

II. Responses to Comments

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A. Introduction

Sections 21091(d) and 21092.5 of the Public Resources Code (PRC) and CEQA Guidelines Section 15088 govern the lead agency's responses to comments on a Draft EIR. CEQA Guidelines Section 15088(a) states that "[T]he lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments that were received during the notice comment period and any extensions and may respond to late comments." In accordance with these requirements, this section of the Final EIR provides the responses prepared by the City of Los Angeles Department of City Planning (City) to each of the written comments received regarding the Draft EIR.

Section II.B, Matrix of Comments Received on the Draft EIR, includes a table that summarizes the environmental issues raised by each commenter regarding the Draft EIR. Section II.C, Responses to Comments, provides the City's responses to each of the written comments raised in the comment letters received on the Draft EIR. Copies of the original comment letters are provided in Appendix FEIR-1 of this Final EIR.

II. Responses to Comments

B. Matrix of Comments Received on the Draft EIR

Table II-1
Matrix of Comments Received on the Draft EIR

Letter No.	Commenter	Executive Summary	Project Description	Environmental Setting	Aesthetics	Air Quality	Biological Resources	Cultural Resources	Energy	Geology and Soils (including Paleontological Resources)	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Hydrology and Water Quality—Hydrology	Hydrology and Water Quality—Water Quality	Land Use	Noise	Population and Housing	Public Services—Fire Protection	Public Services—Police Protection	Public Services—Schools	Public Services—Parks and Recreation	Public Services—Libraries	Transportation	Tribal Cultural Resources	Utilities and Service Systems—Water Supply and Infrastructure	Utilities and Service Systems—Wastewater	Utilities and Service Systems—Solid Waste	Utilities and Service Systems—Energy Infrastructure	Cumulative Impact	Alternatives	General/Other	CEQA	Mitigation Measures	Support		
STATE AND REGIONAL																																				
1	Christine Asiata Rodriguez christine.asiata@opr.ca.gov																																		X	
2	Shine Ling, AICP Manager, Transit Oriented Communities Metro Development Review One Gateway Plaza, MS 99-22-1 Los Angeles, CA 90012-2952		X											X	X								X										X			
3	Miya Edmonson IGR/CEQA Branch Chief Caltrans District 7 100 S. Main St., MS 16 Los Angeles, CA 90012-3721																						X													
4	Ali Poosti Division Manager Wastewater Engineering Services Division LA Sanitation and Environment																								X											
5	Alex Campbell Assistant CEQA Project Manager Los Angeles Unified School District 333 S. Beaudry Ave, Fl. 21 Los Angeles, CA 90017-1466																			X			X													

II. Responses to Comments

C. Comment Letters

Comment Letter No. 1

Christine Asiata Rodriguez
christine.asiata@opr.ca.gov

Comment No. 1-1

The State Clearinghouse would like to inform you that our office will be transitioning from providing a hard copy of acknowledging the close of review period on your project to electronic mail system.

Response to Comment No. 1-1

This comment, which informs the City that the State Clearinghouse is moving to a digital response system, is noted for the record.

Comment No. 1-2

Please visit: <https://ceqanet.opr.ca.gov/2017051079/3> for full details about your project and if any state agencies submitted comments by close of review period (note: any state agencies in **bold**, submitted comments and are available).

Response to Comment No. 1-2

This comment provides a link to the State Clearinghouse webpage for the Project. The sole comment letter from a state agency is the letter from Caltrans dated April 7, 2020 which is included as Comment Letter 3 below. Refer to Response to Comment Nos. 3-1 through 3-6 for detailed responses to the Caltrans letter.

Comment No. 1-3

This email acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please email the State Clearinghouse at state.clearinghouse@opr.ca.gov for any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Response to Comment No. 1-3

This comment concludes the letter by acknowledging the Project has complied with State Clearinghouse review requirements under CEQA and provides a contact email. This comment is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment Letter No. 2

Shine Ling, AICP
Manager, Transit Oriented Communities
Metro Development Review
One Gateway Plaza, MS 99-22-1
Los Angeles, CA 90012-2952

Comment No. 2-1

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Hollywood & Wilcox (Project) located at 6430–6440 West Hollywood Boulevard and 1624–1648 North Wilcox Avenue in the City of Los Angeles (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

Per Metro's area of statutory responsibility pursuant to sections 15082(b) and 15086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide the City with specific detail on the scope and content of environmental information that should be included in the Environmental Impact Report (EIR) for the Project. In particular, this letter outlines topics regarding the Project's potential impacts on the Metro B Line (Red) and Metro bus facilities and services which should be analyzed in the EIR, and provides recommendations for mitigation measures and project design features as appropriate. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.¹

¹ See CEQA Guidelines section 15064.3(a); Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts In CEQA, December 2018, p. 19.

Response to Comment No. 2-1

This introductory comment, which defines Transit Oriented Communities (TOCs) and states the purpose of the letter, is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment No. 2-2

In addition to the specific comments outlined below, Metro is providing the City and 6436 Hollywood Blvd., LLC and 1624 Wilcox Ave., LP (Applicant) with the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro right-of-way (ROW) and transit facilities, available at www.metro.net/projects/devreview/.

Response to Comment No. 2-2

This comment provides a link to the Metro Adjacent Development Handbook. Where facilities constructed and operated by Metro are potentially affected by the Proposed Project, the Applicant will comply with the requirements of Metro's most recent "Design Criteria and Standards", Volume III, Adjacent Construction Design Manual. However, as set forth in Response to Comment No. 2-7, below, impacts to the Metro tunnel and infrastructure are less than significant. This comment is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment No. 2-3**Project Description**

The Project includes the development of a 15-story mixed-use building, comprised of 260 multi-family residential units and 17,800 square-feet of commercial uses.

Response to Comment No. 2-3

This comment, which partially summarizes the project description, is noted for the record.

Comment No. 2-4**Recommendations for EIR Scope and Content***Bus Service Adjacency*

1. Service: Metro Bus Lines 212, 217, 232, and 780 operate on Hollywood Boulevard, adjacent to the Project. One Metro Bus stop(s) is across the street from the Project site at Hollywood and Cahuenga. Other transit operators, such as LADOT, may provide service in the vicinity of the Project and should be consulted.

Response to Comment No. 2-4

This comment provides information on Metro bus service adjacent to the Project Site. As detailed in the VMT Memo included as Appendix O.2 of the Draft EIR, it is recognized that Metro Bus Lines 212, 217, and 780, as well as the LADOT DASH Hollywood Line, operate along Hollywood Boulevard adjacent to the Project Site, with a bus stop located at the southwest corner of Hollywood Boulevard & Wilcox Avenue. Additional bus stops were also identified within a 0.25-mile walking distance on Hollywood Boulevard and Cahuenga Boulevard. Metro Bus line 232 does not serve the Project Area; rather it runs between the Los Angeles International Airport and Long Beach along Pacific Coast Highway. As such, it was not included in the bus lines discussed in the Draft EIR.

Comment No. 2-5

2. **Impact Analysis:** The EIR should analyze potential effects on Metro Bus service and identify mitigation measures or project design features as appropriate. Potential impacts may include impacts to transportation services and temporary or permanent bus service rerouting. Specific types of impacts and recommended mitigation measures to address them include, without limitation, the following:
 - a. **Bus Stop Condition:** The EIR should identify all bus stops on all streets adjacent to the Project site. During construction, the Applicant may either maintain the stop in its current condition and location, or temporarily relocate the stop consistent with the needs of Metro Bus operations. Temporary or permanent modifications to any bus stop as part of the Project, including any surrounding sidewalk area, must be Americans with Disabilities Act (ADA)-compliant and allow passengers with disabilities a clear path of travel between the bus stop and the Project. Once the Project is completed, the Applicant must ensure any existing Metro bus stop affected by the Project is returned to its pre-Project location and condition, unless otherwise directed by Metro.
 - b. **Bus Operations Coordination:** The Applicant shall coordinate with Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 not later than 30 days before the start of Project construction. Other municipal bus services may also be impacted and shall be included in construction outreach efforts.

Response to Comment No. 2-5

This comment states that the EIR should analyze the Project's potential effects on Metro services and identify mitigation measures or project design features as appropriate. The types of impacts as specified in the comment include bus stop maintenance and bus operations coordination.

As noted in the Traffic Study included as Appendix O.1 of the Draft EIR, there are currently no Metro bus stops located along the Project frontage. In addition, Project construction activities would not result in any lane closures along Hollywood Boulevard. Furthermore, a Construction Traffic Management Plan would be implemented pursuant to Project Design Feature TR-PDF-1 to ensure pedestrian safety along any affected sidewalks or temporary walkways. Additionally, an analysis of the Project's potential impact on Metro bus service was included in the Traffic Study as part of the CMP Regional Transit Impact Analysis (see Draft EIR Appendix O.1, pages 93–95). As detailed in the Traffic Study, the number of Project trips anticipated to utilize transit (30 net new transit trips in the morning peak hour and 35 net new transit trips in the afternoon peak hour) could be accommodated by within the available capacity on the existing transit lines in the Project vicinity (8,153 in the morning peak hour and 7,197 in the afternoon peak hour). Therefore, neither the construction activities nor operations of the Project would impact Metro bus stops or service, and no mitigation measures would be required. Nevertheless, this comment is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment No. 2-6

Subway Adjacency

1. Operations: The Metro B Line (Red) currently operates peak service as often as every ten minutes in both directions. Trains may operate 24 hours a day, seven days a week in the tunnels below the Project.

Response to Comment No. 2-6

This comment provides current service times for the Metro B (Red) Line. However, the statement that tunnels are below the Project is inaccurate. The subway tunnels do not run under the Project Site; rather the proposed 15-story building would be set back south of Hollywood Boulevard by at least 145 feet. Additionally, as discussed further below in Response to Comment No. 2-7, the one story portion of the Project that would front Hollywood Boulevard would be replacing a similar building, resulting in a minimal change in loading. (See Geotechnical Memorandum—Response to Comments by METRO [Geotechnical Memorandum], prepared by Earth Systems on June 8, 2020, included as Appendix FEIR-2 of this Final EIR.) Nevertheless, this comment is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment No. 2-7

2. Impact Analysis: Due to the Project's proximity to the B Line (Red) tunnels, the EIR must analyze potential effects on subway operations and identify mitigation measures or project design features as appropriate. Critical impacts that should be studied include (without limitation): impacts of Project construction and operation on the

structural and systems integrity of subway tunnels; damage to subway infrastructure, disruption to subway service; and noise and vibration. The following provisions should be used to develop a mitigation measure and/or project design feature that addresses these potential impacts:

Response to Comment No. 2-7

As discussed in Draft EIR Section II, Project Description, the Project includes the development of a one story commercial building along Hollywood Boulevard and a 15-story building located along Wilcox Avenue, as well as the rehabilitation of the Attie Building. The proposed 15-story building would be set back south of Hollywood Boulevard by at least 145 feet. This development would include excavations up to approximately 40 feet below ground surface requiring the use of soldier pile shoring with tie-backs. Drilling of the soldier piles and tie backs will penetrate firm soil and no hard rock or indurated layers are anticipated. Therefore, vibration would be minimal. Additionally, the tieback should not exceed 30-50 feet, staying well away from Hollywood Boulevard. Given the separation from Hollywood Boulevard, the impact on the Metro B (Red) Line is anticipated to be negligible. The new one-story building along Hollywood Boulevard would replace a similar building. Therefore the net change in loading would be minimal and impacts on the Metro B (Red) Line would be negligible. The rehabilitation of the Attie Building would have no change to the underlying soils and would not be expected to impact the Metro B (Red) Line. Impacts would be less than significant and no mitigation measures are required. (See Geotechnical Memorandum, Appendix FEIR-2, of this Final EIR.)

Comment No. 2-8

- a. Technical Review: The Applicant shall submit for Metro's review all architectural plans, engineering drawings and calculations, and construction work plans and methods, including any crane placement and radius, to evaluate any impacts to Metro B Line (Red) infrastructure in relationship to the Project. Before issuance of any building permit for the Project, the Applicant shall obtain Metro's approval of final construction plans.

Response to Comment No. 2-8

This comment states that the Applicant will submit all architectural plans, engineering drawings and calculations, and construction work plans and methods, including any crane placement and radius to Metro for review. The Applicant will comply with all Metro review requirements.

Comment No. 2-9

- b. Construction Safety: The construction and operation of the Project shall not disrupt the operation and maintenance activities of the Metro B Line (Red) or the structural

and systems integrity of Metro's tunnels. Not later than one month before Project construction, the Applicant shall contact Metro to schedule a pre-construction meeting with all Project construction personnel and Metro Real Estate, Construction Management, and Construction Safety staff. During Project construction, the Applicant shall:

- i. Work in close coordination with Metro to ensure that station access, visibility, and structural integrity are not compromised by construction activity or permanent build conditions;
- ii. Notify Metro of any changes to construction activity that may impact the use of the ROW;
- iii. Permit Metro staff to monitor construction activities to ascertain any impact to the B Line (Red) ROW.

Response to Comment No. 2-9

This comment outlines construction safety requirements for work near the Metro right-of-way. The Applicant will comply with all applicable Metro safety and inspection requirements. In addition, a Construction Traffic Management Plan would be implemented pursuant to Project Design Feature TR-PDF-1.

Comment No. 2-10

- c. Right of Way (ROW) Entry Permit: For temporary or ongoing access to Metro ROW for any construction, and/or maintenance activities, the Applicant shall complete Metro's Track Allocation process with Metro Rail Operations and obtain a Right of Entry Permit from Metro Real Estate. Approval for single tracking or a power shutdown, while possible, is highly discouraged; if sought, the Applicant shall apply for and obtain such approval not later than two months before the start of Project construction. The Applicant shall apply for and obtain approval for any special operations, including the use of a pile driver or any other equipment that could come in close proximity or encroach on the tunnels or related structures, not later than one month before the start of Project construction.

Response to Comment No. 2-10

This comment outlines permitting requirements to gain entry to Metro's right-of-way. Currently, it is not anticipated that access to the Metro right-of-way would be required. However, if circumstances change and access is required, the Applicant will comply with Metro permitting requirements.

Comment No. 2-11

- d. Noise & Vibration: The Applicant shall record a Noise Easement Deed in favor of Metro before issuance of any Certificate of Occupancy for the Project. The easement recorded in the Deed shall extend to successors and tenants. The applicant shall provide the original recorded Noise Easement Deed to Metro.

Response to Comment No. 2-11

The comment does not raise any issues regarding environmental impacts of the Project, but instead implies that Metro's facilities may generate noise and vibration since the B (Red) Line subway runs near to the Project Site. Execution of a Noise Easement Deed, as suggested by Metro, would not address an environmental effect of the Project, but would rather address an effect of the existing environment (i.e., operation of the Metro B (Red) Line) on the Project. CEQA does not require that public agencies analyze the impact that existing environmental conditions might have on a project's future users or residents, according to the California Supreme Court's decision in *California Building Industry Association v Bay Area Air Quality Management District*. Moreover, as indicated in Response to Comment No. 2-5, above, the Project would not result in significant impacts to the existing transit system. As also noted in Response to Comment No. 2-9, above, the Applicant will comply with all applicable Metro safety and inspection requirements. In addition, a Construction Traffic Management Plan would be implemented pursuant to Project Design Feature TR-PDF-1. The comment is noted for the administrative record and will be forwarded to the decision-makers for review and consideration.

Comment No. 2-12

3. Advisories to Applicant: The Applicant is encouraged to contact the Metro Development Review Team early in the design process to address potential impacts. The Applicant should also be advised of the following:
 - a. Occupational Safety and Health Administration (OSHA) Requirements: Construction and/or excavation work in proximity to Metro right-of-way (ROW) with potential to damage subway tracks and related infrastructure may be subject to additional OSHA safety requirements.
 - b. Technical Review: Metro charges for staff time spent on engineering review and construction monitoring.
 - c. Cost of Impacts: The Applicant will be responsible for costs incurred by Metro resulting from Project construction/operation issues that cause delay or harm to Metro service delivery or infrastructure, including single-tracking or bus bridging around closures. The Applicant will also bear all costs for any noise mitigation required for the Project.

Response to Comment No. 2-12

This comment advises the Applicant that construction workers may be subject to additional OSHA requirements, Metro's fees for engineering review and monitoring, and the Applicant's financial responsibility for any issues with Metro's service or infrastructure as a result of the Project. The Applicant will comply with all applicable requirements.

Comment No. 2-13**Transit Supportive Planning: Recommendations and Resources**

Considering the Project's proximity to the Hollywood and Vine Station, Metro would like to identify the potential synergies associated with transit-oriented development:

1. Transit Supportive Planning Toolkit: Metro strongly recommends that the Applicant review the Transit Supportive Planning Toolkit which identifies 10 elements of transit-supportive places and, applied collectively, has been shown to reduce vehicle miles traveled by establishing community-scaled density, diverse land use mix, combination of affordable housing, and infrastructure projects for pedestrians, bicyclists, and people of all ages and abilities. This resource is available at <https://www.metro.net/projects/tod-toolkit>.

Response to Comment No. 2-13

This comment provides a link to Metro's Transit Supportive Planning Toolkit. The Project already includes many measures to reduce VMT including its location near the Hollywood/Vine Station, improvements to the streetscape along Hollywood Boulevard and Wilcox Avenue, and the TDM program included as Project Design Feature TR-PDF-2. This comment is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment No. 2-14

2. Land Use: Metro supports development of commercial and residential properties near transit stations and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments. Metro encourages the City and Applicant to be mindful of the Project's proximity to the Hollywood and Vine Station, including orienting pedestrian pathways towards the station.

Response to Comment No. 2-14

This comment does not raise any issues regarding environmental impacts of the Project. This comment encourages the City and Applicant to be mindful of the Project's

proximity to the Hollywood/Vine Station. Because the station is approximately 0.25 mile east of the Project Site, the Project does not provide direct access, but the Project provides pedestrian oriented design and facilitates use of existing public sidewalks with direct access to the station. Additionally, the Project will enhance pedestrian activity along Hollywood Boulevard and Wilcox Avenue through building design and proposed streetscape amenities by providing ground-level, community-serving retail and restaurant use. Streetscape amenities provided by the Project would include a row of street trees on Wilcox Avenue, pedestrian-scale lighting fixtures and elements, and landscaped outdoor seating areas. This comment is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment No. 2-15

3. Transit Connections and Access: Metro strongly encourages the Applicant to install Project features that help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the Project site and nearby destinations. The City should consider requiring the installation of such features as part of the conditions of approval for the Project, including:
 - a. Walkability: The provision of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks with ADA-compliant curb ramps, and other amenities along all public street frontages of the development site to improve pedestrian safety and comfort to access the nearby bus stops and rail station.

Response to Comment No. 2-15

This comment encourages improvements to access and the pedestrian realm along the Project Site's frontages. As discussed above in Response to Comment No. 2-14, the Project would enhance pedestrian activity along Hollywood Boulevard and Wilcox Avenue through building design and proposed streetscape amenities by providing ground-level, community-serving retail and restaurant use. Streetscape amenities provided by the Project would include a row of street trees on Wilcox Avenue, pedestrian-scale lighting fixtures and elements, and landscaped outdoor seating areas. This comment is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment No. 2-16

- b. Bicycle Use and Micromobility Devices: The provision of adequate short-term bicycle parking, such as ground-level bicycle racks, and secure, access-controlled, enclosed long-term bicycle parking for residents, employees, and guests. Bicycle parking facilities should be designed with best practices in mind, including highly visible siting, effective surveillance, ease to locate, and equipment installation with preferred spacing dimensions, so bicycle parking can be safely and conveniently accessed. Similar provisions for micro-mobility devices are also encouraged. The

Applicant should also coordinate with the Metro Bike Share program for a potential Bike Share station at this development.

Response to Comment No. 2-16

This comment does not raise any issues regarding environmental impacts of the Project. This comment encourages the provision of bicycle facilities. The Project would include short- and long-term bicycle parking, in accordance with LAMC requirements. The Project includes 269 long-term spaces and 35 short-term spaces for both residential and commercial uses. Both short-term and long-term bicycle parking would be located on Level 1. The comment also encourages the Applicant to coordinate with Metro to develop a potential bike share station on the Project Site. While a bike share station is not currently proposed, one possible component of the Project's TDM program prepared pursuant to Project Design Feature TR-PDF-2 is a contribution to the City's Bicycle Trust Fund for implementation of bicycle improvements in the Project area. This comment is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment No. 2-17

- c. First & Last Mile Access: The Project should address first-last mile connections to transit and is encouraged to support these connections with wayfinding signage inclusive of all modes of transportation. For reference, please review the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at: http://media.metro.net/docs/sustainability_path_design_guidelines.pdf

Response to Comment No. 2-17

This comment encourages the Project to address first-last mile connections to transit. First-last mile strategies, such as a Transportation Information Center and bicycle facilities, are proposed as part of the Project's TDM program prepared pursuant to Project Design Feature TR-PDF-2. Additionally, as discussed above in Response to Comment No. 2-14, the Project would enhance the pedestrian activity along Hollywood Boulevard and Wilcox Avenue with streetscape improvements.

Comment No. 2-18

4. Parking: Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements and the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand.

Response to Comment No. 2-18

This comment encourages a reduction in parking. In accordance with LAMC requirements, the Project would provide a total of 420 vehicular parking spaces, including 387 spaces for the residential units and 33 spaces for the community-serving retail and restaurant uses. The vehicular parking provided accounts for a permitted 10-percent reduction, pursuant to the Los Angeles Bicycle Parking Ordinance.¹ Additionally, as part of the Project's Assembly Bill (AB) 900 commitment, residential parking would be unbundled with the exception of the workforce housing units.

Comment No. 2-19

5. Wayfinding: Any temporary or permanent wayfinding signage with content referencing Metro services or featuring the Metro brand and/or associated graphics (such as Metro Bus or Rail pictograms) requires review and approval by Metro Signage and Environmental Graphic Design.

Response to Comment No. 2-19

This comment informs the Applicant that any wayfinding signage referencing Metro or including its logo is subject to review and approval. The Applicant will comply with all applicable review requirements.

Comment No. 2-20

6. Transit Pass Programs: Metro would like to inform the Applicant of Metro's employer transit pass programs, including the Annual Transit Access Pass (A-TAP), the Employer Pass Program (E-Pass), and Small Employer Pass (SEP) Program. These programs offer efficiencies and group rates that businesses can offer employees as an incentive to utilize public transit. The A-TAP can also be used for residential projects. For more information on these programs, please visit the programs' website at <https://www.metro.net/riding/eapp/>.

Response to Comment No. 2-20

This comment, which informs the Applicant of Metro's employer transit pass programs, is noted for the record.

¹ Ordinance No. 185480 adopted in May 2018 does not apply to the Project because the Project application was deemed complete prior to its adoption. Ordinance No. 182386 applies to the Project.

Comment No. 2-21

If you have any questions regarding this letter, please contact me by phone at 213-922-2671, by email at DevReview@metro.net, or by mail at the following address:

Metro Development Review
One Gateway Plaza
MS 99-22-1
Los Angeles, CA 90012-2952

Response to Comment No. 2-21

This comment, which concludes the letter and provides a point of contact, is noted for the record.

Comment Letter No. 3

Miya Edmonson
IGR/CEQA Branch Chief
Caltrans District 7
100 S. Main St., MS 16
Los Angeles, CA 90012-3721

Comment No. 3-1

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced DEIR. The proposed project is an infill, mixed-use development comprised of 260 multi-family dwelling units and approximately 17,800 square feet (SF) of commercial uses on a 1.4-acre project site within the City of Los Angeles. Up to 10% of the dwelling units would be set aside for workforce housing. Upon completion, the Project would include approximately 278,892 SF of floor area, inclusive of the 9,000-SF existing Attie Building, with a maximum floor area ratio (FAR) of up to 4.5:1. Approximately 420 parking spaces would be provided, which accounts for a 10% reduction, pursuant to the Los Angeles Bicycle Parking Ordinance. The Project is an Environmental Leadership Development Project under Assembly Bill 900, certified by the Governor on October 10, 2019. The City of Los Angeles is considered the Lead Agency under the California Environmental Quality Act (CEQA).

The nearest State facilities to the proposed project are the United States 101 (US-101) and State Route 2 (SR-2), which is also known as Santa Monica Boulevard. The US-101 at Cahuenga Boulevard is located approximately 2,200 feet away from the project, and the SR-2 at Wilcox Avenue is located approximately 4,000 feet away from the project.

Regarding transit access, the project is located approximately .25 miles away from the Metro Red Line Hollywood/Vine station, and approximately 2,500 feet away from the Metro Red Line Hollywood/Highland Station. This means that the project is located in a Transit Priority Area (TPA) per the Technical Advisory on Evaluating Transportation Impacts in CEQA by the California Governor's Office of Planning and Research (OPR), dated December 2018. There are also several bus lines with stops along Hollywood Boulevard near the project site. Specifically, there are eight Metro local lines, 3 DASH lines, and one LADOT Commuter Express line that have stops near the project site.

In terms of active transportation facilities serving the project, there are sidewalks along Hollywood Boulevard and Wilcox Avenue. The project also involves implementing streetscape amenities, such as a row of street trees on Wilcox Avenue, pedestrian-scale lighting, and landscaped outdoor seating areas. As discussed in the DEIR, while there are no dedicated bicycle facilities in the immediate vicinity of the project site, there are a limited

number of Class II and Class III bicycle facilities in the study area. Also, the project will offer 304 bicycle parking spaces.

Response to Comment No. 3-1

This introductory comment, which summarizes the project description and location, is noted for the record.

Comment No. 3-2

Caltrans initially commented on the Notice of Preparation for this project in June 2017. Since then, the City of Los Angeles has adopted a Vehicle Miles Traveled (VMT) metric for transportation analysis, in accordance with Senate Bill 743 (2013). This bill mandates that VMT be used as the primary metric in identifying transportation impacts of all future development projects under CEQA, starting July 1, 2020. In light of the City's early adoption of VMT, Caltrans has reviewed this project based on the 2018 OPR Technical Advisory on Evaluating Transportation Impacts in CEQA. According to these guidelines, this project is presumed to have a less than significant impact because it is located in a TPA, and meets the following criteria:

- Has a floor area ratio of more than 0.75
- Does not include more parking than required by the local permitting agency
- Is consistent with the region's Sustainable Communities Strategy
- Does not replace affordable residential units with a smaller number of moderate- or high-income residential units

Response to Comment No. 3-2

This comment states that the Project was reviewed based on the 2018 OPR Technical Advisory on Evaluating Transportation Impacts in CEQA and states that the Project is presumed to have a less than significant transportation impact because it is located within a TPA. This conclusion is consistent with the VMT analysis conducted for the Project which was approved by LADOT. See Draft EIR Section IV.I, Transportation and Draft EIR Appendices O.2 and O.4. This comment is noted for the record and will be forwarded to the decision makers for review and consideration.

Comment No. 3-3

In addition, Caltrans does not have any safety concerns with this project. However, if any of the following proposed transportation-related Project Design Features will be

implemented in or near Caltrans right-of-way, please inform Caltrans for its review and approval.

- **TR-PDF-1:** Preparation of a Construction Traffic Management Plan
- **TR-PDF-2:** Implementation of a Transportation Demand Management Program
- **TR-PDF-3:** Contribution toward Transportation Systems Management Improvements

Response to Comment No. 3-3

This comment requests an opportunity for Caltrans review of any Project Design Features that will be implemented in or near the Caltrans right-of-way. Project Design Features TR-PDF-1, TR-PDF-2, and TR-PDF-3 will not be implemented near the Caltrans right-of-way.

Comment No. 3-4

The following information is included for your consideration.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Furthermore, Caltrans encourages the Lead Agency to integrate transportation and land use in a way that reduces Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions, as well as facilitates a high level of non-motorized travel and transit use. Thus, Caltrans supports the Transportation Demand Management (TDM) strategies this project has incorporated, such as preparing a TDM program, providing pedestrian lighting, and widening a portion of Wilcox Avenue by five feet. Additional TDM strategies that the City of Los Angeles can consider integrating into this project include:

- Provide transit passes to residents and employees to encourage them to utilize nearby transit services.
- In addition to providing parking incentives, all parking should be priced appropriately, and unbundled from residential leasing agreements.
- Provide showers, lockers, and an on-site bike repair room to residents and employees, to support a mobility hub and decrease barriers to cycling.
- Improve bus stops adjacent to the site, such as by providing a bench at the bus stop on the southwest corner of Hollywood Boulevard and Wilcox Avenue.
- Enhance bicycle facilities on Wilcox Avenue and Selma Avenue to create safer and more comfortable environments for people on bikes.

- Ensure that the portion of sidewalk that will be widened on Wilcox Avenue meets ADA requirements after it is widened.

Please make every attempt to reduce VMT.

Response to Comment No. 3-4

This comment encourages the use of TDM measures to reduce VMT and GHG emissions. The comment includes some public right of way improvements which are outside the scope of the Project. As discussed in Section IV.I, Transportation, of the Draft EIR, as part of its commitment under AB 900 and required by LADOT's December 2019 assessment letter, the Project will prepare and implement a TDM program to reduce peak hour vehicle traffic to and from the Project Site by 15 percent. The TDM program, included as Project Design Feature TR-PDF-2, would promote non-automobile travel and reduce the use of single-occupant vehicle trips with a comprehensive program of design features, transportation services, education programs, and incentive programs. These strategies can include, but are not necessarily limited to, the following:

- Transportation Information Center, educational programs, kiosks, and/or other measures;
- Promotion and support of carpools and rideshare;
- Bicycle amenities such as racks;
- Parking incentives and support for formation of carpools/vanpools;
- On-site TDM coordinator;
- Mobility hub support;
- Contribution to the City's Bicycle Trust Fund for implementation of bicycle improvements in the Project area; and
- Participation as a member in the future Hollywood Community Transportation Management Organization (TMO), when operational.

Comment No. 3-5

As a reminder, any transportation of heavy construction equipment or materials that requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. If construction traffic is expected to cause delays on any State facilities, including the US-101, please submit the Construction Traffic Management Plan detailing these delays for Caltrans' review. Caltrans supports the measure in this plan to

require construction-related traffic, including truck haul trips, to be scheduled outside of commuter peak hours to the extent possible.

Response to Comment No. 3-5

The comment states that transportation of heavy equipment and/or oversized vehicles on State highways requires a permit from Caltrans and Caltrans supports that construction related traffic be limited to off-peak commute periods to the extent possible. The Project will comply with any Caltrans permit requirements regarding transportation of equipment or materials. This comment is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment No. 3-6

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at Emily.Gibson@dot.ca.gov, and refer to GTS# 07-LA-2017-03173.

Response to Comment No. 3-6

This comment, which concludes the letter and provides a point of contact, is noted for the record.

Comment Letter No. 4

Ali Poosti
Division Manager
Wastewater Engineering Services Division
LA Sanitation and Environment

Comment No. 4-1

This is in response to your February 27, 2020 Notice of Completion and Availability of Draft Environmental Impact Report for the proposed mixed-use project located at 6430–6440 W Hollywood Blvd and N 1624–1648 N Wilcox Ave, Los Angeles, CA 90028. LA Sanitation, Wastewater Engineering Services Division has received and logged the notification. Upon review it has been determined that there were no changes to the project and thus, the previous response that was sent on July 5, 2017 is still valid. Please notify our office in the instance that additional environmental review is necessary for this project.

If you have any questions, please call Christopher DeMonbrun at (323) 342-1567 or email at chris.demonbrun@lacity.org

Response to Comment No. 4-1

This comment, which states that LA Sanitation has no additional comments on the Project, is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment Letter No. 5

Alex Campbell
Assistant CEQA Project Manager
Los Angeles Unified School District
333 S. Beaudry Ave, Fl. 21
Los Angeles, CA 90017-1466

Comment No. 5-1

Presented below are comments submitted on behalf of the Los Angeles Unified School District (LAUSD) regarding the project located at 6436 Hollywood Boulevard.

Based on the extent/location of the proposed development, it is our opinion that significant environmental impacts on the surrounding community (traffic, pedestrian safety) will occur. Due to the fact that Selma Elementary School is located approximately 700 ft. from the proposed project site, LAUSD is concerned about the potential negative impacts of the development to our students, staff and parents traveling to and from the referenced campuses. Since the project will have a significant impact on LAUSD schools, mitigation measures designed to help reduce or eliminate such impacts are included in this response.

Response to Comment No. 5-1

This comment expresses the commenter's belief that the Project would have a significant impact on LAUSD schools. As discussed in Section IV.H.3, Public Services—Schools, of this Draft EIR, impacts on LAUSD schools would be less than significant. Specific issues raised by the commenter are addressed in Response to Comment Nos. 5-2 through 5-16, below. As discussed therein, no new significant impacts were identified.

Comment No. 5-2**Traffic/Transportation**

LAUSD's Transportation Branch **must be contacted** at (213) 580-2950 regarding the potential impact upon existing school bus routes. The Project Manager or designee will have to notify the LAUSD Transportation Branch of the expected start and ending dates for various portions of the project that may affect traffic within nearby school areas. To ensure that effective mitigations are employed to reduce construction and operation related transportation impacts on District sites, we ask that the following language be included in the mitigation measures for traffic impacts:

Response to Comment No. 5-2

This comment states that the Applicant is required to coordinate with LAUSD's Transportation Branch regarding school bus routes. The Applicant will adhere to all applicable LAUSD requirements if necessary and to the extent feasible; however, as no significant impacts are anticipated and there is no evidence of such, the following mitigation measures suggested by the commenter will not be added to the Project mitigation measures.

Comment No. 5-3

- During the construction phase, truck traffic and construction vehicles may not cause traffic delays for our transported students.

Response to Comment No. 5-3

Per SB 743, vehicle delay is no longer considered an impact within CEQA review. Nonetheless, the Project includes Project Design Feature TR-PDF-1 which requires the preparation of a Construction Traffic Management Plan for LADOT review and approval. The Construction Traffic Management Plan is intended to facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians, and includes the following measures:

- Maintaining access for land uses in the vicinity of the Project Site during construction;
- Temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities adjacent to Wilcox Avenue, to ensure traffic safety on public rights-of-way;
- Schedule construction material deliveries during off-peak periods to the extent practical;
- Organize Project Site deliveries and the staging of all equipment and materials in the most efficient manner possible, and on-site where possible, to avoid an impact to the surrounding roadways;
- Coordinate truck activity and deliveries to ensure trucks do not wait to unload or load at the Project Site and impact roadway traffic, and if needed, utilize an organized off-site staging area;
- Control truck and vehicle access to the Project Site with flagmen;
- Limit sidewalk and lane closures to the maximum extent possible, and avoid peak hours to the extent possible. Where such closures are necessary, the

Project's Worksite Traffic Control Plan will identify the location of any sidewalk or lane closures and identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity; and/or

- Parking for construction workers will be provided either on-site or at off-site, off-street locations.

Therefore, even though vehicle delay is no longer considered an impact within CEQA review as per SB 743, the Project would not cause traffic delays for LAUSD students. As no significant impacts are anticipated and there is no evidence of such, the suggested mitigation measure will not be added to the Project mitigation measures.

Comment No. 5-4

- During and after construction changed traffic patterns, lane adjustment, traffic light patterns, and altered bus stops may not affect school buses' on-time performance and passenger safety.

Response to Comment No. 5-4

The Project would not result in changed traffic patterns, lane adjustments, traffic light patterns, or altered bus stops and, therefore, would not affect school buses' on-time performance and passenger safety. As no significant impacts are anticipated and there is no evidence of such, the suggested mitigation measure will not be added to the Project mitigation measures.

Comment No. 5-5

- Construction trucks and other vehicles are required to stop when encountering school buses using red-flashing-lights must-stop-indicators per the California Vehicle Code.

Response to Comment No. 5-5

Drivers of all vehicles in California, including construction trucks and vehicles, are required to adhere to the California Vehicle Code. As no significant impacts are anticipated and there is no evidence of such, the suggested mitigation measure will not be added to the Project mitigation measures.

Comment No. 5-6

- Contractors must install and maintain appropriate traffic controls (signs and signals) to ensure vehicular safety.

Response to Comment No. 5-6

All appropriate traffic controls are provided for under Project Design Feature TR-PDF-1 which requires the preparation of a Construction Traffic Management Plan for LADOT review and approval. Refer to Response to Comment No. 5-3, above. As no significant impacts are anticipated and there is no evidence of such, the suggested mitigation measure will not be added to the Project mitigation measures.

Comment No. 5-7

- Contractors must maintain ongoing communication with LAUSD school administrators, providing sufficient notice to forewarn children and parents when existing vehicle routes to school may be impacted.

Response to Comment No. 5-7

As discussed above in Response to Comment No. 5-2, the Applicant would adhere to all applicable requirements including notification in the event of any street closures if necessary and to the extent feasible; however, as no significant impacts are anticipated and there is no evidence of such, the mitigation measure suggested by the commenter will not be added to the Project mitigation measures.

Comment No. 5-8**Pedestrian Safety**

Construction activities that include street closures, the presence of heavy equipment and increased truck trips to haul materials on and off the project site can lead to safety hazards for people walking in the vicinity of the construction site. To ensure that effective mitigations are employed to reduce construction and operation related pedestrian safety impacts on District sites, we ask that the following language be included in the mitigation measures for pedestrian safety impacts:

Response to Comment No. 5-8

Refer to Response to Comment No. 5-3, above. As discussed therein, the Project would include a Construction Traffic Management Plan which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. As no significant impacts are anticipated and there is no evidence of such, the following mitigation measures suggested by the commenter will not be added to the Project mitigation measures.

Comment No. 5-9

- Contractors must maintain ongoing communication with LAUSD school administrators, providing sufficient notice to forewarn children and parents when existing pedestrian routes to school may be impacted.

Response to Comment No. 5-9

Refer to Response to Comment Nos. 5-2, 5-3, and 5-7, above. As no significant impacts are anticipated and there is no evidence of such, the suggested mitigation measure will not be added to the Project mitigation measures.

Comment No. 5-10

- Contractors must maintain safe and convenient pedestrian routes to all nearby schools. The District will provide School Pedestrian Route Maps upon your request.

Response to Comment No. 5-10

Refer to Response to Comment Nos. 5-2, 5-3, and 5-7, above. As no significant impacts are anticipated and there is no evidence of such, the suggested mitigation measure will not be added to the Project mitigation measures.

Comment No. 5-11

- Contractors must install and maintain appropriate traffic controls (signs and signals) to ensure pedestrian and vehicular safety.

Response to Comment No. 5-11

Refer to Response to Comment Nos. 5-2, 5-3, and 5-7, above. As no significant impacts are anticipated and there is no evidence of such, the suggested mitigation measure will not be added to the Project mitigation measures.

Comment No. 5-12

- Haul routes are not to pass by **any** school, except when school is **not** in session.

Response to Comment No. 5-12

The Project's proposed haul route includes travel to and from the Hollywood Freeway along Highland Avenue, Cahuenga Boulevard, and Hollywood Boulevard, and does not pass by any LAUSD school facilities. As no significant impacts are anticipated

and there is no evidence of such, the suggested mitigation measure will not be added to the Project mitigation measures.

Comment No. 5-13

- No staging or parking of construction-related vehicles, including worker-transport vehicles, will occur on or adjacent to a school property.

Response to Comment No. 5-13

No staging or parking of Project construction vehicles will take place on or adjacent to school property as the closest school is approximately 700 feet away. Refer to Response to Comment Nos. 5-2, 5-3, and 5-7, above. As no significant impacts are anticipated and there is no evidence of such, the suggested mitigation measure will not be added to the Project mitigation measures.

Comment No. 5-14

- Funding for crossing guards at the contractor's expense is required when safety of children may be compromised by construction-related activities at impacted school crossings.

Response to Comment No. 5-14

Refer to Response to Comment Nos. 5-2, 5-3, and 5-7, above. As no significant impacts are anticipated and there is no evidence of such, the suggested mitigation measure will not be added to the Project mitigation measures.

Comment No. 5-15

- Barriers and/or fencing must be installed to secure construction equipment and to minimize trespassing, vandalism, short-cut attractions, and attractive nuisances.

Response to Comment No. 5-15

As discussed in Section IV.H.2, Public Services—Police Protection, of this Draft EIR, the Project would include Project Design Feature POL-PDF-1 which requires implementation of temporary security measures including security fencing, lighting, and locked entry during construction. As no significant impacts are anticipated and there is no evidence of such, the suggested mitigation measure will not be added to the Project mitigation measures.

Comment No. 5-16

- Contractor's [sic] are required to provide security patrols (at their expense) to minimize trespassing, vandalism, and short-cut attractions.

Response to Comment No. 5-16

The Project does not currently propose security patrols during construction. However, as discussed above in Response to Comment No. 5-15, the Project would include Project Design Feature POL-PDF-1 which requires implementation of temporary security measures including security fencing, lighting, and locked entry during construction. Should additional security measures become necessary, they will be implemented as needed. As no significant impacts are anticipated and there is no evidence of such, the suggested mitigation measure will not be added to the Project mitigation measures.

Comment No. 5-17

The District's charge is to protect the health and safety of students and staff, and the integrity of the learning environment. The comments presented above identify potential environmental impacts related to the proposed project that must be addressed to ensure the welfare of the students attending Selma Elementary School their teachers and the staff, as well as to assuage the concerns of the parents of these students. Therefore, the measures set forth in these comments should be adopted as conditions of project approval to offset unmitigated impacts on the affected school students and staff.

Response to Comment No. 5-17

As discussed above in Response to Comment Nos. 5-2 through 5-16, the Draft EIR adequately addressed all of the issues raised by the commenter. No new significant impacts were identified and there are no unmitigated impacts to any school facility. As such, the suggested measures do not need to be made conditions or approval or be added to the Project mitigation measures.

Comment No. 5-18

Thank you for your attention to this matter. If you need additional information please contact me at (213) 241-4210.

Response to Comment No. 5-18

This comment, which concludes the letter and provides a contact number, is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment Letter No. 6

Richard Adkins
President
Hollywood Heritage, Inc.
P.O. Box 2586
Hollywood, CA 90078-2586

Comment No. 6-1

Hollywood Heritage has a keen interest in the preservation of our City's important architectural history and is responding to your Draft EIR with detailed comments. Our central concern is with the long-term preservation of Hollywood Boulevard's National Register Commercial and Entertainment Historic District, and the 4 specific effects the proposed project has on it:

Response to Comment No. 6-1

This introductory comment is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment No. 6-2

1. **Attie Building restoration** (6436–40 Hollywood Bl. and 1646–48 Wilcox): While the DEIR provides a well-researched historical background, the resulting design proposal for the storefronts is insufficiently researched and inappropriate, but correctable.

Specific actions to ensure appropriate follow-through must be added to the project Conditions. See Attachment #1

Response to Comment No. 6-2

The design for storefronts at the Attie Building was based on historic photographs from the period of significance, 1931–1939, and physical evidence, in conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Secretary's Standards).² Specifically, as fully described in the Draft EIR and accompanying Cultural Resources Report (see Draft EIR, Section IV.B, Cultural Resources, page IV.B-34 and Draft EIR Appendix D.1, Cultural Resources Report, page 33), design of the storefronts

² See also Jenna Snow, *Memorandum Re: Responses to Hollywood Heritage Comments, June 30, 2020, Appendix FEIR-3 to this Final EIR*. Ms. Snow's Memorandum was used throughout for the preparation of the responses to Comment Letter 6, as well as Comment Letters 7 & 8.

conforms with Rehabilitation Standard 3, which states that: “Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.” The design does not incorporate features from different buildings or designs from different time periods, which would not be in conformance with Rehabilitation Standard 3. Furthermore, design of the storefronts conforms with Rehabilitation Standard 6, which states that “replacement of missing features will be substantiated by documentary and physical evidence.” This comment is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment No. 6-3

2. **National Register District building demolition/new building** (6430–6434 Hollywood) (a non-contributor) without the requisite Historic Assessment. The DEIR conclusions that non-contributors by definition have no significance comes from a misunderstanding of District composition. Replacement by a new building which does not comply with the Secretary of the Interior Standards, Preservation Brief #14, or the Hollywood Boulevard Urban Design Plan and other guidelines, is a significant adverse effect unless corrected.

Correction of the design is necessary to avoid significant adverse effect; specific actions to ensure appropriate follow-through must be added to the project Conditions. See Attachment #2

Response to Comment No. 6-3

The Draft EIR and accompanying Cultural Resources Report (see Draft EIR, Section IV.B, Cultural Resources, pages IV.B-22–23, IV.B-27, and IV.B.34–35, and Draft EIR Appendix D.1, Cultural Resources Report, pages 19–22) provides an analysis of 6430–6434 Hollywood Boulevard and found it ineligible as a contributing resource to the Hollywood Boulevard Commercial and Entertainment Historic District (Hollywood Boulevard historic district). The Building was also determined to be a non-contributor by the Keeper of the National Register. Although initially constructed in 1931, due to multiple and substantial alterations, the building at 6430–6434 Hollywood Boulevard does not retain any semblance to how it looked when constructed, or from any other date during the period of significance for the Hollywood Boulevard historic district.

National Register Bulletin 15: *How to Apply the National Register Criteria for Evaluation* notes that “the majority of the components that add to the district’s historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole.” Even though 6430–6434 Hollywood Boulevard was initially constructed during the historic district’s period of significance, it does not retain integrity and therefore does not add to the Hollywood Boulevard historic district’s historic character.

Demolition of a non-contributing resource is not an impact to a historic district. Replacement of an existing non-contributor with an infill non-contributor does not affect district composition or integrity per se. Guidance from the National Park Service states, “National Register listing does not mean that a building or district is frozen in time and that no change can be made without compromising the historical significance.”³

An evaluation of how the proposed new building on Hollywood Boulevard conforms with the *Secretary’s Standards* is provided in the Draft EIR and accompanying Cultural Resources Report (see Draft EIR, Section IV.B, Cultural Resources, pages IV.B-34–35 and Draft EIR Appendix D.1, Cultural Resources Report, pages 33–34). *Preservation Brief 14: New Exterior Additions to Historic Buildings: Preservation Concerns*, expands on Rehabilitation Standards 9 and 10, two of the 10 rehabilitation standards that deal specifically with additions. Revised in 2010, Preservation Brief 14 includes guidance for new additions in densely built urban environments, such as Hollywood Boulevard. The guidance states:

Treating the addition as a separate or infill building may be the best approach when designing an addition that will have the least impact on the historic building and the district. In these instances there may be no need for a direct visual link to the historic building. Height and setback from the street should generally be consistent with those of the historic building and other surrounding buildings in the district.

The proposed new building at 6430–6434 Hollywood Boulevard meets guidance in Preservation Brief 14. As described in the DEIR and accompanying Cultural Resources Report (see Draft EIR pages IV.B-34–35 and Appendix D.1, pages 33–34), the new building is proposed to be compatible with surrounding retail buildings, specifically the adjacent Attie Building, in size, scale, proportion, and massing. As the proposed new building conforms with the *Secretary’s Standards*, including additional guidance provided in Preservation Brief 14, it does not result in material impairment to the Hollywood Boulevard historic district, the identified historical resource.

Additionally, the advisory *Draft—Hollywood Boulevard District Urban Design Plan*, has not been formally adopted or ratified, nor is its express purpose or function to act as a barometer of suitability of development within the Historic District, but rather defers to the *Secretary’s Standards* to determine eligibility and guide development adjacent to historic resources. As the plan was not finalized nor adopted, the plan relies on *Secretary’s*

³ Anne E. Grimmer and Kay D. Weeks, *Preservation Brief 14: New Exterior Additions to Historic Buildings: Preservation Concerns*, (Washington, DC: U.S. Department of the Interior, National Park Service, 2010), p. 1.

Standards, and there are no provisions or specifics which would constitute an impact on any historic resources based on non-conformity, the commenter's contention of impacts based on the plan is not supported by evidence. The Project would further comply with *Secretary's Standards*, for both restoration and new construction.

This comment is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment No. 6-4

3. **Incompatible new project construction:** with significant adverse effects within the area of the Hollywood Boulevard Urban Design District and adjacent to the National Register District—which does not conform with design requirements or with zoning.
 - a. **Incompatible and Oversize:** The project at over twice the allowed size looms over the National Register Historic District, with incompatible materials, 3 levels of above grade parking, with incompatible height—having adverse effects on that District. The proposed density exceeds that allowed anywhere in the Community Plan; does not meet Redevelopment Plan requirements for excess density; does not “pass the test” required in removing current zoning “D” conditions.

The project design must be corrected to avoid significant adverse effect. See Attachment #3

Response to Comment No. 6-4

The Draft EIR and accompanying Cultural Resources Report assesses potential indirect impacts to the setting of the Hollywood Boulevard historic district (see Draft EIR, Section IV.B, Cultural Resources, pages IV.B-35–37 and Appendix D.1, Cultural Resources Report, pages 34–35). CEQA describes an *indirect* impact as one that results from the “...alteration of the resource or *its immediate surroundings* such that the significance of an historical resource would be materially impaired” (emphasis added—CEQA Guidelines §15064.5(b)(1)).

As thoroughly described in the Draft EIR and accompanying Cultural Resources Report (see Draft EIR, Section IV.B, Cultural Resources, pages IV.B-35–37 and Appendix D.1, Cultural Resources Report, pages 34–35), the proposed new building does not “loom over the National Register Historic District.” Hollywood Boulevard predominately consists of commercial buildings that vary greatly in height, from one to 12 stories. As a result of the slope of the topography down to the south, the proposed new building will not appear taller than surrounding buildings and will not alter the varied pattern of building heights in the area. Given the variations in height, as well as the presence of taller buildings within

and adjacent to the Hollywood Boulevard historic district, the proposed new building will not materially impair the setting of the Hollywood Boulevard historic district.

The comment includes additional assertions related to compliance with the height, parking, density, “D” Limitation, and other entitlement related concerns. These are not in the purview of environmental review, but to the extent any impacts could occur due to land use conflicts, these have been discussed in the Draft EIR. Additionally, as discussed above, the historic impacts have been fully analyzed in the Draft EIR. The comment will be forwarded to the Decision Makers for their consideration.

Comment No. 6-5

- b. **Direct effect on Mark Twain Hotel:** The insensitive design of the proposed above-grade parking and the demolition of the current buildings north of 1622 Wilcox can physically and economically affect the Mark Twain Hotel, identified in 2019 and shown as historically significant in the 2020 Historic Resources Survey on-line in the City Planning Department’s website.

FEIR must recognize Mark Twain Hotel as an historically significant structure and eliminate adverse impacts. See Attachment #3

Response to Comment No. 6-5

Hotel Mark Twain⁴ was identified as appearing eligible for designation in the California Register of Historical Resources (California Register), as well as locally as a potential Historic Cultural Monument, in a survey published at the end of January 2020, right before publication of the Draft EIR. Hotel Mark Twain had not previously been identified as appearing eligible for designation in any of the previous surveys of Hollywood, which were undertaken in 1986, 1997, 2003, and 2010. The January 2020 survey provided new information on Hotel Mark Twain linking it with the African American community. Specifically, the survey found Hotel Mark Twain a:

[S]ignificant example of a property associated with Los Angeles’s African American community. Listed in the Green Book, an African American travel guide, between 1949 and 1961, this property was one of relatively few hotels where African American travelers were welcome prior to the Civil Rights movement. Building is accompanied by a rooftop sign with neon illumination. Due to alterations, including door replacement, window replacement, and

⁴ While the commenter uses the name “Mark Twain Hotel” the Historic Resources Survey Report prepared for CRA/LA, a Designated Local Authority in January 2020 uses the name “Hotel Mark Twain.” Hotel Mark Twain is therefore used throughout this Final EIR.

modification of the entrance, the building may not retain sufficient integrity for listing in the National Register.

As noted directly above, the significance of Hotel Mark Twain is derived from its association with the African American community. Based on the statement of significance above, important aspects of the setting, which is defined as “the physical environment of a historic property,”⁵ is the character of the dense, urban environment, surrounded by other buildings. Indeed, Hotel Mark Twain is constructed flush with the sidewalk line with a one-story commercial building located immediately adjacent to the north. The north elevation of Hotel Mark Twain, visible only over other properties, is secondary and does not have any decorative features. Similarly, the south elevation is also secondary and lacks decorative features. The only elevation with distinct decorative features is the west façade, indicating the historic pattern of development typical in Hollywood of other buildings constructed immediately adjacent. The proposed new, adjacent building does not have an indirect impact on the important characteristics of the setting. In contrast, the Project contributes to the context of a dense, urban environment.

With regard to the commenter’s assertion regarding physical impacts, see Response to Comment No. 6-19, below.

With regard to the commenter’s assertion regarding economic impacts, economic impacts are not required to be analyzed under CEQA unless such economic impacts can be shown with substantial evidence to have a reasonably foreseeable physical impact to the environment. No such substantial evidence has been provided to support the claim that a physical impact to the environment would result.

Comment No. 6-6

4. **Avoiding genuine affordable housing:** By asking for allowance to build 2.5 x the floor area permitted by right and offering 10% “workforce housing”, [sic] the developer evades the normal, monitorable requirements for “affordable” housing when using incentives in SB 1818, TOC, or SB 330 or other laws. Hollywood has a glut of luxury housing resulting from a mountain of similar past discretionary actions. Hollywood Heritage customarily avoids raising such issues, but the data has piled up so it can’t be ignored. A false “conflict” of preservation with affordable housing is leveled against preservation. But it is the outsized project that puts Hollywood Heritage on the defensive, when yet again no affordable housing results from the give-away of units. The problems and conflicts are being created for preservation. A code-compliant project would not have these problems.

⁵ U.S. Department of the Interior, National Park Service, “National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation” (1998), p. 45.

FEIR must clarify specific income level served by “workforce housing”—approximately \$90,000 per year or \$2,250/month rent—and what agency will be charged with monitoring performance by the developer.

See Attachment #4

Response to Comment No. 6-6

The comment requests that the income level for the Project’s voluntary workforce housing units should be clarified in the Final EIR but does not address any specific issue in the Draft EIR. As set forth in the Draft EIR, Project Description, page II-1, footnote 1 “Per the Los Angeles Housing and Community Investment Department, the qualifying maximum income level for workforce housing is 150 percent of the area median income based on family size.” The comment also references Senate Bill (SB) 1818, Transit Oriented Communities (TOC) Guidelines, and SB 330, which are State and City laws that the Project is either not utilizing or provisions or updated provisions which it is not subject to, pursuant to the date that its entitlement applications were filed.

Comment No. 6-7

Positive design approaches: Hollywood Heritage recognizes the attempt to ameliorate the project’s impact:

- Recounting of the Attie Building’s history and significance with a genuine effort to guide restoration in a Standards-compliant way (reflected on page IV.B-34), is well done. There are detailed issues and a need for a commitment to the timing.
- Keeping the proposed new building within the National Register District to the allowed height of 45’ in accordance with the Sec 7.3.A.1 of Hollywood Boulevard Urban Design Plan is good. Again there are detailed issues which can optimize the solution.
- Designing a new residential building to partially mitigate its overheight effect, by stepping back the bulk in accordance with Sec 7.4.B.2 of the Hollywood Boulevard Urban Design Plan is good. But the overall result still has a long way to go.

Response to Comment No. 6-7

This comment, which summarizes project design elements that the commenter considers positive, is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment No. 6-8

Significant omissions from DEIR: Hollywood Heritage is highly concerned that this DEIR is analyzing and illustrating a specific project, but not honestly and forthrightly revealing critical information:

- **Must enforce Environmental Leadership, not let it drop:** The project was granted State incentives based on a promise to achieve the LEED Gold building rating, prevailing wages, a 15% improvement in transportation efficiency, etc. The developer gained relief in Sacto from environmental law challenges on November 8, 2019. BUT the DEIR on page 16 erroneously says the project “*would apply* for LEED Gold certification”. [sic] The “sustainability features” touted in the DEIR are simply the existing mandatory minimums under State building codes. They cannot be presented as any example of compliance or earning the “Leadership” benefits. The Project Description cites that a binding written agreement must already exist implementing the Leadership mandates. The omission for the DEIR is conspicuous, and all the conditions must be included in the FEIR.

LEED Gold is a requirement of the Project and the other “leadership” promises must become requirements of the project.

Response to Comment No. 6-8

As part of its certification under AB 900, the Jobs and Economic Improvement Through Environmental Leadership Act, the Project is required to achieve LEED Gold® certification or better. Specific measures, including LEED Gold® certification or better, which are required for the Governor to certify the Project under AB 900, are included in Draft EIR, Section II, Project Description, pages II-6–9. The text identified on page 16 of the Draft EIR has been updated in Section III, Revisions, Clarifications, and Corrections, of this Final EIR.

With respect to the commenter’s assertion that the sustainability measures included in the Project Description should not count towards the Project’s required LEED Gold® certification, they are not intended to. These measures are general sustainability features intended to inform the reader. The Project’s AB 900 application, included as Appendix B of the Draft EIR, includes a list of measures and performance standards to support its LEED Gold® certification (see pages 7 and 8). Specific measures include, but are not limited to, recycling and or salvaging 75 percent of nonhazardous construction debris; MERV 13 air filtration; bicycle facilities; outdoor open space equaling or exceeding 30 percent of the Project Site area; installation of separate meters for irrigation and indoor fixtures; the provision of the equivalent of 105 kilowatts of photovoltaic panels; heat island reduction strategies; and a reduction in indoor water use by a minimum of 35 percent below LEED® baselines.

Finally, the Project's binding legal agreement implementing the mandates of AB 900 was not omitted from the Draft EIR. The City, through certification and adoption of the Draft EIR and granting of entitlements, would include legally binding conditions of approval and a mitigation monitoring program which satisfies the AB 900 requirement. Additionally, the Project's AB 900 application, which serves as a binding legal agreement, as well as the Governor's certification and Joint Legislative Budget Committee's concurrence letter are included as Appendix B of the Draft EIR. Specific to the Project's LEED Gold® commitment, as discussed on page 8 of the application, "[b]ecause LEED certification is not granted until a project is completed and operational, the Applicant will petition the Governor to approve construction and project operation pending completion of the certification process, as permitted under PRC Section 21178."

Comment No. 6-9

- Must recognize and follow Hollywood Boulevard Urban Design Plan: On November 11, 2019 the Hollywood Redevelopment Plan land use responsibilities transferred to the City of Los Angeles. On November 7, at a hearing to approve the long-delayed Hollywood Boulevard Urban Design Plan in time for that transfer, Project representatives lobbied successfully to stop the Community Redevelopment Agency from approving the important plan. This Urban Design Plan was a 3rd updated version prepared by CRA to clarify the design standards and review process for the area surrounding and on Hollywood Boulevard—a requirement written into the Redevelopment Plan in 1986. For over 30 years "All new development in the District shall meet the design guidelines to ensure that the objectives of the District are achieved." Whether or not the guidelines were ever formally adopted by CRA, they reviewed projects. The City as successor agency is required to review as well.

FEIR must include a comprehensive written review of proposed new construction in accordance with the Urban Design Plan—adopted or not. One option is to incorporate into Site Plan Review. The FEIR may choose to use the 1993 version- as CRA had agreed to before the transfer—or review according to all versions.

Response to Comment No. 6-9

State CEQA Guidelines Section 15125(d) requires analysis of a project's consistency or inconsistency with applicable land use plans. An "applicable" plan is a plan that has been adopted and legally applies to a project—draft plans need not be evaluated. (See *Chaparral Greens v. City of Chula Vista* (1996) 50 Cal.App.4th 1134, 1145). Additionally, the comment conflates local land use authority with CEQA review, as no threshold exists which analyzes compliance with unadopted design guidelines, but rather conflict with adopted documents which are intended to avoid or mitigate environmental effects. No supplemental design plan has been adopted that is applicable to the Project

Site. The comment correctly notes that a draft design plan for the Hollywood Boulevard District and Franklin Avenue Design District was previously prepared for consideration by the CRA/LA, the successor agency to the former redevelopment agency, but this draft plan was never adopted by the CRA/LA, nor has it been adopted by the City, as the current administrator of the land use provisions of the Redevelopment Plan. Moreover, the Project's vesting entitlement applications preclude the application of any subsequently adopted land use ordinance, policy, or standard to the Project.

Comment No. 6-10

- Must acknowledge the City's Conservation Element: An unacceptable omission from the DEIR Land Use section is that fact that the City of Los Angeles General Plan Conservation Element broadly recognizes preservation of historic buildings as a General Plan priority. The DEIR implies the Element is limited to landscape and open space features, and thus, as implied on page IV.F-23–24 has no conflict with the “applicable goals, objectives, and policies set forth in the Conservation Element”. [sic] For CEQA, the Conservation Element casts a broad net for eligibility, including buildings identified by the Community Redevelopment Agency, etc.

The omission must be corrected overtly in the FEIR

Response to Comment No. 6-10

The analysis of the Project's consistency with the historic aspect of the Conservation Element were inadvertently omitted from Section IV.D, Land Use, of the Draft EIR. This analysis has been restored as part of Section III, Revisions, Clarifications, and Corrections, of this Final EIR. As discussed therein, the Project would not conflict with the applicable historic policies in the Conservation Element.

Comment No. 6-11

- Must show all the CRA-related land use entitlement processes, created as “Multiple Approvals Procedural Revisions Ordinance” No. 182,106 (Multiple Approvals Ordinance) which amends Chapter 1 of the Los Angeles Municipal Code (the “Code”). The DEIR fails to address conformance with the Redevelopment Plan—falling back of “goals and objectives” of redevelopment rather than the actual plan contents of the Plan.

The omission must be corrected overtly in the FEIR

Response to Comment No. 6-11

The commenter is incorrect that the Draft EIR fails to address conformance with the Redevelopment Plan. The Land Use section of the Draft EIR contains a detailed analysis of the Redevelopment Plan (see Draft EIR, Section IV.F, Land Use, pages IV.F-30–32) which concludes that “the Project would not conflict with the applicable goals, objectives, and policies of the Redevelopment Plan.” The commenter has not provided any substantial evidence demonstrating a potential environmental impact that would occur from any conflict with the Redevelopment Plan. In addition, the Project is seeking Redevelopment Plan Project approval pursuant to LAMC Section 11.5.14 as disclosed in the Project Description. (See Draft EIR, Section II, Project Description, page II-23.)

Comment No. 6-12

- Must process the removal of the “D” conditions as a Variance, rather than a Zone Change.

Response to Comment No. 6-12

This comment does not raise an environmental concern or issue. This comment will be forwarded to the Decision Makers for their review.

Comment No. 6-13**NEEDED CEQA ACTIONS**

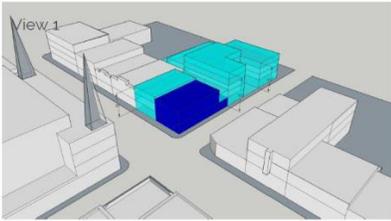
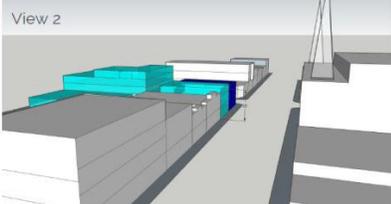
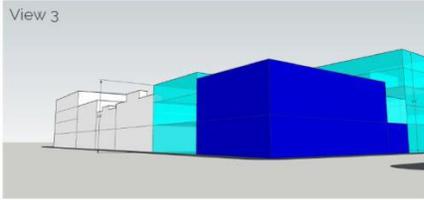
Environmentally Superior Project: Hollywood Heritage agrees that the environmentally superior Project for this site is Alternate #5. The site development would be limited to what is allowed by zoning, which would enable to project to be significantly less adverse to historic resources.

Response to Comment No. 6-13

This comment does not raise an environmental concern or issue. This comment will be forwarded to the Decision Makers for their review.

Comment No. 6-14

As the DEIR showed no evidence of conforming to commitments made on environmental leadership, and as “workforce housing” still means \$2,500–\$3,000 month rent/unit, (and no commitment to how many units) the environmental superiority is of the code-compliant project is evident. *Details provided in Attachment #5.*

HISTORIC RESOURCES	ZONING & USES	BUILT FORM	PUBLIC REALM
		<h3>MASSING</h3>	
		By-Right: 45 feet & FAR 2:1	
		Density Bonus with Affordable Housing	
		Resulting FAR 2.7:1 (Including Density Bonus)	
		GBA: 119,109 sq ft	
		Includes open space along Wilcox	
		Maximum Height: 55 ft	
			

Response to Comment No. 6-14

The commenter asserts that the Draft EIR provides no evidence that the Project will comply with its commitments under AB 900. As set forth in Response to Comment No. 6-8, above, the Project's binding legal agreement implementing the mandates of AB 900 was not omitted from the Draft EIR. The Project's AB 900 application, which serves as its binding legal agreement, as well as the Governor's certification and Joint Legislative Budget Committee's concurrence letter are included as Appendix B of the Draft EIR.

Comment No. 6-15

Needed corrections to facts and analysis: Throughout this letter Hollywood Heritage has pointed out factual errors and analytical conclusions which must be corrected in the FEIR. The preferred method of correction is changing the project so that the issues do not occur.

Response to Comment No. 6-15

See Response to Comment Nos. 6-1 through 6-14.

Comment No. 6-16

Needed Mitigation Measures:

- **MM2—(Cultural Resources): Attie Building Rehabilitation Plan:** The Attie Building will be submitted for Cultural Heritage Monument consideration, with an attached Preservation Plan as a part of the nomination showing a Standards-compliant approach to the restoration, including the storefront reconstruction. The nomination must be accepted by the Cultural Heritage Commission for

consideration prior to the start of any demolition associated with the project and any alterations on the Attie Building.

Response to Comment No. 6-16

CEQA Guidelines Section 15064.5(b)(3) states, “[g]enerally, a project that follows the *Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* or the *Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource. As detailed in the Draft EIR and accompanying Cultural Resources Report (see Draft EIR, Section IV.B, Cultural Resources, pages IV.B-33 through IV.B-37 and Draft EIR, Appendix D.1, pages 30–37), the Project conforms with the Secretary’s Standards..

To ensure compliance with the Secretary’s Standards the following Project Design Feature has been added (see Section III, Revisions, Clarifications, and Corrections to the Draft EIR, of this Final EIR):

CUL-PDF-1: The Project will prepare a Historic Structure Report (HSR) that will further document the history of Attie Building and guide its rehabilitation in compliance with the Secretary of the Interior's Standards for Rehabilitation (Standards). The HSR will be completed prior to the development of architectural or engineering plans for the rehabilitation. The HSR will be prepared based upon the National Park Service's Preservation Brief #43: The Preparation and Use of Historic Structure Reports. The HSR will provide documentary, graphic, and physical information about the existing conditions of the character-defining features and make recommendations for both changes to the buildings to suit new uses and modern amenities as well as their on-going maintenance after Project completion. The HSR will specifically address the treatment of the Hollywood Boulevard and Wilcox Avenue elevations. The HSR will be provided to the Office of Historic Resources (OHR) for concurrence.

The Attie Building shall be rehabilitated in accordance with the HSR and the Standards. The rehabilitation plans shall be:

1. Developed in consultation with a licensed architect or a historic preservation consultant meeting the Secretary of the Interior’s Professional Qualifications Standards for historic architecture with at least five years of demonstrated experience in the rehabilitation of historic buildings (Resource Expert).
2. Reviewed by the Resource Expert for compliance with the Standards.

- a. Prior to the completion of the design development drawings, the reviewer shall prepare a technical memorandum regarding compliance with the Standards. In the event the plans do not comply with the Standards, the memorandum shall make recommendations for changes to bring them into compliance.
 - b. The Applicant or the Resource Expert shall submit the memorandum to OHR for concurrence.
 - c. The recommendations of OHR shall be incorporated into the construction documents.
 - d. Building permits may be issued after OHR has concurred the plans comply with the Standards.
3. The requirement of compliance with the Standards for future exterior alterations shall be disclosed in the lease agreements, agreed upon in writing, and mutually enforced by the Applicant and the City. The tenants shall not be permitted to conduct work that does not comply with the Standards.

Therefore, the Project would have a less than a significant impact on historical resources and mitigation is not required.

Comment No. 6-17

- MM3: (Cultural Resources): Attie Building Preservation Monitoring: Any alterations or restoration/rehabilitation at the Attie Building shall be directed by and monitored in accordance with a Preservation Plan. Submittal to City of Los Angeles, Office of Historic Resources required for review of findings and plans for restoration. Submittal process and review should be integrated into overall construction schedule.

Response to Comment No. 6-17

As noted above in Response to Comment No. 6-16, the Project conforms with the Secretary's Standards, therefore mitigation is not required. Additionally, the City Office of Historic Resources reviewed the historic resource issues prior to circulation of the Draft EIR, and concurred with the findings of the Historic Resource Assessment. Further, the Applicant has modified the rehabilitation plan. See Response to Comment No. 6-52 for additional details.

Comment No. 6-18

- MM4—(Cultural Resources) Infill Building in Historic District: The new Hollywood Boulevard building will be redesigned to make a building which contributes to the District.

Response to Comment No. 6-18

As noted above in Response to Comment No. 6-16, the Project conforms with the Secretary's Standards, therefore mitigation is not required.

To the extent the commenter is suggesting that the Draft EIR should have included an additional alternative that presented a design alternative, such an additional alternative is not required. CEQA Guidelines Section 15126.6(a) states that "an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparable merits of the alternatives." CEQA does not require the Draft EIR to consider every conceivable alternative to a project that would achieve the same purpose in order to provide the City's decision-makers with the information they need to compare the merits of the alternatives to the Project and allow for a reasoned choice. The Draft EIR need only to "consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation" as selected by the lead agency (CEQA Guidelines Section 15124 ["A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR"]). In conformance with CEQA Guidelines Section 15126.6(a), five alternatives were identified and analyzed in Section V, Alternatives. These alternatives constitute a range of reasonable alternatives to the Project that would avoid or substantially lessen the Project's significant environmental effects. Further, the Draft EIR correctly concludes that the Project does not involve significant adverse impacts to historical or cultural resources. Therefore, mitigation is not required.

Comment No. 6-19

- **MM5—(Cultural Resources) Mark Twain Hotel mitigations:** The project impact to the Hotel through the excavation and vibration associated with new construction has been addressed. But mitigations to lessen impacts on the operation of the neighboring hotel during construction, and a re-design of the project to eliminate the un-relieved huge solid wall outside the Mark Twain windows, must be required.

Response to Comment No. 6-19

Direct impacts to Hotel Mark Twain, due to construction activities, were considered in the Draft EIR Section IV.G, Noise. Specifically, the noise analysis considers construction noise and vibration impacts on sensitive receptors. Receptor R1 (hotel uses adjacent to the Project Site) in the Draft EIR on Table IV.G-6 is representative of both the Hotel Mark Twain and the Dream Hotel. The description of R1 in Table IV.G.6 has been revised to clarify it represents both hotels. See Section III, Revisions, Clarifications, and Corrections of this Final EIR.

As to construction noise, the Draft EIR identified a significant and unavoidable noise impact at R1 after implementation of temporary sound barrier (Mitigation Measure NOI-MM-1); no other feasible mitigation measures were identified that would further reduce the temporary construction noise impact. (See Draft EIR pages IV.G-41 through IV.G-43.) As to on-site construction vibration impacts, with implementation of Mitigation Measure NOI-MM-2, vibration levels at R1, the Hotel Mark Twain, would not exceed the significant criteria for building damage and, therefore, impacts would be less than significant as to on-site construction activities. However, vibration impacts with respect to human annoyance at the hotels (R1) would exceed the significance criteria even after implementation of Mitigation Measure NOI-MM-2 and, and therefore would be significant and unavoidable. (See Draft EIR, Section IV.G, Noise, page IV-G-50.)

The commenter suggests the proposed Project's south façade design will have an indirect impact on the Hotel Mark Twain. It is assumed that the comment refers to an indirect impact to the setting of a historical resource. As described in Response to Comment No. 6-5, important aspects of the setting include its dense, urban environment. The Project contributes to the context of a dense, urban environment and, does not have an indirect impact to the important characteristics of the setting.

Comment No. 6-20

- MM (Land Use): Floor Area Averaging Removes all Developable FAR from 2 Hollywood Boulevard Lots: The use of the lot area of the Attie Building and a neighboring building within the Historic District to contribute to the project's allowable FAR/development means that the proposed Vesting CUP to allow Floor Area averaging in a Unified Development means that a deed restriction must be put on those parcels prohibiting any future redevelopment, and the D conditions be re-written to reflect the absence of developable floor area (other than historic repair of current square footage)

Response to Comment No. 6-20

The comment does not raise any specific issues with the EIR analysis or conclusions. The comment proposes a mitigation measure be added to the Land Use section. The Land Use section of the Draft EIR concluded the impact to Land Use was less than significant. No mitigation measure is needed. The comment will be provided to the Decision Makers for their review.

Comment No. 6-21

- MM(Transportation): The project shall achieve 15% Leadership goal as agreed.

Response to Comment No. 6-21

The commenter requests a transportation mitigation measure that is equivalent to the AB 900 requirement of a 15 percent peak hour trip reduction. Such mitigation measure is unnecessary as it is already required under Project Design Feature TR-PDF-2. Project design features, like mitigation measures, are fully enforceable and included in the Mitigation Monitoring Program (see Section IV, Mitigation Monitoring Program, of this Final EIR).

Comment No. 6-22

- MM (Land Use): Compliance with Hollywood Boulevard Urban Design Plan required

Response to Comment No. 6-22

As noted above in Response to Comment No. 6-9, no design plan has been adopted that affects the Project Site. As such this mitigation measure is inappropriate.

Comment No. 6-23

- MM—Prevailing wages—this is a requirement of the Leadership agreements executed by the Developer with the State. This requirement must be made a permanent requirement for the Project in the event the Developer sells the project—or the EIR process will need to be re-instated

Response to Comment No. 6-23

As noted in Response to Comment No. 6-8, above, all of the Project's AB 900 commitments, including the prevailing wage commitment, are set forth in the Project's AB 900 application, which serves as its binding legal agreement. (See Appendix B of the Draft EIR.)

Comment No. 6-24

MM—LEED Gold—see above re Leadership agreements.

Response to Comment No. 6-24

See Response to Comment No. 6-8.

Comment No. 6-25

Given the severity of the problems with the new building design it appears that a façade redesign, a significant size reduction, and especially a redesign of the south-facing portion must be done prior to sending out the FEIR.

Response to Comment No. 6-25

Contrary to the commenter’s allegation of problems with the new building design, the new building design is compatible with the surrounding retail buildings, specifically the Attie Building, in size, scale, proportion, and massing, in conformance with Standard 9. See Draft EIR, Section IV.B, Cultural Resources, page IV.B-35; see Response to Comment No. 6-3, above.

Comment No. 6-26**Attachment #1****DETAILED DISCUSSIONS****Attie Building Restoration—
Ensuring no Adverse Impact**

History and Significance: The Attie Building, at 6436–6440 Hollywood Boulevard, has long been acknowledged as historically significant. Appendix D cites the listing as a 1D, being a contributing structure to the Hollywood Boulevard Commercial and Entertainment Historic District listed on the National Register of Historic Places and the California Register.

The Attie Building’s Art Deco style, designed by Henry Minton (a prolific architect for Bank of Italy/Bank of America buildings), was built in 1931. Its 9,000 sf is mostly in a 2 story portion at the southwest corner of Hollywood and Wilcox, but it also has a one story wing south along Wilcox Avenue. Entrance to the 2nd story is and was from Wilcox.

The prime period of the District ends in 1939. The District is a rare District listed at the highest level of significance in the nation. The Attie Building restoration, therefore, should focus on the building appearance up to 1939. Appendix D provides a well-researched and detailed history of the building’s construction and architect places the building in the context of the architect’s work and identifies visible extant important features.

Response to Comment No. 6-26

The comment acknowledges that Appendix D.1 to the Draft EIR, the Cultural Resources Report, provides a “well-researched and detailed history” of the Attie Building’s construction etc. that acknowledges that the Attie Building is a historic resource and will be

rehabilitated and restored in conformance with the Secretary of the Interior's Standards for Rehabilitation. The commenter suggests that the restoration focus on the building's appearance up to 1939. As discussed on page IV.B-34 of the Draft EIR, "[t]hrough study of historic photographs and extensive non-destructive testing, the Project would provide for accurate composition of the storefronts from the 1931–1939 period of significance."

Comment No. 6-27

HCM: The historic consultant concludes that the Attie Building is eligible of as a Cultural Heritage Monument, and we agree.

Response to Comment No. 6-27

The Attie Building is a contributing resource to the National Register listed Hollywood Boulevard Commercial and Entertainment Historic District. Because the historic district is listed in the National Register, it was automatically listed in the California Register. In general, CEQA Guidelines define "historical resource" that which has been determined eligible for listing in the California Register, or one that is designated at the local level (§15964.5). As the Attie Building is listed in the California Register, it was identified as a historical resource under CEQA. An evaluation of eligibility as a Historic Cultural Monument is not required to identify a historical resource.

Comment No. 6-28

Follow-up action on Attie Building: The DEIR Appendix D concludes "no adverse effect" of the Attie Building restoration, based on the threshold that "alteration of a significant resource that does not conform to the Secretary of the Interior Standards will result in a significant impact." (page 30) Section IV Cultural Resources of the DEIR evaluates the proposed "restoration" based on applicable items from the Secretary of Interior Standards. The analysis on page IV.B-32—including recasting of missing terra cotta spandrels, storefront reconstruction, etc—is [sic] good.

Response to Comment No. 6-28

The commenter agrees with the Historic Consultant's determination of no adverse effect of the Attie Building via restoration in compliance with the Secretary of the Interior's Standards for Rehabilitation and the analysis provided in the Draft EIR at page IV.B-32.

Comment No. 6-29

Follow-up using the Secretary of the Interior Guidelines for Rehabilitating Historic Buildings normally includes *identifying, retaining and preserving* character-defining features. A detailed approach is as follows:

1. Identifying character-defining features: The DEIR does not provide a comprehensive investigation of all areas and surfaces of the identified historic resource. Visual examination and The Non Destructive Evaluation Façade Investigation Report and Addendum do not provide conclusive determination of historic construction or materials that may be extant. Without selective removal of non-historic materials obscuring interior walls and exterior façades a complete inventory of remaining historic construction and materials is not possible, and thus the proposed design's accuracy cannot be concluded.

Response to Comment No. 6-29

The commenter asserts that the Draft EIR does not provide a comprehensive investigation of all areas and surfaces of the identified historic resource that removal of non-historic materials obscuring interior walls and exterior façades be undertaken. The Cultural Resources Report identifies character-defining features of the Attie Building (see Draft EIR Appendix D.1, Cultural Resources Report, page 18). "Preservation Brief 17: Architectural Character—Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving their Character" defines "character" as "all those visual aspects and physical feature that comprise the appearance of every historic building."⁶ As delineated in Preservation Brief 17, character-defining features were based on a an understanding of the significance of the Attie Building to the Hollywood Boulevard historic district, as well as a review of alterations over time. Existing storefronts, which are contemporary, were not identified as character-defining features as they have been extensively altered several times since the Attie Building was constructed.

The Project involves restoration of the Attie Building storefronts to the period of significance, 1931–1939. The Secretary's Standards define restoration as "the act or process of accurately depicting the form, features, and character of a property as it appeared at a particular period of time by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period." The proposed restoration is based on examination of historic photographs. Evidence of extant historic fabric was extensively studied through visual inspection, review of alteration permits, and non-destructive testing. While it is possible small vestiges of historic material may be buried deep in a wall, it will not further the understanding of historic conditions, historic construction, or historic materials, and thus further investigation is not necessary or required. Restoration of any historic materials will be in conformance with the Secretary's Standards, specifically guidance provided by the National Park Service's Technical

⁶ Nelson, Lee H., FAIA, "Preservation Brief 17: Architectural Character—Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving their Character," (Washington, DC: U.S. Department of the Interior, National Park Service, 1988), www.nps.gov/tps/how-to-preserve/briefs/17-architectural-character.htm, accessed May 29, 2020.

Preservation Services outlined in their Preservation Briefs and Preservation Tech notes, available online (www.nps.gov/tps/how-to-preserve/by-topic.htm) and compiled in the publication *The Preservation of Historic Architecture*.⁷

As discussed in Response to Comment No. 6-16, a Project Design Feature has been added to ensure compliance with the Secretary's Standards. See Section III, Revisions, Clarifications, and Corrections to the Draft EIR, of this Final EIR. Materials would be addressed in the HSR.

Comment No. 6-30

2. Retaining and preserving character-defining features: A commitment to the restoration/rehabilitation of this building should be ingrained in the project in order to support any conclusion that the project before us does not adversely affect the Attie Building. The standard requirement is a Rehabilitation Plan, which provides guidance required to preserve character-defining features and the platform for reconstruction of missing components based on physical evidence. The Rehabilitation Plan includes the following components

- List of qualified preservation architect, architectural conservator and specialty contractor consultants to perform further documentation,
- Condition Assessment Report (material condition assessments, analysis and removal of non-historic materials potentially obscuring historic building fabric). Documents findings—evaluation of historic materials to be performed by architectural conservation professional, (Architectural Conservator) member of American Institute for Conservation, PA or Fellow. Report includes written assessment, photographic documentation, testing and analytical report documentation that may be required to characterize historic finishes.
- Protection Plan outlining methods and means for protection of historic structure before and during construction. Protection Plan to be integrated with overall construction schedule and should incorporate anticipated changes of protection materials and locations depending on construction activity, as well as monitoring needed to protect from over- demolition.
- Removal Plan outlining methods and means for removal of interior and exterior non historic materials, documentation of findings and timetable for work to be performed including integration with construction schedule. This work will be required to implement rehabilitation/restoration measures.

⁷ *United States Department of the Interior, The Preservation of Historic Architecture, (Guilford, CT: The Lyons Press, 2004).*

- Treatment Plan prepared by Architectural Conservator and Preservation Architect based on findings documented in Condition Assessment Report. The Treatment Plan outlines methods and means for cleaning, repairs, reproduction of losses (where necessary and approved) of historic fabric. Integration of the Treatment Plan integrated into overall construction schedule.

Response to Comment No. 6-30

The Project does not involve a significant adverse impact on the Attie Building. The Attie Building will be restored. As detailed in the Draft EIR and accompanying Cultural Resources Report (see Draft EIR, Section IV.B, Cultural Resources, pages IV.B-33 through IV.B-37 and Draft EIR, Appendix D.1, Cultural Resources Report, pages 30–37), the treatment of the Attie Building proposed by the Project conforms with the Secretary of the Interior’s Standards for Rehabilitation. Nonetheless, the Applicant has proposed design refinements in response to concerns stated by commenters. See Response to Comment No. 6-52, below.

Comment No. 6-31

3. Restoration Planned—correct errors in DEIR: The DEIR on Page II-10 mistakenly says the Attie building restoration will comply with the building code for new construction under Sec 3404A of the Building Code. That is the code for hospitals. Section 34 has been moved to the California Existing Buildings Code, and the code says the opposite: the Attie Building is entitled to existing non-conforming rights, and additionally is eligible for use of the permissive sections of the State Historic Building Code.

Response to Comment No. 6-31

This comment points out an error in the Project Description. The referenced code citation was from the 2016 California Building Code. This text has been updated in Section III, Revisions, Clarifications, and Corrections to the Draft EIR of this Final EIR. As revised therein, in accordance with Section 101.4.7 of the 2019 California Building Code, the “provisions of the California Existing Building Code shall apply to matters governing the repair, alteration, change of occupancy, addition to and relocation of existing buildings.”⁸

Comment No. 6-32

Special attention to Attie Building storefront investigation and design:

1. Storefront on Wilcox: Page IV.B-32 of the DEIR states that no physical evidence of the storefronts exists, and no physical evidence of earlier storefronts was revealed. But the

⁸ 2019 California Building Code, Section 101.4.7 Existing Buildings.

exploration—as noted above—was incomplete. Photographic evidence from 1934 show clearly the needed evidence on Wilcox at the 1 story-portion of the Attie Building: a sign band, awnings (thus confirming an awning pocket), and by implication storefront windows for stores. The same is evident on Wilcox at its corner with Hollywood.

Response to Comment No. 6-32

The Project will retain and restore the Attie Building, and as determined in the Draft EIR. Further, CUL-PDF-1 has been added to the Final EIR. See Response to Comment No. 6-16, above. As a result, the Project would result in a less than significant impact on cultural resources. The extant portions of the structure will be retained, and any significance conveyed currently will still be conveyed with the Project. The commenter fails to provide new or substantial evidence which would result in a significant impact. Further, restoration of the Attie Building storefronts is based on examination of historic photographs. In conformance with Restoration Standard 4, “restoration will be based on the accurate duplication of historic features and elements substantiated by documentary or physical evidence rather than on conjectural designs or the availability of different features from other historic properties.” While historic photographs from the period 1931–1939 indeed show a sign band and awning along the one-story portion on Wilcox Avenue, it is not definitively conclusive that a storefront was present. For example, it is possible the awning protected an exterior news stand or other informal business. Furthermore, Sanborn Fire Insurance maps do not indicate a separate retail space in this one-story portion, rather it shows an extension of one of the retail spaces along Hollywood Boulevard (see map 5 included with Draft EIR Appendix D.1, Cultural Resources Report). Documentary and physical evidence does not convincingly substantiate storefront windows along the one-story portion of the Attie Building on Wilcox Avenue. See also Response to Comment No. 6-30, above.

Comment No. 6-33

2. Storefront column spacing in 1939: Hollywood Heritage believes the storefront design proposed by the Project is not accurate. Up to 1939, it appears the storefront rhythm existed in keeping with the 2nd floor terra cotta pilasters on Hollywood Boulevard. Page IV.B-32 of the DEIR states that no physical evidence of the storefronts exists. However, in the report itself photos of the store interiors showing that the column lines on the interior appear to align with the 2nd story terra cotta pilasters on the building front.

Response to Comment No. 6-33

Design of the storefronts along the north façade of the Attie Building is based on close examination of historic photos, in conformance with Restoration Standard 4. The clearest historic photograph of the Attie Building during the period of significance, 1931–1939, was provided by Hollywood Heritage, the commenter (see Historic Photograph 5 in

Draft EIR Appendix D.1, Cultural Resources Report). The photograph clearly shows configuration of the storefronts on Hollywood Boulevard not aligned with second floor pilasters.

The eastern retail space retains a row of support columns running perpendicular to Hollywood Boulevard. However, these support columns step back some distance from the storefront windows. See also Response to Comment No. 6-30, above.

Comment No. 6-34

3. **Better storefront restoration**: This suggests that the Attie Building street level design matched every other terra cotta building of its time period—with columns roughly 16’ on center at the front of the building, likely clad in terra cotta, or located immediately behind the glass. Photo evidence from 1933, 1934 and 1938 confirm that when the single tenant building sign band was divided into 2 tenants, it aligned with the 2nd floor terra cotta pilaster. Good assumption is that through 1939 the column lines came to the ground. Later post 1940’s [sic] storefronts such as Graysons and Florsheim did not honor that line.

Response to Comment No. 6-34

As noted in Response to Comment No. 6-33, above, design of the storefronts along the north façade of the Attie Building is based on close examination of historic photos, in conformance with Restoration Standard 4. Photographic evidence does not show columns 16 feet on center along the front of the building, clad in terra cotta or any other material. Furthermore, photograph evidence clearly shows configuration of the storefronts on Hollywood Boulevard not aligned with second floor pilasters. The design of the storefronts conforms with Rehabilitation Standard 3, which states that: “Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.” Furthermore, design of the storefronts conforms with Rehabilitation Standard 6, which states that “replacement of missing features will be substantiated by documentary and physical evidence.”

Comment No. 6-35

Suriya mural having historic significance and follow-up:

1. **You Are The Star by Thomas Suriya, 1993**: The DEIR provides adequate documentation of the mural identifying the artist and past restoration efforts. While reporting that the mural is identified by the *Mural Conservancy of Los Angeles*, it does not clarify whether or not the mural is registered with the City of Los Angeles Department of Cultural Affairs (CAD) and thus falls under the stewardship of the Department of Cultural Affairs which oversees mural conservation efforts. *The FEIR must clarify this stewardship.*

Response to Comment No. 6-35

The mural is included in the City's register of Vintage Original Art Murals. A Vintage Original Art Mural is a mural that existed prior to October 12, 2013. According to the Cultural Affairs FAQs,

The City's Mural Ordinance is local legislation adopted by the Mayor and City Council related to existing murals and the creation of new murals in Los Angeles. The Mural Ordinance was established in order to: 1) Lift the 2002 ban on murals on private property, 2) Differentiate new and existing murals from current prohibitions that apply to outdoor advertisements, 3) Create a mural registration process, and 4) Increase public access to and community participation in the creation of original works of art.

However, the Mural Ordinance does not address stewardship or provide any protection or benefits. Therefore, no further analysis is required.

Comment No. 6-36

2. Follow-up on Mural: A comprehensive mural Condition Assessment and Treatment Plan following the guidelines and standards provided by CAD is missing. Condition Assessment will provide a detailed description of condition issues and recommended mitigation measures to be detailed in a comprehensive Treatment and Protection Plans. The Treatment Plan and Protection Plans should be integrated into the larger construction plan. Conservation/restoration efforts should be performed by a mural/paintings conservator with membership in the American Institute for Conservation, PA or Fellow.

Response to Comment No. 6-36

The Mural was restored in 2007 by the artist, Thomas Suriya, with the assistance of a conservator and is in good condition. See Draft EIR Section IV.B, Cultural Resources page IV.B-2 and Draft EIR Appendix D.1, Cultural Resources Report, page 13. The Cultural Affairs Department does not have guidelines for conservation of private murals.

Comment No. 6-37**Attachment #2****DETAILED DISCUSSIONS****Impact of Demolition and Infill Replacement Building
(6430–6434 Hollywood)**

The DEIR concludes that the demolition of 6430–34 Hollywood Boulevard and the new construction replacing it have no significant adverse effect. *Hollywood Heritage* sees “follow-on” work needed in order to finalize that claim.

Response to Comment No. 6-37

The comment accurately states that the Draft EIR concluded that demolition of the 6430–6434 Hollywood Boulevard building and the new construction replacing it will not create a significant adverse effect. (See Draft EIR Section IV.B, Cultural Resources, page IV.B-33). The commenter notes that it needs to undertake “follow-on” work to finalize that claim, yet notes nothing in particular.

Comment No. 6-38

DEIR approach: CEQA says: “A project with an effect that *may* cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.” DEIR cites the following sources: recently re-issued State CEQA guidelines, as well as the CEQA statute itself, and the City of Los Angeles 2006 LA CEQA Thresholds Guide as sources to interpret what the law means.

Each of these documents focuses on, or boils down to 2 questions relative to the demolition and new construction of the “non-contributing” building in the National Register District at 6430–6434 Hollywood Blvd.:

- Is a significant resource being demolished, relocated, or altered? AND/OR
- Is there construction that reduces the integrity of important resources on the site or in the vicinity?

Response to Comment No. 6-38

The Project does not involve demolition, relocation or alteration of a significant resources. Therefore, it is assumed that the commenter is incorrectly asserting that reduction of integrity is the threshold of significance under CEQA. Under the CEQA Guidelines, a reduction in integrity is not the threshold for a significant impact. Rather, a project may cause a substantial adverse change in the significance of a resource when the

significance is materially impaired (CEQA Guidelines Section 15064.5(b)). CEQA Guidelines Section 10564.5(b)(2) defines material impairment as “Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register.” As the Project conforms with the *Secretary’s Standards* it does not result in material impairment to the Hollywood Boulevard historic district (see CEQA Guidelines Section 10564.5(b)(3)). Furthermore, as discussed below in response to comment 6-44, National Register guidance defines integrity as binary; a property either retains sufficient integrity to convey its significance or it does not. As discussed in the Draft EIR and Appendix D.1 (see Draft EIR, Section IV.B, Cultural Resources, pages IV.B-35–36 and Draft EIR, Appendix D.1, Cultural Resources Report, pages 34–35), the Project will not impact the integrity of the Hollywood Boulevard historic district.

Comment No. 6-39

Cited guidelines and thresholds don’t address this Project: These guidelines and thresholds never overtly address the situation here: demolition of a non-contributing building (6430–34 Hollywood Blvd) within this National Register District, and the effect of a new building on that District. The guidelines and thresholds appear to address only material (“physical”) effects when a project involves individual historic buildings, rather than dealing with new infill or neighboring buildings and their effects on historic districts.

Response to Comment No. 6-39

As noted in Response to Comment No. 6-3, above, even though 6430–6434 Hollywood Boulevard was initially constructed during the historic district’s period of significance, it does not retain integrity and therefore does not add to the Hollywood Boulevard historic district’s historic character. Demolition of a non-contributing building does not constitute a material effect on the Hollywood Boulevard historic district.

The CEQA Guidelines clearly address the issue of the impact of new infill construction on a resource, broadly defined as more than just a single building, by requiring an analysis of whether the significance of the Hollywood Boulevard historic district is materially impaired, including the setting of the immediate surrounding area. (CEQA Guidelines Section 15064.5(b).) CEQA Guidelines and Thresholds specifically reference the Secretary’s Standards. The Standards for Rehabilitation, one of the four treatments, is intended to be flexible and adaptable to specific project conditions to balance change while retaining historic building fabric. Preservation Brief 15: New Exterior Additions to Historic Buildings, provides additional guidance on infill buildings in historic district by applying the Secretary’s Standards.

Potential impacts of new construction on Hollywood Boulevard is addressed in the DEIR and Cultural Resources Report (see Draft EIR, Section IV.B, Cultural Resources, page IV.B-35 and Draft EIR Appendix D.1, Cultural Resources Report, page 34). As described in Response to Comment No. 6-3, the proposed new building is compatible with surrounding buildings in terms of in size, scale, proportion, and massing, and conforms with Secretary's Standards 9 and 10. As such the Project does not materially impair the significance of the Hollywood Boulevard historic district.

Comment No. 6-40

1. Direct adverse effects on Attie Building (on project site):

- There is an adverse effect omitted from the DEIR—the effect of blocking windows on the east side of the second floor of the Attie Building. Whether this is significant should be addressed in the FEIR.

Response to Comment No. 6-40

As noted by the commenter, two windows are located in the east elevation of the Attie Building, adjacent to the north façade. These two windows, located on the property line, are proposed to be obscured by the new building. As stated in the Draft EIR and accompanying Cultural Resources Report (see Draft EIR, Section IV.B, Cultural Resources, page IV.B-37 and Draft EIR Appendix D.1, Cultural Resources Report, page 34), new construction conforms with Standard 10, as the new building can be removed in the future without destroying the essential form and integrity of the Attie Building. Should the new building be removed in the future, those two windows would again become visible.

Proposed construction to the property line of the new building retains the historic character and pattern of development of Hollywood Boulevard in conformance with Standard 2. Historic buildings along Hollywood Boulevard are constructed to east and west property lines and many share a party wall with adjacent buildings. Given the variety of building heights and dates of construction, openings along secondary, side elevations are not generally visible where they are extant.

Comment No. 6-41

- The DEIR does look [sic] direct impacts such as that of shoring, drilling and vibration. Page 22 of DEIR states that mitigation measure NOI-MM-2 limits the vibration levels in regards to the Attie, 6430 Hollywood, and Mark Twain Hotel (.12 PPV for Attie, .20 PPV for 6430 Hollywood, .3 PPV for Mark Twain).

Response to Comment No. 6-41

This comment notes that Mitigation Measure NOI-MM-2 addresses vibration impacts at the Attie Building, the 2-story commercial building, and at the Hotel Mark Twain and identifies the warning levels contained for each building in the mitigation measure. See Response to Comment No. 6-19, above. This comment is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment No. 6-42

2. Direct adverse effect of demolition of 6430–34 Hollywood Boulevard:

- **Potential significance:** The DEIR in Appendix D provides a full history of the buildings, and a description of its many remodellings. [sic] It is likely that the conclusion of “not significant” is correct. However, the building was designed by the same Architect for the same client as the Attie Building, at the same time. The automatic conclusion that non-contributors are not significant is a misunderstanding of historic districts. The automatic conclusion that demolition is not an adverse effect hasn’t been conclusively made.

Response to Comment No. 6-42

As detailed in Response to Comment No. 6-3, above, National Register Bulletin 15: *How to Apply the National Register Criteria for Evaluation* notes that “the majority of the components that add to the district’s historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole.” Even though 6430–6434 Hollywood Boulevard was initially constructed during the historic district’s period of significance, it does not retain integrity and therefore it was determined by the Keeper of the National Register that it does not contribute to significance of the Hollywood Boulevard historic district.⁹ As 6430–6434 Hollywood Boulevard does not retain sufficient integrity to contribute to the significance of the historic district, its demolition would not materially alter in an adverse manner the physical characteristics of the historic district that convey historical significance. Therefore, demolition would not cause a substantial change in the significance of the historic district.

Comment No. 6-43

- **Historic Assessment needed:** This building from the Prime Period of the historic district must be assessed for its potential to be treated as a contributing historic

⁹ McAvoy, Christy Johnson, *Hollywood Heritage*, “Hollywood Commercial and Entertainment District,” *National Register of Historic Places Nomination Form*, listed January 2, 1985.

resource. It was included within the historic district boundaries for good reason. Without assessing what physically remains of the building, finding historic and other documentation, and without clearly recognizing the urban pattern—how its size, overall structure, etc [sic] are a contribution to the District, the EIR conclusion of no effect does not have evidentiary support. The juxtaposition of smaller buildings with their larger neighbors at intersections is a character-defining feature of the district as a whole, particularly in the “core” section in which this project is located.

Response to Comment No. 6-43

The Hollywood Boulevard historic district is a long, 12-block linear historic district that generally runs along Hollywood Boulevard. The district is significant for its association with the “Golden Age of Hollywood” as well as for its “eclectic and flamboyant architectural mix.” Of the 102 buildings, 56 percent contribute to the significance.¹⁰ The building located at 6430–6434 Hollywood Boulevard is one of the 44 percent of the buildings that do not contribute to the significance of the historic district. In fact, the National Register nomination includes the property in the list of “buildings which do not contribute to the character of the district.”¹¹ While the original date of construction is during the historic district’s period of significance, there is no integrity left from that period. Based on review of current conditions and historic photographs (see Draft EIR Appendix D.1, Cultural Resources Report, Attachment D, Historic Photographs 1, 4, 7, 8, 10, and 14), there are no physical features remaining from the historic district’s period of significance. The building located at 6430–6434 Hollywood Boulevard does not contribute to the historic district’s significance as a commercial corridor associated with the “Golden Era of Hollywood” or for its “eclectic and flamboyant architectural mix.” The historic district’s character of “high-rise buildings at major intersections, flanked by one and two-story retail structures” will be retained with the new, two-story retail store at 6430–6434 Hollywood Boulevard.

The block of Hollywood Boulevard on which the Attie Building and 6430–6434 Hollywood Boulevard are located is bracketed by two contributing resources, the Attie Building at 6436 Hollywood Boulevard and the Creque Building at 6400 Hollywood Boulevard, the northwest corner of Cahuenga and Hollywood Boulevards. Based on examination of a map of the historic district, included in Draft EIR Appendix D.1, Cultural Resources Report, Map 3, it appears boundaries were drawn to maximize the proportion of contributing resources while maintaining continuity along Hollywood Boulevard. Map 3 reveals city blocks that do not have any contributing resources to the historic district and

¹⁰ McAvoy, Christy Johnson, *Hollywood Heritage*, “Hollywood Commercial and Entertainment District,” *National Register of Historic Places Nomination Form*, listed January 2, 1985.

¹¹ McAvoy, Christy Johnson, *Hollywood Heritage*, “Hollywood Commercial and Entertainment District,” *National Register of Historic Places Nomination Form*, listed January 2, 1985.

were not bookended by contributing resources which were excluded in full or in part from within the boundaries of the historic district. Because the block of Hollywood Boulevard on which the Attie Building and 6430–6434 Hollywood Boulevard are located is bracketed by two contributing resources, it appears the entire block was included within the boundaries of the historic district. There does not appear to be any other reason 6430–6434 Hollywood Boulevard was included within the boundaries and the commenter did not provide additional justification.

Comment No. 6-44

- Changing understanding of non-contributors: In 1985, only buildings built before 1935 which maintained a high degree of architectural integrity could be considered by the Keeper of the Register as contributors to Hollywood Boulevard’s historic district. Guidance on evaluating contributing and non-contributing structures has changed over the years:
 - addition of “aspects of integrity”, [sic] “alterations which have assumed significance over time”, and [sic] “cultural associations” are being more thoroughly explored.
 - massing and construction of these buildings continues to provide information about the retail structure of the District as a whole, and if a formal amendment to the district nomination were to occur, many of these smaller altered structures would be considered contributors.
 - it is unwise to demolish any noncontributor built during the period of significance as the full impact on the district and its history and methods of construction are not entirely known.
 - This is the oldest section of the Boulevard, and the one whose low rise structures show the roots of the business district’s development. While not architecturally interesting, these smaller examples speak to the social and cultural significance of the “Main Street.”

Response to Comment No. 6-44

Integrity considerations have not changed since 1985 such that properties included in the Hollywood Boulevard historic district as non-contributing resources would now be considered contributing resources. The National Park Service first published National Register Bulletin 15 *How to Apply the National Register Criteria for Evaluation* in 1990, codifying prevailing practice. National Register guidance defines integrity as “the ability of a property to convey its significance” and identifies seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. After passage of the

National Historic Preservation Act of 1966, the concept of integrity became binary, either a property retains sufficient integrity to convey its significance or it does not.¹²

A discussion of integrity for 6430–6434 Hollywood Boulevard is included in Draft Appendix D.1, Cultural Resources Report, page 22. The National Register nomination for the Hollywood Boulevard historic district states, regarding the historic district as a whole, “Integrity is fair; the major landmark buildings still retain their distinctive identities, while many of the smaller buildings have been altered, remodeled, or covered with modern signage.”¹³ The National Register nomination further expands on the types and degree of integrity and determines that, despite the fact that “many one and two-story commercial vernacular structures.... Primary façades have been repeatedly remodeled and they have become visually noncontributing.”

Significant alterations were made to the building at 6430–6434 Hollywood Boulevard in 1948, as specified in the Cultural Resources Report (see Draft EIR, Appendix D.1, Cultural Resources Report, pages 19–20). Based on review of current conditions and historic photographs, the building has been substantially altered since the late 1940s. The commenter has not provided any evidence that the alterations contribute to the historic district’s importance in the “Golden Age of Hollywood.” As integrity is based on significance, per National Register Guidance (see *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*), additional, substantive information supported by scholarly research would be required to identify an expanded historic context for Hollywood Boulevard.

If an amendment to the National Register nomination were to be prepared to include additional resources, district contributors would still be required to meet guidance outlined in National Register Bulletin 15: *How to Apply the National Register Criteria for Evaluation*. Specifically, “components that add to the district’s historic character... must possess integrity.” The building at 6430–6434 Hollywood Boulevard does not retain integrity per National Register Bulletin 15, and as discussed in the Draft EIR, and therefore, would not be classified as a contributor by a more contemporary evaluation.

Furthermore, as noted above in Response to Comment No. 6-3, National Register listing does not mean no change can be made without compromising the historical

¹² Sprinkle, John H. Jr., *Crafting Preservation Criteria; The National Register of Historic Places and American Historic Preservation* (New York: Routledge, 2014), page 61.

¹³ McAvoy, Christy Johnson, *Hollywood Heritage*, “Hollywood Commercial and Entertainment District,” *National Register of Historic Places Nomination Form*, listed January 2, 1985.

significance of a district.¹⁴ As discussed above, numerous alterations to 6430–6434 Hollywood Boulevard have been made, in addition to the structure being identified as a non-contributor, demolition would not constitute a significant impact per CEQA. Prohibiting demolition of noncontributing building would, in effect, be freezing the historic district in time. However, because there have been so many alterations to the building at 6430–6434 Hollywood Boulevard, it would be freezing the historic district from when the National Register nomination was prepared and not the period of significance.

The commenter asserts that “this is the oldest section of the Boulevard.” The commenter provides no evidence of this assertion, nor specifies bounds of the “section.” This does not constitute substantial evidence or new information.

Comment No. 6-45

The proposed two story replacement will alter this pattern in a pivotal location to the understanding of the District. Further, the connection of this structure to a larger one outside the District does not reflect the system of alleys and other land use patterns of Hollywood.

Response to Comment No. 6-45

The commenter does not define the “pattern” that will be altered and provides no substantial evidence or new information to corroborate a claim that the proposed new building at 6430–6434 Hollywood Boulevard will destroy a pattern of development. The proposed new building at 6430–6434 Hollywood Boulevard will not destroy a system of alleys. While there may be a system of alleys behind some buildings along Hollywood Boulevard, there is no cohesive, unifying element. The National Register nomination for the Hollywood Boulevard historic district does not identify a system of alleys as a character-defining feature. Historic Sanborn Fire Insurance maps, updated to 1951, show a limited number of alleys behind buildings fronting Hollywood Boulevard, many of which access theater loading docks. There is no alley along the rear, south elevation of 6430–6434 Hollywood Boulevard. While there is an easement for a public alley on a portion of the Project Site, no construction is proposed in this area. The new construction will not destroy a character-defining feature for the historic district.

¹⁴ *Grimmer, Anne E. and Kay D. Weeks, Preservation Brief 14: New Exterior Additions to Historic Buildings: Preservation Concerns, (Washington, DC: U.S. Department of the Interior, National Park Service, 2010), p. 1.*

Comment No. 6-46

3. **Adverse effect of new infill construction on District:** HHI agrees with Appendix D that the Secretary of the Interior Standards underlie any analysis of the effect of the proposed Hollywood/Wilcox construction on the Hollywood Boulevard Historic District.. [sic] However we disagree with the argument in Appendix D that only a design which renders an eligible historic resource ineligible can be the cause of a significant adverse effect under CEQA. This clearly is the wrong threshold for the situation here—saying an entire mile long historic District must lose its eligibility due to this one project or new building!

Response to Comment No. 6-46

This comment addresses the affects of infill development on historic resources. Refer to Response to Comment Nos. 6-3, 6-18, 6-37, 6-38, and 6-39, above.

Comment No. 6-47

- HHI believes the new building does reduce the integrity of the District. With a re-design of the building a District-compatible building is possible.

Response to Comment No. 6-47

According to CEQA Guidelines Section 15064.5(4)(b), the threshold for a significant impact to a historical resource is if a proposed project were to cause a substantial adverse change in the significance of an historical resource. A substantial adverse change is defined as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.” Impacts to the setting of the historic district were studied in the Draft EIR and accompanying Cultural Resources Report (see Draft EIR, Section IV.B, Cultural Resources, pages IV.B-35–36 and Draft EIR, Appendix D.1, Cultural Resources Report, pages 34–35) and none were identified as causing material impairment to the significance of the historic district.

National Register Bulletin 15, *How to Apply the National Register Criteria for Evaluation* refers to integrity as the ability of a property to convey its significance (see also Appendix D-1, page 4). Evaluation of integrity is based on “an understanding of a property’s physical features and how they relate to its significance.” The National Register recognizes seven aspects or qualities of integrity: location, design, setting, materials, workmanship, feeling, and association. To retain integrity, a property must possess several, and usually most, of these aspects.

The new building at 6430–6434 Hollywood Boulevard will not impact the integrity of the Hollywood Boulevard historic district. Specifically, the new building will not change the *location* of the historic district nor will it change the *design*, which is characterized by high-rise buildings at major intersections with one- and two-story retail buildings mid-block. The proposed new building at 6430–6434 Hollywood Boulevard will be two-stories in height and will be compatible with surrounding buildings in size, scale, proportion, and massing. The new building will not change the *setting* of the historic district, which is defined as the “relationship between building and other features.” The new building will infill a parcel that currently contains a one-story building and will not change relationships between buildings. As the proposed new building will replace a non-contributing resource, it will not destroy integrity of *materials* or *workmanship*. Integrity of *feeling*, or “the [historic district’s] expression of the aesthetic or historic sense of a particular period of time,” will be retained. As the new building at 6430–6434 Hollywood Boulevard will replace a non-contributing resource to the historic district, it will not change the overall historic district’s expression of an aesthetic or historic sense. Finally, the historic district will continue to convey its significant *association* with the “Golden Age of Hollywood” through the contributing resources along Hollywood Boulevard.

Nevertheless, this comment will be forwarded to the decision makers for their review and consideration.

Comment No. 6-48

- The new building at 6430–34 Hollywood is proposed as infill in the Hollywood Boulevard Historic District, and must comply with Standards # 9 and 10, which are more deeply explored in the National Park Service Preservation Brief #14.

Response to Comment No. 6-48

An evaluation of how the proposed new building at 6430–6434 Hollywood Boulevard conforms with *Secretary’s Standards* 9 and 10 is included in the Draft EIR and accompanying Cultural Resources Report (see Draft EIR Section IV.B, Cultural Resources page IV.B-35 and Draft EIR Appendix D.1, Cultural Resources Report, page 34). The new building was found to be compatible under the Standards.

Comment No. 6-49

- In the case of a new infill building in the District, discussion of “materially impaired” should look at “those physical characteristics of an historical resources *and districts (inserted by this writer) [emphasis added indicates the portion added by the commenter to the referenced standard]* that justified “its inclusion in, or eligibility for, inclusion in the California Register” and query

whether the new infill building—if it had been present at the time of the district boundaries—would have qualified as a district contributor at that time.

Response to Comment No. 6-49

As noted in Response to Comment No. 6-3, above, an evaluation of how the proposed new building on Hollywood Boulevard conforms with the *Secretary's Standards* 9 and 10 is provided in Draft EIR and Cultural Resources Report (see Draft EIR Section IV.B, Cultural Resources page IV.B-35 and Draft EIR Appendix D.1, Cultural Resources Report, page 34). *Preservation Brief 14: New Exterior Additions to Historic Buildings: Preservation Concerns*, expands on Rehabilitation Standards 9 and 10, two of the 10 rehabilitation standards that deal specifically with additions. If a new infill building could be confused as a contributing resource to a historic district, this design would be in direct opposition to Standard 9, which requires “the new work will be differentiated from the old.” The comment suggests an analysis that is not required and would only be conjecture, in addition to adding additional language to an established standard. As discussed in the Draft EIR, the Project would not result in significant impacts to cultural resources. However, the historic district is a mix of simpler buildings and larger more iconic structures such as the seven-story Security Trust Building at the northeast corner of Hollywood and Cahuenga Boulevards, and the 12-story Guaranty Building, located a short distance away from the Attie Building at the northeast corner of Hollywood Boulevard and Ivar Avenue as well as a mix of design and styles, including a Beaux Arts style at the Security Trust Building and Spanish Renaissance Revival at the Warner Theater at the northeast corner of Hollywood Boulevard and Wilcox Avenue. If by “present at the time of the district boundaries,” the commenter means built in 1935 and still retaining integrity in 1985, it is possible that it would have been a contributor. Otherwise, it would likely have not been a contributor, just as the existing building and 44 percent of the other buildings were not contributors in 1985. Those non-contributors did not sufficiently impair the significance of the district to prevent the Keeper of the National Register from listing the historic district in the National Register. Therefore, it would appear that even if the new building had been present at the time of the determination of the boundaries of the historic district and was determined to be a non-contributor, the Keeper would have nonetheless listed the historic district.

Comment No. 6-50

- The DEIR failed to provide a clear architectural description of the materials, scale, and styles of the “resource”—in this case the District. Vague statements about “heights vary” are lazy and misleading. This District has distinct urban patterning, captured in the nomination—its low rise buildings form consistent building line storefronts, providing a pedestrian-friendly shopping [sic] street ambiance, protected by awnings; the tall “height limit” bank and office buildings generally mark main north/south streets.

Response to Comment No. 6-50

Characteristics of the Hollywood Boulevard historic district are described in the Cultural Resources Report (see Draft EIR, Appendix D.1, Cultural Resources Report, pages 8, 11, and 34). Specifically, page 8 of the Cultural Resources Report quotes directly from the National Register nomination for the Hollywood Boulevard historic district. As gathered from the National Register nomination, character-defining features of the Hollywood Boulevard historic district include long linearity, excellent examples of popular architectural styles, high-rise buildings at major intersections, one and two-story retail structures mid-block, construction between 1915 and 1939, and features such as “colored terrazo [sic] entryways, neon signage, and the Hollywood Walk of Fame,”¹⁵

Comment No. 6-51

- Preservation Brief #14 states that the building height is the most important aspect of compatibility. In this case the choice made for height is compatible enough if the infill building has been justified.

Response to Comment No. 6-51

The commenter’s characterization of Preservation Brief #14 is incorrect. Preservation Brief #14 mentions that height is one consideration of compatibility. Specifically, “[h]eight and setback from the street should generally be consistent with those of the historic building and other surrounding buildings in the district.”¹⁶ The new building at 6430–6434 Hollywood Boulevard is proposed to be two stories. As described in the Cultural Resources Report, Hollywood Boulevard consists of commercial buildings that vary greatly in height, from one to 12-stories (see Draft EIR Appendix D.1, Cultural Resources Report, page 34). As correctly noted by the commenter, the height of the proposed new building at 6430–6434 Hollywood Boulevard is consistent with the adjacent Attie Building, and compatible with building heights in the Hollywood Boulevard historic district.

Comment No. 6-52

- The design error in the proposed new infill building is the expression of the building as 2 story attention-getting, bright, building-high frames, infilled with

¹⁵ McAvoy, Christy Johnson, *Hollywood Heritage*, “Hollywood Commercial and Entertainment District,” *National Register of Historic Places Nomination Form*, listed January 2, 1985.

¹⁶ Grimmer, Anne E. and Kay D. Weeks, *Preservation Brief 14: New Exterior Additions to Historic Buildings: Preservation Concerns*, (Washington, DC: U.S. Department of the Interior, National Park Service, 2010), p. 11.

curtain-wall like glazing. The effect is Rodeo Drive in 2000. The District clearly has side-walk level storefront usually on a bulkhead, and 2nd floor punched openings, clearly distinguished. The District has tangible, stone-like (“lithic”) materials. The District stylistically has a predominance of certain styles in the low rise sections.

Response to Comment No. 6-52

The commenter’s opinion as to the approach to compatibility of the proposed new building will be forwarded to the decision makers for their review and consideration. The Draft EIR analyzed the proposed new building at 6430–6434 Hollywood Boulevard and found it to conform with the *Secretary’s Standards*, specifically Standards 9 and 10, as the new building is compatible in size, scale, proportion, and massing with the adjacent Attie Building. (See Draft EIR Section IV.B, Cultural Resources, page IV.B-35 and Draft EIR Appendix D.1, Cultural Resources Report, page 34). As observed in Preservation Brief #14, “[t]he vast amount of literature on the subject of additions to historic buildings reflects widespread interest as well as divergence of opinions.”¹⁷ Steven W. Semes, in his oft quoted article from the Summer 2007 *National Trust for Historic Preservation Forum Journal*, entitled “Differentiated and Compatible: Four Strategies for Additions in Historic Settings,” lays out four approaches of compatibility that meet the *Secretary’s Standards*: (1) literal replication; (2) invention within the same or a related style; (3) abstract reference; and (4) intentional opposition.

Nonetheless certain minor design changes have been incorporated into the Project in response to public comment, as indicated on Appendix FEIR-3 of this Final EIR. (See also Section III, Revisions, Clarifications, and Corrections to the Draft EIR, of this Final EIR, all of which are analyzed in this Final EIR and, as discussed above, were found not to result in an impact to historical resources.. Specifically, the new commercial building adjacent to the Attie Building was modified to distinctly relate to the vertical rhythm and three-bay form of the Attie Building, through a series of alternating thick and thinner fins and the fenestration was reduced to provide more solid design articulation. The material was changed to plaster to match the color and texture of the Attie Building and many of the other historical storefronts in the neighborhood. The updated design of the mixed-use building exhibits a distinctive, but discreetly regulated shifting 2-story grid pattern utilizing earth tone colors, which relate to the Attie Building. The grid sections of the façade are complimented by a recessed vertical volume with a mostly glass façade and balcony railings, wrapping the upper portion of the northwest corner, which will reflect and provide views of the Hollywood hills. These two distinctive façade designs help break up the

¹⁷ *Grimmer, Anne E. and Kay D. Weeks, Preservation Brief 14: New Exterior Additions to Historic Buildings: Preservation Concerns, (Washington, DC: U.S. Department of the Interior, National Park Service, 2010), p. 1.*

massing. The design of the southern elevation of the building was shifted to the north, creating additional stepped-down landscaped terraces, softening the architecture facing, and increasing the separation from, the Hotel Mark Twain.

See also Response to Comment No. 5 above.

Comment No. 6-53

1993 UDP: The City of Los Angeles is now responsible for reviewing infill buildings in this historic district, pursuant to the transfer of responsibilities from CRA. The intent of having a published Urban Design Plan was to take away any inkling of arbitrariness in design review, giving clear cut standards for new infill buildings to follow. This Projects proponents fought the adoption of a less stringent Urban Design Plan in 2019, so for the moment the 1993 Plan prepared by CRA and reviewed by its Board must be used in order to assess conformity with the Redevelopment Plan.

Response to Comment No. 6-53

As noted above in Response to Comment No. 6-9, no design plan has been adopted that affects the Project Site. The 1993 Urban Design Plan was a draft plan.

In any case, the revised Project design is consistent with the 1993 draft Urban Design Plan. See Response to Comment Nos. 6-54 and 6-60, below.

Further application of the 1993 draft Urban Design Plan beyond the extent explained in Response to Comment Nos. 6-54 and 6-60, below, would not be consistent with: (1) other land use plans of the City, such as the Citywide Design Guidelines, Walkability Checklist, and Hollywood Community which apply here, with regard to: design guidance for overall design and pedestrian orientation, development regulations outlined in the community Plan, and the intent of the Hollywood Center in the Community Plan; or (2) the Housing Crisis Act of 2019 which precludes imposition of subjective design standards established after January 1, 2020. Nonetheless, the Project complies generally with the purpose, intent, and provisions of the General Plan, by providing new mixed income housing and ground floor commercial space in a Regional Center, adjacent to transit, while restoring a historic structure. Compliance with the provisions of AB 900 also advances many of the City's goals for private development projects, reducing VMT, providing jobs, and superior environmental performance. Thus, the City exercises its discretion not to apply the draft Design Plan to this Project in these regards.

Comment No. 6-54

The 1993 Urban Design Plan reflected the actual urban patterning of the Boulevard. It locates the Attie Building and the infill building in the "Main Street" and "Boulevard Mixed

Use” portion of the Plan. When written, this Plan jived with the zoning which remains in place today.

Feature	1993 Design Guidelines	Proposed Design	Complies?
Height		Approx 45'	Yes
Material	Stone, terra cotta glazed to resemble stone, brick, cementitious materials (Sec. 7.5.A)	Doesn't say? Likely cementitious materials	Yes
Color	Light color palette—earth tones, creamy pastels, highlighted by brighter and darker accent colors (Sec. 7.5.A)	White, no accent colors	No
Opacity	“between heights of 3 and 12 feet, storefront areas should be a minimum of 60% clear glass. storefronts should incorporate transoms of clear glass and/or detailed fascias” Sec 7.4.A.6 (pg. 7-21)	Over 60% clear glass	Yes—
	Upper floors		
Glazing	Use of clear glass is strongly encouraged but glazed areas should be differentiated in color from building's surface materials (7.5.B)	No differentiation	No
Facade Depth	Boulevard buildings are typically articulated by windows which are punched in solid masonry or masonry-like surfaces while other elements, such as sills or ornaments, create contrasting areas of light and shadow” Sec 7.4.A.3 (pg. 7-16)	Not punched windows	No
Storefront	“overall proportion of a storefronts should be approximately square and should have a maximum ratio of 1.5 feet of height for each foot of length”	??	No
	“the design of recessed entries to storefronts... is strongly encourages [sic] with new infill construction” (7.4.A.6 (pg. 7-16) [sic]	Not recessed	No

Response to Comment No. 6-54

See Response to Comment No. 6-53, above, regarding the fact that the draft 1993 Urban Design Plan referenced by the commenter was never adopted and is therefore not applicable to the Project Site. Notwithstanding, in response to public comment, the Project design has been modified as detailed in Response to Comment No. 6-52, above. Although under no obligation to comply with the unadopted draft 1993 Urban Design Plan, a number of the modifications address the alleged non-compliance set forth in the commenter's table. Below is a revised version of the table based on the Project design modifications. The column titled “Original Proposed Design” is the commenter's assessment of the original design which isn't always accurate:

Feature	1993 Design Guidelines	Original Proposed Design [Commenter Narrative]	Modified Proposed Design	Complies?
Height		Approx 45'	Allowed height = 45' Proposed height = 34' from adjacent grade, similar to the Attie Building.	Yes
Material	Stone, terra cotta glazed to resemble stone, brick, cementitious materials (Sec. 7.5.A)	Doesn't say? Likely cementitious materials	Cementitious plaster, matching the color and texture of the Attie Building.	Yes
Color	Light color palette—earth tones, creamy pastels, highlighted by brighter and darker accent colors (Sec. 7.5.A)	White, no accent colors	Creamy gray pastel color, resembling the Attie Building pilasters.	Yes
Opacity	"between heights of 3 and 12 feet, storefront areas should be a minimum of 60% clear glass. Storefronts should incorporate transoms of clear glass and/or detailed fascias" Sec 7.4.A.6 (pg. 7-21)	Over 60% clear glass	At least 60 percent of the storefront façade is clear glass.	Yes
	Upper floors			
Glazing	Use of clear glass is strongly encouraged but glazed areas should be differentiated in color from building's surface materials (7.5.B)	No differentiation	Façade storefront is clear glass, which is clearly different in color and texture from the darker colored materials of the solid surface.	Yes
Façade Depth	Boulevard buildings are typically articulated by windows which are punched in solid masonry or masonry-like surfaces while other elements, such as sills or ornaments, create contrasting areas of light and shadow" Sec 7.4.A.3 (pg. 7-16)	Not punched windows	The alternating thicker and thinner columns/pilasters do give a sense of "façade depth" and create areas of light and shadow, as the doors are recessed in.	Yes
Storefront	"overall proportion of a storefronts should be approximately square and should have a maximum ratio of 1.5 feet of height for each foot of length"	??	The storefront is divided into three bays. Each bay has an approximate proportion ratio of 1:1.5, while keeping in line with the adjacent Attie Building.	Yes, while maintaining the proportions of the Attie Building.
	"the design of recessed entries to storefronts... is strongly encourages [sic] with new infill construction" (7.4.A.6 (pg. 7-16) [sic]	Not recessed	Entrances to the storefront are recessed from the face of the building.	Yes

Furthermore, while the Draft EIR was not required to provide a consistency analysis with either the 1993 draft of 2019 draft Urban Design Plan, as set forth in Response to Comment No. 9, above, even if the Project was subject to these plans, a project does not need to be in perfect conformity with each and every policy contained in an applicable plan. More specifically, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*, state law does not require an exact match between a project and the applicable general plan. Rather, to be “consistent,” the project must be “compatible with the objectives, policies, general land uses, and programs specified in the applicable plan,” meaning that a project must be in “agreement or harmony” with the applicable plan to be consistent with that plan. Based on the revised Project design, should it be required to do so, the Project would be consistent with the 1993 draft Urban Design Plan.

Comment No. 6-55

Attachment #3

DETAILED DISCUSSIONS

Impact of New Construction (1624-44Wilcox) [sic] on Historic District And Mark Twain Hotel

Impact of New Construction on an Historic District:

On page 42 of the Executive Summary, the DEIR poses that the new construction may have indirect impacts on the Hollywood Boulevard historic district as a whole.

- Is there construction that reduces the integrity of important resources on the site or in the vicinity?

Response to Comment No. 6-55

This comment cites a statement on Draft EIR Section I, Executive Summary, page 42 which reads “[a]s the proposed development consists of new construction immediately adjacent to identified historic resources, specifically the Hollywood Boulevard Commercial and Entertainment District as a whole and the Attie Building specifically, there is the potential for indirect impacts to the setting of historical resources.” This sentence is only intended to introduce the indirect impacts analysis. The discussion goes on to define what an indirect impact under CEQA is and provides a thorough analysis of potential indirect impacts to the Hollywood Boulevard Commercial and Entertainment District. As analyzed therein and indicated on Draft EIR Section I, Executive Summary, page 43, indirect impacts would be less than significant. See also Draft EIR, Section IV.B, Cultural Resources, pages IV.B-35–36 and Draft EIR, Appendix D.1, Cultural Resources Report, pages 34–35.

Comment No. 6-56

CEQA threshold: Again Hollywood Heritage disagrees with the argument in Appendix D that only a design which renders an eligible historic resource ineligible can be the cause of a significant adverse effect under CEQA. This clearly is the wrong threshold for the situation here—saying an entire mile long District must lose its eligibility due to this one project or new building!

Response to Comment No. 6-56

See Response to Comment No. 6-46.

Comment No. 6-57

Help comes in the form of Federal guidelines, implemented by the State of California. The vicinity to be evaluated is defined in 36 CFR § 800.16 as the: “geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking” [sic]

Response to Comment No. 6-57

The commenter cites Federal guidelines implementing Section 106 of the Historic Preservation Act which requires Federal agencies to take into account the effects of their undertakings on historic properties. As there is no Federal undertaking—the property is not owned in part or whole by a Federal Agency, and no Federal funds are proposed to be used in development of the project—these guidelines are not applicable.

As the project was not analyzed under Section 106 of the National Historic Preservation Act, no Area of Potential Effects (APE) was explicitly identified. However, Map 4 of Draft EIR Appendix D.1, Cultural Resources Report, identifies a portion of the Hollywood Boulevard historic district, identifying contributing resources. The smaller area roughly covers one city block to the east and west of the Attie Building. Potential direct and indirect impacts to the setting of nearby contributing resources to the historic district, as well as the U.S. Post Office located at 1615 Wilcox Avenue and separately listed in the National Register, is discussed in Draft EIR, Appendix D.1, Cultural Resource Report, pages 34–35. Had the Project been subject to Section 106, effects on historical resources within a theoretical APE would have been considered.

Potential indirect and cumulative impacts of the Project were analyzed in the Draft EIR and Cultural Resources Report (see Draft EIR, Section IV.B, Cultural Resources, pages IV.B-35–36 and Draft EIR, Appendix D.1, Cultural Resources Report, pages 34–36).

All related projects within one block of the Hollywood Boulevard historic district were considered in the analysis of cumulative impacts.

Comment No. 6-58

Again, as in the discussion of the infill building in the District, the guidance comes from the Secretary of the Interior Standards, especially Standard 39, and the discussions in Preservation Brief # 14. The predominant effect which can be significant and adverse is height.

Response to Comment No. 6-58

It appears that the commenter is referring to Standard 9. See Response to Comment No. 6-51 above.

Comment No. 6-59

There are generally recognized principles for threshold effect on historic districts:

- Cutting a district in half (visually or physically) so it loses continuity as a District;
- Overshadowing or lopsiding [sic] a District with new construction so its principal formal structure is compromised (such as overshadowing or removing a church on a New England town square);
- Creating such an offence or a distraction—such as with billboards, wild colors, large amounts of glass, above grade parking garages, unadorned walls, etc—that [sic] the continuity and features of a District are obscured.

This project crosses these usual thresholds for significant adverse effect. As in the analysis of the new infill building, the effect of on the District was not analyzed in the DEIR from a position of specificity about the District's architectural qualities. *The FEIR must include and urban design description of the urban patterning and qualities of the District, and evaluation of the current design—300% height, attention-getting, bold colors, random frenetic pattern, unrelenting bulk in 2 directions, non-natural color, etc. Either the design is significantly corrected, or the project has a significant adverse effect.*

Response to Comment No. 6-59

The commenter does not include a citation for their “generally recognized principles.” These principles are not included within any National Park Service guidance associated with application of the *Secretary's Standards*.

The CEQA threshold for determining a significant impact to historic resources is whether a project would cause a substantial adverse change in the significance of an historical resource. A substantial adverse change is defined in CEQA Guidelines Section 15064.5(4)(b)(1), as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.” Indirect impacts of the new building on the setting of the adjacent to the Hollywood Boulevard historic district were analyzed in the Draft EIR and Cultural Resources Report (see Draft EIR, Section IV.B, Cultural Resources, pages IV.B-35–36 and Draft EIR, Appendix D.1, Cultural Resources Report, pages 34–35). No indirect impacts were identified.

Even if the factors referenced by the commenter were thresholds for determining significant impacts, the Project does not meet them. The Project includes construction of a new building within the Hollywood Boulevard historic district that is compatible in size, scale, proportion, and massing, and construction of a new building outside the boundaries of the historic district. Neither would cut the historic district in half, either visually or physically. The Hollywood Boulevard historic district is a long, linear historic district. It does not have one principal building. Rather, as noted previously, it is characterized by high-rise buildings at major intersections with one and two-story retail structures mid-block. As noted in Draft EIR Appendix D.1, Cultural Resources Report, page 34, given the variety of heights of contributing buildings on Hollywood Boulevard, new construction along Wilcox Avenue will not overshadow or lop side the historic district. Located outside the boundaries of the historic district, it is not out of scale with the varied heights along Hollywood Boulevard. Finally, the Project will not “create such an offence...that the continuity and features of a District are obscured.” The Project does not include any of the offensive examples cited; there are no proposed new billboards, no wild colors, no large expanses of uninterrupted glass, no above grade parking garages, and no unadorned walls. Located outside the boundaries of the historic district, the Project will not obscure any significant features.

As described in Response to Comment No. 6-47, the Project does not compromise the integrity of the Hollywood Boulevard historic district.

Comment No. 6-60

RESPONSE:

1993 UDP: Again, as discussed in the analysis of the infill building, the guidance provided by the 1993 Urban Design Plan illustrates how the proposed building design is a significant adverse effect on the Boulevard Historic District.

The 1993 Urban Design Plan reflected the actual urban patterning of the Boulevard. It locates the Attie Building and the infill building in the “Boulevard South” and “Residential Mixed Use” portion of the Plan.

Feature	1993 Design Guidelines	Proposed Design	Complies?
Density	2:1 or 118,780 sf	278,692 sf	No
Height	75'	160'	No
Material	Stone, terra cotta glazed to resemble stone, brick, cementitious materials (Sec. 7.5.A)	Consists of a fiber cement “outer skin” wall and an inner skin that reveals the buildings’ fenestrations (Appendix D, site plan review supplemental, pg. 15)	No
Color	Light color palette—earth tones, creamy pastels, highlighted by brighter and darker accent colors (Sec. 7.5.A)	White walls with “prominent bands of color” in yellow ,red, and orange and metallic accents (Appendix D, site plan review supplemental, pg. 34)	No
Modulation	“To maintain the small scale built form pattern which evolved based upon the original parcelization, street facades should not exceed 100 ft in length unless separate by a 10 ft deep by 20 ft court or setback at each inhabitable level” (Sec 7.4.B.1)	Facade is one monolithic block for over 200’—which does not reflect the two underlying lots it occupies or meet guidelines	No
Facade depth	“Each wall surface shall incorporate facade depth through the use of individual windows set into the walls surface, facade surface breaks, shadow lines, articulation of edges reveals, change in material and ornamentation” (Sec 7.4.B.3)	Windows treated as planes or panels, not as individual windows set into walls. No articulation of edges.	No
Balconies	“should [sic] be integral to a building’s form and mass and should be a minor element in the definition of a building’s character		No

Response to Comment No. 6-60

See Response to Comment No. 6-54, above. In addition, the commenter’s table has been updated to reflect the modified design and appropriate compliance determinations. Thus, based on the revised Project design, should it be required to do so, the Project would be consistent with the 1993 draft Urban Design Plan. The column titled “Original Proposed Design” is the commenter’s assessment of the original design which isn’t always accurate

Feature	1993 Design Guidelines	Original Proposed Design [Commenter Narrative]	Modified Project Design	Complies?
Density	2:1 or 118,780 sf	278,692 sf	278,692 sf	Not applicable; the draft Design Guidelines do not establish a maximum density; the Project is permitted 4.5:1 with approval of a Vesting Zone/Height District change. The Project would be consistent with the base FAR of 4.5:1 permitted under the Regional Center Commercial land use designation in the Redevelopment Plan that applies to the Project Site.
Height	75'	160'	125 feet then stepping up to 160 feet	Not applicable; the draft Design Guidelines do not establish a maximum height. New development would be stepped back from Hollywood Boulevard and transition from 45 feet along Hollywood Boulevard to 125 feet, and then to a maximum of 160 feet within the southern portion of the Project Site.
Material	Stone, terra cotta glazed to resemble stone, brick, cementitious materials (Sec. 7.5.A)	Consists of a fiber cement "outer skin" wall and an inner skin that reveals the buildings' fenestrations (Appendix D, site plan review supplemental, pg. 15)	Façade type A: vertical panels of cementitious material (fiber cement precast) on "outer skin" with glass railing balconies. Façade type B: would be almost fully glazed with aluminum cladding to cover structure, with glass railing balconies.	Yes, complies; Project façade includes glass and fiber cement "cementitious material" panel.
Color	Light color palette—earth tones, creamy pastels, highlighted by brighter and darker accent	White walls with "prominent bands of color" in yellow, red, and orange and metallic accents (Appendix D, site plan review	Primarily the building would be a lighter earth tone with darker color aluminum accent cladding.	Yes

Feature	1993 Design Guidelines	Original Proposed Design [Commenter Narrative]	Modified Project Design	Complies?
	colors (Sec. 7.5.A)	supplemental, pg. 34)		
Modulation	"To maintain the small scale built form pattern which evolved based upon the original parcelization, street façades should not exceed 100 ft in length unless separate by a 10 ft deep by 20 ft court or setback at each inhabitable level" (Sec 7.4.B.1)	Facade is one monolithic block for over 200'— which does not reflect the two underlying lots it occupies or meet guidelines	At ground level, the building is broken into three modules of less than 100 feet each to enhance the pedestrian experience. The first module to the south is at the lounge area before the building pushes back 10 feet at the residential lobby. The façade is then broken by the parking entrance. To the north is a commercial façade which is less than 100 feet. Above the ground floor, the building is broken down into three clearly distinguished volumes that have a linear length of less than 100 feet. The middle volume is set back from the street 10 feet as well as the other volumes, and has a different façade with glazing and hanging balconies, while maintaining a similar rhythm and proportions.	Yes
Façade Depth	"Each wall surface shall incorporate facade depth through the use of individual windows set into the walls surface, facade surface breaks, shadow lines, articulation of edges reveals, change in material and ornamentation" (Sec 7.4.B.3)	Windows treated as planes or panels, not as individual windows set into walls. No articulation of edges.	Approximately half the building is designed with vertical panels that shift every two floors. The colonnade panels define an outer plane. The balconies are recessed from the panels and further recessed are the balcony doors and windows, which creates façade depth. The remainder of the building is comprised of a glass and metal cladding façade with protruded balconies and glass railings. When this design element is adjacent to the panel façade it is recessed approximately	Yes

Feature	1993 Design Guidelines	Original Proposed Design [Commenter Narrative]	Modified Project Design	Complies?
			10 feet which also creates façade depth.	
Balconies	“should [sic] be integral to a building’s form and mass and should be a minor element in the definition of a building’s character		Approximately half the building has balconies that are recessed from an outer vertical panel façade which shifts every two floors and are integral to the building’s form. The remaining balconies are protruding from the glass and metal cladding façade. These balconies are continuous with minor breaks which creates a horizontal shift and are integral to the building’s form.	Yes

Comment No. 6-61

Impact of New Building on Mark Twain Hotel:

The Mark Twain Hotel, at 1622 Wilcox Ave, is a 1921 Spanish Revival with a rare Mission motif, located immediately south of the Project .

The structure was recently identified as a 3CS/5S3 in the CRA/Architectural Resources Group Hollywood Historic Resources Survey 2019. It is a significant property associated with the African American community in Los Angeles, being the last remaining hotel listed in the Green Book, an African American travel guide, between 1949 and 1961. This property was one of relatively few hotels where African American travelers were welcome prior to the Civil Rights movement.

Direct effects from construction vibration and excavation will be required to protect the physical building from adverse effect.

Response to Comment No. 6-61

See Response to Comment No. 6-5, above.

Comment No. 6-62

The design of a massively tall unbroken concrete or otherwise solid wall along the south project property line, plus the damage of the construction period, will be a severe adverse

impact on this structure. The 1993 Urban Design Plan additionally requires that portions of parking structures visible from public sidewalks and streets shall comply with the built form policies, standards, and guidelines.



Response to Comment No. 6-62

See Response to Comment Nos. 6-9 and 6-53, above. Regarding parking, the at-grade and above grade parking levels would be screened from public view. As disclosed in Draft EIR Section II, Project Description, page II-11:

Parking would be provided within five levels including two subterranean levels, one at-grade level, and two above-grade levels. The at-grade and two above-grade parking levels would be centrally located within the Project Site and would be screened from public view by the commercial uses along Hollywood Boulevard and by the commercial uses, residential amenities, and residential uses along Wilcox Avenue.

Comment No. 6-63**Attachment #4****DETAILED DISCUSSIONS****Land Use**

Quantitative Background: The project has assembled a site with 2 parcels fronting on Hollywood Boulevard (6340–44 and 6356–40 Hollywood Boulevard) and 4 additional parcels. Two of those parcels have existing buildings 1624 Wilcox and 1626–28 Wilcox.

1. **Parcel Area:** The area of the parcels calculates at 59,390 sf using City records. There appear to be 3 sources of errors or complications. The land area reported in the DEIR is higher. The Project appears to show construction on a 15' varying width easement along Wilcox which not "owned" by the developer. The Easement # 94-135253 must be explained. The Assessor and the City Public Works Department do not show this as a part of the property owned by the developer.

Response to Comment No. 6-63

The commenter does not raise any environmental concerns with this comment. In any event, as set forth on the Project's architectural plans on file with the City, and based on a recent survey of the Project Site, which is more accurate than City ZIMAS or Assessor records, the current net lot area is 59,933 sf. (See Appendix FEIR-4 of this Final EIR.) In connection with the Project's requested vesting tentative tract map, an approximately 15-foot-wide strip of land (which pursuant to the City's Mobility Plan 2035, represents an existing over-dedication of Wilcox Avenue) is proposed to be merged into the Project Site, resulting in a total lot area of 61,976 sf.

Comment No. 6-64

2. **Allowable Density:** The Land Use section of the DEIR states that the developer requests an FAR of 4.5:1. The current zoning allows 2:1.

The DEIR omits all the needed facts and figures to understand the project; the land parcel sizes; the proposed unit mix; the parking calculation, etc. The FEIR must accurately present the Project.

Response to Comment No. 6-64

The commenter does not raise any environmental concerns with this comment, nevertheless, the Draft EIR provides all of the requested information in Section II, Project Description. The specific components of the Project relevant to a topic area are laid out in each section (unit mix, number of bedrooms, etc.). The Project Description has been updated to include the lot area square footage in addition to the acreage. See Final EIR

Section III, Revisions, Clarifications, and Corrections, pages III-4–5. As per PRC Section 21099(d)(1), the Project’s aesthetics and parking impacts shall not be considered significant impacts on the environment.” Therefore, the Draft EIR accurately presents the Project.

Comment No. 6-65

The DEIR underplays the most important facts about entitlements:

- that the current zoning of “2D” allows a 2:1 FAR—not the 4.5:1 proposed on the combined lot areas, or as erroneously stated on page 8 an “allowed” 6:1. To reach 4.5:1, the “D” condition must be removed—by conformance with the CRA’s Redevelopment Plan, Boulevard Urban Design Plan, and Transportation Plan. These are not addressed or evaluated in the DEIR. The developer may purchase and transfer development rights for the requested 2.5 X density.

Response to Comment No. 6-65

This comment does not raise any environmental concerns. This comment will be forwarded to the Decision Makers for their consideration.

Comment No. 6-66

- that the R5 density claimed for residential density in the Hollywood Community Plan literally does not exist. The Community Plan “High” density category is 60-80 DU/acre. The 1988 Community Plan allowed R5 uses on specific parcels—the City has been mistakenly interpreting this as R5 densities.

Response to Comment No. 6-66

This comment does not raise any environmental concerns. This comment will be forwarded to the Decision Makers for their consideration.

Comment No. 6-67

- Project density in this case exceed maximums under the Community Plan and Redevelopment Plan

	Area	Allowed Zone	Allowed Density per Zoning	Requested	Allowed/ Requested Height UDP
6430–4 Hwd BI	6,513 sf	C4-2D-SN	2:1 = 13,026 sf	9,000 sf	45/
6436–40 Hwd BI	6,487 sf	“	2:1 = 12,974 sf	12,974 sf	45/
1644 Wilcox	12,727 sf	C4-2D-SN			75/160

	Area	Allowed Zone	Allowed Density per Zoning	Requested	Allowed/ Requested Height UDP
No address	4,410 sf				"
1634 Wilcox	12,737 sf				"
1626 Wilcox	12,466 sf				"
1624 Wilcox	3,819 sf				45/160'
	59,390 sf		118,780 sf	278,692 sf	

	Area	Dwelling Units	DU/Acre Request	DU/Acre HCP	DU/Acre CRA
Residential	261,092 sf	260	260/1.363 = 190	80 max	80 max 130 max*
Other	17,800 sf				
Retail	11,020 sf				
Office	3,580 sf				
Restaurant	3,200 sf				
	278,692 sf				

*if compatible in character, scale, and architecture of the neighborhood (Sec 505.1 Redevelopment Plan)

Response to Comment No. 6-67

This comment does not raise any environmental concerns, in addition to claiming the project must comply with unadopted plans. This comment will be forwarded to the Decision Makers for their consideration.

Comment No. 6-68

Zoning:

- Inadequate discussion of clearing of D condition: As noted above, *the FEIR must accurately state the findings that City Planning and the Redevelopment Agency must make in order to clear "D" condition.*

Response to Comment No. 6-68

This comment does not raise any environmental concerns. The entitlement requests are the purview of the local agency, not CEQA. Any land use findings would be made by the lead agency in their adopted land use entitlement process, not a Final EIR. This comment will be forwarded to the Decision Makers for their consideration.

Comment No. 6-69

“Workforce Housing” as a substitute for affordable housing: The DEIR proposes setting aside “up to 10 percent” of units for workforce housing. The gesture of an undetermined percentage of workforce housing units does not contribute to City policies meant to ameliorate the impacts of the affordable housing crisis.

The Project Description fails to specify the income level at which these units will be offered, or even an exact percentage of units.

- The Los Angeles Housing and Community Investment Department (LAHCID), defines workforce housing as 150% Area Medium Income (AMI) (Appendix 1.1).
- Given the extreme nature of the housing crisis and the disproportionate impact on low- income people, workforce housing has not been named a City priority.
- The 2018–2023 Assessment of Fair Housing 2018–2023 Fair Housing Goals and Priorities of City of Los Angeles & HACLA Los Angeles “encourage[ing] [sic] developers to produce affordable housing in new housing developments” as one of the City’s highest housing priorities (Goal 1.1). It reports that with 713,710 households under the 80% AMI threshold, Los Angeles “has a significant shortage of housing affordable to lower-income households.”
- The 2014–2021 Regional Housing Needs Assessment (RHNA), another guiding document for housing development does not set allocations for workforce housing.
- A 2019 study from the Embarcadero Institute reveals that Los Angeles county met 23% of its low-income housing RHNA target for 2018, (approving only 10,826 of the expected 47,935 units), but surpassed their market rate housing target by 207%.

Response to Comment No. 6-69

This comment does not raise any environmental concerns. The Draft EIR does include the percentage of workforce units, 10 percent of the total units, in Section II, Project Description. This comment will be forwarded to the Decision Makers for their consideration.

Comment No. 6-70**Failure to meet Redevelopment Plan Goals**

The proposed project appears to exceed an FAR than 4.5:1 as stated, but the true question is why—given current zoning, is a discussion of 4.5:1 pertinent? The 4.5:1 is NOT an entitlement.

Response to Comment No. 6-70

This comment does not raise any environmental concerns. A clarification to the lot size has been added in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, of this Final EIR. Nevertheless, this comment will be forwarded to the Decision Makers for their consideration. Comment No. 6-71

The DEIR on page 86 claims conformance with Redevelopment Plan goals in Section 300. That Section of the Redevelopment Plan did not transfer to the City of Los Angeles.

The FEIR must analyze the Redevelopment Plan Land Use Section, and the compliance of this Project with the quantitative and procedural parts accepted by the City, rather than declare compliance with goals.

Response to Comment No. 6-71

See Response to Comment No. 6-11, above, regarding the Redevelopment Plan entitlement approval. As indicated therein, the Redevelopment Plan is not a plan that was adopted “for the purpose of avoiding or mitigating an environmental effect (Appendix G, IX (b)) and therefore the Draft EIR consistency analysis was for informational purposes only.

Comment No. 6-72

Parking: The Project is described as having 420 parking spaces. The unit breakdown does not appear to be included in the EIR, nor the parking calculation. Pg. 4 of the Transportation chapter says, because the project is in a transit priority zone “the Project’s aesthetics and parking impacts shall not be considered significant impacts on the environment” pursuant to PRC Section 210999.

The FEIR should show how parking is calculated, and how the Project is offering the 15% improvement, and ensure the spaces are “unbundled” per agreement.

This table shows how parking calculations might have been reached, suggesting that parking is provided at normal rates. (The Redevelopment Area, which has always been transit rich, has always allowed a reduction in parking spaces.) [sic]

	Area	Dwelling Units	Parking/x	Est Redev	Est Standard
Residential	261,092 sf	260	Unclear unit mix— assume 1 BR-	325 spaces	390 spaces
Other	17,800 sf		1/500 sf	35.6 spaces	35.6 spaces
Retail	11,020 sf				
Office	3,580 sf				
Restaurant	3,200 sf				
	278,692 sf			410.6 spaces	425.6 sp

Response to Comment No. 6-72

As per PRC Section 21099(d)(1), the Project’s aesthetics and parking impacts shall not be considered significant impacts on the environment.” Thus, parking did not need to be analyzed as a CEQA impact issue.

However, the Draft EIR does contain the requested information. The unit breakdown requested by the commenter is located in Draft EIR Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, page IV.K.1-32, Table IV.K.1-5: 20 studios, 140 one-bedroom units, 87 two-bedroom units, and 13 three-bedroom units. Specific parking calculations are contained in Draft EIR Appendix O.1, Traffic Study, at pages 99–103 which demonstrate that the net code parking requirement is 417 automobile spaces; the Project is providing 420, three more than is required.

Regarding the “15% improvement” it is understood that the commenter is referring to the AB 900 requirement that the Project will achieve at least 15 percent greater transportation efficiency, as defined in PRC Section 21180(c). The determination of 15 percent efficiency for AB 900 purposes is provided in the AB 900 approved application—Draft EIR, Appendix B, pages 8–10. In addition, the Project is subject to Project Design Feature TR-PDF-2 which requires the implementation of a Transportation Demand Management Program to reduce peak-hour vehicular traffic to and from the Project Site by 15 percent. (Draft EIR, Section IV.I, Transportation, pages IV.I-25–26.)

Regarding unbundled parking, that commitment is a requirement in the Project’s AB 900 approval and will also be included as an enforceable project condition of approval.

Comment No. 6-73

As the Project is being constructed on parking lots which have been used to support existing businesses in the Boulevard historic District, and as CRA studies have shown a shortfall of roughly 500 spaces in this mid- section of Hollywood Boulevard, Hollywood

Heritage recommends that in order to deliver on public benefit the Project provide an equal number of parking spaces for the general public as are being removed from the surface lot.

Response to Comment No. 6-73

The Project is only required to meet the LAMC code parking requirements for its proposed uses, not off-site uses. Off-site uses are required to provide their own parking, as applicable. See Response to Comment No. 6-62, above.

Comment No. 6-74

Attachment #4

DETAILED DISCUSSIONS

Environmentally Superior Alternative

Alternative 2: Zoning Compliant Mixed-Use Alternative

- Developed in accordance with existing C4-2D-SN zoning with FAR limitation of 2:0:1. This would develop 123,952 sqft of uses instead of 278,892.
- Would retain but not restore the Attie
- Uses would be 125 units (no workforce housing) and 14,600 sqft for retail and 3,200 for restaurant (less retail and no office, compared to proposed), 15,000 open space
- 222 parking spaces, .5 ground level and 2 above ground (no 10% reduction in parking compared to proposal)
- New buildings between 1–8 stories, max height 90 ft
- Would not seek certification under AB 900 Jobs and Econ improvement thru environmental leadership

Response to Comment No. 6-74

This comment, which summarizes Alternative 2, is noted for the record and will be forwarded to the decision makers for their review and consideration.

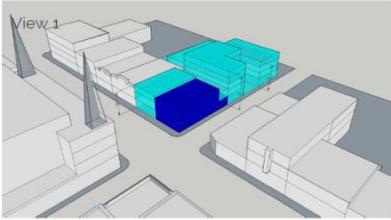
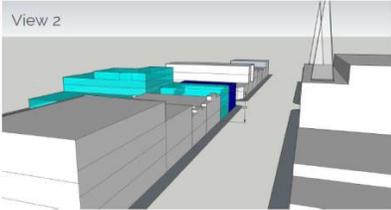
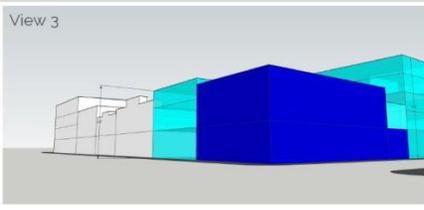
Comment No. 6-75**Alternative 5: Proposed Hollywood Community Plan Update Complaint Mixed-Use Alternative**

- Under the Proposed Hollywood Community Plan Update the project site would be designated a Regional Commercial Center with a zoning designation of C4-2D-CPIO with FAR limitation of 3:1 and max height of 75 ft
- Would retain but not restore the Attie
- 127,375 sqft of new use—123 multi-family housing units (no workforce housing), 14,600 sqft for retail and 3,200 for restaurant, 14,375 open space
- New buildings between 1 and 7 stories, max height 75 ft
- 222 parking spaces, 1 subterranean level, .5 ground level and 1 above ground (no 10% reduction in parking compared to proposal)
- Would not seek certification under AB 900 Jobs and Econ improvement thru environmental leadership
- Does not say if they would keep 6434 Hollywood

Response to Comment No. 6-75

This comment summarizes Alternative 5 but incorrectly states that 123 multi-family residential units were analyzed. The correct number is 124. With respect to the question regarding 6434 Hollywood Boulevard, similar to the Project, all of the alternatives would remove the non-historic structures on the Project Site. This comment is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment No. 6-76

HISTORIC RESOURCES	ZONING & USES	BUILT FORM	PUBLIC REALM
		<p>MASSING</p> <p>By-Right: 45 feet & FAR 2:1</p> <p>GBA: 119,109 sq ft</p> <p>Maximum Height: 55 ft</p>	
		<p>Density Bonus with Affordable Housing</p> <p>Resulting FAR 2.7:1 (Including Density Bonus)</p> <p>Includes open space along Wilcox</p>	
			

Response to Comment No. 6-76

This comment, which consists solely of a graphic and does not include an explanation, appears to show a proposed alternative to the Project. A full range of Alternatives, including three zoning compliant and one Community Plan Update compliant alternatives were evaluated in Section V, Alternatives, of the Draft EIR. As noted in Response to Comment No. 6-18, above, analysis of additional alternatives is not required.

Comment Letter No. 7

Margot Gerber
President
Art Deco Society Los Angeles
P.O. Box 972
Hollywood, CA 90078-0972

Comment No. 7-1

The **Art Deco Society of Los Angeles** appreciates this opportunity to submit comments to the **Hollywood and Wilcox Project**. The Project includes the Art Deco style “Attie” Building (6436–6440 Hollywood Blvd and 1646–1648 Wilcox).

Response to Comment No. 7-1

This introductory comment is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment No. 7-2

Attie Building Restoration:

1. The proposed storefronts restoration is inappropriate. Design improvement is warranted.

Response to Comment No. 7-2

The comment states an opinion that will be forwarded to the decision-makers for their review and consideration. Regarding restoration of the storefronts, refer to Response to Comment Nos. 6-2, 6-16, 6-29, 6-30, 6-32, 6-33, 6-34, 6-50, and 6-52, above.

Comment No. 7-3

2. Specificity of restoration work and scheduling must be determined. None is provided.

Response to Comment No. 7-3

See Response to Comment No. 6-30, above.

Comment No. 7-4**Attie Building Necessary Mitigation Measures:**

1. MM3: (Cultural Resources) Alterations/Restoration/Rehabilitation shall be Monitored by a qualified Historic Architect.

Response to Comment No. 7-4

The Project conforms with the Secretary's Standards, therefore mitigation is not required. See Response to Comment Nos. 6-16, 6-17, 6-30, and 6-52, above

Comment No. 7-5

2. MM2: (Cultural Resources) Preservation Plan: The Attie Building will be submitted for City of Los Angeles Historic-Cultural Monument consideration; with inclusion of Preservation Plan demonstrating Secretary of the Interior Standards-Compliant Attie Building storefront reconstruction.

The Historic-Cultural Monument nomination will be accepted by the Cultural Heritage Commission for consideration prior to the start of any demolition associated with the Hollywood and WilCox [sic] Project, including any alterations on the Attie Building itself.

Response to Comment No. 7-5

The Draft EIR was reviewed by the Office of Historic Resources prior to its release and their comments were incorporated. Additionally, as noted above in Response to Comment No. 7-4, the Project conforms with the Secretary's Standards, therefore mitigation is not required. Further, the nomination of the Attie Building is not required under CEQA. See Response to Comment Nos. 6-16, 6-17, 6-30, 6-52, and 7-4, above.

Comment No. 7-6**Attie Building Restoration**

The Attie Building (6436–6440 Hollywood Boulevard) is an identified Historic Resource. Appendix D cites the listing as a 1D, being a contributing structure to the Hollywood Boulevard Commercial and Entertainment Historic District listed on the National Register of Historic Places and the California Register.

The Attie Building's Art Deco style, designed by Henry Minton (a prolific architect for Bank of Italy/Bank of America buildings), was built in 1931. The prime period of the District ends

in 1939. The Attie Building Restoration should focus on the building appearance up to 1939.

Response to Comment No. 7-6

This comment, which provides an overview of the Attie Building, will be forwarded to the decision makers for their review and consideration.

Comment No. 7-7

Section IV Cultural Resources of the DEIR evaluates the proposed restoration:

Conclusion: the Attie Building is eligible as a City of Los Angeles Historic-Cultural Monument.

Response to Comment No. 7-7

This comment, which states that the Attie Building is eligible as a City of Los Angeles Historic Cultural Monument, is noted for the record and will be forwarded to the decision makers for their review and consideration. As discussed above in Response to Comment No. 6-27, the Attie Building is a contributing resource to the National Register listed Hollywood Boulevard Commercial and Entertainment Historic District. Because the historic district is listed in the National Register, it was automatically listed in the California Register. In general, CEQA Guidelines define "historical resource" that which has been determined eligible for listing in the California Register, or one that is designated at the local level (§15964.5). As the Attie Building is listed in the California Register, it was identified as a historical resource under CEQA. An evaluation of eligibility as a Historic Cultural Monument is not required to identify a historical resource.

Comment No. 7-8

The report FAILS to provide description of the proposed Restoration/Rehabilitation. A commitment to Restoration/Rehabilitation must be ingrained within the Project Description

Response to Comment No. 7-8

See Response to Comment Nos. 6-2 and 6-30, above. Additionally, a clear description of the retention and restoration of the Attie Building is included as part of the Project Description on the cover page of the Draft EIR, as well as Section II, Project Description. Additionally, as discussed above in Response to Comment No. 6-16, restoration of the Attie Building in accordance with the Secretary's Standards is now included as Project Design Feature CUL-PDF-1.

Comment No. 7-9

Storefront on Wilcox: Page IV.B-32 of the DEIR states that no physical evidence of the storefronts exists, and no physical evidence of earlier storefronts was revealed.

In fact, photographic evidence from 1934 clearly depicts a sign band, awnings (thus confirming an awning pocket), and by implication storefront windows on Wilcox.

Storefront existed in keeping with the terra cotta pilasters on Hollywood Boulevard: the report itself shows that the structural column lines inside align with the larger terra cotta pilasters on the Hollywood Boulevard building front. This suggests that the Attie Building matched every other terra cotta building of its time period—with columns roughly 16' on center at the front of the building, likely clad in terra cotta, or located immediately behind the glass.

Photo evidence from 1933, 1934 and 1938 confirm that when the single bank tenant divided into 2 tenants, the signage split at the terra cotta pilaster line. Through 1939 the column lines came to the ground.

Response to Comment No. 7-9

See Response to Comments Nos. 6-2 and 6-32, above.

Comment No. 7-10

The Art Deco Society of Los Angeles looks forward to providing its unique expertise to the Project Developer, toward completion of the best possible outcome for the Art Deco Attie Building Restoration/Rehabilitation.

Response to Comment No. 7-10

This comment, which concludes the letter, is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment Letter No. 8

Adrian Scott Fine
Director of Advocacy
Los Angeles Conservancy
523 W. Sixth St., Ste. 826
Los Angeles, CA 90014-1248

Comment No. 8-1

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Hollywood and Wilcox Project (Project) Draft Environmental Impact Report (DEIR). The Conservancy, along with Hollywood Heritage, has long been active in protecting and advocating for the historic resources within the National Register-listed Hollywood Boulevard Commercial and Entertainment District where the proposed Project is located.

The Project, as stated in the DEIR will include a 15-story mixed-use building along Wilcox Avenue. New construction will comprise 260 multi-family residences, as well as office and commercial space. In addition to the mixed-use tower along Wilcox Avenue, the Project proposes to construct a new building at 6430–6438 West Hollywood Boulevard, thereby introducing new infill construction within the National Register-listed historic district. The final component of the Project includes the rehabilitation of the historic Attie Building located on the southeast corner of Hollywood Boulevard and Wilcox Avenue.

Response to Comment No. 8-1

This introductory comment, which correctly summarizes the Project Description, is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment No. 8-2**I. Rehabilitation of the Attie Building**

The Conservancy greatly appreciates the Project team's commitment to rehabilitate the district contributor Attie Building. Constructed in 1931 in the Art Deco Style, the Attie Building is a contributor to the National Register-listed historic district under criterion C/3/3 for architecture with a period of significance of 1931–1939.

The mural, painted on the west façade has been found to be potentially significant as a subsequent alteration, one of the oldest and last surviving murals in Hollywood from the

early 1980s. The *You Are A Star* mural was painted in preparation for the 1984 Summer Olympics.

Response to Comment No. 8-2

This comment, which provides an overview of the Attie Building and You Are The Star mural, is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment No. 8-3

As stated in DEIR the Attie Building will be rehabilitated in conformance with the *Secretary of the Interior Standards for Rehabilitation*. We strongly believe it is necessary for the Project team to submit a historic preservation plan for review and approval by the Office of Historic Resources before construction begins. A detailed plan will provide the applicant with a comprehensive guide for rehabilitation work ensuring full compliance with the Secretary's Standards.

Response to Comment No. 8-3

CEQA Guidelines Section 15064.5(b)(3) states, “[g]enerally, a project that follows the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource.” As detailed in the Draft EIR, the Project conforms with the Secretary’s Standards (see Draft EIR Section IV.B, Cultural Resources, pages IV.B-33–37 and Draft EIR Appendix D.1, Cultural Resources Report, pages 30–37). The Draft EIR analyzed the proposed new building at 6430–6434 Hollywood Boulevard and found it to conform with the Secretary’s Standards, specifically Standards 9 and 10, as the new building is compatible in size, scale, proportion, and massing with the adjacent Attie Building. (See Draft EIR Section IV.B, Cultural Resources, page IV.B-35 and Draft EIR Appendix D.1, Cultural Resources Report, page 34.) While the rehabilitation of the Attie Building proposed by the Project conforms with the Secretary of the Interior’s Standards for Rehabilitation, the Applicant nonetheless has proposed design refinements in response to concerns stated by commenters and the rehabilitation of the Attie Building in accordance with the Secretary’s Standards is now included as Project Design Feature CUL-PDF-1 (see Section III, Revisions, Clarifications, and Corrections to the Draft EIR, of this Final EIR).

See Response to Comment Nos. 6-16, 6-17, 6-30, 6-52, and 7-4, above.

Comment No. 8-4**II. Conclusion**

In conclusion, the Conservancy feels it necessary for the Applicant to have a completed and approved historic preservation plan before the rehabilitation of the Attie Building begins. As development continues in and around the National Register Hollywood Boulevard Commercial and Entertainment District, it is vital to protect the district's resources that help convey the Boulevard's feeling and setting. It is essential to find the appropriate balance between new construction and the historic built environment. The Conservancy encourages the applicant to contact us so that we may work together in conjunction with Hollywood Heritage to achieve a project outcome that is sensitive to the surrounding historic environment.

Response to Comment No. 8-4

The comment states a conclusion and will be forwarded to the decision-makers for their review and consideration.

Comment No. 8-5**About the Los Angeles Conservancy:**

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 6,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

Response to Comment No. 8-5

This comment, which concludes the letter and provides a point of contact, will be forwarded to the decision makers for their review and consideration.

Comment Letter No. 9

BA Letofsky
latview@aol.com

Comment No. 9-1

This looks like one of the buildings they house forced labor workers to live in in China. It's Ugly and awful and doesn't belong. Can we get the tax dollars spent to hire the architect back please?

Response to Comment No. 9-1

This comment, which expresses dissatisfaction with the Project's design and does not raise CEQA issues, is noted for the record and will be forwarded to the decision makers for their review and consideration.