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Via Electronic Mail

March 4, 2026

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

**Re: 6000 Hollywood Boulevard Mixed Use Housing Development Project
– ENV-2022-668-EIR-1A; VTT-83987-2A**

Dear Honorable Councilmembers,

On behalf of 6000 Hollywood Boulevard Associates, LLC (“Applicant”), we submit this letter in support of the Case No. VTT-83987-VHCA (the “Project”), and ENV-2022-668-EIR, the Environmental Impact Report (“EIR”) for the Project (together, the “Project approvals”). Applicant understands that on December 23, 2025, the Coalition for Responsible Equitable Economic Development Los Angeles (“CREED” or “Appellant”) submitted appeals requesting that the City Council overturn the Vesting Tentative Tract Map (“VTTM”) approval and the California Environmental Quality Act (“CEQA”) EIR certification for the proposed mixed-use housing development Project. Applicant submits this letter to supplement the January 27, 2025 Eyestone Memorandum responding to Appellant’s justification.

The City Council should deny the appeals and affirm the Project approvals. The proposed Project provides the opportunity to transform a portion of Hollywood Boulevard while addressing important community needs. Mainly, the Project provides housing, job opportunities, and publicly accessible outdoor space all within walking distance to major transit. The Advisory Agency and Zoning Administrator made appropriate findings in approving the Project and certifying the Project’s EIR. Further, the City carefully studied potential impacts from the proposed Project and considered public comments—including those provided by Appellant—submitted during the Draft EIR (“DEIR”) comment period and during the joint hearing process, before coming to its decision. The City Planning Commission agreed with this decision making and affirmed the prior decision. As the record contains no evidence of a specific adverse impact upon public health or safety, the City Council should also affirm the Project approvals and deny CREED’s appeals.

I. PROJECT BACKGROUND

Following a July 16, 2025 joint hearing by the City's Advisory Agency and Zoning Administrator, the Advisory Agency approved VTTM No. 83987 for the merger and re-subdivision of an approximately 3.7 acre site into one ground lot with nine airspace lots and a Haul Route for export of up to 252,000 cubic yards of soil, on September 2, 2025. (September 2, 2025 Letter of Determination, the "VTTM LOD.")

On the same date, the City's Zoning Administrator certified and adopted the Project EIR's findings, statement of overriding considerations, and Mitigation Monitoring Program. In connection with this act, the Zoning Administrator approved a Site Plan Review, Density Bonus Compliance Review, and Conditional Use Permit. (September 2, 2025 Zoning Administrator Letter of Determination, the "ZA LOD".) Together these entitlements would allow for development of a proposed mixed-use housing development project comprised of 350 residential units (of which 44 units will be reserved for Very Low Income households), 136,000 sf of office uses, 18,004 sf of retail uses, and 4,038 sf of restaurant uses.

On September 11, 2025, CREED submitted an appeal of the City's approvals as described in the ZA LOD and VTTM LOD. Appellant alleges that the City failed to comply with "CEQA and land use laws." (CREED Appeal Letter, pg. 2.) Following the appeal, the City Planning Commission held a November 6, 2025 hearing and issued a Letter of Determination denying the appeal on December 17, 2025.

Appellant is taking one more swing with its appeals to City Council. These appeals simply raise the same meritless arguments that were previously raised before the Advisory Agency, Zoning Administrator, and City Planning Commission. As with their prior actions, CREED's appeals remain baseless and their arguments have already been addressed.

As explained in the Eyestone Memorandum dated January 27, 2025, the appeals merely regurgitate the comments that Appellant provided during prior comment periods and hearings. The City provided specific responses to Appellant's DEIR comments in the Project's Final EIR ("FEIR") and the record includes responses to Appellant's July 15, 2025 comments from the City's CEQA consultant (the "August Eyestone Response") which were included in the record as part of the Advisory Agency and Zoning Administrator's decision making process. The appeals present no new information or replies to the City's prior responses.

As a result, Appellant fails to provide any basis to alter the City's conclusions or analysis that was set forth in the Project's EIR. CREED's appeal presents no new information that would overturn the City's findings with respect to the Project's entitlements including the VTTM LOD. Accordingly, there is no rational basis for this Council to overturn the Project's approvals. Applicant respectfully requests that the City Council affirm the Project's approvals.

II. The City's Environmental Impact Report complies with CEQA

As its basis for the CEQA appeal, Appellant refers to its prior communications to restate claims that the "FEIR's conclusions are not supported by substantial evidence, and evidence in the record demonstrates that the Project may result in significant impacts to geotechnical, hazardous materials, air quality, health risk, energy, noise and cumulative impacts." (Appeal Letter, pgs. 3-4.) Appellant then regurgitates prior claims regarding the quality of the Project's voluntarily-provided health risk assessment ("HRA"), parking, noise, excavation depth, and hazardous materials. Put simply, the City has already examined and addressed these claims. The EIR remains sufficient.

As previously noted, the City has responded to the above issues, as described in the Appellant's July 15, 2025 comment letter. With respect to the HRA, as explained in the August Eyestone Response, the City's selected methodology, which was selected based on expert opinion, is supported by substantial evidence. Further, the Project's cumulative air quality and health risks analyses were sufficient, as the analysis was consistent with the South Coast Air Quality Management District's White Paper for preparing cumulative analysis. It is the City, as the Lead Agency, which has the discretion to select the appropriate thresholds and methodology for evaluating a Project's potential impacts to air quality and health risk. With respect to parking, unlike Appellant's description of hypothetical scenarios, the EIR studied air quality and greenhouse gas emission impacts from the Project, including its proposed parking count. For noise, Appellant presents no evidence that would undermine the City's use of its existing noise standards to measure ambient noise levels.

With respect to the proposed excavation depth and hazardous materials, the FEIR addresses increased excavation depth. In its analysis, the FEIR concludes that the additional eight feet of excavation does not result in a new or substantially more severe impact than those previously identified in the DEIR. (FEIR, pg. 8-14.) As it relates to hazardous materials, the August Eyestone Response notes multiple issues with Appellant's reasoning and reaffirms that appropriate testing and mitigation have been conducted and implemented. (See August Eyestone Response, Response to Comment No. 4.)

CREED also inaccurately contends that the EIR should have been recirculated for additional public review. Recirculation is not required where the new information added to the EIR merely clarifies, amplifies, or makes insignificant modifications in an adequate EIR. (CEQA Guidelines § 15088.5(b); *Laurel Heights Improvement Assn. v. Regents of University of California*, (1993) 6 Cal.4th 1112, 1130.) Here, the law is clear that recirculation is not required. The changes made to the analysis would not result in any new significant impacts; no impacts would be more severe than previously disclosed in the DEIR; no feasible alternatives or mitigation measures were rejected by the applicant; and the EIR satisfied the requirements of CEQA.

Finally, in their VTTM appeal, CREED makes inapposite references to CEQA Guidelines 15162 and 15164 as purported evidence of a CEQA violation. (CREED VTTM Appeal, pgs. 6-7.) To

be clear, the City has not relied on CEQA's subsequent review standards to approve the Project's EIR. The City's reference to subsequent CEQA review in the VTTM LOD was simply to note that the Project's certified EIR assessed potential impacts to the Project and the VTTM. It states that based on evidence in the record, no additional analysis was required for the City Planning Commission's affirmation of the Project's entitlements and denial of CREED's prior appeal. In other words, CREED's arguments relating to CEQA Guidelines 15162 and 15164 are red herrings.

III. The City Council Should Affirm the Advisory Agency's Findings

As demonstrated in the FEIR and the August Eyestone Response, none of the comments made in the appeals, CREED's prior communications, or comments at Project hearings alter the conclusions or analysis that were set forth in the EIR. Appellant relies on these same comments as justification for its VTTM Appeal. Appellant argues that the City cannot make the appropriate VTTM findings because of purported risks associated with the Project – the Project would allegedly have significant environmental impacts that limit the City's ability to approve the VTTM. These purported risks and impacts are based on the same meritless claims that Appellant makes in reference to the Project's EIR. As described above, Appellant's comments were considered and addressed as part of the City's entitlement approvals. The Project's record establishes that the EIR's conclusions are based on sound methodology and substantial evidence. The City appropriately reviewed the potential impacts of the Project, including Appellant's claims relating to air quality, geotechnical, health risk, hazardous materials, and noise.

The record establishes that the Project will not result in substantial environmental damage and the subdivision's design and type of improvements will not cause serious public health problems. Instead, the record makes clear that the City has already studied potential impacts for air quality, health risks, greenhouse gases, energy, noise, and hazardous materials. Based on that analysis, the City only found significant impacts relating to construction noise, on-site construction vibration, and off-site vibration. (*See* DEIR, Table I-1.) The Project creates no other significant impact, and the significant noise impacts are not a basis to deny the VTTM pursuant to section 66474 of the Government Code.

In addition, the Project qualifies as a housing development project under the Housing Accountability Act. With the use of state density bonus law, the Project fully complies with applicable objective development standards. As a result, the only basis to deny the Project would be if the CPC finds a specific, adverse impact on public health or safety where no feasible method of mitigation may mitigate or avoid the impact. (Gov. Code 65589.5.)

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Planning and Land Use Management Committee
March 4, 2026
Page 5

Here, Appellant provides no evidence of a specific adverse impact on public health or safety. Accordingly, Appellant provides no basis to overturn the City's prior findings. As a result, Applicant respectfully requests that the City Council affirm the Project's prior approvals and deny the appeals.

Sincerely,

/s/ *Spencer B. Kallick*

Spencer B. Kallick

SBK