

ORIGINAL



APPLICATIONS:

APPEAL APPLICATION

This application is to be used for any appeals authorized by the Los Angeles Municipal Code (LAMC) for discretionary actions administered by the Department of City Planning.

1. APPELLANT BODY/CASE INFORMATION

Appellant Body:

- Area Planning Commission, City Planning Commission, City Council, Director of Planning

Regarding Case Number: CPC-2013-2551-MCUP-DB-SPR, ENV-2013-2552 EIR

Project Address: 8142-8182 W Sunset Blvd, 1438-1486 N. Havenhurst Drive, 1438-1443 N. Crescent Heights Blvd

Final Date to Appeal: 08/29/2016

- Type of Appeal: Appeal by Applicant/Owner, Appeal by a person, other than the Applicant/Owner, claiming to be aggrieved, Appeal from a determination made by the Department of Building and Safety

2. APPELLANT INFORMATION

Appellant's name (print): Laurel Canyon Association

Company: Laurel Canyon Association

Mailing Address: 8453 Kirkwood Drive

City: Los Angeles State: CA Zip: 90046

Telephone: (310) 982-1760 E-mail: jhall@laurelcanyon.org

- Is the appeal being filed on your behalf or on behalf of another party, organization or company?

Self, Other:

- Is the appeal being filed to support the original applicant's position? Yes, No

3. REPRESENTATIVE/AGENT INFORMATION

Representative/Agent name (if applicable): Jamie T Hall

Company: Channel Law Group, LLP

Mailing Address: 8200 Wilshire Blvd, Suite 300

City: Beverly Hills State: CA Zip: 90211

Telephone: (310) 982-1760 E-mail: jamie.hall@channellawgroup.com

4. JUSTIFICATION/REASON FOR APPEAL

Is the entire decision, or only parts of it being appealed? Entire Part
 Are specific conditions of approval being appealed? Yes No

If Yes, list the condition number(s) here: _____

Attach a separate sheet providing your reasons for the appeal. Your reason must state:

- The reason for the appeal
- Specifically the points at issue
- How you are aggrieved by the decision
- Why you believe the decision-maker erred or abused their discretion

5. APPLICANT'S AFFIDAVIT

I certify that the statements contained in this application are complete and true:

Appellant Signature: _____

Date: 08/29/2016

6. FILING REQUIREMENTS/ADDITIONAL INFORMATION

- Eight (8) sets of the following documents are required for each appeal filed (1 original and 7 duplicates):
 - Appeal Application (form CP-7769)
 - Justification/Reason for Appeal
 - Copies of Original Determination Letter
- A Filing Fee must be paid at the time of filing the appeal per LAMC Section 19.01 B.
 - Original applicants must provide a copy of the original application receipt(s) (required to calculate their 85% appeal filing fee).
- All appeals require noticing per the applicable LAMC section(s). Original Applicants must provide noticing per the LAMC, pay mailing fees to City Planning's mailing contractor (BTC) and submit a copy of the receipt.
- Appellants filing an appeal from a determination made by the Department of Building and Safety per LAMC 12.26 K are considered Original Applicants and must provide noticing per LAMC 12.26 K.7, pay mailing fees to City Planning's mailing contractor (BTC) and submit a copy of receipt.
- A Certified Neighborhood Council (CNC) or a person identified as a member of a CNC or as representing the CNC may not file an appeal on behalf of the Neighborhood Council; persons affiliated with a CNC may only file as an individual on behalf of self.
- Appeals of Density Bonus cases can only be filed by adjacent owners or tenants (must have documentation).
- Appeals to the City Council from a determination on a Tentative Tract (TT or VTT) by the Area or City Planning Commission must be filed within 10 days of the date of the written determination of said Commission.
- A CEQA document can only be appealed if a non-elected decision-making body (ZA, APC, CPC, etc.) makes a determination for a project that is not further appealable. [CA Public Resources Code ' 21151 (c)].

This Section for City Planning Staff Use Only		
Base Fee: <u>\$ 89</u>	Reviewed & Accepted by (DSC Planner): <u>Norali Martinez</u>	Date: <u>9/1/16</u>
Receipt No: <u>0102628033</u>	Deemed Complete by (Project Planner):	Date:
<input checked="" type="checkbox"/> Determination authority notified		<input type="checkbox"/> Original receipt and BTC receipt (if original applicant)

Office: Downtown
Applicant Copy
 Application Invoice No: 31840

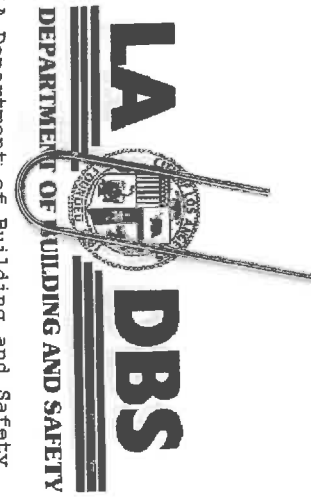
City of Los Angeles
 Department of City Planning



City Planning Receipt

NOTICE: The staff of the Planning Department will analyze your request and your application, regardless of whether or not you obtain the

This filing fee is required by Chapter 1,



LA Department of Building and Safety
 LA DAVI 102083679 9/1/2016 3:38:55 PM
 Receipt #: 0102628033

Total: \$106.80
 Check #106.80

Applicant: LAUREL CANYON ASSOCIATION
Representative: HALL, JAMIE (B:310-9821760)
Project Address: 1435 1/2 N CRESCENT HEIGHTS BLVD, 90046

NOTES:

GPC-2013-2551-CUB-DB-SPR-2A			
Item	Fee	%	Charged Fee
Appeal by Aggrieved Parties Other than the Original Applicant *	\$89.00	100%	\$89.00
Case Total			\$89.00

Item	Charged Fee
*Fees Subject to Surcharges	\$89.00
Fees Not Subject to Surcharges	\$0.00
Plan & Land Use Fees Total	\$89.00
Expediting Fee	\$0.00
OSS Surcharge (2%)	\$1.78
Development Surcharge (6%)	\$5.34
Operating Surcharge (7%)	\$6.23
General Plan Maintenance Surcharge (5%)	\$4.45
Grand Total	\$106.80
Total Invoice	\$106.80
Total Overpayment Amount	\$0.00
Total Paid (this amount must equal the sum of all checks)	\$106.80

LA Department of Building and Safety
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PLAN & LAND USE \$106.80
 Sub Total \$106.80

Receipt #: 0102628033

Council District: 5
 Plan Area: Hollywood
 Processed by MARTINEZ MAZA, NORALI on 09/01/2016

Signature:



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

September 1, 2016

VIA PERSONAL DELIVERY

City of Los Angeles
Department of City Planning
Los Angeles, California 90012

**Re: Justifications for Appeal of 8150 Sunset Boulevard Project; Case No.
CPC-2013-2551-MCUP-DB-SPR**

To Whom It May Concern:

I am in receipt of the Determination Letter dated August 17, 2016 for the Sunset Boulevard Mixed-Use Project located at 8150 Sunset Boulevard ("Project"). The Laurel Canyon Association ("LCA") hereby appeals the Master Conditional Use, Site Plan Review, Density Bonus and related Environmental Impact Report ("EIR") for the 8150 Sunset Boulevard Project ("Project").

About Laurel Canyon Association

Initially, I would like to provide some background. LCA is a neighborhood association serving the area of the Hollywood Hills known as "Laurel Canyon," one the most beautiful and environmentally important areas of Los Angeles. The hills in Laurel Canyon provide a scenic backdrop for the rest of Los Angeles. Further Laurel Canyon's forested valleys and chaparral-draped hillsides offer habit for native wildlife. Laurel Canyon also is home to a watershed and greenbelt for the vastly developed plains of Los Angeles and the San Fernando Valley.

LCA was founded for the express purpose of preserving and improving the quality of life in Laurel Canyon. The goal of our community group is to promote the welfare of the residents of Laurel Canyon and to maintain the quality of life in the Hollywood Hills, by preserving its residential character, its quiet, privacy, natural beauty and safety. Moreover, LCA endeavors to encourage cooperation among all residents and to educate appropriate governmental bodies concerning changes in existing or proposed laws affecting Laurel Canyon or in anything that affects the local community.

Tel: 310-982-1760
Email: jhall@laurelcanyon.org

LCA's jurisdiction includes Laurel Canyon Boulevard, its feeder streets and the Kirkwood, Stanley Hills, Lookout Mountain and Wonderland bowl areas. The neighborhood is bounded on the north by Mulholland Drive and at the south by Hollywood Boulevard. The main streets are Laurel Canyon Boulevard, Mulholland Drive, Wonderland Avenue, Lookout Mountain Avenue, Kirkwood, and Stanley Hills. LCA is a residential stakeholder with membership in the Los Angeles Neighborhood Council system, specifically, the Bel-Air Beverly Crest Neighborhood Council ("BABCNC").

Justifications/Reasons for Appeal

For decades, residents of LCA have patronized stores located at 8150 Sunset Boulevard. Moreover, each day thousands of residents pass by the property on their way to work, visit friends and shop and school.

LCA appealed the issuance of the Vesting Tentative Tract ("VTT") Map and related Environmental Impact Report ("EIR") for the Project on August 29, 2016. LCA is appealing the Master Conditional Use, Site Plan Review and Density Bonus issued for the Project for similar reasons. The City has wrongly concluded that the Project will not adversely affect the welfare of the pertinent community (mandatory Conditional Use finding). Further, the City mistakenly found that the Density Bonus would not have an adverse impact upon the health, safety and physical environment (required Density Bonus Finding). Finally, the City erred when it determined that the Project was in conformance with the purpose and intent of the General Plan and Community Plan (applicable Site Plan Review finding). Extensive testimony and documentation was provided to the City Planning Commission evidencing the adverse impacts and non-conformance issues that form the basis of this appeal.

It should be noted that the flow of traffic at the intersection of Sunset Boulevard and Crescent Heights/Laurel Canyon Boulevard is of paramount concern to LCA and one of the primary reasons that LCA has filed both appeals. It defies logic to believe that a building of this size and density could possibly not create additional traffic (and air pollution) along Laurel Canyon Boulevard. The intersection of Crescent Heights and Sunset is severely congested and the impacts associated with the Project are unknown without an adequate traffic study.

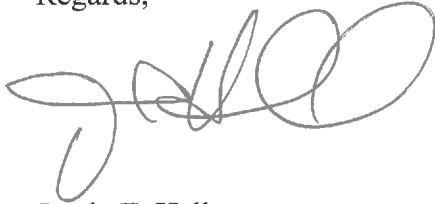
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Finally, please be advised that LCA plans on filing a more robust appeal justification letter and reserves the right to supplement this appeal. Please don't hesitate to contact me if you have any questions or comments. I may be reached at 310-982-1760 or jhall@laurelcanyon.org.

Regards,

A handwritten signature in black ink, appearing to read 'J. Hall', with a large, stylized flourish at the end.

Jamie T. Hall
Laurel Canyon Association
President