



June 17, 2013

Zoning Administrator
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Los Angeles City Hall
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Office of Environmental Planning
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Los Angeles, CA 90012

Re: ***ENV-2012-131-MND, June 17, 2013; 16990 – 17009 W. Sunset Blvd., Pacific Palisades, CA.***

Zoning Administrator Daniel Skolnick and Environmental Planner Darlene Navarrete

The Pacific Palisades Community Council (PPCC) has been the voice of the community for more than forty years. The public record will evidence that, on April 10, 2012 and February 23, 2013, PPCC submitted comments and concerns upon which the council based its request for the City of Los Angeles to require that a Focused Environmental Impact Report (EIR) be prepared for this proposed multi-family residential development.

Since then new information has come to our attention that reiterates the need for a Focused EIR. This includes the MND, and reports from two independent geologists who have studied the property and who have raised major hydrology concerns about this unstable area of Pacific Palisades.

PPCC is concerned because the independent geologists question the accuracy of the initial Ground Water Flow Rate Report by E.D. Michael. They believe that report is based on one limited source, and they list several areas that need to be readdressed to give a true picture of this location. These include, but are not limited to, the calculation of rainfall for the area, as well as the calculation of the flow of water from the sides of the site. Full reports were recently submitted in letters from GeoConcepts, Inc. and from Ralph Stone and Company.

Based upon PPCC's review of this additional information, and the fact that the boilerplate mitigation measures set forth in the MND may not be adequate for this potentially hazardous hillside project, PPCC hereby reiterates its prior request that a Focused EIR be prepared for this project including (1) geology, soils and hydrology, (2) haul routes and (3) traffic ingress and egress.

Of paramount concern to PPCC at this time are the hydrology characteristics/specifications of the property, drainage requirements and the ability of the property owner to obtain requisite easements upon which development is premised. Thus, we hereby request that the Focused EIR previously advocated now be expanded to include additional assessments including (4) storm drain/ sewer access and (5) any/all on-site Torrey Pines.

Finally, PPCC hereby requests that any/all Coastal Commission applications and guidelines be examined and sufficiently reviewed by the City of Los Angeles to ensure that this proposed project is in full compliance with all applicable laws. PPCC requests that this letter and PPCC previous submittals be included in the record.

Sincerely

Barbara Kohn
President
Pacific Palisades Community Council

Cc
Councilmember Bill Rosendahl
Councilmember elect Mike Bonin
Norman Kulla. CD 11