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**Greater Griffith Park
Neighborhood Council**
*Your Neighborhood. Your Voice.
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November 19, 2008

Department of City Planning
200 North Spring Street
Los Angeles, California 90012

Attention: Jimmy C. Liao, City Planner/EIR Unit Head
Srimal Hewawitharana, Project Coordinator

4900 Hollywood Boulevard
ENV-2008-524-EAF

Dear Sirs:

We give you herewith the comments of the Greater Griffith Park Neighborhood Council with regard to the scope and content of the Environmental Impact Report to be prepared for this project. This letter is so limited and does not extend to our comments on the project.

We appreciate Mr. Liao's willingness to accept these comments after the date set for public comments generally. Our need for this extra time arises from the cycle of meetings of our committee principally responsible for matters of this type and the board of directors of our neighborhood council.

I. Request for Notices of all Further Matters.

This project, while within the boundaries of our adjoining neighborhood council, East Hollywood, is on Hollywood Boulevard, which is a shared street between our two areas of responsibility. Moreover, the size of this project will have very significant consequences for our neighborhood council area.

We did not receive notice of your meeting of October 28 even though we assume notice was given to resident stakeholders of our area as required by the ordinance.

We specifically request that all further notices of meetings, hearings and the like in respect of this matter be given to us at the address shown above.

We ask that you forward this request for notice to all other members of the Planning Department who may be involved in giving notices for this project.

Naturally, we also request that we receive at the time of issuance all documents such as the Draft Environmental Impact Report in hard copy form.

II. General Comments on the Special Analysis Required by this Project.

This proposed project would be the largest project in our area and for miles around. The height of the larger structure, 18 stories, would be significantly taller than any existing building on Hollywood Boulevard from its beginning to its end. It would also be taller than any existing building on Sunset Boulevard from its beginning downtown to Vine Street. On the north-south axis, both buildings would dwarf all buildings from Griffith Park south, perhaps to the sea.

As such, the project would require, as the notice points out, dramatic deviations from the community plan, the specific plan and the municipal code generally. Therefore, we believe this project requires special consideration of the effects it will have on the community and its residents and property owners as well as workers and commuters.

Moreover, we ask the Planning Department to look at this project as part of an overall plan for the City and our area. For example, your analysis and the EIR should look at the consequence of the project on development nearer the Red Line Stations both at Vermont and Sunset and at Hollywood and Western.

We understand that redevelopment of the Barnsdall Center (on the western side of Vermont between Hollywood and Maubert) is under consideration. Such a development would involve mixed use with very substantial residential space within one short block of a Red Line Station. How would this project affect that one, and which project should be favored purely from a planning viewpoint? Would a project at Barnsdall Center contradict this developer's assertion that the mass and height of this proposed project are required by the needs of the community?

There are other potential projects likely to be more consistent with the general plan, such as at the northeastern corner of Vermont and Hollywood. Moreover, given the current reorganization of the banking industry, it seems likely that property on the east side of Vermont north of Maubert may become available for major redevelopment, again more closely tied to the Metro line and more centrally located for the hospital-related long term stay use of the proposed hotel.

All these other potential projects should be included in the analysis of the environmental impact of this proposed project.

The granting of the requested deviations from the general and specific plans would result in a very substantial increase in the value of this property. It seems obvious that as a consequence of this project, the value of other properties whose views would be affected, whose light would be reduced, whose general livability would be diminished would be reduced. We think, although perhaps somewhat novel, the EIR ought to consider what compensation the developer of this property would be required to pay to the other property owners whose property values would be diminished. Thus, we think the draft EIR ought to do an analysis of the scope of the diminution in value of all property likely to be adversely affected by the proposed project. We think it is likely the adverse effects will extend to the hillside properties as well as those more immediate to the site.

III. Specific Comments to the Normally Required Analysis.

A. Aesthetics.

This is a critical issue as the views from Barnsdall, a world renowned site visited by most culturally informed tourists to our city, will be adversely affected. Moreover, the views of Hollyhock House from various parts of the city will be adversely affected. Similarly, the vistas from Griffith Park, now under consideration for historic cultural monument status, should be considered under this rubric.

Normally, when height is an issue we like to have story poles installed so all our stakeholders can be aware of the consequence of the over-height construction.

We are advised that although the height proposed is very great it is technologically feasible to construct story poles safely as is required in other cities. We believe it is very important for the community to grasp the height and bulk of the proposed structures, and that to do so it is necessary that such poles be constructed and that tape or the like tie the tops of the poles together to give an outline of the proposed structures.

An alternative would be the use of large tethered balloons (similar to World War II barrage balloons which were blimp shaped about 60 feet long and 24 feet in diameter) to mark the buildings' corners.

In addition, we need to have renderings of the buildings other than those heretofore offered by the developer (which are designed to mask the true height and to avoid showing the effect of the structures on the views). We need renderings and three-dimensional computer images from the street level and from essentially 360 degrees. This should be required by your department, and the draft EIR should be prepared with the effects shown by those renderings in mind.

B. Cultural Resources.

Again, this proposed project will have an adverse effect upon the historical cultural monuments that are on Barnsdall. What is your department doing to coordinate review with the Cultural Heritage Commission, which has review authority over projects which while not part of a designated monument have an adverse impact on such a monument?

C. Land Use Planning.

We assume that the portion of the draft EIR relating to this topic will consider both the existing Hollywood Community Plan and the proposed revised plan when it is revealed. Moreover, we would expect that the EIR, in whatever form, will address the final community plan when adopted. We also assume that you and your co-workers on this project are closely working with Mary Richardson of the Hollywood Community Plan team and with Craig Weber regarding the SNAP. Their comments to your scoping request should be solicited and carefully considered. Their presence at the scoping meeting would have been reassuring.

D. Population and Housing.

We hope the draft EIR will address issues such as the projected loss of housing from the proposed demolitions. That is, we ask that there be a full discussion of the number of units to be lost, the rents for each unit, a comparison of the size of current units with proposed units, a comparison of the cost to rent currently available units and the cost of purchasing and maintaining a condominium unit of comparable size. There should also be a sociological discussion of the effect on the community of the change in this housing stock. We assume that you will require an analysis of how this proposed project will comply with the housing element of the general plan.

There should also be an historic and cultural analysis of the existing structures, which are proposed to be razed given the fact some of these buildings are among the oldest in the neighborhood.

E. Transportation/Circulation.

As raised by a number of stakeholders at the scoping meeting, we believe it essential that the analysis of the effect of this project on vehicular traffic be extended from what might normally be required in light of the site's position on a major east-west highway and on a significant north-south road of access from the south to Franklin and Los Feliz and beyond to Interstate 5 and the cities to the east.

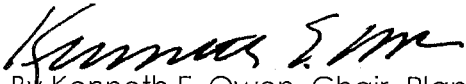
Also, we believe there should be empirical evidence produced to show that residents of the condominiums and the hotel would be likely to use public

transportation. We think the distance from a Red Line makes it unclear that residents will view that as a natural mode of transportation.

We appreciate your careful consideration of our comments.

Very truly yours,

Philip Gasteier, President

A handwritten signature in black ink, appearing to read "Kenneth E. Owen".

By Kenneth E. Owen, Chair, Planning, Zoning and Historic Preservation
Committee

Cc: The Hon. Eric Garcetti
East Hollywood Neighborhood Council
S. Gail Goldberg
Ken Bernstein
Mary Richardson
Craig Weber