

## Appendix C

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### Notice of Preparation Comment Letters

**CITY OF LOS ANGELES**  
INTER-DEPARTMENTAL CORRESPONDENCE

**DATE:** March 29, 2016

**TO:** Milena Zasadzien, City Planning Associate  
Major Proejcts Section  
Department of City Planning

**FROM:** Ali Poosti, Division Manager  
Wastewater Engineering Services Division  
LA Sanitation

**SUBJECT: SINGLE-FAMILY RESIDENCE IN STUDIO CITY – NOTICE OF PREPARTION OF EIR**

This is in response to your February 9, 2016 letter requesting a review of your proposed project located at 3599 Lankershim Blvd, Los Angeles, CA 90068. LA Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project.

**WASTEWATER REQUIREMENT**

LA Sanitation, Wastewater Engineering Services Division (WESD) is charged with the task of evaluating the local sewer conditions and to determine if available wastewater capacity exists for future developments. The evaluation will determine cumulative sewer impacts and guide the planning process for any future sewer improvements projects needed to provide future capacity as the City grows and develops.

**Projected Wastewater Discharges for the Proposed Project:**

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
<b><i>Existing</i></b>			
Vacant Lot	0	0	0
<b><i>Proposed</i></b>			
Residential: SFD-3BDRMS	230 GPD	1	230
Residential: SFD->3BDRMS	45 GPD	1	45
Swimming Pool	3,000 ft <sup>3</sup>	1	22,442
<b>Total</b>			<b>22,717</b>

## SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes an existing 8-inch line on Lankershim Blvd R\W. The sewage from the existing 8-inch line discharges into a series of 12-inch and 15-inch pipes until it reaches a 24-inch sewer line on Lankershim Blvd R\W. Figure 1 shows the details of the sewer system within the vicinity of the project.

The current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity
12	Lankershim Blvd	33	1,246,703 GPD
15	Lankershim Blvd R\W	24	6,367,687 GPD
24	Lankershim Blvd R\W	41	9,503,167 GPD

Based on the estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project. Further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. Ultimately, this sewage flow will be conveyed to the Los Angeles County sewer network, please contact county as further analysis may be needed.

If you have any questions, please call Kwasi Berko of my staff at (323) 342-1562.

## **STORMWATER REQUIREMENTS**

LA Sanitation, Watershed Protection Division (WPD) is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles. We anticipate the following requirements would apply for this project.

## POST-CONSTRUCTION MITIGATION REQUIREMENTS

The project requires implementation of stormwater mitigation measures. These requirements are based on Stormwater Low Impact Development (LID) requirements. The projects that are subject to LID are required to incorporate measures to mitigate the impact of stormwater runoff. The requirements are outlined in the guidance manual titled "*Development Best Management Practices Handbook – Part B: Planning Activities*". Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at: [www.lastormwater.org](http://www.lastormwater.org). It is advised that input regarding LID requirements be received in the early phases of the project from WPD's plan-checking staff.

## GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-way to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the LID requirements.

## CONSTRUCTION REQUIREMENTS

The project is required to implement stormwater control measures during its construction phase. All projects are subject to a set of minimum control measures to lessen the impact of stormwater pollution. In addition for projects that involve construction during the rainy season that is between October 1 and April 15, a Wet Weather Erosion Control Plan is required to be prepared. Also projects that disturb more than one-acre of land are subject to the California General Construction Stormwater Permit. As part of this requirement a Notice of Intent (NOI) needs to be filed with the State of California and a Storm Water Pollution Prevention Plan (SWPPP) needs to be prepared. The SWPPP must be maintained on-site during the duration of construction.

If there are questions regarding the stormwater requirements, please call Kosta Kaporis at (213) 485-0586, or WPD's plan-checking counter at (213) 482-7066. WPD's plan-checking counter can also be visited at 201 N. Figueroa, 3<sup>rd</sup> Fl, Station 18.

## **SOLID RESOURCE REQUIREMENTS**

The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact Daniel Hackney of the Special Project Division at (213)485-3684.

KB/AP:as

Attachment: Figure 1 – Sewer Map

c: Kosta Kaporis, LASAN  
Daniel Hackney, LASAN  
Eduardo Perez, LASAN







From: [Milena Zasadzien](#)  
To: [Laura Male](#)  
Subject: Fwd: Case No: ENV-2014-4031-EIR  
Date: Thursday, February 18, 2016 10:44:13 AM

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----- Forwarded message -----

From: **William DeWitt III** <[bdewitt@cardinals.com](mailto:bdewitt@cardinals.com)>  
Date: Thu, Feb 18, 2016 at 8:25 AM  
Subject: Case No: ENV-2014-4031-EIR  
To: "[milena.zasadzien@lacity.org](mailto:milena.zasadzien@lacity.org)" <[milena.zasadzien@lacity.org](mailto:milena.zasadzien@lacity.org)>

Case No: ENV-2014-4031-EIR

Project Name: Single-Family Residence in Studio City

Applicant: Jayesh Kumar

Address: 3599 Lankershim Blvd.

I am writing to offer my comments as requested by the Notice of Preparation Environmental Impact Report of Feb 9, 2016 that I received by virtue of being an adjacent property owner to the project.

As you can see from the attached picture from our back yard, the view of the proposed site shows a pristine valley, with only one visible house that disrupts the continuity of the canyon trees.

From the plans described, it appears that the residence in question would add another house to this view corridor. While I don't oppose development in general, I want to make sure it is sensitive to the surrounding landscape. Therefore, I would request that the owner remove as few trees as possible, and also that the color choice for roofing materials be on the darker side. I would hope the project would also be sensitive to the family of deer that permanently roam the canyon, just above the proposed site.

Thanks for hearing my concerns,

Bill DeWitt

Owner, 10829 Alta View Dr.

Studio City, CA 91604



**From:** [Milena Zasadzien](#)  
**To:** [Laura Male](#)  
**Subject:** Fwd: Our Response to February 6, 2016 Notice of Preperation of EIR: Case # ENV-2014-4031-EIR  
**Date:** Thursday, March 10, 2016 2:47:34 PM  
**Attachments:** [Kammerer and Masterman Report 001.tif](#)  
[response to Patel"s NOP.doc](#)

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Milena Zasadzien  
Los Angeles Department of City Planning  
6262 Van Nuys Blvd. Rm 351. Van Nuys. 91401  
p 818.374.5054 f 818.374.5070 e [milena.zasadzien@lacity.org](mailto:milena.zasadzien@lacity.org)

----- Forwarded message -----

**From:** **Melora Harte** <[m4harte@sbcglobal.net](mailto:m4harte@sbcglobal.net)>  
**Date:** Thu, Mar 10, 2016 at 1:46 PM  
**Subject:** Our Response to February 6, 2016 Notice of Preperation of EIR: Case # ENV-2014-4031-EIR  
**To:** Milena Zasadzien <[milena.zasadzien@lacity.org](mailto:milena.zasadzien@lacity.org)>

Dear Ms. Zasadzien,

Please find our response in the form of 2 attachments, which contain our comments as to the scoop and content of the EIR on 3599 Lankershim Blvd., L.A. 90068. We will also hand deliver a hard copy to you within the next hour, so you will have both by 2:30PM, as we are aware the deadline is 4PM today.

Thank you.

Melora Harte  
Kenneth Krasney

3600 Lankershim Blvd.  
Los Angeles, Ca 90068  
[m4harte@sbcglobal.net](mailto:m4harte@sbcglobal.net)

Melora Harte & Kenneth Krasney

3600 Lankershim Blvd.

Los Angeles, Ca. 90068

(818) 439-9516

m4harte@sbcglobal.net

March 9, 2016

Attn: Milena Zasadzien

Department of City Planning/Major Projects Section

6262 Van Nuys Blvd.

Room 351

Van Nuys, Ca. 91401

(818) 374-5054

milena.zasadzien@lacity.org

**Re: Notice of Preparation Environmental Impact Report, Case no: ENV-2014-4031-EIR**

Dear Ms. Zasadzien,

The following needs to be addressed in the EIR: 3599 Lankershim Blvd. lists a lot size of 22,282. However, not all of this lot is buildable. It is adjacent to Parkland, APN 2380-005-900. The MSPSP rules state that any development must be at least 200 feet from Parkland. Sapphos Environmental, Inc. says the above is not listed as Parkland on the lamountains.com. site. However, the LA Mountains site **only** lists the major parklands in the state. APN 2380-005-900 is just three-fourths of an acre, but it is indeed parkland. In addition, this property and the proposed project site are both parts of the wildlife corridor, connecting Griffith Park and Fryman Canyon. APN 2380-005-900 was donated by the Cloggers Trust to the Santa Monica Conservancy on August 1, 2005, for the express purpose of turning it into parkland and preserving the wildlife corridor.

Also, there are 3 springs and a stream taking up a portion of the proposed project site at 3599 Lankershim, as well as a riparian habitat used by the deer, coyotes, raccoons, opossums and other wild animals that live there. According to The MSPSP ordinance there can be no construction within 100 feet of a stream. Any digging and building on this lot will destroy the springs and stream as noted by both Frank Dennison, Geotechnical Consultant\* and Martin Kammerer, Fluvial Geomorphologist.\*

The developer/owner, formerly Guntant Patel and Ken Patel/Kumar, now listed as Jayesh Kumar, states that the property is accessed via a joint easement through two adjacent single family parcels. In actuality, there is only one single family residence using this easement. The other parcel is undeveloped land.

Sapphos Environmental mentions the blue-line stream, but not the three springs from which the stream emanates. The proposed construction calls for a partial alteration of the stream. The EIR needs to analyze this thoroughly. The blue line stream flows alongside the easement driveway, which my husband and I own, all the way to Lankershim Blvd. The stream is between the easement driveway and a row of twelve thriving mature oak trees. These trees are at least a hundred and fifty years old. The stream provides the only water source for them. Any alteration, partial or otherwise, will upset the eco- balance of our land. And with the severe drought that California is experiencing, this stream water is essential to the trees' survival. Also, the EIR needs to analyze the utilities easement for the 3599 Lankershim proposed project, and the impact this easement will have on the oak trees. Mr. Kumar's utilities easement runs all the way along and through the stream area of our property to the street. Any digging to install gas lines, sewer lines, power cables, and whatever else is needed for Mr. Kumar's project, will be in the exact same area as the stream and the root system of the oak trees, which begin at the top of the easement and continue all the way to the street. The proposed project will have a severe, irreversible impact on these trees.

Inaccuracies in the NOP that need to be addressed in the EIR are as follows: There is no overflow drainage pipe from the project site leading to Lankershim Blvd. to carry off the storm water that will be present once 3599 Lankershim is developed. The existing pipe along the edge of the easement driveway is carrying excess runoff water from the springs, not storm water. There is no storm drain in the vicinity as stated in the NOP. Also, the noise factor that this project will cause has not been adequately explored. Mr. Kumar's parcel of land is located in a drainage canyon between Alta View, Wrightwood Court and Terryview Drive above, and the Soluk's property at 3601 Lankershim Blvd. below. The "echo" factor of placing a residence in this canyon location has not been calculated.

The EIR must address the export of soil which will exceed export levels. This excessive soil removable will adversely affect the stability of the hillside. In addition, Mr. Denison's

concerns about building in a drainage canyon in the immediate vicinity of a significant fault must be addressed. He states that retaining walls and compacted fills required for this project will bury the springs and the natural drainage course. Sub-drains will have to be created which will cause the existing water to rise, and over time, as the sub-drains become clogged with soluble salts, they will cause this slope property to fail and bring down the surrounding slope properties as well. Under CEQA, an EIR must consider the long term environmental impacts of a project.

CEQA guidelines state that an EIR must describe reasonable alternatives that would avoid the significant impacts of the project and evaluate the comparative merits of the alternatives. A swap property is a reasonable alternative and must be considered when a proposed project will have adverse effects on the environment, as is the case with this project. There is an available swap property, with a view, in close proximity on Terryview Drive, next to 10940 Terryview, with none of the cumulative impacts of the 3599 Lankershim Blvd. site.

\* Dennison & \*Kammerer reports attached.

July 24, 2006

Scientific clarification as to the content and findings of a previously filed document entitled:

**"Geomorphological and Hydrological Evaluation  
of a Spring and Riparian Wetland at:  
3599 Lankershim Blvd. Studio City, CA  
August 14, 2005"**

and rebuttal and discussion of several findings presented by the CEQA  
lead agency for public review

**A. Summary**

The purpose of this document is to re-iterate several findings contained in a previous report, and to discuss the scientific findings in light of several documents pertaining to the current CEQA process conducted by the City of Los Angeles City Planning Department.

This work was funded by petitioners Melora Hartc and John Soluk in response to the filing of a notice of determination, conditional approval, appeal and appeal staff report CASE # DIR 2001-8984-DRB-SPP-A1, CEQA ENV 2003-9111-MND, and the issuance of a Streambed alteration agreement (SAA # 1600-2005-279-R5) by State of California Department of Fish and Game.

**B. Substantial evidence found during scientific field investigation on 8/11/ 2005:**

1. The wetland and spring was situated below the confluence of two small ephemeral drainages immediately adjacent to a vertically tilted finely bedded sandstone outcrop.
2. This is a typical location for a natural spring in this area of the Santa Monica Mountains where porous sedimentary deposits, which store and convey groundwater, meet dense impermeable bedrocks such as basalts. It is at these boundaries where groundwater is precluded from further gravity induced movement through porous media and is forced to the surface in form of springs.

downstream.

4. At the time of the site visit, the discharge from the spring was estimated at about 2.5 gal/min.
5. The most immediate evidence of the presence of a perennial water source on the property is a small depression with open water surface next to the existing driveway.
6. There was clear evidence that the spring exceeded the mere size of a "puddle". A much larger area adjacent to the depression has been previously filled in with up to about 4 ft. of artificial gravelly fill. This is clearly evidenced by several buried willow trunks in the area.
7. Despite the existing artificial fill, there is significant evidence that ground water has been surfacing in this area regularly.
8. The moist bottom area of the spring extends into the property -- approximately to the boundary of the exposed sand stone outcrop.
9. The sedimentary rock contains significant amounts of moisture at its base leading to increased amounts of rock weathering. This was taken as evidence that water is currently present and that it has been present at this location for historic periods of time.
10. Further evidence of permanently wet ground is the presence of riparian vegetation such as large arroyo willows and dense blackberry stands.
11. There is evidence of a small stream channel traversing the entire flat area between sandstone outcrop and the beginning of the driveway indicating intermittent surface flows emanating from the sandstone outcrop.

### **C. Scientific Conclusions Based on Substantial Evidence:**

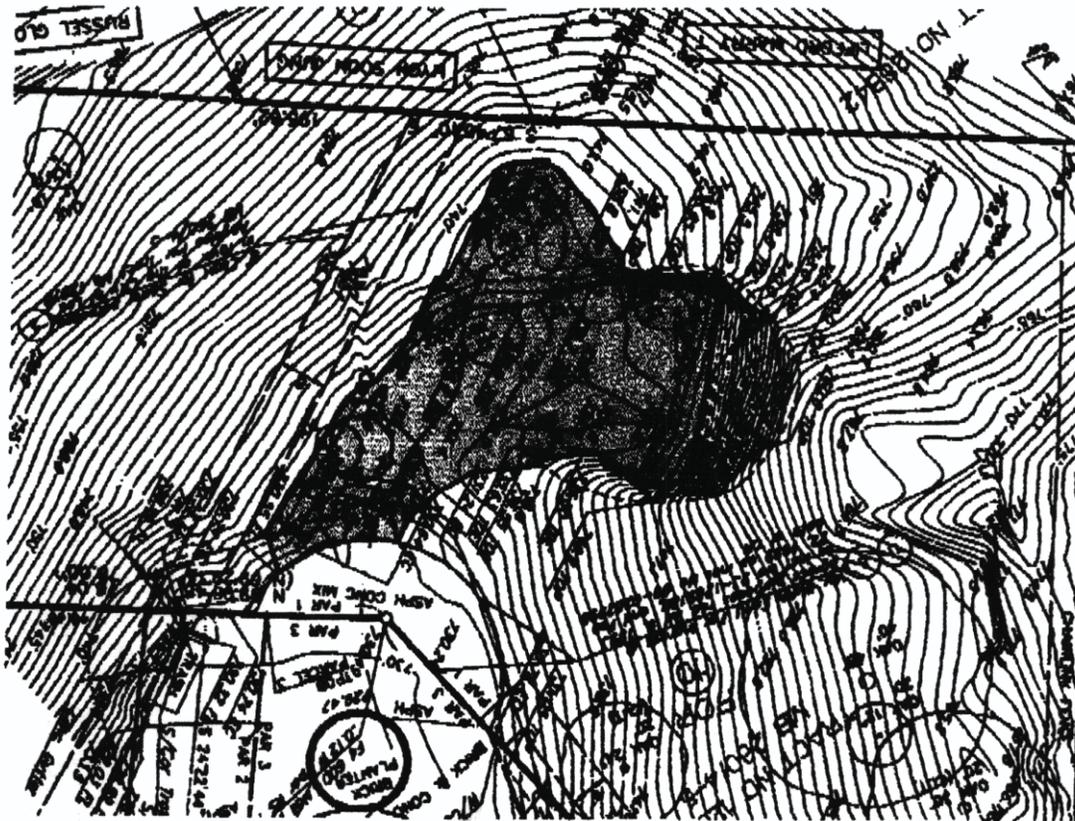
1. Predicated upon the above findings of fact it is my professional opinion that the exposed sandstone constitutes the actual spring and that this type of spring is consistent with many other springs in this area of the Santa Monica Mountains.
2. Although it clearly appears that attempts were made to fill-in and otherwise degrade the existing wetland and stream, both vegetation and permanently wet ground clearly indicate the constant presence of water.
3. The small stream channel functions to drain the area and shows that groundwater levels at the site frequently rise to the surface and inundate an extended area. It is estimated that this happens approximately every other year and this is equivalent to the 1 or 2 year "bankfull" stream discharge.

the spring they should be considered equivalent to wetland soils as their special characteristics are the result of continuous presence of water.

5. It is my professional opinion that the physical size, of this natural resource have been underestimated in the revised MND.
6. It is my personal opinion that the finding of Arroyo Willow and Blackberry in a riparian or wetland environment would warrant classification of "Arroyo Willow and Blackberry Riparian (61.201.03) plant community [Salix lasiolepis/Rubus spp.]

(Department of Fish and Game, The Vegetation Classification and Mapping Program, List of California Terrestrial Natural Communities Recognized by The California Natural Diversity Database, September 2003 Edition)

7. Based on the field evidence of the presence of water, soil and weathering patterns indicative of presence of water, and the extent of the Arroyo Willow and Blackberry Riparian plant community, a spatial delineation of the wetland, spring, and stream channel was produced (Figure 1 and 2). The total area designated riparian or wetland on this delineation is about 2350 square feet.



#### **D. Rebuttal of Statements by City Planning Staff**

In response to reference made to my initial study (dated August 14, 2005) in the "Appeal Staff Report", I shall now clarify several points with regard to the substantial evidence I had produced and the conclusions I had drawn.

Regarding the determination of the historic extent of the springs and their inclusion on geologic maps, it is my professional opinion that thorough analysis of all data, including that contained on historic maps, must be considered in any credible investigation regarding potential impacts. Knowing that there was environmental damage at the site, a qualified professional approach would be to take all historic data into account and then determine the extent to which historic riparian and wetland characteristics remain at the site today. This would then be followed by an informed analysis of all existing site characteristics including more recently developed characteristics.

It is my professional opinion that substantive alterations of the terrain had taken place at the site. However, significant and substantial elements of the original springs and wetlands remain evident at the site. These are consistent with those contained in historic documents. It is also evident that a significant degree of natural recovery has taken place in addition to the development of new riparian habitat following human disturbance.

In a confusing argument City planning staff suggest that I had attempted to delineate the historic extent of the springs by analysis of the sandstone outcrop, and that my analysis is somehow flawed in that the historic geologic map does not show a sandstone outcrop.

In fact, the intent of my study was to determine the current status of the springs, stream channel, and wetland, and to perform an independent assessment of the area based on factual evidence determined in the field. My analysis also included the review of historic sources, review of the data presented in the MND, and the review of a spring study previously conducted by Parsons Engineering.

Contrary to the suggestion of the City planning staff, I had independently determined that the current source of the water is at the base of the coarse sandstone outcrop consistent with similar springs in the surrounding area. The absence of the sandstone outcrop on the historical map is not proof that the sandstone layer is not the source for emanating spring water. It is my professional opinion that the exposed sandstone was historically and is presently the source of water, regardless of any alterations that may have taken place in the past.

water moves downhill, either at the surface as evidenced by the small stream channel right below the sandstone outcrop, or underground through regolith or soil. Corroborating evidence is the fact that sandstone weathering is locally accelerated through constant presence of water, moist ground at the base of the sandstone outcrop, and the fact that a row of arroyo willows lines the flow line starting at the outcrop.

## **E. Conclusions**

The "Appeal Staff Report" suggests that the director, based on reports by "qualified individuals", determined that the project impact would be limited to 19 ft<sup>2</sup> of riparian habitat. My initial report produced substantial evidence that the extent of the riparian habitat was underestimated.

My analysis, based on field investigation of current conditions in the vicinity of the spring, shows that the existing permanently moist riparian habitat at the site totals approximately 2350 ft<sup>2</sup>. Because much of the water emanates from a sandstone outcrop that would be buried under the driveway of the proposed structure, and because this area would be contained by a retaining wall, there is a clear potential that the project would impact this entire riparian area by possibly impeding or cutting off natural flow to it.

In studying the MND it is evident that the cited "qualified individuals" had determined that an area of only 19 ft<sup>2</sup> constituted the only affected riparian habitat at the site. It is my professional opinion that they had not seriously considered many of the facts that are commonly considered when determining the extent of riparian habitat.

Most importantly, it is my opinion that the determination of plant communities in the MND constitutes an unethical equivalent of biological "gerrymandering". The "qualified biological reports" suggest that a spatially distinct grouping of Arroyo Willows with Blackberry constitute a subset of the Mule Fat Scrub plant community. They had in fact subsumed the Arroyo Willow Blackberry Riparian group into the Mule Fat plant community that exists in the dry ephemeral channel areas uphill of the springs. By doing so they eliminated a riparian association that is considered rare and worthy of consideration by the California Natural Diversity Database (CNDDDB). Because any student of cartography, urban planning, geography or environmental science should be aware of this procedure designed to make "minority populations" disappear from a spatial data set, I find it astonishing that City planning and CDFG

In light of clear field evidence that in no way conflicts with historical accounts of the area, I conclude that City planning staff, the director, the applicant, and the California Department of Fish and Game erred in their assessments of the extent of riparian habitat and the physical nature of the springs at the site. In conducting prudent field analyses in connection with the available historical data it is inconceivable that qualified personnel would underestimate the existing natural resources of a site by such a large degree.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'M. Kammerer', followed by a long horizontal line that ends in a small loop.

Martin Kammerer, Ph.D.

April 9, 2004

File # 04-4331

Chatten-Brown and Associates  
3250 Ocean Park Boulevard, Suite 300  
Santa Monica, California 90405

**Subject:** Negative Environmental Impacts  
3599 Lankershim Boulevard, Lot 10, Tract 12578  
Los Angeles, California

- Reference:**
- 1.) Brian A. Robinson & Associates, Inc. Geotechnical Investigation-Update Report for 3599 Lankershim Boulevard, dated September 10, 1999
  - 2.) Brian A. Robinson & Associates, Inc. Supplemental Geotechnical Letter for 3599 Lankershim Boulevard, dated October 20, 1999
  - 3.) Brian A. Robinson & Associates, Inc. Geotechnical Update Letter for 3599 Lankershim, dated March 11, 2002
  - 4.) Frank E. Denison, Geologic Literature Review and Compilation of Data for Proposed Residence, Lot 10, Tract 12578, 3599 N. Lankershim Blvd., Los Angeles

#### Introduction

As requested by the law office of Chatten-Brown and Associates, this office has reviewed the above referenced documents, review pertinent geotechnical data, consulted with Mr. Frank E. Denison, Engineering Geologist, and reviewed geologic map information for the subject property and it's surrounding areas.

The site is located in the immediate vicinity of a significant fault, the Benedict Canyon Fault Zone, Dibblee, 1991. This zone is located to the west of the subject property. The project engineering geologist, (Reference #4) has indicated that there are numerous splays to the fault, that it is a known ground water barrier, has caused numerous parallel faults, and drag folds. Many of these drag folds are perpendicular to the faults. This additional faulting along the Benedict Canyon Fault zone provide a secondary porosity to the adjacent bedrock. This porosity and the numerous drag folds direct the groundwater towards the fault where it ponds up behind the fault .

The subject property consists of a reentrant drainage canyon with slopes that ascend on three sides of the site. This site topography directs both the surface drainage and the subsurface drainage towards the subject property. A spring is located on the east side of the site (see reference #1). This spring is a direct result of the adjacent Benedict Canyon Fault. A surficial slope failure was recognized and described in references #1 and #2.

The proposed development will occupy the end of the reentrant canyon. This will require the construction of retaining walls and compacted fills to raise up the existing topography and to create more useable building space. This fill will occupy a majority of the canyon floor. The fills will bury the spring, the natural drainage course and will block any surface drainage from the surrounding slopes.

The bedrock materials contain calcium sulfates and calcium carbonate salts. These materials have been observed in cut slopes made into bedrock similar to that encountered at the site. This office has performed numerous investigations in the general area of this project and have encountered these materials in the site bedrock.

### Conclusion

Faulting within the site bedrock creates zones of increased porosity in the adjacent bedrock, hence increased water migration towards the fault. The Benedict Canyon Fault is a groundwater barrier which collects and direct water to specific areas, as depicted by springs and sag ponds, Reference #1). These conditions can create conditions conducive to landsliding and shallow slope failures.

A slope failure has been described and reported on in reference #1. This failure is located on the west side of the canyon in the same general vicinity as the Benedict Canyon Fault. This failure is reported to be the result of past heavy rains. Additionally this failure is also the result of the groundwater build up created by the adjacent faulting.

Springs and seeps along the Benedict Canyon Fault Zone are known to have soluble salts that clog subdrains, gravel blanket drains and geofabric drains.

The proposed construction will be placed in a drainage canyon, over a spring, and will block the existing natural drainage. The proposed construction will use a subdrain, beneath the proposed compacted fills in the canyon bottom, and a back drain system, behind the retaining walls, to relieve the excess hydrostatic forces. The existing spring will also be fitted with a pipe and gravel subdrain to remove the water from the spring.

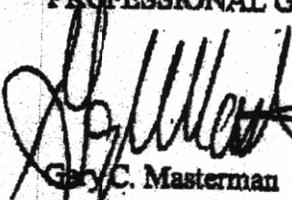
This system will function for a time until the back drain and subdrain system clogs with the soluble salts. Once the below surface drains plug the water levels will rise causing settlement of the compacted fills, surficial and gross failures of the fill slopes and failure of the surrounding slopes.

During the time while the under drain system still functions (prior to the openings in the gravel blanket and the holes in the pipes plugging with the precipitated salts) slope failures in the western slopes are to be anticipated. These failures could have an adverse impact on adjoining properties.

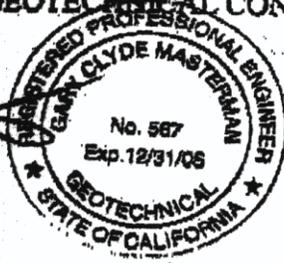
If you have any questions, please do not hesitate to contact this office.

Respectfully submitted:

PROFESSIONAL GEOTECHNICAL CONSULTANTS, INC.



Gary C. Masterman  
Chief Engineer  
GE 567



GCM: 04-4331.01L

- Dist: (4) Addressee  
(1) Frank E. Denison  
(1) File

**From:** [Milena Zasadzien](#)  
**To:** [Laura Male](#)  
**Subject:** Fwd: Comments NOP ENV-2014-4031-EIR 3599 Lankershim due 3.10.2016  
**Date:** Thursday, March 10, 2016 2:45:36 PM

---

DEIR comment, see below

Milena Zasadzien  
Los Angeles Department of City Planning  
6262 Van Nuys Blvd, Rm 351, Van Nuys, 91401  
p 818.374.5054 f 818.374.5070 e [milena.zasadzien@lacity.org](mailto:milena.zasadzien@lacity.org)

----- Forwarded message -----

**From:** Joyce Dillard <[dillardjoyce@yahoo.com](mailto:dillardjoyce@yahoo.com)>  
**Date:** Thu, Mar 10, 2016 at 1:18 PM  
**Subject:** Comments NOP ENV-2014-4031-EIR 3599 Lankershim due 3.10.2016  
**To:** Milena Zasadzien <[milena.zasadzien@lacity.org](mailto:milena.zasadzien@lacity.org)>

Please review the LA MS4 Municipal Separate Storm Sewer Permit and the Enhanced Watershed Management Plans for hydrology and water quality. They can be found at:

[http://www.waterboards.ca.gov/losangeles/water\\_issues/programs/stormwater/municipal/index.shtml#los\\_angeles](http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/index.shtml#los_angeles)

The Enhanced Watershed Management Plans can be found at:

[http://www.waterboards.ca.gov/losangeles/water\\_issues/programs/stormwater/municipal/watershed\\_management/index.shtml](http://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/watershed_management/index.shtml)

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