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SECONDARY SUBMISSIONS

**Department of City Planning**

City Hall, 200 N. Spring Street, Room 525, Los Angeles, CA 90012

September 20, 2022

TO: South Valley Area Planning Commission

FROM: Jivar Afshar, Planning Assistant

TECHNICAL MODIFICATION TO THE APPEAL RECOMMENDATION REPORT FOR CASE NO. ZA-2007-1255-ZAD-1A; 22241-22255 WEST MULHOLLAND DRIVE

The following technical modifications/corrections need to be incorporated into the Appeal Recommendation Report dated September 22, 2022 to be considered at the South Valley Area Planning Commission meeting of September 22, 2022 related to Item No. 7 on the meeting agenda. Since the preparation of the Appeal Recommendation Report, the Applicant for the project has provided updated grading plans and grading quantities based on more recent data and refinements to the prior plans, as documented in the attached Exhibit 3, Forma Engineering Letter, September 14, 2022. The updated grading plans reduce the total amount of soil import required for the project, thus also resulting in fewer haul truck trips during project construction. However, the plans also increase the volume of grading on the site, due to needed overexcavation and recompaction of soils. The site has been previously disturbed and contains a considerable amount of previous fill that requires recompaction and additional soils in order to make the site more geologically stable.

These grading plan refinements would not result in changes to the less-than-significant project impacts related to air quality and greenhouse gas (GHG) effects analyzed in the project's Environmental Impact Report and as most recently updated in the August 2020 Erratum (Erratum No. 2), as noted in the attached Exhibit 4, Applicant Representative (DLA Piper) Letter, September 17, 2022. The reduction in soil import and haul truck trips reduces the Project's off-site mobile source air quality emissions and, therefore, the associated GHG emissions, during construction. Although the grading refinements increase the grading amounts for overexcavation and recompaction on the site, this would not change the length of the construction period, or the construction equipment mix, and thus do not alter the analysis of the environmental effects of the Project's construction in the EIR. The EIR's analysis is not based on the volume of dirt moved around the Project site, but rather on the maximum daily emissions from the heavy equipment used for grading and construction, using conservative assumptions about daily equipment operations. As the maximum daily emissions would not change with the grading plan refinement, therefore, the revised grading plan would still fall within the scope of impacts related to air quality and GHG emission analysis as analyzed in the EIR.

The overall grading boundary would not change and would not result in changes to less-than-significant project impacts related to biological resources analyzed in the project's EIR. In addition, the related Mitigation Measures will continue to be in place and will require the hand digging of all trenching under a tree's dripline, ensure that the trees be maintained in good health through construction and operation of the Project, ensure protection of the canopy and trunk of the tree, and ensure the maintenance of healthy soil conditions during construction. Therefore, the revised grading plan would still fall within the scope of impacts related to biological analysis analyzed in the EIR.

Deleted text is shown in ~~strikethrough~~ and added text is shown in underline.

Table of Contents, Addition of Exhibit 3 and Exhibit 4 Letters (Note: These new exhibits are attached at the end of the Technical Modification).

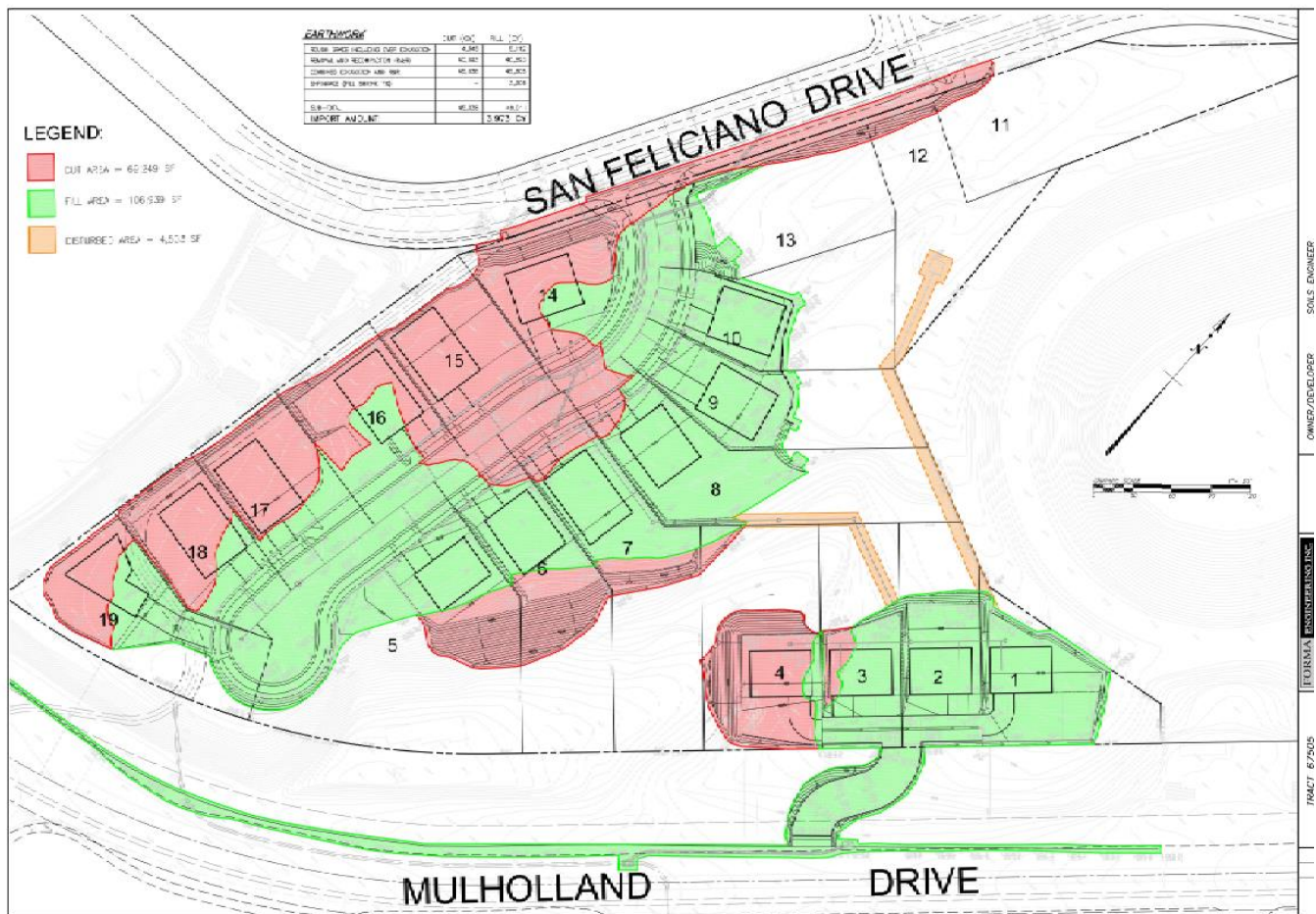
Exhibit 3 - Forma Engineering Letter, September 14, 2022

Exhibit 4 - Applicant Representative (DLA Piper) Letter, September 17, 2022

First page, Project Description subheader, revise the following grading, fill, and over-excavation/recompaction quantities:

The Project includes demolition and removal of one existing vacant single-family residence with its associated structures, grading of the site including ~~3,400~~ 4,345 cubic yards (c.y.) of cut and 5,112 ~~7,200~~ c.y. of fill, and 40,693 ~~26,800~~ c.y. of overexcavation/recompaction of soil, and the removal of 33 (12 protected) trees.

Page A-11, Replace Diagram 2 – Site Layout and Cut and Fill with the following figure:



Page A-12, Staff Responses to Appeal Point 2-1, revise the following grading quantities, over-excavation/recompaction quantities, and shrinkage percentage:

In addition, the site design has already been configured to minimize grading by locating access drives and building pads within the flatter portions of the site, as shown in the diagrams above. Grading for the Project would involve the excavation (cut) of approximately 4,345 ~~3,400~~ cubic yards. All excavated material would be used as fill on the Project Site. The proposed grading would require approximately 5,112 ~~7,400~~ cubic yards of fill to balance the site. It should be noted that the site has been previously disturbed and contains a considerable amount of previous fill that requires recompaction and additional soils in order to make the site more geologically stable. The over-excavation and compaction would require 40,693 ~~26,800~~ cubic yards of soil with estimated 7 ~~12~~% shrinkage and cut amount which is equal to 3,206 ~~3,600~~ cubic yards of soil, resulting in proposed import of 3,973 ~~7,400~~ cubic yards (amount of import equals amount of fill plus shrink minus cut) of material (See ~~Erratum No. 1~~ Technical Modification, dated September 20, 2022).

Page A-12, Staff Responses to Appeal Point 2-2, revise the following over-excavation/recompaction and grading quantities, and shrinkage percentage:

Development of the Project would require grading of the site, including over-excavation and compaction of 40,693 ~~26,800~~ cubic yards of soil with estimated 7 ~~12~~ percent shrinkage, and cut amount which is equal to 4,345 ~~3,600~~ cubic yards of soil, resulting in proposed import of 3,973 ~~7,400~~ cubic yards (amount of import equals amount of fill plus shrink minus cut) of material (See ~~Erratum No. 1~~ Appendix D, Technical Modification, dated September 20, 2022)



September 14, 2022

Via email

Jivar Afshar
Major Projects
Los Angeles City Planning
221 N Figueroa St., Room 1350
Los Angeles, CA 90012
Email: jivar.afshar@lacity.org

Re: Revised Grading Plans for 22241-22255 Mulholland Drive
ZA-2007-1255-1A

Dear Jivar:

We are writing to some minor updates to the previous grading exhibit submitted to the City of Los Angeles for the 22241-22255 Mulholland Drive project. The prior grading exhibit submitted to the City from Psomas Engineers showed the following grading numbers, which ended up with 7,400 cubic yards (cy) of soil that would have to be imported for project grading:

EARTHWORK GRADING SUMMARY:

EARTHWORK -	
CUT =	3,400 CY ±
FILL =	7,200 CY ±
OVER-EX (R&R) =	26,800 CY ±
OVER-EX AND CUT SHRINKAGE (12%) =	3,600 CY ±
IMPORT =	7,400 CY ±

The revised grading plans submitted to Planning include the following earthwork volumes:

EARTHWORK

	CUT (CY)	FILL (CY)
ROUGH GRADE INCLUDING OVER EXCAVATION	4,345	5,112
REMOVAL AND RECOMPACTION (R&R)	40,693	40,693
COMBINED EXCAVATION AND R&R	45,038	45,805
SHRINKAGE (FILL SHRINK 7%)	-	3,206
SUB-TOTAL	45,038	49,011
IMPORT AMOUNT:		3,973 CY

Accordingly, the revised plans for the project, which are based on more recent data and refinements to the prior plans, reduce the total amount of soil import required for the project. Because the project now proposes less total soil import than was proposed and analyzed previously for the project, fewer haul truck trips would be required for project construction.

We understand that the prior California Environmental Quality Act (CEQA) addendum for the project analyzed 7,400 cy of total hauling for import over an 88-day proposed earthwork period for construction. With 10 cy dump trucks, the project was analyzed to average approximately 18 total haul trips per day. With 3,973 cy of total import under the revised plan, the average number of trips over the same proposed 88-day period would be approximately 10 trips per day, which would reasonably be expected to reduce environmental impacts related to haul trips due to there being fewer trips.

Please let us know if you have any questions.

Sincerely,

FORMA ENGINEERING INC.

mike white

Mike White, PE
Principal

cc. Milena Zasadzien (milena.zasadzien@lacity.org)



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September 17, 2022
VIA EMAIL

Jivar Afshar
Major Projects
Los Angeles City Planning
221 N. Figueroa Street, Room 1350
Los Angeles, CA 90012
Email: jivar.afshar@lacity.org

**Re: Revised Grading Plans for 22241-22255 Mulholland Drive
ZA-2007-1255-1A**

Dear Jivar,

This letter supplements the letter dated September 14, 2022 by project civil engineer Forma Engineering (Forma) regarding minor updates to the previous grading exhibit submitted to the City of Los Angeles for the 22241-22255 Mulholland Drive subdivision project (Project).

These updates, which: (1) substantially reduce the volume of soil import and therefore the number of haul trucks required for Project construction, and (2) slightly increase the volume of grading, would not result in changes to the air quality and greenhouse gas (GHG) effects analyzed in the project's EIR, as most recently updated in the August 2020 Errata (Errata).

The 3,973 cubic yards of total import under the revised grading plan is only slightly more than the 3,200 cubic yards of import originally analyzed in the EIR. (See Errata, section 2.14.) Additionally, as stated in Forma's September 14, 2022 letter, the Project's construction grading, as revised, would require only 10 haul truck trips per day over the same 88-day period analyzed in the EIR, as compared to the 18 haul truck trips per day analyzed in the Errata. This reduction in haul truck trips reduces the Project's off-site mobile source air quality emissions and, therefore, the associated GHG emissions, during construction.

The slight increase in total grading volumes would also not increase air quality or GHG impacts during construction. The mitigation measures and regulatory compliance measures adopted for the increased soil import analyzed in the Errata would still be implemented even though the soil import has decreased. Further, the only measures specifically directed to soils are the SCAQMD Rule 403 dust control measures that every construction site is required to implement.

The minor changes to the proposed grading do not change the length of the construction period, or the construction equipment mix and thus do not alter the analysis of the environmental effects of the Project's construction in the EIR. That EIR analysis is not based on the volume of dirt moved around the Project site but on the heavy equipment used for construction using conservative assumptions about daily equipment operations.

Therefore, the project's air quality and GHG construction impacts would remain less than significant, as analyzed in the project's EIR and the Errata, and the volume of grading under the revised grading plan



September 17, 2022

Page Two

would remain well under the Mulholland Scenic Parkway Specific Plan Inner Corridor grading limit of 67,396 cubic yards for the Project. (See Errata, Section 2.5.)

Please let us know if you have any questions.

Thank you.

Best regards,

A handwritten signature in blue ink, appearing to be 'AB' followed by a stylized flourish.

Andrew Brady

AB:

cc. Milena Zasadzien milena.zasadzien@lacity.org
Kathleen King kathleen.king@lacity.org



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[#ZA-2019-7257-ELD-SPR-CDO-HCA](#)
6616 N. Reseda Blvd.

The Reseda Neighborhood Council does not support the project as presented at 6616 N. Reseda Blvd (#ZA-2019-7257-ELD-SPR-CDO-HCA). We do not find that this project is in substantial compliance with the community plan particularly with regards to streetscaping improvements.

The Reseda Neighborhood Council objects to the zero foot setback along Reseda Boulevard from the required 10 foot setback. We have a strong desire for a green belt and canopy trees along this portion of Reseda Boulevard. A zero foot setback would impede the placement of a greenbelt and the growth of shade trees. We also desire dedicated trash receptacles along Reseda and Kittridge as Reseda is chronically short of trash cans. We would like the owner/operator to have permanent responsibility for those trash receptacles and obtain the necessary permits.

In addition, the Reseda Neighborhood Council has concerns regarding the loading/unloading zone on Kittridge and the impact on street safety and traffic. We object to any loading or unloading along Reseda Boulevard due to Reseda Boulevard's status as a high injury network street. Reseda Boulevard has been a particularly deadly street for pedestrian and cyclist death and maiming.

The Reseda Neighborhood Council is concerned regarding adequate parking or parking solutions, such as a leasing agreement with neighboring properties for off-site parking, in particular during high volume times for visiting such as holidays.

If the project does go forward, we would like to see criteria for the selection of an operator. We desire information around low income unit availability.

We have concerns that the applicant did not seek letters of support prior to this neighborhood

council meeting from any community members or neighbors, or from the Council District 4 office.

Sincerely,
Reseda Neighborhood Council

The vote took place in a Brown Act compliant meeting on September 19, 2022. The vote was 7 yes, 1 abstain, 1 recused.



Howard Robinson & Associates

South Valley Area Planning Commission
c/o Alice Inawat, Commission Executive Assistant
200 N. Spring St., Room 272
Los Angeles, CA 90012

Sept. 16, 2022

Re: Case No. AA-2019-1556-PMLA-1A
15102, 15106 W. Haynes St., 15105 W. Hamlin St.
Request for Continuance

Dear Honorable Commissioners,

As representative for the Applicant and Appellant in this case, I am requesting a continuance of this matter to a date certain of October 13, 2022. This request will allow for more time for the Appellant, Applicant, and City Planning and Bureau of Engineering to achieve a compromise solution on this project.

Sincerely,

Susan Steinberg

Susan Steinberg

DAY OF HEARING SUBMISSIONS