

UNITEHERE! Local 11

464 Lucas Ave., Suite 201 • Los Angeles, California 90017 • (213) 481-8530 • FAX (213) 481-0352

To
Alejandro Huerta
City Planner
CC: Director of Planning
CC: City Planning Commission

RE: CPC-2015-2025-DB-MCUP-CU-SPR; ENV-2015-2026-EIR; CPC-2016-4927-DA; VTT-73568 [*Crossroads Hollywood Project*]

Dear Mr. Huerta,

This project faces significant problems and errors with its environmental analysis and land-use disposition. These factors are great enough to require at minimum additional time, resource, and study into the appropriateness of this project and its accuracy under CEQA. Moreover, if these problems cannot be cured the city decisionmakers should deny all discretionary approvals in full and deny any recommendation or motion to approve the Subdivision map, or the Final Environmental Impact Report (FEIR) for the *Crossroads Hollywood* project.

Affordable Housing

Due to the pending demolition of 82 Rent Stabilized units the FEIR at FEIR-II, p.23 discusses the fact that the law allows for either the replacement of the RSO units with the proposed 105 Covenanted Affordable units, or the application of the Rent Stabilization Ordinance to all new dwelling units. In acknowledging that the city's Rent Stabilization Ordinance could be applied to cover all 950 units in this project the FIER cites LAMC 151.28B and incorrectly concludes 105 Affordable units are sufficient. discusses exemptions for newly constructed units that are covenanted as affordable housing that are put on the market within the 5-year Ellis Act preemption. This section calls for one-for-one replacement or 20% "whichever is greater."

Applicant is proposing 950 units, 105 of which would be Covenanted Affordable, or replacement of the 82 plus an additional 23 units. As stated in the FEIR, this is approximately 11% of the units. The city's calculations and assessment of the interplay of Measure JJJ, the Ellis Act, and LAMC 151.21-28 are in error. Simple math concludes replacement units should be as many as 190 units. On and Off-Menu Density Bonuses aside, it flies in the face of good public policy to allow so large a development to be so out of character with the surrounding neighborhood.

Allowing nearly 1000 apartments to be built, destroying 82 existing RSO units in the process, but not mandating more Affordable and RSO housing be incorporated into the project is against public policy, and against the clear intent and will of the voters of Los Angeles. The

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voters of Los Angeles certainly did not envision a scenario in which their votes for more affordable housing would be used as back door way to approve hundreds upon hundreds of expensive market-rate and luxury housing few can reasonably afford. With the intensity of the land use here and the conflicts with the general plan, the city can and should entice Applicant to agree to the application of the Rent Stabilization Ordinance to the entirety of the project.

With so many allowances and considerations from the city and the people in order to construct this project, it would meet the policy goals outlined in the General Plan, the Hollywood Community Plan, and the Mayor's recent strong stance on a need for drastically more affordable housing across Los Angeles, and especially in the city's most dense neighborhoods.

Alcohol Permits

Los Angeles County already holds a vast number of liquor licenses, at approximately 18,000. The City of Los Angeles has one of the highest concentrations within the state, and Hollywood is chief among neighborhoods with an oversaturation of on-site sales of alcohol. Despite the area's obvious pull as an entertainment and tourism site and the value that brings to the city, overconcentration and subsequent health and safety, and quality of life issues that arise from such a deep concentration in a small area should give pause.

Here Applicant is seeking a Master Conditional use to permit twenty-two different establishments that will dispense alcohol, including the hotel. A further MCUP is sought for eight uses with public dancing and live entertainment. Even for a Regional Commercial zone or Entertainment District, this is a staggering concentration and number of permits for a single development.

The FEIR Appendix 4, Supplement to the Traffic Analysis at p.26 for this project analyzes 70,000 square feet of restaurant uses, half High-Turnover, half Quality Restaurants. However, the Modified Project put forward in FEIR Table III-1 table of proposed land uses identifies 140,000 square feet of potential restaurant uses and an additional 24,000 currently unstudied separate Entertainment Venue use, and 26,000 square-foot movie theatre use. The concentration of up to 22 Full Line alcohol permits in a single development, with up to 190,000 square feet dedicated to alcohol sales, as well as the associated lobby bar, rooftop bar, and use of alcohol within the 28,500 square-foot ground floor portion of the hotel, requires a more detailed and thorough analysis.

Nearly 200,000 square feet of new, alcohol-charged, noise-blaring, live entertainment uses in one development does not square with the General Plan Framework, nor with Hollywood Redevelopment Plan goals such as Goal 10 which promotes "sound residential neighborhoods."

Analysis must include and cumulatively study the effects of the dozens of new alcohol-charged venues permitted recently in Hollywood and engage in more rigorous consideration of the Applicant's stated intent to create a "destination" or "district" akin to Manhattan's Meat Packing District that will attract and concentrate patrons seeking alcohol in a way well above what the city has studied.

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Traffic

The supplemental traffic analysis at FEIR Appendix 4 misidentifies or mischaracterizes several of the proposed uses for the modified project. The analysis undercounts trip generation from the hotel, entertainment, and restaurant uses, effectively masking the additional significant impacts that may result from the flawed calculations.

A Letter from California Department of Transportation dated November 2015 all but begs the City of Los Angeles to work with CalTrans to conduct a comprehensive study and plan for the massive influx of development. The FEIR does not reflect or incorporate further communication with CalTrans, nor the results of any collaboration or study, if any, between the lead agencies and other advisory agencies (LADOT, CalTrans) regarding this issue. It is clear from the record available that such study would not only be wise but is here a required element for appropriate CEQA analysis of this project's known and potential significant impacts on traffic and existing facilities.

The project estimates to generate just under 14,500 new trips per day. There are known significant impacts in at least 22 studied intersections, and 5 remain above the threshold of significance and at LOS F even with the modified project and all credits applied, and the proposed TDM program applied.

Credits applied for internal capture and pass-by trips are also misapplied. Approximately 2,439 trips are subtracted from the estimated trip generation based on Pass-By credits. While perfectly applicable in many circumstances, here the credits are plainly over-applied and over-valued. These credits are all associated with uses in restaurants and shopping center portions of the project.

However, a "Quality" restaurant is associated with fine dining establishments generally considered non-chains, serving only dinner, requiring reservations, and where patrons sit for more than one hour. The FEIR makes no mention of Project features that prevent Applicant from leasing all 140,000 square feet of restaurant area to a High-Turnover chain restaurants, thereby generating nearly 50 percent more traffic trips and negating the premise behind the substantial trip reductions claimed in the FEIR.

As with Applicant's sought alcohol permits, the sheer concentration of these uses amid multiple skyscraper-sized housing, bar, nightclub, and hotel complexes will dissuade any reasonable person who wants to run a quick errand on their way to somewhere else in Hollywood. Rather, the concentration of use in the 1.4 million square foot project is likely to generate more direct car trips to and from the area and project, rather than accomplish the reduction the pass-by credits allege. A more thorough supplement to the Traffic Analysis is required.

Subdivision Map

A new subdivision map and the granting of over two dozen airspace lots is inappropriate at this time and for this project. The Modified Project no longer contains condominium uses. Granting a new Vesting Tentative Tract map or subdivision map is inconsistent and conflicting

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with ongoing plans for required historic preservation of the Crossroads of the World Site, the Hollywood Reporter building, and the retention of them onsite as-is.

Land Use

Additionally, the Project is inconsistent with land use plans governing this part of Hollywood, which is becoming increasingly saturated with similar alcohol-charged party hotels; this project would be the first among them if it is approved as proposed.

The CEQA, land use, and other concerns addressed in this letter must be adequately addressed to make the required City Code findings. The entitlements are discretionary, not by right. If the numerous errors and deficiencies discussed herein are not cured, City decisionmakers should reject requested discretionary entitlements because the findings cannot be made. Among the specific findings required include:

- The Project conforms with the public necessity, convenience, general welfare and good zoning practice (*see e.g.*, GPA under LAMC § 12.32.C; VTT under 17.15.C.2; ZC under § 12.32.C.3; CUPs under § 12.24.E.2);
- will enhance the built environment in the surrounding neighborhood or perform a function/service that is essential or beneficial to the community, city, or region (*see e.g.*, CUPs under 12.24.E.1);
- compatible with and will not adversely affect or further degrade adjacent properties (*see e.g.*, CUPs under 12.24.E.2; SPR under § 16.05.F.2);
- substantially conforms to the purpose, intent, and provisions of the General Plan and applicable community or specific plans (*see e.g.*, CUP under LAMC § 12.24.E.3; SPR under § 16.05.F.1).

These findings cannot be adequately or reasonably made. As just one example the FEIR (incorporated) IV-H Land Use section claims project is consistent with Policy 3.2.4 regarding the height, density, and character of a neighborhood when assessing a new development. It would strain even the most credulous reader to see the renderings of this proposed project and not immediately notice how dramatically bigger and out-of-scale it is compared to surrounding uses.

Conclusion

The EIR for this project leaves many potentially significant impacts unaddressed on traffic impacts from the project (cumulative and project specific); Air Quality, Greenhouse Gas Emissions, alcohol oversaturation, misidentified land use, and questionable housing policies and goals implantation, as well as other cumulative project impacts. The project is too big, too flawed, and demands far too much from the citizens of Los Angeles and the residents of Hollywood. We urge the Deputy Advisory Agency and the City Planning Commission to reject this project in its entirety.