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March 11, 2019

VIA E-MAIL AND U.S.P.S.
City Planning Commission
Department of City Planning - City of Los Angeles
200 N. Spring St., Room 763
Los Angeles, CA 90012

Re: Case #CPC-2018-4231-DB-WDI
11955 West Culver Boulevard
Hearing on Thursday, March 14, 2019

Ladies and Gentlemen:

The Del Rey Residents Association Land Use & Planning Committee opposes the project at 11955 West Culver Boulevard (4460 S Inglewood Blvd - 4466 S. Inglewood Blvd.) due to our position that it is the wrong building for this location. This is based on these findings:

- 1) **The building is too large for the site.** - Too many exceptions to the existing Zoning Codes are required in order to make it 'fit' on this property, including reduction in side yard setback, reduction in street widening dedications (2 sides), increase in unit density, increase in FAR and decreased requirements for parking. Even though it is described as a "five-story building", one story has a mezzanine and it is actually the height of a six-story building. There are no buildings this tall in this neighborhood.
- 2) **Public safety concerns have not been addressed.** - This project is on "Little Culver", which is a cul-de-sac, and while the zoning between Culver Blvd. and Washington Blvd. allows for multi-family units, the Palms Mar

Vista Del Rey Community Plan did not contemplate the impact of density bonuses on multi-family projects. As a result of recent construction, the streets are now lined with parked vehicles, and the area cannot be evacuated easily in case of emergency. (When the 405 freeway shut down in December, all of the north/south streets in Del Rey were jammed for hours.) The Inglewood Blvd./Culver Blvd. intersection is heavily used by families with children because of the church (St. Gerard's) and school (ICEF) directly across Inglewood Blvd. and the two additional elementary schools nearby (Braddock Drive and Stoner Avenue). In addition, the City is planning to route bicycle traffic up Inglewood Blvd. from Playa Vista to the Culver Blvd. median. The design of this project must consider the safety of pedestrians and cyclists in the area.

- 3) **This property should be used primarily for commercial and retail uses.** This property is in one of the very few neighborhood commercially zoned areas in Del Rey. It is an essential part of the Inglewood/Culver intersection Commercial Hub and if it is lost to become primarily housing, the opportunity to help create a walkable neighborhood with local services here will be lost forever. This is not a true mixed use project – it is a residential project with an insignificant commercial component in a location that needs a commercial development.
- 4) **The ground floor of this project needs to be all commercial space.** This is what the neighborhood needs and that is what the community plan supports. Maybe this means going another level down for parking and reducing the number of floors and units of residential in order to provide this space and the parking required for it. If that is not feasible, then the development plan is inappropriate. Del Reyans want to reduce the need to commute to jobs and services, and that cannot occur if potential commercial space is replaced by residential development.
- 5) **This project is incompatible with the surrounding context, and it does not provide the community with the land use that it needs.** We recommend that the requested actions be denied and the project as designed not be approved. We recommend the following modifications be made to the project and then for the project to be resubmitted and presented to the Community prior to approval:
 - a. Comply with side yard setback requirements and the dedication requirement on Inglewood Blvd. A full highway dedication would enable the addition of a center turn lane on Inglewood Blvd.. Currently, anyone turning into the alley must block a lane of traffic,

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City Planning Commission

Case #CPC-2018-4231-DB-WDI

which prompts other drivers to make unsafe lane changes that result in accidents.

- b. Impose a "no left turn" policy for cars entering and exiting the project on Inglewood Blvd.
- c. Bring all sidewalks around the project up to code.
- d. Contribute to an elongation of the left turn pockets on Culver Blvd.
- e. Reduce the height of the building by 1 floor and to the maximum height allowed for a density bonus residential building of this type (56'),
- f. or do not allow FAR increase to 2.67:1, from allowable 1.5:1.
- g. Reduce the amount of residential floor area.
- h. Increase the Commercial/Retail floor area to at least 75% of the building footprint. Commercial use could be on 1st and 2nd floor.
- i. Provide appropriate parking for the new mix of uses.

This letter was voted on and approved by our board of directors on Monday, March 11, 2019.

Very truly yours,

DEL REY RESIDENTS ASSOCIATION



By Elizabeth A. Pollock, President

cc: Jordann Turner, Expedite Processing Section
Councilmember Mike Bonin
Len Nguyen, CD11 Senior Planning Deputy
Hannah Levien, CD11 Field Deputy Del Rey



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Via Email and Overnight Mail

March 11, 2019

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Re: Mitigated Negative Declaration for 3170 West Olympic Blvd, aka MND--NG-18-063-PL, Case Number ENV-2016-3663, VTT-74311-CN-1A, Related Case: CPC-2016-3662-CU-DB-SPR. (Planning Commission Agenda Item #7). Notice of Intent to Rest on Written Comments.

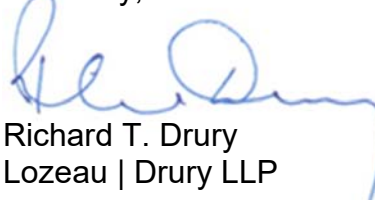
Dear President Millman, Honorable Members of the Planning Commission, et al:

I am writing on behalf of Supporters Alliance for Environmental Responsibility ("SAFER") and Laborers International Union of North America Local 300 ("LIUNA") and their members living in and near the City of Los Angeles, regarding the Initial Study and Mitigated Negative Declaration ("IS/MND") prepared for the Project known as 3170 West Olympic Blvd, aka MND--NG-18-063-PL, Case Number ENV-2016-3663, VTT-74311-CN-1A, Related Case: CPC-2016-3662-CU-DB-SPR ("Project").

Comment on Mitigated Negative Declaration for 3170 West Olympic Blvd, aka MND--NG-18-063-PL,
Case Number ENV-2016-3663, VTT-74311-CN-1A
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The matter is scheduled for hearing by the Planning Commission on March 14, 2019 at 8:30 a.m. as Agenda Item #7. SAFER and LIUNA Local 300 have filed extensive written comments on this matter, including our comment letter dated March 4, 2019, (which we incorporate herein by reference). We intend to rest on our written comments and make no further comments at the hearing on March 14, 2019. We ask the Planning Commission to issue a decision based on the evidence and arguments set forth in our written comments. Thank you.

Sincerely,



Richard T. Drury
Lozeau | Drury LLP



910 Hampshire Road, Suite V
 Westlake Village, California 91631
 Tel. 805.367.5720 Fax. 805.367.5733

Date: March 8, 2019

To: Nuri Cho, Department of City Planning, City of Los Angeles

Cc: Christopher Pak, Archeon Group

From: Ned Baldwin, Project Manager

Subject: Response to March 4, 2019 comment letter from Lozeau Drury on the MND for 3170 W Olympic Boulevard (ENV-2016-3663)

This memo provides responses to comments contained in the March 4, 2019 letter submitted by Lozeau Drury LLP on the Mitigation Negative Declaration (MND) for the propose project at 3170 W Olympic Boulevard (ENV-2016-3633). Starting on page 4 of the letter is a discussion of alleged issues with the MND. Specifically, the letter raises concerns about the evaluation of health risks from diesel particulate matter, greenhouse gas impacts, and indoor air quality. The following addresses each of the points raised.

A Health Risks from Diesel Particulate Matter

The letter states that the MND did not include a quantitative health risk assessment (HRA) to evaluate construction impacts. We disagree with the comments made regarding the appropriate guidance for when to conduct an HRA.

The City follows SCAQMD guidance for air quality analysis. SCAQMD's Health Risk Assessment (HRA) procedures call for evaluating risk from extended exposures as measured across several years and not for short term construction exposures. SCAQMD uses HRAs for compliance with AB2588, SCAQMD Rule 1401 and Rule 1402, which regulate stationary emission sources.¹ SCAQMD has also adopted guidance on the use of Health Risk Assessments for analyzing mobile source emissions. However, this guidance refers to emissions associated with facilities such as truck stops and distribution centers that feature long term presence of emission sources.² Thus the HRA methodology is not relevant for the short-term construction activities of this Project.

Furthermore, OEHHA's Guidance Manual was prepared to address stationary sources generating toxic air contaminants (such as power plants or factories) with exposure durations measured over multiple years.³ Thus it is not applicable to short-term construction, such as would be the case with this Project. SCAQMD has not developed any recommendations on use of the OEHHA Guidance Manual for CEQA analyses for potential construction impacts. Nor has the City adopted the Guidance Manual or incorporated it into the City's CEQA thresholds or methodologies.

¹ See <http://www.aqmd.gov/home/permits/risk-assessment> and <http://www.aqmd.gov/home/regulations/compliance/toxic-hot-spots-ab-2588/health-risk-assessment>

² See <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>

³ See <http://oehha.ca.gov/air/crn/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0>



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B Greenhouse Gas Impacts

The letter challenges the discussion of GHG impacts in the MND based on the choice of significance thresholds. The letter refers to on a draft white paper released by a SCAQMD working group in 2008 that discussed interim thresholds. The SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where SCAQMD is the lead agency. However, SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects) and has formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds. The City of Los Angeles has not adopted the SCAQMD interim thresholds. As such, they are not applicable to the Project.

C Indoor Air Quality

The letter claims that the construction of the Project would create significant indoor air quality risks due to formaldehyde in building materials. The US EPA and CARB have established standards for formaldehyde content to which building materials must comply. The paper provide as Exhibit B to the letter indicates that “New California homes now have lower indoor formaldehyde levels than previously measured, likely as a result of California’s formaldehyde emission standards”. The paper also shows median data of 20 parts per billion. The letter does not provide the link to cancer risk for this result. As such, substantial evidence has not been presented that the construction materials used in the proposed residences would have significant indoor air quality impacts.



James Williams <james.k.williams@lacity.org>

RE: CPC-2016-3662-CU-DBSPR (3170-3188 W. Olympic Boulevard, Los Angeles)

1 message

Alek <alek3773@gmail.com>

Thu, Mar 7, 2019 at 7:46 PM

Reply-To: Alek <alek3773@gmail.com>

To: darlene.navarrete@lacity.org, lisa.webber@lacity.org, cpc@lacity.org, Monique.acosta@lacity.org, cityclerk@lacity.org

Dear City Representative:

RE: Case No.: **CPC-2016-3662-CU-DBSPR**CEQA No.: **ENV-2016-3663-MND**Address: **3170-3188 W. Olympic Boulevard**, Los Angeles CAArea; **Wilshire Corridor, Koreatown.**

I'm a resident of L.A. -- and a frequent visitor to the Koreatown area. I am a major **supporter** of new mixed-use developments. However, this particular project needs some redesign -- particularly, the **windows mullion pattern**.

(I'm referring to the latest renderings - found on Urbanize.LA)

<https://urbanize.la/post/updated-look-252-unit-development-3170-olympic>

*By the way, I have some background in architecture, urban development, and graphic design -- therefore I am happy to share some of my ideas with you!

A brief introduction: Many new buildings across the city seem to have odd-looking windows -- with a strange design; unfortunately, the proposed 3170-3188 W. Olympic Blvd development is one of them (according to the latest images from Urbanize

LA). The mullion appears to be: the fixed glass panel is located below the operable window:  However, this so-called "Contemporary design" is **architecturally incorrect**, to be honest; it looks like a simply "inverted" version of a traditional mullion. Unfortunately, this design looks extremely awkward and primitive, ruining the entire aesthetics of a new building. It is indeed strange that so many developers are so obsessed with this primitive window mullion!

As a sad example of such aesthetically wrong project is "One Santa Fe". -- Same story: the building itself looks quite decent, but those  ugly windows have successfully **ruined the entire appearance of the building!** Please understand: it is for a reason that you don't see this type of  mullion in any of the buildings throughout most of the world: the world's most renowned architects know better -- to never use this type of mullion, as it is aesthetically incorrect.

Another major drawback of this type of windows -- is that the upper vertical "divider" (separating the operable windows) obstructs a clear skyline view from the window, as eloquently mentioned by one of the developers. As a comparison, the traditional pattern's upper fixed horizontal glass panel  provides a clear, unobstructed skyline view.

Therefore, instead of "contemporary" odd-looking windows, the developer should install this  traditional type of mullion design - the type that is a standard all across the world, including many of our own U.S. cities. Our L.A. Design Studio should truly change its standard, and consider to implement this traditional type  on new developments.

Attached please find a drawing -- **current** design (as described above) versus **suggested**.

I'm also attaching a **revised image of your 3170 Olympic Blvd** development (I took the liberty of photoshopping the windows) -- and applying the improved look of the windows to your original renderings. You can see how much better the building now appears -- once you apply these traditional  types of windows. -- again, see the "**Revised.jpg**" attachment.

Therefore, I strongly recommend that you urge the developer to **Not** include this "inverted" contemporary design: . Instead, if a developer prefers a simpler type of window, then **this traditional**  type of mullion should be the standard.

Finally, I'm attaching several photos -- representing the actual buildings (incl. new developments) with the traditional  type of window mullion.

Otherwise, I am in full **SUPPORT** of this great project.

Thank you for looking into my suggestions! Please feel free to contact me, should you have any questions and/or concerns.

Please also forward my comments to the architectural and development team(s) of the developer, as needed.

All the best!

Sincerely,

~ Alek Friedman

URBAN DEVELOPMENT ADVOCATE,

COMPUTER CONSULTANT / GRAPHIC DESIGNER

323 - 465 - 8511

Los Angeles, California

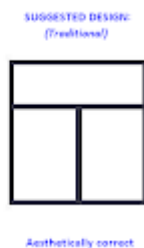
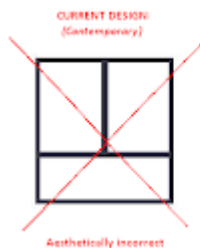
ATTACHMENTS:

- Revised renderings of the 3170-3188 W. Olympic Blvd development;
- Photos of actual buildings with the  mullion pattern.

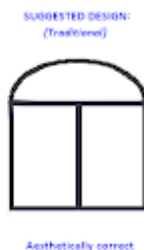
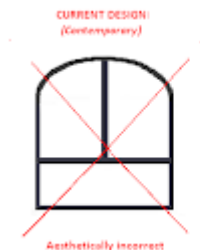
5 attachments



Revised.jpg
65K



Concept 01 - wrong vs right.png
11K



Concept 03 - wrong vs right.png
17K

PRINTABLE Collage - Example 04.jpg
180K



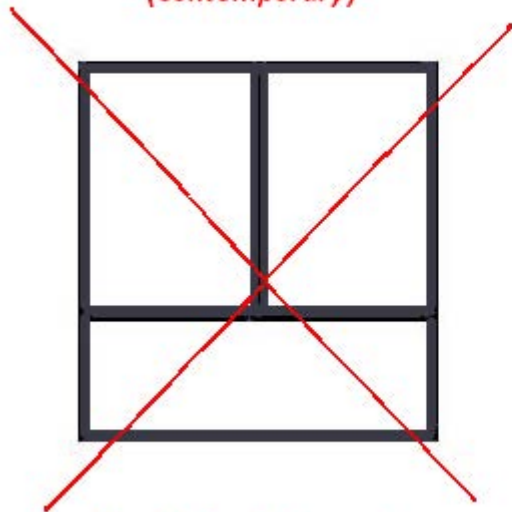
PRINTABLE Collage - Example 05.jpg

164K





CURRENT DESIGN:
(Contemporary)



Aesthetically incorrect

SUGGESTED DESIGN:
(Traditional)



Aesthetically correct

CURRENT DESIGN:
(Contemporary)

SUGGESTED DESIGN:
(Traditional)



Aesthetically incorrect



Aesthetically correct

**New mixed-use developments
in Seattle, WA.**



**Another mixed-use development
in downtown Seattle, WA.**





Orange County,
California



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March 8, 2019

Heather Bleemers
Department of City Planning, Major Projects
221 North Figueroa St, Suite 1450
Los Angeles, CA 90012

Re: 6400 Sunset Boulevard
VTT-74496-CN, CPC-2016-3630-ZC-HD-DB-MCUP-SPP-SPR-WDI
Response to appeal by Coalition to Preserve LA

On behalf of our client, 6400 Sunset LLC (the “**Applicant**”), this letter is in response to the January 28, 2019, appeal filed by Douglas P. Carstens on behalf of the Coalition to Preserve LA (the “**Appellant**”) related to Case Numbers VTT-74496-CN, ENV-2016-3631-SCPE, and CPC-2016-3630-ZC-HD-DB-MCUP-SPP-SPR-WDI. The project consists of the demolition of the existing two-story retail store with its associated subterranean parking and the development of a mixed-use project. The mixed-use project would consist of 200 residential dwelling units and approximately 7,000 square feet of ground-level commercial square footage (collectively, the “**Project**”) at 6400 Sunset Boulevard (the “**Project Site**”). The Applicant respectfully submits that the appeal is not well taken and, for all the foregoing reasons, requests that the City reject the appeal as being without merit.

I. Introduction – Sustainable Communities Project Exemption

Senate Bill 375 (“**SB 375**”), enacted on September 30, 2008 to incentivize development of environmentally superior residential projects near transit, created an exemption to the California Environmental Quality Act (“**CEQA**”) for transit priority projects that meet rigorous statutory requirements.

A transit priority project is defined as a project that shall: (1) contain at least 50 percent residential use; based on total building square footage and, if the project contains between 26 and 50 percent nonresidential uses, a floor area ratio of not less than 0.75; (2) provide a minimum net density of at least 20 dwelling units per acre; and (3) be within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan. Specifically, for a transit priority project to be considered for an exemption, the City Council, after conducting a public hearing, must find that specific environmental criteria, land-use criteria, and one of three affordable housing criteria have all been met.

A Sustainable Communities Project CEQA Exemption (the “**SCPE**”) was prepared for the Project. The Department of City Planning recommended that the City Council consider and determine that the Project satisfies all of the SCPE’s criteria, and is therefore exempt from CEQA pursuant to Public Resource Code (PRC) Section 21155.1, as set forth in the SCPE.

On November 6, 2018, after a duly-noticed public hearing and based on the whole of the administrative record, the City Council’s Planning and Land Use Management Committee made a recommendation to

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the full City Council to determine that the Project is exempt from CEQA pursuant to PRC Section 21155.1. On November 21, 2018, after a duly-noticed public hearing and based on the whole of the administrative record and using its independent judgment, the City Council found that the Project met the criteria for an Sustainable Communities Project exemption and approved the exemption pursuant to PRC Section 21155.1.

The approval of the exemption does not equate to approval of the Project which must still go through the City's rigorous public approval process that could result in approval, modification, or disapproval of the Project. PRC Section 21155.1 merely states that "if the legislative body finds, after conducting a public hearing, that a transit priority project meets all of the requirements of subdivisions (a) and (b) and one of the requirements of subdivision (c), the transit priority project is declared to be a sustainable communities project and shall be exempt...." As previously discussed, the exemption determination for the Project was made by the City Council on November 21, 2018. Thereafter, the City provided public notice and commenced the public hearings for the entitlements.

On January 28, 2019, the Appellant filed this appeal challenging the Advisory Agency's decision to approve a vesting tentative tract map and related approvals, claiming that Advisory Agency erred and/or abused its discretion and that consideration of the vesting tentative tract map was improperly piecemealed from consideration of related approvals necessary for the Project. The appeal also attempts to appeal the CEQA exemption determination of the City Council. Finally, the appeal incorporates the objections raised in a letter submitted by the Appellant to PLUM on September 25, 2018, which letter was based on several incorrect assumptions, as discussed below, which have not been corrected in this appeal.

II. The City Council's Finding of Exemption is Not Subject to Appeal.

The Appellant states that it is appealing the determination that the Project is exempt "pursuant to Public Resources Code section 21151 Subdivision (c)." (Attachment of Appeal, page 1, paragraph 2.) However, that PRC section only relates to appeals of CEQA determinations by a non-elected decision-making body. The exemption for this Project was approved by the City Council, an elected body, on November 21, 2018, prior to the Advisory Agency approving the vesting tentative tract map. That is, at the time of the Advisory Agency's hearing, the SCPE had already been approved by the City Council, the elected decision-making making body of the City of Los Angeles. Therefore, this PRC section does not give rise to grounds for appeal of the SCPE determination. In addition, there is no other statutory authority to appeal the City Council's exemption determination. Accordingly, this appeal of the SCPE is not well taken and should be denied.

III. The Appeal of the Finding of Exemption is Not Well Taken Even if an Appeal Were Permissible.

Even if the right to appeal the City Council's approval of the SCPE were permissible, the appeal is not well taken for the following reasons:

A. The Project Meets the CEQA Requirements for a Sustainable Community Project.

To be considered as a sustainable communities project, a project must be a transit priority project that is consistent with the general use designation, density, building intensity, and applicable policies specified in a sustainable communities strategy. As amply demonstrated in the SCPE approved by the City Council, the Project is a transit priority project and is consistent with the general land use designation, density, and

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building intensity identified in the Southern California Association of Government's ("SCAG") 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy ("2016 RTP/SCS") and meets the requirements of PRC Section 21155 (a) and (b) and Section 21155.1(a) and (b), and one of the criteria of PRC Section 21155.1(c).

The Project is consistent with PRC 21155 (a) in that the Project is comprised of a surface parking lot and a mixed-use building consisting of up to 200 residential units, totaling 224,836 square feet, with 5 percent reserved for Very-Low Income Households, and 7,000 square feet commercial uses, on approximately 0.89 acres, in a highly urbanized part of Hollywood, on a site already occupied by a two-story commercial building and surface parking.

The new building would be constructed on the northern lot where there is an existing retail store. The southern lot, approximately 150 feet to the south of the northern lot, would remain as a surface parking lot. The Project Site is accessible by regional and local transit and the Project would provide on-site bicycle and vehicular parking. The Project is approximately 97 percent residential and the residential mix is 100 percent multi-family. The floor area ratio is 6:1 with an average density per acre of 225 households per acre. In addition, the Project would be at least 15 percent more energy efficient than Title 24 standards and the building and landscaping have been designed to achieve 25 percent less water usage than the average household in the region. The Project is consistent with the SCAG land use designation for the Project Site, as well as the associated density and building intensity assumptions in the 2016 RTP/SCS. (SCPE pages 1 - 3.) Furthermore, the Project is consistent with the applicable goals and policies in the 2016 RTP/SCS, as outlined in Attachment B of the SCPE.

As set forth in the SCPE and summarized below, the Project is a transit project, as defined by PRC 21155 (b) because the Project meets all the enumerated requirements to be considered a transit priority project, as follows:

- (1) The Project will contain at least 50 percent residential use in that it will contain a total floor area of 231,836 square feet that will consist of approximately 7,000 square feet of commercial uses and 224,836 square feet of residential uses which results in approximately 97 percent residential use.
- (2) The Project will provide a minimum net density of at least 20 dwelling units in that it will have a net housing density of approximately 225 dwelling units per acre (200 units/0.89 acre).
- (3) The Project will be within one-half mile of a major transit stop or high-quality transit corridor included in a transportation plan in that all parcels within the Project Site are located within one-half mile of an existing major stop and an existing high-quality transit corridor as shown in the 2016 TRP/SCS. An existing rail station, the Metro Red Line Hollywood/Vine Station, a major transit stop, is located approximately 0.3 miles northeast of the Project Site. Additionally, the intersection of Sunset Boulevard and Vine Street, located 0.13 miles from the Project Site, is also a major transit stop where Metro Local Lines 3, 210 and 302 intersect. These bus lines have frequency of service intervals of 15 minutes or less during peak commute periods. (See Report, Attachment C, Gibson Traffic Study, pages 18-20.) Furthermore, the Project Site is in an area identified as a High Quality Transit Area by SCAG (2016 RTP/SCS Exhibit 5.1).

Thus, the Project is consistent with all three criteria required to qualify as a Transit Priority Project. (SCPE pages 3 - 4.)

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Although the Project qualifies as a sustainable communities project pursuant to PRC Sections 21155, as explained above, and 21155.1, as explained below, Appellants claim, without providing any evidence, that the Project fails to qualify as a sustainable communities project under PRC Section 21155.2. This claim is not well taken since Section 21155.2 is an alternative sustainable communities provision relating to streamlining CEQA review rather than exempting a project that meets the criteria of Section 21155.1. Since the City Council approved the exemption pursuant to Section 21155.1, the PRC section relied upon by Appellants is simply not applicable to the Project.

Additionally, as demonstrated in the SCPE pages 4 - 17, and determined by the City Council, the Project will meet all the requirements of PRC 21155.1. In summary, the Project meets all the requirements Section 21155.1 (a), as follows:

(1) The Project is adequately served by existing utilities, and the Applicant has paid, or has committed to pay, all applicable in-lieu or development fees. The immediate vicinity of the Project Site is fully built out and there are no other transit priority projects that have been approved but not built. The Project Site is currently served by the existing utilities, including water mains, sewer lines and storm drain inlets. Based on the Wastewater and Water Utility Infrastructure Technical Report (SCPE, Attachment D), the Project will be adequately served by existing utilities and the Los Angeles Department of Water and Power has confirmed that there is sufficient capacity to provide water service to the Project. In addition, the Project is consistent with regional growth projections and would not require new water supply entitlements and/or require expansion of existing or construction of new water treatment facilities beyond those already considered in the DWP 2015 Urban Water Management Plan. Moreover, the Project will be required to comply with numerous water conservation measures. Also, the results of the Sewer Capacity Availability Request obtained from the City's Bureau of Engineering confirms that there is sufficient sewer capacity to service the Project. The Project would also not increase the existing peak flow rate or runoff volumes into the stormwater drainage system since the Project Site is currently 100 percent impervious and since the Project would be subject to regulatory measures such as the City's Low Impact Development Ordinance. Finally, the Applicant will pay all applicable in-lieu or development fees pursuant to code requirements and conditions of Project approval. (SCPE pages 4 - 5.)

(2) The Project Site does not contain wetlands or riparian areas and does not have significant value as a wildlife habitat, and the Project does not harm any species protected by the federal Endangered Species Act, the Native Plant Protection Act, or the California Endangered Species Act, and the Project does not cause the destruction or removal of any species protected by a local ordinance. The Project Site is fully developed with a commercial building and a surface parking lot, and is located in a heavily urbanized area of the Hollywood Community Plan area. Review of the National Wetlands Inventory identified no protected wetlands in the vicinity of the Project Site and the Project is not located in a riparian area nor is it located in or adjacent to a Biological Resource Area as defined by the City or within or near a designated Significant Area identified by the County. Thus the Project will not harm any protected species. (SCPE pages 5 - 7.)

(3) The Project Site is not included on any list of facilities and sites compiled pursuant to Section 65962.5 of the Government Code. A preliminary endangerment assessment ("PEA") was prepared for the Project (SCPE, Attachment F). The PEA concluded that asbestos previously present on the Project Site was removed and no further recognized environmental conditions on the Project Site were identified. The PEA concluded that the Project is not located on a site that is included on a list of

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hazardous materials sites nor does it create a significant hazard to the public or the environment. (SCPE page 7.)

(4) The Project Site has been subject to a PEA (SCPE, Attachment F), prepared by an environmental assessor, which determined that there are no hazardous substances on the Project Site and determined that the potential exposure of future occupants to significant health hazards from any nearby property of activity is minimal. The PEA determined that based on the age of the existing building, it is unlikely that asbestos or lead would be encountered during demolition. However, development of the Project Site will require compliance with all regulatory measures to ensure proper handling and disposal of hazardous materials if any are encountered. Further, other than the asbestos that was disposed of prior to construction of the existing building, the PEA did not identify any other recognized environmental conditions, historical recognized environmental conditions on the Project Site. (SCPE page 8 - 9.)

(5) The Project Site does not have a significant effect on historical resources. There are no historical resources on the Project Site. The existing building on the Project Site was built in 2001 and has not been determined to be eligible for listing in any national, state, regional or local register (SCPE, Attachment G). In addition, although several historical resources have been identified in the vicinity of the Project Site, none of these would be directly or indirectly impacted as determined in the Historic Resources Report prepared for the Project (SCPE pages 9 – 10 and Attachment G.)

(6) The Project Site is not subject to any (i) wildland fire hazard, (ii) unusually high risk of fire or explosion from materials stored or used on nearby properties, (iii) risk of public health exposure at a level that would exceed the standards established by any state or federal agency, (iv) being within a delineated earthquake fault zone, or a seismic hazard zone, and (v) is not in a landslide hazard, flood plain, flood way or restriction zone. As described above, the Project Site is located in a highly urbanized area and is fully developed. There are no wetlands in the vicinity of the Project Site and the Project Site is not located within a fire hazard zone. Therefore, the Project Site is not subject to a wildfire hazard. Additionally, the surrounding buildings are occupied by office, retail, restaurant, entertainment and institutional uses which would not typically involve the use or storage of high risk fire or explosive materials. Such properties typically do not contain large quantities of hazardous materials that would pose an unusually high risk of fire or explosion. In addition, although the PEA identified sites of environmental concern within a quarter-mile radius of the Project Site, the risk of release of hazardous materials from these sites is considered unlikely (SCPE, Attachment F, page 21.) Therefore, the Project Site is not subject to an unusually high risk of fire or explosion. (SCPE page 10.)

The PEA also reviewed potentials for methane, radon and vapor encroachment and concluded that the potential for public health exposure from the Project is unlikely. Moreover, the PEA did not identify any other controlled or recognized environmental conditions, historical recognized environmental conditions, or controlled recognized conditions on the Project Site (SCPE, Attachment F, page 21.) Therefore, the Project would not result in public health exposure at a level that would exceed the standards established by any state or federal agency. (SCPE pages 10 and 11.)

The Project Site is not within any designated fault zones. Additionally, a geotechnical investigation was conducted which concluded that there are no known active faults or potentially active faults that cross the Project Site (SCPE, Attachment H, pages 4-12). Therefore, the Project would not result in seismic risk as a result of being within a delineated earthquake fault zone or seismic hazard zone. Similarly, the Project Site is not located in a landslide area and the probability of seismically induced landslides at the Site is low. Nor is the Project Site located in a flood plain and therefore, the risk of

Heather Bleemers

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flooding or seismically induced seiche is remote (SCPE pages 10 - 12, and Attachment H, pages 14 - 15.)

(7) The Project Site is not located on developed open space. The Project Site is not public owned, designated for acquisition by a public agency for use as open space or located on open space land. The Project Site is located in a highly urbanized area and is currently occupied with a building and a surface parking lot. There is no landscaping on the Project Site or in the surrounding sidewalks. Instead, existing power poles and street lights are situated within the Project Site and along the sidewalks surrounding the Project Site. Moreover, the Project Site is not zoned for open space. (SCPE pages 12 – 13.)

(8) Project buildings will be at least 15 percent more energy efficient than required by Chapter 6 of Title 24 of the California Code of Regulations and the Project's buildings and landscaping are designed to achieve at least 25 percent less water usage than the average household use in the region. As shown in the Title 24 Energy Performance Report for the Project (SCPE, Attachment I, page 4), the Project will be 15.3 percent more energy efficient than required by Title 24. As shown in the Utility Report (SCPE, Attachment E, page 3), with implementation of the required water conservation measures, the Project will use approximately 64 percent less water than the average California household. (SCPE pages 13 – 14.)

The Project also meets all of requirements of Section 21155.1(b), as follows:

(1) The Project Site is 0.89 acres and, therefore, the Project will not be more than eight acres in total area. (SCPE page 14.)

(2) The Project will contain 200 residential units and, therefore, the Project will not contain more than 200 residential units. (SCPE page 14.)

(3) The Project Site does not contain any residential uses and, therefore, the Project will not result in any net loss in the number of affordable housing units within the Project area. In fact, the Project will create new residential units, including at least 5 percent for very-low income households. (SCPE page 14.)

(4) The Project will not include any single level building that exceeds 75,000 square feet since it does not include any single level buildings. (SCPE page 14.)

(5) All applicable mitigation measures or performance standards or criteria set forth in the prior environmental impact reports, and adopted findings, have been or will be incorporated into the Project. The Project is subject to compliance with all applicable environmental mitigation measures or performance standards or criteria set forth in four prior EIRs which apply the Project Site: (i) Hollywood Redevelopment Project Final EIR (January 1986); (ii) Hollywood Community Plan Revision Final EIR (July 1988); (iii) Hollywood Redevelopment Plan Amended Final EIR (April 2003), and; (iv) SCAG 2016-2040 RTP/SCS Final Program EIR (April 2016). (SCPE page 15 and Attachment K, Table K-1 and K-2.)

(6) The Project will not be in conflict with nearby operating industrial uses since the nearest site utilized and zoned for industrial uses is located approximately 2,000 feet east of the Project Site and occupied by a production studio. Due to the distance from the Project as well as the buffering provided

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by existing intervening development, the Project will not conflict with the operation of the studio. (SCPE page 16.)

(7) The Project is located within one-half mile of a rail transit station or a within one-quarter mile of a high quality transit corridor included in a regional transportation plan. The Metro Red Line Hollywood/Vine Station is located approximately 0.3 miles northeast of the Project Site. In addition, Sunset Boulevard is considered a high quality transit corridor since it has fixed route bus service provided by Metro Lines 2 and 302 (SCPE page 16 and Attachment C, pages 18-20).

Finally, the Project meets part one of the criteria of Section 21155.1(c) in that it meets both of the following conditions:

- (1) Not less than five percent (10 units) of the Project's housing will be dedicated for Very-Low Income households; and,
- (2) The five percent of the residential units shall be reserved for Very-Low Income households for at least 55 years. The Project operator will enter into a housing regulatory agreement memorializing these requirements and making them binding on any successors or assigns for the full 55 years.

Accordingly, the Project meets the criteria that at least 5 percent of the housing will be for families of Very-Low Income households and that they shall be maintained as housing for very low income households for at least 55 years. (SCPE pages 16 – 17.)

For all the foregoing reasons, the Project qualifies as a sustainable communities project and, therefore, the City Council appropriately approved the SCPE. Nothing in the appeal refutes these facts.

B. The Project Meets the Requirements for Review of a Transit Priority Project.

Notwithstanding the SCPE, including the technical studies attached thereto, Appellant contends, without providing any evidence, that the Project does not meet the requirements for review of a transit priority project because the Project (i) cannot be served adequately by existing utilities, (ii) has a significant effect on historical resources, and (iii) is subject to a preliminary endangerment assessment for release of hazardous substances and the Department of Toxic Substances Control should have been consulted. The comment letter is incorrect in stating that the Project does not qualify for a review of a transit priority project. As discussed above, there is substantial evidence in SCPE confirming that the Project clearly meets or exceeds the criteria enumerated in California Public Resources Code Section 21155.1. As to the three specific issues raised in the letter:

(i) The Project and other projects approved prior to the approval of the Project can be adequately served by existing utilities.

As described in detail on pages 4 and 5 of the SCPE and Attachment D, the Utility Report, the Project and other projects approved prior to the approval of the Project can be adequately served by existing utilities. Specifically, the Project is located in Hollywood, and the Project Site's immediate vicinity is fully built out. The Project Site is currently served by existing utilities, including water mains, sewer lines, and storm drain inlets maintained by the Los Angeles Department of Water and Power and the City's Department of Public Works (Bureau of Sanitation). The Project would connect to the existing utility

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infrastructure. Therefore, and as explained in the SCPE, the Project and other projects approved prior to the approval of the Project can be adequately served by existing utilities.

(ii) The Project will not have a significant effect on historical resources.

The Project will not have a significant effect on historical resources because there are no historical resources on the Project Site. The Project Site is currently occupied by Amoeba Music, a retail record store, and its associated parking facilities, which obtained its original certificate of occupancy in 2001. Historical Resources Group prepared a historic technical report (SCPE Attachment G, Historical Resources Report), which confirmed that the Project Site has not been determined to be eligible for listing in the National Register of Historic Places, California Register of Historical Resources, the Los Angeles Historic-Cultural Monuments Register, or any other local register. Furthermore, the Project Site is not significant because of its association with events or persons.

Specifically, with regard to events, the Historic Report provides:

Amoeba Music as an institution in the music industry was not established until 1990, and the Los Angeles location was constructed less than 20 years in the past. It does not represent exceptional importance, as required for listing in the National Register, and sufficient time has not passed for its inclusion in the California Register or as a City of Los Angeles Historic-Cultural Monument. Therefore, 6400 Sunset Boulevard is not eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, or as a City of Los Angeles Historic-Cultural Monument under Criterion A/1/1. (SCPE Attachment G, Historical Resources Report, p. 29-30)

Specifically, with regard to association of people, the Historic Report provides:

The property has hosted such musical artists as Elvis Costello, Los Lobos, The Roots, P.J. Harvey, Nancy Sinatra, Lucinda Williams, and Pat Benatar. However, individual performances do not meet eligibility thresholds established by the National Park Service for properties that are significant for their association with an important person. In general, a property that is significant for its association with an important person is the property that best represents the person's historic significance, and the length of the association is an important factor. Amoeba Records does not represent the property that best represents the significance of each artist. Therefore, 6400 Sunset Boulevard is not eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, or as a City of Los Angeles Historic-Cultural Monument under Criterion B/2/2. (SCPE, Attachment G, Historical Resources Report, p. 30)

Therefore, based on substantial evidence, the Project will not have a significant effect on historical resources.

(iii) The preliminary endangerment assessment was prepared to determine the potential for exposure of future occupants to significant health hazards from any nearby Project Site or activity.

The comment letter incorrectly asserts that historical automobile repair/maintenance-related uses on or around the Project Site has contaminated the Project Site, which would pose a significant health hazard. The comment letter is correct that the Project Site and various surrounding properties were historically used for automobile repair- and maintenance-uses; however, the potential for exposure of future

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occupants to hazardous substances from a historical release in the immediate vicinity of the Project Site is considered unlikely.

The Phase I environmental site assessment and PEA prepared, by California Environmental, for the Project Site (SPEC Attachment F) concluded:

“No evidence of recognized environmental conditions (RECs), Historical Recognized Environmental Conditions (HREC), or Controlled Recognized Environmental Conditions (CRECs) was identified in connection with the subject property. The nearest listed release site is the aforementioned Texaco service station formerly located at 6407 West Sunset Boulevard. Impact to the subject site from this offsite property is considered unlikely as the site was granted case closure by the LARWQCB. No releases were identified during the research portion of this report on any of the contiguous properties. the potential for exposure of future occupants to hazardous substances from a historical release in the immediate vicinity of the subject property is considered unlikely.” (SCPE Attachment F, PEA, page 21.)

Additionally, the PEA did investigate and determine whether Project was included on any list of facilities and sites compiled pursuant to Government Code Section 65962.5 (SCPE Attachment F, PEA, page 11). Contrary to the contention in the appeal, as part of the PEA, inquiry letters were sent to DTSC and the RWQCB and their on-line data bases were reviewed. Based on that review, the PEA determined that the Project is not listed on these databases. (SCPE page 7.) The appeal presents no evidence to support a contention that the consultation was inadequate or that the findings of the PEA are inaccurate.

Therefore, based on substantial evidence, the Project will not expose future occupants to significant health hazards from any nearby property or activity nor is the Project Site listed pursuant to Government Code Section 65962.5.

C. The Project Includes all Feasible Air Quality Mitigation Measures.

With regards to the claim that the feasible mitigation measures were omitted, Appellant fails to present any evidence that any applicable feasible mitigation measures were omitted. The appeal relies on PRC Section 21155.2 to allege that the Project has failed to comply with CEQA requirements that include an initial study and imposition of mitigation measures. As previously discussed, PRC Section 21155.2 is not applicable to the Project. The exemption determination of the City Council was made because the SCPE amply demonstrates that the Project complies with all the requirements for an exemption pursuant to PRC Section 21155.1 which is separate and distinct from the very different environmental review process for projects proceeding under PRC 21155.2. No initial study is required under PRC Section 21155.1 and, therefore, the appeal is without merit.

Moreover, the SCPE does show that all feasible applicable mitigation measures from four Prior EIRs have been incorporated as a conditions of the Project, should it be approved (SCPE page 15). See SCPE Attachment K, Table K-1 for the mitigation measures from the Prior EIRs that will be applied to the Project as Project Conditions and Table K-2 for mitigation measures from the prior EIRs that will be applied to the Project as a result of compliance with regulatory requirements. These conditions and regulatory compliance measures contain numerous provisions regarding air quality. Nothing further is required for a Sustainable Communities Project exemption under PRC Section 21155.1.

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IV. The Advisory Agency Did Not Err or Abuse Its Discretion in Approving a Vested Tentative Map and Related Approvals.

Appellant contends that the Deputy Advisory Agency erred and/or abused its discretion in approving a vesting tentative map... and related approvals” for the Project (Appeal page 1, paragraph 1). The appeal fails to state any facts to support Appellant’s allegation. The Advisory Agency acted pursuant to City laws authorizing it and exercising its authority given to it under Los Angeles Municipal Code (the “LAMC”) Section 17.06A.2 and 17.15. The determination of the Advisory Agency includes numerous conditions for approval and is supported by findings of fact and substantial evidence. Therefore, the appeal of the Advisory Agency’s approval is without merit.

V. There Was No Impermissible Piecemealing of Related Approvals.

Appellant contends that “[c]onsideration of VTT-74496-CN is improperly piecemealed from consideration of related approvals necessary for the Project in CPC-2016-ZC-HD-DB-MCUP-SPP-SPR-WDI (Appeal, page 1, paragraph 1.) However, Appellant fails to provide any factual or legal basis for the allegation that the Vesting Tentative Tract Map approval was impermissibly piecemealed from other Project approvals. The Advisory Agency is authorized by statute to act on a request for a tentative tract map.

As stated in LAMC Section 17.06A.2: The Advisory Agency shall approve, conditionally approve or disapprove the Tentative Map within 50 calendar days after the filing of the Map with the City or within such additional time as mutually agreed upon by the Advisory Agency and the Subdivider.” The Advisory Agency approved the requested Vesting Tentative Tract Map for the Project pursuant to LAMC Section 17.15 which authorizes the filing of a vesting tentative tract map. The LAMC does not prohibit multiple approvals from different agencies of the City. In fact, LAMC Section 17.36 specifically sets forth procedures for projects which require multiple approvals, including an approval from the Advisory Agency. Accordingly, there are no grounds for appeal based on an unsupported allegation that consideration of the Vesting Tentative Map was improperly piecemealed from consideration of related approvals necessary for the Project.

VI. Conclusion

Therefore, based on substantial evidence, which the City has independently confirmed, the Project clearly meets or exceeds the criteria enumerated in PRC Section 21155.1. Moreover, Appellant has no right to appeal the actions of the City Council under PRC 21151(c). Respectfully, the appeal on the exemption should be denied. Additionally, the appeal fails to state any basis in fact or law that would invalidate the manner in which the Advisory Agency acted or its findings. Therefore, the appeal based on the actions of the Advisory Agency should be denied.

Sincerely,



Edgar Khalatian

Abundant Housing LA

March 7, 2019

Jason McCrea
City of Los Angeles
200 N Spring St, Room 721
Los Angeles, CA 90012
cpc@lacity.org

To whom it may concern,

We are writing to you in support of the proposed mixed-use development at 6400 Sunset Blvd, including 200 units of housing with 10 affordable units and 7,000 square feet of ground floor commercial space, CPC-2016-3630-ZC-HD-DB-MCUP-SPP-SPR-WDI and ENV-2016-3631-SCPE. We urge the city to grant a Waiver of Development Standard to permit compact parking spaces to meet 20% of the residential parking requirement. We also urge the city to grant a Zone and Height District Change to remove the "D" limitation on the site, and permit a FAR of 6:1.

The greater Los Angeles region is facing a severe housing shortage. This project will provide much needed housing. By creating new housing in this neighborhood, it will help to reduce issues of gentrification and displacement in other parts of the region. Abundant Housing LA believes that these housing challenges can only be addressed if everyone in the region does their part.

This project is in a great location for housing, with many public transportation options nearby. There is frequent Metro bus service within one and two blocks (Route 2 between UCLA and Downtown, Route 201 between Redondo Beach and Hollywood) as well as DASH Hollywood and DASH Beachwood. It is just over one-half mile from a Metro Red Line stop, which North Hollywood and Downtown. These transit options provide excellent access to colleges, hospitals, employment centers, museums, and entertainment venues. In addition, many desirable neighborhood amenities such as restaurants and retail are in easy walking and bicycling distance.

It is great to see the developer using the Density Bonus program to bring both market rate and badly needed affordable housing to the city, especially in a Transit Priority Area. Affordable housing programs that depend on a percentage of new construction being affordable need a lot of new construction to have an impact, and the city should work to increase the number of developers using the Density Bonus. This project is a good project for Los Angeles and for the region. Again, we urge the city to approve the approve the density bonus and find the project Categorically Exempt from the provisions of CEQA.

Best Regards,

The Abundant Housing LA Steering Committee:



Matt Dixon
620 W Wilson Ave, Unit H
Glendale 91203



Mark Vallianatos
3591 Canada St
Los Angeles 90065



Brent Gaisford
Downtown LA resident, CD 14
Los Angeles 90013



Leonora Camner
1013 16th St, Unit 102
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Mark Edwards
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March 11, 2019

City Planning Commission
City of Los Angeles
200 North Spring Street, Room 340
Los Angeles, CA 90012

Edgar Khalatian
Partner
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EKhalatian@mayerbrown.com

Re: 6400 Sunset Boulevard
Case No. CPC-2016-3630-ZC-HD-DB-MCUP-
SPP-SPR-WDI and VTT-74496-CN

Dear Members of the City Planning Commission:

On behalf of our client, 6400 Sunset, LLC (the “**Applicant**”), which proposes to redevelop the property located at 6400 Sunset Boulevard within the Hollywood Community Plan area, we respectfully request that the City Planning Commission consider and approve the proposed technical corrections and amendments to the Staff Report, including the draft conditions of approval, and the Exhibit A dated March 14, 2019.

We respectfully request the following modifications (additions are underlined and deletions are stricken through):

p. Q-1

2. Site Development. Except as modified herein, the project shall be in substantial conformance with the plans and materials stamped “Exhibit A” and dated March ~~14~~, 2019, and attached to the subject case file. No change to the plans will be made without prior review by the Department of City Planning, and written approval by the Director of Planning, with each change being identified and justified in writing. Minor deviations may be allowed in order to comply with provisions of the Municipal Code, the subject conditions, and the intent of the subject permit authorization.

p. C-1

A. Development Limitations:

2. Building Height. Building height shall be limited to a maximum height of 284 285 feet to the roof line and 290 feet (including parapet rooftop structures) consistent with Exhibit A.

City Planning Commission
March 11, 2019
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We are requesting that the March 14, 2019 Exhibit A be used because the March 1, 2019 Exhibit A incorrectly noted that the project would plant 93 trees; however, consistent with the City's Municipal Code, the project will plant 52 trees (the Code requires 50 trees). This has been corrected on Sheets L1.3, L2.3, and L3.3.

Thank you, and please let me know if you have any questions or would like to discuss.

Sincerely,



Edgar Khalatian
Partner

Abundant Housing LA

March 9, 2019

Monique Acosta, City Planning Associate
City of Los Angeles
200 N Spring St, Room 721
Los Angeles, CA 90012

To whom it may concern,

We are writing to you in support of the proposed 44-unit mixed-use development, including 44 affordable units and 7,500 square feet of commercial/retail at 100 S. Boyle Ave, CPC-2018-998-DB-CU and ENV-2018-999-EIR. We urge the city to approve the Density Bonus to allow a 10% increase in density utilizing two Off-Menu and one On-Menu Affordable Housing Incentives. The three requested incentives are a 2.72:1 FAR in lieu of the otherwise permitted 1.5:1 FAR, a 68-foot tall mixed-use building in lieu of a maximum 45-foot tall building allowed, and a 10-foot rear yard setback for the residential portions of the mixed-use building in lieu of a 17-foot rear yard setback.

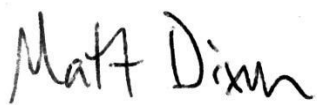
The greater Los Angeles region is facing a severe housing shortage. This project will provide much needed affordable housing. By creating new housing in this neighborhood, it will help to reduce issues of gentrification and displacement in other parts of the region. Abundant Housing LA believes that these housing challenges can only be addressed if everyone in the region does their part.

This project is in a great location for housing. There is a Metro Gold Line stop at its corner, which runs from East Los Angeles through Downtown LA to Azusa, and includes stops at museums, colleges, and entertainment centers such as Dodger Stadium and the Rose Bowl. There is frequent bus service at its corner and also a few blocks away (Route 30 between East Los Angeles and Route 106 between Beverly Hills and Boyle Heights and Monterey Park) with stops at USC, a middle school, a high school, and recreation centers. It is also less than .5 miles from an elementary school, hospital, and a recreation center. Many other desirable neighborhood amenities such as restaurants and retail are in easy walking and bicycling distance, and the project, along with the planned retail and restaurant on the project's ground floor.

It is great to see the developer using the Density Bonus program to bring badly needed affordable housing to the city. This project is a good project for Los Angeles and for the region. Again, we urge the city to approve the density bonus.

Best Regards,

The Abundant Housing LA Steering Committee:



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Chelsea Byers

March 11, 2019

John Coluccio
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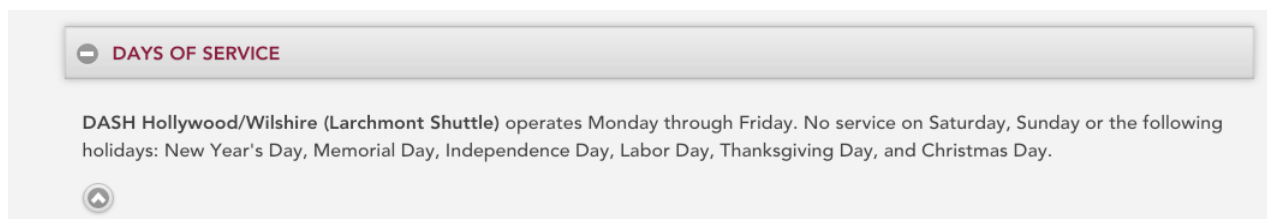
Appeal of Case No.: DIR-2018-0723-TOC; ENV-2018-0724-CE. 1130-1132 N. Beachwood Dr.

Please note the following objections to the Department of City Planning's Staff Appeal Recommendation Report for 1130-1132 N. Beachwood Dr. (item 12 on the Commission's agenda).

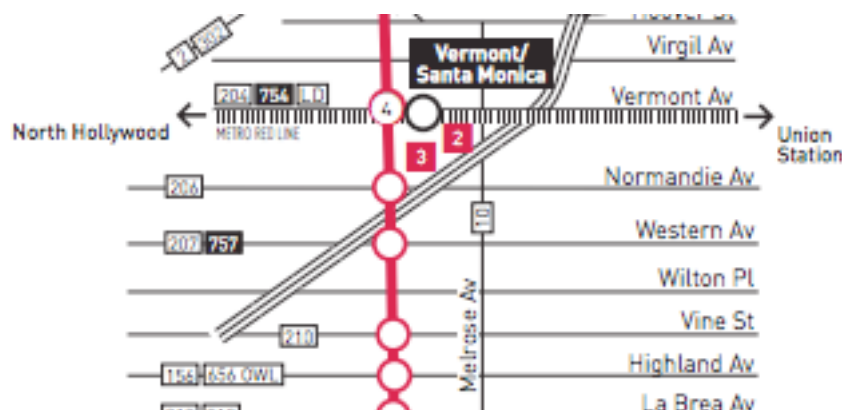
I. The project site does not qualify for a Tier 3 designation because it is not within 750 feet of the intersection of a regular bus and a rapid bus.

The Recommendation Report states at page A-7: *"The project qualifies for a Tier 3 TOC because it is located within 750 feet of the intersection of a regular bus and a rapid bus (DASH Hollywood/Wilshire and Rapid Line 704)." This statement is incorrect.*

1) **The DASH line is not a "regular bus;" it is a shuttle** that does not operate on weekends, has limited weekday hours, and has scheduled stops only every 25 minutes. Note below that the DASH service website refers to the line as the "Larchmont Shuttle."



2) **Rapid Line 704 does not stop at Gower St.**, where the DASH shuttle has a stop, but instead stops at Vine St., 1,848 feet from the project site. There is therefore no "intersection" of the two lines where passengers of the DASH shuttle can disembark and take the Rapid 704, or vice versa. Note map below of the Rapid 704 line showing that it does not stop between Western Ave. and Vine St.



Response to Staff Recommendation Report for 1130-1132 N. Beachwood Dr.
Page two

Note DASH Larchmont Shuttle schedule below, showing limited stops and hours:

DASH HOLLYWOOD/WILSHIRE SOUTHBOUND TO WILSHIRE BLVD					
	A Argyle Ave. & Hollywood Blvd.	B Gower St. & Santa Monica Blvd.	C Melrose Ave. & Windsor Blvd.	D Western Ave. & Beverly Blvd.	E Oxford Ave. & Wilshire Blvd.
A. M.	7:00	7:05	7:08	7:13	7:20
A. M.	7:25	7:30	7:33	7:38	7:45
A. M.	7:50	7:55	7:58	8:03	8:10
A. M.	8:15	8:20	8:23	8:28	8:35
A. M.	8:40	8:45	8:48	8:53	9:00
A. M.	9:05	9:10	9:13	9:18	9:25
A. M.	9:30	9:35	9:38	9:43	9:50
A. M.	9:55	10:00	10:03	10:08	10:15
A. M.	10:20	10:25	10:28	10:33	10:40
A. M.	10:45	10:50	10:53	10:58	11:05
A. M.	11:10	11:15	11:18	11:23	11:30
A. M.	11:35	11:40	11:43	11:48	11:55
P. M.	12:00	12:05	12:08	12:13	12:20
P. M.	12:25	12:30	12:33	12:38	12:45
P. M.	12:50	12:55	12:58	1:03	1:10
P. M.	1:15	1:20	1:23	1:28	1:35
P. M.	1:40	1:45	1:48	1:53	2:00
P. M.	2:05	2:10	2:13	2:18	2:25
P. M.	2:30	2:35	2:38	2:43	2:50

Note map below showing project site as located 0.35 miles (1,848 feet by airline) from the nearest Rapid Line bus stop – **over double the distance** allowed for a Tier 3 designation:

Distance from

Distance to

Measure Distance

1130 N. Beachwood

6301 Santa Monica Blvd

Please add the country code or name. Example: *Richmond, VA, US*

Distance in km

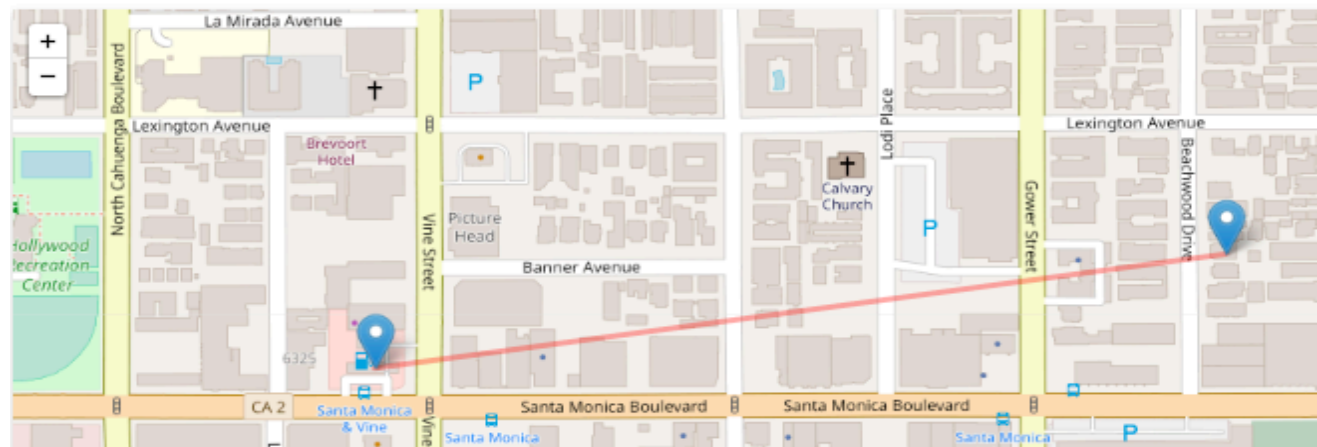
Distance in miles

Distance in nautical miles

0.57 km

0.35 miles

0.31 nmi



Response to Staff Recommendation Report for 1130-1132 N. Beachwood Dr.

Page three

Under the TOC Guidelines, the project **qualifies for a Tier 1 designation**, due to the fact that the closest intersection of a regular bus line and a Rapid bus line is at Vine St. and Santa Monica Blvd., 1,848 feet by airline from the project site.

Chart 1. TOC Affordable Housing Incentive Area Tiers

Type of Major Transit Stop	Tier 1 (Low)	Tier 2 (Medium)	Tier 3 (High)	Tier 4 (Regional)
	Distance to Major Transit Stop			
Two Regular Buses (intersection of 2 non Rapid Bus* lines, each w/ at least 15 min. average peak headways)	750 - 2640 ft.	< 750 ft.	-	-
Regular plus Rapid Bus* (intersection of a Regular Bus and Rapid Bus line)	1500 – 2640 ft.	750 – <1500 ft.	< 750 ft.	-

California Public Resources Code Section 21064.3 defines “Major Transit Stop” as “*two or more major bus routes with a frequency of service interval of 15 minutes or less...*” A DASH Shuttle does not qualify under this legal definition.

PUBLIC RESOURCES CODE - PRC

DIVISION 13. ENVIRONMENTAL QUALITY [21000 - 21189.57] (Division 13 added by Stats. 1970, Ch. 1433.)

CHAPTER 2.5. Definitions [21060 - 21074] (Chapter 2.5 added by Stats. 1972, Ch. 1154.)

21064.3. “Major transit stop” means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

(Added by Stats. 2002, Ch. 1039, Sec. 3. Effective January 1, 2003.)

Note further that DASH does not allow interdepartmental transfers, precluding any easy transfer between a Metro bus and a shuttle, even if the two lines were to have a common stop (which they do not).

II. The CRA/LA illegally issued a clearance for the project.

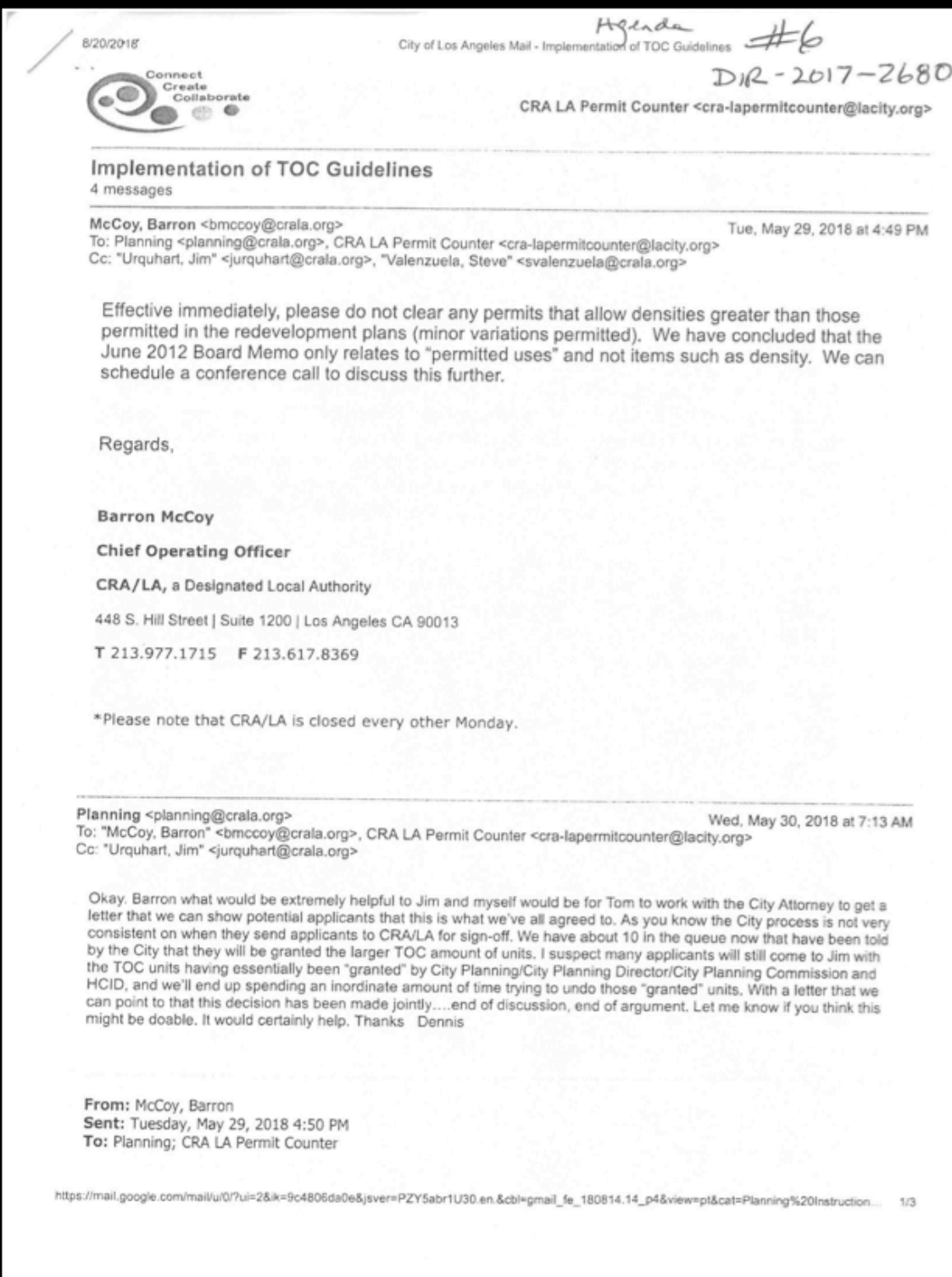
The Recommendation Report repeatedly states that on June 27, 2018, “*the project received CRA/LA clearances*” for the proposed project. Yet on this same day, the Community Redevelopment Agency posted on its website that the “**CRA/LA has determined that the density limits contained in the redevelopment plans are not superseded by measure JJJ and the implementing TOC Ordinance.**” The Hollywood Redevelopment Plan limits the site’s density to 8 units, not the 14 sought by the developer and approved by planning dept. staff.

The fact that a clearance was issued by the CRA planner for the Beachwood project on the same day that the CRA issued its determination that such projects are not permissible is a clear violation of policy.

Response to Staff Recommendation Report for 1130-1132 N. Beachwood Dr.

Page four

On May 29, 2018, almost a month prior to the CRA placing on its website that TOC projects are prohibited in the Redevelopment Plan Areas, CRA Chief Operating Officer Barron McCoy sent an email to Jim Urquhart and the CRA's Planning Counter, stating: **"Effective immediately, please do not clear any permits that allow densities greater than those permitted in the redevelopment plans."**



Response to Staff Recommendation Report for 1130-1132 N. Beachwood Dr.

Page five

Subsequently, the CRA posted the TOC prohibition on its website on June 27, as seen below:

 CRA/LA A DESIGNATED LOCAL AUTHORITY	DATE / June 27, 2018
448 S. Hill Street / Suite 1200 Los Angeles / California 90013	FILE CODE / T 213 977 1600 / F 213 977 1665 www.crafs.org

Transit Oriented Communities (TOC) Density Bonuses

Following passage of City Measure JJJ, the Los Angeles City Council adopted the TOC Ordinance which provides incentives to developers who construct housing in proximity to transportation infrastructure and systems. In some instances, the incentives provide for up to 80% density bonuses if affordable units are included in the project. While there are ongoing discussions with the Department of City Planning and the Office of City Attorney, CRA/LA has determined that the density limits contained in the redevelopment plans are not superseded by Measure JJJ and the implementing TOC Ordinance.

The density limitations affect potential development in six (6) redevelopment project areas: City Center, Central Industrial, Hollywood, North Hollywood, Wilshire Center/Koreatown, and Pacific Corridor. Please consult the appropriate redevelopment plan to determine if your proposed project may be impacted by the plan's limitations. The redevelopment plans are available on CRA/LA's website (www.crala.org) under the "Project Areas" tab.

CRA employee Jim Urquhart violated a clear directive from the CRA's Chief Operating Officer to not clear any further TOC approvals, including for the project. The fact that Urquhart issued the clearance on the same date that the CRA posted the TOC prohibition on its website belies the illegal nature of the approval.

1130 N BEACHWOOD DR Unit# 1-14 90038

Application / Permit	18010-20000-00929
Plan Check / Job No.	B18VN03539
Group	Building
Type	Bldg-New
Sub-Type	Apartment
Primary Use	(5) Apartment
Work Description	Proposed type III-A 14-unit 4-story apt bldg. over 1-level on-grade parking type 1-A garage/lobby. Transit Oriented Communities Affordable Housing Incentive Program (TOC) note: <2-units set-aside for extremely Low Income>
Permit Issued	No
Current Status	Verifications in Progress on 11/21/2018

Permit	Cleared	6/27/2018	ADRIAN SANCHEZ
Project located in CRA area	Cleared	6/27/2018	JIM URQUHART
Sewer availability	Cleared	6/27/2018	ADRIAN SANCHEZ

Response to Staff Recommendation Report for 1130-1132 N. Beachwood Dr.

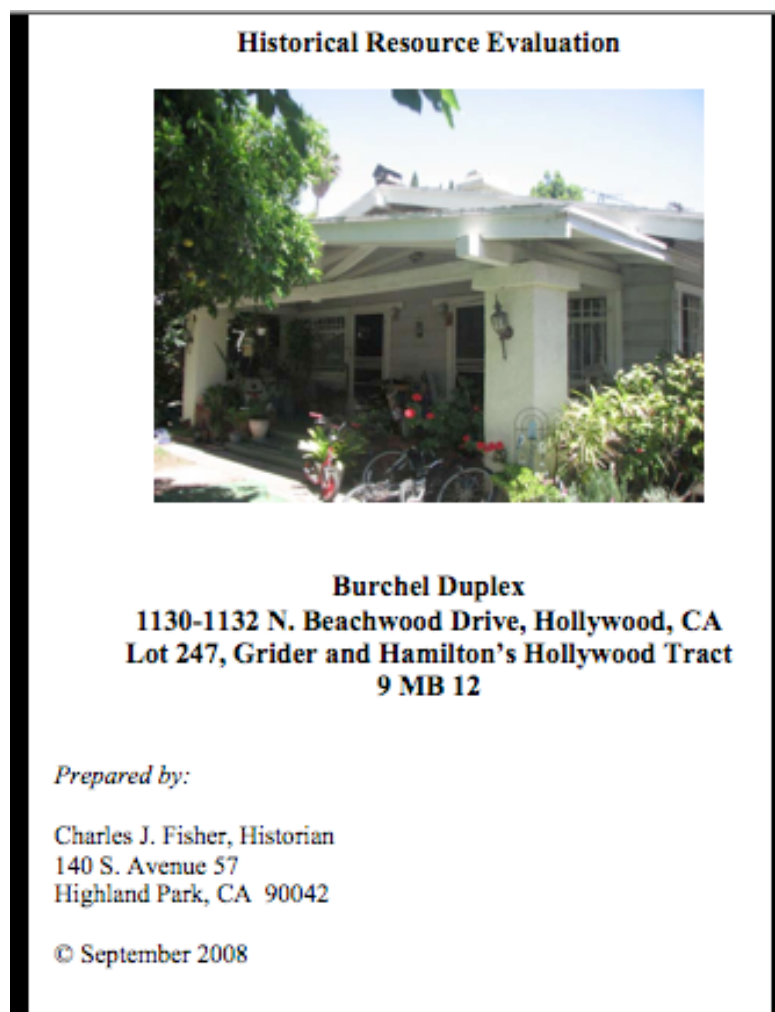
Page six

The density sought for the 1130 N. Beachwood Dr. TOC project is **not** consistent with the Hollywood Redevelopment Plan. The clearance issued for the project on June 27, 2018 by Jim Urquhart was in violation of a direct order to not do so from his superior, and is therefore null and void.

III. The 1916 Craftsman duplex is a potentially significant historic resource.

Staff states that 1) appellants have not presented any substantial evidence showing that the 1916 duplex on the project site qualifies as a historic resource; 2) that the duplex was not identified in Survey LA; and 3) that a Historic Resource Assessment conducted on behalf of the developer by SWCA Environmental Consultants determined that both the duplex and area are not historic. Staff further refers to a letter submitted to the CRA on April 25, 2018 from the preservation organization Hollywood Heritage, bemoaning the lack of a mechanism to prevent the duplex's demolition.

Staff has failed to perform its due diligence in researching the site. In 2008, Charles Fisher completed a historical resource evaluation concerning the significance of the 1916 duplex. His report was requested by the property owners, who had proposed a second-floor addition. The report submitted to the CRA concluded that the duplex *"does have enough of its original design to be potentially eligible for local Historic Cultural Monument listing as an architectural type specimen."*



Response to Staff Recommendation Report for 1130-1132 N. Beachwood Dr.

Page six

The Recommendation Report further fails to respond to the March 4, 2019 letter we submitted showing 20 TOC projects and other major development projects within the vicinity of the subject proposed project. The cumulative impacts associated with these proposed developments have not been assessed.

IV. The TOC Guidelines exceed the limited authority granted by Measure JJJ.

The TOC Guidelines approved by this commission exceed the authority of Measure JJJ. Note below that the language of Measure JJJ makes no mention of incentives for additional height or reduced open space. Instead, Measure JJJ -- as approved by the voters -- states that the Department of City Planning “*may allow adjustments to minimum square feet per dwelling unit, floor area ratio, or both, and may allow different levels of density increase depending on the Project’s base zone and density.*” Per the Los Angeles Municipal Code (LAMC), an “adjustment” is generally considered to be a change of 20% or less. In Specific Plan Areas, the LAMC limits adjustments to 10%.

(2) **TOC Incentives.** An Eligible Housing Development shall be granted TOC Incentives, as determined by the Department of City Planning consistent with the following:

(i) **Residential Density Increase.** An Eligible Housing Development shall be granted increased residential density at rates that shall meet or exceed a 35% increase. In establishing the density allowances, the Department of City Planning may allow adjustments to minimum square feet per dwelling unit, floor area ratio, or both, and may allow different levels of density increase depending on the Project’s base zone and density.

(ii) **Parking.** An Eligible Housing Development shall be granted parking reductions consistent with California Government Code Section 65915(p).

The language of Measure JJJ also precludes the dramatic parking decreases approved by this commission. Measure JJJ states: “*An Eligible Housing Development shall be granted parking reductions consistent with California Government Code Section 65915(p).*” Yet Govt. Code Section 65915(p) provides for a parking ratio far in excess of that allowed by the TOC Guidelines, with 1 parking stall for units of one bedroom or less; 2 parking stalls for units of two to three bedrooms; and 2 ½ stalls for larger units.

(p) (1) Upon the request of the developer, no city, county, or city and county shall require a vehicular parking ratio, inclusive of handicapped and guest parking, of a development meeting the criteria of subdivision (b), that exceeds the following ratios:

(A) Zero to one bedrooms: one onsite parking space.

(B) Two to three bedrooms: two onsite parking spaces.

(C) Four and more bedrooms: two and one-half parking spaces.

(2) If the total number of parking spaces required for a development is other than a whole number, the number shall be rounded up to the next whole number. For purposes of this subdivision, a development may provide “onsite parking” through tandem parking or uncovered parking, but not through onstreet parking.

V. TOC projects are accelerating the loss of rent stabilized housing and gentrification in Hollywood, and decreasing public transit use.

As noted in our March 4, 2019 letter to the commission, the project site's Census Tract 1909.02 has shown a significant decline in the percentage of minorities over the past 18 years. As development has driven out these and other city residents from RSO units, public transportation in Los Angeles County has significantly decreased. As noted by the LA Times in a March 4, 2019 article on proposed vehicle fees, LA's transit ridership has **plummeted 20% in the past five years**, "*driven by a shift to driving instead of using Metro's sprawling bus and rail network.*" The Times article explains that "*Metro's bus riders have a median household income of less than \$18,000, and 4 out of 5 passengers have no access to a car.*" Yet these transit dependent residents are the ones we see forced out by development, including TOC projects, replaced by Whites with higher incomes who, as the Times article explains, **favor Uber, Lyft, or driving their own cars.**



VI. The project cannot be approved and the appeal must be upheld.

As proposed, the 1130 N. Beachwood Dr. site is not qualified for a Tier 3 approval. The project's clearance by the CRA was improper, and is directly counter with their official policy. The 1916 Craftsman duplex on the project site is a potential historic resource, and its demolition must be assessed in relation to a cumulative loss of the area's eroding historic fabric. And the TOC Guidelines greatly exceed the authorization for land use change granted by the people to the city in their approval of Measure JJJ.

For the above reasons, we ask that this commission reject the 1130 Beachwood Dr. project. Thank you.

*Charles J. Fisher, Historian
140 S. Avenue 57
Highland Park, CA 90042
Phone: 323/256-3593 Fax: 323/255-0041
Email: arroyoseco@hotmail.com*

March 11, 2019

Los Angeles City Planning Commission
200 N. Spring Street, Room 340
Los Angeles, CA 90012

RE: 1130-32 N. Beachwood Drive, DIR-2018-0723-TOC-1A
ENV-2018-0724-CE

Dear Commissioners,

I am writing this letter to dispute the conclusions given on the existing 1916 duplex located at the above address. I am familiar with this property as I was asked to write a historic assessment report on it in 2008 by then owners, Santos and Dora H. Alvarenga, who were interested in adding a second story to the duplex. In the report, the resource was named as the “Burchel Duplex” in reference to Herman E. and Harriet A. Burchel, who owned the property from 1921 until 1949.

After a review of the architecture and history of the building and observing that it was virtually unchanged since its original construction, I determined that it had level 5 significance and proceeded to propose mitigation measures to ensure that any addition would meet the Secretary of the interior’s guidelines for additions and alterations.

The report was completed in September of 2008, but I do not know whether it was ever submitted to the planning department. The changes that were proposed at that time were never carried out and the duplex remains as it was eleven years ago.

As a professional historian, I have written numerous reports on buildings located inside and outside the City of Los Angeles. I have also written and submitted over 160 successful Historic Cultural Monument nominations and I have co-authored Historic Structure reports for Mills Act application in Los Angeles.

While I would like to re-submit the earlier report in its entirety, the 10 page limitation for this appeal process precludes that. Therefore, I am attaching several pages of the earlier report in order to illustrate the conditions at the time.

As this duplex is completely intact, it should be properly reviewed and called out for potential mitigation and alternatives over its destruction, just as mitigations were proposed for the changes that were planned in 2008.

Sincerely yours,

A handwritten signature in blue ink that reads "Charles J. Fisher". The signature is written in a cursive style with a large, stylized 'C' and 'F'.

Charles J. Fisher,
Historian

Historical Resource Evaluation



Burchel Duplex
1130-1132 N. Beachwood Drive, Hollywood, CA
Lot 247, Grider and Hamilton's Hollywood Tract
9 MB 12

Prepared by:

Charles J. Fisher, Historian
140 S. Avenue 57
Highland Park, CA 90042

© September 2008

Section V

Architectural Significance

The duplex located at 1130-32 N. Beachwood Drive displays character-defining features of the Craftsman style, which flourished in the United States from about 1905 to 1930. The structure is virtually unaltered since its construction, with some minor changes to the front porch, such as minor brickwork and lights that have been added to the front porch columns. It is possible that the later fixtures replaced earlier ones, but that is not confirmed. No early photos of the structure have been found.

The Craftsman style is native to Southern California, finding its beginnings along the banks of the Arroyo Seco in Pasadena, South Pasadena and the Highland Park community of Los Angeles. Early designs were done by architects, such as Green and Green, Train and Williams, Sumner P. Hunt and Norman Foote Marsh, however, the style soon caught on as an alternative to the machine made detailing that was found in the earlier Victorian styles. The simple features of the design were a direct link to the philosophy of William Morris and furniture of Gustav Stickley and was popularized by publications such as Craftsman Magazine.

The style quickly found adherents throughout the United States and along with it's cousin, the Prairie Style of the American Midwest and the earlier California Mission Revival, became readily available through plan books along with numerous architects and contractors. It was a structure that could easily be constructed by one with good carpentry skills.

The Burchel Duplex is a symmetrical structure that adheres strictly to the Craftsman essentials. Even though it was built as a rental property, it displays a level of craftsmanship that is distinctive.

Because the immediate neighborhood has undergone changes, the unaltered state of the Buchel Duplex leaves it as a good example and reminder of the quality of construction that appears to have been the norm in the area at the time it was built.

As there is no architect of record, it is possible that the design was taken from one of a number of plan books that proliferated during the early 20th Century. On the other hand, the contractor may have designed the building from scratch before he built it. Design-build contractors were not that uncommon at the time.

Either way, the structure remains a good representation of its time and place and clearly displays its Craftsman design and is a solid representative of the style.

A number of the 932 Los Angeles Historic Cultural Monuments are in the Craftsman Style, ranging from large residential buildings to small cottages, as well as some institutional buildings, such as the Eagle Rock 20th Century Woman's Club (HCM 537).

The garage/storage building is not original to the site and does not have any value for the study of architectural design of the period of significance (1916-1949), nor does it display any unique significance for the 1970s, when it was constructed.

Section VI

Historical Significance

The entire history of the Burchel Duplex appears to be that of rental housing until 1991, when the current owners acquired the site. Research of the various owners has been problematic as much of their data has not been found through an extensive search of their history in census records, death indexes and newspaper files, mostly from the Los Angeles Times.

None of the owners of record appear to have had any major significance in national, state or local history. No research was done on the renters to see if any of them may have had any significance either at the time of residence or during a different period of their lives.

However, the architectural integrity of the structure is high due to lack of changes, possibly because of its long-term use as a rental. On the other hand, it appears to have also benefited from a high level of sustained maintenance.

The structures high degree of original integrity makes it a good representation of its time and place. It is particularly of interest as an example of early 20th Century Craftsman rental housing.

*Section X
Photographs*



Burchel Duplex, 1130-32 N. Beachwood Drive, May 11, 2007 (Charles J. Fisher photo)



Burchel Duplex, front porch gable, 1130-32 N. Beachwood Drive, May 11, 2007 (Charles J. Fisher photo)



Burchel Duplex, side view of front porch, 1130-32 N. Beachwood Drive, May 11, 2007 (Charles J. Fisher photo)



Burchel Duplex, chimney, 1130-32 N. Beachwood Drive, May 11, 2007 (Charles J. Fisher photo)



Burchel Duplex, living room windows, 1130-32 N. Beachwood Drive, May 11, 2007 (Charles J. Fisher photo)



Burchel Duplex, rear facade, 1130-32 N. Beachwood Drive, May 11, 2007 (Charles J. Fisher photo)

ERVIN COHEN & JESSUP^{LLP}

9401 Wilshire Blvd., 9th Floor
 Beverly Hills, CA 90212-2974
 ethompson@ecjlaw.com
 PH: 310.281.6356
 FX: 310.859.2325
 File 16663.1

March 11, 2019

VIA E-MAIL

Ms. Samantha Millman, President
 Mr. Vahid Khorsand, Vice President
 Mr. David Ambroz, Commissioner
 Ms. Caroline Choe, Commissioner
 Ms. Karen E. Mack, Commissioner
 Mr. Marc Mitchell, Commissioner
 Ms. Veronica Padilla, Commissioner
 Mr. Dana M. Perlman, Commissioner

City Planning Commission, City of Los Angeles
 c/o JoJo Pewsawang, City Planner
 Department of City Planning
 200 North Spring Street, Room 525
 Los Angeles, CA 90012

Re: **Case No. DIR-2018-0723-TOC (1130-1132 N. Beachwood Drive, Los Angeles CA 90068)**

Dear Honorable Commissioners:

As you know, we represent SN Hollywood, LLC ("Owner") and its application for DIR-2018-0723-TOC, a proposed multi-family Transit Oriented Communities ("TOC") Affordable Housing Incentive Program project at 1130-1132 N. Beachwood Drive (the "Project"). This will serve as our response to documentation filed by the appellant of the Project, John Coluccio (the "Appellant") dated March 1, 2019 ("Appellant Correspondence").

It should be noted that neither of the two issues stated in the appeal were even identified, let alone supported, by the Appellant Correspondence. Instead, the entire 19 pages covers a wide variety of complaints ranging from alleged cumulative impacts of TOC projects as well as by-right projects throughout Hollywood, to frustration with movie nights at the Hollywood Forever Cemetery and the negative aspects of gentrification in certain areas of Hollywood. We only focused on the issue of alleged cumulative impacts and whether the City properly analyzed potential impacts as that is the only issue relevant to the Project.

The Appellant Correspondence calls out twenty (20) alleged TOC projects that are stated to be located within one square mile of the Project. (Given time constraints, we were unable to independently

verify the actual distances from the Project – although it should be noted the map on page two of the Appellant Correspondence shows the Project located at the farthest western area of the map and more than half of the projects listed are located on the other side of the 101 Freeway, quite a large distance away to be linked to the Project in a cumulative project study.) Analyzing the listed 20 projects we determined the following:

- Of the 20 listed projects, 19 of the properties are zoned R3 or R4/C2 with one property zoned RD 1.5. Therefore the number of allowed units based on the existing underlying zoning is 609 units.
- Properties #10 and #19 on the list are NOT relevant TOC projects in that these projects are not requesting any additional incentives beyond those allowed by-right under the TOC regulations and thus, do not require discretionary approvals– which is why the Appellant did not do a summary of these two cases. These two projects account for 246 units out of the 1,003 “Proposed” units. Since they are ministerial, Section 21080 of the Public Resources Code specifically states that no CEQA analysis is required. These two projects should not have been included on this list.
- Property #11 was not an administrative TOC project. It was a project permit compliance review for a 39-unit project located within the Vermont/Western Station Neighborhood Area (“SNAP”). The TOC request was ministerial as it did not include any additional incentives, and as stated above, no CEQA analysis is required for the ministerial portion of this project. Therefore this project should not have been included on the list.

After omitting properties 10, 11, and 19 from the list, the number of proposed units decreases by 278 units to 725 proposed units. The number of units allowed by-right under the existing zoning is 608 units. This leaves an overall increase of roughly 117 units that require discretionary approvals in the Appellant Correspondence.

Additional Facts:

- Nearly every project that shows “None” as the existing number of units is a commercially-zoned property with a commercial building on it that will either be demolished or has already been demolished. If a traffic analysis is required for any of these properties, a trip credit for the previous/existing commercial use will be factored into the analysis.
- Property 8 is a 100% affordable project that will create 60 new Very-Low Income affordable units.

City Planning Commission
March 11, 2019
Page 3

ERVIN COHEN & JESSUP LLP

- The total number of **affordable units** that will be created by these 20 projects is at least 148 units – nearly all of these units will be designated for either Extremely Low or Very Low Income households.

Finally, of the 17 remaining discretionary TOC projects, 12 projects filed an Environmental Assessment Form ("EAF") that compels the City Planning Department to thoroughly review the proposed project to determine whether there are any potential impacts associated with the project, and if so, specific environmental reports are required, depending on the particular issue. Given the fact that all but roughly 117 units of the proposed 1,003 units identified in the Appellant Correspondence are allowed based on the underlying zoning, Appellant's argument that the TOC is resulting in unidentified cumulative impacts is unfounded.

In the case of our client's Project, the Applicant filed an EAF and City Planning requested an Air Quality report to determine whether there are any impacts associated with the Project with respect to grading, construction and operational impacts as well as an Historic Resources Assessment to determine whether the existing structure met any of the criteria necessary to determine eligibility for historic status. The reports were submitted and no impacts were found. Given that the base density on the property is nine units and the Project would only add five additional units, no traffic report or study was required. After a thorough vetting and review of all documentation, finding no impacts – cumulative or otherwise, the City Planning Department issued a Categorical Exemption for this Project. The Appellant has failed to demonstrate that the Project would result in potentially significant impacts. Summarily, we request that you deny this appeal.

Thank you for your attention to this letter.

Sincerely,

Ellia Thompson

Abundant Housing LA

March 9, 2019

Jason McCrea
City of Los Angeles
200 N Spring St, Room 721
Los Angeles, CA 90012
cpc@lacity.org

To whom it may concern,

We are writing to you in support of the proposed project at 5058 West Maplewood, including 13 units of housing and one affordable unit, DIR-2017-2437-DB-1A and ENV-2017-2438-CE. We urge the city to approve the Density Bonus to allow a 35% increase in density utilizing two On-Menu Affordable Housing Incentives. The two requested incentives are a side yard setback of 6 feet 5 inches in lieu of the otherwise required 8 feet, and an 11-foot increase in building height to permit 56 feet in lieu of the otherwise permitted 45 feet.

The greater Los Angeles region is facing a severe housing shortage. This project will provide much needed housing. By creating new housing in this neighborhood, it will help to reduce issues of gentrification and displacement in other parts of the region. Abundant Housing LA believes that these housing challenges can only be addressed if everyone in the region does their part.

This project is in a great location for housing, with many public transportation options nearby. There is frequent Metro bus service within two blocks (Route 207 between Los Feliz and Hawthorne) as well as DASH Hollywood. Route 207 connects with four different Metro line stations and the project is 1.5 miles from a Metro Red Line stop, which runs between North Hollywood and Downtown. These transit options provide excellent access to colleges, hospitals, employment centers, museums, and entertainment venues. In addition, many desirable neighborhood amenities such as restaurants and retail are in easy walking and bicycling distance, and the project includes 15 bicycle parking spaces.

It is great to see the developer using the Density Bonus program to bring both market rate and badly needed affordable housing to the city, especially in a Transit Priority Area. Affordable housing programs that depend on a percentage of new construction being affordable need a lot of new construction to have an impact, and the city should work to increase the number of developers using the Density Bonus. This project is a good project for Los Angeles and for the region. Again, we urge the city to approve the density bonus and find the project Categorically Exempt from the provisions of CEQA.

Best Regards,

The Abundant Housing LA Steering Committee:



Matt Dixon
620 W Wilson Ave, Unit H
Glendale 91203



Mark Vallianatos
3591 Canada St
Los Angeles 90065



Brent Gaisford
Downtown LA resident, CD 14
Los Angeles 90013



Leonora Camner
1013 16th St, Unit 102
Santa Monica 90403



Mark Edwards
1174 N Curson Ave, #8
West Hollywood 90046

Gabe Rose



Chelsea Byers

**Arch Inc.**

Architecture Planning Landscape

Page | 1

**5058 W Maplewood Ave
Los Angeles, CA 90004**

03/08/2019

City Planning Commission

After surveyor visited the job site and made a measurement of the building height for the adjacent building located at "5050 Maplewood Ave." (The adjacent building on East) the sheets on the attached exhibit A and B have been revised to show the building height that is 48'-0" from highest point to the driveway, as measured by surveyor.

Exhibit C shows the Planning approval letter and the permit application for the property located at "501-543 N. Wilton Pl., at North-West corner of Maplewood Ave. and Wilton place, and located at opposite corner from our project. The distance of this property to our project is around 100'-0". The reason of submitting that document is to show a project with using density Bonus and affordable housing incentives next to our project. This project is using the Height incensement from 45 feet to 56 feet, same as our project.

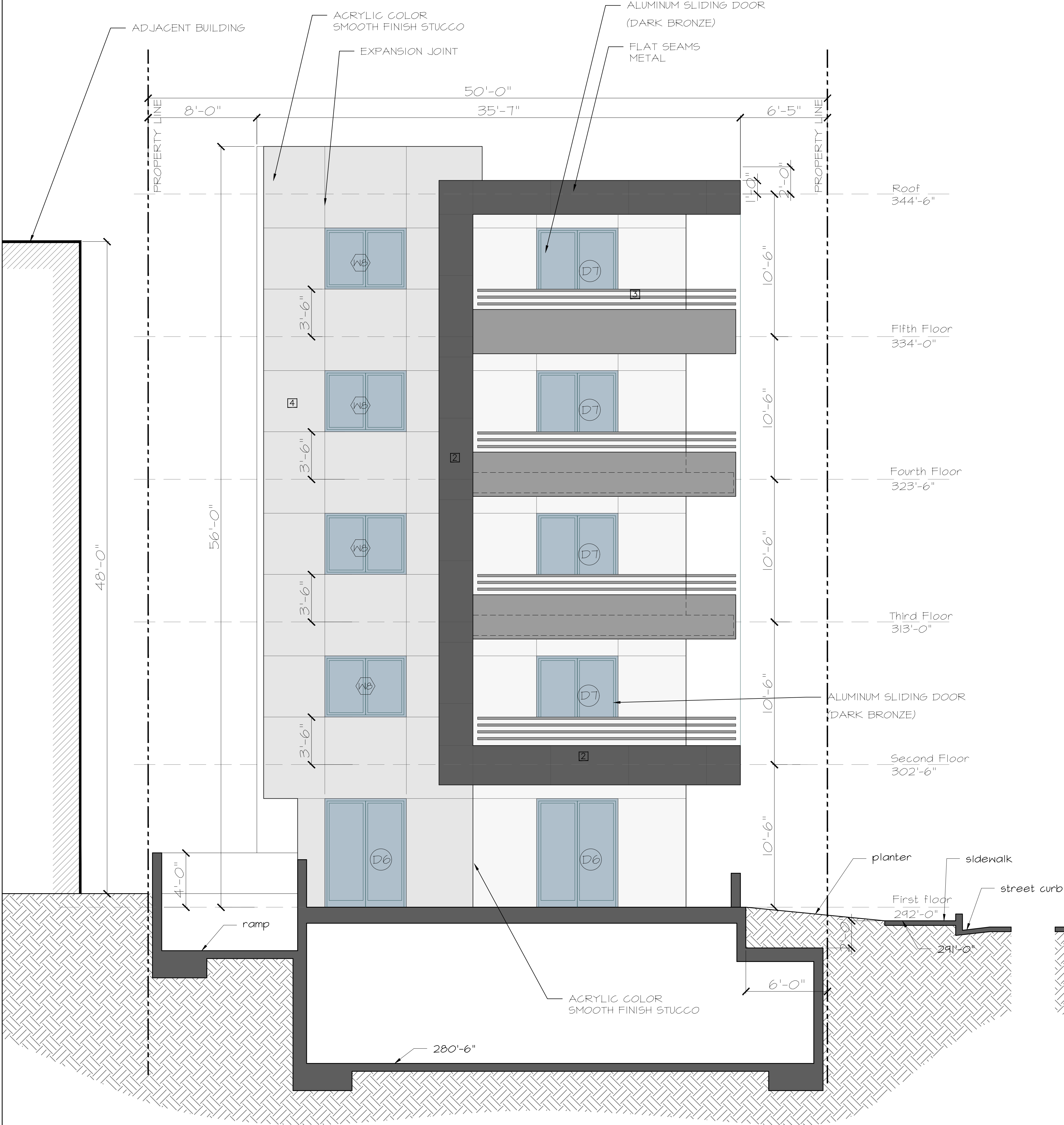
This approval letter and the permit application show the 5 story building in the neighborhood and very close to our project.

In comparison between this project and our project, this project have 5th floor completely occupied by units, but at our project, only one half of the 5th floor has occupied by a unit. The rest of the 5th floor is greenery and using as open space.

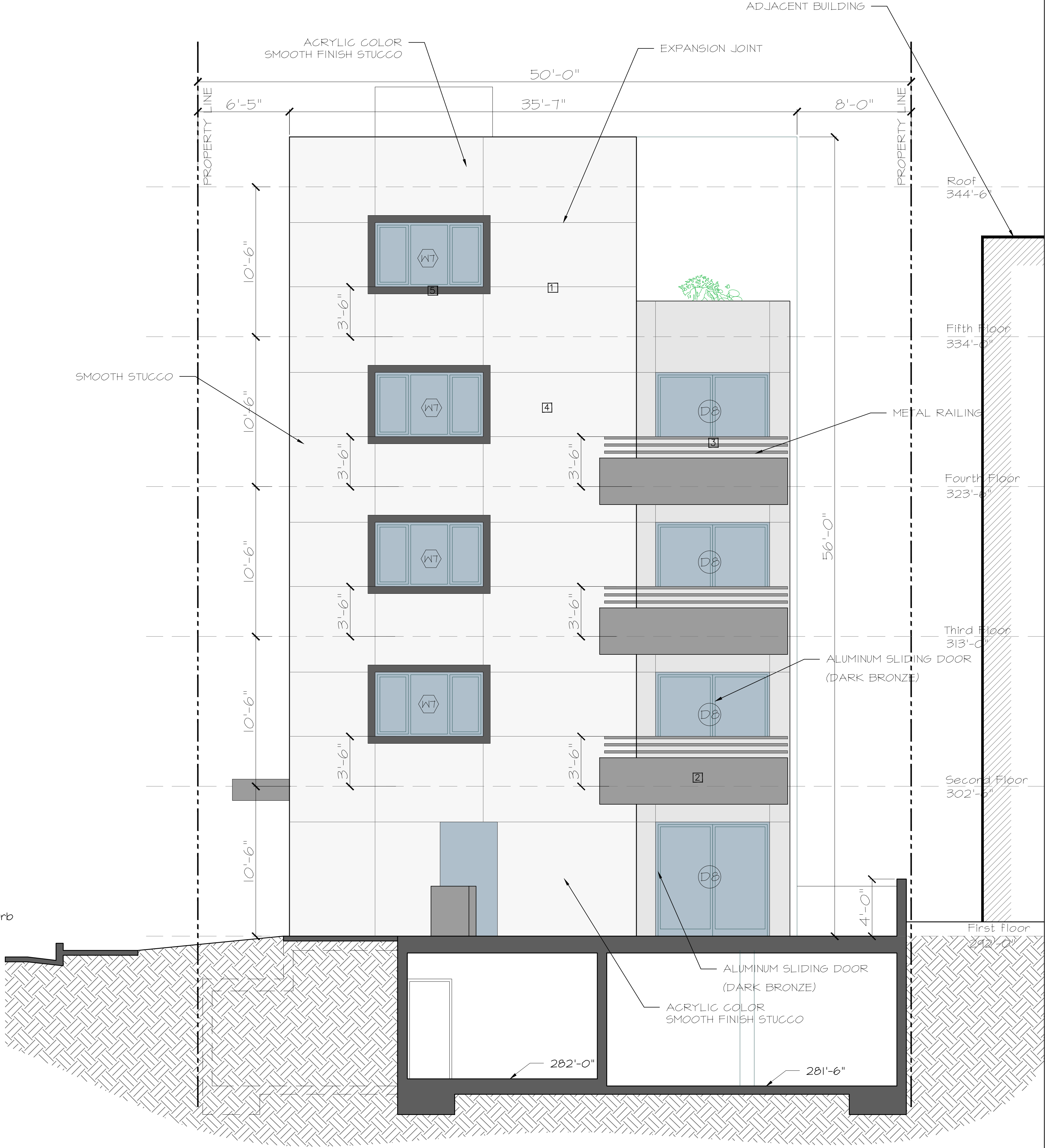
Thank you for your consideration,

Hamid Dehghan,
Architect, AIA, NCARB

EXHIBIT A



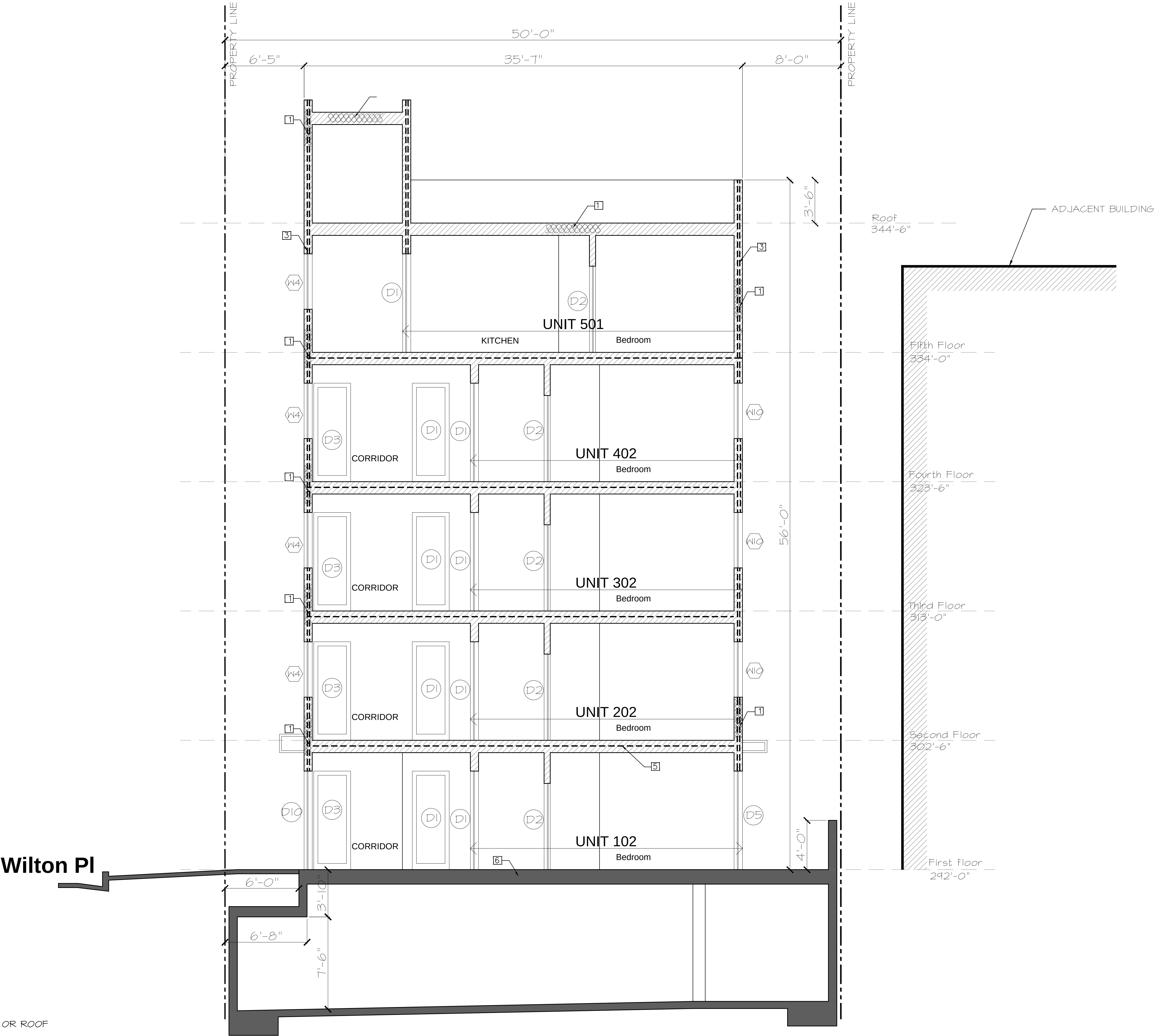
NORTH ELEVATION
VIEW FROM MAPLEWOOD AVE.



SOUTH ELEVATION
VIEW FROM REAR YARD

- EXPANSION JOINT
- ▣ FLAT SEAM METAL BALCONY, CANOPY, BORDER
- ▣ METAL RAILING
- ▣ SMOOTH FINISH STUCCO
- ▣ SMOOTH FINISH STUCCO 2
- ▣ METAL LOUVER
- ▣ WOOD SIDING

EXHIBIT B



- KEY NOTE:
- 1 PROVIDE MIN. INSULATION OF: R-15 IN EXTERIOR WALLS AND R-30 IN CEILINGS OR ROOF
 - 2 42" HIGH GUARD RAIL
 - 3 TWO-HOUR WALL . SEE DETAIL #3/A6.I
 - 4 ONE-HOUR WALL BETWEEN UNITS AND CORRIDOR. SEE DETAIL #2/A2.I
 - 5 STC 50 / ONE-HOUR WALL / FLOOR / CEILING BETWEEN UNITS. SEE DETAIL #1/A6.I
 - 6 CONCRETE SLAB AS PER STRUCTURAL
 - 7 TYP. 1 HOUR FIRE RATED EXTERIOR WALL #2/A2.I
 - 8 3 HOUR FIRE WALL #6/A2.I

SECTION B

**DEPARTMENT OF
CITY PLANNING**

CITY PLANNING COMMISSION

DAVID H. J. AMBROZ
PRESIDENT

RENEE DAKE WILSON
VICE-PRESIDENT

ROBERT L. AHN
CAROLINE CHOE
RICHARD KATZ
JOHN W. MACK
SAMANTHA MILLMAN
VERONICA PADILLA
DANA M. PERLMAN

JAMES K. WILLIAMS
COMMISSION EXECUTIVE ASSISTANT II
(213) 978-1300

**CITY OF LOS ANGELES
CALIFORNIA**



ERIC GARCETTI
MAYOR

EXECUTIVE OFFICES
200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801

VINCENT P. BERTONI, AICP
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LISA M. WEBBER, AICP
DEPUTY DIRECTOR
(213) 978-1274

JAN ZATORSKI
DEPUTY DIRECTOR
(213) 978-1273

FAX: (213) 978-1275

INFORMATION
<http://planning.lacity.org>

**DENSITY BONUS & AFFORDABLE HOUSING INCENTIVES &
SITE PLAN REVIEW**

May 12, 2016

Applicant/Owner

James M. Frost
FCE Wilton, LLC
7551 W. Sunset Boulevard,
Suite 203
Los Angeles, CA 90046

Representative

John Reed
Reed Architectural Group,
Inc.
657 Rose Avenue
Venice, CA 90291

Case No. DIR-2015-0688-DB-SPR

CEQA: ENV-2015-0689-MND

Location: 501 – 543 N. Wilton Place

Council District: 4 – Ryu

Neighborhood Council: Greater Wilshire

Community Plan Area: Wilshire

Land Use Designation: Medium Residential

Zone: R3-1

Legal Description: Lots: 1 – 7, 1-3; Blocks:
None; Tract: TR 2938, TR
3536

Last Day to File an Appeal: May 27, 2016

DETERMINATION

Pursuant to the Los Angeles Municipal Code (LAMC) Section 12.22 A.25 and Section 16.05, as the designee of the Director of Planning, I hereby:

Approve a Density Bonus Compliance Review to allow the construction of a 5-story, 56-foot tall residential building totaling 101,957 square feet with 88 dwelling units. The Project will reserve a minimum of 12 percent, or eight (8) dwelling units, of the 65 total base dwelling units permitted on the site for Very Low Income tenant/owners for a period of 55 years. The following Density Bonus Incentive is approved:

Height. An increase in allowable maximum height from 45 feet to 56 feet.

Approve a Site Plan Review for the construction of an approximately 101,957 square foot development containing 88 units of housing in a 56-foot tall, 5-story building; and

Adopt Mitigated Negative Declaration ENV-2015-0689-MND, and the corresponding Mitigation Monitoring Program (MMP) as the Project's environmental clearance pursuant to the California Environmental Quality Act and Section 21082.1(c)(3) of the California Public Resources Code.

Adopt the attached Findings.

CONDITIONS OF APPROVAL**EXHIBIT C**

1. **Site Development.** Except as modified herein, the Project shall be in substantial conformance with the plans and materials submitted by the Applicant, stamped "Exhibit A," and attached to the subject case file. No change to the plans will be made without prior review by the Department of City Planning, Central Project Planning Division, and written approval by the Director of Planning. Each change shall be identified and justified in writing. Minor deviations may be allowed in order to comply with the provisions of the Los Angeles Municipal Code or the project conditions.
2. **Residential Density.** The Project shall be limited to a maximum density of 88 residential units including Density Bonus Units.
3. **Affordable Units.** A minimum of eight (8) units, that is 12 percent of the base dwelling units, shall be reserved as affordable units, as defined by the State Density Bonus Law 65915 (C)(2).
4. **Changes in Restricted Units.** Deviations that increase the number of restricted affordable units or that change the composition of units or change parking numbers shall be consistent with LAMC Section 12.22 A.25 (9a-d).
5. **Housing Requirements.** Prior to issuance of a building permit, the owner shall execute a covenant to the satisfaction of the Los Angeles Housing and Community Investment Department (HCIDLA) to make a minimum of eight (8) units available to Very Low Income Households, for sale or rental as determined to be affordable to such households by HCIDLA for a period of 55 years. Enforcement of the terms of said covenant shall be the responsibility of HCIDLA. The Applicant will present a copy of the recorded covenant to the Department of City Planning for inclusion in this file. The Project shall comply with any monitoring requirements established by HCIDLA. Refer to the Density Bonus Legislation Background section of this determination.
6. **Height.** The requested incentive allows for a 35 percent increase of the height limit with a maximum of 11 additional feet or one additional story, whichever is lower. The Project is limited to a maximum of 56 feet in lieu of 45 feet.
7. **Automobile Parking.** Vehicle parking shall be provided consistent with LAMC 12.22 A.25, Parking Option 1, which permits one on-site parking space for each residential unit with one or fewer bedrooms; two on-site parking spaces for each residential unit with two to three bedrooms; and two-and-one-half on-site parking spaces for each residential unit with four or more bedrooms. Based upon the number and type of dwelling units proposed, a minimum of 151 automobile parking spaces shall be provided. However, the Project proposes 165 vehicle parking spaces.
8. **Adjustment of Parking.** In the event that the number of Restricted Affordable Units should increase, or the composition of such units should change (i.e. the number of bedrooms, or the number of units made available to Senior Citizens and/or Disabled Persons), or the Applicant selects another Parking Option (including Bicycle Parking Ordinance) and no other Condition of Approval or incentive is affected, then no modification of this determination shall be necessary, and the number of parking spaces shall be re-calculated by the Department of Building and Safety based upon the ratios set forth above.
9. **Bicycle Parking.** Bicycle parking shall be provided consistent with LAMC 12.21 A.16. Long-term bicycle parking shall be provided at a rate of one per dwelling unit or guest room. Additionally, short-term bicycle parking shall be provided at a rate of one per ten

525 N Wilton Pl 1-88



Permit #:
Plan Check #: B16LA16743
Event Code:

16010 - 10000 - 04960

Printed: 11/07/17 12:23 PM

Bldg-New GREEN - MANDATORY

City of Los Angeles - Department of Building and Safety

Issued on: 11/07/2017

Apartment

APPLICATION FOR BUILDING PERMIT

Last Status: Issued

Regular Plan Check

AND CERTIFICATE OF OCCUPANCY

Status Date: 11/07/2017

1. TRACT	BLOCK	LOT(s)	ARB	COUNTY MAP REF #	PARCEL ID # (PIN #)	2. ASSESSOR PARCEL #
TR 2938		1		M B 29-90	141B189 679	5522 - 015 - 020
TR 2938		2	1	M B 29-90	141B189 702	5522 - 015 - 020
TR 2938		2	2	M B 29-90	141B189 710	5522 - 015 - 021
TR 2938		3	2	M B 29-90	141B189 713	5522 - 015 - 021
TR 2938		3	1	M B 29-90	141B189 733	5522 - 015 - 022
TR 2938		4	1	M B 29-90	141B189 736	5522 - 015 - 022

3. PARCEL INFORMATION

Area Planning Commission - Central
LADBS Branch Office - LA
Council District - 4

Census Tract - 1924.10
District Map - 141B189
Energy Zone - 9
Near Source Zone Distance - 2.8
Thomas Brothers Map Grid - 593-G7

Certified Neighborhood Council - Greater Wilshire
Community Plan Area - Wilshire

ZONES(S): R3-I

4. DOCUMENTS

ZI - ZI-2452 Transit Priority Area in the Cit
DTRM - DIR-2015-688-DB-SPR

5. CHECKLIST ITEMS

Special Inspect - Anchor Bolts
Special Inspect - Concrete > 2.5ksi
Special Inspect - Field Welding

Special Inspect - Fire Proofing
Special Inspect - Masonry
Special Inspect - Shotcrete

Special Inspect - Structural Observation
Special Inspect - Structural Wood (periodic)
Fabricator Req'd - Shop Welds

6. PROPERTY OWNER, TENANT, APPLICANT INFORMATION

Owner(s):
FCE WILTON LLC
7551 SUNSET BLVD STE 203, LOS ANGELES CA 90046 --
Tenant:

Applicant: (Relationship: Owner-Bldr)
FCE WILTON LLC -
7551 W SUNSET BLVD SUITE 203, LOS ANGELES, CA-- (323) 883-1800

For Cashier's Use Only

W/O #: 61004960

7. EXISTING USE

PROPOSED USE

(05) Apartment
(07) Garage - Private

8. DESCRIPTION OF WORK

NEW 5-STORY, 88-UNIT APARTMENT (80 MARKET RATE UNITS AND 8 RESIDENTIAL UNITS DESIGNATED FOR VERY LOW INCOME PER DIR-2015-0688-DB-SPR)

9. # Bldgs on Site & Use: 1 OF 3; TV = \$16,115,639

10. APPLICATION PROCESSING INFORMATION

BLDG. PC By: Sai Khum DAS PC By: Shine Lin
OK for Cashier: Michael Irigoyen Coord. OK:

Signature: Date: 11/07/2017

11. PROJECT VALUATION

Final Fee Period

Permit Valuation: \$16,115,639 PC Valuation:

Sewer Cap ID: Total Bond(s) Due:

12. ATTACHMENTS

Owner-Builder Declaration
Plot Plan

For inspection requests, call toll-free (888) LA4BUILD (524-2845). Outside LA County, call (213) 482-0000 or request inspections via www.ladbs.org. To speak to a Call Center agent, call 311. Outside LA County, call (213) 473-3231.

LA DAVI 104120596 11/7/2017 12:23:31 PM

BUILDING PERMIT COMM	\$62,077.05
BUILDING PLAN CHECK	\$0.00
PLAN MAINTENANCE	\$300.00
EI RESIDENTIAL	\$4,512.38
DEV SERV CENTER SURCH	\$2,006.68
SYSTEMS DEVT FEE	\$4,013.37
CITY PLANNING SURCH	\$3,742.62
MISCELLANEOUS	\$10.00
PLANNING GEN PLAN MAINT SURCH	\$4,366.39
SCHOOL DEV RES	\$565,520.88
DWELLING UNIT	\$17,600.00
RES DEVT TAX	\$26,400.00
CA BLDG STD COMMISSION SURCHARGE	\$645.00
BUILDING PLAN CHECK	\$0.00

Sub Total: \$691,194.37

Permit #: 160101000004960
Building Card #: 2017LA92576
Receipt #: 0104812018



* P 1 6 0 1 0 1 0 0 0 0 4 9 6 0 F N *

13. STRUCTURE INVENTORY

(Note: Numeric measurement data in the format "number / number" implies "change in numeric value / total resulting numeric value")

16010 - 10000 - 04960

(P) Basement (BC): +1 Levels / 1 Levels	(P) Dwelling Unit: +88 Units / 88 Units	(P) B Occ. Load: +4 Max Occ. / 4 Max Occ.
(P) Basement (ZC): +1 Levels / 1 Levels	(P) Very Low Income Dwelling Units: +8 Units / 8 Units	(P) R2 Occ. Load: +515 Max Occ. / 515 Max Occ.
(P) Floor Area (ZC): +101957 Sqft / 101957 Sqft	(P) NFPA-13 Fire Sprinklers Thru-out	(P) S2 Occ. Load: +239 Max Occ. / 239 Max Occ.
(P) Height (BC): +53.23 Feet / 53.23 Feet	(P) Concrete Shearwall	(P) Long Term Bicycle Parking Provided for Bldg: +88 Spaces
(P) Height (ZC): +56 Feet / 56 Feet	(P) Wood (Plywood, OSB, etc.) Shearwall	(P) Long Term Bicycle Parking Req'd for Bldg: +88 Spaces / 8
(P) Landscape Area: +11792 Sqft / 11792 Sqft	(P) A3 Occ. Group: +2151.89 Sqft / 2151.89 Sqft	(P) Parking Req'd for Bldg (Auto+Bicycle): +248 Stalls / 248
(P) Length: +404.9 Feet / 404.9 Feet	(P) B Occ. Group: +303.6 Sqft / 303.6 Sqft	(P) Provided Compact for Bldg: +74 Stalls / 74 Stalls
(P) Stories: +5 Stories / 5 Stories	(P) R2 Occ. Group: +102830 Sqft / 102830 Sqft	(P) Provided Disabled for Bldg: +4 Stalls / 4 Stalls
(P) Width: +97.75 Feet / 97.75 Feet	(P) S2 Occ. Group: +47704 Sqft / 47704 Sqft	(P) Provided Standard for Bldg: +87 Stalls / 87 Stalls
(P) Density Bonus Units: +23 Units / 23 Units	(P) A3 Occ. Load: +107 Max Occ. / 107 Max Occ.	(P) Short Term Bicycle Parking Provided for Bldg: +9 Spaces

14. APPLICATION COMMENTS:

** Approved Seismic Gas Shut-Off Valve may be required. ** 30-day notice 70151730-0001-3644-5166 7006-2760-0003-3257-1034

In the event that any box (i.e. 1-16) is filled to capacity, it is possible that additional information has been captured electronically and could not be printed due to space restrictions. Nevertheless the information printed exceeds that required by section 19825 of the Health and Safety Code of the State of California.

15. BUILDING RELOCATED FROM:**16. CONTRACTOR, ARCHITECT & ENGINEER NAME****ADDRESS****CLASS****LICENSE #****PHONE #**

(A) REED, JOHN G	657 ROSE AVENUE,	VENICE, CA 90291	C14523	
(E) DEJBAN, MASOUD	17200 VENTURA BLVD STE 213A,	ENCINO, CA 91316	S2521	(818) 784-5571
(E) IRVINE, JON ALAN	145 N SIERRA MADRE BLVD,	PASADENA, CA 91107	GE2891	(626) 844-6641
(E) WILSON, ELDRIDGE WARREN	4042 SUNKIST ST,	PALMDALE, CA 93551	L3450	
(O) OWNER-BUILDER			0	

PERMIT EXPIRATION/REFUNDS: This permit expires two years after the date of the permit issuance. This permit will also expire if no construction work is performed for a continuous period of 180 days (Sec. 98.0602 LAMC). Claims for refund of fees paid must be filed within one year from the date of expiration for permits granted by LADBS (Sec. 22.12 & 22.13 LAMC). The permittee may be entitled to reimbursement of permit fees if the Department fails to conduct an inspection within 60 days of receiving a request for final inspection (HS 17951).

17. OWNER-BUILDER DECLARATION

I hereby affirm under penalty of perjury that I am exempt from the Contractors' State License Law for the following reason (Section 7031.5, Business and Professions Code; Any city or county which requires a permit to construct, alter, improve, demolish, or repair any structure, prior to its issuance, also requires the applicant for such permit to file a signed statement that he or she is licensed pursuant to the provisions of the Contractors License Law (Chapter 9 (commencing with Section 7000) of Division 3 of the Business and Professions Code) or that he or she is exempt therefrom and the basis for the alleged exemption. Any violation of Section 7031.5 by any applicant for a permit subjects the applicant to a civil penalty of not more than five hundred dollars (\$500).):

☐ I, as the owner of the property, or my employees with wages as their sole compensation, will do the work, and the structure is not intended or offered for sale (Sec. 7044, Business and Professions Code; The Contractors License Law does not apply to an owner of property who builds or improves thereon, and who does such work himself or herself or through his or her own employees, provided that such improvements are not intended or offered for sale. If, however, the building or improvement is sold within one year from completion, the owner-builder will have the burden of proving that he or she did not build or improve for the purpose of sale).

OR

☒ I, as the owner of the property, am exclusively contracting with licensed contractors to construct the project (Sec. 7044, Business and Professions Code; The Contractors License Law does not apply to an owner of property who builds or improves thereon, and who contracts for such projects with a contractor(s) licensed pursuant to the Contractors License Law.)

18. WORKERS' COMPENSATION DECLARATION

I hereby affirm, under penalty of perjury, one of the following declarations:

☐ I have and will maintain a certificate of consent to self insure for workers' compensation, as provided for by Section 3700 of the Labor Code, for the performance of the work for which this permit is issued.

☐ I have and will maintain workers' compensation insurance, as required by Section 3700 of the Labor Code, for the performance of the work for which this permit is issued. My workers' compensation insurance carrier and policy number are:

Carrier: _____ Policy Number: _____

☒ I certify that in the performance of the work for which this permit is issued, I shall not employ any person in any manner so as to become subject to the workers' compensation laws of California, and agree that if I should become subject to the workers' compensation provisions of Section 3700 of the Labor Code, I shall forthwith comply with those provisions.

WARNING: FAILURE TO SECURE WORKERS' COMPENSATION COVERAGE IS UNLAWFUL, AND SHALL SUBJECT AN EMPLOYER TO CRIMINAL PENALTIES AND CIVIL FINES UP TO ONE HUNDRED THOUSAND DOLLARS (\$100,000), IN ADDITION TO THE COST OF COMPENSATION, DAMAGES AS PROVIDED FOR IN SECTION 3706 OF THE LABOR CODE, INTEREST, AND ATTORNEY'S FEES.

19. ASBESTOS REMOVAL DECLARATION / LEAD HAZARD WARNING

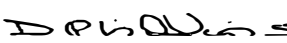
I certify that notification of asbestos removal is either not applicable or has been submitted to the AQMD or EPA as per section 19827.5 of the Health and Safety Code. Information is available at (909) 396-2336 and the notification form at www.aqmd.gov. Lead safe construction practices are required when doing repairs that disturb paint in pre-1978 buildings due to the presence of lead per section 6716 and 6717 of the Labor Code. Information is available at Health Services for LA County at (800) 524-5323 or the State of California at (800) 597-5323 or www.dhs.ca.gov/childlead.

20. FINAL DECLARATION

I certify that I have read this application INCLUDING THE ABOVE DECLARATIONS and state that the above information: INCLUDING THE ABOVE DECLARATIONS is correct. I agree to comply with all city and county ordinances and state laws relating to building construction, and hereby authorize representatives of this city to enter upon the above-mentioned property for inspection purposes. I realize that this permit is an application for inspection and that it does not approve or authorize the work specified herein, and it does not authorize or permit any violation or failure to comply with any applicable law. Furthermore, neither the City of Los Angeles nor any board, department officer, or employee thereof, make any warranty, nor shall be responsible for the performance or results of any work described herein, nor the condition of the property nor the soil upon which such work is performed. I further affirm under penalty of perjury, that the proposed work will not destroy or unreasonably interfere with any access or utility easement belonging to others and located on my property, but in the event such work does destroy or unreasonably interfere with such easement, a substitute easement(s) satisfactory to the holder(s) of the easement will be provided (Sec. 91.0106.4.3.4 LAMC).

By signing below, I certify that:

- (1) I accept all the declarations above namely the Owner-Builder Declaration, Workers' Compensation Declaration, Asbestos Removal Declaration / Lead Hazard Warning, and Final Declaration; and
- (2) This permit is being obtained with the consent of the legal owner of the property.

Print Name: **DIANNE MAEX PHILLIPS**Sign: Date: **11/07/2017**
☒ Owner
 ☐ Authorized Agent