

GENERAL INFORMATION ABOUT THE CONTENTS OF THIS FILE

Submissions by the public in compliance with the Commission Rules and Operating Procedures (ROPs), Rule 4.3, are distributed to the Commission and uploaded online. Please note that “compliance” means that the submission complies with deadline, delivery method (hard copy and/or electronic) AND the number of copies. Please review the Commission ROPs to ensure that you meet the submission requirements. The ROPs can be accessed at <http://planning.lacity.org>, by selecting “Commissions & Hearings” and selecting the specific Commission.

All compliant submissions may be accessed as follows:

- **“Initial Submissions”**: Compliant submissions received no later than by end of day Monday of the week prior to the meeting, which are not integrated by reference or exhibit in the Staff Report, will be appended at the end of the Staff Report. The Staff Report is linked to the case number on the specific meeting agenda.
- **“Secondary Submissions”**: Submissions received after the Initial Submission deadline up to 48-hours prior to the Commission meeting are contained in this file and bookmarked by the case number.
- **“Day of Hearing Submissions”**: Submissions after the Secondary Submission deadline up to and including the day of the Commission meeting will be uploaded to this file within two business days after the Commission meeting.

Material which does not comply with the submission rules is not distributed to the Commission.

ENABLE BOOKMARS ONLINE:

**If you are using Explorer, you need will need to enable the Acrobat  toolbar to see the bookmarks on the left side of the screen.

If you are using Chrome, the bookmarks are on the upper right-side of the screen. If you do not want to use the bookmarks, simply scroll through the file.

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

SECONDARY SUBMISSIONS



January 17th, 2025

President Lawshe and Commissioners
Los Angeles City Planning Commission
200 N Spring St.
Los Angeles, CA 90012

SUBJECT: 8931-8945 Helms Pl. Letter from South of Robertson Neighborhood Council

Dear President Lawshe and Honorable Commissioners,

I am writing on behalf of my client, Sandy Albert, the applicant for Item 7 (Case Number: CPC-2024-3020-DB-VHCA) on your January 23rd, 2025, agenda. The purpose of this correspondence is to bring to your attention concerns about possible legal, process and code of conduct violations, along with a failure to properly communicate with the public, by the South of Robertson Neighborhood Council (SORO).

As explained in more detail below, despite a recommendation of project support from the SORO Land Use Committee on July 2, 2024 for my client's proposed project, SORO failed to agendize a full board meeting hearing on the project, despite our multiple requests to do so. **Then, SORO surreptitiously and without proper public notice, or notice to the applicant, held a series of "Special" Executive Committee and Board meetings last week, while fires were ravaging our City, and issued a letter of opposition to my client's project and submitted it to the project file.**

As referenced above, on July 2nd, 2024, SORO's Land Use Committee held a noticed meeting that included consideration of our client's proposed 78 unit project (inclusive of 11 VLI and 1 ELI unit) at 8931-8945 Helms Place. During that meeting, the **Land Use Committee voted unanimously for a recommendation of support** for the project to the Neighborhood Council's General Board. My firm reached out multiple times to the Land Use Committee Chair, Mitch Cohen, in the weeks after the meeting to request when would have the opportunity to present our project to the General Board and never received a response.

We notified the Office of Councilmember Heather Hutt on July 3rd, 2024, of the Land Use Committee's recommendation of support and met with the Council Office on August 27th, 2024, to provide them an update on the project and discuss our meeting with the Land Use Committee. The agenda for the July 2nd Land Use Committee meeting has since been deleted from the South of Robertson Neighborhood Council's website and their online calendar now claims the Committee meeting never occurred, which is inaccurate. My firm's July 3rd, 2024, email to the Council Office, along with the agenda for the July 2nd meeting, is attached to this correspondence.

It is with that background information that we were profoundly disappointed to discover a letter of opposition from the South of Robertson Neighborhood Council to my client's project after a series of meetings of which we were never notified.

On Sunday, January 5th, 2025, the Executive Committee of the Neighborhood Council held a special meeting to review and approve an agenda for a special General Board meeting on Wednesday, January 8th.

On Monday, January 6th, 2025, the Executive Committee met again to finalize the agenda for the special board meeting to consider a possible action on our client's project. Neither my firm nor the project representative from Irvine & Associates was notified or invited to this meeting that we would surely have attended.

On Tuesday, January 7th, 2025, the Land Use Committee convened a meeting where my client's project was inaccurately listed under "Unfinished Business" even though the Committee made a recommendation of support on July 2nd, 2024. Again, neither my firm nor the project representative from Irvine & Associates was notified or invited to this meeting that we would surely have attended.

On Wednesday, January 8th, 2025, the special General Board meeting was held, and a decision was made to issue a letter of opposition to my client's project without any input from the project's representatives.

Sadly, this series of special meetings were held during a local state of emergency, while portions of the City were ablaze and tens of thousands of Los Angelenos were fleeing from the wild fires. The City itself acknowledged the inappropriateness of holding public meetings or hearings last week by canceling all Planning-related public hearings and City Council meetings. Both individually and collectively, these meetings and decisions by SORO do not appear to comply with the Brown Act, SORO's bylaws or the City of Los Angeles' rules and regulations as they relate to neighborhood council meetings and actions.

While opposing a project is well within the right of any neighborhood council, **we are very disappointed that the South of Robertson Neighborhood Council would take advantage of a historic and catastrophic natural disaster to surreptitiously oppose our client's project** without notifying the applicant or their representatives, and after receiving a recommendation of support from their Land Use Committee. We have met multiple times with the community and members of the neighborhood council and would have been desirous to participate in any SORO discussions about the project had we been notified.

If you have any questions for my office as it relates to this matter, I can be reached at Aaron@Afriat.com and would be happy to answer your questions.

Very Respectfully,

A handwritten signature in blue ink, appearing to read 'Aaron Green', with a stylized flourish extending to the right.

Aaron Green
PRESIDENT

CC: Office of Councilmember Heather Hutt

Aaron Green

From: Brandon Zavala <brandon@afriat.com>
Sent: Wednesday, July 3, 2024 12:53 PM
To: 'Terrence Gomes'; hakeem.parke-davis@lacity.org
Cc: 'Jonathan Yang'; 'Aaron Green'
Subject: 8931-8945 Helms Pl // SORO NC Land Use Committee Update

Good Afternoon Terrence and Hakeem,

I hope this email finds both of you well before the long Fourth of July weekend.

Last night our team presented the 8931-8945 Helms Place project before the South Robertson Neighborhoods Council's Land Use Committee and received a recommendation of support with the condition that the City create a preferred parking district in the neighborhood. As we understand it from the Chair, Mitch Cohen, the Board will likely consider the recommendation during their August meeting.

We heard feedback as it related to the height of the proposed building, potential construction impacts, parking, unit configuration, and project/construction timelines. We will be taking this feedback back to our client for discussion.

Lastly, we resubmitted to Planning earlier this week. We are still waiting for the Affordable Housing Referral Form, which upon receipt we will provide to Planning. Let us know if you have any questions.

Have a fun and safe weekend!

Thank you,

Brandon Zavala
Senior Government Affairs Director
The Afriat Consulting Group, Inc.
4107 Magnolia Boulevard
Burbank, CA 91505
818.450.2777 desk
818.318.5840 mobile
Brandon@Afriat.com





Land Use Committee Meeting Agenda

Tuesday, July 2, 2024, 7:00pm

Meetings end at 9:00pm unless the Committee votes to end earlier or extend the time.

Location: Howard and Irene Levine Senior Community, 8862 W. Pico Blvd, LA 90035 - 3rd Floor Community Room

The amount of time for public comment on each agenda item is to be determined by the Chair at each meeting. Speakers shall limit their comments to matters relevant to the item on the agenda. The Chair may rule that the speaker is out of order if the comments are not germane to the item under consideration. If multiple requests for public comment are submitted on one agenda item, preference will be granted to members of the public who have not spoken previously during the meeting, either during general public comment or on another agenda item. Comments from the public on other matters not appearing on the agenda that are within the Committee's jurisdiction will be heard during the General Public Comment period. General Public Comment is limited to 15 minutes maximum. No individual speaker will be allowed more than two (2) minutes during General Public Comment, unless the presiding officer decides differently.

- 1. Call to Order**
- 2. Roll Call- Current Committee Members:** Mitch Cohen, Ken Blaker, Richard Bloom, Barry Levine, Joseph Mollaie, Kathryn Pellman, Jacob Shofet, Stuart Weiss, Jon Leiberan
- 3. General Public Comment**
 - a. Stakeholders may request to join the Land Use Committee at this time
 - b. All other General Public Comment
- 4. Approval of Outstanding Land Use Committee Minutes**
5/7/24 Land Use Meeting
- 5. Brief Committee Announcements**
 - a. Items for Future Land Use Committee Agendas
 - b. Other Brief Committee Announcements

6. Unfinished Business

- a. Discussion and Possible Action regarding the application for an alcohol license by Shell Gas Station Convenience Store at 9775-9779 W. Pico Blvd.

7. New Business

- a. Discussion and possible action regarding the application to demolish 3 single family residences at 8931-8945 Helms Place and construct a 5-story, 72-unit apartment building, including 12 very low-income units and 19 parking spaces.
- b. Discussion and possible action regarding the application to demolish a two-story apartment building at 1500 Wooster and a duplex at 1510 Wooster St. and construct a 5-story, 26-unit residential units, including 4 very low-income units, situated above ground-floor ancillary office/building management space and a 511-stall parking garage.

8. Adjournment

***Note:** Public comment will be taken for each item where there is discussion and possible action. Public comment and/or participation may occur on other items at the discretion of the Chair. Please note that under the Brown Act, the Committee is prevented from acting on matters brought to its attention during the General Public Comment period; however, the issue may become the subject of a future meeting. In the interest of addressing all items on the agenda, time limits for individual comments and discussion may be set at the discretion of the Chair.*

Motions that are presented at any committee meeting do not represent an official action or position of the SORO NC, until approved by an affirmative vote at a properly noticed meeting of the General Board.

Public Posting of Agendas -

Neighborhood Council agendas are posted for public review as follows:

- Demers & Associates- 1836 1/2 S Robertson Blvd, Los Angeles, CA 90035; The Robertson Blvd Library- 1719 S Robertson Blvd, Los Angeles, CA 90035; The Robertson Recreation Center- 1641 Preuss Rd, Los Angeles, CA 90035; The Office of Councilmember Katy Yaroslavsky - 6380 Wilshire Blvd #800, Los Angeles, CA 90048; Hamilton High School- 2955 S Robertson Blvd, Los Angeles, CA 90034
- www.soronc.org
- You can also receive our agendas via email by subscribing to L.A. City's Early Notification System (ENS)

Reconsideration and Grievance Process -

For information on the NC's process for board action reconsideration, stakeholder grievance policy, or any other procedural matters related to this Council, please consult the NC Bylaws. The Bylaws are available at our Board meetings and our website www.soronc.org

Notice to Paid Representatives -

If you are compensated to monitor, attend, or speak at this meeting, City law may require you to register as a lobbyist and report your activity. See Los Angeles Municipal Code Section 48.01 et seq. More information is available at ethics.lacity.org/lobbying. For assistance, please contact the Ethics Commission at (213) 978-1960 or ethics.commission@lacity.org

In compliance with Government Code section 54957.5, non-exempt writings that are distributed to a majority or all of the Board in advance of a meeting may be viewed at our website (soronc.org) or at the scheduled meeting. In addition, if you would like a copy of any record related to an item on the agenda, please contact us via phone at (310) 295-9920 or via email at info@soronc.org.

SORO NC Board members abide by a code of civility (soronc.org/civilitycode). Any person who interferes with the conduct of a Neighborhood Council meeting by willfully interrupting and/or disrupting the meeting is subject to removal. A peace officer may be requested to assist with the removal should any person fail to comply with an order of removal by the Neighborhood Council. Any person who resists removal by a peace officer is subject to arrest and prosecution pursuant to California Penal Code Section 403.

SI REQUIERE SERVICIOS DE TRADUCCION, FAVOR DE NOTIFICAR A LA OFICINA 3 dias de trabajo (72 horas) ANTES DEL EVENTO. SI NECESITA ASISTENCIA CON ESTA NOTIFICACION, POR FAVOR LLAME A NUESTRA OFICINA AL (310) 295-9920.

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and upon request, will provide reasonable accommodation to ensure equal access to its programs, services, and activities. Translators, sign language interpreters, assistive listening devices, or other auxiliary aids and/or services may be provided upon request. To ensure availability of services, please make your request at least 3 business days (72 hours) prior to the meeting you wish to attend by contacting us via phone at (310) 295-9920 or via email at info@soronc.org.



January 22, 2024

City Planning Commission

cpc@lacity.org

(213) 978-1172

200 N. Spring Street, Room 721

Los Angeles, CA 90012

Dear City Planning Commission,

We are writing to you in support of the proposed 78-unit development, including 12 affordable units, at 8931-8945 Helms Place, case number CPC-2024-3020-DB-VHCA. We urge you to find the project exempt from CEQA and approve the requested Density Bonus and incentives.

The greater Los Angeles region is facing a severe housing shortage, particularly affordable housing. Creating new housing in this neighborhood will help to reduce issues of gentrification and displacement. Abundant Housing LA believes that these housing challenges can only be addressed if everyone in the region does their part.

This project is in a good location for housing, near a park, restaurants, and schools. This project, with 78-units including 12 affordable, is good for Los Angeles and for the region. Again, we urge you to find the project exempt from CEQA and approve the requested Density Bonus and incentives.

Best Regards,

Azeen Khanmalek

Azeen Khanmalek
AHLA Executive Director

Jaime Del Rio

Jaime Del Rio
AHLA Director of Organizer

Tami Kagan-Abrams

Tami Kagan-Abrams
AHLA Project Director

Los Angeles City Planning Commission
Los Angeles City Hall
200 North Spring Street, Room 272
Los Angeles, CA 90012

Subject: Case Number CPC-2024-3020-DB-VHCA
Response to Public Comments for the Proposed Development at 8931-8945 W Helms Place

Dear Honorable City Planning Commissioners,

Irvine & Associates, Inc., represents 8931 Helms LLC (the "Applicant"), for the proposed multi-family housing development project located at 8931-8945 W Helms Place under Case No. CPC-2024-3020-DB-VHCA ("Project"). This thoughtfully designed Project aligns with the City's urgent need for housing and its broader vision for sustainable, transit-oriented development. By adhering to the objectives of the Exposition Corridor Transit Neighborhood Plan (EXPO TNP), the Project embodies a balanced approach to growth, sustainability, and equity. The following provides a detailed overview of the Project's merits and addresses concerns raised by community members.

Advancing Housing Solutions with Strong Community Support

The Project has received substantial support from local residents, businesses, and advocacy groups who recognize the critical role it plays in addressing the City's housing crisis. By introducing 78 residential units—including 11 units designated for Very Low Income (VLI) and 1 Extremely Low Income (ELI) households—the project ensures that housing opportunities are extended to those most in need. These affordable units demonstrate a firm commitment to equitable development.

In addition to addressing affordability, the Project's location within half a mile of the Culver City Metro E Line station leverages transit-oriented principles to reduce automobile dependency and foster a walkable, vibrant community. While we acknowledge concerns raised by some regarding density, parking, and neighborhood compatibility, we are confident that this Project's numerous benefits and alignment with City planning goals address these issues comprehensively.

Consistency with the EXPO TNP

The EXPO TNP was developed to direct growth to transit-accessible areas, promoting housing, economic activity, and environmental stewardship. This Project exemplifies these principles through:

- Proximity to Transit: The Project's location encourages the use of public transportation, reducing traffic congestion and greenhouse gas emissions.
- Housing Contribution: By providing 78 new residential housing units, including 12 units reserved for VLI and ELI households, the development directly advances the EXPO TNP's goal of enhancing housing access near transit corridors.

- **Sustainable Design:** The Project incorporates eco-friendly building materials and exceeds California Green Building Standards, furthering the City's sustainability objectives.

The Project has been carefully designed to comply with applicable height, density, and design standards established by the EXPO TNP, while requesting limited waivers and incentives.

Addressing Public Concerns

Density and Unit Size

The proposed mix of studios, one-bedroom, and a three-bedroom affordable unit have been tailored to meet the diverse needs of individuals, couples, and families. These unit sizes align with urban development norms and maximize the efficient use of space within a transit-oriented framework. Concentrating residential development in proximity to transit reduces strain on infrastructure while supporting regional housing objectives.

Parking and Traffic

Consistent with Assembly Bill 2097, which eliminated minimum parking requirements near major transit stops, the Project provides 17 vehicle parking spaces and 67 bicycle parking spaces. This approach prioritizes sustainable transportation and aligns with City policies aimed at reducing vehicular traffic. Additionally, Condition 16.h of the Staff Report refers to EXPO TNP section 2.6.1, which requires the building owner to provide future tenants within the Project who do not rent parking with annual transit passes at no additional cost to the tenant. Additionally, a comprehensive Vehicle Miles Traveled and Trip Generation Evaluation prepared by Hirsch/Green Transportation Consulting Inc., which was reviewed and approved by the Department of Transportation on November 21, 2024 confirmed that the project will not generate significant parking or traffic impacts.

Infrastructure and Environmental Compatibility

The Applicant has submitted an exhaustive environmental review prepared by Parker Environmental Consultants which concluded that the project will not result in any new or substantially increased significant environmental impacts that were not previously identified in the Expo TNP Program EIR. Key findings include:

- Utilities and Water Conservation: High-efficiency fixtures and drought-tolerant landscaping ensure resource conservation, fully complying with the Los Angeles Green Building Code.
- Air Quality: With implementation of best management practices and the Expo TNP Program EIR Air Quality Mitigation Measure AQ-1 during construction and operation, the Project's air quality impacts would be less than significant for regional and localized air quality emissions.
- Noise: With implementation of best management practices and the Expo TNP Program EIR Noise Mitigation Measures N-1 through N-3, noise impacts to adjacent land uses and sensitive receptors would be less than significant.
- Open Space and Landscaping: With 3,942 square feet of open space—including a rooftop deck and private balconies—the project enhances livability while complementing the neighborhood's character. Ten new trees and drought-tolerant plants will further enhance the site's environmental harmony.

Incentives and Waivers

The Project seeks a modest set of off-menu incentives, including an increase in Floor Area Ratio (FAR) and a reduction in setbacks and open space requirements. These incentives and waivers are essential to achieving the Project's density and affordable housing objectives, as permitted under the State Density Bonus Law (Government Code Section 65915). The State of California is experiencing a housing supply shortage of crisis proportions, and the Density Bonus Law was specifically enacted to incentivize the production of affordable housing by allowing developers to request waivers and incentives necessary for project feasibility. Denial of these requests would require the City to provide substantial evidence that the proposed incentives would result in a specific adverse impact on public health, safety, or the environment that cannot be mitigated.

As affirmed in the Staff Report, the requested incentives align with the EXPO TNP's goal of prioritizing transit-oriented growth and affordable housing, making this Project a vital contribution to addressing Los Angeles' housing crisis.

The Housing Accountability Act

The Housing Accountability Act (HAA) further strengthens this Project's legal protections, limiting the City's ability to deny or reduce the density of housing developments that comply with objective general plan and zoning standards. The California Legislature enacted the HAA in recognition of the critical need to increase housing supply and affordability statewide. This Project's design and requested incentives are fully aligned with the intent of the HAA to facilitate housing production while ensuring compliance with local planning standards.

Conclusion

This Project represents a bold and necessary response to the housing and environmental challenges facing Los Angeles. By adhering to the EXPO TNP and leveraging its transit-rich location, the proposed development addresses critical housing shortages while fostering a sustainable and inclusive community. Additionally, this Project supports the City's recovery efforts following the state of emergency declared due to recent wildfires, which have exacerbated the housing crisis by destroying thousands of structures and displacing residents. We respectfully urge the City Planning Commission to approve the Project as recommended by Planning Staff and advance this transformative opportunity for Los Angeles.

Thank you for your consideration and commitment to creating a more equitable and sustainable city.

Sincerely,

Alexander Irvine
Irvine & Associates, Inc.

CC: Julissa-Lopez Hodoyan, Dept. of City Planning
The Office of Councilmember Heather Hutt

January 7, 2025

Los Angeles City Planning Commission
Los Angeles City Hall
Council Chamber, Room 340
200 North Spring Street
Los Angeles, CA 90012

Re: 1459 S. Hi Point Street; ENV-2023-4997-CE

Dear Commissioners:

I write in support of the appeal and do not believe the project is exempt from CEQA. The project does not comply with zoning ordinances as required for the Class 32 exemption.

While dense housing in areas well served by public transit can help reduce greenhouse gas emissions and vehicle miles travelled, the Project is not located near a rail stop or core rapid transit corridor, but is dependent on infrequent bus service that is much harder to plan a life around than a bus service that usually comes every 15 minutes –and sometimes comes more often, or a rail line which tends to be even more consistent than bus routes & represent a substantial commitment to continue service for a building's entire lifespan. While Pico and Fairfax should both have bus service that comes within 15 minutes or less, Los Angeles has historically struggled to provide bus service as scheduled, and Pico and Fairfax are far from the only corridors where increasing bus service would be hugely beneficial.

The project seems out of scale for the area precisely because of the site's location away from—but in-between—LA's transit-rich nodes of high density development. Squarely in the middle of the 3 mile stretch between the soon-to-open Metro D heavy rail line and the existing Exposition light rail line, the project site will soon be one of the least transit-friendly locations for potential development in the area. The residents of the project will be dependent on their cars, since they will live a 5 minute drive to the nearest freeway and a 35 minute walk to the nearest metro line—or have to wait more than 15 minutes for a bus just to transfer. Since the Project is not located within the walkshed of a rail line or a bus line with adequate service, it is not eligible for the Tier 3 incentives—according to the line drawn, the increased development density in a public transit desert is just as likely to contribute to vehicle-related costs, environmental consequences, and relating difficulties to providing adequate housing, as it is to reduce these concerns by merely increasing density. The location of density, in relation to the transportation network, matters to the Tier 3 exemption and the real life environmental consequences of a project.

The "Q" Condition established by Ordinance No. 168,193 requires 100 square feet of "usable open space" for each dwelling unit and lays out clear criteria for what constitutes "usable open space." The project requires 1,900 square feet of open space in compliance with the "Q" Conditions, but the project analysis assumes a 25 percent reduction in required open space. The project does not qualify for this 25 percent reduction.

Not all space is created equally under Ordinance No. 168,193, as not all space is equally productive as “usable open space” – properly designed usable open spaces can help facilitate connections between neighbors and a sense of freedom and self-determination. In a good usable open space, you can usually find a semi-public sense of privacy or an informal social encounter, depending on whether you’re feeling social or contemplative. Bonds formed in such a space can be organic, since you are able to choose to engage with strangers, but also able to politely move along or keep to yourself. These spaces should be close enough to functional corridors and paths that they are convenient to nearby foot traffic, but should not be high traffic routes themselves - you shouldn't be blocking traffic by hanging out in an open space. In order for “space” to be “usable” and “open” from this perspective of facilitating social interactions, it must be sufficiently large and contiguous to facilitate organic social movement, and sufficiently connected to the public sphere to contribute to the permeability of the building and its sense of being a social space.

In the case of Ordinance No.168,193, *private* open space counts as usable open space “at ground level or the first habitable level,” where the building is most engaged with the surrounding neighborhood, and where the space is most accessible to everyone in the building and members of the public who may be (perhaps casually) invited in. Ordinance NO. 168,193 also requires a minimum width of 15 feet, for such private open spaces, which is not met by the Project design - enough for people to circulate and enough that the space is available to residents for entertaining, rather than being so small to be inevitably devoted to mostly private use. Such spaces cannot be located in the front yard, where open spaces should really be *public* to truly yield the social benefits that open spaces are capable of, and where private open spaces make the building’s community feel more isolated from the public realm rather than more permeable.

Because of the importance of a building’s interconnectedness to making open spaces beneficial, and the importance of providing enough open space that people can spend time in the area while choosing how social they want to be, the roof garden cannot be considered “usable open space” under Ordinance 168,193. Located on the roof, as far as anywhere in the building from pedestrian traffic and as removed from neighbors as possible, the roof garden will function as a hobby-space, just for the few residents particularly invested in rooftop gardening or whoever wants to the view off to a new visitor. For the social and permeability benefits, usable open space should be designed to be convenient to access for the building, such as on the first floor or in the middle of the building, and must provide enough actual free space for users to choose their path, destination, and activities. A narrow corridor between planters on the roof does not provide these benefits.

Taken together, the requirements of Ordinance No.168,193, and the “Q” conditions, and the public policy goals underlying them, highly encourage satisfying open space requirements by providing ground-level open space featuring ground cover, foliage, truly public-facing amenities to interconnect the building to the street-network, and private open spaces that are able to function as semi-private by hosting gatherings and maintaining a connection to the street at ground level. By moving greenery and open space indoors and upstairs, the Project’s design

isolates its inhabitants from the community compared to what is legally required, and fails to contribute to our City's ambitions to create an interconnected and inclusive, rather than isolated and exclusive, Los Angeles.

Sincerely,
Alan Johnson
Resident

Channel Law Group, LLP

8383 Wilshire Blvd.
Suite 750
Beverly Hills, CA 90211

Phone: (310) 347-0050
Fax: (323) 723-3960
www.channellawgroup.com

JULIAN K. QUATTLEBAUM, III
JAMIE T. HALL *
CHARLES J. McLURKIN
GREGORY T. WITTMANN

*ALSO Admitted in Texas

Writer's Direct Line: (310) 982-1760
jamie.hall@channellawgroup.com

January 7, 2025

VIA ELECTRONIC MAIL

Los Angeles City Planning Commission
Los Angeles City Hall
Council Chamber, Room 340
200 North Spring Street
Los Angeles, CA 90012
CPC@lacity.org

**Re: Appeal of Case Nos. DIR-2023-4996-TOC-HCA; ENV-2023-4997-CE;
1459 S. Hi Point Street**

Commission President Lawshe, Vice-President Zamora and Commission Members:

This firm represents Appellant Elaine Johnson, who hereby appeals the approval of Tier 3 Base and Additional Incentives at 1459 S. Hi Point Street for a five-story residential development with one level of subterranean parking, 19 dwelling units, 24 parking spaces and 22 bicycle parking spaces ("Project"). Please see the attached letter from Francis Offenhauser, AIA. The Project does not comply with the "Q" Conditions and is not eligible for the Class 32 Categorical Exemption.

Sincerely,



Jamie T. Hall

Encls.

Cc: Heather Bleemers, Senior City Planner (heather.bleemers@lacity.org)

Q Condition Conformance Review

To: Channel Law Group, LLP
From: Frances Offenhauser, Architectural Consultant
Date: January 6, 2025

Subject: 1459 Hi Point St.; DIR #2023-4996-TOC-HCA including -1A

The Architectural Consultant was tasked by Channel Law Group, LLP (“CLG”) with reviewing the project plans for 1459 Hi Point St, Los Angeles, to evaluate whether the plans approved by the City Planning Department and attached to their Appeal Recommendation Report dated for Jan 9, 2025 comply with the requirements contained in the “Q Conditions” that regulate this property.

Regulations including TOC: The proposed development is a multifamily 5 story apartment building over a single level below-grade garage. It received a Director’s Determination approving a 70% increase in residential unit density, a 50% increase in Floor Area Ratio, a 25% reduction in required open space, and other incentives in exchange for 2 units of affordable housing under the City of Los Angeles “Transit Oriented Communities” bonus incentive program. The only “incentive” changing open space requirements is the 25% reduction in total quantity.

The “Q Conditions” are found in Ord 168,193, effective 10-02-1992. Per the Los Angeles City Planning Department website, the Q Prefix on a Los Angeles Zone

“may impose either temporary or permanent development restrictions on a property.

These restrictions are uniquely applied to an individual or group of properties, and can further limit the types of allowed uses that would otherwise be permitted within the Zone Class.”

These Q Conditions govern this site’s development in addition to other regulations, and all regulations must be met: Zoning for the property (R3-1-O) which specifies Residential Use and Unit Count, Height District including FAR; LAMC Zoning Code definitions and general regulations, including LAMC Sec: 12.21.G (requirements for multifamily open space); and in this case the specific allowances and incentives requested by the Applicant for TOC density bonus program incentives.

“Approved Plans” Inconsistent: Three sets of project plans are attached as “Exhibit D-Approved Plans” the Appeal Recommendation Report. The 3 sets of drawings are: Architectural (undated, displaying no Architect license, titled “New 20 Unit Apartment” “Drexel Construction.com”); Landscape (SLD) (dated 11-08-24 from Savage Landscape Design, Michael Savage Lic # 4,397); and illustrative renderings. A 4th set of drawings was utilized for a Building and Safety PZA review, which is not a part of the Appeal Recommendation report or this Review.

The 3 sets of plans are inconsistent between the plan sets, and fail to match the quantities in the staff written Recommendation Report. Those inconsistencies are central and critical-- because they occur in the areas which must be measured and calculated to substantiate City Planning’s Approval, and in this case specifically affect open space and landscape zoning compliance (at the

“rear yard” and the 4th floor roof/5th floor garden”). See **Attachment A** for the inconsistency in project plans.

The inconsistency with the quantities in the Staff Report reflects a fundamental error. DIR reports and accompanying plans are used by the Department of Building and Safety (the enforcement arm of the Planning Department) as the basis for reviewing and approving building permit plans. If the quantities are erroneous, and in this case the stated amounts in the text fail to match the amounts on plans in Exhibit D and in zoning, the enforcing Agency (Building and Safety) cannot perform.

Findings: The Consultant finds that the project’s plans fail to show conformance with the project Q Conditions for “usable open space”. None of the approved plans actually address or quantify “usable open space”

- a. The Architectural and Landscape plans each present “open space” calculations which do not match the other; the “Approved” plans don’t match each other, and do not match the “Approval” text. This is noteworthy, and affects the rear yard and 4th floor rooftop.
- b. The case is processed for an approved 19 units. The amount of open space required by the Q Conditions is 100 sf X the number of residential units. The Approved plans show 20 units, and the Recommendation Report cites 19 units and calculates 20 units.
- c. The requirements for open space and landscaping in the Approved Drawings, DIR Approval, and Recommendation Report fail to evaluate or substantiate conformance with Q Conditions which apply to this property. (They may refer to a different code requirement for which the Staff Report cites 2,492 SF of open space required). Q Conditions require 1,495 SF of usable open space IF the number of units is 19.
- d. A close reading of the project drawings shows that none of the landscaped or hardscape area qualifies as “usable” – e.g. meeting the definition of “usable open space” as stated in the Q Conditions. Thus 1,495 SF of qualifying usable open space is required and 0 SF is provided; 747.5 SF of usable landscaped open space is required, and 0 SF is provided.
- e. The Appeal Recommendation Report fails to address the specific appeal points by Channel Law regarding open space calculations which are details mandated in the Q Conditions—that the totals and dimensional requirements were not met. TOC does not relieve the project from the Q Conditions- it solely reduces the total by 25%.

SECTION 1: Conformance of project plans with Q Conditions:

The Q Conditions which are pertinent to this discussion are cited verbatim below in quotation marks.

A. OPEN SPACE Q CONDITIONS CALCULATIONS IN EXHIBIT D

The Q Conditions regulate “usable open space”. In the ordinance the dimensions and qualitative requirements for usable open space are clearly specified. The amount which must be “common” in this case in this case is the same as the total, because none of the private open space provided qualifies as “private” under the Q conditions.

1. Q Conditions base “total” amount of “usable open space” requirement on number of units

“10. Open Space: A minimum of 100 square feet of usable open space shall be provided for each dwelling unit. Parking areas, driveways, front yard setback areas and rooftops

shall not be included as open space. To be considered as “usable open space” the project shall meet the following criteria: (the further criteria are shown in # 2-4 below)

Finding: Neither set of Approved Plans provides a “usable open space” calculation. Each plan set does have its own “open space” calculation, without showing its source Code derivation. This failure to provide the correct calculations leads to totals that are not approvable. The inclusion of 592 sf of “rooftop” is not permitted in the Q Conditions. See **Attachment B** and **C**

	<i>Calculated For CLG</i>	<i>Calculated by Drexel in Approved Plans</i>	<i>Calculated by SLD in Approved Plans</i>
Required: “Total Usable Open Space”	1,495 sf <i>19 DU x 100 sf/unit=</i> <i>1900 sf x .75</i> <i>(reflects 25%</i> <i>reduction in total per</i> <i>TOC)</i>	INCORRECT CALCULATION: 2,156.25 SF (8x175+11x125+ 1x100=2,875 sf x.75)	Fails to provide
Provided: “Total Usable Open Space”	See #2 below	INCORRECT CALCULATION 2,492 SF labeled as “open space provided” As noted below, this includes non-compliant private balconies, no-compliant rooftop (562 SF), and substandard dimension spaces. (see #2 below)	INCORRECT CALCULATION: 749 SF labeled as “total common open space area”, with NO reference to usable

2. Q Conditions state qualitative and dimensional requirements for open space to qualify as “usable”:

“b. Common Usable Open Space: Each common usable open space area shall have a total area of at least 400 square feet and shall have an average width of 20 feet with no width less than 15 feet at any point. Recreation rooms at least 600 square feet in area may qualify as common open space, but shall not exceed more than 25 percent of total open space required.

Common open space areas shall incorporate recreational amenities such as swimming pools, spas, picnic tables, benches, tot lots, ballcourts, barbecue areas, sitting areas, etc. to the satisfaction of the Department of City Planning. (Note: amenities that meet the Department of Recreation and Parks specifications pursuant to Section 17.12F LAMC may be credited against fees required under Section 12.33 of the LAMC) •”

Findings: The approved project plans do not demonstrate that quantities and dimensions required are met. See **Attachments B** and **C**

While a 400 sf common open space minimum may appear to be met in the rear yard, its dimensions are non-compliant-

- while the “average width” of 20’ is dimensioned in the rear yard area on the plans, the “floor area” or “area” is less. The thickness of the outer walls reduced the dimension below 20’. Further, building sections show that this area is broken up by 4’ high planter walls, making it non-continuous and not “usable”. To make the areas atop the 4’ planter walls usable, they would need to be accessible to people via stairs, and safe for those people with guardrails-- as the height exceeds 30” drop.
- The minimum width of the usable area at 15’ is not achieved in either the rear yard or the rooftop—if any argument is made to include the rooftop.

	<i>For CLG</i>	<i>Stated by Drexel in Approved Plan</i>	<i>Stated by SLD in Approved Plans</i>
Required: Min 400 SF usable and having 20’ av width, 15’ min dim, having usable recreational amenities	1,495 sf	See #1 above Dimension on plan showing 20’ is to outside of exterior wall, not a clear floor area, this the average falls below 20”	Fails to provide
Provided:	ACTUAL: Zero	INCORRECT CALCULATION: 950 sf Rear Yard 950 sf : 400 sf min usable space in rear yard provided but not meeting 20’ average width, and 15’ min dimension	749 SF

3. Q Conditions state 50% minimum of “Common Usable Open Space” must be planted

“A minimum of 50 percent of the common usable open space areas shall be planted in ground cover / shrubs or trees and shall include at least one 24-inch box tree for every three dwelling units (Trees shall be planted within open space areas). An automatic irrigation system shall be provided for all required landscaped areas. Landscaped areas located on top of a parking garage or deck shall be contained within permanent planters at least 30 inches in depth (12 inches for lawn/ground cover) and properly drained.”

Finding: A minimum of 747.5 sf the total “common usable open space” is required to be landscaped/planted, all having ground cover, plus 6 trees on site. These quantities are not met.

- The planted areas are in raised planters, meaning they are not accessible and usable. If there is an argument that they might be usable for gardening, they fall short of the 747.5 SF required quantity, and 50% of the 570 SF is not reachable.
- Raised planters vs usable planting areas is a critical architectural distinction. As noted in #2 above, stairs and guardrails would be required to safely access these areas. In 1992 “usable” planting areas on parking structure rooftops were called “planted” or “vegetated” roofs, and had a full soils covering across the entire roof to make the areas “usable” for strolling or picnicking. Today these are known as “green roofs”. Their drainage is carefully controlled—hence even in 1992 in these Q Conditions the drainage

was regulated to contain mud flow and still prevent root rot. Planters raised 4' above a recreational deck do not qualify as "usable" space.

- Further, the landscape plans show 0 (zero) 24" box trees (see LP-1) **Attachment D**

	<i>For CLG</i>	<i>Stated Drexel in Approved Plan</i>	<i>Stated SLD in Approved Plans</i>
Required: Total Common Usable Open Space Landscape	747.5 sf all with ground cover <i>Min 50% x 1,495 sf</i> 6 trees: 1 tree/dwelling unit	Fails to provide	INCORRECT CALCULATION 187.25 SF (25% x 749 SF) (stated as "Total Common Open Space Landscape Area")
Provided: Total Common Usable Open Space Landscape	0 Trees- Ground cover- 0 SF 570 SF ground cover--394 sf rear yard + 176_roof planters- but these do not qualify as "usable"	INCORRECT CALCULATION 2,606 "Total Landscaped Area" 394 SF in rear yard Mickey on roof	INCORRECT CALCULATION 385 SF stated by SLD Trees shown are street trees- not allowed as a part of open space calculation

4. This project does not have any qualifying "private open space" as defined in the Q Conditions

"a. Private Open Space: Patios and yards (located at ground level or the first habitable room level) which are part of a single dwelling unit and are enclosed by solid screen material at least four feet in height may be included as usable open space provided said areas have a horizontal dimension of at least 15 feet in width."

Finding: None of the private patios depicted on the drawings at the ground level or first habitable floor have a minimum dimension of 15'. Thus, all usable open space which is required must be "common." (See **Attachment B**)

Respectfully Submitted:

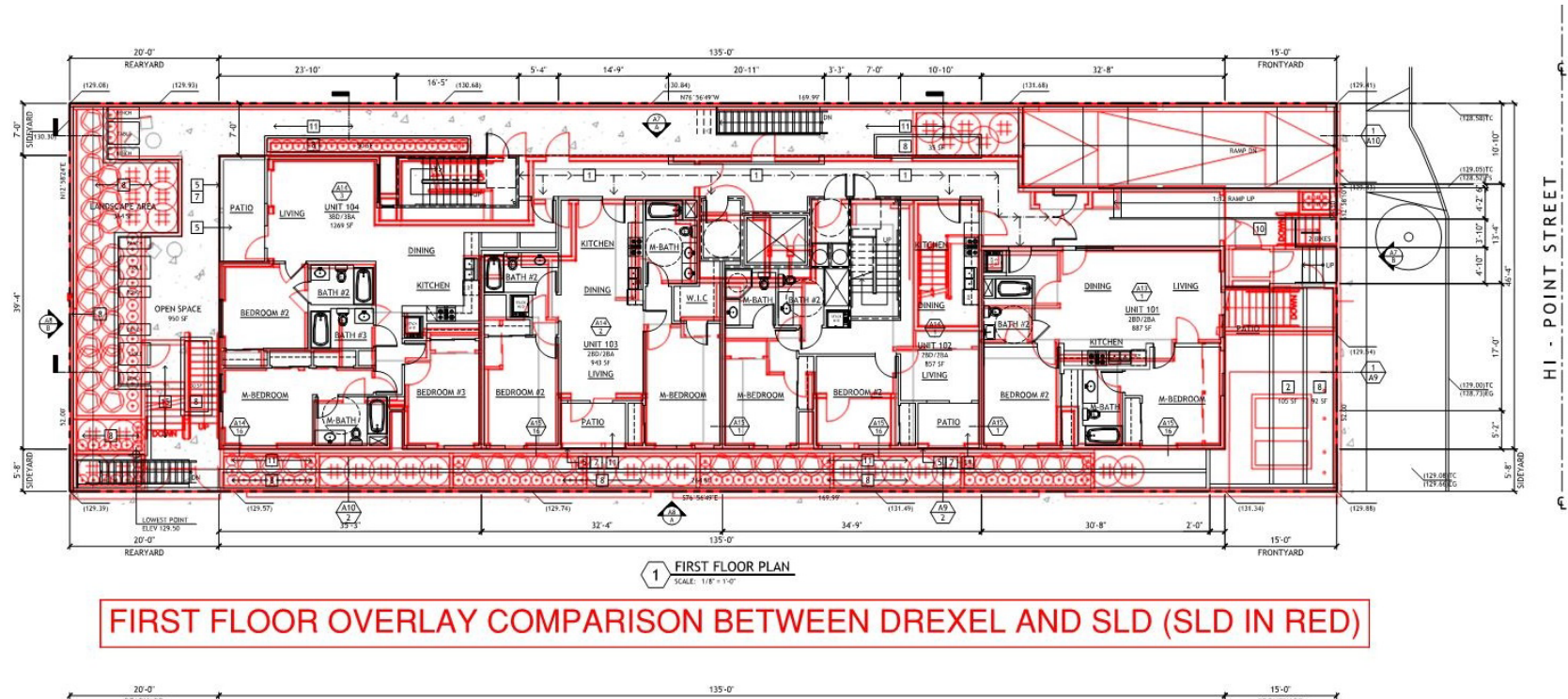


Frances Offenhauser, AIA, Licensed Architect #C1186

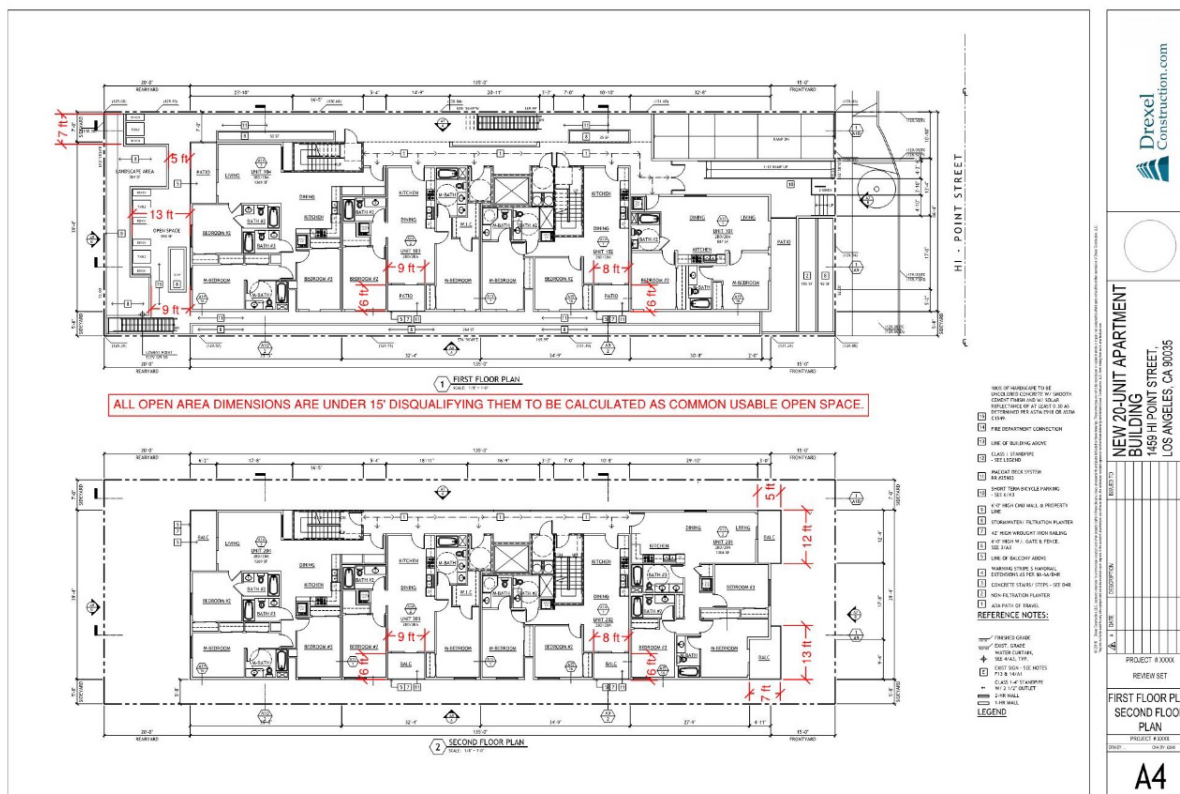
Encls.

ATTACHMENT A

Inconsistency in plans Approved in Director Determination. Sheet A4 of Drexel Construction



ATTACHMENT B



ATTACHMENT F

5th floor open space not shown;
architectural drawings omit aspects required for landscape approval





WILLIAM F. DELVAC
T: 310.254.9050
E: Bill@AGD-Landuse.com

January 16, 2025

City of Los Angeles
City Planning Commission
200 North Spring Street, Room 272
Los Angeles, CA 90012

BY EMAIL: cpc@lacity.org

RE: CASE NO. DIR-2023-5190-TOC-HCA; ENV-2023-5191-CE 3851-3855 S.
GRAND AVENUE, LOS ANGELES, CA 90037

Honorable City Planning Commissioners:

On December 26, 2023, the University of Southern California (University) submitted an appeal (Appeal) for the proposed mixed-use project (Project) located at 3851-3855 S. Grand Avenue (Project Site). The appeal is Item No. 9 on your January 23, 2025 meeting agenda. The Applicant has requested that the matter be continued until April 10, 2025.

The University, as appellant, supports the Applicant's request for a continuance. We have very recently had discussions with the Applicant that are encouraging and may lead to resolution of the University's concerns. However, additional time is needed if the parties are to reach resolution.

Therefore, the University respectfully requests that the Commission continue this matter until its April 10th meeting. We believe this will best serve everyone's interests.

Very truly yours,

A handwritten signature in blue ink that reads "William F. Delvac".

William F. Delvac

cc: Council Member Curren Price
Laurie Stone, USC
Bryan Eck, USC



January 17, 2025

The Honorable, Monique Lawshe, President
and Commission Members
Los Angeles City Planning Commission
City Hall
200 North Spring Street
Room 532
Los Angeles, CA 90012

**Re: CPC-2008-3470-SP-GPA-ZC-SUD-BL
Agenda Item No. 11, January 23, 2025
Warner Center 2035 Plan, Five Year Status Report**

Dear Honorable Commissioners:

On behalf of the Warner Center Association (WCA) Board of Directors, representing many of the largest landowners and employers in the Warner Center community, I am writing to provide comments related to the Warner Center 2035 Plan (the "Plan"), Five (5) Year Status Report. Before I get into my comments, I would like to take a moment to compliment Sheila Toni and Shane Strunk, the planning staff assigned to implement the Plan. As evidenced by the Staff Report they are very thorough and, as one who works with them on Plan related matters frequently, they are always responsive, thoughtful, knowledgeable and a pleasure to work with.

As a bit of background, having served as the Co-Chair of the Citizen's Advisory Committee appointed to work with City Planning staff to develop the Plan, I am intimately familiar with its history, intent and its implementation. Following are comments related to the Staff Report and my general observations of Plan implementation.

**I. PROJECTS CONFORMING TO THE PROVISIONS OF THE PLAN
MUST BE PROCESSED IN A TIMELY MANNER**

Los Angeles Municipal Code (LAMC) Section 13B.4.2D.3 applicable to Project Compliance decisions, states "The Director shall render the initial decision within 75 days of the date the application is deemed complete or when an Environmental Impact Report (EIR) is required, the date the EIR is certified as complete consistent with State

SERVING WARNER CENTER FOR OVER 30 YEARS

21600 OXNARD STREET, SUITE 630 • WOODLAND HILLS, CA 91367
(818) 716-2689 • FAX (818) 593-6184

Law”. While planning staff works diligently, it is rare that a Project Compliance determination letter is rendered within the 75-day statutory period.

REQUEST: We respectfully request that adequate staff be assigned or, that the assigned Warner Center staff not be reassigned to work on projects outside of Warner Center, to allow project applications to be processed within the code required timeframe. I should note that we are particularly protective of the assigned Warner Center staff because, in addition to standard application fees paid for by Warner Center project applicants, additional developer fees that are paid into the Warner Center Trust Fund go to supplement the City Planning budget to assure adequate staffing of the Warner Center 2035 Plan.

II. THE TRANSPORTATION ELEMENT OF THE WARNER CENTER 2035 PLAN EIR SHOULD BE RESTUDIED TO REFLECT CURRENT PRACTICES AND THINKING

The transportation element of the Plan was prepared well before the Plan’s adoption in 2013, at a time when the traffic engineers were focused on maintaining the Level of Service at intersections and moving automobiles in the most efficient manner. Since adoption of the Plan, the City of Los Angeles and the State of California have refocused from the movement of automobiles to the movement of people, and with this shift in thinking has come a focus on the development of mixed-use communities and the implementation of alternative means of transportation rather than physical infrastructure improvements.

As the posterchild of a well conceived mixed-use community, the Warner Center 2035 Plan’s transportation program must be reimaged from an auto-centric plan to one focused on pedestrian enhancement, alternative transit methods, interconnectivity and way finding. We strongly encourage the next iteration of the Warner Center transportation element focus on these factors.

REQUEST: The Staff Report indicates the Transportation Restudy is anticipated to begin this year based on achieving the one-third threshold identified below, however, Section 10.5.1 of the Plan reads:

Schedule for the Commencement of the Restudy.

The Department and DOT shall commence a restudy of this Plan no later than: 1) July 1, 2033; 2) when the Department approves 24,000 cumulatively approved dwelling units; 3) when the Department approves 30 million square feet of cumulatively approved residential floor area; or 4) when the Department approves 28 million square feet of cumulatively approved Non-Residential floor area, whichever comes first. Notwithstanding the foregoing, future transportation restudies of this Plan shall occur at 1/3 intervals when each

1/3 benchmark is first reached within any of the three categories of the Build-out Limitation (for example, and for illustrative purposes only, the transportation restudy at the first 1/3 benchmark would be required at the time 1/3 of the 32,600,000 square foot Build-out Limitation for residential floor area is reached, even though 1/3 of the Build-out Limitations for residential units and non-residential floor area have not been reached); **provided that there shall be no more than 10 years between transportation restudies** [emphasis added].

The last provision (sentence) of this Section clearly directs the Transportation Restudy to begin immediately. Accordingly, a Transportation Restudy is required to be undertaken immediately as no such restudy has occurred since adoption of the Plan in December of 2013, well over 10 years ago.

III. THE PLAN MUST BE IMPLEMENTED IN A PRACTICAL AND PRAGMATIC FASHION, AS INTENDED WHEN DRAFTED

The Plan includes a number of standards and guidelines to be followed in the site planning and design of a Project. It is the intent of the Plan to provide Projects that meet the standards and generally achieve the guidelines of the Plan with a direct and expeditious path to entitlement.

For illustrative purposes, I present the following comments, not as a criticism of those implementing the plan, but with the intent of highlight challenges and ways the implementation process can be improved.

A. Master Planned Projects that are also planned in Multiple Phases must be given special consideration by planning staff in relation to the implementation of LAMC Section 12.33. Park Fees and Land Dedication.

The Plan includes requirements for Publicly Accessible Open Space (PAOS) up to 15% of a Project's net site area. Meanwhile, LAMC Section 12.33 requires all residential subdivisions with over 50 residential units to dedicate land, make park improvements, pay a park fee or, provide a combination of land dedication and park fee payment (which is in addition to the open space requirements of the LAMC and the Specific Plan). The Plan was adopted three years prior to the consideration and the effectuation of the new Park Fees and Land Dedication requirements (January 11, 2017) and was therefore unable to anticipate the complicating factors that the new law would ultimately impose on larger scale, Master Planned/Multi-Phased Warner Center projects.

It is also important to note that Projects in Warner Center on lots greater than five acres must file for a Master Plan. Projects greater than five acres and composed of multiple lots (all of which may be less than five acres individually), may also file for a Master Plan. Experience dictates that Master Planned Projects ultimately provide far

more public space than required by the Plan and are therefore eligible for credit against the LAMC Section 12.33, Park Fees and Land Dedication requirements.

The challenge has been getting the Department of Recreation and Parks to agree on an appropriate Condition of Approval by which to: 1) grant Warner Center, Master Planned Projects the Park Fee and Land Dedication credits they are due under law and 2) allow City Planning to decide whether a Project is to dedicate land, make park improvements, pay a park fee or, provide a combination of land dedication and park fee payment as prescribed in the Warner Center EIR Mitigation Program. This issue has come to light with the first Warner Center, Master Planned Project that is subject to the provisions of the new Park Fee and Land Dedication requirements. It literally took years for Recreation and Parks to abide by the City Planning Commission and City Council Conditions of Approval associated with the Project. Recreation and Parks has taken an inappropriately aggressive position, that their opinion supersedes all other decisions, and this obstinance must be addressed.

REQUEST: We respectfully request that Warner Center, Master Planned/Multi-Phased Projects subject to LAMC Section 12.33 (Park Fees and Land Dedication requirements) be permitted to grant excess open space for park purposes by dedicated easement rather than in fee (for purposes of obtaining credits against the park fees). Also, because of the unique provisions of the Plan relative to Master Planned/Multi Phased Project, as well as the requirements of the Graduated Floor Area Tables, we ask that credit be granted for the land dedicated (by easement or fee at the choosing of the applicant) for park purposes anywhere within the Master Planned Project and that funds collected early in the Project phasing be used to compensate the applicant (or their successors) for land dedication requirements in later phases of the Project. Finally, due to the unique aspects of the Warner Center 2035 Plan, we ask that City Planning determine the most appropriate way in which Warner Center, Master Planned/Multi-Phased Projects comply with the provisions of LAMC Section 12.33 (as advised but not directed by Recreation and Parks).

B. Per Section 9.5 of the Plan, a Warner Center Cultural Amenities Committee must be established.

Section 9.5 of the Plan requires the establishment of a Warner Center Cultural Amenities Committee “responsible for the appropriate disbursement of the Warner Center Cultural Amenities Trust Fund within the Plan area.” The Staff Report indicates that this committee is in the process of being established, we strongly support this effort so the funds paid into the Trust Fund can be utilized.

Also, Projects wishing to include on-site art should be permitted to do so and should be granted full credit against their Warner Center Cultural Amenities Development Fee, presuming standards set forth by the City of Los Angeles Department of Cultural Affairs are met. Previously, Project applicants have been informed by City Planning staff that they would not receive credit against their Warner Center Cultural Amenities Development Fee for the provision of on-site art, until the committee is appointed, and the Warner Center Cultural Amenities Master Plan is adopted. This

position is incorrect and all Projects wishing to incorporate on-site art must be granted full credit against their Warner Center Cultural Amenities Development Fee. This is the way the Arts Development Fee is implemented citywide and the way that it is intended (and is written) to be implemented in Warner Center.

REQUEST: The Warner Center Cultural Amenities Committee should be established immediately and all Projects choosing to include on-site art must be granted full, dollar for dollar credit, against their Warner Center Cultural Amenities Development Fee obligation. We also strongly encourage the development of the Warner Center Cultural Amenities Master Plan be done in a public manner and not limited to city staff.

C. Publicly Accessible Open Space Should be Permitted to be Closed to the Public Between the hours of 10 p.m. and 6 a.m., seven days a week.

As discussed in the Staff Report, Warner Center Projects must include Publicly Accessible Open Space (PAOS) and must make it accessible to the public from 6 a.m. to 10 p.m. daily. It is important however, in the off hours (between 10 p.m. and 6 a.m.), for this space to be secured and as necessary, fenced and gated as a means of ensuring public safety and security. However, planning staff, in several instances has refused to permit gates that would be used to secure the PAOS in off hours. The planning staff position on this matter is inconsistent with the best public safety practices and inconsistent with the Plan,

REQUEST: We request that PAOS be permitted to be gated and secured between the hours of 10 p.m. and 6 a.m. daily.

IV. CONCLUSION

While not perfect, the Warner Center 2035 Plan has established itself as one of the most, if not the most, forward thinking and effective land use plans in the City of Los Angeles. The comments and requests identified above are intended not as criticism but as a means to help make the implementation of the Plan more effective and efficient.

On behalf of the WCA's Board of Directors, thank you very much for your time and consideration of these comments and requests. Please feel free to contact me at (818) 716-2780 or brad@raa-inc.com if you should have any questions related to this matter.

Very Truly Yours,



Brad M. Rosenheim
Executive Director

WARNER CENTER ASSOCIATION

DAY OF HEARING SUBMISSIONS



CPC-2024-3020-DB-VHCA on Helms Place

Acela Gonzalez <lindaourangel@gmail.com>
To: cpc@lacity.org

Wed, Jan 22, 2025 at 8:04 PM

Dear Los Angeles Commission,

I strongly oppose the proposed development project CPC-2024-3020-DB-VHCA on Helms Place. This project threatens the unique character and close-knit community that have thrived on our street for generations.

Helms Place is more than just a street; it's a haven within Los Angeles, where multi-generational families reside, children play freely, and neighbors support one another. The proposed development, with its out-of-scale design and focus on single-unit dwellings, disregards our neighborhood's established architectural harmony and family-oriented nature. My house was where the architect who led that Helms Pl project lived, where I raised my three boys and now my grandson lives here

This project would:

- **Destroy irreplaceable history:** The development plans include demolishing a property with a tree planted by Holocaust survivors, which symbolizes resilience and hope. Another home slated for demolition represents the original architectural style of our neighborhood.
- **Disrupt community cohesion:** The proposed building's design clashes with the existing neighborhood aesthetic, creating an eyesore and undermining the sense of shared identity we have cultivated.
- **Prioritize profit over people:** The developers have demonstrated a disregard for the community's needs and concerns, offering "affordable" units at exorbitant rents inaccessible to most working-class families.

We are not opposed to development, but it must be responsible and considerate of existing communities. This project, as proposed, prioritizes personal gain over the preservation of our neighborhood's unique character and the well-being of its residents.

We have the support of the SoRo Land Use Committee and the SoRo Council, which recognize this project's detrimental impact. We urge you to join them in rejecting this proposal and protecting the heart of our community.

Thank you for your time and consideration.

Sincerely,

Acela Gonzalez
8917 Helms Pl.
Los Angeles, CA 90034



January 22, 2024

City Planning Commission

cpc@lacity.org

(213) 978-1172

200 N. Spring Street, Room 721

Los Angeles, CA 90012

Dear City Planning Commission,

We are writing to you in support of the proposed 78-unit development, including 12 affordable units, at 8931-8945 Helms Place, case number CPC-2024-3020-DB-VHCA. We urge you to find the project exempt from CEQA and approve the requested Density Bonus and incentives.

The greater Los Angeles region is facing a severe housing shortage, particularly affordable housing. Creating new housing in this neighborhood will help to reduce issues of gentrification and displacement. Abundant Housing LA believes that these housing challenges can only be addressed if everyone in the region does their part.

This project is in a good location for housing, near a park, restaurants, and schools. This project, with 78-units including 12 affordable, is good for Los Angeles and for the region. Again, we urge you to find the project exempt from CEQA and approve the requested Density Bonus and incentives.

Best Regards,

Azeen Khanmalek

Azeen Khanmalek
AHLA Executive Director

Jaime Del Rio

Jaime Del Rio
AHLA Director of Organizer

Tami Kagan-Abrams

Tami Kagan-Abrams
AHLA Project Director



8931-8945 Helms Place | Case CPC-2024-3020-DB-VHCA

Brianna Cornejo-Perez <briannacornejoperez@gmail.com>
To: cpc@lacity.org

Wed, Jan 22, 2025 at 9:08 PM

Dear All,

I strongly oppose the proposed development project CPC-2024-3020-DB-VHCA on Helms Place. This project threatens the unique character and close-knit community that have thrived on our street for generations.

Helms Place is more than just a street; it's a haven within Los Angeles, where multi-generational families reside, children play freely, and neighbors support one another. The proposed development, with its out-of-scale design and focus on single-unit dwellings, disregards our neighborhood's established architectural harmony and family-oriented nature.

This project would:

- **Destroy irreplaceable history:** The development plans include demolishing a property with a tree planted by Holocaust survivors, which symbolizes resilience and hope. Another home slated for demolition represents the original architectural style of our neighborhood.
- **Disrupt community cohesion:** The proposed building's design clashes with the existing neighborhood aesthetic, creating an eyesore and undermining the sense of shared identity we have cultivated.
- **Prioritize profit over people:** The developers have demonstrated a disregard for the community's needs and concerns, offering "affordable" units at exorbitant rents inaccessible to most working-class families.

We are not opposed to development, but it must be responsible and considerate of existing communities. This project, as proposed, prioritizes personal gain over the preservation of our neighborhood's unique character and the well-being of its residents.

We have the support of the SoRo Land Use Committee and the SoRo Council, which recognize this project's detrimental impact. We urge you to join them in rejecting this proposal and protecting the heart of our community.

Thank you for your time and consideration.

Sincerely,

Brianna Cornejo-Pérez



8931-8945 Helms Place | Case CPC-2024-3020-DB-VHCA

Bliss Franco <blissfranco@gmail.com>

To: cpc@lacity.org

To whom it may concern,
I am unfortunately unable to make the hearing as I am a teacher and there were no substitutes available.

I just wanted to reach out to reiterate how much of a massive negative impact this project would have on our lives and the lives of those in our community. In these past few days, we have seen continues to have a small town feel for so many of us natives. Being born literally on Helms Place, this little community is more than just a street that developers have found as an opportunity for peace in Los Angeles. Helms Place contains history, multigenerational homes, children playing safely in their front yards, people trying to continue to work hard and conserve what we have built on properties they want to demolish. Another one of the homes is very original to the architecture of the homes built on the block when it was first built. My family even took into consideration the 90's. We did not want our home to be an eye sore to the neighbors, so my parents left the facade original. This building does not fit into our neighborhood at all and would be extremely difficult to change our lives just because they have the means to do so, a sad recurring trend.

A group of us neighbors attended SoRo Meetings with the land use committee and the SoRo council and we had their complete support. They agree that these developers did not take the community into consideration here is to make a personal profit. They have planned nothing to contribute to the community. The project is anti-family, the plans are built for single units only. The SoRo committee Helms Place has four schools within walking distance, families with young children, elderly couples, and growing families. They claim that they will offer low income housing, when asked how many units. The rent is not hard working middle class friendly, it is set at \$1524 a month. That rent is now even low enough to justify the variances they are asking for.

Thank you for your attention to this very important matter. We hope you can take all that our neighbors are voicing into consideration. We may not be rich developers, but what we contribute to the community is what makes our city one of a kind.

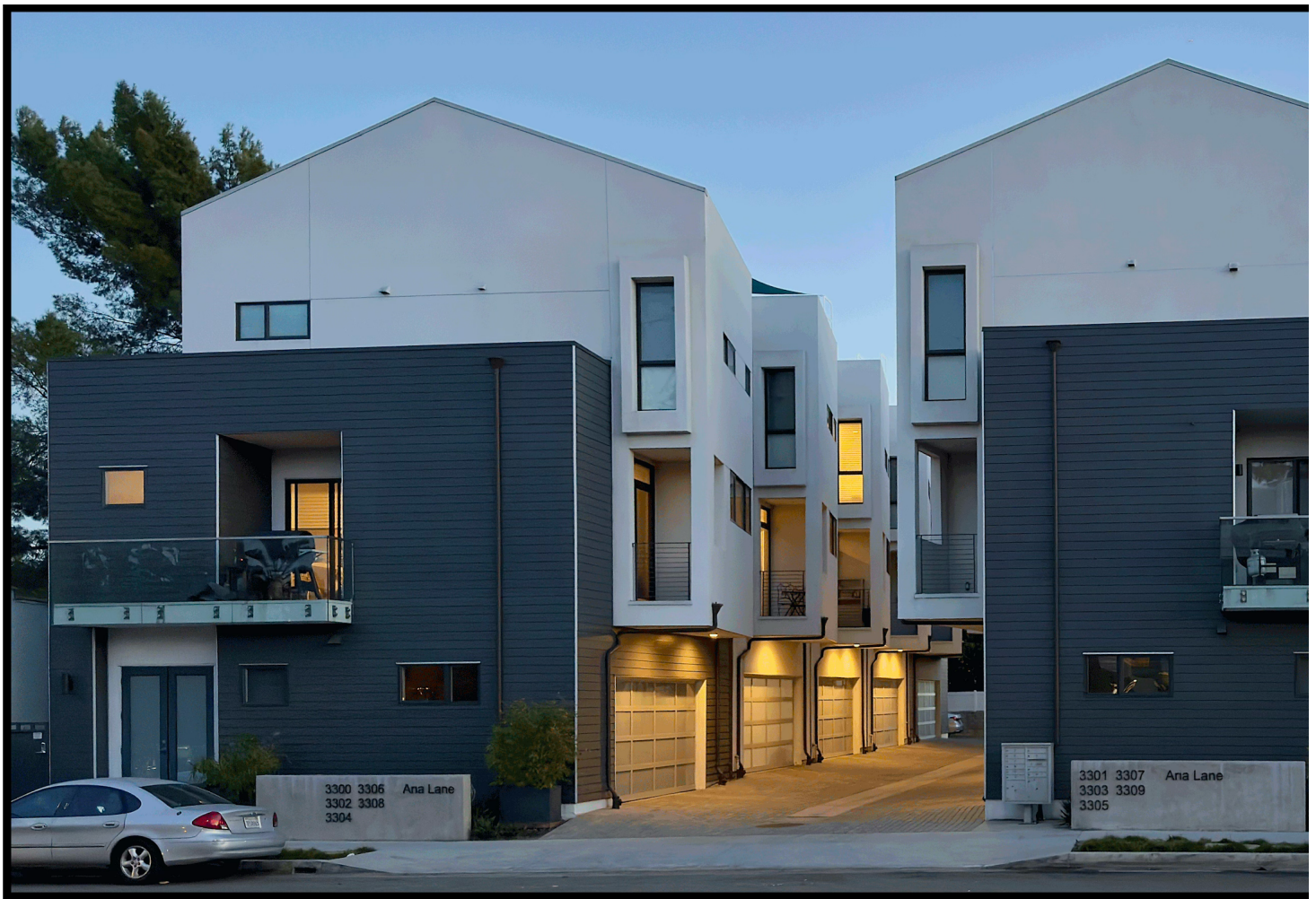
Kindly,
Bliss M. Franco
8926 Helms Place
Los Angeles, CA 90034
(310) 595-0230

Listed below are more reasons of why this development should not be allowed to carry on and no incentives should be granted:

- Our single family neighborhood has 32 single-family houses, about 75 people[†]. The development of 78 units adds 160 people, by the "family" definition (2-3 people) stated by the city.
 - Units of 400-500 sq ft are not "family" size, barely adequate for two. If children are packed into studios and singles, the population will soar and the children will suffer.
 - The **2.a incentive** of 75% increase in FAR per Expo TNP section 2.2.1 should not be granted: it creates a super-high density project^{††} in a small neighborhood without the city's (singles are not family), and lack of stated sewage and site security plans.
 - The 2.a incentive enabled rear setback eclipses the sky to the rear of my property, destroying any privacy on our terrace or in our backyard.
 - The same setback pushes the building against the property line, worsening access for emergency vehicles and creating fire and evacuation hazards.
 - The **2.b incentive** of 100% reduction in non-residential use is an excuse, per TNP 2.2.3, to provide parking in a Expo TNP zone that is expected to solely use public transport. The parking garage footage should be used to create more low income housing not requiring cars, lowering the project height by one story. The 2.b incentive recognizes a small neighborhood.
 - The **2.c incentive** deletes the TNP 4.2.5.C.1 car tire squeal parking garage mitigation requirement for a neighborhood that is purely residential and should not be granted. The
 - The **2.d incentive**, decreasing the open space required by LAMC 12.21.G.2, reduces the open space for 78 to 160 residents to increase an already overpacked development. Multiple residential dwelling units opportunities for outdoor living and recreation; provide safer play areas for children as an alternative to the surrounding streets, parking area which is designed and intended to be used for active or passive recreation." As the ordinance itself predicts, 2.d will force recreation to spill out at street level, ruining the quiet neighborhood.
 - The **2.e incentive** TNP 4.2.1.A. allows radical reduction of setbacks, creating a super high density development to increase lessor profits and should not be granted.
 - It violates the spirit of the Helms and Krammerwood setbacks, reducing green space, forcing removal of established trees, and changing sight lines.
 - The combination of height and extraordinary setbacks:
 - Eclipses sunlight from noon through sunset to the buildings to the east. Our west facing orchid greenhouse window becomes useless.
 - Makes it impossible for me to justify our planned solar panels.
- 17 parking spaces allocated for 160 people is adequate only if the city requires the lessor to agree that all non-parking lease agreements restrict vehicle ownership and street parking permits for current residents needs to be required by the city to enforce the rule.
- The Developer and successor lessors, pledging that their rental plans are adequate to ensure the economic viability of this super high density development, should contractually agree to income rental relief or the elimination of rental price requirements for these incentives.
- The tree in the first image was planted by a holocaust survivor. He lived in the house where it is sited. Granting the off-menu setback exception kills this tree *and* its significant history.
- What development would work in this neighborhood if the 8931-45 Helms development is inappropriate for a neighborhood by being too high, lacking all setbacks, packing 2x the number of units than the aesthetics of a quiet cul de sac neighborhood?
- Other developments can act as a guide, and you don't need to walk far from Helms to find one. The second image below is of the recent *Ana Lane* Development at 3300-09 National Avenue. It includes what looks like wood siding (which incidentally matches the shingles of the building to the right) and stucco is both modern but not overly so. At 2½ stories, each lot provides a better version with *four* townhouses, instead of five, and a neighborhood-standard setback could still qualify and be a better fit for the neighborhood. Even doing one lot this way would

the neighborhood.





† The apartment is on Cattaraugus, empties there, and has adequate gated parking.

†† In the footprint of three single-family homes of 3 to 5 people each, for a total of 15, it packs 10 times as many people (~160). This is super-high density for any small neighborhood.



8931-8945 Helms Place | Case CPC-2024-3020-DB-VHCA

Carmen Garcia <cgarcia@douglasemmett.com>
To: cpc@lacity.org

Wed, Jan 22, 2025 at 4:09 PM

Dear Los Angeles Commission,

I strongly oppose the proposed development project CPC-2024-3020-DB-VHCA on Helms Place. This project threatens the unique character and close-knit community that have thrived on our street for generations.

Helms Place is more than just a street; it's a haven within Los Angeles, where multi-generational families reside, children play freely, and neighbors support one another. The proposed development, with its out-of-scale design and focus on single-unit dwellings, disregards our neighborhood's established architectural harmony and family-oriented nature.

This project would:

- **Destroy irreplaceable history:** The development plans include demolishing a property with a tree planted by Holocaust survivors, which symbolizes resilience and hope. Another home slated for demolition represents the original architectural style of our neighborhood.
- **Disrupt community cohesion:** The proposed building's design clashes with the existing neighborhood aesthetic, creating an eyesore and undermining the sense of shared identity we have cultivated.
- **Prioritize profit over people:** The developers have demonstrated a disregard for the community's needs and concerns, offering "affordable" units at exorbitant rents inaccessible to most working-class families.

We are not opposed to development, but it must be responsible and considerate of existing communities. This project, as proposed, prioritizes personal gain over the preservation of our neighborhood's unique character and the well-being of its residents.

We have the support of the SoRo Land Use Committee and the SoRo Council, which recognize this project's detrimental impact. We urge you to join them in rejecting this proposal and protecting the heart of our community.

Thank you for your time and consideration.

Sincerely,

Carmen Garcia
Homeowner
8932 Helms Place
Los Angeles, CA 90034

Carmen García
Executive Assistant to Jordan Kaplan
Executive Director, Kaplan Foundation and Panzer Foundation

Douglas Emmett Management, LLC
1299 Ocean Avenue, Suite 1000
Santa Monica, CA 90401
(T) 310.255.7721
cgarcia@douglasemmett.com
www.douglasemmett.com

Please show respect to people who don't deserve it, not as a reflection of their character, but a reflection of yours.

On Tue, Jan 7, 2025 at 4:24 PM Carmen Garcia <cgarcia@douglasemmett.com> wrote:

Dear Julissa,

I am writing to express my concern about the proposed development **8931-8945 Helms Place** and sincerely urge you to deny the requested incentives, which would allow for a project of this scale in our neighborhood. Like my neighbors, I live in a quiet, established neighborhood comprised of mainly single-family homes. This proposed development of 78 units, potentially housing an additional [Approximate number based on 2-3 per unit] people (as per the developer's own 'family' definition), would fundamentally alter the character and density of our community. For instance, the increased population would lead to more traffic, the high-rise buildings would disrupt the skyline, and the reduced open space would change the overall feel of the neighborhood.

Inappropriate Unit Size and Population Density:

The proposed units, ranging from 400-500 square feet, are woefully inadequate for families and barely sufficient for two adults. Packing families into such cramped quarters would not only compromise their quality of life but also likely lead to a population surge exceeding the developer's estimates. This density is simply unsustainable for our neighborhood's infrastructure and resources.

Unjustified Incentives:

The developer's requests for the following incentives, as outlined in the Expo TNP, are unwarranted and detrimental to our neighborhood. These incentives, such as the 75% FAR Increase and the Property Line Setback, would allow for a project that is out of scale with the surrounding area and could create safety hazards and disrupt the current peace.

- **2.a Incentive (75% FAR Increase):** This incentive allows for a super-high density project that is completely out of scale with the surrounding area. Our neighborhood lacks the capacity to absorb such a large influx of residents, particularly regarding traffic, parking, sewage, and site security. It prioritizes profit over community well-being.
- **2.a Incentive, Property line Setback:** This pushes the building right up against the property line, impeding emergency vehicle access and creating serious fire and evacuation safety hazards.
- **2.b Incentive (100% Non-Residential Use Reduction):** This incentive is being misused to justify inadequate parking provisions in a zone supposedly intended for reliance on public transportation. It favors higher rents for a select few over the creation of more low-income housing that would require less parking, potentially reducing the building height. The sheer size of this development, which might be reasonable on a major thoroughfare, is entirely inappropriate for our small, residential neighborhood. We urgently need more low-income housing, not just high-density developments.
- **2.c Incentive (Car Tire Squeal Mitigation Exemption):** Exempting the developer from the noise mitigation requirements outlined in TNP 4.2.5.C.1 is unacceptable in our predominantly residential neighborhood. The resulting noise pollution will severely disrupt the peace and quiet we currently enjoy.
- **2.d Incentive (Open Space Reduction):** Reducing the already limited open space per LAMC 12.21.G.2 for a development of this size is unconscionable. It contradicts the ordinance's goal of providing residents with opportunities for outdoor recreation and safe play areas. This reduction will force residents to use our streets and sidewalks for recreation, endangering them and further degrading our neighborhood's tranquility, a key aspect of our community that is at risk.
- **2.e Incentive (Reduced Setbacks):** Granting this incentive allows for a dramatically denser development that clashes with Helms and Krammerwood's established character. The reduced setbacks will diminish green space, necessitate the removal of mature trees, and negatively alter sightlines, thereby changing the neighborhood's overall aesthetic.

Inadequate Parking and Traffic Congestion:

The proposed 17 parking spaces are grossly inadequate for a development of this size. To mitigate this, the city must require the lessor to contractually restrict vehicle ownership and street parking for all non-parking lease agreements for the TNP period of 55 years. Additionally, the city must implement overnight parking restrictions and issue overnight parking permits to current residents to protect our limited street parking.

Financial Viability and Long-Term Commitments:

The developer and any successor lessors must contractually agree never to seek economic hardship exemptions, especially those related to low—and very low-income rental relief or the elimination of rent control measures. Their claims of the project's financial viability should be backed by a commitment to maintain its intended affordability and density levels without future modifications, which is currently lacking.

In conclusion, the proposed development at 8931-8945 Helms Place is fundamentally incompatible with the character and capacity of our neighborhood. The requested incentives are being used to maximize profit at the expense of our community's well-being, safety, and quality of life. I urge you to deny these incentives and ensure that any future development in our area respects the existing scale, density, and character of our beloved neighborhood.

Thank you for your time and consideration.
Sincerely,

Carmen Garcia
Homeowner
8932 Helms Place
Los Angeles, CA 90034

Carmen García
Executive Assistant to Jordan Kaplan
Executive Director, Kaplan Foundation and Panzer Foundation

Douglas Emmett Management, LLC
1299 Ocean Avenue, Suite 1000
Santa Monica, CA 90401
(T) 310.255.7721
cgarcia@douglasemmett.com
www.douglasemmett.com

Please respect people who don't deserve it, not as a reflection of their character but as a reflection of yours.

Important Notice: This message is intended only for the person or entity to which it is addressed. The information provided is confidential. Accordingly, any review, retransmission, dissemination or other use of this information by, or disclosure of it to, anyone other than the intended recipient could have significant adverse effects and is prohibited. This message does not constitute an offer to purchase or sell any securities or other interests.



8931-8945 Helms Place | Case CPC-2024-3020-DB-VHCA

Joseph Phelps <joeylphelps@me.com>

Wed, Jan 22, 2025 at 9:08 PM

To: cpc@lacity.org

Dear All,

I strongly oppose the proposed development project CPC-2024-3020-DB-VHCA on Helms Place. This project threatens the unique character and close-knit community that have thrived on our street for generations.

Helms Place is more than just a street; it's a haven within Los Angeles, where multi-generational families reside, children play freely, and neighbors support one another. The proposed development, with its out-of-scale design and focus on single-unit dwellings, disregards our neighborhood's established architectural harmony and family-oriented nature.

This project would:

- **Destroy irreplaceable history:** The development plans include demolishing a property with a tree planted by Holocaust survivors, which symbolizes resilience and hope. Another home slated for demolition represents the original architectural style of our neighborhood.
- **Disrupt community cohesion:** The proposed building's design clashes with the existing neighborhood aesthetic, creating an eyesore and undermining the sense of shared identity we have cultivated.
- **Prioritize profit over people:** The developers have demonstrated a disregard for the community's needs and concerns, offering "affordable" units at exorbitant rents inaccessible to most working-class families.

We are not opposed to development, but it must be responsible and considerate of existing communities. This project, as proposed, prioritizes personal gain over the preservation of our neighborhood's unique character and the well-being of its residents.

We have the support of the SoRo Land Use Committee and the SoRo Council, which recognize this project's detrimental impact. We urge you to join them in rejecting this proposal and protecting the heart of our community.

Thank you for your time and consideration.

Sincerely,

Joey Phelps



8931-8945 Helms Place | Case CPC-2024-3020-DB-VHCA

Kimberly N. Marin <kimna_franco@yahoo.com>
Reply-To: "Kimberly N. Marin" <kimna_franco@yahoo.com>
To: "cpc@lacity.org" <cpc@lacity.org>

Wed, Jan 22, 2025 at 4:40 PM

Hello,

I vehemently oppose the proposed development project CPC-2024-3020-DB-VHCA on Helms Place. This project threatens the unique character and close-knit community that have thrived on our street for generations.

Helms Place is more than just a street; it's a haven within Los Angeles, where multi-generational families reside, children play freely, and neighbors support one another. The proposed development, with its out-of-scale design and focus on single-unit dwellings, disregards our neighborhood's established architectural harmony and family-oriented nature.

I grew up on this street and would ride my bicycle freely up and down the neighborhood with my siblings. All of the neighbors always watched out for each other. To this day we still wave goodbye to each other as we are leaving to work or school. This neighborhood was "safe" to me as a kid. I recently left a highly abusive marriage and brought my three children (ages 9, 6 and 3) to live in my childhood home. I knew that coming to Helms Place was the best for them. I knew for certain that this community would embrace my children just as they have embraced me for so many years. I am terrified that this proposed project will ruin the environment that my children and I ran to as a safe haven. This community means everything to us!

This project would:

- **Destroy irreplaceable history:** The development plans include demolishing a property with a tree planted by Holocaust survivors, which symbolizes resilience and hope. Another home slated for demolition represents the original architectural style of our neighborhood.
- **Disrupt community cohesion:** The proposed building's design clashes with the existing neighborhood aesthetic, creating an eyesore and undermining the sense of shared identity we have cultivated.
- **Prioritize profit over people:** The developers have demonstrated a disregard for the community's needs and concerns, offering "affordable" units at exorbitant rents inaccessible to most working-class families.

We are not opposed to development, but it must be responsible and considerate of existing communities. This project, as proposed, prioritizes personal gain over the preservation of our neighborhood's unique character and the well-being of its residents.

We have the support of the SoRo Land Use Committee and the SoRo Council, which recognize this project's detrimental impact. We urge you to join them in rejecting this proposal and protecting the heart of our community.

Thank you for your time and consideration.

Sincerely,

Kimberly Marin
Homeowner
8926 Helms Place
Los Angeles, CA 90034



8931-8945 Helms Place | Case CPC-2024-3020-DB-VHCA

Mallory Horton <malmalhorton@gmail.com>
To: cpc@lacity.org

Wed, Jan 22, 2025 at 8:33 PM

Dear All,

I strongly oppose the proposed development project CPC-2024-3020-DB-VHCA on Helms Place. This project threatens the unique character and close-knit community that have thrived on our street for generations.

Helms Place is more than just a street; it's a haven within Los Angeles, where multi-generational families reside, children play freely, and neighbors support one another. The proposed development, with its out-of-scale design and focus on single-unit dwellings, disregards our neighborhood's established architectural harmony and family-oriented nature.

This project would:

- **Destroy irreplaceable history:** The development plans include demolishing a property with a tree planted by Holocaust survivors, which symbolizes resilience and hope. Another home slated for demolition represents the original architectural style of our neighborhood.
- **Disrupt community cohesion:** The proposed building's design clashes with the existing neighborhood aesthetic, creating an eyesore and undermining the sense of shared identity we have cultivated.
- **Prioritize profit over people:** The developers have demonstrated a disregard for the community's needs and concerns, offering "affordable" units at exorbitant rents inaccessible to most working-class families.

We are not opposed to development, but it must be responsible and considerate of existing communities. This project, as proposed, prioritizes personal gain over the preservation of our neighborhood's unique character and the well-being of its residents.

We have the support of the SoRo Land Use Committee and the SoRo Council, which recognize this project's detrimental impact. We urge you to join them in rejecting this proposal and protecting the heart of our community.

Thank you for your time and consideration.

Sincerely,

Mallory Horton

As a resident of 8929 Helms PI, next to the planned development at 8931-8945 Helms PI, this development impacts me directly. I will explain why *no developer incentives* should be granted.

- Our single family neighborhood has 32 single-family houses, about 75 people †. The development of 78 units adds 160 people, by the "family" definition (2-3 people) stated by the developer, thus swamping the neighborhood population, destroying its character.
 - Units of 400-500 sq ft are not "family" size, barely adequate for two. If children are packed into studios and singles, the population will soar and the children will suffer.
 - The **2.a** incentive of 75% increase in FAR per Expo TNP section 2.2.1 should not be granted: it creates a super-high density project †† in a small neighborhood without the capacity to support it due to traffic, lack of visitor street parking, a new type of resident (singles are not family), and lack of stated sewage and site security plans.
 - The 2.a incentive enabled rear setback eclipses the sky to the rear of my property, destroying any privacy on our terrace or in our backyard.
 - The same setback pushes the building against the property line, worsening access for emergency vehicles and creating fire and evacuation hazards.
 - The **2.b** incentive of 100% reduction in non-residential use is an excuse, per TNP 2.2.3, to provide parking in a Expo TNP zone that is *expected to solely use public transportation* and should not be granted. It's a lessor-incentive to charge higher rents to a select few. The parking garage footage should be used to create more low income housing not requiring cars, lowering the project height by one story. The 2.b incentive recognizes that a development this big—nominally reasonable for a main thoroughfare—is wrong for a small neighborhood.
 - The **2.c** incentive deletes the TNP 4.2.5.C.1 car tire squeal parking garage mitigation requirement for a neighborhood that is purely residential and should not be granted. The lack will disturb the quiet and sleep of residents on Helms and Cattaraugus.
 - The **2.d** incentive, decreasing the open space required by LAMC 12.21.G.2, reduces the open space for 78 to 160 residents to increase an already overpacked development. 2.d violates the humanitarian spirit of ordinance LAMC 12.21.G to "afford occupants of multiple residential dwelling units opportunities for outdoor living and recreation; provide safer play areas for children as an alternative to the surrounding streets, parking areas, and alleys ... [f]or purposes of [§ 12.21.G.2], usable open space shall mean an area which is designed and intended to be used for active or passive recreation." As the ordinance itself predicts, 2.d will force recreation to spill out at street level, ruining the quiet neighborhood and endangering residents.
 - The **2.e** incentive TNP 4.2.1.A. allows radical reduction of setbacks, creating a super high density development to increase lessor profits and should not be granted.
 - It violates the spirit of the Helms and Krammerwood setbacks, reducing green space, forcing removal of established trees, and changing sight lines.
 - The combination of height and extraordinary setbacks:
 - Eclipses sunlight from noon through sunset to the buildings to the east. Our west facing orchid greenhouse window becomes useless.
 - Makes it impossible for me to justify our planned solar panels.
- 17 parking spaces allocated for 160 people is adequate *only* if the city requires the lessor to agree that all non-parking lease agreements restrict vehicle ownership and street parking for the TNP period of 55 years. Overnight parking restriction and Issuance of overnight parking permits for current residents needs to be required by the city to enforce the rule.
- The Developer *and successor lessors*, pledging that their rental plans are adequate to ensure the economic viability of this super high density development, should contactually agree to *never* ask the city for economic hardship exemptions—especially for low and very low-income rental relief or the elimination of rental price requirements for these incentives.

† The apartment is on Cattaraugus, empties there, and has adequate gated parking.

†† In the footprint of three single-family homes of 3 to 5 people each, for a total of 15, it packs 10 times as many people (~160). This is super-high density for any small neighborhood.

- The tree on the middle lot was planted by a holocaust survivor. He lived in the house where it is sited. Granting the off-menu setback exception kills this tree *and* its significant history.
- What development would work in this neighborhood if the 8931-45 Helms development is inappropriate for a neighborhood by being too high, lacking all setbacks, packing 2x the number of people into three residential lots than live in 32 others lots, *and* completely reframing the aesthetics of a quiet cul de sac neighborhood?
 - Other developments can act as a guide, and you don't need to walk far from Helms to find one: the recent *Ana Lane* Development at 3300-09 National Blvd. It doesn't overwhelm the single family remodeled home to its right. Its design, which includes what looks like wood siding (which incidentally matches the shingles of the building to the right) and stucco is both modern but not overly so. At 2½ stories, each lot provides room for five family apartments, with parking.
 - One can imagine an **Expo TNP** version of this with only one garage per lot, the other garages broken into two singles or four studios making 9 residences per lot. Designated as low income units, each lot could qualify for some less neighborhood-damaging incentives.
 - A better version with *four* townhouses, instead of five, and a neighborhood-standard setback could still qualify and be a better fit for the neighborhood. Even doing one lot this way would save the tree cited above and vastly improve the acceptability of the development to the neighborhood.

Submitted by Robert S. Blum, 8929 Helms PI, Los Angeles, CA 90034



(no subject)

SARA FRANCO <sara.franco71@yahoo.com.mx>

Wed, Jan 22, 2025 at 9:57 PM

To: cpc@lacity.org

Dear All

I strongly oppose the proposed development project CPC-2024-3020-DB-VHCA on Helms Place. This project threatens the unique character and close-knit community that have thrived on our street for generations.

Helms Place is more than just a street; it's a haven within Los Angeles, where multi-generational families reside, children play freely, and neighbors support one another. The proposed development, with its out-of-scale design and focus on single-unit dwellings, disregards our neighborhood's established architectural harmony and family-oriented nature.

This project would:

- **Destroy irreplaceable history:** The development plans include demolishing a property with a tree planted by Holocaust survivors, which symbolizes resilience and hope. Another home slated for demolition represents the original architectural style of our neighborhood.
- **Disrupt community cohesion:** The proposed building's design clashes with the existing neighborhood aesthetic, creating an eyesore and undermining the sense of shared identity we have cultivated.
- **Prioritize profit over people:** The developers have demonstrated a disregard for the community's needs and concerns, offering "affordable" units at exorbitant rents inaccessible to most working-class families.

We are not opposed to development, but it must be responsible and considerate of existing communities. This project, as proposed, prioritizes personal gain over the preservation of our neighborhood's unique character and the well-being of its residents.

We have the support of the SoRo Land Use Committee and the SoRo Council, which recognize this project's detrimental impact. We urge you to join them in rejecting this proposal and protecting the heart of our community.

Thank you for your time and consideration.

Sincerely,

Sara Franco



CULVER CITY HOUSING

Zoey Preza <zoeypreza07@gmail.com>
To: cpc@lacity.org

Wed, Jan 22, 2025 at 9:16 PM

Dear All,

I strongly oppose the proposed development project CPC-2024-3020-DB-VHCA on Helms Place. This project threatens the unique character and close-knit community that have thrived on our street for generations.

Helms Place is more than just a street; it's a haven within Los Angeles, where multi-generational families reside, children play freely, and neighbors support one another. The proposed development, with its out-of-scale design and focus on single-unit dwellings, disregards our neighborhood's established architectural harmony and family-oriented nature.

This project would:

- **Destroy irreplaceable history:** The development plans include demolishing a property with a tree planted by Holocaust survivors, which symbolizes resilience and hope. Another home slated for demolition represents the original architectural style of our neighborhood.
- **Disrupt community cohesion:** The proposed building's design clashes with the existing neighborhood aesthetic, creating an eyesore and undermining the sense of shared identity we have cultivated.
- **Prioritize profit over people:** The developers have demonstrated a disregard for the community's needs and concerns, offering "affordable" units at exorbitant rents inaccessible to most working-class families.

We are not opposed to development, but it must be responsible and considerate of existing communities. This project, as proposed, prioritizes personal gain over the preservation of our neighborhood's unique character and the well-being of its residents.

We have the support of the SoRo Land Use Committee and the SoRo Council, which recognize this project's detrimental impact. We urge you to join them in rejecting this proposal and protecting the heart of our community.

Thank you for your time and consideration.

Sincerely,



CURREN D. PRICE, Jr.

Los Angeles City Planning Commission
200 North Spring Street
Los Angeles, CA 90012-2601

Re: DIR-2023-5190-TOC-HCA-1A

Dear Honorable Commissioners of the Los Angeles City Planning Commission:

I write regarding two projects located at 3851-3855 South Grand Avenue approved by the Director of Planning within my District that are proposed to be developed on the same block by the same developer using the same architect. One project is before your Commission on appeal, the other project is located less than 350 feet away and is currently on appeal to the PLUM Committee of the City Council. While I am strongly supportive of housing projects in my District, these largely market rate projects raise unique concerns that deserve further CEQA review before moving forward.

By way of background, even though these two projects were proposed, by the same developer, using the same architect, and located on the same block, the City Planning Department processed the projects separately and approved the projects without properly analyzing their cumulative environmental impacts. These projects are located in the immediate vicinity of important assets to the Council District 9 community, the Los Angeles Memorial Coliseum and Los Angeles Football Club's (LAFC) BMO Stadium signs. These signs raise visibility for Exposition Park, provide important public service announcements, and will be used for the World Cup and the upcoming 2028 Olympics. Both USC and LAFC have filed appeals related to these projects. I'm concerned that by piecemealing the processing and environmental review of these potentially related projects, the City does not yet have a full understanding of the environmental impacts as required by CEQA, and that an EIR is needed.

Importantly, the projects as currently proposed appear to adversely impact views of the Memorial Coliseum sign from the I-110 Freeway. Although there are no formal city records of the Memorial Coliseum sign being a contributing Historic Resource, its historic value to our city can not be overlooked. The Memorial Coliseum sign was built for the 1984 Olympics, known as the "Freeway Olympics", and the visibility of the sign from the I-110 Freeway is an important part of its history. For the last forty years, the iconic sign has welcomed drivers into downtown and served as a memorial to the Olympic Games. Approving these two projects without analyzing

their cumulative environmental impacts on an iconic fixture in Council District 9 is inconsistent with what CEQA requires.

In addition, there are a number of other impacts to the surrounding community from these projects that haven't been fully considered including noise impacts associated with both construction and operation, transportation-related impacts, including hazardous conditions to drivers on the freeway, and increased air quality impacts and cancer risks that could result from constructing multiple buildings on the same block adjacent to the freeway simultaneously. I am concerned that the lack of public disclosure of potential environmental impacts has deprived the public of the ability to fully participate in the City's decision-making process. Accordingly, I am requesting that the City take the critical step to prepare an EIR that will fully analyze the impacts from both projects so that the community and City decisionmakers can understand their cumulative environmental impacts.

Respectfully,

A handwritten signature in black ink, reading "Curren D. Price, Jr." in a cursive script.

CURREN D. PRICE, JR.

Councilmember, 9th District

FIRM / AFFILIATE OFFICES

Austin	Milan
Beijing	Munich
Boston	New York
Brussels	Orange County
Century City	Paris
Chicago	Riyadh
Dubai	San Diego
Düsseldorf	San Francisco
Frankfurt	Seoul
Hamburg	Silicon Valley
Hong Kong	Singapore
Houston	Tel Aviv
London	Tokyo
Los Angeles	Washington, D.C.
Madrid	

January 22, 2025

VIA EMAIL

Los Angeles City Planning Commission
Los Angeles City Hall
200 North Spring Street
Los Angeles, CA 90012-2601

Re: CPC Meeting 1/23/2025 Agenda Item 9:
LAFC Response to City Planning Appeal Recommendation Report (Case No. DIR-2023-5190-TOC-HCA-1A)

Dear President Lawshe and Honorable Commissioners:

We write on behalf of our client, the Los Angeles Football Club (“LAFC”), regarding a letter submitted by the California Housing Defense Fund (“CalHDF”) concerning LAFC’s appeal of the proposed development project at 3851 South Grand Avenue (Case No. DIR-2023-5190-TOC-HCA) (the “Project”). The letter claims that the City Planning Commission is compelled to approve the Project pursuant to the Housing Accountability Act (“HAA”) and that the City may exempt the Project from review under the California Environmental Quality Act (“CEQA”) by relying upon a Class 32 exemption. CalHDF’s letter misrepresents the City’s obligations under the HAA and ignores the significant CEQA issues raised in LAFC’s appeal and prior correspondence. To be clear, nothing in the law mandates that the Commission approve the Project or exempt it from CEQA. Instead, and as further explained below, the Commission should grant LAFC’s appeal and require the preparation of an Environmental Impact Report (“EIR”) to comply with CEQA.

As an initial matter, ***the HAA does not relieve the City of its obligations under CEQA.*** (Cal. Gov. § 65589.5(e) [noting that the HAA does not relieve a local agency from complying with CEQA].) CEQA requires a fulsome environmental analysis of discretionary actions, including approval of entitlements like those sought by the Project. (Cal. Pub. Res. § 21080.) As noted in LAFC’s appeal and prior correspondence, the analysis underpinning the Project’s Class 32 exemption from CEQA is seriously flawed. ***The Project could significantly impact a historic resource, the Coliseum Sign, by blocking significant views of the iconic sign. As a result of that alone, the City cannot use a Class 32 exemption to approve the Project.*** There also are significant deficiencies in the Project’s air quality, noise, and transportation analyses, which also make the Project ineligible for a Class 32 exemption. Additionally, the City failed to properly analyze the Project’s cumulative impacts in conjunction with the much larger related project proposed by the same development team just feet away from the Project site on the same block. Because the Project’s Class 32 exemption does not comply with CEQA, further environmental analysis is required before the Commission can render a final determination on the Project’s entitlements.

CalHDF misrepresents the City’s obligations under the HAA by insinuating that the City must approve the Project in spite of the numerous flaws in its CEQA analysis described above. To the

contrary, ***the HAA in no way relieves the City of its obligations to complete the review required by CEQA.*** More specifically, the HAA states that it does not “relieve a local agency from ... complying with the California Environmental Quality Act.” (Cal. Gov. § 65589.5(e).)

Further, CalHDF states that “the City may not reject the [Project] except based on health and safety standards,” but fails to address the evidence in the City’s record identifying the Project’s specific, adverse impacts to public health and safety. (CalHDF letter, p. 1.) As discussed in detail in LAFC’s appeal and related submittals, the Project would result in significant noise and air quality impacts and the Project’s proximity to the freeway poses serious dangers to the health of future residents and the safety of freeway drivers. Because the City has not yet completed the required CEQA analysis, the Project’s potential health and safety hazards have not been fully disclosed. The significance of these potential impacts to health and public safety cannot be ignored. Only after the City has complied with its CEQA obligations can the City determine whether the Project meets the HAA standards that CalHDF cites. Thus, ***the HAA does not compel approval of the Project because additional CEQA analysis is required before the City can make an informed determination pursuant to the HAA.***

Finally, CalHDF’s contention that the City faces judicial challenge if it refuses to grant the requested CEQA exemption is entirely misplaced. The City must follow CEQA and properly analyze the Project’s impacts. CalHDF cites to *Hilltop Group, Inc. v. County of San Diego* (2024) 99 Cal.App.5th 890 to argue that the City should use a CEQA exemption and suggests legal liability for the City if the exemption is not used. However, that case involves a completely separate area of CEQA law and was decided on wholly unrelated facts that cannot be applied to the Project.¹ The case is simply not relevant to the issues before the Commission.

While LAFC supports CalHDF’s goal of encouraging housing development in the City of Los Angeles, the City is obligated to follow the law. The HAA does not compel the City to approve the Project, as CalHDF suggests, and the City must complete the environmental review required by CEQA before any entitlements can be issued in furtherance of the Project. LAFC respectfully requests that the Planning Commission grant its appeal and instruct the Planning Department to undertake the proper review of the Project, including completing a comprehensive EIR that analyzes the impacts of the Project and related project together as mandated by CEQA.

Very truly yours,



Duncan Joseph Moore
of LATHAM & WATKINS LLP

¹ *Hilltop* evaluates the application of CEQA Guidelines Section 15183 and not a Class 32 categorical exemption. Under Section 15183, a project that is consistent with the density described in an approved land use plan with a certified programmatic EIR may tier off of that previously-prepared analysis. Here, the Project is seeking a Class 32 exemption and does not purport to rely on previously completed analysis contained in a certified programmatic EIR.



January 22, 2025

Danalynn Dominguez, City Planner
danalynn.dominguez@lacity.org
(213) 978-1340

Dear City Planning Commission,

We are writing to you in support of the proposed 181-unit development, including 20 affordable units, at 4579 West Hollywood Boulevard (4601 – 4627 West Hollywood Boulevard; 4571 – 4579 West Hollywood Boulevard; 1561 North Lyman Place), case number DIR-2023-2838-TOC-SPP-SPR HCA-1A. We urge the commission to reject the appeal, find the project exempt from CEQA, and approve it with the requested Density Bonus and incentives.

The greater Los Angeles region is facing a severe housing shortage, particularly affordable housing. This project will help provide that much needed housing by replacing a commercial building and a parking lot. Abundant Housing LA believes that these housing challenges can only be addressed if everyone in the region does their part.

This project is in a great location for housing, with bus stops and a Metro B Line station 1-2 blocks away, as well as close to grocery stores, restaurants, and Barnsdall Art Park. The project is also close to large medical employment centers, Children's Hospital Los Angeles and Hollywood Presbyterian Medical Center.

This project is a good project for Los Angeles and for the region. Again, we urge the commission to reject the appeal, find the project exempt from CEQA, and approve it with the requested Density Bonus and incentives.

Best Regards,

Azeen Khanmalek

Azeen Khanmalek
AHLA Executive Director

Jaime Del Rio

Jaime Del Rio
AHLA Organizer Director

Tami Kagan-Abrams

Tami Kagan-Abrams
AHLA Project Director

P: (626) 314-3821
F: (626) 389-5414
E: info@mitchtsailaw.com



139 South Hudson Avenue
Suite 200
Pasadena, California 91101

VIA E-MAIL

January 23, 2025

Los Angeles City Planning Commission
Van Nuys City Hall
Council Chamber, 2nd Floor
14410 Sylvan Street
Van Nuys, CA 91401
Em: cpc@lacity.org

RE: City of Los Angeles City Planning Commission – Appeal Hearing for 4627 W. Hollywood Blvd. Project (DIR-2023-2838-TOC-SPP-SPR-HCA & ENV-2023-2839-EAF) (Agenda Item #10).

Dear Honorable Commissioners,

On behalf of the Western States Regional Council of Carpenters (“**Western Carpenters**” or “**WSRCC**”), my Office is submitting these comments for the City of Los Angeles’s (“**City**”) January 23rd, 2024, City Planning Commission appeal hearing, for the 4627 W. Hollywood Blvd. project (“**Project**”). The Western Carpenters is a labor union representing almost 90,000 union carpenters in 12 states, including California, and has a strong interest in well-ordered land use planning and in addressing the environmental impacts of development projects.

Categorical exemptions are not absolute. Even if a project fits into a categorical exemption class, the agency must consider whether a codified exception to exemption applies. Guidelines § 15300.2. A project falling within a categorical exemption may still require environmental review if the project is subject to exceptions-to-the-exemptions listed under CEQA Guidelines § 15300.2. Here, the Project qualifies for these exceptions, as outlined below.

Here, the Project requests numerous departures from the ordinary limits permitted by the General Plan and zoning designations, including but not limited to a significant density increase, a 28% floor area ratio increase, a 13-foot height increase, and an open space reduction.

Given that the Project is located in the Vermont-Western Specific Plan area, a determination that it is compliant with the Specific Plan is necessary to ensure plan consistency. Instead of providing any details about what the SNAP Specific Plan zoning limitations are, the Project applicant admits that the site is zoned C2-1D – i.e., is significantly limited in height – and yet claims that SNAP supersedes such limitation. (Applicant’s Justifications and Proposed Findings, p. 1.) Yet, there is no legal authority cited or showing that the SNAP indeed *supersedes* such “D” limitations.¹ To the opposite, the ZIMAS report for the Project site shows that the site is still subject to the injunction as against the Hollywood Community Plan Update.² (*See* ZIMAS Parcel Report.)

¹ See, Department of City Planning, Generalized Summary of Zoning Regulations, Updated March 2020, p. 9: “D Development Limitation - Restricts heights, floor area ratio, lot coverage, building setbacks”; available at: https://planning.lacity.org/odocument/eacdb225-a16b-4ce6-bc94-c915408c2b04/Zoning_Code_Summary.pdf

² See ZI2433 Injunction, available at: <http://zimas.lacity.org/documents/zoneinfo/ZI2433.pdf>

The City must disclose what is the implication of the C2-1D zoning, what are the limitations and requirements without the Project, and then also disclose what increase does the Project seek, before it concludes that the Project is consistent with the applicable zoning designation and regulations.

Further, the Applicant mentions that the Project “will be” consistent with the applicable Hollywood Community Plan (i.e., part of the General plan’s Land Use Element) and Specific Plan. This statement is misleading and illusory. The Class 32 exemption requires *present* consistency with the applicable plans – not some future consistency. The issue is critical, since at the moment the Project’s applicable Hollywood Community Plan is the one with an injunction over removal of D limitations, as noted earlier. And, while the City is proposing a Hollywood Community Plan Update, it is not yet final or immune to CEQA challenges to become a basis for a consistency finding.

Additionally, CEQA exemptions are reserved for projects without potential to have significant environmental effects. See *Salmon Protection & Watershed Network v. County of Marin* (2004) 125 Cal.App.4th 1098, 1107 [“If a project may have a significant effect on the environment, CEQA review must occur”]. The Project at hand has the potential to cause a number of significant environmental effects.

The very nature of the Project– in the busy Los Feliz area and along arterial Hollywood Blvd. – creates a reasonable foreseeability that the Project may have significant traffic, air quality, and noise issues stemming from the dramatic increase in density and intensity of the land uses on the Project site. Coupled with the fact that the construction of the Project will involve road closures, street detours, and loud construction equipment – and the Project’s siting across from residentially zoned areas – the Project has the potential to cause significant traffic, air quality, and noise impacts, as well as affect human beings. Further, these impacts may be more significant since the Project seeks to demolish the existing structure on the site and further plans to export a total of 39,000 cubic yards.

The Project, along with these and other nearby projects, may collectively contribute to potentially significant cumulative impacts on air quality, noise, and traffic congestion in the neighborhood. For this reason too, the Class 32 CEQA exemption is not applicable.

Pursuant to CEQA Guidelines section 15300.2(c), the Project may also not qualify for a categorical exemption, including Class 32, if it may have impacts due to unusual circumstances. Such circumstances are present here. The Project proposes a massive and intensive mixed-use development on the busy arterial Hollywood Blvd., extending an entire block and across from residential areas. Moreover, it proposes 7 stories above grade and 2 levels below grade on unstable soils mapped in the liquefaction area and in Fire District 1. Based on the Project’s ZIMAS report, while the Project is not in the earthquake zone, it is manifestly within close proximity to such.

In accordance with the above, WSRCC requests that the City require a local and trained workforce, impose training requirements for the project’s construction activities to prevent community spread of COVID-19 and other infectious diseases. Further, the City should grant the appeal, determine that the Project is not exempt from CEQA, and require the preparation of an EIR for the Project. Should the City have any questions, please feel free to reach out to our office.

Sincerely,



Grace Holbrook

Attorneys for Western States Regional Council of Carpenters