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August 23, 2020

By Email Only to mindy.nguyen@lacity.org

Mindy Nguyen, City Planner
City of Los Angeles Dept. of City Planning
221 N. Figueroa St., Suite 1350
Los Angeles, CA 90012

RE: Hollywood Center Project — OPPOSE
Case Nos.: VTT-82152; CPC-2018-2114-DB-CU-MCUP-
SPR; CPC-2018-2115-DA; ENV-2018-2116-EIR

Dear Ms. Nguyen:

The Federation of Hillside and Canyon Associations, Inc., founded in 1952, represents 44 homeowner and resident associations with approximately 250,000 constituents spanning the Santa Monica Mountains. The Hillside Federation previously submitted general comments regarding the Hollywood Center project's Draft EIR and the City's refusal to provide interested members of the public a sufficient opportunity to review the extremely lengthy environmental review document before closing the public comment period. At its meeting of July 21, 2020, the Hillside Federation voted to oppose the project, and we now write to voice our strong opposition.

We also write to object to the City's outrageous and prejudicial public process in moving forward with the joint DAA / hearing officer hearing despite the Final EIR not being published. As the staff recommendation report for the vesting tentative tract map case notes, the Final EIR has been held to address a late-submitted letter from the California Geological Survey (CGS). (VTT 82152 Recommendation Report, p. 29.) Due to the Final EIR not being complete the staff recommendation is to place consideration of the project under advisement, pending release of the Final EIR. (*Ibid.*, p. 10.)

The CGS letter is not some minor or technical land use issue, it relates to a matter of significant public safety. The letter reports to the City that on May 8, 2020, the United States Geological Survey "issued a new, peer-reviewed analysis of the Hollywood Fault zone in the immediate area of [the project]." The peer-reviewed analysis found: (1) new earthquake traces not identified in the existing environmental document's appendix G, (2) that it is highly likely that an active fault strand crosses the project site, and (3) that neither the 2014 earthquake trench nor other investigative

Argyle Civic Assn.
Beachwood Canyon NA
Bel-Air Assn.
Bel-Air Hills Assn.
Bel Air Knolls Property Owners
Bel Air Skycrest Property Owners
Benedict Canyon Association
Brentwood Hills Homeowners
Brentwood Residents Coalition
Cahuenga Pass Property Owners
Canyon Back Alliance
Crests Neighborhood Assn.
Dixie Canyon Assn.
Doheny-Sunset Plaza NA
Franklin Ave./Hollywood Bl. West
Franklin Hills Residents Assn.
Highlands Owners Assn.
Hollywood Dell Civic Assn.
Hollywood Heights Assn.
Holmby Hills Homeowners Assn.
Kagel Canyon Civic Assn.
Lake Hollywood HOA
Laurel Canyon Assn.
LFIA (Los Feliz)
Mt. Olympus Property Owners
Mt. Washington Homeowners All.
Nichols Canyon NA
N. Beverly Dr./Franklin Canyon
Oak Forest Canyon HOA
Oaks Homeowners Assn.
Outpost Estates HOA
Residents of Beverly Glen
Save Coldwater Canyon!
Shadow Hills POA
Sherman Oaks HOA
Silver Lake Heritage Trust
Studio City Residents Assn.
Sunset Hills HOA
Tarzana POA
Torreyson Flynn Assn.
Upper Mandeville Canyon Assn.
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techniques are adequate to clear the project site of active faults. (Sr. Eng. Geologist Hernandez/ Sup. Eng. Geologist McCrink, CGS, project comment letter to Mindy Nyugen, July 16, 2020.) In light of the extremely serious nature of the CGS findings, an additional exploratory trench is being required by the Los Angeles Department of Building and Safety. (Recommendation Report, p. 32.)

It is unconscionable that the City would even consider moving forward with public hearings for this project before the entire environmental record is complete. Doing so robs members of the public of the ability to make meaningful comment on the project and evinces the City's clear intention to approve the project once it feels it has the minimum legally adequate cover to do so. This is assuredly not the CEQA process envisioned by California's legislature or courts "to demonstrate to the public that it is being protected." (*See* 14 Cal. Code of Regs. § 15003, citing leading CEQA cases.) The City's citizens are right to be extremely apprehensive about this project. As Councilmember David Ryu recently expressed in a public email following publication of the CGS letter regarding the USGS earthquake trace analysis:

I and my constituents are left with uncertainty, not only about the safety of the proposed future project, but also the current safety of existing buildings in the area. As I understand it, if the site has an active fault strand on it, it may not be possible for any future building at the site to ever be safe to build, no matter how sophisticated the engineering.

The Hillside Federation urges the City to recirculate the Draft EIR with the revised geological information once the additional study required by LADBS has been completed, and to postpone any further public hearings on the project until those steps have been taken. If the City determines it will move forward with the hearing, the Hillside Federation urges the DAA to deny the tract map, and expresses to the hearing officer its strong opposition to the project based on our previous public comments as well as those of our member organizations and their constituents and other project objectors.

Sincerely,



Charley Mims
President, Federation of Hillside and Canyon Associations

Cc (by email only):

Vincent Bertoni, Director of Planning
Michael N. Feuer, City Attorney
Councilmember Mitch O'Farrell, Council District 13
Councilmember David Ryu, Council District 4