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Todd Nelson
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May 12, 2025

VIA EMAIL

Chair Bob Blumenfield and Honorable Members of
the Planning and Land Use Management Committee
Los Angeles City Council
200 N. Spring Street
Los Angeles, CA 90012

clerk.plumcommittee@lacity.gov

Re: 6136 Manchester Project, Council File No. 25-0287, Response to Public Comments

Dear Chair Blumenfield and PLUM Committee Members:

This firm represents the applicant for the 6136 Manchester project ("Project"), which will bring 489 new housing units, including 64 units set aside for Very Low Income households, to the Westchester neighborhood of the City. The PLUM Committee will consider an appeal of the Project at its May 13, 2025 meeting, for which Planning Department staff have provided a comprehensive response to all objections made in the appeal and recommend its denial.

Separate from the appeal, two public comment letters have been submitted to the Project's Council File regarding the alleged existence of an active earthquake fault in the vicinity of the Project site. However, as demonstrated by the sustainable communities environmental assessment ("SCEA") prepared and adopted for the Project, the Project site is not within a State- or City-designated fault zone, no known or potential active faults have been identified as underlying the Project site, and as the SCEA concluded, the risk for surface rupture at the Project site is considered low.

Nevertheless, following the submittal of these recent public comments, Eyestone Environmental, the consultant that prepared the SCEA, as well as the Project's expert geotechnical consultant, have re-examined the SCEA's analyses and conclusions regarding existing and potential faults in the vicinity of the property. As demonstrated by their technical memoranda included as Attachment A, the SCEA's conclusions remain correct and no faults exist at or near the Project site. Therefore, there is no requirement for additional geological analyses or a fault study to be conducted for the Project.

* * *

In summary, as reflected by the entirety of the administrative record, the Project complies with all applicable State and local codes and regulations, including all regulations pertaining to seismic issues, and as concluded by the SCEA, the Project will not result in any potentially significant impacts. We respectfully request that you recommend denial of the appeal and uphold the City Planning Commission's approval of the Project.

Sincerely,

Todd Nelson
Partner
of RAND PASTER & NELSON, LLP

Attachment

cc: Michelle Carter, Department of City Planning
Heather Bleemers, Department of City Planning

Attachment A

eyestone ENVIRONMENTAL

TO: Michelle Carter, Department of City Planning
City of Los Angeles

FROM: Eyestone Environmental

DATE: April 29, 2025

SUBJECT: 6136 West Manchester Avenue; 8651 South La Tijera Boulevard (CPC-2022-6064-DB-MCUP-CDO-SPR-HCA-PHP, ENV-2022-6065-SCEA, Council File No. 25-0287) — Responses to Public Comments Regarding Alleged Fault Zone

CC: Heather Bleemers, Department of City Planning

Eyestone Environmental prepared the Recirculated Sustainable Communities Environmental Assessment (SCEA) for the 6136 West Manchester Boulevard Project (City of Los Angeles ENV-2022-6065-SCEA) (Project), which the Los Angeles City Planning Commission (CPC) approved on February 13, 2025. The CPC's Letter of Determination (LOD) was released on February 21, 2025.

The Los Angeles City Council's Planning and Land Use Management (PLUM) Committee will consider the Project at a hearing scheduled for May 13, 2025. Recently, two public comments regarding the Project were submitted to the Council File for the Project. These two comments made by Jesse Barruquin and Chris Leverich express concern regarding the Project Site's proximity to the Charnock Fault. In particular, Mr. Barruquin's comment suggests that further study would be required due to the Project Site's proximity to the Charnock Fault.

As provided in the Recirculated SCEA, beginning on page 170, and based on the Geotechnical Investigation included as Appendix E of the SCEA, which was approved by the Los Angeles Department of Building and Safety (LADBS) on February 3, 2023, the Project Site is not within an Alquist-Priolo Earthquake Fault Zone or within a City-designated Preliminary Fault Rupture Study Area, and no known active faults underlie the Project Site. As shown in Appendix I of the Geotechnical Investigation, the closest active fault to the Project Site that is considered capable of surface rupture is the Newport–

Inglewood Fault, located approximately 2.6 miles northeast of the Project Site.[1] Mr. Barruquin acknowledges this fact in his own comment by noting that "The State of California does not presently consider the Charnock Fault to be active... It is not included in any official Alquist-Priolo Earthquake Fault Zone mapping, and thus state law did not mandate fault-rupture studies for projects here." Therefore, as set forth in the Recirculated SCEA, as there are no known faults underlying the Project Site, the risk for surface rupture at the Project Site is considered low.

Additionally, according to the Charnock Fault Discussion memorandum prepared by GeoConcepts, Inc., included herein as Attachment A, based on the City of Los Angeles Building Code,[2] a fault investigation would be required for non-exempt projects located in an Earthquake Fault Zone. The Earthquake Fault Zone is a regulatory zone surrounding the surface traces of active faults. An active fault is defined as a fault that has ruptured in the last 11,000 years, and other faults that have not ruptured are considered inactive. As noted above, the Project Site is not located in the Earthquake Fault Zone identified by the State of California or the City of Los Angeles; therefore, as concluded in the Charnock Fault Discussion memorandum, a fault study or additional geologic analyses are not warranted or required.

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[1] GeoConcepts, Inc., Preliminary Geotechnical Engineering Investigation—6136 West Manchester and 8651 South La Tijera, February 7, 2022, page 32. (Appendix E.2 of this SCEA).

[2] Note that the City of Los Angeles Building Code, and not the Los Angeles County Building Code cited by Mr. Barruquin, applies to the Project Site and the Project.

Attachment A

Charnock Fault Discussion Memorandum

GeoConcepts INC
Geology - Geotechnical Engineering

April 25, 2025 Project 6058

CV 6136 Manchester LLC
c/o CityView
Attn: Stephen Roberts
1901 Avenue of the Stars Suite 1900
Los Angeles, California 90067

Subject: **CHARNOCK FAULT DISCUSSION**
6136 West Manchester Ave
8651 South La Tijera Blvd
Westchester, California

References:

1) Preliminary Geologic and Geotechnical Engineering report by GeoConcepts, Inc. covering the subject site, dated February 7, 2022.
2) Infiltration Report by GeoConcepts, Inc. covering the subject site dated July 19, 2022.
3) Update Report by GeoConcepts, Inc. covering the subject site dated July 27, 2022.
4) Soils Report Approval Letter by the City of Los Angeles, Department of Building and Safety covering the subject site dated February 3, 2023.

Dear Mr. Roberts:

Pursuant to your request, presented herein is a discussion of the Charnock Fault in relation to the proposed project that was approved by The City of Los Angeles, Department of Building and Safety.

Based on the City of Los Angeles Building Code, a fault investigation would be required for non-exempt projects located in an Earthquake Fault Zone. The Earthquake Fault Zone is a regulatory zone surrounding the surface traces of active faults. An active fault is defined as a fault that has ruptured in the last 11,000 years, and other faults that have not ruptured are considered inactive. The site is not located in the Earthquake Fault Zone, therefore a fault study or additional geologic analyses are not warranted or required.

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

Respectfully submitted,
GeoConcepts, Inc.

Raffi Dermendjian
Project Engineer
PE C. 88261
RD: 6058-5

Distribution: (1) Addressee

CITY OF LOS ANGELES
CALIFORNIA

SOILS REPORT APPROVAL LETTER

February 3, 2023

LOG # 124730
SOILS/GEOLOGY FILE - 2

CV 6136 Manchester, LLC
1901 Avenue of the Stars
Los Angeles, CA 90067

TRACT: RANCHO SAUSAL REDONDO (PAT 1-507/508 SEC 31 T2S R14W)
LOT(S): LT 38 (Arb 65)
LOCATION: 6136 W. Manchester Ave. (aka 8651 S. La Tijera Blvd.)

CURRENT REFERENCE REPORT/LETTER(S)	REPORT No.	DATE OF DOCUMENT	PREPARED BY
Update Report	6058	07/27/2022	GeoConcepts, Inc.
Oversized Doc(s).	``	``	``
Infiltration Report	6058	07/19/2022	GeoConcepts, Inc.
Soils Report	6058	02/07/2022	GeoConcepts, Inc.
Oversized Doc(s).	``	``	``

The Grading Division of the Department of Building and Safety has reviewed the referenced reports that provide recommendations for the proposed five to eight story mixed use building with two or three levels of subgrade parking as shown on the plan and cross sections provided in the report dated 07/27/2022. The site exploration consisted of seven borings excavated to a maximum depth of 41 feet. The earth materials at the subsurface exploration locations consist of up to one feet of uncertified fill underlain by native soils. The consultants recommend to support the proposed structure(s) on conventional foundations bearing on native undisturbed soils.

The subsurface exploration encountered groundwater at a depth of 35 feet, and the depth to historical high groundwater level is about 40 feet below the surface, according to the consultants.

As of January 1, 2023, the City of Los Angeles has adopted the new 2023 Los Angeles Building Code (LABC). The 2023 LABC requirements will apply to all projects where the permit application submittal date is after January 1, 2023.

The referenced reports are acceptable, provided the following conditions are complied with during site development:

(Note: Numbers in parenthesis ( ) refer to applicable sections of the 2023 City of LA Building Code. P/BC numbers refer the applicable Information Bulletin. Information Bulletins can be accessed on the internet at LADBS.ORG.)

1. In the event the basement grade is to be established below the current groundwater level or historically highest groundwater level (whichever is higher), a supplemental report including

design recommendations and calculations for the proposed structure to resist uplift and hydrostatic pressures shall be submitted to the Department for review.

2. Infiltration is not approved in this letter. In the event, an on-site infiltration system is proposed, provide a supplemental report in accordance with the requirements of the Information Bulletin P/BC 2020-118 to address the Update Report dated 07/27/2022.

3. Provide a notarized letter from all adjoining property owners allowing temporary tie-back anchors on their property (7006.6).

4. The soils engineer shall review and approve the detailed plans prior to issuance of any permit. This approval shall be by signature on the plans that clearly indicates the soils engineer has reviewed the plans prepared by the design engineer; and, that the plans included the recommendations contained in their reports (7006.1).

5. All recommendations of the report(s) that are in addition to or more restrictive than the conditions contained herein shall be incorporated into the plans.

6. A copy of the subject and appropriate referenced reports and this approval letter shall be attached to the District Office and field set of plans (7006.1). Submit one copy of the above reports to the Building Department Plan Checker prior to issuance of the permit.

7. A grading permit shall be obtained for all structural fill and retaining wall backfill (106.1.2).

8. All man-made fill shall be compacted to a minimum 90 percent of the maximum dry density of the fill material per the latest version of ASTM D 1557. Where cohesionless soil having less than 15 percent finer than 0.005 millimeters is used for fill, it shall be compacted to a minimum of 95 percent relative compaction based on maximum dry density. Placement of gravel in lieu of compacted fill is only allowed if complying with LAMC Section 91.7011.3.

9. Existing uncertified fill shall not be used for support of footings, concrete slabs or new fill (1809.2, 7011.3).

10. Drainage in conformance with the provisions of the Code shall be maintained during and subsequent to construction (7013.12).

11. Grading shall be scheduled for completion prior to the start of the rainy season, or detailed temporary erosion control plans shall be filed in a manner satisfactory to the Grading Division of the Department and the Department of Public Works, Bureau of Engineering, B-Permit Section, for any grading work in excess of 200 cubic yards (7007.1).

12. All loose foundation excavation material shall be removed prior to commencement of framing (7005.3).

13. Controlled Low Strength Material, CLSM (slurry) proposed to be used for backfill shall satisfy the requirements specified in P/BC 2020-121.

14. The applicant is advised that the approval of this report does not waive the requirements for excavations contained in the General Safety Orders of the California Department of Industrial Relations (3301.1).

15. Temporary excavations that remove lateral support to the public way, adjacent property, or adjacent structures shall be supported by shoring. Note: Lateral support shall be considered to be removed

when the excavation extends below a plane projected downward at an angle of 45 degrees from the bottom of a footing of an existing structure, from the edge of the public way or an adjacent property. (3307.3.1)

16. Where any excavation, not addressed in the approved reports, would remove lateral support (as defined in 3307.3.1) from a public way, adjacent property or structures, a supplemental report shall be submitted to the Grading Division of the Department containing recommendations for shoring, underpinning, and sequence of construction. Report shall include a plot plan and cross-section(s) showing the construction type, number of stories, and location of adjacent structures, and analysis incorporating all surcharge loads that demonstrate an acceptable factor of safety against failure. (7006.2 & 3307.3.2)

17. Prior to the issuance of any permit that authorizes an excavation where the excavation is to be of a greater depth than are the walls or foundation of any adjoining building or structure and located closer to the property line than the depth of the excavation, the owner of the subject site shall provide the Department with evidence that the adjacent property owner has been given a 30-day written notice of such intent to make an excavation (3307.1).

18. The soils engineer shall review and approve the shoring plans prior to issuance of the permit (3307.3.2).

19. Prior to the issuance of the permits, the soils engineer and the structural designer shall evaluate the surcharge loads used in the report calculations for the design of the retaining walls and shoring. If the surcharge loads used in the calculations do not conform to the actual surcharge loads, the soil engineer shall submit a supplementary report with revised recommendations to the Department for approval.

20. Unsurcharged temporary excavations over 5 feet exposing soil shall be trimmed back at a gradient not exceeding 1:1, as recommended.

21. Shoring shall be designed for the lateral earth pressures specified in the section titled "Excavations" starting on page 1 of the 07/27/2022 report; all surcharge loads shall be included into the design.

22. Shoring shall be designed for a maximum lateral deflection of ½ inch where a structure is within a 1:1 plane projected up from the base of the excavation, and for a maximum lateral deflection of 1 inch provided there are no structures within a 1:1 plane projected up from the base of the excavation, as recommended.

23. A shoring monitoring program shall be implemented to the satisfaction of the soils engineer.

24. In the event shoring soldier beams/piles are installed using vibrating/driving equipment in the vicinity of existing structures, the following conditions shall be complied with:

    a. Ground vibrations shall be monitored during pile shoring installation adjacent to the pile driving operation.

    b. Peak particle velocities (PPV) for any single axis shall be limited to ½ inch/second.

    c. Settlement monitoring monuments shall be surveyed as recommended on page 3 of the 07/27/2022 report.

    d. In the event any PPV is measured above the specified threshold (½ inch/second) or any settlement is measured/detected, pile driving shall be stopped and corrective actions shall be submitted to the Department for review before resuming pile driving.

25. In the event predrilling is needed for shoring pile installation:

    a. The diameter of the predrilled holes shall not exceed 75 percent of the depth of the web of the I-beam.

    b. The depth of the predrilled holes shall not exceed the planned excavation depth.

    c. The auger shall be backspun out of the pilot holes, leaving the soils in place.

26. All foundations shall derive entire support from native undisturbed soils, as recommended and approved by the soils engineer by inspection.

27. Footings supported on approved compacted fill or expansive soil shall be reinforced with a minimum of four (#5) deformed reinforcing bars, as recommended. Two (2) bars shall be placed near the bottom and two (2) bars placed near the top of the footing.

28. The foundation/slab design shall satisfy all requirements of the Information Bulletin P/BC 2017-116 "Foundation Design for Expansive Soils" (1803.5.3).

29. Slabs placed on approved compacted fill shall be at least 3½ inches thick and shall be reinforced with ½-inch diameter (#4) reinforcing bars spaced a maximum of 16 inches on center each way.

30. Concrete floor slabs placed on expansive soil shall be placed on a 4-inch fill of coarse aggregate or on a moisture barrier membrane. The slabs shall be at least 3½ inches thick and shall be reinforced with ½-inch diameter (#4) reinforcing bars spaced a maximum of 16 inches on center each way.

31. The seismic design shall be based on a Site Class D, as recommended. All other seismic design parameters shall be reviewed by LADBS building plan check. According to ASCE 7-16 Section 11.4.8, for structures on Site Class D sites with S1 greater than or equal to 0.2, the parameter SM1 determined by EQ. (11.4-2) shall be increased by 50%. Alternatively, a supplemental report containing a site-specific ground motion hazard analysis in accordance with ASCE 7-16 Section 21.2 shall be submitted for review and approval.

32. Retaining walls shall be designed for the lateral earth pressures specified in the section titled "Retaining Walls" starting on page 5 of the 07/27/2022 report. Note: All surcharge loads shall be included into the design.

33. Retaining walls/basement walls higher than 6 feet shall be designed for lateral earth pressure due to earthquake motions as specified on page 7 of the 07/27/2022 report (1803.5.12)

    Note: Lateral earth pressure due to earthquake motions shall be in addition to static lateral earth pressures and other surcharge pressures.

34. Basement walls and other walls in which horizontal movement is restricted at the top shall be designed for at-rest pressure as specified on page 5 of the 07/27/2022 report (1610.1). All surcharge loads shall be included into the design.

35. All retaining walls shall be provided with a standard surface backdrain system and all drainage shall be conducted in a non-erosive device to the street in an acceptable manner (7013.11).

36. With the exception of retaining walls designed for hydrostatic pressure, all retaining walls shall be provided with a subdrain system to prevent possible hydrostatic pressure behind the wall. Prior to issuance of any permit, the retaining wall subdrain system recommended in the soils report shall be incorporated into the foundation plan which shall be reviewed and approved by the soils engineer of record (1805.4).

37. Installation of the subdrain system shall be inspected and approved by the soils engineer of record and the City grading/building inspector (108.9).

38. Basement walls and floors shall be waterproofed/damp-proofed with an LA City approved "Below-grade" waterproofing/damp-proofing material with a research report number (104.2.6).

39. The use of acceptable prefabricated drainage composites (also known as geosynthetic subdrain systems), as an alternative to traditionally accepted methods of draining retained earth, shall be determined during structural plan check.

40. Where the ground water table is lowered and maintained at an elevation not less than 6 inches below the bottom of the lowest floor, or where hydrostatic pressures will not occur, the floor and basement walls shall be damp-proofed. Where a hydrostatic pressure condition exists, and the design does not include a ground-water control system, basement walls and floors shall be waterproofed. (1803.5.4, 1805.1.3, 1805.2, 1805.3)

41. The structure shall be connected to the public sewer system per P/BC 2020-027.

42. All concentrated drainage shall be conducted in an approved device and disposed of in a manner approved by the LADBS (7013.10).

43. Prior to issuance of a permit involving de-watering, clearance shall be obtained from the Department of Public Works and from the California Regional Water Quality Control Board.

    1828 Sawtelle Blvd., 3rd Floor, West LA (310) 575-8388

44. The soils engineer shall inspect all excavations to determine that conditions anticipated in the report have been encountered and to provide recommendations for the correction of hazards found during grading (7008, 1705.6 & 1705.8).

45. Prior to pouring concrete, a representative of the consulting soils engineer shall inspect and approve the footing excavations. The representative shall post a notice on the job site for the LADBS Inspector and the Contractor stating that the work inspected meets the conditions of the report. No concrete shall be poured until the LADBS Inspector has also inspected and approved the footing excavations. A written certification to this effect shall be filed with the Grading Division of the Department upon completion of the work. (108.9 & 7008.2)

46. Prior to excavation an initial inspection shall be called with the LADBS Inspector. During the initial inspection, the sequence of construction; shoring; protection fences; and, dust and traffic control will be scheduled (108.9.1).

47. Installation of shoring shall be performed under the inspection and approval of the soils engineer and deputy grading inspector (1705.6, 1705.8).

48. The installation and testing of tie-back anchors shall comply with the recommendations included in the report or the standard sheets titled "Requirement for Tie-back Earth Anchors", whichever is more restrictive. Research Report #23835

49. Prior to the placing of compacted fill, a representative of the soils engineer shall inspect and approve the bottom excavations. The representative shall post a notice on the job site for the LADBS Inspector and the Contractor stating that the soil inspected meets the conditions of the report. No fill shall be placed until the LADBS Inspector has also inspected and approved the bottom excavations. A written certification to this effect shall be included in the final compaction report filed with the Grading Division of the Department. All fill shall be placed under the inspection and approval of the soils engineer. A compaction report together with the approved soil

report and Department approval letter shall be submitted to the Grading Division of the Department upon completion of the compaction. In addition, an Engineer's Certificate of Compliance with the legal description as indicated in the grading permit and the permit number shall be included (7011.3).

50. No footing/slab shall be poured until the compaction report is submitted and approved by the Grading Division of the Department.

LEILA ETAAT
Structural Engineering Associate II

LE/le
Log No. 124730
213-482-0480

cc: GeoConcepts, Inc., Project Consultant
WL District Office