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Supplemental Comments on Paramount Pictures Project (“Project”)
CEQA No.: ENV-2011-2460-EIR (“EIR”)
Council Files 16-0876, 16-0876-S1, 16-0876-S2, 16-0876-S3, 16-0876-S4
Address: 5555 Melrose Avenue, Los Angeles, CA

Dear Councilmembers:

Two key issues, alluded to in prior comments and discussions, are worth highlighting to the full Council.

First, the Specific Plan and EIR allow future owners to choose among multiple locations for a *single* 150-foot office tower. One alternative site for this tower is right by Plymouth Gate and the historic KCal building (“Plymouth Alternative Site”). As explained in prior comments, the Plymouth Gate is narrow and relies on a fire access road, thus raising traffic congestion, intrusion, and emergency access impairment concerns. Further, the Plymouth Alternative Site would cause the 150-foot office tower to loom over the historic KCal building and surrounding 1-2 story (largely residential) buildings in a historic zone. The Plymouth Alternative Site thus imposes aesthetic and cultural historic impacts, as well as significant air quality, noise/vibration, traffic intrusion, and other transportation impacts on the surrounding community. It is a particularly impacting location.

Other sites for the 150-foot tower, expressly approved in the Specific Plan and EIR, are available along a long swath in the Main Lot on Melrose, roughly between the Bronson Gate and Van Ness (“Bronson Alternative Sites”). The Bronson-Van Ness stretch allows for more than one footprint that could accommodate a 150-foot tower. On this stretch, the tower would be across from (a) the new multi-story parking structure on the S. Bronson Lot and (b) the 5-story Raleigh Studios industrial area. The commercial and residential area across Van Ness is not historic. This area across Van Ness also could be much farther removed from the 150-foot tower than the 1-2 story historic buildings across from the Plymouth Alternative Site -- especially if the proposed 150-foot tower is located on the western portion of the Bronson Alternative Sites.

In sum, the Bronson Alternative Sites are much less impacting, on their face, than the Plymouth Alternative Site. Yet the EIR and associated Findings ignore this self-evident, feasible opportunity to provide a less impacting alternative, and reduce and mitigate aesthetic, cultural/historic, transportation, noise/vibration, and air quality impacts.

Second, the community remains deeply concerned about transportation impacts that are ignored or underreported in the EIR. This stems at least in part from the intrinsically flawed nature of the transportation study relied on in the EIR. That study ignores what makes this particular Project Site virtually unique in Hollywood and the immediately surrounding areas: there is no east-west

bound public street for at least one-half mile. North of Melrose, between Gower and Van Ness, one has to travel a full half mile to Santa Monica Blvd. before one can cross east-west. The following screenshot comes from Google Maps:



Nowhere does the transportation study adjust its presumptions or methods of calculations, let alone the final tallies of vehicle trips and other projections, to reflect this extraordinary situation.

We respectfully request you decline to certify the EIR or approve the Project, for the reasons provided above and in our prior comments and appeals.

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By _____
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