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Cc: Naira Soghatyan <Naira@robertsilversteinlaw.com>; Veronica Lebron <Veronica@robertsilversteinlaw.com>
Subject: Objections to City's failure to provide a concurrent searchable admin record; Case No. ENV-2018-2116-EIR; SCH 2018051002

Dear Mr. Bertoni and Ms. Nguyen:

Please ensure that this communication is included in the administrative record for the Hollywood Center matter.

Upon review of the project's concurrently prepared administrative record, we see that the City is violating the Rules of Court and Public Resources Code requirements.

As an example, the records in the following links - including in the DEIR - were not searchable:

Agency Comments:

[https://planning.lacity.org/eir/HollywoodCenter/Deir/ELDP/\(H\)%20Remainder%20of%20Administrative%20Record/Agency%20Correspondence/Agency%20Correspondence%20on%20ENV-2018-2116-EIR/Agency%20Correspondence%20on%20ENV-2018-2116-EIR.htm](https://planning.lacity.org/eir/HollywoodCenter/Deir/ELDP/(H)%20Remainder%20of%20Administrative%20Record/Agency%20Correspondence/Agency%20Correspondence%20on%20ENV-2018-2116-EIR/Agency%20Correspondence%20on%20ENV-2018-2116-EIR.htm)

DEIR:

<https://planning.lacity.org/eir/HollywoodCenter/deir/Appendices/Apx%20A-4%20-%20NOP%20and%20Scoping%20Meeting%20Comments.pdf>

Pursuant to Pub. Res. Code Section 21186(d)-(f), the City must make any comment "available to the public in a readily accessible electronic format."

The quoted requirement stems from the general requirement in Pub. Res. Code Sec. 21186(a) stating: "The lead agency for the project shall prepare the record of proceedings pursuant to this division **concurrently with** the administrative process." (Emph. added.)

While CEQA does not define what the "readily accessible electronic format" for the administrative record is, such definition is provided by Rule of Court Rule 3.1367(a), requiring that the administrative record be in PDF format (subdivision (2)) and "**capable of full text searching**" (subdivision 5). (Emph. added.)

Not all documents in the Project's running administrative record are "capable of full text searching" -- in violation of Rule 3.1367(a)(5),

Besides these violations of CEQA and the Court Rules, the City's failure to provide a fully compliant administrative record concurrently with the administrative process is a major impediment for us and for the public to be apprised of the full contents of the administrative record, including to fully participate in the administrative process in a meaningful, timely and more fully informed manner.

We request that the City immediately correct these violations to ensure that the Project's entire administrative record is concurrently prepared in a readily accessible electronic format "**capable of full text searching**".

Please confirm that you will do so, and that all documents previously uploaded that are not yet full text searchable are immediately made so, and that all documents going forward similarly conform. Thank you.

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