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Sent time: 06/01/2020 01:38:04 PM
To: mindy.nguyen@lacity.org
Cc: vince.bertoni@lacity.org; mayor.garcetti@lacity.org; councilmember.ofarrell@lacity.org; councilmember.ryu@lacity.org
Subject: ENV-2018-2116-EIR Hollywood Center
Attachments: Hollywood Center Project - KOA Technical Mem.pdf ENV-2018-2116-EIR ltr for record 5-26-2020.pdf

Please add the enclosed documents into the public record from Beachwood Canyon Neighborhood Association. In addition to the points that we raise along with the in-depth traffic review enclosed, we have serious issues with the failure of the City to extend the public comment period allowed for this project. Many have asked for a simple 60 day extension because of the issues associated with the current Pandemic.

This request should be given more weight in light of the fact that City Hall is now being protected by many uniformed officers and troops from the National Guard because of the ongoing unrest. The City of Los Angeles has been declared a State of Emergency. How many had planned on delivering their documents today? Many have a voice but don't have a computer.

We ask here again for an extension of time to allow all who wish to speak about this project to do so safely.

Respectfully,

Fran Reichenbach, founder and treasurer of the Beachwood Canyon Neighborhood Association
323-610-1967



TECHNICAL MEMORANDUM

Date: June 1, 2020

To: Alexander von Wechmar – The Oaks Homeowners Association

From: Brian Marchetti, AICP

Subject: Review of Hollywood Center Draft EIR Traffic Assessment

This letter provides a review of potential impact areas not reviewed to an adequate level by the Hollywood Center (formerly Millennium Hollywood project) traffic study and EIR, focusing on areas of particular concern to The Oaks Homeowners Association.

Area resident associations and the local Neighborhood Council have expressed concerns over the adequacy of the traffic analysis in comment letters submitted to the City on the EIR. The Oaks Homeowners Association submitted a comment letter on the project Notice of Preparation on October 4, 2018, stating concerns over high existing traffic volumes on Franklin Avenue and the potential negative effects on this corridor from the proposed project. The Argyle Civic Association, representing the local neighborhood on Argyle Avenue, submitted a letter on September 4, 2018, with similar concerns on routes to and from freeway access points via Argyle Avenue, Franklin Avenue, and other local roadway routes. The Hollywood United Neighborhood Council provided a list of issues requested to be included in the EIR analysis, including an expanded analysis of freeway access and traffic impacts on area roadways including Franklin Avenue. The Hollywood Dell Civic Association filed an appeal in opposition to the former Millennium Project, and traffic needs were defined in that appeal for the Argyle/Franklin intersection and the Franklin Avenue corridor

Concerns over the adequacy of analysis of project traffic to the north of the site, to the US-101 and Franklin Avenue corridors, are described in more detail below.

Freeway Impacts

Appendix N-1 of the Draft EIR for the proposed project is the Traffic Assessment document. Attachment D of that document is the "State Highway Level of Service Analysis Summary of Results" The following was stated in this document regarding the applied methodology to the freeway facilities analysis:

"Based on discussions with Caltrans, a Project-related effect is considered substantial if the traffic generated by the Project: (a) causes the freeway mainline segment level of service (LOS) to deteriorate to LOS F; or (b) when the segment is already at LOS F, causes an increase in the demand/capacity ratio of greater than or equal to 2%." The mainline is the primary roadway of a freeway facility, or the segments between interchanges.

The Caltrans Traffic Impact Study Guide is currently being updated and will be adopted soon, as part of State efforts at incorporating guidance from Senate Bill (SB) 743, and the related implementation of the new California Environmental Quality Act (CEQA) guidelines for transportation analysis that includes the vehicle miles traveled (VMT) metric. The previous version of the Guide, however, stated that the addition of any trips to a facility with deficient LOS (usually E or F, but depending upon the facility) is considered significant. The application of a volume-to-capacity (V/C) ratio increase of 0.02 or higher is more adopted from local jurisdictional guidelines (although many including those defined by LADOT for City roadways are 0.01 at LOS E or F) than consistent with any guidelines for State facilities that have been adopted by Caltrans. The reasoning for the selective adoption of this standard for this project deserves further discussion in the EIR. Many projects that are smaller in size than the proposed project are often determined to have significant impact determinations on freeway facilities.

Appendix I of the updated traffic study is entitled "Intersection Analysis Results Not Required by Transportation Assessment Guidelines". This appendix documents an analysis using the recent but superseded LADOT traffic study guidelines. The following conclusions can be made from the presented data:

- The existing plus-project impact at Argyle/Franklin intersection was 0.009 and 0.010 for the AM and PM peak hours at LOS F.
- The future with-project impact at this location was determined to be 0.009 and 0.011.
- The incremental impact of 0.010 or higher at LOS values of E or F would have been significant under the previous LADOT guidelines. Therefore, the values of 0.010 and 0.011 above would have been significant under the previous LADOT guidelines.

Under current LADOT guidelines, vehicle delay is applied to local intersection analysis in Traffic Assessments reviewed by LADOT, instead of volume-to-capacity values. But the analysis in Appendix I shows the potential for proposed project impacts in the Franklin Avenue corridor, but analysis of this roadway has not been provided in the delay-based analysis.

Study Area and Lack of Analysis to the North

In Appendix E (Added Intersections Analysis, January 2013) of the Final EIR for the previously proposed Millennium project, the following was discussed:

"...in comments on the Draft EIR, concerns were raised about significant Project impacts extending beyond the northern boundary of the area analyzed in the Traffic Study. Two intersections located on the northern boundary of the study area were considered to be significantly impacted - Highland Avenue/Franklin Avenue (north) and Argyle Avenue/Franklin Avenue/I-101 Freeway Northbound On-Ramp in the Traffic Study."

It was stated in this Appendix that the analysis was for informational purposes only, but was provided to address the impacts of the project within an added area beyond what had been included in the study area. These locations were north of the significantly impacted intersections in the traffic study.

There was concerns expressed in public comments on the 2013 study about potential impacts to the north of the project, and the traffic study defined an existing plus-project and a future with-project impact

at the Argyle/Franklin intersection. In the future period, the incremental impact was at 0.029 of the volume-to-capacity ratio when the maximum impact standard is 0.010 at the stated LOS value of F.

On the 2012 Draft EIR, Comment No. 03-6 was submitted by Caltrans, which requested that six freeway ramp/roadway intersections be added to the study area. The Argyle/Franklin/US-101 northbound ramp intersection was included in this request. Therefore, Caltrans had previous strong concerns about project traffic at ramp intersections, but these were excluded from the Hollywood Center Project Traffic Assessment, other than the queuing analysis conducted at some for the freeway corridor analysis. The project trip distribution in the 2012 Draft EIR Traffic Study included the following pattern to the north of the project:

- 10 percent outbound trip distribution north on Argyle Avenue from site, six percent to US-101 northbound ramp at Argyle/Franklin.
- 5 percent inbound trip distribution to Beachwood Drive exit connection and 4 percent westbound on Franklin Avenue. Both of these paths then combined as a 9 percent distribution to make left-turn movement southbound onto Argyle Avenue. An additional one percent is added from the area to the north of Franklin Avenue.

On Figure 7A of the 2020 traffic study, 20 percent of project trips are shown to generally travel north in the Cahuenga Boulevard corridor. An additional 5 percent of traffic is generally assigned to the Vine Street corridor, without any definition as to east-west corridors where traffic may be destined or originating. This is a reduction in distribution to the Vine Street and Franklin Avenue corridors without any justification for this change. Restoration of the previous trip generation pattern applied in the 2012 study could trigger significant impacts to the north of the project that are potentially avoided by this change in distribution.

The study area map illustrates the geographic holes that have been left in the analysis, in that three local roadway segments were analyzed to the north, but major intersections in between those location and the project site were omitted from the analysis. The three analyzed local roadway segments on Argyle Avenue, Vista del Mar Avenue, and Carmen Avenue, all to the north of Franklin Avenue, represent the north end of the study area. If the study area was defined based on where impacts could occur, the omission of major intersections in the Franklin Avenue corridor between the project site and these roadway segment analysis locations is an omission that should be rectified.

The use of the VMT metric in traffic studies in the City of Los Angeles to fulfill updated CEQA guidelines has created a hybrid approach to studies under LADOT review. This includes more focused local intersection and segment study areas for vehicle volumes and level of service, and a regional approach to larger area impacts analysis through VMT analysis. This approach should not truncate study areas so far that local routes to and from major regional travel routes such as the US-101 corridor along Franklin Avenue are excluded. Potential impacts in this corridor represent a local issue.

Cumulative Project Impacts

Other projects in the area have added new daily and peak-hour vehicle volumes to the Argyle Avenue and Franklin Avenue corridors, due to their proximity to these roadways:

- Argyle House (1755 Argyle / 6220 West Yucca) – This project has two buildings. One is 32 stories in height, including 6,980 square feet of commercial/restaurant space, residential and hotel areas. 191 multi-family residential units, and 260 hotel rooms.
- Kimpton Everly Hotel (1800 Argyle) – A 225-room hotel.

Both of these projects were included in the cumulative/planned projects list in the traffic study and are currently operational, but their effects on the roadways to the north of Yucca Street where access is provided to and from the US-101 freeway is not considered in the Hollywood Center Project Traffic Assessment. Yucca Street is the northern limit of the project study area. An expansion of the study area to the north would disclose potential impacts in this area but currently this is not analyzed under current guidelines in the study.



Beachwood Canyon

NEIGHBORHOOD ASSOCIATION

May 26, 2020

Los Angeles Department of City Planning
221 N. Figueroa Street
Suite 1250
Los Angeles, CA 90012

Environmental Case No.: ENV-2018-2116-EIR

Project Name: Hollywood Center Project

The Beachwood Canyon Neighborhood Association stands opposed to this project for several reasons outlined in the Draft EIR issued on April 16, 2020.

After completion, this project would impose significant, lasting, and detrimental effects on the surrounding community that has always enjoyed a quiet and peaceful co-existence with the destination community of Hollywood.

Traffic near 101 NB onramp: Because of recent construction and the addition of larger projects that already surround this property. The surrounding streets are extremely narrow and can barely support existing traffic.

The existing time to enter the 101 Freeway in either direction is currently 10 to 15 minutes during peak travel times. Although they say the project is "transit friendly" the reality is that each and every owner of any unit in the building will most likely be using their own car. Emergency Resources: Emergency response times will be increased as the demand will increase with the density of this project. Upper Beachwood Canyon and other canyon residents will not be able to count on reasonable delivery of these critical services. Lives are on the line.

Evacuation in case of fire: Beachwood Canyon (especially the northern end) is surrounded by parkland with overgrown brush. Evacuation plans are only as good as the ability for people to get through the expected gridlock in Hollywood resulting from the many new car trips generated by the Millennium Center. Lives are on the line.

Parking: Currently, employees and patrons of the business in Hollywood drive up into Beachwood and into Argyle and parking their cars, carpooling down into Hollywood to work or play. Parking is already slim and is the source of many complaints. This will be unbearable once this busy new business is developed.

Water/Power/Sewer Services: the amount of services this project promises to drain from our already overwhelmed water supply, power grid and sewer system will cause extensive damage to the entire region. Power outages will be a routine issue which could be a health issue for the residents in the project, not to mention the surrounding community. An independent study needs to be done regarding projections of water resources as well as the burden that will be placed on the sewer system and power grid from this project.

Developer has a bad track record: The developer seeking the project has a long history of changing things up to save himself money after receiving approval, hoping no one will notice. Check out the San Francisco (leaning) Millennium Tower for past history.

Residents, neighborhood groups and Councils, surrounding businesses, join our organization, the BCNA in opposition to the project and we hope that you will address and consider the opposition beyond a cursory thought and work with the community to preserve the public's safety and our way of life.

Sincerely,



Missy Kelly
President
Beachwood Canyon Neighborhood Association.