

wd: Hollywood Center: Further Request to Extend 45-Day Comment Period and Objections re Corrupted Documents in Hollywood Center Draft EIR; Case Number ENV-2018-2116-EIR; State Clearinghouse Number 2018051002

message

Nicholas Maricich <nicholas.maricich@lacity.org>
To: William Chun <william.chun@lacity.org>

Fri, May 22, 2020 at 12:14 P

FYI



Nicholas P. Maricich | Director of Planning Policy and Development
Office of Mayor Eric Garcetti
City of Los Angeles
Office: (213) 978-0785
Cell: (213) 626-9523

----- Forwarded message -----

From: **Robert Silverstein** <robert@robertsilversteinlaw.com>

Date: Fri, May 22, 2020 at 11:46 AM

Subject: Hollywood Center: Further Request to Extend 45-Day Comment Period and Objections re Corrupted Documents in Hollywood Center Draft EIR; Case Number ENV-2018-2116-EIR; State Clearinghouse Number 2018051002


To: <councilmember.ofarrell@lacity.org>, <craig.bullock@lacity.org>, <david.ryu@lacity.org>, <emma.howard@lacity.org>, <jeanne.min@lacity.org>, <kevin.keller@lacity.org>, Luciralia Ibarra <luciralia.ibarra@lacity.org>, <mayor.garcetti@lacity.org>, <mindy.nguyen@lacity.org>, Nicholas Greif <nicholas.greif@lacity.org>, <nicholas.maricich@lacity.org>, <vince.bertoni@lacity.org>

Dear Mayor Garcetti, Councilmembers O'Farrell and Ryu, Planning Director Bertoni, and City officials:

Please see attached urgent letter, and please reply. Thank you.

Robert P. Silverstein, Esq.
The Silverstein Law Firm, APC
215 North Marengo Avenue, 3rd Floor
Pasadena, CA 91101-1504
Telephone: (626) 449-4200
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 **5-22-20 [SCAN] Further Request to City Planning (Nguyen) for Extension of DEIR Comment Period.PDF**
4717K

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May 22, 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: Further Request for Extension of 45-Day Comment Period for, and
Objections to Substantive Corruption in, Hollywood Center Project Draft
Environmental Impact Report; Case Number ENV-2018-2116-EIR; State
Clearinghouse Number 2018051002

Dear Ms. Nguyen and City Officials:

This firm and the undersigned represent Stopthemillenniumhollywood.com (“STMH”), a community group that actively participated in, and successfully litigated against, the prior version of the newly-named “Hollywood Center” project. STMH, its supporters and other members of the public have an interest in meaningfully participating in the current Draft EIR comment process, but are impaired from fully doing so in the constrained, 45-day comment period imposed by the City. They are also impaired from fully doing so because the Draft EIR contains multiple pages with corrupted and illegible text and figures, including in every single Figure and Plate of Appendix G-1 regarding the most pressing issue of public health and safety related to earthquake fault risk.

As to the City’s continued unreasonable and illegal (see below) refusal to extend the comment period on a 13,000-page Draft EIR dropped on the public during the pandemic, we note that for the prior Millennium Hollywood Draft EIR on the same site and by the same developer, then-Councilman Garcetti requested an extension of that 45-day public comment period, which was granted. In his November 2, 2012 letter, he wrote:

“The Planning Department has released the draft Environmental Impact Report (EIR) for the proposed Millennium Project at 1750 Vine Street, which commenced a 45 day public comment period.

The proposed project is large in scale and includes what could be one of the tallest buildings in all of Hollywood. As I'm sure you are aware, the proposed project has generated controversy among my constituents. Accordingly, I request that the public comment period be extended to 60 days to increase the public's opportunity to comment on the draft EIR." (**Exhibit 1.**)

That the City Planning Department and City officials, including Mayor Garcetti and Councilmen O'Farrell and Ryu have not yet secured for the public an extension to comment on a similarly massive project, and in the midst of the COVID-19 pandemic, is truly a deplorable low even for this City government.

Mayor Garcetti's comment quoted above remains accurate today: "The proposed project is large in scale and includes what could be one of the tallest buildings in all of Hollywood." (**Exhibit 1.**)

It is actually an understatement. The proposed project is over a million square feet and would indisputably contain the tallest building in all of Hollywood – not to mention, place it on an active 7.0 earthquake fault as shown by the State of California in its Alquist-Priolo Map.

Further, "[a]s I'm sure you are aware, the proposed project has generated controversy." (**Exhibit 1.**) That, too, remains accurate, and an understatement. From the groundswell of requests for an extension that you have already received, you know of the controversy generated by the current proposed project.

As you are also aware from my office's litigation against the Millennium Hollywood project and our exposure of repeated violations of the law by the City related to this site and developer (see trial court and Court of Appeal rulings in Stopthemillenniumhollywood.com, et al. v. City of Los Angeles, et al., Case Nos. BS144606 and B282319; see also **Exhibit 2**, May 20, 2020 Los Angeles Times article, "Here's a closer look at the ex-deputy mayor enmeshed in City Hall corruption probe"), the proposed project is generating extreme controversy among City residents, property owners and stakeholders.

It should go without saying that an extension of the public comment period is appropriate and warranted. That the City refuses to provide that, even against its own precedent related to the same site, only adds to the controversy.

We also note how routinely such extensions are normally granted. For example, the City's July 30, 2019 Notice of Extension of the comment period, for an additional 30 days, for the nearby citizenM Hollywood & Vine project (**Exhibit 3**), when no pandemic was present, further highlights the outrageousness of the City's refusal to extend the public comment period now.

As our Supreme Court has held:

“The EIR is . . . intended ‘to demonstrate to an **apprehensive citizenry** that the agency has, in fact, analyzed and considered the ecological implications of its action.’ [Citations.] Because the EIR must be certified or rejected by public officials, it is a document of accountability. . . . The EIR process protects not only the environment but also informed self-government.” Laurel Heights Improvement Assn. v. Regents of University of California (1988) 47 Cal.3d 376, 392 (emphasis added).

As instructed in a Court of Appeal decision in another California Environmental Quality Act (“CEQA”) case where the City lost:

“The fundamental goals of environmental review under CEQA are information, participation, mitigation, and accountability.” Lincoln Place Tenants Ass’n. v. City of Los Angeles (2007) 155 Cal.App.4th 425, 443-444.

Mayor Garcetti, the City Council and City Planning have an apprehensive citizenry – heightened by the City's past and present actions. Those actions, including the refusal to extend the Hollywood Center public comment period, impair CEQA's fundamental goals.

Finally, we note not only the City's disingenuous position, but the actual illegality of refusing to extend the public comment period during the pandemic. The City's due process violations in this regard have been raised by this office and many others dealing with the impacts of the COVID-19 situation and the shut-down orders.

As one further example, Hollywood resident Mary Ledding has written to you regarding the prejudice to herself, her neighbors and the general public by the City's conduct, which conduct is not ameliorated by the City's offers to provide flash drives (useless for people without computers) or dilatory delivery of reams of paper print-outs.

Ms. Ledding noted in a May 21, 2020 email:

“I did get the flashdrive but of course that requires a computer to use. It will be of no help to our neighbor who doesn't use computers. I have not received the print-outs [requested many days earlier]. [¶] My question, of course, is how are people expected to be able to review this vast report in the extremely short time frame the City is allowing? . . . I don't know the total pages of the DEIR but assuming it approaches 3000 pages including the essential appendices and cites [it is actually 13,000 pages], and assuming you get us a print copy by end of business tomorrow, that means we have to review 300 pages a day AND write intelligent comments hopefully with the benefit of some sort of community zoom conversation all while citizens are still "sheltering at home", doing their own schooling, cooking, and, if they are lucky, working their jobs. This is not reasonable nor does it provide the City with thoughtful, relevant comments to this massive, community-rendering project. The City needs to grant an extension on the deadline. Please take this matter up again. This process is a disgrace to the community that will have to live with it for decades to come.”

In my April 27, 2020 letter, I objected to the City's failure to extend the public comment period in light of the COVID-19 crisis, and in particular, the absence of public access to hard copies of the Draft EIR in the usual locations of (now-closed) local libraries and the (now-closed without appointment) City Planning Department. I noted:

“While Mayor Garcetti announces that “LA is ‘under attack’ and will need to furlough thousands of city workers” (LA Times, April 19, 2020), the public is doubly under attack by a process so transparently designed to harm community members and groups under attack not only by COVID-19, but by a cynical Draft EIR comment process meant to elevate the interests of a developer over the rights of the public that City officials were elected to serve.”

The City responded on April 28, 2020 with an email that gave the facile and untrue response that “the Draft EIR remains accessible to all individuals” because the documents were all on line, thereby implying that everyone who wanted to review the Draft EIR should be able, on their own, to have a computer, an internet connection and sufficient bandwidth to download this 13,000-page document and lengthy technical

appendices.¹ I again objected, in a letter dated April 29, 2020, reminding the City of Mayor Garcetti's lock-down order that closed the libraries and City Hall.

¹ Further, in the City's haste to release the Draft EIR during the most painful and inconvenient time for the public, the City released a Draft EIR PDF document with file corruption containing "bugs" that have distorted critical information, including throughout the "Figures and Plates" in Appendix G-1, 2015 Fault Activity Investigation. Every figure and plate has critical text and/or numbers replaced or overwritten by blank square boxes. (See, e.g., sample pages G-1, 50 & 51, and enlargements of same, attached at **Exhibit 4**.)

This is true of all of the figures and plates in Appendix G, totaling 18 pages (8 figures; 10 plates). The same distorted text also occurs in Appendix E within Appendix G-1.) This is not intended to be an inventory of all the distorted pages, figures and images marring the Draft EIR. There may be more. However, it is the City's duty to identify and fix through a recirculated Draft EIR. It is enough that we have pointed out to you the double injustice of forcing people to try to comment in this truncated time frame, on pages – in one of the most critical subject areas, i.e., earthquakes and seismology – which are obviously and substantively distorted.

To confirm this fatal informational flaw in the Draft EIR, we downloaded PDFs and got the same result with boxes masking critical text and figures. We used Adobe 2017, which states that it is the same as Adobe DC. We used different computer systems to view the PDF in Adobe 2017 Professional and Adobe DC Professional. We also hard printed. The pages came out with the same boxes blanking out text and figures, often in ways that are completely unreconstructable. Finally, to be 100% sure, we had an IT consultant upload the file to a new PC with Adobe DC Pro, and had the same result.

That the City has circulated a Draft EIR with information concealed or obliterated concerning the most pressing issue of public health and safety related to earthquake fault risk is especially unacceptable.

Accordingly, a full and complete Draft EIR has not yet been released to the public, even assuming everyone could access the current distorted version on the internet. This is an additional legal basis for requiring that the Draft EIR public comment period be extended, or more appropriately, restarted once a correct Draft EIR is prepared and made available to the public, with all text, numbers, figures and plates fully legible.

The City's cavalier, let-them-use-internet attitude ignores the very real fact that not all communities have the same access to computers, and sometimes lack the ability to access the internet. The libraries where they might usually access the internet are closed, making the City's assertion about universal and timely access to the Draft EIR patently untrue. This inability to access the internet is particularly and painfully true now, when rampant unemployment is making many people choose between food and rent payments. The City's assumption that they can afford a laptop and internet access is both arrogant and discriminatory, and denies many the ability to meaningfully participate in the City's decision-making about this proposed project.

The City's conduct does not comport with both long-standing and recent legislation defining environmental justice. Assembly Bill 1628 was signed into law by Governor Newsom on September 27, 2019, and took effect this year. The bill's Section 1, subd. (b), provides:

“It is therefore the intent of the Legislature to ensure that the populations and communities disproportionately impacted by pollution *have equitable access to, and can meaningfully contribute to, environmental and land use decisionmaking*, and can enjoy the equitable distribution of environmental benefits.” (Emphasis added.)

This definition of “environmental justice” expanded the existing definition in Government Code Section 65050.12, subd. (e):

“‘[E]nvironmental justice’ means the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.”

While AB 1628 only formally amended the Coastal Act and the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, the intent of the Legislature is clear that environmental justice must include equal access by all communities to information about governmental decisions that may affect them, and equal opportunity to participate in the making of those governmental decisions. The City has denied equal access and “fair treatment” regarding the Hollywood Center project and the impacts it may have on the community's physical environment.

As with all of our communications, please ensure that this letter and attachments or printed out links therein are included in the running administrative record for this case.

City of Los Angeles, Department of City Planning
May 22, 2020
Page 7

To conclude, we renew our requests, and that of multiple community members and groups, for a tolling or extension of the current, June 1, 2020 public comment deadline.

In light of the seismic/earthquake fault Figures and Plates being corrupted, this is even more urgent, and legally mandated. Sadly, corruption permeates the Draft EIR, literally and figuratively.

Please publicly advise – as far in advance of June 1, 2020 as possible – regarding extending or restarting the public comment period. Thank you.

Very truly yours,

/s/ Robert P. Silverstein

ROBERT P. SILVERSTEIN

FOR

THE SILVERSTEIN LAW FIRM, APC

RPS:vl
Encls.

cc: Mayor Eric Garcetti (mayor.garcetti@lacity.org)
Councilman Mitch O'Farrell (councilmember.ofarrell@lacity.org)
Councilman David Ryu (david.ryu@lacity.org)
Vince Bertoni, Dir. Of City Planning (vince.bertoni@lacity.org)
Kevin Keller, Exec. Officer of City Planning (kevin.keller@lacity.org)
Nicholas Greif, CD 4 Chief of Staff (nicholas.greif@lacity.org)
Emma Howard, CD 4 Planning Deputy (emma.howard@lacity.org)
Jeanne Min, CD 13 Chief of Staff (jeanne.min@lacity.org)
Craig Bullock, CD 13 Planning Director (craig.bullock@lacity.org)
Nicholas Maricich, Mayor's Office, Director of Planning
(nicholas.maricich@lacity.org)
Luciralia Ibarra, City Planner (luciralia.ibarra@lacity.org)

EXHIBIT 1



ERIC GARCETTI
COUNCILMEMBER, CITY OF LOS ANGELES • DISTRICT 13

November 2, 2012

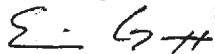
Los Angeles City Planning Department
200 N. Spring St, Room 525
Los Angeles, CA 90012

Attn: Planning Director, Michael LoGrande

Dear Michael:

The Planning Department has released the draft Environmental Impact Report (EIR) for the proposed Millennium Project at 1750 Vine Street, which commenced a 45 day public comment period. The proposed project is large in scale and includes what could be one of the tallest buildings in all of Hollywood. As I'm sure you are aware, the proposed project has generated controversy among my constituents. Accordingly, I request that the public comment period be extended to 60 days to increase the public's opportunity to comment on the draft EIR.

Sincerely,



ERIC GARCETTI
Councilmember, 13th District

CITY HALL OFFICE: 200 NORTH SPRING STREET, ROOM 475 • LOS ANGELES, CA 90012 • 213.473.7013 • FAX: 213.613.0819
HOLLYWOOD DISTRICT OFFICE: 5500 HOLLYWOOD BLVD., 4TH FLR • LOS ANGELES, CA 90028 • 323.957.4500 • FAX: 323.957.6841
GLASSSELL PARK DISTRICT OFFICE: 3750 VERDUGO RD. • LOS ANGELES, CA 90065 • 323.478.9002 • FAX: 323-478-1296

COUNCILMEMBER.GARCETTI@LACITY.ORG • WWW.CD13.COM



RL0010951

EXHIBIT 2

Here's a closer look at the ex-deputy mayor enmeshed in City Hall corruption probe



Former Deputy Mayor Raymond Chan, left, and Los Angeles Mayor Eric Garcetti. (Los Angeles Department of Building and Safety; Associated Press)

By [Emily Alpert Reyes](#), [Joel Rubin](#)
May 20, 2020 | 5 AM

Raymond Chan earned praise at City Hall for his eagerness to smooth out city bureaucracy for developers, both as the head of Los Angeles' building department and later as a deputy mayor focused on economic development.

When Chan stepped down from city service, Mayor Eric Garcetti credited him with helping to usher in L.A.'s development boom and [lauded](#) him as a “true public servant.”

Now court records in an ongoing federal probe into corruption at City Hall tell a different story. Prosecutors have alleged that a deputy mayor was paid by a real estate consultant to help shepherd a major project through City Hall — and leveraged his power as a city official to aid the development.

Although federal investigators did not name the former deputy mayor in court papers, details about his employment history make clear it is Chan, including the dates that he headed the Los Angeles Department of Building and Safety and when he was appointed deputy mayor for economic development. He has not been charged with a crime.

Chan has long been known to be under scrutiny by investigators: He was previously named in a [federal warrant](#) seeking evidence of possible crimes involving more than a dozen people, which surfaced more than a year ago. The warrant, served on Google, sought records from his email account.

But the latest filing spells out much more about what investigators are probing about the former deputy mayor and building chief, whose enthusiasm for fostering new development had long polarized his fans and critics.

The allegations surrounding such an important figure — a City Hall veteran who led a department crucial to real estate development — could deepen the [distrust in local government](#) that has been fueled by the federal investigation.

Chan did not respond to phone messages seeking comment. His attorney, Harland Braun, said Chan had done nothing wrong. Chan was recognized in the development industry as a “helpful, go-to person whenever help or advice was needed” and “never asked for or received anything in return for his own interest or benefit,” Braun said.

The new allegations emerged when one of Chan’s business associates became the third person charged in the sweeping investigation into alleged pay-to-play schemes at L.A. City Hall. Real estate consultant George Chiang has [agreed to plead guilty](#) to participating in a criminal enterprise that included helping a Chinese firm bribe an L.A. City Council member and paying a deputy mayor to usher along a development project.

Garcetti, asked about the federal allegations involving a former deputy mayor, said last week that he had “zero tolerance” for the alleged wrongdoing detailed by prosecutors.

Chan had long been seen as a friend to development. Six years ago, when Chan was chosen to permanently take over the building department, council members praised him for cutting red tape. Councilman Mitch O’Farrell said he had “made great strides in reducing the number of steps that it takes to get projects off the ground,” bolstering the economy.

Robert “Bud” Ovrom, who headed the building department before Chan, described Chan as a “Mr. Fix It” who was bullish about development and extremely accommodating to council members.

“If a councilman asked Ray, ‘What does two and two equal?’ he would answer by saying, ‘What do you want it to equal?’ ” said Ovrom, who added that he was stunned by the allegations in the federal case.

Chan emphasized his efforts to streamline L.A.’s permitting process. In a slideshow for employees after Chan got the job, the department urged employees to be flexible and focus on the intent of city codes. It offered up a scenario of a man who orders a set dinner in a restaurant and is told he cannot substitute fruit for Kahlua cream pie.

<https://www.latimes.com/california/story/2020-05-20/federal-corruption-investigation-la-city-hall-ray-chan>

“Would the man eat at the restaurant again?” the slideshow asked. “Could the restaurant be more reasonably flexible?”

Robert P. Silverstein, an attorney who has represented neighborhood groups suing the city over development decisions, said he was disturbed that the building department seemed to see developers, not the public, as its customers. He argued that the department “reached a truly deplorable low under Chan,” who led the department as either its interim or permanent chief from 2013 to 2016.

Opponents of the Millennium Hollywood skyscraper project, which was thwarted by legal challenges brought by Silverstein, argued that Chan had a [conflict of interest](#) because his son was a paid intern at a law firm that represented the Millennium developer. Silverstein complained that “instead of cleaning house, Garcetti promoted Chan to deputy mayor” in 2016.

Chan said shortly after the complaint was submitted that he had been [cleared](#) of wrongdoing. A Garcetti spokesman said the matter “was referred to the Ethics Commission, which declined to take any enforcement action.”

In federal filings last week, prosecutors laid out a bribery plot involving Chiang, his business partners and an unnamed Los Angeles City Council member. Details in court filings have made clear that the politician is Councilman Jose Huizar, whose attorneys have repeatedly declined to comment.

Prosecutors also detailed the role of “Individual 1,” describing him as a former deputy mayor who first met Chiang at an event hosted by the Chinese firm that pursued the hotel-and-residential project involved in the alleged bribes. The man told Chiang he was well-respected as the general manager of the building department, their filing said.

The unnamed man later asked over lunch whether Chiang was interested in consulting on downtown development projects and offered to introduce Chiang to city officials, according to the plea deal.

Individual 1 “indicated that his goal was to ensure the success of Chinese projects in Los Angeles,” prosecutors said. He instructed Chiang to set up a consulting company to carry out his goals, and Chiang formed Synergy Alliance Advisors, according to the federal filings. The two later formed CCC Investment Group, which worked with development companies.

Chiang became a consultant on a planned project that would redevelop the Luxe City Center Hotel across from the L.A. Live entertainment complex, proposed by the Chinese firm Shenzhen Hazens. Prosecutors did not name the development involved in the alleged bribery scheme, but details in their filings — including the number of hotel rooms and residential units and the dates of City Hall votes — match the downtown project.

The plea deal states that the deputy mayor reached an agreement with Chiang to help with the planned project in exchange for “future payments.” While the deputy mayor was still working

for the city, he prepared weekly lists of tasks for the project, led project meetings and assigned tasks to Chiang to advance the project, according to the plea deal.

He also leveraged his official position to pressure subordinates to take favorable steps for the project, set up a meeting between the planning department and company officials pursuing the development, and met with a member of the City Planning Commission to urge them to approve it, prosecutors alleged. Months after he left his city job in 2017, he was paid \$112,000 for his assistance with the project as deputy mayor, according to prosecutors.

Shortly after leaving his city job, during the period when he was barred from lobbying city officials, the former deputy mayor asked a top staffer to an unnamed council member — identified only as “City Staffer D” — to ask a Garcetti staffer to pressure the commission to approve the project, according to prosecutors. Soon afterward, Chiang set up a consulting agreement to benefit a relative of City Staffer D, the filing states.

The Times also [reported](#) last year that while serving as deputy mayor, Chan had raised tens of thousands of dollars for Asian Pacific American Heritage Month celebrations from real estate developers who were seeking city approvals or awaiting building inspections.

Chan told a council aide that he had secured a \$10,000 donation from Shenzhen Hazens. Experts said such fundraising activities are legal but could raise ethical concerns, depending on how much influence Chan had over those companies.

EXHIBIT 3

**DEPARTMENT OF
CITY PLANNING**

COMMISSION OFFICE
(213) 978-1300

CITY PLANNING COMMISSION

SAMANTHA MILLMAN
PRESIDENT

VAHID KHORSAND
VICE-PRESIDENT

DAVID H. J. AMBROZ
CAROLINE CHOE
HELEN LEUNG
KAREN MACK
MARC MITCHELL

VERONICA PADILLA-CAMPOS
DANA M. PERLMAN

**CITY OF LOS ANGELES
CALIFORNIA**



ERIC GARCETTI
MAYOR

EXECUTIVE OFFICES

200 N. SPRING STREET, ROOM 525
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VINCENT P. BERTONI, AICP
DIRECTOR

KEVIN J. KELLER, AICP
EXECUTIVE OFFICER

SHANA M.M. BONSTIN
DEPUTY DIRECTOR

TRICIA KEANE
DEPUTY DIRECTOR

ARTHI L. VARMA, AICP
DEPUTY DIRECTOR

LISA M. WEBBER, AICP
DEPUTY DIRECTOR

July 30, 2019

NOTICE OF EXTENSION

**THIS IS TO SERVE NOTICE THAT THE FINAL DAY OF THE COMMENT PERIOD FOR
DRAFT EIR CASE NO. ENV-2016-2846-EIR (SCH NO. 2016101009)
HAS BEEN EXTENDED FROM July 30, 2019 TO August 29, 2019**

TO: Owners of Property and Occupants and Other Interested Parties

PROJECT NAME: citizenM Hollywood & Vine

SITE LOCATION: 1718 N. Vine Street, Los Angeles, CA 90028

COMMUNITY PLAN AREA: Hollywood Community Plan Area

COUNCIL DISTRICT: 13—Mitch O'Farrell

COMMENT REVIEW PERIOD: June 13, 2019—August 29, 2019

PROJECT DESCRIPTION: The Project includes development of a hotel on an approximately 0.28-acre site located at 1718 N. Vine Street (Project Site) in the Hollywood community of the City. The Project would include 240 guest rooms, approximately 2,742 square feet of guest amenities, and approximately 5,373 square feet of shared guest and public spaces. The building would have a maximum height of 185 feet and would consist of 13 above-ground levels (including a mechanical mezzanine level above Level 1) and five subterranean levels. The Project would provide 79 vehicular parking spaces and 72 bicycle parking spaces within five subterranean levels of parking in accordance with LAMC requirements. All vehicular parking would be valet only. Upon completion, the Project would result in approximately 73,440 square feet of new floor area and a maximum floor area ratio (FAR) of 6:1.

ANTICIPATED SIGNIFICANT ENVIRONMENTAL EFFECTS: Based on the analysis included in the Draft EIR, the Project would result in significant and unavoidable Project-level impacts related to on-site noise and vibration (human annoyance) and off-site vibration (human annoyance) during construction. In addition, the Project would result in significant and unavoidable cumulative on-site noise, off-site noise, on-site vibration (human annoyance), and off-site vibration (human annoyance) during construction. All other potential impacts would be less than significant or mitigated to less-than-significant levels.

FILE REVIEW AND COMMENT: The Draft EIR and the documents referenced in the Draft EIR are available for public review at the City of Los Angeles, Department of City Planning, 221 N. Figueroa Street, Suite 1350, Los Angeles, CA 90012 during office hours Monday–Friday, 9:00 A.M.–4:00 P.M. Please contact the Staff Planner listed below to schedule an appointment.

The Draft EIR is also available online at the Department of City Planning's website at <http://planning.lacity.org> (click on the "Environmental Review" tab on the left-hand side, then "Draft EIR," and click on the Project title), and copies are also available at the following Library Branches:

- 1) Central Library, 630 W. 5th Street, Los Angeles, CA 90071
- 2) Francis Howard Goldwyn Hollywood Regional Library, 1623 N. Ivar Avenue, Los Angeles, CA 90028
- 3) Will & Ariel Durant Branch Library, 7140 W. Sunset Boulevard, Los Angeles, CA 90046
- 4) John C. Fremont Branch Library, 6121 Melrose Avenue, Los Angeles, CA 90038

The Draft EIR can also be purchased on CD-ROM for \$5.00 per copy. Contact Erin Strelch at (213) 847-3626 to purchase copies.

The review period for the Draft EIR begins on June 13, 2019, and ends on August 29, 2019. If you wish to submit comments regarding the Draft EIR, please reference the file number above and submit them in writing by 4:00 p.m. on August 29, 2019.

Please direct your comments to:

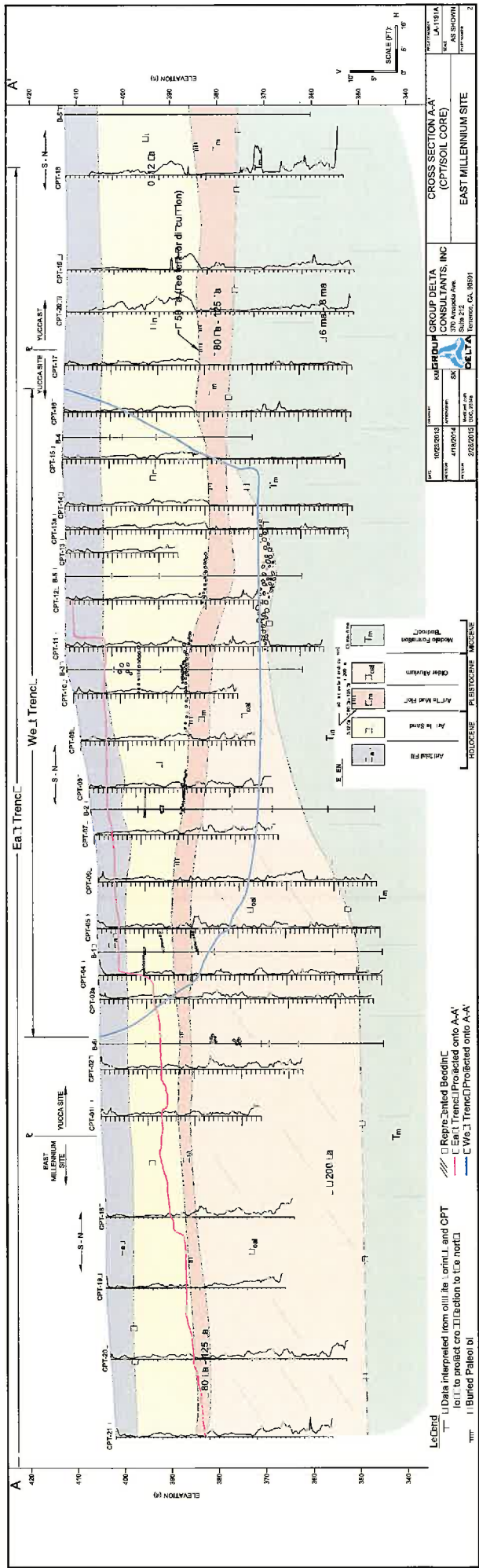
Erin Strelch
Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012
E-mail: erin.strelch@lacity.org

VINCENT P. BERTONI, AICP
Director of Planning



Erin Strelch
Major Projects Section
Department of City Planning
(213) 847-3626

EXHIBIT 4



PROJECT NO.	0022013	CLIENT	GROUP DELTA CONSULTANTS, INC.
DATE	01/20/14	PROJECT	CROSS SECTION A-A' (CPTS/SOIL CORE)
REVISION	01/20/14	PROJECT	EAST MILLENNIUM SITE
DATE	02/20/13	PROJECT	
DATE	02/20/13	PROJECT	

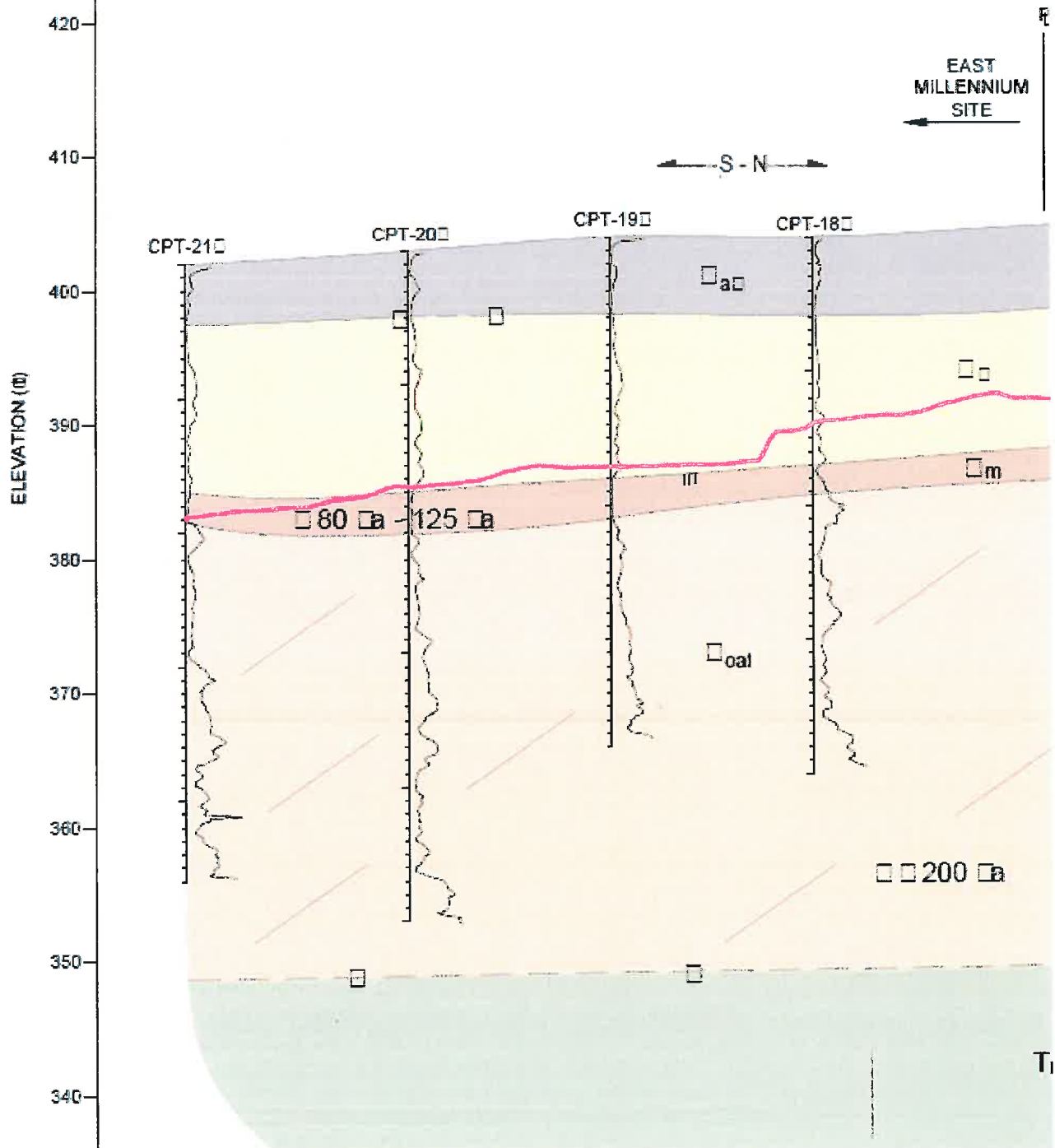
DATE	02/20/13	PROJECT	GROUP DELTA CONSULTANTS, INC.
DATE	02/20/13	PROJECT	EAST MILLENNIUM SITE

DATE	02/20/13	PROJECT	GROUP DELTA CONSULTANTS, INC.
DATE	02/20/13	PROJECT	EAST MILLENNIUM SITE

DATE	02/20/13	PROJECT	GROUP DELTA CONSULTANTS, INC.
DATE	02/20/13	PROJECT	EAST MILLENNIUM SITE

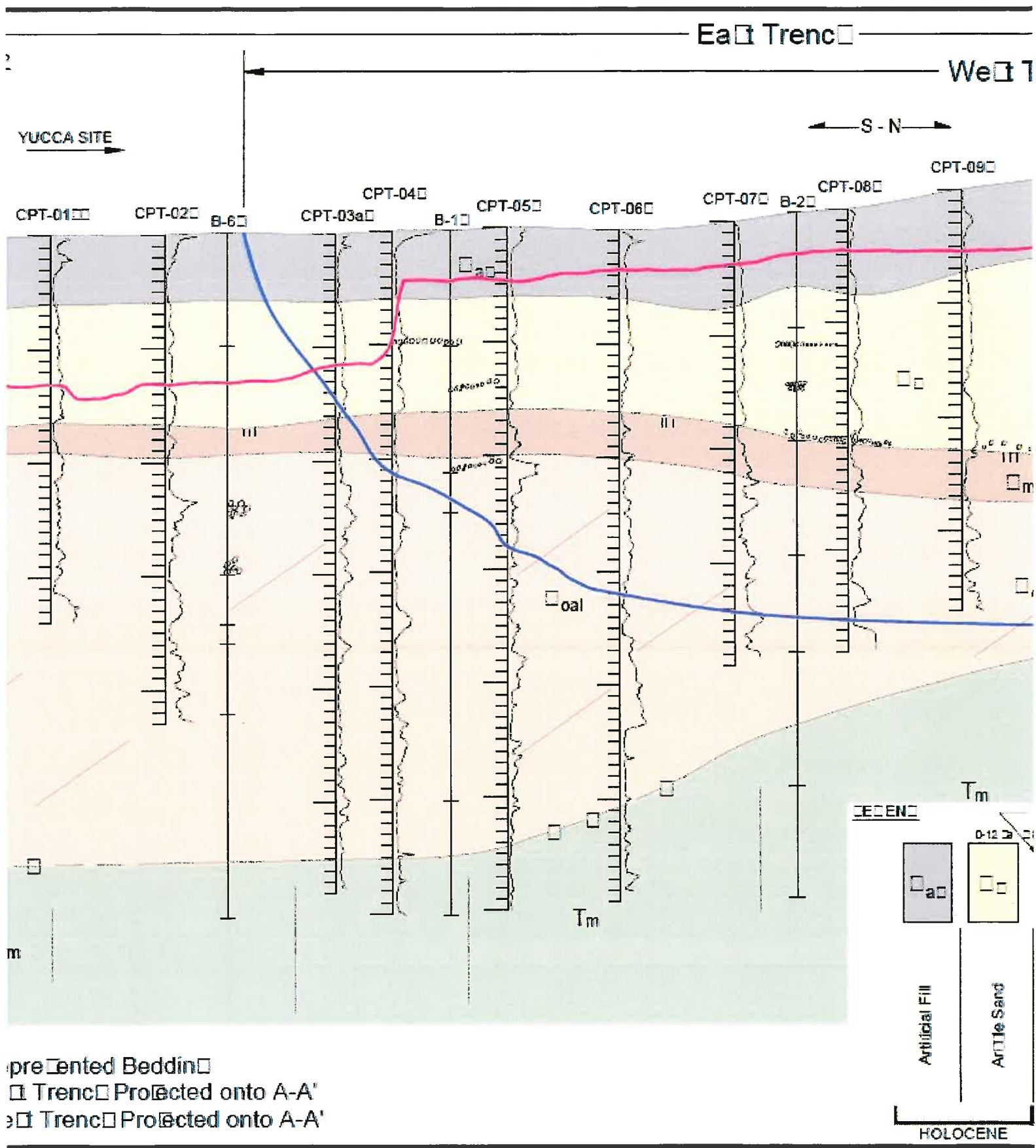
Legend:
 □ Data interpreted from other logs
 □ Data projected onto A-A'
 □ Data projected onto E-E'
 □ Buried Paleosol

A



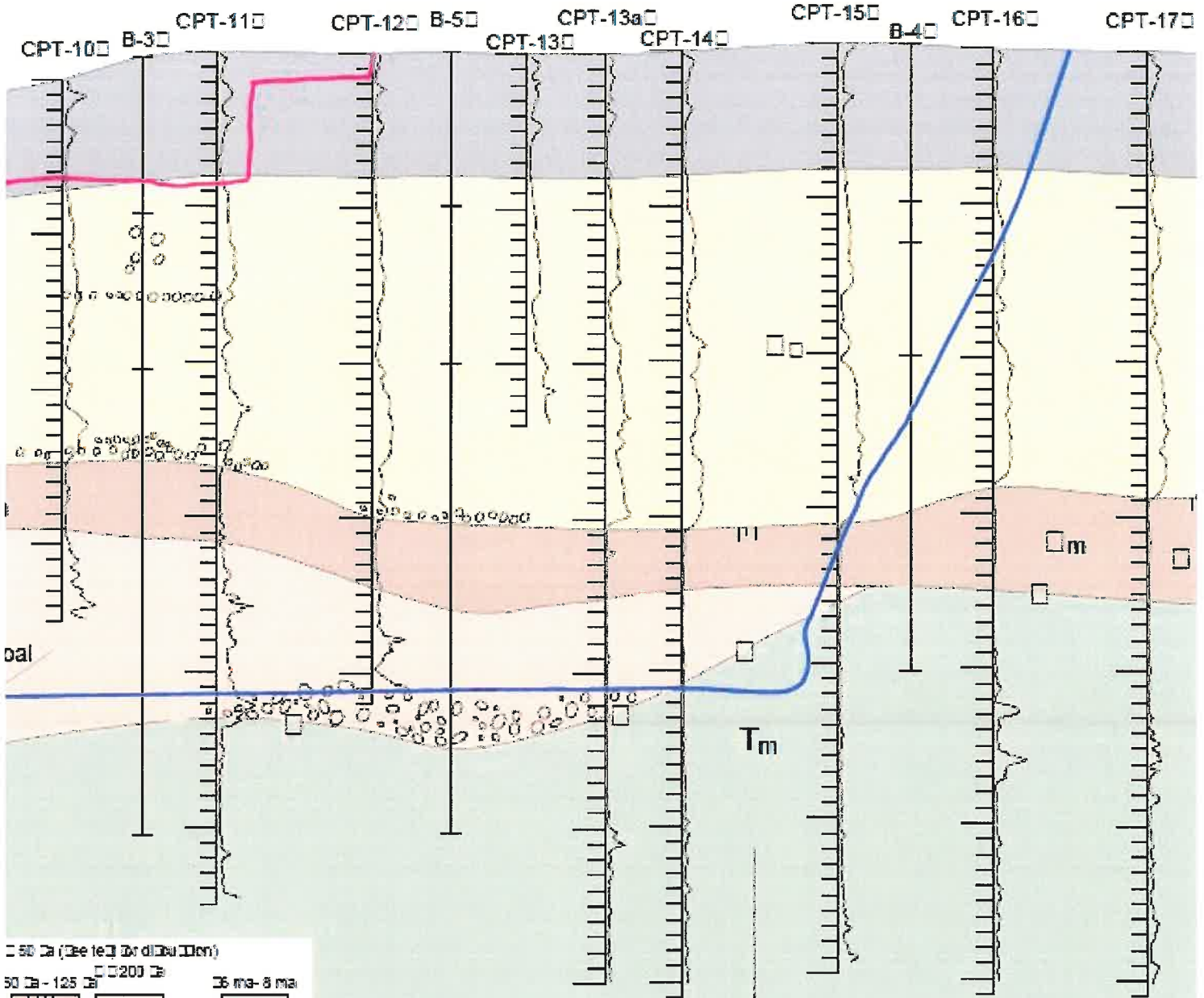
Legend

- Data interpreted from o...ite ... and CPT
- lo... to protect cro... section to the north
- Buried Paleo...
- Re...
- Ea...
- We...

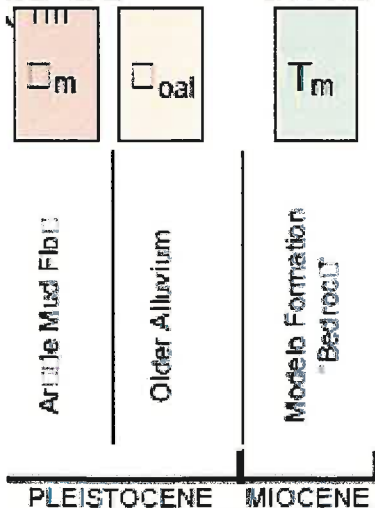


renc

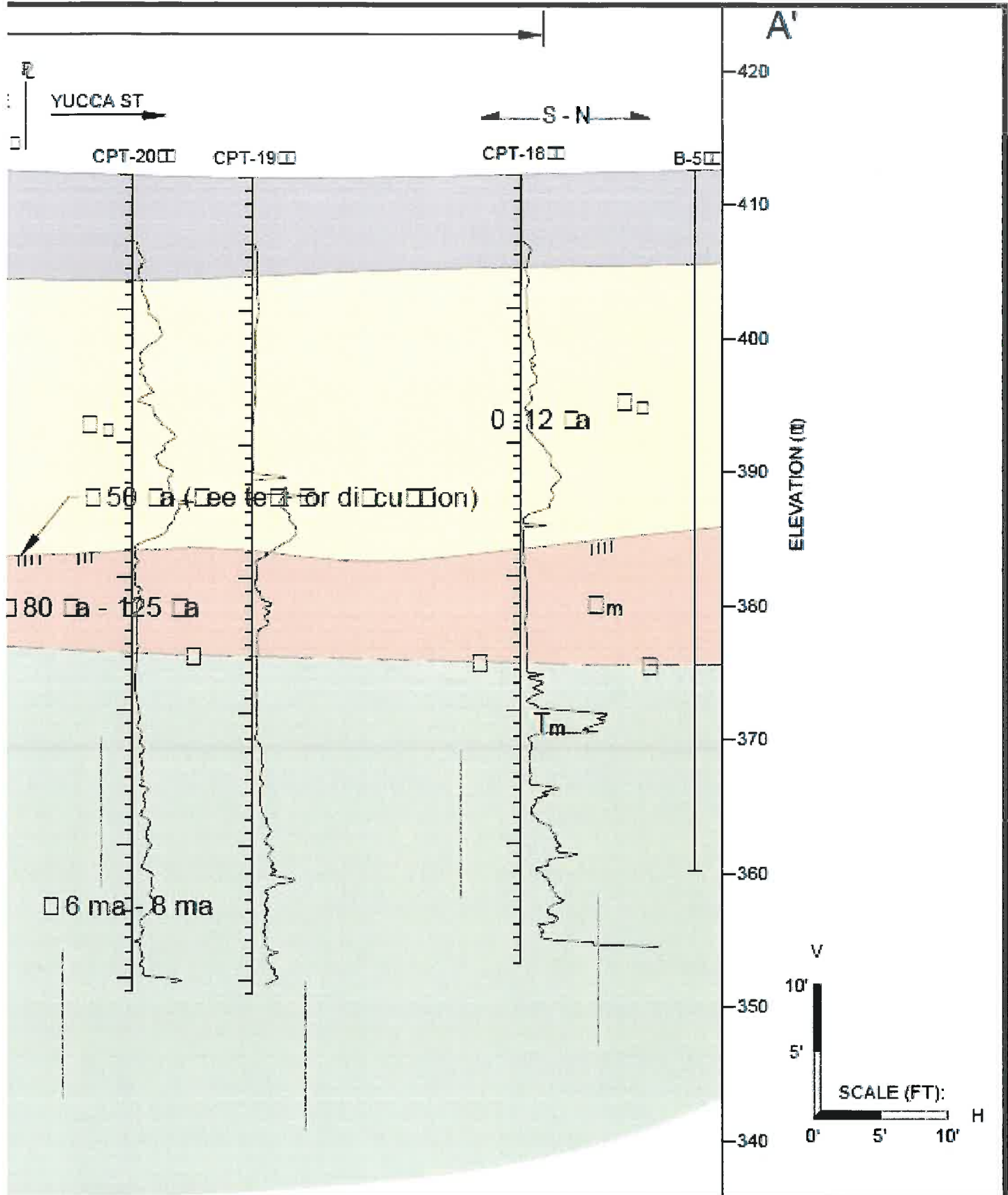
YUCCA SITE



50 (Scale in feet) (100 cm)
 50 125 200 250
 35 ma - 8 ma



DATE	10/23/2013	DRAWN BY:	KM	
REVISION	4/18/2014	APPROVED BY:	SK	
REVISION	2/28/2015	Modified from GDC, 2014a		

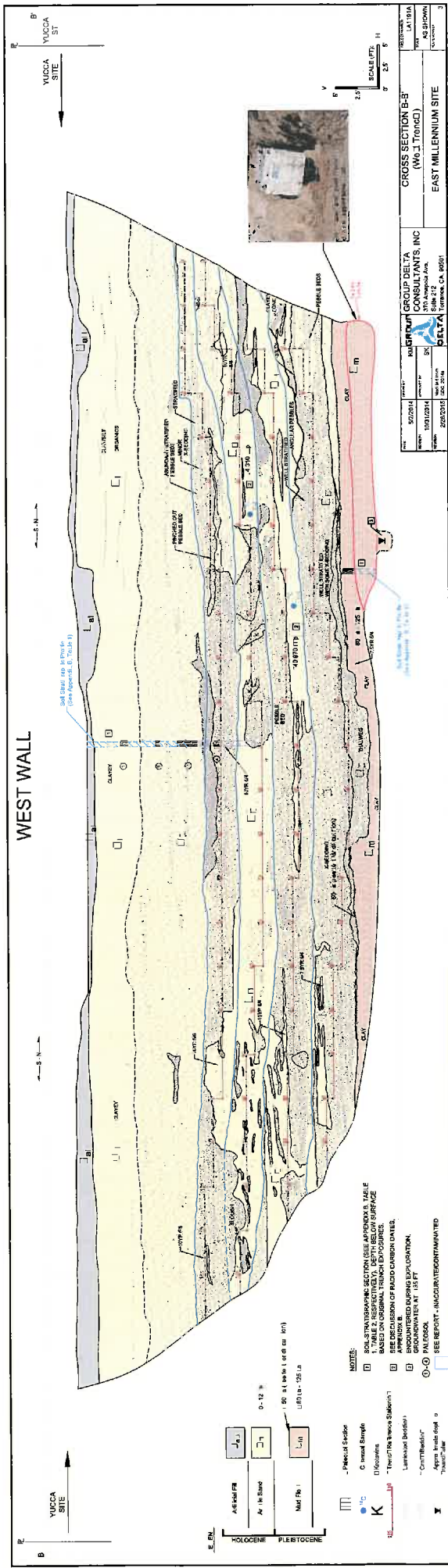


GROUP DELTA CONSULTANTS, INC
 370 Arapola Ave.
 Suite 212
 Torrance, CA. 90501

CROSS SECTION A-A'
(CPT/SOIL CORE)

EAST MILLENNIUM SITE

PROJECT NUMBER: LA-1191A
SCALE: AS SHOWN
PLATE NUMBER: 2



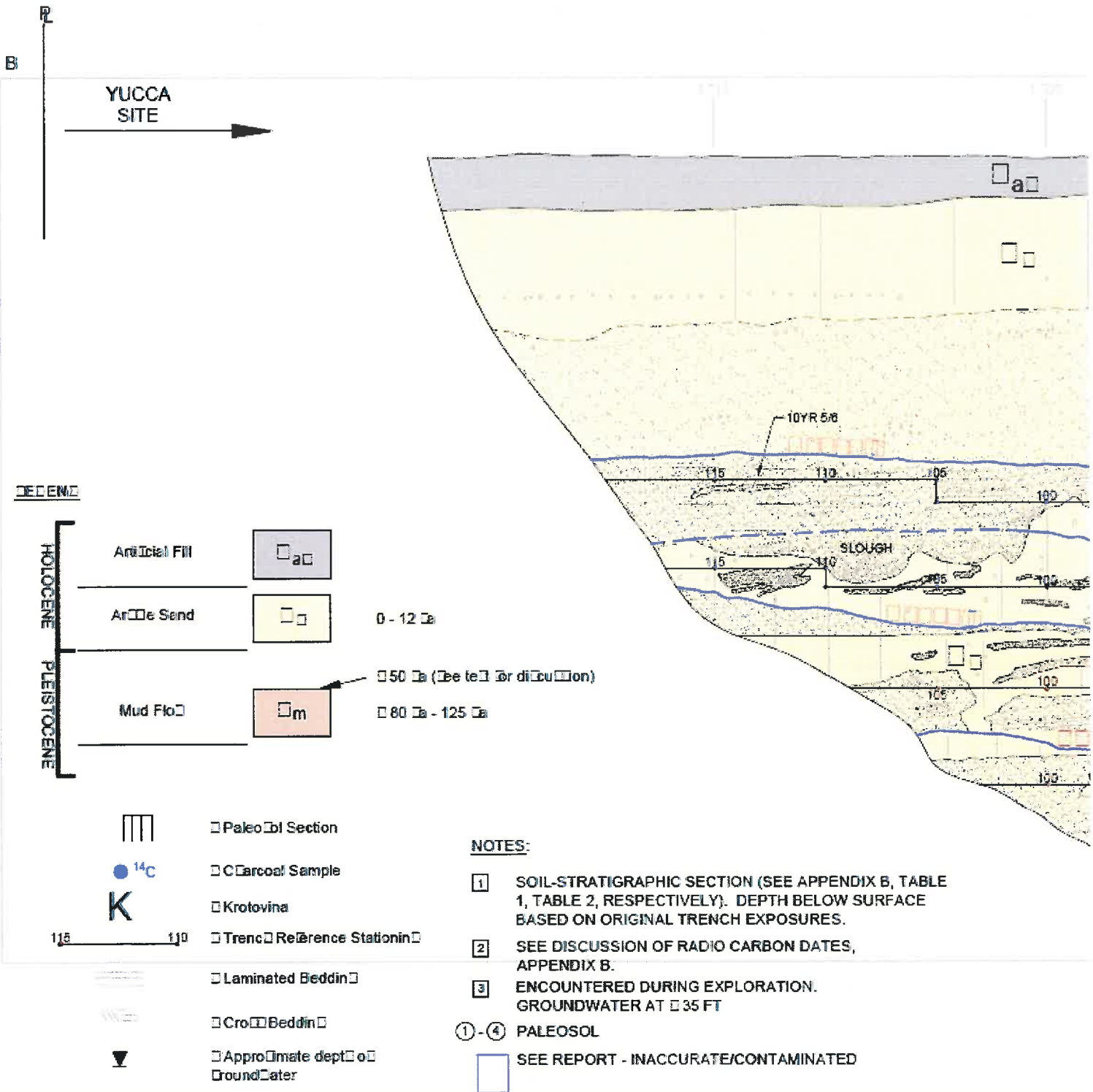
PROJECT	LA 191A
CLIENT	DELTA
DATE	02/20/14
SCALE	1" = 25.0'
PROJECT NO.	1501274
DATE	02/20/14
PROJECT	CROSS SECTION B-B'
CLIENT	(W-J TRENCO)
DATE	02/20/14
PROJECT	EAST MILLENNIUM SITE
CLIENT	DELTA
DATE	02/20/14

GROUP DELTA
 CONSULTANTS, INC.
 1501274
 2000010

SOIL STRATIGRAPHIC SECTION (SEE APPENDIX TABLE 1)
 BASED ON ORIGINAL TRENCH EXPOSURES.
 SEE DISCUSSION OF RADIO CARBON DATES.
 ENDANGERED DURING EXPLORATION.
 GROUNDWATER AT 15 FT
 "CONTAMINATED"
 "HARMFUL"

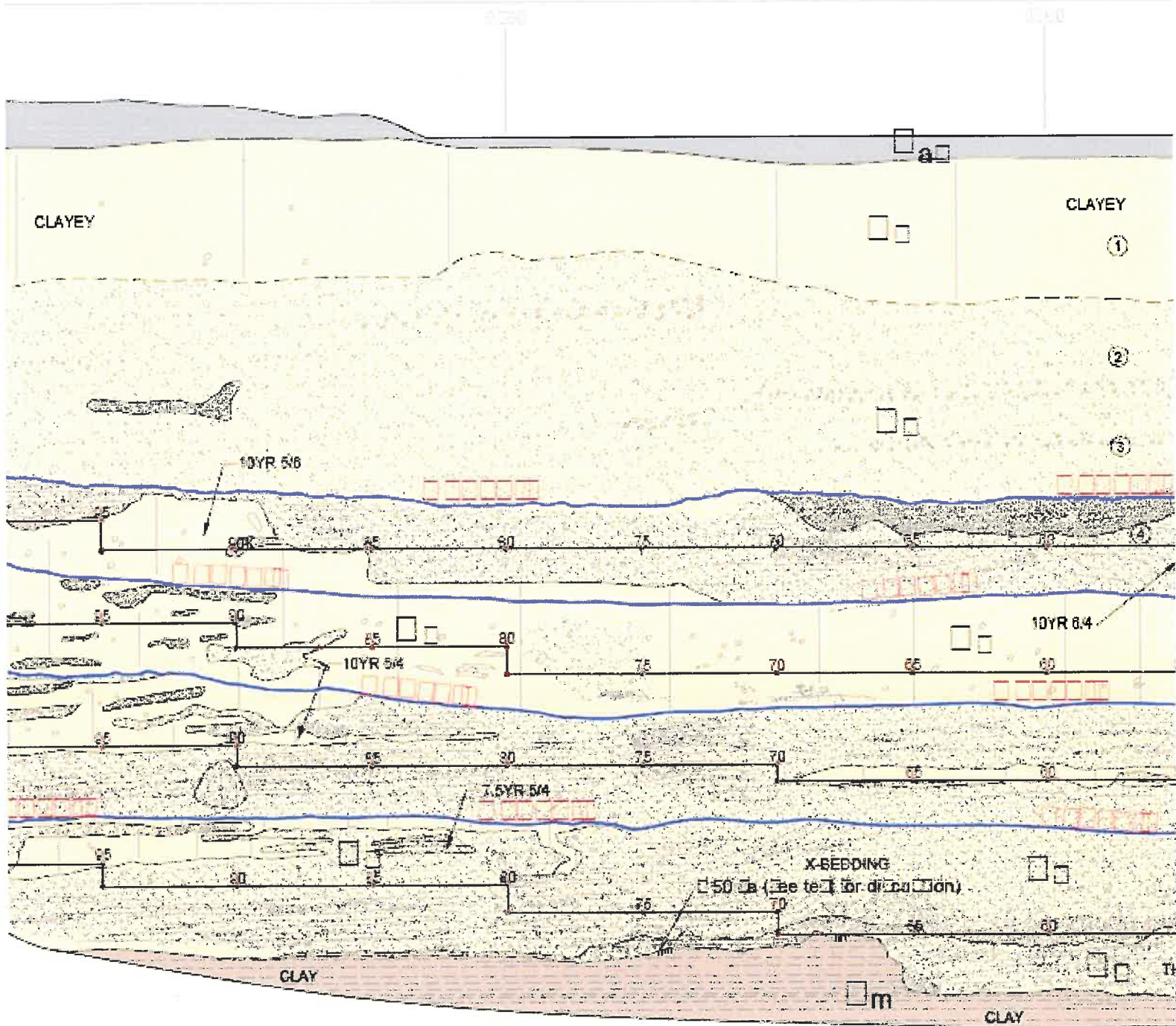
NOTES:
 SOIL STRATIGRAPHIC SECTION (SEE APPENDIX TABLE 1)
 BASED ON ORIGINAL TRENCH EXPOSURES.
 SEE DISCUSSION OF RADIO CARBON DATES.
 ENDANGERED DURING EXPLORATION.
 GROUNDWATER AT 15 FT
 "CONTAMINATED"
 "HARMFUL"

SOIL STRATIGRAPHIC SECTION (SEE APPENDIX TABLE 1)
 BASED ON ORIGINAL TRENCH EXPOSURES.
 SEE DISCUSSION OF RADIO CARBON DATES.
 ENDANGERED DURING EXPLORATION.
 GROUNDWATER AT 15 FT
 "CONTAMINATED"
 "HARMFUL"



WEST WAI

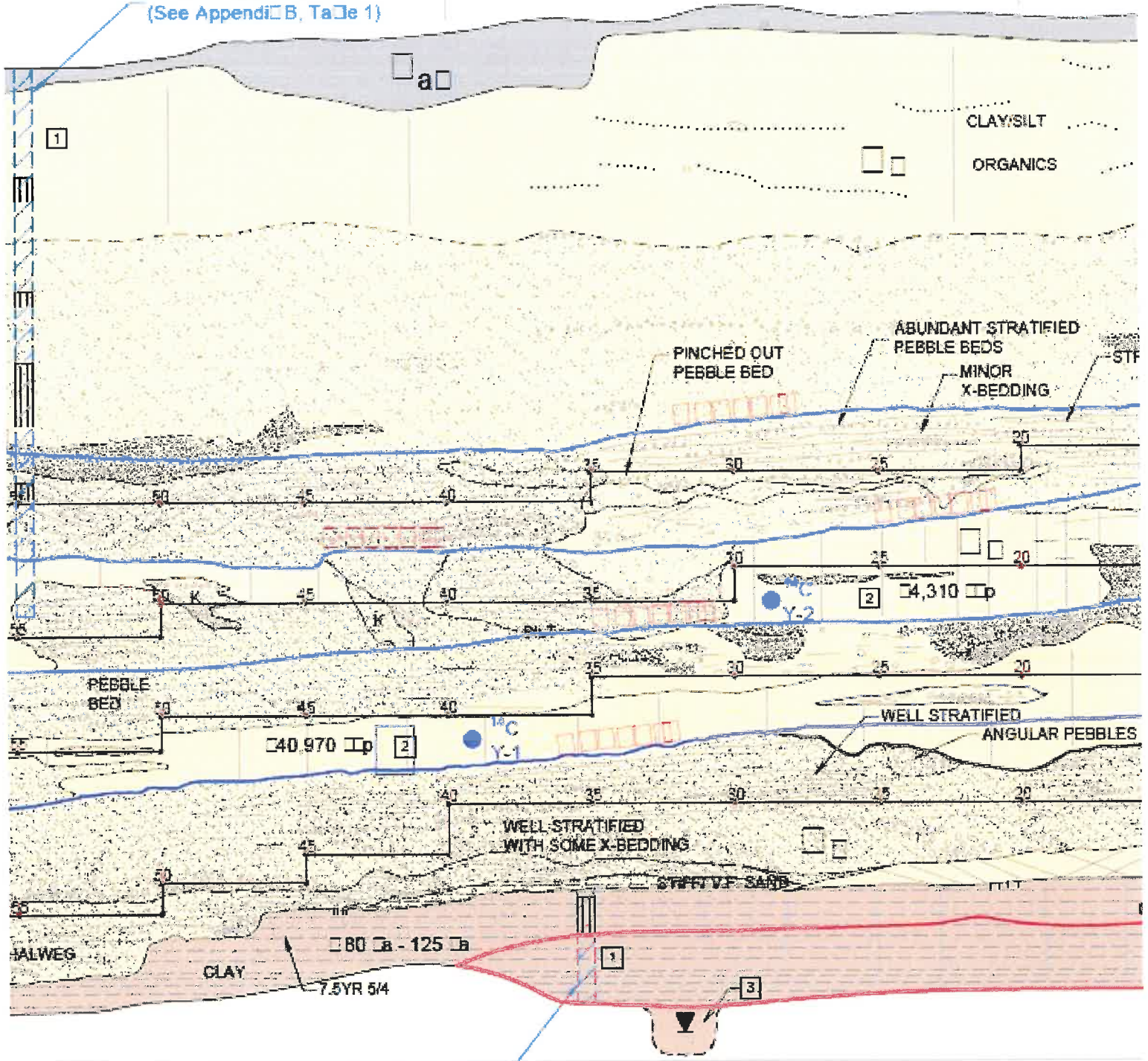
S - N



LL

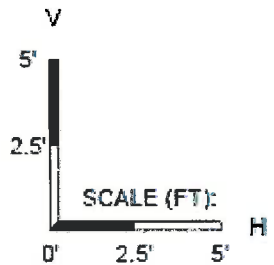
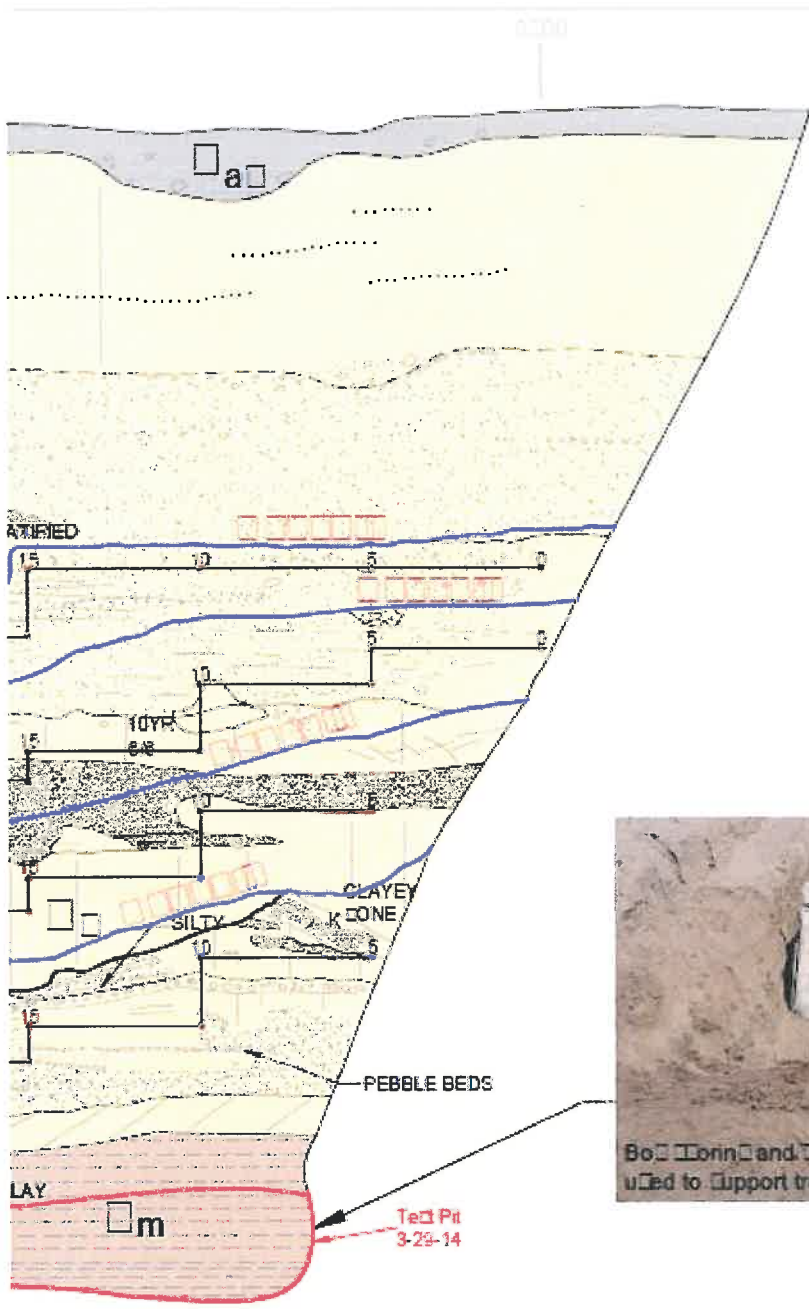
S-N

Soil Stratigraphic Profile
(See Appendix B, Table 1)



Soil Stratigraphic Profile
(See Appendix B, Table 2)

DATE:	5/2/2014
REVISION:	10/31/2014
REVISION:	2/28/2015



DRAWN BY: KM
 APPROVED BY: SK
 Modified from GDC, 2014a

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CROSS SECTION B-B'
 (Well Trench)

EAST MILLENNIUM SITE

PROJECT NUMBER:
 LA1191A
 SCALE:
 AS SHOWN
 PLATE NUMBER:
 3