

## GENERAL INFORMATION ABOUT THE CONTENTS OF THIS FILE

Submissions by the public in compliance with the Commission Rules and Operating Procedures (ROPs), Rule 4.3, are distributed to the Commission and uploaded online. Please note that “compliance” means that the submission complies with deadline, delivery method (hard copy and/or electronic) AND the number of copies. Please review the Commission ROPs to ensure that you meet the submission requirements. The ROPs can be accessed at <http://planning.lacity.org>, by selecting “Commissions & Hearings” and selecting the specific Commission.

All compliant submissions may be accessed as follows:

- **“Initial Submissions”**: Compliant submissions received no later than by end of day Monday of the week prior to the meeting, which are not integrated by reference or exhibit in the Staff Report, will be appended at the end of the Staff Report. The Staff Report is linked to the case number on the specific meeting agenda.
- **“Secondary Submissions”**: Compliant submissions received after the Initial Submission deadline up to 48-hours prior to the Commission meeting are contained in this file and bookmarked by the case number.
- **“Day of Hearing Submissions”**: Compliant submissions after the Secondary Submission deadline up to and including the day of the Commission meeting will be uploaded to this file within two business days after the Commission meeting.

Material which does not comply with the submission rules is not distributed to the Commission.

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# SECONDARY SUBMISSIONS

The following submissions by the public are in compliance with the Commission Rules and Operating Procedures (ROPs), Rule 4.3b. Please note that “compliance” means that the submission complies with deadline, delivery method (hard copy and/or electronic) AND the number of copies. The Commission’s ROPs can be accessed at <http://planning.lacity.org>, by selecting “Commissions & Hearings” and selecting the specific Commission.

All materials in response to a Recommendation Report or additional comments which were received by the Commission Executive Assistant electronically no later than 48 hours prior to the Commission meeting AND which do not exceed ten (10) pages including exhibits are included in this file.

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# DAY OF HEARING SUBMISSIONS

The following submissions by the public are in compliance with the Commission Rules and Operating Procedures (ROPs), Rule 4.3c. Please note that “compliance” means that the submission complies with deadline, delivery method (hard copy and/or electronic) AND the number of copies. The Commission’s ROPs can be accessed at <http://planning.lacity.org>, by selecting “Commissions & Hearings” and selecting the specific Commission.

All submissions distributed to the Commission during the Commission Meeting are included in this file.

Material which does not comply with the submission rules is not distributed to the Commission.

## ENABLE BOOKMARKS ONLINE:

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**NOV 13 2019**

**CITY PLANNING DEPT.  
AREA PLANNING COMMISSION**

## **STANDARD OF REVIEW FOR ADMINISTRATIVE APPEAL**

**MULTIPLE APPROVALS APPEAL REVIEW PURUSANT TO LAMC  
SECTION 12.24:**

**“WHEN CONSIDERING AN APPEAL FROM THE DECISION OF AN  
INITIAL DECISION-MAKER, THE APPELLATE BODY SHALL MAKE ITS  
DECISION, BASED ON THE RECORD, AS TO WHETHER THE INITIAL  
DECISION-MAKER ERRED OR ABUSED HIS OR HER DISCRETION.”**

**TO SUSTAIN THIS APPEAL, THIS APC MUST FIND THE ZA ERRED OR  
ABUSED HIS OR HER DISCRETION IN APPROVING THE PROJECT.**

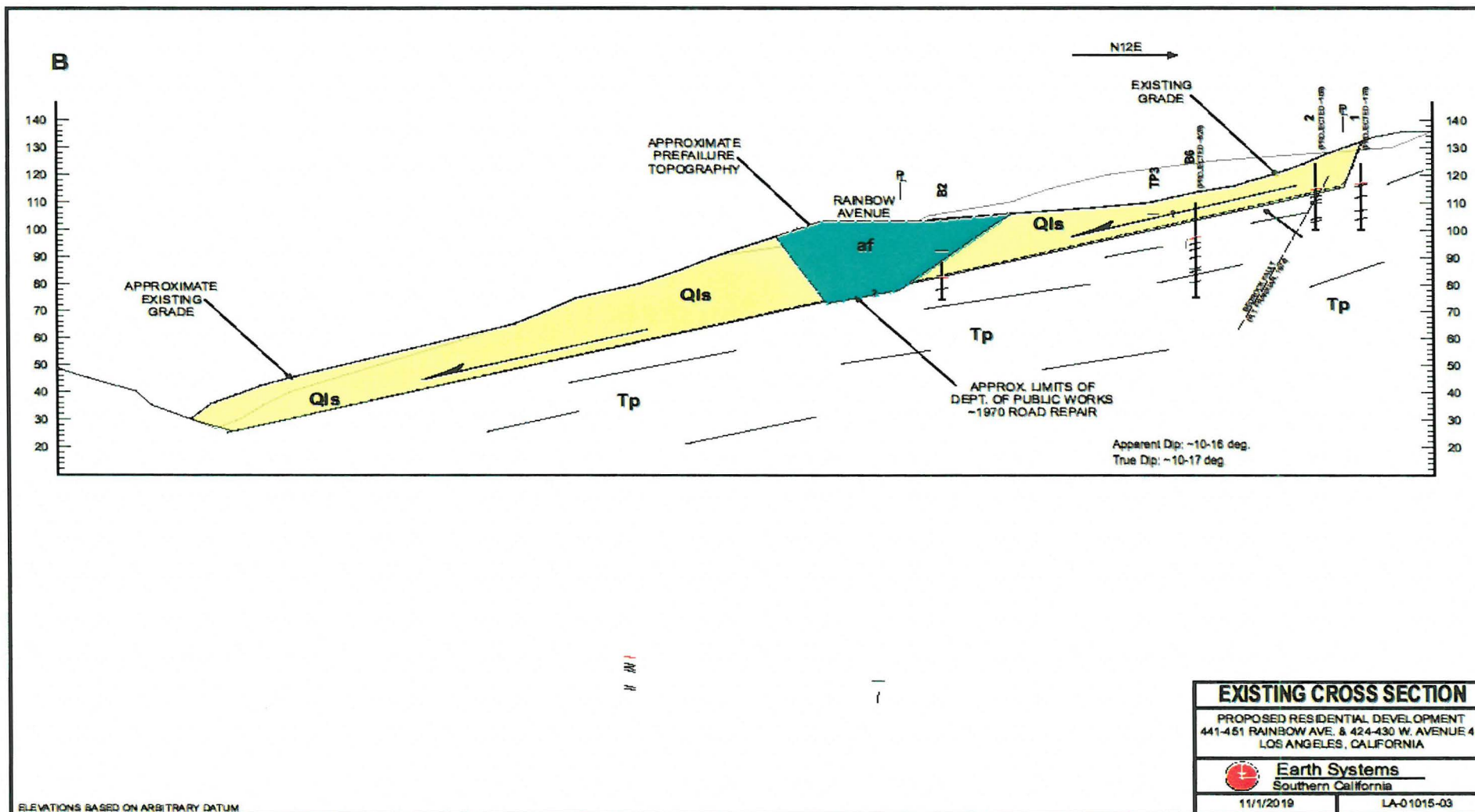
## **LEGAL STANDARD REQUIRED BY CEQA**

**A FAIR ARGUMENT SUPPORTED BY SUBSTANTIAL EVIDENCE THAT THE PROJECT MAY HAVE AN UNMITIGATED SIGNIFICANT EFFECT ON THE ENVIRONMENT.**

**CEQA GUIDELINES SECTION 15384(b) SUBSTANTIAL EVIDENCE IS “FACTS, REASONABLE ASSUMPTIONS PREDICATED UPON FACTS, AND EXPERT OPINION SUPPORTED BY FACTS.”**

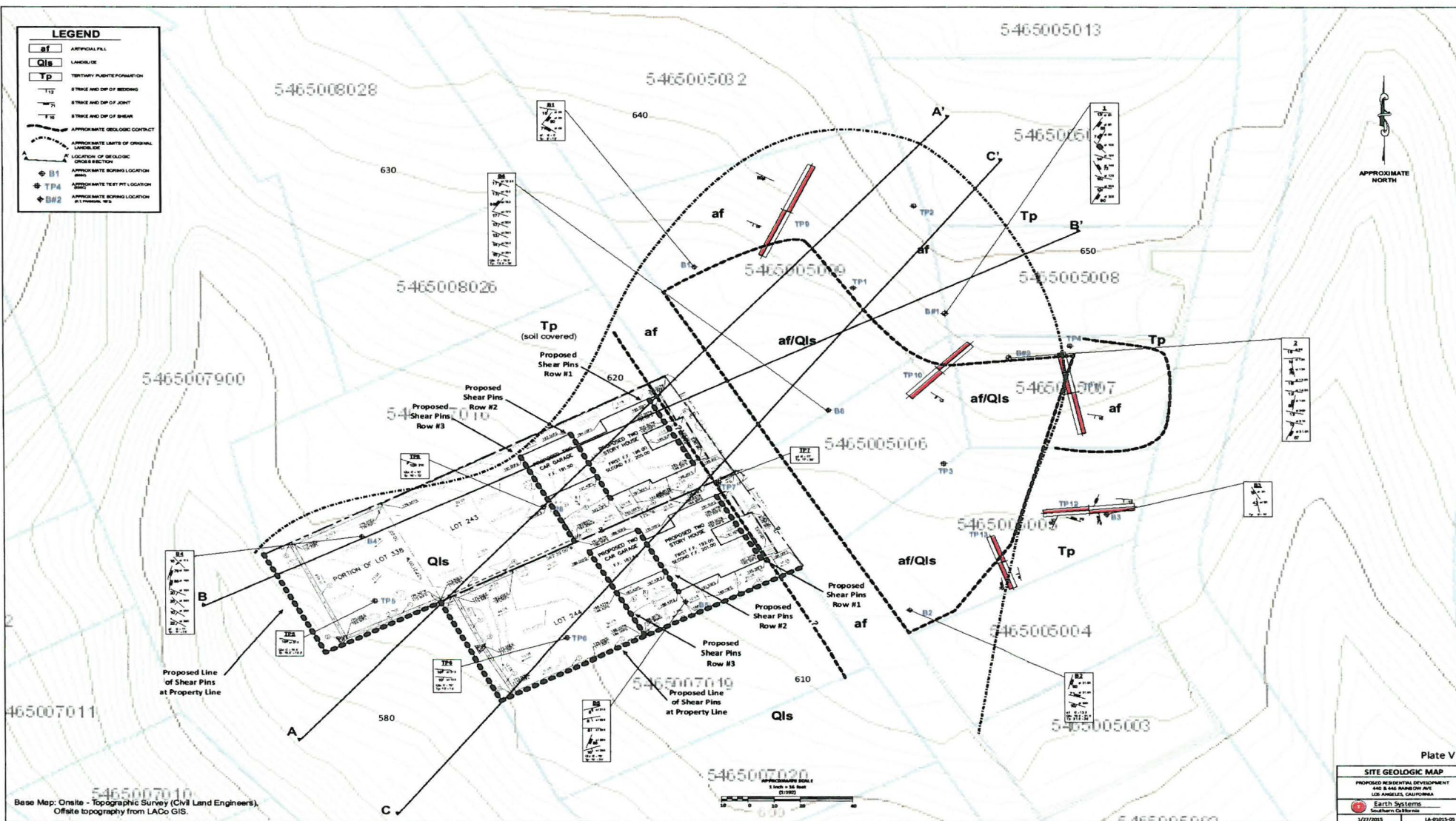
**CEQA GUIDELINES SECTION 15384(a) SUBSTANTIAL EVIDENCE IS NOT “ARGUMENT, SPECULATION, UNSUBSTANTIATED OPINION OR NARRATIVE, EVIDENCE WHICH IS CLEARLY ERRONEOUS OR INACCURTE, OR EVIDENCE OF SOCIAL OR ECONOMIC IMPACTS WHICH DO NOT CONTRIBUTE TO OR ARE NOT CAUSED BY PHYSICAL IMPACTS ON THE ENVIRONMENT.”**





**LEGEND**

- af ARTIFICIAL FILL
- Qls LANDSLIDE
- TP TERTIARY PLUNGE FORMATION
- T12 STRIKE AND DIP OF BEDDING
- T1 STRIKE AND DIP OF JOINT
- T12 STRIKE AND DIP OF SHEAR
- APPROXIMATE GEOLOGIC CONTACT
- APPROXIMATE LIMITS OF ORIGINAL LANDSLIDE
- LOCATION OF GEOLOGIC CROSS SECTION
- APPROXIMATE BORING LOCATION
- B1 APPROXIMATE TEST PIT LOCATION
- TP4 APPROXIMATE BORING LOCATION AT 1 PERCENT SFS
- BH2 APPROXIMATE BORING LOCATION AT 1 PERCENT SFS



Base Map: Onsite - Topographic Survey (Civil Land Engineers),  
 Offset topography from LACo GIS.

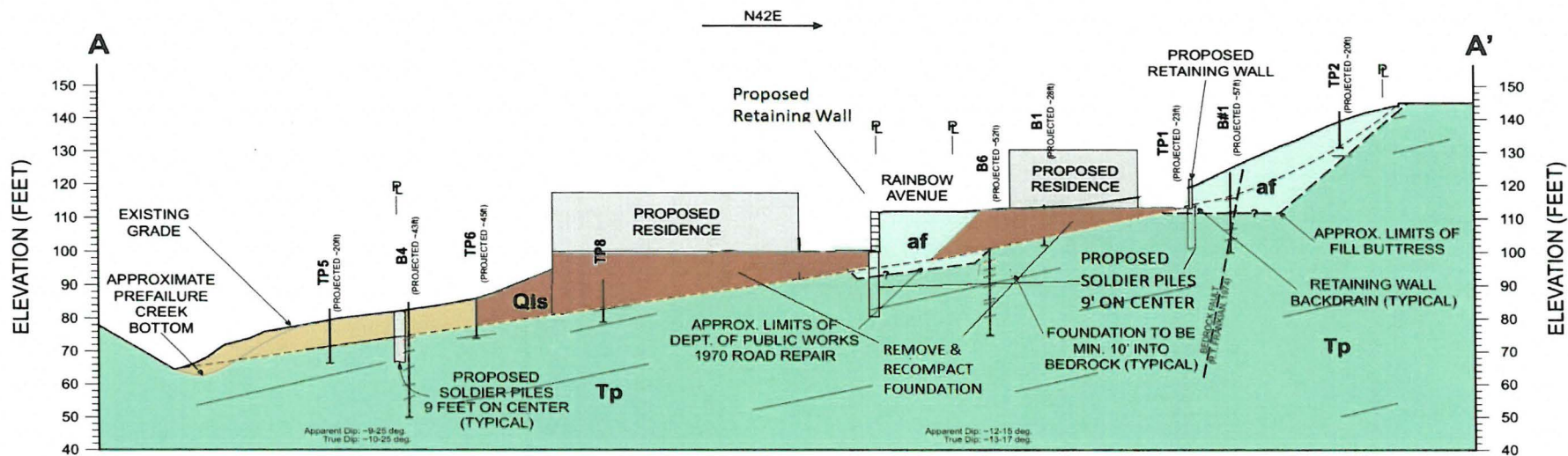
Plate V

**SITE GEOLOGIC MAP**

PROPOSED RESIDENTIAL DEVELOPMENT  
 440 S. 44th STREET, LOS ANGELES, CALIFORNIA

Earth Systems  
 Southern California

1/17/2015 LA-03015-05



ELEVATIONS BASED ON ARBITRARY DATUM

SCALE  
1in = 30ft (H&V)

PLATE VI

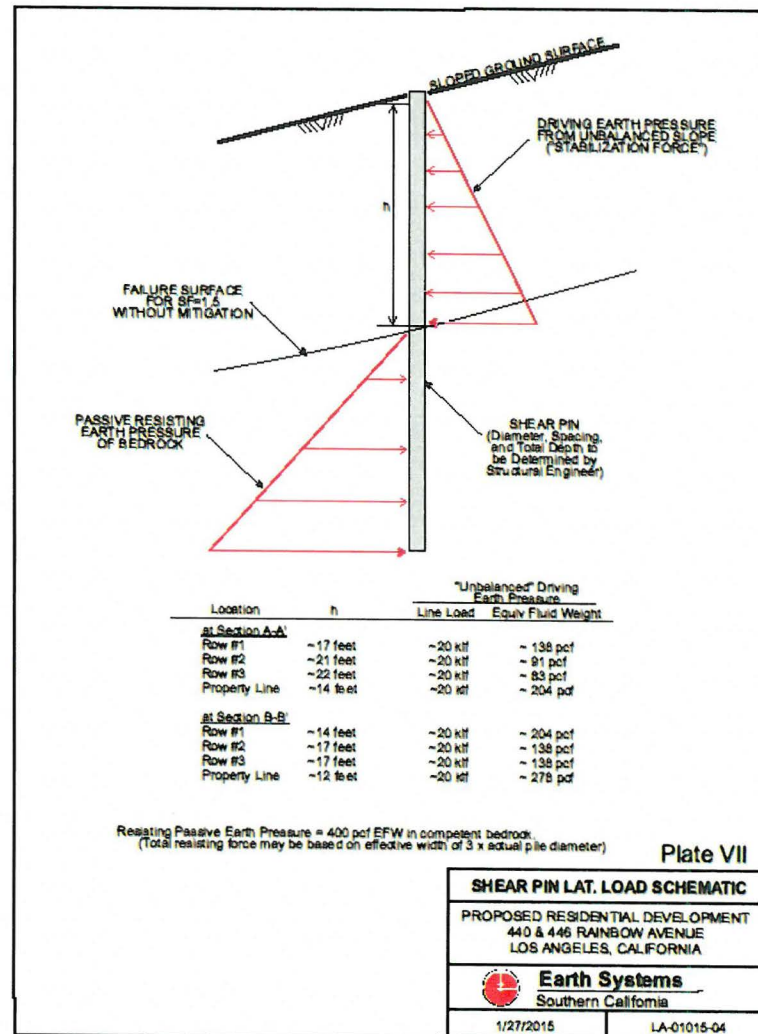
**GEOLOGIC CROSS SECTION A-A'**

PROPOSED RESIDENTIAL DEVELOPMENT  
440 - 451 RAINBOW AVE. & 424 W. AVENUE 45  
LOS ANGELES, CALIFORNIA



**Earth Systems**  
Southern California

LA-01015-01



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ITEM 5

## MOUNT WASHINGTON HOMEOWNERS ALLIANCE

## RAINBOW CANYON LANDSLIDE PROJECT SUMMARY COMMENTS AND PROPOSED MOTION

CITY PLANNING DEPT.  
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For the convenience of Commissioners, here are the key points established in the record by both the Applicant's submittals and materials submitted by the Community:

1. **Lack Of Actual Notice** – Within 5 days of filing an application for a Specific Plan Permit approval, the applicant is required to post a Notice of Intent sign. This notice allows interested persons to request mailed notice of all hearings, environmental documents, and decisions. This was not done. Even though the City had a radius map and set of mailing labels in the Project file, inconsistent with minimum due process, it failed to mail notice of the circulation of the MND for public review and comment. Persons with constitutional rights were deprived by omissions.
2. **Failure to Circulate The MND To Recreation And Parks Department And Santa Monica Mountains Conservancy, Along With All Supporting Studies.** CEQA Guidelines imposes a mandatory duty to circulate the MND to state agencies managing resources potentially affected by the Project, and to include all supporting studies to enable state agency review and comment. That did not happen and Santa Monica Mountains Conservancy has submitted its own letter observing that grading of the 1968-69 slide mass on the Project site may affect the slide mass and toe which lies at the bottom of Rainbow Canyon Park – a state managed facility. Also, given the recreation programs conducted by the Carlin G. Smith Recreation Center, including basketball courts and hiking trails across the street from the Project site, the potential PM 2.5 air impacts on children's recreation nearby has not been disclosed or studied. We need to protect the children of the community with a proper review.
3. **Seriously Deficient Project Description.** The presence of the massive 1968-69 landslide and, by Applicant's own plan sheets, over 17,000 cubic yards of cut, move, sifting, and re-compaction with heavy pounding was NOT mentioned at all in the MND. The Project description was not accurate and failed to disclosed all that the City knew. Failure to describe the landslide and massive amount of remedial grading required, means air emissions, noise impacts, diesel, would likely be significant. The deficient description cascades lack of disclosure throughout the MND.
4. **Failure to Post The Grading Reports To Support The MND Conclusions.** The City's website shows that the MND posted and made available at City Hall only had the MND and a tree report. However, three vital issues involving grading and geology relied upon the Grading Report and City approval letter. The failure to post ALL studies violated CEQA Guidelines and demonstrates an intent by the Applicant or City staff to suppress from the public the landslide and grading.
5. **"No Impact" Conclusion on Wildfire Risk Based On Factually Untrue Information.** The City claimed that the area is "highly urbanized" and therefore there is no wildfire risk. The MND failed to disclose the presence of two parks, one with native trees and brush. The MND also failed to address the severe fire access challenges to Rainbow Avenue which, of course, was one of the reasons the subject lots were down planned and down zoned to RE-40 in 1979 and 1990.
6. **The ZA Failed To And This Commission Is Unable To Make A Finding The Project Is Consistent With The General Plan And Zoning.** State law under the *Orange Citizens* case, the Northeast Community Plan, and Ordinance No. 159748 (Note: MWWHA's November 10, 2019 letter erroneously referred to 159740 instead of the correct number), all impose a requirement that

each project considered by the City (1) must be consistent with the General Plan Land Use Designation, and (2) must be found, based upon substantial evidence in the record, to in fact be consistent with Land Use Designation. The ZA failed to do so and instead, tried to cite LAMC 12.23 which purports to allow one house per lot. But this ancient zoning code provision was overruled by the City's 1979 downplanning to Minimum Residential, and the 1990 rezoning to RE-40. Also, the 1979 and 1990 actions were supported by an EIR and findings that the downplanning and rezoning was necessary under CEQA to reduce or avoid significant impacts from overdense development in sensitive, high fire hazard severity zones of hillside areas. Thus, 12.23 zoning code cannot trump the supreme Land Use Designation, and failure to disclose this land use conflict and analyze it in the MND also violated CEQA.

7. **At Least Two Houses Under The Specific Plan Violate the FAR Limits and Under The More Restrictive Baseline Hillside Ordinance, Three Houses Violate FAR Limits.** The plans submitted by the developer and attached to the ZA approvals, based upon simple addition are over the limit of the Specific Plan because the architect for 441 Rainbow failed to add in the garage/carport and covered porches. The same may be true as to the porches for 437 Rainbow. Mark Kenyon performed more analysis under the baseline hillside ordinance and shows in his testimony three of the houses violate the more restrictive FAR. Section 2 of the Specific Plan states that the LAMC applies for FAR unless the Specific Plan is more restrictive. The City failed to apply the most restrictive FAR calculation and therefore findings of compliance with the Specific Plan cannot be made on this record.
8. **Baseline Hillside Ordinance Restricts Grading By Right On Limited Hillside Streets Yet The Applicant Proposes Massive Amounts Of Grading Without Demonstrating The Project Meets The Exceptions Under the Ordinance.**

The baseline hillside ordinance does not allow this amount of grading unless (1) exceptions are shown to apply to bring the amount of grading below authorized amounts, or (2) the developer applies for a discretionary increase in grading up to a certain amount. File shows no analysis.

#### **MOTION FOR COMMISSION**

I move to grant the appeal of the MWAH in its entirety, and direct the City Planning Department to return the case for processing consistent with these findings:

- The June 24, 2006 findings of the East Los Angeles Planning Commission are equally valid to this new version of a project.
- The Project is inconsistent with the general plan Land Use Designation and RE-40 zoning.
- The developer failed to post Notice of Intent signs on the properties within 5 days of applying for a Specific Plan Permit
- Circulation of the MND should have been made to both park operators in accordance with CEQA and it was not.
- The MND posted online should have included all supporting studies and it did not
- The Project Description failed to disclose significant information required to be included in the MND first circulated, and the errata cannot be used to add significant information
- One or more of the houses appear to violation FAR limits of the baseline hillside ordinance and the Specific Plan

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RE: CASE# AA-2016-3954-PMLA-1A

AGENDA ITEM #7 (PROJECT SITE: 780, 781, 790, 791 North Cynthia Avenue)

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In contradiction to the ruling by the planning department that "no negative impacts" would occur in Red Hawk Canyon, this proposed development will most certainly negatively impact the environment and wildlife of this canyon, which has a unique topography and is a part and parcel of the character of the Mt. Washington area and Arroyo Seco basin, of which this canyon is linked. Despite what the department said that their expert did not notice any wildlife, I have been living here since 2002, and have seen packs of coyotes sleeping on the hillside, 2 young coyotes birthed there, skunks, possums and racoons passing through and birds nesting in the trees. One would have to observe more than once, and not during the daylight hours, to see what really goes on in RedHawk Canyon.

This proposed site is being placed in an area that has never been developed before and there's a reason for it: it is at the bottom of a basin, that accumulates storm water runoff, that runs through the middle of it, pooling and flooding Cynthia below. In addition, the fire dept has deemed this property a high hazard fire zone. Without proper infrastructure, this building project is a public safety hazard, which has not been effectively mitigated by the planning dept. We are concerned that the ruling to go ahead with the project did not consider the cumulated impacts of this project, or effective or enforceable mitigations. For instance, Easements were taken into consideration for the width of San Andreas Ave., when in actuality, houses on San Andreas were zoned and approved and built into those easements. There is no way to widen a street here. Fire trucks can barely get through. With more traffic on this street there will be more problems not only for the fire trucks but for those living adjacent to the road.

Another example of ineffective mitigation or wishful thinking, a bird biologist would come each week to check on nesting birds during construction is strictly a false hood. It would never be enforced by the city and we assume the developer knew this.

And one more case of wishful thinking: the developer claims the building site will occupy only 40% of Red Hawk canyon. This fact has not been proven with a correct rendering of the project, if you include the private road, plus the driveways plus the concrete pads upon which these houses will sit. We would like to see a current rendering in 3-D to disclose if this is true or not. We do not believe it is true because we have seen a correct rendering and the buildings appear to take over most of the basin.

Noise is also a problem not addressed. This canyon serves as an echo chamber and acts like an amphitheatre, whereas families on one side of the canyon can easily hear people on the other. With 4 houses and a roadway at the bottom of the basin, the noise will reach unacceptable levels. This problem has not been addressed or analyzed.

In conclusion, the proposed 4 single family houses for upper income households are being planned on unique topography, in a high fire hazard zone, with flooding and stormwater runoff issues, irregular winding narrow streets with limited and inadequate emergency access. No developer has been able to develop here before because the same planning dept deemed mitigation measures inadequate. We believe that this project is a potential public safety hazard and has not had the proper disclosure, analysis or mitigation of the cumulative impacts of the surrounding hillsides. We hope the Commissioners will take into consideration our reasonable and researched objections.

**Charlotte Hildebrand  
4267 San Rafael Ave.  
Los Angeles, CA 90042**

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City Planning Department, City of Los Angeles | 200 Spring Street | Los Angeles, CA 90012

EAST LOS ANGELES AREA PLANNING COMMISSION MEETING 11/13/2019

WRITTEN SUBMISSION by JAROSŁAW BIEDA

CASE# AA-2016-3954-PMLA-1A

Agenda Item #7 (PROJECT SITE: 780, 781, 790, 791 North Cynthia Ave.)

CITY PLANNING DEPT.  
AREA PLANNING COMMISSION

### **INTRODUCTION**

I reside at 4261 San Rafael Ave. LA 90042, a property directly adjacent to the proposed development. I definitely acknowledge the lawful right of the owner to develop his property but it should not be at the cost of the safety and wellbeing of the surrounding property owners. This property is located in a very high hazard fire zone and is already experiencing severe storm water drainage problems and landslides. I believe the owner/developer should address all the valid concerns that the neighboring property owners have.

I want to clarify and emphasize that my opposition to the proposed subdivision plans for Red Hawk Canyon is not a typical NIMBY case. The development in consideration is not a low-or even moderate-income multifamily housing project. These are market-rate single family houses for upper-income households, designed, built and later sold by a developer solely to make a profit. I would like to express that I am well aware of the housing crisis and homelessness problem in LA and I know that everybody at the State level and the City is determined to facilitate new housing developments to remedy this problem.

However, this is not an affordable housing project in an urban area, close to transit, which could actually help alleviate the housing crisis in our city and would have a social justice component. This lot subdivision is a threat to public safety and would definitely negatively impact the natural environment. The proposed four single family houses for upper income households are on a greenfield undeveloped site with a unique topography, vegetation and wildlife in a very high fire hazard zone with flooding and storm water runoff issues, irregular winding narrow streets with limited and inadequate emergency access. That is why I am appealing the city's decision to conditionally approve the proposed plans and my reasons are as follows.

### **INADEQUATE INFRASTRUCTURE**

The reduced density requirements of the NELA Plan are part of the General Plan and were specifically adopted for the purpose of avoiding and mitigating a whole host of environmental impacts. The failure of the City to implement the General Plan requirements related to population density has real world environmental impacts that affect the health and safety of the public in a negative way. For example, 1) reduced emergency access on our substandard, narrow and already unsafe roadways, and 2) increased density in areas zoned R1-1 that have inadequate infrastructure, are in direct conflict with the NELA Plan to mitigate these problems. The failure of the City to ignore the cumulative impacts of these actions can no longer be swept under the carpet. We believe the City should be required to perform a detailed cumulative impact analysis to address its failure to enforce the mitigation measures in the EIR for the Northeast Los Angeles Community Plan (NELA Plan) General Plan requirements.

### **DRAINAGE / LANDSLIDES**

The existing codes, laws and regulations that have been referenced and mitigation measures have been proposed may seem adequate on paper. But these codes don't take into account many of the factors specific to this site, which neighbors, who have been living in the area for decades and have seen it through different seasons and conditions, are concerned about. A single flooding or landslide occurrence on the site, even if happening once every few years, can have grave consequences and pose a direct threat to the residents of the new development or adjacent properties. CEQA requires the City and the applicant to disclose, analyze, and mitigate not only the direct impacts of the project but also those impacts, taking cumulatively, might rise to a level of significance. The city should disclose the actual impacts of this particular project with numbers and calculations for the amount of storm water runoff, taking into account the permeability of pavings and hardscape, as well as the proposed road, instead of just deferring to the existing general building codes.

As importantly, it is critical that as a condition for any development on that site, the City should require the applicant to disclose to future buyers of the proposed houses that the neighboring properties will not be liable for any storm water management and runoff problems, and the buyers (future owners) will be liable for any damages occurred properties down on Cynthia Ave and flooding issues for the neighboring properties.



In the absence of an overall development massing study and analysis of all 4 proposed buildings, currently in the MND wrongly classified as...

|                                                                                                     | Potentially significant impact | Less than significant with mitigation incorporated | Less than significant impact | No impact |
|-----------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|------------------------------|-----------|
| c. Substantially degrade the existing visual character or quality of the site and its surroundings? |                                |                                                    | ✓                            |           |



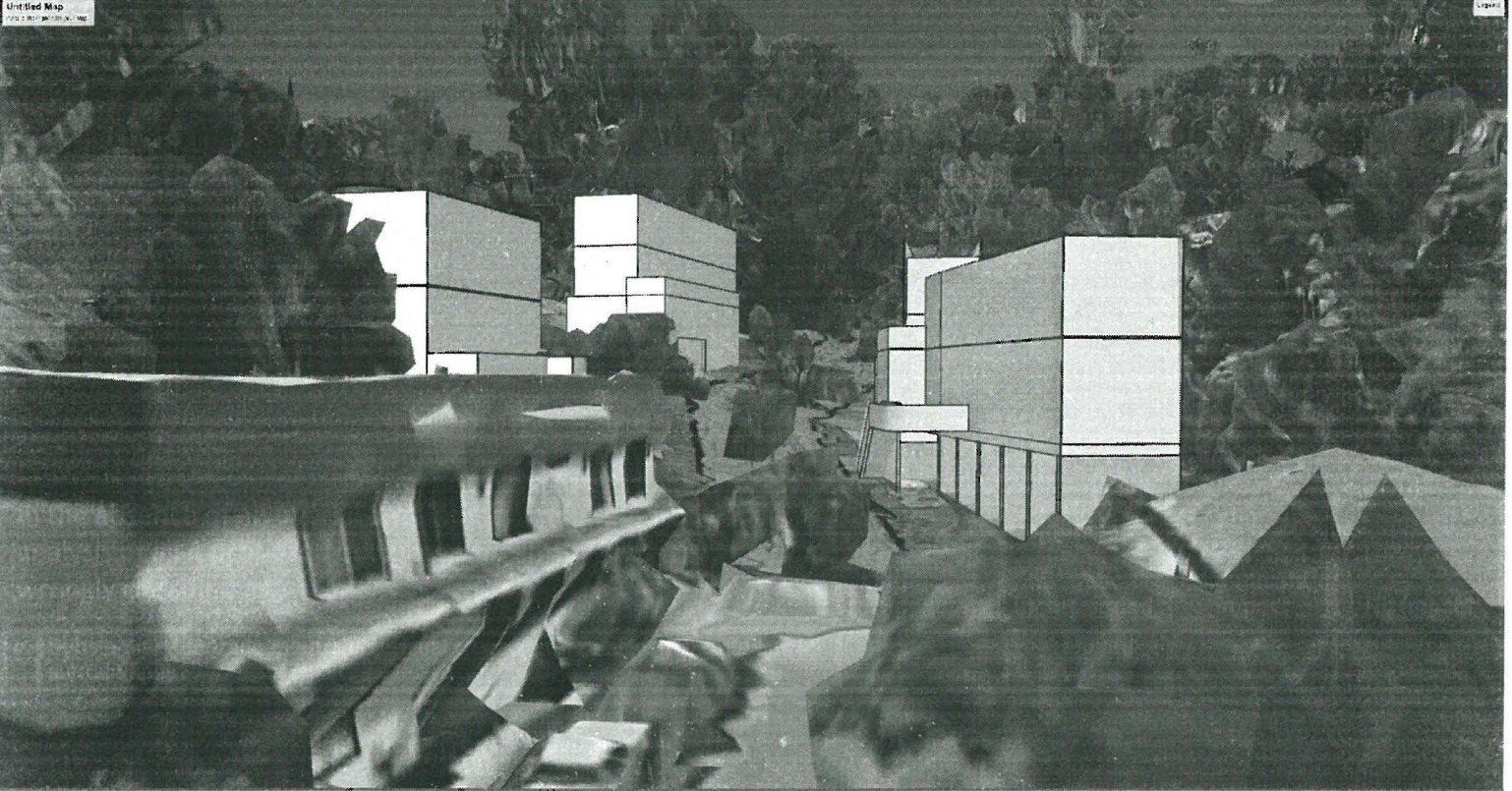
Professional 3D model massing study provided by Appellant, Jaroslaw Bieda, using architectural drawings disclosed by the Developer.

MND #1. Aesthetics: c - Substantially degrade the existing visual character or quality of the site and its surroundings. **Should be: Potentially significant impact,** after studying the massing, proportions, orientation, spacing and scale of the proposed 4 buildings development.



In the absence of an overall development massing study and analysis of all 4 proposed buildings, currently in the MND wrongly classified as...

|                                                                                                     | Potentially significant impact | Less than significant with mitigation incorporated | Less than significant impact | No impact |
|-----------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|------------------------------|-----------|
| c. Substantially degrade the existing visual character or quality of the site and its surroundings? |                                |                                                    | ✓                            |           |



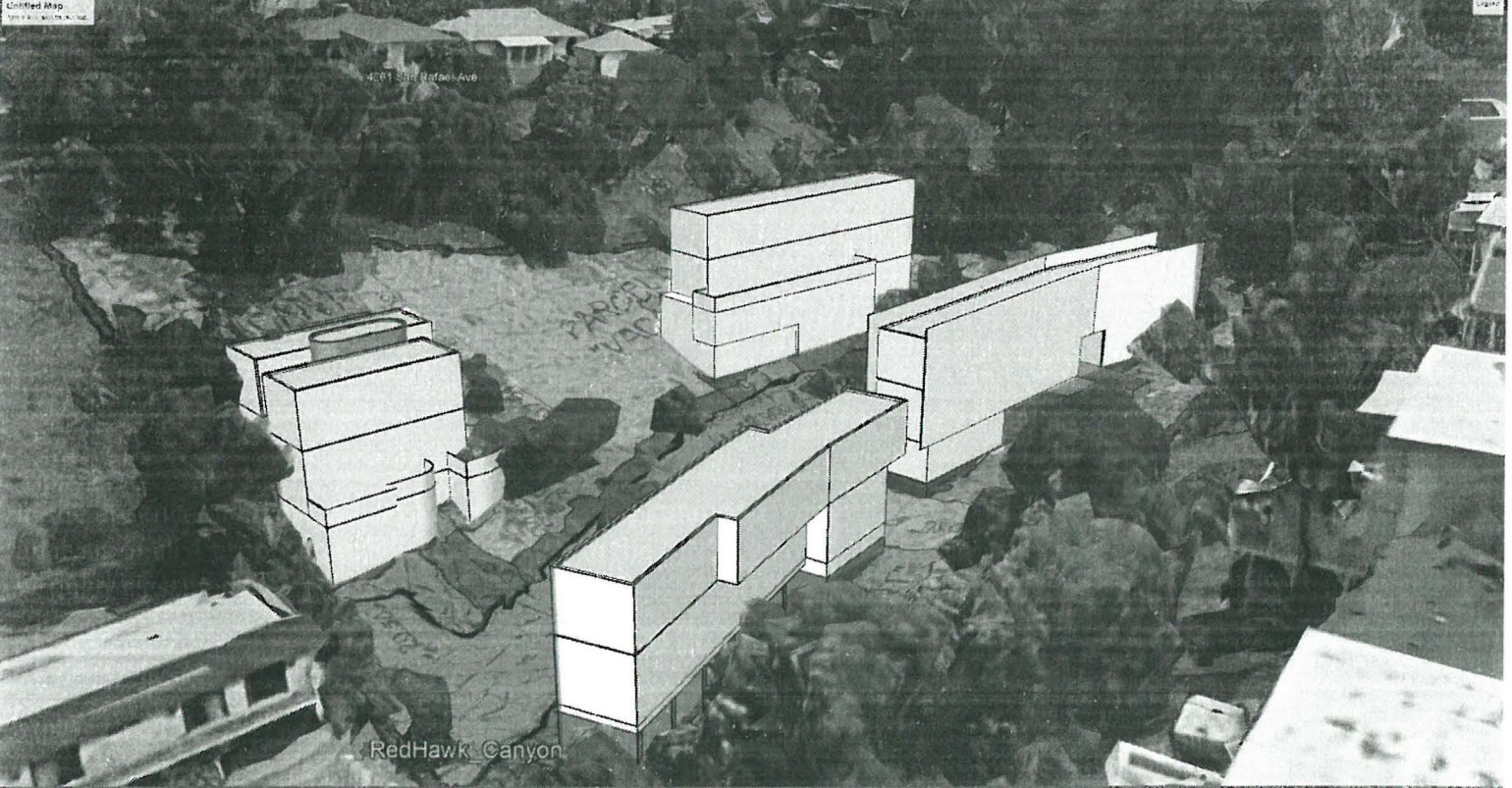
Professional 3D model massing study provided by Appellant, Jaroslaw Bieda, using architectural drawings disclosed by the Developer.

MND #I. Aesthetics: c - Substantially degrade the existing visual character or quality of the site and its surroundings? **Should be: Potentially significant impact,** after studying the massing, proportions, orientation, spacing and scale of the proposed 4 buildings development.



In the absence of an overall development massing study and analysis of all 4 proposed buildings, currently in the MND wrongly classified as...

|                                                                                                     | Potentially significant impact | Less than significant with mitigation incorporated | Less than significant impact | No impact |
|-----------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|------------------------------|-----------|
| c. Substantially degrade the existing visual character or quality of the site and its surroundings? |                                |                                                    | ✓                            |           |



Professional 3D model massing study provided by Appellant, Jaroslaw Bieda, using architectural drawings disclosed by the Developer.

MND #1. Aesthetics: c - Substantially degrade the existing visual character or quality of the site and its surroundings? **Should be: Potentially significant impact,** after studying the massing, proportions, orientation, spacing and scale of the proposed 4 buildings development.

NOV 13 2019

CITY PLANNING DEPT.  
AREA PLANNING COMMISSION

City Planning Department, City of Los Angeles  
200 Spring Street, 7<sup>th</sup> Floor  
Los Angeles, CA 90012

**Case No. AA-2016-3954-PMLA-1A**

Appeal of the Advisory Agency's determination to adopt the Mitigated Negative Declaration ENV-2016-3955-MND (MND).

I reside at 820 Cynthia Ave. LA 90065, and as such I am a home owner "Within a 500-Foot Radius" of this project. I am, to be precise, 242 feet from the Project.

In this letter I will provide evidence that the MND contains factually incorrect information, performs faulty analysis, and draws incorrect conclusion regarding impacts. This problematic MND may lead to personal injury or death or property damage and I urge the East Los Angeles Area Planning Commission to RECONSIDER its adoption of the MND.

The MND is flawed by making claims that are clearly at variance with actual facts as documented by events supported by videos, photographs and affidavits from neighbors.

The applicant, Richard Loring of Red Hawk Canyon LLC, has been made aware of the facts contained in this letter at a hearing of February 13, 2019 and in subsequent communication with owners. Unfortunately, in many cases, he has chosen to ignore these facts or claim that he is not aware of the facts.

My concerns are contained in Sections "VI. Geology and Soils" and "IX Hydrology and Water Quality" of the MND in question. At the end of each section, below, is a reference to the MND, and there are photos of each section attached to this two-page letter.

- A. Red Hawk Canyon (RHC) "proper" is a 0.99-acre parcel which is surrounded by an additional "drainage" of 5.36 acres. This drainage can be calculated by referring to a topographical map and identifying all land "up slope" from RHC proper. It includes the following ridges: above RHC to the east (San Rafael Avenue), above RHC to the south (Sea View Lane) and above RHC to the west (San Andreas Avenue). This is an incontrovertible fact.
- B. The hydrology of the RHC "drainage" results in a combination of sub-surface and surface water into RHC "proper", a 6.36:1 concentration. This is also an incontrovertible fact; the water has no other place to go, forced by gravity drain into RHC proper.
- C. As a consequence, the hillsides of RHC are subject to unstable geological conditions or soil types that would be susceptible to failure when saturated. [VI (d)]
- D. Furthermore, the sub-surface water in RHC proper and its upslope drainage has caused upwelling or percolation of water at the northern terminus of San Andreas Avenue and the southern terminus of Cynthia Avenue. [VI (f)]
- E. We have documented two landslides during winters periods 2001-2002 and 2005-2006. These landslides began in RHC proper due to saturated soil in the rainy season and

- proceeded to propagate upslope and cause damage to the, go offsite properties at 4267 San Rafael Avenue and 4653 San Andreas Avenue. [VI (f)]
- F. RHC do not have access to a storm water drainage system. The nearest storm water drain is located at 869 Terrance 49, a distance of 0.52 miles away. [IX (a)]
  - G. RHC frequently discharges stormwater down onto Cynthia Avenue with such force and volume that it carries gravel, sand, silt and other debris onto the street and along the gutters, forcing the owners at 830, 836, 840, 846 and 848 Cynthia Ave. to shovel the debris flow from their gutters and sidewalks. Development of any project-related impermeable surfaces will only increase runoff. [IX (a)]
  - H. RHC does in fact have a seasonal stream and spring that runs the entire length of the canyon floor. The private road proposed for RHC would without doubt alter the drainage pattern of this stream and spring, resulting in either increased surface or sub-surface flow and on-site and off-site flooding. [IX (c) and (d)]
  - I. RHC does not now have a storm drain system, nor is one planned to my knowledge. Consequently, it cannot be logically be concluded that the proposed Project would result in less-than-significant impacts related to existing storm-drain capacities or water quality. [IX (e)]
  - J. The landslide of winter 2005-2006 resulted in a significant inundation of mudflow. This mudflow can be seen in RHC at the GPS coordinates 34°06'36.14" N, 118°12'51.23" W. [IX (j)]

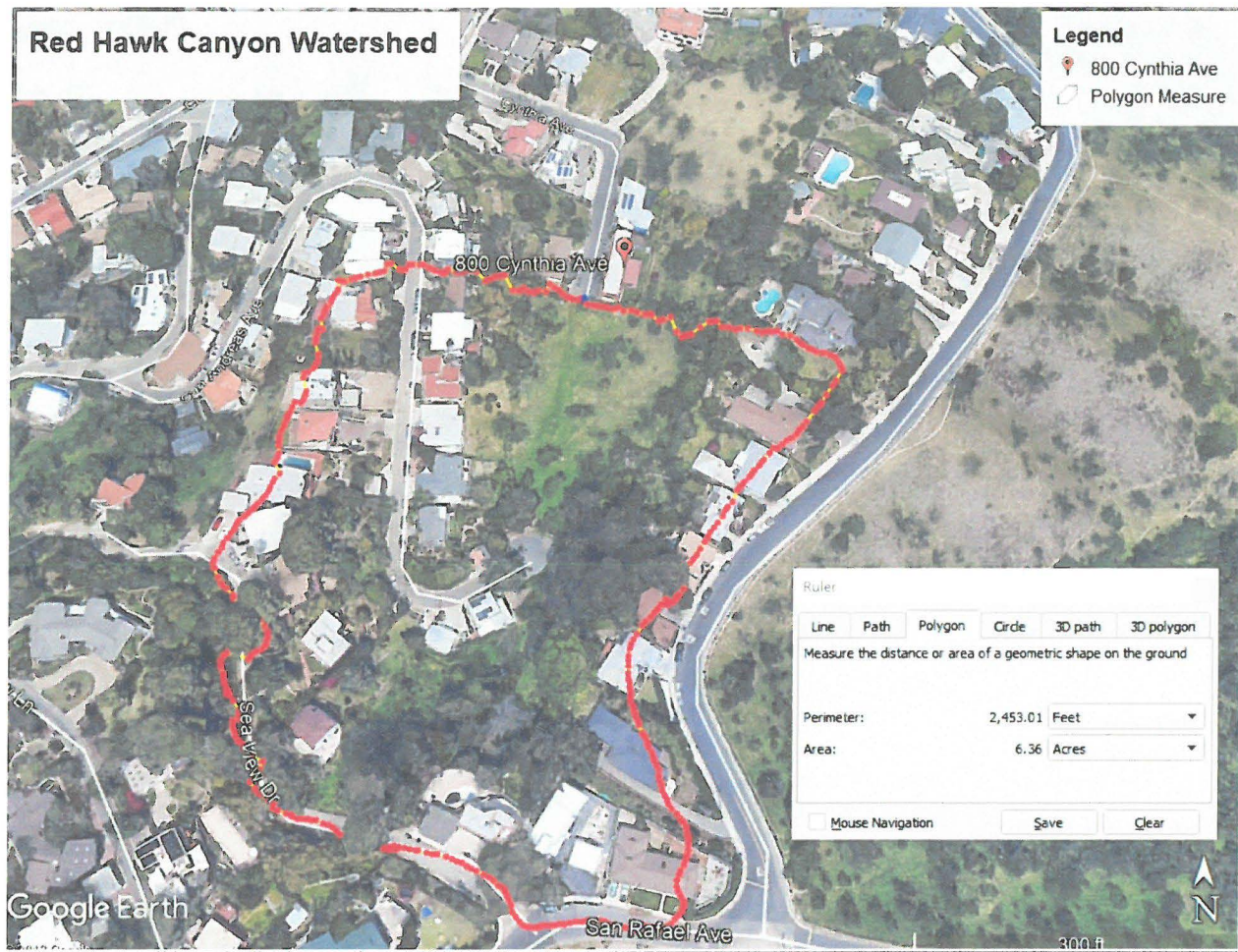
My above 10 concerns are supported by substantial photographic evidence and on-site evidence. See photographs at the end of this letter.

**Taken together as a whole, I believe that ENV-2016-3955-MND contains so many substantial errors of fact, analysis and conclusions, that it needs to be significantly amended or require preparation of an EIR. I urge the City Planning Department of the City of Los Angeles to RECONSIDER adoption of this MND.**

Sincerely yours,



Peter T. Parrish, Ph.D.  
820 Cynthia Ave.  
Los Angeles, CA 90065



A B C. Aerial photograph of Red Hawk Canyon including the ridges formed by San Rafael Avenue, Sea View Drive and San Andreas Avenue.



D-1. Upwelling and percolation of water has significantly and repeatedly damaged Cynthia Avenue.



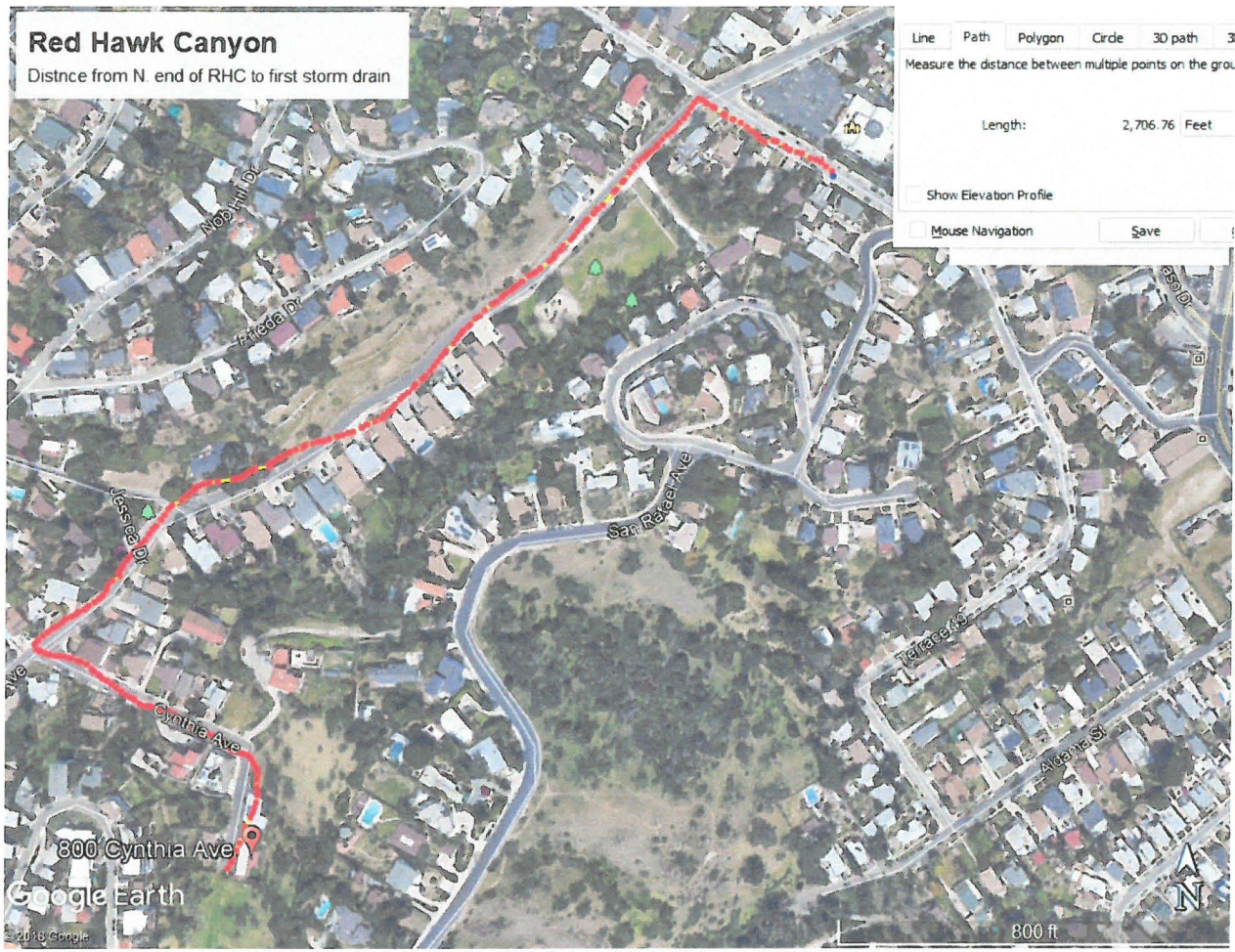
D-2. Upwelling and percolation of water has repeatedly and significantly damaged San Andreas Avenue.



E-1. Landslide Winter 2005-2006. This landslide began in Red Hawk Canyon and destroyed the foundation of a deck at 4267 San Rafael Avenue.



E-2 Landslide of 2001-2002. This landslide began in RHC drainage and wiped out the deck at 4653 San Andreas Avenue. Remains of the deck foundation block are still located to the west of 805 Cynthia Avenue.



F. Location of closest storm water access to RHC -- 869 Terrance 49.



G-1 February 14, 2019. Water runoff from RHC to 830 Cynthia Avenue, consisting of silt up to mid sidewalk.

*Wednesday November 13, 2019*



G-2 February 3, 2019. Gravel and silt runoff from RHC to 830 Cynthia Avenue.



H-1 Seasonal Stream and Spring 4 feet deep and 8 feet in diameter in RHC.



H-2 Attempts to drain the seasonal stream, causing debris flow onto Cynthia Avenue.