

**From:** LFIA President <president@lfia.org>  
**Sent time:** 06/01/2020 01:37:23 PM  
**To:** Mindy.Nguyen@lacity.org  
**Cc:** David Ryu <David.ryu@lacity.org>; Councilmember.ofarrell@lacity.org; mayor.garcetti@lacity.org  
**Subject:** Hollywood Center Project DEIR Response  
**Attachments:** LFIA\_HCP\_DEIRresponse\_2020\_06\_01.pdf

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Please see attached letter.

Thank you.

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**Amy Gustincic**

President, LFIA

Advocacy and Action for Los Feliz

[LFIA.org](http://LFIA.org)



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Mindy Nguyen  
Department of City Planning  
221 N. Figueroa Street, Suite 1350  
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June 1, 2020

Re: **Hollywood Center Project**  
**ENV-2018-2116-EIR**  
**State Clearing House No.: 2018051002**

Dear Ms. Nguyen:

LFIA, the advocacy group for all residents of Los Feliz, has serious concerns about the proposed Hollywood Center Project. While we support the revitalization and redevelopment of Hollywood, the currently proposed project has many significant flaws that need to be addressed.

This is a project with an identity crisis. Maybe it will be residential units; however, with the East Site Hotel Option maybe it will be a 220-room hotel. Is the applicant taking advantage of the city's need for residential housing to get its project approved; then it will actually build a hotel because hotel rooms are more lucrative. Which project will it actually be?

The Executive Summary ES p. 4 lists no less than eight Area of Controversy/Issues to be Resolved that were identified during the Notice of Preparation process. None of these issues have been addressed. Miraculously in spite of all the major issues raised, the DEIR identified only three Significant and Unavoidable Impacts and those were only during construction. Towers 46 stories, 35 stories and two at 11 stories with 1,287,150 square feet of developed floor area, and it will have no impact? This defies all common sense. How can such a large project have no impact?

**L. Transportation:**

The traffic study done for this project is deficient and inadequate. The DEIR fails to analyze the impact of traffic at the intersection of Franklin Avenue and Argyle Avenue. It currently takes 20 minutes to get to the Franklin Avenue on ramp to the Hollywood Freeway from Canyon Drive during rush hour. The addition of more than 1,000 residential uses plus commercial uses will clearly add a large number of vehicles to Franklin Avenue, yet this intersection was not even considered. This is a serious omission and must be addressed.

Although SB 743 states "a project's effect on automobile delay does not constitute a significant environmental impact," it does not refer to blocked streets. The additional traffic that the project will undeniably bring to Franklin Avenue, has the net result of effectively trapping residents who live north of Franklin Avenue in their neighborhoods. How will the Project mitigate the situation so that residents have ingress and egress from their neighborhoods in a timely manner?



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The Project is relying on the Transportation Demand Management (TDM) Program to address traffic issues. TDM means the Project will discourage the use of single-occupancy vehicles. Good luck with that! This is a naive dream in Los Angeles where we love our cars. Until Los Angeles has a more robust public transportation system, there are still many times when one will need a car. Given the current coronavirus pandemic, people may be reluctant to get onto crowded buses and metros. The use of ride-sharing as an alternative is not viable because numerous studies have demonstrated that ride sharing actually increases the number of cars on the road.

Furthermore, Caltrans has serious concerns about the Project and communicated them to the City. Per IV. L. Transportation p. 49-50:  
“the City received a comment letter dated April 22, 2019 from Caltrans providing recommendations for the Project’s Draft EIR traffic analysis focusing on potential traffic conflicts pertaining to direct and cumulative trips on state facilities in the Project vicinity, including off-ramp queuing and mainline merge and weaving analysis at requested locations ...” In a second letter, dated March 5, 2020, Caltrans asserted that the previously identified highway capacity issues were safety traffic concerns. The DEIR states that the City has requested additional information. Yet in spite of these letters, the DEIR dismisses them as irrelevant and included them in the appendix for informational purposes. How can the Project’s hired traffic consultant presume to know more about freeway safety than Caltrans engineers?

Due to its location at the base of the Cahuenga Pass in the Santa Monica Mountains, the site is already a choke point. Thousands of people going between the San Fernando Valley and Hollywood or Downtown use the Hollywood Freeway on a daily basis. There are no easy alternative routes. Traffic is pushed onto Laurel Canyon Boulevard. It is unconscionable to place a major project in an area that is already a choke point. This project would be much better suited to a location much further south where the land is relatively flat and there would be numerous other streets that one could take to avoid congestion around the project.

#### **V. Alternatives**

The applicant states that he has his heart set on developing the area around the Capitol Records Building; therefore, building the project in another area is not feasible. (V. 8) This is a self-imposed hardship and should not be considered a valid reason for not developing his project in another location.

#### **D. Geology and Paleontological Resources:**

The geology analysis is deficient and incomplete. The Project sits on an identified Alquist-Priolo Earthquake Fault Zone. (IV D. p. 17) The Alquist-Priolo Earthquake Fault Zone mapping was developed specifically so that cities could avoid building on or near fault lines. “The nearest significant active fault to the Project Site is the Hollywood Fault .... The



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Hollywood Fault trace shown in Figure IV.D-1 shows one trace passing east-west north off the Project Site." Figure IV.D-2 shows fault lines directly under the project as well as two nearby liquefaction zones. The DEIR notes that the very active San Andreas Fault could trigger earthquakes in Los Angeles at large. (IV.D. p. 21) Constructing a large building housing approximately 2,000 residents and commercial uses on top of an earthquake fault is not something that can casually be dismissed. Yet the DEIR declares that a rupture of the earthquake fault is Less than Significant and as such requires no mitigation. How can the Project ignore earthquake fault line mapping that was designed for public safety? How can the Project claim to have Less than Significant impact when it is sitting directly on earthquake fault lines?

During the testing process, a slope failure occurred. (Appendix G 1 p. 447) The site is on top of old alluvial deposits. Is this not a matter of concern that a similar failure will occur during construction?

A letter from Group Delta to Millennium (Appendix G1 p. 461) clearly indicates concern regarding various old mudflows that are non-conforming. Group Delta requested "To this end, it would be very helpful to our final evaluation if you could provide any additional analysis you have related to some of these alternative interpretations. Specifically, an apparent change of thickness of the "mudflow" unit across the inferred fault was identified on Cross Section M-M'... the Mud Flow Unit (Qm, 80-125ka) lies unconformably on top of the older mudflow deposits determined to be 125- >500ka+ (based on updated core interpretations for this letter). The identification of this contact was not indicated in the GDC previously submitted report (GDC, 2015a) for the East Millennium."

Appendix G1 Fault Activity Investigation documents the background data that was used to come to the conclusions in IV.D. The consultants must have been looking at actual large sheet printed documents rather than the version provided in the DEIR that were made available to the public. The legends of the online charts and graphs contain small white blocks covering many of the legends on the graphs making it difficult to guess what it might be attempting to say. If the consultants were looking at the same documents that the public received, then their analysis must have been based on speculation – or was it based on direction from the applicant? How could the applicant be allowed to submit documents that are illegible?

### **C. Cultural Resources**

Although the Project will not alter the historic Capitol Records building, it will certainly impact the view of the iconic Hollywood building. "the Capitol Records Building, long celebrated as an outstanding example of Mid-Century Modern architecture ..." (p. 58) "Both the East Building and West Building would be substantially taller than the Capitol Records Building. The juxtaposition of substantially taller buildings would alter the visual setting of the Capitol Records Building, which historically was one of the most visually



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prominent buildings in the Hollywood skyline ..." (p. 57) "The only aspect of integrity with potential for substantial adverse effects associated with the Project is setting. Because the Project would construct a 46-story East Building and up to an 11-story East Senior Building immediately south and east of the Capitol Records Building (as well as similar development on the West Site), thereby adding considerable height and mass to an area currently occupied by surface parking, the immediate surroundings of the Capitol Records Building would be altered." (p.59) By their own admission, the once prominent view of the Capitol Records Building will disappear. From the Hollywood Walk of Fame on Hollywood Blvd. and Argyle Street, the view of the Capitol Records Building would be completely obscured. The towers of the proposed project would impact the scenic vistas both of the people living in the hillsides looking toward the Capitol Records Building and the views of the people living in Hollywood looking up toward the Hollywood Hills section of the Santa Monica Mountains. That impact cannot be mitigated unless the project is scaled down significantly.

#### **H. Land Use and Planning**

The Project does not conform with land use regulations on the Project site. "However, the "D" indicates a Development Limitation, which restricts all the lots on the Project Site to a 3:1 FAR, with the exception of one lot (occupying the northwestern corner of the East Site, which comprises a portion of the Gogerty Building) to a 2:1 FAR.<sup>15</sup> The Project proposes to remove this "D" Limitation through a proposed Zone Change and Height District Change for the Project Site." (p. 10) D Limitations are put in place for a good reason. They should not be removed without careful consideration. Because the applicant bought the property in the hopes of changing the code to maximize his profit is not a good reason.

The Project is in an area designated in the City's General Plan as a Regional Center Commercial. Regional Centers already enjoy a generous 6:1 FAR, but the Project is requesting at 7:1 FAR. "The increase in FAR beyond 6:1 is allowed by the LAMC but would be subject to City findings that the Project would further the goals and intent of the Hollywood Redevelopment Plan by meeting such objectives as ..." Then it goes on to justify its request for higher density by saying "The Project would meet these objectives by providing a mixed-use, higher-density development ..." The rationale for being allowed to build denser is that they are going to build denser? How is that logical?

"Approval of the Project's requested entitlements, including the Zone and Height District Change, Conditional Use Permits, Site Plan Review and related findings and conditions to ensure compatibility with surrounding land uses would bring the Project into consistency with the Framework Element, Hollywood Community Plan, Hollywood Redevelopment Plan, and LAMC. Therefore, with the approval of the proposed entitlements, the Project and the Project with the East Site Hotel Option would be consistent with and not conflict with applicable land use plans, policies, and regulations,



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and impacts would be less than significant.” (p. 27) The applicant is requesting major changes to land use and claiming that if the city approves all of them it will be compliant. Again, how is that logical?

**N. Wastewater, Water Supply, Solid Waste**

The analysis of water and waste water is deficient. During periods of drought the City of Los Angeles is regularly put on water rationing. We have installed new appliances that conserve water. We have changed our landscaping to drought-tolerant plants or xeriscapes. At least once a year an aging water main bursts in the Hollywood Hills, flooding streets and homes and washing out hillside slopes. The additional people that the Project will bring in will all be washing dishes, taking showers, and flushing toilets. This increased usage will clearly have an impact on water availability and on our aging infrastructure. Yet the only proposal is to install water conserving appliances. Will the applicant finance the upgrading of the city’s infrastructure in the Hollywood area to prevent water main breaks and sewage overflows?

LFIA urges the City to carefully reconsider the Hollywood Center Project which will have a major impact on the surrounding neighborhoods. It should not be permitted to build on an earthquake fault, nor should it be permitted to build at a location that is a geological choke point.

Sincerely,  
Amy Gustincic

President, LFIA

cc:  
Mayor Eric Garcetti (mayor.garcetti@lacity.org)  
Councilmember Mitch O’Farrell (councilmember.ofarrell@lacity.org)  
Councilmember David Ryu (david.ryu@lacity.org)