



Alejandro Huerta <alejandro.huerta@lacity.org>

Response to DEIR for Crossroads Hollywood Project

1 message

Hollywood Heritage <hollywood.heritage1980@gmail.com>

Wed, Jul 26, 2017 at 10:07 AM

To: alejandro.huerta@lacity.org

Cc: Richard Adkins <rikalad@aol.com>, Christy McAvoy <christy@historicrosourcesgroup.com>, Fran Offenhauser <offenhauser@oma-la.com>, John Girodo <jgirodo@gmail.com>

Good morning Mr. Huerta,

Attached please find Hollywood Heritage's response to the DEIR for the Crossroads Hollywood Project. Would it be possible to substitute an updated letter next week as well?

Please let us know if you have any questions or concerns.

Sincerely,

Richard Adkins
President, Hollywood Heritage, Inc.

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

July 26, 2017

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

Re: Environmental Impact Report for Crossroads Hollywood Project (Case No. ENV-2015-2026-EIR)

CC: Los Angeles Conservancy, Los Angeles Office of Historic Resources, Council District 13, Council District 4, and Art Deco Society

Dear Mr. Huerta:

Hollywood Heritage appreciates the opportunity to respond to the DEIR for the Project called Crossroads Hollywood (ENV-2015-2026-EIR, State Clearinghouse No. 2015101073). The Project, as currently outlined in the DEIR, will have major impacts on the historic core of Hollywood, its current residents, businesses, and visitors.

A project of this magnitude has the potential to disrupt the quality of life for residents within the entire western half of the Community Plan Area with increased density and concomitant traffic, an irrevocable decrease in historic resources that tell the story of our community, and an exacerbation of the economic challenges faced by current businesses and property owners trying to revitalize historic Hollywood Boulevard and its environs to provide a richer visitor experience.

The specious use of Crossroads of the World and its rehabilitation as a major "objective" of this project is a screen to obfuscate what is at best a mostly stand-alone mega-development on its western border, one which also damages the integrity of the landmark and degrades its setting. The deep excavation of multiple square blocks is masked by the artificial division into development parcels A-D.

The Project purports to “preserve the historic setting of Crossroads of the World by distributing density, mass, and scale to other portions of the site” when in reality it destroys and re-makes this entire section of the Hollywood historic core from Hollywood High School to Blessed Sacrament.

Without ever disclosing the facts, the project continues a legacy of developers simply asking for entitlements many times over and above those codified in the 1988 Community Plan, the AB 283 zoning, and the Hollywood Redevelopment Plan, all in effect today and relevant to land use discussions. The facts are that this project is asking for entitlements of 1,432,400 sf, which is 855,510 sf EXCEEDS what is allowed by the current land use regulations. When a project asks for 2 ½ times the allowable construction, and then concludes that destruction of historic buildings is significant and unavoidable, the conclusion is *prima facie* false.

The EIR makes a significant error throughout, in suggesting that the City of Los Angeles is the jurisdiction which has the authority to approve this proposed mega-project. On Page 1-18, the “Necessary Approvals” listing says that the City of Los Angeles has the principal responsibility for these entitlement grants; in fact, the discretion and the requirements for findings rests with the Redevelopment Agency to do all of the following: to clear “D” limitations; to perform Site Plan Review; to execute an Owner Participation Agreement; and to make Findings of Consistency with the Redevelopment Plan.

The Redevelopment Agency is not a unit of the City of Los Angeles; for 5 years the City of Los Angeles has refused to take on the responsibilities which the CRA has by law. It is the CRA that has had responsibilities for over 30 years—and continues to have them—for more stringent and detailed reviews prior to the City of Los Angeles approving proposed projects, and for protecting historic buildings. The enormity of the missing information and analyses in the Land Use section for Redevelopment Plan requirements is reason enough to require a Supplemental EIR.

In those 30 years, the CRA has had the fundamental responsibility for identification and protection of historic buildings. The CRA cannot grant development in this geographic area for 3 reasons: #1 the CRA is required at this time by legal settlement to employ the 1993 Hollywood Boulevard Urban Design Plan in its approvals, and that Plan did not allow the Crossroads parcel to be eligible even for 4.5:1 FAR; #2 the CRA has failed to track traffic counts annually as required by the Redevelopment Plan, and to ensure infrastructure sufficient to support this proposed development; and #3 the CRA cannot use its discretion to grant density in excess of 4.5:1 due to its failure to calculate current Regional Center density to date.

In addition, a project of this magnitude flies in the face of stated goals of the current draft Community Plan now under public review. The City of Los Angeles has put forward a plan for growth in Hollywood, which is now undergoing public review and comment. Hollywood Heritage has been part of these discussions for over five years. The draft plan has been released without its accompanying environmental review. That Plan ostensibly will evaluate the planning and infrastructure needed area-wide for a sustainable and operational future, rather than allowing this Crossroads project “before the fact” which shows adverse impacts and only aims at limiting adversity, not promoting planning health. The Community Plan

should be fully vetted and in place before discussion of this project should ensue, or the plans now in place should be scrupulously followed, with a Project of only 1/3 the size.

About Hollywood Heritage

Hollywood Heritage is a non-profit organization dedicated to preservation of the historic built environment in Hollywood and to education about the early film industry and the role its pioneers played in shaping Hollywood's history. Our mission is not just the protection of individual "landmark" buildings but of the collection of historic resources as a whole, preserving patterns of connectivity that tell the story of Hollywood's historic development, the "setting". This includes preserving structures from each period of development so that historic patterns can be perceived physically. Hollywood Heritage does not oppose growth, but believes that the majority of sites in the historic core (mostly now identified in land use designations as "regional center") should be developed to be compatible "infill" which should support, not further compromise, the Hollywood that attracts millions of visitors a year with its historic "sense of place."

In support of our mission and with a view to creating a livable historic Hollywood, we offer the following comments:

1. The Project Description articulates a vastly different vision for Hollywood, with particular adverse impacts on historic preservation, neighborhood and commercial character, and existing affordable housing.

Crossroads Hollywood consists of 29 parcels in the area of Sunset, Las Palmas, Selma, and Highland, but does not include all the parcels in this area. While Hollywood Heritage understands that all development depends on site control, a project of this magnitude has been gerrymandered to make maximum use of select parcels while ignoring the better planning approach of utilizing all the parcels immediately adjacent, particularly those at the northeast corner of Sunset and Highland and extending along the northern streetscape of Sunset. It proposes to “redevelop the project site with a mixed use development that retains and integrates the historic Crossroads of the World within a collection of new buildings of contemporary design and creates an open-air pedestrian district with a mix of shopping, dining, and entertainment uses. It includes eight new mixed use buildings ranging from 1 to 32 stories (maximum 402’).” (The project does not actually “retain” Crossroad of the World in its existing designated configuration. This part of the description is misleading.)

Heights and intensity of uses proposed are more than eight times the current square footage of floor area. Height and density have a significant impact on the historic setting of the Crossroads of the World complex. Thirty and thirty-two floor towers are located a mere 200 feet from Crossroads. These towers dwarf Crossroads and other adjacent off-site historic structures.

The project is to “transform a series of underutilized parcels into an integrated, high-density, mixed-use, transit-and pedestrian-oriented development that provides an active residential, shopping, dining, entertainment, and working community while also retaining and revitalizing the historic Crossroads of the World complex.” To that self-serving end, the Project’s specific objectives have been developed.

Hollywood Heritage has underlined pertinent phrases of each objective and disputes that this project meets the objectives, since the spirit and substance of the majority can be achieved through better planning with a less dense project more respectful to the existing environment.

- “To construct a high density, mixed-used development consistent with the uses and density envisioned for the Regional Center with sustainable urban planning principles, particularly given the abundance of available public transit options near the Project Site”: The Project Site and immediately adjacent parcels can sustain more density through appropriate infill planning. “Sustainable urban planning principles” include retention of historic and “character” buildings to minimize construction waste. The most “sustainable” project is one that maximizes existing resources, repurposing or maximizing their use through rehabilitation. (See Comments #6 and #7). As noted previously, this high density has never been envisioned for this part of the Regional Center.
- “To retain and revitalize Crossroads of the World”: This phrase is misleading, and seems to be used as a justification for the extreme densification of the entire remaining Project. The Project proposes new construction on the Crossroads site which will impact the historical configuration and setting as well as create new intrusion onto what is an entire square block of the historic core.

- “To create an open-air pedestrian district”: Such a district exists today. It is the historic street grid which connects Hollywood Boulevard and Sunset via Las Palmas, Selma, McCadden, and Highland. A new diagonal private path of travel will detract from exploring historic sites on Selma and Las Palmas, from bringing economic vitality up side streets into Hollywood Boulevard, and leave no reason to improve and enhance McCadden as a connection to the Musician’s Institute or other historic venues on Hollywood Boulevard. This is a proposal to invest vast resources in abandoning and turning our collective back on our existing streets and investments. Better and safer in the planning scheme to enhance pedestrian experience of existing streets.
- “To develop a high-rise upscale hotel immediately adjacent to areas of high pedestrian activities, particularly along Hollywood Boulevard and Sunset Boulevard”: Hollywood is overwhelmed with hotel proposals. The City must stop un-considered “boosterism” for anything big and new, and seriously conduct an economic and marketing study evaluating all hotel proposals and determine which sites, price points, and amenities are needed to service the entire population of tourists. Three new hotels are scheduled to open this summer within blocks of the site and at least 13 more are planned. Is a high-rise hotel, with its additional liquor licenses, traffic, and a front door on Highland the best use of a parcel across the street from historic Hollywood High School?
- “To create a pedestrian-friendly identity for the Project Site with active commercial uses along street frontages”: Active commercial uses are needed on the existing streets, but should be compatible with new and existing housing added to the area.
- “To provide different types of new housing units”: Different types of new housing units make for a diverse community. The Project is heavily weighted to types that upper income residents prefer. A better mix, with emphases on affordable and working class housing needed by creatives, teachers, families, and service workers should be studied in conjunction with retention of existing housing.
- “To locate a high-density residential and commercial mixed-use development in a transit priority area and adjacent to major transportation lines”: This is one of the basic discussions of the community as it assesses the Community Plan and its implementation. This shop- worn phrase may have outlived its usefulness as a panacea to all of Hollywood’s issues. The 1988 Community Plan already identified the transit locations and thoroughly planned for them in the land use regulations adopted at that time. No single piece of evidence has been put forth to show that a 3-fold increase in that amount of construction on these parcels is anything more than the developer’s whim, and an exercise in lopsided development and a loss of market share to all other property owners. The adverse effect on historic resources is documented in this EIR. Discussion of how to maximize transit is key, but needs to be done in the context of genuine area-wide planning and survival of the historic resources that create the attraction.
- “To provide new restricted affordable housing units”: Hollywood Heritage encourages affordable housing in Hollywood, as it is a big part of its historic legacy of worker housing near studios and commercial retail. First and foremost, historic housing

should be retained and rehabilitated, which is not a part of this proposal. Compatible infill housing is encouraged.

- “To create multimodal transit options for Projects users by providing ample bicycle parking”: Multi-modal transit options are encouraged for all residents to better explore our historical community. Any project in Hollywood should have this as a component, but to give it the weight of a project objective is overreaching and an attempt to detract from traffic impacts.

2. The Project appears to contravene the goals of the draft 2017 Hollywood Community Plan with regard to historic preservation, especially its new Chapter 5. The Project is not consistent with the Redevelopment Plan and requests removal of the zoning “D” condition with no adequate Justification or credible re-planning. While relying on compliance with “goals”, the DEIR is grossly misleading even in the achievement of goals. The Land Use Section of the DEIR fails to analyze the actual quantities of development allowed in the codes and plans that actually have jurisdiction. The Land Use Section cherry-picks goals and plans to analyze, yet leaves out a number of the most pertinent Plans which have actual jurisdiction.

The DEIR includes statements about the existing plan which acknowledge that the Applicant is somewhat aware of policies regarding protection of historic resources, neighborhoods, and housing.

- “The Hollywood Community Plan does not specifically address historic resources; however, a stated objective of the Hollywood Community Plan is to ‘encourage the protection and enhancement of the varied and distinctive residential character of the Community’.” The Housing Policy in the Hollywood Community Plan “encourages the preservation and enhancement of well-defined residential neighborhoods in Hollywood through Historic Preservation Overlay Zones and preparation of neighborhood preservation plans tailored to development standards that are compatible with neighborhood character.”
- The DEIR also states, incorrectly, that “Some land use controls have been transferred to the City of Los Angeles Department of City Planning, including those for the Hollywood Redevelopment Plan” and “The Redevelopment Project’s goals include 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.” In point of fact, land use controls and responsibilities still reside with the Community Redevelopment Agency, including making findings of conformance with the Redevelopment Plan. The necessary approvals for the Project show that the Agency must make findings regarding zone and height district changes to replace the “D” conditions in effect; do Site Plan Review; craft an Owner Participation Agreement and make Finding of Consistency with the Redevelopment Plan. These are major steps in the approval process. The Redevelopment Agency is not a part of the City of Los Angeles and all land use and jurisdictional issues have not been transferred over to City Planning.

City approvals, including vesting conditional use permits to approve floor area ratio averaging, the vesting tract map to allow street vacation and subsurface vacation, the Master CUP and other permits and agreements have major impacts and should not be granted without a much more robust discussion of community benefits, mitigations and project implementation. While the developer makes grand statements about “rights” to 4.5:1 FAR, in point of fact the City does not have those rights, and would be gifting 855,000 square feet of free entitlement if it allows this density.

The Redevelopment Plan and the Community Plan in force today state that it is the preservation of historic buildings that is the fundamental determinant in such a case for

“community benefit”, and that the Transfer of Development Rights off the historic parcels owned by this developer would be the first requirement to document community benefit. The DEIR fails to clearly state the allowable development as planned for in Plans and legislated by current zoning, as well as why a “D” condition currently exists (to curb development occurring in advance of infrastructure upgrading). Only when these conditions are clearly stated and then contrasted with the request will the DEIR be adequate.

The above statements in the DEIR appear to be rehashes of previous versions of the draft Community Plan, failing to cite or follow the goals in the new draft Community Plan, especially with its chapter on Preservation.

- Wholesale scraping of existing resources and over-scaled development does not support the newly promulgated Community Plan goals or the 1988 Plan goals.
- The proposed FAR is 4.72:1, averaged across the site. Look at the diagrams in Section 2, which show the impact of that amount of density. Averaging and wholesale demolition clearly violates the goals of the Community Plan and the Redevelopment Plan. CRA regulations require losing entitlements when identified historic resources are demolished. CRA regulations require rehabilitation in accordance with the Secretary of the Interior Standards. Excerpts from the 2017 version of the Community Plan indicate an acceptance of the “D” Conditions for the area around the historic core of Hollywood. The 2017 document says: “The Plan establishes new lower height limits around historic districts and integrates development into existing scale.” These aren’t new—they are existing requirements which must be followed, and are not followed by this proposal. Note that the Project is ringed with identified historic structures and districts. Historic parts of Sunset are linked with historic Hollywood Boulevard by the historic streets of Las Palmas, McCadden, and Highland. Although 2017 Community Plan may not be entirely ideal for preservation, it reflects 30 years of planning for the area for historic resources in the environs of the Crossroads project. The current Redevelopment Plan 1993 Urban Design Plan achieved this goal. The proposed Project does not.
- “The Plan promotes streetscape plans and new street standards indicating a desire to strengthen our historic streets and provide pedestrian amenities.” See below (Comment #5) for further discussion.
- “The Plan expands Historic Preservation Districts and preservation tools, including linking incentives to preservation goals.”
- “The Plan promotes the regulation of scale and design in the heart of Hollywood through a Hollywood Specific Plan or Community Plan Implementation Overlay Zone.” This project lies within the proposed CPI O and should be subject to its principles. While procedures for the CP10 are being codified, this Project should not be approved as significant impacts maybe left unaddressed.
- “The Plan establishes urban design guidelines for new development in Hollywood, reinforcing the pedestrian friendly character of commercial districts.” How does the Project meet this goal? Does it conform to the draft urban design guidelines for Hollywood and Sunset corridors?

The DEIR should include an analysis of the ways in which the Project conforms to the current Plan goals, regarding preservation in the Community Plan, including Chapter 5.

The DEIR acknowledges the history of historic surveys in Hollywood, including acknowledgement of Hollywood's efforts to inventory its historic resources. Such efforts began in 1978, when the area including this portion of the historic core was surveyed by the Hollywood Revitalization Committee, formed by Council District 13. The survey was funded in part by the California Office of Historic Preservation. Subsequent efforts were conducted in 1984, 1997, 2003 and 2010 by the CRA as part of its ongoing land use management efforts. The 2010 (Chattel) survey was still under review when the Agency was dissolved. As part of a lawsuit settlement, Hollywood Heritage continues to provide comments on the survey and is monitoring its incorporation into Survey LA.

Identified resources on the Crossroads Project are set to be demolished, including several in increasingly threatened periods of development. The purpose of the surveys was to identify and protect (through planning) significant resources. The Project's cavalier treatment of these resources fails to meet goals of virtually any and all plans and regulations in effect and to date. And the conclusion of "unavoidable" significant adverse effect is false

3. The Project proposed to demolish more historic resources than any other since the inception of the Hollywood Redevelopment Area, including historic buildings used for affordable and work force housing. The adverse effect is avoidable.

The project demolishes all existing buildings on the site, including a 1907 one story vernacular at 1547-49 McCadden, three two- story 1939 Regency Revival courtyard apartments (6700 Selma, 1535-55 Las Palmas), a 1910 Craftsman at 1542 McCadden, a two story commercial block at 6683 Sunset (1923), a two story Craftsman at 1606-08 Las Palmas (1912), and the Hollywood Reporter Building at 6713 Sunset.

- The 1907, 1910, and 1912 structures are among the oldest in Hollywood, and this population has been disappearing at a rapid rate throughout the former CRA area and in other parts of the Community Plan area over the past five years.
- Commercial blocks from the 1920s, which give the major boulevards their character, are similarly at risk, as are the collection of prewar apartments that serviced the Golden Age of Hollywood in the 20s, 30s, and 40s.
- The Reporter has been nominated for Historic Cultural Monument status by the Art Deco Society (supported by HH and LAC) and is under review. It is one of only three significant sites related to the Hollywood press that showcased the industry in its heyday.

The project demolishes prime examples of several periods of significance in the Hollywood core, something no single project has managed in the last decade. These resources have been repeatedly inventoried and found to be significant.

In addition to the demolition of resources on the Project site, an acknowledged significant impact unable to be mitigated, the Project impacts many other historic resources by changing the historic setting of Hollywood.

- This is not just about individual buildings, but the aggregate collection. This quadrant of the core contains many prominent structures: the Hollywood Athletic Club, YMCA, Citizen News, Baptist Church, Blessed Sacrament, Egyptian Theatre and other buildings in the Hollywood Boulevard District, and Hollywood High School.
- The project repeatedly states that “the existing setting is not critical to understanding the building’s significance; significance is conveyed primarily through their plan, massing, spatial configuration, architecture and design.” That can on occasion be true when assessing individual structures, but when talking about historic community character, it is not.
- This project fails to provide compatible infill to enhance the setting of historic structures; instead it overwhelms and isolates them from one another further. The story of Hollywood is told in the built environment not just by individual landmarks but by the components which bind them together: the variety of types (institutional, commercial, residential), the diverse architectural styles associated with those types from different development periods, the street grid which creates commercial thoroughfares connected by the north-south streets; the relationship to the hills and views to and from them. (See Exhibit X, Hollywood Heritage map)

The Project proposes the demolition of multiple separate historically significant structures and the relocation of one structure. This can be avoided with proper planning.

- For instance, why not relocate 1606 Las Palmas north of the Redwine Building?

- The loss of the Hollywood Reporter building and other significant properties on the Project site are in no way mitigated by a requirement for recordation.
- Hollywood Heritage maintains survey files from 1978 to the present. Since our Settlement Agreement with CRA went into effect in 2009, we have documented well over 100 demolitions of historic resources and older “character” buildings in the CRA area, with dozens more in the neighborhoods of the Community Plan. Many of these are from the pivotal years of Hollywood’s growth (1900-1920) as the movie industry arrived and the need for housing and commerce increased.
- The cumulative impacts of the loss of these types of resources is a requirement of CEQA before this Project is allowed to proceed in order to provide decision-makers with a clear picture of the Project’s additional impacts. The objective is not to document the past, although Hollywood Heritage is grateful for the mitigation measures which delineate a basically thorough process. The goal, however, should be to cause less destruction, acknowledging historic preservation as an important community value and benefit.

Further EIR analysis required: While the discussion of cultural resources is basically sound, Hollywood Heritage would like further analysis on the group of six resources from the 1950s/60s. The Chattel survey did not identify a large number of these in the core. What is their role in the context of Hollywood in the postwar period? Are other examples located in the historic core? As to the three duplexes from the 1920s, how many of their property type remain in the core? If there are few examples, should they be re-evaluated despite their alternations? Duplexes and fourplexes as a typology have been identified in the 2010 CRA survey and in Survey LA as an important component of Hollywood multi-family housing.

The Project demolishes existing “affordable” housing. 84 units of housing in historic buildings will be demolished. It will be replaced at some point and somewhat increased, but the size of the development warrants much more affordable housing than proposed. Hollywood Heritage has always believed that historic buildings should house a range of economic situations, as they did when they were built. There is no need to turn people out of historic buildings that continue to provide shelter. In fact, the most “sustainable” way to create housing is to use what is already there. Will the buildings need rehabilitation? Yes, but there should be different kinds of housing at all economic levels in a project of this magnitude. It is a community benefit to rehab existing housing stock. Many value the “sense of place” provided by older buildings. This Project should incorporate existing buildings into its desire for a “new neighborhood”. Scorched earth planning from the 1960s has been rejected by all of the most vibrant cities in the country. Hollywood deserves a better approach. Saying they are replacing existing rent control housing with their housing is untrue.

Further effect: Therefore, the Project has far ranging cumulative effects on the historic core: in the numbers of historic resources retained, degradation of the historic setting, existing historic affordable housing and the potential to alter economics and viability of the remaining historic buildings in the Hollywood Boulevard District and along Sunset. (See also Comment #7).

4. The Project has adverse impacts to the historic Crossroads complex. A landmark of this caliber should not be subjected to a diminution of its integrity through relocation of contributing buildings, incompatible new construction, or disturbance of the existing setting.

The DEIR states about the landmark Crossroads complex: "Designation recognizes the unique architectural value of certain structures and helps to protect their distinctive qualities." Unfortunately, this is untrue. The historic designations of Crossroads of the World, both at the national, state, and local levels, has not protected Crossroads from being "enhanced" incompatibly by new construction, and from having its existing configuration altered to make room for such construction.

- While the complex is not being demolished, it is being altered. One building is being reoriented and relocated. New construction is being added. While Hollywood Heritage acknowledges that this may not cause Crossroads to lose its National Register or Cultural Heritage designations, it does diminish the integrity of a significant designated landmark. There is every indication that moving these parts around will result in a false sense of history on the site, even with the mitigation/interpretations proposed. The setting will be irrevocably changed by altering the street grid, excavation, and the addition of substantial new construction.
- Review of documents at the time of Crossroads construction acknowledges its "T-shaped" configuration, designed with surface parking and thoughtfully landscaped to fit on a block with existing commercial and prominent institutional structures.
- Relocation of the Early American Building would alter the original plan and configuration of the Crossroads of the World property by relocating one of its nine component buildings. This relocation will destroy spatial relationships that characterize the property. Mitigation Measures D-2 and D-5 would not reduce the impact of the relocation of the Early American Building to a less-than significant level. Changing the alignment of Las Palmas will adversely impact Crossroads' historical integrity.
- The construction of Buildings C1, C2, and C3 cause changes to the setting of this historic block (including Crossroads) which are incompatible and divide an historic setting. Underground construction is risky on historic sites, and Hollywood has had examples of this (Metro construction along Hollywood Boulevard) where even careful planning did not avert damage. Why risk Crossroads, Blessed Sacrament, First Baptist Church and the 1923 commercial block? If the Project is scaled back, is the parking for 1,000+ cars necessary?

While the applicant made progress from earlier designs shared with Hollywood Heritage, this version of the Project gives a false impression of preservation, but deserves much more accurate analysis and improvement. Given the disregard for Crossroads as a landmark, it is insulting to name the Project after it, as if the project protects and saves historic resources. Adverse potential effects from new construction, excavation, and street realignment can diminish the integrity irrevocably, and should be fully addressed in the FEIR. Even if the Secretary of the Interior's Standards are successfully followed for the Crossroads complex itself, the incompatibility of the new project with its setting is significant. **The Project alters**

the historic street grid, a character-defining feature of the historic core, and affects traffic adversely on a historically important residential street

There are clues to history everywhere, and one of them lies in the street patterns of cities. In Hollywood, many of these street patterns have to do with previous land ownership dating back to the days when the core was a series of small “ranches”. Streets not in alignment reflect these patterns of ownership. The Las Palmas offset has existed for over a hundred years. The core was developed with churches and schools and businesses around that anomaly. The project’s odd desire for a through-block diagonal and underground parking is driving this change. It puts unacceptable pressure on the historic environment and buildings along the grid.

The realignment of Las Palmas and the proposed diagonal linking the “improved” Crossroads of the World to Highland creates a condition which detracts from historic transportation patterns with their emphasis on true- east-west and north-south connections. Las Palmas is still part of a grid system, even if it requires a series of turns. Its views to Hollywood Boulevard and Sunset and the relationship of buildings to the street should not be altered. Instead, enhance pedestrian amenities along existing streets to enhance the historic experience of Hollywood.

The FEIR should reflect that this proposed through-block diagonal is a significant adverse effect. It divides a community by abandoning its existing streets, concentrating traffic at poor locations, and creating a privately owned and controlled substitute for the public domain.

The FEIR should reflect the traffic-inducing damaging effect of the proposed realignment of Las Palmas Avenue and the damaging effect on the existing residential neighborhood south of Sunset Blvd.

5. The Project creates severe and irreversible cumulative impacts to adjacent historic resources by dramatically altering the setting of this section of the Hollywood historic core, including churches and schools.

The Project is located in the heart of Hollywood’s historic core. It is surrounded by historic resources and districts (see Figure 1 at end of document). In addition to overwhelming these resources visually, the Project will limit their ability to function. Some will be impacted economically as patrons are diverted from businesses in existing buildings on Sunset and in the Hollywood Boulevard District. The Project will most certainly impact the ability of Blessed Sacrament and First Baptist to provide services, and to Hollywood High Schools and Selma Avenue Elementary School in providing a safe and tranquil educational environment. The cumulative effect on these quality of life issues and the viability of functions in these historic places needs to be addressed.

The DEIR does not address impacts on the two schools, church, or on the Egyptian Theatre, be it light/noise/traffic/views/construction issues/safety, etc. Construction and all the building if they happen, will have major impacts on the operation of the schools and theatre and safety of all the patrons and students. Extra cars and the through-block diagonal will put students at risk. Where will parents park or be able to pick up children? Where will people park to go the Egyptian Theater? The high school will lose views, light, and safety, and have concerns because of the increased traffic and lack of parking, noise, alcohol, street, views, light and safety. Where will people park for the two churches, how will noise affect services, how will traffic people getting to services, weddings, funerals, loss of views, safety, and like? The FEIR should include a cumulative impact analysis on the Hollywood community.

6. The Project does not reuse existing buildings, the best form of “green buildings” and sustainability

Environmental sustainability and preservation of historic resources are complimentary. It is not just nostalgia that draws people to historic buildings. Much of what is valued about these structures is their response to the climate, natural setting, and locally-available building materials; their usefulness as models for new buildings adds to their value. Older buildings are non-renewable resources—creatively reusing them is a form of recycling.

Architect Carl Elefante coined the phrase, “The greenest building is the one that already exists,” to convey the environmental benefits of retaining and recycling existing buildings. In 2011, the Preservation Green Lab released a report that confirmed the wisdom behind Elefante’s words. “The Greenest Building: Quantifying the Environmental Value of Building Reuse” provides the most comprehensive analysis to date of the environmental impact reductions associated with building reuse.

The results of this analysis show that it takes “from ten to 80 years for a new building that is 30% more efficient than an average-performing, existing building to overcome, through efficient operations, the negative climate change impacts related to the construction process” (Preservation Green Lab, 2011, p. viii).

“The Greenest Building” report substantiates the idea that recycling, repurposing, and retrofitting existing buildings to make them more energy efficient is an effective sustainable development strategy. For this reason, the high level of new construction proposed by the

Crossroads Project will almost definitely have a direct and negative environmental impact. As a result, alternative forms of development that incorporate existing structures instead of replacing them should be pursued.

The FEIR should provide an analysis of demolition and construction waste and identify environmentally superior alternatives to this waste.

7. The Project does not identify Alternative 5 as the environmentally superior alternative. In addition, it uses the specious argument that project would not include rehabilitation. This is a false dichotomy of choice. In a project of this magnitude, there is substantial room for rehabilitation of important landmarks. The Applicant has specifically constructed the proposed alternatives to fail by providing Faustian choices and then basing evaluations on them.

The City of Los Angeles must correct the falsehoods of the alternatives analyses in the FEIR. Alternatives 4 and 5 provide vital information to the public, identifying existing land use density and historic resources. This is the one place with the beginnings of accurate information on land use in this area of the Hollywood Core, with the opportunity to then illustrate methods of compatible development. The DEIR has provided the information, but falsely analyzed it. The FEIR must correct the logic.

- The perverse and unacceptable logic in the evaluation that Alternative 5 (The Preservation Alternative!) would have a greater impact on “adjacent new construction to historic resources since a greater number of historic resources would be potentially impacted by underground excavation and construction in all four development parcels;” is false, and intentionally deceptive. CEQA is and has always been crystal clear that demolition is the highest adverse impact on any scale regarding historic resources.
- Alternative 5 “falls short of proposed project’s objectives” because it preserves historic uses without rehabilitation. Again, this is a falsehood. The Secretary of the Interior Standards do not require rehabilitation or restoration—they guide the process of proposed work, but do not require the work. Demolition and incompatible new construction and alteration of the historic setting are clearly substantially more adverse.

The project's consistency with City plans is analyzed falsely. In reviewing the alternatives analysis, there are cherry-picked objectives that are used to evaluate the alternatives, and even those are inconsistent with those plans. For instance, how can the goal "To develop a high-rise upscale hotel as part of an open-air pedestrian district located immediately adjacent to areas of high pedestrian activities, particularly along Hollywood Boulevard and Sunset Boulevard", which is not a goal of any Plan, be judged to be a more desirable outcome than stated goals of all the applicable Plans? An objective to "create a pedestrian-friendly identity for the Project Site by introducing active commercial uses along street frontages", is not met when the project takes activity off of main thoroughfares (Sunset and Highland) and directs it to a (private?) internal paseo. The FEIR must be thoroughly revised, and analyze alternatives using factual information, not false claims.

A more robust and CEQA-compliant Alternatives section in the FEIR must include either as part of truly meaningful alternatives or individually:

- 1) Other sites: A project of this magnitude should involve analysis of other adjoining and adjacent sites, particularly those on the south side of Sunset and at the northeast corner of Sunset and Highland, including parcels on Sunset to the Project boundary. Use of the historic survey to identify parcels with fewer impacts on historic resources and the setting is desirable to give an adequate picture of where historic resources are located. See Figure 1 for a mapping of resources surrounding the Crossroads of the World

historic resource. This map is based on CRA/SurveyLA survey results and is used for illustrative purposes. Sites not mapped cannot be presumed to be without historic significance.

- 2) Consider relocating 1606 Las Palmas further north to avoid demolition.
- 3) Hollywood Heritage recommends not building on Parcel C or realigning Las Palmas, thereby creating a true buffer between all of the historic resources on Parcel C and the rest of the square block and new construction. This avoids substantial excavation, better preserves the setting of Crossroads, First Baptist, and Blessed Sacrament; and will preserve the integrity of Crossroads. The applicant's commitment to a Standards compliant rehabilitation for Crossroads should be included.

Alternative 5 (with rehabilitation) is clearly the environmentally superior alternative offered and should be adopted as such in the FEIR. Hollywood Heritage encourages the City to work with the Applicant to define a project which incorporates Alternatives 4 and 5, thereby eliminating substantial impacts and aligning factually with longstanding City policy.

Summary

From Hollywood Heritage's perspective, the "big picture" of community planning in Hollywood has been pushed aside for the gain of one Applicant.

Environmentally superior alternative: The project has avoidable and unable to be mitigated significant adverse impacts. Although largely preserving Crossroads itself, the project proposes to demolish an unprecedented number of identified historic resources. This demolition avoidable through the adoption of Alternative #5, which is environmentally superior. Alternative 5 preserves all of the historic landmarks on the site. It was erroneously dismissed as not meeting objectives, and because rehabilitation of Crossroads was consciously not included. The analysis is factually inaccurate and intentionally misleading, and must be corrected in the FEIR.

Inadequate evaluation of historic impacts: Unmitigated adverse effects are recognized and discussed nationwide such as the adverse effect of this project on an historic district and adjoining landmarks. The new building size of this project is incompatible with the Hollywood Boulevard Commercial and Entertainment Historic District. Hollywood Heritage reserves the right to submit a more detailed analysis of this adverse effect, especially in light of the current inadequacy of the LA CEQA Thresholds Manual on this subject.

Discretionary approvals required from CRA, with accurate findings which cannot be made: Entitlements requested for this project must be requested from the CRA; the CRA should require a use of Transfer of Development Rights to transfer all development potential off all historic buildings. The Redevelopment Plan clearly sets up a public benefit process to allow increases in density IN EXCHANGE for the public benefit of preservation—preserve building and transfer their unused development rights. The Community Plan clearly references this process. In a case where a developer owns the buildings and wants the increase—there is no excuse to not use this tool.

Comments from our members indicate that the public wants to be engaged. In addition to historic preservation concerns, our members are residents of Hollywood and believe strongly that historic assets should not just be preserved—the goal is to promote future economic viability and future life. The viability should not be sacrificed for new construction. Some of their comments include:

- "Cultural Properties should not be affected or touched, like the Early American building at Crossroads, the 1910s houses, and the Reporter building/warehouse. The HR building shows the rise of Hollywood and the entertainment industry, link to major entertainment figure, famous architect, and place of social/cultural significance, so definitely should not be touched. Why is there mitigation at Crossroads but nowhere else?"
- "It does not address impacts on the two schools, church or on the Egyptian Theatre, be it light/noise/traffic/views/construction issues/safety, etc. "
- "Construction and all the buildings if they happen, will have major impacts on the operation of the schools and theatre and safety of all the patrons and students. Extra cars and that strange crossroad path will put students at risk. Where will parents

park or be able to pick up children if all this goes up? Where will people park to go to the Egyptian? The high school will lose views, light, and safety, and have concerns because of increased traffic, noise, alcohol, and the like. The elementary school has concerns because of the increased traffic and lack of parking, noise, alcohol, street, views, light, and safety. We don't need light pollution from billboards day or night and we don't need Times Square in Hollywood. Where will people park for the two churches, how will noise affect services, how will traffic affect people getting to services, weddings, funerals, loss of views, safety, and the like. We know construction will be bad for the churches, how can they ensure they won't suffer major damage, or the Redwine Building? They claim it will be mitigated, but something that big with so much shaking, underground construction, and the like caused major problems when the subway was being constructed in Hollywood.”

- “Alcohol at the hotel is bad with a high school across the street and an elementary school nearby.”
- “Last but not least, we live in a desert, where water has had to be piped into since 1913. We just came out of a drought. Where is all the water for all these people supposed to come from, and how will it not explode the 1910s-1920s water pipes all over Hollywood, much less the sewer pipes the same age? We could be in a flex alert to cut back on power usage on Thursday because of the heat, where is all the extra power going to come from for all these people?”

Hollywood Heritage objects to the approval and entitlement of a project which does the following, and expects to see an FEIR which factually addresses these issues, evaluates the effects accurately, and identifies the environmentally superior approach:

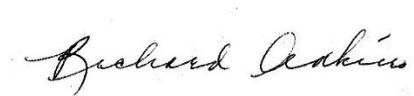
- 1) Demolishes a large amount of historic affordable housing
- 2) Demolishes identified significant historic commercial structures
- 3) Impacts and erodes the integrity of the Crossroads landmark, even with mitigation
- 4) Realigns the historic street grid with resulting damage to historic neighborhoods
- 5) Fails to conform to stated preservation requirements in the Community Plan and the Hollywood Redevelopment Plan
- 6) Does not address “sustainability” in incorporating historical structures into project planning and avoiding significant and long-lasting demolition waste
- 7) Underestimates traffic, effects on economic viability of existing districts, and construction impacts
- 8) Correctly identifies demolition as significant and unable to be mitigated but does not accept the alternative which avoids the impact. Identifies underground excavation and general construction as “less than significant with mitigation”, putting numerous historic structures at risk 10. Fails to disclose that it fails to meet the requirements of the Redevelopment Plan to provide documented justification and community benefit for an outsized increase in density. The project takes 855,000 square feet of development— development for which there hopefully is some kind of ascertained market—and takes that market and economic opportunity away from area property owners. At 2:1 FAR—the actual allowed development intensity of these properties-- that is equivalent to purchasing 427,500 square feet of land from other owners. At \$300/square foot, that is equivalent of taking \$128 million of value from others, and offering nothing in

return—instead demolishing a precinct of remaining historic buildings and erasing property rights of others and heritage.

11. Fails to fund needed infrastructure in advance of development, as required by the 1988 Community Plan and Redevelopment Plan.

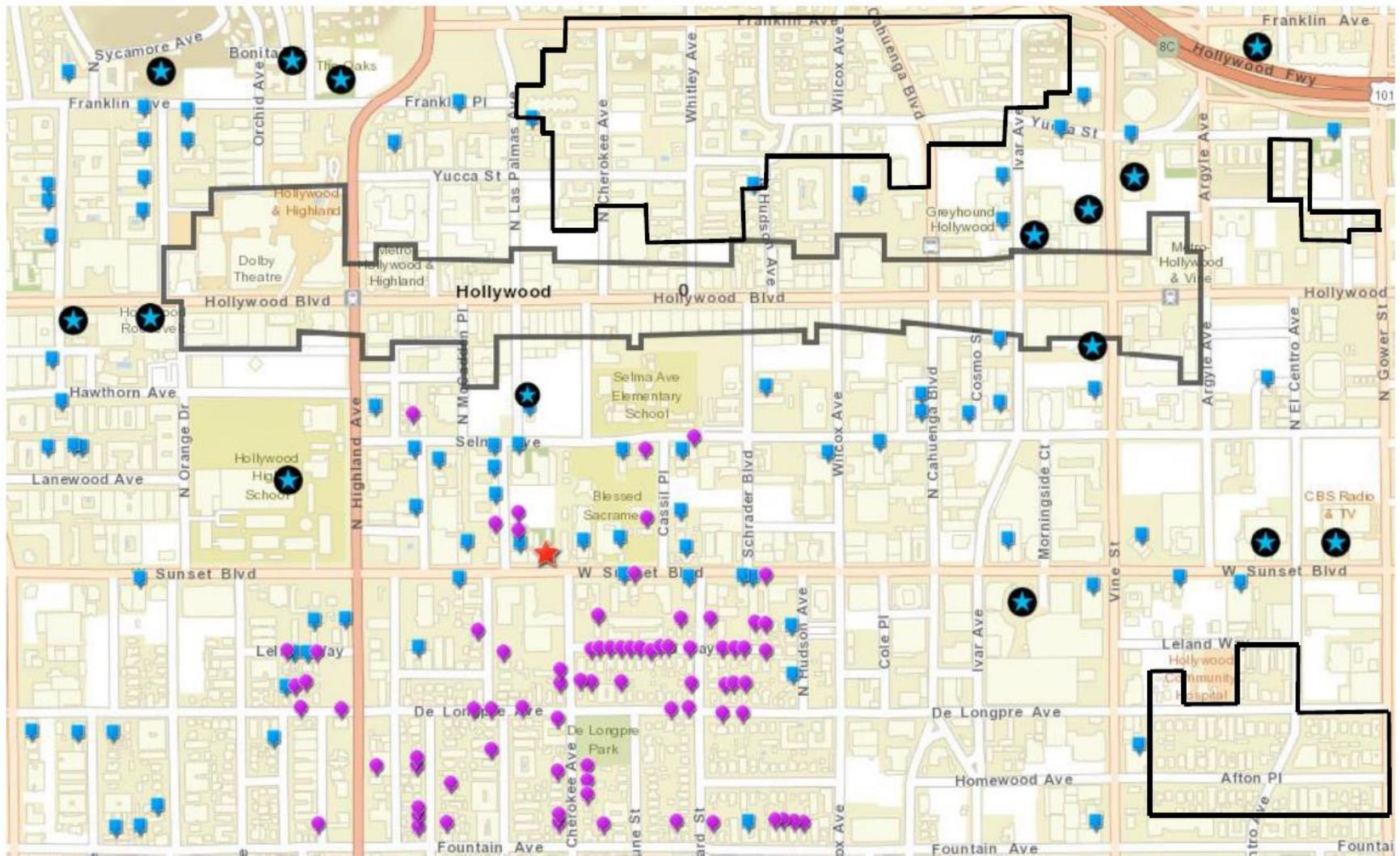
We look forward to an FEIR which departs from the standard defense of an inaccurate DEIR and factually and honestly evaluates these issues. In light of the special dispensation from the Governor, our City must insure that decision makers and the public have accurate information.

Sincerely,

A handwritten signature in cursive script that reads "Richard Adkins".

Richard Adkins
President, Hollywood Heritage, Inc.

Figure 1



Note: Red star represents Crossroads of the World resource. Gray border represents National Register District (Hollywood Boulevard). Black borders represent CRA-recognized historic districts (Multifamily Housing, Afton Square, and Vista Del Mar/Carlos). Black circles with blue stars represent National Register or California register historic resources. Blue squares represent “2” – “3S” CRA-graded resources. Purple circles represent “6DQ”/“6Q” CRA-graded resources. This map is based on CRA/SurveyLA results and is used for illustrative purposes. Sites not mapped cannot be presumed to be without historical significance.