CITY OF BURBANK

OFFICE OF THE CITY COUNCIL

March 30, 2006

Jawahar P. Shah
City of Los Angeles
Public Works, Bureau of Sanitation
Wastewater Engineering Services Division
2714 Media Center Drive
Los Angeles, California 90065

Dear Mr. Shah:

A recent e-mail correspondence from Los Angeles City Councilmember Tom LaBonge suggested that a new alignment be considered for the Glendale-Burbank Interceptor Sewer (GBIS). It is our understanding that this new "hybrid" alignment would connect the eastern portion of the GBIS South Alignment along Forest Lawn Drive with the western portion of the GBIS North Alignment in Riverside Drive through Clybourn Avenue, Rose Street, or Pass Avenue. This hybrid alignment is also discussed in the Joint Report to City Council Motion 06-0234 where it is named Modified Alignment No. 1.

As discussed in a previous letters sent by the City of Burbank, we have serious concerns regarding the significant adverse environmental impacts that would be created by either the northern alignment or Modified Alignment No. 1. The environmental impact analysis of the northern alignment is legally inadequate. Further, there is no analysis of Modified Alignment No. 1. Although it primarily consists of the eastern half of the southern alignment and the western half of the northern alignment, this alternative could require additional shaft sites or air treatment facilities; none of which are described or analyzed in the Draft EIR. These and other legal inadequacies in the Draft EIR deprive the public of a meaningful opportunity to review the significant adverse impacts of the GBIS. Therefore, both the GBIS North Alignment and the Modified Alignment No. 1 must be rejected.

In addition to suggesting Modified Alignment No. 1, the Joint Report to City Council Motion 06-0234 dismissed an alignment alongside the Los Angeles River as a feasible alternative. Alignment alternatives alongside the Los Angeles River are considered in this report under names Modified Alignment No. 2 and 3. The report stated that these alignment alternatives may encounter major rocks which would halt tunneling operation. The City of Burbank believes that that the rejection of Modified Alignment No. 2 and 3 in this report are based on unfounded assertions as explained in the attached letter from Richard C. Slade, a registered geologist.

As explained in this letter, the Los Angeles River has not always been located in its current channelized location, but has meandered several hundred feet or more from its present location. Therefore, the likelihood of encountering boulders alongside the current Los Angeles River channel is not greater than an alignment farther to the north under public streets.

Furthermore, the likelihood of encountering boulders is further diminished because this reach of the river is far away from the steep, upgradient reaches of the headwater areas of the river. It is highly unlikely that the Los Angeles River could have had a sufficient flow volume or flow velocity to deposit massive boulders in the reach being considered for the GBIS tunnel.

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Even if boulders were encountered, adequate technology and construction methods exist to perform tunneling operation through varying conditions. Tunneling is a construction field that comes with a wide range of equipment options and has been used successfully for many years. Many recent advances in tunneling technology allow for sustained production rates even in difficult or changeable soil conditions. The five years available before the construction of the GBIS sewer tunnel will provide Los Angeles sufficient time to evaluate the most recent tunneling technologies.

The City of Burbank does not believe that an alignment alongside the Los Angeles River has been fully analyzed in the Draft EIR. In light of CEQA's mandate that a public agency should not approve a project where feasible alternatives would substantially lessen significant environmental impacts (14 Cal. Code Regs. § 15021), the City of Burbank urges the City of Los Angeles to perform a CEQA analysis of an additional alignment alternatives, including an alignment under the current channelized Los Angeles River.

The deficiencies in the Draft EIR described in this letter, as well as those articulated in the City's previous comment letters, require the addition of significant new information to the Draft EIR (e.g., detailed project descriptions for Modified Alternatives No. 1, 2 and 3; detailed environmental impact analyses for each of these alternatives; and a comparative analysis of all GBIS alignment alternatives). Further, the modified alternatives are proposed in communities not previously addressed in the Draft EIR, with effects upon residents who may have not been concerned about the alternative alignments initially described in the Draft EIR. Therefore, after it has been revised, the Draft EIR must be recirculated for additional public review and comment. Failure to do so will clearly deprive the public of both a meaningful opportunity to review and comment upon substantial adverse environmental effects of the GBIS and feasible ways to mitigate or avoid such adverse effects.

If you have questions for City of Burbank staff, please contact Rodney Andersen at (818) 238-3931.

Sincerely,

Jef Vander Borght
Mayor

Dave Golonski
Council Member

David W. Gordon
Council Member

Marsha R. Ramos
Council Member

Attachment: Letter from Richard C. Slade, Principal Groundwater Geologist

c: Los Angeles Councilmember Tom LaBonge
Los Angeles Councilmember Wendy Gruel
Los Angeles Board of Public Works

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RICHARD C. SLADE & ASSOCIATES LLC
CONSULTING GROUNDWATER GEOLOGISTS

March 28, 2006

To: Mr. Rodney A. Anderson, P.E.
City of Burbank
Public Works Department
275 East Olive Avenue
P.O. Box 6459
Burbank, California 91510-6459

Job No. 312-LAS01

From: Richard C. Slade, Principal Groundwater Geologist
RG, CEG in California
Richard C. Slade & Associates LLC

Re: Preliminary Discussion of Key Factors for Alternative Alignments
Glendale/Burbank Interceptor Sewer (GBIS)
Vicinity Los Angeles River
Between Burbank and North Hollywood

This Memorandum has been prepared to provide our preliminary discussion of key factors for alternative alignments for the proposed Glendale/Burbank Inceptor Sewer (GBIS), in the vicinity of the Los Angeles River along the southern margin of the San Fernando Groundwater Basin. The alternative alignments discussed herein are those shown on a Draft map titled, EIR Alignments (Modified) and dated March 15, 2005.

Due to the time constraints imposed on this project, our work and our opinions provided herein were limited to:

- our long-term experience in hydrogeology, including prior projects for the nearby cities of Burbank and Glendale;
- our cursory review of driller's logs in our office files for historically-drilled water wells in the area;
- review of a few recent emails prepared by others for the projects;
- our review of selected geologic maps of the area which show the various earth materials mapped at ground surface by others;
- and a brief review of the report of the July, 1962 Report of Referee prepared for the final adjudication of the groundwater resources of the San Fernando Groundwater Basin.

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Also due to the time constraints, there was no time available to conduct any field reconnaissance visits, or to perform drilling exploration, laboratory testing or pumping tests in any water wells or groundwater monitoring wells in the project area.

Selected Key Factors to Consider

The key factor when considering the sewer tunnel alignment is the subsurface geologic conditions. Geologic earth materials that could be encountered during construction could include: deeply weathered to hard crystalline granitic-type rocks or older sedimentary rocks within the shafts or tunnels constructed within the Santa Monica Mountains; relatively much younger alluvial deposits beneath and adjacent to the current channel of the Los Angeles River; and/or older sedimentary strata that may underlie the alluvial deposits beneath and/or adjacent to the river alluvium.

None of the above earth materials are likely to contain the “major rocks” or even “boulders” that have been reported by others to be a significant detriment to the proposed tunneling method(s). “Major rocks,” from a geologic perspective, would only be the granite to be encountered along the “Zoo Branch” alignment between the Pecan Grove Site on the east and the Travel Town Shaft Site on the west. However, even if hard granite or cemented sedimentary rocks were to be encountered along some of this alignment, tunneling should be able to readily proceed. Very importantly, during tunneling in the granite and/or older sedimentary rocks in the hillsides, significant inflows of groundwater would not be as likely to occur as they would during tunneling on the valley floor to the north. This would provide several major benefits: greatly reduced rates and volumes to pump out; greatly reduced volumes of groundwater to temporarily store in Baker tanks and subsequently treat for total suspended solids prior to discharge to the Los Angeles River in accordance with National Pollutant Discharge Elimination System (NPDES) regulations; and greatly reduced potential to encounter groundwater contamination by volatile organic compounds (VOCs), thereby precluding expensive VOC treatment of the groundwater prior to its discharge. Further, there may be fewer significant issues with the Watermaster of the San Fernando Groundwater Basin dealing with pumping rights from this hard rock.

Further, “boulders,” defined from a geologic perspective, signifies a rock (or clast) size that is equal to or greater than approximately 10 inches in size. Certainly, from a tunneling

perspective, rock clasts of 10 inches or more in size will likely be encountered in the alluvium along the river. Such clast sizes could also be encountered in some of the older sedimentary strata that underlie the river alluvium. However, it is known that the Los Angeles River has meandered laterally (moved around) perhaps several hundred feet or more from its present location. Hence, the alignment, width and thickness of the geologically young river alluvium have historically varied over time; these alluvial sediments have been cut into the somewhat geologically older sedimentary strata that comprise the remainder of the San Fernando Groundwater Basin. Due to these facts regarding the ancestral river, the gravels, cobbles and rare boulders (rock clasts greater than 10 inches in size) of the alluvium could be encountered at depth both along the current river alignment but also within a few hundred feet on either side of the current alignment. As a result, driving a tunnel beneath the current river course would not likely encounter substantially more boulders than an alignment to the north beneath the urbanized area.

It must be recognized when reviewing driller's logs of water wells in the region that drillers are not geologists. They tend to use and record their own special terms for the drill cuttings they see as drilling proceeds. Several driller's logs mention "gravel and boulders" in the drill cuttings but they sometimes even simultaneously say these "gravel and boulders" are "3 inches to 5 inches" in size (e.g., see log of Well 3844C or 3904J). Hence, the driller's term for "boulders" is really the more accurate geologic term for cobbles (rock clasts smaller than 10 inched in size).

Lastly, in regard to "boulders," it is considered to be highly unlikely that huge boulders would be encountered anywhere along any proposed tunnel alignment within the alluvium of the river. This is simply because this reach of the river is a very long distance from the topographically steep, upgradient reaches of the headwater areas of the river. That is, the reach of the river in the tunnel area is a long distance from the headwaters; any historic Los Angeles River could not have had a sufficient flow volume or flow velocity to deposit large accumulations of massive boulders in this reach, which otherwise might be considered a problem for tunneling.