Hermosa Beach Office
Phone: (310) 798-2400

San Diego Office
Phone: (858) 999-0070
Phone: (619) 940-4522

Chatten-Brown, Carstens & Minteer LLP
2200 Pacific Coast Highway, Suite 318
Hermosa Beach, CA 90254
www.cbcearthlaw.com

Douglas Carstens
Email Address:
dpc@cbcearthlaw.com
Direct Dial:
310-798-2400 Ext. 1

January 14, 2019

Date 01/15/2019
Submitted in PLUM Committee
Council File Nos 18-1088 & 18-1088-S1
Item Nos 12 & 13
Communication from Appellant

Planning and Land Use Management Committee
Los Angeles City Council
200 North Spring Street
Los Angeles, CA 90012

Re: Objection to Approval of Vesting Tentative Tract Map (VTM) No. VTT-73568-1A, CPC-2015-2025-DB-MCUP-CU-SPR, and ENV-2015-2026-EIR- Crossroads Project; PLUM Agenda Tuesday, January 15, 2019, Item 12

Honorable Councilmembers:

On behalf of Livable LA and AIDS Healthcare Foundation, we have objected to the approval of the above-entitled Crossroads project (Project) on various grounds including failure to provide adequate affordable housing, failure to analyze and mitigate environmental impacts, and violation of Los Angeles Municipal Code and other requirements. The City staff report recommending denial of our appeal was released on January 10, 2019. Without waiving any of the other objections, below we expand upon why the City's violation of affordable housing requirements if the Project is approved as currently proposed with only 105 units of affordable housing requires granting of the appeal. The Project would be built in a redevelopment area and take advantage of redevelopment agency funding. The Project would include 950 units of residential housing, but is proposed with a mere 105 (11%) affordable units. It would also demolish 84 units of rent stabilized housing that must be preserved to comply with the City's municipal code and relevant community plan.

To comply with the Hollywood Redevelopment Plan's and Municipal Code's minimum requirements, the Project must provide at least 15% affordable units (143 units), or 30% affordable units (286 units) if CRA/LA is providing funding for the Project. In addition, it must provide a right of return for tenants who would be displaced from their current residences subject to the rent stabilization ordinance (RSO). In contrast with these minimal requirements, the Project currently proposes to set aside a miserly 105 units for affordable housing, and improperly seeks to restrict certain of those units to returning renters that qualify rather than provide separate units for those renters.

The Project must be denied as proposed and if approval is further considered, it may only be on the basis of a Project that includes a greater amount of affordable housing.

Additionally, impacts to air quality, traffic circulation, and historic resources have been understated and remain unmitigated. The appeal should be granted and these impacts must be adequately analyzed and mitigated.

A. The Project Fails to Provide the Amount of Affordable Housing Required by the Hollywood Redevelopment Plan.

In the Hollywood Redevelopment Plan area, the Redevelopment Plan requires that *all* project proponents, whether public or private, provide at least 15% affordable units in any proposed housing development. If the Redevelopment Agency is participating in the project, then the requirement for inclusion of affordable housing increases to 30%.

The requirement for the provision of affordable housing within the Redevelopment Plan area at a level of 30% for project the Redevelopment Agency participates in and 15% for privately sponsored projects is fundamental, mandatory, and clear. The Redevelopment Plan states:

> *At least thirty percent (30%) of all new or rehabilitated dwelling units developed within the Project Area by the Agency, if any, shall be for persons and families of low or moderate income*; and of such thirty percent, not less than fifty percent (50%) thereof shall be for very low income households.
> *At least fifteen percent (15%) of all new or rehabilitated units developed within the Project Area by public or private entities or persons other than the Agency shall be for persons and families of low or moderate income*; and of such fifteen percent, not less than forty percent (40%) thereof shall be for very low income households.

(Hollywood Redevelopment Plan, P. 17, section 410.4, emphasis added.) In addition to the Redevelopment Plan requirements, Community Redevelopment Law requires 30% and 15% set asides. (Govt. Code section 33413 subds. (b) (1) and (b)(2)(A)(i).)[1]

---

[1] The Supreme Court has noted the Legislature has explicitly required that new residential development in redevelopment areas include affordable units:

> Furthermore, with respect to two geographic categories—redevelopment areas and the coastal zone—the Legislature has enacted statutes *explicitly directing that new residential development within such areas include affordable housing units*. See

Contrary to these requirements, the Project proponent seeks to provide a mere 105 units of affordable housing out of the 950 that would be constructed.

On an areawide basis, the City has fallen short of its obligation to produce low/moderate income units and has a deficit of at least 331 Low/Moderate Income Units according to the May 15, 2008 "5-Year Implementation Plan (2009-2013)." (Enclosure 1, Plan p. 32.) Therefore, whether the project is considered alone or as part of an areawide requirement, the City fails to meet its obligations to produce sufficient low/moderate income units. By setting aside Very Low Income units, the Project is not producing any low or moderate income units at all.

The proposed Project fails miserably to meet Redevelopment Plan and other requirements as it provides a miserly 11% affordable units by setting aside only 105 units for affordable housing. To provide 15% would require setting aside 143 affordable units. To provide 30% would require setting aside 286 affordable units. Even for those units the Project proponent purports to set aside, it improperly seeks to set conditions on that violate Los Angeles' municipal code.

In the Vesting Tract Map staff report, the City Planning department incorrectly claims the Project to be consistent with the Hollywood Redevelopment Plan because it is not required to supply 30% affordable units. (Staff report, pp. 113-115; EIR, pp. IV.H-8 to IV.H-11.) CRA-LA provides substantial funding for area improvements that assist the Project. (Enclosure 1, pp. 15-19 [community facilities and public improvements].) Therefore, the Project must be regarded as being developed "by the Agency" within the meaning of section 410.4 to the extent such funding benefits it and must provide 30% affordable units. Even if the Project is not directly using CRA funds the City's claim of consistency is not valid because the Project fails to supply at least fifteen percent of new units for "persons and families of low or moderate income." While the Project purports to set aside some units for Very Low Income persons and families, it does not set aside any at all for low or moderate income persons or families.

The Project must be consistent with the general plan and with the redevelopment plan. (Govt. Code § 65300.5; *Families Unafraid to Uphold Rural Etc. County v. Board*

Health & Saf.Code, § 33413, subd. (b)(1), (2)(A)(i) [redevelopment areas]; Gov.Code, § 65590, subd. (d) [coastal zone].)

(*California Building Industry Assn. v. City of San Jose* (2015) 61 Cal.4th 435, 445–446, emphasis added.)

of Supervisors, supra, 62 Cal.App.4th at p. 1336.) A project is inconsistent if it conflicts with a plan policy that is fundamental, mandatory, and clear. (*Families Unafraid to Uphold Rural Etc. County v. Board of Supervisors, supra,* 62 Cal.App.4th. at pp. 1341-1342.) The Government Code mandates that if a proposed tentative map is inconsistent with General Plan policies the City "shall deny approval" of it. (Govt. Code § 66474.)

In *Families Unafraid to Uphold Rural El Dorado County v. El Dorado County Bd. of Sup'rs* (1998) 62 Cal.App.4th 1332 (*FUTURE*) the court found a project approval was inconsistent with a County's general plan. A policy requiring contiguous development in *FUTURE* was fundamental, mandatory, and clear, and the proposed development was clearly in violation of the policy because it was not contiguous to previously developed land. (*Id.* at 1341-1342.) Therefore, the court concluded that based on the project's inconsistency with this one general plan policy, the findings of such consistency were not supported by substantial evidence, and the approval violated the Government Code. (*Ibid.*) Furthermore, in *FUTURE*, the court dismissed the County of El Dorado's argument that the "inconsistency with simply one general plan policy should not be enough to scuttle a project." (*Id.* at 1341.) As in *FUTURE*, the court in *San Bernardino Valley Audubon Society, Inc. v. County of San Bernardino* (1984) 155 Cal.App.3d 738 found a project "inconsistent with a general plan because it conflicted with one policy in the conservation element" (*FUTURE, supra* 62 Cal.App.4th at 1341, citing *San Bernardino Valley Audubon Society, Inc. supra* 155 Cal.App.3d at 753).

The Project must be denied unless it is revised to include at least 15 percent, or if it is a CRA supported project then 30 percent units of affordable housing because it is located in a Redevelopment Plan area. The Project may not be approved as currently proposed with only 105 units of affordable housing.

B. Other Projects Have Been Required To Provide This Kind Of Inclusionary Zoning.

The City's inclusionary housing requirement for redevelopment areas is necessary to address the City and California's dire affordable housing situation. When recently reviewing a proposed project by Sapphire Equity LLC, the City Planning Commission required 15% affordable units pursuant to a specific plan in Condition of Approval No. 15 (Condition 15).[2] The project proponent in that case objected to the inclusionary

[2] The Sapphire Equity project case number is APCC-2015-3032-SPE-SPPA-SPP-MSC and project address is 1101-1135 W, 6th St.: 1324-1342 W 5th St.: 517-521 S Bixel St. The City Council file number is 18-0289.

affordable housing requirement. In their view, the case of *Palmer v. City of Los Angeles* should be interpreted to mean the City may not enforce its inclusionary housing requirements. The attorneys for the project proponent asserted "in 2009, Specific Plan Section 11.C's inclusionary housing provisions and in-lieu fee were held preempted by state law and thus void as applied to rental units in *Palmer/Sixth Street Properties, L.P. v. City of Los Angeles* (2009) 175 Cal.App.4th 1396,1412 *("Palmer).*"

The view that affordable housing requirements are preempted by state law is wrong[3] and inapplicable to the present case, which does not involve the specific plan provision that was challenged in the *Palmer* case. The Hollywood Redevelopment Plan's inclusionary housing requirement was not invalidated by the *Palmer* case and remains a valid and applicable legal requirement.

The Final EIR's response to comments (Response 22-17 on page II-292) states:

> The comment incorrectly asserts the Project does not meet the Redevelopment Plan's requirement for affordable housing. Section 401.4 [sic] of the Redevelopment Plan requires 30 percent of all new housing developed by the CRA-LA to be affordable. This requirement does not apply to a private project.

(FEIR Response 22-17 on page II-292.)

This Response to Comments is misleading and wrong because section 410.4 of the Redevelopment Plan requires *any* housing project developing units in the plan area, including private projects, to include at least 15% affordable units. The Project fails to meet these requirements.

Furthermore, the view that the City's inclusionary requirements are preempted is wrong because as a matter of law, the decision in the *Palmer* case was specifically addressed by legislation enacted to supersede its result. (See City Planning Department staff report for Sapphire Equity LLC project at

---

[3] The City Planning Commission agreed inclusionary housing requirements were valid and could be applied, as was reported in the press. (https://la.curbed.com/2018/3/1/17062478/inclusionary-zoning-los-angeles-affordable-housing-requirements). The City Planning Department's staff report provided an extensive explanation of the continued applicability of inclusionary housing requirements. (http://clkrep.lacity.org/onlinedocs/2018/18-0289_misc_5-22-18.pdf)

http://clkrep.lacity.org/onlinedocs/2018/18-0289_misc_5-22-18.pdf.) The Sapphire project staff report states:

> In September 2017, a State Law passed changing this [*Palmer* lawsuit preventing enforcement of specific plan inclusionary housing requirement]. Assembly Bill No. 1505 was adopted, which reaffirms the right of a legislative body of any county or city to adopt ordinances to require inclusionary affordable housing, as a condition of development of residential rental units, that the development include a certain percentage of residential rental units affordable to, and occupied by, moderate-income, lower income, very low income, or extremely low income households or by persons and families of low or moderate income, as specified, and would declare the intent of the Legislature in adding this provision.
>
> > *(e) The Legislature declares its intent in adding subdivision (g) to Section 65850 of the Government Code, pursuant to Section 1 of this act, to supersede the holding and dicta in the court decision of Palmer/Sixth Street Properties, L.P. v. City of Los Angeles (2009) 175 Cal.App.4th 1396 to the extent that the decision conflicts with a local jurisdiction's authority to impose inclusionary housing ordinances pursuant to subdivision (g) of Section 65850 of the Government Code, as added pursuant to Section 1 of this act.*
>
> AB 1505 became effective January 1, 2018. All applicants with projects that were not vested through a vesting tract map, other vesting entitlement, or filing of plan check with LADBS have been notified of the fact that the inclusionary requirement in the Plan is now applicable to their project.

(Sapphire project staff report, p. P-1.) Since inclusionary housing requirements are a valid legislative enactment, the Hollywood Redevelopment Plan's requirements for inclusion of affordable housing are applicable to the Project and must be adhered to.

C. The Project Proponent Can Not Guarantee Units Set Aside to Meet Affordable Housing Requirements of the Redevelopment Plan and Density Bonus Law Will Be Provided to Returning Renters as Required by the LAMC RSO Right of Return.

Because of the City's RSO, the Project proponent is obligated to provide a right of return to existing renters who would like to return to the same location. (LAMC section 151.27; Rent Adjustment Commission Regulations (RACR) section 716.03 ["The

temporary relocation of a tenant … shall not constitute the voluntary vacating of that rental unit and shall not terminate the status and rights of a tenant, including the right to reoccupy the tenant's rental unit upon the completion of the Primary Renovation Work."])

As the LA Tenants' Union- Hollywood Local wrote to the City on or about November 1, 2018, the Project approval letter of determination clearly states that low-income units would be held for right of refusal to any tenants who qualify for them. Returning tenants do not necessarily qualify for the units as the qualification for affordable units for Very Low Income tenants contain strict income restrictions. (http://home.hacla.org/applyforph.)[4] The returning tenants displaced from their current homes would not have the legal right to cut to the front of the line for Very Low Income units at the Project site. (Admissions and Continued Occupancy Policy[5], p. 12 ["Local Preferences" procedures provide preferences for eligible parties such as students and minimum wage workers but no preferences listed for returning tenants].)

A true right of return as required by the Municipal Code section 151.27 would have no qualifiers or other hurdles set by the developer. This right of return must be provided for at least 60 families still residing on the premises which will be held separately from the "affordable" units held in order for the developer to obtain a density bonus.

The Project proponent improperly seeks to meet its legal obligation to provide a right of return required by the RSO by carving out a number of units from the 105 units of affordable housing that it proposes would be provided and reserving those for returning renters. This is an improper attempt to double count affordable housing set asides by meeting two different legal obligations with set asides of the same units.

---

[4] Very Low Income income limits are significantly lower than low income limits. For example, for a household of three, the Very Low Income limit is $43,650 but the Low Income limit is $69,750. (http://home.hacla.org/applyforph.)

[5] http://home.hacla.org/Portals/0/Attachments/HS/2018%20%20201-01%20FOR%20POSTING.pdf?ver=2018-02-05-091430-993

The nature of doublecounting units was accurately reported in the press as "chipping away" at the number of affordable units that would be required as part of the Project[6]:

> But Sunset Las Palmas tenants who meet the affordable housing requirements will get affordable units instead of RSO-equivalent apartments. *That could chip away at the number of affordable units that would have otherwise been offered to non-Sunset Las Palmas tenants.*
>
> That's why commissioner Renee Dake Wilson wanted the developer to agree to add 82 more affordable units to the project.
>
> But the majority of the commission didn't back her up;

(https://la.curbed.com/2018/9/14/17856572/crossroads-of-the-world-redevelopment-rent-control-housing, emphasis added.)[7]

The Affordable Housing Managed Pipeline regulations, policies, and procedures manual (page 27 Section 2.20) provisions covering relocation do not provide for the new units to be used for a right of return for the displaced tenants. (https://hcidla.lacity.org/revised-2018-affordable-housing-managed-pipeline-regulations.)

This improper attempt to double count affordable unit set asides must be rejected. Instead, the Project proponent must set aside at least 60 units specifically designated for tenants who would return to the building pursuant to the RSO, and then separately from, and additionally to the right of return units, the Project proponent must set aside 143 or 286 units – depending on whether CRA is funding it - to meet its affordable housing obligations under Community Redevelopment Law.

---

[6] With density bonus units meant for Very Low Income tenants being set aside for returning tenants, the Project does not meet the requirements of the Los Angeles Municipal Code for qualifying for density bonus approvals including the floor area averaging incentive that is proposed. (CPC Findings, 1a.) Because the Project seeks to reserve some units for returning tenants, and there is no evidence all returning tenants qualify for Very Low Income units, the Project is not actually setting aside 11% of its units for Very Low Income tenants as it purports to do.

[7] This press report in Curbed LA and other reports cited in this letter are incorporated by reference.

D. The Project May Not Be Deemed Consistent With a Legally Adequate General Plan Because the Adopted Hollywood Community Plan is Outdated and Noncompliant with State Law.

To be legally adequate, the mandatory elements of the general plan must meet the minimum requirements contained in state law. (*Buena Vista Gardens Apartments Ass'n v. City of San Diego* (1985) 175 Cal.App.3d 289, 298; *Twain Harte Homeowners Ass'n v. County of Tuolumne* (1982) 138 Cal.App. 3d 664, 699.) The land use element must include standards of population density based on accurate and reasonably current numbers of people and building intensity. (Govt. Code section 65302 subd. (a) ["The land use element shall include a statement of the standards of population density and building intensity recommended for the various districts and other territory covered by the plan."]) Because the current Hollywood Community Plan contains woefully outdated population projections and densities, it cannot serve as a valid basis for a finding of consistency with the general plan. In *Camp v. Board of Supervisors* (1981) 123 Cal.App.3d 334, 348, the court held it was not possible to approve a development project because appropriate general plan consistency findings could not be made using a general plan that did not meet state requirements for adequacy.

The Hollywood Community Plan has not been updated in a legal way since the 1980s. Although the City attempted to update the HCP several years ago, that HCP amendment was struck down in Court as a violation of Government Code consistency requirements. Excerpts of that Court decision are attached. (Enclosure 2.) The decision is also available at http://www.fixthecity.org/docs/statement_of_decision-12-10-13.pdf and is incorporated by reference. As reported in the press, the Los Angeles Superior Court, the Honorable Judge Goodman presiding, found that the Hollywood Community Plan as proposed by the City at that point was "fundamentally flawed." (https://patch.com/california/hollywood/judge-rues-hollywood-community-plan-fundamentally-flawed.) Until the new HCP, currently under review, is adopted in a legally sufficient manner, the City may not make a consistency finding with the HCP because the HCP is based on outdated information and assumptions about population growth and density. Therefore, the City many not legally approve the Crossroads Project until after an updated HCP is validly adopted. The City should evaluate the Project for consistency with the updated HCP once it is legally adopted.

E. Additional Analysis Supports the Conclusion that Air Quality, Traffic Impacts and Historic Resource Impacts Were Inadequately Analyzed.

We previously objected to the deficiencies in the air quality, traffic, and historic resources analysis in the EIR. Attached are reports from experts providing further details about the deficiencies in these analyses.

Traffic Engineer Robert Kahn of RK Engineering Group expands on the traffic impacts the Project would have that have not been sufficiently analyzed. (Enclosure 3.) Mr. Kahn has identified a number of issues related to the on-site site plan, traffic impact analysis, significantly impacted intersections, mitigation program, impacts from the new stand-alone parking structure, residential street segment impact analysis, and construction impacts as it affects the local area that have to be addressed and additional mitigation measures provided. In addition to Mr. Kahn's analysis, we object that the Community Redevelopment Agency, i.e., the City, has an obligation under the Redevelopment Plan to cease development activities and provide credible traffic and mobility mitigation measures after development in the Regional Center reaches an FAR of 2:1. Development has reached and surpassed this point. We incorporate by reference the Hollywood Heritage letter dated November 23, 2015 sent to Mr. Alejandro Huerta regarding the Notice of Preparation for EIR ENV-2015-2026-EIR.

Deborah Stevens of Environmental Audit Inc. has identified a number of deficiencies in the air quality analysis in the EIR. (Enclosure 4.) The deficiencies include the fact that construction emissions have been underestimated, the LST analysis is incorrect, mitigation measures provided in the EIR are inadequate, the cumulative air quality impact analysis is inadequate, and the health risk analysis is inadequate. The EIR must be revised and recirculated or a subsequent EIR must be prepared and circulated to the public to address the identified problems.

We also incorporate by reference the files for the applications for Historic Cultural Monument designation of four properties that have been identified as historically significant but would be demolished by the Project. (Cultural Heritage Commission Case No. CHC-2018-1035-HCM, CHC-2018-1038-HCM, CHC-2018-1040-HCM; CHC-2018-1042-HCM; Council File number 18-0465, 18-0499, 18-0500, and 18-0501.) These buildings are: (1) the one-story vernacular house known as the "Fritz Cottage" at 1547–49 McCadden Place (1907); (2) the Regency Revival courtyard apartment building complex, known as the "Selma–Las Palmas Courtyard Apartments" at 6700 Selma Avenue and 1535–55 Las Palmas Avenue (1939); (3) the one-story, single-family house, known as the "Major Kunkle Bungalow" at 1542 McCadden Place (1910); and (4) the

two-story Craftsman style duplex, known as the "Talbot-Wood Double Dwelling" at 1606-08 Las Palmas Avenue (1912). (EIR Errata, p. 11.) All of them are proposed to be demolished. These four cultural heritage nominations for buildings at the Crossroads brought by the AIDS Healthcare Foundation and the Art Deco Society and recommended by the Cultural Heritage Commission should have been approved.

The Planning and Land Use Management (PLUM) Committee, chaired by the Honorable Councilmember Jose Huizar at that time, on August 21, 2018 decided to deny the HCM status for these properties but there was no valid reason for that denial. Given that Mr. Huizar has been stripped of his PLUM duties and is under investigation by the FBI (https://www.latimes.com/local/lanow/la-me-ln-huizar-warrant-20190112-story.html), we ask for a reconsideration of these buildings for HCM status. We request that you reevaluate the historic merit of these properties prior to your approval of their demolition, recognize that they should be regarded as Historic Cultural Monuments, and require an alternative Project design that avoids demolition of these properties.[8]

We expressly incorporate by reference the letter submitted by AIDS Healthcare Foundation to Alejandro Huerta on May 14, 2018 submitting comments on EIR ENV-2015-2026-EIR. This letter explained the deficiencies in the Economic Feasibility Evaluation of the Historic Preservation Alternative (Alternative 5) at Appendix 2 of the EIR.

CONCLUSION.

The Project proponent seeks to short change the City and the public by providing fewer units of affordable housing than required by law. The Project must be revised to include 30%, or at the very least 15%, affordable units and to provide all 60 families who currently have rent controlled housing a true right of return at the Project site so they will not be displaced from the area.

We join the objections of other commenters including but not limited to Hollywood Media Center LLC.

---

[8] The Project proponent has not presented its pro formas or other meaningful evidence of the economic infeasibility of an alternative that would preserve the historic properties. Therefore, the Project may not be approved on the basis of a statement of overriding considerations pursuant to Public Resources Code section 21081.

We request notification of any hearings or determinations related to the Project pursuant to the Municipal Code and Public Resources Code section 21092.2.

Thank you for your consideration of these comments.

Sincerely,

Douglas P. Carstens

Enclosures

1. Hollywood Redevelopment Project 5-Year Implementation Plan (2009-2013)
2. Excerpts of Ruling of Los Angeles Superior Court in Fix the City v. City of Los Angeles, Los Angeles Superior Court, Case No. BS 138580.
3. Letter of Robert Kahn of RK Engineering Group
4. Letter of Deborah Stevens of Environmental Audit

ENCLOSURE 1

THE COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES, CA

Hollywood Redevelopment Project

5-YEAR IMPLEMENTATION PLAN
(2009-2013)

REQUIRED BY HEALTH AND SAFETY CODE SECTION 33490

ADOPTED: May 15, 2008

Resolution No. 7162

TABLE OF CONTENTS

I. REDEVELOPMENT PROJECT AREA INFORMATION

A. PROJECT AREA CONTEXT AND BACKGROUND

The 1,107-acre Hollywood Redevelopment Project Area ("Project Area") is located approximately six miles northwest of the Los Angeles Civic Center at the foot of the Hollywood Hills. The Project Area is generally bounded by Franklin Avenue on the north, Serrano Avenue on the east, Santa Monica Boulevard and Fountain Avenue on the south, and La Brea Avenue on the west.

The Redevelopment Plan for the Project Area sets forth an array of goals that include encouraging economic development; promoting and retaining the entertainment industry; revitalizing the historic core; preserving and expanding housing for all income groups; meeting the social needs of area residents; providing urban design guidelines; and preserving historically significant structures. Long-term revitalization activities are guided by the Redevelopment Plan. This Implementation Plan focuses on specific goals and programs for the next five years.

The Community Redevelopment Agency of the City of Los Angeles ("CRA/LA") plans to focus on the following goals during this five-year Implementation Plan period:

- Single Resident Occupancy ("SRO") Housing: CRA/LA will design and implement a program to preserve the number of very low and low-income Single Room Occupancy units in the Project Area. The extent of this program will be contingent on owners' willingness to sell or rehabilitate their SRO properties.
- Supportive Housing: CRA/LA will continue to identify sites and provide financial support to homeless service organizations for the development of permanent affordable housing, social services, and maintenance of developments that will meet and serve the special needs of homeless individuals and families.
- Affordable Housing Opportunities: CRA/LA will continue to assist the development of rental and homeownership housing that is affordable to very low, low and moderate income families and seniors. CRA/LA will support efforts to expand the supply of workforce housing.
- Neighborhood Conservation: CRA/LA will identify at-risk residential neighborhoods and design and implement a program aimed at maintaining affordability and applying design standards, which are consistent with neighborhood character.
- Retail Attraction/Retention: CRA/LA will provide technical and, where feasible, financial assistance to improve the economic viability of existing or new businesses along major corridors. Possible assistance includes using the four-point National Main Street Program approach to stabilizing small businesses, improving signage, and/or commercial façade improvements that support a safe pedestrian environment adjacent to the MTA stations as well as linkages between neighborhoods of the large community.
- Historic Preservation: In conjunction with the Historic Resources Survey update, CRA/LA will develop programs to assist property owners in restoring, rehabilitating, and upgrading significant buildings and structures. Demonstration projects will be supported that showcase innovative solutions to providing security, façade lighting, and re-creation of historic design features. Re-use feasibility studies for commercial and entertainment buildings that will allow adaptive re-use.

- Open Space: CRA/LA will identify sites, negotiate with, and provide financial assistance to City Agencies and Developers to create specific open spaces adjacent to proposed projects giving emphasis to parks, green spaces, plazas, and pocket parks. CRA/LA will work with Los Angeles Unified School District and the Department of Recreation and Parks to identify and implement joint public use opportunities of school playgrounds and athletic facilities.
- Transit Oriented Development ("TOD"): CRA/LA will support and encourage development proximate to Metro Rail stations.
- Mobility: CRA/LA will support and assist programs and projects that improve mobility in Hollywood, including establishment of a parking management district; expanded public parking facilities; a parking availability information system; district valet, taxi zone, circulator; select street and intersection improvements; pedestrian, streetscape, and alley improvements; and alternative transportation modes such as bike share and car share programs. Support establishment of a Transportation Management Organization and an aggressive Transportation Demand Management Program to reduce single occupancy vehicle use.
- Community Outreach and Empowerment: CRA/LA will expand community outreach efforts with the objective of maximizing the number and type of stakeholders involved in decisions affecting CRA/LA activities and actively participate in community events.
- Pedestrian-Friendly Environment: CRA/LA will undertake programs and projects, which improve the pedestrian-friendly character of major Hollywood thoroughfares. Working with stakeholder organizations. CRA/LA will initiate projects directed toward improvement of public right-of-way in the Hollywood commercial district.
- Core Industries: CRA/LA will support the retention and expansions of core industries in Hollywood with emphasis on the entertainment, tourist and entertainment-related education industries.
- Plans: CRA/LA will complete and implement the following Plans:
  The Hollywood Boulevard District/Franklin Corridor Urban Design Plan, the Sunset Boulevard/Civic Center Urban Design Plan, the Hollywood Mobility Strategy Plan, and the Hollywood Historic Survey Update and Neighborhood Conservation Plan, the Santa Monica Boulevard Neighborhood Strategy Plan and the Western Transit Corridor Plan.

The Redevelopment Plan was adopted by the City Council of the City of Los Angeles on May 7, 1986. The Redevelopment Plan has been amended three times:

- On December 20, 1994 extend Redevelopment Plan effectiveness to 40 years
- On May 20, 2003 extend time limit to commence eminent domain
- On October 31, 2003 eliminate time limit to incur debt pursuant to SB211 and extend plan effectiveness and receipt of tax increment revenue by one year pursuant to SB1096.

The following table contains significant dates associated with the Redevelopment Plan.

Effectiveness of Redevelopment Plan	Expires May 7, 2027
Time Limit to Commence Eminent Domain	May 20, 2015
Time Limit to Incur Debt	May 7, 2027
Time Limit to Repay Debt	May 7, 2037

B. IDENTIFICATION OF CONDITIONS AT THE TIME OF ADOPTION OF THE REDEVELPMENT PLAN

At the time of adoption, the Project Area contained the following blighting conditions:

- Economic stagnation was characterized by a shortage of available industrial space for entertainment related uses and a decline in residential investment, shifting commercial uses, and a shortage of first-class office space.
- Increasing density, including a low-income population that was growing at rates faster than the citywide average; in addition, conditions of high rates of unemployment, overcrowding, and substandard housing were present.
- Over-burdened circulation systems, inadequate public improvements, and insufficient open space existed in the area. According to the Hollywood Circulation Study, the following streets were identified as requiring improvements: Sunset and Santa Monica Boulevards; La Brea, Franklin, and Highland Avenues; and Vine Street. A 1981 Parking and Traffic Study identified a shortage of approximately 4,523 parking spaces.
- Old, obsolete, and substandard structures were blight in the area, including approximately 50 residential units classified as substantially deteriorated and approximately 2,450 units classified as overcrowded. The CRA/LA in 1984 estimated 380,000 square feet of commercial office space was in need of moderate to heavy rehabilitation, while 1.5 million square feet of retail space was in need of moderate or heavy rehabilitation.
- Irregular parcels that did not meet established planning and zoning standards or economic requirements for development were found throughout the area.
- Fragmented land ownership existed.
- Public classroom space and day care facilities were in short supply.
- Homelessness, especially among youth, was climbing.
- Levels of crime were among the highest in the city.

C. GOALS AND OBJECTIVES FOR THE REDEVELOPMENT PROJECT AREA

The Redevelopment Plan establishes a variety of goals for the Project Area; these goals frame the near-term objectives for the Implementation Plan period. The Redevelopment Plan goals are listed below.

1. Encourage the involvement and participation of residents, businesspersons, property owners, and community organization in the redevelopment of the community.

2. Preserve and increase employment and business and investment opportunities through redevelopment programs and, to the greatest extent feasible, promote these opportunities for minorities and women.

3. Promote a balanced community, addressing the needs of the residential, commercial, industrial, arts, and entertainment sectors.

4. Support and encourage the development of social services with special consideration given to participating in projects involving community-based organizations that serve runaways, the homeless, senior citizens, and provide child care services and other social services.

5. Improve the quality of the environment, promote a positive image for Hollywood, and provide a safe environment through mechanisms such as:

a. adopting land use standards;

b. promoting architectural and urban design standards including: standards for height, building setbacks, continuity of street façade, building materials, and compatibility of new construction with existing structures and concealment of mechanical appurtenances;

c. promoting landscape criteria and planting programs to ensure additional green space;

d. encouraging maintenance of the built environment;

e. promoting sign and billboard standards;

f. coordinating the provision of high quality public improvements;

g. promoting rehabilitation and restoration guidelines; and

h. integrating public safety concerns into planning efforts.

6. Support and promote Hollywood as the center of the entertainment industry and a tourist destination through the retention, development, and expansion of all sectors of the entertainment industry.

7. Promote the development of Hollywood Boulevard within the Hollywood commercial core as a unique place that:

a. reflects Hollywood's position as the entertainment center;

b. provides facilities for tourists;

c. contains active retail and entertainment uses at the street level;

d. provides for residential uses;

e. is pedestrian oriented;

f. is a focus for the arts, particularly the performing arts; and

g. recognizes and reinforces its history and architecture.

8. Promote and encourage the retention and expansion of all segments of the arts community and support facilities necessary to foster the arts. Support arts organizations through land use and development policies such as the creation of a theater district.

9. Provide housing choices and increase the supply and improve the quality of housing for all income and age groups, especially for persons with low and moderate incomes; and provide home ownership opportunities and other housing choices that meet the needs of the resident population.

10. Promote the development of sound residential neighborhoods through mechanisms such as land use, density and design standards, public improvements, property rehabilitation, sensitive in-fill housing, traffic and circulation programming, development of open spaces, and other support services necessary to enable residents to live and work in Hollywood.

11. Recognize, promote, and support the retention, restoration, and appropriate reuse of existing buildings, groupings of buildings, and other physical features, especially those having significant historic and/or architectural value and ensure that new development is sensitive to these features through land use and development criteria.

12. Support and encourage a circulation system that will improve the quality of life in Hollywood, including pedestrian, automobile, parking, and mass transit systems with an emphasis on serving existing facilities and meeting future needs.

13. Promote and encourage the development of health, education, child and youth care, and senior citizen facilities and programs to enable the development of a community with a variety of lifestyles.

14. Promote and encourage development of recreational and cultural facilities and open spaces necessary to support attractive residential neighborhoods and commercial centers.

15. Promote the development of the varied ethnic communities in Hollywood.

16. To the maximum extent feasible, seek to build replacement housing within the Project Area prior to the destruction or removal of dwelling units that house low and moderate-income persons. The CRA/LA shall make a good faith effort to relocate displacees within the Project Area unless they choose to relocate elsewhere. Project Area displacees shall be provided a priority for occupancy in housing that the CRA/LA has facilitated.

II. PROJECT AREA ACCOMPLISHMENTS

During the previous Implementation Plan period, the CRA/LA continued its work in revitalizing and preserving the historic core; providing urban design guidelines; encouraging core industry-serving projects; increasing public open spaces; and adding recreational and cultural facilities. The CRA/LA will also continue to focus on increasing housing density, the supply of affordable housing near transit, and mixed-use transit oriented development.

The CRA/LA is continuing the Core Industries Initiative, which consists of programs and activities aimed at attracting and retaining the Project Area's four core industries: entertainment, tourism, health services, and education.

The CRA/LA continues to provide staff to the Hollywood Arts Design Advisory Panel that oversees expenditures from the Hollywood Cultural Trust Fund. This Fund is comprised of developer contributions and provides funding for artists, cultural facilities, and organizations within the Project Area. In addition, the CRA/LA funded technical assistance for Hollywood's Art Program and artwork for the Lexington Pocket Park II.

The CRA/LA continues to implement the recommendations of the Hollywood Social Needs Plan adopted in 1991. Technical and funding assistance is provided for eligible projects that provide services for youths, homeless individual(s) seniors, the working poor, or disabled who make Hollywood their home. During the previous Implementation Plan period, the CRA/LA provided financial assistance for the construction of the Farmer's Kitchen Project in the amount of $400,000 that will provide community nutrition classes and job training. CRA/LA also provided financial assistance for the rehabilitation of the Los Angeles Gay and Lesbian Center in the amount of $2,100,000. In addition, the CRA/LA provided financial assistance in the amount of $968,000 to Travelers Aid Society of Los Angeles for the continuation of providing social services to homeless, runaway youth, adults, and families. Financial assistance in the amount of $155,000 was also provided by CRA/LA to hire an architectural firm for the design and preparation of construction documents on the rehabilitation of the Social Service Center at Blessed Sacrament. This center provides social services to homeless adults, families and children. Since the homeless population has increase in the Hollywood area, the CRA/LA working with the Hollywood Chamber of Commerce, businesses, and stakeholders have also provided financial assistance to People Assisting the Homeless for their Hollywood Emergency Response Outreach Program (HERO) in the amount of $250,000. The HERO program complements existing daytime street outreach social services by expanding their outreach hours to include evenings and weekends, Monday through Friday from 4:00PM to 12 midnight.

The CRA/LA continues to fund streetscape improvements, graffiti abatement efforts, housing assistance to low and moderate income residents, and community safety via the security foot patrol on Hollywood Boulevard and on Sunset Boulevard.

Specific projects completed during the previous Implementation Plan period are described below.

Affordable Housing Projects

Hollywood Metro Apartments
This project is located directly above the Hollywood/Western Metro Red Line Station was completed in FY2004 and consists of 60 affordable rental apartments. Most (45 units) are affordable to and occupied by very low-income households, with the remaining (15 units) affordable to low income households. This project also has a day care center, which accommodates up to 70 children, a Charter School and 2 Flex cars available for the community. CRA/LA negotiated and executed a Disposition and Development Agreement with McCormack Baron Salazar in the amount of $3,726,000 to develop the project. Total development cost $14,122,000.

Views at 270
This project, at the northeast corner of Sunset and Western, is a mixed-use commercial and residential development consisting of a 13,000 square foot Walgreens drug store at ground level, 56 units of affordable family housing (28 low income units, 27 very low income units and 1 Manager's unit), and 96 parking spaces. Construction was completed in FY2005. CRA/LA executed a Loan Agreement with the Hollywood Community Housing Corporation (HCHC) in the amount of $7,700,000. Total development cost $25,100,000.

Palomar Apartments
The project, located at 5473 Santa Monica Boulevard, is a conversion of 48 studio units into 24 efficiency units for very low income and formerly homeless persons disabled by

HIV/AIDS. The Palomar hotel building was severely damaged by fire in August 2001 and later acquired by the Hollywood Community Housing Corporation, with funding assistance from the CRA/LA. Restoration and adaptive reuse was completed in FY2006 and the building is currently occupied by very low-income tenants. CRA/LA assistance for predevelopment and acquisition activities was in the amount of $1,900,000. Total development cost $5,100,000.

Triangle Square (formerly known as Encore Hall)
This project at the northeast corner of Selma Avenue and Ivar Street consists of 104 housing units for low-income (96-1 bedrooms and 8-2 bedrooms), HIV/AIDS and special needs gay and lesbian elders. Common areas include a kitchen, gym and nutrition center. This project also includes a multipurpose community room. Project was completed and celebrated its grand opening in FY2007. CRA/LA executed a Disposition and Development Agreement with McCormack Baron Salazar to provide assistance in the amount of $7,000,000. Total development cost $20,798,000.

Other Projects

Cinerama Public Parking
Construction of this 1,725-space CRA/LA-owned parking structure on the north side of De Longpre Avenue between Ivar Avenue and Vine Street was completed in March 2002. CRA/LA hired a parking operator and will continue to monitor the operations of the parking structure as a CRA/LA asset in accordance with bond requirements to serve the Sunset and Vine District. The CRA/LA developed the parking structure at a total cost of $32,200,000.

Valet and Circulator
This consists of a nighttime circulator bus to serve numerous entertainment clubs on Hollywood Boulevard, Gower Street, Sunset Boulevard, and La Brea Avenue. In FY2006, trolley service (the "Holly Trolley") was established. In FY2007, trolley service expanded to provide transportation between various parking venues, with stops at the Hollywood/Vine and Hollywood/Highland Metro stations. Trolley services were discontinued in Mid 2007 due to limited rider ship.

Sunset and Vine (formerly known as Hollywood Marketplace)
The project consists of development of a block bounded by Sunset Boulevard, Vine Street, Selma Avenue, and Morningside Court. The multi-level, mixed-use development includes approximately 100,000 square feet of retail and restaurant space, a 700-space parking structure, and 300 market-rate residential units. In FY2005, the project was completed and fully occupied. The estimated construction cost was $120,000,000 and the CRA/LA's contribution was site-specific tax increment revenues in the amount of $3,300,000

Hillview Apartments
This project, located at 6531-6533 Hollywood Boulevard, consists of restoration of the historic Hillview Apartment building into approximately 8,500 square feet of ground floor retail space and 54 market-rate housing units. The building suffered structural damage as a result of the 1994 Northridge Earthquake and arson fire damage in 2002, and had been vacant for several years. Restoration is now complete 2005 and the CRA/LA's contribution to this project is the commitment of site-specific tax increment revenues for 30 years to pay off a portion of the debt service on the loan for the project.

III. ACTIVITY REPORT ON THE NEXT 5-YEAR PERIOD

Over the next five years, the CRA/LA plans to implement the following projects and programs. The list below describes them and the blighting-related conditions that will be eliminated, the Redevelopment Plan goals that will be achieved, and estimated costs.[1]

A. Affordable Housing	**Estimated Expenditure**
1. Villas at Gower This project at the northeast corner of Gower Street involves the development of 70 very low-income housing units (12 studios, 24-1 bedrooms, and 34-2 bedrooms) with supportive services for homeless families, transitional youths, and special needs individuals. The CRA/LA is in the negotiation and planning phase, with a goal of producing schematic design drawings in FY2008. Blighting conditions addressed by this project include provision of affordable housing and supportive services for homeless families and individuals. Redevelopment Plan goals that would be achieved include, (4), (9), and (13). Jobs generated: Approximately 20 permanent jobs and 100 construction jobs. *Timeframe ..... FY2005 – FY2011*	$7,000,000

[1] Costs are subject to change, and completion of these projects may require future action by the CRA/LA.

2. Hollywood and Vine This project, located at the southeast corner of Hollywood Boulevard and Vine Street, is a major public-private, catalytic, transit-oriented mixed-use development adjacent to the Hollywood/Vine Metro portal. The project includes redevelopment of a former Metro surface parking lot and features 150 condominiums and 375 rental housing units, 74 of which will be affordable to low income households. Construction is anticipated to be completed in FY2009-2010. Blighting conditions addressed by this project include provision of affordable housing. Redevelopment Plan goals that would be achieved include (3), (7), and (9). Jobs generated: Approximately 600 permanent jobs and 1,500 construction jobs. *Timeframe ..... FY2001 – FY2010*	Included with Mixed Use $6,500,000
3. Bungalow Courts This project involves the preservation and rehabilitation of 4 historic bungalow courts (32 units) in the Hollywood Project and (10 units) in the East Hollywood Project Area. Blighting conditions addressed by this project include provision of affordable housing and rehabilitation of old, obsolete, and substandard structures. Redevelopment Plan goals that would be achieved include (3), (9), (11), and (16). Jobs generated: Approximately 2 permanent jobs and 120 construction jobs. *Timeframe FY2009--2010*	$7,500,000
4. 1800 Argyle This project involves development of 87 market rate housing units. Blighting conditions addressed by this project include demolition of a vacant obsolete office building and development of market rate residential units. Redevelopment Plan goals that would be achieved include (3), and (9). Jobs generated: To be determined. *Timeframe FY2008-2014*	CRA/LA received development contribution of $1,750,000 for deposit into Housing Trust Fund. $500,000 development contribution to Public Open Space

5. Single Occupancy Residence Program This project involves preservation and creation of 220 single occupancy residential units for very low income residents. Blighting conditions addressed by this project include development of affordable housing units. Redevelopment Plan goals that would be achieved include (3) and (9). Jobs generated: To be determined. *Timeframe FY2010-2013*	$14,000,000
6. Homeownership Initiative This project involves the conversion of existing rental properties to limited equity cooperatives or condominiums in order to retain affordable housing and promote ownership. This program was not implemented due to Non-responsive from developers. Funds were used to subsidize other affordable housing developments project wide. Redevelopment Plan goals that would be achieved include (3), (9), and (11). Jobs generated: To be determined *Timeframe ..... Ongoing*	$3,487,000
7. Response to Housing Opportunities This project involves the provision of funds for new housing objectives. Redevelopment Plan goals that would be achieved include (3) and (9). Jobs generated: N/A *Timeframe ..... Ongoing*	$11,351,000

B. Commercial and Industrial	Estimated Expenditure
1. Academy of Motion Picture Arts and Sciences (AMPAS) Museum This project, located on the two blocks bounded by Vine Street, Fountain Avenue, Cahuenga Boulevard, and De Longpre Avenue, is a 150,000 to 200,000 square foot museum of motion pictures in the heart of Hollywood that will be a regional, national, and worldwide tourist destination. The museum will feature 60,000 to 80,000 square feet of exhibit space; public programs; retrospectives and lectures; hands-on exhibits; and a theater/amphitheater. The museum will be a permeable campus with public open spaces, and will offer discounted ticketing for neighborhood residents. The EIR is in process. Blighting conditions addressed include a shortage of space for entertainment related uses and insufficient open spaces. Redevelopment Plan goals that would be achieved include (3), (6), and (14). Jobs generated: Approximately 160 permanent jobs and 2,000 to 2,500 construction jobs. *Timeframe ..... FY2005 – FY2012*	Under Negotiation
2. Historic Building Prototype This project involves the restoration or re-creation of historic building elements that were not part of developers' rehabilitation plans. Elements include façade lighting, entry canopy, and historically sensitive storefront security systems. Properties to be restored are located at 6162, 6650, and 7046 Hollywood Boulevard. Plans have been completed and agreements are being executed. Construction will commence in FY2009 and CRA/LA to monitor conformance to the plans and CRA/LA policies. Blighting conditions addressed by this project include rehabilitation of old, obsolete, and substandard structures Redevelopment Plan goals that would be achieved include (3), (5), (7), and (11). Jobs generated: To be determined *Timeframe ..... FY2007 – FY2009*	$733,000 (all MTA Funds under Hollywood Construction Impact Program)

3. Vine Street Tower This project is a public-private partnership to create a brand-new, Class-A commercial office building at Vine Street at Selma Avenue. The project features redevelopment of a CRA/LA owned surface parking lot into a new commercial office building, over 100,000 square feet of office space targeted at the entertainment industry, and LEED certified silver construction. Exclusive negotiations are ongoing through the end of FY2008. In FY2009, the draft EIR will be circulated and terms of the DDA will be finalized. Blighting conditions addressed by this project include economic stagnation due to a shortage of first-class office space and space for entertainment uses. Redevelopment Plan goals that would be achieved include (2), (3), (6), and (8). Jobs generated: Approximately 300 permanent jobs and 800 construction jobs. *Timeframe FY2006-FY2011*	Under Negotiation

C. Community Facilities and Programs	Estimated Expenditure
1. Metrobike This project involves the development of a bicycle "drop in" center at the Hollywood/Western Metro station at 5454 Hollywood Boulevard that will allow bike riders using transit to drop off their bikes during the day. The facility will also serve as a staging site for bike tours in Griffith Park and surrounding urban areas. Construction plans have been completed and approved, and CRA/LA will be working with the City of Los Angeles Department of General Services on Bids, award the construction contract, and monitoring. Blighting conditions addressed by this project include over-burdened circulation systems and inadequate community facilities. Redevelopment Plan goals that would be achieved include (12) and (14). Jobs generated: To be determined *Timeframe ..... FY2007 – FY2010*	$500,000
2. Orchard Gables This project involves the rehabilitation and adaptive re-use of the Orchard Gables Cottage, constructed in 1912, for potential use as a music conservatory by the Harmony Group, which provides music education for low income children, and administrative offices for LACER, which provides arts education in public schools. Orchard Gables is located at 1277 Wilcox Avenue (southwest corner of Wilcox and Fountain Avenue). Property will be conveyed and redeveloped by the Hollywood Community Housing Corporation. Blighting conditions addressed by this project include rehabilitation of old, obsolete, and substandard structures. Redevelopment Plan goals that would be achieved include (3), (4), (11), (13), and (14). Jobs generated: To be determined *Timeframe ..... FY2007 – FY2012*	$2,500,000

D. Mixed Use	Estimated Expenditure
1. Highland Center This project, located on the two-block area bounded by Highland, McCadden, Las Palmas, and Selma, consists of development of up to 1.1 million square feet of development consisting of: 309 residential units; 350 hotel rooms; 350,000 square feet of office space; and 50,000 square feet of retail floor area. Negotiations and preparation of the EIR are underway. Blighting conditions addressed by this project include economic stagnation due to a shortage of first-class office space and shifting commercial uses. Redevelopment Plan goals that would be achieved include (2), (3), (9), and (11). Jobs generated: To be determined *Timeframe FY2008-2011*	To Be Determined
2. Hollywood and Vine This project, located at the southeast corner of Hollywood Boulevard and Vine Street, is a major public-private, catalytic, transit-oriented mixed-use development adjacent to the Hollywood/Vine Metro portal. The project includes redevelopment of a former Metro surface parking lot and features a 4-star 300-room W Hotel; 60,000 square feet of retail and restaurant space; and 150 condominiums and 375 rental housing units, 74 of which will be available to low income households. Construction is anticipated to be completed in FY2009-2010. Blighting conditions addressed by this project include economic stagnation due to shifting commercial uses and provision of affordable housing. Redevelopment Plan goals that would be achieved include (2), (3), (7), and (9). Jobs generated: Approximately 600 permanent jobs and 1,500 construction jobs. *Timeframe ..... FY2001 – FY2010*	$6,500,000

3. Sunset Gordon This project, located on Sunset Boulevard at Gordon Street, is a high-rise mixed-use development of a surface parking lot and the former Spaghetti Factory restaurant into a project that features: 240 condominiums and up to 60 units workforce; 40,000 square feet of commercial creative office space; 13,000 square feet of neighborhood-serving retail; one-half acre public park; historic rehabilitation; and LEED gold construction. The project is in the entitlement process. Blighting conditions addressed by this project include economic stagnation due to a shortage of first-class office space and shifting commercial uses, along with old, obsolete, and substandard structures. Redevelopment Plan goals that would be achieved include (2), (3), (9), and (11). Jobs generated: Approximately 100 permanent jobs and 700 construction jobs. *Timeframe ..... FY2007 – FY2010*	$3,359,800 FY08 $6,200,000 FY09

E. Public Improvements	**Estimated Expenditure**
1. Historic Resource Survey Update In conjunction with surveys for Westlake and Wilshire Center/Koreatown, prepare a comprehensive update of historic resource surveys conducted in 1985 and 2003, and integrate Section 106 Historic Assessment Findings conducted in 1994 after the Northridge earthquake. Digitize historic survey forms and create database allowing for mapping and retrieval of information. This project has been approved by the City Council and is underway. Blighting conditions addressed by this project include rehabilitation of old, obsolete, and substandard structures. Redevelopment Plan goals that would be achieved include (3) and (11). Jobs generated: N/A *Timeframe ..... FY2008 – FY2009*	$147,000 Study Dollar amount on Implementation Plan – To Be Determine

2. Hollywood Boulevard / Franklin Corridor Plan This Plan area is generically bounded by Selma to Franklin and La Brea to Gower. Work for the Plan includes updating design guidelines and development standards for the Hollywood Boulevard District, and preparing architectural guidelines for the Franklin Corridor neighborhood north of Hollywood Boulevard. Blighting conditions addressed by this project include inadequate public improvements. Redevelopment Plan goals that would be achieved include (1), (5), (7), and (10). Jobs generated: N/A *Timeframe FT2008-FY2014*	$106,000 Study Dollar Amount on Implementation Plan - To Be Determined
3. Hollywood Central Park This project, located on the US101 Hollywood Freeway between Bronson Avenue and Santa Monica Boulevard, consists of the creation and development of new public open green space. The project could create 44 acres of new active and passive park space; a greenway linking parts of Hollywood; and significant park space in an area underserved with green space. The project is undergoing feasibility analysis. Blighting conditions addressed by this project include inadequate public improvements and insufficient open space. Redevelopment Plan goals that would be achieved include (3) and (14). Jobs generated: To be determined *Timeframe ..... FY2008 –FY2010*	$120,000 for Feasibility Study

4. Hollywood Mobility Strategy Plan Plan area is the Hollywood urban core, bounded by La Brea, Franklin, and Gower. The Plan will include recommended transportation, circulation, and pedestrian improvements, including a mitigation toolbox, to improve mobility in Hollywood; evaluate the feasibility of establishing a parking management district in order to help balance supply and demand for parking among sub-areas in the urban core; and provide recommendations on implementing a circulator connecting activity areas, parking resources, and key destinations in Hollywood. Blighting conditions addressed by this project include over-burdened circulation systems and inadequate public improvements. Redevelopment Plan goals that would be achieved include (1) and (12). Jobs generated: N/A *Timeframe FY2008-2014*	$300,000 Study Dollar Amount on Implementation Plan - To Be Determined
5. Hollywood Pedestrian/Transit Crossroads This project, near the Metro Rail Red Line stations at Highland/Vine and Hollywood/Western, will improve the pedestrian environment with new streetscape elements and provide amenities for transit riders. The designs are being finalized and awaiting Caltrans approval to proceed. Blighting conditions addressed include over-burdened circulation systems and inadequate public improvements. Redevelopment Plan goals that would be achieved include (3) and (12). Jobs generated: Approximately 75 construction jobs. *Timeframe FY2009-FY2012*	Phase I - $1,600,000 Phase II - $241,000

6. Santa Monica Boulevard at Western Pedestrian Public Improvements) This project, located at the intersection of Santa Monica Boulevard and Western Avenue, consists of a public improvement project at one of the busiest, most dangerous, and heavily traveled intersections in Los Angeles. The project aims to create a more pedestrian-friendly intersection, employ new technology including smart crosswalks, and create a safer intersection more efficient for bus travel. The project is in the design stage. Blighting conditions addressed include over-burdened circulation systems and inadequate public improvements. Redevelopment Plan goals that would be achieved include (3) and (12). Jobs generated: Approximately 25 construction jobs. *Timeframe FY2006-2010*	$104,000 Design Phase
7. Sunset Boulevard / Civic Center Plan This Plan area is generically bounded by Sunset Boulevard between La Brea and the 101 Freeway, and Civic Center bounded by DeLongpre, Vine, Fountain, and Wilcox. The Plan will include design guidelines and development standards for Sunset Boulevard and the Civic Center, with particular attention paid to transitions in scale of development adjacent to residential neighborhoods, streetscape improvements, and showcasing the Civic Center area of Hollywood. Blighting conditions addressed include inadequate public improvements. Redevelopment Plan goals that would be achieved include (3) and (5). Jobs generated: N/A *Timeframe FY2008-FY2014*	$431,000 Study Dollar Amount on Implementation Plan - To Be Determined

F. Development Opportunities	Estimated Expenditure
1. Yucca and Argyle Block This project opportunity is located on the northern half of the block bounded by Hollywood Boulevard, Vine Street, Yucca Street, and Argyle Avenue. The CRA/LA will identify development opportunities on the properties adjacent to Capital Records and the Pantages Theater and find opportunities consistent with the Redevelopment Plan, such as creative office space, commercial office space, retail and restaurant, residential, open spaces, and parking. Blighting conditions addressed include economic stagnation due to a shortage of first-class office space and shifting commercial uses, along with old, obsolete, and substandard structures and insufficient open space. Redevelopment Plan goals that would be achieved include (2), (3), (7), (9), (11), and (14). Jobs generated: To be determined *Timeframe* *FY2008-2010*	To Be Determined

IV. AFFORDABLE HOUSING PROGRAM

A. IMPLEMENTATION PLAN REQUIREMENTS

This section of the Implementation Plan presents those components of the CRA/LA's intended program for the Project Area that deal with the expenditure of funds and activities relating to the production of housing affordable to persons and families of low and moderate income. Low and moderate income is defined in the California Redevelopment Law ("CRL") and is set annually by the California Housing and Community Development Department ("HCD"). The income levels are published annually by HCD and are defined as follows:

Income Category	% of Median Income Range for Applicable Household Size	Section[2]
Moderate	80% to 120%	50093
Low	50% to 80%	50079.5
Very-Low	Less than 50%	50105

The CRL provides that, in addition to the removal of blight, a fundamental purpose of redevelopment is to expand the supply of low and moderate income housing (Section 33071). To accomplish this purpose, the CRL contains numerous provisions to guide redevelopment agency activities with regard to low and moderate-income housing. This section of the Implementation Plan addresses how the CRA/LA's plans for the Project Area will achieve many of the housing responsibilities contained in the CRL. Section 33490 of the CRL requires that the housing component of the Implementation Plan address the applicable items presented in the list below.

1. Production of Housing Based on Activities in the Project Area

   a. At least 30% of all new and substantially rehabilitated dwelling units developed by an agency shall be available at affordable housing cost to persons and families of low and moderate income and shall be occupied by these persons and families (Section 33413(b)(1));

   b. At least 15% of all new dwelling units developed within a project area under the jurisdiction of an agency by public or private entities or persons other than the agency shall be available at affordable housing cost to persons and families of low or moderate income, of which not less than 60% shall be affordable to Very Low Income households and shall be occupied by these persons or families (Section 33413(b)(2);

   c. At least 15% of all substantially rehabilitated units that have received agency assistance shall be available at affordable housing cost to persons and families of low or moderate income, of which not less than 60% shall be affordable to Very Low Income households, and shall be occupied by these persons or families (Section 33413(b)(2)(iii)); (Prior to January 1, 2002, substantially rehabilitated multi-family

[2]All referenced sections are found in the California Health and Safety Code, unless otherwise indicated.

rental dwelling units with three or more units regardless of whether there was agency assistance, or agency-assisted substantially rehabilitated single-family dwelling units with one or two units); and

d. Suitable locations must be identified for replacement housing units constructed or substantially rehabilitated pursuant to Section 33413(a), if the destruction or removal of low and moderate-income housing units will result from a project contained in the Implementation Plan (Section 33490(a)(3)).

2. Set-Aside and Expenditure of Tax Increment for Housing Purposes

a. The "Set-Aside" of a minimum of 20% of tax increment in projects adopted on or after January 1, 1977 (Section 33334.2); and

b. The proportional expenditure of housing funds on low and very low income housing (Section 33334.4).

3. Section 33490 also requires:

a. Estimates of the balances and deposits into the Housing Fund created to hold the set-aside of tax increment;

b. A housing program identifying anticipated expenditures from the Housing Fund;

c. An indication of housing activity that has occurred in the Project Area; and

d. Estimates of housing units that will be produced for each of the various income categories.

All of the information required by Section 33490 is provided in the following sections of this Implementation Plan.[3]

[3] It should be noted that Section 33333.10 does not apply, as the Project Area has not been amended under the provisions of SB 211, which allows a 10-year extension of effectiveness upon making findings of significant remaining blight in the Project Area.

B. HISTORICAL AFFORDABLE HOUSING ACTIVITIES

The Redevelopment Plan was adopted on May 7, 1986. Between 1986 and FY2008, projects were completed that produced 1,297 affordable housing units within the Project Area. During the previous Implementation Plan period (FY2004 through FY2008), the CRA/LA completed the following affordable housing activities within the Project Area:

Project Name	Year Built	Project Type	Total Number of Units	Number of Affordable Units	Very Low Income Units	Covenant Period
Hollywood Metro Apts.	FY2004	Rental	60	60	45	55 years
Views @ 270	FY2005	Rental	56	56	27	55 years
Palomar Apartments	FY2006	Rental	24	24	24	55 years
Triangle Square	FY2007	Sr. Rental	104	104	0	55 years
Bronson Court**	FY2008	Rental	31	31 units @ 50% = 15.5	8 units @ 50% = 4	55 years
Totals			**275**	**259.5**	**100**	

**Project was partially developed with funding from the East Hollywood/Beverly Normandie Earthquake Disaster Assistance Project, so unit production in the Hollywood Project Area is multiplied by 50%. Of the 259.5 units created, 155.5 are affordable to and occupied by very low-income households. The remaining 104 are affordable to and occupied by low-income senior households.

C. HOUSING GOALS AND OBJECTIVES OF IMPLEMENTATION PLAN

The primary goal of the CRA/LA is to comply in a responsible manner with the affordable housing requirements imposed by the CRL. The CRL requires that certain housing goals be achieved over various time periods. The inclusionary housing production requirement of Section 33413 and the proportionality requirement of Section 3333.4 both are required to be met by December 31, 2014, and every ten years, thereafter throughout the life of the Redevelopment Plan. It is the CRA/LA's goal and objective for this Implementation Plan to accomplish sufficient activity and expenditures to comply with the applicable requirements. The following section discusses housing activities planned for the Five-Year Implementation Plan period.

1. Housing Fund Resources

The following presents the estimated Housing Fund cash flow for the first five years of this Implementation Plan. The estimated deposits are based on a tax increment projection along with other sources of revenues identified by CRA/LA staff. The Set-Aside revenue includes the following:

- Twenty percent (20%) of the estimated gross tax increment for the Project Area;
- Interest earned;

- Sale of land owned by the CRA/LA;
- Residual receipt revenue to the CRA/LA;
- Loan repayments to the CRA/LA;
- Future bond proceeds; and
- Cash reserves from previous fiscal years.

The total projected revenues that will be deposited into the Housing Fund during the Implementation Plan period is as follows:

HOUSING FUNDS	Implementation Plan Period
Beginning Balance	$5,369,000
Property Tax Increment	$31,363,000
Interest	$728,000
Bond Proceeds	$12,533,780
Total Projected Revenues	**$49,993.780**

2. The Housing Program and Housing Fund Expenditures

The expenditures can be broken into four categories as described below. The total projected expenditures of Housing Fund revenues during the Implementation Plan period is as follows:

	Implementation Plan Period
Projects	$28,500,000
Programs	$14,838,000
Administration	$130,780
Debt Service	$6,525,000
Total Expenditures	**$49,993,780**

a. Projects

The CRA/LA over the next five years will continue to implement projects that will provide affordable housing opportunities within the Project Area. The following summarizes how the CRA/LA will assist projects during the next five years:

Project Name	Description	Affordability Mix	Estimated Completion	Estimated Housing Fund Expenditures
Bungalow Courts	Preservation and rehabilitation of historic residential bungalow courts in Hollywood.	32 units consist of 1 studio – vacant, 27-1 bedrooms very low @50% and 4-2 bedrooms low @80%	FY2010	$7,500,000 FY08
Villas at Gower Supportive Housing	Permanent housing and supportive services targeting formerly homeless families, transitional youths, and special needs individuals.	70 units of extremely low income housing 12 studios, 24-1 bedrooms and 34-2 bedrooms	FY2011	$7,000,000 FY07
Bricker Historic Building Senior Housing	Rehabilitation of 16 affordable units for low and very low senior.	1 unit at 50% very low and 7 units 50% low/moderate income units	FY2010	$0 Project funded from East Hollywood Project area.
Hollywood/Vine	Mixed Use development consisting of condominiums and rental.	74 units at 20% for low income households	FY2010	$0 Financial assistance only for acquisition and relocation on commercial properties.
Single Room Occupancy	Program designed to increase and preserve the number of single room occupancy units available to very low income households.	220 very low income units	FY2013	$14,000,000

b. Programs

The following summarizes the programs the CRA/LA plans to implement:

Program Name	Description	Target Affordability	Estimated Housing Fund Expenditures
Homeownership Initiative	Conversion of existing rental properties to limited equity cooperatives or condominiums	Low income residents who currently rent but would like to own	$3,487,000
Response to Housing Opportunities	Funds for new housing objectives or incurred costs prior to Board approval of specific projects	50% very low and 50% low income	$11,351,000

c. Administration

Administration includes costs for professional services and other administrative costs incurred in the course of operating the housing activities of the Project Area. This category is used for general administration costs not associated with any specific project or program, such as annual audits and legal services. Project-specific administrative costs are included within the budget of each project or program. Amounts allocated to this category in the expenditure plan are based on actual amounts provided by CRA/LA staff.

d. Bond Debt Service

The CRA/LA will continue to make principal and interest payments on past and future tax allocation bonds. The annual debt service is secured by Housing Fund revenues generated from tax increment.

3. Summary of Planned Housing Activity

The CRA/LA has a number of affordable housing projects and programs that it plans to implement during the Implementation Plan period.

1. Bungalow Courts consists of preservation and rehabilitation of 32 units of 3 historic residential properties in Hollywood. In FY2008, the CRA/LA provided financial assistance for the rehabilitation of 3 historic bungalows at 1516, 1544 and 1554 North Serrano Avenue. Rehabilitated properties will be available to very low, low, and moderate income households.
2. The Bricker Building is a rehabilitationn project that consists of 16 units affordable to low and very low-income seniors.
3. Hollywood and Vine is a major mixed-use transit-oriented development featuring a 4-star W Hotel, retail and restaurants, market-rate housing, and affordable housing. There will be a total of 74 units affordable to low income households.

4. Villas at Gower Supportive Housing is a development of 70 units, permanent housing and supportive services for formerly homeless families, transitional youths, and special needs individuals. The CRA/LA has acquired property and is in negotiations with the developer on the Disposition Development Agreement. Near-term plans include producing schematic design drawings and continuing to work with the Gower Advisory Committee.
5. CRA/LA will design and implement a program to preserve the number of very low income Single Room Occupancy units in the Project Area. The extent of this program will be contingent on owners' willingness to sell or rehabilitate their SRO properties.

The table below is the proposed housing projects for the Project Area, with estimates of numbers of units and proposed expenditures over each of the next five years, by unit type.

PROJECTS BY YEAR	FY2009	FY2010	FY2011	FY2012	FY2013
New Units #	74	70	0	0	0
Proposed Expenditure	$0	$7,000,000	$0	$0	$0
Rehabilitated Units #	8	82	50	50	70
Proposed Expenditure	$0	$10,500,000	$3,000,000	$3,000,000	$5,000,000
Price Restricted Units #	0	0	0	0	0
Proposed Expenditure	$0	$0	$0	$0	$0
Total Unit #	82	152	50	50	70
Total Proposed Expenditures	$0	$17,500,000	$3,000,000	$3,000,000	$5,000,000

In addition to the aforementioned projects, the Agency anticipates expending approximately $14,838,000 on the following programs in the Project Area:

1. Homeownership Initiative consists of the conversion of existing rental properties to limited equity cooperatives or condominiums, in order to provide ownership opportunities to households of low and moderate income.
2. Responses to Housing Opportunities is a program that provides funds for the CRA/LA to pursue its housing objectives or incurred costs prior to Board approval of specific projects.

The table below provides the starting balance, expected deposits, and expenditure estimates of Housing Funds over each of the next five years.

	FY2009	FY2010	FY2011	FY2012	FY2013
Starting Balance	**$6,512,928**	**$7,481,657**	**($2,551,037)**	**($4,574,271)**	**(6,436,666)**
Amount to be Deposited	$6,114,009	$8,907,010	$6,413,011	$6,578,012	$6,746,013
Estimate of Expenditures	($1,435,780)	($1,439,704)	($1,726,745)	($1,730,907)	($1,735,194)
	($0)	($17,500,000)	($3,000,000)	($3,000,000)	($5,000,000)
	($3,709,500)	($0)	($3,709,500)	($3,709,500)	($3,709,500)
Ending Balance	**$7,481,657**	**($2,551,037)**	**($4,574,271)**	**($6,436,666)**	**($10,135,347)**

D. APPLICABLE LOW AND MODERATE INCOME HOUSING REQUIREMENTS

1. Replacement Housing Obligation

The CRA/LA is required to meet replacement housing obligations pursuant to Section 33413(a). This section requires the CRA/LA to replace, on a one-for-one basis, all units occupied by low and moderate-income households that are removed from the inventory as a result of CRA/LA actions. The removed units must be replaced within four years of removal. In addition to matching the number of dwelling units, the CRA/LA must also replace an equal or greater number of bedrooms.

All replacement units for dwelling units removed on or after January 1, 2002, must be affordable to persons in the same or lower income category (if removed prior to January 1, 2002, 75% of replacement units must be affordable to persons in the same or lower income category). However, replacement housing units do not have to match other characteristics, such as rental vs. ownership and family vs. senior housing, as the units removed from inventory. Also, replacement units can be developed anywhere within the City limits. Section 33490 of the CRL requires that if an implementation plan contains projects that could result in the removal of low and moderate income housing units, the plan must identify locations suitable for the replacement of such housing.

a. Past Removal of Low-Mod Income Units: Based on the previous implementation plan, the CRA/LA removed 12 dwelling units as a result of the Villas at Gower Project at the northeast corner of Gower Street. As part of this project, 70 affordable very low-income units will be created. Pursuant to Section 33413(a), 12 of the 70 affordable units at the Villas at Gower project replaced the units previously removed from this site.

	Very Low Income		Low Income		Moderate Income		Total	
	Units	**Bdrms**	**Units**	**Bdrms**	**Units**	**Bdrms**	**Units**	**Bdrms**
Fulfillment	12	4 Singles and 8-2 bedrooms	0	0	0	0	12	4 singles and 8-2 bedrooms
Obligation	12	0	0	0	0	0	12	4 singles and 8-2 bedrooms
Surplus/(Deficit)	0	0	0	0	0	0	0	0

As illustrated in the preceding table, the CRA/LA has fulfilled the 12-units, 2-bedroom replacement housing obligation.

b. Future Removal of Low-Mod Income Units: This Implementation Plan does not include projects or programs that would result in the removal of housing units from the low and moderate income housing stock. Therefore, there is no requirement to identify locations for replacement housing units.

2. Inclusionary Housing Obligation

The CRA/LA is required to comply with the affordable housing unit production requirements imposed by Section 33413(b):

a. Subparagraph (1) of the Section requires that at least 30% of all housing units developed by the CRA/LA be affordable to persons and families of low and moderate income.[4] Affordability restrictions must be maintained by long-term covenants. Of these low and moderate-income units, 50% must be affordable to persons and families of very low income.

b. Subparagraph (2) of Section 33413(b) requires that at least 15% of all housing developed in the Project Area by entities other than the CRA/LA be affordable to persons and families of low and moderate income. Affordability restrictions must be maintained by long-term covenants. Of these low and moderate-income units, 40% must be affordable to persons and families of very low income.

To determine the number of units that must be developed in order to comply with this requirement, and to identify how much of this requirement will be satisfied by the activities included in this Implementation Plan, a brief review of past and anticipated housing development activity in the Project Area is presented below. It should be noted that the CRA/LA has not produced any housing units directly and therefore Subparagraph (1) of Section 33413(b) is not applicable.

[4] The definition of agency-developed units is those units produced entirely by the CRA/LA.

a. Past Development of Housing in Project Area (1986 - 2008)

An estimated 3,351 housing units have been constructed or substantially rehabilitated within the Project Area since the 1986 adoption, all of which are subject to the inclusionary requirements outlined above. Of these units, 585 were developed during the previous Implementation Plan period.

b. Current and Future Housing Construction Activity in Project Area

Approximately 144 units are in the process of being developed within the Project Area, which will be subject to the inclusionary requirement. Also, there are 1269 additional units that are expected to be developed in the Project Area during the Implementation Plan period of 2009-2013. Therefore, during the Implementation Plan period, a total of 1413 units are estimated to be added to the Project Area. At this time, however, no units are expected to be developed in the Project Area during the remaining Plan Life from 2015-2027.

c. Inclusionary Housing Obligation

The Section 33413(b) inclusionary housing requirements triggered by historical and projected development in the Project Area from 1986 through the life of the Project Area are as follows:

	Units Developed	**Total Inclusionary Obligation (15%)**	**Very-Low Income Obligation (40% of 15% Total Obligation)**	**Low or Moderate Income Obligation (60% of 15% Total Obligation)**
Current Obligation (1986 – 2008)	3,351	503	201	302
Implementation Plan (2009 – 2013)	1,413	212	85	127
Remaining Plan Life (2015 – 2027)	0	0	0	0
Totals (1986 – 2013)	**4,764**	**715**	**286**	**429**

Source: Building and demolition data supplied by CRA/LA; First American Real Estate Solutions MetroScan; Agency staff.

Therefore, the inclusionary housing obligation during the Implementation Plan period totals 212 affordable units, with 85 of those units affordable to and occupied by very low-income households. The maximum inclusionary housing obligation for the Project Area is estimated at 715 units, with 286 of those units affordable to and occupied by very low-income households.

d. Inclusionary Housing Fulfillment

Since 1986, a total of 1,297 inclusionary units have been added to the Project Area.

The following affordable projects are anticipated to be constructed during the Implementation Plan period.

Project Name	Very-Low Income Units	Low / Moderate Income Units	Total Affordable Units	Estimated Completion Date
Bricker Building Rehabilitation	2 units @50% credit = 1 unit	14 Units @50% credit = 7 units	8	FY2009
Hollywood & Vine	0	74	74	FY2009
Bungalow Courts Rehabilitation	15	17	32	FY2010
Villas at Gower	70	0	70	FY2011
Single Room Occupancy	220	0	220	FY2013
Totals	**306**	**98**	**404**	

The following table estimates the current and life of plan inclusionary housing status:

	Very-Low Income Units	Low / Moderate Income Units	Total Affordable Units
1986 – 2008 Obligation	(201)	(302)	(503)
2009 – 2014 Obligation	(85)	(127)	(212)
2015 – 2027 Obligation	(0)	(0)	(0)
Total Obligation	*(286)*	*(429)*	*(715)*
1986 – 2008 Production	1,297	0	1,297
2009 – 2014 Production	306	98	404
Inclusionary Surplus/(Deficit)	**1,317**	**(331)**	**986**

In summary, the Agency's affordable housing obligation is 703 units, with 271 affordable to very low-income households. Thus, the Agency is anticipated to meet the low and moderate income housing production requirements imposed by Section 33413(b).

E. USE OF LOW AND MODERATE INCOME HOUSING FUND

1. Set-Aside of Tax Increment

The Project Area is subject to the Section 33334.2 requirement to allocate a minimum of 20% of the gross tax increment ("Set-Aside") to affordable housing activities. The Set-Aside is required to be deposited into a Housing Fund created to hold monies until expended. The projections of deposits into the Housing Fund are discussed in the following section of the Implementation Plan.

2. Proportional Expenditures of Housing Fund Monies

The Project Area is subject to the Section 33334.4 requirement that the Agency expend Housing Fund monies in accordance with income and age proportionality tests. These tests must be met between January 1, 2002, and December 31, 2013, and then again at 10-year intervals throughout the remaining life of the Redevelopment Plan. These tests do not have to be met on an annual basis nor are they applied to unit production.

a. Net Housing Fund Proceeds

To estimate the amount of proceeds that will be available for expenditure from January 1, 2002, to June 30, 2013, the following table illustrates the assumptions and calculations:

Fiscal Year	Tax Increment Deposits	Other Deposits	(Less) Administrative Expenses	(Less) Debt Service Payments	Net Housing Fund Proceeds
2002	$1,069,000	$3,899,000	($138,000)	($528,000)	$4,302,000
2003	$3,980,000	$98,000	($406,000)	($1,067,000)	$2,605,000
2004	$3,658,000	$3,282,000	($377,000)	($1,176,000)	$5,387,000
2005	$2,950,000	$82,000	($429,000)	($1,268,000)	$1,335,000
2006	$4,039,000	$7,021,000	($419,000)	($1,268,000	$9,373,000
2007	$5,888,000	$157,000	($303,000)	($1,280,000)	$4,462,000
2008	$5,675,000	$3,015,000	($809,000)	($1,022,000)	$6,859,000
2009	$5,894,000	$218,000	($130,780)	($1,305,000)	$4,807,000
2010	$6,125,000	$2,780,000	($134,704)	($1,305,000)	$7,600,000
2011	$6,285,000	$126,000	($138,745)	($1,588,000)	$4,823,000
2012	$6,447,000	$129,000	($142,907)	($1,588,000)	$4,988,000
2013	$6,612,000	$132,000	($147,194)	($1,588,000)	$5,156,000
Total Net Proceeds	**$58,622,000**	**$20,939,000**	**($3,575,330)**	**($14,983,000)**	**$61,697,000**

As shown above, a total of **$61,697,000** of net proceeds are estimated to be deposited into the Housing Fund from January 1, 2002 through June 30, 2013.

b. Very-low and Low Income Housing Expenditures

The income proportionality test requires that the CRA/LA expend Housing Funds in proportion to the housing needs that have been determined for the community pursuant to Section 65584 of the Government Code. The proportionality test used in this Implementation Plan is based on information contained within the City's General Plan. Based on the City's General Plan, the City's minimum required allocation for very low and low-income expenditures, and maximum moderate-income housing expenditures are:

Category:	Housing Need[5]	Threshold
Very-Low Income	17,990	At least 45%
Low Income	10,416	At least 26%
Moderate Income	11,314	At most 29%

It should be noted that the CRA/LA is entitled to expend a disproportionate amount of the funds for very low-income households, and to subtract a commensurate amount from the low and/or moderate-income thresholds. Similarly, the CRA/LA can provide a disproportionate amount of funding for low income housing by reducing the amount of funds allocated to moderate-income households. In no event can the expenditures targeted to moderate-income households exceed the established threshold amount.

As shown above, a total of **$61,697,000** of net proceeds are estimated to be deposited into the Housing Fund between 2002 and 2013. These funds must comply with the following distribution formulas:

Minimum Estimated Expenditure on Very-Low Income Units @ 45%	$27,763,650
Minimum Estimated Expenditure on Low Income Units @ 26%	$16,041,220
Maximum Estimated Expenditure on Moderate Income Units @ 29%	$17,892,130

As of the end of fiscal year 2008, the Agency had spent the following net proceeds by category:

[5] Source: Regional Housing Needs, 1998-2005, adopted by Southern California Association of Governments, Regional Council, on November 2, 2000.

January 1, 2002 – FY2008	Actual Expenditures	As a % of Requirements
Very-Low Income	$14,751,925	53%
Low Income	$15,198,378	95%
Moderate Income	$0	0%
Total Expenditures	**$29,950,303**	

As described on pages 26 through 28, the CRA/LA plans to expend the following net proceeds by category during the 2009 through 2013 Implementation Plan period:

Implementation Plan Period	Actual Expenditures	As a % of Requirements
Very-Low Income	$32,675,500	118%
Low Income	$10,662,500	65%
Moderate Income	$0	0%
Total Expenditures	**$43,338,000**	

Therefore, the following summarizes the remaining net proceeds that must be spent by June 30, 2013, by category.

	Estimated Net Proceed Expenditure Requirements	(Less) 2002 – FY2008 Expenditures	(Less) Implementation Plan Period Expenditures	Balance to Spend by June 30, 2014
Very-Low Income	$27,763,650	($14,751,925)	($32,675,500)	0
Low Income	$16,041,220	($15,198,378)	($10,662,500)	0
Moderate Income	$17,892,130	($0)	$0	$17,892,130
Total Expenditures	**$61,697,000**	**($29,950,303)**	**($43,338,000)**	**$17,892,130**

The CRA/LA plans to expend the remaining estimated Housing Funds so that by June 30, 2013, it has met its obligation to allocate 45% of the Housing Fund project and program expenditures to very-low income households, 26% of the funds to low income households, and 29% of the funds to moderate income households. Thus, the CRA/LA anticipates meeting the income targeting standards imposed by Section 33334.4.

c. Age Restricted Housing Expenditures

Section 33334.4 also requires that the CRA/LA assist housing that is available to all persons, regardless of age, in at least the same proportion as the households earning below 80% of the median income and under age 65 bears to the City's total households earning below 80% of the median income. The 2000 Census indicates that 80% of the CRA/LA expenditures on affordable housing projects must be spent to assist projects that do not impose age restrictions on the residents.[6] Therefore, the maximum proportion of the net Housing Fund proceeds that the CRA/LA is allowed to spend on age-restricted projects is 20%.

As shown above, a total of **$61,697,000** of net proceeds are estimated to be deposited into the Housing Fund between 2002 and 2013. These funds must comply with the following distribution formulas:

Maximum Estimated Expenditure on Age Restricted Projects @ 20%	**$12,339,400**
Minimum Estimated Expenditure on Non-Age Restricted Projects @ 80%	**$49,357,600**

As of the end of fiscal year 2008, the CRA/LA had spent the following net proceeds by category:

January 1, 2002 – FY2008	**Actual Expenditures**	**As a % of Requirements**
Age Restricted Projects	$11,018,151	89%
Non-Age Restricted Projects	$18,932,152	38%
Total Expenditures	**$29,950,303**	

As described on pages 26 through 28, the CRA/LA plans to expend the following net proceeds by category during the 2009 through 2013 Implementation Plan period:

Implementation Plan Period	**Actual Expenditures**	**As a % of Requirements**
Age Restricted Projects	$0	0%
Non-Age Restricted Projects	$43,338,000	88%
Total Expenditures	**$43,338,000**	

[6] CHAS data provided by the United States Housing and Urban Development Department. A total of 116,975 of the 580,977 total households earning below 80% of the median are designated as senior citizen households.

Therefore, the following summarizes the remaining net proceeds that must be spent by December 31, 2013, by category.

	Estimated Net Proceed Expenditure Requirements	(Less) FY 2002 through FY 2008 Expenditures	(Less) Implementation Plan Period Expenditures	Balance to Spend by December 31, 2013
Age Restricted Projects	$12,339,400	($11,018,151)	($0)	N/A
Non-Age Restricted Projects	$49,357,600	($18,932,152)	($43,338,000)	N/A
Total Expenditures	**$61,697,000**	**($29,950,303)**	**($43,338,000)**	**($11,591,303)**

The CRA/LA plans to expend the remaining estimated Housing Funds so that by December 31, 2013, it has met its obligation to allocate at least 80% of the Housing Fund project and program expenditures to under age 65 households. Thus, the CRA/LA anticipates meeting the age restriction targeting standards imposed by Section 33334.4.

F. COMPLIANCE BY END OF EFFECTIVENESS OF PLAN

Because the Redevelopment Plan for the Project Area expires on May 7, 2027, this section is not applicable.

V. NEXT STEPS

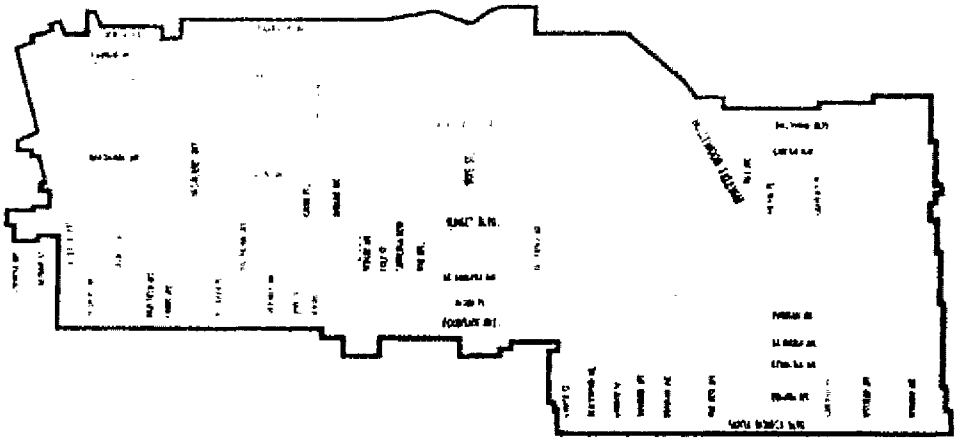
Pursuant to the requirements of California Redevelopment Law, the CRA/LA will hold a public hearing on the progress of housing and non-housing projects and programs for the Project Area between the second and third year of the next Five Year Implementation Plan Report.

Project Area Map "Exhibit A" follows.

EXHIBIT A - PROJECT AREA MAP

Hollywood

CRA/LA



ENCLOSURE 2

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

WEST DISTRICT

FIX THE CITY, etc.,

Petitioner and Plaintiff,

vs.

CITY OF LOS ANGELES; LOS ANGELES CITY COUNCIL; LOS ANGELES DEPT. OF CITY PLANNING; and DOES 1 through 100, inclusive,

Respondents and Defendants.

HOLLYWOOD CHAMBER OF COMMERCE,

Intervenor.

CASE NO. BS138580

TENTATIVE DECISION AND PROPOSED STATEMENT OF DECISION

LA MIRADA AVENUE NEIGHBORHOOD ASSN. OF HOLLYWOOD, etc.,

Petitioner and Plaintiff,

vs.

CITY OF LOS ANGELES; CITY COUNCIL OF THE CITY OF LOS ANGELES; and DOES 1 through 100, inclusive,

Respondents and Defendants.

CASE NO. BS138369

TENTATIVE DECISION AND PROPOSED STATEMENT OF DECISION

HOLLYWOOD CHAMBER OF COMMERCE,
Intervenor.

SAVE HOLLYWOOD.ORG, aka PEOPLE FOR LIVABLE COMMUNITIES, etc., HOLLYWOODIANS ENCOURAGING LOGICAL PLANNING, etc.,

Petitioners/Plaintiffs,

vs.

THE CITY OF LOS ANGELES, CITY COUNCIL OF THE CITY OF LOS ANGELES, CITY ATTORNEY OFFICE OF CITY OF LOS ANGELES, HERB WESSON PRESIDENT OF CITY COUNCIL, CARMEN TRUTANICH CITY ATTORNEY, DOES 1 through 100, inclusive,

Respondents/Defendants.

HOLLYWOOD CHAMBER OF COMMERCE,

Intervenor.

CASE NO. **BS138370**

TENTATIVE DECISION AND PROPOSED STATEMENT OF DECISION

These matters having been tried on September 16 and 17, 2013, and having been submitted for decision, the Court now rules as follows.

INTRODUCTION

The Hollywood Community Plan Update (HCPU) (and its corollary environmental impact report [EIR]), which is a principal subject of this litigation, is a comprehensive, visionary and voluminous planning document which thoughtfully analyzes the potential for the geographic area commonly referred to as Hollywood (as defined in its several

hundred pages). The HCPU includes scores of pages of text, detailed maps and tables which together express the finest thoughts of dedicated city planners. The HCPU is intended to be *the* essential component of the General Plan Framework (the Framework) for the City of Los Angeles (the City) as the General Plan for the City (in all of its elements) is applicable to planning and potential growth in Hollywood.

This otherwise well-conceived plan is also fundamentally flawed, and fatally so in its present iteration. As petitioners have articulated, and as will be discussed below, the HCPU, and its accompanying EIR, contain errors of fact and of law that compel granting relief to the community groups which challenge adoption of the HCPU and its EIR in their present forms.

While one can appreciate the goal of finalizing adoption of the HCPU, its accompanying EIR and related documents, and doing so as close to "on schedule" as possible given the many years since the City began its staged revisions to its General Plan planning documents (culminating in adoption of the Framework),[1] forging ahead in the processing of the HCPU, EIR and related documents in this case based on fundamentally flawed factual premises has resulted in a failure to proceed in the manner required by law. This and other bases for the rulings now made are set out below.

TRIAL PROCEEDINGS

The matter was tried to the Court on September 16 and 17, 2013. Prior thereto the parties filed extensive briefs, followed by their arguments at length at trial. Following the trial, the parties have filed requests for statement of decision (in addition to that provided for in Public Resources Code section 21005 (c) [requiring that a court specify

---

[1] The first draft of the Framework was circulated to the public almost twenty years ago, in July 1994. It was not finalized until eleven years later when review of the decision of the Court of Appeal of late 2004 upholding a revised version of the Framework was denied review by the California Supreme Court in February 2005. The attenuated history of adoption of the Framework is described in *Federation of Hillside and Canyon Associations v. City of Los Angeles* (2000) 83 Cal.App.4th 1252 [*Federation I*] and *Federation of Hillside and Canyon Associations v. City of Los Angeles* (2005) 126 Cal.App.4th 1180 [*Federation II*].

The HCPU cannot survive in its present form and substance in the face of these very substantial inconsistencies. The HCPU is fatally flawed as a planning document as it presently stands.

CONCLUSION[27]

For the reasons stated, petitioners are entitled to relief as follows:

(1) to a peremptory writ of mandate ordering respondents and defendants City and City Council to (a) rescind, vacate and set aside all actions approving the HCPU and certifying the EIR adopted in connection therewith and all related approvals issued in furtherance of the HCPU, including but not limited to the text and maps associated with the HCPU, the Resolution amending the Hollywood Community Plan, the adoption of rezoning actions taken to reflect zoning changes contained in the HCPU, all amendments to the General Plan Transportation and Framework Elements made to reflect changes in the HCPU, adopting the Statement of Overriding Considerations, adopting the Mitigation and Monitoring Program, and adopting Findings in support of the foregoing; and (b) initiate the process of amending the HCP in a manner that conforms to the policies and objectives of the General Plan and the requirements of CEQA;

(2) an injunction that respondents and defendants City and City Council, their officers, employees ,agents, boards ,commissions and other subdivisions shall not grant any authority, permits or entitlements which derive from the HCPU or its EIR until an adequate and valid EIR is prepared, circulated and certified as complete and is consistent with CEQA, CEQA Guidelines, and all other applicable laws, and until legally adequate findings of consistence are made as required pursuant to the Charter of the

---

[27] The relief set out below is the full relief to be awarded in the three cases. Any argument made and not addresses is deemed rejected.

City of Los Angeles and other applicable laws;

(3) attorneys fees and costs as may hereafter be determined.

DATED: December 10, 2013

ALLAN J. GOODMAN
JUDGE OF THE SUPERIOR COURT

Judge Rules Hollywood Community Plan 'Fundamentally Flawed'

By City News Service

Opponents of a Hollywood-area development plan that cleared the way for denser projects and taller buildings were celebrating Wednesday a judge's tentative ruling that the zoning blueprint is "fundamentally flawed, and fatally so."

The 41-page tentative ruling issued Tuesday by Los Angeles Superior Court Judge Allan J. Goodman could throw a wrench into proposed projects that were based on the Hollywood Community Plan, which was approved by the City Council last year.

The planning document was approved with vocal support from then-City Councilman Eric Garcetti, now the mayor, and vigorous opposition from Hollywood residents' groups who contended the plan would increase traffic congestion.

Supporters of the development plan said it would help the city transform run-down and crime-plagued neighborhoods into bustling residential and commercial centers.

In his tentative ruling, Goodman said the Hollywood Community Plan was based on outdated population estimates from 2004 and 2005 and does not properly address an increased need for city services. He ordered the city to rescind the plan and to stop issuing permits for projects that were based on the community plan.

"It's a significant setback," said Beverly Palmer, an attorney for Fix the City, one of three groups that filed lawsuits in 2012 challenging the plan.

While city officials might not be required to start from scratch, "they will have to begin much of the process again" under the ruling, Palmer said.

Planning Department Director Michael LoGrande said he and other planning officials were "disappointed" by the ruling and "will be discussing our appeal options" with the city attorney.

Meanwhile, plaintiffs in the lawsuit hailed the ruling.

"We're very pleased," said Mike Eveloff of Fix the City. "I think when you take a look at the plan, it really didn't satisfy the legal requirements for a community plan."

George Abraham of SaveHollywood.org, another group that challenged the plan in court, said the city also should have included an alternative that addressed a declining population in Hollywood.

He said high-density, "transit-oriented" development plans, which are dependant on increased public

transit usage, have lost favor in other places and should not be adopted in Hollywood.

"Our position overall is that Hollywood is the wrong place to concentrate development," he said.

Goodman's ruling applies to both groups' lawsuits, as well as that of a third group, La Mirada Avenue Neighborhood Association of Hollywood.

Garcetti and City Attorney Mike Feuer should "take to heart Judge Goodman's rebuke over the use of false data," said attorney Richard MacNaughton, who represents Save Hollywood.org and other groups. "This admonition applies not only to the Hollywood Community Plan, which now must be redone, but also to all other" environmental impact reports and official documents.

"In particular, Mayor Garcetti and City Attorney Feuer need to stop the similar misbehavior with the other community plans which are presently being prepared," he said.

Garcetti spokesman Yusef Robb said the mayor's office was still "reviewing the court's decision."

Next on Patch

ENCLOSURE 3

engineering group, inc.

traffic engineering & design
transportation planning
parking
acoustical engineering
air quality & ghg

January 11, 2019

Mr. Douglas Carstens
CHATTEN-BROWN & CARSTENS LLP
2200 Pacific Coast Highway, Ste. 318
Hermosa Beach, CA 90254

Subject: Crossroads Hollywood EIR and Traffic Study Review, City of Los Angeles

Dear Mr. Carstens:

Introduction

RK ENGINEERING GROUP, INC. (RK) is pleased to submit this traffic review of the environmental documentation and various traffic impact studies for the Crossroads Hollywood project within the City of Los Angeles. It is our understanding that your clients (AIDS Healthcare Foundation and Livable LA) are concerned with this major development as it would impact their current operations. The AIDS Healthcare Foundation is located at 6255 West Sunset Boulevard approximately one half mile from the proposed project. The proposed development will directly impact the property owned by the Hollywood Media Center by both the construction and operation of the proposed Crossroads Hollywood project located to the northeast and west of their property.

RK Engineering Group, Inc. (RK) has been retained to review the technical documentation with respect to traffic, circulation and parking. As the Founding Principal of RK and a registered Civil and Traffic Engineer in the State of California, I have over 50 years of transportation experience in the field, and have worked for numerous clients throughout Southern California. I have worked for Caltrans, other private consulting firms and am currently the Consulting Traffic Engineer for several cities throughout Southern California. I have prepared and reviewed thousands of traffic impact studies during my career. A copy of my resume is included in Appendix A.

RK has been requested to review the traffic and parking documentation with respect to the Crossroads Hollywood project. The original project was evaluated in the June 2016 traffic study prepared by Gibson Transportation Consultants, Inc. That project included 1,432,500 square feet of mixed use development including hotel, condominiums, apartments, commercial and office uses. A modification to the project was proposed in early 2018 which reduced the overall scale of the project. The modified Project (including existing uses to be retained within the Crossroads of the World complex) would consist of 950

4000 westerly place, ste. 280
newport beach, ca 92660
(949) 474-0809
rkengineer.com

residential apartment units, 308 hotel rooms and approximately 190,000 square feet of retail and restaurant uses.

As a result of the changes, the project was modified in the final EIR and was evaluated in the February 20, 2018 memorandum prepared by Gibson Transportation Consultants Inc. That project included 1,381,000 square feet of development including hotel, apartment commercial, and office uses. The project was further refined in August 2018 and was evaluated in the July 30, 2018 memorandum prepared by Gibson Transportation Consultants Inc. That project included 1,381,000 square feet of development including a hotel, apartment, commercial uses including a market, an entertainment venue and a movie theater.

RK has reviewed the project from a traffic, circulation and parking standpoint and categorized our comments based upon the following topics:

1. On-site traffic, circulation and parking impacts.
2. Overall traffic impacts to the study area.
3. Traffic mitigation programs.
4. Residential street segment impact review.
5. Construction impacts of the project.

Based upon RK's review, a number of items have been identified which require additional review or requirements of the project to fully address the traffic impact, circulation and parking effects of the proposed development. These will require additional analysis, and additional mitigation measures which can be incorporated as conditions of approval for the project.

Comments

1. On-Site Impacts

a. A more complete pedestrian circulation plan is necessary to fully understand how the project will function. The project relies heavily on pedestrian circulation between the various components of the project. *Question: How would the proposed Paseo function with respect to pedestrians crossing the adjacent streets?* A more complete a pedestrian plan is necessary to fully evaluate the pedestrian circulation system.

b. There is no analysis of local street impacts directly in the vicinity of the project. While some local intersections were reviewed in the various traffic studies the actual neighborhood increase in traffic on the adjacent local streets have not been considered. The project will generate a substantial amount of traffic to the surrounding street system, including the pass-by traffic that was eliminated from the off-site traffic analysis has to be evaluated. An evaluation of future traffic volumes with the project on this local streets needs to be done. An assessment of available capacity is necessary to determine what, if any, impacts the project will have to the local streets within the project area. This should include McCadden Place and other local streets which has an existing operating business that would be affected by the project during both construction and operations.

c. There needs to be more detailed driveway analysis of capacity and potential queuing at the various project sites. It is not sufficient to just identify the number of driveways being served by each building. The traffic flows into and out of those driveways as they may affect the adjacent streets must be evaluated as well.

d. Identification of location of valet service and available queuing capacity needs to be made. *Questions: Which of the various project components will have a valet service? How will the valet service operate? Will there enough storage space available as to not affect other businesses in the area?*

e. The New Stand-Alone Parking Structure that was not in the Original Plan will have impacts that must be analyzed and evaluated. This will have to include the ingress/egress to the structure and any traffic impacts to the adjacent local street system.

f. *Question: Will there be any controlled gates at the driveways into the various buildings and parking structures?* If so, a queuing analysis is necessary to determine if those gates would have sufficient capacity so that no queuing into the adjacent local streets will occur. This is a requirement of the LADOT Traffic Study Guidelines.

g. There has been no analysis of the parking demand and capacity for the project. There needs to be a ULI (Urban Land Institute) shared parking evaluation for each of the parking facilities and buildings. This is necessary to determine whether there is sufficient parking or whether it will overflow onto the very limited available parking on the adjacent streets. This is critical since a significant amount of on-street parking is proposed to be removed with the construction of the project.

h. There will be substantial amount of lost on-street parking in the area. *Question: How will this parking be made up?* The project should replace all existing on street parking that is lost by providing additional public parking within the proposed new facilities.

i. Of particular concern to our client is the operation of local roadways in the vicinity of the project since their facility is within one-half mile of the project. This would include McCadden Place and other local roadways both during construction and once the project has been completed. McCadden Place must continue to operate as a two-way roadway with existing parking provided as it currently exists. A further discussion of the operation of these roadways including McCadden Place is included in the Construction section of these comments.

2. Traffic Impact Analysis

a. Given the type of land uses, including restaurants, bars, commercial and entertainment uses, a Saturday traffic analysis should be completed as part of the traffic impact analysis. It is likely that peak times of these uses would occur during the PM peak hours and on weekends, especially on Saturday evenings, therefore, this needs to be assessed for the entire the study area.

b. The refined project (August 2018) includes an entertainment venue and 30,000 square feet of movie theater. The trip generation rates for these uses have been based upon typical commercial/retail trip rates as opposed to potentially higher trip rates for entertainment uses that occur in the evening and on weekends. The impacts of entertainment uses need to be assessed, especially with respect to weekend activities.

c. Although a significant off-site intersection analysis has been completed as part of traffic studies, a review of local driveway impacts and potential queuing impacts to other uses in the study area along the adjacent local streets needs to be evaluated and reviewed.

d. Even with the reduction of trips and TDM (Transportation Demand Management Plan) with the modified project there are still five (5) significantly impact intersections where the project has direct significant impacts. Of particular concern are the intersections that are deficient along Sunset Boulevard including Vine Street at Sunset Boulevard and Cahuenga Boulevard at Sunset Boulevard which are adjacent to the AIDS Healthcare Foundation offices at 6255 West Sunset Boulevard.

With the implementation of the mitigation program, the impacts at the following five (5) intersections would remain significant and unavoidable under Future with Project with Mitigation Conditions with development of the modified Project.

#37. Highland Avenue & Hollywood Boulevard (morning peak hour)
#63. La Brea Avenue & Sunset Boulevard (morning and afternoon peak hours)
#65. Highland Avenue & Sunset Boulevard (morning and afternoon peak hours)
#70. Cahuenga Boulevard & Sunset Boulevard (morning and afternoon peak hours)
#72. Vine Street & Sunset Boulevard (morning and afternoon peak hours)

The proposed modified project must provide additional improvements and financial contributions to improve the roadway system especially along Sunset Boulevard.

e. The list of related projects considered in the traffic study should include any uses known at the time of the NOP (Notice of Preparation). Please see Appendix B for additional potential related projects that should be considered as part of the traffic impact assessment.

f. The trip generation rates for the study have been based up on the ITE (Institute Transportation Engineers) 9th edition which is appropriate for the time when the initial traffic study was completed. However, the trip generation assessment included a substantial reduction in trips as a result of transit, internal capture, pass-by trips and the proposed TDM plan. The combined effect of these trip reductions is over 40% (not including existing use credit) of daily and PM peak hour trips. This seems overly optimistic given the types of land uses for the area. Granted some credit for these uses is appropriate, however, the combined reduction of over 40% is unrealistic and not considered an appropriate or conservative analysis.

g. There must be a determination made of whether the existing use credit is appropriate. Any trip credit must be for uses that were in operation at the time of the MOU (Memorandum of Understanding) which was dated in 2016. *Question: Were all of these uses operating at the time of the MOU?* Even with all the additional trip reduction credits taken in the traffic study there are still five (5) signalized intersections where an unavoidable direct impact occurs as a result of the project. As discussed, further in the traffic

mitigation program comments below, additional improvements or financial contributions should be made to further reduce the significant direct impacts of the project.

3. Traffic Mitigation Program

a. The traffic mitigation program relies heavily on the TDM (Transportation Demand Management) Plan. It takes a credit for a 10% to 15% reduction in trips as a result of the TDM plan. The combination of credits which were taken for transit, internal trips and pass-by trips already substantially reduce the traffic impacts of the project. This in combination with the TDM credit of 10-15% results in a 40% reduction in gross trip generation which, as previously noted, seems unrealistic.

b. The project is proposed to contribute $650,000 to a transit trust fund and $500,000 to TSM (Traffic System Management) improvements for traffic signal upgrades, CCTV camera and System Loops. Given the size of this development and the potential amount of new trips generated, the amount of contribution for these facilities seems extremely low, given the 1,381,000 square feet of proposed development and subsequent trips generated by the project. Many local agencies have transportation fees for new development which would require a substantially higher financial commitment than what is be proposed by the project. Examples of these are discussed in section 3.d. below.

c. The project proposes to improve one intersection (#66) Los Palmas Avenue at Sunset Boulevard. No other physical improvements to the significantly impacted intersections are identified. As a result, there will still be several unmitigated intersections as a result of the project. **The project needs to contribute a significantly larger amount of financial support to help fund transportation improvements within the impacted study area. This is especially true for the five (5) intersections that are significantly impacted by the project.**

d. As noted above, the proposed financial contribution of the project is quite low considering the size of the development and potential impacts to the study area intersections and roadway segments. Many Cities/Counties throughout Southern California require road fees to help fund roadway and transportation improvements. These fees would be a significantly higher than what is being proposed for the project. Many agencies typically charge approximately $6,000 for each multi-family unit and $4.50 to $7.50 per square feet per commercial uses. This would result in road/transportation

contributions which are 7-8 times what the project has offered to contribute. The project should contribute a greater financial contribution to the transportation improvements within the study area. This would also include funding traffic signals at Intersection #5 (Gowers Street at US 101 South Bound off ramp) and Intersection #8 (Los Palmas Avenue at Soma Avenue).

e. The traffic studies also identify significant impacts at some freeway ramps, therefore, the project should make a financial contribution to assist Caltrans in improving traffic operations at the local freeway ramp intersections within the study area.

4. Residential Street Segment Impact

a. The traffic study identifies six (6) neighborhoods which would be impacted by the proposed project as a result of potential "cut-through traffic". The project has offered funding of $500,000 for these improvements. This would result in only $83,330 per neighborhood. This seems extremely low to implement meaningful traffic calming and roadway segment improvements in the six (6) affected neighborhoods. Speed humps and cushions with signage and markings can cost $1,000 to $6,900 each. Speed Tables can cost $2,000 to $20,000 each. Mini roundabouts can cost as low as $20,000 to $50,000 or upward to $250,000 to $350,000 each. The size of the six (6) neighborhoods is very large and will require hundreds of these devices. The financial contribution should be increased for the local neighborhood street improvements given the significant size of the development.

5. Construction Impacts of the Project

a. A more detailed assessment of the specific roadway impacts during construction for each phase of development should be provided. The traffic study only provided a general assessment of potential construction impacts. More specific information is necessary to determine if additional mitigation measures are necessary, especially in the vicinity of the project.

b. The loss of 74 parking spaces during construction should be made up by the proposed development. Additional parking provisions are needed to accommodate the existing parking demand in the study area during both construction and when the proposed project is in operation.

c. McCadden Place and other local streets must be kept open during construction and operate in both directions. Closure of this roadway or a limitation to one-way operation would significantly impact current operating

uses in the area. A more detailed plan to ensure that McCadden Place is fully operational in both directions during construction must be made. Also, as noted above, any parking lost during construction should be made available during construction as currently exists. A detailed local street construction management plan construction management plan needs to be implemented to protect existing uses currently in operation.

d. There needs to be a provision to accommodate off-site parking for construction workers. As a result of the loss of existing parking and the demand for construction worker parking, more parking is expected to be needed than available. Parking must be accommodated either on-site or off-site without effecting existing operating uses in the area.

e. Construction vehicles must not block existing local streets during construction. While the streets are used for construction access, no parking or stopping of construction vehicles should occur during construction. Staging and parking areas for construction vehicles must be provided as to not affect existing uses and traffic operations in the area.

Conclusions

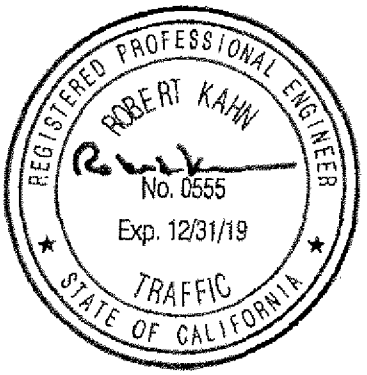
RK Engineering Group, Inc. has reviewed the original project, the modified project (Final EIR) and the refined project (August 2018) from a traffic, circulation and parking standpoint. Based upon this analysis, RK has identified a number of issues related to the on-site site plan, traffic impact analysis, significantly impacted intersections, mitigation program, impacts from the New Stand-Alone Parking Structure, residential street segment impact analysis, and construction impacts as it effects the local area, including the AIDS Healthcare Foundation and other nearby operating uses. These items have to be addressed and additional mitigation measures which should be provided have been identified above.

RK Engineering Group, Inc. appreciates this opportunity to work with Chatten-Brown and Carstens, LLP in support of your clients (AIDS Healthcare Foundation and Livable LA) which are located at 6255 Sunset Boulevard and are directly impacted by the construction and operation of the Crossroads Hollywood proposed project.

If you have any questions, please call me at (949) 474-0809.

Respectfully submitted,

RK ENGINEERING GROUP, INC.



Robert Kahn, P.E.
Principal

Registered Civil Engineer 20285
Registered Traffic Engineer 0555

Attachment
RK:ag/rk15063.doc
JN:2798-2019-01

Appendix A
Robert Kahn, P.E. **Resume**

RK engineering group, inc.

Robert Kahn, P.E., T.E

Founding Principal

Areas of Expertise

Traffic Engineering

Transportation Planning

Transportation Solutions

Traffic Impact Analysis

Circulation Systems for Planned Communities

Traffic Control Device Warrants

Traffic Calming

Traffic Safety Studies

Bicycle Planning

Parking Demand Studies

Transportation Demand Management

Traffic Signal, Signing and Striping Plans

Traffic Control Plans

Parking Lot Design

Acoustical Engineering

Noise Impact Studies

Expert Witness / Legal Services

Professional History

RK Engineering Group, Inc., Founding Principal
2001-Present

RKJK & Associates, Inc., Principal, 1990-2000

Robert Kahn and Associates, Inc., Principal, 1988-1990

Jack G. Raub Company,
Vice President Engineering Planning, 1977-1988

The Irvine Company, Program Engineer, 1972-1977

Caltrans CA Division of Highways, Assistant Engineer, 1968-1972

Representative Experience

Robert Kahn, P.E., has worked professionally in traffic engineering and transportation planning since 1968. He received his Master of Science degree in civil engineering from the University of California, Berkeley, Institute of Transportation and Traffic Engineering. Mr. Kahn received his Bachelors degree in Civil Engineering from the University of California, Berkeley.

Mr. Kahn started his career in California Division of Highways (Caltrans) and developed the first computerized surveillance and control system for the Los Angeles area. Mr. Kahn developed the California Incident Detection Logic which is utilized throughout California for the detection of traffic incidents on the freeway system.

Mr. Kahn has worked for a major land development company preparing Master Plans for infrastructure. He also has worked eleven years with a multi-disciplined consulting engineering firm in charge of the Engineering Planning Department. This included all facets of preliminary design, tentative map preparation, transportation and environmental engineering, and public agency coordination.

Mr. Kahn has provided traffic and transportation services to major planned communities including Aliso Viejo, Coto De Caza, Foothill Ranch, Highlands Ranch in Denver, Colorado, Mission Viejo, Talega Planned Community in San Clemente, and Wolf Valley Ranch in Temecula. He has also provided contract traffic engineering services to the Cities of Irvine, Norwalk, Perris and San Jacinto in Riverside County, California.

Mr. Kahn has prepared traffic impact studies for numerous communities throughout Southern California, Nevada and in Colorado. Major traffic impact studies include the Aliso Viejo Town Center, the Summit Development, the Shops at Mission Viejo, Kaleidoscope, Dana Point Headlands, Foothill Ranch, Talega, Majestic Spectrum, and Centre Pointe in the City of Chino.

His work in the area of parking demand studies and parking lot design has been extensive. Shared parking studies for the Aliso Viejo Town Center, Foothill Ranch Towne Centre, Trabuco Plaza and numerous commercial sites have been completed to accurately determine the peak parking demand for mixed use projects. Mr. Kahn has been able0 to make the most efficient utilization of parking lots by maximizing efficient and safe systems.

RK engineering group, inc.

Robert Kahn, P.E., T.E

Founding Principal

Education

University of California, Berkeley, M.S., Civil Engineering, 1968

University of California, Berkeley, B.S., Civil Engineering, 1967

University of California, Los Angeles, Graduate Courses in Transportation Systems, 1970

Registrations

California Registered Civil Engineer
No. 20285 – April 1971

California Registered Professional Engineer
Traffic, No. 0555 – June 1977

Colorado Professional Engineer
No. 22934, November 1984

Nevada Professional Engineer Civil
No. 10722 – March 1994

County of Orange, California Certified Acoustical Consultant
No. 201020 - 1984

Affiliations

Institute of Transportation Engineers (ITE)

American Society of Civil Engineers (ASCE)

Urban Land Institute (ULI)

Orange County Traffic Engineers Council (OCTEC)

Teaching

UCI Graduate Urban Design Studio Class – Guest Instructor

ITS Berkeley – Tech Transfer
Fundamentals of Traffic Engineering – Instructor

UCI Senior Civil Engineering Mentoring Program (CE181)

Mr. Kahn has been an innovator in developing and implementing traffic calming techniques. Over twenty years ago, Mr. Kahn refined the design and implementation standards for speed humps for use in local neighborhoods. Most recently, he has been involved in the development of modern roundabouts in lieu of traffic signals or other traffic control devices at intersections. Mr. Kahn previously presented the use of traffic calming devices in newly developing communities to the Institute of Transportation Engineers Traffic Calming Conference in Monterey, California.

Mr. Kahn has been involved in the design of traffic signal systems, signing and striping plans on hundreds of projects for both the public and private sector. Most recently, he has completed the design of several traffic signals which will serve the renovated Shops at Mission Viejo Mall. Mr. Kahn was in charge of a major ITS project for the City of Irvine, which provided fiberoptic interconnect and closed circuit TV along Barranca Parkway, Alton Parkway and Lake Forest Drive.

Mr. Kahn has been involved in acoustical engineering since 1978. He was in responsible charge of the Aliso Viejo Noise Monitoring Program which redefined the 65 CNEL noise contours for MCAS El Toro. He has also developed computer applications of the FHWA Noise Model.

Mr. Kahn has prepared numerous noise impact reports in the Aliso Viejo, Mission Viejo, Foothill Ranch, Santa Margarita, Ladera and Talega Planned Communities. Noise impacts from stationery sources including car washes, loading docks, air conditioning compressors, drive-thru speakers and other sources have been evaluated in the Aliso Viejo Auto Retail Center Noise Study, Albertsons Store 606 Noise Study-Rancho Cucamonga, Pro Source Distribution Building Final Noise Study in Ontario. Major specific plan and zone change noise studies have been prepared for the Summit Heights Specific Plan in Fontana, Lytle Creek Land and Resources Property in Rialto, Tamarack Square in Carlsbad, California, International Trade and Transportation Center in Kern County, California, and Sun City/Palm Springs.

Mr. Kahn founded the firm of Robert Kahn and Associates in 1988, which was the predecessor to RKJK & Associates, Inc. in 1990. He has made presentations to the ITE and the California Public Works Conference. Mr. Kahn has published numerous articles on traffic impact assessment, traffic calming, striping and the status of Bicycle Sharing in the USA. He was awarded the Wayne T property award in 2011-2012. Mr. Kahn has been a mentor and advisor to the UCI Senior Civil Engineering Project (CE181) for the past several years. He provides students the opportunity to develop a real life transportation project for the program.

RK engineering group, inc.

Robert Kahn, P.E., T.E. Principal

Robert Kahn has been involved in numerous legal cases as an expert witness and providing legal assistance in the area of traffic and environmental engineering. This has included traffic/parking impact analysis, traffic/circulation/parking impacts of ROW takes, traffic engineering design review, traffic safety studies and noise/vibration impact assessments. A sampling of these projects include the following cases:

- Tustin Avenue/Rose Drive Grade Separation Impact to Del Cerro Mobile Estates, City of Placentia
- 9582 Chapman Avenue – UU Shared Parking, City of Garden Grove
- Plantation Apartments Norwalk 12809 Kalnor Avenue I-5 Construction Noise Monitoring Assessment
- City of Huntington Beach vs. Alvarez, et al, Traffic Review of ROW taking
- Gene Autry Way Extension – Impacts to Anaheim Holiday Inn and Staybridge Suites Hotel, Anaheim
- UCSD Student Center Traffic and Parking Impact Review, City of San Diego
- Palma De La Reina Traffic Impact Analysis Review
- Newport Tech Center Traffic Study Review, Newport Beach
- City of Irvine Planning Area 18, 34 and 39 DEIR Traffic Impact Review, City of Irvine
- City of San Diego Big Box Ordinance, City of San Diego
- City of Yucaipa Big Box Ordinance, City of Yucaipa
- Electra Real Estates USA Mid Coast Corridor Transit Project Traffic/Circulation and Parking Impact Review, City of San Diego
- Rancho El Revino Specific Plan Traffic Impact Study Review
- President Hotel Santa Ana parking lot dispute
- Caceres vs. City of Fontana, represented City in an Intersection (Production at Santa Ana Ave.) Accident
- Corona vs. City of Fontana, represented City in an Intersection (Sierra Ave. and Summit Ave.) Accident
- Sunset and Gordon Mixed Use Site Traffic Review
- Baldwin Hills Crenshaw Plaza EIR and Traffic Study Review
- Saint Mary's University Wellness Pavilion EIR and Traffic Study Review
- 15 Degree South Residential Project Traffic Review
- Review of the OCTA Tustin Avenue Rose Drive Grade Separation Representing the Del Cerro Mobile Estates
- OCTA State College Blvd Grade Separation Representing the Fullerton Commerce Center and Fullerton Industrial Park

Appendix B
Other Related Projects

Other Related Projects

The EIR did not disclose the following other eleven (11) other related projects:

Project Name	Env. No.	Address	Link to CEQA Document(s)
Coronel Apartment Project	ENV-2012-110-EIR	1600-1608 N. Serrano Ave. & 1601-1605 N. Hobart Boulevard, Los Angeles, CA 90027	Final EIR: http://planning.lacity.org/eir/CoronelApt/FEIR/index.html Draft EIR: http://planning.lacity.org/eir/CoronelApt/DEIR/index.html
SunWest Project	ENV-2015-2448-EIR	5509, 5511, 5515, 5517, 5519, 5521,5523, 5525, 5527, 5529 West Sunset Boulevard; 1505, 1507, 1509, 1511,1515, 1523, 1525, 1527, 1529, 1531, 1535 North Western Avenue; and 5518 West Harold Way, Los Angeles, California, 90028	**Final EIR:** https://planning.lacity.org/eir/SunWest/FEIR/FEIR%20SunWest%20Project.html **Draft EIR:** https://planning.lacity.org/eir/sunwest/DEIR/DEIR%20SunWest%20Project.html
6200 West Sunset Boulevard Project	ENV-2015-3603-EIR	6200–6218 W. Sunset Boulevard, 1437–1441 N. El Centro Avenue, 6211 W. Leland Way, Los Angeles, California 90028	**Final EIR:** https://planning.lacity.org/eir/6200WestSunset/FEIR/Index.html **Draft EIR:** https://planning.lacity.org/eir/6200WestSunset/Deir/index.html
1375 St. Andrews Project	ENV-2015-4630-EIR	1365–1375 St. Andrews Place, 5604-5632 W De Longpre Avenue, and 5605-5607 W. Fernwood Avenue, Los Angeles, CA 90028	**Draft EIR:** https://planning.lacity.org/eir/1375_St_Andrews_Apts/Deir/DEIR%20Website.html
Edinburgh Avenue SLS	ENV-2016-1367-EIR	750-756 North Edinburgh Avenue,Los Angeles, CA 90046	**Draft EIR:** https://planning.lacity.org/eir/EdinburghAve/Deir/LA%20DEIR%20Posting%20Edinburgh%20Avenue%20SLS.html
citizenM Hollywood & Vine	ENV-2016-2846-EIR	1718 N. Vine Street, Los Angeles, CA 90028	**Initial Study:** https://planning.lacity.org/eir/nops/citizenM_HollywoodAndVine/is.pdf
Hollywood and Wilcox Project	ENV-2016-3177-EIR	6430–6440 W. Hollywood Boulevard and 1624–1648 N. Wilcox Avenue, Los Angeles, California, 90028	**Initial Study:** https://planning.lacity.org/eir/nops/HwdWilcox/is.pdf

6400 Sunset	ENV-2016-3631-EIR	6400 W. Sunset Boulevard, Los Angeles, California, 90028	**Initial Study:** https://planning.lacity.org/eir/nops/6400Sunset/Initial_Study.pdf **Sustainable Communities Project CEQA Exemption:** https://planning.lacity.org/eir/SCPEs/documents/6400_Sunset_Boulevard/Exemption.pdf
1360 N. Vine Street Project	ENV-2016-3778-EIR	1360 N. Vine Street, Los Angeles, California, 90028-8140	**Initial Study:** https://planning.lacity.org/eir/nops/1360%20Vine%20Street/InitialStudy_Checklist.pdf
5420 Sunset Project	ENV-2017-1084-EIR	5420–5450 West Sunset Boulevard, 1418–1440 North Western Avenue, and 1441 North Serrano Avenue, Los Angeles, California, 90027	**Initial Study:** https://planning.lacity.org/eir/nops/5420Sunset/5420%20Sunset%20Project%20Initial%20Study.pdf
Sunset Gower Studios Enhancement Plan	ENV-2017-5091-EIR	6010, 6050 and 6060 Sunset Boulevard, 1455 North Beachwood Drive, 1455 Gordon Street, and 1438 and 1440 North Gower Street, Los Angeles, CA 90028	**Initial Study:** https://planning.lacity.org/eir/nops/Sunset_Gower_Studios_EP/InitialStudy.pdf

The absence of data about these related projects' environmental effects undermines the accuracy of the EIR's determinations regarding the significance of the Crossroads Project's environmental effects. By omitting these 11 related projects from is discussion of the Project's environmental setting, the EIR *understates* the significance of cumulative impacts.

ENCLOSURE 4

CONSTRUCTION EMISSIONS IN THE EIR HAVE BEEN UNDER ESTIMATED

1. The construction schedule in the project description is not clearly defined. Construction emissions are calculated using the CalEEMod Model. The project is divided into four separate project components or Development Parcels, however, the assumptions used in the CalEEMod model shows only one construction phase per construction activity (demolition, grading, foundation, building construction, architectural coating, and paving) (see EIR Appendix C). That is to say, the EIR assumes that all demolition will occur at once, all grading will occur at once, all foundations will be built at once, etc., with only building construction and architectural coating overlapping. This project is so large, and the project components so well defined, that the CalEEMod modeling runs should be just as defined. The construction activities for each Development Parcel should have its own CalEEMod modeling run with its own demolition, grading, foundation, building, coating, and paving phases. As the CalEEMod model stands, it is not clear if only one construction crew will be moving from project component to component or if there will be several crews working on every project component concurrently.

   If the former is true, it seems unlikely that the project can be completed in the time allowed. For instance, the assumptions used in the CalEEMod model only allowed for 23 days to demolish everything for the entire project (Development Parcels A, B, and D). There are approximately 20 building that need to be demolished in the project components identified as Development Parcels A, B, and D. For simplicity, if Development Parcel C is untouched, it would still require the single construction crew to clear nearly an entire building per day to finish within the allotted 23 day time period. This is not likely and it is impossible for the crew size and equipment presented in the CalEEMode construction modeling runs in the EIR.

   If the latter is true, the equipment list used in the CalEEMod model runs is not sufficient to cover the construction activities required in the four Development Parcels. Going back to the demolition phase, the CalEEMod model assumed that there would be 3 air compressors, 3 concrete saws, 1 crane, 2 excavators, 2 loaders, and 1 welder used for demolition activities at all four construction sites. This means that the crews are either sharing equipment, or more likely, not enough construction equipment was included in the CalEEMod model to cover the demolition associated with all four Development Parcels. Further, some overlap of construction phases is expected if several crews are working concurrently. In the case where the demolition of a smaller component finishes before the demolition of a larger component, will they move directly into grading or will they wait until demolition has been completed on all other project components? Most developers will not pay to have a construction crew on standby so all the demolition can be complete before the next phase begins. The more likely scenario is that some of the construction phases will overlap.

   In either scenario (single crew or concurrent crews), the more accurate method of modeling the construction emissions would be to create a model for each of the four Development Parcels, as previously mentioned. If the developer is sure that all

demolition activities can be completed in 23 days, a mitigation measures must be imposed to limit demolition activities to 23 days to ensure the accuracy of the assumptions used in the CalEEMod model. This is not limited to the demolition phase and should apply to all phases of construction (grading, foundation, building construction, architectural coating, and paving).

2. Based on the CalEEMod assumptions in Appendix C of the EIR, all construction phases have reduced schedules from the default assumptions that are typically used in the CalEEMod model, except for architectural coating phase. Increasing the length of the architectural coating phase of construction has clearly been done to prevent the project from exceeding the CEQA daily VOC threshold of 75 lbs/day. This tactic is hiding the fact that VOC emissions from this project would be significant if the project uses the CalEEMod default assumptions for the amount of coatings used per day. This is evident when reviewing the model assumptions that assume there would be a massive amount of buildings that would require architectural coatings including: 892,808 square feet of non-residential exterior coatings; 2,678,424 square feet of non-residential interior coatings; 641,250 square feet of residential exterior coatings; and 1,923,750 square feet of residential interior coatings (see EIR Appendix C). Instead of hiding behind the stretched architectural coating schedule, the project must disclose the potential worst-case use of coatings, or impose a mitigation measure that limits the total VOC emissions from the project to 61 lbs/day, the reported maximum VOC construction emissions level. Further, the CalEEMod model assumes that low VOC coatings will be used including coatings with a VOC content of 100 grams per liter (g/l) for non-residential exterior paints and 50 g/l VOC coatings for non-residential interior coatings (see Appendix C of the EIR). To make sure that the VOC emissions from construction activities are not significant, another mitigation measure must be developed to limit the VOC content of the coatings used for the project to the assumptions that were used in the CalEEMod model to generate the construction emission calculations.

THE LST METHODOLOGY USE THE EIR IS INCORRECT AND INADEQUATE

3. The EIR has used the wrong analysis to estimate localized emissions impact. The EIR indicates that it is acceptable to use the SCAQMD's screening tables for projects greater than 5 acres in size (see DEIR pages IV.B-33 thru 35). The SCAQMD recommends using the screening tables only for projects that are less than or equal to five acres. The SCAQMD states in their Localized Significance Threshold (LST) Methodology (revised July 2008)[1]: "It is recommended that lead agencies perform project-specific air quality modeling for larger projects." Therefore, the SCAQMD guidance does not concur with the conclusion in the EIR that the LST methodology can be applied to projects greater than 5 acres. Project-specific modeling is required to estimate the potential localized air quality impacts as the SCAQMD's screening tables do not apply to sites greater than 5 acres. The SCAQMD in fact provides guidance for larger projects to determine localized impacts either through dispersion modeling of onsite emission sources or other

[1] SCAQMD Final Localized Significance Threshold Methodology, July 2008, available at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2

appropriate SCAQMD-approved methodologies (see SCAQMD, 2008). Project-specific dispersion modeling results determine whether or not a larger project generates pollution concentrations that cause or contribute to an exceedance of the applicable ambient air quality standards or the localized significance thresholds at sensitive receptor sites. The EIR should be revised with project-specific air quality modeling provided for localized air quality impacts.

4. Further, LST is a **localized** significance threshold. The current LST analysis for construction combined the entire project into one area, when the project clearly spans many city blocks. The more accurate analysis would be to perform the LST on each project component. The current analysis dilutes the emissions across multiple parcels, when in reality, the construction is more localized for each project component and the corresponding sensitive receptors. For example, one of the most construction intensive project components is Development Parcel A. The actual acreage of Development Parcel A is approximately 1.25 acres, which includes the construction of a 26 story hotel (348,500 square feet). The maximum daily construction emissions for the project were reported as 58, 48, 9, and 3 lbs/day for NOx, CO, PM10, and PM2.5, respectively (see EIR Table IV.B-5, page IV.B-35). The LST thresholds for a 1 acre site at 25 meters (Hollywood High School) in Central LA (SRA 1) are 75, 680, 5, and 3 lbs/day for NOx, CO, PM10, and PM2.5, respectively (see SCAQMD 2008). This means the proposed project is significant for both PM10 and PM2.5 for LST, when done correctly, and appropriate mitigation is required.

THE EIR'S MITIGATION MEASURES ARE INADEQUATE.

5. The mitigation measures in the EIR are inadequate. The DEIR concludes that emissions of NOx from project construction are significant. The DEIR states in Mitigation Measure B-5: "Off-road diesel-powered equipment that will be used an aggregate of 40 or more hours during any portion of the construction activities associated with grading/excavation/export phase shall meet the Tier 3 standards." EIRs prepared by the South Coast Air Quality Management District (SCAQMD), the air district with jurisdiction over southern California, has determined that mitigation measures for significant construction emissions are feasible using Tier 4 equipment. For a recent project, the SCAQMD required the following mitigation measure:
    a. "A-7: For off-road construction equipment rated greater than 50 hp, the project proponent shall use equipment that meets Tier 4 off-road emission standards at a minimum. Any emissions control device used by the Contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. The project proponent shall provide documentation in the Construction Management Program or associated subsequent status reports as information becomes available that equipment rated greater than 50 hp equipped with Tier 4 engines are not available."[2]

[2] See page 4-37 of the Final EIR for the Tesoro Los Angeles Refinery Integration and Compliance Project, SCH No. 2014091020, Certified by the SCAQMD in May 2017. Available at: http://www.aqmd.gov/home/library/documents-support-material/lead-agency-permit-projects.

There are some exemptions to the above mitigation measure including equipment unavailability and when equipment is used for fewer than 10 calendar days. See page 4-37 of the Final EIR for the Tesoro Los Angeles Refinery Integration and Compliance Project, SCH No. 2014091020, Certified by the SCAQMD in May 2017. Available at: http://www.aqmd.gov/home/library/documents-support-material/lead-agency-permit-projects. Tier 4 construction equipment must be required when it is available and subject to the same exemptions identified by the SCAQMD. Therefore, mitigation for significant construction impacts must include the use of Tier 4 engines which result in a 90 percent reduction in NOx and PM emissions.[3]

The article points out an approximate 90% reduction in NOx and PM, which is backed by the actual standards. NMHC+NOX goes from ~4.7 g/kwh to ~0.6 g/kwh and PM goes from 0.2 g/kwh to 0.02 g/kwh.

6. Mitigation measure B-5 for air emissions must not be limited to the grading/excavation/export phase. Mitigation that requires the use of Tier 4 construction equipment should apply to all phases of construction activity, as heavy equipment (e.g. cranes, cement and mortar mixers, plate compactors) would still be expected to be used in the building construction phase which is expected to last close to three years (see Appendix C, CalEEMod output files.). As discussed in previous comments regarding the project construction emissions, construction emissions have been underestimated. When these emission calculations are corrected, the project emissions are significant for other phases. The mitigation measures are also required to mitigate cumulative air emissions, as discussed below.

THE CUMULATIVE AIR QUALITY IMPACT ANALYSIS IS INADEQUATE

7. The DEIR indicates that it is using a list approach to analyzing cumulative impacts. CEQA requires analysis of "past, present and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the (lead) agency." (CEQA Guidelines 15130(b)(1)). While there is an extensive list of cumulative projects in the EIR (Table III-1), the information is not used to evaluate cumulative air quality impacts.

8. Air Quality Cumulative Analysis, EIR pages IV.B-53 through IV.B-54. The cumulative air quality analysis is wholly inadequate as presented. The proposed project and a number of cumulative projects, adjacent to the proposed project, may be under construction at the same time. The impacts associated with a number of other cumulative projects in the Hollywood area must be disclosed to the public and included in the cumulative air quality analysis. Construction activities associated with these projects directly impact the same area and the cumulative impacts must be evaluated, instead of the cursory review provided in the EIR.

[3] https://www.dieselnet.com/standards/us/nonroad.php

9. The potential cumulative air quality impacts during the construction phases are shown in Table 1. The cumulative construction emissions of the Crossroads Hollywood and other nearby project in the vicinity are included in Table 1, based on the available CEQA documents for these projects. As shown in Table 1, the cumulative air quality impacts during construction activities would be significant for VOC, NOx and CO (note that references for these projects are provided at the end of this letter). As discussed above, adequate mitigation measures must be developed for these cumulative air quality impacts including the use of Tier IV construction emissions, the use of low VOC coatings, and limiting construction activities to reduce construction emissions.

TABLE 1

Cumulative Construction Emissions
(lbs/day)

No.	Project	VOC	NOx	CO	SOx	PM10	PM2.5
*	Crossroads Hollywood	61	240	173	1	20	9
1	Coronel Apartment[a]	12.5	32.1	25	<.01	3	2
2	SunWest[b]	33	61	69	<.01	6	5
3	6200 West Sunset Boulevard[c]	16	90	45	<.01	7	3
4	1375 St. Andrews Apartments[d]	15.1	30.5	30.3	0.1	4	1.9
5	Edinburgh Avenue SLS[e]	5	21	18	<.01	1.9	1.4
6	Hollywood & Gower [f]	22	91	50	<.01	11	3
7	Sunset & Gordon[g]	46	87	70	0.6	7.2	5.2
8	6901 Santa Monica Blvd[h]	7	98	70	<.01	8	4
9	7500 Sunset Blvd[i]	58	96	76	<.01	7	3
Total Emissions		275.6	846.6	626.3	1.7	75.1	37.5
SCAQMD Significance Thresholds		75	100	550	150	150	55
Significant?		Yes	Yes	Yes	No	No	No

(a) COLA, 2013;
(b) COLA, 2016
(c) COLA, 2018
(d) COLA, 2018a
(e) COLA, 2018b
(f) COLA, 2018c
(g) COLA, 2017
(h) COLA, 2017a
(i) COLA, 2016a

10. The potential cumulative operational air quality impacts are shown in Table 1. The cumulative operational emissions of the Crossroads Hollywood and other nearby project in the vicinity are included in Table 2, based on the available CEQA documents for these projects. As shown in Table 2, the cumulative operational air quality impacts would be significant for VOC, NOx and CO (note that references for these projects are provided at the end of this letter). Adequate mitigation measures must be developed for these cumulative air quality impacts as well.

TABLE 2

Cumulative Operational Emissions
(lbs/day)

No.	Project	VOC	NOx	CO	SOx	PM_{10}	PM2.5
*	Crossroads Hollywood	101	96	487	1	61	18
1	Coronel Apartment[a]	1.7	2.8	12	0	1.7	0.2
2	SunWest[b]	18	15	82	0	13	4
3	6200 West Sunset Boulevard[c]	9	11	44	0	5	1
4	1375 St. Andrews Apartments[d]	7	7.9	32.9	0.1	4.6	1.4
5	Edinburgh Avenue SLS[e]	0	1	3	0	0.6	0.2
6	Hollywood & Gower[f]	7	9	36	0	4	1
7	Sunset & Gordon[g]	21.7	43.9	170.9	0.2	14.1	4.7
8	6901 Santa Monica Blvd[h]	8	11	60	0	9	3
9	7500 Sunset Blvd[i]	18	20	85	0	9	3
Total Emissions		**191.4**	**217.6**	**1012.8**	**1.3**	**122**	**36.5**
SCAQMD Significance Thresholds		**55**	**55**	**550**	**150**	**150**	**55**
Significant?		**Yes**	**Yes**	**Yes**	**No**	**No**	**No**

(a) COLA, 2013
(b) COLA, 2016
(c) COLA, 2018
(d) COLA, 2018a
(e) COLA, 2018b
(f) COLA, 2018c
(g) COLA, 2017
(h) COLA, 2017a
(i) COLA, 2016a

HEALTH RISK ANALYSIS IS INADEQUATE

11. The accepted methodology for determining health risk is established by the Office of Environmental Health Hazards Assessment (OEHHA) and was adopted in 2015. The guidelines were outlined in the *Air Toxics Hot Spots Program Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments* (OEHHA, 2015). The OEHHA guidelines explicitly state that the methodology only fails for projects that are shorter than 2 months, and is acceptable and accurate for any projects that last longer than 2 months (Section 8.2.10 of the OEHHA guidance). Since the construction of the proposed project will last longer than 2 months, the methodology should be used to determine health risk associated with exposure to DPM during both the construction and operational phases of the project.

12. The analysis in the DEIR lacks a health risk assessment (HRA) for diesel emissions generated during construction. Page IV.B-35 identified diesel particulate matter as a

TAC but no health risk assessment (HRA) has been prepared for TAC emissions. A significance threshold for TAC emissions is provided on pages IV.B-30 and IV.B.31, yet no analysis was provided of the TAC emission impacts from the proposed project. The use of construction equipment would occur over a 4.5 year period and expose residents to diesel particulate matter (DPM), a toxic air contaminant (TAC) regulated by the state of California. No analysis is provided in the DEIR of the potential health effects of DPM, rather the impacts are dismissed as being temporary with no further analysis. The DPM emissions from construction activities at the Proposed Project and related projects must be analyzed in the DEIR, especially since DPM is a TAC. In addition, the cumulative impacts from other projects also must be evaluated. There are smaller projects within the City of Los Angeles that present construction HRA, therefore, a larger project such as the proposed project should also present the health risks associated with construction activities. The revised OEHHA guidelines are accurate for determining health risk for projects as short as 2 months. This project will span 4 years, which is more than enough time to generate real, chronic, health problems from diesel equipment at the adjacent sensitive receptors, including Hollywood High School, especially since children are up to 10 times more sensitive to pollutants.

CONCLUSION

In conclusion, there are a number of deficiencies in the air quality analysis in the EIR including the fact that construction emissions have been underestimated, the LST analysis is incorrect, mitigation measures provided in the EIR are inadequate, the cumulative air quality impact analysis is inadequate, and the health risk analysis is inadequate. The EIR must be revised and recirculated or a subsequent EIR must be prepared and circulated to the public to address the identified problems.