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DEIR response "Crossroads Development" - ENV-2015-2026-EIR - LATU Hollywood Local

1 message

Hunter Photography <heysuzhunter@gmail.com>
To: Alejandro Huerta <alejandro.huerta@lacity.org>

Tue, Jul 25, 2017 at 11:07 PM

Mr. Huerta,
Please see the attached documents for the public comment file.
Thank you for your time,
Susan Hunter
Livable LA
Los Angeles Tenants Union - Hollywood Local

2 attachments

 **Crossroads DEIR cover letter.pdf**
60K

 **Crossroads DEIR response.pdf**
423K

To:

Alejandro Huerta
Environmental Review Coordinator
Major Projects & Environmental Analysis
Department of City Planning
City Hall, City of Los Angeles
200 North Spring Street, Room 750
Los Angeles, CA 90012
alejandro.huerta@lacity.org

From:

Susan Hunter
Los Angeles Tenants Union - Hollywood Local
Livable LA
6500 Sunset Blvd.
Los Angeles, CA 90028

RE: "Crossroads Hollywood"/ **ENV-2015-2026-EIR**/ State Clearinghouse No. 2015101073

Mr. Huerta,

Please see the attached pages as a response to the DEIR. As a long time resident, I am appalled at the increase in development projects that are radically out of scope with the community. The community doesn't want a 400 foot liability looming over us everyday wondering when it will collapse after large seismic activity. There is no possible way that this project can be of such a financial benefit for EVERYONE in the community, that it would outweigh the death it will cause when people are trapped in it and it collapses. This project speaks to the larger corrosion that is happening across the city. Have we truly allowed ourselves to degrade as a city to one that prioritizes money and policy over human life? We place the importance of knowing the nuances of each policy just to feel like a king of the hill; and all this has done is to take our city to the point that we completely ignore the damages that policy does just because of trying to create more policy to undermine the laws that doesn't allow developers to break them? And what has this created but a language that has become so complicated it excludes the very public it was intended to serve? That one can no longer have a meaningful conversation with city hall unless it's in the language you prefer, which requires a degree to speak it. Yet this city will accept a project that can't mitigate the loss of human life that project will cause if it is financially worth it. One can not espouse higher learning when that same individual no longer recognizes the importance of not costing human life. Why then do we choose to allow this to happen? To show how smart we are; when really it's not smart at all? We can't say we have to uphold the worthiness of policy when we choose to allow that policy to make us impotent to preventing human suffering. We can't reward bad developers and entrust them with more lives they have no concern over protecting, just because of words on a piece of paper whose intent has become so bastardized it no longer represents what it was originally

meant to accomplish. How can we call ourselves a progressive city when we choose to operate at the lowest common denominator of greed and financial influence?

It has become painfully clear that the conversations the public has with each other on the streets in regards to city hall is "what's the point". We all know that a decision has already been made in regards to this project long before anyone saw a shiny illustration. So the only thing I will really comment on, is the fact that these kinds of law bending developments is the exact reason why the people out there no longer have faith in the people in the building where this document now sits. The fact is a developer gets to break all the laws that they want, and the people in here will do nothing to stop it. It is the people in here who have created the environment that is the reason why the people in this city no longer trust the government. This developer is a bad developer who will result in the injury of people and ultimately the loss of life when a large earthquake happens, and we are educated enough to know it will. We have so much data and scientific material to help us make the right decisions to save human lives, and we will throw it all away for a shiny investment.

So instead of looking for ways to make what we say not matter, maybe it's about time the people in here made our comments and input mean something again. I constantly hear the complaints that the public isn't involved enough. Why would they be when we can't be involved unless we can speak the complicated language necessary to convey what we mean? When does city hall start using our language again and wanting to have a real dialogue with us, besides to tell us that you know what's best for our community? Perhaps it's time to stop bullying projects like these thru our community and start planning around what we really want. And what no one wants is to wonder why we built this nightmare in the first place after it has collapsed.

Sincerely,
Susan Hunter
Los Angeles Tenants Union
Livable LA

Livable Los Angeles (hereby referred to as LLA) and the Los Angeles Tenants Union - Hollywood Local do oppose the entirety of the “Crossroads development project” and its DEIR.

Reasons for objecting to the “Crossroads Project” in its entirety
ENV-2015-2026-EIR

1. This project violates the City’s zoning code;
2. This project violates the Mello Act (Government Code section 65590);
3. This project violates the RSO Ordinance #184873;
4. This project violates the Hollywood Community Plan;
5. This project violates the Hollywood Redevelopment Plan;
6. This project violates the General Plan of the City of Los Angeles;
7. The findings in the DEIR are not such to be able to mitigate impacts of the project below an acceptable level of significance;
8. The findings in support of the approval of the project are not supported by substantial evidence in the record;
9. The DEIR is incomplete in its analysis and findings;
10. The DEIR uses incorrect and incomplete data in its analysis and findings;
11. The DEIR uses conflicting and incomplete data in its analysis to come to conclusions that benefit the developer and do not stay neutral in its findings;
12. The DEIR does not take into account the financial disparity between the minimum wage income and the luxury usages of the site, intended to create walkability in the area.
13. The DEIR fails to acknowledge the economic discrimination this project will bring into the environment.
14. The DEIR fails to fully document the impacts of development on the site. Data is not supplied as to the full impact of building materials for the project. For a complete picture LCA Cradle to grave analysis is crucial and the DEIR is inadequate without this methodology. Building materials have an environmental impact at every step of the building process—extraction of raw materials, processing, manufacturing, transportation, construction and disposal at the end of a building’s useful life. Data documenting, describing, quantifying and analysing all building materials and environmental impacts of those materials at every phase of their life cycle, from extraction to disposal must be supplied for the environmental impacts of the project to be fully and accurately accounted for. Please supply.
15. The DEIR fails to fully document the impacts of demolition of existing structures and other materials currently on the site. Said materials and activity must be documented, described, quantified and analysed as part of the environmental impacts of the project.
16. The DEIR fails to fully document the impacts of development of the project of GHGs. The GHG impacts due and related to all activity related to the development, demolition, construction and disposal must be documented, described, quantified and analysed as part of the environmental impacts of the project.

The DEIR findings

Aesthetics, Views, Light/Glare, and Shading

- Under page I-45 of the I. Executive Summary Section (A) Aesthetics, Views, Light/Glare, and Shading (1) Aesthetics and Visual Quality (a) Analysis of Project Impacts (a) Construction the DEIR states “Project construction activities would not substantially alter or degrade the existing visual character and quality of the Project Site and its surroundings or introduce elements that generate substantial long term contrast with or substantially detract from the visual character of the surrounding area”. The DEIR fails to take into account the overall size and impact of the project that it will have on the community. It also fails to take into account the use of construction cranes and the impact they have on the visual quality of the neighborhood. Please provide fact based data and analysis on these issues.
- Under page I-46 of the I. Executive Summary, Section (A) Aesthetics and Visual Quality (a) Analysis of Project Impacts (2) Views, DEIR states “Scenic resources within the project area that are available from public locations include the Hollywood Hills and the Hollywood Sign. Views of these resources are limited, partial, distant, and/or non-existent”. DEIR erroneously describes the current Views. Currently ALL views of the Hollywood Sign and Hollywood Hills are distant, but many areas within the project area are full.
- Under page I-47 of the I. Executive Summary (A) Aesthetics and Visual Quality (a) Analysis of Project Impacts (2) Views the DEIR states “Under existing conditions, short range views of the project site are already obstructed from most public vantages and are generally only available to viewers at adjacent locations (i.e. pedestrians and motorists) along Sunset Boulevard and Highland Avenue and from the immediate uses surrounding the project site to the north and west”. The DEIR is grossly erroneous in describing the obstructed views of the project site as well as the view shed above the project site. The project site is visible from Sunset looking north along McCadden as well as north from Sunset along Las Palmas. The DEIR fails to cite what is supposedly currently blocking the view of the project site.
- Under page I-48 of the I. Executive Summary (A) Aesthetics and Visual Quality (a) Analysis of Project Impacts (2) Views, first paragraph “The potential for blocked views of the Hollywood Hills would diminish as the viewer moves away from the project site, just north and west of the project site”. The DEIR fails to state how far away an individual would have to be away from the site in order to gain back the view shed.
- Under page I-48 of the I. Executive Summary (A) Aesthetics and Visual Quality (a) Analysis of Project Impacts (2) Views, first paragraph “Accordingly, while the project would obstruct some partial, limited, and distant views of the Hollywood Hills, impacts would occur on an intermittent basis at single, fixed vantage points, rather than resulting in substantial blockages across long distances, such as along the length of a public roadway”. The DEIR erroneously and intentionally describes the volume of size of the site project and the impact it will have on the view shed as the entire project will have substantial blockages across long distances as the project is designed to become taller and more obstructive as one is moving west bound along Sunset. The viewshed of the commercial structures to the south of the project will be completely blocked.
- Under page I-48 of the I. Executive Summary (A) Aesthetics and Visual Quality (a) Analysis of Project Impacts (2) Views, fourth paragraph “The project would merely block

public views of other buildings to the west of the Project Site". DEIR fails to fully describe "merely" in blocking the viewshed to the east of the project site.

- Under page I-49 of the I. Executive Summary (A) Aesthetics and Visual Quality (a) Analysis of Project Impacts (3) Light and Glare (a) Construction "Construction activities would occur in accordance with the provisions of LAMC section 41.40, which limits the hours of construction to between 7:00 A.M. and 9:00 P.M. on weekdays and between 8:00 A.M. and 6:00 P.M. on Saturdays and national holidays" and "Outdoor lighting sources, such as floodlights, spotlights" and "typically accompany nighttime construction activities". DEIR fails to analyze how these night time light use activities will impact the residents or wildlife in the area at night time for the estimated 48 months of construction.
- Under page I-53 of the I. Executive Summary (A) Aesthetics and Visual Quality (b) Cumulative Impacts (1) Aesthetics/Visual Quality "Near the project site are related project No. 47, the Millennium Hollywood Mixed-Use Project" and "Related project No. 67, the Palladium Residences" and "Related Project No. 90, 7107 Hollywood Boulevard" and "Related Project 145, the Sunset and Gordon Mixed-Use project". DEIR fails to acknowledge the litigation that has impacted these projects, many of which have not been approved to move forward. DEIR also fails to acknowledge that development project will also most likely not make it out of litigation.
- Under page I-56 of the I. Executive Summary (A) Aesthetics and Visual Quality (c) Project Design Features, Project Design Feature A-3: "However, construction lighting shall not be so limited as to compromise the safety of construction workers". DEIR fails to look at other options such as not permitting work at night which would better ensure the safety of the construction workers.
- Under page I-56 of the I. Executive Summary (A) Aesthetics and Visual Quality (c) Project Design Features, Project Design Feature A-9: "All project illuminated signs will not exceed 600 candelas per square meter". DEIR fails to cite if any of the illuminated signs are planned to be "digital billboards" which are not in compliance with the current community plans.

Air Quality

- Under page I-41 of the I. Executive Summary, Summary of Impacts Under the Project (B) Construction and Operation of the site will lead to "Significant and Unavoidable" impact. Therefore only Alternative 1 will mitigate this negative impact.
- Under page I-57 of the I. Executive Summary (B) Air Quality (a) analysis of project impacts (1) construction (a) regional construction impacts "Construction of the project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the project site. In addition, fugitive dust emissions would result from demolition and construction activities". Also stated "However. Maximum regional construction emissions would exceed the SCAQMD daily significance thresholds for NOx during periods of heavy construction use and export of soil. Therefore, regional construction emissions resulting from the project would result in a significant short-term impact". DEIR fails to state the impact this will have on the exposure of the residents and children at the four neighboring schools less than 500' from the project site and the daily exposure to these particles for the estimated 48 mos. of construction.

- Under page I-58 of the I. Executive Summary (B) Air Quality (a) analysis of project impacts (1) construction (c) Toxic Air Contaminates “The greatest potential for TAC emissions during construction would be from diesel particulate emissions associated with heavy equipment operations during grading and require the most heavy-duty diesel vehicle usage, such as site grading/excavation, would last for a much shorter duration”. DEIR fails to state the impact this will have on the exposure of the residents and children at the four neighboring schools less than 500’ from the project site and the daily exposure to these particles. DEIR also fails to state the estimated time for this phase of the construction.
- Under page I-58 of the I. Executive Summary (B) Air Quality (a) analysis of project impacts (2) Operation (a) Regional Operational Impacts “Regional emissions resulting from operation of the project at its buildout year of 2022 are expected to exceed the SCAQMD’s daily regional operational thresholds for VOC and NOx. Although incorporation of project design features would decrease VOC emissions by eight percent and NOx emissions by 36 percent, air quality impacts from project operational emissions would remain significant. DEIR fails to state how this operational impact would affect the residents and children at the four neighboring schools less than 500’ from the project.
- Under page I-59 of the I. Executive Summary (B) Air Quality (a) analysis of project impacts (2) Operation (d) Toxic Air Contaminants Impacts Evaluation (i) On-Site Sources “The primary source of potential air toxics associated with project operations include diesel particulate matter (DPM) from delivery trucks associated with the project’s commercial component (e.g., truck traffic on local streets and idling on adjacent streets). The DEIR fails to state how this would have a cumulative impact on the residents and children at the four neighboring schools less than 500’ from the project.
- Under page I-61 of the I. Executive Summary (B) Air Quality (b) cumulative impacts (1) Construction “Construction- related daily emissions at the project site would exceed the SCAQMD’s regional significance threshold for NOx with mitigation. Consequently, the project would have a cumulative impact due to construction-related regional NOx emissions even with incorporation of mitigation measures. Therefore only Alternative 1 will mitigate this negative impact.
- Under page I-61 of the I. Executive Summary (B) Air Quality (b) cumulative impacts (1) Construction “Additionally, the SCAQMD CEQA guidance does not require a HRA for short-term construction emissions. As such, cumulative TAC emissions impacts during construction would be less than significant”. DEIR fails to recognize other alternative such as not operating just by guideline standards and can recognize TAC impacts and the mitigations for such.
- Under page I-62 of the I. Executive Summary (B) Air Quality (b) cumulative impacts (2) Operation “Operational emissions from project buildout would exceed the SCAQMD’s regional operational thresholds for VOC and NOx even with incorporation of project design features. Operational emissions for the project under existing conditions would exceed the SCAQMD’s regional operational thresholds for VOC, NOx, and CO even with incorporation of project design features” and “Nonetheless, the emissions of non-attainment pollutants and precursors generated by project operation in excess of the SCAQMD project-level thresholds, for which the Air Basin is non-attainment, would remain cumulatively considerable”. Therefore only Alternative 1 will mitigate this negative impact.
- Under page I-64 of the I. Executive Summary (B) Air Quality (c) Project Design Features (e) Levels of Significance After Mitigation (1) Construction “However, even with the

incorporation of mitigation measures, the project would exceed the SCAQMD regional significance thresholds for NOx during excavation and grading activities. Regional NOx emissions would be reduced from 240 pounds per day to 225 pounds per day or 125 pounds over the 100 pounds per day SCAQMD significance threshold. This duration would be limited to approximately five months of the 48-month construction duration or 10 percent of total construction. As such, project construction would result in significant and unavoidable project-level and cumulative regional impacts with regard to NOx emissions even with incorporation of all feasible mitigation measures. Therefore only Alternative 1 will mitigate this negative impact.

- Under page I-64 of the I. Executive Summary (B) Air Quality (c) Project Design Features (e) Levels of Significance After Mitigation (2) Operations “Although there are no feasible mitigation measures to reduce the project’s impact from VOC or NOx emissions...” Therefore only Alternative 1 will mitigate this negative impact.

Cultural Resources

- Under page I-41 of the I. Executive Summary, Summary of Impacts Under the Project (D) Construction of the site will lead to “Significant and Unavoidable” impact. Therefore only Alternatives 1 and 5 will mitigate this negative impact. Alternative 5 will only mitigate if ALL possible Cultural Resources in the area are preserved.
- Under page I-71 of the I. Executive Summary (D) Cultural Resources (a) Analysis of Project Impacts (1) Historic Resources (a) Impacts Associated with Demolition of Historic Resources “Demolition of these buildings would result in significant impacts to historic resources. These impacts cannot be mitigated to a less-than-significant level”. DEIR has failed to look at other alternatives including moving the structures. Therefore only Alternative 1 will mitigate this negative impact.
- In an official letter “May 11, 2017, NOTICE OF COMPLETION AND AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT ENV-2015-2026-EIR, STATE CLEARINGHOUSE NO. 2015101073” from the City of LA signed by Alejandro A. Huerta, Environmental Review Coordinator, Major Projects & Environmental Analysis Section, LA City Department of Planning wrote:

“ANTICIPATED SIGNIFICANT ENVIRONMENTAL EFFECTS: Significant and unavoidable Project impacts have been identified with regard to regional air quality emissions for construction and operation, **demolition of historical resources**, on-site and off-site noise and vibration during construction, traffic intersection levels of service during construction, and traffic on residential street segments during operation.

- The DEIR states:
The project would demolish the following properties that have been identified as historically significant through survey evaluation:
 - a. 1547 - 1549 McCadden Place (1907)
 - b. Regency Revival courtyard apartment buildings 6700 Selma Ave and 1535 -1555 Las Palmas Ave. (1939)
 - c. Craftsman house 1542 McCadden Place (1910)
 - d. Commercial block 6683 Sunset Blvd. (1923)
 - e. Two story Craftsman duplex 1606-1608 Las Palmas Ave.

- f. Hollywood reporter Building 6713 Sunset Blvd.
- The DEIR states that demolition of these buildings would result in significant impacts to historic resources. These impacts cannot be mitigated to a less-than-significant level.
 - The proposed demolition of these surveyed historic resources violates the imperatives of the Hollywood community Plan and CEQA by failing to prioritize preservation of significant historic resources. As the EIR itself states there is no mitigation that will reduce this impact. The project is within a recognized historically significant area. The loss of these irreplaceable resources damages the historic integrity of the entire area.
 - The demolition of these resources must not be allowed. The project must either find a way to preserve these resources or it must not go forward.
 - CEQA requires that environmental protection be given significant consideration in the decision making process. Historic resources are included under environmental protection. Thus, any project or action which constitutes a substantial adverse change on a historic resource also has a significant effect on the environment and shall comply with the State CEQA Guidelines.

Geology and Soils

- The development project doesn't take into account the seismic activity in the area and the collapse that will result as this project is:
- Not able to be anchored to the bedrock as well as not being able to determine the depth of the caisson levels.
- The tallest structures are not designed to telescope into themselves during the collapse.
- The high water table levels in Hollywood which is why subterranean parking structures do not typically go past two levels in the area.
- The area is subject to Liquefaction as determined by the City of Los Angeles. The city data should be given priority as it is localized, while the state data may be erroneously affected by a larger data pool.
- The human rescue and cleanup efforts of this project site after a large seismic activity will be a large financial burden on the taxpayers and the state. The loss is greater than any possible financial benefits.

Greenhouse Gas (GHG) Emissions

- This EIR and the city have not included any analysis, data, projections or quantification of the release of the embedded carbon that would be released during demolition and construction. There is no data or analysis to show if it is less than that of the operation of the site. This would need to be conclusively analysed and shown through solid data and projections to qualify as a truly LEED eligible project. Therefore all analysis and findings are incomplete, as GHG readings are limited to construction and operation emissions and not ALL GHG impacts. The current DEIR is inadequate and incomplete and thereby must be withdrawn or followed by a revised subsequent draft EIR as the lack of definitions and quantifications prohibit proper development of reasonable alternatives and comparisons of current and proposed alternatives.
- Under page I-66 of the I. Executive Summary (C) Greenhouse Gas Emissions (a) Analysis of Project Impacts "...Green Building Code and the full implementation of current state mandates, the GHG emissions for the project would be approximately 315 metric

tons of equivalent mass of CO₂ (MTCO₂e) per year during construction and 18,051 MTCO₂e per year during operation of the project for a combined total of 18,365 MTCO₂e per year. The project would result in a decrease in GHG emissions that represents an approximate 38 percent reduction from the “no implementation of emissions reduction measures...”. DEIR fails to cite the data used to come to this conclusion.

- Under page I-66 of the I. Executive Summary (C) Greenhouse Gas Emissions (a) Analysis of Project Impacts “ Moreover, the project would be consistent with the regulations outlined in the AB32 Climate Change Scoping Plan, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by CARB’s “Climate Change Scoping Plan, the project would use “green building” features as a framework for achieving cross-cutting emissions reductions as new buildings and infrastructure would be designed to achieve the standards of the Silver Rating under LEED. DEIR fails to provide the data to show how this complies with AB 32 as well as defining “green building” and “cross cutting”.
- Under page I-66 of the I. Executive Summary (C) Greenhouse Gas Emissions (a) Analysis of Project Impacts “Similarly the project would be consistent with the regulations and reduction actions/strategies outlined in SCAG’s Regional Transportation Plan/ Sustainable Communities Strategy and the City of Los Angeles’ LA Green Plan. More specifically, as part of SCAG’s 2016-2040 RTP/SCS” and “The project would result in a VMT reduction of approximately 45 percent in comparison to NIERM and would be consistent with SCAG’s 2016-2040 RTP/SCS”. SCAG data has already been found to be faulty in regards to population growth projections in Hollywood Community Plan findings as was ruled in 2012. DEIR fails to take this into account. DEIR also fails to define the reduction from NEIRM. DEIR fails to clarify if the reduction is based from current operational uses on the projected uses without mitigation. The DEIR has not defined, described, demonstrated, or quantified what the baseline for the the NIERM is. It has to be stated and quantified at what point the measurement of the NIERM is taken and exactly what that measurement is. The VMT reduction is not specific. It must be a specific range of actual numbers based on specific numbers from the NIERM. This must be quantified with specific data from the 2016-2040 SCAG data. The DEIR totally lacks any demonstration and quantification of the proposed reductions and the relationship of those reductions from a specific baseline and to any specific standards.
- There is no demonstration of factual standards that show explicit quantification demonstrating that the Project would comply the LA Green Plan or any of the goals of that plan.
- The” compliance with regulatory measures and implementation of Project Design features” must be explicitly listed and cited. Define and state specific “regulatory measures”. The statement “identified throughout the Draft EIR” is vague and does not demonstrate compliance with specific regulatory measures, which must also be defined and stated.
- The current DEIR is inadequate and incomplete and does not conform to requirements of CEQA and thereby must be withdrawn or followed by a revised subsequent draft EIR as the lack of definitions and quantifications prohibit proper development of reasonable alternatives and comparisons of current and proposed alternatives.
- Under page I-66 of the I. Executive Summary (C) Greenhouse Gas Emissions (b) Cumulative Impacts: The lack of data, quantification and analysis of the possible actual GHGs of the project cannot be allowed to be omitted by the inadequate and highly vague

and general statement that “the emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect” Specific data must be provided to demonstrate conclusively that GHGs will not be emitted, if the data cannot so prove, the data showing the projected emission of GHGs must be provided. A lack of methodology to determine whether GHG emissions associated with a specific project represents new emissions or existing displaced emissions is not the same as a lack of effects. Any possible data showing the emissions of GHGs must be supplied and clearly shown. The current DEIR is inadequate and incomplete and does not conform to requirements of CEQA and thereby must be withdrawn or followed by a revised subsequent draft EIR as the lack of definitions and quantifications prohibit proper development of reasonable alternatives and comparisons of current and proposed alternatives.

- Under page I-69 of the I. Executive Summary (C) Greenhouse Gas Emissions (c) Project Design Features, Project Design Feature C-4: The DEIR has not defined, described, demonstrated, or quantified the GHGs that are extant or that are projected to be emitted by the demolition, building and operation of the Project. This renders it impossible to determine if the project would result in “no net additional GHG emissions”, It further renders it impossible to determine if purchasing voluntary carbon credits would offset the unknown emissions. (374,209 MT CO₂e). Without specific data, quantification and analysis the effectiveness of any mitigation measure is unknown and wholly inadequate. The current DEIR is inadequate and incomplete and does not conform to requirements of CEQA and thereby must be withdrawn or followed by a revised subsequent draft EIR as the lack of definitions and quantifications prohibit proper development of reasonable alternatives and comparisons of current and proposed alternatives.
- Under page I-70 of the I. Executive Summary (C) Greenhouse Gas Emissions (c) Project Design Features, Project Design Feature C-5: This section conflicts with assertions that no methodology for determining significant impacts of GHG asserted in the “Cumulative Effects sections on page I-67. There must be a resolution of these conflicting assertions and the data on the impacts of GHGs must be supplied. It is not adequate to wait 6 months after occupancy to determine impacts as the mitigation of impacts will be severely limited in terms of methods at that time. The impacts must be part of the decision making process and therefore must be projected, quantified and analysed. The current DEIR is inadequate and incomplete and does not conform to requirements of CEQA and thereby must be withdrawn or followed by a revised subsequent draft EIR as the lack of definitions and quantifications prohibit proper development of reasonable alternatives and comparisons of current and proposed alternatives.
- Under page I-70 of the I. Executive Summary (C) Greenhouse Gas Emissions (d) Mitigation Measures: The DEIR has not defined, described, demonstrated or quantified the mitigation measures nor how they will specifically mitigate the issues in this section. More data must be provided with specific analysis as to the impacts to be mitigated. Complete data on what the entire life cycle cumulative impacts of the entire carbon footprint, including GHGs of the project must be provided, quantified and analysed. This includes, but is not limited to: the environmental impacts of the raw materials used to manufacture all materials to be used in the project, the impacts of manufacturing and assembling said materials and transporting materials to the construction site. The impacts of all energy and resources used in the construction of the project, including but not limited to: electrical power, water, fuel and natural gas. The impacts of demolition of existing structures and materials now on the site, including all

resources used to demolish, haul away and disposal of said materials. This includes impacts including GHGs produced in landfills and other types of disposal methods. The impact of use of the disposal facilities, including, but not limited to, landfills and other disposal sites of the city and county of Los Angeles. The environmental impacts of the materials and the impacts of the construction in the existing structures must also be included to have a full picture of the environmental impacts of the project.

Hazards and Hazardous Materials

- The DEIR has not adequately defined, described, demonstrated, or quantified the hazardous materials that may be present at the site or may be brought in through construction. There many structures of various ages that proposed to be demolished and no adequate analysis of what those structures may be composed of and what will be required to safely demolish and dispose of the materials involved will be. The language is overly broad and self serving to expedite the demolition and construction process. This renders it impossible to determine what the project consequences may be in terms of hazardous materials. There is no data to fully quantify or analyse the impacts any hazardous materials may have on the entire ecosystem and the system of disposal and containment of the City and County of LA, nor the costs that could be borne by residents and taxpayers. Without specific data, quantification and analysis the effectiveness of any mitigation measure is unknown and wholly inadequate. The current DEIR is inadequate and incomplete and does not conform to requirements of CEQA and thereby must be withdrawn or followed by a revised subsequent draft EIR as the lack of definitions and quantifications prohibit proper development of reasonable alternatives and comparisons of current and proposed alternatives.

Hydrology and Water Quality

- The state of California is still suffering the effects of a prolonged drought. Most climate projections show a continuing and worsening lack of water resources for the entire state and especially the Southern part of Ca. No data, description or analysis of the impact of bringing ever more population and activity that creates a higher demand for water to an area already stressed in terms of quantity of water supply, quality and management is provided. This must be provided. The infrastructure of the Hollywood area has not been upgraded in any meaningful way in over 20 years. The current infrastruc is not sufficient to support both the increase in potable water supply the project will cause nor the increase in waste water. The stress this will cause to the aging and inadequate infrastructure is not fully described, quantified or analysed. There must be specific factual data showing the additional demands and outlining the specific and exact upgrades the project will require to the infrastructure. The mitigation measures must fully and adequately reflect these upgrades and the project must include requirements to construct or fully pay for all phases of construction for these upgrades. If that is not done then the project must not go forward. A reduced project that exactly corresponds to the demands placed to the current capacity or only to the exact additional capacity is built or funded by the project should be all that is allowed to go forward. The current DEIR is inadequate and incomplete and does not conform to requirements of CEQA and thereby must be withdrawn or followed by a revised subsequent draft EIR as the lack of definitions and quantifications prohibit proper development of reasonable alternatives and comparisons of current and proposed alternatives.

Land Use

- This DEIR doesn't take into account the economic discrimination this project will bring into the area which currently allows for a mixture of all economic classes.
- Under page I-115 of the I. Executive Summary (H) Land Use (a) Analysis of Project Impacts (1) Consistency with Local Plans and Applicable Policies (a) Los Angeles General Plan (i) Los Angeles General Plan Framework Element, Housing Chapter: "The project would support the City's objective to plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types". DEIR fails to acknowledge the need for All types of Housing as is found under the Housing Element of the General Plan. Project only supplies market rate of which there is an 8% vacancy rating currently in the Hollywood area, and the 84 very low income. There are no other housing options. Therefore this project does not comply with the general plan.
- Under page I-115 of the I. Executive Summary (H) Land Use (a) Analysis of Project Impacts (1) Consistency with Local Plans and Applicable Policies (a) Los Angeles General Plan (i) Los Angeles General Plan Framework Element, Housing Chapter: "84 units would be dedicated as affordable housing units to replace the 84 RSO units that would be removed". DEIR fails to state that the removal of the RSO units will cause displacement of the tenants who currently are housed there. The very low income units would only be offered to residents who already qualify thru city or county programs. Current tenants are not able to qualify for these programs as the application lists are currently closed.
- Under page I-119 of the I. Executive Summary (H) Land Use (a) Analysis of Project Impacts (1) Consistency with Local Plans and Applicable Policies (a) Los Angeles General Plan (ii) Los Angeles General Plan Conservation Element "Consequently, the demolition of these six properties would not be consistent with the objective and policy for the conservation of cultural and historic resources set forth in the Conservation Element". DEIR admits to being in violation of the Los Angeles General Plan, thereby the full DEIR must be withdrawn.
- Under page I-119 of the I. Executive Summary (H) Land Use (a) Analysis of Project Impacts (1) Consistency with Local Plans and Applicable Policies (a) Los Angeles General Plan (iii) Los Angeles General Plan Housing Element "The project would provide a variety of housing types" and "expand affordable rental housing for all income groups" and "preserve quality rental and ownership housing for households of all income levels". DEIR is grossly inadequate in its findings of the project offering affordable rental housing. Project fails to provide housing for all income levels, and as such the DEIR must be withdrawn as it is in violation of the policies set forth in the Housing Element.
- Under page I-119 of the I. Executive Summary (H) Land Use (a) Analysis of Project Impacts (1) Consistency with Local Plans and Applicable Policies (a) Los Angeles General Plan (v) Hollywood Community Plan. "Although the project would result in significant and unavoidable impacts at five study intersections, the project would partially support the City's objective to make provisions for a circulation system coordinated with land uses and densities through the development of a mixed-use development". The DEIR can not be referencing the Hollywood Plan as it is grossly in conflict with the plan. The Hollywood Community Plan clearly states in Objectives of the Plan (6) To make provisions for a circulation system coordinated with land uses and densities and adequate to accommodate traffic.

The Hollywood Community Plan clearly states in Objectives of the Plan (7) To encourage the preservation of open space consistent with property rights when privately owned and to promote the preservation of views, natural character and topography of mountainous parts of the Community for the enjoyment of both local residents and persons throughout the Los Angeles region. Under Housing of the Community Plan, Standards and Criteria “The intensity of residential land use in this Plan and the density of the population which can be accommodated thereon, shall be limited in accordance with the following criteria (2) The availability of sewers, drainage facilities, *fire protection services and facilities*, and other public utilities”.

Under Housing of the Community Plan, Features “The low-density residential character of many parts of Hollywood should be preserved, and lower density (Low medium I or more restrictive) residential neighborhoods should be protected from encroachment by other types of uses.

Hollywood Community Plan clearly states in Circulation, Standards and Criteria “No increase in density shall be effected by zone change or subdivision unless it is determined that the local streets, Boulevards and Avenues, freeways, and public transportation available in the area of the property involved, are adequate to serve the traffic generated”.

- Under page I-122 of the I. Executive Summary (H) Land Use (a) Analysis of Project Impacts (1) Consistency with Local Plans and Applicable Policies (b) Community Redevelopment Agency (CRA/LA) Hollywood Redevelopment Plan “Specifically, Section 506.2.3 permits the increased FAR provided that the proposed development *further the goals and intent of this Plan* and the Community Plan and meets objective “a” below and at least one of the other objectives”. The DEIR uses conflicting data in its analysis to come to conclusions that benefit the developer and do not stay neutral in its findings. This DEIR does not further the goals and intent of the CRA/LA Hollywood Redevelopment Plan. This DEIR doesn’t conform with the Hollywood Redevelopment Plan goals (1), (3), (4), (5a), (5b), (5g), (5h), (7g), (9), (10), (11), (12), (13), (14), (15), and (16) .

III. 300. REDEVELOPMENT PLAN GOALS

1) Encourage the involvement and participation of residents, business persons, property owners, and community organizations in the redevelopment of the community.

3) Promote a balanced community meeting the needs of the residential, commercial, industrial, arts and entertainment sectors.

4) Support and encourage the development of social services with special consideration given to participating in projects involving community based organizations that serve runaways, the homeless, senior citizens and provide child care services and other social services.

5) Improve the quality of the environment, promote a positive image for Hollywood and provide a safe environment through mechanisms such as:

a) adopting land use standards;

b) promoting architectural and urban design standards including: standards for height, building setback, continuity of street facade, building materials, and compatibility of new construction with existing structures and concealment of mechanical appurtenances;

- c) promoting landscape criteria and planting programs to ensure additional green space;
- d) encouraging maintenance of the built environment;
- e) promoting sign and billboard standards;
- f) coordinating the provision of high quality public improvements;
- g) *promoting rehabilitation and restoration guidelines;*
- h) *integrate public safety concerns into planning efforts.*

7) Promote the development of Hollywood Boulevard within the Hollywood commercial core as a unique place which:

- a) reflects Hollywood's position as the entertainment center;
- b) provides facilities for tourists;
- c) contains active retail and entertainment uses at the street level;
- d) provides for residential uses;
- e) is pedestrian oriented;
- f) is a focus for the arts, particularly the performing arts; and
- g) *recognizes and reinforces its history and architecture.*

9) Provide housing choices and increase the supply and improve the quality of housing for all income and age groups, especially for persons with low and moderate incomes; and to provide homeownership opportunities and other housing choices which meet the needs of the resident population.

10) Promote the development of sound residential neighborhoods through mechanisms such as land use, density and design standards, public improvements, property rehabilitation, sensitive in-fill housing, *traffic and circulation programming*, development of open spaces and other support services necessary to enable residents to live and work in Hollywood.

11) Recognize, promote and support the retention, restoration and *appropriate reuse of existing buildings*, groupings of buildings and other physical features especially those having significant historic and/or architectural value and ensure that new development is sensitive to these features through land use and development criteria.

12) *Support and encourage a circulation system which will improve the quality of life in Hollywood*, including pedestrian, *automobile, parking* and mass transit systems with an emphasis on *servicing existing facilities and meeting future needs.*

13) Promote and encourage the development of health, education, child and youth care, and senior citizen facilities and programs to enable the development of a community with a variety of lifestyles.

14) Promote and encourage development of recreational and cultural facilities and open spaces necessary to support attractive residential neighborhoods and commercial centers.

15) Promote the development of the varied ethnic communities in Hollywood.

16) To the maximum extent feasible, seek to build replacement housing within the Project Area prior to the destruction or removal of dwelling units which house low and moderate income people. The Agency shall make a good faith effort to relocate displacees within the Project Area unless they choose to relocate elsewhere. Project displacees shall be provided a priority for occupancy in housing which the Agency has facilitated.

- Under page I-122 of the I. Executive Summary (H) Land Use (a) Analysis of Project Impacts (1) Consistency with Local Plans and Applicable Policies (b) Community Redevelopment Agency (CRA/LA) Hollywood Redevelopment Plan (Footnote 2) “However only Development Parcel D is located within the Redevelopment Plan Area”. DEIR grossly describes the applicable redevelopment plan area which was a broad area encompassing most of central Hollywood.
- Under page I-122 of the I. Executive Summary (H) Land Use (a) Analysis of Project Impacts (1) Consistency with Local Plans and Applicable Policies (c) Los Angeles Municipal Code (LAMC) “Height District 2 within the C4 zones does not impose a height limitation and has a maximum FAR of 6:1” and “However, with the approval of the requested discretionary actions, including a zone change to replace the “D” Limitation to reflect the project, the project would comply with the requirements of the LAMC”. DEIR fails to acknowledge the judge’s ruling WARNER RIDGE ASSOCIATES, Plaintiff and Respondent, v. CITY OF LOS ANGELES; Joy Picus; John Ferraro; Zev Yaroslavsky, etc., et al., Defendants and Appellants. Civ. No. B052835. “Such an ordinance is not ‘consistent’ with the plan in any meaningful sense of the word ‘consistent’ nor in any sense in which the word ‘consistent’ has been used in the case law” and “The tail does not wag the dog”. The DEIR can not say it is consistent when being consistent would only happen by removing the law that is currently the reason that the project is not consistent.

Noise

- This DEIR doesn’t take into account the high noise levels associated with people leaving an area of alcohol consumption. The site is requesting 22 liquor license. This will equate to 22 times the average noise impact on a community as a single on site alcohol sales establishment creates.
- Under page I-133 of the I. Executive Summary (I) Noise (a) Analysis of Project Impacts (2) Construction Vibration “However, the estimated ground borne vibration levels from heavy construction equipment (e.g., larger bulldozer, drill rig, loaded truck) would exceed the 0.12 PPV significance threshold at the Crossroads of the World Buildings located on-site, at the First Baptist Church building located on the east side of Las Palmas, and at the Blessed Sacrament Church building located on the north side of Sunset Boulevard” and “Mitigation Measure I-2 would be implemented to reduce vibration impacts on the potentially impacted buildings to a less-than-significant level”. DEIR fails to state what other options shall be looked at if the “feasible steps to reduce vibration level” during construction will not be able to be met. DEIR also fails to state any other options should the project fail to meet the Secretary of the Interior’s Standards in case repairs must be done.
- Under page I-137 of the I. Executive Summary (I) Noise (a) Analysis of Project Impacts (3) Noise from Project Operation (ii) Outdoor Spaces “which may include the use of such facilities in the early morning hours and at nighttime until 2:00 A.M.” and “the amplified sound system used in outdoor areas must be designed so as not to exceed the maximum noise levels of 80 to 95 dBA”. DEIR is inadequate and incomplete in its analysis. The

DEIR doesn't analyze the lack of any other sound barriers at such a height and the distance that sound travels across the Hollywood region.

Population and Housing

- The project uses SCAG projects which have already been determined to be intentionally erroneous as found by LA MIRADA AVE. NEIGHBORHOOD ASSOCIATION OF HOLLYWOOD, Plaintiff and Respondent, v. CITY OF LOS ANGELES, Defendants and Appellants. Civ. No. BS138370 and BS13858. The EIR should only be using Census data as SCAG data has been proven to not be reliable or findings made with neutrality.
- The proposed project will not replace the loss of truly affordable RSO housing, as RSO can only apply to structures built and occupied prior to 1978.
- The proposed project doesn't meet the requirements of LA City RSO Ord. **#184873**, which would require a total of 190 affordable units to be built as it needs to be a one for one replacement, or 20%, whichever is greater. 84 units does not meet this requirement as this is only the one for one and not the greater of the two.
- Encouragement of these types of luxury developments in Hollywood puts existing rental properties and therefore tenants at high risk of displacement. The EIR and the city of Los Angeles have not conducted enough research in regards to the cumulative loss of RSO housing and the increase of putting residents into "at risk" categories for homelessness due to the removal of the RSO housing.
- This DEIR fails to account for the Hollywood Redevelopment Plan that requires 30% of all new housing construction must include

Public Services

- The project will significantly impact the response time of emergency responders. The developer has claimed the site will have a built in emergency response substation, but has failed to secure the budget needed to pay for the emergency responders to be staffed on site.

Traffic, Access, and Parking

- The project claims it will encourage the increase in the use of public transportation. The EIR and this city fail to provide research as to why we **don't** have a massive increase in public transportation ridership based on the transit oriented high density developments that have already been constructed.
- It will create more traffic due to a lack of ample parking. The EIR and city have not conducted research in regards to the deterioration of required parking rules and the link to the decrease in quality of life for the residents due to the anxiety and frustration of attempting to park in areas where developments are allowed to decrease the required parking.
- This DEIR doesn't take into account the loss of financial access that residents will have who are not able to afford the services provided on site, and therefore will not be able to have financial access to the site.
- The DEIR fails to take into account the impact of the usage of the pedestrian passageway (i.e. a pedestrian paseo) diagonally across Las Palmas and what this would do to impact the circulation of traffic.

- This DEIR fails to cite the largely private usage this complex will have on Las Palmas boulevard. As the road is part of the project site, and the current road is being removed, it will become a private drive usage for the complex. This DEIR fails to take into account the loss of Las Palmas and the effect it will have on the circulation system. This was also the case in the EastTown apartment complex, 6201 W Hollywood Blvd.
- This DEIR fails to analyze and incorporate the increase in pedestrian-related accidents due to impact from bicycles.
- Under page I-44 of the Executive Summary, under the Summary of Impacts Under the Project (L) Construction and Operation of the site will lead to “Significant and Unavoidable” impact on already “F” rated intersections. This is why the only way to mitigate this negative impact on the community, as well as making sure it is cohesive with the Hollywood Redevelopment Plan is Alternative option 1: No Project/ No Build Alternative.
- Under page I-183 of the I. Executive Summary (L) Traffic, Access, and Parking (a) Analysis of Project Impacts (1) Construction Impacts (a) Shoring/Excavations - Vehicle Trips “Hauling of material from the project site would occur on weekdays between 7:00 A.M. and 3:00 P.M...approximately 400 haul trucks per work day” and “An average of 20 delivery trucks per day is expected during the excavation and grading period. Thus up to 840 daily truck trips (420 inbound, 420 outbound) are forecasted to occur during the excavation and grading period, with approximately 106 trips per hour (53 inbound, 53 outbound) uniformly over a typical 8 - hour workday. DEIR fails to account how this will impact circulation during heavy use hours of rush hour to other streets outside of the project boundaries including as far south as Santa Monica Boulevard.
- Under page I-184 of the I. Executive Summary (L) Traffic, Access, and Parking (a) Analysis of Project Impacts (1) Construction Impacts (a) Shoring/Excavations - Vehicle Trips “Given the project site’s proximity to US-101, it is anticipated that outbound traffic from the project site would travel on Highland Avenue to access US-101 northbound or on Sunset Boulevard to access US-101 southbound. Inbound traffic would take the reverse route from US-101”. DEIR fails to state what the impact would be on circulation during heavy use hours.
- Under page I-185 of the I. Executive Summary (L) Traffic, Access, and Parking (a) Analysis of Project Impacts (1) Construction Impacts (c) Realignment of Las Palmas Avenue “The rerouting of the sewer mains on Cassil Place would require complete closure of the segment during daytime hours only”. DEIR fails to take into account the loss of parking for the residents on Cassil. There has been no mitigation cited for relocating parking for the residents impacted by this loss of parking during the daytime hours.
- Under page I-185 of the I. Executive Summary (L) Traffic, Access, and Parking (a) Analysis of Project Impacts (1) Construction Impacts (d) Potential Impacts of Construction Traffic (i) Temporary Traffic Impacts “Nearly all haul truck activity and construction worker trips would occur outside of the A.M. and P.M. peak periods, haul truck and construction worker activity during the excavation and grading phase is not anticipated to contribute a substantial amount of traffic during the weekday A.M. and P.M. peak periods”. DEIR conflicts with finding under page I-183 of the I. Executive Summary (L) Traffic, Access, and Parking (a) Analysis of Project Impacts (1) Construction Impacts (a) Shoring/Excavation-Vehicle Trips “during the shoring/excavation phase, hauling of material from the Project Site would occur on weekdays between 7:00 A.M. and 3:00 P.M.”

- Under page I-186 of the I. Executive Summary (L) Traffic, Access, and Parking (a) Analysis of Project Impacts (1) Construction Impacts (d) Potential Impacts of Construction Traffic (i) Temporary Traffic Impacts “Thus, the traffic volumes associated with the existing uses were removed from the Study Area”. The DEIR fails to cite current traffic plan data from the Sunset and Highland intersection. The DEIR does not describe, demonstrate, or quantify how hauling will interact with car traffic on Highland and Sunset.
- Under page I-187 of the I. Executive Summary (L) Traffic, Access, and Parking (a) Analysis of Project Impacts (1) Construction Impacts (d) Potential Impacts of Construction Traffic (ii) Access and Safety Impacts “Since the sidewalks fronting the Project Site would be closed intermittently during the construction period, pedestrian access to other parcels fronting adjacent streets may be temporarily blocked. Consequently, the use of the public right-of-way along Highland Avenue, McCadden Place, Las Palmas Avenue, Selma Avenue, and Sunset Boulevard would require temporary rerouting of pedestrian traffic”. The DEIR fails to describe or quantify how the construction period could impact nearby local businesses.
- Under page I-187 of the I. Executive Summary (L) Traffic, Access, and Parking (a) Analysis of Project Impacts (1) Construction Impacts (d) Potential Impacts of Construction Traffic (ii) Access and Safety Impacts “Construction activities associated with the Project could also potentially impact the provision of services by the Los Angeles Fire Department in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. In particular, Highland Avenue is a designated disaster/emergency route by the City’s Safety Element and County of Los Angeles Department of Public Works” and “However, as discussed above, most of the construction worker trips would occur outside the weekday peak traffic periods, thereby reducing the potential for traffic-related conflicts”. DEIR conflicts with finding under page I-183 of the I. Executive Summary (L) Traffic, Access, and Parking (a) Analysis of Project Impacts (1) Construction Impacts (a) Shoring/Excavation-Vehicle Trips “during the shoring/excavation phase, hauling of material from the Project Site would occur on weekdays between 7:00 A.M. and 3:00 P.M.”
- Under page I-187 of the I. Executive Summary (L) Traffic, Access, and Parking (a) Analysis of Project Impacts (1) Construction Impacts (d) Potential Impacts of Construction Traffic (ii) Access and Safety Impacts “Furthermore, Section 21806 of the California Vehicle Code allows drivers of emergency vehicles to avoid traffic through the use of sirens and flashing lights to clear a path of travel”. DEIR does not consider the reality that during peak hours, commuter vehicles stuck in congestion are unable to move to “clear a path of travel” for emergency vehicles.
- Under page I-193 of the I. Executive Summary (L) Traffic, Access, and Parking (a) Analysis of Project Impacts (2) Impacts during Operation (b) Regional Transportation System (i) CMP Freeway Segment Analysis “The closest mainline freeway monitoring location to the Project Site is on US-101 south of Santa Monica Boulevard, approximately two miles southeast of the Project Site” and “Therefore, Project impacts to a Congestion Management Program (CMP) mainline freeway monitoring location would be less than significant”. DEIR conflicts with finding I-185 of the I. Executive Summary (L) Traffic, Access, and Parking (a) Analysis of Project Impacts (1) Construction Impacts (d) Potential Impacts of Construction Traffic (i) Temporary Traffic Impacts “Nearly all haul truck activity and construction worker trips would occur outside of the A.M. and P.M. peak periods, haul truck and construction worker activity during the excavation and grading phase is not anticipated to contribute a substantial amount of traffic during the weekday A.M. and P.M.

peak periods". Additionally, DEIR does not provide a definition for data, analysis, and finding for "Congestion Management Program (CMP)".

- Under page I-194 of the I. Executive Summary (L) Traffic, Access, and Parking (a) Analysis of Project Impacts (2) Impacts during Operation (b) Regional Transportation System (iii) Public Transit "Therefore, cumulative impacts on public transit would be less than significant". DEIR does not provide a definition for data, analysis, and finding for "cumulative impacts on public transit would be less than significant," as it is based on the undefined "Congestion Management Program (CMP)"
- Under page I-200 of the I. Executive Summary (L) Traffic, Access, and Parking (a) Analysis of Project Impacts (3) Caltrans Facilities Analysis "Thus, further consultation was conducted with Caltrans and analyses of Caltrans facilities. The analysis below follows the guidelines found in the Caltrans Traffic Impact Study (TIS) Guide". DEIR lacks definition, demonstration, and quantification of "further consultation".
- Under page I-201 of the I. Executive Summary (L) Traffic, Access, and Parking (a) Analysis of Project Impacts (3) Caltrans Facilities Analysis (a) Freeway Mainline Segments "The following eight freeway mainline segments on US-101 were analyzed using HCM methodology: US-101 between Barham Boulevard and Highland Avenue US-101 between Highland Avenue and Cahuenga Boulevard US-101 between Cahuenga Boulevard and Gower Street/Argyle Avenue US-101 between Gower Street/Argyle Avenue and Hollywood Boulevard US-101 between Hollywood Boulevard and Sunset Boulevard US-101 between Sunset Boulevard and Western Avenue US-101 between Western Avenue and Santa Monica Boulevard US-101 between Santa Monica Boulevard and Melrose Avenue". DEIR lacks definition, demonstration, and quantification of "HCM methodology".
- Under page I-207 of the I. Executive Summary (L) Traffic, Access, and Parking (b) Cumulative Impacts (1) Construction Impacts "The construction of 145 related projects is assumed in the Study Area". The DEIR lacks definition, demonstration, and quantification of the 145 related projects assumed in the Study Area.
- Under page I-207 of the I. Executive Summary (L) Traffic, Access, and Parking (b) Cumulative Impacts (1) Construction Impacts "along Sunset Boulevard and north and south of the Project Site that travel north along Highland Avenue to access the US-101 Freeway" and "Highland Avenue and Hollywood Boulevard during the A.M. and P.M. peak hours". DEIR fails to include the project's impact as far south as Santa Monica Boulevard.
- Under page I-207 of the I. Executive Summary (L) Traffic, Access, and Parking (b) Cumulative Impacts (1) Construction Impacts "The nearest bus stop to the project Site is located on Sunset Boulevard in front of the Blessed Sacrament Church, approximately 250 feet from construction activities in Development Parcel C. Therefore, the Project's impact to access and safety and to transit during construction would not be cumulatively considerable and would be less than significant". DEIR grossly underestimates the safety impact on low income residents who utilize the Blessed Sacrament Church bus stop. DEIR fails to analyze the pedestrian pathways that will be significantly impacted since the considerable Parcel C construction "would provide approximately 50,000 square feet of retail and restaurant uses".
- Under page I-207 of the I. Executive Summary (L) Traffic, Access, and Parking (b) Cumulative Impacts (1) Construction Impacts "Installation of construction fences during Project construction could result in the temporary loss of metered parking spaces on Highland Avenue, McCadden Place, Las Palmas Avenue, Selma Avenue, and Sunset

Boulevard. However, the Project would implement a Construction Management Plan that would include providing advanced notification of temporary parking removals and duration of removals. Therefore, the Project's impact to on-street parking would not be cumulatively considerable and would be less than significant". DEIR fails to cite current data on "metered parking spaces on Highland Avenue, McCadden Place, Las Palmas Avenue, Selma Avenue, and Sunset Boulevard. DEIR does not describe, define, demonstrate, or quantify how "notification of temporary parking removals" will lessen the impact the Project will have to on-street parking.

- Under page I-208 of the I. Executive Summary (L) Traffic, Access, and Parking (b) Cumulative Impacts (2) Impacts from Operation "The proposed mitigation would reduce several of the significant traffic impacts to less than significant levels". DEIR lacks data to support how the proposed mitigation would reduce traffic impacts to "less than significant levels".
- Under page I-208 of the I. Executive Summary (L) Traffic, Access, and Parking (b) Cumulative Impacts (2) Impacts from Operation (b) Regional Transportation System (i) CMP Freeway Segment Analysis "The freeway mainline segment would operate at LOS F in the southbound direction under both Existing with Project and Future with Project Conditions. However, the addition of Project traffic to future conditions, which include traffic volumes associated with ambient growth and the related projects, would not cause D/C ratio to increase by 0.02 at this monitoring location. Therefore, the Project's impacts with regard to the CMP mainline freeway monitoring locations would be less than significant and would not be cumulatively considerable". DEIR does not define Existing with Project, Future with Project, D/C ratio. Statement is overly complicated and not suitable for general public review and comment. Revise, define, quantify, and recirculate.
- Under page I-208 of the I. Executive Summary (L) Traffic, Access, and Parking (b) Cumulative Impacts (2) Impacts from Operation (b) Regional Transportation System (i) CMP Freeway Segment Analysis "However, the addition of Project traffic to future conditions, which include traffic volumes associated with ambient growth and the related projects, would not cause D/C ratio to increase by 0.02 at this monitoring location. Therefore, the Project's impacts with regard to the CMP mainline freeway monitoring locations would be less than significant and would not be cumulatively considerable". DEIR does not define, describe, demonstrate or quantify how the addition of Project traffic to future conditions would not cause D/C ratio to increase by 0.02 at this monitoring location.
- Under page I-208 of the I. Executive Summary (L) Traffic, Access, and Parking (b) Cumulative Impacts (2) Impacts from Operation (b) Regional Transportation System (ii) CMP Arterial Monitoring Station Analysis "Similar to the freeway segment analysis above, the CMP analysis of arterial monitoring stations accounted for forecasted traffic increases due to ambient growth, as well as the related projects through the year 2022". DEIR uses population trends and projections based on SCAG growth forecast as defined section IV Environmental Impact Analysis J.3 Population 1. Introduction. SCAG projects have already been determined to be intentionally erroneous as found by LA MIRADA AVE. NEIGHBORHOOD ASSOCIATION OF HOLLYWOOD, Plaintiff and Respondent, v. CITY OF LOS ANGELES;, Defendants and Appellants. Civ. No. BS138370 and BS13858. The EIR should only be using Census data as SCAG data has been proven to not be reliable or findings made with neutrality.

- Under page I-208 of the I. Executive Summary (L) Traffic, Access, and Parking (b) Cumulative Impacts (2) Impacts from Operation (b) Regional Transportation System (ii) CMP Arterial Monitoring Station Analysis “Each of the related projects is required to conduct its own CMP analysis and identify mitigation measures to ensure that impacts to CMP arterial monitoring intersections are reduced to a less-than-significant level, as much as feasible”. DEIR does not define, describe, demonstrate, or quantify what is “less-than-significant” nor “as much as feasible”.
- Under page I-208 of the I. Executive Summary (L) Traffic, Access, and Parking (b) Cumulative Impacts (2) Impacts from Operation (b) Regional Transportation System (iii) Public Transit “Furthermore, public transit providers would add additional service when required in order to accommodate cumulative demand in the region. Given this assumption and the current additional available capacity of transit in the vicinity of the Project Site, the Project’s impacts with regard to transit would not be cumulatively considerable.” The DEIR has not defined, described, demonstrated, or quantified the aforementioned “assumption” of an increase in additional public transit services.

Utilities and Service Systems

- Under page I-233 of the I. Executive Summary (M.3) Utilities and Services Systems - Solid Waste (a) Analysis of Project Impacts (2) Operational Impacts (b) Solid Waste Recycling and Disposal Facilities “Operation of the new uses on the project site would generate solid waste” and “ 11 tons per day”. Under page I-234 of the I. Executive Summary (M.3) Utilities and Services Systems - Solid Waste (a) Analysis of Project Impacts (2) Operational Impacts (b) Solid Waste Recycling and Disposal Facilities “The County of Los Angeles Report (2014 Annual Report) Concluded that with no new landfills, no expansions of existing landfills, and no additional capacity from alternative technologies, a shortage of permitted solid waste disposal capacity at in-County Class III landfills was projected in 2029”. Under page I-239 of the I. Executive Summary (M.3) Utilities and Services Systems - Solid Waste (a) Analysis of Project Impacts (2) Operational Impacts (d) Mitigation Measures “Project-level and cumulative impacts with regard to solid waste would be less than significant without mitigation. The DEIR has not adequately defined, described, demonstrated, or quantified the disposal of the waste materials that may be present at the site during operation or may be brought in through construction. The language is overly broad and self serving to expedite the demolition and construction process. This renders it impossible to determine what the project consequences may be in terms of waste disposal. There is no data to fully quantify or analyse the impacts any solid waste disposal may have on the entire ecosystem and the system of disposal and containment of the City and County of LA, nor the costs that could be borne by residents and taxpayers. Without specific data, quantification and analysis the effectiveness of any mitigation measure is unknown and wholly inadequate. The current DEIR is inadequate and incomplete and does not conform to requirements of CEQA and thereby must be withdrawn or followed by a revised subsequent draft EIR as the lack of definitions and quantifications prohibit proper development of reasonable alternatives and comparisons of current and proposed alternatives.
- Under page I-185 of the I. Executive Summary (L) Traffic, Access, and Parking (a) Analysis of Project Impacts (1) Construction Impacts (c) Realignment of Las Palmas Avenue “The realignment would also include on-site and off-site improvements to the existing sanitary sewer system”. DEIR has not adequately defined, described,

demonstrated, quantified, or analyzed the impact of connecting the newer sanitary sewer system line to any currently existing 100 year old infrastructure. The DEIR fails to acknowledge the impact that this would have. DEIR also fails to acknowledge that this is not an adequate mitigation to the needed expansion of solid waste disposal locations. The taxpayer burden to mitigate the needed expansion of solid waste disposal locations has not been adequately defined, described, demonstrated, quantified, or analyzed.

Jobs and Economic Improvement through Environmental Leadership Act (Assembly Bill 900)

1. Page I-7 under I. Executive Summary (2) The project would create high-wage, highly skilled jobs that pay prevailing wages and provide construction jobs and permanent jobs for Californians, and help reduce unemployment;
 - This DEIR doesn't include the definition of "high-wage, highly skilled jobs". It is unclear if the high-wage, highly skilled jobs are in the temporary construction or long term usage of the site. If it is the construction only, than that is not a permanent on site job that will be high wage. If the consultant is determining that the 22 on site alcohol licenses will create "high-wage, highly skilled jobs", than those jobs need to be expanded upon into exactly what the jobs are and how the long term on site jobs would be classified as "high-wage, highly skilled jobs".

2. Page 1-7 under I. Executive Summary (2) The project would provide unbundled parking for the residential, with the exception of the affordable residential dwelling units, pursuant to PRC section 21184.5, as amended by SB 734.
 - This DEIR and PRC section 21184.5 amended by SB 734 have failed to study the direct correlation between the increases in accidents and the unbundling of parking as it impacts a community. It also fails to take into consideration the loss of quality of life, and the increase of assaults that stem from the increase of frustration and anxiety when there is an intentional reduction in parking.
 - The use of unbundled parking is a direct violation of the Hollywood Redevelopment Plan which cites on redevelopment plan goal 12) Support and encourage a circulation system which will improve the quality of life in Hollywood, including pedestrian, **AUTOMOBILE, PARKING** and mass transit systems with an emphasis on serving existing facilities and meeting **FUTURE NEEDS**.

3. Page 1-9 under I. Executive Summary (2) According to Section 21184(b)(2)(c) of the PRC, if "the Joint Legislative Budget Committee fails to concur or nonconcur on a determination by the Governor within 30 days of the submittal, the leadership project is deemed to be certified." Since the Joint Legislative Budget Committee failed to concur or nonconcur by December 31, 2016, the Project has been deemed certified.
 - This DEIR and project can not be deemed "certifiable" as the project has not been completed to determine if it has actually (2) created high-wage, highly skilled jobs that pay prevailing wages and living wages...and help reduce unemployment;
 - This DEIR and project can not be deemed "certifiable" as the project has not been completed to determine if it has actually (4) not resulted in any net additional GHG emissions, including GHG emissions from employee transportation;
 - This DEIR and project can not be deemed "certifiable" as the project has not been completed to determine if it has actually (5) entered into a binding and enforceable agreement that all mitigation measures required pursuant to Division 13 of the PRC to certify the project shall be conditions of approval of the Project, and those conditions HAVE ALREADY been enforced by the lead agency;

- This DEIR and project can not be deemed “certifiable” as the project has not been completed to determine if the applicant has secured funds into an escrow account for (6) The applicant would agree to pay the costs of the Court of Appeal in hearing and deciding any case, including payment of the costs for the appointment of a special master if deemed appropriate by the court;

Overview of the project:

1. Page I-10 under I. Executive Summary states “The Project also includes vehicular and pedestrian circulation of improvements, including the realignment of Las Palmas Avenue at Sunset Boulevard”.
 - The DEIR does not include historical information as to why the intersection sits as it does.
 - The project wouldn’t be able to offset the Las Palmas intersection at Selma, thus not creating a better circulation flow in regards to the Las Palmas and Sunset intersection, as the circulation will be negatively impacted by the project. Correcting the road won’t improve traffic at the intersection due to the increase in traffic the project will bring.
2. Page I-10 under I. Executive Summary states “It is anticipated that approximately 83,200 square feet and 40,000 square feet of the proposed retail area would consist of restaurant uses and a supermarket, respectively”. The DEIR fails to state why the community needs over one million square feet of development to instal a supermarket into the community.
3. Page I-12 under I. Executive Summary states “The project design would create a *vibrant new district*”. DEIR fails to describe why the surrounding and existing district of Hollywood isn’t already vibrant, and why there is a need to create a new district within an already existing district.
4. Page I-14 under the I. Executive Summary (b) Setback and FAR, the DEIR states “The project would include approximately 1,432,500 square feet of developed floor area (including existing uses to be retained within the Crossroads of the World complex), corresponding with a total floor area ratio (FAR) of approximately 4.72:1 averaged out across the Project Site”. DEIR does not give the description of the isolated FAR of the new development from the already existing Crossroads of the World Site.

Necessary Approvals:

1. Page I-18 under Section 8, Necessary Approvals. The project is **not** cohesive with the Hollywood Redevelopment Plan as it doesn’t meet goals (1), (3),(4), (5a), (5h), (5b), (5g), (7g), (9), (10), (11), (12), (13), (14), (15), and (16).

Areas of Controversy:

1. Page I-19 under Section 9, Areas of Controversy, the DEIR fails to account for the financial discrimination this project will bring to the environment.

Alternatives:

Page I-19 under Section 11, Summary of Alternatives. The DEIR does not include other alternatives as a way of fulfilling the intent of the original CRA investment to improve walkability in the area. These other alternatives consist of:

1. That the city invest money in more street furniture, tree planting, improved and consistent street lighting, sidewalk widening, ADA curb cuts, safer crosswalks, public parking lots and grade separated protected bike lanes.
2. That the city install and maintain ADA crosswalks, pedestrian activated crosswalks, parkway tree planting, and zebra stripes at all intersections.

3. That the city repair all broken or damaged city property as a way to encourage even more walkability. This is already a walkable community with a much-used public transportation corridor.
4. The city cease all further “redevelopment projects” and recognize the accomplishment of the “redevelopment” goal as having been achieved.
5. That the current Crossroads World Heritage Site allow for an open gate policy and encourage people to utilize the area instead of discouraging residents from enjoying static activities in the area, as well as walking thru the site.
6. The “Alternative 6” cites an alternative that is not applicable as the proposed Hollywood Community Plan is still in litigation, therefore it would not be a valid alternative.
7. Alternatives 2, 3, 4, 5, and 6 are not consistent with the Hollywood Redevelopment Plan. Either they do not meet the scope or the intent of the Redevelopment Plan. They would then become more development and not for the community to have improved walkability or community benefits that still wouldn't create a financial disparity. Therefore the CRA money could not be allocated to the project.

Hollywood Redevelopment Plan:

This DEIR doesn't conform with the Hollywood Redevelopment Plan goals (1), (3), (4), (5a), (5b), (5g), (5h), (7g), (9), (10), (11), (12), (13), (14), (15), and (16) .

III. 300. REDEVELOPMENT PLAN GOALS

1) Encourage the involvement and participation of residents, business persons, property owners, and community organizations in the redevelopment of the community.

3) Promote a balanced community meeting the needs of the residential, commercial, industrial, arts and entertainment sectors.

4) Support and encourage the development of social services with special consideration given to participating in projects involving community based organizations that serve runaways, the homeless, senior citizens and provide child care services and other social services.

5) Improve the quality of the environment, promote a positive image for Hollywood and provide a safe environment through mechanisms such as:

a) adopting land use standards;

b) promoting architectural and urban design standards including: standards for height, building setback, continuity of street facade, building materials, and compatibility of new construction with existing structures and concealment of mechanical appurtenances;

c) promoting landscape criteria and planting programs to ensure additional green space;

d) encouraging maintenance of the built environment;

e) promoting sign and billboard standards;

f) coordinating the provision of high quality public improvements;

g) promoting rehabilitation and restoration guidelines;

h) integrate public safety concerns into planning efforts.

7) Promote the development of Hollywood Boulevard within the Hollywood commercial core as a unique place which:

a) reflects Hollywood's position as the entertainment center;

- b) provides facilities for tourists;
- c) contains active retail and entertainment uses at the street level;
- d) provides for residential uses;
- e) is pedestrian oriented;
- f) is a focus for the arts, particularly the performing arts; and
- g) *recognizes and reinforces its history and architecture.*

9) Provide housing choices and increase the supply and improve the quality of housing for all income and age groups, especially for persons with low and moderate incomes; and to provide homeownership opportunities and other housing choices which meet the needs of the resident population.

10) Promote the development of sound residential neighborhoods through mechanisms such as land use, density and design standards, public improvements, property rehabilitation, sensitive in-fill housing, *traffic and circulation programming*, development of open spaces and other support services necessary to enable residents to live and work in Hollywood.

11) Recognize, promote and support the retention, restoration and *appropriate reuse of existing buildings*, groupings of buildings and other physical features especially those having significant historic and/or architectural value and ensure that new development is sensitive to these features through land use and development criteria.

12) *Support and encourage a circulation system which will improve the quality of life in Hollywood*, including pedestrian, *automobile, parking* and mass transit systems with an emphasis on *servicing existing facilities and meeting future needs.*

13) Promote and encourage the development of health, education, child and youth care, and senior citizen facilities and programs to enable the development of a community with a variety of lifestyles.

14) Promote and encourage development of recreational and cultural facilities and open spaces necessary to support attractive residential neighborhoods and commercial centers.

15) Promote the development of the varied ethnic communities in Hollywood.

16) To the maximum extent feasible, seek to build replacement housing within the Project Area prior to the destruction or removal of dwelling units which house low and moderate income people. The Agency shall make a good faith effort to relocate displacees within the Project Area unless they choose to relocate elsewhere. Project displacees shall be provided a priority for occupancy in housing which the Agency has facilitated.

This DEIR also doesn't conform with the findings of the settlement between Hollywood Heritage and the standing successor CRA agency in regards to the FAR of the entire project. The project doesn't meet the planning obligations for transportation plans and urban design plans. These plans were mandated to be in effect by today. And to lower density and/or govern detailed urban design PRIOR TO granting any development intensity over the current zoning. This project is within the area covered by the CRA/LA Board of Commissioners settlement agreement in the matter of Hollywood Heritage, Inc. v. CRA/LA (Los Angeles Superior Court No. BS108249. The project falls within the area covered by CRA/LA, a designated local authority of the City of Los Angeles. CRA/LA is the successor for the former Community Redevelopment Agency of the City of Los Angeles.

There is no analysis or data covering how this project complies, or fails to comply, with the terms of this settlement, CRA/LA and City of LA obligations. There is no reference in the Draft EIR to this important settlement. DEIR fails to provide a detailed analysis showing point by point how every salient aspect of this project complies, or does not comply, with the settlement. In a Nov. 23, 2015 letter to Alejandro Huerta, Environmental analysis Section, Department of City Planning, regarding the “Crossroads Hollywood Project” ENV-2015-2016-EIR, Hollywood Heritage Inc. expressed numerous concerns about the quality of the data and the impacts of the project in terms of the City and the CRA fulfilling planning and other obligations.

The EIR fails 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). Specifically the EIR fails to 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. Instead I find that the EIR truncates the cited goals in order to make project appear as though it is conforming to some of the goals of the redevelopment plan. The EIR must provide sufficient factual evidence to meet the standards needed to provide a cogent analysis of these bedrock issues.

Attachment A:

Graphic graphic of projected collapse of Development Parcel A due to seismic activity and liquefaction:

