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(213) 978-1300

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200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801
(213) 978-1271

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May 2, 2024

Los Angeles City Council
c/o Office of the City Clerk
City Hall, Room 395
Los Angeles, California 90012

Attention: PLUM Committee

Dear Honorable Members:

CEQA APPEAL CASE NO. ENV-2019-5520-MND-1A, FOR PROPERTY LOCATED AT 17538, 17544, 17550 TRAMONTO DRIVE (SHP HOUSE 1), 17532, 17540, 17548 REVELLO DRIVE (SHP HOUSE 2), 17523 AND 17529 REVELLO DRIVE (JDR HOUSE 1), AND 17533, 17537, 17541, 17547 REVELLO DRIVE (JDR HOUSE 2); CF 24-0339

On November 15, 2023, the West Los Angeles Area Planning Commission ("WLAAPC") considered appeals of four Coastal Development Permits ("CDP"), Mello Act Compliance Review ("MEL"), and three Zoning Administrator Determinations ("ZAD") for a project comprised of four separate sites. The WLAAPC issued a Determination Letter, dated February 27, 2024, denying the appeals in part and granting the appeals in part to approve a modified project as described below:

Development to occur on 12 existing lots, comprising four separate sites. The Project consists of the construction of four single-family dwellings on each site, one detached Accessory Dwelling Unit (ADU), swimming pools, decks, retaining walls, grading necessary for the residential development, remedial grading, and a 200-foot extension of Revello Drive with required grading. Total grading for the Project consists of approximately 29,148 cubic yards of earthwork, of which 28,341 cubic yards will be remedial, and a Haul Route approval for the export of 33,794 cubic yards of dirt. The Project includes a 200-foot extension of Revello Drive.

The proposed development on all four sites are as follows:

Construction of a new two-story 9,051 square-foot single family residence with a 5,887 square-foot basement, a new pool/spa with attached garage, decks, two new retaining walls, each with a maximum height of 10 feet, landscaping and hardscaping improvements, trellises, and an Accessory Dwelling Unit (ADU), located at 17538 - 17550 Tramonto Drive (Case No. DIR-2019-6352-CDP-MEL-1A, SHP House 1).

Construction of a new two-story 4,160 square-foot single-family residence with a 5,096 square-foot basement, a new pool/spa with attached garage, decks, two new retaining walls, each with a maximum height of 10 feet, landscaping and hardscaping improvements and trellises, located at 17532 - 17548 Revello Drive (Case Nos. DIR-2019-5524-CDP-MEL-1A and ZA-2019-5525-ZAD-1A, SHP House 2).

Construction of a new two-story 2,619 square-foot single-family residence with a 2,428 square-foot basement, a new pool/spa with attached garage, decks, two new retaining walls, each with a maximum height of 10 feet, landscaping and hardscaping improvements and trellises, located at 17523 - 17529 Revello Drive (Case Nos. DIR-2019-5571-CDP-MEL-1A and ZA-2019-5574-ZAD-1A, JDR House 1).

Construction of a new two-story 5,645 square-foot single-family residence with a 6,292 square-foot basement, a new pool/spa with attached garage, decks, two new retaining walls, each with a maximum height of 10 feet, landscaping and hardscaping improvements and trellises, located at 17533 - 17547 Revello Drive (Case Nos. DIR-2019-5584-CDP-MEL-1A and ZA-2019-5585-ZAD-1A, JDR House 2).

The WLAAPC approved the requested entitlements and found, pursuant to California Environmental Quality Act ("CEQA") Guidelines Section 15074(b), after consideration of the whole of the administrative record, including the Mitigated Negative Declaration ("MND"), No. ENV-2019-5520-MND, the Errata dated September 23, 2022 and November 3, 2023, and all comments received, with the imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; found the MND reflects the independent judgment and analysis of the City; found the mitigation measures have been made enforceable conditions on the project; and adopted the MND, the Mitigation Monitoring Program, and the Errata dated September 23, 2022 and November 3, 2023 prepared for the MND.

On March 12, 2024, one CEQA appeal was filed under Case No. ENV-2019-5520-MND-1A, for the MND prepared for the above referenced project. The Appellant submitted an Appeal Justification letter with their Appeal Application. The Appellant submitted an additional letter to the Council File, dated April 30, 2024, to supplement their initial letter. The following provides staff's response to the appeal points outlined in both letters.

Appeal Justification Letter, submitted March 12, 2024

The Appellant states, "The Mitigated Negative Declaration adopted by the Director of Planning is inadequate under CEQA and substantial evidence supports a fair argument that the Project may have a significant effect on the environment based on the following (to be further elaborated prior to and at the appeal hearing)." Below is a summary of the nine appeal points with a staff response for each point.

Appeal Point No. 1:

Aesthetics. The Project will have a substantial adverse effect on a scenic vista, protected by the Coastal Act, as described above, and will conflict with both the Brentwood-Pacific Palisades Community Plan regulations which protect scenic views and Coastal Act regulations and requirements regarding scenic quality. The MND makes no mention of the Coastal Act regulations or the California Coastline Preservation and Recreation Plan.

Staff Response No. 1:

Section I. of the MND analyzes the potential impacts to aesthetic qualities or resources. Subsection a. provides:

The Project site generally lacks natural features of substantial scenic value such as rugged, expansive terrain; unique rock outcroppings; natural bodies of water; or public parks. However, long broad views of the Pacific Ocean are available from Tramonto Drive, directly to the north of the Project site. Per the Brentwood-Pacific Palisades Community Plan, new hillside buildings may block views or present an unsightly view from below. The Brentwood-Pacific Palisades Community Plan requires that residential projects preserve existing views in hillside areas by strictly adhering to the adopted Citywide Hillside Ordinance (City of Los Angeles 1996) and the applicable provisions of the Zoning Code.

While the proposed development on Tramonto Drive would partially obstruct views from the public right-of-way, the new structure would not substantially affect existing expansive views of the Pacific Ocean. A View Study prepared by the Applicant (Exhibit F. of the WLAAPC Staff Recommendation Report) shows that the proposed structure on Tramonto Drive is constructed below the roadway elevation, preserving views of the ocean and coastline from the right-of-way. No scenic vistas occur onsite as the property maintains a steep downward slope from the property line. The project site is not located on or along a designated scenic highway, the nearest designated state scenic highway is State Route 27. As shown in the View Study and proposed project plans, the new structures will be constructed into the hillside and are designed to be visually compatible with the hillside area and existing structures. The public views from Tramonto Drive and the Pacific Coast Highway (PCH) would not be impacted.

As discussed in the Staff Response to Appeal Point Nos. 2-3 and 2-12 of the WLAAPC Staff Recommendation Report and Finding Nos. 1, 2, and 10 of the WLAAPC Determination Letter, the proposed development is consistent with the applicant policies of the Brentwood – Pacific Palisades Community Plan and Chapter 3 policies of the Coastal Act. Furthermore, the subject site is not listed in the California Coastline Preservation and Recreation Plan as an area that should be further studied for the purposes of landscape protection, historic preservation, or recreational opportunity. The subject site is designated as Low Residential in the Community Plan and zoned R1-1. The site is designated and zoned for residential development and not for recreational uses or conservation purposes.

The Appellant does not provide substantial evidence to support a fair argument that the project will result in a potentially significant aesthetics impact on the environment.

Appeal Point No. 2:

Air Quality. The Project will expose sensitive receptors to substantial pollutant concentrations and emissions adversely affecting a substantial number of people during construction and such impacts are not adequately analyzed.

Staff Response No. 2:

Section III. of the MND analyzes potential impacts to air quality, Appendix A of the MND includes an Air Quality Assessment prepared by Z Consulting Company, dated August 6, 2020, for the project. As discussed in the MND and Errata, construction emissions would not exceed the South Coast Air Quality Management District's (SCAQMD) thresholds of significance and would not represent a long-term source of criteria air pollutant emissions. The Appellant does not provide substantial evidence to support a fair argument that the project will result in a potentially significant air quality impact on the environment.

Appeal Point No. 3:

Geology and Soils. The MND and Geotechnical Report on which it relies fail to adequately assess the geology and soils impacts on the Project location, one of the most active landslides within the City of Los Angeles, with a long history of movement. There is no analysis provided to substantiate the conclusions reached in the MND, no slope density analysis to confirm grading amounts; no clearance requirements from proposed piles and caissons; no setback requirements from ridgelines. Expert reports set forth that the proposed construction of the retaining wall along Tramonto Drive will undermine the lateral support for the bulkhead piles which support Tramonto Drive, further putting at risk the condition of the roadway and the bulkhead which supports it. There is insufficient information provided in the file regarding the sufficiency of the proposed landslide stabilization method as the Applicant's team has not taken into account all of the relevant factors, including an adequate dewatering mechanism necessary to achieve a stabilization result. Substantial evidence supports a fair argument that the Project will have a significant impact on geology and soils resources, impacts which have not been analyzed or mitigated, in the MND.

Staff Response No. 3:

Section VII of the MND analyzes the potential impacts related to geology and soils, Appendix F of the MND provides the Geology and Soils Approval Letter issued by the Department of Building and Safety ("LADBS") Grading Division. The Geotechnical Reports prepared for the project are included in Exhibit D of the WLAAPC Staff Recommendation Report. The Appellant does not provide substantial evidence to support a fair argument that the project will have a significant effect on the environment.

During the WLAAPC appeal hearings on September 20, 2023 and November 15, 2023, representatives from the LADBS Grading Division and the Department of Public Works Bureau of Engineering (BOE) Geotechnical Engineering Division (GED) provided testimony to outline the review of Geotechnical Reports prepared by the Applicant Team and reviewed by both departments. As discussed during the WLAAPC appeal hearings and in the Determination Letter, the Geotechnical Reports prepared for the proposed grading onsite and within the public right-of-way requires review and approval by the Department of Building and Safety (LADBS) Grading Division as well as the Department of Public Works Bureau of Engineering (BOE) Geotechnical Engineering Division (GED). The City will review all grading activity occurring onsite and offsite for compliance with applicable building and zoning code regulations. The proposed development is located in a Landslide Area. All development in Landslide Areas is subject to building and zoning regulations to ensure that such development is done in a safe manner. The project includes grading activity to construct the single-family homes, structures, and roadway, but also includes required remedial grading to stabilize the landslide area of the site. Section VII of the MND analyzes the potential impacts of the project, as it relates to Geology and Soils, finding that there are "less than significant impacts" and certain impacts that could be reduced to a "less than significant level" with mitigation.

Section VII.a asks: Would the project directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving.... Iv. Landslides?

Section VII.a.i. of the MND provides:

The California Geologic Survey indicates the Project site is located within a landslide zone (CGS 2020). However, the Project will be required to implement the City-approved recommendations contained in Tramonto and Revello Geology and Soils Reports

(Appendix F). Per the City approved recommendations, the Project includes certain ground improvements that would remediate and eliminate any slope failures from occurring on the Project site. These ground improvements would consist of placing several rows of shear pins or piles at specific areas on the hillside as well as performing remedial grading to remove a certain amount of the landslide debris on the Project site. These piles would stabilize the Project site as well as support the proposed homes and roadways. Furthermore, the Project would comply with the plan review and permitting requirements of the Los Angeles Department of Building and Safety and the Bureau of Engineering. Through compliance with applicable regulatory requirements, the Project would not exacerbate, cause, or accelerate geologic hazards related to landslides. As such, the likelihood for landslide occurrence is considered low. Therefore, impacts associated with landslides would be less than significant.

As required for projects in Landslide Areas, the Applicant submitted Geotechnical Reports to the Department of Building and Safety (LADBS) Grading Division. A Geology and Geotechnical Report was prepared by Stoney-Miller Consultants, Inc., dated October 24, 2019. The LADBS Grading Division reviewed the report and previous reports prepared for the project and issued a Geology and Soils Approval Letter (Log No. 109015-04) on September 14, 2020 (MND Appendix F). The Grading Division's review and request for additional reports or modification is outlined in the Geology and Soils Approval Letter dated September 14, 2020 (Exhibit D of the WLAAPC Staff Recommendation Report) which states:

The Grading Division of the department of Building and Safety has reviewed the referenced reports that provide recommendations for the proposed stabilization of a portion of the Tramonto Landslide and construction of multi-story single family residences and retaining walls on the subject lots. In addition, Revello Drive roadway construction and stabilization are proposed and a private driveway with retaining walls is proposed within the Tramonto Drive right-of-way.

The Tramonto Landslide is one of the most active landslides within the City of Los Angeles and has a long history of movement. Previous consultants have identified historic and pre-historic landslide activity at the subject project that includes interactions with the Malibu Bowl fault, previous tectonic shearing as well as high groundwater conditions. As documented by consultants, the landslide is a series of slides as opposed to one continuous landslide with multiple rupture surfaces and internal shear surfaces. URS (2010) identified the three landslide basal or intermediate shear surfaces, two intermediate scarps as well as the uppermost scarp supported by a bulkhead that reportedly dropped approximately 40 feet.

The consultants recommend to stabilize the landslide debris with up to 9 rows of stabilization shear pin piles, lateral caissons, and to support the proposed structures on drilled-pile foundations bearing on competent bedrock...

The referenced reports are acceptable, provided the following conditions are complied with during site development:...

Furthermore, the Applicant submitted Geotechnical Reports to the BOE Geotechnical Engineering Division (GED) for review. A report titled "Project Summary/Overview: Interim and Supplement Report" was prepared by Stoney-Miller Consultants Inc., dated July 1, 2022. The GED reviewed the report and previous reports prepared for the project and issued an Interdepartmental Memo dated July 25, 2022. The Interdepartmental Correspondence stated that the proposed improvement to reconstruct portions of Revello Drive is acceptable from a

geotechnical standpoint provided the Conditions of Approval are complied with and subject to the requirements of a B Permit.

Compliance with the requirements of the various City departments, including the BOE and LADBS, will minimize risks to life and property in areas of high geologic, flood, and hazard. It will ensure stability and structural integrity and that the project will not create or contribute significantly to erosion, geological instability, or destruction of the project site or surrounding area.

The Appellant argues *a slope density analysis was not provided to confirm the grading amounts*. As outlined in Exhibit G-1 of the WLAAPC Staff Recommendation Report and testimony by LADBS Staff during the WLAAPC Appeal Hearings, the proposed grading for the new single-family dwellings and remedial grading were reviewed by LADBS and determined to be in conformance with the maximum grading quantities permitted by the requirements of LAMC Section 12.21 C.10.

The Appellant states *“no clearance requirements from proposed piles and caissons; no setback requirements from ridgelines”* was analyzed. As discussed in Section VII of the MND, Staff Response to Appeal Point Nos. 1-13 and 1-15 of the WLAAPC Staff Recommendation, and the Determination Letter, the proposed grading, including the use of piles and caissons, is subject to review and final approval by LADBS and LADBS Grading Division. As outlined in the Grading Division’s Geology and Soils Approval Letter, dated September 14, 2020, the Grading Division found the Applicant’s reports to be acceptable and outlined 65 conditions for the applicant to comply with during development. The conditions outlined in the letter include conditions to address construction of caissons, piles, and shoring for the site and structures. The project must comply with the existing regulations outlined in the Building and Zoning Code as well as the Conditions required by the Geology and Soils Approval Letter. Furthermore, as discussed in the Determination Letter, the proposed project complies with the setback requirements of the R1-1 zone and LAMC Section 12.21 C.10, which outlines requirements for single-family development in the Hillside Area.

The Appellant further states that *“expert reports set forth that the proposed construction of the retaining wall along Tramonto Drive will undermine the lateral support for the bulkhead piles which support Tramonto Drive, further putting at risk the condition of the roadway and the bulkhead which supports it. There is insufficient information provided in the file regarding the sufficiency of the proposed landslide stabilization method as the Applicant’s team has not taken into account all of the relevant factors, including an adequate dewatering mechanism necessary to achieve a stabilization result.”* As outlined in Staff Response to Appeal Point Nos. 1-13 and 1-15 of the WLAAPC Staff Recommendation and testimony by representatives from LADBS, LADBS Grading Division, and BOE-GED, the proposed retaining wall below the existing Tramonto Drive bulkhead and all grading for the proposed development is subject to review and approval by LADBS, prior to the issuance of any grading permits, and by the BOE and BOE-GED, prior to the approval of a B Permit. The LADBS Grading Division’s Geology and Soils Approval Letter, dated September 14, 2020, stated the use of “9 rows of stabilization shear pin piles, lateral caissons, and to support the proposed structures on drilled-pile foundations bearing on competent bedrock” to be acceptable in stabilizing the landslide debris on the subject site and further outlined Conditions for compliance during development, which include requirements for drainage and stabilization of the site.

As provided in Section VII of the MND, WLAAPC Staff Recommendation Report, testimony by LADBS Grading Division and BOE-GED staff, and the Determination Letter, substantial evidence such as geotechnical reports and review by the LADBS Grading Division and GED was analyzed to find that there would be less than significant impacts to Geology and Soils. The proposed

projects is required to comply with existing requirements enforced by the LADBS Grading Division and the BOE-GED to ensure the issuance of a grading permit and B permit. The MND evaluated all work (onsite and offsite) and includes mitigation measures to reduce any potential impacts to a less than significant level.

The Appellant does not provide substantial evidence to support a fair argument that the project will result in a significant impact on the environment due to the project location in a hillside area subject to landslide activity.

Appeal Point No. 4:

Hazards and Hazardous Materials. The Project poses a significant hazard to the public and the environment which will impair the response/emergency evacuation plan and routes for the approximately two hundred homes within the boundaries of the Castellammare Mesa Home Owners organization therefore also posing a significant risk of loss, injury or death involving wildland fires.

Staff Response No. 4:

Section IX. of the MND analyzes the potential impact of hazards and hazardous materials. The project is located in a Very High Fire Hazard Severity Zone ("VHFHSZ") and is subject to mandatory brush clearance requirements outlined in the Fire Code. The proposed project is subject to review and approval by the Fire Department (LAFD) to ensure compliance with the Fire Code and adequate access for emergency vehicles. As discussed during the November 15, 2023 WLAAPC appeal hearing and the documentation submitted by the Applicant (Exhibit G of the WLAAPC Staff Recommendation Report), the proposed project has been reviewed and approved by the LAFD. In addition, the projects located in Hillside Areas are required to prepare and submit a Transportation Management Plan ("TMP") for review and approval by the Department of Transportation (LADOT), provided as Appendix H of the MND. The project includes the extension of Revello Drive to the subject property and the construction of a turnaround driveway on the northside of the street for LAFD access. The Appellant does not provide substantial evidence to support a fair argument that the project will result in a significant hazards and wildfire impacts on the environment.

Appeal Point No. 5:

Hydrology and Water Quality. The Project will alter the existing drainage pattern of both the Project site and area, the details of which are not included or analyzed in the MND. As set forth in the report by geologist Eugene D. Michael, the "stabilization" method for the landslide proposed fails to consider the dewatering mechanism necessary to achieve a stabilization result. The Project, as proposed, also provides no permanent drainage infrastructure.

Staff Response No. 5:

Section X. of the MND analyzes the potential impacts to hydrology and water quality, Appendix G of the MND provides the Hydrology and Hydraulics Report. As discussed above, discussed during the November 15, 2023 WLAAPC appeal hearing, and as outlined in the Staff Response to Appeal Point No. 1-7 of the WLAAPC Staff Recommendation Report, the required grading within the right-of-way is subject to review by the Department of Public Works Bureau of Engineering Geotechnical Engineering Division (GED). The GED reviewed the reports and issued a memo dated July 25, 2022, which outlines requirements including a B Permit. Final review and approval of the roadway extension is conducted by the BOE and GED during the B Permit process; the

project is required to comply with existing regulations to ensure stabilization of the slope/site and safe construction. The GED issued a memorandum, dated July 25, 2022, responded to a request by the Planning Department to clarify the review of the Geotechnical Reports prepared by the Applicant, included as an attachment to the Errata. The memo provides a full list of all Geotechnical Reports prepared by the Applicant and reviewed by the GED, further stating the proposed work to be geotechnically feasible and outlines the required conditions for conformance.

The Appellant does not provide substantial evidence to support a fair argument that the project will result a potentially significant hydrology and water quality impact on the environment.

Appeal Point No. 6:

Land Use and Planning. As set forth above, the proposed Project is not in substantial conformance and directly conflicts with the Brentwood-Pacific Palisades Community Plan. The MND fails, at all, to discuss consistency with the Coastal Act requirements, the California Coastline Preservation and Recreation Plan and the City's Mobility Plan 2035 with which the Project inconsistent with.

Staff Response No. 6:

Section XI. of the MND analyzes the potential impacts to land use and planning. As discussed in the MND, Finding Nos. 1, 2, and 10 of the WLAAPC Determination Letter, and Staff Response to Appeal Point Nos. 2-3 and 2-12 of the WLAAPC Staff Recommendation, the proposed project is subject to and complies with the applicable requirements of the Building and Zoning Codes, is consistent with the applicable policies of the General Plan, including the Brentwood – Pacific Palisades Community Plan and Mobility Plan, and complies with the applicable policies of the Coastal Act. Furthermore, the subject site is not listed in the California Coastline Preservation and Recreation Plan as an area that should be further studied for the purposes of landscape protection, historic preservation, or recreational opportunity. The subject site is designated as Low Residential in the Community Plan and zoned R1-1. The site is designated and zoned for residential development and not for recreational uses or conservation purposes. As set forth in the Determination Letter, the WLAAPC approved a Coastal Development Permit for the proposed project, finding that the development is consistent with the Chapter 3 policies of the Coastal Act and Regional Interpretive Guidelines.

The Appellant does not provide substantial evidence to support a fair argument that the project result in a potentially significant land use impact on the environment.

Appeal Point No. 7:

Noise. There is substantial evidence in the record that the Project will cause a noise impact, in particular with regard to construction noise.

Staff Response No. 7:

Section XIII. of the MND analyzes the potential noise impacts, Appendix A of the MND includes the Noise Assessment for the project. The Noise Assessment, prepared by Z Consulting Company, dated August 6, 2020, found that the proposed construction activity will not exceed the noise thresholds of LAMC Section 112.05. Furthermore, the project will comply with the regulations outlined in the City's Noise Ordinance. The Appellant does not provide substantial evidence to support a fair argument that the project will result in a potentially significant noise impact on the environment.

Appeal Point No. 8:

Transportation. There is substantial evidence in the record that the Project will cause an unmitigated transportation impact. The Project, including the proposed construction of the retaining wall along Tramonto Drive undermining the lateral support for the bulkhead piles which support Tramonto Drive, further putting at risk the condition of the roadway and the bulkhead which supports it, and its failure to comply with the Streets and Highways Code and Mobility Plan 2035 requirements will increase hazards to and from Revello and Tramonto and result in inadequate emergency access for the homeowners in this area as further described above.

Staff Response No. 8:

Section XVII. of the MND analyzes the potential transportation impacts, Appendix H of the MND includes the Traffic Management Plan and Appendix I provides the Vehicle Miles Traveled (VMT) outputs.

As required for projects in Landslide Areas, the Applicant submitted Geotechnical Reports to the Department of Building and Safety (LADBS) Grading Division. A Geology and Geotechnical Report was prepared by Stoney-Miller Consultants, Inc., dated October 24, 2019. The LADBS Grading Division reviewed the report and previous reports prepared for the project and issued a Geology and Soils Approval Letter (Log No. 109015-04) on September 14, 2020 (MND Appendix F). The Grading Division's review and request for additional reports or modification is outlined in the Geology and Soils Approval Letter dated September 14, 2020 which states:

The Grading Division of the Department of Building and Safety has reviewed the referenced reports that provide recommendations for the proposed stabilization of a portion of the Tramonto Landslide and construction of multi-story single family residences and retaining walls on the subject lots. In addition, Revello Drive roadway construction and stabilization are proposed and a private driveway with retaining walls is proposed within the Tramonto Drive right-of-way.

The Tramonto Landslide is one of the most active landslides within the City of Los Angeles and has a long history of movement. Previous consultants have identified historic and pre-historic landslide activity at the subject project that includes interactions with the Malibu Bowl fault, previous tectonic shearing as well as high groundwater conditions. As documented by consultants, the landslide is a series of slides as opposed to one continuous landslide with multiple rupture surfaces and internal shear surfaces. URS (2010) identified the three landslide basal or intermediate shear surfaces, two intermediate scarps as well as the uppermost scarp supported by a bulkhead that reportedly dropped approximately 40 feet.

The consultants recommend to stabilize the landslide debris with up to 9 rows of stabilization shear pin piles, lateral caissons, and to support the proposed structures on drilled-pile foundations bearing on competent bedrock...

The referenced reports are acceptable, provided the following conditions are complied with during site development:...

Furthermore, the Applicant submitted Geotechnical Reports to the BOE Geotechnical Engineering Division (GED) for review. A report titled "Project Summary/Overview: Interim and Supplement Report" was prepared by Stoney-Miller Consultants Inc., dated July 1, 2022. The

GED reviewed the report and previous reports prepared for the project and issued an Interdepartmental Memo dated July 25, 2022. The Interdepartmental Correspondence stated that the proposed improvement to reconstruct portions of Revello Drive is acceptable from a geotechnical standpoint provided the Conditions of Approval are complied with and subject to the requirements of a B Permit.

Compliance with the requirements of the various City departments, including the BOE and LADBS, will minimize risks to life and property in areas of high geologic, flood, and hazard. It will ensure stability and structural integrity and that the project will not create or contribute significantly to erosion, geological instability, or destruction of the project site or surrounding area.

As provided in the MND, substantial evidence such as geotechnical reports and review by the LADBS Grading Division and GED was analyzed to find that there would be less than significant impacts to Geology and Soils. The MND evaluated all work (onsite and offsite) and includes mitigation measures to reduce any potential impacts to a less than significant level.

Therefore, the Appellant does not provide substantial evidence to support a fair argument that the project will result in any potentially significant transportation impact on the environment.

Appeal Point No. 9:

Cumulative Impacts. There is no evidence, much less substantial evidence, to support the conclusion that the “cumulative impact” of the Project will not result in any potentially significant impacts. There are no other reasonably foreseeable future projects listed and none analyzed.

Staff Response No. 9:

Section XXI. of the MND and the Erratum No. 2 dated November 3, 2023, addresses any potential cumulative impacts. Erratum No. 2 outlines the minor changes to the proposed project and updates the list of projects considered in the cumulative impact analysis. No new significant effects are identified and no new mitigation measures are required. The Appellant does not provide substantial evidence to support a fair argument that any cumulative impacts of the project will result in a potentially significant effect on the environment.

Letter from Appellant, dated April 30, 2024

Below is a summary of the ten appeal points with a staff response for each point.

Appeal Point No. 10:

1. Aesthetics. As set forth by neighborhood residents and California Coastal Commission staff, the Project will have a substantial adverse effect on a scenic vista, protected by the Coastal Act; will conflict with the aesthetic requirements set forth in the California Coastline Preservation and Recreation Plan and will conflict with the aesthetic requirements in the Brentwood-Pacific Palisades Community Plan regulations, all of which protect scenic views and impose requirements regarding scenic quality.

Despite the Coastal Act and Coastline Preservation and Recreation Plan requirements, and Coastal Commission staff's specific identification of such potential impacts, the MND fails to address the potential aesthetic impacts from caisson and/or pile exposure over the life of the development (to which, notably, the developer admits in response), just as one example. The

MND also fails to evaluate for the aesthetic loss based upon vegetation clearance and removal, and visual obstruction from public roadways.

The MND makes absolutely no mention of the Coastal Act regulations or the California Coastline Preservation and Recreation Plan despite such being a requirements for a Coastal Development Permit (see California Public Resources Code §30251).

As set forth in the Home Owners' previous submissions to the City, this Project is located immediately inland from and upslope from Pacific Coast Highway (PCH) and Will Rogers State Beach and visible therefrom. The visibility of the site requires development to be avoided, or, if unavoidable, minimized to the maximum extent possible. To the contrary, the Project includes unnecessary accessory development, sprawling basements, and loss of vegetation, all in contravention of this policy goal.

Accordingly, substantial evidence supports a fair argument that the Project may have a significant effect on aesthetics, impacts which have not been analyzed or mitigated, in the MND.

Staff Response No. 10:

The Appellant restates an appeal point from March 12th Letter. See Staff Response No. 1.

As discussed in the Staff Response to Appeal Point Nos. 2-3 and 2-12 of the WLAAPC Staff Recommendation Report and Finding Nos. 1, 2, and 10 of the WLAAPC Determination Letter, the proposed development is consistent with the applicant policies of the Brentwood – Pacific Palisades Community Plan and Chapter 3 policies of the Coastal Act. Furthermore, the subject site is not listed in the California Coastline Preservation and Recreation Plan as an area that should be further studied for the purposes of landscape protection, historic preservation, or recreational opportunity. The subject site is designated as Low Residential in the Community Plan and zoned R1-1. The site is designated and zoned for residential development and not for recreational uses or conservation purposes.

The Appellant does not provide substantial evidence to support a fair argument that the project will result in a potentially significant aesthetics impact on the environment.

Appeal Point No. 11:

2. Biology. As identified by the state of California Department of Fish and Wildlife ("CDFW"), California's Trustee Agency for fish and wildlife resources, the Project poses adverse environmental impacts on several biological resources, including monarch butterflies (a rare, threatened or endangered species under the CEQA Guidelines), the western mastiff bat, and nesting birds.

Rather than mitigating such identified impact, the MND improperly "supplements" its analysis with letter argument regarding why the MND need not include mitigation measures for these biological impacts. Disagreement among experts over the significance of an impact requires the agency to treat the environmental effect as significant and prepare an EIR. Sierra Club v. County of Sonoma (1992) 6 Cal.App.4th 1307, 1317. Failing to do so constitutes abuse of discretion.

The MND further fails to include, as specifically required by CDFW, adequate mitigation for Lemonade Berry Scrub, a Sensitive Natural Community (CDFW 2021a), listed by the California Native Plant Society as having a rarity ranking of S3.

The MND also improperly fails to analyze “environmentally sensitive habitat areas” (“ESHA”), improperly deferring such analysis in contravention of the findings in Banning Ranch Conservancy v. City of Newport Beach (2017) 2 Cal.5th 918. The Coastal Commission has stated that their ecologist has determined the potential for ESHA to exist on the site.

Finally, the MND fails to discuss the natural ecological landscape at the Project site prior to unpermitted recent disturbances, also identified by Coastal Commission staff.

Substantial evidence supports a fair argument that the Project will have a significant impact on biology, impacts which have not been analyzed or mitigated, in the MND.

Staff Response No. 11:

Section IV of the MND analyzes the potential impacts to biological resources. A Biological Resources Report and Rare Plant Survey Memorandum was prepared for the project by Dudek, dated May 27, 2021, and included as Appendix B to the MND. Section IV of the MND provides that due to the lack of special-status vegetation communities and plant and wildlife species on-site, the project would not result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Therefore, impacts associated with candidate, sensitive, or special-status species would be considered less than significant. The MND found the project would have a potential impact the lemonade berry scrub vegetation community and identified mitigation measure MM-BIO-1 to reduce any potential impact to a less than significant level. Furthermore, mitigation measures MM-BIO-2 and MM-BIO-3 were included to reduce any potential impacts related to non-native invasive plant species.

The California Department of Fish and Wildlife (CDFW) submitted a comment letter, dated September 16, 2021, during the publication period of the MND. Dudek prepared a Response Letter to the CDFW’s Comment Letter, dated October 14, 2021. The Response to Comment Letter adequately addresses the concerns raised by CDFW and the MND incorporates Mitigation Measures to reduce any potential impact to the lemonade berry scrub vegetation community to a less than significant level.

The California Coastal Commission (CCC) submitted a comment letter, dated April 13, 2022. As stated by the Appellant, the CCC’s Comment Letter identified that there may be potential for an Environmentally Sensitive Habitat Area (ESHA) to exist on the project site. However, the Comment Letter further provided that, “A more extensive analysis of the potential for ESHA will need to be conducted as part of the Coastal Commission CDP process.” The Applicant prepared a Response to Comment Letter, dated April 25, 2022, providing a history of required brush clearance on the site and included an Investigation of Potential ESHA Memorandum, prepared by Dudek, dated March 25, 2022. The Memo addressed the conditions and criteria outlined by the CCC to consider when assessing whether an area should be considered an ESHA. The Memo found that, “although lemonade berry scrub occurs onsite, the habitat has been highly altered and degraded by human disturbance and invasive species. Based on the current highly degraded status, the project site would not be suitably characterized as a relatively intact or pristine habitat that would be easily disturbed or degraded beyond its current condition. As a result, the 0.49 acre of disturbed lemonade berry scrub does not meet the criteria to be designated as an ESHA.” As such, the MND adequately analyzes the potential for ESHA to exist, finding that the site does not meet the criteria for an ESHA.

As provided in the MND, Mitigation Monitoring Plan, Errata dated September 23, 2022 and November 3, 2023, and Response to Comments included in Exhibit C. of the WLAAPC Staff Recommendation Report, the MND adequately analyzes the potential impacts to the environmental and includes mitigation measures to reduce any potential impacts to a less than significant level. The Appellant does not provide substantial evidence to support a fair argument that the project will result in a potentially significant biological impact on the environment.

Appeal Point No. 12:

3. Geology and Soils. The MND, and Geotechnical Report on which it relies, fail to adequately assess the geology and soils impacts on the Project location, one of the most active landslides within the City of Los Angeles, with a long history of movement. As set forth in the reports submitted by neighborhood residents and the Home Owners, including the reports submitted by E.D. Michael, a licensed geologist, as well as Ardashes Kazarians, a civil engineer, the Project will cause substantial adverse impacts relating to landslides; and is located on a geologic unit that is unstable and will increase instability; potentially resulting in landslide, lateral spreading, subsidence, liquefaction, or collapse. [Exhibits 1, 2].

Ardashes Kazarians sets forth that the proposed construction of the retaining wall along Tramonto Drive will undermine the lateral support for the bulkhead piles which support Tramonto Drive, further putting at risk the condition of the roadway and the bulkhead which supports it. [Exhibit 2]. Both E.D. Michael and the Coastal Commission have identified the failure to provide appropriate measures for dealing with water, both groundwater (a de-watering system) and adequate drainage/utilities, all of which has been admitted by City departments.

The proposed grading would remove substantial portions of the landslide area and the development (structures and graded areas) would occupy almost the entirety of the combined lots. In order to do so, the Project necessitates three Modifications of Building Ordinances (i.e., three deviations from otherwise applicable Code safety regulations and requirements), including one to deviate from the otherwise required safety factor of 1.5, to achieve grading "compliance" with the City's Grading Department.

There is no analysis provided to substantiate the conclusions reached in the MND, no slope density analysis to confirm grading amounts; no clearance requirements from proposed piles and caissons; no setback requirements from ridgelines.

Substantial evidence supports a fair argument that the Project will have a significant impact on geology and soils resources, impacts which have not been analyzed or mitigated, in the MND.

Staff Response No. 12:

The Appellant restates an appeal point from March 12th Letter. See Staff Response No. 3.

During the WLAAPC appeal hearings on September 20, 2023 and November 15, 2023, representatives from the LADBS Grading Division and the Department of Public Works Bureau of Engineering (BOE) Geotechnical Engineering Division (GED) provided testimony to outline the review of Geotechnical Reports prepared by the Applicant Team and reviewed by both departments. As discussed during the WLAAPC appeal hearings and in the Determination Letter, the Geotechnical Reports prepared for the proposed grading onsite and within the public right-of-way requires review and approval by the Department of Building and Safety (LADBS) Grading Division as well as the Department of Public Works Bureau of Engineering (BOE) Geotechnical Engineering Division (GED). The City will review all grading activity occurring onsite and offsite

for compliance with applicable building and zoning code regulations. The proposed development is located in a Landslide Area. All development in Landslide Areas is subject to building and zoning regulations to ensure that such development is done in a safe manner.

The Appellant refers to a “Structural Assessment Letter” prepared by Kazarians Engineering Services, dated November 1, 2023 and the “Interim Geologic Analysis of Revello/Tramonto Project” prepared by E.D. Michael, dated November 6, 2023, stating that proposed retaining wall will undermine the Tramonto Drive bulkhead and that drainage is not adequately addressed. During the November 15, 2023 WLAAPC appeal hearing, Representatives from the BOE-GED and LADBS Grading Division Applicant as well as the project engineer, from Stoney-Miller Consultants Inc. affirmed that the LADBS Grading Division reviewed the report and previous reports prepared for the project and issued a Geology and Soils Approval Letter (Log No. 109015-04) on September 14, 2020 (MND Appendix F). The Grading Division’s review and request for additional reports or modification is outlined in the Geology and Soils Approval Letter dated September 14, 2020 which states the reports are acceptable provided conditions outlined in the Letter are complied with during site development. Furthermore, the Applicant submitted a “Geotechnical Response to 2nd Party Review” Letter, prepared by Stoney-Miller Consultants Inc., dated November 13, 2023, to address the comments outlined in the letters submitted by Kazarians Engineering Services and E.D. Michael. During the November 15, 2023 WLAAPC appeal hearing, Representatives from the BOE-GED and LADBS Grading Division confirmed they had reviewed the “Geotechnical Response to 2nd Party Review” Letter, prepared by Stoney-Miller Consultants Inc. and concurred the report.

The Appellant does not provide substantial evidence to support a fair argument that the project will result in a significant impact on the environment due to the project location in a hillside area subject to landslide activity.

Appeal Point No. 13:

4. Hazards and Hazardous Materials. The Project poses a significant hazard to the public and the environment which will impair the response/emergency evacuation plan and routes for the approximately two hundred homes within the boundaries of the Home Owners' organization therefore also posing a significant risk of loss, injury or death involving wildland fires. Such potential impact was also identified by Coastal Commission staff. Nevertheless, no impact study, no evaluation of physical interference with the roads leading into and out of the area, no analysis of emergency response plans or emergency evacuation plans has been provided.

Substantial evidence supports a fair argument that the Project will have a significant impact on hazards and hazardous materials, impacts which have not been analyzed or mitigated, in the MND.

Staff Response No. 13:

The Appellant restates an appeal point from March 12th Letter. See Staff Response Nos. 4.

The Appellant does not provide substantial evidence to support a fair argument that the project will result in a significant hazards and wildfire impacts on the environment.

Appeal Point No. 14:

5. Hydrology and Water Quality. The Project will substantially alter the existing drainage pattern of both the Project site and area, the details of which are not included or analyzed in the MND.

As set forth in the report by geologist Eugene D. Michael, the "stabilization" method for the landslide proposed fails to consider the dewatering mechanism necessary to achieve a stabilization result. [Exhibit 1]. As separately submitted by the Home Owners' Evaluation Committee, the vast hydrology issues in the area which will be significantly impacted by the Projects have not been addressed.

Furthermore, the Project also provides no permanent drainage infrastructure, as also noted by Coastal Commission staff, and admitted to by the City of Los Angeles. To the contrary, the Project's proposed drainage system along Revello Drive connects to a City of Los Angeles constructed temporary drainage system on private property, meant to provide storm water drainage until the City engineered a permanent solution. [Exhibit 4]. No studies or analysis is provided in the MND regarding the sufficiency of this temporary drainage infrastructure.

Substantial evidence supports a fair argument that the Project will have a significant impact on hydrology and water quality, impacts which have not been analyzed or mitigated, in the MND.

Staff Response No. 14:

The Appellant restates an appeal point from March 12th Letter. See Staff Response Nos. 3 and 5.

The Appellant does not provide substantial evidence to support a fair argument that the project will result a potentially significant hydrology and water quality impact on the environment.

Appeal Point No. 15:

6. Land Use and Planning. As set forth above, the Project will have a substantial adverse effect on scenic vista, protected by the Coastal Act; will conflict with the aesthetic requirements set forth in the California Coastline Preservation and Recreation Plan; and will conflict with the aesthetic requirements in the Brentwood-Pacific Palisades Community Plan regulations, all of which protect scenic views and impose requirements regarding scenic quality.

The Project is also inconsistent with the Brentwood-Pacific Palisades Community Plan which provides the following goals, purposes and policies:

- *Need to minimize grading, limit land use intensity, and preserve natural topography in hillside areas;*
- *Need to protect environmentally sensitive areas, scenic views and scenic corridors;*
- *Need to restrict building on geologically sensitive areas;*
- *Limiting residential development on hillsides having more than a 15% slope;*
- *[Limiting] [construction of single-family homes that are out of scale with the character of the community;*
- *Preserving and enhancing the positive characteristics of existing residential neighborhoods while providing a variety of compatible new housing opportunities;*
- *Preserving and enhancing the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks and appearance;*
- *To preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhood;*
- *To condition new development adjacent to or in the viewshed of State parkland to protect views from public lands and roadways;*
- *To limit the intensity and density in hillside areas to that which can reasonably be accommodated by infrastructure and natural topography;*

- *Consider the steepness of the topography and the suitability of the geology in any proposal for development within the Plan area;*
- *Require that any proposed development be designed to enhance and be compatible with adjacent development; and*
- *The scenic value of natural land forms should be preserved, enhanced and restored. Wherever feasible, development should be integrated with and be visually subordinate to natural features and terrain. Structures should be located to minimize intrusion into scenic open spaces by being clustered near other natural and manmade features such as tree masses, rock outcrops and existing structures.*

The Project is in direct conflict with all of the above Brentwood-Pacific Palisades Community Plan goals, purposes, and policies. As set forth in the City's own Geology Soils Approval Letter for the Project, the Project is located in one of the most active landslides within the City of Los Angeles and has a long history of movement. Despite these realities, the Project proposes four sprawling basements; two of the basements are larger than the above ground portions of the home. The construction of the retaining wall, as proposed along Tramonto Drive, will undermine the lateral support for the bulkhead piles which support Tramonto Drive, further putting at risk the condition of the roadway and the bulkhead which supports it. There is insufficient information provided in the file regarding the sufficiency of the proposed landslide stabilization method as the Applicant's team has not taken into account all of the relevant factors, including an adequate dewatering mechanism necessary to achieve a stabilization result.

It is important to note that, as worded in the MND, it sounds as though the total grading is 29,148 cubic yards. It is not. As confirmed by geologist Eugene D. Michael, total grading (i.e., the total volume of material excavated) is 62,942 cubic yards, even though after replacement by filling 29,148 cubic yards will remain on site.

The proposed grading would remove substantial portions of the landslide area and the development (structures and graded areas) would occupy almost the entirety of the combined lots. In order to do so, the Project necessitates three Modifications of Building Ordinances (i.e., three deviations from otherwise applicable Code safety regulations and requirements), including one to deviate from the otherwise required safety factor of 1.5, to achieve grading "compliance" with the City's Grading Department.

The Project utterly fails to minimize grading or to limit the intensity and density in hillside areas to that which can reasonably be accommodated by infrastructure and natural topography. It does not even provide permanent drainage infrastructure. Its impacts on natural topography and existing infrastructure, including the roadways and drainage systems, are not only unreasonable and dangerous, but in conflict with applicable land use and planning regulations and policies.

In order to be legally adequate under CEQA, an MND cannot selectively pick and choose policies with which it deems a project to be consistent, but must identify and discuss all noted inconsistencies. CEQA Guidelines §15125(d); L.A. CEQA Thresholds Guide.

Substantial evidence supports a fair argument that the Project will have a significant impact on land use and planning, impacts which have not been analyzed or mitigated, in the MND.

Staff Response No. 15:

The Appellant restates an appeal point from March 12th Letter. See Staff Response Nos. 3, 6, and 12.

The Appellant does not provide substantial evidence to support a fair argument that the project result in a potentially significant land use impact on the environment.

Appeal Point No. 16:

7. Noise. There is substantial evidence in the record that the Project will cause a noise impact, in particular with regard to construction noise. Such impacts are analyzed by Steve Rogers Acoustics. [Exhibit 3].

Staff Response No. 16:

The Appellant restates an appeal point from March 12th Letter. See Staff Response No. 7.

The Appellant does not provide substantial evidence to support a fair argument that the project will result in a potentially significant noise impact on the environment.

Appeal Point No. 17:

8. Transportation. There is substantial evidence in the record that the Project will cause a transportation impact. The MND is insufficient for all of the reasons set forth by MAT Engineering. [Exhibit 5].

Furthermore, the Project, including the proposed construction of the retaining wall along Tramonto Drive will undermine the lateral support for the bulkhead piles which support Tramonto Drive, putting at risk the condition of the roadway and the bulkhead which supports it. [Exhibit 2]. It fails to comply with the Streets and Highways Code for street vacation and Mobility Plan 2035 requirements, thereby increasing hazards to and from Revello and Tramonto and results in inadequate emergency access for the homeowners in this area as further described above and in comments from various groups and agencies regarding wildfire and transportation.

Substantial evidence supports a fair argument that the Project will have a significant impact on transportation, impacts which have not been analyzed or mitigated, in the MND.

Staff Response No. 17:

The Appellant restates an appeal point from March 12th Letter. See Staff Response No. 8.

Therefore, the Appellant does not provide substantial evidence to support a fair argument that the project will result in any potentially significant transportation impact on the environment.

Appeal Point No. 18:

9. Utilities and Service Systems. The Project provides no permanent drainage infrastructure and no information regarding how distributions conduits, systems, storage facilities, metering or billing would be made available, as also noted by Coastal Commission staff, and admitted to by the City of Los Angeles. To the contrary, the Project's proposed drainage system along Revello Drive connects to a City of Los Angeles constructed temporary drainage system on private property, meant to provide storm water drainage until the City engineered a permanent solution. [Exhibit 4]. Adequate studies or analysis are not provided in the MND regarding the sufficiency of this temporary drainage infrastructure, or any other infrastructure for that matter. To the contrary, there

is only evidence that the infrastructure is insufficient.

Substantial evidence supports a fair argument that the Project will have a significant impact on utilities and service systems, impacts which have not been analyzed or mitigated, in the MND.

Staff Response No. 18:

Section XIX of the MND analyzes the potential impacts related to utilities and service systems. The Appellant makes a general claim that the proposed drainage system is insufficient. As discussed in the WLAAPC Staff Recommendation Report, by City Staff during the November 15, 2023 WLAAPC appeal hearing, and in the Determination Letter, the project is required to comply with existing Building and Zoning Code requirements that regulate development of residential structures in hillside areas. The project and proposed drainage system is subject to review and approval by the LADBS Grading Division and BOE-GED. As confirmed by City Staff during the WLAAPC appeal hearing, the required permits will not be issued until the project meets the requirements outlined by LADBS and BOE regarding onsite and offsite drainage.

The Appellant restates appeal points outlined in the March 12th Letter. See Staff Response Nos. 3 and 5.

The Appellant does not provide substantial evidence to support a fair argument that the project will result in any potentially significant impact on the environment due to utilities or service systems.

Appeal Point No. 19:

10. Wildfire. The Project is located in CAL FIRE's Fire Hazard Severity Zone. Nevertheless, the Project poses a significant hazard to the public and the environment which will impair the response/emergency evacuation plan and routes for the approximately two hundred homes within the boundaries of the Home Owners' organization therefore also posing a significant risk of loss, injury or death involving wildland fires, particularly during construction. Such potential impact was also identified by Coastal Commission staff and is elaborated in the report by MAT Engineering. [Exhibit 5]. Nevertheless, no impact study, no evaluation of physical interference with the roads leading into and out of the area, no analysis of emergency response plans or emergency evacuation plans has been provided.

Substantial evidence supports a fair argument that the Project will have a significant impact on wildfire, impacts which have not been analyzed or mitigated, in the MND.

Staff Response No. 19:

Section XX. of the MND analyzes potential impacts related to wildfire. As discussed in the Staff Response to Appeal Point Nos. 1-10 and 1-18 of the WLAAPC Staff Report and during the WLAAPC appeal hearing, the project is located in a Very High Fire Hazard Severity Zone ("VHFHSZ") and is subject to existing requirements for new development in the VHFHSZ. Furthermore, the project includes the reconstruction of a portion of Revello Drive and the construction of a turnaround to allow for LAFD access. The proposed project is subject to review and approval by the Fire Department (LAFD) to ensure compliance with the Fire Code and adequate access for emergency vehicles. As discussed during the November 15, 2023 WLAAPC appeal hearing and the documentation submitted by the Applicant (Exhibit G of the WLAAPC Staff Recommendation Report), the proposed project has been reviewed and approved by the LAFD.

The Appellant restates appeal points outlined in the March 12th Letter. See Staff Response No. 4.

The Appellant does not provide substantial evidence to support a fair argument that the project will result in any potentially significant impact on the environment due to Wildfires.

Conclusion

Planning Staff recommends the PLUM Committee and City Council deny the CEQA Appeal and find, pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including the Mitigated Negative Declaration, No. ENV-2019-5520-MND ("Mitigated Negative Declaration"), Errata dated September 23, 2022 and November 3, 2023, and all comments received, with the imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; find the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; find the mitigation measures have been made enforceable conditions on the project; and adopt the Mitigated Negative Declaration, Mitigation Monitoring Program prepared for the Mitigated Negative Declaration, and the Errata dated September 23, 2022 and November 3, 2023 prepared for the Mitigated Negative Declaration.

Sincerely,

VINCENT P. BERTONI, AICP
Director of Planning


Juliet Oh
Senior City Planner

VPB:TLI:JO