

JOHN E. GLASGOW

June 16, 2013

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Re. Application for Coastal Development Permit
ENV-2012-131-MND (revised) dated June 17, 2013, Case No. ZA-2012-130-CDP
Project at 16990 - 17000 Sunset Blvd., Pacific Palisades, CA 90272

To Zoning Administrator and Darlene Navarrete:

The Proposed Mitigated Negative Declaration (MND) referenced above does not inadequately address nor mitigate the significant impacts associated with the partial list below. Having reviewed the many technical documents associated with the subject property, including two independent geological reports, there is overwhelming evidence that demands a Focused EIR be prepared for this project.

The Focused EIR should address the following issues:

1. Geology and soils (including the presence of sub-surface hydrogen sulfide gas)
2. Haul routes
3. Storm drain and sewer
4. Traffic ingress and egress
5. Potential removal of 3 Torrey Pine Trees
6. Cumulative impacts
7. [Q] Conditions setbacks (and height limits)
8. Location of the project on a bluff
9. Sunset Boulevard view corridor
10. Inadequate visual representation of the project for the community

1. Geology and soils.

The geology and soils issues for this project has generated a large amount of documentation, both from previous independent geologists and from two recently hired geologists retained by property owners adjacent to the subject property. The two geologists are GeoConcepts, Inc. and Ralph Stone & Company, Inc., other commentors have attached their findings. Other commentors have adequately responded to these issues, so I won't expand on them here, however, one issue that needs to be resolved is that the geologist for the development, Sassan Geosciences, Inc., has not acknowledged or identified mitigation measures to address the presence of hydrogen sulfide gas on the site.

Please see comments by Jack Allen and Amy Lundberg for a full discourse on this issue.

2. Haul routes.

Using approximately 2,785 truck trips, the applicant proposes to remove at least 44,000 cu. yds. of earth from the site. The movement of this amount of soil will have an enormous impact on the nearby community and traffic on Sunset Blvd., in addition to the implications of staging these trucks for use. The MND does not address the impact of this issue. The staging of trucks in nearby neighborhoods would be wholly unacceptable. A Focused EIR would solve these "haul route" issues.

3. Storm drain and sewer issues.

The applicant has not adequately addressed the issue of storm drains and sewer issues. Please see comments by Jack Allen and Amy Lundberg for a full discourse on this issue.

4. Traffic ingress and egress. (All references to Sunset Blvd. are east / west)

This project is located just east of a dangerous curve known locally as "dead man's curve". Traffic traveling east on Sunset Blvd. comes out of this curve at a high rate of speed as it encounters the ingress / egress from the subject property and the signal light at Marquez Ave. / Marquez Place. There have been many traffic accidents between this curve and the traffic light, the latest on a Thursday night, June 13, 2013 involving 3 teenage boys. Their car came to rest directly across from the proposed ingress / egress for this project. Further, there have been discussions to have traffic bollards placed in the street in front of the proposed ingress / egress to prevent left turns out to the west and left turns in when traveling west. If left turns out of the proposed development are prohibited, this will cause all tenant's cars to turn right in an easterly direction, some of which will need to make a u-turn at the intersection to go west, an inconvenience at the very least, but certainly a traffic jam at the light. The City of Los Angeles has redesigned and is presently seeking funding for re-construction of the intersection of Sunset Blvd. and Marquez Ave. to accommodate a safer bus turn-around, further complicating an easy u-turn for tenants who want to do so. Conversely, for tenants traveling westbound who are prohibited from making a left turn into the proposed development, they will have to travel past the turn-in on Sunset to Palisades Drive, turn right and travel up to the entrance of the nearby shopping center and make a u-turn, travel back to the light at Sunset Blvd., make a left turn and travel east back up the hill to enter the subject property, an intolerable inconvenience for any tenant. This will alter traffic patterns at the subject site and at Sunset Blvd. and Palisades Drive that have not been analyzed.

5. Potential removal of 3 Torrey Pine Trees.

Local Landscape Architect David Card has written extensively about the rare Torrey Pine trees planted along the right-of-way of 16990 - 17000 Sunset Blvd. (and 17030 Sunset Blvd.). Please review his complete package dated April 23, 2013 that he sent to the Planning Department. These Torrey Pine trees are important to the community and frame the scenic vistas to the ocean for those looking south down Marquez Ave. across the subject property.

6. Cumulative impacts.

This revised MND does not take into account the cumulative impacts of a proposed development at 17030 Sunset Blvd., 258 feet (less than a football field) to the west of the subject property. Even though the applicant for 17030 Sunset recently lost to an appeal for his Coastal Development Permit (CDP), because of his considerable investment over many years, it is considered likely that this project will come back in the planning process long before 16990 - 17000 Sunset is approved. It is for this reason that there could be cumulative impacts in the following areas:

1. Geological & soil
2. Haul routes
3. Traffic Ingress & Egress along Sunset Blvd.
4. Storm drains and sewer access
5. View corridors
6. Torrey Pines (loss of visual continuity if chain of trees are broken)

7. [Q] Conditions for rear setback issue.

The [Q] Conditions with respect to setbacks for the subject property are:

“[Q] Qualified Permanent Conditions of Approval (Nov. 14, 1995)

SEC. 2. B. Setbacks:

For any building or structure which is within 50 feet of a lot zoned R1 or more restrictive, the exterior wall of any second story shall be set back 10 feet horizontally from the exterior wall of the first story facing the lot zoned R1 or more restrictive.”

The drawing package submitted to the Department of Planning for the applicant’s Coastal Development Permit shows that the floor plan drawings for the first floor (A2.03) AND second floor (A2.04) are set back just beyond the dashed 20’-0” setback line on the south side of the property “*which is within 50 feet of a lot zoned R1 or more restrictive*” (RE40). The face of these two floors are in the same vertical plane, which violates the required second story setback of “*10 feet horizontally from the exterior wall of the first story*”. Although not documented here, this condition for this property was verified with the Planning desk at Building & Safety in West L.A. See attached drawings.

The applicant should provide an architectural north-south section of the project at the rear of the building showing the first and second floors as they dimensionally relate to the property line, the 50’-0” demarcation line and the property line for the adjacent RE40 zoned property to the south.

8. Location of the project on a bluff.

The subject site sits atop a coastal bluff, therefore there needs to be proper verification confirming that the project site is within a “Coastal Bluff” as defined in the Coastal Act. Once proper verification has occurred, the project can be analyzed with respect to the Coastal Commission’s Regional Interpretive Guidelines concerning its location on or near coastal bluffs.

9. Sunset Boulevard view corridor.

Sunset Boulevard is designated as a Scenic Major Highway Class II with a dedicated width of 100’-0”.

The Coastal Act, Chapter 3.e, New Development, Section 30251 provides that:

“The scenic and visual qualities of the coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of landforms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas.”

The property frontage along Sunset Blvd. for the subject property is 234'-0" with a building width of approximately 182'-0", therefore, the building frontage mass represents 78% of the property width. The only view corridor from Sunset Blvd. is the 36'-0" wide ingress and egress driveway on the west side of the proposed building, however, there is now an existing view corridor across the subject property from cars traveling south down Marquez Ave. toward Sunset approximately 200'-0" to the east of the proposed driveway. This existing Marquez view corridor will be completely blocked by the construction of the applicant's building because of its relationship to a three-story apartment building on the adjacent property to the east.

10. Inadequate visual representation of the project for the community.

The architectural renderings for the subject property do not accurately place the project in its proper context because the renderings only show the subject property and building themselves. For the community to fully understand the scope and impact of this project, they need to see renderings from all sides that show the surrounding neighborhood houses and apartment buildings. As a matter of fact, the applicant and his development team visited a meeting of the Pacific Palisades Community Council Land Use Committee (PPCC-LUC) last summer 2012 and the question of "rendering context" was raised at that time. The architects for the project stated flatly that "context renderings" were forthcoming. It's been almost a year and no "context renderings".

In addition, the applicant should provide an architectural north-south section of the project from Sunset Blvd. on the north to Pacific Coast Highway (PCH) on the south in order to provide the Planning Department proper documentation of views of the project from PCH.

Inadequate Review Period for Comments due by July 17, 2013.

I have extensive knowledge of other "letters of comment" being sent to the Department of Planning addressing the many issues on this project, therefore, it is my view that the Department of Planning cannot adequately review and assess the enormous amount of documentation from these comments between the comment deadline date of June 17, 2013 and a Hearing set for July 19, 2013. To give our comments the attention they deserve, the Hearing on July 19, 2013 should be canceled so our comments can be adequately addressed.

Simply stated...this project is not ready for a Hearing and requires a Focused EIR.

Support of other Commentors.

Please consider that I fully support the statements and letters of other commentors, in part they are:

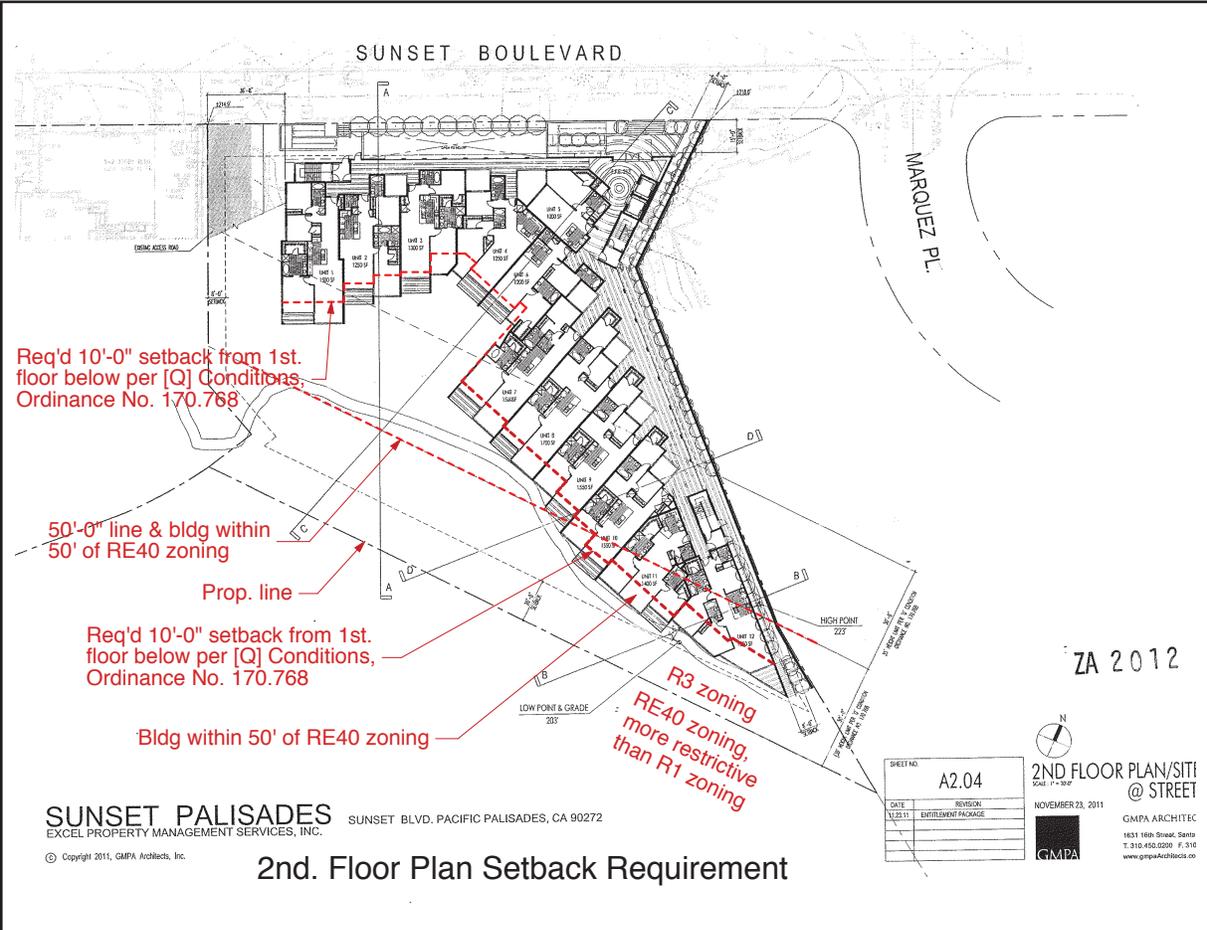
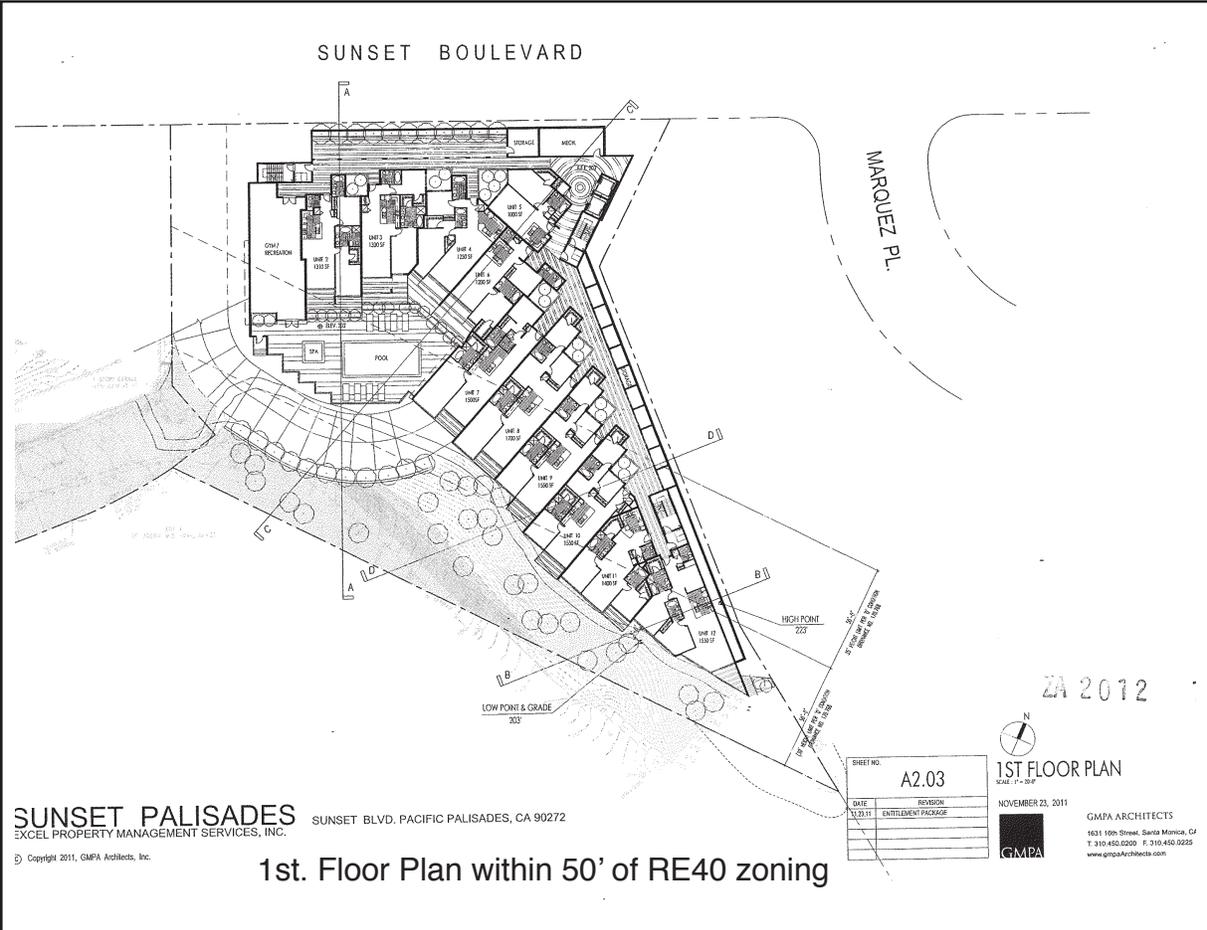
- Jack Allen (veteran resident of Pacific Palisades)
- Amy Lundberg (adjacent property owner)
- Andy Lundberg (adjacent property owner)
- Christian Martin (adjacent property owner)
- Larry Larson (adjacent property owner)
- Marquez Knolls Property Owners Association (MKPOA)
- Suzanne Roberts (adjacent property owner, Malibu Village)
- John Haag (adjacent property owner, Malibu Village)

Thank you for your consideration of my comments.

Best Regards,



John E. Glasgow



[Q] QUALIFIED PERMANENT CONDITIONS OF APPROVAL

Sec. 2. Pursuant to Section 12.32-K of the Los Angeles Municipal Code the following limitations are hereby imposed upon the use of that property shown in Section 1 hereof which is subject to the Permanent "Q" Qualified classification.

No Multiple Dwelling shall be erected, constructed or added to unless such erection, construction or addition meets the following conditions:

A. Height

1. Less than 50 feet from single family lot: Any part of a building or structure within 50 feet of any lot zoned R1 or more restrictive shall not exceed 30 feet in height, excluding rooftop structures; and
2. Fifty feet to 100 feet from single family lot: Any part of a building or structure within 100 feet of any lot zoned R1 or more restrictive shall not exceed 35 feet in height, excluding rooftop structures.

B. Setbacks: For any building or structure which is within 50 feet of a lot zoned R1 or more restrictive, the exterior wall of any second story shall be set back 10 feet horizontally from the exterior wall of the first story facing the lot zoned R1 or more restrictive.

C. Yards

1. Rear Yard: The rear yard shall be a minimum of 20 feet for lots whose rear lot line abuts a lot zoned R1 or more restrictive.
2. Side Yard: The side yard shall be a minimum of 10 feet for lots whose side lot line abuts a lot zoned R1 or more restrictive.
3. Exception: The above shall not apply where an alley separates the subject lot lines.

D. Parking

1. Ratios: Any multiple residential use shall provide for resident parking on the subject property, as required by Municipal Code Section 12.21-A.4, and additional resident and guest parking at a ratio of at least one quarter space per rental dwelling unit and one-half space per condominium in excess of that required by the Municipal Code. Any designated guest parking shall be clearly identified and readily accessible to guests of the project.
2. Tandem Spaces: Tandem parking may be used only for the spaces which are assigned and designated for a single residential unit.