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If you have any questions, please contact the Commission Office at (213) 978-1300.

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December 10, 2024

VIA EMAIL

Honorable Central Area Planning Commission
200 North Spring Street, Room 1010
Los Angeles, CA 90012
Email: undine.petrulis@lacity.org

Re: 846 S. Union Avenue (Case No. DIR-2024-4224-BSA-1A)

Dear Honorable Area Planning Commissioners:

We represent Catholic Charities of Los Angeles, the social service arm of the Archdiocese of Los Angeles, which serves thousands of local under-resourced individuals and families. Catholic Charities owns the 846 S. Union Avenue property. The Los Angeles Conservancy appeal of the Department of Building and Safety's issuance of the demolition permit for 846 S. Union Avenue (the "Demolition Permit") is without merit and must be denied.

The Director of Planning correctly found that the Department of Building and Safety "DID NOT ERR or abuse their discretion in its determination to issue Permit No 20019-1000-00474 for the demolition of a three-story office building." Further, this Commission is without jurisdiction to hear the appeal because the City Council has already decided the issues it raises. In all events, the building is demolished. The appeal is moot.

The Area Planning has no jurisdiction over the appeal of the Department of Building and Safety's issuance of the Demolition Permit. The Department of Building and Safety issued the Demolition Permit following the City Council's express determination that, in the City's sole and independent judgment, review pursuant to CEQA was not required prior to or for the issuance of the Demolition Permit and the issuance of the Demolition Permit is a ministerial action under CEQA. The City's decision and action was approved unanimously by the City Council on March 8, 2024, and is final. This appeal must be dismissed.

Further, in connection with the City's March 8 determination regarding CEQA, the City Council approved a motion that (i) directed the Department of Building and safety to "begin its normal ministerial process of the Demolition Permit," and (ii) "require[d] the Department of City Planning to issue any clearances preventing issuance of the Demolition Permit." Pursuant to the City Council's final direction, the Planning Department issued its clearance on April 2, 2024. The Planning Department was required to issue its clearance because the City Council found that

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review pursuant to CEQA was not required prior to or for issuance of the ministerial demolition permit.

The City Council is the final decision-making body for the City under CEQA. (See Pub. Resources Code, § 21151(c).) The City Council action is final and beyond challenge.

Appellant's appeal rehashes the arguments that the City Council, and then the Director of Planning, rejected in finding the Demolition Permit's issuance was ministerial. Specifically, the Director of Planning's decision confirms that "LADBS received confirmation to issue the demolition permit" based on the expertise of other City Departments. (Director Decision, at p. 16.) During the hearing before the Director LADBS confirmed that it "always defers to other departments for their expertise and authority" and that it "would not override the authority of other departments..." As the City Council and the Planning Department had already determined that the permit was ministerial and should issue, the Director properly rejected appellant's arguments.

Appellant's appeal justification based on the City Redevelopment Ordinance fails for essentially the same reasons. The City Council, the City's ultimate decision-making entity has decided the issue. Moreover, because the now-demolished building is owned by a religiously affiliated non-profit organization – Catholic Charities of Los Angeles– the City could not designate the property a historic cultural monument. The Planning Department conceded this in June 2022, and stopped processing the application to designate the building as a historic-cultural monument.

Lastly, the appeal is moot. The building has been demolished pursuant to the Department of Building and Safety's validly issued Demolition Permit.

For these and the reasons detailed in our prior correspondence to the City (and incorporated herein), the Director's October 8, 2024, Decision, is correct on all grounds. The Central Area Planning Commission has no authority to grant the appeal. If not dismissed, the appeal must be denied.

Thank you for your attention to this matter.

Very truly yours,

/s/ Benjamin Hanelin

Benjamin J. Hanelin

of LATHAM & WATKINS LLP

cc: Monsignor Cox, Catholic Charities of Los Angeles
Lucy Atwood, Esq., Office of the City Attorney



B'nei B'rith Lodge Demolition

1 message

jeaco@aol.com <jeaco@aol.com>

Mon, Dec 9, 2024 at 7:51 PM

To: "apccentral@lacity.org" <apccentral@lacity.org>

To Whom It May Concern:

As a member of the LA Conservancy and a Los Angeles resident, I am appalled with the way the B'nei B'rith Lodge was demolished with no accountability to the public. The City disregarded its own rules for conducting an Environmental Impact report and there appears to be little transparency in how the decision came about. It was done behind closed doors.

I fully support a full review of the matter and appeal to the LA Planning Commission. While we cannot bring back this wonderful 1923 building, we can remain vigilant and make sure this NEVER happens again.

Sincerely,

Judith Alban



Planning APC Central <apccentral@lacity.org>

B'nai Brith Lodge

1 message

Laurie <pkelsondds@aol.com>
To: apccentral@lacity.org

Mon, Dec 9, 2024 at 11:00 PM

An EIR must be done prior to the demolition of a historic building. Please follow the rules.
Laurie Kelson
Encino

[Sent from the all new AOL app for iOS](#)



B'nai B'rith Lodge

1 message

Russell Kehl <rkehl@structuralfocus.com>
To: apccentral@lacity.org

Mon, Dec 9, 2024 at 5:02 PM

I support the Los Angeles Conservancy's appeal for the City of Los Angeles to intervene in the demolition of the historic B'nai B'rith Lodge. Historic buildings must be saved so future generations can learn about the significant events, cultural history, and amazing design of many of these buildings. Please do not let this historically significant and beautiful building be lost forever. I urge you to halt this atrocity.

Thank you.

Russell Kehl, S.E.
Principal, President

Structural Focus
[19210 S. Vermont Ave., Bldg. B, Suite 210](#)
Gardena, CA 90248

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