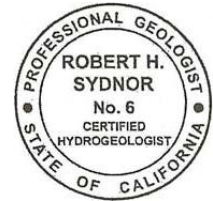


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September 1, 2020

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Subject: Engineering Geology Comments regarding:

Hollywood Center, *formerly known as:* Millennium high-rise development, located at 1720 North Vine Street, Hollywood district, City of Los Angeles. Vesting Tentative Tract 82152. Hollywood Center Project, Case No. ENV-2018-2116-EIR, SCH 2018051002.

Dear Mr. Bertoni, Ms. Nguyen, Mr. Schneidereit, and Mr. Bohlen:

References:

California Geological Survey letter-report dated **July 16, 2020**, Comments on the April 16, 2020, Draft Environmental Impact Report for the proposed "Hollywood Center" project, State Clearinghouse # 2018-051002, 7 pages.

Attorney Edgar Khalatian letter regarding Hollywood Center, dated **August 25, 2020**, 8 pages.

Los Angeles City Geologist Daniel Carl Schneidereit, PG 5158, CHG 329, CEG 1621; Letter dated August 7, 2020 to Los Angeles City Principal Planner Luciralia Ibarra, asking for **additional fault trenching** studies for the proposed Hollywood Center.

Dr. Rufus Catchings, Ph.D., and other geologists and geophysicists, May 8, 2020, **USGS-CGS fault-imaging surveys across the Hollywood and Santa Monica Faults, Los Angeles County**, USGS Open-File Report 2020-1049, 7 pages.

Robert Hadley Sydnor, CEG #968, two-page letter to the State Geologist dated July 11, 2013, urging the California Geological Survey to **officially zone the Hollywood Fault** as an **active fault** under provisions of the Alquist-Priolo Earthquake Fault Zoning Act. *(This was soon accomplished.)*

1. The **California Geological Survey** letter of July 16, 2020 is **excellent, competent, and well-prepared** by a senior-level team of experienced Certified Engineering Geologists. It is based on a number of data sets and reports, including **entirely new subsurface data from the United States Geological Survey** (USGS OFR 2020-1049, dated May 8, 2020, issued *after* release of the April 16, 2020 Draft EIR) that was *not* previously available to anyone. This new insightful subsurface data which indicated potentially four (4) fault traces crossing the proposed development site will help with accurate legal zonation of the Hollywood Fault; assist developers (present and future) to perceive the location(s) of active fault splays; and will help the Los Angeles City Geologist and City Planning to evaluate present (and future) Environmental Impact Reports for proposed development in Hollywood.

Because both the California Geological Survey's July 16, 2020 letter and the United States Geological Survey's May 8, 2020 report post-date the Draft EIR, and because both contain significant new and additional data or other information directly bearing on the current Draft EIR, a new Draft EIR must be circulated. Without this new information from two independent agencies (one state, and one federal) being included in a new Draft EIR, which information is uniquely pertinent to the precise property at issue in the Hollywood Center proposal, the current Draft EIR suffers from a fundamental inadequacy that precludes meaningful public and other agency review and comment.

2. **Guided geophysical waves along a fault plane** is a well-known, accepted, and state of the art method for discerning earthquake fault planes. The lead author, Dr. Rufus Catchings, is a Ph.D. geophysicist from Stanford University, with over three decades of public service at the U.S. Geological Survey, and dozens of peer-reviewed publications in national seismology journals. The U.S. Geological Survey is an expert and neutral scientific federal survey that is not for or against any development project. Their May 8, 2020 geophysical study identified several new splays of the known-active Hollywood Fault. This is highly pertinent to the proposed Hollywood Center and its Draft EIR because several north-dipping fault splays appear to intersect the project's planned high-rise foundations. This could "cause substantial adverse effects on human beings, either directly or indirectly" (CEQA Guidelines Section 15065(a)(4)), and also on the surrounding environment including to humans, other buildings, and streets and infrastructure if the proposed towers were to collapse due to seismic uplift or intense ground shaking.
3. The **Los Angeles City Geologist, Dan Schneiderei, C.E.G.**, has asked in writing on August 7, 2020 for **new fault trenching** by the developers of Hollywood Center, based on the California Geological Survey's July 16, 2020 comments and the new U.S. Geological Survey report dated May 8, 2020. This new phase of subsurface geology work will reportedly be soon underway, and most assuredly should be. It is strongly recommended that new fault investigation and trenching be performed by a highly qualified, neutral and independent firm that is not paid by, or connected to, either the developer or its affiliates, or the City of Los Angeles.

4. All parties should **patiently abide**; and await entirely **new field-data from subsurface fault trenching**. Final scholarly judgements should be based on latest subsurface geological data prepared by Certified Engineering Geologists; and not broadside emotional opinions as contained in the August 25, 2020 letter from Mr. Khalatian on behalf of the developer. All parties, the City of Los Angeles decision makers, and the general public will significantly benefit from new subsurface geological field data. After the fault trenching is officially completed, the **Draft EIR needs to be recirculated** by the Los Angeles Planning Department to incorporate the new and highly pertinent geologic subsurface data.

The new information from the California Geological Survey's comment letter and the United States Geological Survey's report show that a "substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance." (CEQA Guidelines Section 15088.5(a)(2).) They also show that feasible project alternatives or mitigation measures "considerably different from others previously analyzed [in the current Draft EIR – such as placing buildings off of and far enough away from any and all active fault lines –] would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it." (CEQA Guidelines Section 15088.5(a)(3).)


5. It is also suggested that the Los Angeles City Geologist **retain the U.S. Geological Survey geophysicists** to perform **additional guided-wave fault studies** in the Hollywood area, particularly on or at the West Site of the proposed project, but also more broadly. This new and reliable subsurface data will greatly assist with reliable zoning and planning by Los Angeles City Government.
6. In prior years, the author of this letter, Robert Hadley Sydnor, served on the **Grading Appeals Board of the City of Los Angeles**. For example, when the Los Angeles City Geologist did *not* approve a site grading permit and building permit for a new structure, the appeal was heard by the **expert and neutral** Grading Appeals Board composed *only* of state-licensed professionals. This was quite effective for all parties involved because it **removed politics from the decision-making process**. I was then the elected chairman of the Southern California Section of the Association of Engineering Geologists; and was concurrently Orange County Geologist. I was a neutral expert in fault studies and engineering geology consulting work (high-rise buildings, hospitals, public schools, nuclear power plants, hydraulic dams, natural-gas transmission pipelines, and residential tracts.)

It is recommended that the **Los Angeles City Geologist consider reconvening the Grading Appeals Board** for the City of Los Angeles; and use it to decide complicated projects. This would help **remove politics** from the decision-making process and **keep geological science in the forefront** (*as it should be*). I note that several members of the Los Angeles City Council have recently pleaded guilty to or have been arrested for corruption and extortion. Others have recently been criminally indicted regarding zoning and building permits.

Alternatively, a committee of neutral, independent and highly qualified experts should be chosen in a transparent process that the public can repose confidence in, who would then establish the parameters for the additional trenching that has been recommended, and with which I concur. Those parameters should include the length, depth, location(s) and extent of the new trenching, as well as not only permit, but encourage independent scientists, including from the California Geological Survey and the United States Geological Survey, to be given unfettered access and cooperation. Science, facts, public safety, and public disclosure must be the paramount goals. It is this author's opinion that only new trenching as part of the Draft EIR process can provide that.

7. For the record, this letter was prepared *pro-bono* for seismic safety of the public; there was no compensation for it by any party. The author is neutral with significant professional geologic credentials (*as shown above and below*). The names of professional societies are for identification purposes only; no society endorsement is implied.

Respectfully submitted,



Robert Hadley Sydnor

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California Certified Hydrogeologist #6

California Certified Engineering Geologist #968

AIPG Certified Professional Geologist #4496

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Life Member, California Academy of Sciences

Life Member, Seismological Society of America

Life Member, Association of Engineering Geologists

and former *elected Chairman* of Southern California Section of AEG

and former AEG National Board of Directors

Life Member, American Geophysical Union

Life Member, American Association for the Advancement of Science

(*AAAS is the world's largest scientific body*)

Senior Member, American Society of Civil Engineers

Senior Member, American Association of Petroleum Geologists

Senior Member, American Association of Professional Geologists

Member, Earthquake Engineering Research Institute

27-year *Member (retired)*, Examination Committee of the California State

State Board of Registration for Engineers, Surveyors, and Geologists; and

Expert Witness in Court for the California State Attorney General

about geology licensure discipline and license revocation