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November 16, 2021

Ms. Mashael Majid
Planning Director
Council District 4
200 North Spring Street, Ste. 415
Los Angeles, CA 90012

Re: 1991 & 1979N Alexandria Ave Springs

Dear Ms. Majid,

We respectfully request the Council District 4 office's assistance in convincing the Los Angeles Department of Building & Safety (LADBS) to request a Clean Water Act section 401 certification from the Los Angeles Regional Water Quality Control Board (Regional Board) as part of the construction permit-approval process for 1991 and 1979 N Alexandria Ave.

When a development project may cause dredge or fill material to discharge into and impact waters of the State, an applicant must seek and obtain a section 401 water quality certification from the Regional Board before obtaining development permits. These certifications ensure that development projects are consistent with water quality standards and will not impair the State's waters.

There is evidence that the properties at 1979 and 1991 N. Alexandria Avenue may have waters such that any development project on the properties would require a water quality certification. Neighbors have reported and the real estate listing for the properties indicates that there are artesian springs on one or both of the properties. <https://www.redfin.com/CA/Los-Angeles/1991-N-Alexandria-Ave-90027/home/7133549>. If these springs exist, they could be an important part of the watershed and should be protected.

To date, however, no agency has confirmed whether the properties contain artesian springs. Even so, LADBS is proceeding with its review of construction

permit applications for 1979 N. Alexandria and is expected to begin a similar process for 1991 N. Alexandria shortly.

Without first determining whether the springs exist, the LADBS engineer reviewing the permit applications has denied that a section 401 water quality certification is necessary. The Bureau of Engineering (Environmental Management Group and Clean Water Infrastructure Program) and the Los Angeles Sanitation and Environment Watershed Protection Division have agreed. And the Regional Board has indicated that it cannot investigate whether a section 401 certification is required and would be granted unless it has more information about the properties from LADBS. Consequently, there is a high risk that the construction

permits will be approved for these properties without an adequate determination whether the artesian springs exist and a section 401 certification is necessary.

It has been frustrating that no agency will step up to take a look at this situation and determine whether the artesian springs exist. We fear that no analysis will be done regarding the springs because each agency claims that it will only act if another agency provides it with more information. But this circularity of agency oversight cannot

serve as an excuse to permit the degradation of critical water resources. Especially in this time of drought, we ask that you ensure that LADBS or the Regional Board determines whether artesian springs exist on these properties and, if so, LADBS requests a section 401 certification from the Regional Board before any permits are approved. We cannot afford to miss this opportunity to identify and protect our precious watershed.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jon Deutsch", with a large, stylized flourish above it.

Jon Deutsch, President
Los Feliz Neighborhood Council