CHRISTIAN T. MARTIN

June 16, 2013

Ms. Darlene Navarrete
Department of City Planning
City Hall, Room 750
200 N. Spring Street
Los Angeles, CA 90012

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By Facsimile: (213) 978-1343

Re: ZA 2012 130 CDP – Application for Coastal Permit – Project 16990-17000 Sunset Blvd., Pacific Palisades, CA – Proposed Mitigated Negative Declaration ENV-2012-131-MND

Dear Ms. Navarrete,

Thank you once again for allowing our community to comment to the City of Los Angeles ("City") on the Proposed Mitigated Negative Declaration ("MND") dated June 17, 2013 for the development cited above. As has been previously noted on an ongoing basis by concerned citizens in correspondence to your office, the local community is deeply concerned about the development and the negative impact it will have on the geological, hydrological, and overall environmental integrity of the 17000 Sunset Boulevard lot and adjacent areas of land.

In light of the catastrophic consequences to the health, safety and welfare of our community and its residents (landslides, flooding, pedestrian and driver peril, etc.) should applicant's proposed development run afoul of required city and state regulatory compliance requirements, the community has taken a "hard look" at the applicant's proposed plans, materials and mitigation measures under the MND. This has included an

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exhaustive examination of information provided by the applicant's experts, the hearing of comments made at the recent applicant presentations, including at meetings of the Pacific Palisades Community Council and the affiliated local Land Use Committee meeting, and the procurement of independent expert research into many of the paramount issues of community concern. Based on these items collectively, and a thorough review of the MND and applicant's explanatory statements and proposed mitigation measures, it is concluded that the MND grossly fails to address the threshold areas of environmental impact and community concern and a Focused Environmental Impact Report ("EIR") should be required of the applicant. An EIR in this instance should be required as such a report would necessarily address all areas of impact and concern in requisite detail and provide the proper vehicle for public and regulatory evaluation of the proposed development's safety and regulatory compliance.

There exist five (5) immediate areas of concern not comprehensively addressed in the MND that lack adequate mitigating measures which should be addressed through an EIR:

I. The destruction of both existing landforms and one of the area's last remaining visual resources should be examined in further detail in light of the development being developed on a protected view corridor.

II. The geologic stability of the property intended to support the development should be further evaluated due to its very high risk of landslides and slope failure and all such risks must be definitively mitigated.

III. Unique hydrologic aspects of the geology currently existing and soon to be underlying (or surrounding) the proposed development should it be constructed will profoundly impact both the land intended to support the development and the surrounding neighborhood, including the main community egress and ingress route - Sunset Boulevard, and must be evaluated in further detail with all hazards mitigated.

IV. Traffic safety and management, including with respect to pedestrian traffic and the cumulative effects of other local large-scale development, must be examined in further detail and all risks of harm and dangerous conditions mitigated.

V. Hazards and hazardous material, including those currently existing on and under the site, as well as those created from the excavation of the site, must be examined in further detail and respectively mitigated.

1) <u>The Proposed Development Has A Profound and Adverse Impact on Area Aesthetics</u>.

Within the MND, specifically section I. Aesthetics, the applicant notes that the proposed development has less than a significant impact on the local scenic vista and only a potentially significant impact on the visual character of the site and its surroundings. In each instance, this is wholly inaccurate, as the development completely degrades and destroys the aesthetics of the development site. Further, the applicant notes that the site placement and massing will preserve a southerly view, which is inconsequential when evaluated in light of the entire development as the remaining view

post development will not provide an appreciable or genuine public view. Namely, the development will cover approximately 95% of the view site, blocking the majority of current points of view with a massive structure 43 feet high (not including the height of the ventilation components and elevator tower) and 180 feet long. There will be no actual view of the Pacific Ocean, adjacent bluffs and foothills from the westbound, northbound or eastbound directions on Sunset Boulevard, including no material view whatsoever from the major community street Marquez Avenue. The current scenic vista offered by the site is one of the last ocean facing vistas available to the public as Sunset Boulevard winds its way into the urban city. It is crucial this view resource is preserved.

The destruction of this scenic resource, and the deleterious impact on the city-designated Scenic Major Highway (applicant acknowledging such designation), runs wholly counter to the guidelines of the Coastal Act. Namely, as the development requires a Coastal Development Permit, and the development will be wholly viewable from two (2) Scenic Corridors, Sunset Blvd. and the Pacific Coast Highway, it is subject to Public Resources (Coastal Act) Code Section 30251 which states:

"The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect view to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and where feasible, to restore and enhance visual quality in visually degraded areas."

In no manner does applicant's proposed development's design protect the view resource, rather, it wholly destroys it, nor does it mitigate this destruction. And this is a design choice by the applicant. Moreover, a similar large scale development less than 260 feet east of the applicant's site, which is a pending development approval, designed its development layout and incorporated mitigating efforts in design such that scenic views from Sunset Boulevard, in all directions were preserved, demonstrating a conscious attention to the requirements of the Coastal Act and community concern by implementing bona fide mitigating designs.

Moreover, the development will substantially degrade the visual character and quality of the site and its surroundings by wholly excavating the site, including not only a portion of the land which is fill dirt, but all adjacent areas of native bluff land, wholly destroying what is now a predominant coastal bluff. Again, unlike the above noted 17030 Sunset Blvd. concurrent development, which intends to integrate significant mitigating measures to not alter the site, rather building down the site below Sunset Boulevard, the applicant has implemented no meaningful mitigation actions in the MND or the applicant's plans with respect to the physical degradation of site geology and view resources.

2) <u>Geology And Soils – Unmitigated Impacts</u>.

As noted by the applicant in the MND, the subject site is located both on a hillside and within a landslide zone. More accurately, the site is proposed to be situated on an unstable V shaped canyon after the removal of supporting fill "materials" and partial canyon, such canyon also serving as a natural stream and reservoir for the neighborhood's underground and topical water runoff. Any unanticipated (or anticipated)

land slides or similar geological instability in this area due to excavation and building weight, as well as seismic occurrences, could have a catastrophic impact on not only the adjoining buildings and residents on each side of the proposed site, but also Sunset Blvd., a main access artery for approximately 27,000 Pacific Palisades residents and emergency services. There exist abundant and decades of ongoing examples of geologic instability in this very area, including the Bernheimer Gardens landside that totally rendered a lot but a few hundred feet away from the proposed development site virtually unusable for any structural development.

Applicant's mitigating measures proposed relating to site geology under the MND are not adequate with respect to such a dangerous and unpredictable site. Were this a solid flat pad development, situated on a geologically and hydrologically stable plot of land, a simple reference to California Building Code and Department of Building and Safety standards would be adequate. However in this instance, due to the acknowledged site instability and unique hydrology, significantly more diligence is required as the stakes to life and property are exponentially increased.

Further, the unique and dangerous aspects of this site require that the applicant proposed geotechnical report by a registered civil or certified engineer assessing the consequences of a landslide, soil displacement, lateral movement or reduction in foundation soil-bearing capacity, be conducted as part of the current site/application review and not after it, as the applicant intends. Moreover, with such a sensitive development site, clear and specific mitigation efforts must be delineated to include building design considerations, not limited to, ground stabilization methods, selection of appropriate foundation types and depths, and selection of appropriate structural systems to accommodate anticipated displacements or any other slide or alteration in the character of site geology. The applicant cannot delay preparation of a geotechnical report that would necessarily address these items, as proposed in the MND, and claim requisite mitigation will be provided after the report is prepared, as that is no mitigation whatsoever.

The MND and supporting documents and comments provided by the applicant and the applicant's hired consultants in no manner or extensive detail address the many geological problems associated with the massive and heavy weighted development. Further, the materials prepared by the applicant and relied upon to complete the MND by the applicant were scrutinized and deemed questionable in many areas by independent third party consultants. These consultants, namely GeoConcepts, Inc. ("GeoConcepts") and Ralph Stone Company, Inc. ("R. Stone") were engaged to review prior studies and materials provided by the applicant. Areas of concern identified by the consultants requiring more specific information and study included questions regarding clay gouge being a potential slide plane, landslide plane and shear strength inconsistencies, and inconsistencies with the slope stability analysis, (as outlined in the attached GeoConcepts project review), as well as concerns with shear strength data, fill/colluvium strengths, and slope stability analysis using measuring coefficients not in accordance with LADBS guidelines (as outlined in the attached R. Stone project document), among other items. Additional concerns are illuminated in the GeoConcepts and R. Stone reports attached and should be incorporated into this correspondence by reference.

Moreover, without adequate and non-conflicting factual information, the mitigation items noted on the MND with respect to geology are unreliable and inadequate necessitating further examination via an EIR. A detailed EIR evaluating such issues is of vital importance to the safety of community residents whose lives and property could be in jeopardy in the adjoining properties, and the safety and welfare of dozens of residents residing in the Malibu Village properties below the proposed development site.

3) <u>Hydrology And Related Issues and Lack of Adequate Mitigation</u>.

As noted above, due to unique geology, the proposed development site sits directly on a natural underground waterway and watershed area for the entire surrounding neighborhood, including the canyons located above the site in the Marquez area. The site is situated as an undisputed central flow point for much of the underground and above ground water coming down from the hills above. It is a low point for the area, even prompting the City to design its local area storm drain network to meet and go seaward down from the site. Because of the applicant's site's unique positioning, numerous hydrological issues are present (flooding, erosion, landslides, etc.) and the mitigation devices noted in the MND are inadequate and lacking. Namely, despite the MND noting that hydrological issues raise "less than significant impacts" or "no impact" as indicated by the applicant, it should be understood that hydrological issues are critical issues to be examined due to their ability to threaten the geology, and in turn the development and the safety of its residents and those individual and properties adjacent to it and in the Malibu Village mobile home community below. Moreover, the applicant's own geology reports note that an underground stream goes through the site and considerable groundwater exists below it.

As the proposed building of the site so far down into the soil (as noted in the plans provided) to facilitate the size and depth of the proposed underground parking structure, it is clear such development will necessitate attempts to dam up or otherwise divert natural waterways previously established for hundreds of years. The impact of such damming up or diversion needs to be studied in depth and has not been adequately addressed in the MND or the plans and consultant comments.

Not taking into consideration an El Nino type weather pattern, or even a heavy seasonal rainfall, diverting and otherwise damming or redirecting "substantial" natural underground and above ground water flow, (as is experienced by the underground waterway at 17000 Sunset) can have dramatic and unexpected results. Water as a substance is very difficult to contain and direct, and having a mind (and power) of its own, could pool and flow in unexpected places and directions resulting in land instability, landslides and catastrophic property and resident injury.

Additionally, questions have arisen with respect to the accuracy and completeness of the applicant's hydrological data relied upon in evaluating the MND impacts, namely the report prepared by E.D. Michaels and data provided by Sassan Geosciences. Specifically, based on the evaluation of information provided by consultants GeoConcepts and R. Stone, the E.D. Michael's water flow rate report was based purely on Sassan Geosciences information and did not include other pertinent information readily available under other

past reports on the site and adjoining areas, including reports done by Converse Consultants, Dale Glen & Associates, and Ralph Stone and Company, among others.

Further, it appears from a review of the boring records and the E.D. Michaels report, groundwater levels were only taken during years of below normal rainfall and no account is taken, or even explored, for seasons of higher than normal rainfall, such as an El Nino year. Additionally, high levels of daily infiltration of rainwater, such as over ¾ of an inch during a 24 hour period, was also not evaluated in any detail. This represents a gross underestimation of how much rain the area can have, and has had, with many days over the years marking well over an inch or more of rainfall per day. Further, the E.D. Michaels report solely examined lateral groundwater movement, failing to investigate the impact of vertical water travel. This is a crucial area of examination in that vertical water travel will result in water flow making its way underneath structures.

GeoConcepts also expressed concerns with respect to the E.D. Michaels report, again the report the applicant relied on to evaluate impact/mitigation, as no solution for the disposal of water from the site had been adequately addressed. Other than the hope that the applicant's proposed cistern will catch overflow in development plans, there is virtually no recognition of the impact the altering and diversion of these waterways will have on the surrounding properties and resident safety. This risk cannot be embarked on and assumed by our neighborhood until a genuine evaluation of all risks and ramifications of such hydrologic tampering is evaluated in depth.

An additional concern arises when examining the damming up and diversion of water in conjunction with the reduction of permeable ground area taken up by the proposed development. The applicant's solution to many hydrological issues in applicant's development plan is to alter the water flow and dam up the water underground. With a significant area of land (soil) not capable of water retention once developed, pressure will be added to the adjoining areas of land – Sunset Boulevard, apartment complexes on each side, and Malibu Village mobile home community below – to redistribute and somehow absorb significant runoff (and the proposed redirected groundwater noted above) compounding the potential ravaging effects of this damming and "assumed" redirected water flow. As these adjoining land parcels and the structures built on them, including the Sunset Boulevard, were originally built on partial fill as well, there is a heightened concern to assure natural water convergence does not threaten these structures and surrounding land in an attempt to stabilize the development. Similarly, the unaddressed question of vertical water flow as noted above again comes into play.

As a practical matter, there is no evaluation by E.D. Michaels or the applicant with respect to the ability of the City's storm drain infrastructure to comprehensively accommodate the site's water release, including if, or when, the applicant's water flow redirection method's fail or during heavy downpour/storm conditions. Though the applicant notes that the project will comply with LAMC Section 64.70 regarding storm water runoff, no practical solutions have be provided to demonstrate how this compliance will be met. Moreover, by the applicant's altering and even removing existing natural drainage pathways which the applicant intends to do, significant realities of flooding and erosion could result. These realities must be identified as having a material impact on the

site, the adjacent major highway Sunset Boulevard, and the residents, and mitigating efforts must be enumerated.

4) <u>Traffic Safety & Management – Cumulative Impacts</u>.

The MND as facilitated by the applicant fails to adequately address the traffic impacts on the community. With well over 140+ cars anticipated at this location, there will be significantly increased traffic congestion in the area of Sunset Blvd. & Marquez Ave. This congestion will exacerbate the already dangerous and highly problematic morning and afternoon traffic conditions arising from existing schools (5 in the direct area within walking distance) and facilities in the local area for all nearby Marquez Knolls, Palisades Highlands, and Sunset Blvd residents.

Further, the development is proposing to share a driveway with the adjacent apartment complex; this is only a few hundred feet from the perilous and blind eastbound Sunset curve. As City fire and rescue records show, this stretch of Sunset has an ongoing history of brutal accidents, with major traffic accidents occurring almost monthly, if not more frequently, with the most recent major incident resulting in a fatality directly in front of the site last November. Additionally, the City bus turn-around is also located perpendicular to the proposed development which will create additional traffic related incidents arising from the site development. Mitigating solutions to the clearly identified traffic impacts must be made by the applicant.

Finally, the cumulative impacts of applicant's development and the mitigation efforts must be addressed in light of all other developments in the nearby environs. The significant addition of well over a hundred automobiles to the above mentioned situations will create an extremely hazardous and congested stretch of roadway and in the event of an emergency, could hinder or delay the entry of emergency service into the community. However, traffic issues will be significantly worsened by the building of an apartment/condominium development of similar size as the applicant's less than 300 feet to the west of the site, which is currently in the process of getting development approval. This new development, at 17030 Sunset Boulevard, will add an anticipated 120 plus additional automobiles to be injected on this stretch of roadway. This will very likely exponentially increase the negative impacts associated with the development – crashes, congestion, injuries, etc. Significant due diligence must be conducted with respect to such traffic safety and the community must be assured that their lives are not inadvertently being put into peril due to development haste and the lack of proper (and realistic) traffic studies that clearly address the cumulative impact of other known significant developments a few hundred feet from the proposed development. The MND makes no note of cumulative impacts with respect to traffic or any other areas of applicant's development efforts.

5) <u>Hazards and Hazardous Materials</u>.

The MND fails to address the nature and composition of the material that will be slated for major excavation and the applicant fails to provide clear mitigation efforts with respect to such excavation and the release of hazardous materials unearthed in the process. Further, the community has questions with respect to if there are any findings of

hydrogen sulfide gas on the site, as this highly explosive and corrosive gas was found on the 17030 Sunset development site a few hundred feet away, but not disclosed by the Sassan Geosciences, Inc., the same company that did the boring and soil studies of the 17000 Sunset Blvd. site under review. There also exists an overriding concern that the process of "fill" removal, such fill which has been described as "trash" by the development team, could result in the widespread dispersion of aerosol toxins directly impacting not only the Malibu Village properties below the proposed site, and the adjacent homes and apartments next to it, but the dozens and dozens of children and adult pedestrians who utilize this area of Sunset Blvd., including via the major bus turn around, to walk to school and work. The composition of the fill to be excavated and the effects and impact of its aerosol dispersion, a natural consequence of excavation, have not been studied in detail and should be with clear mitigation efforts noted.

Additional Concerns:

The above five items highlight only the initial threshold concerns of a genuine and responsible evaluation of the impact of the proposed project at 17000 Sunset Blvd on the local environment and community. Additional concerns not adequately addressed in the MND or mitigated thereby include, but are not limited to: 1) Erosion, with the applicant noting that "diversion dykes" will be constructed to facilitate channel runoff where construction takes place during the rainy season, which could prove disastrous to the Malibu Village home community below and possibly even the Pacific Coast Highway; 2) Grading of the site, namely a coastal bluff, with the applicant failing to reference or otherwise take into account Coastal Act (30251, 30253) requirements that grading, cutting or filling that will alter natural land forms (bluffs, cliffs, ravines, etc.) should be prohibited, and in all cases grading should be minimized; 3) Noise, with applicant noting that "no ambient noise is anticipated" despite the construction of an approximately 50 foot high 200 foot long corridor creating wall and building façade, which will necessarily profoundly increase noise levels for the local neighbors across from and adjacent to the site; 4) Biological Resources, with applicant noting mitigation efforts to reduce impacts with respect to tree removal but not addressing the specific assurances with regard to the preservation of state protected Torrey pine trees on the site, including root protection; 5) Transportation/Traffic, additional safety concerns with respect to the blocking of currently existing "tsunami zone" and natural disaster exit pathways, with applicant providing no reference to these items in mitigation other than noting that a driveway and parking plan will be submitted to the City; and, 6) Hydrology/Sewer/Drainage, with applicant not addressing the substantial risk of sewage spills and existing line failures, and resulting local ground and oceanic contamination, due to significantly increased waste production, and no acknowledgement that the site is not connected to any existing drainage and sewer network, and how the addition of 48 living units will potentially overload existing older sewer intake capacity, with no mitigation provisions for such items noted.

Conclusion.

Due to the five threshold items demonstrated as inadequately mitigated in the MND above, namely the severely unmitigated damage to a costal bluff and rare visual resources, the uncontroverted and unmitigated geologic instability of the entire

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development site and Sunset Blvd. ridge area, perilous unmitigated hydrologic aspects of the proposed development site, unmitigated traffic and safety concerns, and genuine questions regarding the safety of hazardous materials on site and following fill debris excavation, the City is urged to exercise extreme diligence in evaluating the safety and impacts of applicant's proposed development and require a Focused EIR for this development.

According to state guidelines, an EIR shall be prepared if there is substantial evidence that the project may have a significant effect on the environment. The determination of whether a project may have a significant effect on the environment calls for careful judgment, based to the fullest extent possible on scientific and factual data. In cases where it is not clear whether there is substantial evidence that a project may have a significant effect on the environment, an EIR shall be prepared when there is serious public controversy concerning the environmental effect of a project (CEQA Guidelines, Section 15064). As demonstrated by this correspondence, and most assuredly others like it which the City will receive, there exists a serious public controversy with respect to applicant's development, not only with within the community, but among multiple credentialed and licensed experts.

It is undisputed that applicant's 17000 Sunset Blvd. project will significantly impact the environment from a geological, hydrological and public welfare and safety standpoint. The unique aspects of acknowledged ongoing seismic activity, the level of which is disputed by multiple experts, the perils of natural underground and above ground water flow findings – also in dispute among multiple experts, the destruction of environmental resources, the dangers of increased traffic and of hazardous materials, and the failure of the applicant provide compelling factual and substantive mitigation to any of these threshold items, make this proposed development a mandatory candidate for a closer and more exhaustive examination under an EIR. In this unique situation a Focused EIR should be required as much to assure preservation of the integrity of the surrounding geology of the area and its environment, as to guarantee the ongoing safety of the community and its residents.

Thank you for your consideration of these very important issues.

Sincerely,

Christian T. Martin

cc: Mr. Daniel Skolnick, Zoning Administrator, City of Los Angeles
Ms. Dana Prevost, Grading Division Chief, City of Los Angeles
Mr. Norman Kulla, Council District 11
Mr. Bill Rosendahl, Councilman District 11
Ms. Whitney Blumenfeld, Sr. Planning Deputy, City of Los Angeles
Mr. Joaquin Macias, Field Deputy, City of Los Angeles
Mr. Mike Bonin, Council Member Elect, City of Los Angeles

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GeoConcepts INC
Geology - Geotechnical Engineering

March 13, 2013

Project 4411

Larry Larson
Pacific Investment Company
6303 Wilshire Boulevard, Suite 201
Los Angeles, California 90048

Subject: **PROJECT REVIEW**
16990 - 17000 Sunset Boulevard
Pacific Palisades, California

References:

1) Geology and Soils Report Correction Letters by the City of Los Angeles, Department of Building and Safety, dated March 11, 2010 and July 21, 2010.

2) Geology and Soils Report Approval Letter by the City of Los Angeles, Department of Building and Safety, dated October 25, 2011.

3) Preliminary Geotechnical Engineering and Engineering Geologic Investigation for 16990-17020 Sunset Boulevard by Sassan Geosciences, Inc. dated November 11, 2009 and Responses dated April 16, 2010 and July 15, 2011.

4) Ground-Water Flow Rate Report by E. D. Michael dated January 2, 2013.

5) Response to Comments Report City of Los Angeles ENV-2012-131-MND prepared by Blodgett/Baylosis Associates, dated December 20, 2012.

Dear Mr. Larry Larson:

Pursuant to your request, presented herein is a summary of our project review for 17000 Sunset Boulevard in the Pacific Palisades area of the City of Los Angeles. It is our understanding that the subject site (17000 Sunset Boulevard), addressed in the referenced geotechnical reports, is inclusive of the properties 16990, 17000, 17010 and 17020 Sunset Boulevard. However, the current scope of the development has been reduced to 16990 and 17000 Sunset Boulevard. The scope of our review included a review of available geology and geotechnical reports provided by Pacific Investment Company. Additional documentation at the City of Los Angeles, Department of Building and Safety (LADBS) was also reviewed and included review letters and geology/geotechnical reports by other consultants.

Sassan Geosciences, Inc. (consultant) performed an investigation on the subject site dated November 16, 2009 to address an (89) unit apartment complex on 16990-17020 Sunset Boulevard. The exploration consisted of (10) borings and (5) trenches excavated on the site to a maximum depth of about (65) feet. Subsurface materials encountered by the consultant during the exploration included fill, soils, terrace deposits, and bedrock. The report was reviewed by LADBS and was not approved in their letter dated March 10, 2010. The consultant produced a response dated April 16, 2010 which included additional clarification on possible landslide planes and analyses as requested by LADBS. LADBS deemed that several responses were not adequate and did not approve the report in their letter dated July 21, 2010. In a second response dated July 15, 2011, the consultant stated that the scope of the development had been reduced to only the vacant lots 16990 and 17000 Sunset Boulevard. The reduced development consists of a 5-story apartment complex with a two-story basement garage. The consultant provided revised analyses and recommendations to address the revised development which were satisfactory to LADBS. The report was approved by LADBS in their letter dated October 25, 2011.

Based on our review of the available geotechnical reports, Ground-Water Flow Report and LADBS review letters for the subject site, the following comments are provided for your consideration. It should be noted that, due to the limited documents available, and the archiving methods utilized by the City of Los Angeles, not all of the geotechnical reports and/or review letters may have been available for review and/or were reviewed.

1. The consultant makes reference to reports by previous consultants that have performed investigations in areas that were previously included in the proposed development, which included Fisher Geotechnical, Leighton & Associates, Gorian & Associates, Moran/Proctor and Dames & Moore. It appears that the site (16990 Sunset Boulevard) was also investigated by Converse Consultants (CC), dated August 1, 1986 and Dale Glenn & Associates (DGA) and Ralph Stone and Company, Inc. (RSC) both dated October 9, 1989. These findings and data from these reports should be addressed in the current reports to provide assessment of the site conditions and suitability for development.

2. The subsurface exploration by Converse Consultants and previous consultants referenced therein should be included on the consultant's geologic map and cross-sections.

3. Boring BH-11 by CC near the toe of the south-facing slope encountered a (6) inch layer of clay gouge. LADBS had previously reviewed the CC, DGA & RSC reports and interpreted the clay gouge to be a possible slide plane. The consultant must discuss whether or not the clay gouge is a possible slide plane, which may affect the proposed development located at the top of the slope.

4. RSC performed a back-calculation of a landslide plane in their investigation of the subject site. The consultant should discuss whether they concur with the resulting shear strength values and revise their analyses accordingly.

5. In regard to the slope stability analyses (report by Sassan Geoscience, Inc. dated: July 15, 2011), the equivalent horizontal acceleration (Kh = 0.15) used in the analyses does not meet the recommended procedure in the Guidelines for Evaluating and Mitigating Seismic Hazards in California, SP 117A (2008).

6. The cohesion intercept used in the slope stability analyses for the Bedrock3 is high for such bedrock as described in the explorations (report by Sassan Geoscience, Inc. dated: July 15, 2011). If lower values are used in the analyses, it may result in a deeper critical failure surface and increase the lateral force on the proposed piles and the lateral load application point.

7. The undocumented fill shear strength (C = 380 pounds per square foot, and Phi = 34 degrees) used to calculate the lateral equivalent fluid pressure may be inappropriate as caving within the fill was noted that would indicate lower strengths. Therefore, the wall design may not be adequate for the proposed structure.

8. The recommended pseudo-static lateral earth pressure is low for the documented retained material.

9. Groundwater affects were not fully discussed. The affects include, but not limited to, lateral hydrostatic pressure, the use of effective unit weight in the passive pressure analysis, the use of effective unit weight in the bearing capacity analysis for conventional foundations and pile capacity. Reference is made to retaining a hydrogeologist to provide dewatering recommendations for the site. A report by a hydrogeologist was not available. Until it is demonstrated that the site can be permanently dewatered the stability of the site and the design pressures for the retaining structures may not be adequate.

10. The Ground-Water Rate Report concludes that the primary source of water is from within the fill materials. Additionally it is concluded that the water can be collected near the northern of property. The evaluation does not consider the proposed infiltration of ¾ inch of rainfall during a 24 hour period, therefore, the concluded quantities may not be accurate (see 2.6 & 2.7 below). In addition, disposal of this collected water has not been addressed.

11. The proposed piles are proposed to be incorporated into the proposed structure. What is maximum shear and bending values of the proposed piles? The deflection of the proposed piles will adversely affect the structure.

The following comments are provided per Responses within Reference No. 5 above.

Response 2.1:

The limits of the 'trash' fill has not been adequately defined to ensure that it will be removed during the proposed construction. In addition, the 'organic' and 'pertoliferous' odors reported have not been adequately investigated to provide proper mitigation. The assumption that the vapors are from bituminous shale section could indicate a significant amount of natural occurring vapor could be encountered. No mitigation of these vapors has been proposed.

Response 2.6:

The response indicates that the current plan is to dewater the filled channel. The response also indicates that it is proposed to infiltrate ¾ inch of rainfall during a 24 hour period. How can the site be dewatered at the same time that it is have water infiltrated into the ground?

Response 2.7:

The proposed slopes are proposed to planted and irrigated. Typically irrigation will greatly exceed the amount of natural rainfall. Thus, additional rainfall infiltration will occur that can affect the stability of the site.

Response 2.8:

It is stated that the risk of landsliding will be reduced by dewatering, yet infiltration of stormwater runoff is proposed. See 2.6 above.

Response 2.10:

A study has been completed that presents plans to completely dewater this channel. This report should be provided for review and has this been approved by the City and how does it incorporate infiltrated water (see Response 2.6).

Response 2.13:

Infiltration proposed in Response 2.6 will increase the groundwater which could increase the potential for landslide movement.

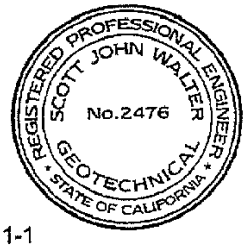
Response 11.2:

A nearly completed study of the ground-water occurrence in the filled channel will recommend dewatering. Response 2.10 says a study has been completed. Is a study completed or not?

The preceding items need to be addressed to determine the stability of the site and the feasibility of site being developed safely. Additional items may arise as additional information becomes available.

Should you have any questions regarding this review, please do not hesitate to contact the undersigned at your convenience.

Respectfully submitted,
GeoConcepts, Inc.



Scott J. Walter
Project Engineer
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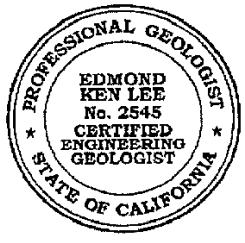

Edmond Lee
Project Geologist
CEG 2545

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RALPH STONE AND COMPANY, INC.
Geotechnical, Environmental & Civil Engineers

April 18, 2013
File: 7062

Malibu Village HOA
17015 Pacific Coast Highway
Pacific Palisades, Ca 90272
Attn: Herb Englehardt, President

SUBJECT: Project Document Review for Multi-Level Structure at 16990-17000 Sunset Boulevard, Pacific Palisades, California

REFERENCES: See Appendix A

Dear Mr. Englehardt:

In accordance with your authorization, we have completed this review of project documents by Sassan Geosciences, Inc. (consultant) pertaining to the development of a proposed multi-level structure at 16990-17000 Sunset Boulevard. We have reviewed past documents prepared circa 1989 for a similar project at the subject site and documents provided to us regarding the current project, as listed in Appendix A.

The site consists of a vacant pad located at the top of a descending slope comprised of canyon fill and bedrock. It is our understanding, from the documents provided, that it is proposed to construct a multi-level structure with two-levels of subterranean parking on the pad. It is intended to support the structure on piles founded in competent bedrock and additional soldier piles are proposed at/near the property line to provide an appropriate factor of safety. Specific drainage recommendations were provided to address the relatively shallow groundwater table.

The site is located immediately upslope and north of the Malibu Village mobile home park which is located at 17015 Pacific Coast Highway. The properties share a common property boundary and the slope between the two properties is owned in part by both parties, though most of the slope is located within the Malibu Village property.

Based on our review of the Reference documents cited herein, we provide the following comments regarding the proposed project:

1. The consultant's recent geologic map for the current project, and topographic map upon which it was based, do not include the easternmost corner of the property. Improvements may or may not be planned for this area, but it appears that storm drain connections may extend easterly beyond the area shown and additional slope stabilization may be required. The project maps should extend east to include the entire property. The consultant should consider providing additional cross-sections and slope stability analyses of the very steep slopes located near the easternmost property corner.

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2. Significant exploration was performed at the subject site and on the subjacent descending slope by Converse Consultants Pasadena (CCP) for their Reference 1 report for a similar multi-level project. The consultants should review and incorporate CCP exploration and earth material/groundwater data on the maps/sections for the current project.

3. Based on the Reference 1 boring logs by CCP, a hydrogen sulfide odor was observed in Borings B-2 and B-7 near the top of slope and a chemical odor was observed in Boring B-6 on the pad. The consultant should provide recommendations for mitigation of the odors, as necessary, and discuss the impact of odor-producing materials at depth on the proposed project.

4. The consultant should test the existing earth materials and groundwater for corrosivity against proposed buried metal/concrete structures. Depending upon results, concrete/foundation/utility specifications may need to be revised.

5. The Reference 7 report by the consultant states:

> "Although landslides have occurred on the coastal bluff to the east and west of the subject property, only surficial landslides have been mapped on the slope area below the site."

This statement is misleading considering the slope below the site is the head escarpment of a very large bedrock landslide. Subsequent to sliding, the escarpment was breached by a canyon which is currently filled and the landslide debris was modified by grading/fill. The landslide debris and slip surface were never removed, nor was the slide mass stabilized. The slide mass is currently occupied by the Malibu Village mobile home park. The consultant should comment on the implications of past signficant earth movement with respect to earth material strengths, slope stability analyses, and foundation/wall design.

6. CCP encountered a clay seam/gouge at depths of 15 to 20 feet in Boring B-11 near the toe of slope and Evans, Colbaugh & Assoc., Inc., (ECA) encountered clay seams at depths of 46 to 52 feet in Boring B-1 near Pacific Coast Highway which may indicate the existence of a landslide plane or other adversely-oriented planar geologic feature. The consultant should comment on the implications of the clay seams/clay gouge and provide revised analyses and/or recommendations as applicable.

7. Based on the Reference 5 City Review Letter, it is recommended that the consultant utilize minimum allowable strengths for earth materials or back-calculated values in their analyses due to the highly distorted nature of the underlying earth materials.

8. The strengths used by CCP in their analyses are lower than the strengths used for analyses/design of the current project. It should be noted that neither the City nor E.D. Michael in an independent review (Ref. 2) approved of strengths used by CCP in their report. The consultant should provide justification for use of higher shear strengths considering the CCP data and subsequent City/independent review.

9. The consultant applied fill/colluvium strengths obtained from top-of-slope pad to off-site landslide debris at the toe of slope. The consultant also states in their Reference 8 report:

> "... this slide would not affect the stability of the slopes below the subject property."

This statement may imply that the existing off-site landslide debris acts as a buttress against potential deep-seated slope failures. The strengths used by the consultant are significantly higher than strengths presented by ECA in their Reference 6 report for the mobile home park at the toe of slope. The consultant should, as a minimum, review the ECA data and incorporate ECA exploration depths/data on the maps/sections for the current project and provide quantitative justification for the Reference 8 statement quoted above.

9. Fill/colluvium strengths used by the consultant are higher than CCP fill strengths and higher than expected for a lower density soil described as "loose" and "caving" in the consultant's boring logs. The consultant should provide justification for use of higher shear strengths considering the qualitative descriptions in their logs and City-reviewed CCP strengths.

10. The slope stability analyses and design calculations for wall/piles are based on earth material strengths in question. The analyses and design may need to be modified/revised, as necessary.

11. Seismic slope stability analyses by the consultant use a horizontal seismic coefficient of 0.15 which is not in accordance with LADBS guidelines.

12. Considering the existing landslide debris and clay seams/gouge at/near the toe of slope, the consultant should extend slope stability search limits to PCH to rule out potential failures through landslide debris.

13. ECA provided a section through the thalweg of the pre-existing canyon whereas the consultant's cross section E-E' is drawn perpendicular to slope contours and may not be an accurate representation of the depth of the canyon fill. The consultant should review the ECA data and accurately depict the depth of the canyon as relates to proposed foundation piles and proposed removal/recompaction of the canyon fill.

14. The consultant's borings B-8 east of the filled canyon and B-2 west of the filled canyon encountered the basal contact between the terrace deposits and bedrock at approximately 8 and 22 feet below grade, respectively. The consultant should discuss the significance of the 14-foot contact offset.

15. Considering the configuration of the canyon as shown on the regional geologic map by McGill, the clay seam/gouge found in borings by CCP, and shear zones found in a trench by CCP, could the filled canyon be masking a graben or head scarp of a large south- or southwest-directed landslide? Might a fault be present at the subject site as described by E.D. Michaels (Ref. 2) and shown on the McGill map? The consultant should discuss the impact of these geologic features, if present, on the proposed project.

16. Proposed perimeter subdrain trenches will provide a conduit by which water can infiltrate into the existing fill and down gradient into the off-site slope, and may artificially raise the groundwater level near the top of slope. The consultant should address the infiltration issue and/or revise analyses and recommendations considering the worst-case groundwater condition at the level of the proposed subdrain trenches.

17. To intercept subsurface water in the canyon fill, a proposed three-tiered retaining wall subdrain system is recommended to be connected serially to the lowest tier. In the event of blockage of the lowest tier subdrain pipes or outlets, subsurface water levels may rise to the upper tiers. The consultant should consider independent/parallel installation of each tier of subdrains/outlets.

Thank you for this opportunity to be of service. If you have any questions, please contact the undersigned at the letterhead location.

Very truly yours,

RALPH STONE AND COMPANY, INC.

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Enclosures: Appendix A - References
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APPENDIX A
REFERENCES

1. Geotechnical and Geological Investigation (and Supplemental Slope Stability and Foundation Design Data), Proposed Apartment Building, 16990 Sunset Boulevard, Los Angeles, California; by Converse Consultants Pasadena, CCP Project No. 86-31-238-01, August 1, 1986 (November 26, 1986)

2. Review of Geotechnical and Geological Investigation, Proposed Apartment Building, 16990 Sunset Boulevard, Los Angeles, California by Converse Consultants, Aug. 1, 1986 (CCP Project No. 86-31-238-01); City of Los Angeles Office of Zoning Administration, Coastal Development Permit Case No. CDP86-020; by E.D. Michael, September 29, 1986

3. Geologic Investigation for Proposed 3- to 4- Story Apartment Complex with 2- to 3-Story Subterranean Parking Levels, Portions of Lots 2 and 3, Tract 10238, 16990 Sunset Boulevard, City of Los Angeles, California; by Dale Glenn & Associates, work Order #8507-142, October 9, 1989

4. Update Geotechnical and Geologic Engineering Report for Proposed Multi-Unit Building at 16990 Sunset Boulevard, Pacific Palisades, California; by Ralph Stone and Company, Inc., File 2605, October 9, 1989

5. City Review Letter (of Ref. 3,4 above), Log # 14215; by LADBS, January 4, 1990

6. Report of Geotechnical Evaluation - Repair of Ground Distress, Malibu Village; by Evans, Colbaugh & Assoc., Inc., ECA 94-21-02, November 12, 1997

7. Preliminary Geotechnical Engineering and Engineering Geology Investigation for 17000-17020 Sunset Boulevard, Pacific Palisades; by Sassan Geosciences, Inc., SAS File # 8JSM122, November 16, 2009

8. Addendum No. 1 to Preliminary Geotechnical Engineering and Engineering Geology Investigation, 16990-17020 Sunset Boulevard, Pacific Palisades; by Sassan Geosciences, Inc., SAS File # 8JSM122, April 16, 2010

9. Addendum No. 2 to Preliminary Geotechnical Engineering and Engineering Geology Investigation, 16990-17000 Sunset Boulevard, Pacific Palisades; by Sassan Geosciences, Inc., SAS File # 1GAB052, July 15, 2011

10. Geology and Soils Report Approval Letter; by LADBS, Log # 69754-02, October 25, 2011

11. Ground-Water Flow Rate, Sunset Palisades Development 16990 Sunset Boulevard, Pacific Palisades Area, City of Los Angeles, California; by E.D. Michael, January 2, 2013