



**City of South Pasadena  
Planning and Community  
Development Department**

# Memo

**Date:** June 9, 2020

**To:** Chair and Members of the Planning Commission

**From:** Joanna Hankamer, Planning and Community Development Director  
Kanika Kith, Planning Manager

**Prepared By:** Malinda Lim, Associate Planner

**Re:** June 9, 2020 Planning Commission Meeting Item No. 1 – Additional Public  
Comments for Moffat Street Extension Received After Deadline (Project No.  
2191-HDP/TRP)

---

The deadline for the public to submit comments for the Planning Commission to consider at tonight's meeting was 6:00 PM on Monday, June 8, 2020. This deadline was extended to 4:30 PM tonight for those who emailed [PlanningComments@southpasadenaca.gov](mailto:PlanningComments@southpasadenaca.gov) wishing to leave a voicemail. After the original deadline to submit comments passed, staff received three emailed comments today. These new comments are attached.

## Malinda Lim

---

**From:** Kanika Kith  
**Sent:** Tuesday, June 9, 2020 10:03 AM  
**To:** Malinda Lim  
**Cc:** Joanna Hankamer  
**Subject:** FW: Opposed to Monday street extension

Kanika Kith | Planning Manager  
CITY OF SOUTH PASADENA | Planning & Building Dept.  
1414 Mission Street | South Pasadena, CA 91030 [kkith@southpasadenaca.gov](mailto:kkith@southpasadenaca.gov) | T: 626.403.7227

COVID-19 PLANNING AND COMMUNITY DEVELOPMENT UPDATES • For general Planning-related information and questions, please email [AskPlanning@southpasadenaca.gov](mailto:AskPlanning@southpasadenaca.gov) or call (626) 403-7220.

- For Planning project-related information or questions, please continue to contact the project planner directly via email.
- For Building-related information and questions, please email [PermitTech@southpasadenaca.gov](mailto:PermitTech@southpasadenaca.gov) or call (626) 403-7224.
- For Code Enforcement filing, please complete the form on our website and email the completed form to [CodeEnforcement@southpasadenaca.gov](mailto:CodeEnforcement@southpasadenaca.gov).
- We appreciate your business and your patience during this time.

-----Original Message-----

From: Kathy Hoang <[hoangkat@gmail.com](mailto:hoangkat@gmail.com)>  
Sent: Monday, June 8, 2020 11:31 PM  
To: PlanningComments <[PlanningComments@southpasadenaca.gov](mailto:PlanningComments@southpasadenaca.gov)>  
Subject: Opposed to Monday street extension

CAUTION: This email originated from outside of the City of South Pasadena. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear planning commission,

I am writing to express my opposition to the Moffat St extension (2191-HDP/TRP). I live 5 houses from the LA-South Pasadena border on the LA side, and am concerned about the negative environmental impacts of this project. There is very little natural habitat left in our urban area and it's critical that we preserve what is left. There are several trees including the endangered Southern California Walnut tree that would be destroyed by this project. I hope you will consider the resounding opposition you are hearing from the community and halt this project.

Thank you,  
Kathy Hoang  
323-524-8435

## Malinda Lim

---

**From:** Tom Williams <ctwilliams2012@yahoo.com>  
**Sent:** Tuesday, June 9, 2020 1:42 PM  
**To:** PlanningComments; Malinda Lim  
**Subject:** Fw: Public Comments for Planning Commission Agenda Item 1 060920

**CAUTION:** This email originated from outside of the City of South Pasadena. Do not click links or open attachments unless you recognize the sender and know the content is safe.

DATE: 060920  
TO: City of South Pasadena Planning Commission  
CC: Malinda Lim

FROM: Dr. Tom Williams, Snr. Techn. Adviser, Citizens Coalition for A Safe Community

SUBJECT: Agenda Item #1 Planning Commission Meeting June *09*, 2020 6pm Moffat Extension [*sorry for date error 08 > 09*]

RE: Public Comments #2 pg.3 only

Thank You for the opportunity to review this project as it relates to the North boundary of the North District of LA-32 Neighborhood Council area, for which I am an elected Director to LA-32 NC. I oppose this project as currently defined and will appeal and undertake further actions if approved as currently presented.

### General Comments:

The City of South Pasadena (CSP) has not approved lead agency designation for consideration of a project which includes substantial earthworks and construction within and by the City of Los Angeles (CLA).

The proposed Extension is only one part of a larger area development and, thereby approval of one, may lead to the “approval” of all, later; this is piecemealing.

The Project if implemented would lead to substantial growth inducements for large northside/hillside lots within and adjacent to the Extension as has already occurred in similar areas of CSP, along Alpha, Cam Lindo, and even 2051 La Fremontia.

Although more than 10 adjacent parcels could be served by the Extension, not all adjacent lots will be provided access to the Extension and leaving some lots as “Land-Locked”. The Extension starts as a “public street” and then become a “private driveway” without service to all adjacent lots.

Based on these and other comments please continue this Project consideration and require a more thorough presentation, along with a letter assigning Lead Agency Status to the City of South Pasadena for all elements within the CLA and CSP.

No attachment #2

pg. 3 / parag.2 There is no LACity Building Department, Dept. of Building and Safety [as mentioned in parag.3]  
parag. 3 There is no "Planning Department" it is Department of City Planning.

Define "Zoning Clearance" by the LAC-DCP.

parag. 4-5 LAFCo involvements.

Provide current status of Extension site and relationship/easement contracts between current property holders in CSP and the Applicant. Have the parcels in CSP been subdivided or new easements designated?

This document needs a professional editing start to finish.

Dr. Tom Williams

Approval Process in City of Los Angeles for the Homes The seven (7) homes proposed for development in the City of Los Angeles for which the private street will serve are subject to the City of Los Angeles' Northeast Hillside Ordinance ("NEHO"). The homes are by-right and do not require discretionary review if the homes follow the standards set forth in the NEHO. The developer has provided a letter of intent (see Attachment 7) to follow all standards set forth in the stated ordinance in order to not require discretionary review. The plans of the seven (7) homes are currently undergoing plan review with the Los Angeles Building Department. The street design, classification and approval of the private street is required in order for the City of Los Angeles Building Department to determine each lot's required frontage setbacks and height requirements. Due to a designed width of the street (see Attachment 5) of only 20-feet, the street would be considered a "substandard hillside limited street" by the City of Los Angeles. After the City of Los Angeles Building & Safety Department has reviewed and approved the house plans, the applications will proceed to the Los Angeles City Planning Development Service Center Metro location for the Planning Department's zoning clearance prior to the issuance of any grading or building permits

DATE: 060920  
TO: City of South Pasadena Planning Commission  
FROM: Dr. Tom Williams, Snr. Techn. Adviser, Citizens Coalition for A Safe Community  
SUBJECT: Agenda Item #1 Planning Commission Meeting June 08, 2020 6pm Moffat Extension  
RE: Public Comments

Thank You for the opportunity to review this project as it relates to the North boundary of the North District of LA-32 Neighborhood Council area, for which I am an elected Director to LA-32 NC. I oppose this project as currently defined and will appeal and undertake further actions if approved as currently presented.

General Comments:

The City of South Pasadena (CSP) has not approved lead agency designation for consideration of a project which includes substantial earthworks and construction within and by the City of Los Angeles (CLA). The proposed Extension is only one part of a larger area development and, thereby approval of one, may lead to the "approval" of all, later; this is piecemealing. The Project if implemented would lead to substantial growth inducements for large northside/hillside lots within and adjacent to the Extension as has already occurred in similar areas of CSP, along Alpha, Cam Lindo, and even 2051 La Fremontia. Although more than 10 adjacent parcels could be served by the Extension, not all adjacent lots will be provided access to the Extension and leaving some lots as "Land-Locked". The Extension starts as a "public street" and then become a "private driveway" without service to all adjacent lots. Based on these and other comments please continue this Project consideration and require a more thorough presentation, along with a letter assigning Lead Agency Status to the City of South Pasadena for all elements within the CLA and CSP.

More Specific Comments:

2/1 Project Analysis

Street Design

The City has purview over the design and construction of the **private street**.

The proposed 30-foot wide **private street** has been revised since the March 10th Planning Commission meeting to include the following additions:

- A set of stairs with guard rails This occurs in the area where Moffat Street becomes a private street and will make it easier for pedestrians going up and down the **street** in a location that is **too steep** for a ramp.
- Street lights** Three (3) **street lights** will be installed along the **sidewalk** to provide for better visibility and safety. ***As the CSP designates the Extension as a street and include the initial portion within the public ROW, does the entire project require compliance with the "American Disability Act", including the stairway and sidewalks for the entire project. Provide a wheelchair accessible ramp for the stairway and assure all sidewalks are 42in or wider.***

2/5 The City of Los Angeles would not issue building permits to the landlocked properties without an **improved street**. The **street vacation and Right-of-Way Easement** granted by the City of South Pasadena in 1961 executes ingress and egress rights to the landlocked properties.

***Earlier versions and consideration of the land-locked parcels in the CLA provided a service easement and opportunities for access through Lowell and the CLA which have not been used. The Extension will add more development in the CLA by allowing at least one lot on Lowell to be developed.***

6/2 Public Notification of Agenda Item The **public** was made aware that this item was to be considered this evening by virtue of its inclusion on the legally publicly noticed agenda, posting of the same agenda and reports on the City's website, in the South Pasadena Review newspaper, and individual property mailings to those within 300 feet of the project site.

9/ WHEREAS, on May 28, 2020, the public hearing notice indicating the date, time, and location of the public hearing was published **outside City Hall** and said public hearing notice was mailed to each property owner within a **300-foot radius of the project site** in accordance with the requirements of South Pasadena....

WHEREAS, on May 29, 2020, the City of South Pasadena Planning Division, published a legal notice in the South Pasadena Review, a **local newspaper** of general circulation, indicating the date, time, and...

WHEREAS, the South Pasadena Planning Commission held a duly noticed public hearing on June 9, 2020, at which time it considered the staff report, oral report, the testimony, and the written evidence submitted by and on behalf of the applicant and by members of the public...and approved the proposed Hillside Development Permit and Tree Removal Permit for the extension of Moffat Street which will be a **private street**.

**As an undesignated Lead Agency, the CSP has used only CSP requirements of 300ft radius notice area, rather than the CLA's 500ft notices. Publicly distributed notices were only circulated through CSP media, and no records of notices for the affected communities of CLA and the LA-32 Neighborhood Council.**

**Provide notices of all future CSP meetings affecting CLA properties and negotiate a Lead Agency agreement with CLA.**

10 SECTION 1: The Planning Commission has determined that the proposed project is Categorically Exempt from the provisions of the California Environmental Quality Act (CEQA), under Article 19 Section 15303, Class 3 – New Construction or Conversion of Small Structures of the California Guidelines for Implementation of CEQA. Class 3 exemption includes water main, sewage, electrical, gas, and other utility extensions, including **street improvements**, of **reasonable length** to serve such construction. Specifically, the project involves **street improvements** of an access easement to landlocked properties in Los Angeles.

**The CSP and the Planning Commission has no jurisdiction to approve projects within the City of Los Angeles, nor the Neighborhood Council area of LA-32.**

**Provide the Initial Study for the Project and CEQA considerations to arrive at the Categorical Exemption which is required to submit to the County and State SCH/OPR.**

**Provide clear and consistent usage of street and driveway throughout all documents.**

**Provide an agreement with the CLA to assign CSP as Lead Agency for this Extension and all later construction related thereto.**

11/ 4. The impact on surrounding properties The **proposed private street** will have a **positive impact on the surrounding properties [both cities]**. The proposed project would provide a paved access road to the **seven landlocked properties within the City of Los Angeles**, 4519 Lowell Avenue, and 2051 La Fremontia Street. The proposed project will create an easier access for the **nine properties** it serves for emergency services to reach the properties.

**More than 9 properties will have access adjacent to the Extension, but as a private project, the Extension can/has limited access of some properties although the properties are immediately adjacent.**

**Provide all properties (within 10ft of the Project boundaries) with access to this public/private street.**

**The "Positive Impact" is commonly called growth inducement, the proposed Extension will cause growth inducements for "small-lot-subdivisions", "Accessory Dwelling Units", and large R-1 parcel subdivisions as has and is occurring within CLA and CSP.**

**Provide conditional limits on all adjacent parcels to prohibit accessory dwelling units (bungalows), small lot subdivisions, and large lot subdivisions.**

11/ 5. The obstruction of sunlight to the existing adjoining residences. The proposed retaining walls help to retain the existing hillside and will be a lower elevation....The **existing homes** on Atlas Street within the City of Los Angeles are **at the top [bottoms] of the slope [Parcels drop 30-40ft]**; the **proposed development** of the single-family homes on the vacant lots **would be the cause of sunlight obstruction**.

**The submittals have numerous errors and clearly shows the incomplete and inadequate knowledge and considerations of the Extension and its setting by the applicant.**

**No "proposed development" has been submitted for all of the "land-locked" home parcels and no sunlight obstruction would exist as they are all southerly sloped parcels.**

**Withdraw the entire submittal, review and revise with CSP and CLA residents and organizations, get Lead Agency designation, and recirculate all considerations along with publicly accessible documents and records.**

12/ The **establishment, maintenance, or operation of the use** would not,..., be detrimental to the health, safety, or general welfare of the persons residing or working in the neighborhood of the proposed use;

The proposed project would provide a **paved access road** to the **seven** landlocked properties..., **4519 Lowell Avenue**, and 2051 La Fremontia Street. The proposed project will create an **easier access for the nine properties**...for emergency services to reach the properties. The project is conditioned to **install stop signs, stop pavement legends, and limit lines for the north and south approaches on Maycrest Avenue** to improve traffic safety.

***As a private project, provide the Homeowners Maintenance Association which will accept, conduct, and provide bonding for the Project and all related facilities thereto.***

***Provide specific drawings/locations for such signages, marking, and lines and for Overhead Lighting for the Extension, Moffat, Maycrest, and Lowell.***

13/ 5. The design, location, operating characteristics, and size of the proposed use would be compatible with the existing and **future land uses** in the vicinity, in terms of aesthetics, character, scale, and view protection. The proposed project would provide a **paved access road** to the **seven** landlocked properties within the City of Los Angeles, 4519 Lowell Avenue, and 2051 La Fremontia Street.

An abundance of landscaping is proposed to help screen **the wall**.

A condition was added for the properties utilizing the private street to maintain the street to be aesthetically appealing.

***No viewshed analyses for CLA residents and travellers have been provided.***

***Landscaping would be provided to One Wall.***

***4519 and 2051 are not currently landlocked and have driveway access to La Fremontia and Lowell, although the two 2051 units on this property would benefit from having a second, shorter driveway, which is assumed to be part of their easement negotiated with the applicant.***

13/ SECTION 6. DETERMINATION Based upon the findings outlined...and provided during the public hearing, the Planning Commission of the City of South Pasadena hereby approves the application for a Hillside Development Permit for the **extension of Moffat Street**, which will be a **private street** extending westward from the terminus of the existing Moffat Street to allow access to **seven lots in Los Angeles** and a Tree Removal Permit for the removal of five tree...

***As shown, the eastern 180ft portion of the Project is part of the CSP's ROW and thereby part of the Public Street which would serve the driveway and parking of the apartment building at SE corner of Lowell/Moffat ROWs and streets.***

***Do not approve this Project/Application based on the currently inadequate and incomplete documents under consideration. If so approved, appeals and further actions will be undertaken. Continue the considerations and request further revised documents and additional public considerations.***

16/ P-9. The hours of construction shall be limited to 8:00 am through 7:00 pm Monday through Friday; **9:00 am through 7:00 pm on Saturday; and 10:00 am through 6:00 pm on Sunday.**

***Provide the construction work hours and special permit hours as used by CLA Dept. Building and Safety. Prohibit Sunday construction hours totally.***

17/ P-12. The developer shall **provide a letter from the City of Los Angeles** confirming that the applicant has sufficiently addressed all other outstanding plan check comments and that the City of Los Angeles is ready to issue grading or building permits subject to the City of South Pasadena issuing grading permits for the **road extension**, for the combinations of properties referenced above (Condition P-11).

***Provide consistent use of driveway, road, and public street as these have different definitions and standard usage by CSP and CLA.***

***Provide letter of agreement from CLA that the CSP is lead agency for all landlocked parcels along the CSP boundary.***

17/ P-14 Street improvement plans for the **private street** shall show the sidewalk, curb, and **gutter** connecting with the existing sidewalk, curb, and **gutter** located in front of the apartment building at 4520 Lowell Avenue.

***Initial 180ft of Extension is within the CSP ROW and thereby Public Street.***

***Provide consistent use of driveway, road, and street as these have different definitions and standard usage by CSP and CLA.***

***Provide letter of agreement from CLA that the CSP is lead agency for all landlocked parcels along the CSP boundary.***

**Provide Low Impact Development improvements and agreement of CLA to accept huge amount of street/driveway/building storm runoff. Provide conditions on Extension and all sites adjacent to and served by the Extension to collect/detain and reuse onsite of any rainfall of >3/4 inch/24 hours.**

- 17/ P-16 The applicant shall submit a construction management plan for approval by the Building, Planning, and Public Works Departments. The construction management plan shall include, but not be limited to:
- a. A **proposed haul route** and location of a **proposed off-site construction staging area** where project construction workers and/or subcontractors will park and equipment will be stored. Equipment and construction staging area shall be located away from adjacent residential uses. Any construction activity that may require closing public roadways shall be identified and mitigation identified as part of the staging plan. The applicant shall obtain input from Public Works to identify haul route and staging area.

**Provide the same to all CLA departments related thereto, as portions of the Extension impact on the CLA.**

**Based on review of available documents no haul route(s) or quantitative grading volumes have been provided for the project construction. Provide a quantitative and numerical review, including bulking factors (e.g., 25-50% bulking for exported and similar for imported – with onsite compaction), for monthly grading, imported, and removed soil/dirt and concrete/aggregate materials for the site. Based on 10 cuyd loaded volumes provide daily/weekly truck traffic along haul route(s).**

**Prohibit weekend hauling of bulk materials. Require approval of CLA Board of Building and Safety Commissioners consideration and approval for project.**

**Based on review of available documents no staging area or parking for the project construction is indicated anywhere and based on available information, no feasible construction staging, parking, and stockpiling areas are available other than the streets of CLA and CSP.**

**Provide specific Staging, Parking, and Stockpiling areas for the project.**

- 21/ PW-10. **Water and sewer utilities** shall be provided by the City of Los Angeles. Show the location and area of trench sections for the proposed sewer and water lines connection within the private street including trench restoration detail and all utility points of connections (POC). The City of South Pasadena will not provide water and sewer utilities.

**No reference is made to Storm Drainage and LID, nor where surface drainage of the Extension will reach a storm water inlet and who will be responsible for capacity and maintenance of such drainage facilities. Who will clean the gutters, inlet screens, and drains.**

- PW-12. Provide clearance letter from **utility companies** for any proposed relocation of utility lines that encroach on the **properties** prior to obtaining permits for the project.

**Provide clearance letter from CLA Dept. of Water and Power for power and sanitation and for water and sewerage.**

- PW-13. Improvement plans for underground utilities (i.e. water, sewer, gas, electrical, telecommunications, etc.) to be placed in the **private street or easement** that will be owned and maintained by other entities shall be reviewed by the City prior to Utility Agency approval.

**Provide definition of “etc.” and assure inclusion of fire hydrants, street lighting, and storm drainage receiving storm water directly/indirectly within 500ft of project boundaries,**

- PW-14. The Developer shall execute and provide to the City, a written statement from the water, sewer, electrical, and gas purveyor indicating that each system will be owned, operated, and maintained by the purveyor and that under normal condition, the system(s) will meet the requirements for the **development and that each service will be provided to each building.**

**Provide table of maximum planned capacities for all utilities and services within the project and all properties adjacent to the Extension development boundaries.**

- 29/ Project Description The applicant, Planet Home Living (Developer), is requesting approval of a Hillside Development Permit for the **street design of the private street portion** that extends from Moffat Street **westward approximately 580 feet...** The term, “**private street**” will refer to the portion of the **street extension** and the **proposed project.**

**The Project includes retaining walls, driveways, and “street-related facilities” and includes CSP ROWs and privately acquired easements.**



**Provide copies of all easement agreements and use agreement/franchises for the CSP ROW.  
Revise and provide consistent usage of street and driveways.**

30/ The **portion of Moffat Street** directly west of Lowell Avenue **will be a private street** to access the seven lots in Los Angeles. In addition, the Developer will also **provide driveway access** to 2051 La Fremontia Street (City of South Pasadena) on the northern portion of the private street and to 4519 Lowell Avenue (City of Los Angeles) on the southeast portion the private street.

Currently, the owners of 4519 Lowell Avenue use Lowell Avenue to arrive to their property and encroach onto the access easement to reach their garage without **proper authority**. The Developers will provide an appropriate driveway approach for 4519 Lowell Avenue but with the development of the private street, Lowell Avenue will be closed off and the owners of 4519 Lowell Avenue will need to access their garage from Moffat Street.

**Define private street vs private driveway and use consistently throughout.**

**Private driveways, including curb cuts and ramps and the double-driveway at the west end**

**Define "Proper Authority" and historic use of this driveway for 4519 Lowell, use historic aerial photos.**

Geology p.182 – Preliminary Geologic and Geotechnical Report

p.184 Letter 10/14/17 Geoconcepts Inc. **No signatures on stamps**

p. 185-187 maps **No stamps and use Tp, rather than Tt.**

p. 204 Stratigraphy and p.314 refer the geology to the Puente Formation (Tpss and Tpsh), **the map shows the site formation as Tertiary Topanga (Ttsl) north of Newtonia St., 800ft south of the site.**

p.227 022719 Geologic Map (text p.30). **No specific Reference citation for USGS Map. No legend of geologic units, Tp and Tt.**

**Entire report is in error and requires withdrawal and revision before further considerations.**

Examples of So Pasadena Lot Splits and Accessory Dwelling Units – yellow line with red dots



580ft Project Site Moffat Extension along Yellow line – supposedly 780ft.

