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April 17, 2020

VIA EMAIL mindy.nguyen@lacity.org

Mindy Nguyen
City of Los Angeles, Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

Re: Objection to 45-Day Comment Period for Hollywood Center Project Draft Environmental Impact Report (“DEIR”); Case Number ENV-2018-2116-EIR; State Clearinghouse Number 2018051002

Dear Ms. Nguyen:

This firm and the undersigned represent stpmh.com (“STMH”), a community group that actively participated in, and litigated against, the prior iteration of the newly-named “Hollywood Center” project. STMH and its supporters have an interest in actively and meaningfully participating in the current DEIR comment process, but cannot do so in the constrained, 45-day comment period imposed by the City.

We object to the City providing only the minimum allowed comment period during the unprecedented economic, social and public health upheaval resulting from the COVID-19 pandemic. The pandemic has resulted in City and State emergency declarations and stay-at-home orders that prohibit members of the public from conducting travel to visit the Department of City Planning offices for in-person review of documents. Members of the public who rely on in-person document review risk being silenced altogether, as public libraries have closed and residents are legally prohibited from non-essential travel to use a friend or neighbor’s computer and internet. Greater time is essential for the public to safely and lawfully access the DEIR and to be able to formulate comments on it.

The bare minimum 45-day comment period further prejudices STMH and the public by preventing other governmental agencies from having adequate time to fairly review and comment on the DEIR. At least two state agencies, Caltrans and the California Geological Survey, were previously involved in and actively commented on

the prior iteration of the proposed project. There is every reason to expect they will be concerned about the public safety impacts posed by the project this time. However, they are hobbled by limited staffing and access to their offices and materials. For example, Caltrans District 7's entire offices are closed and its personnel scattered. Indeed, I assume that you yourself, as well as Planning Department officials copied on this letter, are not physically in your offices in any normal sense.

It cannot be possible that Mayor Garcetti, Councilman O'Farrell, and City Planning believe the minimum 45 days for the public to comment is appropriate under these trying circumstances.

The commencement of the running of the DEIR comment period, which period should be at least 90 days, should be tolled to a date after the lifting of local and state stay-at-home orders. At a minimum, it should be extended to 120 days from yesterday.

Given the thousands of pages of technical documents just released, and the impacts of the crisis now raging, anything less will prejudice the public and governmental agencies whose duties are to protect the public health, safety and welfare.

Please include this letter in the administrative record for this matter, and please promptly reply with a public announcement tolling or extending the comment period. Thank you.

Very truly yours,

/s/ Robert P. Silverstein

ROBERT P. SILVERSTEIN

FOR

THE SILVERSTEIN LAW FIRM, APC

RPS:vl

cc: Mayor Eric Garcetti (mayor.garcetti@lacity.org)
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