

Director Ken Alex
Office of Planning and Research
Office of Governor Edmund G. Brown, Jr.
1400 10th Street
Sacramento, California 95814

Re: Opposition to Certification of the Hollywood Center Project
(aka Millennium), Application 2018051002 as an Environmental Leadership
Development Project.

Dear Mr. Alex:

Regarding the MCAF Vine LLC's (Millennium Partners) application to the Governor to certify the Hollywood Center Project – known as the Millennium – (Pub. Res. Code §2621 et seq.) I urge you to reject certification of this environmentally unsustainable and dangerous plan to build two skyscrapers atop and next to the Hollywood Earthquake fault, which has been formally identified and located by the California State Geologist.

The Project's proponent, Millennium Partners, is the developer who built the sinking Millennium Tower in San Francisco. This tower is now notorious around the world for its faulty construction planning, which led to the sinking and leaning of the residential skyscraper -- a rare event globally, or in modern times.

You should reject this application because:

It fails on the net greenhouse gas test:

A project seeking Environmental Leadership Development Project (ELDP) can't cause a net increase in GHG, and the applicant must include every feasible measure to reduce greenhouse gas emissions, such as requirements for Vehicle Mile Traveled. I urge California Air Resources Board (CARB) to recognize that every feasible GHG reduction has NOT been included to justify a purchase by the applicant of carbon credits. See Public Resources Code § 21183(TK).

It fails under requirements of AB 900:

Under AB 900, this request must be rejected in whole. The City of L.A. has proposed zone and height district changes for this Project, where carefully reasoned height restrictions apply to it and all other land in the area. A city's granting of zone and height changes IS a public subsidy that is widely recognized as helping a developer's financial bottom line.

It fails to protect human life as required by state law:

The applicant is not being honest in disclosing the risk of an earthquake. In violation of the Alquist-Priolo Earthquake Fault Zoning Act, these skyscrapers would place occupants on property identified by the State Geologist as underlaid by an active fault. L.A. Superior Court said, in its 2015 ruling to set aside approval of the applicant's previous version of Hollywood Center project (the Millennium), that the Alquist-Priolo Earthquake Fault Zoning Act **prohibits construction** of buildings for human occupancy that lay across traces of an active fault. The State Geologist, not the City of LA, is recognized globally in these matters. The OPR should not recommend, and the Governor should not certify as an Environmental Leadership project, a project the State's Geologist has officially found unsafe and non-compliant with Alquist-Priolo.

It fails on the real-world transportation efficiency test:

The project must create at least 15% more transportation efficiency than comparable projects. Here again, MCAF has completely failed. Its AB 900 application does NOT compare its proposed skyscrapers to real-life high-rises and contains ZERO analysis demonstrating it meets the 15% standard. It sets up a phony comparison to an imaginary "Comparable Residential Project." No. MCAF must present a verifiable baseline using actual residential and hotel projects of similar size and locale. The Governor's certification is required to compare this application to real world projects.

It fails on the local planning policies test:

The applicant wrongly claims the Project is consistent with City of Los Angeles planning goals, policies, and objectives. Proposed projects must be consistent with **existing zoning and general plan designations** before being certified as ELDP projects: it would need deviations including "a zone change to C2-SN, a Height District Change to remove the D Limitation." That's not consistent!

Sincerely,

Alexa A. Williams