

From: David Gadd <president@argylecivic.org>
Sent time: 06/01/2020 01:26:30 PM
To: Mindy Nguyen <mindy.nguyen@lacity.org>
Cc: councilmember.ofarrell@lacity.org; vince.bertoni@lacity.org; kevin.keller@lacity.org
Subject: Argyle Civic Association response to Hollywood Center DEIR Case No. ENV-2018-2116-EIR

Re: Response to Hollywood Center Project Draft Environmental Impact Report (“DEIR”); Case Number ENV-2018-2116-EIR; State Clearinghouse Number 2018051002

June 1, 2020

Dear Ms. Nguyen:

The Argyle Civic Association (ACA) is a non-profit neighborhood group representing residents of Argyle Avenue and surrounding and intersecting streets in Hollywood. As the neighborhood association covering the site of the proposed Hollywood Center project and areas immediately adjacent, *our group represents the demographic that will be most affected by the project.*

Our concerns about the Draft Environmental Impact Report (DEIR) are many, but in the astonishingly limited time of 45 days (in the middle of the COVID crisis) that was allotted to respond to this massive document (in spite of our request for an extension), we have limited our objections to these:

TRAFFIC

We take exception to the finding of “No Conflict” mentioned in Table IV:L-3 (which examines consistency of the project with applicable policies and programs of Mobility Plan 2035). Section 2.7 of this table states: “All existing roadways adjacent to the Project Site, including Yucca Street, Argyle Avenue, Ivar Avenue and Vine Street would continue to provide access to the regional freeway system, particularly US-101 located approximately 380 feet north of the Project Site, *similar to existing conditions.*” [emphasis added]

As our members know, the feeder streets to the Hollywood Freeway on-ramp at Argyle Avenue and Franklin Avenue, especially Argyle Avenue northbound and Franklin Avenue westbound, are often gridlocked at evening rush hour, not only causing massive delays for commuters trying to access the 101 Freeway to leave Hollywood, but also for local residents trying to access their own neighborhood streets north of Franklin.

Appendix N-1 (“Traffic Assessment”), pages 59-60, estimates the project will generate 4,931 total external trips (or 5,663 total external trips with the east site hotel option). *Nearly (or well over) 5,000 extra vehicle trips in and out of the project would add unbearable strain on surrounding streets which are already overburdened.* In particular, Argyle Avenue will see increased strain, because, as mentioned in the Traffic Assessment, “loading access to the East Site would also be provided via Argyle Avenue.”

Additionally, we are concerned about the placement of a new stop light at Argyle Avenue and Carlos to control access to the project (“The driveway [aligned with Carlos Avenue] would be signalized at Argyle Avenue & Carlos Avenue with a pedestrian crossing across Argyle Avenue, while the Ivar Street driveway and the Yucca Street driveway would be stop-controlled”). This new traffic signal would create yet another impediment to northbound traffic trying to access the Hollywood Freeway and the residential streets north of Franklin Avenue.

Far from being “similar to existing conditions” as asserted by the DEIR, access to the regional freeway system will be *far worse than existing conditions.*

We feel that further study of the effect of the project on the heavily congested intersection of Argyle Avenue and Franklin Avenue, which includes the busy 101 Freeway northbound on-ramp, is needed. In response to the former Millennium Project, Caltrans had strong concerns about project-induced traffic at ramp intersections, including this one, but these were excluded from the Hollywood Center project Traffic Assessment, as has been pointed out in a technical memorandum prepared by traffic consultancy KOA commissioned by The Oaks Homeowners Association (included with their response to the DEIR).

Has the project consulted with Caltrans and has Caltrans expressed an opinion on this matter? If so, why is no Caltrans correspondence available as an appendix (as is LADOT correspondence)?

PARKING

Parking near the project on the residential streets north of Franklin Avenue is notoriously difficult. We are particularly concerned with the projections (as stated in Appendix N-1) that only 25% of employees in the East Building and only 50% of those in the West Building will be “subject to priced parking.” In other words, 75% of employees in the East Building and 50% of those in the West Building will not be parking in the building.

Even assuming that some of those employees will walk, bicycle or take public transportation to work, *there will almost certainly be a significant number of them who will wind up parking north of Franklin* (where there are no hourly restriction and no permit parking) while at work, occupying parking spaces that are sorely needed by the residents of the neighborhood.

Has the project considered the impact on neighborhood parking north of Franklin Avenue? What measures, if any, does the project propose to mitigate this impact?

EARTHQUAKE AND SAFETY

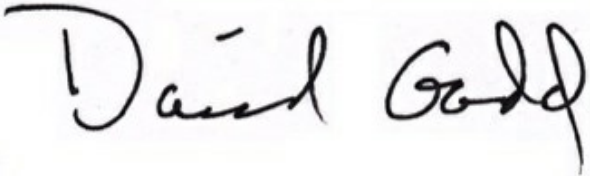
While the Argyle Civic Association does not currently have the technical expertise to address possible shortcomings or inaccuracies in the geological studies presented in Section VI:D of the DEIR as well as in Appendices G-1-4, we are very concerned about the bonafides of Millennium Partners, given their very public debacle with the “leaning” Millennium Tower in San Francisco.

How will the City of Los Angeles assure local residents that Millennium Partners will be held *entirely responsible* in the event of engineering flaws and/or structural inadequacies that result in one or both buildings of the Hollywood Center to become uninhabitable? Will Millennium Partners be responsible for the eventual demolition of the building(s) in the event they are rendered uninhabitable because of earthquake or other events?

Argyle Civic Association members are vested stakeholders in this part of Hollywood. We would like to have our concerns addressed by the Planning Department as soon as possible (within 45 days, please).

A printable Word document is attached for your files.

Sincerely,



David Gadd, President

president@argylecivic.org



PO BOX 1935, HOLLYWOOD CA 90078