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July 12, 2013

Subject: **Millennium Hollywood Project**, State Clearinghouse # SCH 2011041094
39-story and 35-story high-rise buildings, City of Los Angeles, EIR Review Phase

Dear Dr. Parrish:

I have been asked to review engineering geology and seismology documents related to a huge project in Hollywood known as the Millennium Hollywood Project that would involve the construction of approximately 1.1 million square feet of space for human occupancy, including two towers of 39 and 35 stories. There is considerable opposition to this project based on seismic safety and active faulting on the Hollywood Fault. Caltrans has firmly opposed the project based on serious mistakes in transportation and infrastructure planning. The Silverstein Law Firm in Pasadena has compiled a 521-page legal document that summarizes the community objections, including pertinent extracts of the geology reports. The project and its Environmental Impact Report are scheduled to be approved by the Los Angeles City Council on July 24, 2013. Therefore, time is of the essence.

It is my belief that the California Geological Survey can perform a valuable public service by scientifically reviewing this EIR, and the May and November 2012 engineering geology reports by Langan Engineering of Irvine, California. The Langan reports appear inadequate and substandard, with significant mistakes in evaluation of active faulting and strong-motion seismology. This conclusion was independently arrived at by Kenneth L. Wilson, Certified Engineering Geologist #928 of Wilson Geosciences. I have read Wilson's written comments and concur with him. Likewise, Dr. James Dolan, professor of geology at the University of Southern California, has significant reservations about the adequacy of the Langan geology reports. Professor Dolan is a published author on the Hollywood Fault (1995, 1997, 2000). Reference is also made to the 2007 Community Fault Model, the 2010 Active Fault Map of the California Geological Survey, and CGS Special Publication 42. In my opinion, and the other experts who have reviewed the reports, it is critical that before any approval by the Los Angeles City Council, more time is needed for a rigorous and comprehensive review by *neutral* licensed experts in engineering geology and seismology.

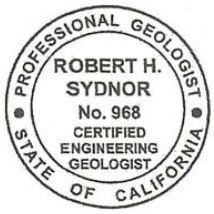
Please note that I have not been paid for my opinion and involvement in this matter, and I have not been offered any type of compensation. I provide my views solely in furtherance of the interests of public safety and the integrity of the scientific process, both of which, unfortunately, appear to have been severely compromised to date in the City's review of the Millennium Hollywood project. For several years, I formerly served on the City of Los Angeles Grading Appeals Board (while I was then Orange County Geologist), and am considered a neutral expert in evaluation of geologic hazards in and for the City of Los Angeles on large complicated projects. In that context, I recommend that the California Geological Survey perform a careful review of the seismic safety issues for the Millennium Hollywood Project. It would be prudent for the City of Los Angeles to convene a neutral-expert panel of engineering geologists and seismologists to review this particular project.

The California Geological Survey is empowered under Government Code Section 8871(c) and Title 14 to perform these kinds of EIR reviews and reviews of the supporting technical documents in engineering geology and seismology. During my 25 years with C.G.S., I performed hundreds of these reviews on a state-wide basis for 58 counties and 482 cities.

The principal seismic safety issues appear to be proximity of active surface faulting and strong-motion seismology, with scaled earthquake time-histories for high-rise buildings, including near-field effects (seismic focusing) from an oblique thrust fault, plus robust long-period ground-motion that adversely affects high-rise buildings from a Mw≳8 earthquake at intermediate distances. Active faults are mapped through the site, and that proximity is the immediate concern. The fault zones delineated in 1996 by the City of Los Angeles need to be accurately plotted in competent consulting geology reports for the Millennium Hollywood project. It is my professional opinion that the Langan Engineering data and analyses submitted for the project are incomplete, misleading and substantially below professional standards. If I can be of assistance to your office in any manner, please do not hesitate to contact me.

Respectfully submitted,

Robert H. Sydnor



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