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Subject: FOR PUBLIC RECORD: Comment for Hollywood Center Project Draft Environmental Impact Report; Case Number ENV-2018-2116-EIR
Attachments: Hollywood Center ENV-2018-2116-EIR.pdf

PLEASE REVIEW AND PRINT ATTACHED FOR ADMINISTRATIVE & PUBLIC RECORD.

Sincerely,

/s/ Milan Kalra

Harvard JD/MBA
Former Director of Strategic Planning, NYC

May 31, 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

Comment for Hollywood Center Project Draft Environmental Impact Report; Case Number ENV-2018-2116-EIR; State Clearinghouse Number 2018051002

Dear Ms. Nguyen and City Officials:

This letter and all materials contained in the links within this letter are to be included in the administrative record for the above-referenced matter.

The DEIR Executive Summary outlines various Alternatives explored in relation to this Project. ¹

Granting entitlement beyond what the zoning currently allows – 3: 1 FAR vs. the Project’s proposed 6.97 : 1 FAR, representing a 230% FAR increase, is grossly negligent and morally repugnant given the effect of density & air quality on respiratory illness and fatality in the pandemic & post-pandemic era.

Only Alternative 2 is conforming with the existing zoning and still with its proposed buildings at 18 and 14 stories respectively, represents greater magnitude than nearly all existing buildings in Hollywood.²

Even Alternative 5 addressing the Proposed Hollywood Community Plan is inappropriate and mercenary with its 4 buildings at 29, 20, and dual 7 stories each, allowing a 4.5 :1 FAR, with heights & density **exceeding all of current Hollywood.**² As the Coronavirus pandemic has & will continue to force us to reassess the dangers & lethality of a high-density urban plan, **approving any project beyond its current zoning allowance exceeds rational & prudent judgment by the City.**

Density & Air pollution largest risk factors for COVID-19 & other respiratory contagions:

Density

- “Density is New York City’s Big ‘Enemy’ in the Coronavirus Fight”³
- “New York is far more crowded than any other major city in the United States. It has 28,000 residents per square mile, while San Francisco, the next most jammed city, has 17,000, according to data from the U.S. Census Bureau.”³ **And yet, Hollywood, the site of the proposed megalithic project, has a density range of 23,870⁴ to 41,740⁵, grappling with a significantly greater risk factor for pandemic exposure, illness, & death even before this proposed development of unprecedented scale & density in Hollywood’s history.**
- Garcetti’s vision of “Manhattanizing”⁶ Hollywood is now dangerously lethal, with this mega density project further forcing subway & mass transit use that is being heavily cautioned against in NYC with massive shutdowns as primary pandemic mitigation measures. In fact, the CDC urges people to drive alone instead of taking public transit for the foreseeable future.⁷

Air Pollution

From Section IV. Air Quality of the DEIR⁸ (p.2), the risks & undeniable links to respiratory disease & lung damage of Ozone are clearly stated:

“According to the USEPA, ozone can cause the muscles in the airways to constrict potentially leading to wheezing and shortness of breath. Ozone can make it more difficult to breathe deeply and vigorously; cause shortness of breath and pain when taking a deep breath; cause coughing and sore or scratchy throat; inflame and damage the airways; aggravate lung diseases, such as asthma, emphysema, and chronic bronchitis; increase the frequency of asthma attacks; make the lungs more susceptible to infection; continue to damage the lungs even when the symptoms have disappeared; and cause chronic

obstructive pulmonary disease. Long-term exposure to ozone is linked to aggravation of asthma, and is likely to be one of many causes of asthma development and long-term exposures to higher concentrations of ozone may also be linked to permanent lung damage, such as abnormal lung development in children. According to the California Air Resources Board (CARB), inhalation of ozone causes inflammation and irritation of the tissues lining human airways, causing and worsening a variety of symptoms and exposure to ozone can reduce the volume of air that the lungs breathe in and cause shortness of breath.

Similar risks are outlined for NO_x on p. 3:

“VOCs are organic chemical compounds of carbon and are not “criteria” pollutants themselves; however, **they contribute with NO_x to form ozone**, and are regulated to prevent the formation of ozone. According to CARB, some VOCs are highly reactive and play a critical role in the formation of ozone, other VOCs have adverse health effects, and, in some cases, VOCs can be both highly reactive and have adverse health effects.”

And yet, the Project would violate both California state & National Ozone (O₃) standards of .09 ppm [1 hour] and .07 ppm [8 hour]. (p.11)

Even the very prejudiced thresholds SCAQMD developed that far exceed state & national guidelines would be violated, both during Construction of 4.5 years (2021-2025) & Operationally:

“As shown in Table IV.B-5, construction-related daily emissions **would exceed the SCAQMD thresholds of significance for NO_x** [emphasis] and emissions levels would [Not] be below the applicable thresholds of significance. Therefore, the Project’s or the Project with the East Site Hotel Option’s construction impacts would be potentially significant.” (p. 56)

“The operational-related daily emissions from the Project and the Project with the East Site Hotel Option **would exceed the SCAQMD thresholds of significance for NO_x** [emphasis] in year 2025. Therefore, operational impacts would be considered potentially significant.” (p.57)

The boiler plate mitigation measures to manipulate a summary assessment of ‘No Significant Impact’ are egregiously false & criminal in light of what we know regarding air pollution’s contribution to respiratory disease & markedly increased fatality:

“The Harvard study suggests lower pollution levels in the years before the pandemic could have resulted in a significant decrease in Covid-19 death rates.”⁹

“A US study suggests **Covid-19 death rates rise by about 15% in areas with even a small increase in fine-particle pollution levels** [emphasis] in the years before the pandemic.”⁹

“The Lombardy and Emilia Romagna regions had death rates of about 12%, compared with 4.5% in the rest of Italy. The study, published in Science Direct, says: “The high level of pollution in northern Italy should be considered an additional co-factor of the high level of lethality recorded in that area.”⁹

“**People with COVID-19 who live in U.S. regions with high levels of air pollution are more likely to die from the disease** than people who live in less polluted areas, according to a new nationwide study from Harvard T.H. Chan School of Public Health.”¹⁰

“The study found, for example, that someone who lives for decades in a county **with high levels of fine particulate pollution is 8%* more likely to die from COVID-19 than someone who lives in a region that has just one unit (one microgram per cubic meter) less of such pollution.** [emphasis]”¹⁰

“Research shows almost 80% of deaths across four countries were in most polluted regions”¹¹

“High levels of air pollution may be “one of the most important contributors” to deaths from Covid-19, according to research. The analysis shows that of the coronavirus deaths across 66 administrative regions in Italy, Spain, France

and Germany, **78% of them occurred in just five regions, and these were the most polluted [emphasis].**" 11

As documented in Table IV. B-2 (p. 25)⁸, **the area already is Non-Attainment – Extreme in violation of both California state (CAAQS) and National (NAAQS) standards.** The City's priority & focus must be at minimum sustaining, if not improving, air quality. **Allowing 4.5 years of this Project's non-compliant construction pollution that continues *indefinitely* through its operational phase is a documented danger & lethality to all of Hollywood's 146,000 residents.** Much of the project's net air quality analysis was predicated on the substantial substitution of mass transit for vehicular use, which in a post-pandemic age, is a dangerous & unsound premise. The resulting vehicular pollution from idling in clogged on and off ramps of the 101 freeway at Cahuenga/Wilcox, Vine St, and Argyle/Gower were well-demonstrated in CALTrans' condemning study of the pre-cursor Millenium project.

Further manipulated EIRs or boilerplate mitigation measures to yield a 'No Impact' or 'Less Than Significant Impact' assessment defy common sense & unprejudiced judgment. **The City must be liable for preventable illnesses & deaths from its position of pursuing such high-density projects and the granting of Entitlements that threaten public health during and after the COVID-19 crisis.**

To perpetuate & incite egregious density and forever degraded air quality, documented as leading contributors to respiratory death, is undeniably criminal & morally unconscionable in a post-pandemic age.

Sincerely,

/s/ Milan Kalra

Harvard JD/MBA

Former Director of Strategic Planning, NYC

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

Councilman Mitch O'Farrell (councilmember.ofarrell@lacity.org)

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1 <https://planning.lacity.org/eir/HollywoodCenter/deir/Draft%20EIR%20Sections/ES.%20Executive%20Summary.pdf>

2 https://en.wikipedia.org/wiki/List_of_tallest_buildings_in_Los_Angeles

1. Sunset Gordon (23 stories)
2. Comerica (22 stories)
3. Sunset Vine Tower (20 stories)
4. Argyle House (17 stories)
5. Kimpton Everly Hotel (16 stories)

3 <https://www.nytimes.com/2020/03/23/nyregion/coronavirus-nyc-crowds-density.html>

4 <https://statisticalatlas.com/neighborhood/California/Los-Angeles/Hollywood/Population>

5 Hollywood population 2019 = 146,510 / 3.51 square miles* = 41,740 residents / sq mile

*Zimas and <https://maps.latimes.com/neighborhoods/neighborhood/hollywood/>

6 <https://www.dailynews.com/2013/02/12/wendy-greuel-attacks-eric-garcetti-on-hollywood-development/>

7 https://www.nytimes.com/2020/05/28/health/cdc-coronavirus-offices.html?campaign_id=154&emc=edit_cb_20200529&instance_id=18946&nl=coronavirus-briefing®i_id=77954439&segment_id=29614&te=1&user_id=319bc4de

8 <https://planning.lacity.org/eir/HollywoodCenter/deir/Draft%20EIR%20Sections/IV.B%20Air%20Quality.pdf>

9 <https://www.bbc.com/news/health-52351290> Air pollution linked to raised Covid-19 death risk.

10 <https://www.hsph.harvard.edu/news/hsph-in-the-news/air-pollution-linked-with-higher-covid-19-death-rates/>

11 <https://www.theguardian.com/environment/2020/apr/20/air-pollution-may-be-key-contributor-to-covid-19-deaths-study>