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March 4, 2026

Los Angeles City Council
c/o Office of the City Clerk
City Hall, Room 395
Los Angeles, California 90012

Attention: PLUM Committee

Dear Honorable Members:

**APPEAL RESPONSES FOR THE 6000 HOLLYWOOD PROJECT; CASE NO. VTT- 83987-2A;
CF 26-0076-S1**

On September 2, 2025, the Deputy Advisory Agency (DAA) conditionally approved Vesting Tentative Tract Map (VTTM) No. 83987 for the merger and re-subdivision of the approximately 3.7-acre Project Site into one ground lot and nine airspace lots; and a Haul Route for the export of up to 252,000 cubic yards of soil, in connection with the 6000 Hollywood Project (Project). On the same date, the Zoning Administrator also certified the Project's Environmental Impact Report (EIR) and approved related Case No. ZA-2022-6687-CUB-DB-SPR-VHCA for a Conditional Use to permit the sale and dispensing of a full line of alcoholic beverages for on-site consumption, in conjunction with a proposed restaurant in the C4 Zone, a Density Bonus Compliance Review, and Site Plan Review, for the demolition of all existing improvements and uses on the Project Site and the construction of a mixed-use development comprised of 350 residential units (of which 44 units will be reserved for Very Low Income households), 136,000 square feet of office uses, 18,004 square feet of retail uses, and 4,038 square feet of restaurant uses.

Both decisions were subsequently appealed by Aidan Marshall with Adams Broadwell Joseph and Cardozo on behalf of the Coalition for Responsible Equitable Economic Development Los Angeles (CREED LA), alleging that the Project would have significant health risk and soil contamination impacts and that the decision-maker did not properly certify the Project's EIR. City Planning (Planning) evaluated all of the appeal justifications and concluded that there was no merit to any of the appeal points, as the City appropriately determined the applicable thresholds and methodologies for health risk analysis, the Appellant conflated soil contamination with soil vapor contamination and the increased excavation depth would not result in any significant impact regarding either, and the City approved the Project and EIR in compliance with CEQA. At their meeting on November 6, 2025, the City Planning Commission (CPC) denied both appeals and sustained the respective decisions of the DAA and ZA.

On December 24, 2025, CREED LA filed a second-level appeal of the VTTM along with a related CEQA appeal of the Project's EIR. The second-level VTTM appeal is addressed in this report, and the CEQA appeal is addressed in a separate letter to the PLUM Committee under Council File No. 26-0076.

For the second-level VTTM appeal, the Appellant submitted primarily verbatim justifications and relies on the same arguments and information as their initial appeal to the CPC. As the City has previously responded to these appeal points, please refer to the Appeal Staff Recommendation Report for the VTTM Appeal dated November 6, 2025, included as Attachment 1 to this report.

The Appellant also incorporates, by reference, a number of previously submitted comment letters from the Appellant:

- December 23, 2024 letter during the public comment period for the Draft EIR (Draft EIR Comment Letter) – City Planning responded to the letter in the Final EIR.
- July 15, 2025 letter in response to the Final EIR (Final EIR Comment Letter) – City Planning responded to the letter in CPC Appeal Report, Exhibit C for the November 6, 2025 CPC meeting.
- November 3, 2025 letter in response to the CPC Appeal Report (November 2025 Letter) – City Planning responded to the letter in an Additional Information and Response to a Secondary Submission Memo, dated November 6, 2025, which was submitted to the CPC on the date of its meeting, and is included as Attachment 2 to this report

Conclusion

Per LAMC Section 13A.2.8.E.1, unless otherwise required by a specific process, the appellate body shall hear the matter de novo, considering the whole of the project with no deference given to the decision of the initial decision maker. The appellate body shall make its decision based on the record before the initial decision maker and any other evidence or testimony presented at or before the appellant body's hearing.

Upon careful consideration of the appeal, the Appellant has again failed to present new evidence or testimony that the VTTM should be denied, and has raised no new information to dispute the Findings of the CPC's actions on this matter. The CPC correctly made the findings necessary for approval of the VTTM consistent with CEQA, the Subdivision Map Act, and LAMC Section 17.15. Therefore, in consideration of all the facts, Planning recommends the City Council deny the appeal and sustain the decision of the City Planning Commission to approve VTTM No. 83987, and adopt the related Conditions of Approval and Findings.

Sincerely,

VINCENT P. BERTONI, AICP
Director of Planning



Erin Strellich
City Planning Associate

VPB:MZ:MN:MS:ES

Attachments:

Attachment 1: VTT-83987-1A Appeal Staff Recommendation Report

Attachment 2: City Planning Memo to CPC: Additional Information and Response to a Secondary Submission, dated November 6, 2025



DEPARTMENT OF CITY PLANNING

APPEAL RECOMMENDATION REPORT

City Planning Commission

Date: November 6, 2025
Time: After 8:30 A.M.
Place: Los Angeles City Hall
Council Chambers, 3rd Floor
200 North Spring Street, Room 340
Los Angeles, CA 90012

The meeting's telephonic number and access code number will be provided no later than 72 hours before the meeting on the meeting agenda published at <https://planning.lacity.gov/about/commissions-boards-hearings> and/or by contacting cpc@lacity.org.

Public Hearing: July 16, 2025
Appeal Status: Further Appealable to City Council
Expiration Date: December 1, 2025

Case No.: VTT-83987-1A
CEQA No.: ENV-2022-6688-EIR
Related Cases: ZA-2022-6687-CUB-DB-SPR-VHCA-1A
Council No.: 13 – Soto-Martinez
Community Plan: Hollywood
Plan Overlay: Hollywood Signage Supplemental Use District
Certified NC: Central Hollywood
Land Use: Regional Center
Commercial, High Medium
Residential
Zone (as vested): C4-1-SN, [Q]R4-1VL
Applicant: 6000 Hollywood Boulevard
Associates, LLC
Representative: Spencer B. Kallick
Allen Matkins Leck Gamble
Mallory & Natsis LLP
Appellant: CREED LA
c/o Aidan P. Marshall
Adams, Broadwell, Joseph
& Cardozo

PROJECT LOCATION: 5950-6048 West Hollywood Boulevard & 6037 West Carlton Way

PROPOSED PROJECT: Vesting Tentative Tract Map No. 83987 for the merger and re-subdivision of an approximately 3.7-acre site into one ground lot and nine airspace lots; and a Haul Route for the export of up to 252,000 cubic yards of soil.

REQUESTED ACTIONS: Appeal of the Deputy Advisory Agency's determination, dated September 2, 2025, which:

1. Pursuant to California Public Resources Code Sections 21081.6 and 21082.1(c), found, based on the independent judgement of the decision-maker, after consideration of the whole of the administrative record, the Project was assessed in the previously certified Environmental Impact Report (EIR) No. ENV-2022-6688-EIR (State Clearinghouse Number [SCH] No. 2023050659), certified on September 2, 2025, and pursuant to CEQA Guideline, Sections 15162 and 15164, no subsequent EIR, negative declaration, or addendum is required for approval of the Project; and
2. Pursuant to LAMC Sections 17.03 and 17.15, approved a Vesting Tentative Tract Map No. 83987 (stamped map, dated April 25, 2025) for the merger and re-subdivision of an approximately 3.7-acre site into one ground lot and nine airspace lots; and a Haul Route for the export of up to 252,000 cubic yards of soil.

RECOMMENDED ACTIONS:

DENY the appeal, and sustain the following actions of the Advisory Agency:

1. **Find**, based on the independent judgement of the decision-maker, after consideration of the whole of the administrative record, the Project was assessed in the previously certified EIR No. ENV-2022-6688-EIR (SCH No. 2023050659), certified on November 6, 2025, and pursuant to CEQA Guideline, Sections 15162 and 15164, no subsequent EIR, negative declaration, or addendum is required for approval of the Project; and
2. **Approve** Vesting Tentative Tract No. VTT-83987 (stamped map, dated April 25, 2025) for the merger and re-subdivision of an approximately 3.7-acre site into one ground lot and nine airspace lots; and a Haul Route for the export of up to 252,000 cubic yards of soil; and
3. **Adopt** the Advisory Agency's Conditions of Approval and Findings.

VINCENT P. BERTONI, AICP
Director of Planning



Milena Zasadzien
Principal Planner



Mindy Nguyen
Senior City Planner



Jason McCrea, City Planner
Deputy Advisory Agency



Erin Strellich
City Planning Associate
Email: erin.strellich@lacity.org
Phone: (213) 847-3626

ADVICE TO PUBLIC: **The exact time this report will be considered during the meeting is uncertain since there may be several other items on the agenda. Written communications may be mailed to the Commission Secretariat, Room 272, City Hall, 200 North Spring Street, Los Angeles, CA 90012 (Phone No. 213-978-1300). While all written communications are given to the Commission for consideration, the initial packets are sent to the week prior to the Commission's meeting date. If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendized herein, or in written correspondence on these matters delivered to this agency at or prior to the public hearing. As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability, and upon request, will provide reasonable accommodation to ensure equal access to these programs, services and activities. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request not later than three working days (72 hours) prior to the meeting by calling the Commission Secretariat at (213) 978-1300.*

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Exhibits:

- A – Appeal Application and Justification
- B – VTT-83987 September 2, 2025, Letter of Determination and Tract Map (stamp-dated April 25, 2025)
- C – Response to Comments on the Environmental Case No. ENV-2022-6688-EIR, prepared by Eyestone Environmental , August 26, 2025

Environmental Impact Report (EIR) links:

Draft EIR:

<https://planning.lacity.gov/development-services/eir/6000-hollywood-boulevard-project-1>

Final EIR:

<https://planning.lacity.gov/development-services/eir/6000-hollywood-boulevard-project-2>

APPEAL ANALYSIS

BACKGROUND

On September 2, 2025, the Deputy Advisory Agency approved Vesting Tentative Tract Map (VTTM) No. 83987 for the merger and re-subdivision of the approximately 3.7-acre Project Site into one ground lot and nine airspace lots; and a Haul Route for the export of up to 252,000 cubic yards of soil.

The VTTM approval is associated with the 6000 Hollywood Boulevard Project, which involves the demolition of all existing improvements and uses on the Project Site for the construction of a mixed-use development comprised of 350 residential units (of which 44 units will be reserved for Very Low Income households), 136,000 square feet of office uses, 18,004 square feet of retail uses, and 4,038 square feet of restaurant uses.

The VTTM approval is related to Case No. ZA-2022-6687-CUB-DB-SPR-VHCA, approved by the Zoning Administrator on September 2, 2025, which was subsequently appealed and is being heard by the City Planning Commission concurrently with the subject appeal.

APPEAL

One appeal was filed in a timely manner on September 22, 2025, by Aiden P. Marshall of Adams, Broadwell, Joseph & Cardozo, on behalf of the Coalition for Responsible Equitable Economic Development Los Angeles (CREED LA). Pursuant to LAMC Section 17.06 A.3, appeals of a Vesting Tentative Tract Map are made to the Appeal Board, which in this case is the City Planning Commission. Once the City Planning Commission renders their decision on the appeal, the decision may be further appealed to the City Council, if an appeal is filed pursuant to Section 17.06 A.4 within 10 days of the issuance of the Letter of Decision.

APPEAL POINTS AND STAFF RESPONSES

The VTTM appeal primarily references comments previously submitted by CREED LA on December 23, 2024 during the public comment period for the Draft EIR (Draft EIR Comment Letter), and in a subsequent letter submitted July 15, 2025 in response to the Final EIR (Final EIR Comment Letter). The Appellant claims that the issues raised in these comment letters remain unresolved, and that approval of the VTTM was unsupported by the record. The Appellant also claims that the Advisory Agency violated CEQA procedural mandates and is invalid as a matter of law because it incorrectly found that the Project's Environmental Impact Report (EIR) was assessed and adopted by the Zoning Administrator.

As detailed in the Final EIR Response to Comments, the City found that the issues raised in the Appellant's previously submitted letters lacked merit and credible evidence that the Project would result in new or substantially increased impacts than what was analyzed in the EIR, that there is significant new information that was not previously considered, or that any of the other criteria for recirculation of the EIR under CEQA Guidelines Section 15088.5 has been met. The environmental consultant which prepared the EIR, Eyestone Environmental, also submitted a letter dated August 26, 2025 which responds to CREED LA's Final EIR Comment Letter, and addressed the issues in detail that are now repeated in their appeal (Exhibit C - Response to Comments on the Environmental Case No. ENV-2022-6688-EIR).

Below is a summary of the appeal's main points and staff's responses, to provide clarity where necessary for purposes of assisting the Commission in their consideration of the Project and the appeal.

Appeal Point 1: The project would result in significant environmental or public health impacts, and therefore the map must be denied.

Staff Response 1

The Appellant alleges that the Subdivision Map Act requires denial of a project with significant environmental or health impacts, and that findings required to approve the VTTM cannot be made because the Project would have potentially significant geotechnical, hazardous materials, air quality, health risk, energy, noise and cumulative impacts.

Subdivision Map Act

The Appellant restates the required findings under the Subdivision Map Act and also cites to a section of the LAMC related to the ability of the City to deny a subdivision which results in dangerous health conditions, but does not demonstrate inadequacy with any of the Subdivision Map Act findings made for approval of the Project. The City approved the VTTM with all required findings, which detail that the Project would comply with all existing safety and health regulations and mitigation measures to address any potential health hazards, including those related to construction, grading, previous hazardous uses on the site, and methane potential.

Air Quality and Health Risk

The Appellant's environmental consultant contends that the Health Risk Assessment (HRA) completed as a part of the Project's environmental analysis is inadequate because it did not consider diesel particulate matter and diesel exhaust to be mutagenic compounds and based on that, age sensitivity factors were not included in the HRA methodology, leading to a perceived error in the estimated cancer risk. As discussed in detail in the Final EIR Response to Comments 5-10 through 5-17, an HRA was not required or warranted as part of the Draft EIR, but was nonetheless included in the Final EIR to respond to public comments for informational purposes. The City as the Lead Agency has the discretion to select the appropriate thresholds of significance and methodologies for evaluating a project's impacts, including potential impacts related to health risk based on substantial evidence, including the expert opinions of its EIR preparers, City staff, the South Coast Air Quality Management District and the United States Environmental Protection Agency, whose current guidance supports the methodology used to prepare the quantitative HRA included in the Final EIR. This comment does not provide substantial evidence to demonstrate that the Project's HRA was required to classify diesel exhaust as a whole to be a mutagenic compound because there are a variety of methodologies recognized by various regulatory agencies with regards to analyzing diesel exhaust. The comment also does not demonstrate that the City abused its discretion in selecting, based on expert opinion, an appropriate methodology with which to perform the quantitative HRA. In addition, the City's decision to prepare a quantitative HRA to fully evaluate and respond to comments received on the Draft EIR (and which ultimately confirmed the conclusion in the Draft EIR) did not deprive the public or decisionmakers of the analysis contained in the HRA.

Hazardous Substances

The Appellant contends that the change in the Project's proposed excavation depth from 40 feet, as analyzed in the Draft EIR, to 48 feet, as addressed in the Final EIR, would result in a new significant impact with regards to Volatile Organic Compounds (VOCs) that was not analyzed or

mitigated. However, the Final EIR fully analyzes the Project's revisions including the increased excavation. Similar to their July 15, 2025 Final EIR comment letter, the Appellant again appears to conflate soil and soil vapor contamination, as the Phase II Environmental Site Assessment (ESA) did not find VOCs in any soil sample analyzed from the ten borings conducted on the Project Site as part of the Phase II subsurface investigation. With regard to soil vapor sampling, however, tetrachloroethylene (PCE) was detected in all 11 soil vapor samples that exceeded the residential threshold and commercial screening levels, and trichloroethene (TCE) was detected in two vapor samples from one boring that also exceeded the residential threshold and commercial screening level. As described in Section IV.F of the Draft EIR, the concentrations of PCE and TCE generally decreased with depth across the Project Site. According to the Phase II ESA, the anomalies found in two specific borings, where the concentrations actually increased with depth, suggest that PCE may be coming from an off-site source to the north of the Project Site. However, although the Project increased the amount of excavation required, the increase is proposed to accommodate an improved thicker foundation which would provide greater deterrence from potential vapor intrusion. In addition, the proposed locations of residential and commercial uses remain unchanged; as such, impacts from soil vapor on the residential and commercial uses would remain unchanged as well. Nonetheless, any contaminants encountered would be removed during excavation, and while it is acknowledged that residual VOCs may be present below this depth during operation of the Project, they are likely sourced from groundwater and not from historic site operations, as noted by the Phase II ESA; this remains true with the increased excavation.

During construction, adherence to standard construction safety measures, as well as compliance with Cal/OSHA safety requirements, would serve to reduce the risk to workers and adjacent residents in the event that elevated levels of soil gases are encountered, but due to the detected presence of VOCs in soil vapor, the Draft EIR does conclude that potentially significant impacts could occur during excavation, and that mitigation is required. As such, Mitigation measure HAZ-MM-1, included in the Project's Mitigation and Monitoring Program, requires the Applicant to hire a qualified consultant to prepare a Soil Management Plan approved by the Department of Building and Safety, conduct soil monitoring during all soil disturbance, timely testing and sampling of soil samples, and other soil management measures, which will ensure that impacts related to soil contaminants within the Project Site would be reduced to a less-than-significant level. As such, the increased excavation depth was properly analyzed in both the Draft EIR and Final EIR, and there are no new significant impacts that would require additional environmental analysis.

Geotechnical, Air Quality, Noise, Energy, and Cumulative Impacts

The Appellant contends that the Project has not adequately addressed issues related to geotechnical conditions, air quality, noise, energy, and cumulative impacts that were previously raised in the Draft EIR Comment Letter and Final EIR Comment Letter, without providing any additional justification or evidence.

The Appellant previously alleged in the Draft EIR Comment Letter that the Project did not properly analyze geotechnical impacts associated with construction of a deep foundation, including impacts to the Metro B Line tunnel near the Project Site. However, as discussed in the Final EIR Response to Comments 2-3 and 5-6, the Draft EIR did include a comprehensive analysis of potential project impacts with respect to Metro subway tunnels, and although no significant impacts were identified, revisions to the Project were made to increase the distance between the B Line subway tunnel and the Project and deepen the proposed mat foundation, thus eliminating the need for a Deep Foundation method such as cast-in-drilled-hole (CIDH) piles. The revisions were reflected in Section II of the Final EIR, and as demonstrated therein, these changes do not result in a new or substantially more severe impact than those previously identified in the Draft EIR.

The Appellant previously alleged in the Draft EIR Comment Letter that the Draft EIR did not properly analyze the Project's provision of vehicle parking spaces and that such provision would result in air quality, greenhouse gas, energy, and transportation impacts. However, as discussed in the Final EIR Response to Comments, the analysis conducted was appropriate and the provision of vehicle parking on its own is not considered an inconsistency or an impact.

The Appellant previously alleged in the Draft EIR Comment Letter that the Project did not accurately establish the environmental setting in regards to the existing ambient and traffic noise, and failed to analyze vibration impacts on the Metro B Line tunnel. However, the noise and vibration analysis contained in the Draft EIR was performed in full compliance with CEQA, and all feasible mitigation measures were included. Nonetheless, the Draft EIR concluded that the Project would result in significant unavoidable impacts with regards to on- and off-site construction noise and on- and off-site construction vibration levels relative to human annoyance; however, a Statement of Overriding Considerations was adopted for the Project, which found that the Project's multiple benefits outweigh these temporary construction impacts.

The Appellant previously alleged in the Draft EIR Comment Letter that the Draft EIR fails to account for the combined impacts of the Project with other nearby construction projects, which together would impact a community already highly burdened with pollution. However, as discussed in the Final EIR Response to Comment No. 5-21, the Draft EIR follows SCAQMD's specified methodology for the cumulative analysis of air quality impacts and concluded that cumulative impacts were appropriately analyzed, and that the Project would not result in significant cumulative impacts.

As the Project's EIR adequately and appropriately analyzed the Project's environmental impacts, the Advisory Agency did not abuse its discretion in making the required findings supporting approval of the VTTM. The Appellant's comments do not demonstrate substantial evidence of any new or significant impacts that would require additional environmental analysis or recirculation of the EIR, and the appeal point should be denied.

Appeal Point 2: The Director's reliance on CEQA's subsequent review standards violates CEQA.

Staff Response 2

The Appellant asserts that the Advisory Agency could not find that the Project's FEIR had been properly assessed and certified by the Zoning Administrator, because CEQA also required the Advisory Agency to independently review and certify the FEIR in conjunction with approving Project entitlements. However, the Appellant incorrectly claims that the City's entitlement approval process resulted in premature certification of the FEIR by the Zoning Administrator before the Project's underlying entitlements were approved. As stated in the Zoning Administrator's September 2, 2025 Letter of Determination for the related case, the Zoning Administrator reviewed and considered the Project's EIR, and certified the EIR and adopted the related Findings, Statement of Overriding Considerations, and Mitigation Monitoring Program. The Zoning Administrator's approval of the related entitlements, including a Conditional Use, Density Bonus, and Site Plan Review, were made in conjunction with the certification of the EIR. Furthermore, these entitlement approvals were made by the same person who reviewed and considered the CEQA document.

The determination of the Advisory Agency regarding the VTTM was made subsequent to the Zoning Administrator's certification of the EIR. As stated in the Letter of Determination for the VTTM, CEQA and the State CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3, Sections 15000-15387) allow the City to rely on the previously certified EIR unless a Subsequent or Supplemental EIR is required. Specifically, CEQA Guidelines Sections 15162 and

15163 require preparation of a Subsequent or Supplemental EIR when an EIR has been previously certified or a negative declaration has previously been adopted and one or more of the following circumstances exist:

- 1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- 2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- 3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - A. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - B. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

None of the above changes or factors have arisen and there are no substantial changes to the Project, and it is the same as the approved project. No substantial changes have been identified to the surrounding circumstances, and no new information of substantial importance has been identified since the approval of the Project. There is no evidence of new or more severe significant impacts, and no new mitigation measures are required for the project.

Accordingly, there is no basis for changing any of the impact conclusions referenced in the certified EIR's CEQA Findings. Similarly, there is no basis for changing any of the mitigation measures referenced in the certified EIR's CEQA Findings, all of which have been implemented as part of the conditions of approval. There is no basis for finding that mitigation measures or alternatives previously rejected as infeasible are instead feasible. There is also no reason to change the determination that the overriding considerations referenced in the certified EIR's CEQA Findings, and each of them considered independently, continue to override the significant and unavoidable impacts of the Project.

Therefore, as the Project was assessed in the previously certified EIR, and pursuant to CEQA Guidelines Section 15162, no supplement or subsequent EIR or subsequent mitigated negative declaration is required, as the whole of the administrative record demonstrates that no major revisions to the EIR are necessary due to the involvement of new significant environmental effects or a substantial increase in the severity of a previously identified significant effect resulting from changes to the project, changes to circumstances, or the existence of new information. In addition, no addendum is required, as no changes or additions to the EIR are necessary pursuant to CEQA Guidelines Section 15164. Therefore, the appeal point should be denied.

Conclusion

Per LAMC Section 13A.2.8.E.1, unless otherwise required by a specific process, the appellate body shall hear the matter de novo, considering the whole of the project with no deference given to the decision of the initial decision maker. The appellate body shall make its decision based on the record before the initial decision maker and any other evidence or testimony presented at or before the appellant body's hearing.

Upon careful consideration of the appeal, the Appellant has failed to present new evidence or testimony that the certification of the EIR and the approval of the VTTM was inadequate, and has raised no new information to dispute the Findings of the Deputy Advisory Agency's actions on this matter. The Deputy Advisory Agency correctly made the findings of approval consistent with CEQA, the Subdivision Map Act, and LAMC Section 17.15. Therefore, in consideration of all the facts, Planning Staff recommends the City Planning Commission deny the appeal and sustain the decision of the Deputy Advisory Agency to approve Case No. VTT-83987, and adopt the related Conditions of Approval and Findings.



Department of City Planning

City Hall, 200 N. Spring Street, Room 272, Los Angeles, CA 90012

November 5, 2025

TO: City Planning Commission

FROM: Erin Strelch, City Planning Associate

ADDITIONAL INFORMATION AND RESPONSE TO A SECONDARY SUBMISSION FOR CASE NOS. ZA-2022-6687-CUB-DB-SPR-VHCA-1A AND VTT-83987-1A, LOCATED AT 5950-6048 WEST HOLLYWOOD BOULEVARD & 6037 WEST CARLTON WAY

Transmitted herewith is a Memorandum from Eyestone Environmental, the environmental consultant for the 6000 Hollywood Boulevard Project EIR, responding to the comments provided in the Secondary Submission submitted by Adams Broadwell Joseph & Cardozo on behalf of the Coalition for Responsible Equitable Economic Development Los Angeles (CREED LA), dated November 3, 2025. CREED LA is an Appellant of both of the above-referenced cases being considered at the City Planning Commission meeting of November 6, 2025, related to Item Nos. 8 and 9 on the meeting agenda.

The additional comments addressed therein do not include any substantial claims or evidence contrary to the information included in the EIR or the Staff Appeal Reports. As such, the comments are noted for the record and do not require any additional analysis or response.

Enclosures:

Eyestone Environmental Memorandum, dated November 5, 2025: 6000 Hollywood Boulevard Project—Response to CREED LA Comments on the Staff Report Regarding Environmental Case No. ENV-2022-6688-EIR



MEMORANDUM

TO: Erin Strelch
Department of City Planning

FROM: Eystone Environmental

SUBJECT: 6000 Hollywood Boulevard Project—Response to CREED LA Comments on the Staff Report Regarding Environmental Case No. ENV-2022-6688-EIR

DATE: November 5, 2025

In accordance with the California Environmental Quality Act (CEQA), a comprehensive Draft Environmental Impact Report (EIR) was prepared for the 6000 Hollywood Boulevard Project (Project). The Draft EIR was circulated for public review and comment from November 7, 2024 through December 23, 2024. Following public review of the Draft EIR, the City published a comprehensive Final EIR on May 29, 2025, which included responses to each comment within the five written comment letters received on the Draft EIR during the public comment period.¹

A public hearing for the Project with the Deputy Advisory Agency and Hearing Officer was held on July 16, 2025. After business hours on July 15, 2025, less than 24 hours prior to the hearing, the City received an additional letter from Adams Broadwell Joseph & Cardozo on behalf of CREED LA (the July 2025 CREED Letter). Under CEQA, a Lead Agency is not required to provide responses to comments submitted after the close of the Draft EIR comment period. Although not required, a thorough response was provided in order to ensure that the decision-makers are provided as much information as possible regarding the proposed Project. Responses to this letter referred were provided on August 26, 2025 and are referred to herein as the August Eystone Response.

On September 11, 2025, CREED appealed the Zoning Administrator's decision asserting the City failed to comply with CEQA and land use laws. Responses to CREED's appeal justification were provided on October 14, 2025 and are referred to herein as the Response to the CREED Appeal Justification. As discussed therein, the CREED Appeal Justification did not introduce any new information in support of their appeal, referring only to their

¹ Due to a noticing error, a Notice of Rescheduled Public Hearing & Availability of Final Environmental Impact Report was sent on June 1, 2025. However, as noted here, the Final EIR was available for public review beginning on May 29, 2025.



MEMORANDUM

November 5, 2025

Page 2

December 23, 2024 (December 2024 CREED Letter) comment letter submitted during the Draft EIR comment period and the July CREED Letter submitted the night before the hearing. With respect to the December 2024 CREED letter, the City provided thorough responses to all letters received during the Draft EIR comment period, including the December 2024 CREED Letter, as part of the Final EIR. The Final EIR's Response to Comments Section is available on the City's website – refer specifically to Response to Comment Nos. 5-1 through 5-62 on pages II-22 through II-100 of the Final EIR:

https://planning.lacity.gov/eir/6000_Hollywood_Boulevard_Project/feir/files/F_II.pdf

The Final EIR, August Eystone Response, and Response to the CREED Appeal justification are part of the City's administrative record and are hereby incorporated by reference.

On November 3, 2025, CREED submitted an additional letter regarding the staff report for the Project's November 6, 2025 City Planning Commission hearing (the November CREED Letter). With one exception which is discussed further below, the November CREED Letter does not raise new issues. Refer to the Final EIR, August Eystone Response, and the Response to the CREED Appeal Justification for responses to these comments. Although these comments are duplicative of CREED's earlier comments, brief additional responses are provided below.

The one new issue raised in the November CREED Letter is in the letter provided by CREED's noise consultant, Wilson Ihrig. On page 2 of Wilson Ihrig's comment letter, they assert that the Project should have used the August 2024 Construction Noise and Vibration Updates to Thresholds and Methodology (UTM) adopted on September 24, 2024. During the transition period from the prior noise and vibration thresholds to the UTM, City policy was that projects on close to publication were permitted to use the prior thresholds. Accordingly, the Draft EIR was published on November 7, 2024 and used the prior thresholds in accordance with City policy.

It should also be noted that the prior thresholds represent a far more conservative analysis. As discussed in the Draft EIR, using the prior thresholds, implementation of the Project would result in significant Project-level and cumulative impacts that cannot be feasibly mitigated with regard to on-site construction noise, off-site construction noise, on-site construction



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vibration with respect to human annoyance, and off-site vibration with respect to human annoyance. Under the UTM, for construction activities that occur between 7:00 A.M. and 7:00 P.M. Monday through Friday, and between 8:00 A.M. and 6:00 P.M. on Saturdays, the absolute construction noise threshold is 80 dBA and there is no numerical threshold related to human annoyance. Applying these thresholds to the Project, all of the Project's daytime construction noise impacts would be mitigated to a less than significant level. Only the significant and unavoidable impacts associated with the nighttime mat pour would remain. Thus, as noted above, the use of the prior thresholds presents the public and decision-makers with a more conservative analysis.

With respect to CREED's duplicative comments, it is also noted that the commenter continues to misrepresent both the findings of the Draft EIR as well as the response to their prior comments related to hazards and hazardous materials. Importantly, their comments continue to conflate regulatory thresholds for soil vapor and soil contamination itself. The Project's foundation will effectively provide a barrier for potential vapor intrusion and in accordance with Mitigation Measure HAZ-MM-1, any contaminated soil will be removed from the Project Site. With respect to the soils management plan described in Mitigation Measure HAZ-MM-1, the commenter fails to acknowledge the SCAQMD Rule 1166 is the standard operational rule that applies to the removal of contaminated soil within SCAQMD's boundaries. Lastly, the commenter continues to assert without evidence that the Project would result in significant geotechnical impacts related to the Metro B Line. The initial analysis of the Project did not identify any impacts related to surcharge on the B Line tunnels. Nevertheless, in response comments received on the Draft EIR, the design of the Project was modified to set Building B back an additional 13.5 feet from Hollywood Boulevard and the depth of excavation was increased by 8 feet to provide a mat foundation. These changes were fully analyzed in the Final EIR and do not result in new or substantially more severe impacts. The Applicant has previously coordinated with Metro, and ongoing coordination with, and ultimate signoff by, Metro is a regulatory requirement pursuant to Zoning Information File No. 1117.

Therefore, as demonstrated in the Final EIR, the August Eyestone Response, the Responses to the CREED Appeal Justification, and the above, none of the comments made in the December 2024 CREED Letter, the July 2025 CREED Letter, the CREED Appeal Justification, or the November CREED Letter alter the conclusions or analysis that was set



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forth in the EIR. Additionally, none of the comments received constitute new significant information warranting recirculation of the Draft EIR as set forth in CEQA Guidelines Section 15088.5. Specifically, none of the comments received disclose any new significant impacts or a substantial increase in the severity of an impact already identified in the EIR, nor do the comments contain significant new information that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the Project or a feasible alternative or mitigation measure that the Applicant has declined to adopt.

Since CREED has not provided any new information in support of their appeal referring only to their previous comments to which responses have been provided, no further response is warranted. The conclusion of the Final EIR, August Eyestone Response, and the Response to the CREED Appeal Justification that none of the comments received constitute new significant information warranting recirculation of the Draft EIR as set forth in CEQA Guidelines Section 15088.5 remains valid.