



Alejandro Huerta <alejandro.huerta@lacity.org>

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## ENV-2015-2026-EIR, SCH# 2015101073 Comments of DEIR CrossRoads-Hollywood

1 message

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**Tom Williams** <ctwilliams2012@yahoo.com>

Wed, Jul 26, 2017 at 1:07 PM

Reply-To: Tom Williams <ctwilliams2012@yahoo.com>

To: "alejandro.huerta@lacity.org" <alejandro.huerta@lacity.org>

Cc: Jill Stewart <jilltepleystewart@gmail.com>, Hunter Photography <heysuzhunter@gmail.com>, Kathleen Whitaker <kathleenwhitaker003@gmail.com>

DATE: July 26, 2017

TO Alejandro A. Heurta, Env.Revw.Coordintr., Major Projects & Env. Analysis  
Dept. City Planning, City Hall, Rm.750 Los Angeles, CA  
[alejandro.huerta@lacity.org](mailto:alejandro.huerta@lacity.org)

CC:

FROM: Dr. Tom Williams, Senior Technical Adviser  
Citizens Coalition for A Safe Community, LA, Ca 90032-1712

SUBJECT: Crossroads Hollywood Draft Environmental Impact Report, DEIR  
ENV-2015-2026-EIR, SCH# [2015101073](#)

RE: Comments on DEIR

The DEIR for the Crossroads Hollywood Project, including many appendices is voluminous, but does not readily meet the publicly accessibility requirements and various sections are incomplete and inadequate and require withdrawal, revision, and recirculation. The online pdf version of the DEIR cannot be copied for improved comments and many could be digitally searched while other City CEQA documents can be searched and copied. Many footnoted and text/appendices references are not available to the Public online or in hard copy through the City; therefore, the deficiency renders the DEIR as inadequate and incomplete. The DEIR must be withdrawn, revised, and recirculated for meaningful and constructive review and comments.

In the setting and impact assessment regarding geology, DEIR statements add to interpretations in the appendix and differ from those in the relevant appendix. Such statements are not apparently prepared by the geology consultant and thereby appear to be geological interpretations by uncertified DEIR preparers.

Cultural Resources, Land Uses, Hazards, and other DEIR sections include references to historic or past development of the sites and general area but provides limited factual evidence (e.g., ground level photos). Other City of LA CEQA documents have included review and use of historic aerial photos from 1923, 1928, and later and a composite hardcopy for the City is mounted on the 5th floor of City Hall. This DEIR does not include or review such aerial photos, and therefore the deficiency renders these sections as inadequate and incomplete.

The City of LA, Harbor Department, has expanded the scope of the Hazard assessment in a recent DEIR for harbor facilities, and Hazards must include "terrorist" risks and events, e.g., "Twin Towers" syndrome (two attacks). Given the prominent location and significant presence in the City, the Project would appear to warrant consideration of risks and mitigation for risk and realization and therefore the deficiency renders the Hazard section as inadequate and incomplete.

Population, households, housing, and employment/jobs are generally described and assessed; however, the basic foundations of such are referred to State Department of Finance and SCAG (So. Calif. Association of Governments) without describing and documenting the allocation process from SCAG numbers through LA County and General City Plan to the Project-relevant Community Plan and the Project itself. Therefore all three-plus DEIR sections cannot be verified, reviewed, or quantified for public consideration. Similarly financial and economic discussions cannot be verified, quantified, and mentioned without the description of the allocation process for the dependent Pop/Hhld/Jobs.

Detailed comments are provided hereafter for more specific comments and recommendations.

Please feel free to contact for any clarifications or refinements.

Dr. Tom Williams



**CrossoadsCmtsFin072617.doc**

174K

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Dr. Tom Williams

The Following EIR sections of SCH#:2015101073

Project Objectives

2-13/Items 3,7-9

**No discussion as to Population, Households, Jobs, Affordability, & Traffic projected for existing 2030-40 General and Hollywood Community Plans (Future Setting without Project) and for Plans + Project. Please provide thorough discussion and quantification.**

4.F-16/3 b. Existing Conditions

**No data, quantities, or setting discussion is provided for population, households, dwelling status, employment, etc.. Please provide thorough discussion and quantification.**

4-17/3 "...review of historic documents..." 1920s 1926 1923

**Mentioned without references and citations. Please provide thorough referencing, citations and links for review.**

2-3/Fig. 2-1 Ref.:Eyestone Environ. 2015

4.3-9 4.J Table J-3.4 Eyestone Environmental, 2016

4.3-10 Table 4.J-3.4 Eyestone Environmental, 2016

**Not included on Sec. 7 Please provide thorough referencing, citations and links for review.**

**Sec.7 References listed by CEQA sections without combined listing cause confusion for public review and repeat citations. Please provide thorough combined listing, referencing, citations and links for review.**

4.3-9/1 Project and future growth Community Plan and other elements of the City's General Plan

4.3-9/2 indirect impacts related to population would be less than significant.

4.3-9/3 impacts and the forecasted population for the SCAG Region and the City of Los angeles between 2015 and 2022.

4.3-11/3 ...Project impacts...would not be cumulatively considerable and would be less than significant.

**No setting at levels of City, General or Community Plan(s), Project vicinity/area, or Project site and no quantifications of existing and projected populations, etc. is provided.**

**Please provide thorough modeling and quantification for population, employment and other related parameters and links for review.**

**Although mentioned in DEIR text or appendix F p.27-28, no references are provided for SCEqDataCntr. in either DEIR or appendic F-21-22 7. References**

**DEIR and appendix do not include scedc.caltech.edu earthquake data for the project site, as below:**

Centered: 34.09815 x -118.33588 [34.099, -118.337] Area: Lt. 34.083 - .115 x Lg. -118.319 - .355

Date Time	RM	Lt	Lg	Depth
1947/12/16 09:02	<b>2.26</b>	34.09333	-118.32417	14.9km
1973/07/02 16:04	1.70	34.09050	-118.32483	7.1
1973/07/09 04:21	1.70	34.08500	-118.32733	4.9
1979/03/08 18:21	2.10	34.11400	-118.31967	3.3
1985/02/25 09:09	1.46	34.09200	-118.33000	9.4
1993/05/15 20:50	1.50	34.09700	-118.34100	4.2
2000/09/30 03:45	1.11	34.10200	-118.34600	3.2/10,500ft
2003/01/07 03:03	1.28	34.11050	-118.32583	9.9
2007/01/28 00:03	1.82	34.10683	-118.31900	<b>0.4</b>

**Please provide thorough EQ/Fault modeling and quantification for the Community Plan, Project vicinity/area, and site and links for review.**

**Geotechnical Investigation Appendix F**

4.E-11/1 "The Hollywood Fault...has had relatively minor micro-seismic activity." So.Cal.EQ Data Cntr.

According to SCEQDC...Hollywood Fault is capable of producing a maximum 6.7 magnitude earthquake

References to Geotech. Feasibility Investigation Report

**Confusion is introduced between the appendix and the DEIR text as no citations/no mentions to SCEqDC in references to Geotech. Feasibility Investigation Report. Clarify/revise the entire GFIR appendix and DEIR text.**

GFIR p.F.5/Table 1 HwF 0.5 mi (=2640ft) EP 2.5 mi  
 Table 4.E-1 HwF 0.3 mi ref.:GFIR

**Confusion between appendix and DEIR text. Revise**

p.F.5/3,,closest known fault to the site is the Hw.F....1500 feet north...

p.F.5/4 UEPBF...closest seismic source to the site. 2.5mi

**Confusion between appendix and DEIR text. Revise**

F.5/4 ...during mainly ????

F.6/1 ???within the hanging wall of the fault...

6/2 It is estimated to be capable of generating...

6/2 It is estimated to be capable of producing...

6/2 It is considered to be capable of generating...

6/2 ... considered capable of producing...

**No definitions/differences for capable for producing or generating. Confusion - Revise**

Apdx F: **no FN / References**

E.4-11/1 According to **SCEDC...it is believed**

E.4-11/2 /3 12/1 12/2

E.4-12/FN18 SCEQC Working Group 2001 **incorrect cited in text** 13/FN19

E.4-13/1 capable - producing **No definition for capable for producing or generating**

E.4-13/2 SCEQC

p.F-7/3 practices codes Class D GFIR

**No basis is provided for selection of "Class D" compared to those applied throughout the Community Plan.**

Appendix F/GDC-Fig.5, pdf38 Boring Location Plan, **4 parcels, 9 buildings 4 CPTs 70ft 3 Borings 50ft tti 7**

p. F/ GDC-Fig.9, pdf42 City of Los Angeles, City General Plan, Safety Element, Fault Rupture Study Area,

**No basis is provided for specific exclusions of faults from the Project vicinity at depth other than surface traces, including blind faults and those sources of measured earthquakes in the Project vicinity.**

**Provide map and sections of all fault planes passing beneath the Project vicinity which have measured or expected earthquakes within 5 miles of Project site.**

**No plan or basis of design has been referenced or mentioned in DEIR text or appendix for the number and depths of borings and CPTs. Provide boring logs for all buildings plus 30ft beneath the lowest excavated floor and piling for support of excavation. Provide technical and quantification for basis of drilling/boring/CPT program.**

**Differences exist between the appendix and the DEIR text with regard to several geological and geotechnical issues. Please provide names/State #s for any licensed, registered, or certified geologist or geotechnical engineer who participated in the DEIR preparation and who specifically prepared interpretations of the relevant appendix.**

### **Land Use**

4.H-8/3 Hollywood Community Plan "...serves...to meet **existing and anticipated needs and conditions...**to balance growth...reflect economic potentials and limits, and land development."

4.H-33/Table 4.H-2 "Objective 3.1...existing and future residents...Consistent....The Project would support the needs of existing and future residents...of the Hollywood community." Source: Eyestone Environmental, 2016.

Goal 5A "future residents... attractive to future investment...Consistent...infill redevelopment...new development that would be attractive to future investment..." Source: Eyestone Environmental, 2016.

4.H-48 "...existing and future residents...Consistent....The Project would support the needs of existing and future residents..."

**Clarify and delineate "community" or Community Plan.**

**No definition or quantification of "needs", "anticipated", and "future residents".**

**Define "future investment", "attractive"**

**Please provide thorough discussion and quantification.**

**Please provide to the public for review: "Eyestone Environmental, 2015, 2016, & 2017."**

- 4.H-61 "...allowed by future amendments to the Community Plan."  
 4.H-64 "Goal 12:...circulation system...with an emphasis on...meeting future needs."  
 4.H-72 "...would complement...future development...Hollywood community."

***This section clearly indicate future growth inducements or "attraction" from for the Project. Provide thorough discussion and quantification of future growth and continuing infilling. Provide thorough discussion and quantification of future by-right growth/infilling based on the existing General and Community Plans and any approved specific plans and a comparison with the future growth with the project and induced growth.***

- 2-51 "would also utilize...whenever feasible."  
 5-1 "...permit a reasoned choice are addressed....must be feasible..."  
 5-2 "...if feasible."  
 5-2 "...cannot be feasibly mitigated  
 5-3 "...as infeasible... as infeasible..."  
 5-3/-4 "...makes this alternative infeasible."  
 5-80 "...all feasible mitigation..."  
 5-144 "...all feasible mitigation..."  
 5-319 "...all feasible mitigation..."  
 5-201 "...all feasible mitigation..."  
 5-329 "...deemed infeasible...cannot be consistent with a [General Plan] element...not been adopted..."

***A "reasoned choice" requires a clear and numerical process which has not been provided for alternatives and other sections of this DEIR.***

***Feasible/infeasible are not defined or quantified and are related to be economic analyses. Provide definitions with quantifications and monetarizations of feasible.***

- 5-3 "...primary Project objectives..." "...primary objectives of the Project..."  
 5-3 "...the basic project objectives,"  
 5-4 "...basic objectives..."  
 5-5 "...underlying purpose and basic Project objectives..."  
 5-154 "...primary Project objectives"  
 Basic vs Primary objectives without quantification/numerical comparisons of alternatives

- 5-19/1 local and regional planning objectives  
 44/2 108/1 169/2 GHG goals and objectives...in state, regional, and local regional... plans.  
 116/3 177/3 goals policies, and objectives in local and regional plans

- 5-3/1, /3, 4/1, Basic 5-3/2, /4, 4/2, Primary 152/3 4. ...Project Objectives...**primary** Project objectives.  
 154/2 **primary** Project objective...**underlying purpose of the Project**  
 330/3 Project objectives or the Project's underlying purpose...

- 26/2 Project Objectives  
 88/3 4. ... Project Objectives 2 not comply 89/1 10 objectives  
 153/3 other Project objectives 11 objectives  
 332/1 following objectives to the same extent as the Project.  
 332/2 would not meet the **underlying purpose of the Project** to the same extent as the Project.  
 333/2 realize the **underlying purpose** of the Project...

***Primary and basic objective or purpose are not defined or listed and are not segregated from other objectives. Provide definitions with listings.***

- 5-3 "...help meet the demand for new housing..."  
***Feasible/infeasible are not defined or quantified and are related to be economic analyses. Provide definitions with quantifications and monetarizations.***

- 5-329 "...Proposed Hollywood Community Plan Update"  
 5-331 "...help meet the market demand for new housing in the Hollywood Community Plan area;"

**No approved update is current, and current plan is out-of-date. Provide expected or current new housing based on current and expected plan and provide quantitative projections.**

2-14 "...support growth of the City's economic base...introduction of an economically project..."

No economic setting and assessment of 2040 growth of City and for Hollywood Community Plan

5-331 " support the growth of the City's economic base...economically viable...revenue generating commercial activities...generates new tax revenues"

5-333 "...provide new restricted affordable housing...to satisfy...needs and desires of all economic segments..."

**No "economic viability" is provided with regard to revenue generation and tax revenues**

**References to the Project/City economics, finances, taxes, revenues, etc. require thorough, quantified review and model of current, projected with/without Project finances. No approved update of the Community Plan is current, and current plan is out-of-date. Provide expected or current new housing based on current and expected plan and provide quantitative projections and financial model.**

2-13 "...underlying purpose of the Project...transform...parcels..."

2-13 "...with sustainable urban planning principles,..."

2-13 "Provide... affordable...units...**satisfy...varying needs and desires of all economic segments in the Hollywood Community.**"

2-13 "...introduction of economically viable project..."

2-13 "...help meet the market demand for new housing in the Hollywood Community Plan area;"

**Provide expected or current new housing based on current and expected "needs and desires" plan. Provide quantitative projections and financial model for economic viability and sustainability of Community Plan housing.**

**Cultural Resources, drainage and groundwater recharging, and hazardous land uses make no use of 1923-28 and pre-1948 aerial photos as used in other MND/EIRs by LACity DCP. Revise all pertinent sections and provide review copies of aerial photos as appendices.**

4.E-25/4 Level of Significance after Mitigation

Rigorous investigation process...would be less than significant...