

From: Khalatian, Edgar <EKhalatian@mayerbrown.com>
Sent time: 10/05/2020 10:34:22 AM
To: cpc@lacity.org
Cc: Craig Bullock <craig.bullock@lacity.org>; Luci Ibarra <luciralia.ibarra@lacity.org>; Mindy Nguyen <Mindy.nguyen@lacity.org>
Subject: Hollywood Center Project - VTT-82152; CPC-2018-2114-DB-CU-MCUP-SPR; CPC-2018-2115-DA; and ENV-2018-2116-EIR [MB-AME.FID1683707]
Attachments: Hollywood Center - AMDA Appeal.pdf Hollywood Center re CGS Letter.pdf

Please see attached correspondence re the aforementioned project, which is scheduled to be heard by the City Planning Commission on October 15, 2020.

Please ensure that these documents are made a part of the administrative record.

Edgar Khalatian

Partner

Mayer Brown LLP
350 South Grand Avenue, 25th Floor
Los Angeles, CA 90071-1503 United States of America
213-229-9548
ekhalatian@mayerbrown.com



Please consider the environment before printing this e-mail. If you need to print it, please consider printing it double-sided.

This email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager. If you are not the named addressee you should not disseminate, distribute or copy this e-mail.

Mayer Brown is a global services provider comprising an association of legal practices that are separate entities, including Mayer Brown LLP (Illinois, USA), Mayer Brown International LLP (England), Mayer Brown (a Hong Kong partnership) and Tauil & Chequer Advogados (a Brazilian partnership).

Information about how we handle personal information is available in our [Privacy Notice](#).



Mayer Brown LLP
350 South Grand Avenue
25th Floor
Los Angeles, CA 90071-1503
United States of America

T: +1 213 229 9500
F: +1 213 625 0248

mayerbrown.com

Edgar Khalatian
Partner

T: +1 213 229 9548
F: +1 213 576 8130

EKhalatian@mayerbrown.com

October 5, 2020

BY EMAIL

City Planning Commission
City of Los Angeles
200 North Spring Street, Room 272
Los Angeles, CA 90012

Re: Hollywood Center Project - VTT-82152; CPC-2018-2114-DB-CU-MCUP-SPR; CPC-2018-2115-DA; and ENV-2018-2116-EIR

Dear Members of the City Planning Commission:

On behalf of the applicant for the aforementioned matter, we submit this letter in response to an appeal filed by AMDA, which owns and leases property adjacent to the project site.

While we have had numerous conversations with AMDA in an effort to address their concerns, the parties have been unable to agree on a dollar amount that would satisfy AMDA’s specious issues.

Earlier this year we learned that AMDA itself had began a vetting process for a development partner for its own property, which we understand has now been narrowed to a short list. AMDA’s RFI/RFQ is attached for your information. Concomitant with that process, we have also learned that AMDA’s representatives have recently met with your planning staff to vet the feasibility of their proposal.

As part of AMDA’s appeal, AMDA raises concerns about noise impacts that our project will cause during construction. Seems somewhat disingenuous given their own plans and the proximity of their own development to the Menorah senior affordable community that will be living across the street from their significant proposed project. The same might be said for their misleading claim about serious public health problems or their suggestion of pedestrian safety at Yucca and Vine.

There’s something to be said for the old proverb about people who live in glass houses should not throw stones.

Mayer Brown LLP

City Planning Commission

October 5, 2020

Page 2

Below is a sample massing scenario with corresponding development envelope copied from the AMDA RFI/RFQ.

Sample Massing Scenario

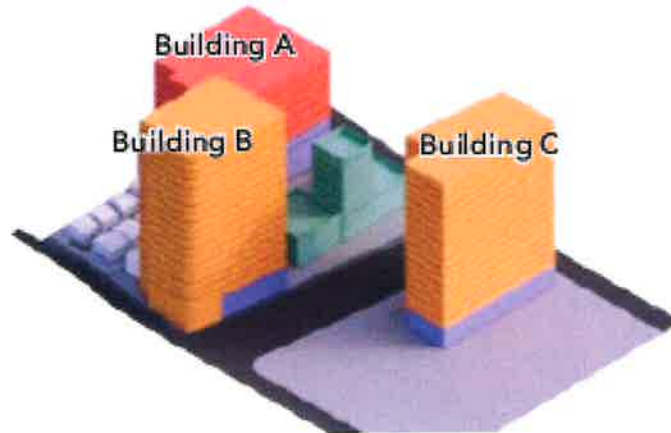


Table 4: Sample Massing Scenario

	Total (GSF)	AMDA (GSF)	Non-AMDA (GSF)
Building A	119,200	119,200	--
Building B	351,700	93,000	258,700
Building C	258,700	--	258,700
Yucca Tower	35,500	35,500	--
Bungalows	6,000	6,000	--
Total	771,100	253,700	517,400

Thanks, and we are happy to address any questions.

Sincerely,

Edgar Khalatian
Partner

Att.



AMDA LOS ANGELES

Hollywood Redevelopment Opportunity

Request for Expressions of Interest/Qualifications

Los Angeles, CA
Issued: June 26, 2020



RFEI / RFQ Timeline

Issue date: Friday, June 26, 2020

Intent to respond: Friday, July 3, 2020

Please notify via email to slin@u3advisors.com your intent to respond to this RFEI. Please also include any requests to schedule a virtual or in-person site tour.

Virtual or in-person site tours available:

June 29 - July 3, and July 6-10

Deadline to submit questions:

Friday, July 17, 2020

Answers will be distributed by Friday, July 24

Due date: Friday, July 31, 2020

For all questions, please contact:

Stephany Lin, U3 Advisors

(703) 727-0847

slin@u3advisors.com



Table of Contents

- Section 1** | Introduction..... 4
- Section 2** | Project Context.....5
- Section 3** | Site Description.....9
- Section 4** | Submission Requirements.....13

- Appendices:**
 - A - Site Analysis..... 17
 - B - Parcel Maps..... 21
 - C - Zoning 23
 - D - AMDA LA Facilities Map..... 28



[1] EXECUTIVE SUMMARY

PROJECT OVERVIEW

AMDA College of the Performing Arts is a not-for-profit 501(c)3 institution devoted to performing arts in higher education. We are seeking a partner for a redevelopment opportunity on our campus, located in the heart of Hollywood, Los Angeles. The development partner is expected to deliver private residential and/or commercial development on a portion of the site, which will generate proceeds to support construction of new, state-of-the-art academic and performance facilities for AMDA. The purpose of this development is to serve AMDA's current institutional growth and mission, serving our next generations of national and international performing artists.

VISION

AMDA College of the Performing Arts is one of the country's premier college conservatories for performing arts, offering multiple programs including acting, musical theatre, and dance theatre. Founded in New York City in 1964, we opened our Los Angeles campus in 2003 and became the only Bachelor of Fine Arts degree-granting performing arts college with campuses in both New York City and Los Angeles. The combination of AMDA's extraordinary locations at the two epicenters of the world's entertainment industries in Hollywood and Manhattan, faculty who

are actually professionals in the industry, and our uniquely professional-oriented degree programs, attract students from every state in the nation and from dozens of countries all over the world. AMDA is so very proud of our extraordinary alumni, whose careers span Broadway, national and international theatre, network and streaming television, feature film and the music industry.

For over 15 years, AMDA's Yucca St. campus has been a major influence in the revitalization of the Hollywood neighborhood we call home. Bringing over 1,000 talented students into Hollywood every year and employing hundreds of industry professionals, we significantly contribute to the energy and vitality of the neighborhood. Our dynamic community creates a powerful environment which directly contributes to the entertainment industry and serves as a catalyst for strong growth in the neighborhood. This new chapter of development will continue our trajectory of further elevating Hollywood.

We are looking for a partner - who will of course be a financial partner - but who will also share our vision for the continued development and improvement of Hollywood. We are open to creative financial and development options.

Looking ahead to our next decades of growth, AMDA's leadership continues to plan and implement

our dynamic vision to redevelop our Los Angeles campus - recognizing that reinvesting in the campus will further define the institution's identity and path for the decades to come, while also deepening our role in the city and performing arts industry at large.

RFEI/RFP PROCESS

This RFEI is being distributed to a select group of developers. AMDA and our real estate consultant, U3 Advisors (U3) will share preliminary concepts of the design and terms of the development in this document. In addition, the process will include site visits, meetings, and Q&A.

Upon receipt of responses, AMDA will evaluate the qualifications, interest, and experience of the developer candidates and will conduct interviews with selected, qualified candidates. The purposes of these interviews will be to engage in dialogue both from a perspective of information exchange and to explore the potential of the partnership on all levels.

Qualified candidates will have demonstrated expertise in residential, commercial, and/or mixed-use urban development. AMDA will evaluate responses based on the following criteria:

- Preliminary proposed process and approach
- Team organization and capabilities
- Key personnel experience and capacity
- Overall financial strength and capacity of the team

AMDA anticipates that the next step after this process will be to send a more comprehensive Request for Proposals (RFP) to select developers.

[2] PROJECT CONTEXT

ABOUT AMDA-LA

Since we opened our doors in Hollywood in 2003, our trajectory of enrollment has continued to meet and exceed our projections. AMDA is viewed as a transformational leader in performing arts education. Students are drawn to our unique model, which features a wide array of performance opportunities beginning in the students' very first semester. In the



academic year 2019/2020, AMDA-LA enrolled a total of 900 students, its highest-ever enrollment figure. Our multiple Bachelor of Fine Arts degree programs are the primary focus of the LA campus. Notably, AMDA is already in the process of expanding the breadth of curricular offerings to include unique Master of Fine Arts, Master of Arts, and additional Bachelor of Arts degree programs. In addition, AMDA's highly popular high school summer program draws students from across the United States and several other countries each year, providing a consistent pipeline of enrollment into the college.

The nationally acclaimed Playbill magazine, which represents the Broadway profession, has consistently ranked AMDA among the top 10 colleges with the most alumni on Broadway.

While COVID-19 impacted AMDA’s operations with a transition to remote learning this Spring 2020, AMDA is well-prepared to continue to adapt and is confident that our future enrollment will remain strong. Because of our unique model within the higher education landscape, AMDA consistently attracts students from across the country and around the world who are seeking a performing arts focus in the heart of Hollywood and New York City. In the Spring 2020 semester, 85% of students elected to continue coursework when instruction went online in response to the pandemic - showing AMDA’s institutional strength and stability.

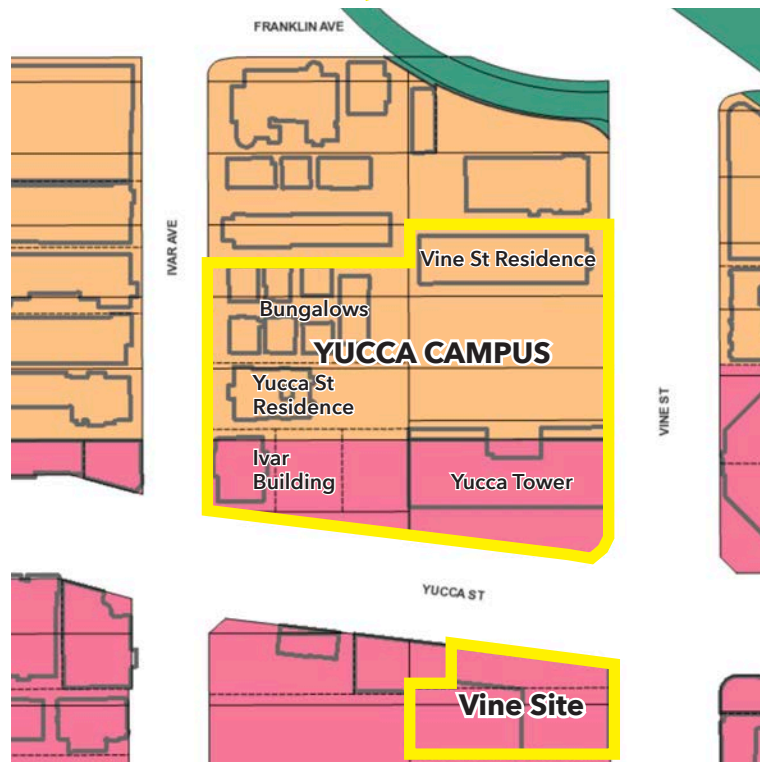
SITE OPPORTUNITY

The LA campus is situated in the heart of Hollywood, in one of the most sought-after real estate markets

in Los Angeles today. The campus consists of eight contiguous parcels totaling about 2.2 acres (the “Yucca Campus”) bound by Yucca St, Vine St, Ivar St, and Franklin Ave, as well as a ninth parcel totaling 15,660 square feet (the “Vine Site.”) AMDA currently estimates the combined sites allow for approximately 771,000 square feet of total floor area. AMDA also owns and leases several other properties in the vicinity for additional office use, performance facilities, and student residence halls. (See Appendix D.)

Located just one block north of the Hollywood and Vine intersection, this site enjoys close proximity to some of Hollywood’s most significant landmarks, sitting directly adjacent to the iconic Capitol Records tower and a short walking distance to the Pantages Theatre, with views directly looking towards the Hollywood sign itself. The site is less than a five-

Yucca Campus and Vine Site



Source: ZIMAS

minute walk from the Hollywood/Vine Metro Station, as well as adjacent to the 101 Freeway.

Major entertainment industry employers, including Netflix, Viacom, and Paramount Studios, have invested heavily in nearby new offices and studios, providing a significant employment center for the city and region. Hollywood has seen equally noteworthy investments in Class A residential, hospitality, and retail developments, such as the Kimpton Everly, the W Hollywood, Argyle House, and Columbia Square, as well as other high-profile projects planned or underway like Academy on Vine, Hollywood Center, the Palladium Residences, etc., among many others.

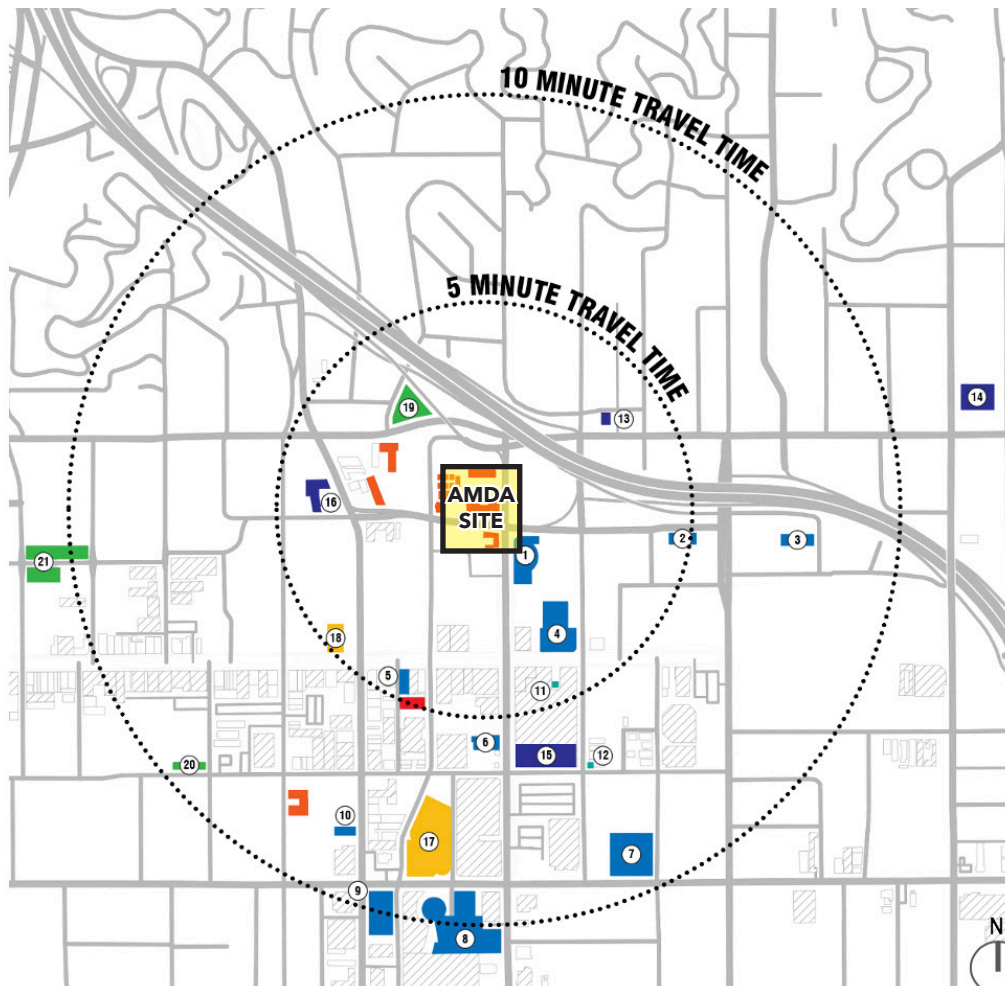
PROJECT GOALS

AMDA looks forward to being able to develop, build and offer state-of-the-art classrooms and performing arts spaces to our students and faculty. Currently, AMDA operates with too few classrooms, studios,

and performance spaces for our needs. Our goals for this redevelopment are to:

- Provide highly functional performance and academic space for our students and faculty to thrive.
- Maintain a secure campus environment for student safety.
- Maximize campus opportunities for events and student gatherings through thoughtful site planning.
- Incorporate sustainability features highlighting both environmental health and students' health and wellness.
- Offer an iconic destination in Hollywood that showcases AMDA and its students.
- Maintain the land as a long-term asset.
- Maximize value of the site in order to offset the cost to construct AMDA's desired space and specifications.

Hollywood Context



CULTURAL VENUES

1. Capitol Records
2. Beachwood Theatre
3. Actor's Co-Op Theatre Company
4. Hollywood Pantages Theatre
5. King Ten Theatre
6. The Montalban
7. Hollywood Palladium
8. Arclight Cinema
9. Amoeba Music
10. Theatre of Note

TRANSIT

11. Hollywood/Vine Metro Station
12. LAX Flyaway Shuttle Stop

GROCERIES

13. Hollywood Supermarket
14. Gelson's Market
15. Trader Joe's
16. Yucca Supermarket

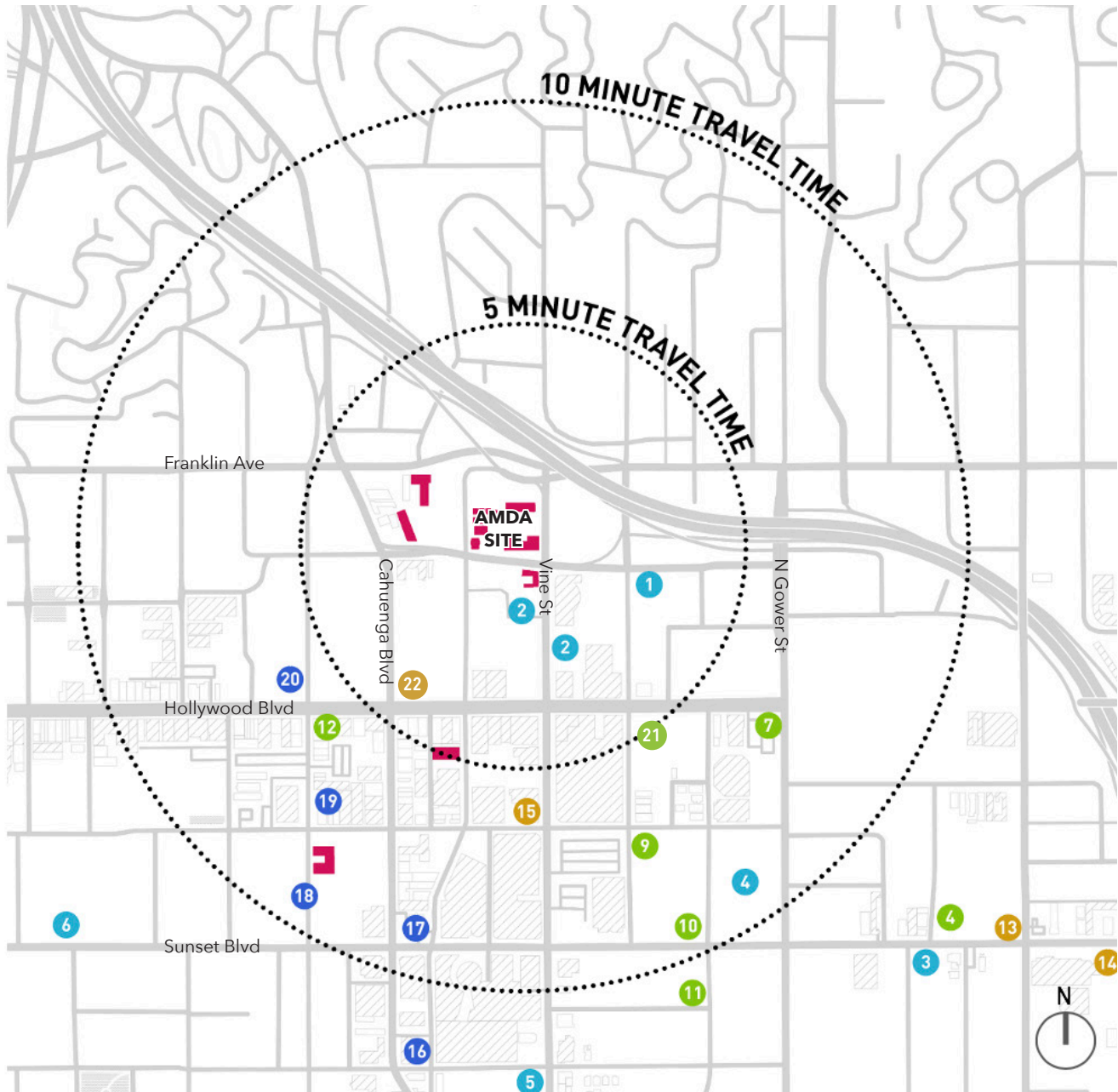
SCHOOLS

17. Los Angeles Film School
18. Hollywood Arts University High School

PARKS

19. Franklin-Ivar Park
20. Selma Park
21. Yucca Park

Hollywood Recent & Upcoming Developments

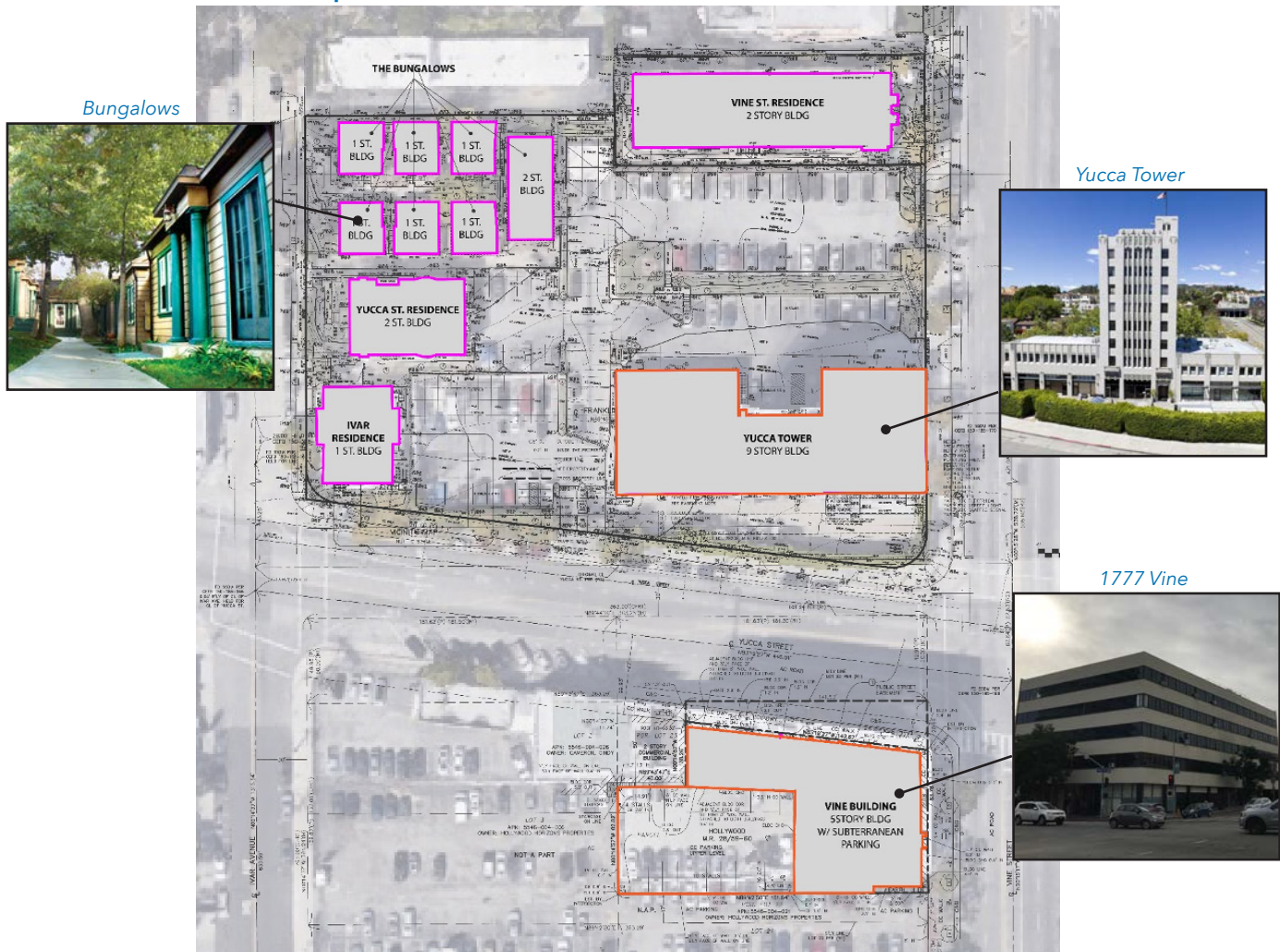


- | | |
|--|---|
| <ol style="list-style-type: none"> 1. 6220 Yucca: 32 stories, under construction 2. Hollywood Center (1720 Vine St.) – 2 towers at 35 and 46 stories & 2 11-story buildings, planned 3. Emerson College (5960 Sunset Blvd) – completed 4. Columbia Square – 20-story tower, completed 5. Academy on Vine (1341 Vine St.) – 20-story tower, under construction 6. Crossroads of the World (6671 Sunset Blvd.) – 26 to 32 stories, planned 7. Hollywood & Gower (6100 Hollywood Boulevard) – 22-story tower, planned 8. Sunset and Gordon (1528 Gordon St.) – 22-story tower, completed 9. <u>Modera Argyle</u> – 7 stories, planned 10. Palladium Residencies (6125 Sunset Blvd) – 28 stories, planned 11. 6200 Sunset Boulevard – 7 stories, under construction 12. Hollywood and Wilcox (6430 Hollywood Blvd.) – under construction | <ol style="list-style-type: none"> 13. EPIC at Sunset Bronson Studios – 13-story tower, completed 14. ICON and Cue at Sunset Bronson Studios (5901 Sunset Blvd) – under construction 15. 1601 Vine Street – 8-story tower, completed 16. Godfrey Hotel – completed 17. Ivar Gardens - planned 18. Thompson Hotel (1523 Wilcox) – under construction 19. Dream Hotel – completed 20. Whisky Hotel – under construction 21. Amoeba Music site (6200 Hollywood) - planned 22. Office tower (6381 Hollywood Blvd) - planned |
|--|---|

■ Mixed Use
 ■ Residential
 ■ Office
 ■ Hotel

[3] SITE DESCRIPTION

Yucca Campus & 1777 Vine Site



PARCEL INFO

The 2.2-acre **Yucca Campus** is bound by Yucca Street to the south, Vine Street to the east, Ivar Street to the west, and Franklin Ave to the north. Existing buildings include:

- **Yucca Tower:** an approximately 35,492 square foot tower primarily housing administrative uses, located at 6301 W. Yucca St.
- **Dormitory buildings:** the Ivar Residence, Yucca St. Residence, and Vine St. Residence, totaling 21,380 square feet.
- **Bungalows:** currently also used as student dormitories, totaling 6,060 square feet.

Additionally, the **Vine Site** at 1777 Vine St consists of an approximately 39,000 square foot office building converted to academic use for AMDA, primarily for classrooms and studios. Please see Attachment B for more detailed site and parcel maps.

ZONING

The northern portion of the Yucca Campus is located in an R4-2 district, while the southern portion and the Vine Site are located in a C4-2D-SN district. The entire Project Site's current zoning does not specifically restrict building height other than through the imposition of a maximum floor area ratio (FAR) limit. The C4-zoned portion of the Yucca Campus and the Vine Site both have "D" Development limitations that limit FAR as set forth in Table 1 below.

Per the recently adopted Transit Oriented Communities (TOC) Guidelines, which allows for averaging FAR across multiple parcels, including the Vine Site parcel across from Yucca Street, applying TOC FAR allows for a maximum floor area up to approximately 771,000 square feet, an increase of approximately 274,400 square feet from the by-right FAR. Note that this square footage is based on lot sizes reported in City records and not the buildable area of the lots, which is obtained after Code-required yard reductions are applied. AMDA will provide yard determinations during the RFP phase. Please note that the TOC entitlement vehicle is illustrative only, and AMDA is open to considering other entitlement options.

The Hollywood Redevelopment Plan splits the Yucca Campus between the High Residential and Regional Center Commercial land use designation. Housing unit density limitations under the Redevelopment Plan’s High Residential land use designation would apply to the High Residential properties. The Vine Site

is located entirely within the Redevelopment Plan’s Regional Center Commercial land use designation, where the Redevelopment Plan does not limit density. See Appendix C for further zoning details.

Site Zoning

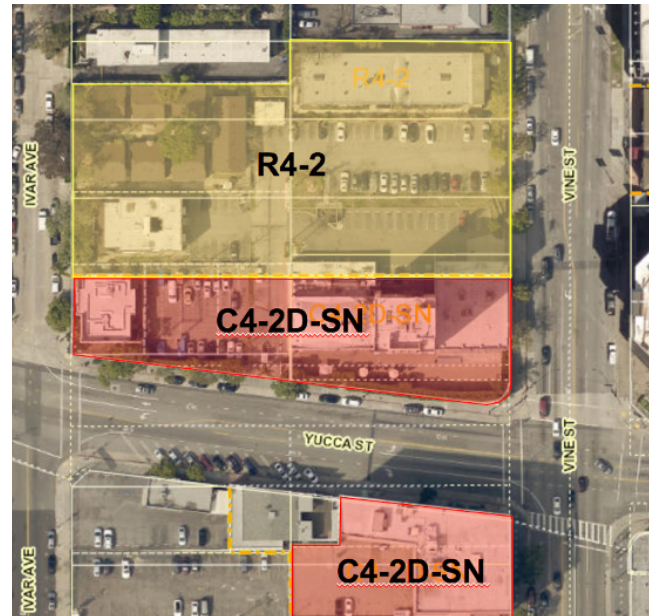


Table 1: Zoning Floor Area - Transit Oriented Communities Entitlement

Zone	Total Lot Area	By-Right FAR	TOC FAR	TOC Floor Area
R4-2	64,470 sf	6:1	9:1	580,250 sf
C4-2D-SN <i>(not inclusive of Vine Site)</i>	31,527 sf	2:1	3.75:1	118,226 sf
C4-2D-SN <i>(Vine Site only)</i>	15,660 sf	3:1	4.65:1	72,819 sf
Total allowable floor area:				771,295 sf

Table 2: Zoning Density - Transit Oriented Communities (as limited by Hollywood Redevelopment Plan)

Zone	Total Lot Area	By-Right Density	TOC Density
R4-21	64,470 sf	400	70% increase from base
C4-2D-SN <i>(not inclusive of Vine Site)</i>	31,527 sf	200*	70% increase from base
C4-2D-SN <i>(Vine Site only)</i>	15,660 sf	200*	80% increase from base

* = Per LAMC § 12.22 A.18(a), developments that combine residential and commercial uses on lots designated “Regional Center” or “Regional Commercial” are allowed to follow the R5 Zone, which permits one unit for every 200 square feet of lot area.

AMDA DESIRED PROGRAM

AMDA expects to expand facilities on the campus to meet both current space needs and planned growth goals, and we have conducted a careful space planning analysis of projected future facility needs. For the full envisioned project, we anticipate requiring a total of approximately 256,600 gross square feet, per the following uses:

Table 3: AMDA Facilities - Envisioned Full Program

Use Type	ASF	GSF
Classrooms	56,200	89,900
Other Academic Spaces	26,390	42,200
Performance Space	47,380	75,800
Other Student Space	10,150	16,200
Faculty, Staff, & Admin	20,330	32,500
Total	160,450	256,600

If required, we are amenable to a phased development approach to our program, occurring across two or more phases. AMDA would likely finance AMDA facilities through a combination of proceeds from the development rights for private development, as well as debt.

Based on an understanding of the site’s FAR and total developable area of approximately 771,000 square feet if the TOC entitlement vehicle is utilized, AMDA estimates approximately 517,500 square feet of remaining floor area would be available for other, non-AMDA development. As stated above, this square footage is based on lot sizes from City records. Once buildable area calculations are performed based on the site’s yards, we expect a slight reduction to these numbers.

MASSING SCENARIOS

Working with the zoning analysis and a third-party architect, AMDA has tested several massing and programming options similar to Table 4 below. This scenario assumes that:

- The Yucca Tower and Bungalows remain on-site. The Yucca Tower would likely

be retained and used by AMDA for administrative uses. Although the Yucca Tower must remain on-site under all scenarios, AMDA is open to considering other options for the Bungalows.

- FAR can be averaged across the entire site and the resulting floor area allocated across buildings as needed, as confirmed by LA City Planning.
- Greater residential density is allowed in Buildings B and C compared to Building A, due to the Hollywood Redevelopment Plan High Residential district designations (see Appendix C for zoning details.)
- Separate dedicated entrances would be required for AMDA in any building it shares with non-AMDA uses.

AMDA is open to considering alternative development scenarios, so long as its building and program goals are met.

Sample Massing Scenario

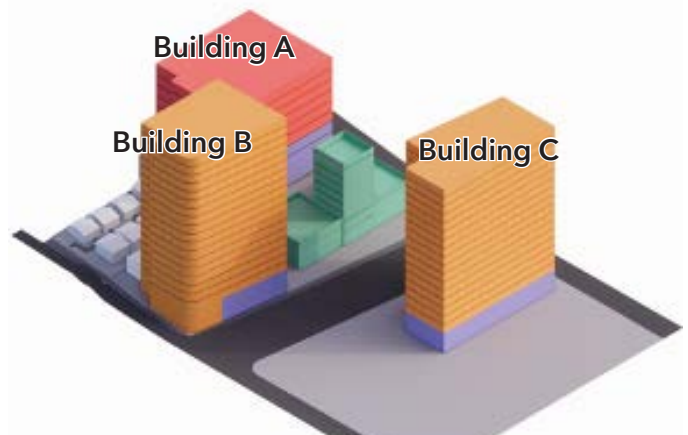


Table 4: Sample Massing Scenario

	Total (GSF)	AMDA (GSF)	Non-AMDA (GSF)
Building A	119,200	119,200	--
Building B	351,700	93,000	258,700
Building C	258,700	--	258,700
Yucca Tower	35,500	35,500	--
Bungalows	6,000	6,000	--
Total	771,100	253,700	517,400

PHASING

As described above, if required, AMDA is amenable to a phased development approach for AMDA facilities, occurring across two or more phases. For a first phase, AMDA anticipates requiring a range of approximately 80,000 - 90,000 gross square feet, consisting primarily of classrooms, studios, and theaters. Under this scenario, AMDA's Phase 1 space would primarily be constructed within Building B, at the base of a private residential tower. The remainder of AMDA's space would then be constructed in Building A during a subsequent phase.

Table 5: Proposed Phase 1 Program Scenario

	Total (GSF)	AMDA (GSF)	Non-AMDA (GSF)
Building A	<i>Subsequent phase</i>		
Building B	351,700	93,000	258,700
Building C	258,700	0	258,700
Total	610,400	93,000	517,400

AMDA will also consider alternative scenarios proposed that fulfill requirements for AMDA's space in Phase 1. Finally, we prefer to select a developer who will commit to the full scope of the envisioned project across multiple phases, and not solely to execute Phase 1.

PARKING

Parking is desired on-site; however, as development on the site is expected to be dense, above-ground parking may not be possible. AMDA encourages further discussion on creative parking solutions - such as underground parking, shared parking spaces, valet parking, or other off-site options - to serve both AMDA's needs and those of the future development. AMDA may require up to 500 spaces at full growth and currently manages or leases 300 spaces today.

BUSINESS TERMS

AMDA is open to developer recommendations on the development transaction structure (e.g. for sale, ground lease, joint venture, etc.)

For AMDA's facilities, AMDA also anticipates entering into a development agreement with the selected developer to construct AMDA space to AMDA's specifications. AMDA will be responsible for operations and management of AMDA space, with appropriate joint building management agreements as needed.



[4] SUBMISSION REQUIREMENTS

Respondents are requested to provide a submission that addresses the following topics and questions. All responses will be treated confidentially by AMDA. Please limit the total response to no more than 30 pages.

1. Developer Contact Information

Please identify the single point of contact (preferably executive level) for your organization with whom to communicate during the solicitation process, along with contact information.

2. Developer Qualifications and History

Please provide an overview of your firm's expertise and services, key staff, and an overall description of your portfolio. Provide evidence that your firm is capable of delivering all services necessary to plan, develop, design, construct, finance, lease, and operate a high-quality development project.

3. Proposed Team

Please specify the development team, including the operator(s), that you would propose to undertake the project, should your firm be selected. Please identify who will lead your team and how the project would be staffed, providing brief bios and qualifications for key people. If possible, please identify all potential

team members and their roles, including design, construction, operations, legal, finance, etc.

While not required at this stage, if you have partners in mind such as architects, engineers, builders, etc., please explain your rationale for selecting these firms or teams and provide samples of their work.

4. Project Experience and References

Please provide examples of up to five comparable projects, including current or past projects involving partnerships with academic or other nonprofit institutions, if applicable. Provide details including:

- Other project partners, including developers, architects, contractors, and financiers
- Description of uses
- Scale - gross square footage by type of use and number of residential units, if applicable
- Cost - total project cost and construction cost
- Ownership structure (e.g. owned by developer, an institution, or affiliate; also provide ground lease structure if applicable.)
- Project schedule - durations for design, approvals, and construction, as well as total project duration and completion date

If you do not have experience partnering with academic or other nonprofit institutions, this is not disqualifying. Please select five projects you would like to share with AMDA and explain why they demonstrate you would be a good partner for AMDA.

5. Financial Capacity/Guarantees

Please provide a discussion of your firm's financial capacity and ability to guarantee completion. Specify your customary sources of debt and equity capital, and indicate your firm's approach to project exit. Please indicate the entity that would provide a completion guarantee to AMDA, should your firm be selected.

6. Market

Please discuss the opportunity you envision at this site, based on anticipated market conditions. How do you view the project's location? What types of uses and project types may be most suitable? What residential and/or commercial values do you believe the site can command?

7. Planning and Design

Please discuss your preliminary considerations of the physical requirements of the development, including site planning, design aesthetic, and design features.

Identify three designers or design teams that you would propose for the development.

Please note that conceptual design ideas are neither expected nor desired at this stage in the selection process. AMDA's subsequent RFP will ask short-listed respondents to provide preliminary design concepts, in addition to more detailed information regarding their proposed team, approach, timeline, and fee.

8. Development Approach

Please discuss the viability of AMDA's approach as outlined in this RFEI, such as proposed phasing concept, massing, and program distribution. What do you see as the main areas of risk to completing the project and meeting AMDA's goals? What other opportunities or structures may be available to support AMDA's vision?

9. Project Timeline

Please outline your anticipated schedule for design, construction, and opening of the project, assuming a final award of the project by December 2020. Please

identify any risks, including entitlement risks, or contingencies to achieving the desired opening date.

10. References

Provide three references, including name, title, organization, email and phone, who can speak to your firm's work and approach. Please include institutional or nonprofit partners, if available.

11. Additional Information

Please feel free to include any additional information that you believe would be helpful to AMDA in understanding your firm, team or approach.

RFEI KEY DATES

Issue date: Friday, June 26, 2020

Intent to respond: Friday, July 3, 2020

Please notify via email to slin@u3advisors.com your intent to respond to this RFEI. Please also include any requests to schedule a virtual or in-person site tour.

Virtual or in-person site tours available:

June 20 - July 3, and July 6-10

Deadline to submit questions:

Friday, July 17, 2020

Answers will be distributed by Friday, July 24

Due date: Friday, July 31, 2020

Proposals are due no later than **5pm Pacific** on Friday, July 31, 2020. AMDA's real estate advisor, U3 Advisors, will serve as project manager for this solicitation process. Send an electronic copy (PDF) of your response via e-mail to Stephany Lin (slin@u3advisors.com).

Respondents who wish to make inquiries requesting clarification of the RFEI may do so via email to Stephany Lin (slin@u3advisors.com). All questions must be received by Friday, July 17. U3 Advisors will respond individually to each question but will make all submitted questions and answers available to all participating parties no later than Friday, July 24.

DISCLAIMERS

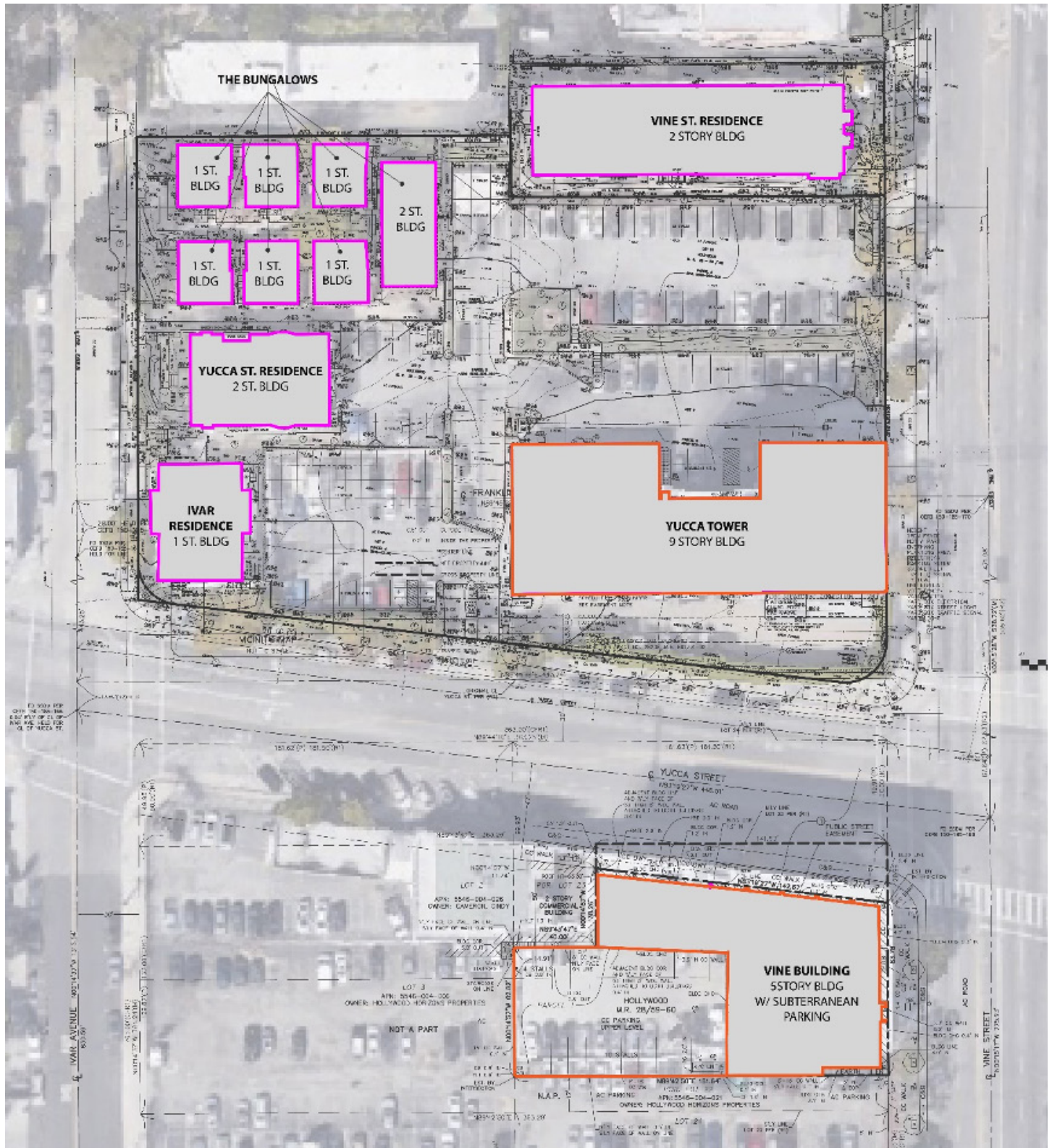
Nothing in this RFEI shall be construed as creating or offering the creation of a joint venture, partnership or other legal arrangement between AMDA and any respondent to this RFEI.

AMDA shall be the sole judge of the conformance of each respondent's submission to the requirements of this RFEI and of the merits of each submission. AMDA reserves the right to waive any conditions or modify any provision of this RFEI with respect to one or more respondents, to negotiate with one or more of the respondents with respect to all or any portion of this RFEI, to require supplemental statements and information from any respondents, to establish additional terms and conditions, to encourage respondents to work together, to negotiate with entities that do not respond to this RFEI, to conduct interviews with respondents, and to reject any or all responses in AMDA's judgment if it is in the best interest of AMDA to do so. AMDA will enforce the submission deadline stated in the RFEI at its discretion.

APPENDIX

APPENDIX A: SITE ANALYSIS

EXISTING SITE



APPENDIX A: ADDITIONAL SITE ANALYSIS

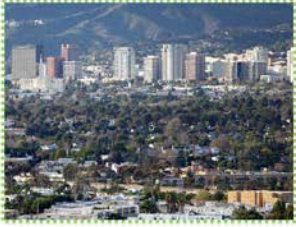
SITE ANALYSIS VIEWS



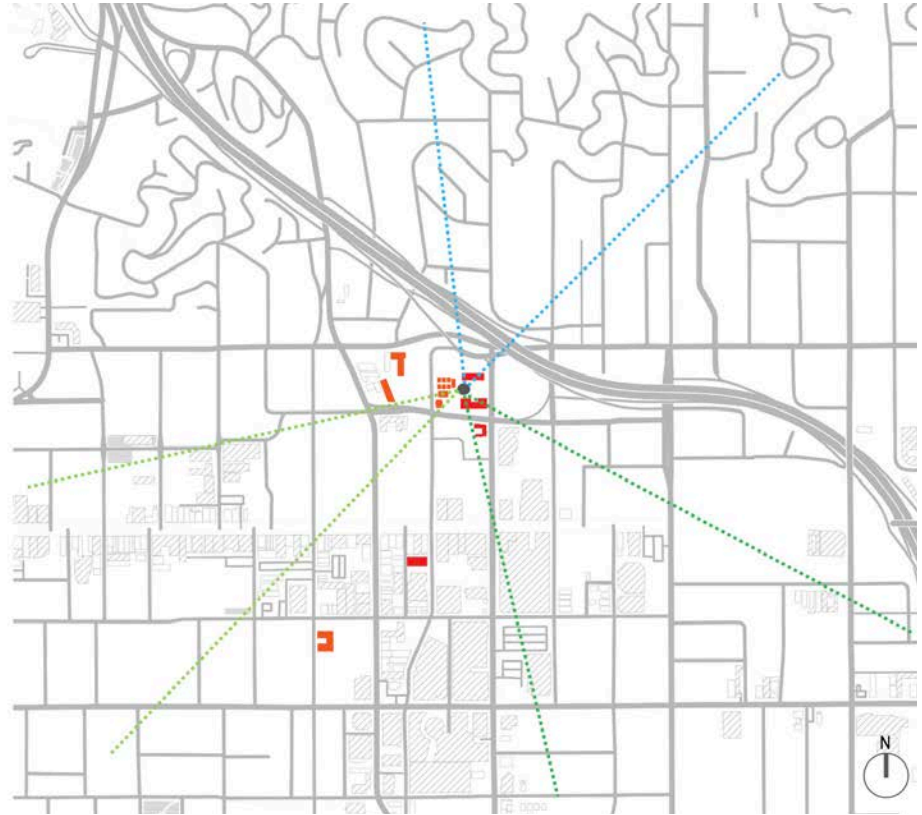
NORTHEAST
Hollywood Sign



SOUTHEAST
DTLA Skyline



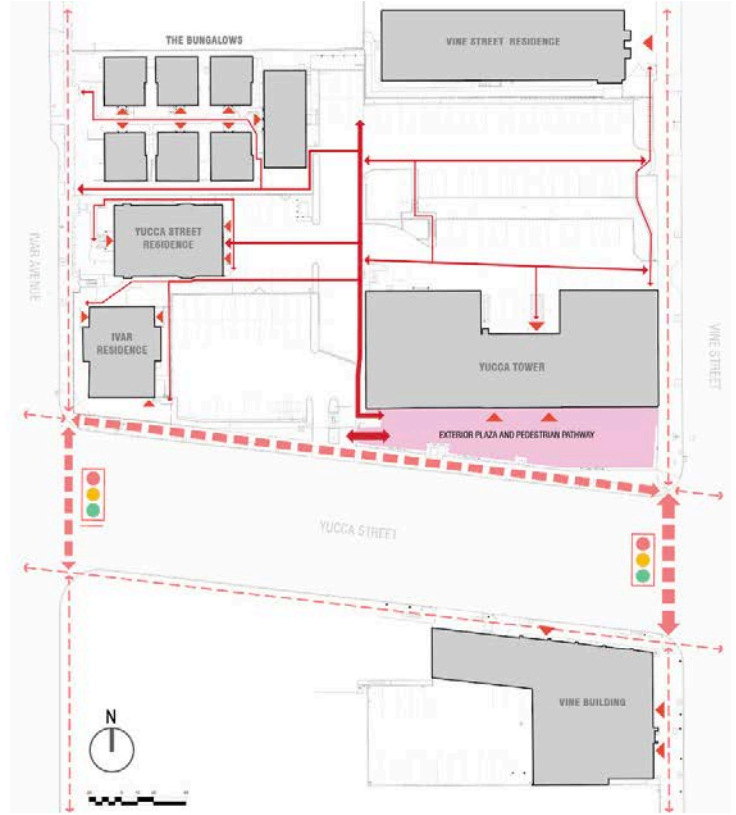
SOUTHWEST
West LA Skyline







APPENDIX A: ADDITIONAL SITE ANALYSIS

SITE ANALYSIS PEDESTRIAN CIRCULATION

-  TRAFFIC LIGHT
-  ENTRY POINTS
-  PEDESTRIAN PATH (PUBLIC)
-  PEDESTRIAN PATH (PRIVATE)



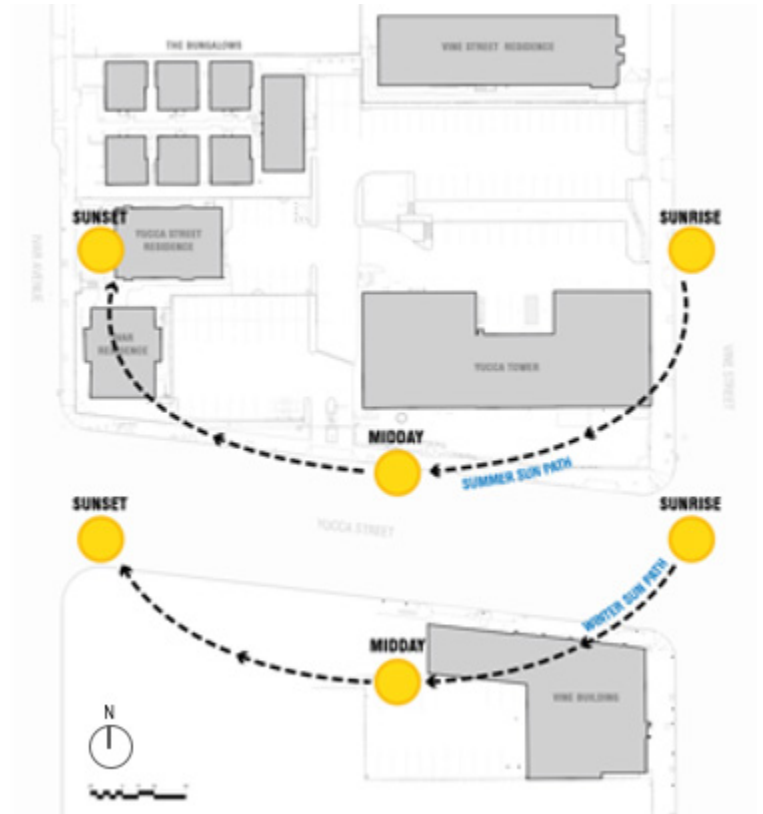
SITE ANALYSIS VEHICULAR CIRCULATION

-  TRAFFIC LIGHT
-  AUTO CIRCULATION
-  BUS ROUTE
-  BIKE PATH

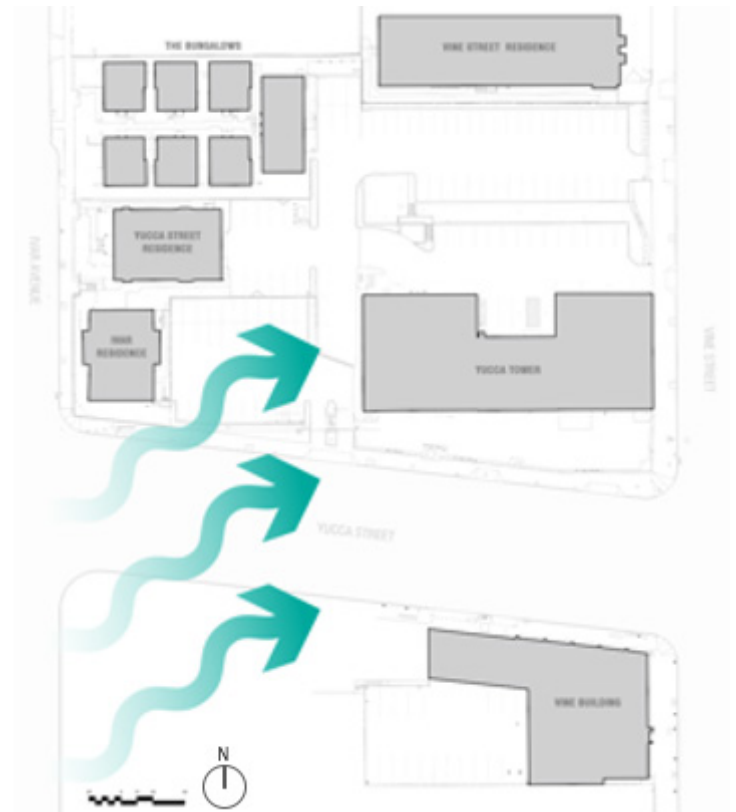


APPENDIX A: ADDITIONAL SITE ANALYSIS

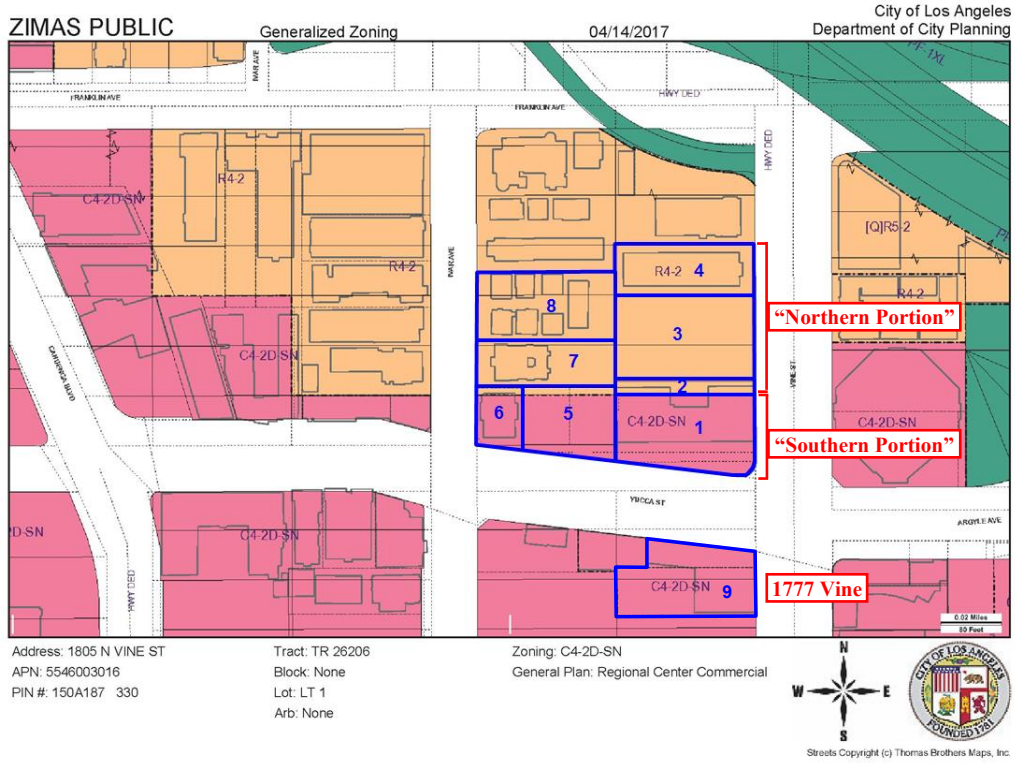
SITE ANALYSIS SOLAR PATH STUDY



SITE ANALYSIS PREVAILING WIND ORIENTATION



APPENDIX B: PARCEL MAPS

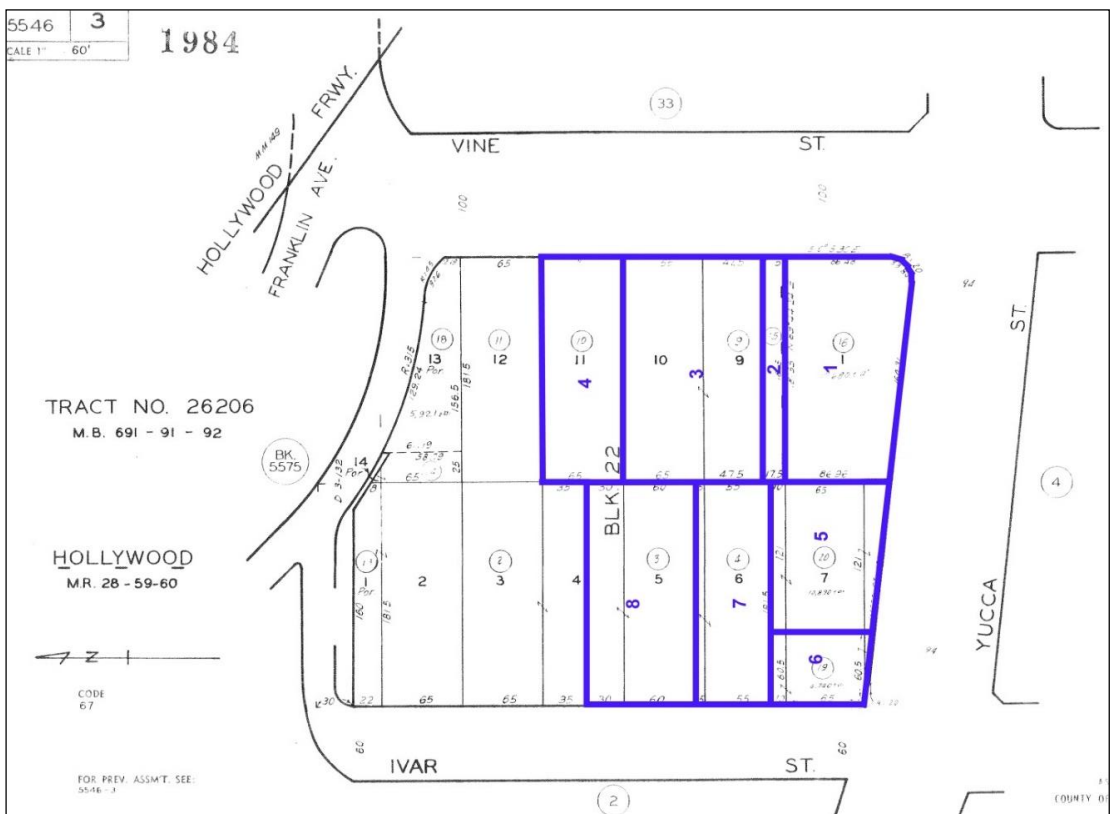


Legend

Parcel No.	Assessor Parcel No.	Site Name	Zone(s)
1	5546-003-016	“Southern Portion”	C4-2D-SN
2	5546-003-015	“Northern Portion”	R4-2
3	5546-003-009		
4	5546-003-010	“Southern Portion”	C4-2D-SN / R4-2 ¹
5	5546-003-020		
6	5546-003-019	“Northern Portion”	R4-2
7	5546-003-004		
8	5546-003-003	“1777 Vine”	C4-2D-SN
	5546-004-027		

APPENDIX B: PARCEL MAPS

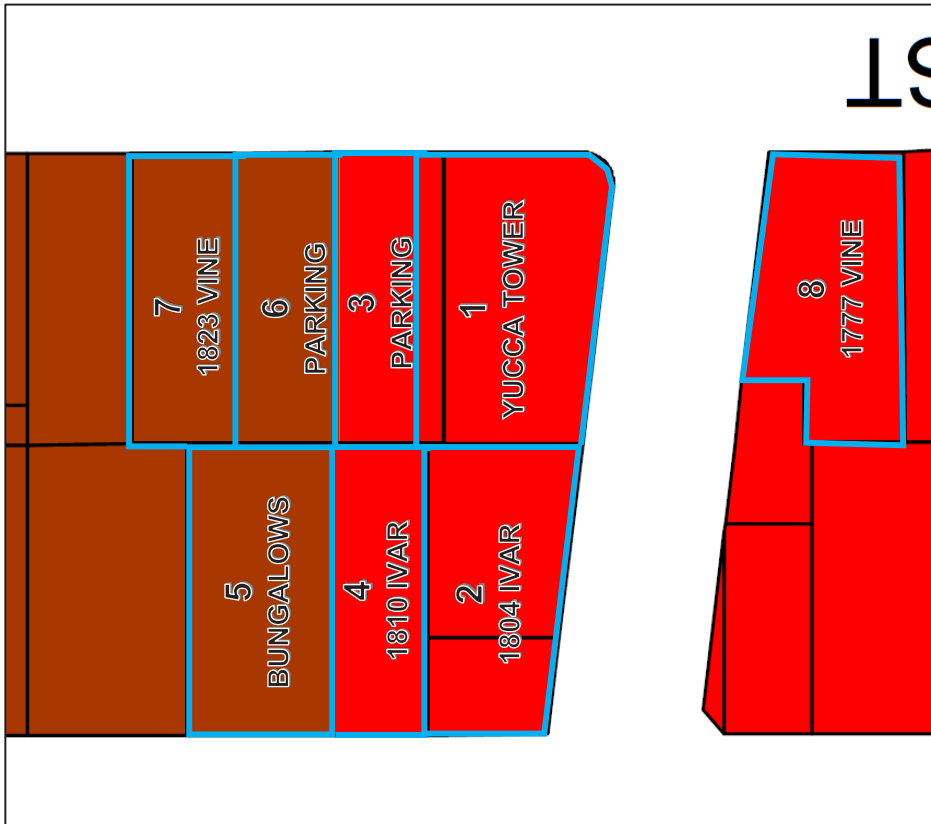
Assessor Parcel Maps



3

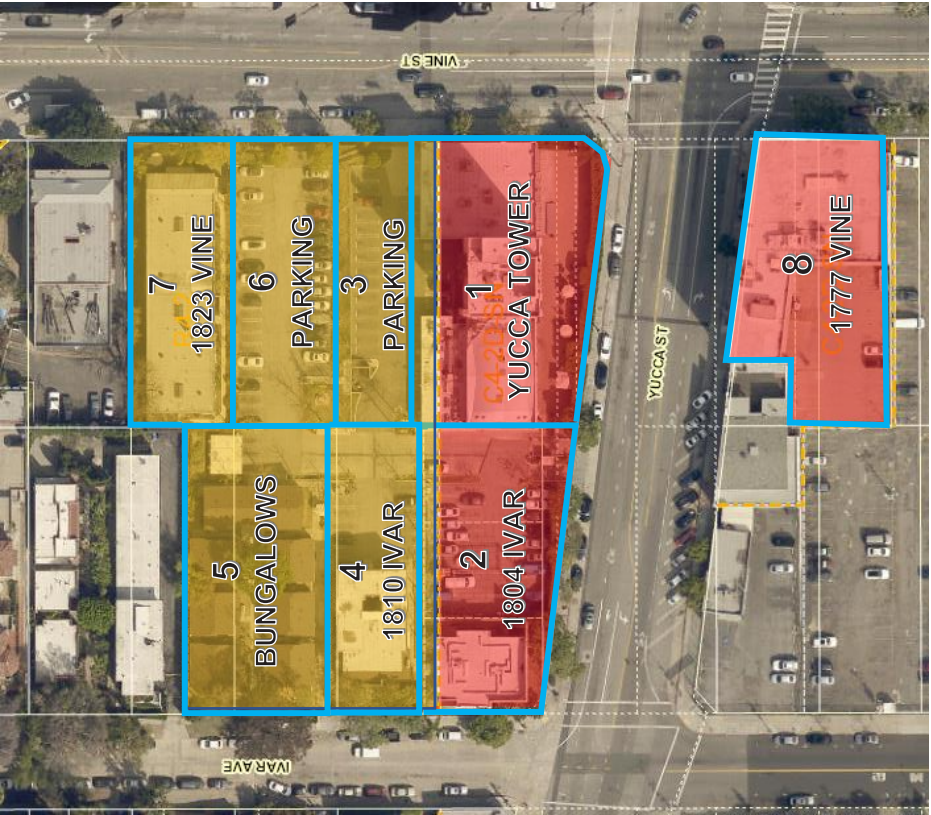
APPENDIX C: ZONING

Hollywood Redevelopment Plan



- Regional Center Commercial
- High Residential

Los Angeles Municipal Code

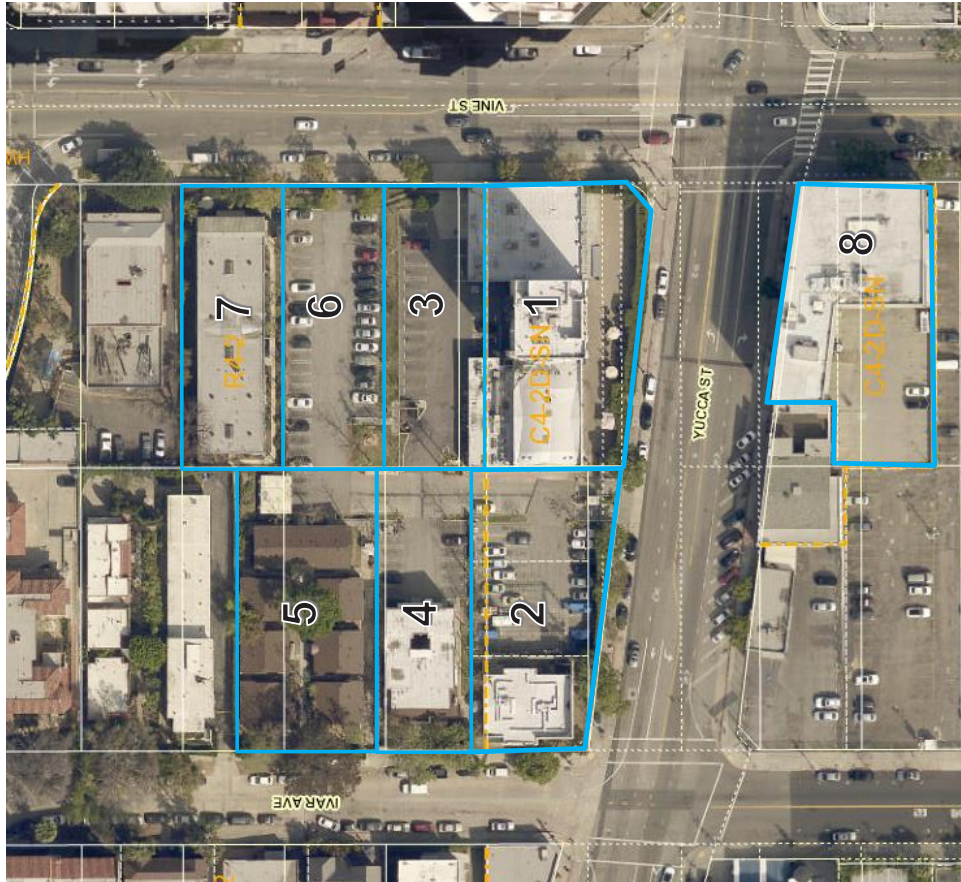


- C4-2D-SN Zone
- R4-2 Zone

APPENDIX C: ZONING

AS OF JUNE 2020

AMDA Los Angeles Campus: Preliminary Development Calculations¹



Yucca Campus

Redevelopment Plan Designation	Zoning	Property	Lot Area	By-right FAR	D-Lim. FAR
Regional Commercial Center	C4-2D-SN	1 Yucca Tower	17,724 s.f.	2:1	6:1
		2 Ivar Building #1	13,803 s.f.	2:1	6:1
	(1) Yucca Tower	3,180 s.f.	6:1	N/A	
	(2) Ivar Building #1	1,815 s.f.	6:1	N/A	
Subtotal	R4-2	3 Portion of Vine Parking Lot	8,631 s.f.	6:1	N/A
		4 Ivar Building #2	10,890 s.f.	6:1	N/A
Subtotal			56,043 s.f.	-	-
High Residential	R4-2	5 Bungalows	16,335 s.f.	6:1	N/A
		6 Remaining portion of Vine Parking Lot	11,810 s.f.	6:1	N/A
	Subtotal		7 Vine Apartments	11,809 s.f.	6:1
Yucca Campus Subtotal			39,954 s.f.	-	-

1777 Vine

Redevelopment Plan Designation	Zoning	Property	Lot Area	By-right FAR	D-Lim. FAR
Regional Commercial Center	C4-2D-SN	8 1777 Vine	15,660 s.f.	3:1	6:1
Yucca Campus + 1777 Vine Total			111,657 s.f.		

¹ All lot area and zoning floor area calculations based on publicly available information through the City of Los Angeles' Zoning Information and Map Access System ("ZIMAS") and by online records made available by the Department of City Planning, and by the Los Angeles Municipal Code ("LAMC"). Please note that all Campus area calculations must be confirmed by a surveyor or civil engineer, and all FAR and density calculations should be verified by City staff prior to submittal of any entitlement applications.

APPENDIX G: ZONING

AS OF JUNE 2020

Transit Oriented Communities Entitlement

	1 & (1) Yucca Tower	2) & (2) Ivar Building #1	3 & 6) Vine Parking Lot	4) Ivar Building #2	5) Bungalows	7) Vine Apartments	8) 1777 Vine
Redevelopment Plan Designation	Regional Center Commercial	Regional Center Commercial	Regional Center Commercial	Regional Center Commercial	High Residential	High Residential	Regional Center Commercial
Zoning	C4-2D-SN R4-2	C4-2D-SN R4-2	R4-2	R4-2	R4-2	R4-2	C4-2D-SN
Lot Area	17,724 s.f. 3,180 s.f.	13,803 s.f. 1,815 s.f.	8,631 s.f. 11,810 s.f.	10,890 s.f.	16,335 s.f.	11,809 s.f.	15,660 s.f.
By-Right FAR	2:1	2:1	6:1	6:1	6:1	6:1	3:1
By-Right Floor Area	35,448 s.f.	27,606 s.f.	51,786 s.f.	65,340 s.f.	98,010 s.f.	70,854 s.f.	46,980 s.f.
TOC Tier	3	3	3	3	3	3	4
TOC FAR	3.75:1	3.75:1	9:1	9:1	9:1	9:1	4.65:1
TOC Floor Area	66,465 s.f.	51,761 s.f.	77,679 s.f.	98,010 s.f.	147,015 s.f.	106,281 s.f.	72,819 s.f.

Max. Allowable Floor Area: TOC and Hollywood Redevelopment Plan

1 & (1) Yucca Tower	66,465 s.f.
	28,620 s.f.
2 & (2) Ivar Building #1	51,761 s.f.
	16,355 s.f.
3 & 6) Vine Parking Lot	77,679 s.f.
	106,290 s.f.
4) Ivar Building #2	98,010 s.f.
5) Bungalows	147,015 s.f.
7) Vine Apartments	106,281 s.f.
Subtotal	698,476 s.f.
8) 1777 Vine	72,819 s.f.
Total	771,295 s.f.

APPENDIX C: ZONING

AS OF JUNE 2020

Yucca Campus Density: By-Right per Zoning

Zoning	Property	Lot Area	Lot Area/Unit	By-Right Dwelling Units
C4-2D-SN	1 Yucca Tower	17,724 s.f.	200*	158
	2 Ivar Building #1	13,803 s.f.		
R4-2	(1) (Portion of Yucca Tower)	3,180 s.f.	400	163
	(2) (Portion of Ivar Building #1)	1,815 s.f.		
	3 Vine Parking Lot	8,631 s.f.		
	4 Ivar Building #2	10,890 s.f.		
	5 Bungalows	16,335 s.f.		
	6 Vine Parking Lot	11,810 s.f.		
	7 Vine Apartments	11,809 s.f.		
Subtotal		95,997 s.f.	-	321 units

1777 Vine Density: By-Right per Zoning

Zoning	Property	Lot Area	Lot Area/Unit	By-Right Dwelling Units
C4-2D-SN	1777 Vine	15,660 s.f.	200*	79 units

Total Density: By-Right

Total Lot Area	By-Right Dwelling Units
111,657 s.f.	400

* = Per LAMC § 12.22 A. 18(a), developments that combine residential and commercial uses on lots designated "Regional Center" or "Regional Commercial" are allowed to follow the R5 Zone, which permits one unit for every 200 square feet of lot area.

APPENDIX C: ZONING

AS OF JUNE 2020

Yucca Campus Density: TOC (as limited by Hollywood Redevelopment Plan)

	1 and (1) Yucca Tower		2) Ivar Building #1		3 & 6) Vine Parking Lot		4) Ivar Building #2		5) Bungalows		7) Vine Apartments		8) 1777 Vine	
Redevelopment Plan Designation	Regional Center Commercial		Regional Center Commercial		High Residential		Regional Center Commercial		High Residential		High Residential		Regional Center Commercial	
Zoning	R4-2		R4-2		R4-2		R4-2		R4-2		R4-2		C4-2D-SN	
Base Density	89 units		69 units		60 units		32 units		41 units		30 units		79 units	
TOC Tier	3		3		3		3		3		3		4	
TOC Incentive	70% increase		70% increase		70% increase		70% increase		70% increase		70% increase		80% increase	
TOC Density	152 units		118 units		102 units		55 units		70 units		51 units		143 units	
Redevelopment Plan Limit	No limit		No limit		80 units per gross acre		No limits		80 units per gross acre		80 units per gross acre		No limit	
Lot Area in Gross Acres	-		-		0.29		-		0.43		0.36		-	
Redevelopment Plan Density	-		-		24 units		-		35 units		29 units		-	
SB1818 Density Bonus	121 units		94 units		32 units		44 units		56 units		41 units		107 units	

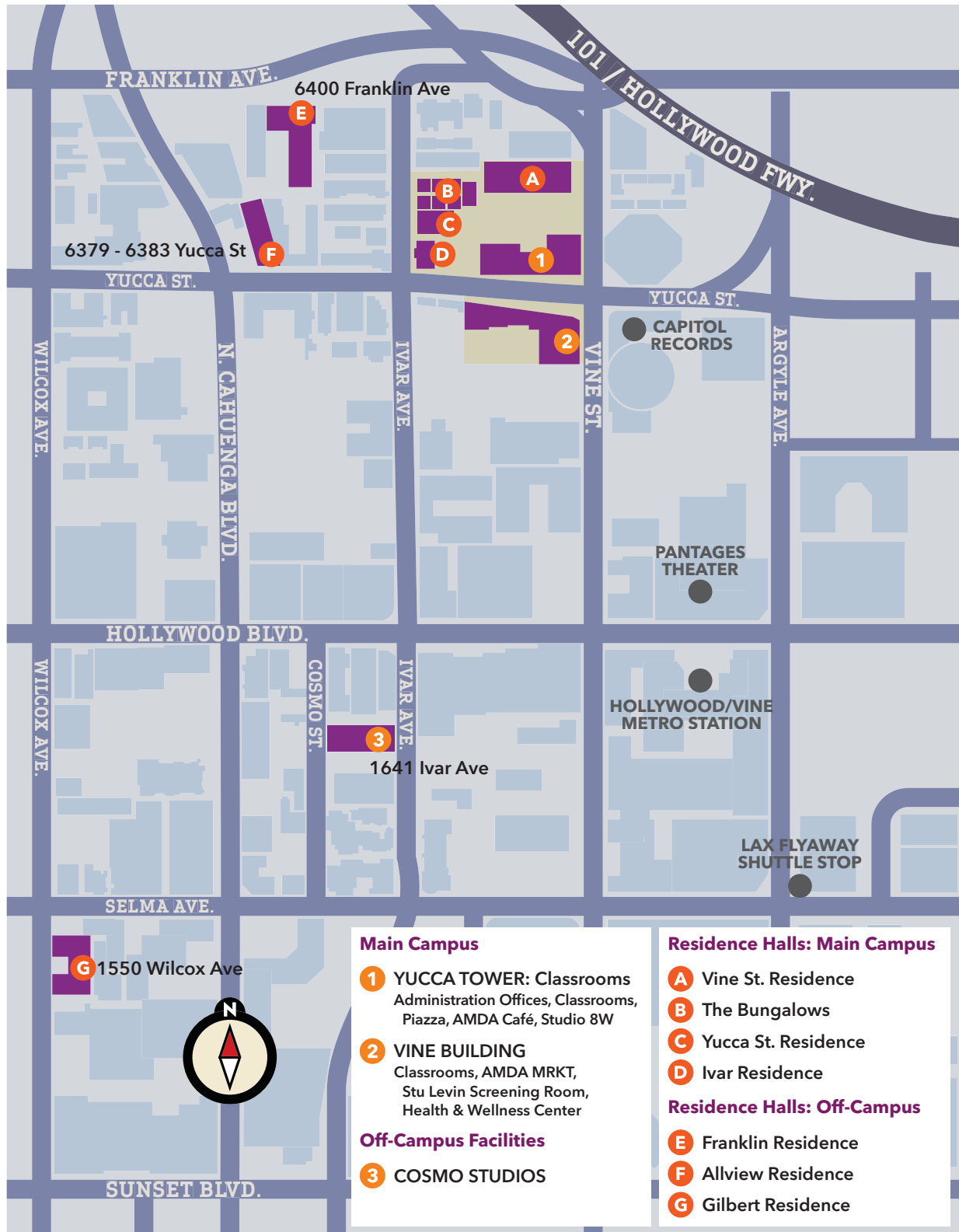
Max. Allowable Density:

TOC & Hollywood Redevelopment Plan		SB1818	
1 & (1) Yucca Tower	152	1 & 1) Yucca Tower	121
	14		11
2 & (2) Ivar Building #1	118	2 & (2) Ivar Building #1	94
	9		7
3 & 6) Vine Parking Lot	51	3 & 6) Vine Parking Lot	41
	24		32
4) Ivar Building #2	55	4) Ivar Building #2	44
5) Bungalows	35	5) Bungalows	56
7) Vine Apartments	29	7) Vine Apartments	41
Subtotal	487 units	Subtotal	447 units
8) 1777 Vine	143	8) 1777 Vine	107
Total	630 units	Total	554 units

APPENDIX D: AMDA LOS ANGELES FACILITIES MAP

AMDA Los Angeles Map

AMDA facilities, residence halls, and neighborhood. (Map scale is approximate.)





Mayer Brown LLP
350 South Grand Avenue
25th Floor
Los Angeles, CA 90071-1503
United States of America



T: +1 213 229 9500
F: +1 213 625 0248

mayerbrown.com

Edgar Khalatian
Partner

T: +1 213 229 9548
F: +1 213 576 8130

EKhalatian@mayerbrown.com

October 5, 2020

BY EMAIL

City Planning Commission
City of Los Angeles
200 North Spring Street, Room 272
Los Angeles, CA 90012

Re: Hollywood Center Project - VTT-82152; CPC-2018-2114-DB-CU-MCUP-SPR; CPC-2018-2115-DA; and ENV-2018-2116-EIR

Dear Members of the City Planning Commission (CPC):

On behalf of the applicant for the aforementioned project, attached is a letter that we submitted to the California Geological Survey (the “CGS”) addressing CGS’s misleading statements regarding the suggestion of an active fault at the property.

A few project objectors have recently asked questions about the veracity of the multiple scientific studies that have all concluded that NO active fault exists under the subject property. As we will make extremely clear to you during the October 15, 2020 City Planning Commission hearing, any suggestion that an active fault has been found here is patently false. Our presentation will be based on a number of City approved geologic reports, prepared in accordance with CGS’ own guidelines, and peer-reviewed by internationally-recognized experts.

Based on this proven scientific evidence, we submitted the attached letter to CGS and simultaneously requested that the California Board of Professional Engineers, Land Surveyors, and Geologists conduct a formal investigation into CGS’ motives for submitting a letter that is not based in fact or science and is inconsistent with CGS’ own published protocols.

As explained in the City’s Final EIR, CGS inexplicably continues to pursue what appears to be a multi-year effort to reach a preordained conclusion, all at the risk of basic scientific principles. We further find it disingenuous that CGS has not submitted comments to the City regarding other proposed development projects located near the project site, which would be similarly impacted by the data in the CGS letter, if the data were to be accurate. Furthermore, it is blatantly apparent that CGS’s false characterizations of conditions at the property is based on data that is of extremely poor quality with no basis in science or as the result of analyzing data from on-site investigations.

Mayer Brown LLP

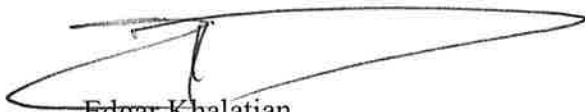
City Planning Commission

October 5, 2020

Page 2

We respectfully request that you base your decision on reliable and proven scientific data that there is no active fault at the property.

Sincerely,

A handwritten signature in black ink, appearing to read 'Edgar Khalatian', written over a horizontal line.

Edgar Khalatian
Partner

Att.

Mayer Brown LLP
350 South Grand Avenue
25th Floor
Los Angeles, CA 90071-1503
United States of America

T: +1 213 229 9500
F: +1 213 625 0248

mayerbrown.com

August 25, 2020

BY EMAIL

Edgar Khalatian

Partner
228053

T: 213.229.9548
ekhalatian@mayerbrown.com

Mr. Steve Bohlen
State of California Natural Resources Agency
Department of Conservation
Office of the State Geologist
801 K Street, MS 12-30
Sacramento, CA 95814

Re: CGS Comment Letter dated July 16, 2020
regarding the Hollywood Center Project

Dear Mr. Bohlen:

This firm represents the owners of the property located at 1720 North Vine Street¹ (the “Property”) in the City of Los Angeles (the “City”). We write today to address the false and misleading statements made by the California Geological Survey (“CGS”) regarding the planned mixed-use project at the Property (the “Hollywood Center Project” or the “Project”).

Specifically, in a letter to the City dated July 16, 2020 (“the CGS Letter”), CGS claims that a recent USGS Study² presents “new” evidence that demonstrates the presence of an active fault strand on the Property. This highly inflammatory claim misconstrues the USGS Study, ignores basic scientific standards, and sadly represents yet another example of a concerted, years-long effort from somewhere within CGS to push a preordained conclusion at the risk of the agency’s reputation and basic scientific principles.

This letter evidences how the CGS Letter intentionally omitted critical data to influence unfounded conclusions of fault activity and propagated biased interpretations based on impaired and selective interpretations out of context without regard for facts.

The underlying bias is clear from the letter’s unwarranted dismissal of exhaustive subsurface studies that consistently found evidence precluding the possibility of an active fault on the Property.³ These studies – conducted in full compliance with CGS standards by renowned

¹ The Property consists of the following assessor parcel numbers: 5546-004-006, 5546-004-029, 5546-004-020, 5546-004-021, 5546-004-032, 5546-030-028, 5546-030-031, 5546-030-032, 5546-030-033, and 5546-030-034.

² The United States Geological Survey (“USGS”) issued a report on May 8, 2020 entitled “2018 U.S. Geological Survey – California Geological Survey Fault-Imaging Surveys Across the Hollywood and Santa Monica Faults, Los Angeles County, California” (the “USGS Study”).

³ An active fault is one that has had surface displacement within Holocene time (since the last Ice Age, i.e., within the last 11,700 years).

Hollywood Center re CGS Letter.pdf

Mayer Brown LLP

Mr. Steve Bohlen

August 25, 2020

Page 2

geologists – utilized the most scientifically-credible methods of fault investigation, including extensive trenching, transect CPTs and core borings. Importantly, all of the studies were also subjected to peer review, including review by paleoseismic experts and the City. Furthermore, at least one of the authors of the CGS Letter was also present during all of the fault trench viewings and participated in review of the transect data, which proves that CGS is fully familiar with the fault studies and yet omitted the relevant scientific data from its letter to the City.

The CGS Letter ignores these findings and seeks to obfuscate the science by claiming a recent USGS Study provides “new” evidence that demonstrates an active fault on the Property. A simple read of the USGS Study shows that is not the case.

The USGS Study does not conflict with the prior findings nor does it provide new data that illustrates fault activity contrary to the approved site-specific fault studies. All of the studies infer fault traces, but only the site-specific trenching and transect studies sought to determine the rupture history, which is determinative on whether the fault is considered active under Alquist-Priolo Zone regulations. The site-specific studies found evidence precluding the possibility of an active fault for at least the last 30,000 years. By contrast, the USGS Study never even sought to date the last rupture. In fact, the first page of the USGS Study makes clear that its seismic data provides “*little or no information*” about the rupture history of the fault traces.”

In other words, the USGS Study admits on its face that it contains no scientific evidence by which CGS or any other geologist could ascertain whether the fault is active, undercutting the entire foundation of CGS’ argument. The CGS Letter, not surprisingly, fails to point this out. It also fails to point out that USGS urged “*extreme caution*” in evaluating its data because of the noisy conditions caused by high-cultural noise levels on North Argyle Avenue, heavy traffic along the 101 overpass and Hollywood Boulevard, and subway trains.

No doubt recognizing the fallacy of relying on the USGS Study, the CGS Letter also clings to two other investigations cited in that study (Ninyo & Moore, 2015; and Group Delta, 2015). That is again misleading, as one of the investigations was never signed and the other fault was considered indeterminate and needed further investigation. Moreover, both investigations involved sites that are blocks away from the Property and are of little probative value relative to the Property.

CGS’ claim that “new” evidence casts doubt on the findings from the 2015 and 2019 Fault Studies is factually inaccurate. The USGS Study identified four potential locations of fault “activity” along North Argyle Avenue. However, the on-site trenching determined that there are no active faults at three of the four locations identified in the CGS Letter. The CGS Letter fails to acknowledge this salient point. Furthermore, CGS, without explanation, intentionally located this supposed fault approximately 30 feet south of where USGS interpreted possible faulting.

Lastly, and equally disturbing, is the CGS Letter’s recount of the site-specific fault study peer review (ECI, 2015). Not only does the CGS Letter misquote simple geologic legend definitions provided in the peer review figures, but it misguides readers as to the interpretations presented in

Hollywood Center re CGS Letter.pdf

Mayer Brown LLP

Mr. Steve Bohlen

August 25, 2020

Page 3

the peer review. If the peer review is read in the context for which it was prepared, as all scientific based documents are, it is obvious that the conclusions of the data evaluation lead the reviewer to support the findings in the site-specific fault studies for the Property that the faulting below the Property has been inactive through at least the Holocene time (i.e., since the Ice Age). In short, like the USGS Study, the two other investigations referenced by CGS provide no credible basis to question the peer-reviewed conclusions reached in the prior site-specific fault studies.

We will not speculate on CGS' motives for submitting such a misleading letter at this late stage, other than to say that over the last several years, it appears that factions at CGS have pursued an arbitrary and capricious campaign to reach a preordained conclusion on this Project, regardless of what the scientific evidence demonstrated. Whether that effort was motivated by hubris or an improper effort to aid Project opponents is not yet clear. What is clear, though, is that CGS' actions on the Hollywood Center Project stand in stark contrast to its silence on the many other entitlement projects pending in the Property's immediate surroundings.

Below are additional details regarding our concerns. We respectfully request that you immediately investigate the facts surrounding the issuance of the CGS Letter and either rescind the letter or provide immediate contextual clarification that the studies presented in the CGS Letter do not provide a scientific basis to infer an active fault on the Property.

I. The 2015 and 2019 Fault Studies Both Found No Active Fault on the Property.

Two geological studies were performed on the Property by Group Delta Consultants, Inc. ("Group Delta"), a leading geotechnical engineering firm that has been practicing with professional geologists on earthquake hazards for more than thirty years; one was dated March 6, 2015 (the "2015 Fault Study") and another was dated July 19, 2019 (the "2019 Fault Study"). Both studies were peer reviewed by another leading geological consulting firm, Earth Consultants International. The studies collectively involved:

- A review of previous site exploration data;
- A review of site vicinity fault investigation data;
- 48 core borings;
- 117 cone penetration tests; and
- Excavation and logging of four trenches, the locations of which were reviewed by CGS and approved by the City, to evaluate the stratigraphic horizons and potential fault traces.

Germane to the issue here, Group Delta geologists, the City geologist, and CGS geologists personally entered the trenches to observe whether there was any Holocene-age fault movement. Following this inspection, all of the geologists unanimously concluded that there was clear evidence precluding the possibility of an active fault.

Mayer Brown LLP

Mr. Steve Bohlen

August 25, 2020

Page 4

In addition to the trenching, the following on-site geotechnical investigations were performed:

PRIOR ON-SITE GEOTECHNICAL INVESTIGATIONS PERFORMED

Consultant	Report Date and Type	Fault Related Investigation/Conclusions
Langan Engineering & Enviro. Services	5/10/2012 Geotechnical	<ul style="list-style-type: none">• Four geotechnical borings to depths ranging from 61.5 to 101.5 feet• Feasible Project with conditions that could be mitigated
Group Delta Consultants (See Appendix G)	3/6/2015 Fault Activity Investigation	<ul style="list-style-type: none">• 35 continuous core borings, 78 Cone Penetrometer Tests (CPTs), maximum explored depth of 60 feet, two fault study trenches on the East Site• No Holocene-active faults – Project approved for redevelopment
Earth Consultants International	3/9/2015 & 6/3/2015 Fault Study Review	<ul style="list-style-type: none">• Third-party opinion of 2015 Group Delta investigation• Agreed no Holocene-active faults – Project approved for redevelopment
Rockwell Consulting	12/13/2018 Fault Study Review	<ul style="list-style-type: none">• Paleoseismic and soil specialist interpretation of the Holocene seismic history at the Project Site• No Holocene-active faults – Project approved for redevelopment
Earth Consultants International	7/18/2019 Fault Study	<ul style="list-style-type: none">• Third-party review of 2019 Group Delta investigation• Agreed no Holocene-active faults – Project approved for redevelopment
Group Delta Consultants (See Appendix G)	7/19/2019 Surface Fault Rupture Hazard Evaluation Report	<ul style="list-style-type: none">• 8 continuous core borings to maximum depth of 55 feet, 18 cone penetrometer test borings to maximum depth of 60 feet, three trenches to maximum depth of 15 feet, soil horizon dating, concluded no fault activity within at least the last 120,000 years• No Holocene-active faults• Recommended removal of 50-foot building setback zone for Project Site
Feffer Geological Consulting (See Appendix G)	9/23/2019 Geotechnical Investigation	<ul style="list-style-type: none">• Researched previous investigations, 4 soil borings to maximum depth of 135.5 feet, installation of one groundwater monitoring well, geotechnical testing of soil samples, provided preliminary geotechnical recommendations for project design, concluded project feasible with mitigatable conditions

Mr. Steve Bohlen
 August 25, 2020
 Page 5

The following local geotechnical investigations were also performed in the Property’s vicinity:

LOCAL GEOTECHNICAL INVESTIGATIONS PERFORMED

Consultant	Location	Report Date and Type	Fault Related Investigations/Conclusions
Group Delta Consultants	1800 Argyle Avenue	6/30/2014 Geotechnical	<ul style="list-style-type: none"> • See 2015 Fault Study • Feasible project with mitigatable conditions
Group Delta Consultants	1756,1760 Argyle Avenue	9/7/2014 Fault Study	<ul style="list-style-type: none"> • 13 CPTs, 5 continuous core borings, fault trenches, bucket auger borings • No Holocene-active faults – project approved for redevelopment
Group Delta Consultants	6220 West Yucca Street	10/7/2015 Geotechnical	<ul style="list-style-type: none"> • See 2015 Fault Study • Feasible project with mitigatable conditions
Group Delta Consultants	1800 Argyle Avenue	11/10/2015 Fault Study	<ul style="list-style-type: none"> • 20 CPTs, 2 Bucket auger borings, 9 Continuous core borings, fault trenches • No Holocene-active faults – project approved for redevelopment
Group Delta Consultants	1718 Vine Street	7/28/2016 Fault Study	<ul style="list-style-type: none"> • 7 continuous core borings, 14 CPTs, maximum explored depth of 80 feet • No Holocene-active faults; feasible project with mitigatable conditions; project approved for redevelopment
Rockwell Consulting	6305 Yucca Street	7/9/2018 Fault Study	<ul style="list-style-type: none"> • Paleoseismic and soil specialist interpretation of the Holocene seismic history at the site • No Holocene-active faults – project approved for redevelopment
Group Delta Consultants	6305 Yucca Street	8/30/2018 Fault Study	<ul style="list-style-type: none"> • Core borings and fault trenches • No Holocene-active faults – project approved for redevelopment

The above charts demonstrate that the Property and the surrounding area have been subjected to extensive subsurface testing and multiple layers of review consistent with best practices and CGS standards. Evaluations were performed and reviewed by renowned geologists, including CGS. And they were approved by the City. They provide the best technical evaluation of the surface fault rupture hazards at the Property and the surrounding area, yet CGS inexplicably dismisses them outright.

II. CGS’ Efforts to Discredit the 2015 and 2019 Fault Studies Ring Hollow.

CGS seeks to discredit the 2015 and 2019 Fault Studies by erroneously suggesting they were not sufficient. That is nonsense.

This is not the first time that CGS has attempted to “move the goal posts” on this Project when the scientific data did not support its preordained conclusion. For example, after the 2014 fault trench exposure refuted the presence of Holocene faults that CGS had mapped, CGS simply moved the fault strands north into Yucca Street and south, just outside the southern limits of trenching. Similarly, CGS decided to extend the width of its zone, but again only after trenching was

Hollywood Center re CGS Letter.pdf

Mayer Brown LLP

Mr. Steve Bohlen

August 25, 2020

Page 6

completed and revealed no active fault. When the science does not support an active fault, that science should be respected, not undermined by repeatedly moving the fault traces to avoid inconvenient data.

As for the CGS call for additional trenching, this ignores the extensive subsurface testing already conducted on the Property. Trenching is not the only way to evaluate fault recency. As outlined in CGS SP 42 and LABC 1803.5.11 Document No. P/BC 2020-129, transects of closely spaced CPTs and core boring investigations are considered a reliable method when interpreted by a trained certified engineering geologist. In fact, they are often the only subsurface investigation method used to evaluate fault recency below an urban site. Here, several transects of closely spaced CPTs and core borings were extended to the southern perimeter of the Property. After evaluating the transects, combined with the stratigraphy evaluated in the extensive trenching, experienced geologists unanimously concluded that there has been no fault activity for at least 30,000 years. And again, these interpretations were already subjected to peer review and approved by the City.

III. CGS Did Not Present “New” Evidence Pointing to an Active Fault on the Property.

CGS’ claim that “new” evidence casts doubt on the findings from the 2015 and 2019 Fault Studies is likewise nonsense. The USGS Study identified four potential locations of fault “activity” along North Argyle Avenue. However, the trenching already found evidence to refute active faults at three of the four locations identified in the CGS Letter, which are in fact identified as two fault zones in the USGS report (not four individual fault traces as CGS claimed). The CGS Letter fails to acknowledge this salient point, and instead focuses attention on the one location that was not subject to previous trenching along the southern Property line and disregards continuous core data that shows unfaulted near surface stratigraphy dated to be pre-Holocene deposition (i.e., not an active fault). As further proof that CGS is trying to reach its preordained position on where this fault is located, CGS, without any explanation, intentionally located their supposed fault a full 30 feet south of where USGS pointed to possible fault activity. If CGS were to locate the fault activity where the USGS located it (even though the USGS study was supposedly the basis for the “new information” CGS uncovered), CGS would not be able to claim an active fault as the 2015 Fault Study overlaps with the USGS interpreted possible fault zone showing continuous pre-Holocene deposition. Instead, CGS chose to manipulate the data to reach their desired conclusion.

But even this is misleading. The USGS Study cited by CGS does not dispute the 2015 and 2019 Fault Studies; it is agreeable with them. The faults inferred by the USGS survey can be evaluated for recency with significantly more accurate data generated by the subsurface investigations in 2015 and 2019 Fault Studies. The site-specific fault studies were specifically designed to evaluate the age of the faults (and proved them to be inactive and pre-Holocene), while the USGS methodology was not. In fact, USGS specifically disclaimed any attempt to date the fault, stating that its data provides “*little or no information about the rupture history of the fault traces.*” The age of the fault is, of course, determinative on whether the fault is active, so the USGS Study provides no scientific evidence of an active fault. Yet somehow, the CGS Letter misleadingly uses

Hollywood Center re CGS Letter.pdf

Mayer Brown LLP

Mr. Steve Bohlen

August 25, 2020

Page 7

the study to assert there is an active fault without definition in the context of an Alquist-Priolo Zone study nor the available stratigraphic context in the local area.

The CGS Letter also fails to mention that USGS urged “*extreme caution*” in evaluating its data because of the noisy conditions caused by high-cultural noise levels on North Argyle Avenue, heavy traffic along the 101 overpass and Hollywood Boulevard, and subway trains. Again, though, regardless of the reliability of the USGS data, the USGS Study did not attempt to ascertain the rupture history, which is determinative on whether the fault is active.

Finally, CGS’ attempt to bootstrap two other investigations (Ninyo & Moore, 2015; and Group Delta, 2015) cited in the USGS Study is of no moment. For one, USGS should have never calibrated their study with incomplete studies that required more investigation for fault determination when there was more reliable, City approved data available. And both investigations involved sites blocks away from the Property. Like the USGS Study, these investigations provide no scientific basis to question the findings of the site-specific Group Delta studies.

The 2015 Fault Study and the 2019 Fault Study, both conducted within the Property, represented an exhaustive subsurface investigation of the Property. Those studies were conducted by leading geologists, peer-reviewed by internationally-recognized experts, and approved by the City. All agree they clearly preclude the possibility of an active fault. Yet at the eleventh hour, CGS still refuses to accept the science and continues to chase a preordained conclusion that has been repeatedly disproven by the facts. This conduct appears to be part of a concerted, years-long effort to undermine the Hollywood Center Project, potentially in concert with Project opponents. If so, these actions put the reputation of CGS at great risk.

Based on our review of the relevant technical information, all of which is publically available, it is our opinion that the CGS Letter is either (i) extremely poor quality with no basis in science, (ii) intentionally misleading to achieve a preordained conclusion, or (iii) prepared by a government agency working in concert with local project opponents who continue to oppose and litigate the development of much-needed housing in Hollywood (this later point is highlighted by the apparent fact that CGS provided individuals opposing the Project with information related to the CGS Letter prior to the letter being finalized or provided to the public). In any of these instances, the actions of CGS must be investigated by a neutral third-party.

We respectfully urge you to immediately investigate this matter and ask that CGS either rescind its misleading letter or provide the necessary qualifications to make clear that the studies presented in that letter do not provide a scientific basis to infer an active fault on the Property.

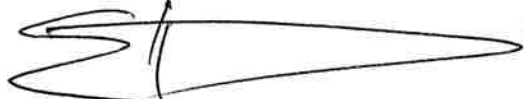
Hollywood Center re CGS Letter.pdf

Mayer Brown LLP

Mr. Steve Bohlen
August 25, 2020
Page 8

We are also simultaneously referring this matter to the Department of Consumer Affairs, Board for Professional Engineers, Land Surveyors, and Geologists to request a complete and transparent investigation into CGS' actions related to this matter.

Sincerely,



Edgar Khalatian
Partner

Department of Consumer Affairs, Board for Professional Engineers, Land Surveyors, and Geologists
California State Mining and Geology Board
California Board for Professional Engineers, Land Surveyors, and Geologists
The Honorable Gavin Newsom, Governor of California
Mr. Xavier Becerra, Attorney General of California
State Senator Ben Allen
Assemblymember Richard Bloom
Mr. Wade Crowfoot, California Secretary for Natural Resources
The Honorable Eric Garcetti, Mayor of Los Angeles
The Honorable Mitch O'Farrell, Councilman for the 13th District
Mr. Vince Bertoni, Department of City Planning, Director
Mr. Osama Younan, Department of Building & Safety, General Manager, Superintendent of Building
Ms. Luci Ibarra, Department of City Planning