



Alejandro Huerta <alejandro.huerta@lacity.org>

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## Crossroads Hollywood, ENV-2015-2026-EIR

4 messages

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**Hollywood Heritage** <hollywood.heritage1980@gmail.com>  
To: alejandro.huerta@lacity.org

Mon, Nov 23, 2015 at 2:49 PM

Hi Mr. Huerta,

Attached are Hollywood Heritage's comments for the Crossroads Hollywood project.

Thanks,  
Christy McAvoy

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 **Hollywood Heritage Crossroads Hollywood NOP Comments.pdf**  
242K

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**Alejandro Huerta** <alejandro.huerta@lacity.org>  
To: Hollywood Heritage <hollywood.heritage1980@gmail.com>

Mon, Nov 23, 2015 at 2:53 PM

Dear Christy:

I have received the letter.

Sincerely,  
**Alejandro A. Huerta**  
Environmental Analysis•Major Projects  
213•978•1454



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**Alejandro Huerta** <alejandro.huerta@lacity.org>  
To: Stephanie Eyestone-Jones <s.eyestone@eyestoneeir.com>, Heidi Mekkelson <h.mekkelson@eyestoneeir.com>

Mon, Nov 23, 2015 at 2:53 PM

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 **Hollywood Heritage Crossroads Hollywood NOP Comments.pdf**  
242K

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**Heidi Mekkelson** <h.mekkelson@eyestoneeir.com>  
To: Alejandro Huerta <alejandro.huerta@lacity.org>, Stephanie Eyestone-Jones <s.eyestone@eyestoneeir.com>

Mon, Nov 30, 2015 at 7:47 AM

Received, thanks.

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**From:** Alejandro Huerta [mailto:[alejandro.huerta@lacity.org](mailto:alejandro.huerta@lacity.org)]  
**Sent:** Monday, November 23, 2015 2:54 PM  
**To:** Stephanie Eyestone-Jones; Heidi Mekkelson  
**Subject:** Fwd: Crossroads Hollywood, ENV-2015-2026-EIR

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**HOLLYWOOD HERITAGE, INC.**  
**P.O. Box 2586**  
**Hollywood, CA 90078**  
**(323) 874-4005 • FAX (323) 465-5993**

November 23<sup>rd</sup>, 2015

**Submitted electronically**

Alejandro Huerta  
Environmental Analysis Section  
Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012  
E-mail: [alejandro.huerta@lacity.org](mailto:alejandro.huerta@lacity.org)

RE: **Notice of Preparation: 'Crossroads Hollywood' Project**  
**ENV-2015-2026-EIR**

**Dear Mr. Huerta:**

The Board of Directors of Hollywood Heritage, its Preservation Issues Committee and its members, thank you for the opportunity to comment on the Notice of Preparation for the 'Crossroads Hollywood' Project, ENV-2015-2026-EIR at the initial stage of the CEQA process. Representatives of Hollywood Heritage have reviewed the Notice of Preparation, attended the scoping meeting, and heard a presentation from the project team at its November preservation committee meeting. Based on that information, we hereby provide the following comments.

**Project Description:**

"CRE-HAR Crossroads SPV, LLC, the Project Applicant, proposes to redevelop the Project Site with a cohesive, mixed-use development that blends the distinguishing character of Crossroads of the World with a collection of new buildings of modern design and creates an open-air pedestrian district with a mix of shopping, dining, and entertainment uses. The Project would retain, preserve, and rehabilitate Crossroads of the World and remove all other existing uses on the Project Site, including surface parking lots and approximately 86,947 square feet of existing floor area consisting of 84 residential units (including 80 multi-family dwelling units and two duplexes) and commercial/retail and office uses. The Project would integrate Crossroads of the World into a new, mixed-use development that would include eight new mixed-use buildings with residential, hotel, commercial/retail, office, entertainment, and restaurant uses. Upon build-out, the Project (including existing uses to be retained) would include

approximately 1,432,000 square feet of floor area consisting of 950 residential units, 308 hotel rooms, approximately 95,000 square feet of office uses, and approximately 185,000 square feet of commercial/retail uses. The proposed floor area ratio (FAR) would be approximately 4.69:1 averaged across the Project Site. Building heights would range from 3 to 32 floors with a maximum building height of approximately 402 feet above grade.”

**Issues of Concern:**

Please address the following issues in the relevant sections of the EIR.

- Hollywood Heritage requests both the Introduction, the Project Summary, and the Land Use section a clear and factual calculation of the requested settlements, in tabular form with totals, showing the various development parcels individually—for example the hotel parcel—and the actual allowable uses, heights, units, density etc., compared with what is being requested.
- If the applicant does not change their proposed project to include retention of all historic buildings, then Hollywood Heritage expects that 2 of the EIR alternatives will be as follows: #1A proposed project that does keep all the historic buildings, and #2 a proposed project that does keep the historic buildings and complies with current zoning.
- **Impact to Historic Resources.** The project could impact more than a dozen historic resources. Several of which are eligible for either the National Register or as Historic Cultural Monuments. Most of these have been identified continuously in surveys prepared by the Community Redevelopment Agency, the most recent of which was accomplished in 2009. Only one of these, Crossroads of the World, will be retained, albeit with impact to the site and the surrounding setting. We understand the project may be considering moving a Craftsman house within the site, and retaining the façade of the Hollywood Reporter. Even with the full retention of these three resources, the project contemplates more demolition of historic resources than any project proposed in the last decade. Hollywood Heritage is firmly committed to saving our historic resources, and does not believe there is justification for such demolition. This project needs to evolve to better incorporate these resources with new construction into the existing neighborhood. Reevaluating the demolition of historic structures and respecting the scale and current use and demographic of the area is key to a successful project.
- **Sunset Boulevard Commercial Streetscape.** Hollywood Heritage is concerned with the size, scale, and massing of historic commercial streetscapes. These linear streetscapes are an essential feature of Hollywood, preserving the identity of the neighborhood as much as that of individual buildings. This plan will reorient the street Las

Palmas and create a commercial and pedestrian paseo crossing Las Palmas and reaching up to Selma. The project offers a very clumsy approach to urban design—creating links amongst its own new buildings, which countermands the historic street pattern and past urban design efforts to create civilized connections between the higher scale buildings on Sunset and the pedestrian-friendly possible attractiveness of our historic Hollywood Boulevard.

A far better solution is to focus genuine urban design effort on the existing streets at the human scale—improving the streetscape and storefronts on side streets rather than rerouting streets and creating mid-block diagonals. There is extensive experience nationwide with this, and this project does not appear to have studied the ingredients which make large scale urban development successful.

Hollywood Heritage is opposed to funneling people on a diagonal toward a big hotel, a metro stop, and the current tourist trap, rather bringing neighbors and shoppers up to the Boulevard west of Highland. This development could economically broaden neighborhood-serving uses in historic buildings, and contribute to bringing residents back to our historic pedestrian friendly shopping street—the next normal step in evolution of a revitalizing urban area.

- **Impact on Hollywood Boulevard.** Hollywood Boulevard, a National Register listed district, is the tourist center of Hollywood in part because of the prime examples of historic scale, buildings, and streetscape. This project's drastic approach to high-density, large-scale buildings and introduction of a new commercial center could potentially harm Hollywood Boulevard. Pedestrians would be less likely to be drawn to the Boulevard, hurting the fragile businesses and resources currently there and would have an impact on the visual scale of the street. The planned large-scale buildings would significantly affect the scale of the entire area, including the Boulevard.
- **Compatibility of new design with surrounding historic properties.** The project must analyze its impact on adjacent historic neighborhoods, districts, and buildings. Of paramount concern is the composition of surrounding streetscapes. In addition, please address the question of how much square footage is in the historic buildings on the 7.5 acre site.
- **Effects of noise, additional traffic, and aesthetics on surrounding blocks.** There are severe impacts from noise, and additional traffic and to aesthetics on the blocks between Highland, Sunset, Las Palmas, and Selma. The impact to surrounding schools and businesses (some of them sensitive receptors) must be fully addressed.
- **Consideration of CRA and Hollywood Heritage Settlement.** Hollywood Heritage has unfortunately had to sue in the past to force

the City and CRA to live up to planning obligations for transportation plans and urban design plans—plans that were mandated to be in effect by today, and to lower density and/or govern detailed urban design PRIOR TO granting of any development intensity over the current zoning. Both the Community Plan and the Redevelopment Plan were clear that extra density requested by developers was principally to be offset by preservation of historic Hollywood. Crossroads is an opportunity to "do it right"—both to preserve all listed buildings on site, and to purchase development rights from other historic properties threatened today.

We encourage the EIR to clearly quantify requests for increases in development rights; to clearly state necessary findings and analyze those; and to clearly show the strictures of the Redevelopment Plan, the Transportation Plan (as yet conducted or adopted) and Urban Design Plans (as yet unadopted). We specifically request that the drafters of the EIR leave out the vague and self-serving verbiage about how projects comply with current plans, and only include factual evidence—real analysis, real numbers, real mitigation measures, real project design features, real community benefits, etc., with copies of genuine supporting information.

**About Hollywood Heritage, Inc.:**

For thirty-five 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 public policy discussions through the formulation of the Community Redevelopment Plan of 1986 and subsequent urban design plans, specific plans and in the property entitlement discussion involving historic resources. In addition, we support historic neighborhoods in their efforts to retain the character of their residential neighborhoods and adjacent commercial development. These efforts have resulted in the rehabilitation of significant landmarks and districts in Hollywood.

Hollywood Heritage appreciates the efforts of the project's developers and will work diligently with them to ensure the preservation and protection of all of Hollywood's historic resources. Please feel free to contact us at (323) 874-4005 should you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Bryan Cooper". The signature is written in a cursive, flowing style.

Bryan Cooper  
President, Hollywood Heritage, Inc.