. The **Los Angeles City Geologist, Dan Schneidereit, C.E.G.,** has asked in writing on August 7, 2020 for **new fault trenching** by the developers of Hollywood Center, based on the California Geological Survey's July 16, 2020 comments and the new U.S. Geological Survey report dated May 8, 2020. This new phase of subsurface geology work will reportedly be soon underway, and most assuredly should be. It is strongly recommended that new fault investigation and trenching be performed by a highly qualified, neutral and independent firm that is not paid by, or connected to, either the developer or its affiliates, or the City of Los Angeles.

4. All parties should **patiently abide**; and await entirely **new field-data from subsurface fault trenching**. Final scholarly judgements should be based on latest subsurface geological data prepared by Certified Engineering Geologists; and not broadside emotional opinions as contained in the August 25, 2020 letter from Mr. Khalatian on behalf of the developer. All parties, the City of Los Angeles decision makers, and the general public will significantly benefit from new subsurface geological field data. After the fault trenching is officially completed, the **Draft EIR needs to be recirculated** by the Los Angeles Planning Department to incorporate the new and highly pertinent geologic subsurface data.

   The new information from the California Geological Survey's comment letter and the United States Geological Survey's report show that a "substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance." (CEQA Guidelines Section 15088.5(a)(2).) They also show that feasible project alternatives or mitigation measures "considerably different from others previously analyzed [in the current Draft EIR – such as placing buildings off of and far enough away from any and all active fault lines –] would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it." (CEQA Guidelines Section 15088.5(a)(3).)

5. It is also suggested that the Los Angeles City Geologist **retain the U.S. Geological Survey geophysicists** to perform **additional guided-wave fault studies** in the Hollywood area, particularly on or at the West Site of the proposed project, but also more broadly. This new and reliable subsurface data will greatly assist with reliable zoning and planning by Los Angeles City Government.

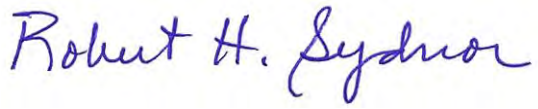
6. In prior years, the author of this letter, Robert Hadley Sydnor, served on the **Grading Appeals Board of the City of Los Angeles.** For example, when the Los Angeles City Geologist did *not* approve a site grading permit and building permit for a new structure, the appeal was heard by the **expert and neutral** Grading Appeals Board composed *only* of state-licensed professionals. This was quite effective for all parties involved because it **removed politics from the decision-making process.** I was then the elected chairman of the Southern California Section of the Association of Engineering Geologists; and was concurrently Orange County Geologist. I was a neutral expert in fault studies and engineering geology consulting work (high-rise buildings, hospitals, public schools, nuclear power plants, hydraulic dams, natural-gas transmission pipelines, and residential tracts.)

   It is recommended that the **Los Angeles City Geologist consider reconvening the Grading Appeals Board** for the City of Los Angeles; and use it to decide complicated projects. This would help **remove politics** from the decision-making process and **keep geological science in the forefront** *(as it should be).* I note that several members of the Los Angeles City Council have recently pleaded guilty to or have been arrested for corruption and extortion. Others have recently been criminally indicted regarding zoning and building permits.

   Alternatively, a committee of neutral, independent and highly qualified experts should be chosen in a transparent process that the public can repose confidence in, who would then establish the parameters for the additional trenching that has been recommended, and with which I concur. Those parameters should include the length, depth, location(s) and extent of the new trenching, as well as not only permit, but encourage independent scientists, including from the California Geological Survey and the United States Geological Survey, to be given unfettered access and cooperation. Science, facts, public safety, and public disclosure must be the paramount goals. It is this author's opinion that only new trenching as part of the Draft EIR process can provide that.

7. For the record, this letter was prepared *pro-bono* for seismic safety of the public; there was no compensation for it by any party. The author is neutral with significant professional geologic credentials *(as shown above and below).* The names of professional societies are for identification purposes only; no society endorsement is implied.

Respectfully submitted,



Robert Hadley Sydnor
California Professional Geologist #3267
California Certified Hydrogeologist #6
California Certified Engineering Geologist #968
AIPG Certified Professional Geologist #4496
Fellow, Geological Society of America
Life Member, California Academy of Sciences
Life Member, Seismological Society of America
Life Member, Association of Engineering Geologists
and former *elected Chairman* of Southern California Section of AEG
and former AEG National Board of Directors
Life Member, American Geophysical Union
Life Member, American Association for the Advancement of Science
(AAAS is the world's largest scientific body)
Senior Member, American Society of Civil Engineers
Senior Member, American Association of Petroleum Geologists
Senior Member, American Association of Professional Geologists
Member, Earthquake Engineering Research Institute
27-year Member *(retired),* Examination Committee of the California State
State Board of Registration for Engineers, Surveyors, and Geologists; and
Expert Witness in Court for the California State Attorney General
about geology licensure discipline and license revocation

Exhibit F

City of Los Angeles CEQA Thresholds Guide for Geologic Hazards

L.A. CEQA THRESHOLDS GUIDE

Your Resource for Preparing
CEQA Analyses in Los Angeles

City of Los Angeles
2006

E.1. GEOLOGIC HAZARDS

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Questions

VI.a.i): Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

VI.a.ii): Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

VI.a.iii): Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

VI.a.iv): Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

VI.c): Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

VIII.j): Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?

B. Introduction

Geologic processes that result in geologic hazards include: surface rupture, ground shaking, ground failure, tsunamis, seiches, landslides, mudflows, and subsidence of the land.[1] Because the region is generally considered to be geologically active, most projects will be exposed to some risk from geologic hazards, such as earthquakes. Thus, significant geologic impacts exceed the typical risk of hazard for the region.

[1] *Sediment and erosion are addressed in E.2. SEDIMENTATION AND EROSION.*

Surface ruptures are the displacement and cracking of the ground surface along a fault trace. Surface ruptures are visible instances of horizontal or vertical displacement, or a combination of the two, typically confined to a narrow zone along the fault. The effects of ground shaking, the actual trembling or jerking motion of the ground during an earthquake, can vary widely across an area and depend on such factors as earthquake intensity and fault mechanism, duration of shaking, soil conditions, type of building, and other factors. Ground failure results from the cyclical ground acceleration generated during an earthquake, producing landslides, ground cracking, subsidence and differential settlement. Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils.

Tsunamis are large ocean waves generated by large-scale, short-duration submarine earthquakes. Tsunami waves are capable of traveling great distances (over 1,000 miles) and damaging low-lying coastal regions. Seiches are waves formed from oscillations in enclosed or restricted bodies of water (i.e., harbors, lakes). Seiches can cause water to overtop reservoirs and lakes.

Mudflows and landslides are the downslope movement of soil and/or rock under the influence of gravity. Mudflow and landslide processes are influenced by factors such as thickness of soil or fill over bedrock, steepness and height of slope, physical properties of the fill, soil or bedrock materials and moisture content. These factors may increase the effective force of gravity upon a slope, decrease the ability of a slope to resist gravitational influence or a combination of the two, which can lead to mudflows and landslides.

Subsidence is a localized mass movement that involves the gradual downward settling or sinking of the Earth's surface, resulting from the extraction of mineral resources, subsurface oil, groundwater, or other subsurface liquids, such as natural gas. Settlement is the gradual downward movement of a structure due to compression of the soil below the foundation. The principal cause of subsidence is the extraction of subsurface liquids, whereas settlement results from the compression of soils due to the weight of the structure or by surcharging following the placement of fill.

Construction is regulated by the Los Angeles Building Code, Sections 91.000 through 91.7016 of the Los Angeles Municipal Code (LAMC). The Los Angeles Building Code provides requirements for construction, grading, excavations, use of fill, and foundation work including type of materials, design, procedures, etc., which are intended to limit the probability of occurrence and the severity of consequences from geological hazards. Necessary permits, plan checks, and inspections are also specified.

C. Screening Criteria

- Is the project located in an area susceptible to unusual geologic hazards considering the following:
  - Designation on official maps and databases;
  - Past episodes on-site or in the surrounding area; and
  - Physical properties of the site, including the topography, soil or underlying bedrock (including thickness of bedrock and soil compressibility, strength, moisture content, and distribution)?
- Would the project include any of the following:
  - Placement of structures designed for regular occupancy or infrastructure on fill; or
  - Active or planned extraction (removal) of mineral resources, groundwater, oil, or natural gas on-site or in the surrounding area?

A "yes" response to any of the preceding questions indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Threshold for Geologic Hazards, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to all of the preceding questions indicates that there would normally be no significant Geologic Hazard impact from the proposed project.

D. Evaluation of Screening Criteria

Review the description of the proposed project, project site, and surrounding area. To assist in determining whether the project is located in an area of known or suspected geologic hazard, consult the following maps and databases:

- Environmental and Public Facilities Maps, including:
  - Alquist-Priolo Special Study Zones and Fault Rupture Study Areas,
  - Inundation and Tsunami Hazard Areas,

- Areas Susceptible to Liquefaction,
- Landslide Inventory and Hillside Areas,
- Areas Containing Significant Mineral Deposits, and
- Oil Field and Oil Drilling Areas;

- ZIMAS (Zone Information & Map Access System): http://zimas.lacity.org

- Navigate LA: http://navigatela.lacity.org/

- Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM) for tsunami hazards

Using the above information, field research, published reports, or other appropriate maps or studies, as available, assess whether the project is located in an area susceptible to geologic hazards. Consider past episodes on site or in the surrounding area; steepness/height of slopes; physical properties of the soil; the presence of fill; or extraction of resources below the surface. If necessary, consult with the Bureau of Engineering or Department of Building and Safety.

Compare this information to the Screening Criteria.

2. DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

A project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury.

B. Methodology to Determine Significance

Environmental Setting

In a description of the environmental setting, include the following information:

- Description of the physical setting and geology, such as the topography, steepness and height of slopes or cliffs, physical properties of the soil and underlying bedrock, proximity to bodies of water, presence of fill, and extraction or mining activities;

- Identification of the geologic processes that may result in geologic hazards on the project site or in the surrounding area; and

- Summary of requirements and/or policies for geologic hazards that apply to the project site.

Project Impacts

Using the information from the Evaluation of Screening Criteria and the description of the proposed project, project site, and surrounding area, determine the geologic hazards that the project would cause or accelerate. Substantial damage to structures or infrastructure and exposure of people to substantial risk of injury is related to the probable frequency of potential geologic hazards (i.e., likely number of events per year or decade) and the probable severity of the consequences to people, property, or infrastructure that may result (i.e., injuries to people and the valuation of property damage). Consider that the geologically active nature of the region means that most projects will be exposed to geologic hazards, such as seismic activity. Significant impacts, as indicated by the significance threshold, exceed the typical risk of hazard for the region. Consider the type of uses that would be included in the project, the characteristics of the occupants of the project, and the change in risk of hazard or damage that would result from the project.

Cumulative Impacts

Review the description of the related projects. Identify those with elements, activities, or operations which would cause or accelerate geologic hazards that would extend off-site. Consider the impact from the combined effect of the related and proposed projects, in the same manner as described above for Project Impacts.

Sample Mitigation Measures

Potential mitigation measures include the following:

- Use interim precautionary steps during construction; and
- Use design and structural features that exceed the requirements of the Los Angeles Building Code and Planning and Zoning Code. (Chapter 1 of the Municipal Code).

3. DATA, RESOURCES, AND REFERENCES

Department of Building and Safety, 201 North Figueroa Street, 4th Floor, Construction Services Center, Los Angeles, California 90012; Telephone: (213) 833-8389.

Bureau of Engineering, Geotechnical Engineering Group, 650 S. Spring St., Suite 495, Los Angeles, CA 90014. (213) 847-4010.

Bureau of Engineering, Structural Engineering Group, 650 S. Spring St., Suite 400, Los Angeles, CA. 90014. (213) 847-8774.

City Planning Department, Environmental and Public Facilities Maps (1996):

- Alquist-Priolo Special Study Zones and Fault Rupture Areas illustrates the approximate locations of Alquist-Priolo Special Study Zones and fault rupture areas;
- Inundation and Tsunami Hazard Areas;
- Areas Susceptible to Liquefaction;
- Landslide Inventory and Hillside Areas illustrates the approximate locations of hillside areas, areas with known or probable bedrock landslides, and areas of surficial landslides larger than five acres;
- Areas Containing Significant Mineral Deposits identifies areas within a Mineral Resource Zone (MRZ) 2. Projects within this designation may experience subsidence/settlement where mineral extraction has occurred or is planned; and
- Oil Field and Oil Drilling Areas show areas known to have supported at least six months of oil production, indicating an increased risk for subsidence.
- ZIMAS (Zone Information & Map Access System) http://zimas.lacity.org
- Navigate LA http://navigatela.lacity.org/
- Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps.

Planning and Zoning code is available from the City Planning Department's Central Publications Unit at 200 N. Spring St., 5th Floor, Los Angeles, CA., 90012; Online at: http://amlegal.com/los_angeles_ca/.

Selected Legislation

Federal

Flood Insurance Rate Maps (FIRMs) (10 CFR Section 1022.11, 43 CFR Section 64.3)

FIRMs are prepared by the Federal Insurance Administration of the Department of Housing and Urban Development (HUD) after a risk study for a community has been completed and the risk premium rates have been established. The maps indicate the risk premium zones applicable in the community and when those rates are effective. They are used in making flood plain determinations and to determine if a proposed action is located in the base or critical action flood plain, as appropriate.

State

Alquist-Priolo Earthquake Fault Zoning Act (PRC Section 2621.5)

Provides policies and criteria to assist cities, counties, and state agencies in the development of structures for human occupancy across the trace of active faults. Intended to provide the citizens of the state with increased safety and to minimize the loss of life during and immediately following earthquakes by facilitating seismic retrofitting to strengthen buildings, including historical buildings, against ground shaking.

Received LATE

December 8, 2020

Los Angeles City Planning
Community Planning Bureau
200 N Spring Street,
Room 667
Los Angeles, CA 90012

RE: CPC-2016-1450-CPU (Hollywood Community Plan Update)

I STRENUOUSLY OPPOSE PORTIONS OF THE HOLLYWOOD COMMUNITY PLAN UPDATE, SPECIFICALLY CHANGING ZONING FROM R1-1 TO R3-1XL IN THE BEACHWOOD CANYON HOLLYWOODLAND AREA.

I have owned two adjacent lots in the Hollywoodland neighborhood (Durand Drive) since 1985. My dream has always been to build my retirement home in that neighborhood when the time came. My years as landowner have seen the Hollywoodland Specific Plan as well as the overall Hollywood Community Plan come into effect. I participated in the debate on both. And now a Hillside Construction Regulation Supplement Use District is proposed as well. I am not a developer looking to erect a mini-mansion in the hills. I just want to build a modest hillside home for myself in a historic area with some nice views of the city. Unfortunately, the new proposed regulations will make that much more difficult and likely prohibitively expensive. As one example, the proposed zone change from R1-1 to R3-1XL changes my maximum building height from 45 feet to 30. Unfortunately, this arbitrary height restriction hamstrings the ability to build a reasonable dwelling in the Hollywood Hills, no matter how modest the proposal. The new plan would also impact my property value in a negative way.

A cynical person would suggest the new plan is a scheme by homeowners who want a legal way to stop building in their neighborhood. But I hope that's not true.

All I would ask is that you consider with a little more sensitivity landowner's like myself. Landowners who have been good tenants of their property, who have paid taxes, who have year-after-year paid for brush clearance, who have allowed homeowners to park on their vacant land, etc.

I agree that the beauty and historic nature of Hollywood needs thoughtful regulation to guide its future development. The Hollywoodland area has had 100 years of unique individualism. People of a certain ilk willing to tackle the challenge of hillside building and the result is a charming, unique and eclectic community. This new Community Plan unfortunately slams the door on people with that same sensibility who want to continue that legacy. It's sort of unfair when you think about it.

Best,

Gary Davidson
310-395-2504
Jd.gary@gmail.com

GARY DAVIDSON
808 6TH St. #3
SANTA MONICA, CA 90403

LOS ANGELES CA 900
8 DEC 2020 PM 12 L

Hollywood

LOS ANGELES CITY PLANNING
COMMUNITY PLANNING BUREAU
200 N. SPRING STREET
ROOM 667
LOS ANGELES, CA 90012

90012-469867

Received LATE

December 7, 2020

Los Angeles City Planning
Community Planning Bureau
200 N Spring Street,
Room 667
Los Angeles, CA 90012

RE: CPC-2016-1450-CPU

This letter is in regard to the proposed Hollywood Community Plan Update.

I have owned two adjacent lots in the Hollywoodland neighborhood (Durand Drive) since 1985. My dream has always been to build my retirement home in that neighborhood when the time came. My years as landowner have seen the Hollywoodland Specific Plan as well as the overall Hollywood Community Plan come into effect. I participated in the debate on both. And now a Hillside Construction Regulation Supplement Use District is proposed as well. I am not a developer looking to erect a mini-mansion in the hills. I just want to build a modest hillside home for myself in a historic area with some nice views of the city. Unfortunately, the new proposed regulations will make that much more difficult and perhaps prohibitively expensive. As one example, the proposed zone change of my lots from R1-1 to R3-1XL changed my maximum height from 45 feet to 30. I can't understand how arbitrarily chopping off 15 feet 'maintains existing neighborhood scale' when most existing homes are 45 feet. The new proposal will impact my property value in a negative way if I am forced to sell, because of all the new restrictions. Limiting the floor area of a house seems a more sensible way to keep new construction in scale with existing. Unfortunately, an arbitrary height restriction hamstrings anyone trying to build in the hills, no matter how modest their proposal.

A cynical person would suggest the new plan is a sly scheme by homeowners who want a legal way to stop building in their neighborhood period. But I hope that's not true.

All I would like to ask is that you consider with a little more sensitivity landowner's like myself. Landowners who have been good tenants of their property, who have paid taxes, who have year-after-year paid for brush clearance, who have allowed homeowners to park on their vacant land, etc.

I agree that the beauty and historic nature of Hollywood needs thoughtful regulation to guide its future development. The Hollywoodland area has had 100 years of unique individualism. People of a certain ilk willing to tackle the challenge of hillside building and the result is a charming, unique and eclectic community. This new Community Plan unfortunately slams the door on people with that same sensibility who want to continue that legacy. It's sort of unfair when you think about it.

Best,

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