Millennium Hollywood Center...Submitting for Administrative Record
DEIR ENV-2018-2116 EIR 2018E1002

DEIR...Millennium...2013

Letter #3...p.33 - 41...Caltrans..problems with Millennium projects
Letter #5...p.42...Metro
Letter #4...p.41...Councilmember Garcetti requested extension period for DEIR comments. He got an extension...We did NOT for Millennium Hollywood Center during CORONAVIRUS PANDEMIC
Letter #9...p.62...AMDA..problems. Before lawsuit was withdrawn when Millennium made larger contribution..
Letter #14...p.74...Hollywood Heritage...Historic Resources: Capitol Records will be blocked = Historic Cultural Monument...Compromises Historic Area, it's on National Register of Historic Places...Hollywood Sign blocked...it's an HCM
The City chose Millennium's PAD consultant's analysis instead.
*Letter #19...p.725...L.A. Conservancy...problems with projects before lawsuit was withdrawn when Millennium made larger contribution.
Letter #24...p.735...Sunset Vine Tower was unoccupied, boarded up, fenced for years due to 1994 EQ damage...a few blocks down from Millennium Vine project site...
Letter #............p.965...W Hotel problems with Millennium projects...Before law suit was withdrawn when Millennium made larger contribution...
.............p.976...W Hotel Height Limit had to be 150 feet..CONSISTENT with the AREA..WHY NOT MILLENNIUM?

DISMISSED.....
ACTIVE EARTHQUAKE....THREAT TO PUBLIC SAFETY....

Communication from Appellant/Representative
07/24/2013

http://clkrep.lacity.org/onlinedocs/2013/13-0593_misc_a_7-24-13-PDF

JMBM
Jeffer Mange's Butler & Mitchell LLP
Kevin K. McDonnell KKM@jmbm.com

"high probability that a seismic fault runs through Millennium project site"

The fault interpreted from these data reasonably projects eastward from Cahuenga Boulevard, through the Hollywood Millennium Project to a prominent scarp previously located between Argyle Street and Gower Street (Figure 2).

Page 2

Although the ability to "zoom" this map is limited, at the highest zoom available, a branch of the Hollywood fault appears to be located near, if not directly beneath the Hollywood Millennium project.

A web search of the "Hollywood fault" would have returned numerous links to the more detailed studies outlined above.

Any one of these references, and certainly their combined influence would have alerted the consultant to the inaccuracy of the other references, and the need for a detailed ground-rupture hazard assessment at the site.

Southwestern Engineering Geology
Page 3
http://clkrep.lacity.org/onlinedocs/2013/13-0593_misc_a_7-24-13-PDF

DISMISSED....
STATE MAP SHOWS ACTIVE FAULT LINE UNDER PROPOSED HOLLYWOOD SKYSCRAPER PROJECT
“It has the potential to rupture sometime in the future...the best thing to do is stay off the trace...” State Geologist Tim McCrink

NEW STATE FAULT MAPS SHOW HIGHER EARTHQUAKE RISKS IN HOLLYWOOD
The state's new map shows that the proposed Millennium Hollywood skyscraper project is within the roughly 500-foot fault zone.

State geologist John Parrish said the state's fault line goes underneath Millennium. "We feel very confident about where we drew that line, within a 50-foot accuracy back and forth. We're very confident it's there," Parrish told reporters at a downtown Los Angeles news conference.

"Surface rupture is very dangerous. In fact, it's calamitous to structures that are built across the surface trace of an active fault."

Los Angeles officials did not order trenching for any of the three projects before the City Council approved those projects.

L.A. COUNCIL OKS HOLLYWOOD SKYSCRAPERS DESPITE CONCERNS OVER QUAKE FAULT LINE http://articles.latimes.com/2013/jul/24/local/la-me-millennium-vote-20130725

"...concerns about seismic safety were raised, citing the project's proximity to the Hollywood fault.

On Saturday, the head of the California Geological Survey, John Parrish, sent a letter to Council President Herb Wesson alerting him that the skyscrapers "may fall within an earthquake fault zone." He criticized a seismic report produced by the developer that said extensive testing showed that the building site was safe and did not lie on the fault line.

Parrish said the report did not refer to his agency's map and left out other important information.

DISMISSED....
CALTRANS WARNINGS....THREAT TO PUBLIC SAFETY......

Transportation - Caltrans issues...Caltran (ignored) warning letter to Mayor Garcetti:

After reviewing the Response to Comments from the City, Caltrans sent a letter, dated February 19, 2013, commenting on the FEIR (see attachment 3).

We have not received a response from the City regarding our comments.

The Los Angeles Planning Commission approved the project on April 27, 2013.

As a commenting agency, we would like to, once again, bring to the City's attention that the project impacts will likely result in unsafe conditions due to additional traffic congestion, unsafe queuing, and difficult maneuvering.

As mentioned in our previous letters, these concerns have not been adequately addressed in the EIR summary, without the necessary traffic analysis, Caltrans cannot agree that the FEIR substantively identifies and mitigates the Project's impacts to the State highway facilities as required under CEQA.


Communication from
Appellant/Representative  07/24/2013

DISMISSED...
CALTRANS...TRAFFIC SAFETY...

The Mayor ignored Caltrans letters and warnings of the dangerous traffic and the councilmember for the Millennium projects area claimed "Caltrans is not opposed to the projects"....

Caltrans Waves a Red Flag on Millennium
http://articles.latimes.com/2013/jun/19/business/la-fi-hiltzik-20130619

JUDGE THROWS OUT HOLLYWOOD MILLENNIUM SKYSCRAPER PROJECT

"Superior Court Judge James C. Chalfant has stopped the Millennium Hollywood twin skyscrapers project in its tracks, finding that top city officials ILLEGALLY IGNORED required parts of the Environmental Impact Review process and warning that the project could dramatically worsen traffic on the Hollywood Freeway and in the surrounding neighborhood.

His ruling means the investors cannot get any building permits from the city.

THE JUDGE FOUND THAT TOP LOS ANGELES ELECTED AND APPOINTED OFFICIALS IGNORED CALTRANS WARNINGS about the dual towers' effects on traffic heading on and off the often backed-up ramps on the nearby 101 freeway.

Chalfant lectured city leaders, saying:

"The congestion of freeways in L.A. is subject to review because it's so terrible, and anything that may make it worse needs to be examined."
The issue is whether you need to follow the provisions of the responsible agency, Caltrans. And the language and scholarly work on the issue says overwhelmingly 'yes.' ...

There were many aspects Caltrans wanted you to look at, that you didn't look at."

Instead of including in its Environmental Impact Report, or EIR, the required traffic studies conducted by Caltrans, Garcetti and the City Council chose to press forward with their own freeway traffic studies.

Judge Chalfant says this was illegal.

He ruled, the city is not allowed to conduct studies on freeway traffic using its own definitions and methods.

"Freeway traffic is the responsibility of experts at Caltrans, specifically, and not of the Los Angeles Planning Dept. or any other city department."

DISMISSED......
HISTORIC RESOURCES... PRESERVATION....

The City ignored Hollywood Heritage PRESERVATION concerns and instead went with Millennium's paid consultant "analysis".

*L.A. Conservancy had PRESERVATION concerns, and a law suit, withdrawn once Millennium contributed more money to the organization... (link above)

Dear Ms. Hewawitharana:

Re: Millennium Hollywood Project, ENV-2011-675-EIR

The Board of Directors of Hollywood Heritage, its Preservation Issues Committee and its members, thank you for the opportunity to review and comment on the Millennium Hollywood Project, and the accompanying Draft Environmental Impact Report (DEIR).

For three decades Hollywood Heritage has been an advocate of the preservation and protection of Hollywood's historic resources. We support the goal of preserving what is most significant in Hollywood, while encouraging responsible new and infill development.

Our organization has nominated many of the current Historic Cultural Monuments, listed the Hollywood Boulevard Commercial and Entertainment District in the National Register of Historic Places at the national level of significance, provided technical assistance to developers and owners of significant properties, and participated in public policy discussions through the formulation of the Community Redevelopment Plan of 1986 and subsequent urban design plans, specific plans and in property entitlement discussion involving historic resources.

These efforts have resulted in the rehabilitation of significant landmarks and districts in Hollywood.

Our expertise in this area has led us to the conclusion that the Millennium Hollywood project has significant and adverse impacts on a number of Hollywood's Historic resources.

CEQA guidelines define a project as having a significant environmental impact when the project causes a substantial adverse change in significance of a historical resource as defined in State CEQA Section 15064.

The City of Los Angeles CEQA Thresholds Guide (2006, p. D.3-3) also maintains that a project would have a significant impact on historic resources if the project results in a substantial adverse change in the significance of a historic resource by construction that reduces the integrity or significance of important resources on the site or in the vicinity via alteration of the resource's immediate surroundings.

While we appreciate some of the mitigation measures designed to preserve the historic Capitol Records and Gogerty Building, we believe that the proposed project would substantively alter the context in which these buildings gained their significance by compromising the immediate surroundings.

Portions of the project are grossly out of proportion with the identified resources, thereby minimizing them and irretrievably altering their setting.

Additionally, while we appreciate the inclusion of open space, the current design significantly changes the pedestrian environment of Hollywood.

Like many previous developments, it draws pedestrians away from the street and irrevocably alters the historic street wall along Vine and Argyle.

We also find the current version of the Millennium Hollywood Draft EIR to be deficient in its assessment that the project would not cause an adverse change in significance for the Hollywood Boulevard Commercial and Entertainment Historic District.

The heart of Hollywood is listed in the National Register of Historic Places and functions as one of the City of Los Angeles' major tourist destinations and economic engines.

The Hollywood Boulevard Commercial and Entertainment Historic District is a 12 block area of the commercial core.

The district contains 103 of the most important buildings in Hollywood, listed at the national level of significance in the National Register of Historic Places.

The development pattern of the 1920s and 1930s was characterized by the construction of buildings of generally 12 stories at major intersections, flanked by one and two-story retail structures.

The District was formally designated by the National Park Service on behalf of the Secretary of the Interior in 1965.

At the time, there were over 60 contributors and approximately 40 non-contributors which all dated from the 1905-1935 period of significance.

Since its listing, the District has seen significant and positive restorations, now having the largest collection of restored historic theaters in use in the nation.

The District can count the beneficial reuse of the Broadway and Equitable Buildings, the Hollywood Professional Building, and the Nash Building, and many restorations, spurring the renaissance of Hollywood.

But the District has suffered the loss of several contributors, and has seen the addition of overly-large developments such as Hollywood and Highland, the W Hotel and Madame Tussaud's.

The current Millennium Hollywood project fails to significantly address the negative impact created by the mass and height of the proposed development in regards to the existing structures in the vicinity.

This will be the largest tower in the area.

While creating opportunities to see landmarks such as the Hollywood Sign from areas within the development, the project fails to address the fact that these new view lines will alter views that have been publicly available since the inception of these landmarks.

In the "Related Projects" section of the DEIR, which compares this project with other projects nearby, unapproved, proposed developments are used alongside existing structures, allowing the square footage increase that this project suggests to be seen as more reasonable.

However, the structures included on the comparative chart are all less than one-third the size of the proposed Millennium tower.

The only project that is as large is the proposed redevelopment of the Paramount Studios Lot. At 1,385,700 sq. ft., the Paramount Lot is a much larger property and does not have any single building of a comparative height as proposed by Millennium.

The addition of the proposed tower will overwhelm contributing properties in the district and the proposed "separation" of new and old construction is simply not an adequate mitigation measure.
Hollywood Heritages appreciates the efforts of the project's developers and will work diligently with them to ensure the preservation and protection of all of Hollywood’s historic resources.

Sincerely,

Bryan Cooper
President, Hollywood Heritage, Inc.

DISMISSED:
Organizations Opposing the Hollywood Millennium Project

Organizations Opposing the Hollywood Millennium:

Neighborhood Councils:
- Central Hollywood Neighborhood Council
- Greater Griffith Park Neighborhood Council
- Greater Wilshire Neighborhood Council
- Hollywood Studio District Neighborhood Council
- Hollywood United Neighborhood Council
- Hollywood Hills West Neighborhood Council
- North Hills West Neighborhood Council

Neighborhood Associations:
- Argyle Civic Association
- Beachwood Canyon Neighborhood Assn
- Bel Air Knolls Property
- Bel Air Ridge Association
- Bel Air Skycrest Property
- Benedict Canyon Association
- Benedict Hills Homeowners Asso.
- Brentwood Residents Coalition
- Cahuenga Pass Property Owners
- Canyon Back Alliance
- Creola Neighborhood
- Franklin Ave. / Med. Blvd. West
- Franklin Hills Residents
- Greater Wilshire Neighborhood Council – Land Use Committee
- Hancock Park Homeowners Association
- Highlands Owners Association
- Hollywood Dell Civic Association
- Hollywood Heights Association
- Hollywoodland Homeowners Association
- Holmby Hills Homeowners
- Kagel Canyon Civic Assn.
- Lake Hollywood Homeowners
- Laurel Canyon Association
- Lookout Mountain Alliance
- Los Feliz Improvement Association
- Mt. Olympus Property Owners
- Mt. Washington Homeowners Alliance
- North Beverly – Franklin Canyon Home owners Association
- Nichols Canyon Association
- Oak Forest Canyon Association
- Oak Homeowners Assn.
- Outpost Estates Homeowners
- Pacific Palisades Residents Assn.
- Roscomare Valley Association
- Shadow Hills Property Owners
- Sherman Oaks Homeowners
- Studio City Residents Association
- Sunset Hills HOA
- Tarzana Property Owners
- Temple-Flynn Association
- Upper Mandeville Canyon
- Whitley Heights Civic Association

The Del Rey Residents Association joins the other neighborhood associations in opposing this project.
Bad planning in one corner of the city is bad planning for all

DISMISSED...
Research, Proof, State Geologist Confirmations of the Active EQ Fault.

Why Were State Geologist Active EQ Confirmations and Danger Warnings Ignored?.....
Millennium Hollywood Project Led Lobbyist Spending at L.A. City Hall........

Hollywood Patch Dec 12, 2013

LA Times – Nov 6, 2014 – California geologist says quake fault lies beneath Hollywood project
Park LaBrea News/Beverly Press Nov 13, 2014 State’s Map Shows Active Fault Under Millennium
LA Times July 7, 2015 Hollywood skyscraper critics question quake risk for project
Wall Street Journal May 26, 2015 Developers Worry California Ruling Could Dent Building
LA Weekly April 30, 2015 Judge Throws Out Hollywood Millennium Skyscraper Project
LA Times April 30, 2015 Judge Halts Millennium Skyscraper Project

Finance and Commerce January 15, 2015 Hollywood Projects Stalled as David Beats Goliath
Park LaBrea News/Beverly Press Nov 13, 2014 State’s Map Shows Active Fault Under Millennium


State Map Puts Quake Fault Beneath Proposed Millennium Hollywood Skyscraper Nov 7, 2014
Los Angeles Magazine, The Fault in Our Skyscrapers Nov 6, 2014

Planned Hollywood high-rise would sit atop earthquake fault, state says – Yahoo News 11:6-14

Massive Hollywood project sits atop quake fault, California says

Active fault under site of proposed Hollywood skyscrapers, state says | 89.3 KPCC

L.A. Times – May 6, 2014 – New L.A. Area Quake Map Shows Fault Lines Under Schools, Hotels, Homes
LA Weekly – Jan 16, 2014 Hollywood Fault Pits Builders and City Hall Against the Community
Huffington Post – Jan 9, 2014 Millennium Hollywood Project in Jeopardy After Map Reveals Earthquake Faults

The Front Page Online Aug 21, 2013 – Times Minimizes Millennium Scandal – Grand Jury Probe Needed

LA Times Aug 14, 2013 – Tower project exposes gaps in L.A.’s oversight
LA Times August 9, 2013 – Hollywood’s Blvd200 project escaped review despite fault threat
KABC AM Radio – August 8, 2013 Doug McIntyre Interviews Robert Silverstein
KTTV Opponents August 7, 2013 – Demand an Independent Seismic Study
KCOP Fox 11 August 7, 2013 – Opponents Demand an Independent Seismic Study
CBS August 7, 2013 – Earthquake Fears May Put Hollywood Skyscraper Project on Shaky Ground
Reuters August 8, 2013 – Foes of Hollywood Skyscraper Plan Allege Earthquake Coverup
KPCC 89.3 August 7, 2013 – Millennium Towers: City ‘concealed’ Hollywood Fault Details, Opponents Charge
Miami Herald August 2, 2013 – New Hollywood Tower Project May Be Over Fault Line
KTTV Fox News – August 2, 2013 Coverage of Fault Line Issue
LA Times August 1, 2013 – Skyscraper site in Hollywood may sit on active fault, State says
LA Times 7-26-2013 – Millennium Hollywood: First Check the Fault
LA Times 11 p.m. 7-24, 2013 L.A. Council OKs Skyscrapers Despite Concerns Over Quake Fault Line
MyFoxLA – Hollywood Skyscraper Millennium Project: Building on Shaky Ground
LA Weekly – Uh Oh! Are the Millennium Skyscrapers Atop the Hollywood Fault?
NEC Southern California – Hollywood Millennium Project Causing Controversy
TalkRadio 790 KABC Millennium Towers Project Draws State Scrutiny
HollywoodPatch Millennium Hollywood Project May Fall on Active Earthquake Zone, Opponents Say
CBS Los Angeles July 22 Environmental Attorney Warns of Millennium Project Quake Risk
CityWatch July 19, 2013 The Millennium Manhattenization of Hollywood
KPPC on Traffic and the Millennium Project – Comments by Robert Silverstein
CityWatch June 28, 2013 Hollywood Residents Get the Millennium Shaft

The 2013 DEIR is relevant since not much has changed...

Hollywood Center is STILL Millennium.

The Millennium disaster in San Francisco, unsafe leaning and tilting Millennium Tower, that used the same consultants as Millennium used to claim Millennium Hollywood building site is SAFE, that Millennium KNEW was tilting and sinking but kept it secret while they continued to sell condos, blamed everyone else..claimed nothing was their fault, is still tilting and in the news, now an infamous nightmare development, with more law suits than San Francisco has ever seen, and a tourist attraction.

What’s new about Millennium Hollywood Center?

The buildings are still the best example of obscene developer greed, a NYC developer who could care less about HOLLYWOOD, and his funded puppet politicians generously paid, and helped get elected, to look the other way regarding traffic safety, earthquake safety, peoples lives, and destruction of Hollywood HISTORIC RESOURCES, compromising the National Historic Register of Famous Places area and the world renown Historic Cultural Monument Capitol Records Building and Hollywood Sign.

Traffic in the area is WORSE, than it was when Judge Chalfant shut Millennium projects down due to the phony EIR, that made traffic stuff up, and pretended the traffic would have no impacts, and ignored Caltrains warnings about the ‘deadly, unsafe’ traffic

It’s WORSE now with all the new oversized projects the city has approved and are up...

The building site still has a state geologist confirmed active EQ fault running through it...still denied by Millennium.

Groups, organizations opposed are already lining up for those generous Millennium bribes to ‘like’ the projects they hate and know will disrupt their businesses, ruin the area, and compromise the beautiful historic resources.

The same politicians are still...there, the councilmembers, mayor, etc., who have sold out Hollywood and Hollywoodians and Angelinos who love Hollywood and its iconic Cultural Resources...the politicians who owe their political careers to Millennium.

What HAS changed is the developer politics PAY TO PLAY corruption has been revealed, and many that enabled Millennium projects being approved the last time have been, are being, investigated by the FBI, indicted, or resigned.

And the investigations are on going.

William A. Miller
Los Angeles, Ca.