

October 19, 2018

Planning & Land Use Management Committee
Los Angeles City Hall
200 N Spring St.,
Los Angeles, CA 90012

Re: 6400 W. Sunset Boulevard & 1419 N. Ivar Avenue
Case No.: ENV-2016-3631-SCPE
and
Case No.: ENV-2016-3631-EIR

Dear Members of the PLUM Committee,

I am writing to offer comments on the proposed project for 6400 W. Sunset Boulevard & 1419 N. Ivar Avenue, Case Numbers ENV-2016-3631-SCPE & Case No.: ENV-2016-3631-EIR. My first comment is that I am honestly baffled by the bizarre approach that the applicant and the Department of City Planning (DCP) have chosen to take on this project. Back in August 2017 the City posted a notification that an Initial Study had been completed and held a scoping meeting as part of the process of preparing an EIR. Now the applicant and the DCP have suddenly changed course and are trying to rush it through as a Sustainable Communities (SC) project.

Unfortunately, a look at PRC 21155.1 shows the proposed mixed-use high-rise does not qualify as an SC project, because it does not meet all of the criteria listed. In addition, the original NOP, as well as the current description on ZIMAS, include a request for an MCUB covering 4 establishments serving alcohol. While this information is conveniently missing from the PLUM notice, it's unlikely that the developer has dropped this request. More likely the DCP, as it has in the past, has failed to include important information, possibly because it could slow approval of the proposed project.

The PLUM must refuse to consider the proposed high-rise at 6400 Sunset as an SC project for the following reasons:

1. UTILITIES

PRC 21155.1 states that the legislative body must find that:

The transit priority project and other projects approved prior to the approval of the transit priority project but not yet built can be adequately served by existing utilities [...]

In addition to this 26-story high-rise proposed for 6400 Sunset...

- A 19-story hotel has been approved for 6407 Sunset, directly across the street;
- A 220-room hotel is under construction at 1400 Cahuenga, directly behind the project site;
- A mixed-use building with 369 apartments is under construction at 1311 Cahuenga just one block south of the project site;
- The Academy, a mixed-use project occupying a full city block, including a 20-story residential tower and 4 mid-rise buildings, is under construction at De Longpre and Vine, just south and east of the project site;
- Two 30-story mixed-use towers at 6215 Sunset have been approved, just two blocks east of the project site.

According to a survey prepared by the LA Times, it appears that there were 5 water main ruptures on Cole and 1 on Cahuenga between Sunset and Santa Monica between 2010 and 2014. [See Attachment A.]

Los Angeles Water Main Leaks Since 2010 from LA Times

<http://graphics.latimes.com/los-angeles-pipe-leaks/>

More recently, a major break occurred on July 31, 2017 at Cahuenga and Willoughby. [See Attachment B.]

The Times map also appears to indicate that the mains running along Sunset, Cahuenga and Cole in this area are all over 75 years old. It is hard to see how the City can make a finding that the proposed project can be adequately served by existing utilities. The water infrastructure can't even reliably serve the area's existing population, let alone the massive amount of new development that the DCP has approved.

2. HISTORIC RESOURCES

PRC 21155.1 also states that the legislative body must find that:

The transit priority project does not have a significant effect on historical resources pursuant to PRC Section 21084.1.

Section 21084.1 says that a project is deemed to have a significant effect if it may cause....

[A] substantial adverse change in the significance of an historical resource [...]

Section 21084.1 goes on to say that....

The fact that a resource is not listed in, or determined to be eligible for listing in, the California Register of Historical Resources, not included in a local register of historical resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1 shall not preclude a lead agency from determining whether the resource may be an historical resource for purposes of this section.

The project site is currently occupied by Amoeba Music. Amoeba IS a historic resource. While the building certainly isn't much to look at, it clearly satisfies two of the criteria

1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.
2. Associated with the lives of persons important to local, California or national history.

Amoeba became a crucial part of LA's music scene from the time it opened in 2001, and there's no denying it's an important cultural resource. And it would be hard to count the number of musicians who have performed at Amoeba who are important on the local, national, or global music scene. Here's a small selection....

Corinne Bailey Rae, Tomahawk, Nancy Sinatra, Lila Downs, Queens of the Stone Age, Nels Cline, Flaming Lips, Robyn Hitchcock, The Melvins, Blind Boys of Alabama, Daniel Lanois, MeShell N'Degeocello, Los Lobos, L7, Conor Oberst, Bob Weir, Mariachi Voz de America, Chrissie Hynde, The Bots, and Ozomatli.

It's clear that Amoeba should be considered a historic/cultural resource, and that's its demolition would have a "significant effect on historical resources" in Hollywood.

3. HAZARDOUS SUBSTANCES

PRC 21155.1 states:

The site of the transit priority project is subject to a preliminary endangerment assessment prepared by an environmental assessor to determine the existence of any release of a hazardous substance on the site and to determine the potential for exposure of future occupants to significant health hazards from any nearby property or activity.

If a preliminary endangerment assessment has been done, it would surely have revealed that the southern portion of the site was occupied from the 20s through the 50s by Muller Bros. Gas Station and Service Center. [See Attachments C - H] The Muller Bros. offered a range of services aside from pumping gas, including auto repair, lube, and auto body painting. Car batteries were also stored on the site. While the gas pumps were located across Ivar, LADBS records show that the rear portion of the two parcels that make up 6400 Cahuenga, 1453 Ivar and 1450 Cahuenga, were used for car storage and repair. I'm sure the members of the PLUM Committee are aware of the toxic chemicals contained in gasoline, which included lead up until the 70s. In the years that Muller Bros. operated, auto body paint also contained lead.

The project site was actually bookended on both sides by gas stations. The Muller Bros. pumped gas at 6380 Sunset and a competitor pumped gas at 6424 Sunset. [See Attachments I & J.] If a preliminary endangerment assessment has been completed, perhaps it has documented whether the underground storage tanks at these sites were ever removed, or if they remain buried. Since migration is fairly common, the soil needs to be assessed to see if it contains toxic chemicals. While the developers plan only to excavate the northern portion of the site, testing must be done to rule out the possibility of contamination.

4. MASTER CUB

When the NOP for this project was distributed in August 2017, it included a request for the following entitlement:

Master Conditional Use Permit to allow the on-site sale and consumption of a full-line of alcoholic beverages within up to four premises in up to 7,000 square feet of commercial use.

The description of this project currently on ZIMAS also includes the request for an MCUB covering four establishments.

It is deeply disturbing that the DCP has chosen to omit this information from the notice for the PLUM hearing. There seems to be no doubt that the applicant fully intends to ask for the MCUB. The request appears to have been omitted in order to avoid environmental review.

The request for a liquor permit is a discretionary action and triggers environmental review under CEQA.

For the reasons given above, this project does not fulfill the requirements contained in PRC 21155.1, and cannot be considered a Sustainable Communities project. It is therefore subject to environmental review under CEQA.

Thank you for your time.

Casey Maddren
2141 Cahuenga, Apt. 17
Los Angeles, CA 90068

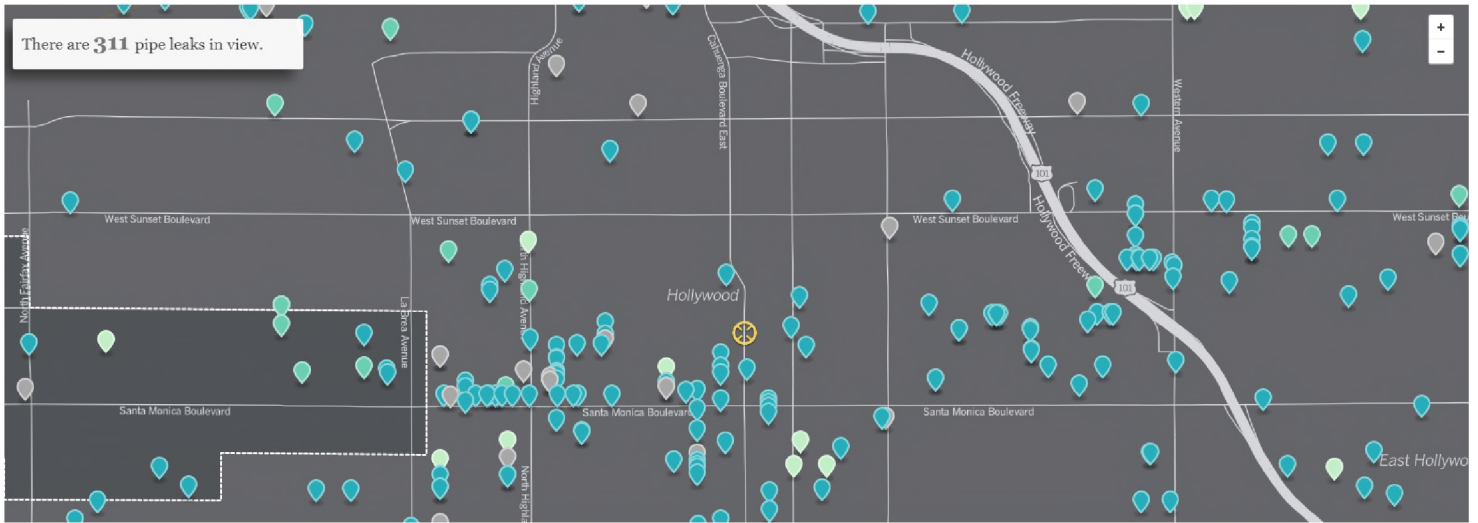
cc:
Sergio Ibarra, City Planner, Department of City Planning
Craig Bullock, CD 13 Planning Deputy

Los Angeles water main leaks since 2010

Know of a leak that isn't on the map? Let us know [here](#).

or

Pipe age: 6% less than 50 years old 5% between 50 and 75 75% between 75 and 100 7% more than 100 7% age unavailable



Water Main Break Shuts Down Cahuenga Blvd. In Hollywood

July 31, 2017 at 5:38 am Filed Under: [Hollywood](#)



HOLLYWOOD (CBSLA.com) – A pipe break sent thousands of gallons of water gushing into the roadway and shut down a major Hollywood thoroughfare Monday morning.



A water main break on Cahuenga Boulevard in Hollywood, Calif. July 31, 2017. (ANG News)

At about 1:30 a.m., a 12-inch water main burst in the area of Cahuenga Boulevard and Willoughby Avenue, near the 2 Freeway.

A witness told CBS2 he heard a loud pop, and the came outside to find water gushing

everywhere.

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Los Angeles Department of Water and Power crews arrived and shut off the water, but said repairs were likely to take well into Monday afternoon.

Cahuenga Boulevard was closed in both directions as of noon. Drivers were advised to avoid the area.

The pipe was built in the 1930s, LADWP said, and age may have been a factor in the break. The cause of the break remains unknown.

The busy stretch of Cahuenga Boulevard contains several businesses. The Cahuenga Pet Hospital was forced to close for the day due to the fact that patients would be unable to access the hospital. There were no reports of water damage, however. Some businesses in the area were without water service. The exact number was not confirmed.



Kara Finnstrom
@KaraFinnstrom

Heavy equipment arrives for cleanup of #water main break on #Cahuenga in #Hollywood @CBSLA
6:28 AM - Jul 31, 2017

2 See Kara Finnstrom's other Tweets



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Comments



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All Applications Must be Filled Out by Applicant

PLANS AND SPECIFICATIONS and other data must also be filed

Bldg. Form 3

3

CITY OF LOS ANGELES DEPARTMENT OF BUILDING AND SAFETY BUILDING DIVISION

Application to Alter, Repair or Demolish

To the Board of Building and Safety Commissioners of the City of Los Angeles:
 Application is hereby made to the Board of Building and Safety Commissioners of the City of Los Angeles, through the office of the Superintendent of Building, for a building permit in accordance with the description and for the purpose hereinafter set forth. This application is made subject to the following conditions, which are hereby agreed to by the undersigned applicant and which shall be deemed conditions entering into the exercise of the permit:
 First: That the permit does not grant any right or privilege to erect any building or other structure therein described, or any portion thereof, upon any street, alley, or other public place or portion thereof.
 Second: That the permit does not grant any right or privilege to use any building or other structure therein described, or any portion thereof, for any purpose that is, or may hereafter be prohibited by ordinance of the City of Los Angeles.
 Third: That the granting of the permit does not affect or prejudice any claim of title to, or right of possession in, the property described in such permit.

TAKE TO ROOM No. 248 (2ND FLOOR) CITY CLERK PLEASE VERIFY	REMOVED FROM	REMOVED TO	O. K. City Clerk Deputy
	Lot <u>15</u> Block _____	Lot _____ Block _____	
TAKE TO ROOM No. 5 (MAIN ST. FLOOR) ENGINEER PLEASE VERIFY	Tract <u>1198</u>	Tract _____	O. K. City Engineer Deputy
	Book _____ Page _____ F. B. Page _____	Book _____ Page _____ F. B. Page _____	
	From No. <u>1450 Cahuenga Blvd</u>	Street _____	
	To No. <u>36' 50' on of Sunset Blvd</u>	Street _____	

(USE INK OR INDELIBLE PENCIL) Repair and Storage

1. What purpose is the present Building now used for? Repair and Storage
2. What purpose will Building be used for hereafter? Same
3. Owner's name Muller Bros Phone _____
4. Owner's address 6390 Sunset Blvd
5. Architect's name Not to be filled in unless with name of Certificated Architect or Licensed Engineer under State Act Phone _____
6. Contractor's name Harman Pacific Co Phone Mutual 5177
7. Contractor's address 422 E 3rd St L.A.
8. VALUATION OF PROPOSED WORK {including all Material, Labor, Finishing, Equipment and Appliances in Completed Building.} \$ 175.00
9. Class of present Building Frame No. of rooms at present one
10. Number of stories in height one Size present Building 22 x 75
11. State how many buildings are on this lot 1 one
12. State purpose buildings on lot are used for 1 Repair and Storage
(Apartment House, Hotel, Residence, or any other purpose.)

13. What Zone is Property in? _____
 STATE ON FOLLOWING LINES EXACTLY WHAT ALTERATIONS, ADDITIONS, ETC., WILL BE MADE TO THIS BUILDING:
Cut fifteen feet off Cahuenga St end as ordered by city

I have carefully examined and read the above application and know the same is true and correct, and that all provisions of the Ordinances and Laws governing Building Construction will be complied with, whether herein specified or not.

OVER 4/24/30 330 (Sign here) M. B. White
 (Owner or Authorized Agent.)

PERMIT NO. 9507	Plans and Specifications checked and found to conform to Ordinances, Laws, etc. <u>Muller Bros</u> Plan Examiner	Application checked and found O.K. <u>4/24/30</u> <u>330</u> <u>M. B. White</u> Clerk	Stamp: RECEIVED APR 26 1930 1000 A. Bldg. Dept.
	FOR DEPARTMENT USE ONLY		

4-26 H. Owens 100

ZIMAS

Search: 1450 N CAHUENGA BLVD

Font: A A A

Address/Legal

Site Address	1456 N CAHUENGA BLVD
Site Address	1450 N CAHUENGA BLVD
Site Address	1458 N CAHUENGA BLVD
Site Address	1460 N CAHUENGA BLVD
Site Address	6408 W SUNSET BLVD
Site Address	6408 W SUNSET BLVD
Site Address	6414 W SUNSET BLVD
Site Address	6410 W SUNSET BLVD
Site Address	6408 1/2 W SUNSET BLVD
ZIP Code	90028
PIN Number	147A187 150
Lot/Parcel Area (Calculated)	10,811.2 (sq ft)
Thomas Brothers Grid	PAGE 593 - GRID F5
Assessor Parcel No. (APN)	5546014958
Tract	TR 1996
Map Reference	M 6 22-108
Block	None
Lot	13
Arb (Lot Cut Reference)	None
Map Sheet	147A187

Jurisdictional

Select Parcels

Show total area for selected parcels

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0.04 Miles 200 Feet

Desktop 9:45 PM 10/16/2018

3

APPLICATION TO ALTER, REPAIR, or DEMOLISH AND FOR A Certificate of Occupancy

CITY OF LOS ANGELES DEPARTMENT OF BUILDING AND SAFETY BUILDING DIVISION

Lot No. 147 Tract 1998 Location of Building 1453 N. IVAR ST HOLLYWOOD

Between what cross streets? CHAVEZ AVENUE SOUTH BATH STREET BLVD. APPROVED BY CITY ENGINEER DEPUTY

- 1. Present use of building: AUTO REPAIR SHOP... 2. State how long building has been used for present occupancy: 4... 3. Use of building AFTER alteration or moving: SAME... 4. Owner: MARIAN GAY, ROBERT E. KOPP, NORMAN R. KYRE... 5. Owner's Address: 1680 N. VENTURA... 6. Certificated Architect: BURTON A. SCHUTT... 7. Licensed Engineer: SAM SCHULTZ... 8. Contractor: BUCKEY V. VYATT... 9. Contractor's Address: 16430 VENTURA BLVD. ENCINO... 10. VALUATION OF PROPOSED WORK: \$21,597.00... 11. State how many buildings NOW on lot and give use of each: 1 GARAGE TO ATTORNEYS OFFICE... 12. Size of existing building: 23' x 33'... 13. Material Exterior Walls: MASONRY (EXISTING) Exterior framework: STEEL

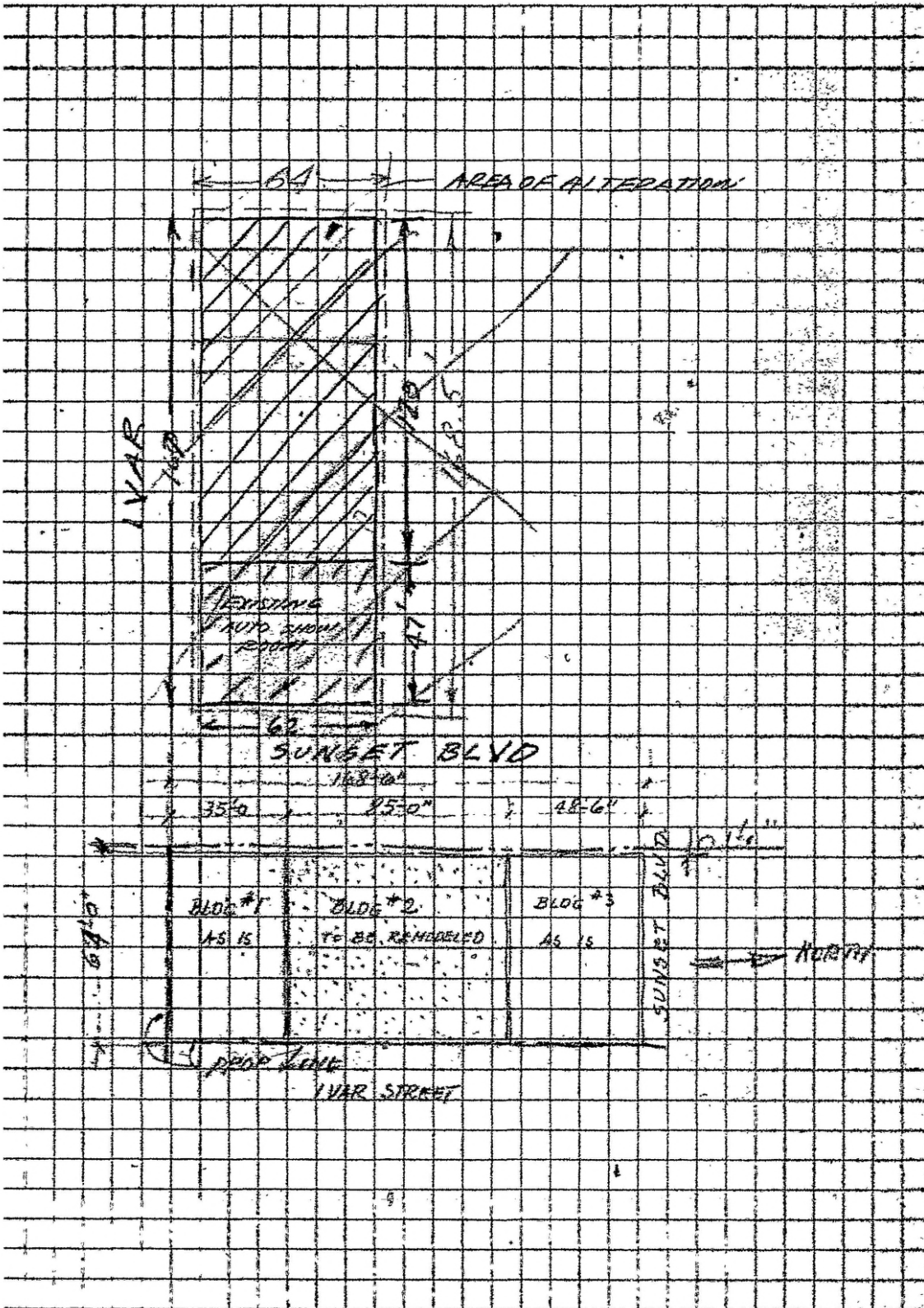
14. Describe briefly all proposed construction and work: ALTER GARAGE TO ATTORNEYS OFFICE. INSTALL STEEL BRACING SYSTEM AS SHOWN ON SHEET #2 OVER BOTTOM CHORDS OF ALL EXISTING ROOF TRUSSES... RENOVATED ELDER 1 - 60% NEW CONSTRUCTION

I hereby certify that to the best of my knowledge and belief the above application is correct and that this building or construction work will comply with all laws, and that in the doing of the work authorized thereby I will not employ any person in violation of the Labor Code of the State of California relating to Workmen's Compensation Insurance.

DISTRICT OFFICE Sign here E. J. MILLER (Owner or Authorized Agent)

Table with columns: PLAN CHECKING, OCCUPANCY SURVEY, Valuation, Area of Bldg., Investigation Fee, Cert. of Occupancy Fee, Bldg. Permit Fee, Total. Includes sub-tables for TYPE, GROUP, and SPRINKLER.

Table with columns: TYPE OF RECEIPT, DATE ISSUED, TRACE NO. (M), RECEIPT NO., CODE, FEE PAID. Includes rows for Plan Checking, Supplemental Plan Checking, and Building Permit.



APPROVED FOR
 H.D.T. JUL 5 1951
 NO NEW CONSTRUCTION TO BE BUILT

1

APPLICATION TO ERECT A NEW BUILDING AND FOR A Certificate of Occupancy

CITY OF LOS ANGELES DEPARTMENT OF BUILDING AND SAFETY BUILDING DIVISION

Lot No. No. 100' of 10 + 11

Tract 1998

Location of Building 6424 Sunset Blvd

Approved by City Engineer Deputy

Between what cross streets? Cahuenga + Cole

USE INK OR INDELIBLE PENCIL

- 1. Purpose of building Type IV Wash Rack (Auto)
2. Owner Delbert K. Jensen
3. Owner's Address 6424 Sunset Blvd
4. Certificated Architect
5. Licensed Engineer John E. Shield
6. Contractor Owner
7. Contractor's Address

8. VALUATION OF PROPOSED WORK 300000

9. State how many buildings NOW on lot and give use of each 4 (Garage, Wash Rack, 2 Gas Pump Groups)

10. Size of new building 12 x 19 No. Stories 1 Height to highest point 4'8" Size lot 100 x 100

11. Material Exterior Walls No walls Type of Roofing G.I. F

- 12. Accessory Buildings and similar structures (a) Footing: Width 2' Depth in Ground 4' Width of Wall
(b) Size of Studs Material of Floor Concrete
(c) Size of Floor Joists x Size of Ralters Truss x

I hereby certify that to the best of my knowledge and belief the above application is correct and that this building or construction work will comply with all laws...

DISTRICT OFFICE MAINTENANCE ROOM WAD Sign here John E. Shield (Owner or Authorized Agent) By

Table with columns: Valuation, Fee, TYPE, GROUP, For Plans Sec, Fld Wks, Maximum No. Occupants, Inside Lot, Corner Lot, Plans and Specifications checked, Obstruction Verified, Mags. Line, Key Lot, Corner Lot Keyed, Zone, Customary Inspection, Lot Size, Free District, No., Street Widening, Investigation Fee, Bldg. Permit Fee, Total, Pt. rear alley, Pt. side alley, District, No., Street, Area, Inspector

Table with columns: TYPE OF RECEIPT, DATE ISSUED, TRACER NO. (M), RECEIPT NO., CODE, FEE PAID. Rows: Plan Checking, Supplemental Plan Checking, Building Permit

