

From: Richard Gerger <rgerger01@gmail.com>
Sent time: 06/01/2020 01:57:51 PM
To: Mindy Nguyen <Mindy.Nguyen@lacity.org>
Cc: The Hollywood Dell Civic Association <alexa@hollywooddell.com>; mayor.garcetti@lacity.org; councilmember.ofarrell@lacity.org; david.ryu@lacity.org; vincebertoni@lacity.org; kevin.keller@lacity.org; jim@myhunc.com; george@myhunc.com; president@hillsidefederation.org
Subject: Letter for Hollywood Center Project, Case Number : ENV-2018-2116_EIR
Attachments: Letter to Ms Nguyen re Draft EIR.pdf

Ms. Nguyen,

Please confirm receipt.

Thank you,

Richard Gerger

Letter to Ms Nguyen re Draft EIR.pdf
May 30, 2020

Mindy Nguyen – City Planner
City of Los Angeles Department of Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012
Email: mindy.nguyen@lacity.org

RE: Hollywood Center Project, Case Number: ENV-2018-2116-EIR and State Clearinghouse Number: 2018051002

Dear Ms. Nguyen:

I have been a homeowner and resident of the Hollywood Dell for the past twenty-four years. My wife and I have been active members of the Hollywood Dell Civic Association since we moved to the neighborhood from Beachwood Canyon in 1996. The Hollywood Dell is the hillside neighborhood directly north of the Project site.

The majority of my comments and questions are specific to Section IV.J. – Population and Housing of the Draft EIR.

1. The report indicates the Land Use Element of the City’s General Plan is comprised of 35 Community Plans and states the “City’s Community Plans are intended to provide an official guide for future development and propose approximate locations and dimensions of land use at the community level.” Furthermore, the report acknowledges the Project is located within the Hollywood Community Plan area and the 1988 Hollywood Community Plan is still in effect. However, the report professes that:

“The Project or the Project with the East Side Hotel Option would not induce substantial unplanned population growth in an area, either directly (for example by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). Therefore, the Project would result in less than significant impacts related induced (sic) substantial unplanned population growth.”

without including analysis of the impact from the Project or the Project with the East Side Hotel Option on population and housing growth within in the Hollywood Community Plan area. Rather, in an effort to support the opinion quoted above, the report relies on analyses based on population, housing, and employment growth estimates for the entire City of Los Angeles, not population, housing, and employment growth estimates for the Hollywood Community Plan area.

Why does the evaluation of population growth rely on growth estimates for the entire City of Los Angeles and what analyses have been done to support the opinion quoted above based on growth estimates for the Hollywood Community Plan area?

- 2. The report includes discussion of the cumulative impacts of the Project or the Project with the East Side Hotel Option and Appendix L of the report includes a “calculation of the cumulative number of housing units, population, and employees attributable to” the 123 projects located in the City of Los Angeles and the 27 projects located in the City of West Hollywood listed in Table III-1 of Chapter III of the report. As noted by the report, the Project is located within the Hollywood Community Plan area and the 1988 Hollywood Community Plan is still in effect. However, the report professes that:

“...the Project’s or the Project with the East Side Hotel Option’s contribution to cumulative impacts would not be cumulatively considerable. As such, cumulative impacts on population and housing would be less than significant.”

without including analysis of the cumulative impact from the Project or the Project with the East Side Hotel Option and other projects listed in Table III-1 of Chapter III of the report located in the Hollywood Community Plan area on population and housing within in the Hollywood Community Plan area. Rather, in an effort to support the opinion quoted above, the report relies on analyses based on population, housing, and employment growth estimates for the entire City of Los Angeles, not population, housing, and employment growth estimates for the Hollywood Community Plan area.

Why does the evaluation of the cumulative impacts on population and housing rely on growth estimates for the entire City of Los Angeles and what analyses have been done to support the opinion quoted above based on growth estimates for the Hollywood Community Plan area?

- 3. The report acknowledges the Project is located within the Hollywood Community Plan area and the 1988 Hollywood Community Plan is still in effect. Furthermore, the report states that key provisions relating to population and housing of the Hollywood Community Plan regarding preferred development in the Project vicinity include:

Objective 3: To make provision[s] for the housing required to satisfy the varying needs and desires of all economic segments of the Community, maximizing the opportunity for individual choice.

Objective 4a: To promote economic well-being and public convenience through allocating and distributing commercial lands for retail, service, and office facilities in quantities and patterns based on accepted planning principles and standards.

The report, however, does not identify Objective 7 of the Hollywood Community Plan as a key provision relating to population and housing. Objective 7 states:

Objective 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.

Section IV.J., Population and Housing of the report also does not include the proposed residential density categories and their capacities pursuant to the Hollywood Community Plan. Under the Hollywood Community Plan, the proposed dwelling units per gross acre for high density residential areas is 60+ - 80.

What is the proposed number of dwelling units per gross acre (as defined in the Hollywood Community Plan) of the Project or the Project with the East Side Hotel Option?

It appears the Project proposes approximately 200 dwelling units per gross acre (as defined in the Hollywood Community Plan), how is this proposal consistent with the 60+ - 80 range identified for high density residential areas in the Hollywood Community Plan?

What is the impact on population growth within the Hollywood Community Plan area of substantially increasing the density for high density residential areas in the Hollywood Community Plan area?

The Project increases the number of dwelling units per gross acre by proposing two towers with heights substantially higher than existing developments, what is the impact of the Projects proposed increase in density on Objective 7 of the Hollywood Community Plan, i.e., “to promote the preservation of views ... for the enjoyment of both local residents and persons throughout the Los Angeles region” pursuant to Objective 7 of the Hollywood Community Plan?

4. The report states “[w]hile HQTAs account for only three percent of the total land area in SCAG’s region, HQTAs are expected to accommodate 46 percent and 55 percent of future household and employment growth, respectively, between 2012 and 2040. The report frequently refers to the expectation that HQTAs will accommodate a significant portion of population and employment growth in section IV.J, Population and Housing, of the report. However, these expectations were developed prior to the COVID-19 pandemic. As a result of the pandemic it is currently known that public confidence and use of public transit is significantly reduced. People do not want to be in enclosed

environments where they may be exposed to the virus. Furthermore, people may become less willing to reside in high density developments.

What is the expected impact of the COVID-19 pandemic on population and employment growth in HQTAs?

5. The report professes that:

“...the Project’s or the Project with the East Side Hotel Option’s contribution to cumulative impacts would not be cumulatively considerable. As such, cumulative impacts on population and housing would be less than significant.”

However, the report also acknowledges that the “West and East Buildings would have a substantially greater height and intensity than existing development in the area” and the Project would boost residential densities, significantly increasing housing opportunities in the Hollywood Community Plan area.” However, the analysis in Section IV.J, Population and Housing of the report does not appear to include discussion or analysis of the expected cumulative impact on population and housing in the Hollywood Community Plan area of boosting residential densities consistent with densities proposed by the Project.

What is the expected cumulative impact on population and housing for the Hollywood Community Plan area resulting from the boost in residential densities proposed by the Project?

6. The report opines the Project presents “No Conflict” with Objective 7 of the Hollywood Community Plan. Objective 7 states:

Objective 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.

However, in supporting this opinion the report does not address the impact of the West and East Buildings, which the report acknowledges “would have a substantially greater height and intensity than existing development in the area,” on views of local residents or persons throughout the Los Angeles region. Towers which are of substantially great height and intensity than any existing or other currently proposed development in the Hollywood Community Plan area will certainly have an impact of the views of local residents or persons throughout the Los Angeles region.

What is the impact on views of the Hollywood Hills from existing developments south of the Project and of views of the area south of the Hollywood Hills from existing residential areas located in the Hollywood Hills?

Would the impact on views of the Hollywood Hills from existing developments south of the Project and of views of the area south of the Hollywood Hills from existing residential areas located in the Hollywood Hills be mitigated by reducing the height and intensity of the West and East Buildings to levels consistent with existing development in the area and proposed densities described in the Hollywood Community Plan?

- 7. The report does not address the traffic impact of the Project or the Project with the East Side Hotel Option on the Franklin Avenue/Argyle Avenue intersection. This intersection is one block to the north of the project site. Prior to COVID-19, commuters waited several light cycles to pass through this intersection during heavy traffic periods. The project will increase traffic at this intersection.

Why was the Franklin Avenue/Argyle Avenue intersection excluded from the report's traffic analysis?

What is the expected impact of the Project or the Project with the East Side Hotel Option on traffic at the Franklin Avenue/Argyle Avenue intersection?

- 8. The report does not address the traffic impact of the Project or the Project with the East Side Hotel Option on the north bond on-ramp to U.S. Highway 101 from Cahuenga Avenue or the north bond on-ramp to U.S. Highway 101 from Franklin Avenue. Prior to COVID-19, these on-ramps and the streets providing access to these on-ramps were heavily congested on a daily basis during the evening commute. The project will increase traffic at these on-ramps and the streets providing access to these on-ramps.

Why were the north bond on-ramp to U.S. Highway 101 from Cahuenga Avenue and the north bond on-ramp to U.S. Highway 101 from Franklin Avenue excluded from the report's traffic analysis?

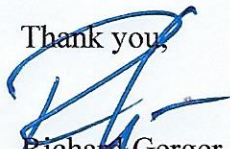
What is the expected impact of the Project or the Project with the East Side Hotel Option on traffic at the north bond on-ramp to U.S. Highway 101 from Cahuenga Avenue, the north bond on-ramp to U.S. Highway 101 from Franklin Avenue, and the streets providing access to these on-ramps?

- 9. The report does not address the traffic impact of the Project or the Project with the East Side Hotel Option on U.S. Highway 101. Prior to COVID-19, traffic on U.S. Highway 101 through the Hollywood area was heavily congested on a daily basis during the morning and evening commute. The project is located one block to the south of U.S. Highway 101; the project will increase traffic on this highway.

Why was U.S. Highway 101 excluded from the report's traffic analysis?

What is the expected impact of the Project or the Project with the East Side Hotel Option on traffic on U.S. Highway 101?

Thank you,



Richard Gerger
Hollywood Dell Resident

Cc:

Hollywood Dell Civic Association

Hollywood United Neighborhood Council

The Federation of Hillside & Canyon Associations

Eric Garcetti, LA City Mayor (mayor.garcetti@lacity.org)

Mitch O'Farrell, LA City Council Member District 13 (councilmember.ofarrell@lacity.org)

David Ryu, LA City Council Member District 4 (david.ryu@lacity.org)

Vince Bertoni, Director of City Planning (vince.bertoni@lacity.org)

Kevin Keller, Officer of City Planning (kevin.keller@lacity.org)