



*A Community Organization Dedicated to Improving and Preserving
the Quality of Life in Laurel Canyon*

November 3, 2025

VIA ELECTRONIC MAIL

Zoning Administrator
City of Los Angeles
200 N. Spring Street, Room 763
Los Angeles, California 90012
jordann.turner@lacity.org
alexander.truong@lacity.org

**Re: Development Projects Proposed at 2166 and 2172 Stanley Hills
Drive, ZA-2025-1386-CU-HCA and ZA-2024-6711-CU-HCA; ENV-2024-
6712-CE**

Dear Zoning Administrator:

I am writing on behalf of the Laurel Canyon Association (“LCA”) to oppose the proposed development projects located at 2166 and 2172 Stanley Hills Drive, Los Angeles, CA 90046. As explained below, the projects do not comply with the State Minimum Fire Safe Regulations and the required findings for the projects cannot be made. Moreover, the City has failed to comply with CEQA.

I. The Projects Do Not Comply with the State Minimum Fire Safe Regulations and Los Angeles Municipal Code Section 57.4908.1

The Projects do not comply with LAMC Section 57.4908.1 and the State Minimum Fire Safe Regulations (“Regulations”). As explained below, Stanley Hills Drive does not meet the required standards for a new construction project in a Very High Fire Hazard Severity Zone. As a result of this non-compliance, the ZA cannot make the required findings to approve the requested deviations from the Code. The grant of a conditional use permit would not be in conformity with the public necessity, convenience, general welfare and good zoning practice. Moreover, the proposed projects will have a materially adverse safety impact on the surrounding neighborhood.

a. The State Minimum Fire Safety Regulations

In 2018, Senate Bill 901 mandated the expansion of the scope of California’s regulations regarding minimum fire safety standards to include those lands classified and designated as Very High Fire Hazard Severity Zones (“VHFHSZ”), as defined in subdivision (i) of Government Code § 51177, to include Local Responsibility Areas. These regulations were extended to those portions of incorporated cities such as the City of Los Angeles that were designated as VHFHSZ. Thereafter, the Board of Forestry adopted implementing regulations. The California Board of Forestry and Fire Protection adopted the Minimum Fire Safe Regulations in 2021. The regulations went into effect on April 1, 2023. The stated purpose of the Regulations is to “establish[] state minimum Wildfire protection standards in conjunction with Building, construction, and Development” in a VHFHSZ; to ensure that “future design and construction of Structures, subdivisions and Developments” in a VHFHSZ “shall provide for basic emergency access and perimeter Wildfire protection measures as specified in the following articles”; and to “provide for emergency access” compliant with minimum standards in the State Minimum Fire Safe Regulations. (§ 1270.02.) These regulations were adopted after extensive consultation with fire professionals and community members.

II. The City Has Incorporated the Regulations into the Los Angeles Municipal Code

The City has adopted the State Minimum Fire Safe Regulations into the Los Angeles Municipal Code at Section 57.4908.1. This section of the Code clearly states that “all residential building construction” within the City’s Very High Fire Hazard Severity Zones shall comply with the State Minimum Fire Safe Regulations. A screenshot from LAMC Section 57.4908.1 is shown below.

**SECTION 4908
FIRE SAFE DEVELOPMENT REGULATIONS**

4908.1 General.

Pursuant to PRC 4290 all residential, commercial and industrial building construction within state responsibility areas approved after January 1, 1991, and within lands classified and designated as an LRA Very High Fire Hazard Severity Zone, as defined in subdivision (i) of Section 51177 of the Government Code after July 1, 2021, shall comply with the SRA Fire Safe Development Regulations as specified in Title 14, Division 1.5, Chapter 7, Subchapter 2.

III. The Projects are Subject to the Regulations Because they Requires the Issuance of a “Use Permit.”

The Projects are clearly subject to the State Minimum Fire Safe Regulations. The projects in question are located in a Very High Fire Hazard Severity Zone as documented in ZIMAS.

Additional	
Airport Hazard	None
Coastal Zone	None
Coastal Bluff Potential	No
Canyon Bluff Potential	No
Farmland	Area Not Mapped
Urban Agriculture Incentive Zone	YES
Very High Fire Hazard Severity Zone	Yes
Fire District No. 1	No
Flood Zone	500 Yr
Watercourse	No
Methane Hazard Site	None
High Wind Velocity Areas	No
Special Grading Area (BOE Basic Grid Map A-13372)	Yes
Wells	None
Sea Level Rise Area	No
Oil Well Adjacency	No

As specified in Section 1270.03(a), the Regulations shall apply to: “(1) the perimeters and access to all residential, commercial, and industrial Building construction . . . approved after July 1, 2021 within the VHFHSZ . . .”

As further explained in Section 1270.03(c)(3), affected activities include, but are not limited to . . . “application for a use permit.”

The Projects clearly seek a “use permit.” Indeed, the applicant has sought the issuance of two “conditional use permits.” As such, the State Minimum Fire Regulations are triggered.

IV. Stanley Hills Drive Does Not Have Two Ten Foot Traffic Lanes

As noted above, the Regulations establish comprehensive minimum fire safety standards to mitigate the risk and severity of wildfires and to ensure safe egress and emergency access. One of the regulations pertains to width. Section 1273.01 provides in part:

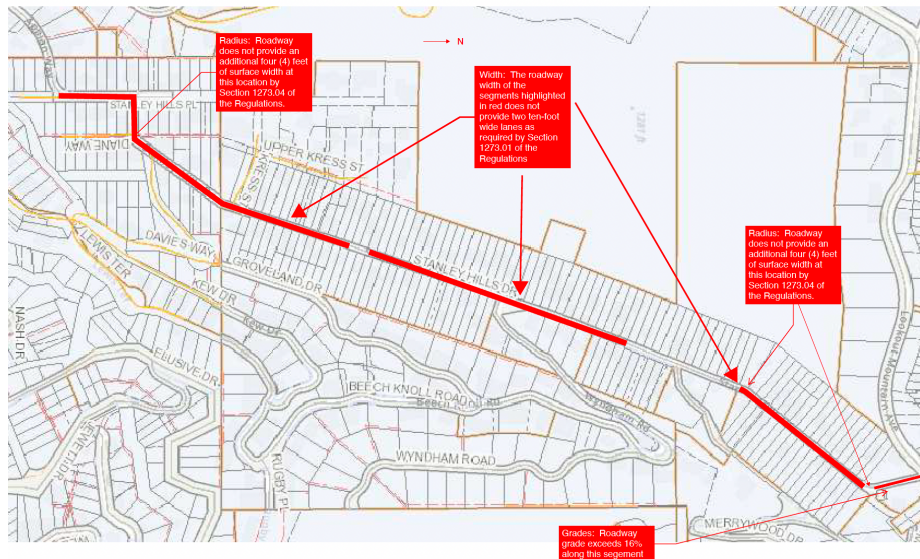
- (a) All roads shall be constructed to provide a minimum of two ten (10) foot traffic lanes, not including shoulder and striping. These traffic lanes shall provide for two-way traffic flow to support emergency vehicle and civilian egress, unless other standards are provided in this

article or additional requirements are mandated by Local Jurisdictions or local subdivision requirements. Vertical clearances shall conform to the requirements in California Vehicle Code section 35250.

As explained in the attached expert report attached as **Exhibit A**, Stanley Hills Drive is just 18 feet wide. Therefore, it does not provide for the required two (10) foot traffic lanes. As such, the Projects do not comply with the Regulations and LAMC Section 57.4908.1. Moreover, no alternative measures have been proposed that provide for the “Same Practicable Effect” as required by the Regulations.

V. Stanley Hills Drive Exceeds the Maximum Grade Allowed and Radius

Additionally, the expert report from Mr. Araujo attached as **Exhibit B** demonstrates that Stanley Hills Drive exceeds the maximum grade allowed under the State Minimum Fire Safe Regulations (16 percent) and does not meet the Regulation’ radius standards. Again, no alternative measures have been proposed that provide for the “Same Practicable Effect” as required by the Regulations. A diagram prepared by LCA’s expert showing where the roadway is deficient is shown below.



VI. The Projects Do Not Comply with the Setback Requirements Required by the State Minimum Fire Safet Regulations

The Regulations establish minimum standards for building siting and required justifications for any Exception from the setback standards. 14 C.C.R. § 1276.01 provides:

- (a) All parcels shall provide a **minimum thirty (30) foot setback** for all Buildings from all property lines and/or the center of a Road, except as provided for in subsection (b).
- (b) A reduction in the minimum setback shall be based upon practical reasons, which may include but are not limited to, parcel dimensions or size, topographic limitations, Development density requirements or other Development patterns that promote low-carbon emission outcomes; sensitive habitat; or other site constraints, and shall provide for an alternative method to reduce Structure-to-Structure ignition by incorporating features such as, but not limited to:
 - (1) non-combustible block walls or fences; or
 - (2) non-combustible material extending five (5) feet horizontally from the furthest extent of the Building; or
 - (3) hardscape landscaping; or
 - (4) a reduction of exposed windows on the side of the Structure with a less than thirty (30) foot setback; or
 - (5) the most protective requirements in the California Building Code, California Code of Regulations Title 24, Part 2, Chapter 7A, as required by the Local Jurisdiction.

The Projects as proposed do not provide the required minimum thirty (30) foot setback for all Buildings pursuant to 14 C.C.R. § 1276.01(a). Moreover, the applicant has not justified any deviations from this setback standard “upon practical reasons” pursuant to 14 C.C.R. § 1276.01(b) or mandated any “alternative method[s] to reduce Structure-to-Structure ignition.”

VII. It is Neither Impractical nor Infeasible to Widen the Stanley Hills Road Adjacent to the Project Site

LCA does not believe the ZA can make the required findings to deviate from the Hillside Ordinance in this instance. The ZA must be able to find that *"[T]he site and/or existing improvements make strict adherence to Paragraph (i) of Subdivision 10. of Subsection C. of Section 12.21 of this Code impractical or*

infeasible." In this case it is neither impractical nor infeasible to improve the portion of Stanley Hills Drive that is adjacent to the Project site. In fact, the widening of this portion of Stanley Hills Road will provide an opportunity for allow one car to pull over out of the way when another car approaches. This is critical in the event of an emergency as it facilitates concurrent ingress and egress. The applicant has provided no legitimate rationale from deviating from this requirement other than a desire to reduce development costs. Moreover, a small portion of the roadway could be left at 18 feet to preserve an existing pine tree near the street at the property line between 2166 and 2162 Stanley Hills Drive.

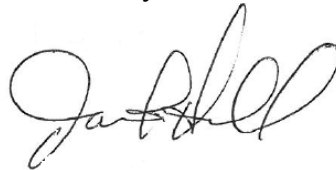
VIII. Environmental Impacts Preclude Usage of Categorical Exemption

The City asserts that the Project is exempt from environmental review under CEQA as a Class 3 Project. However, there are "unusual circumstances" that preclude the usage of this categorical exemption pursuant to CEQA Guidelines Section 15300.2, including the substandard nature of Stanley Hills Drive and the history of significant fire events in Laurel Canyon. Further, a host of environmental issues were raised when the project site was proposed to be developed in 2015 that have yet to be addressed. See letter dated February 12, 2015 attached hereto **Exhibit B**. The City cannot deem the projects exempt under these circumstances.

IX. Conclusion

For the foregoing reasons, the ZA should deny the requested entitlements. I may be contacted at 310-380-0845 or at jhall@laurelcanyon.org if you have any questions, comments or concerns.

Sincerely,



Jamie T. Hall
Laurel Canyon Association
President

November 3, 2025

Exhibit A

November 3, 2025

Project Number 25-05

Attention: Jamie Hall
Laurel Canyon Association
8453 Kirkwood Drive
Los Angeles, CA 90046

SUBJECT: State Minimum Fire Safe Regulations Ingress and Egress Requirements and 2166 and 2172 Stanley Hills Drive

Dear Mr. Hall,

Pursuant to your request, I have performed a field investigation of Stanley Hills Drive with respect to the State Minimum Fire Safe Regulations (“Regulations”), specifically as they pertain to Article 2, Ingress and Egress. The purpose of the investigation was to evaluate Stanley Hills Drive with respect to Article 2 of the Regulations, Los Angeles Municipal Code Section 57.4908, and the proposed development projects at 2166 Stanley Hills Drive and 2172 Stanley Hills Drive (“Projects”) and document any deficiencies. This report presents the findings of my investigation.

EXECUTIVE SUMMARY

Stanley Hills Drive is located in the central region of the City of Los Angeles (“City”) in the Eastern Santa Monica Mountains and is classified by the City as a local street. Laurel Canyon Association (“Association”) has hired Brandon Araujo, a professional Civil Engineer registered in the State of California, to conduct a field investigation of Stanley Hills Drive and prepare a report as to whether it meets the requirements for roadways as set forth in California Code of Regulations, Title 14 Natural Resources, Division 1.5 – Department of Forestry and Fire Protection, Chapter 7 – Fire Protection, Subchapter 2 – State Minimum Fire Safe Regulations, Article 2 – Ingress and Egress. Upon completion of his field investigation, Mr. Araujo determined that Stanley Hills Drive did not meet the Regulations with respect to width, grades, and radius. Therefore, Stanley Hills Drive also does not comply with Los Angeles Municipal Code Section 57.4908 (which incorporates the Regulations into the City’s Municipal Code) and the Projects, which rely on Stanley Hills Drive for ingress and egress, are not in compliance with the Regulations or LAMC Section 57.4908. See **Exhibit 1, Overview of Deficiencies**, for an overview of the deficiencies documented in this report. This exhibit, and all other exhibits referenced in this report, can be found in **Attachment 1**.

BACKGROUND

Stanley Hills Drive is located in the Bel Air-Beverly Crest Neighborhood Council of the City and is classified by the City as a local street. Stanley Hills Drive begins in the north at its intersection with Lookout Mountain Avenue and ends at its intersection with Appian Way to the south.

The proposed Projects are located at 2166 Stanley Hills Drive (APN 5567-010-011) and 2172 Stanley Hills Drive (APN 5567-010-042) and are located approximately 1,500 feet south of the intersection of Lookout Mountain Avenue and Stanley Hills Drive.

In October 2025, the Association hired Brandon Araujo, P.E. to conduct a field investigation and evaluate Stanley Hills Drive with respect to the Projects and the Regulations and document any instances where the roadway did not meet the standards set forth therein. The text of the Regulations, as provided by the State of California's Office of Administrative Law, can be found in **Attachment 2**.

PROFESSIONAL CREDENTIALS

Mr. Araujo is a professional Civil Engineer registered in the State of California and has been licensed since January 2010. He has extensive experience reviewing street improvement plans and evaluating them based on established standards. He also has extensive experience performing field investigations of roadway facilities to document existing roadway and/or traffic deficiencies and verifying their compliance with approved plans or established standards. See **Attachment 3** for his resume.

METHODOLOGY

Mr. Araujo conducted a field investigation in a manner consistent with the level of care and skill exercised by members of his profession currently practicing under similar conditions in the Southern California area. His investigation took place on Saturday, October 25, 2025. Distances less than 25 feet were measured with a measuring tape, distances greater than 25 feet were measured with a measuring wheel "along the ground", and grades were measured with a digital level. Per Section 1270.08, Distance Measurements, of the Regulations "all specified or referenced distances are measured along the ground, unless otherwise stated."

FINDINGS

Existing Conditions

Stanley Hills Drive's northern terminus is located at the intersection of Lookout Mountain Avenue and Stanley Hills Drive at an elevation of approximately 836 feet. The southern terminus of Stanley Hills Drive is located at its intersection with Appian Way at an elevation of approximately 1,115 feet. Stanley Hills Drive is approximately 2,900 long as measured along its street centerline along the ground.

With respect to roadway cross section and horizontal and vertical alignment, the field investigation found that the roadway was generally consistent with the City's as-built plans for Stanley Hills Drive. Sheet Index No. P-2383, Profile of Stanley Hills Drive from Lookout Mountain Road to 190.90 Feet Southerly from Stanley Hills Place, shows the plan and profile for the entirety of Stanley Hills Drive and was approved on October 25, 1928. See **Exhibit 2.1** for a copy of these plans. Sheet Index No. P-38421, shows the plan and profile for Stanley Hills Drive along the frontage of 2104 Stanley Hills Drive as accepted by the City on March 9, 2018. See **Exhibit 2.2** for a copy of these plans.

Stanley Hills Drive is a concrete paved street and, for virtually all of its length, measures 18 feet wide as measured from curb face to curb face.

Its horizontal alignment lies mostly on a tangent but features three sharp curves. The first sharp curve is located near its northern terminus and ends at Station 2+06.62 as measured along the "Right Side" of the roadway.¹ The second sharp curve is located from Station 6+23.38 to 6+42.26. The third sharp curve is located near Stanley Hills Drive's southern terminus from Station 25+53 to Station 26+25.18.

Much of Stanley Hills Drive has a grade of 12% but flattens out near its southern terminus. Over its length, Stanley Hills Drive features grades that vary from 0 percent to 18.2 percent.

¹All stations cited here are from the City's as-built plan for Stanley Hills Drive, Sheet Index No. P-2383. The stations cited here are taken from what the plans refer to as the "Right Side" of the road where the "Right Side" side of the road is the edge of the roadway furthest to the west, or, the right side of the road if you are looking down the centerline of the road and toward the south.

Stanley Hills Drive primarily serves motor vehicles driving to and from single family residential homes. Mr. Araujo observed low traffic volumes traveling in both the north- and southbound directions, at speeds of 25 to 35 miles per hour.

Traffic in the southbound direction is prohibited from stopping via the placement of Tow-Away No Stopping Any Time signs along the length of Stanley Hills Drive facing southbound traffic. See **Exhibit 2.3** for a photograph of one of these signs. Traffic in the northbound direction is not prohibited from stopping and parking in the northbound direction is allowed except on “Red Flag Days” as demonstrated by the placement of No Parking Red Flag Days signs installed along the length of Stanley Hills Drive facing northbound traffic. See **Exhibit 2.4** for a photograph of one of these signs.

Facility Determination

Article 2 of the Regulations refers to three different types of facilities: driveways, one-way roads, and two-way roads.

Section 1270.01(i) of the Regulations defines a “driveway” as follows: “A vehicular pathway that serves no more than four (4) Residential Units and any number of non-commercial or non-industrial Utility or Miscellaneous Group U Buildings on each parcel. A Driveway shall not serve commercial or industrial uses at any size or scale.” A “road,” on the other hand, is defined in Section 1270.01(y) as follows: “A public or private vehicular pathway to more than four (4) Residential Units, or to any industrial or commercial Occupancy.” Since Stanley Hills Drive serves more than four (4) Residential Units based on my personal observations and review of the number of homes utilizing Stanley Hills Drive via the City’s Zone Information and Map Access System (“ZIMAS”), it cannot be considered a driveway as defined by the Regulations.

Traffic control signs are installed facing both south- and northbound traffic consistent with a two-way road. In addition, since there are no traffic signs nor pavement markings nor physical barriers prohibiting or discouraging motor vehicle travel in either the south- or northbound directions, Stanley Hills Drive cannot be considered a one-way road.

Since Stanley Hills Drive serves more than four residential units and it serves traffic in both the south- and northbound directions, it was evaluated based on the Regulations’ requirements for a two-way road.

Width

Section 1273.01(a) of the Regulations states:

All roads shall be constructed to provide a minimum of two ten (10) foot traffic lanes, not including shoulder and striping. These traffic lanes shall provide for two-way traffic flow to support emergency vehicle and civilian egress, unless other standards are provided in this article or additional requirements are mandated by Local Jurisdictions or local subdivision requirements.

The City's as-built plans for Stanley Hills Drive show its cross section as 18' wide measured from curb face to curb face. See the "Typical Grading Sections" on Sheet Index No. P-2383 in **Exhibit 2.1** for a cross section of Stanley Hills Drive that shows its width as 18' wide from curb face to curb face. Multiple measurements of the width taken along Stanley Hills Drive confirms that Stanley Hills Drive measures 18 feet wide for virtually its entire length². The City's own Administrative Review and Checklist for the Projects show that they are aware that Stanley Hills Drive is less than 20 feet in width.

Since Stanley Hills Drive does not provide a minimum of two ten (10) foot traffic lanes that provide for two-way traffic flow to support emergency vehicle and civilian egress, Stanley Hills Drive does not meet the Regulations' requirements with respect to width and, consequently, does not comply with LAMC Section 57.4908.

Grades

Section 1273.03(a) of the Regulations states "At no point shall the grade for all Roads and Driveways exceed 16 percent." The next section, Section 1273.03(b), states that "The grade may exceed 16%, not to exceed 20%, with approval from the Local Jurisdiction and with mitigations to provide for Same Practical Effect."³

² Stanley Hills Drive has been widened along two distinct segments. It was widened along 2104 Stanley Hills Drive from 18 feet wide to 21 feet. This widening can be seen in the City's as-built plans for this work, Sheet Index No. P-38421. The other widening took place in front of 2234 Stanley Hills Drive and 2240 Stanley Hills Drive and widened the roadway from 18 feet to 20 feet. As-built plans for this widening could not be found on the City's NavigateLA application. These two segments combined constitute approximately 8 percent of the overall length of Stanley Hills Drive.

³ Same Practical Effect is defined in Section 1270.1 of the Regulations: "As used in this subchapter, means an Exception or alternative with the capability of applying accepted wildland fire suppression strategies and tactics, and provisions for fire fighter safety, including:

- (1) access for emergency wildland fire equipment,
- (2) safe civilian evacuation,
- (3) signing that avoids delays in emergency equipment response,
- (4) available and accessible water to effectively attack Wildfire or defend a Structure from Wildfire, and
- (5) fuel modification sufficient for civilian and fire fighter safety."

During the field investigation, Stanley Hills Drive was found to have a grade in excess of 16 percent from Station 0+10.65 to Station 1+64.43. Photographs showing the grade in excess of 16 percent at the location are provided in **Exhibits 3.1, 3.2, and 3.3**.

There is no evidence in the permit documents to suggest the City has implemented mitigations to provide for Same Practical Effect.

Since the grade of this segment of Stanley Hills Drive exceeds 16% and there is no evidence to suggest the City has implemented mitigations to provide for Same Practical Effect, Stanley Hills Drive does not meet the Regulations' requirements with respect to grade and, consequently, does not comply with LAMC Section 57.4908.

Radius

Section 1273.04(a) of the Regulations state "No Road or Road Structure shall have a horizontal inside radius of curvature of less than fifty (50) feet. An additional surface width of four (4) feet shall be added to curves of 50-100 feet radius; two (2) feet to those from 100-200 feet."

Sheet Index No. P-2383, show the three curves mentioned under the Existing Conditions section of this Report and images from those curves are provided in **Exhibits 4.1, 4.2, and 4.3**.

Measurements taken in the field demonstrate that each curve is less than 100 feet in radius yet the roadway width around those curves remains constant at 18 feet and does not provide an additional surface width of four (4) feet.

Since the width of Stanley Hills Drive does not provide an additional surface width of four (4) feet along these curves, Stanley Hills Drive does not meet the Regulations' requirements with respect to radius and, consequently, does not comply with LAMC Section 57.4908.

CONCLUSION

Stanley Hills Drive does not meet the State Minimum Fire Safe Regulations as they pertain to Article 2, Ingress and Egress and, consequently, does not comply with LAMC Section 57.4908. Specifically, Stanley Hills Drive does not meet the Regulations with respect to width, grades, and radius. The width of virtually all of Stanley Hills Drive is less than the minimum width required in the Regulations, the segment of Stanley Hills Drive from Station 0+10.65 to Station 1+64.43 features multiple instances where the grade exceeds the maximum allowed under the Regulations with no evidence of mitigations implemented to provide for Same Practical Effect, and the roadway width does not provide an additional four (4) feet required for curves less than 100 feet in radius as required by the Regulations. Since the Projects proposed at 2166 and 2172 Stanley

November 3, 2025

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Hills rely on Stanley Hills Drive for ingress and egress, they do not comply with the Regulations or LAMC Section 57.4908.

If you have any further questions, please let me know.

Sincerely,



Brandon Araujo, P.E.
R.C.E 75996

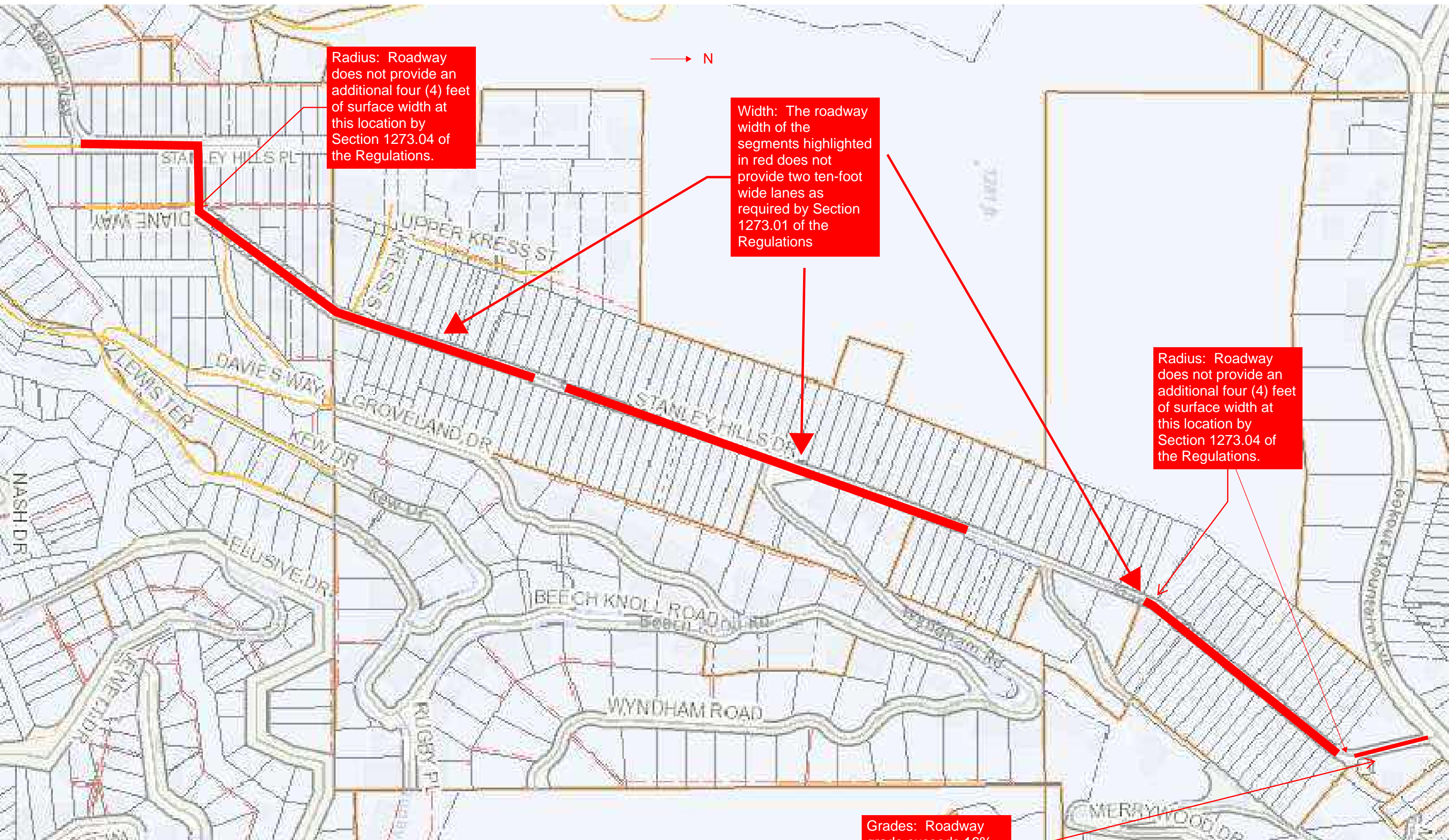


Attachments

- 1) Exhibits
- 2) State Minimum Fire Safe Regulations, Article 2, Ingress and Egress
- 3) Brandon Araujo's Resume

ATTACHMENT 1
EXHIBITS

Exhibit 1
Overview of Deficiencies



Radius: Roadway does not provide an additional four (4) feet of surface width at this location by Section 1273.04 of the Regulations.

Width: The roadway width of the segments highlighted in red does not provide two ten-foot wide lanes as required by Section 1273.01 of the Regulations

Radius: Roadway does not provide an additional four (4) feet of surface width at this location by Section 1273.04 of the Regulations.

Grades: Roadway grade exceeds 16% along this segment

November 3, 2025

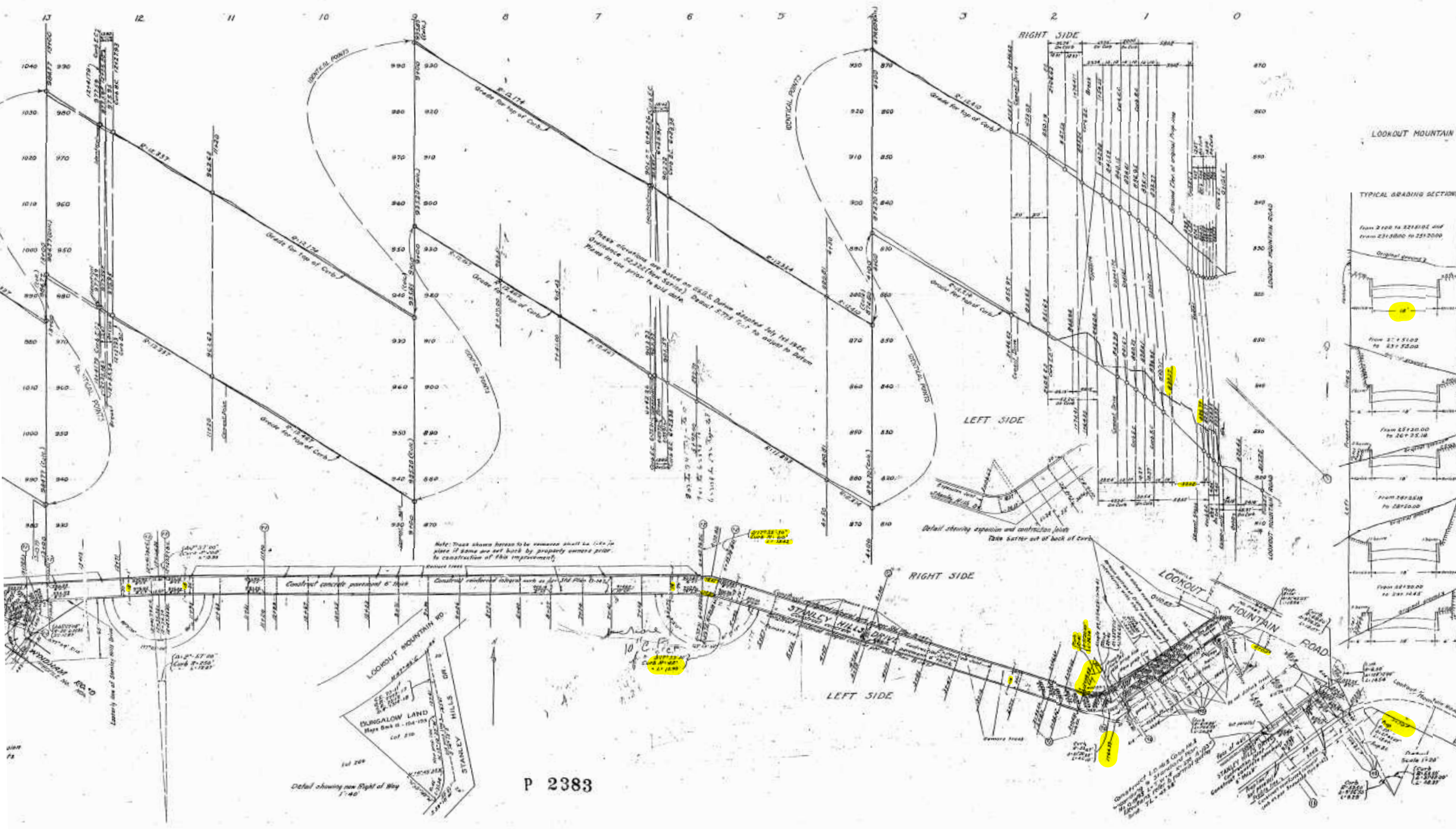
Project Number 25-05

Exhibit 2.1

Sheet Index No. P-2383

Profile of Stanley Hills Drive from Lookout Mountain Road to 190.90 Feet Southerly from
Stanley Hills Place

Approved by the City on October 25, 1928

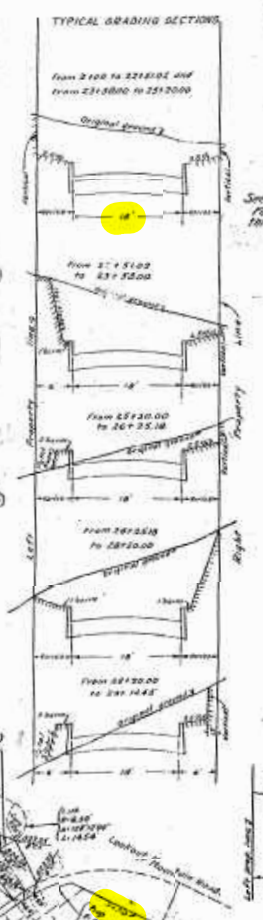


PROFILE OF STANLEY HILLS DRIVE
 FROM LOOKOUT MOUNTAIN ROAD TO 190.90 FEET SOUTHERLY FROM STANLEY HILLS PLACE
 CITY OF LOS ANGELES
 JOHNIC SHAW CITY ENGINEER JAN 1926
 WIDTH OF STACEY VARIES
 FIELD BOOK NO. 9776 Page 2
 FIELD WORK BY CRIBELL 11-3-1925
 PLATTED BY TUPPER 1-13-1926

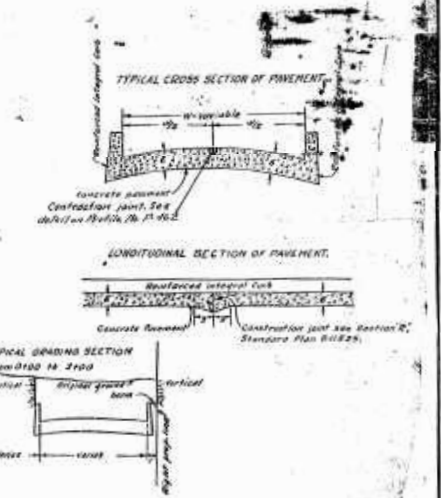
Approved: *J. J. Shaw*
 JOHNIC SHAW
 City Engineer
 Approved: *W. H. Tupper*
 W. H. TUPPER
 District Engineer

DOUBLE SCALE VERTICAL
 Scale on left 1" = 100' 1/2"
 Scale on right 1" = 100'

FOR NOTICE TO CONTRACTORS
 See Profile No. P-462 for outline of district see profile P-462 for list of Plans and Profiles showing work to be included in this improvement See Profile No. P-462



Plan checked for Sanitary Sewers *B. E. D. Dicks* (Plumber) over Sanitary Sewer Plans B-1482
 Plan checked for Storm Drains *James W. Kelly* (Plumber) over Storm Drain Plans D-1986
 Plan checked for water mains and services *D. H. L. L. L.* over Water System Plans S-1322
 Local depressions involved *W. H. Tupper* (Engineer)



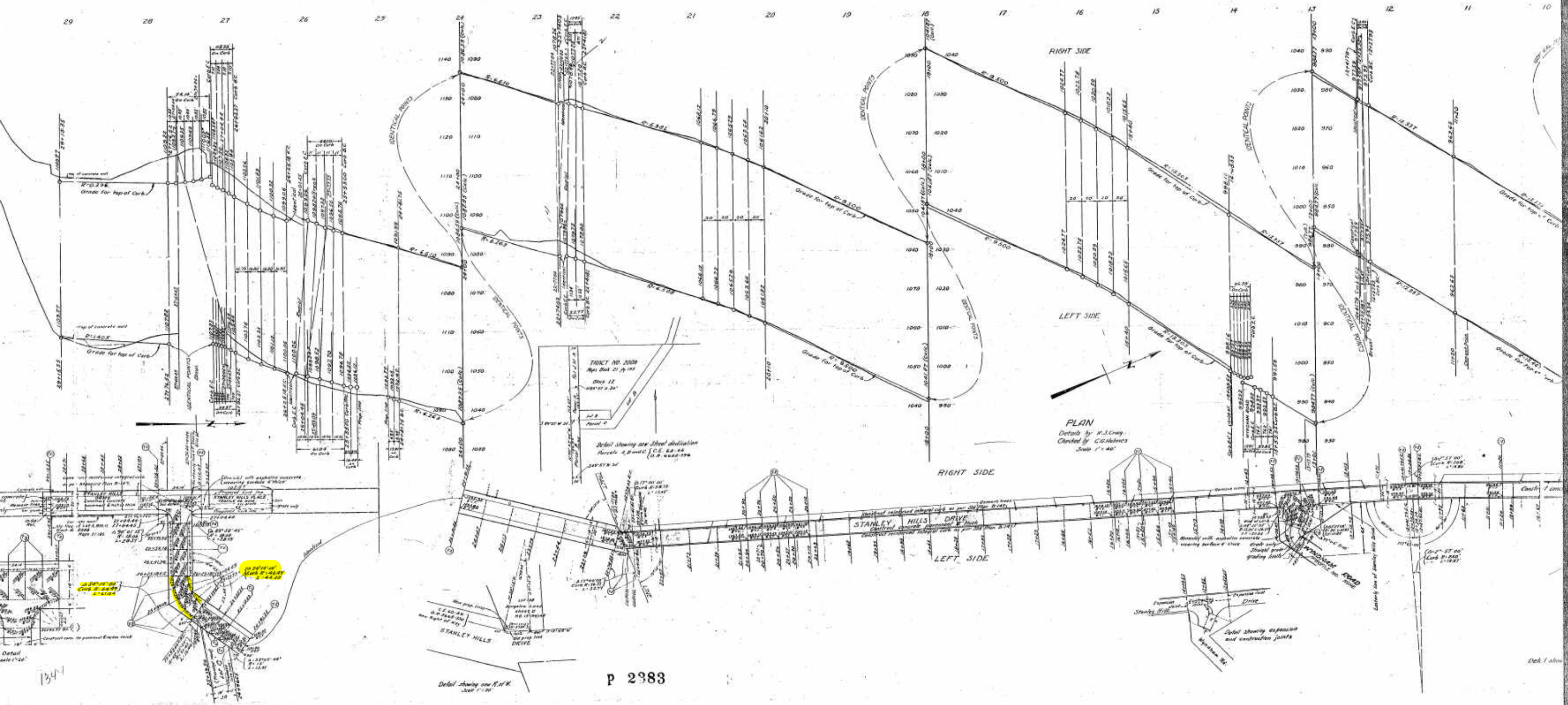
LOOKOUT MOUNTAIN ROAD AND WONDERLAND AVENUE IMPROVEMENT DISTRICT ACT. N. 30982

P 2383

P-2383

I certify that this drawing is a true and correct copy of a record of the City of Los Angeles filed and preserved to official standards under my direction and control in accordance with Section 12.4 (L.A.C. and Section 1820.5 of the California Government Code.
James W. Kelly
 District Engineer

29X 1



PLAN
 Details by W.J. Craig
 Checked by C.G. Habins
 June 11, 40

P 2383

I certify that this is a true and correct copy of a record of the City of Los Angeles, filed and processed in accordance with Section 12.4 LAM and Section 1409.5 of the California Government Code.

Jacqueline Robinson
 Deputy City Auditor, Office of Engineering

29X 2

November 3, 2025

Project Number 25-05

Exhibit 2.2

Sheet Index No. P-38421

N. Stanley Hill Drive Drive E/O Kress St., ZAA-2014-1621-ZAD-ZAA-1A

Accepted by the City on October 25, 1928

NOTICE TO CONTRACTORS

- SPECIFICATIONS: ALL WORK SHALL CONFORM TO THE LATEST EDITION AND SUPPLEMENTS OF "THE STANDARD SPECIFICATIONS FOR PUBLIC WORKS CONSTRUCTION" (GREENBOOK), AND THE CORRESPONDING "ADDITIONS AND AMENDMENTS TO THE LATEST EDITION OF THE STANDARD SPECIFICATIONS FOR PUBLIC WORKS CONSTRUCTION" (BROWN BOOK).
- THIS IMPROVEMENT CONSISTS OF WORK CALLED FOR ONLY ON THIS PLAN.
- STANDARD PLANS FOR THIS PROJECT:
CITY OF LOS ANGELES
S-110-1 HOUSE CONNECTION SEWERS
S-251-1 PIPE LAYING IN TRENCHES
S-410-2 TYPES OF CURB AND GUTTER
S-430-1 JOINTS IN CONCRETE PAVEMENT
S-432-1 STANDARD STREET CROWN SECTIONS
S-440-3 DRIVEWAYS
S-627-0 SYMBOLS FOR CONSTRUCTION NOTES
S-791-1 ADVANCE CONSTRUCTION NOTICE SIGNS
- INSPECTION: ALL WORK AND MATERIALS SHALL BE INSPECTED BY THE INSPECTOR OF PUBLIC WORKS DURING CONSTRUCTION PURSUANT TO LATEST EDITION OF STANDARD SPECIFICATIONS FOR PUBLIC WORKS CONSTRUCTION (GREENBOOK) AS AMENDED BY THE CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS "BROWN BOOK", AND THE STANDARD PLANS FOR PUBLIC WORKS CONSTRUCTION AS APPLICABLE. CALL (213) 485-5080 BEFORE NOON OF THE WORKING DAY BEFORE THE FIRST SCHEDULED DAY OF CONSTRUCTION. PRIOR TO THE START OF ANY CONSTRUCTION, DEMOLITION, REMOVALS, SAWCUTTING, OR INSTALLATION OF TRAFFIC CONTROL THE CONTRACTOR SHALL MEET WITH THE INSPECTOR TO DISCUSS SAFETY, TRAFFIC CONTROL REQUIREMENTS, PUBLIC ACCESS, CONSTRUCTION IMPACT MITIGATION, REMOVAL LIMITS, AND CONTRACTOR'S PLANNED SEQUENCING OF OPERATIONS.
PRIOR TO OR AT THE PROJECT PRECONSTRUCTION MEETING THE PERMITTEE OR ITS CONTRACTOR SHALL PROVIDE THE INSPECTOR TWO SETS OF FULL-SIZE PLANS AND MAINTAIN ONE SET OF FULL-SIZE PLANS AT THE SITE DURING CONSTRUCTION. INDEXED PLANS ARE AVAILABLE FROM THE CITY'S WEBSITE AT [HTTP://ENGVault.LACity.org](http://ENGVault.LACity.org).
- THE CONTRACTOR, IN CONFORMANCE WITH LOS ANGELES CITY ORDINANCE NO. 150,478 SHALL POTHOLE EXISTING SUBSURFACE INSTALLATIONS CARRYING UNSTABLE SUBSTANCES TO DETERMINE THEIR LOCATIONS AND ELEVATIONS BEFORE COMMENCING EXCAVATION.
- UNDERGROUND SERVICE ALERT: BEFORE COMMENCING ANY EXCAVATION, THE CONTRACTOR SHALL OBTAIN AN UNDERGROUND SERVICE ALERT (USA) INQUIRY I.D. NUMBER BY CALLING (800) 227-2600. TWO WORKING DAYS SHALL BE ALLOWED AFTER THE I.D. NUMBER IS OBTAINED AND BEFORE THE CONTRACTOR STARTS THE EXCAVATION WORK SO THAT UTILITY OWNERS CAN BE NOTIFIED. IF THE UTILITY OWNER IS THE CITY OF LOS ANGELES, A CONFIRMATION NUMBER INDICATING THE CITY HAS BEEN NOTIFIED SHALL BE OBTAINED BY USA AND/OR THE CONTRACTOR FROM THE APPROPRIATE CITY DEPARTMENT. THE I.D. NUMBER TOGETHER WITH THE DATE ACQUIRED SHALL BE REPORTED TO THE BUREAU OF CONTRACT ADMINISTRATION WHEN CALLING FOR INSPECTION. I.D. NUMBERS WILL NOT BE GIVEN MORE THAN 10 DAYS BEFORE STARTING EXCAVATION WORK.
- AT LEAST THIRTY (30) DAYS BEFORE THE START OF CONSTRUCTION THE CONTRACTOR / ENGINEER SHALL CONTACT THE BUREAU OF STREET SERVICES, COORDINATING SECTION AT (213) 847-3200 TO VERIFY THAT THERE IS NO PROPOSED PROJECT IN THIS AREA.
- NOTIFICATION: AT LEAST TEN (10) DAYS BEFORE THE START OF CONSTRUCTION, THE CONTRACTOR SHALL NOTIFY, IN WRITING, ABUTTING PROPERTY OCCUPANTS OF THE PROPOSED CONSTRUCTION START DATE. A COPY OF SAID WRITTEN NOTIFICATION SHALL BE PROVIDED TO THE PUBLIC WORKS INSPECTOR FOR APPROVAL BEFORE THEY ARE DISTRIBUTED TO THE OCCUPANTS OF THE ABUTTING PROPERTY.
- ADVANCE CONSTRUCTION NOTICE SIGNS:
IN ADDITION TO SIGNS REQUIRED BY THE PROVISIONS OF THE "WORK AREA TRAFFIC CONTROL HANDBOOK" (WATCH), LATEST EDITION, FURNISH AND PLACE SIGNS FOR GIVING ADVANCE NOTICE TO MOTORISTS OF TRAFFIC DISRUPTION AS PART OF THIS PROJECT IN ACCORDANCE WITH STANDARD PLAN S-791-1.
- CUTS OR EXCAVATIONS IN STREETS THAT HAVE BEEN RESURFACED ONE YEAR OR LESS FROM THE DATE OF A PROPOSED CUT OR EXCAVATION ARE PROHIBITED UNLESS THE PERMITTEE RESURFACES THE ENTIRE BLOCK OR INTERSECTION WITHIN WHICH SUCH CUT OR EXCAVATION OCCURS, PER ORDINANCE NO. 171922, 171923, 171924, AND SPECIAL ORDER NO. 06-0807.
- CONSTRUCTION STAKES FOR CURB AND LONGITUDINAL GUTTER, WITH GRADE LESS THAN 0.50%, SHALL BE SET AT 12.5 FEET ON CENTER.
- REMOVALS:
A. REMOVE ALL EXISTING IMPROVEMENTS THAT INTERFERE WITH THE CONSTRUCTION OF THIS PROJECT.
B. ALL UTILITIES SHALL BE REMOVED OR RELOCATED BY OTHERS.
- IN ADDITION TO THE CONSTRUCTION OF PAVEMENT SHOWN HEREON, WORK REQUIRED UNDER THIS PLAN WILL ALSO INCLUDE THE CONSTRUCTION OF PERMANENT TRENCH RESURFACING IN ALL AREAS WHERE UTILITY LINES HAVE BEEN INSTALLED TO SERVE THIS DEVELOPMENT. CONDITIONS OF TRENCH BACKFILL AND RESURFACING SHALL BE AS SPECIFIED ON THE EXCAVATION PERMIT. PAVING OF ROADWAY AREAS SHALL BE WITHHELD UNTIL CONTEMPLATED UTILITY CHANGES OR INSTALLATIONS HAVE BEEN MADE UNDER CITY PERMIT.
- REPAIR AND/OR REPLACE ANY EXISTING BROKEN OR OFF-GRADE PAVEMENT, CONCRETE CURB, GUTTER OR SIDEWALK IMMEDIATELY ADJACENT TO OR WITHIN THE AREA OF THIS IMPROVEMENT SATISFACTORY TO THE CITY ENGINEER.
- SURVEY MONUMENT PRESERVATION IS REQUIRED AND SHALL INCLUDE SUBMITTAL OF PREAND POST CONSTRUCTION SURVEY MONUMENT TIES TO BOTH HORIZONTAL AND VERTICAL CONTROL POINTS PUBLISHED IN THE LOS ANGELES CITY ENGINEER FIELD BOOKS AND PRECISE BENCHMARK BOOKS. THIS DOES NOT RELIEVE THE CONTRACTOR OF FULFILLING ANY ADDITIONAL REQUIREMENTS SET FORTH BY SECTIONS 2-9.1 AND 2-9.3 OF THE LATEST EDITION OF THE STANDARD SPECIFICATIONS FOR PUBLIC WORKS CONSTRUCTION (GREENBOOK AND BROWN BOOK).
- IMPORTANT NOTICE: ALL REQUIRED PUBLIC IMPROVEMENTS MUST BE COMPLETED BEFORE A TEMPORARY CERTIFICATE OF OCCUPANCY OR A CERTIFICATE OF OCCUPANCY WILL BE ISSUED FOR THIS PROJECT PER ORDINANCE NO. 165081.
- TRAFFIC LANE REQUIREMENTS:
STANLEY HILLS DR
THE STANDARD SPECIFICATIONS ARE SATISFACTORY FOR TRAFFIC REQUIREMENTS. MAINTAIN LOCAL AND EMERGENCY ACCESS AT ALL TIMES.

FOLLOW THE TEMPORARY TRAFFIC CONTROL PROVISIONS OF THE CALIFORNIA MANUAL ON UNIFORM TRAFFIC CONTROL DEVICES (MUTCD) 2014 EDITION (OR LATEST CITY ADOPTED

EDITION) AND THE 2016 "WATCH" MANUAL (OR LATEST CITY ADOPTED EDITION).

TRAFFIC CONTROL DEVICES MAINTENANCE:

THE B-PERMITTEE SHALL PAY FOR THE RESTORATION OF ALL OBLITERATED STRIPING AND PAVEMENT MARKINGS AND FOR THE REINSTALLATION OF ALL MISSING, DAMAGED AND NECESSARY TRAFFIC CONTROL DEVICES (I.E., SIGNS, CURB MARKING, SPEED HUMPS, STAMPED CROSSWALKS, PARKING METERS, ETC.). THE CONTRACTOR SHALL BE REQUIRED TO PHYSICALLY INSTALL SOME OR ALL THE TRAFFIC CONTROL DEVICES TO THE SATISFACTION OF LADOT. THE ENTIRE COST THEREOF SHALL BE BORNE BY THE CONTRACTOR. THE STRIPING AND PAVEMENT MARKINGS SHALL BE INSTALLED UTILIZING THERMOPLASTIC MATERIALS PER LADOT SPECIFICATIONS. THE CONTRACTOR SHALL CONTACT LADOT'S CITYWIDE INVESTIGATIONS AT (213) 928-9625 PRIOR TO COMMENCING ANY WORK THAT REQUIRES TRAFFIC CONTROL DEVICES MAINTENANCE.

FOR TRAFFIC RELATED QUESTIONS DURING CONSTRUCTION, PLEASE CONTACT LADOT'S HOLLWOOD -WILSHIRE DISTRICT OFFICE, AT (323) 957-6843.

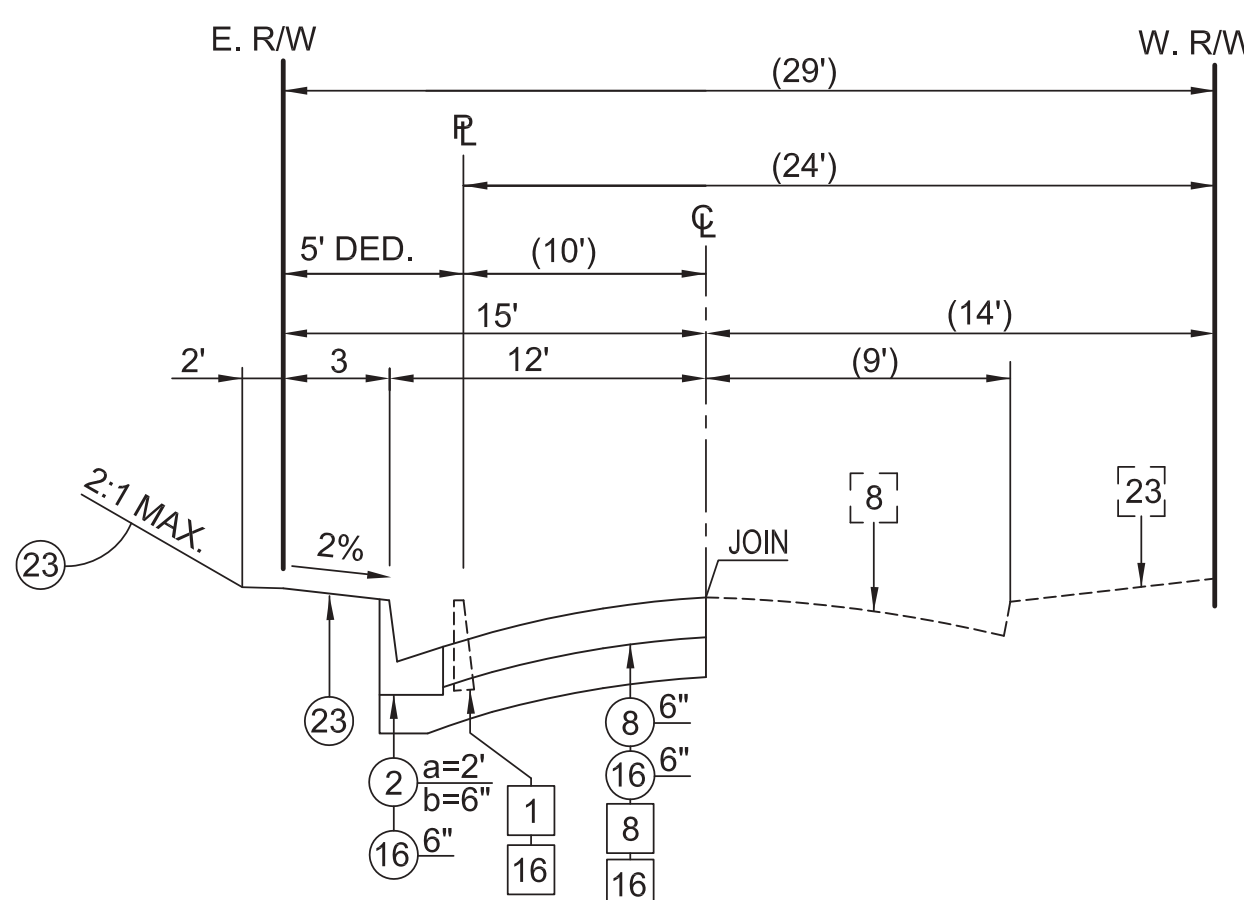
- WHEN B-PERMIT PROJECT IS NEARING CONSTRUCTION COMPLETION OR UPON RECEIVING THE STATEMENT OF COMPLETION FROM THE PUBLIC WORKS INSPECTOR'S OFFICE (BUREAU OF CONTRACT ADMINISTRATION), CONTRACTOR SHALL:
 - NOTIFY B-PERMIT PRIVATE ENGINEER OF RECORD TO PREPARE AN SUBMIT "AS-BUILT" PLANS TO CENTRAL DISTRICT B-PERMIT PRIMARY PLAN CHECKER.
 - PROVIDE INTERIM CHANGE ORDERS(ICA) SIGNED & APPROVED BY ALL OFFICES TO THE B-PERMIT PRIVATE ENGINEER OF RECORD.
 - UNLESS OTHERWISE INDICATED, B-PERMIT PRIVATE ENGINEER OF RECORD IS RESPONSIBLE FOR PREPARING "ELECTRONIC AS-BUILT" PLANS IN COORDINATION WITH THE CONTRACTOR. "ELECTRONIC AS-BUILT" PLANS MUST BE PREPARED BASED ON THE CITY ORIGINAL INDEX PLANS AVAILABLE FROM CITY BOE'S VAULT: [HTTP://ENGVault.LACity.org](http://ENGVault.LACity.org) "ELECTRONIC AS-BUILT" PLANS WITH COPIES OF ALL ICA'S (SIGNED & APPROVED BY ALL OFFICES) SHALL BE EMAIL TO THE PRIMARY PLAN CHECKER.

ELECTRONIC AS-BUILT PLANS PROCEDURES CAN BE OBTAINED BY EMAILING THE PRIMARY PLAN CHECKER. PLEASE CONTACT THE FRONT OFFICE STAFF AT (213) 482-7479, (213) 482-7474, OR (213) 482-7483 TO FIND OUT THE B-PERMIT PRIMARY PLAN CHECKER. AS-BUILT PLANS PROCEDURES ARE ALSO AVAILABLE FOR PICK UP AT THE CENTRAL DISTRICT B-PERMIT COUNTER OFFICE LOCATED 201 N. FIGUEROA ST, ROOM770.

SEWER CONNECTION ADDITIONAL NOTES:

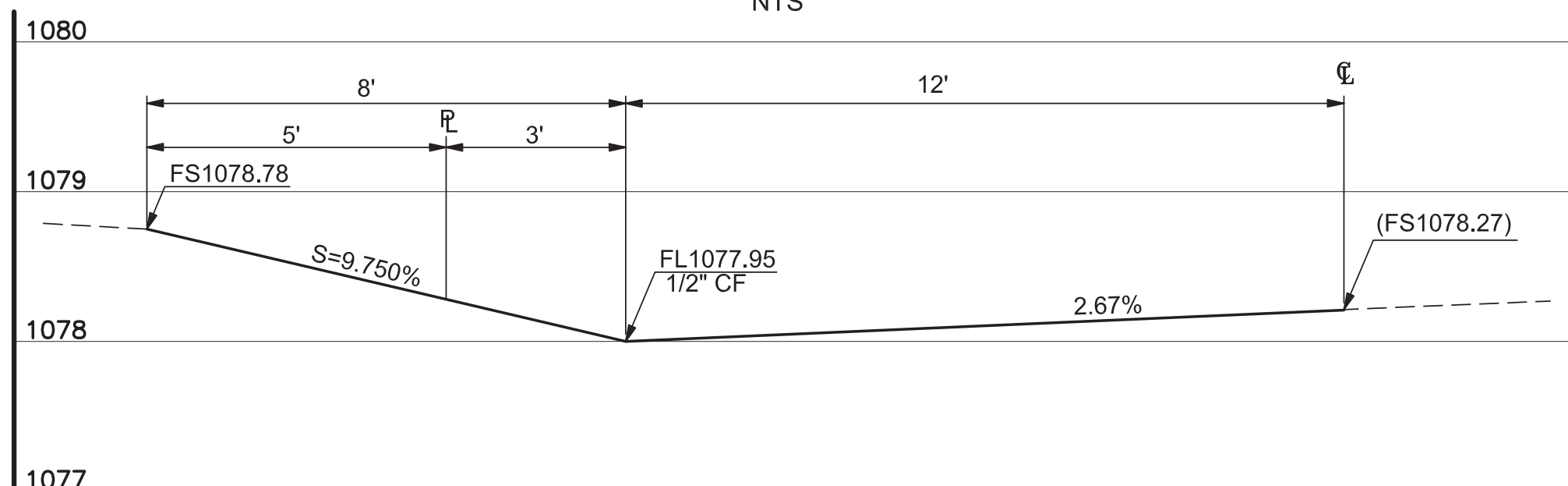
- HOUSE CONNECTION EXTENSION: BEFORE CONSTRUCTION TO EXTEND THE EXISTING HOUSE CONNECTION LATERAL AT SEWER STATION 1 + 33, THE HOUSE CONNECTION SHALL BE CCTV'D TO DETERMINE SUFFICIENCY TO ADEQUATELY CONVEY FLOW. DETERMINATION SHALL BE MADE BY AND IN THE PRESENCE OF BUREAU OF CONTRACT ADMINISTRATION PERSONNEL. IF THE EXISTING LATERAL IS FOUND TO BE DEFICIENT, IT SHALL BE REPAIRED OR LINED AS NECESSARY OR ABANDONED AND A NEW LATERAL, AS DETAILED BY ICA, SHALL BE CONSTRUCTED.
- CONTRACTOR SHALL OBTAIN SEPARATE HOUSE CONNECTION PERMIT FROM SEWER COUNTER LOCATED AT 201 N FIGUEROA ST, 3RD FLOOR TO THE START OF STREET PAVEMENT CONSTRUCTION AS SHOWN ON PLAN.
- ALL SEWER MANHOLES SHOWN HEREON TO BE ADJUSTED TO GRADE SHALL BE ADJUSTED TO FINISHED GRADE IN ACCORDANCE WITH CURRENT STANDARD PLAN S-137.

TYPICAL SECTION



STANLEY HILLS DR

STA. 0+41.70 TO 1+00.00
NTS



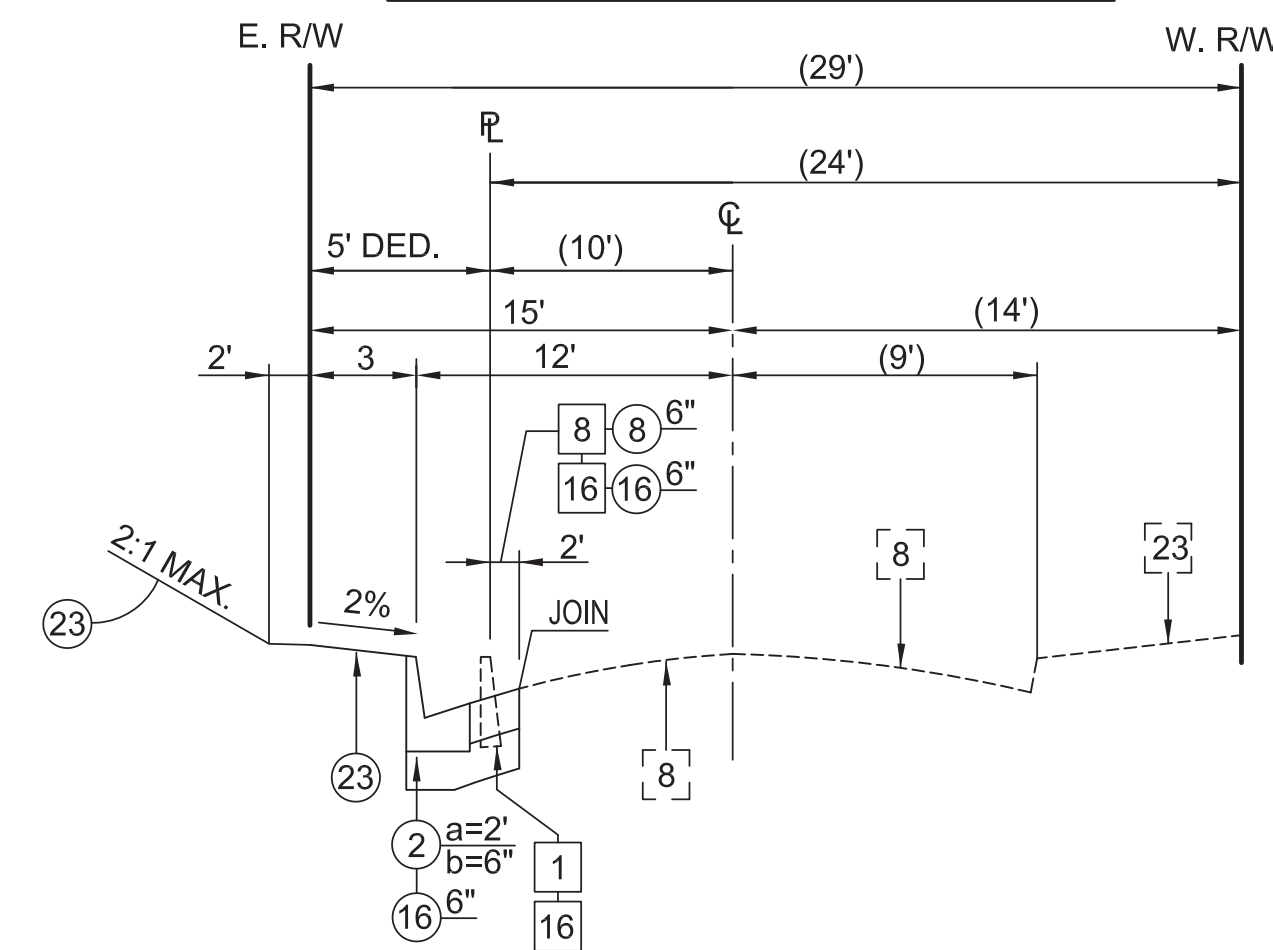
DRIVEWAY PROFILE

SCALE: HORIZ.: 1"=2' VERT.: 1"=1' STA.=0+93.64

CONSTRUCTION NOTES

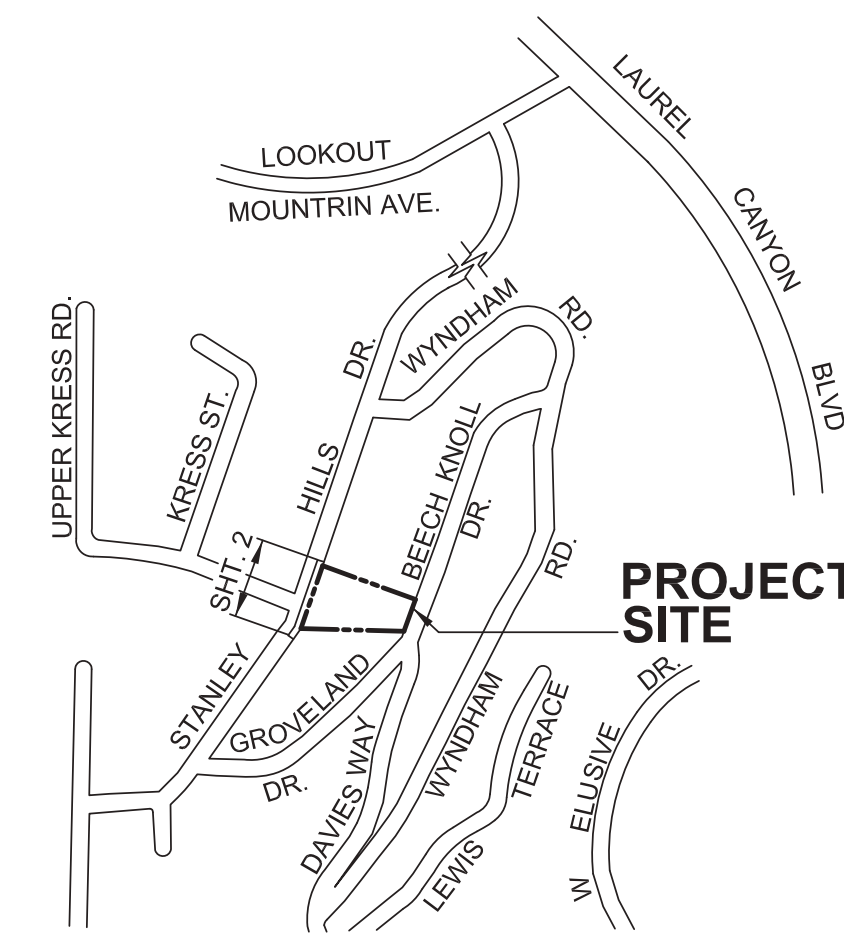
- | | | | |
|---|-----------|---|-----------------|
| ○ | CONSTRUCT | ○ | REMODEL EXIST. |
| □ | EXISTING | □ | REMOVE & CONST. |
| □ | REMOVE | ○ | WORK BY OTHERS |
- CONCRETE CURB TYPE A
 - TYPE C INTEGRAL CURB & GUTTER a=b= AS NOTED
 - TYPE C INTEGRAL CURB & PAVEMENT a=b= AS NOTED
 - CONCRETE PAVEMENT
 - CONCRETE DRIVEWAY
 - ASPHALT CONCRETE BERM
 - UNTREATED BASE MATERIAL CMB 4" OR 6" AS NOTED
 - GRADE ONLY
 - SAW CUT AND JOIN
 - EX. RETAINING WALL
 - HOUSE CONNECTION SEWER

TYPICAL SECTION



STANLEY HILLS DR

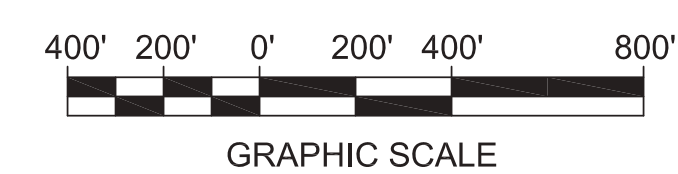
STA. 1+00.00 TO 1+68.31
NTS



KEY MAP

SCALE: 1"=400'

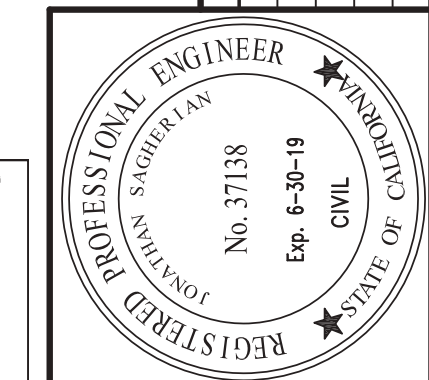
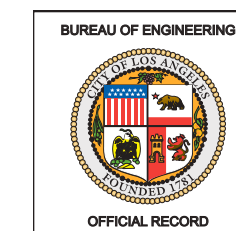
AS BUILT



SHT NO	PLANS OF	FROM	TO
1	TITLE SHEET		
2	STREET STANLEY HILLS DR	N. STANLEY HILLS DR	E/O KRESS ST.

INDEX TO SHEETS

BUREAU OF ENGINEERING ENGINEERING CITY OF LOS ANGELES B. PERMITS BR003786 INDEX NO. P-38421	DATE: BY: WORK ACCEPTED DATE: BY: APPROVALS: SURVEY CENTRAL DATE: BY:	REFERENCES: DISTRICT MAP 147A209 DRAINAGE MAP 468 NAVD 1988 2000 ADJ.	BASIS: B.M.# 13-19438 - CITY OF L.A. P.B.M. STMPD 13-19438 1970' - 1.5 FT E OF E CURB LINE LAUREL CANYON BLVD. ABOUT 75 FT N OF EC OF CURVE 0.07 MI N OF JOVENTA CANYON DR. 79 FT N OF CONC RET. WALL AT END OF CHANNEL, N END CB.	BENCH MARKS: B.M.# 13-19508 - CITY OF L.A. P.B.M. STMPD 13-19508 1970' - IN NW CORNER, 1.5 FT NW OF CURB LINE, OF LAUREL CANYON BLVD & LOOKOUT MOUNTAIN AVE. 12.5 FT N OF CURB RETURN BC W OF LAUREL CANYON BLVD. N END OF CB.	DEPARTMENT OF PUBLIC WORKS GARY LEE MOORE, P.E. CITY ENGINEER ACCEPTED BY: <i>Zaneta Gibrault</i> PLAN CHECKER DATE: 02/28/2018 DATE: 3/9/18 DIVISION / DISTRICT ENGINEER
--	---	---	---	---	--



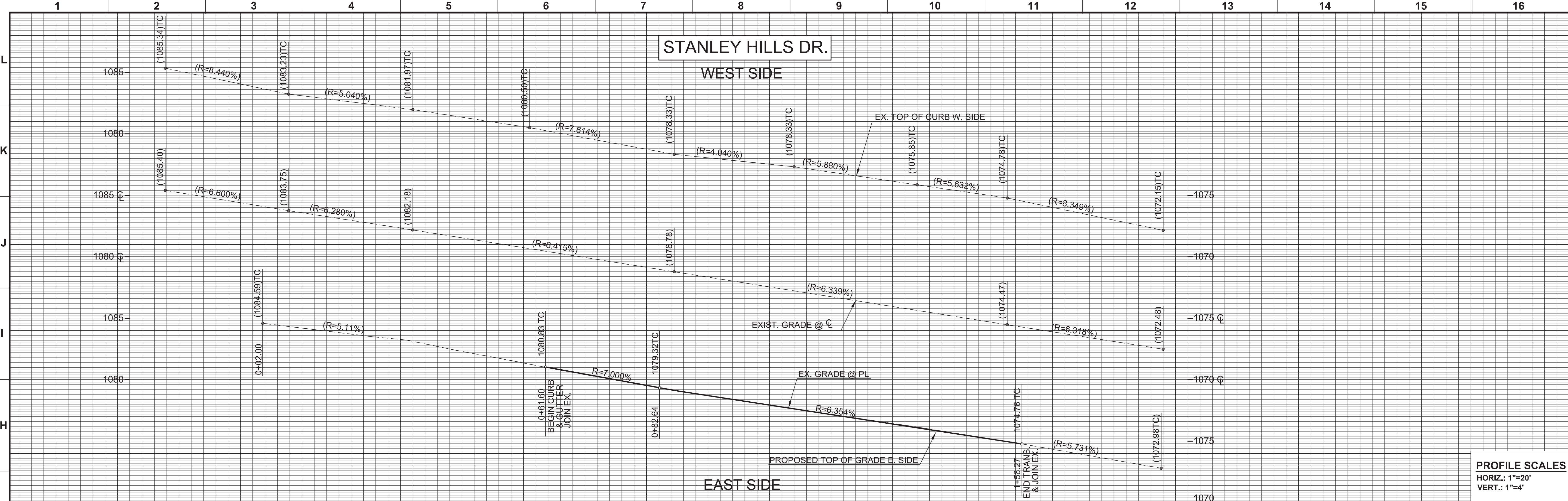
PLANS PREPARED BY:
JK ASSOCIATES, INC.
 CIVIL ENGINEERING
 1295 LOS ANGELES ST. BLDG. #4, GLENDALE, CA 91204
 TEL: (818) 507-8861 FAX: (818) 507-8882

ZA-2014-1621-ZAD-ZAA-1A

SHEET TITLE: PROJECT: ADDRESS:	NOTES, KEY MAP AND SECTION N. STANLEY HILLS DRIVE E/O KRESS ST. ZAA-2014-1621-ZAD-ZAA-1A 2104 STANLEY HILLS DRIVE LOS ANGELES, CA 90046
DRAWING NO.	1
SHEET 1 OF 2 SHEETS	

THE CITY OF LOS ANGELES OR ITS OFFICERS OR AGENTS SHALL NOT BE RESPONSIBLE FOR THE ACCURACY OR COMPLETENESS OF ELECTRONIC COPIES OF THIS PLAN SHEET.

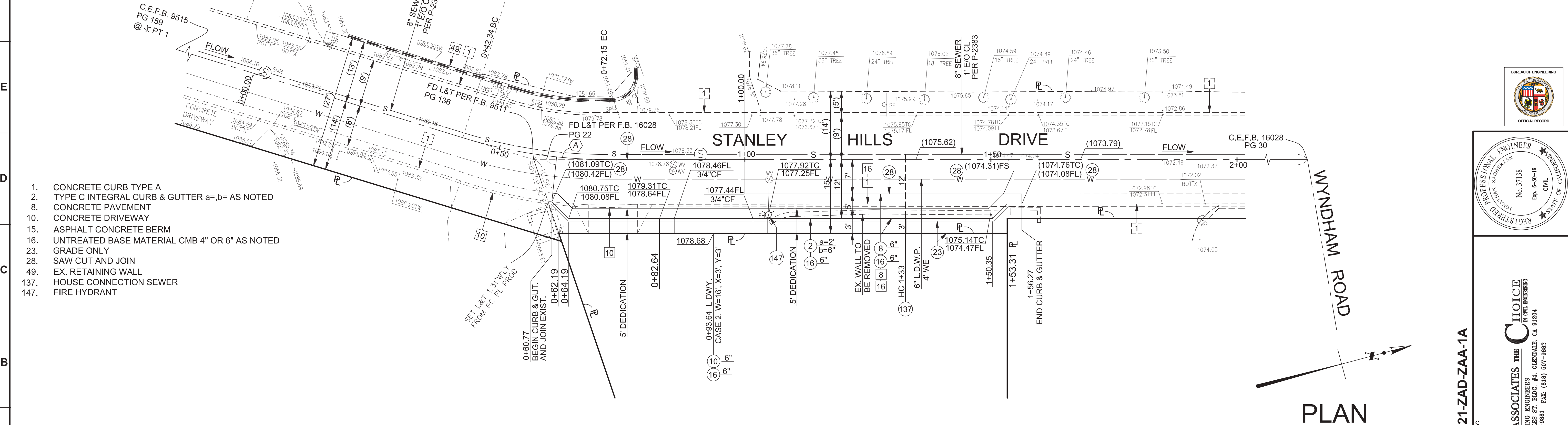
REVISIONS ENTERED (DESIGN STAGE ONLY)



PROFILE SCALES
 HORIZ.: 1"=20'
 VERT.: 1"=4'

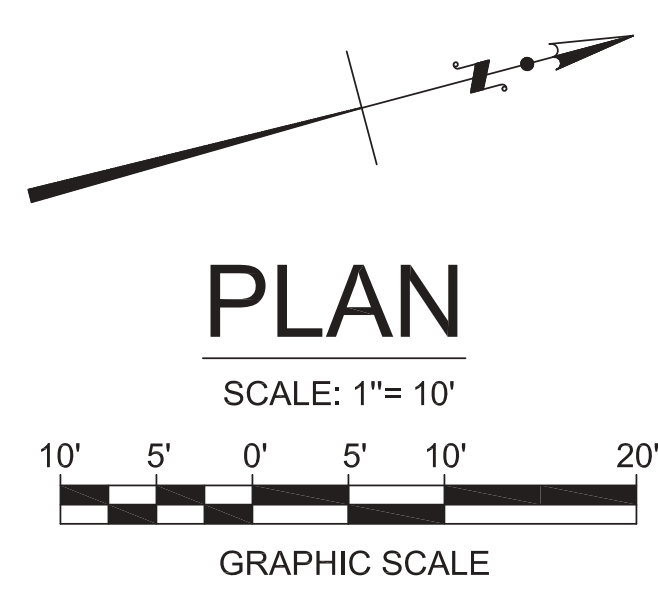
CONSTRUCTION SYMBOLS

- CONSTRUCT
- EXISTING
- REMOVE
- REMODEL EXIST.
- REMOVE & CONST.
- WORK BY OTHERS



1. CONCRETE CURB TYPE A
2. TYPE C INTEGRAL CURB & GUTTER a=b AS NOTED
8. CONCRETE PAVEMENT
10. CONCRETE DRIVEWAY
15. ASPHALT CONCRETE BERM
16. UNTREATED BASE MATERIAL CMB 4" OR 6" AS NOTED
23. GRADE ONLY
28. SAW CUT AND JOIN
49. EX. RETAINING WALL
137. HOUSE CONNECTION SEWER
147. FIRE HYDRANT

CURVE DATA					
NO.	Δ	R	L	T	DESCRIPTION
(A)	17°07'58"	100.00'	29.90'	15.06'	CL



AS BUILT

THE CITY OF LOS ANGELES OR ITS OFFICERS OR AGENTS SHALL NOT BE RESPONSIBLE FOR THE ACCURACY OR COMPLETENESS OF ELECTRONIC COPIES OF THIS PLAN SHEET.

BUREAU OF ENGINEERING

DATE: _____ BY: _____

NO. REVISIONS: _____

APPROVAL: _____

OFFICE: CENTRAL

CHECKED BY: _____

SIGNATURE: _____ DATE: 02/28/2018

WORK ACCEPTED: _____

INDEX NO. **P-38421**

B - PERMITS **BR003786**

DEPARTMENT OF PUBLIC WORKS

JK ASSOCIATES

DESIGN GROUP

ENGINEER: JONATHAN SAGHERIAN 2-12-18

DESIGNED BY: JONATHAN SAGHERIAN

DRAWN BY: RAMSIN KARAM 2-12-18

CHECKED BY: JONATHAN SAGHERIAN 2-12-18

APPROVED BY: JONATHAN SAGHERIAN 2-12-18

CITY OF LOS ANGELES

REGISTERED PROFESSIONAL ENGINEER

NO. 37138

EXP. 6-30-19

CIVIL

PLANS PREPARED BY:

JK ASSOCIATES THE CHOICE

CIVIL CONSULTING ENGINEERS

2285 LOS ANGELES ST. BLDG. #4 GLENDALE, CA 91204

TEL: (626) 307-9861 FAX: (626) 307-9882

PROJECT NO.

2

SHEET 2 OF 2 SHEETS

Sheet Version 6.0 2-2015

Exhibit 2.3
Photograph of Tow-Away No Stopping Any Time Signs Facing Southbound Traffic on Stanley
Hills Drive



Exhibit 2.3: Photograph of Tow-Away No Stopping Any Time Signs Facing Southbound Traffic on Stanley Hills Drive

Exhibit 2.4
Photograph of No Parking Red Flag Days Signs Facing Northbound Traffic on Stanley Hills
Drive



Exhibit 2.4: Photograph of No Parking Red Flag Days Signs Facing Northbound Traffic on Stanley Hills Drive

Exhibit 3.1
Photograph 1 of Electronic Level Taken Along the Segment of Stanley Hills Drive from
Station 0+10.65 to Station 1+64.43



Exhibit 3.1: Photograph 1 of Grade in Excess of 16 Percent Taken Along the Segment of Stanley Hills Drive from Station 0+10.65 to Station 1+64.43

Exhibit 3.2
Photograph 2 of Electronic Level Taken Along the Segment of Stanley Hills Drive from
Station 0+10.65 to Station 1+64.43



Exhibit 3.2: Photograph 2 of Grade in Excess of 16 Percent Along the Segment of Stanley Hills Drive from Station 0+10.65 to Station 1+64.43

Exhibit 3.3
Photograph 3 of Electronic Level Taken Along the Segment of Stanley Hills Drive from
Station 0+10.65 to Station 1+64.43



Exhibit 3.3: Photograph 3 of Electronic Level Taken Along the Segment of Stanley Hills Drive from Station 0+10.65 to Station 1+64.43

Exhibit 4.1
Screenshot from Sheet Index No. P-2383
Showing Curve that ends at Station 2+06.62

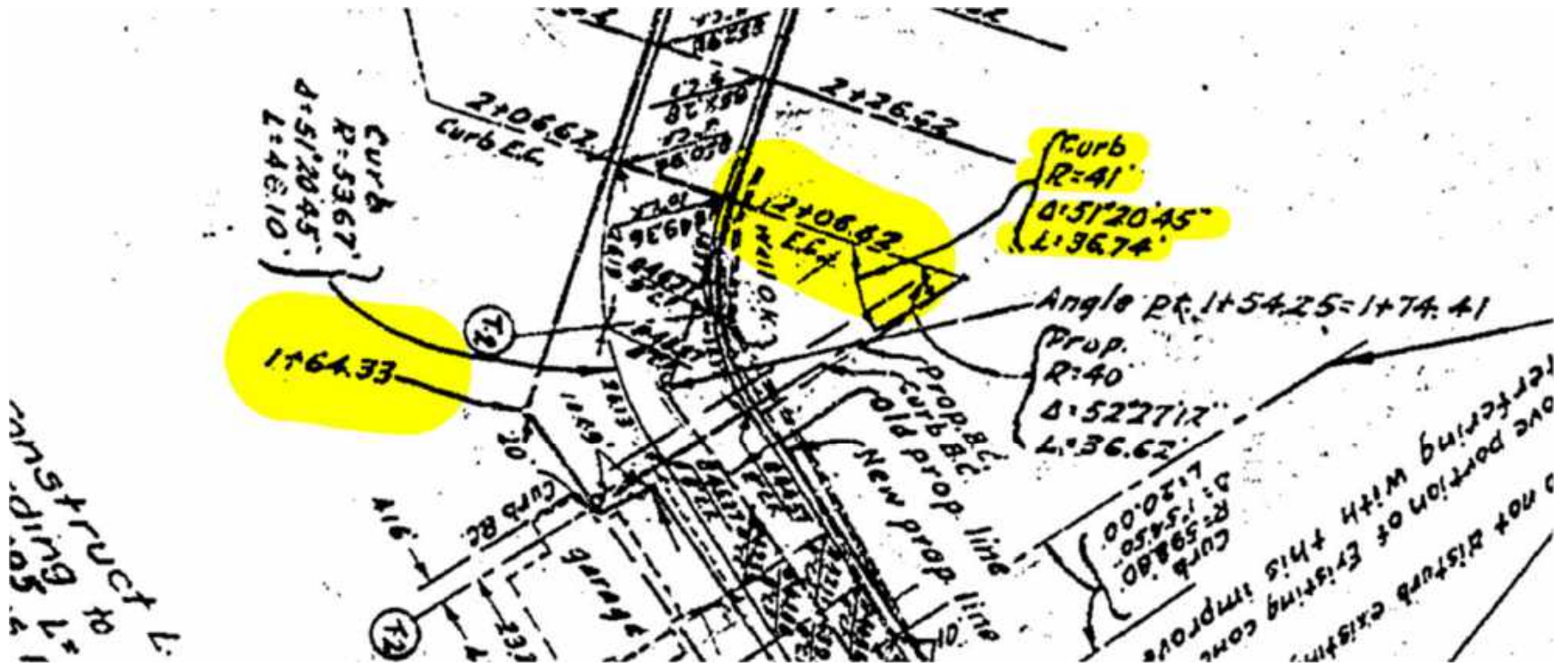


Exhibit 4.1: Screenshot from Sheet Index No. P-2383 Showing Curve That Ends at Station 2+06.62

Exhibit 4.2
Screenshot from Sheet Index No. P-2383
Showing Curve from Station 6+23.38 to Station 6+42.26

Exhibit 4.3
Screenshot from Sheet Index No. P-2383
Showing Curve from Station 25+73.73 to Station 26+25.18

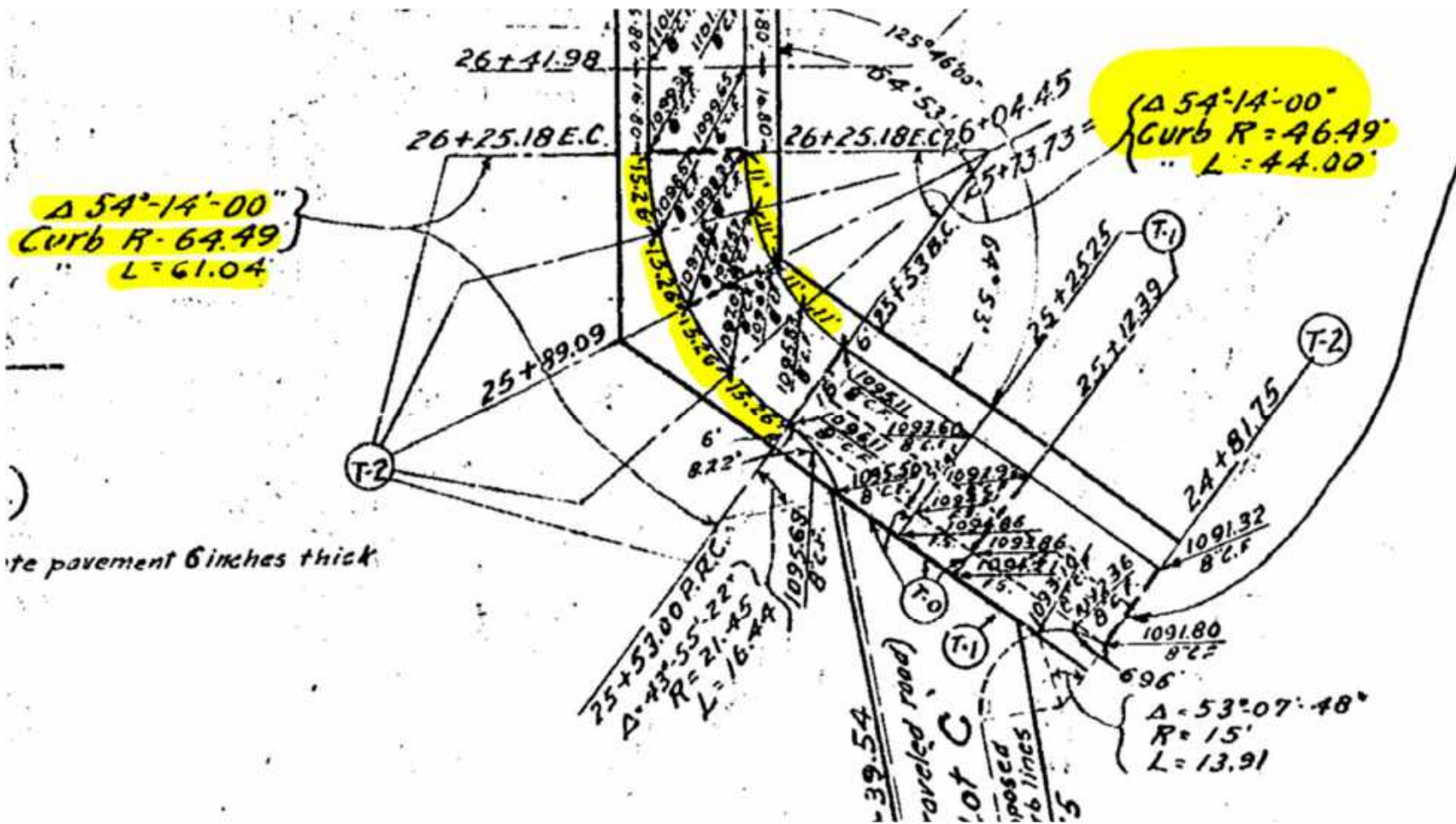


Exhibit 4.3: Screenshot from Sheet Index No. P-2383 Showing Curve from Station 25+53 to Station 26+25.18

November 3, 2025

Project Number 25-05

ATTACHMENT 2
State Minimum Fire Safe Regulations
Article 2, Ingress and Egress

California Code of Regulations

Title 14 Natural Resources

Division 1.5 – Department of Forestry and Fire Protection

Chapter 7 – Fire Protection

Subchapter 2 – State Minimum Fire Safe Regulations

Article 2 – Ingress and Egress

§ 1273.00 - Intent

§ 1273.01 - Width

§ 1273.02 - Road Surface

§ 1273.03 - Grades

§ 1273.04 - Radius

§ 1273.05 - Turnarounds

§ 1273.06 - Turnouts

§ 1273.07 - Road and Driveway Structures

§ 1273.08 - Dead-End Roads

§ 1273.09 - Gate Entrances

§ 1273.00 - Intent

Roads, and Driveways, whether public or private, unless exempted under 14 CCR § [1270.03\(d\)](#), shall provide for safe access for emergency Wildfire equipment and civilian evacuation concurrently, and shall provide unobstructed traffic circulation during a Wildfire emergency consistent with 14 CCR §§ [1273.00](#) through [1273.09](#).

§ 1273.01 - Width

(a) All roads shall be constructed to provide a minimum of two ten (10) foot traffic lanes, not including shoulder and striping. These traffic lanes shall provide for two-way traffic flow to support emergency vehicle and civilian egress, unless other standards are provided in this article or additional requirements are mandated by Local Jurisdictions or local subdivision requirements. Vertical clearances shall conform to the requirements in California Vehicle Code section 35250.

(b) All One-way Roads shall be constructed to provide a minimum of one twelve (12) foot traffic lane, not including Shoulders. The Local Jurisdiction may approve One-way Roads.

(1) All one-way roads shall, at both ends, connect to a road with two traffic lanes providing for travel in different directions, and shall provide access to an area currently zoned for no more than ten (10) Residential Units.

(2) In no case shall a One-way Road exceed 2,640 feet in length. A turnout shall be placed and constructed at approximately the midpoint of each One-way Road.

(c) All driveways shall be constructed to provide a minimum of one (1) ten (10) foot traffic lane, fourteen (14) feet unobstructed horizontal clearance, and unobstructed vertical clearance of thirteen feet, six inches (13' 6").

§ 1273.02 - Road Surface

(a) Roads shall be designed and maintained to support the imposed load of Fire Apparatus weighing at least 75,000 pounds, and provide an aggregate base.

(b) Road and Driveway Structures shall be designed and maintained to support at least 40,000 pounds.

(c) Project proponent shall provide engineering specifications to support design, if requested by the Local Jurisdiction.

§ 1273.03 - Grades

- (a) At no point shall the grade for all Roads and Driveways exceed 16 percent.
- (b) The grade may exceed 16%, not to exceed 20%, with approval from the Local Jurisdiction and with mitigations to provide for Same Practical Effect.

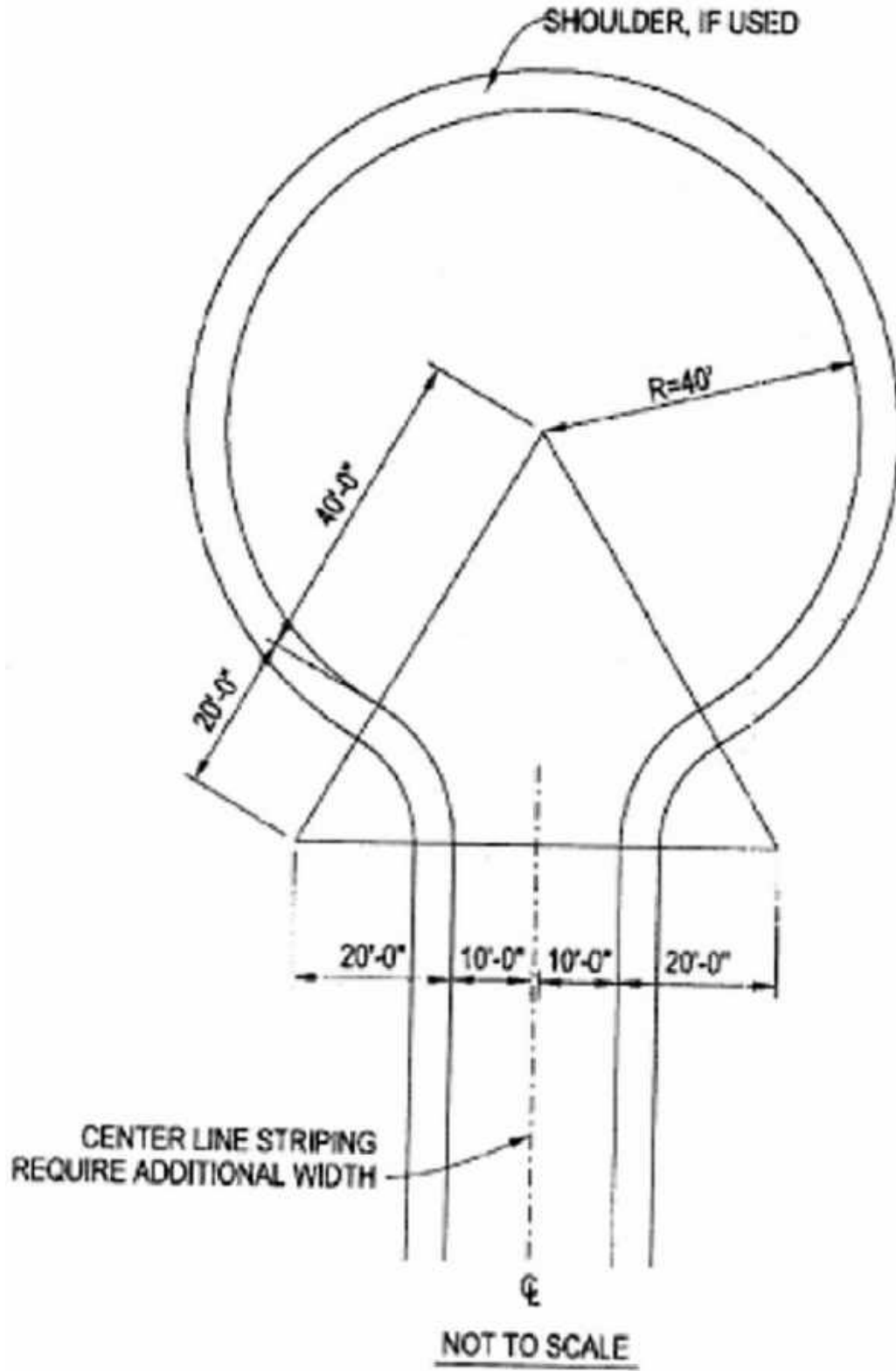
§ 1273.04 – Radius

- (a) No Road or Road Structure shall have a horizontal inside radius of curvature of less than fifty (50) feet. An additional surface width of four (4) feet shall be added to curves of 50-100 feet radius; two (2) feet to those from 100-200 feet.
- (b) The length of vertical curves in *Roadways*, exclusive of gutters, ditches, and drainage structures designed to hold or divert water, shall be not less than one hundred (100) feet.

§ 1273.05 – Turnarounds

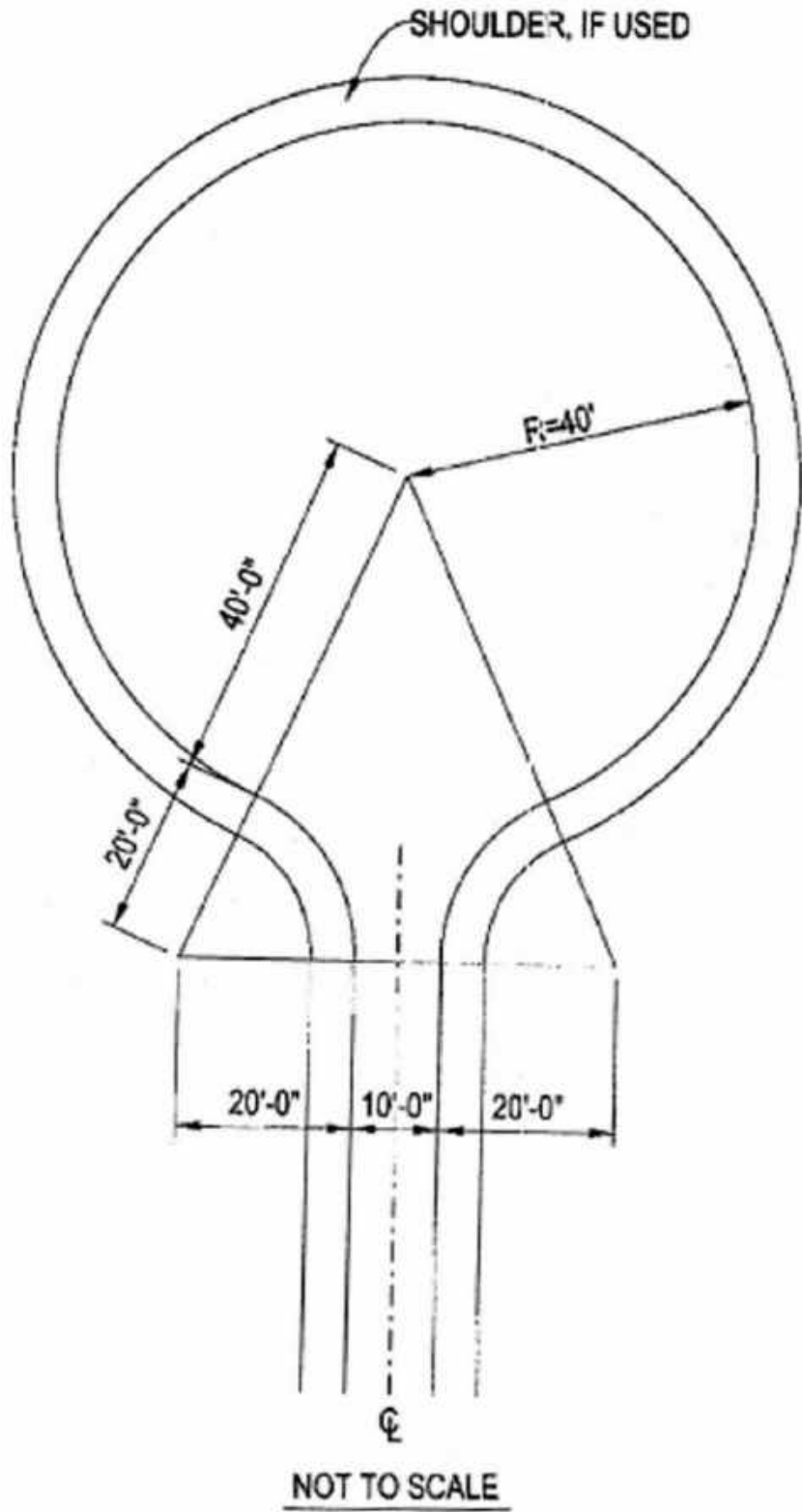
- (a) Turnarounds are required on Driveways and Dead-end Roads.
- (b) The minimum turning radius for a turnaround shall be forty (40) feet, not including parking, in accordance with the figures in 14 CCR §§ [1273.05\(e\)](#) and [1273.05\(f\)](#). If a hammerhead/T is used instead, the top of the "T" shall be a minimum of sixty (60) feet in length.
- (c) Driveways exceeding 150 feet in length, but less than 800 feet in length, shall provide a turnout near the midpoint of the Driveway. Where the driveway exceeds 800 feet, turnouts shall be provided no more than 400 feet apart.
- (d) A turnaround shall be provided on Driveways over 300 feet in length and shall be within fifty (50) feet of the building.
- (d) Each Dead-end Road shall have a turnaround constructed at its terminus. Where parcels are zoned five (5) acres or larger, turnarounds shall be provided at a maximum of 1,320 foot intervals.

(e) Figure A. Turnarounds on roads with two ten-foot traffic lanes.
Figure A/Image 1 is a visual representation of paragraph (b).



(f) Figure B. Turnarounds on driveways with one ten-foot traffic lane.

Figure B/Image 2 is a visual representation of paragraph (b).



§ 1273.06 – Turnouts

Turnouts shall be a minimum of twelve (12) feet wide and thirty (30) feet long with a minimum twenty-five (25) foot taper on each end.

§ 1273.07 - Road and Driveway Structures

- (a) Appropriate signing, including but not limited to weight or vertical clearance limitations, One-way Road or single traffic lane conditions, shall reflect the capability of each bridge.
- (b) Where a bridge or an elevated surface is part of a Fire Apparatus access road, the bridge shall be constructed and maintained in accordance with the American Association of State and Highway Transportation Officials Standard Specifications for Highway Bridges, 17th Edition, published 2002 (known as AASHTO HB-17), hereby incorporated by reference. Bridges and elevated surfaces shall be designed for a live load sufficient to carry the imposed loads of fire apparatus. Vehicle load limits shall be posted at both entrances to bridges when required by the local authority having jurisdiction.
- (c) Where elevated surfaces designed for emergency vehicle use are adjacent to surfaces which are not designed for such use, barriers, or signs, or both, as approved by the local authority having jurisdiction, shall be installed and maintained.
- (d) A bridge with only one traffic lane may be authorized by the Local Jurisdiction; however, it shall provide for unobstructed visibility from one end to the other and turnouts at both ends.

§ 1273.08 - Dead-End Roads

(a) The maximum length of a Dead-end Road, including all Dead-end Roads accessed from that Dead-end Road, shall not exceed the following cumulative lengths, regardless of the number of parcels served:

- parcels zoned for less than one acre - 800 feet
- parcels zoned for 1 acre to 4.99 acres - 1,320 feet
- parcels zoned for 5 acres to 19.99 acres - 2,640 feet
- parcels zoned for 20 acres or larger - 5,280 feet

All lengths shall be measured from the edge of the Road surface at the intersection that begins the Road to the end of the Road surface at its farthest point. Where a dead-end road crosses areas of differing zoned parcel sizes requiring different length limits, the shortest allowable length shall apply.

(b) See 14 CCR § [1273.05](#) for dead-end road turnaround requirements.

§ 1273.09 - Gate Entrances

- (a) Gate entrances shall be at least two (2) feet wider than the width of the traffic lane(s) serving that gate and a minimum width of fourteen (14) feet unobstructed horizontal clearance and unobstructed vertical clearance of thirteen feet, six inches (13' 6").
- (b) All gates providing access from a Road to a Driveway shall be located at least thirty (30) feet from the roadway and shall open to allow a vehicle to stop without obstructing traffic on that Road.

(c) Where a One-way Road with a single traffic lane provides access to a gated entrance, a forty (40) foot turning radius shall be used.

(d) Security gates shall not be installed without approval. Where security gates are installed, they shall have an approved means of emergency operation. Approval shall be by the local authority having jurisdiction. The security gates and the emergency operation shall be maintained operational at all times.

November 3, 2025

Project Number 25-05

ATTACHMENT 3
Brandon Araujo's Resume

BRANDON J. ARAUJO, P.E.
(626) 252-1523
brjaraujo@gmail.com

EDUCATION:

Stanford University, Master of Science, Structural Engineering & Geomechanics, June 2008

Stanford University, Bachelor of Science, Civil & Environmental Engineering, June 2007

EXPERIENCE:

City of Hermosa Beach, Senior Engineer, Hermosa Beach, CA (05/2024 – PRESENT)

- Project Manager for the complex, multi-agency Greenwich Village Underground Utility Assessment District.
- Prepared, reviewed, interpreted, analyzed, and modified engineering plans, drawings, specifications, contract documents, and engineering reports for conformance to professional standards and approved budgets.
- Possessed excellent organizational skills and ability to manage multiple projects with competing deadlines.
- Administered the Bid & Award phase of projects: issued Notice Inviting Bids, responded to questions, evaluated bids, and recommended project award. Administered contracts after award. Ensured Contractor compliance with the City's contract documents.
- Applied for outside funding for City projects; administered funding and followed reporting requirements as needed. Prepared requests for reimbursement and administered grant funds.
- Coordinated assigned activities with other divisions, departments, and outside agencies; attended and participated in professional group meetings.
- Prepared staff reports, and presentation materials, for City Council
- Assisted with, planning, budgeting, and administration of the city-wide Capital Improvement Program, Public Works operating budget, and associated projects.
- Responded to, and resolved, difficult inquiries and complaints from the property owners, contractors, and others regarding Public Works projects and activities.
- Responded to questions and inquiries from a variety of sources regarding department functions.
- Communicated clearly and concisely, both orally and in writing; and established and maintained effective working relationships with those contacted in the course of work.

City of Los Angeles, Bureau of Engineering, Civil Engineer, Los Angeles, CA (02/2022 – 05/2024)

- Project Manager of a variety of complex Capital Improvement Projects, planned, directed, and coordinated, through subordinates, a variety of complex professional civil engineering assignments related to the delivery of a project portfolio with a construction value of over \$100,000,000.
- Served as the project manager on complex Capital Improvement Projects.
- Managed the preparation and performed technical reviews of engineering plans, specifications, construction estimates, and construction bid documents for public works projects.
- Prepared, reviewed, interpreted, analyzed, and modified engineering plans, drawings, specifications, contract documents, and engineering reports for conformance to professional standards and approved budgets.
- Supervised the preparation of special engineering studies and prepared technical reports.
- Possessed excellent organizational skills and the demonstrated the ability to manage multiple projects with competing deadlines.
- Lead, mentored, reviewed, and monitored the work of staff responsible for performing professional engineering work.
- Directed and supervised the technical and administrative work of consultants. Ensured consultant compliance with City standards, specifications, and budget.

- Recommended procedural improvements and modifications.
- Prepared the Bureau's manual on the administration of special assessment and improvement districts.
- Responded to, and resolved, difficult inquiries and complaints from contractors regarding Public Works projects and activities.
- Communicate clearly and concisely, both orally and in writing; and establish and maintain effective working relationships with those contacted in the course of work.

City of Los Angeles, Department of Transportation, Los Angeles, CA (11/2019 – 02/2022)

Transportation Engineer (11/2021-02/2022)

- Transportation Engineer for Vision Zero's Safety Engineering group.
- Worked on implementing lower speed limits throughout the City in response to AB43
- Worked on various policies, programs, and projects to reduce the number of people killed or severely injured in automobile collisions in the City.

Transportation Engineering Associate II (11/2019-11/2021)

- Member of the Metro Programs Division—a one-stop, on-demand service dedicated solely to the Department's review of all of Metro's capital improvement programs within City limits.
- Reviewed, checked, verified, and critiqued the technical validity of Metro's plans to remove and replace all of their transportation system's red light enforcement cameras.
- Communicated effectively, both orally and in writing, with Metro to report the City's findings, explain our positions, and respond to their questions, comments, or concerns.

City of Vernon, Project Engineer, Vernon, CA (12/2016 – 11/2019)

- Performed complex professional engineering duties involved in the design and development of the federally-funded Atlantic Boulevard Bridge Widening over the Los Angeles River.
- Prepared, reviewed, interpreted, analyzed, and modified engineering plans, drawings, specifications, contract documents, and engineering reports for conformance to professional standards and approved budgets.
- Possessed excellent organizational skills and ability to manage multiple projects with competing deadlines.
- Issued grading and storm drain permits for private developments as required and ensured compliance and conformance with scope of work standards and specifications. Performed inspection of work in the field by contractors and developers for the City's grading and storm drain permits.
- Performed the development, advertising, and selection process for professional services. Evaluated proposals and recommended project award. Negotiated and administered contracts after award. Ensured consultant compliance with City standards, specifications, and budget.
- Applied for outside funding for City projects; administered funding and followed reporting requirements as needed. Prepared and administered grant funds.
- Coordinated assigned activities with other divisions, departments, and outside agencies; attended and participated in professional group meetings.
- Prepared staff reports, and presentation materials, for City Council, Vernon Business and Industry Commission, and other public meetings and represented the City as required.
- Assisted with, planning, budgeting, and administration of the city-wide Capital Improvement Program, Public Works operating budget, and associated projects.
- Responded to, and resolved, difficult inquiries and complaints from the property owners, contractors, and others regarding Public Works projects and activities.
- Responded to questions and inquiries from a variety of sources regarding department functions.

- Communicated clearly and concisely, both orally and in writing; and established and maintained effective working relationships with those contacted in the course of work.

Orange County Public Works, Santa Ana, CA (9/2011 – 12/2016)

Civil Engineer (9/2015-12/2016)

- Planned, laid out, directed, reviewed, and controlled the work of a group of engineering staff.
- Supervised, trained, and evaluated subordinate personnel.
- Supervised the preparation of the temporary traffic control and detour plans for the slurry sealing of all of the collectors and arterial highways within Ladera Ranch.
- Responsible for the Traffic Engineering department's review and approval of the 4.75-mile-long extension of the 241 Toll Road.
- Responsible for the department's review and approval of street improvement plans prepared for arterial and collector streets in new planned communities.
- Initiated the hiring process for Temporary Extra-Help employees: advertised the position, evaluated resumes, interviewed potential candidates, and selected candidates.

Acting Senior Civil Engineer (5/2015-8/2015)

- As a part of a three-month temporary promotion, managed the Traffic Studies section of the Traffic Engineering Department.
- Planned, laid out, directed, reviewed, and controlled the work of a group of engineering staff to achieve organizational and project objectives in a timely manner.
- Coordinated the work of the Traffic Studies unit to review traffic studies, county property permits, street improvement plans, and signing and striping plans submitted to the Department for review and approval.
- Responsible for the Division's review of tentative tract maps prepared for new planned communities in south Orange County.

Civil Engineer (10/2012-5/2015)

- Prepared plans, specifications, and estimates for traffic-related items for the County's roadway capital improvement projects.
- Utilized close attention to detail in designing temporary traffic control during construction and permanent signing and striping.
- Conducted field inspections of temporary traffic control, signing, and striping.
- Responded to and resolved difficult complaints related to construction projects.
- Made presentations to the general public regarding construction projects.

REGISTRATION:

- Professional Civil Engineer, State of California (License #75996)
- Water & Wastewater Treatment Certificate, Loyola Marymount University
- Building Plans Examiner, International Code Council (Certificate #9703625)

TRAINING:

Geometric Design for California, Institute of Transportation Studies, UC Berkeley
Resident Engineers Academy, Local Technical Assistance Program, Caltrans

SKILLS: MicroStation, AutoCAD, Microsoft Project, SmartSheet, Microsoft Excel, Microsoft Word

November 3, 2025

Exhibit B

February 12, 2015

Central Area Planning Commission, City of Los Angeles
Office of the Planning Commission, Suite 272
200 North Spring Street
Los Angeles, CA 90012

Subject: Critique of the "Addendum (Reconsideration) Mitigated Negative Declaration (ENV-2013-2085-MND), Case No. ZA-2013-2087-ZAD-1A and ZA-2013-2084-ZAD-1A

Dear Members of the Central Area Planning Commission:

Pareto Planning and Environmental Services has prepared this comment letter at the request of Channel Law Group for Preserve L.A. Canyon Environments ("PLACE") which includes a number of the Stanley Hills Drive residents who commented on the Mitigated Negative Declaration for the proposed project. Pareto Planning is a small boutique environmental firm established in 2002. Pareto specializes in the preparation of environmental and planning documents. Services include preparation of Environmental Impact Reports and Mitigated Negative Declarations, preparation of comment letters for cities and community groups on environmental documents, provision of customized California Environmental Quality Act (CEQA) training for city staffs and planning commissioners, and provision of contract staffing services for cities and other planning and environmental firms.

I am the Principal of Pareto Planning and I have more than twenty-five years of experience preparing Environmental Impact Reports and Mitigated Negative Declarations. I have provided customized CEQA training to such cities as Beverly Hills, Santa Clarita and Pasadena, as well as to Planning Commissioners attending the Planner's Institute. I have prepared this comment letter following a visit to the project site, review of comments submitted on the Mitigated Negative Declaration and Addendum (Reconsideration) Mitigated Negative Declaration for the project, and a detailed review of the two Mitigated Negative Declarations prepared for this project.

1. INTRODUCTION

This project involves the expansion of a non-code conforming use at 2170/2172 Stanley Hills Drive, in the form of two vacant and dilapidated homes on an R1-1 parcel, and the construction of a new home at 2166 Stanley Hills Drive on a substandard lot. Despite numerous comments from the public and a State agency regarding the project's potential to result in significant impacts, the Zoning Administrator approved the project without requiring the preparation of an Environmental Impact Report (EIR).

As detailed in this comment letter, an EIR is required for the project. The standard for when an EIR is required is articulated in CEQA Guidelines Section 15064(f)(1), which states:

. . . if a lead agency is presented with a fair argument that a project may have a significant effect on the environment, the lead agency shall prepare an EIR even though it may also be presented with other substantial evidence that the project will not have a significant effect.

The City received detailed comments on the two Mitigated Negative Declarations prepared for the project. The commenters have provided the City with a fair argument supported by substantial evidence that the project will result in significant adverse impacts, triggering the need for an EIR.

This need for an EIR is not cured by the City's recirculated Mitigated Negative Declaration, which fails to present substantial evidence that the project will not have a significant effect. Most of the impact judgments contained in the Mitigated Negative Declarations are not supported by substantial evidence and the Mitigated Negative Declarations lack substantial evidence that the mitigation measures will reduce impacts to a level that is clearly less than significant, or that they are feasible.

To aide you in an understanding of the defects in the Mitigated Negative Declarations for the project and why an EIR is required, the following sections of this letter detail the key defects in the Mitigated Negative Declaration for the project:

2. Project History
3. Violation Of CEQA Guidelines Sections 15063(D)(1) And 15071 – Inadequate, Incomplete And/Or Inaccurate Project Description
4. Violation Of CEQA Guidelines Section 15063(D)(2) – Inadequate Description Of The Environmental Setting
5. Violation Of CEQA Guidelines Section 15063(D)(5) – Failure To Include A Discussion Of Project's Consistency With Applicable Land Use Controls
6. Violation Of CEQA Guidelines Section 15063, 15064 And 15070(A) – Lack Of Substantial Evidence Supporting Impact Judgments In The Initial Study

7. Violation Of CEQA Guidelines Section 15070(B)(1) – Lack Of Evidence Mitigation Measures Would Avoid The Effects Or Mitigate Effects To The Point Where Clearly No Significant Effects Would Occur
8. Violation Of CEQA Guidelines Section 15070(B)(1) - Improper Deferral Of Mitigation
9. Violation Of CEQA Guidelines Section 15070(B)(1) - Infeasible Mitigation Measures
10. Violation Of CEQA Guidelines Section 15074(D) – Failure To Adopt A Mitigation Monitoring Program
11. Violation Of CEQA Guidelines Section 15074(D) – Legitimate Concerns Regarding Enforcement Of Mitigation Measures
12. Violation Of Violation Of CEQA Guidelines Section 15074(D) And Guidelines Section 15070(B)(2) – There Is Substantial Evidence In The Record That The Project As Revised May Have A Significant Effect On The Environment
13. Need To Evaluate Alternatives
14. Conclusion – The City Of Los Angeles Has Violated CEQA Guidelines Section 15073.5(D) – An EIR Is Required When There Is Substantial Evidence That The Project May Have A Significant Impact

2. PROJECT HISTORY

2.1 Project Application

On July 2, 2013 the applicant submitted a Master Land Use Permit Application for 2170 and 2172 Stanley Hills Drive (ZA 2013-2084). The same applicant submitted a separate application for the adjacent parcel, 2166 Stanley Hills Drive (ZA-2013-2087) (see Attachment A).

2.2 Mitigated Negative Declaration (MND)- ENV-2013-2085

A Mitigated Negative Declaration (MND) for the proposed project was completed on April 2, 2014. According to the City's website, publication of a notice of availability of the MND was published in the Los Angeles Times on March 13, 2014 (see Attachment B). The notice indicated that the public comment period would end on April 2, 2014.

The MND consisted of:

- A Proposed Mitigated Negative Declaration Cover Sheet dated April 2, 2014¹ with a list of 21 mitigation measures:
 - III-10 Air Pollution (Demolition, Grading, and Construction Activities)

¹ Oddly the MND Cover Sheet is dated April 2, 2014, but the document was noticed for public comment on March 13, 2014.

- IV-10 Habitat Modification (Nesting Native Birds, Hillside or Rural Areas)
- IV-50 Tree Report
- IV-70 Tree Removal (Non-Protected Trees)
- VI-Seismic
- VI-20 Erosion/Grading/Short-Term Construction Impacts
- VI-30 Erosion/Grading/Short-Term Construction Impacts (Hillside Grading Areas)
- VI-50 Geotechnical Report
- VI-60 Landslide Area
- VII-10 Green House Gas Emissions
- VIII-10 Explosion/Release (Existing Toxic/Hazardous Construction Materials)
- VIII-70 Emergency Evacuation Plan
- IX-20 Stormwater Pollution (Demolition, Grading, and Construction Activities)
- XII-20 Increased Noise Levels (Demolition, Grading, and Construction Activities)
- XIV-10 Public Services (Fire)
- XVII-10 Utilities (Local Water Supplies – Landscaping)
- XVII-20 Utilities (Local Water Supplies – All New Construction)
- XVII-40 Utilities (Local Water Supplies – New Residential)
- XVII-90 Utilities (Solid Waste Recycling)
- XVII-100 Utilities (Solid Waste Disposal)

Despite the need for fairly extensive mitigation, the City elected not to prepare an EIR for the project.

- An Initial Study Checklist and discussion of the environmental evaluation dated 3/6/2014. The Initial Study identified 17 “potentially significant impacts unless mitigation incorporated”, in the following issue areas:
 - Air Quality
 - Biological Resources
 - Geology and Soils
 - Green House Gas Emissions
 - Hazards and Hazardous Materials
 - Hydrology and Water Quality
 - Noise
 - Public Services
 - Transportation/Traffic
 - Utilities and Services Systems
- Separate Geology and Soils Report Approval Letters for 2166 Stanley Hills Drive and for 2170/2172 Stanley Hills Drive dated April 3, 2013 and May 4, 2012, respectively.² The letter for 2166 Stanley Hills Drive identifies an additional 31 mitigation measures. The letter for 2170/2172 Stanley Hills Drive identifies 37 mitigation measures.

² Oddly the Geology and Soils Report Approval Letter pre-dates the Master Land Use Permit Applications.

As detailed in Section 6 of this letter, the evaluation of environmental impacts contained in the MND was largely conclusionary in nature, was not supported by substantial evidence, and violated the City's own instructions for evaluating environmental impacts contained on pages 8-9 of the MND.

The City received a total of 26 letters from the public on the project application and MND during the public comment period and a 27th letter from the Santa Monica Mountains Conservancy.³ These comments provided substantial evidence of additional unmitigated impacts.

2.3 June 12, 2014 Hearing

A public hearing was held on the applications on June 12, 2015. A copy of the hearing notices are included in Attachment B. The hearing was attended by the applicant, the applicant's representatives, residents in the area, and representatives of the Bel Air-Beverly Crest Neighborhood Council, Laurel Canyon Association, and Council District 4. Eight residents spoke in opposition to the project and provided additional comments on potential unmitigated impacts. The representative of Council District 4 also expressed concerns regarding the project.

2.4 Recirculated Mitigated Negative Declaration (RMND) – ENV-2013-2085 (REC1)

In response to public comments, on July 7, 2014 the Department of City Planning issued an "Addendum (Reconsideration) of the previously issued Mitigated Negative Declaration (ENV-2013-2085-MND)," hereafter referred to as the RMND. According to the City's website, publication of a notice of availability of the RMND was published in the Los Angeles Times on Thursday, July 17, 2014 (see Attachment B). The notice indicated that the public comment period would end on August 6, 2014.

The RMND consisted of:

- A cover letter signed by Faisal Roble, Senior City Planner, dated July 7, 2014 which identified the following eight (8) additional mitigation measures which were added to the RMND in response to public comments, thus tacitly acknowledging that additional significant unmitigated impacts, and/or inadequacies in the mitigation measures included in the MND, were identified in comments on the MND:
 - IV-30 Wildlife Corridor
 - IV-100 Biological Resources
 - VIII-160 Inadequate Emergency Access
 - XIV-10 Public Services (Fire)
 - XIV-40 Public Service (Construction Activity Near Schools)
 - XIV-70 Public Services (Street Improvements Not Required by DOT)

³ All comments received on the MND and RMND are incorporated herein by reference and are available for review in the Environmental Review Section of the Planning Department in Room 750, 200 North Spring Street.

- XVI-60 Inadequate Emergency Access (Hillside Streets – Construction Activity)
- XVI-90 Safety Hazards
- An unchanged Proposed Mitigated Negative Declaration Cover Sheet dated April 2, 2014 with a list of the same 21 mitigation measures included in the MND.
- An unchanged Initial Study Checklist and environmental evaluation dated 3/6/2014.
- Unchanged Geology and Soils Report Approval Letters for 2166 Stanley Hills Drive and for 2170/2172 Stanley Hills Drive dated April 3, 2013 and May 4, 2012, respectively.

Despite the addition of eight new mitigation measures to the RMND, no changes were made to the wholly inadequate analysis or description of environmental impacts in the MND. The inadequacies in the discussion of environmental impacts included in the MND and RMND are detailed in Section 6, of this letter. Despite the provision of substantial evidence of additional impacts, and the need for additional mitigation measures, the City elected not to prepare an EIR for the project.

In deciding not to prepare an EIR for the project, the City also decided not to provide responses to the comments on the RMND or MND. One of the reasons why an EIR is required, when a fair argument supported by substantial evidence of impacts is provided, is so that comments received on the environmental document will receive proper consideration through the requirement to provide responses to comments received on an EIR.⁴ Neither the RMND presented to the Zoning Administrator, nor the Zoning Administrator's subsequent Determination, provide any detailed description of the disposition of the significant environmental issues raised, or any detail as to why specific comments and suggestions were not accepted.

2.5 December 11, 2014 – Zoning Administrator's Determination (ZAD) and Approval of the Proposed Project

On December 11, 2014 the Zoning Administrator approved the proposed project: ZA-2013-2084(ZAD) and ZA-2013-2087(ZAD) and issued the following finding regarding the RMND:

On April 2, 2014, a Mitigated Negative Declaration (ENV 2013-2085-MND) was prepared for the proposed project. On July 7, 2014, an Addendum (Reconsideration) of the previously issued Mitigated Negative Declaration was issued and additional mitigation measures were identified. On the basis of the whole of the record before the lead agency including any comments received, the lead agency finds that with imposition of the mitigation measures described in the MND (and identified in this determination), there is no substantial evidence that the

⁴ CEQA Guidelines Section 15088.

proposed project will have a significant effect on the environment. I hereby adopt that action. This Mitigated Negative Declaration reflects the lead agency's independent judgment and analysis. The records upon which this decision is based are with the Environmental Review Section of the Planning Department in Room 750, 200 North Spring Street.

There is no evidence in the Zoning Administrator's determination that a Mitigation Monitoring and Reporting Program was adopted for the proposed project.

As detailed in the remainder of this letter, the RMND for the proposed project and the City's process violates CEQA in a number of ways, and the Zoning Administrator's finding that, with the imposition of the mitigation measures, there is no substantial evidence that the proposed project will have a significant impact, is not supported by substantial evidence.

3. VIOLATION OF CEQA GUIDELINES SECTIONS 15063(d)(1) and 15071 – INADEQUATE, INCOMPLETE AND/OR INACCURATE PROJECT DESCRIPTION

3.1 Failure to Describe the Whole of the Action – Omission Of Remodeling Component Of The Portion Of The Project At 2170/2072 Stanley Hills Drive

The RMND describes the project as:⁵

the construction, use and maintenance of a 470 square-foot addition to an existing 864 square-foot single-family dwelling at 2170 Stanley Hills Drive and a 782 square-foot addition to an existing 845 square-foot single-family dwelling at 2172 Stanley Hills Drive on a lot fronting onto a Substandard Hillside Limited Street where a minimum 20-foot wide continuous paved roadway does not provide vehicular access from the driveway apron to the boundary of the Hillside Area as required by Section 12.21- A, 17(e)(3) of the Code (Case No. ZA 2013-2084(ZAD)), and

the construction, use and maintenance of a new 2,060 square-foot single-family dwelling on a lot fronting onto a Substandard Hillside Limited Street where a minimum 20-foot wide continuous paved roadway does not provide vehicular access from the driveway apron to the boundary of the Hillside area as required by Section 12.21- A, 17(e)(3) of the Code (Case No. ZA 2013-2087(ZAD).)

However the Zoning Administrator's Determination describes the project approval for 2170-2172 Stanley Hills Drive as including remodeling of the two existing homes on the site.⁶

⁵ RMND page 1

⁶ ZA 2013-2084(ZAD), page 1

permit a remodeling of and an addition to two existing single-family dwellings on a lot that does not have a vehicular access route from the street, which is improved with a minimum 20-foot wide continuous paved roadway from the driveway apron to the edge of the boundary of the Hillside Area, as otherwise required by Section 12.21-C,10(i)(3) of the Municipal Code.

The ZAD further notes:⁷

The applicant purchased the property in late 2011 and proposes to remodel and add additional floor area to the existing dwellings. The existing dwelling in the front portion of the property at the 2172 Stanley Hills Drive address contains 845 square feet of floor area and an additional 782 square feet of floor area is proposed to be added resulting in a total of 1,627 square feet of floor area. The dwelling in the rear at the 2170 Stanley Hills Drive address contains 864 square feet of floor area and an additional 470 square feet of floor area is proposed to be added resulting in a total of 1,334 of square feet.

As noted by the applicant, the “the subject property has been vacant since 2000” and “existing dwelling units on site are in extreme disrepair and are an eyesore to the neighborhood.”⁸ According to the City’s Building and Safety Department Records, 2170 Stanley Hills Drive was subject of a 12/24/2007 code enforcement action for an “Abandoned or Vacant Building Left Open to the Public (see Attachment C). The enforcement action indicated that the building suffered from:

- Missing or inoperable plumbing fixtures.
- General dilapidation or improper maintenance as required by Section 91.8104.
- Deteriorated or ineffective waterproofing of walls, roof, foundations or floors.

There is no record in the City’s on-line system that the code violation was ever cured or that the City engaged in any follow-up regarding the identified violation, thus adding to neighborhood concerns regarding the City’s ability to enforce the required mitigation measures for the project. Not only is 2170 Stanley Hills Drive in a state of extreme disrepair, but so too is 2172 Stanley Hills Drive. There is thus evidence in the record that the two houses were abandoned and vacant since at least 2000.⁹

Additions to two homes, which are currently occupied and in good condition, have very different impacts than additions to unoccupied and uninhabitable structures that are in a state of extreme disrepair. The RMND not only fails to identify the remodeling of vacant and currently uninhabitable structures as a part of the project, the RMND fails to address the potential for impacts associated with the remodeling, rather than demolition and

⁷ ZA 2013-2084(ZAD), page 27

⁸ ZA 2013-2084(ZAD), page 22

⁹ In an April 3, 2014 comment letter addressed to Michael O’Brien from long-time Stanley Hills resident, Randy Dodge, Mr. Dodge testified that the two houses have in fact been empty since 1971.

reconstruction of the existing structures. The RMND therefore fails to address the whole of the action, in violation of CEQA Guidelines Section 15063(a)(1).

3.2 The RMND and Zoning Administrator Failed to Address the Feasibility of Remodeling – Whether the Project Includes Remodeling or Demolition and New Construction Affects the Zoning Consistency Determination

Both the Zoning Administrator and the RMND failed to address the question of whether remodeling of the existing structures at 2170/2172 Stanley Hills Drive is feasible. This determination is very important since the single parcel (APN 5567010009) containing 2170/2172 Stanley Hills is zoned R1-1;¹⁰ a second unit is therefore not allowed by the current zoning code.

The Zoning Administrator received testimony during the review process that the: “proposed renovation of an existing house is a fiction, since the house is falling down.”¹¹ Neighborhood residents raised the issue that the: “existing dwelling units on-site have been vacant for 14 years; therefore, the applicant does not have a non-conforming right to remodel the units as proposed.”¹² In response the ZAD states:¹³

A matter of the applicant's non-conforming right to remodel the existing dwelling units on site has been a contentious issue in the community. It should be noted that the determination as to whether or not the applicant has a non-conforming right to remodel and to make additions to the existing dwelling units is not under the purview of the subject application, and the subject grant is limited to allow a waiver of the required street improvement off-site.

The Zoning Administrator and the City have therefore failed to resolve a key question that affects the validity of the project description and the analysis of project impacts in the RMND. It is questionable whether remodeling of these structures is either feasible or desirable. According to the project plans, the rear home was built in 1923, and the front home was built in 1950. Seismic and foundation requirements have changed since these structures were built. According to the Geology and Soils Report Approval Letter attached to the RMND: “(w)henever the principal building on a site is added to, altered or repaired in excess of 50 percent of its replacement value, the entire site shall be brought up to the current Code standard. If this condition applies, a supplemental report identifying all non-conforming conditions shall be provided with recommendations to bring the entire site into conformance with the current Code standard.” This would include foundation requirements that would likely necessitate teardown of the existing structures.

¹⁰ City's ZIMAS Parcel Profile for 2170/2172 Stanley Hills Drive as of 1/27/15 lists the parcel as 3,750 square feet. The project plans dated 5/10/2011 list the parcel area as 7,500 square feet. This issue needs to be resolved.

¹¹ ZA 2013-2084(ZAD), page 22

¹² ZA 2013-2084(ZAD), page 24.

¹³ ZA 2013-2084(ZAD), page 28

In addition, according to the Geology and Soils Report Approval Letter attached to the RMND, the geotechnical consultant recommends that the proposed additions be supported on conventional and drilled pile foundations bearing on competent alluvium soil or bedrock. It has not been demonstrated that, given both the site configuration, access limitations, and foundation requirements for the additions, that construction can be accomplished without removal of the existing structures, or that remodeling is either feasible or desirable, or that it can be accomplished without a risk to safety.

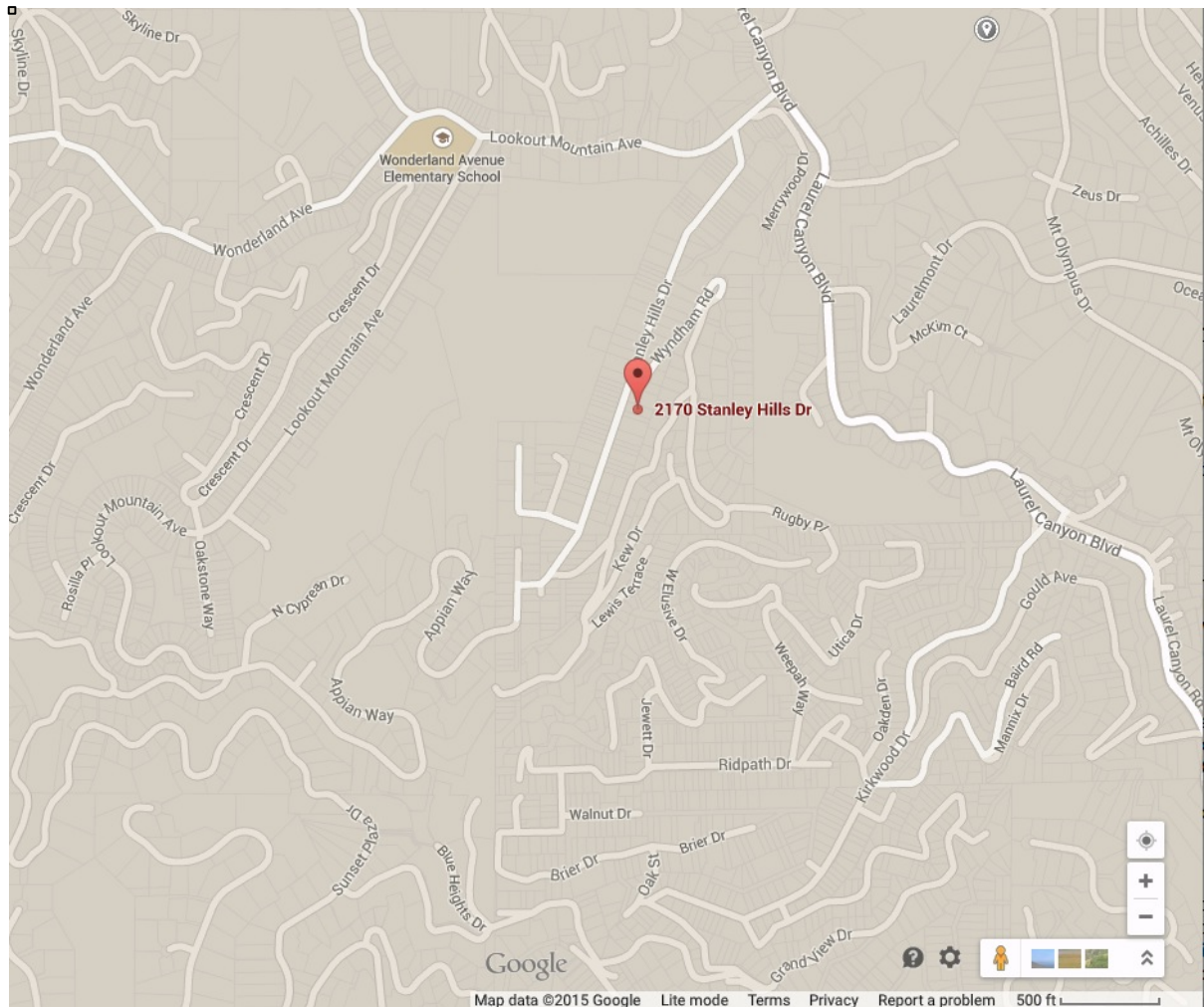
According to the Geology and Soils Report Approval Letter for 2170 and 2172: "(t)he site is located in a designated seismically induced landslide hazard zone as shown on the "Seismic Hazard Zones" map issued by the State of California. However, alterations and additions to a 1- to 2-story single-family residence not exceeding 1,500 square feet are currently exempt (P/BC2008-113)." The project proposes to add 470 square feet to an existing 864 square-foot single-family dwelling at 2170 Stanley Hills Drive (for a total of 1,334 square feet) and a 782 square-foot addition to an existing 845 square-foot single-family dwelling at 2172 Stanley Hills Drive (for a total of 1,629 square feet). By not addressing the question of whether remodeling is feasible and allowing the project to proceed, the City has allowed the two essentially new homes to be exempt from important geotechnical safety requirements resulting in the potential for impacts.

In failing to address the issue of whether remodeling of the existing homes is feasible or desirable, the City has left open the potential for significant geotechnical and zoning code consistency impacts, which cannot be resolved without a resolution of this important issue.

3.3 Lack of Project Location Map

CEQA Guidelines Section 15071(b) requires an MND include: "(t)he location of the project, preferably shown on a map, and the name of the project proponent." The RMND does not include a map showing the location of the project. A map is important in this case to an understanding of the roadway and emergency access constraints at the project site as detailed in Attachment D. As shown in Figure 1, there are limited routes for exiting from the project sites in the event of an emergency, and limited emergency access for emergency vehicles in the event that construction vehicles block the very narrow Stanley Hills Drive. Failure to include a project location map creates an inadequate description of the environmental setting of the proposed project.

FIGURE 1: PROJECT LOCATION



Source: Google

3.4 Other Important Information Omitted From the Project Description Important to an Assessment of Potential Project Impacts

The RMND omits other information that is important to an analysis and understanding of potential project impacts, including:

Information on Construction - CEQA Guidelines Section 15063(a)(1) requires:

All Phases of project planning, implementation, and operations must be considered in the Initial Study of the project.

The RNMD fails to discuss construction phasing and timing. This is important to an understanding of both project impacts and the feasibility of mitigation measures. Will all three houses be built concurrently, or consecutively? What is the timing of each phases

of the project? How will construction on the two sites be coordinated? This will affect both noise and street operation-related impacts.

Grading - The RMND fails to discuss the amount of landform modification associated with the project. How much grading, import and export of soil will occur? This will affect both air quality and street operation-related impacts. The ZAD cites the project architect as saying the “proposed project will require approximately 1,300 and 1,671 cubic yards of grading.”¹⁴ This information is not included in the RNMD. No information is provided on soil import or export.

Site Plans – No plans for the proposed project are included in the RMND. Plans are important to an understanding of the lot configurations, topography, and environmental constraints on the project site, such as the 25-foot lot width of 2166 Stanley Hills Drive, which affects the design of the project, and the feasibility of some construction mitigations, given the limited on-site operational area for construction vehicles. The site plans also show that 2166 Stanley Hills Drive is proposed for a 2,060 square foot home that would be only 15 feet wide, but 31 feet 10 inches tall, and consist of two-stories on top of a garage as shown in the project plans included in Attachment A.

4. VIOLATION OF CEQA GUIDELINES SECTION 15063(d)(2) – INADEQUATE DESCRIPTION OF THE ENVIRONMENTAL SETTING

The sum total of the environmental setting description contained in the RMND is as follows:¹⁵

Surrounding properties are zoned R1-1 and are narrow, deep lots on substandard streets. Most are improved with single family dwellings, although many are vacant. Stanley Hills Drive is a Local Street dedicated to a width of 20 feet and is improved to a width of 18 feet with a concrete roadway and concrete curbs. It is a Red Flag Street. Lookout Mountain Drive is a Local Street dedicated to a width of 40 feet and is improved to a width of 31 and variable feet with a concrete roadway and concrete curbs. Laurel Canyon Boulevard is designated as a Secondary Highway dedicated to a width of 60 and variable feet and is improved to a width of 25 and variable feet with a concrete roadway and concrete curbs.

The RMND fails to provide any information about the project sites or the existing uses and conditions on the project sites. For example, a reader of the RMND would not know that the two homes on the 2170/2172 Stanley Hills parcel have been vacant for a number of years and are in disrepair. The RMND fails to provide any information on existing vegetation on the project site. The RNMD fails to discuss the location of a wildlife corridor in the project area (see Attachment E, the Comment Letter from the Santa Monica Mountains Conservancy, and Section 6.4 of this letter). The RMND fails

¹⁴2013-2084(ZAD), page 23

¹⁵ RMND page 7

to note that the project tract is called Bungalow-Land¹⁶ in recognition of the original small-scale nature of homes in the area.

5. VIOLATION OF CEQA GUIDELINES SECTION 15063(d)(5) – FAILURE TO INCLUDE A DISCUSSION OF PROJECT’S CONSISTENCY WITH APPLICABLE LAND USE CONTROLS

Section 15063(d)(5) of the CEQA Guidelines requires an Initial Study to include:

An examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls.

Despite the fact that Laurel Canyon Association and a number of other commenters on the MND and RMND raised the issue of zoning consistency, the RMND fails to include any real analysis of the project’s consistency with applicable land use controls.¹⁷ The cover sheet of the Initial Study Checklist contained in the RMND identifies the project as being within the Hollywood Community Plan area and has a check mark indicating the project conforms to the Plan. There is no discussion or analysis to support this determination contained in the RMND.

The cover sheet of the Initial Study Checklist contained in the RMND lists the existing zoning as R1-1 and the General Plan Land Use as Low II Residential. There is no discussion or analysis of the project’s consistency with the R1-1 Zone and the RMND does not identify 2170/2172 as containing two homes and thus as a non-conforming use. There is no discussion of the project’s consistency with Section 12.23 – Nonconforming Buildings and Uses, of the City’s Zoning Code. Section 12.23 of the zoning code states:

C. Nonconforming Use Of Land

1. Discontinuation of Nonconforming Use of Land. (Amended by Ord. No. 178,599, Eff. 5/26/07.)

(a) In the A, R or C Zones, a nonconforming use of land shall be discontinued within five years from June 1, 1946, or from the date the use becomes nonconforming, whichever date is later, in each of the following cases:

(i) where no buildings are utilized in connection with the use;

(ii) where the only buildings utilized are accessory or incidental to the use;

¹⁶ City ZIMAS records for the parcels.

¹⁷ Email to Michael Obrien, from the Laurel Canyon Association dated April 3, 2014 regarding ENV-2013-2085-MND; Case Nos: ZA-2013-2084-ZAD and ZA- 2013-2087-ZAD, incorporated herein by reference.

(iii) where the use is maintained in connection with a conforming building.

(b) A nonconforming use of land, which is accessory or incidental to the nonconforming use of a building, shall be discontinued on the same date the nonconforming use of the building is discontinued.

2. Continuation of Nonconforming Use of Land. (Amended by Ord. No. 178,599, Eff. 5/26/07.) Except as provided in Subdivision 1. above, the nonconforming use of land may be continued, subject to the following limitations:

(a) that the use is not expanded or extended in any way either on the same or adjoining land beyond the limits of what was originally permitted; and

(b) that the use is not changed, except to a use that conforms to the current use regulations of the zone and other applicable current land use regulations; and

(c) in the MR or M1 Zone, the use shall be completely enclosed within a building or within an area enclosed on all sides with a solid wall or solid fence of a height sufficient to screen the use from public view, but in no event less than six feet in height, within one year from the date the use becomes nonconforming; and

(d) if the use is discontinued for a continuous period of one year, it shall not be reestablished.

It is thus unclear why the proposed use at 2170/2172 Stanley Hills Drive is allowable, given that the buildings have been uninhabited and abandoned for many years.

The cover sheet of the Initial Study Checklist contained in the RMND contains boxes for the Maximum Density/Intensity Allowed by Zoning, the Maximum Density/Intensity Allowed by Plan Designation and the Proposed Project Density. These boxes are blank in the RMND, and the RMND fails to provide even this most basic of consistency analysis.

The RMND fails to identify the project parcels as subject to the City's Baseline Hillside Ordinance and Hillside Area (Zoning Code)¹⁸ or to provide an analysis of consistency with these requirements. As noted by the Laurel Canyon Association in their comment letter:

(T)he home proposed on APN No. 5567-010-010 does not comply with the City's Baseline Hillside Ordinance ("BHO"). The minimum setback for this lot (which is 25 feet wide) is 5 feet and the proposed house is 15 feet wide.

¹⁸ ZIMAS Parcel Profile Report, 1/27/15.

The BHO requires that an applicant add an additional foot to the setback of a house if it is more than 18 feet above natural grade. In this instance, the house is proposed to be 31 feet tall. Therefore, the applicant would need to increase the setback of his home by one foot to be compliant with the BHO, making the width of his house 13 feet. As currently proposed, the home is not compliant with the BHO and therefore is not consistent with the General Plan (and CEQA).

6. VIOLATION OF CEQA GUIDELINES SECTION 15063, 15064 and 15070(a) – LACK OF SUBSTANTIAL EVIDENCE SUPPORTING IMPACT JUDGMENTS IN THE INITIAL STUDY

Judgments in the Initial Study are not supported by substantial evidence. As noted in Guidelines Section 15064(f)(5):

“Argument, speculation, unsubstantiated opinion or narrative, or evidence that is clearly inaccurate or erroneous, or evidence that is not credible, shall not constitute substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.

Guideline Section 15064(b) requires that a lead agency’s judgment as to whether a project will result in significant effects be “based to the extent possible on scientific and factual data.” Guidelines Section 15064(c) requires a lead agency to “consider the views held by members of the public in all areas affected as expressed in the whole record before the agency” when determining whether a project’s impact will be adverse.

The City’s own instructions for the Evaluation of Environmental Impacts contained on page 8/23 and 9/23 of the Initial Study included in the RMND, state:

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has

reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.

9. The explanation of each issue should identify: a. The significance criteria or threshold, if any, used to evaluate each question; and b. The mitigation measure identified, if any, to reduce the impact to less than significance.

The City's instructions mirror the instructions in the CEQA Guidelines Environmental Checklist Form (Guidelines Appendix G), which are intended to ensure compliance with CEQA Guidelines Section 15063(d)(3).

Only sources cited in the RMND are broadly described as follows:¹⁹

The Environmental Impact Assessment includes the use of official City of Los Angeles and other government source reference materials related to various environmental impact categories (e.g., Hydrology, Air Quality, Biology, Cultural Resources, etc.). The State of California, Department of Conservation, Division of Mines and Geology - Seismic Hazard Maps and reports, are used to identify potential future significant seismic events; including probable magnitudes, liquefaction, and landslide hazards. Based on applicant information provided in the Master Land Use Application and Environmental Assessment Form, impact evaluations were based on stated facts contained therein, including but not limited to, reference materials indicated above, field investigation of the project site, and any other reliable reference materials known at the time.

...

ADDITIONAL INFORMATION:

All supporting documents and references are contained in the Environmental Case File referenced above and may be viewed in the EIR Unit, Room 763, City Hall.

¹⁹ RMND, page 16.

For City information, addresses and phone numbers: visit the City's website at <http://www.lacity.org>; City Planning - and Zoning Information Mapping Automated System (ZIMAS) cityplanning.lacity.org/ or EIR Unit, City Hall, 200 N Spring Street, Room 763.
Seismic Hazard Maps - [http://gmw.consrv.ca.gov/shmp/Engineering/Infrastructure/Topographic Maps/](http://gmw.consrv.ca.gov/shmp/Engineering/Infrastructure/Topographic%20Maps/) Parcel Information - <http://boemaps.eng.ci.la.ca.us/index01.htm> or City's main website under the heading "Navigate LA".

As detailed in Sections 6.1 to 6.18 of this letter, the impact judgments contained in the RMND are not supported by substantial evidence. The reader is left to guess at the basis of the judgment and what if any information was used to support the judgments. Information sources are not cited in parentheses as part of the answer to each question. The narrative provided does not include an explanation of the thresholds used. In addition, when mitigation measures are specified, there is no explanation of how they reduce the effect to a less than significant level. While the narrative is sufficient to justify the preparation of an EIR, it is not sufficient to support the use of an MND for this project.

Sections 6.1 to 6.18 below quote the sum total of the environmental impacts explanations contained on pages 17/23 to 23/23 of the RMND, followed by a comment explaining the defects associated with the analysis of each issue area.

6.1 I. Aesthetics

This is the sum total of the aesthetic impact analysis included in the RMND:

- a. No Impact: Since there are no scenic vistas in the area, the Project will have no impact.
- b. No Impact: Since there are no scenic resources in the area, the Project will have no impact.
- c. No Impact: Since the Project will be visually compatible with existing development in the area, the Project will have no impact.
- d. No Impact: The construction of the proposed Project could create additional light and glare, such as from the new residences. However, this impact will not be significant.

Comments: The "No Impact" answers a., b., c., and d are not supported by information sources cited in the parentheses following each question, as required by Instruction #1 of the City's Initial Study Checklist (see Section 6 of this comment letter) or explained when based on project-specific factors. As prohibited by CEQA Guidelines Section 15064(f)(5), the impact judgments constitute speculation, and unsubstantiated opinion or narrative.

Response c., for example, provides no information on the existing visual character of the site or neighborhood. The “No Impact” judgment is contradicted by Impact Judgment IV.e which identifies potentially significant impacts from the loss of trees on the site, and requires the preparation of a tree survey, yet there is no characterization in Impact Judgment I.c. of the nature of trees and vegetation on the site and whether the loss of such trees would constitute a significant impact. The plans for 2170/2172 Stanley Hills Drive show that the proposed project would result in the removal of a very large multi-trunk pine trees along Stanley Hills Drive, shown in Figure 2. Loss of this large tree, which screens the site from homes across the street, would constitute a significant negative change in the visual character of the site and its surroundings.

FIGURE 2: LARGE PINE TREE ON PROJECT SITE SHOWN ON PROJECT PLANS AS TO BE REMOVED



Note inadequate fencing of project site.

Mitigation IV-70 that requires replacement of non-protected trees at a 1:1 ratio with a minimum 24-inch box tree, is not sufficient to mitigate for the loss of this large tree.

Construction of 2166 Stanley Hills Drive consists of construction of a 2,060 square foot home on a parcel that is only 25-feet wide. The new home would be only 15-feet wide,

but 31 feet 10 inches tall, and consist of two-stories on top of a garage, as shown in the project plans included in Attachment A. There is no analysis of whether this type of structure is consistent with the bungalow nature that characterized the tract's development and whether this tall, thin home would negatively alter the visual character and quality of the neighborhood. Issue I.c. remains Potentially Significant.

6.2 II. Agriculture and Forestry Resources

This is the sum total of the agricultural resource impact analysis included in the RMND:

- a. No Impact: Since the Project is not located in prime farmland, there will be no impact.
- b. No Impact: Since the Project is not located in land zoned for agriculture, there will be no impact.
- c. No Impact: Since the Project is not located in forest land, there will be no impact. Since the Project is not located in forest land, there will be no impact.
- d. No Impact: Since the Project is not located in farmland or forest land, there will be no impact.

Comments: The "No Impact" answers a., b., c., and d are not supported by information sources cited in the parentheses following each question, as required by Instruction #1 of the City's Initial Study Checklist (see Section 6 of this comment letter) or explained when based on project-specific factors. As prohibited by CEQA Guidelines Section 15064(f)(5), the impact judgments constitute speculation, and unsubstantiated opinion or narrative.

6.3 III. Air Quality

This is the sum total of the air quality impact analysis included in the RMND:

- a. No Impact: Since the Project will generate few emissions, it will not conflict with any air quality plan.
- b. Potentially Significant Unless Mitigation Incorporated: Demolition of existing structures and rehabilitation of the existing structure could release dust and fine particulates into the atmosphere. Mitigation 111-10 - Application of the proposed mitigation measures will reduce the potential impacts to insignificance.
- c. No Impact: Since the Project will generate minimal emissions, it will not result in the increase of any criteria pollutants.

- d. No Impact: Since there are no sensitive receptors in the vicinity, the Project will not expose sensitive receptors to substantial pollutant concentrations. Since the Project will not generate any objectionable odors, it will not affect a substantial number of people.

Comments: The "No Impact" answers a., c., and d. are not supported by information sources cited in the parentheses following each question, as required by Instruction #1 of the City's Initial Study Checklist (see Section 6 of this comment letter) or explained when based on project-specific factors. There is no evidence the SCAQMD's CalEEMod model was run to determine project emissions. As prohibited by CEQA Guidelines Section 15064(f)(5), the impact judgments constitute speculation, and unsubstantiated opinion or narrative.

Answer b. does not describe the mitigation measure, and briefly explain how it will reduce the effect to a less than significant level as required by Instruction #4 of the City's Initial Study Checklist (see Section 6 of this comment letter). No information regarding the threshold of significance used in determining an impact is provided as required by Instruction #9 of the City's Initial Study Checklist. Given the lack of an evaluation regarding the nature and magnitude of potentially significant impacts, it is not clear that the mitigation measures "would avoid the effects or mitigate the effects to a point where clearly no significant effects on the environment would occur" as required by CEQA Guidelines Sections 15064(f)(2) 15070(b)(1), given the amount of grading on the sites indicated in the Zoning Administrator's Determination. Issue III.b. remains Potentially Significant.

6.4 IV. Biological Resources

This is the sum total of the biological resource impact analysis included in the RMND:

- a. Potentially Significant Unless Mitigation Incorporated: Since there are no sensitive species on the Project site, there will be no impact. Mitigation IV-10 - Application of the proposed mitigation measures will reduce the potential impacts to insignificance.
- b. No Impact: Since the site is built-up urban land, the Project will have no impact on riparian resources.
- c. No Impact: Since the site is built-up urban land, the Project will have no impact on wetlands.
- d. No Impact: A habitat corridor, wildlife corridor or green corridor is an area of habitat connecting wildlife populations separated by human activities or structures. The corridor still must be wide enough to be safe and also encourage the animals to use it, even though they do not live out their entire lives in it. [Wikipedia] The County of Los Angeles General Plan Draft for Regional Wildlife Linkages does not identify any wildlife corridors in the area. Therefore, the Project will not

have a significant impact on the movement of native species. Since the Project is not located within a Habitat Conservation Plan, there will be no impact.

- e. No Impact: Potentially Significant Unless Mitigation Incorporated:
- f. Potentially Significant Unless Mitigation Incorporated: Since there potentially are protected trees on the site, there could potentially be a significant impact due to their removal during the construction process. IV-50, IV-70 Application of the proposed mitigation measures will reduce the potential impacts to insignificance.

Comments: The "No Impact" answers b., c., d., and e. are not supported by information sources cited in the parentheses following each question, as required by Instruction #1 of the City's Initial Study Checklist or explained when based on project-specific factors. The conclusion in answer a. that there are no sensitive species on the Project site is not supported by any evidence. As prohibited by CEQA Guidelines Section 15064(f)(5), the impact judgments constitute speculation, and unsubstantiated opinion or narrative.

A number of residents testified to the biological resource impacts associated with the potential loss of the tall pine trees on the project site, which have been observed to be used for nesting by hawks.²⁰ Although the City added a new mitigation measure in the ZAD to address potential impacts to migratory birds, no biological resource study has been conducted as part of the preparation of the RMND to assess species that may be displaced by the project.

"No Impact" answer d. has been contradicted by expert opinion provided in a comment letter on the MND provided by Paul Edelman of the Santa Monica Mountains Conservancy. (See also Attachment E). Although the City added a new mitigation measure in the ZAD to address wildlife corridor impacts, that mitigation is not included in the RMND and the Initial Study Checklist portion of the RMND answer has not been changed to reflect the information received during the comment period from a State Agency, and the City has not prepared an EIR. Answer IV.d. should be Potentially Significant. In addition, the Wildlife Corridor Mitigation from the ZAD, which currently reads as follows, should be augmented to require the placement of a conservation easement on the wildlife corridor on-site in order to ensure true protection of the wildlife corridor and impact mitigation:

Wildlife Corridor

No fencing, lighting, grading, planting of non-native vegetation, facilities or hardscape shall be permitted within 40 feet from the easterly property line. This Condition shall not preclude the installation of low-level security lighting.

²⁰ See for example: Letter from Ron Charles to Michael O'Brien dated April 2, 2014 regarding Project Title ENV-2013-2085-MND Project Location 2170 N Stanley Hills Drive.

"No Impact" answer e. is contradicted by the project plans that show oak trees as present at 2166 Stanley Hills Drive. Ordinance 177404 of the City of Los Angeles defines oak trees as a protected tree. Answer IV.e. should be Potentially Significant.

Answers a. and f. do not describe the mitigation measure, or briefly explain how they will reduce the effect to a less than significant level as required by Instruction #4 of the City's Initial Study Checklist. No information regarding the threshold of significance used in determining an impact is provided as required by Instruction #9 of the City's Initial Study Checklist. Given the lack of an evaluation regarding the nature and magnitude of potentially significant impacts, it is not clear that the mitigation measures "would avoid the effects or mitigate the effects to a point where clearly no significant effects on the environment would occur" as required by CEQA Guidelines Sections 15064(f)(2) 15070(b)(1). Issues IV.a. and IV.f. remain Potentially Significant.

6.5 V, Cultural Resources

This is the sum total of the cultural resource impact analysis included in the RMND:

- a. No Impact: Since the property is not "historic," defined as containing any building, structure, Landscaping, Natural Feature, or lot, including street features, furniture or fixtures which depicts, represents or is associated with persons or phenomena which significantly affect or which have significantly affected the functional activities, heritage, growth or development of the City, State, or Nation, there will be no impact.
- b. No Impact: Since the property is not in an area of known archaeological resources, the Project will have no impact.
- c. No Impact: Since the property is not in an area of known paleontological resources, the Project will have no impact.
- d. No Impact: Since the property is not in an area of known human remains, the Project will have no impact.

Comments: The "No Impact" answers a., b., c., and d. are not supported by information sources cited in the parentheses following each question, as required by Instruction #1 of the City's Initial Study Checklist (see Section 6 of this comment letter) or explained when based on project-specific factors. As prohibited by CEQA Guidelines Section 15064(f)(5), the impact judgments constitute speculation, and unsubstantiated opinion or narrative.

6.6 VI. Geology/Soils

This is the sum total of the geology/soils impact analysis included in the RMND:

- a. No Impact: Since the Project is not located in an Alquist-Priolo zone, there will be no impact.
- b. Potentially Significant Unless Mitigation Incorporated: Since the Project is Within the Fault Zone, there could potentially be impacts from strong seismic ground shaking. Mitigation VI-10 - Application of the proposed mitigation measures will reduce the potential impacts to insignificance.
- c. No Impact: Since the Project is not located in a liquefaction area, there will be no impact.
- d. Potentially Significant Unless Mitigation Incorporated: Since the Project is located in a Liquefaction Area, there could potentially be significant impact. Mitigation - VI-60 Application of the proposed mitigation measures will reduce the potential impacts to insignificance.
- e. Potentially Significant Unless Mitigation Incorporated: Since the Project will involve grading, there could be a significant impact from soil erosion. Mitigations - VI-20, VI-30, VI-50 Application of the proposed mitigation measures will reduce the potential impacts to insignificance.
- f. No Impact: Since the Project is not located in an area of unstable soil, there will be no impact.
- g. No Impact: Since the Project is not located in an area of expansive soil, there will be no impact.
- h. No Impact: Since the Project will not use septic tanks, but will be connected to the city's sanitary sewer system, there will be no impact.

Comments: The "No Impact" answers a., c., f. g. and h. are not supported by information sources cited in the parentheses following each question, as required by Instruction #1 of the City's Initial Study Checklist or explained when based on project-specific factors. As prohibited by CEQA Guidelines Section 15064(f)(5), the impact judgments constitute speculation, and unsubstantiated opinion or narrative.

Answer b., d and e. do not describe the mitigation measures, and briefly explain how they will reduce the effect to a less than significant level as required by Instruction #4 of the City's Initial Study Checklist (see Section 6 of this comment letter). No information regarding the threshold of significance used in determining an impact or that mitigation to less than significant can be accomplished is provided as required by Instruction #9 of the City's Initial Study Checklist. Given the lack of an evaluation regarding the nature and magnitude of potentially significant impacts, it is not clear that the mitigation measures "would avoid the effects or mitigate the effects to a point where clearly no

significant effects on the environment would occur” as required by CEQA Guidelines Sections 15064(f)(2) 15070(b)(1). Issues VI.b. and VI.e. remain Potentially Significant.

Answers c. and d. are contradictory; answer c. says the project is not located in a liquefaction area and answer d. say that it is in a liquefaction area. Question d. actually asks if the site is located in an area subject to landslide hazards. As noted in the Geology and Soils approval letters attached to the RMND and City’s Zimas record for the subject sites, 2170/2172 and 2166 Stanley Hills Drive are both located in landslide hazard areas. This is not addressed in the narrative of the RMND. Given that the area is subject to landslide hazards and is located in a Special Grading Area,²¹ impact judgment f., which states that the project is not located in an area of unstable soil, would appear to be inaccurate. See also the discussion in Section 3.2 of this letter. Issues VI.d. and VI.f. remain Potentially Significant.

See also Sections 3.2 and 9.5 of this letter.

6.7 VII. Greenhouse Gas Emissions

This is the sum total of the impact analysis included in the RMND:

- a. Potentially Significant Unless Mitigation Incorporated: Construction of the Project could potentially release significant amounts of greenhouse gases during the demolition of the existing building, and site grading activities. Mitigation VII-10 - Application of the proposed mitigation measures will reduce the potential impacts to insignificance.
- b. No Impact: Since the Project will not conflict with any applicable plan regulating greenhouse gases, there will be no impact.

Comments: The "No Impact" answer b. is not supported by information sources cited in the parentheses following each question, as required by Instruction #1 of the City’s Initial Study Checklist (see Section 6 of this comment letter) or explained when based on project-specific factors. As prohibited by CEQA Guidelines Section 15064(f)(5), the impact judgments constitute speculation, and unsubstantiated opinion or narrative.

Answer a. does not describe the mitigation measure, and briefly explain how it will reduce the effect to a less than significant level as required by Instruction #4 of the City’s Initial Study Checklist (see Section 6 of this comment letter). Given the lack of an evaluation regarding the nature and magnitude of potentially significant impacts, it is not clear that the mitigation measures “would avoid the effects or mitigate the effects to a point where clearly no significant effects on the environment would occur” as required by CEQA Guidelines Sections 15064(f)(2) 15070(b)(1). Issue VII.a. remains Potentially Significant.

²¹ City ZIMAS records for the sites.

The analysis of potential greenhouse gas impacts does not comply with the requirements of CEQA Guidelines Section 15064.4 – Determining the Significance of Impacts from Greenhouse Gas Emissions. The impact judgment analysis uses neither a model nor methodology to quantify greenhouse gas emissions, nor provides a qualitative analysis or performance based standards. In addition, there is no discussion of the extent to which the project complies with regulations or requirements adopted to implement statewide, regional or local plan requirements for reduction of greenhouse gases.

6.8 VIII. Hazards & Hazardous Materials

This is the sum total of the hazards & hazardous materials impact analysis included in the RMND:

- a. No Impact: Since the Project involves no hazardous materials, there will be no impact.
- b. Potentially Significant Unless Mitigation Incorporated: Since the Project could release hazardous materials such as asbestos during demolition of the existing building interior, there could potentially be a significant impact. Mitigation VIII-10 - Application of the proposed mitigation measures will reduce the potential impacts to insignificance.
- c. No Impact: Since the Project is not near any school, there will be no impact.
- d. No Impact: Since the Project is not located on a hazardous materials site, there will be no impact.
- e. No Impact: Since the Project is not located in an airport land use plan area, there will be no impact.
- f. No Impact: Since the Project is not located in the vicinity of a private airstrip, there will be no impact.
- g. Potentially Significant Unless Mitigation Incorporated: Since the Project is located on a street with impaired emergency response, it could potentially impair an emergency response plan. Mitigation VIII-70 - Application of the proposed mitigation measures will reduce the potential impacts to insignificance.
- h. Potentially Significant Unless Mitigation Incorporated: Since the Project is located in an area potentially subject to wildland fires, there could potentially be a significant impact. Mitigation VIII-70 - Application of the proposed mitigation measures will reduce the potential impacts to insignificance.

Comments: The "No Impact" answers a., c., d., e. and f. are not supported by information sources cited in the parentheses following each question, as required by Instruction #1 of the City's Initial Study Checklist (see Section 6 of this comment letter) or explained when based on project-specific factors. As prohibited by CEQA Guidelines Section 15064(f)(5), the impact judgments constitute speculation, and unsubstantiated opinion or narrative. Answer c. fails to identify the location of the nearest school, which is Wonderland Avenue Elementary School, which is less than a half-mile away (see Figure 1).

Answers b., g. and h. do not describe the mitigation measures, and briefly explain how they will reduce the effect to a less than significant level as required by Instruction #4 of the City's Initial Study Checklist (see Section 6 of this comment letter). No information regarding the threshold of significance used in determining an impact is provided as required by Instruction #9 of the City's Initial Study Checklist. Given the lack of an evaluation regarding the nature and magnitude of potentially significant impacts, it is not clear that the mitigation measures "would avoid the effects or mitigate the effects to a point where clearly no significant effects on the environment would occur" as required by CEQA Guidelines Sections 15064(f)(2) 15070(b)(1). A number of residents have testified and provided comment letters on the problem of inadequate emergency access on the street. On non-red flag days, Stanley Hills Drive is essentially a one-lane street. Cars traveling downhill are required to pull over to allow uphill cars to pass. Given the number of parked cars on a typical day, it can be difficult to find adequate pull-over locations. As noted by one resident:²²

The plans for the construction at the above noted site calls for "tandem parking." Such garages in Laurel Canyon with tandem parking just don't work because they don't actually park two cars in the garage (because tandem parking is extremely inconvenient, time consuming and frankly dangerous in the canyon). They wind up parking one car on the street or having the second car protrude onto the street, blocking crucial "Pullover spots" or taking up a street spot the tandem garage was supposed to alleviate. Frankly, the whole tandem parking concept up in the canyon is just a ruse to get around having to provide the required amount of off street parking and would be a dangerous precedent.

Stanley Hills cannot accommodate any additional parking spot or "pullover zone" losses. What ultimately happens is that people who can't find a spot often park in front of fire hydrants, red zones, as well as in front of other peoples garages, blocking them. This causes all kinds of problems and hazards as well because people who can't find parking drive around the neighborhood looking for a parking space, which causes even more traffic jams and pollution.

Fires can occur on non-redflag days, and emergency access on those days can be difficult as detailed in Attachment D. Mitigation Measure XVI-60 which includes are

²² Letter to Mr. O'Brien from Jeff and Kim Walker dated April 1, 2014 on the MND.

requirement that “at no time during construction shall Stanley Hills Drive be reduced to a roadway width of less than 10 feet” may not be feasible as discussed in Section 9.4.

Issue b., g. and h. therefore remain Potentially Significant.

6.9 IX. Hydrology/Water Quality

This is the sum total of the hydrology/water quality impact analysis included in the RMND:

- a. No Impact: Since the Project will not violate any water quality of waste discharge standards, there will be no impact.
- b. No Impact: Since the Project will use minimal water, it will not deplete groundwater supplies or interfere with aquifer recharge, and it will have no impact.
- c. Potentially Significant Unless Mitigation Incorporated: Since considerable movement of earth is proposed during the construction process, there could potentially be significant amounts of erosion. IX-20 Application of the proposed mitigation measures will reduce the potential impacts to insignificance.
- d. Potentially Significant Unless Mitigation Incorporated: Since the Project will substantially alter drainage patterns on site, there could potentially be a significant impact. Mitigation IX-20 - Application of the proposed mitigation measures will reduce the potential impacts to insignificance.
- e. No Impact: Since the Project will not exceed the capacity of the existing stormwater drainage system, there will be no impact.
- f. No Impact: Since the Project will not substantially degrade water quality, it will have no impact.
- g. No Impact: Since the Project is not within a 100 year flood zone, there will be no impact.
- h. No Impact: Since the Project is not within a 100 year flood zone, there will be no impact.
- i. No Impact: Since the Project is not downstream from any dam, there will be no impact.
- j. No Impact: Since the Project is not located in a tsunami area, there will be no impact.

Comments: The "No Impact" answers a., b., e., f., g., h., i., and j. are not supported by information sources cited in the parentheses following each question, as required by Instruction #1 of the City's Initial Study Checklist (see Section 6 of this comment letter) or explained when based on project-specific factors. As prohibited by CEQA Guidelines Section 15064(f)(5), the impact judgments constitute speculation, and unsubstantiated opinion or narrative. Answer e. does not provide any information regarding the existing stormdrain system. The project would increase impervious surfaces on the two sites. Water is often witnessed running down Stanley Hills Drive following a rainstorm. It is therefore unclear why Answer e. was not marked as potentially significant.

Answers c. and d. do not describe the mitigation measures, and briefly explain how they will reduce the effect to a less than significant level as required by Instruction #4 of the City's Initial Study Checklist (see Section 6 of this comment letter). No information regarding the threshold of significance used in determining an impact is provided as required by Instruction #9 of the City's Initial Study Checklist. Given the lack of an evaluation regarding the nature and magnitude of potentially significant impacts, it is not clear that the mitigation measures "would avoid the effects or mitigate the effects to a point where clearly no significant effects on the environment would occur" as required by CEQA Guidelines Sections 15064(f)(2) 15070(b)(1). Issues IX.c. and IX.d. therefore remain Potentially Significant.

6.10 X. Land Use/Planning

This is the sum total of the impact analysis included in the RMND:

- a. No Impact: Since the Project will not physically divide an established community, there will be no impact.
- b. No Impact: Since the Project will not conflict with any applicable land use plan, there will be no impact.
- c. No Impact: Since the Project is not located within any habitat conservation plan or community conservation plan, there will be no impact.

Comments: The "No Impact" answers a., b., and c. are not supported by information sources cited in the parentheses following each question, as required by Instruction #1 of the City's Initial Study Checklist (see Section 6 of this comment letter) or explained when based on project-specific factors. As prohibited by CEQA Guidelines Section 15064(f)(5), the impact judgments constitute speculation, and unsubstantiated opinion or narrative.

The Laurel Canyon Association in its April 3, 2014 comment letter presented detailed information regarding why the project is inconsistent with both the City's General Plan

and Baseline Hillside Ordinance. No response to these comments was provided in the two Zoning Administrator's Determinations (ZADs).

Please also see Sections 3.2 and 5 of this comment letter for a discussion as to why Issue X.b. should be "Potentially Significant."

6.11 XI. Mineral Resources

This is the sum total of the mineral resources impact analysis included in the RMND:

- a. No Impact: Since the Project is not located with an area of known mineral resources, there will be no impact.
- b. No Impact: Since the Project is not located with an area of known mineral resources, there will be no impact.

Comments: The "No Impact" answers a., and b. are not supported by information sources cited in the parentheses following each question, as required by Instruction #1 of the City's Initial Study Checklist (see Section 6 of this comment letter) or explained when based on project-specific factors. As prohibited by CEQA Guidelines Section 15064(f)(5), the impact judgments constitute speculation, and unsubstantiated opinion or narrative.

6.12 XII. Noise

This is the sum total of the noise impact analysis included in the RMND:

- a. No Impact: Since the Project will create no significant noise, there will be no impact.
- b. No Impact: Since the Project will create no significant vibrations or noise, there will be no impact.
- c. No Impact: Since the Project will create no significant noise, there will be no impact.
- d. Potentially Significant Unless Mitigation Incorporated: Since construction activities could exceed established noise regulations, there could potentially be a significant impact. Mitigation XII-20 - Application of the proposed mitigation measures will reduce the potential impacts to insignificance.
- e. No Impact: Since the Project is not located within an airport land use plan, there will be no impact.
- f. No Impact: Since the Project is not within the vicinity of a private airstrip, there will be no impact.

Comments: The "No Impact" answers a., b., c., e., and f. are not supported by information sources cited in the parentheses following each question, as required by Instruction #1 of the City's Initial Study Checklist (see Section 6 of this comment letter) or explained when based on project-specific factors. As prohibited by CEQA Guidelines Section 15064(f)(5), the impact judgments constitute speculation, and unsubstantiated opinion or narrative.

Answers d. does not describe the mitigation measure, and briefly explain how it will reduce the effect to a less than significant level as required by Instruction #4 of the City's Initial Study Checklist (see Section 6 of this comment letter). No information regarding the threshold of significance used in determining an impact is provided as required by Instruction #9 of the City's Initial Study Checklist. Given the lack of an evaluation regarding the nature and magnitude of potentially significant impacts, it is not clear that the mitigation measures "would avoid the effects or mitigate the effects to a point where clearly no significant effects on the environment would occur" as required by CEQA Guidelines Sections 15064(f)(2) 15070(b)(1). See the discussion in Section 9.1 of this letter regarding the feasibility of the mitigation measures and why Issue XII.d., therefore, remains potentially Significant.

6.13 XIII. Population/Housing

This is the sum total of the impact analysis included in the RMND:

- a. No Impact: Since the Project will not induce any population growth, there will be no impact.
- b. No Impact: Since the Project will not displace any housing, there will be no impact.
- c. No Impact: Since the Project will not displace any people, there will be no impact.

Comments: The "No Impact" answers a., b., and c. are not supported by information sources cited in the parentheses following each question, as required by Instruction #1 of the City's Initial Study Checklist (see Section 6 of this comment letter) or explained when based on project-specific factors. As prohibited by CEQA Guidelines Section 15064(f)(5), the impact judgments constitute speculation, and unsubstantiated opinion or narrative. Answer a. ignores the fact that the existing homes on the project site are uninhabitable and have been for a number of years. The proposed project will result in the creation of three new homes, resulting in population growth in the area.

6.14 XIV. Public Services

This is the sum total of the impact analysis included in the RMND:

- a. Potentially Significant Unless Mitigation Incorporated: Since the Project is located in an area potentially subject to wildland fire, the could potentially be a significant impact on fire protection. Mitigation 9.4- Application of the proposed mitigation measures will reduce the potential impacts to insignificance.
- b. No Impact: Since the Project will not create any new demand for police protection, there will be no impact.
- c. No Impact: Since the Project will not create any new demand for schools, there will be no impact.
- d. No Impact: Since the Project will not create any new demand for parks, there will be no impact.
- e. No Impact: Since the Project will not require any new or altered governmental facilities, there will be no impact.

Comments: The "No Impact" answers b., c., d. and e. are not supported by information sources cited in the parentheses following each question, as required by Instruction #1 of the City's Initial Study Checklist (see Section 6 of this comment letter) or explained when based on project-specific factors. As prohibited by CEQA Guidelines Section 15064(f)(5), the impact judgments constitute speculation, and unsubstantiated opinion or narrative.

Answer a. does not describe the mitigation measure, and briefly explain how it will reduce the effect to a less than significant level as required by Instruction #4 of the City's Initial Study Checklist (see Section 6 of this comment letter). No information regarding the threshold of significance used in determining an impact is provided as required by Instruction #9 of the City's Initial Study Checklist. Given the lack of an evaluation regarding the nature and magnitude of potentially significant impacts, it is not clear that the mitigation measures "would avoid the effects or mitigate the effects to a point where clearly no significant effects on the environment would occur" as required by CEQA Guidelines Sections 15064(f)(2) 15070(b)(1). Answer a. mischaracterizes the nature of fire hazards at the project sites; both parcels are located in Very High Fire Hazard Severity Zones.²³ In addition, it is questionable whether the requirements of Mitigation Measure XIV-10 can be met, given project plans, as discussed in Section 9.4 of this letter. Issue XIV.a., therefore, remains Potentially Significant.

Answer c. and d. state the project will not create new demand. As detailed in Section 3.2 of this letter, existing homes on the site are vacant and dilapidated and have been for many years. The proposed project essentially involves the construction of three new homes, which will result in an increased demand for school and recreational facilities in the area. Given the way the project has been characterized, it is unclear that the City

²³ City's ZIMAS record for the project sites.

will collect Quimby or school impact fees to mitigate these impacts. The potential for cumulative impacts remains.

6.15 XV. Recreation

This is the sum total of the impact analysis included in the RMND:

- a. No Impact: Since the Project will not increase the use of parks, there will be no impact.
- b. No Impact: Since the Project will not increase the use of recreational facilities, there will be no impact.

Comments: The "No Impact" answers a. and b. are not supported by information sources cited in the parentheses following each question, as required by Instruction #1 of the City's Initial Study Checklist (see Section 6 of this comment letter) or explained when based on project-specific factors. As prohibited by CEQA Guidelines Section 15064(f)(5), the impact judgments constitute speculation, and unsubstantiated opinion or narrative.

As detailed in Section 3.2 of this letter, existing homes on the site are vacant and dilapidated and have been for some time. The proposed project essentially involves the construction of three new homes, which will result in an increased demand for recreational facilities in the area. Given the way the project has been characterized, it is unclear that the City will collect Quimby fees to mitigate these impacts. The potential for cumulative impacts remains.

6.16 XVI. Transportation/Traffic

This is the sum total of the impact analysis included in the RMND:

- a. No Impact: Since the Project merely involves the construction of a single family dwelling, and thus minimal increase in vehicle trips, it will not conflict with any transportation plan, and there will be no impact.
- b. No Impact: Since the Project will not conflict with any congestion management plan, there will be no impact.
- c. No Impact: Since the Project will not change any air traffic patterns, there will be no impact.
- d. No Impact: Since the Project will not create any hazardous transportation facilities, there will be no impact.
- e. Potentially Significant Unless Mitigation Incorporated: The construction in a Hillside Area could result in inadequate emergency

access. Mitigation XVI-60 - Application of the proposed mitigation measures will reduce the potential impacts to insignificance.

- f. No Impact: Since the Project will not conflict with any plan for non-auto related transportation modalities, there will be no impact.

Comments: The "No Impact" answers a., b., c., d. and f. are not supported by information sources cited in the parentheses following each question, as required by Instruction #1 of the City's Initial Study Checklist (see Section 6 of this comment letter) or explained when based on project-specific factors. As prohibited by CEQA Guidelines Section 15064(f)(5), the impact judgments constitute speculation, and unsubstantiated opinion or narrative.

Answer e. does not describe the mitigation measure, and briefly explain how it will reduce the effect to a less than significant level as required by Instruction #4 of the City's Initial Study Checklist (see Section 6 of this comment letter). No information regarding the threshold of significance used in determining an impact is provided as required by Instruction #9 of the City's Initial Study Checklist. Given the lack of an evaluation regarding the nature and magnitude of potentially significant impacts, it is not clear that the mitigation measures "would avoid the effects or mitigate the effects to a point where clearly no significant effects on the environment would occur" as required by CEQA Guidelines Sections 15064(f)(2) 15070(b)(1). See discussion in Sections 9.2, 9.3 and 9.4 of this letter as to why Issue XVI.e., remains potentially significant.

6.17 XVII. Utilities/Service Systems

This is the sum total of the impact analysis included in the RMND:

- a. No Impact: Since the Project will not generate significant amounts of wastewater, there will be no impact.
- b. No Impact: Since the Project will not result in the construction of any new wastewater facilities, there will be no impact.
- c. No Impact: Since the Project will not result in the construction of any new stormwater drainage facilities, there will be no impact.
- d. Potentially Significant Unless Mitigation Incorporated: The provision of new toilet facilities will increase the demand on water supplies, and the installation of new irrigation systems will increase the demand on water supplies, which could potentially be significant. XVII-10, XVII-20, XVII-40 Application of the proposed mitigation measures will reduce the potential impacts to insignificance.
- e. No Impact: Since the Project will not require new water facilities, there will be no impact.

- f. Potentially Significant Unless Mitigation Incorporated: Construction demolition and the operation of two new residences could potentially have a significant impact on landfills. Mitigation XVII-90, XVII-100 - Application of the proposed mitigation measures will reduce the potential impacts to insignificance.
- g. No Impact: Since the Project will comply with federal, state and local regulations concerning solid waste, there will be no impact.

Comments: The "No Impact" answers a., b., c., e. and g. are not supported by information sources cited in the parentheses following each question, as required by Instruction #1 of the City's Initial Study Checklist (see Section 6 of this comment letter) or explained when based on project-specific factors. As prohibited by CEQA Guidelines Section 15064(f)(5), the impact judgments constitute speculation, and unsubstantiated opinion or narrative.

Answers d. and f. do not describe the mitigation measures, and briefly explain how they will reduce the effect to a less than significant level as required by Instruction #4 of the City's Initial Study Checklist (see Section 6 of this comment letter). No information regarding the threshold of significance used in determining an impact is provided as required by Instruction #9 of the City's Initial Study Checklist. Given the lack of an evaluation regarding the nature and magnitude of potentially significant impacts, it is not clear that the mitigation measures "would avoid the effects or mitigate the effects to a point where clearly no significant effects on the environment would occur" as required by CEQA Guidelines Sections 15064(f)(2) 15070(b)(1). Issues XVII.d. and XVII.f., therefore, remain Potentially Significant given the analysis provided in the RMND.

6.18 XVIII. Mandatory Findings of Significance

This is the sum total of the impact analysis included in the RMND:

- a. No Impact: Since the Project will not substantially degrade the environment, or reduce the habitat of fish and wildlife, or harm an historic resource, there will be no impact.
- b. No Impact: Since all similar Projects have had and will have their impacts mitigated to insignificance, there will be no impact.
- c. No Impact: Since the Project will have no substantial adverse impacts on human beings, there will be no impact.

Comments: The "No Impact" answers a., b., and c. are not supported by information sources cited in the parentheses following each question, as required by Instruction #1 of the City's Initial Study Checklist (see Section 6 of this comment letter) or explained when based on project-specific factors. As prohibited by CEQA Guidelines Section 15064(f)(5), the impact judgments constitute speculation, and unsubstantiated opinion or narrative.

Judgment XVIII.a. is not supported by substantial evidence and is contradicted by the presence of a wildlife corridor and oak trees on the project site. Issue XVIII.a., therefore, remains Potentially Significant.

Judgment XVIII.b. does not take account of the cumulative development in the area cited in the Zoning Administrator's Decision.²⁴ Residents of Stanley Hills Drive have expressed ongoing concern regarding cumulative aesthetic changes to the Bungalow-Land tract resulting from large-scale residential development that is not in character with the small-scale rural canyon nature of the street. Issue XVIII.b., therefore, remains Potentially Significant.

Judgment XVIII.c. does not take account of potentially significant geotechnical and hazards impacts detailed above. Issue XVIII.c., therefore, remains Potentially Significant.

7. VIOLATION OF CEQA GUIDELINES SECTION 15070(b)(1) – LACK OF EVIDENCE MITIGATION MEASURE WOULD AVOID THE EFFECTS OR MITIGATE EFFECTS TO THE POINT WHERE CLEARLY NO SIGNIFICANT EFFECTS WOULD OCCUR

As detailed in Section 6.1 to 6.18 of this letter, the Initial Study lacks any real analysis of the magnitude or nature of potentially significant impacts. Given the lack of information regarding the impacts, it is impossible to judge whether impacts are mitigated to the point where “clearly no significant effects would occur.”

8. VIOLATION OF CEQA GUIDELINES SECTION 15070(b)(1) - IMPROPER DEFERENTIAL OF MITIGATION

CEQA Guidelines Section 15070(b)(1) requires an applicant to agree to all revisions in the projects plans or proposal, including any mitigation measures, before a proposed mitigated negative declaration and initial study are released for public review. A lead agency cannot base a negative declaration on the presumed success of mitigation measures that have not been formulated at the time of project approval. As written, the following mitigation measures included in the RMND is are examples of improper deferral of mitigation:

8.1 IV-50 Tree Report

This mitigation reads as follows;

Prior to the issuance of a grading or building permit, the applicant shall prepare and submit a Tree Report, prepared by a Tree Expert as defined in Section 17.02, indicating the location, size, type, and condition of all existing trees on the site. Such report shall also contain a

²⁴2013-2087(ZAD), pages 19-21.

recommendation of measures to ensure the protection, relocation, or replacement of affected trees during grading and construction activities.

8.2 Mitigation 1 – Geology and Soils Approval Letter for 2170/2172 Stanley Hills Drive

Whenever the principal building on a site is added to, altered or repaired in excess of 50 percent of its replacement value, the entire site shall be brought up to the current Code standard. If this condition applies, a supplemental report identifying all non-conforming conditions shall be provided with recommendations to bring the entire site into conformance with the current Code standard.

Given the extreme dilapidation of the two existing houses at 2170/2172 Stanley Hills Drive, it is extremely likely that the cost of reconstruction will be in excess of 50 percent of the replacement value and a supplemental report will be required identifying how to remedy non-conforming conditions.

8.3 Recent Permit Application for 2166 Stanley Hills Drive

The City's on-line Permit and Inspection Report system shows that a permit for a proposed two-story home at 2166 N. Stanley Hills Drive was submitted on 1/29/2015 (application/permit 15010-70000-00348) (see Attachment F). This application is dated after the release of the RMND for public comment.

9. VIOLATION OF CEQA GUIDELINES SECTION 15070(b)(1) - INFEASIBLE MITIGATION MEASURES

9.1 Potentially Infeasible Noise Mitigation Measures

Mitigation Measure XVI-60 - Inadequate Emergency Access (Hillside Streets - Construction Activities) includes the following provision:

j. The project shall comply with the City of Los Angeles Noise Ordinance Nos. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses **unless technically infeasible**. Amplified music shall not be audible at the neighboring properties.

Similarly, Mitigation XII-20 - Increased Noise Levels (Demolition, Grading, and Construction Activities) states:

The project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses **unless technically infeasible**. Construction and demolition shall be restricted to the hours of 7:00 am to 6:00 pm Monday through Friday, and

8:00 am to 6:00 pm on Saturday. Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

No analysis has been performed to determine if mitigation to levels considered less than significant is technically feasible. Given the language “unless technically infeasible,” the mitigations are useless in ensuring that construction noise impacts will be reduced to a level considered less than significant. The potential for significant unmitigated noise impacts remains. This is particularly true given that the Geology and Soils Report Approval Letter for 2166 Stanley Hills Drive, states that: “the consultants recommend to support the proposed structures on drilled-pile foundations bearing on competent granitic bedrock. Competent bedrock at the west end of the proposed building is approximately 25 feet in depth.” Similarly, the Geology and Soils Report Approval Letter for 2170/2172 Stanley Hills Drive states: “consultants recommend to support the proposed structure on conventional and drilled pile foundations bearing on competent alluvium soil or bedrock.” Drilling, demolition and construction in close proximity to residences has the potential to result in unmitigated construction noise impacts. Typical noise levels for construction equipment are provided in the following table on the following page.

Section 112.05 – Maximum Noise Level of Powered Equipment or Powered Hand Tools (Amended by Ord. No. 161,574) of the City’s Municipal Code specified:

Between the hours of 7:00 a.m. and 10:00 p.m., in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet therefrom:

(a) 75dB(A) for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment;

(b) 75dB(A) for powered equipment of 20 HP or less intended for infrequent use in residential areas, including chain saws, log chippers and powered hand tools;

(c) 65dB(A) for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools and riding tractors;

The noise limits for particular equipment listed above in (a), (b) and (c) shall be deemed to be superseded and replaced by noise limits for such equipment from and after their establishment by final regulations adopted by the Federal Environmental Protection Agency and published in the Federal Register.

Said noise limitations shall not apply where compliance therewith is technically infeasible. The burden of proving that compliance is technically infeasible shall be upon the person or persons charged with a violation of this section. Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment.

Given the likely nature of the construction equipment to be used on the project site and the close proximity of the sites to adjacent residences, compliance with this code requirement is likely to be infeasible, resulting in significant unmitigated construction noise impacts.

Construction Equipment		NOISE LEVEL (dBA) AT 50 FEET													
		65	70	75	80	85	90	95	100	105					
Equipment Powered by Internal Combustion Engines	Earth Moving	Compactors (Rollers)													
		Front Loaders													
		Backhoes													
		Tractors													
		Scrapers, Graders													
		Pavers													
		Trucks													
Equipment Powered by Internal Combustion Engines	Materials Handling	Concrete Mixers													
		Concrete Pumps													
		Cranes (Movable)													
		Cranes (Derrick)													
Equipment Powered by Internal Combustion Engines	Stationary	Pumps													
		Generators													
		Compressors													
Impact Equipment	Pneumatic Wrenches														
	Jack Hammers and Rock Drills														
	Pile Drivers (Peaks)														
Other	Vibrator														
	Saws														

Source: EPA PB 206717, Environmental Protection Agency, Dec. 31, 1971, "Noise from Construction Equipment & Operations".

9.2 Inadequate Emergency and Neighborhood Access

The mitigations provide contradictory requirements for limiting construction worker parking on Stanley Hills Drive. Mitigation Measure 2 - Insufficient Parking Capacity (Parking Plan for Off-Street), which was added in response to comments, only requires workers to be shuttled from an off-site location on Red Flag days. Mitigation Measure XVI-GO - Inadequate Emergency Access (Hillside Streets - Construction Activities) states that: "construction workers, contractors, subcontractors and construction vehicles shall not be allowed to park on the residential streets in the project area." The mitigations need to be consistent as to the requirements, so that the applicant complies with the more restrictive requirement that bans any construction-related parking on Stanley Hills Drive.

Similarly, Mitigation Measure 2 - Insufficient Parking Capacity (Parking Plan for Off-Street) states that trucks delivering materials, construction-machinery, or removal of graded soil shall be limited to between the hours of 9 a.m. and 4 p.m., Monday through Friday only. In contrast Mitigation XVI-GO. - Inadequate Emergency Access (Hillside Streets - Construction Activities) states truck traffic shall be limited to the hours beginning at 9 a.m. and ending at 3 p.m., Monday through Friday only. This lack of consistency is both sloppy and fuels community concerns regarding mitigation enforcement.

There are also inconsistencies between the number of vehicles allowed to access the site at one time, as specified in Mitigations 2. - Insufficient Parking Capacity (Parking Plan for Off-Street), XVI-60. Inadequate Emergency Access (Hillside Streets - Construction Activities), and 2.- Hillside Mitigation Measures. It is unclear whether construction can be accomplished given the restriction on on-site equipment and vehicles. The RMND has not demonstrated that the mitigations are feasible.

9.3 Inadequacy of the Complaint Line

There are also inconsistencies in the mitigation measures regarding the applicant's required response to neighborhood complaints. Mitigation 2. Hillside Mitigation Measures requires that the complaint line be manned by a human, but does not specify response time. Mitigation XVI-GO. - Inadequate Emergency Access (Hillside Streets - Construction Activities) specifies that the applicant shall be required to respond within 24 hours of any complaint received on this hotline. Twenty-four hours to respond to a complaint regarding a truck blocking access or excessive noise will not insure that impacts are reduced to a level considered less than significant.

9.4 Inadequate Emergency Access

Mitigation Measure XVI-GO. Inadequate Emergency Access (Hillside Streets - Construction Activities), specifies that at "no time during construction activities shall Stanley Hills Drive be reduced to a roadway width of less than 10 feet." Given that Stanley Hills Drive is only 18 feet wide, the likely nature of some of the construction on site, such as the drilling of pile foundations to a depth of 25 feet, and the limited area on

site for construction machinery, it is unclear if this mitigation is feasible. There has been no showing of feasibility in the RMND. As detailed in the PowerPoint Presentation "Background on Stanley Hills Drive" in Attachment D prepared by a local resident, maintenance of adequate emergency access has been an on-going problem with recent construction projects in the area. The potential for impacts remains.

9.5 Seismic

Mitigation Measure VI-10 – Seismic specifies "design and construction of the project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety." However, the Geology and Soils Report Approval Letter for 2170/2172 Stanley Hills Drive, attached to the RMND, states that:

The site is located in a designated seismically induced landslide hazard zone as shown on the "Seismic Hazard Zones" map issued by the State of California. However, alterations and additions to a 1- to 2-story single-family residence not exceeding 1,500 square feet are currently exempt (P/BC2008-113).

As discussed more fully in Sections 3.2 and 5 of this letter, if the proposed project is treated as additions to two single-family homes, then the potential for seismic hazard impacts remains.

10. VIOLATION OF CEQA GUIDELINES SECTION 15074(d) – FAILURE TO ADOPT A MITIGATION MONITORING PROGRAM

CEQA Guidelines Section 15074(d) requires, that when:

adopting a mitigated negative declaration, the lead agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to mitigate or avoid significant environmental effects.

There is no evidence in the ZADs that a Mitigation Monitoring and Reporting Program has been adopted by the City. There is, however, evidence that the City has deferred the development of a Mitigation Monitoring and Reporting Program and made its development the responsibility of the applicant. The RMND (page 8) states:

Monitoring. Prior to the issuance of a grading or building permit, the applicant shall prepare and execute a Covenant and Agreement (Planning Department General Form CP 6770) to the satisfaction of the decision-maker, identifying mitigation monitor(s) who shall provide periodic status reports on the implementation of grading and construction phase mitigation measures to the Department of Building and Safety. The mitigation monitor(s) shall be identified as to their areas of responsibility, and phase of intervention (pre-construction, construction, post

construction maintenance) to ensure continued implementation of the above mentioned mitigation items.

The applicant therefore appears responsible for putting together a mitigation monitoring program. The City's failure to present the community with a good Mitigation Monitoring and Reporting Program prior to RMND adoption and project approval further reinforces community concerns regarding the City's poor record of monitoring and ensuring mitigation compliance.

11. VIOLATION OF CEQA GUIDELINES SECTION 15074(d) – LEGITIMATE CONCERNS REGARDING ENFORCEMENT OF MITIGATION MEASURES

Given the City's failure to follow up on code violations on the project site (see Attachments C and E) and the City's failure to adopt a mitigation monitoring plan, residents have very real concerns about the ability of the City to ensure that impacts will be less than significant.

12. VIOLATION OF CEQA GUIDELINES SECTION 15070(b)(2) – THERE IS SUBSTANTIAL EVIDENCE IN THE RECORD THAT THE PROJECT AS REVISED MAY HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT

There is substantial evidence in the record that the project will result in significant impacts. As detailed in Sections 6, 7, 8 and 9 of this letter the MND fails to provide substantial evidence that impacts can clearly be reduced to a level considered less than significant.

In contrast, a fair argument supported by substantial evidence was presented in detailed public comments on the MND and RMND. Those comment letters are incorporated herein by reference. No responses were provided by the City to these comments, some of which are summarized in Section 6 of this letter.

13 NEED TO EVALUATE ALTERNATIVES

Not only does the City need to prepare an EIR to address the potentially significant impacts of the project, the City needs to prepare an EIR to address alternatives to the project. Possible alternatives should include:

- Alternative 1 - A code conforming alternative involving the demolition of the two existing and dilapidated non-code conforming houses at 2170/2172 Stanley Hills Drive and construction of one new code-conforming house at 2170/2172 Stanley Hills Drive, and one new code-conforming house at 2166 Stanley Hills Drive.
- Alternative 2 - Given that the 2166 Stanley Hills Drive parcel is only 25 feet wide, a second alternative might be to do a lot-line adjustment between 2170/2172 Stanley Hills Drive and 2166 Stanley Hills Drive so that the two parcels are the same width, demolish the existing dilapidated houses at 2170/2172 Stanley Hills Drive, and the construct one new home on each parcel for a total of two houses.

- Alternative 3 – A No Project Alternative, which includes code enforcement at 2170/2172 Stanley Hills Drive resulting in the removal of the two vacant and dilapidated houses.
- Alternative 4 – A No Project, no action alternative.

14 CONCLUSION – THE CITY OF LOS ANGELES HAS VIOLATED CEQA GUIDELINES SECTION 15073.5(d) – AN EIR IS REQUIRED WHEN THERE IS SUBSTANTIAL EVIDENCE THAT THE PROJECT MAY HAVE A SIGNIFICANT IMPACT

This comment letter and the letters received during the public comment period on the MND and RMND demonstrate an EIR is required for the project. The lead agency has been presented with a fair argument that the project may have a significant effect on the environment and that the existing analysis and mitigation measures are inadequate, and an EIR for the project is, therefore, required.

Thank you for your consideration. Sincerely,



Susan J. O'Carroll, Ph.D.
President, Pareto Planning and Environmental Services

Attachments:

- A. Project Applications and Project Plans
- B. Notices
- C. 12/24/2007 Code Violation Information – Department of Building and Safety
- D. “Background on Stanley Hills Drive” a PowerPoint Presentation Concerning Appeal of ZADs 2013-2084 (ZAD) and 2013-2087 (ZAD) prepared by Matt Friedman
- E. Daily News Article, “Laurel Canyon Development Fight Highlights City’s Shortcomings, Residents Say, 3/6/13
- F. Permit and Inspection Report Detail, 2166 Stanley Hills Drive - Department of Building and Safety