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Comments on Crossroads Hollywood DEIR, ENV-2015-2026-EIR

1 message

Casey Maddren <cmaddren@gmail.com>
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Tue, Jul 25, 2017 at 10:54 PM

July 25, 2017

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Major Projects
Department of City Planning
200 N. Spring St., Rook 750
Los Angeles, CA 90012

Re: Crossroads Hollywood DEIR, ENV-2015-2026-EIR

Dear Mr. Huerta,

I'd like to submit the following comments on the Crossroads Hollywood DEIR, ENV-2015-2026-EIR.

Thanks,
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CROSSROADS DEIR

COMMENTS

SECTION II
PROJECT DESCRIPTION

The first part of Section II, Introduction, outlines the number of buildings, proposed uses, number of units, FAR, etc., but makes no mention of the inclusion of 22 alcohol related uses within the proposed development, as well as 8 uses offering live entertainment. Information on these uses is only contained under the heading Necessary Approvals at the end of Section II.

The organization of the information is deceptive, and buries information crucial to understanding the project at the very end.

SECTION IV, C
GREENHOUSE GAS EMISSIONS

The DEIR emphasizes that the project has received LEED Silver certification. This is a popular tactic to sell a building to politicians and the public, but LEED certification in fact means very little.

LEED is not based on actual energy performance, but instead on points gained from marking a checklist during the design phase. The US Green Building Council (USGBC) has failed to provide the kind of comprehensive data that would allow a scientific analysis of the actual benefits. The data that the USGBC has provided is from a small sampling that seems to be cherry-picked. Please see the following article.

APS News, American Physical Society, July 2013, page 8
No Evidence LEED Building Certification is saving Primary Energy
<https://www.aps.org/publications/apsnews/201307/backpage.cfm>

Here's an excerpt:

"Six of our nation's largest cities have passed ordinances requiring all commercial buildings to annually submit their energy consumption data into the ES system for subsequent municipal use. New York City is the first such city, and last fall it made public 2011 energy consumption data for some 4,000 buildings of 50,000 sf or larger—and this list included nearly 1,000 office buildings of which 21 were identified as LEED certified. **These data clearly show there to be no statistically significant difference between the source energy consumed by or GHG emitted by LEED certified buildings as compared with other large NYC office buildings.** It should be noted that LEED office buildings certified at the Gold level and higher did outperform other office buildings."

Please see also the following article by Anastasia Swearingen, Senior Research Analyst at Berman and Company.

LEED-Certified Buildings Are Often Less Energy-Efficient Than Uncertified Ones
<https://www.forbes.com/sites/realspin/2014/04/30/leed-certified-buildings-are-often-less-energy-efficient-than-uncertified-ones/#66c1b8fa2554>

page IV.C-26

The DEIR argues that the 2012 adoption of Regional Transportation Plan/Sustainable Communities Strategy RTP/SCS emphasizes achieving GHG reduction targets by integrating transportation network into planning.

But, in fact, MTA system-wide ridership totals have demonstrated no gains in ridership due to the City Hall's poorly considered attempts at transit-oriented development. In fact, ridership totals are lower than they were in 1985. They have fallen for the past three years straight. The assumption that this project will produce any reductions in traffic generation is mistaken, since City Planning has never made a sincere attempt to implement transit-oriented development.

page IV.C-41

The DEIR states that because CARB, SCAQMD and City of LA have failed to establish thresholds regarding greenhouse gasses, the project can not be found to have a significant impact in this area.

This is one of the most maddening failures of state and local government. With all the rhetoric about fighting climate change and going green, state and local agencies have not yet adopted standards that are crucial to actually achieving greenhouse gas reductions.

Because of their inaction, this excessive and exploitative project will probably move forward, with no serious assessment of its impacts on greenhouse gas emissions, which will be considerable. Talk is cheap. Our elected officials have failed us miserably in this respect.

SECTION IV, K.1 PUBLIC SERVICES - POLICE PROTECTION

page IV.K.1-3

For some strange reason, the DEIR cites reductions in violent crime resulting from COMPSTAT implementation in 2002-2004. Why is the DEIR citing data that's more than 10 years old?

pages IV.K.1-5, 7, 12

The DEIR acknowledges that Hollywood Division ratio of officers to 1,000 residents ratio is 2.13, lower than citywide ratio of 2.61 officers to 1,000. The DEIR also shows that Hollywood Division officers average 15 crimes per officer as opposed to Citywide average of 12 crimes per officer, and that the increase in population resulting from the project would mean a decrease in the ratio of officers to 1,000 residents to 2.09.

The DEIR claims that crime impacts would be reduced by "design-out crime" features, and that after mitigation, "Project-level and cumulative impacts with regard to police protection would be less than significant."

The DEIR's conclusions are absurd and irresponsible. Let's look at the facts....

Crime in the Hollywood area has been increasing for years. We have seen significant increases in both violent crime and property crimes, as evidenced by the most recent COMPSTAT Hollywood Area data shown below.

COMPSTAT
Hollywood Area Profile
6/18/17 thru 7/15/17

VIOLENT CRIME

YTD 2017 - YTD 2015 - % Change

Homicide	2	5	-60%
Rape (121,122)	46	45	+2.2%
Rape (815,820,821)	35	29	+20.7%
Total Rape	81	74	+9.5%
Robbery	256	199	+26.6%
Aggravated Assault	325	294	+10.5%
Total Violent	664	572	+16.1%

PROPERTY CRIME

Burglary	233	248	-6.0%
Motor Vehicle Theft	320	282	+13.5%
BTFV	994	726	+36.9%
Personal/Other Theft	885	896	-1.2%

On October 6, 2014 Chief Charlie Beck wrote to Chief Zoning Administrator Linn Wyatt regarding the “oversaturation” of ABC locations in Hollywood and the resulting crime impacts. He asked the DCP to exercise greater control over alcohol permits. Since then the DCP has issued a number of new permits, and crime has increased significantly.

Years of research has shown a strong relationship between alcohol use and crime. Below are links to two studies which document this relationship.

Alcohol and Violent Crime, US Department of Justice, 2006
http://www.nllea.org/documents/alcohol_and_crime.pdf

Alcohol Outlets as Attractors of Violence and Disorder, Urban Institute, 2008
http://www.urban.org/research/publication/alcohol-outlets-attractors-violence-and-disorder/view/full_report

The developer requests a Master Conditional Use Permit for the sale of alcoholic beverages in connection with a total of 22 alcohol-related uses associated with the Project’s proposed hotel and commercial uses and 8 uses with live entertainment.

There are currently 67 establishments serving alcohol in Central Hollywood (bounded by Franklin, Gower, Sunset and La Brea). **Approval of the Master Conditional Use Permit would mean an increase of almost one third in the number of establishments serving alcohol in Central Hollywood.**

The DEIR fails to acknowledge the likely increase in crime which would follow such a steep increase in alcohol uses in an area that is already suffering from high crime rates. The DEIR also fails to acknowledge the additional burden resulting from the influx of visitors due to the addition of 8 live entertainment venues.

There is little doubt that the project would result in significant increases in crime, including violent crime. The Hollywood Division is already struggling to deal with existing crime in Hollywood.

The DEIR's claim that mitigations such as "design-out crime" features would render the project's impacts less than significant is ridiculous.

The DEIR's conclusions regarding impacts to police protection would be laughable if the consequences weren't so serious. **The project will be built directly across the street from Hollywood High School and in close proximity to Selma Avenue Elementary and Larchmont Charter School. No doubt many will argue that students are in school during the day, and the clubs and bars will draw the most activity at night. This argument fails to recognize that these children/youth live in the area 24/7. They will certainly be impacted by this major expansion of the Hollywood nightlife scene, which in addition to alcohol will no doubt bring with it increased drug use and violent crime.**

SECTION IV, L TRAFFIC, ACCESS AND PARKING

While the traffic study correctly identifies intersections where congestion is significant, it fails to consider a number of important aspects of the Hollywood area and also fails to examine the impacts of a project that, with 22 alcohol-related uses and 8 live entertainment venues, is certainly designed to draw crowds at nights and on weekends.

The traffic study was conducted in May 2015, and only examines LOS during weekday AM and PM rush hours. This is strange, since Hollywood is home to a number of entertainment venues and a thriving club scene that attracts large crowds at night and on weekends.

Having conducted the study in May, the consultant examines traffic loads before the beginning of the Hollywood Bowl season. Generally speaking there are only a handful of lease events in May, and they're usually scheduled on weekends.

The traffic study fails to consider the impacts of approximately 100 Hollywood Bowl events during each season. This means that the study does not address conditions that exist on Hollywood's streets about 25% of the year.

The traffic study, amazingly, also makes no mention of frequent full or partial street closures for a variety of events including movie premieres, streets concerts, Taste of LA, the LA Marathon, the Latin American Music Awards, and the Academy Awards.

The traffic study also makes no mention of additional traffic resulting from visitors attending shows at the project's 8 entertainment venues. While most of this traffic will no doubt occur at nights and on weekends, there are times when the Hollywood area already experiences severe congestion during these periods. Additional loads resulting from these new venues will only make the situation worse, and require more money spent on traffic management personnel.

page IV.L-62

Due to the project's proximity to Hollywood/Highland Red Line Station, a 15% reduction was applied to traffic totals, as allowed by LADOT.

In fact, in LA there has been no demonstrated benefit from construction of high-density projects near transit hubs. The City has been pursuing a policy of encouraging so-called transit-oriented development for about 20 years now, and yet transit ridership is lower than it was in 1985. This is in spite of the fact that the County of LA (the area served by the MTA) has seen an increase of over 1,000,000 residents during the same period. Transit ridership on both MTA and LADOT lines has fallen steadily for the past 3 years.

LADOT's allowance of a 15% reduction in traffic totals because of proximity to transit hubs is not based on actual data, but on wishful thinking. In LA the facts show that high-density projects have provided no actual reductions in trip generation. **Traffic impacts should be evaluated without the benefit of this reduction.**