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

SECONDARY SUBMISSIONS



Department of City Planning

City Hall, 200 N. Spring Street, Room 272, Los Angeles, CA 90012

June 18, 2025

TO: City Planning Commission

FROM: Gabriela Juárez, AICP, City Planner

TECHNICAL MODIFICATION/CORRECTION TO THE STAFF RECOMMENDATION REPORT FOR CASE NO. CPC-2025-2903-GPA

Transmitted herewith is a revised Exhibit D that replaces the Federal Emergency Management Agency's letter of pending approval, dated August 5, 2024, with the final approval letter, dated September 26, 2024. This to be considered at the City Planning Commission meeting of June 26, 2025, related to Item No. 15 on the meeting agenda.

EXHIBIT D:

FEMA Approval Letter dated September 26, 2024

CPC-2025-2903-GPA, ENV-2025-2904-CE

For consideration by the City Planning Commission

June 26, 2025



U.S. Department of Homeland Security
FEMA Region 9
1111 Broadway, Suite 1200
Oakland, CA 94607

FEMA

September 26, 2024

Jon Brown
Division Chief of Planning and Resilience
City of Los Angeles Emergency Management Department
500 E. Temple St.
Los Angeles, CA 90012

Dear Jon Brown:

The *2024 City of Los Angeles Local Hazard Mitigation Plan* was officially adopted by the City of Los Angeles and submitted for final review and approval to the Federal Emergency Management Agency (FEMA). The review is complete, and FEMA finds the plan to be in conformance with the Code of Federal Regulations, Title 44, Part 201, Section 6 (44 C.F.R. 201.6).

This plan approval ensures the City of Los Angeles' continued eligibility for funding under FEMA's Hazard Mitigation Assistance programs, including the Hazard Mitigation Grant Program (HMGP), the Building Resilient Infrastructure and Communities program (BRIC), Rehabilitation of High Hazard Potential Dams (HHPD) program, and the Flood Mitigation Assistance (FMA) program. All requests for funding are evaluated individually according to eligibility and other program requirements. Approved hazard mitigation plans may also be eligible for points under the National Flood Insurance Program's Community Rating System (CRS).

FEMA's approval is for a period of five years, effective the date FEMA received the first adoption documentation. For this plan, documentation was received on September 24, 2024 and is considered approved as of then. Prior to **September 24, 2029**, the City of Los Angeles must review, revise, and submit their plan to FEMA for approval to maintain eligibility for grant funding. The enclosed plan review tool provides additional recommendations to incorporate into future plan updates.

If you have any questions regarding the planning or review processes, please contact the FEMA Region 9 Hazard Mitigation Planning Team at fema-r9-mitigation-planning@fema.dhs.gov.

Sincerely,

**KATHRYN J
LIPIECKI**

Kathryn Lipiecki
Director, Mitigation Division
FEMA Region 9

 Digitally signed by KATHRYN J
LIPIECKI
Date: 2024.09.26 16:24:46 -07'00'



Jun 23, 2025

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

**Re: Proposed Housing Development Project at 21241-21243 West Ventura Boulevard;
CPC-2023-6206-DB-SPP-SPR-HCA**

To: cpc@lacity.org

Cc: Adrineh Melkonian, City Planning Associate, adrineh.melkonian@lacity.org; City Clerk's Office, clerk.cps@lacity.org; City Attorney's Office, cityatty.help@lacity.org

Dear Los Angeles City Planning Commission,

The California Housing Defense Fund ("CalHDF") submits this letter to remind the Commission of its obligation to abide by all relevant state laws when evaluating the proposed 126-unit housing development project at 21241-21243 West Ventura Boulevard, which includes 7 very low-income units. These laws include the Housing Accountability Act ("HAA"), the Density Bonus Law ("DBL"), and California Environmental Quality Act ("CEQA") guidelines.

The HAA provides the project legal protections. It requires approval of zoning and general plan compliant housing development projects unless findings can be made regarding specific, objective, written health and safety hazards. (Gov. Code, § 65589.5, subd. (j).) The HAA also bars cities from imposing conditions on the approval of such projects that would render the project infeasible or reduce the project's density unless, again, such written findings are made. (*Ibid.*) As a development with at least two-thirds of its area devoted to residential uses, the project falls within the HAA's ambit, and it complies with local zoning code and the City's general plan. Increased density, concessions, and waivers that a project is entitled to under the DBL (Gov. Code, § 65915) do not render the project noncompliant with the zoning code or general plan, for purposes of the HAA (Gov. Code, § 65589.5, subd. (j)(3)). The HAA's protections therefore apply, and the City may not reject the project except based on health and safety standards, as outlined above. Furthermore, if the City rejects the project or impairs its feasibility, it must conduct "a thorough analysis of the economic, social, and environmental effects of the action." (*Id.* at subd. (b).)

2201 Broadway, PH1, Oakland, CA 94612
www.calhdf.org

CalHDF also writes to emphasize that the DBL offers the proposed development certain protections. The City must respect these protections. In addition to granting the increase in residential units allowed by the DBL, the City must not deny the project the proposed waivers and concessions with respect to side yards, rear yard, incremental stepback, height, building to building separation, and open space. If the City wishes to deny requested waivers, Government Code section 65915, subdivision (e)(1) requires findings that the waivers would have a specific, adverse impact upon health or safety, and for which there is no feasible method to satisfactorily mitigate or avoid the specific adverse impact. If the City wishes to deny requested concessions, Government Code section 65915, subdivision (d)(1) requires findings that the concessions would not result in identifiable and actual cost reductions, that the concessions would have a specific, adverse impact on public health or safety, or that the concessions are contrary to state or federal law. The City, if it makes any such findings, bears the burden of proof. (Gov. Code, § 65915, subd. (d)(4).) Additionally, the California Court of Appeal has ruled that when an applicant has requested one or more waivers and/or concessions pursuant to the DBL, the City “may not apply any development standard that would physically preclude construction of that project as designed, even if the building includes ‘amenities’ beyond the bare minimum of building components.” (*Bankers Hill 150 v. City of San Diego* (2022) 74 Cal.App.5th 755, 775.)

Furthermore, the project is exempt from state environmental review under the Class 32 CEQA categorical exemption (In-Fill Development Projects) pursuant to section 15332 of the CEQA Guidelines, as the project is consistent with the applicable general plan designation and all applicable general plan policies as well as the applicable zoning designation and regulations; the proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses; the project site has no value as habitat for endangered, rare, or threatened species; approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality; and the site can be adequately served by all required utilities and public services. Caselaw from the California Court of Appeal affirms that local governments err, and may be sued, when they improperly refuse to grant a project a CEQA exemption or streamlined CEQA review to which it is entitled. (*Hilltop Group, Inc. v. County of San Diego* (2024) 99 Cal.App.5th 890, 911.)

As you are well aware, California remains in the throes of a statewide crisis-level housing shortage. New housing such as this is a public benefit: by providing affordable housing, it will mitigate the state’s homelessness crisis; it will increase the city’s tax base; it will bring new customers to local businesses; and it will reduce displacement of existing residents by reducing competition for existing housing. It will also help cut down on transportation-related greenhouse gas emissions by providing housing in denser, more urban areas, as opposed to farther-flung regions in the state (and out of state). While no one project will solve the statewide housing crisis, the proposed development is a step in the

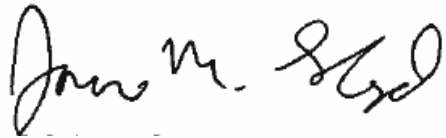
right direction. CalHDF urges the Commission to approve it, consistent with its obligations under state law.

CalHDF is a 501(c)(3) non-profit corporation whose mission includes advocating for increased access to housing for Californians at all income levels, including low-income households. You may learn more about CalHDF at www.calhdf.org.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Dylan Casey', with a long horizontal flourish extending to the right.

Dylan Casey
CalHDF Executive Director

A handwritten signature in black ink, appearing to read 'James M. Lloyd', with a stylized, cursive script.

James M. Lloyd
CalHDF Director of Planning and Investigations

Faramarz “Fred” Yadegar

Trustee of The T.O.Y. Family Trust

1721 S. Flower Street

Los Angeles, CA 90015

Phone: 213-268-5890

Email: sibelle.of.ca@gmail.com

June 12, 2025

Los Angeles City Planning Commission

200 N. Spring Street, Room 763

Los Angeles, CA 90012

Re: CPC-2018-3336-SN-A (Amendment)

Petition to Extend South Park Towers Sign District to 1721 S. Flower Street

Dear Chair and Commissioners,

I write to request that you amend the Supplemental Use Sign District (SN) established under **CPC-2018-3336-SN** for the South Park Towers project by extending its **southern boundary** to include **1721 S. Flower Street (APN 5126-010-008)**. This parcel, though just outside the current block, is functionally and legally tied to South Park Towers—and its exclusion now threatens both visual cohesion and longstanding vested rights.

1. Parcel’s Operating Tie via Recorded Covenant & Judgment

- **8-Space Parking Covenant** (Inst. No. 84-1182551, 10/1/84) grants eight garage spaces at South Park Towers for 1721 S. Flower.
- In **BC492202**, the Superior Court “**declared [the Covenant] to be valid and enforceable...forever**” (Judgment ¶ 1). Successive owners of the Towers site remain bound to honor those spaces.
- As a result, 1721 S. Flower is not independent of the main development—it **must** use the Towers’ podium garage for its Code-required parking.

2. Long-Standing Billboard & Imminent Revenue Harm

- For **30 years**, the owner of 1721 S. Flower has operated a **ground-mounted commercial billboard** on that lot under valid City permits.

- The new South Park Towers SN authorizes **11 large LED off-site signs** within 50–200 feet of 1721 S. Flower. Their brightness and animation will **drown out** the existing billboard, causing immediate loss of advertising revenue and irreparable business harm.
-

3. Sign District Cohesion & Legal Precedent

- **Visual Unity:** LAMC § 12.32 S empowers you to expand an SN when “necessary to preserve or enhance the unified character of a specified area.” Excluding APN 5126-010-008 leaves a regulatory “gap” on a lot whose only right to park, operate, and advertise flows from the Towers project itself.
 - **Binding Easements:** California courts treat off-site parking covenants as real-property easements that “touch and concern” the burdened land. In *Estate of Vardell*, 41 Cal.App.4th 1816 (1996), and *Franklin v. Scottish Co.*, 3 Cal.App.3d 8 (1970), the courts enforced non-contiguous parking easements against successive owners. Those same principles compel unified sign regulation here.
-

4. Requested Amendments

I respectfully ask that you:

1. **Extend the SN boundary** southward from the existing alley to include **APN 5126-010-008** (1721 S. Flower).
 2. Maintain all other sign-area limits, design controls, and Conditions of Approval from CPC-2018-3336-SN.
 3. **Convert** the existing ground-mounted billboard at 1721 S. Flower to a **double-sided LED sign**, consistent in size and illumination standards with the Towers’ new digital signs, to preserve the property’s thirty-year-vested advertising use.
-

5. Conclusion

Including 1721 S. Flower (APN 5126-010-008) in the sign district—and updating its billboard to LED—will:

- Preserve the Court-affirmed parking covenant rights;
- Prevent revenue-destroying visual competition with legacy advertising;

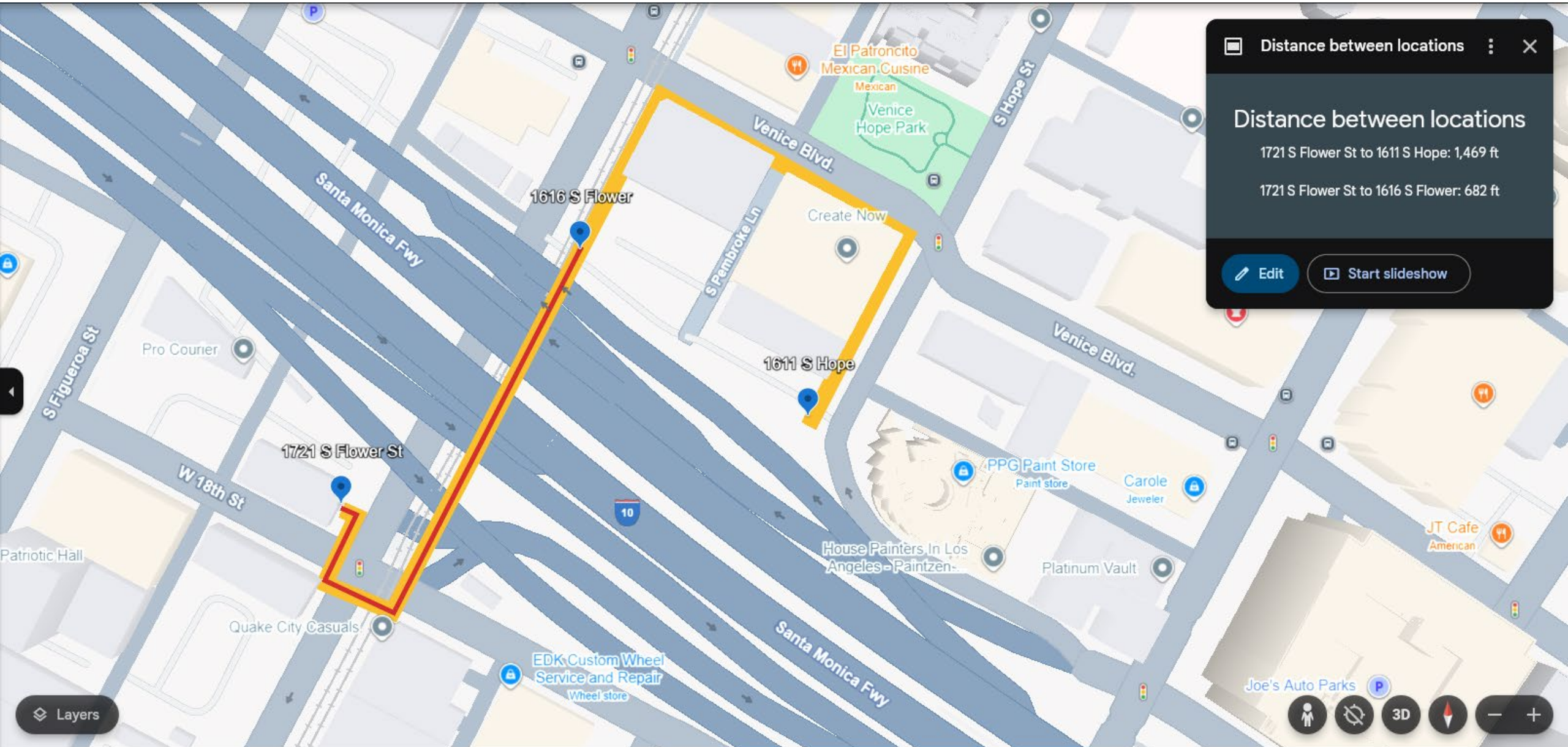
- Promote a cohesive, predictable signage environment across this single, integrated development.

Thank you for your consideration. I am available at **213-268-5890** or sibelle.of.ca@gmail.com to provide any additional information or to participate in the public hearing.

Respectfully submitted,

Faramarz “Fred” Yadegar

Trustee of The T.O.Y. Family Trust



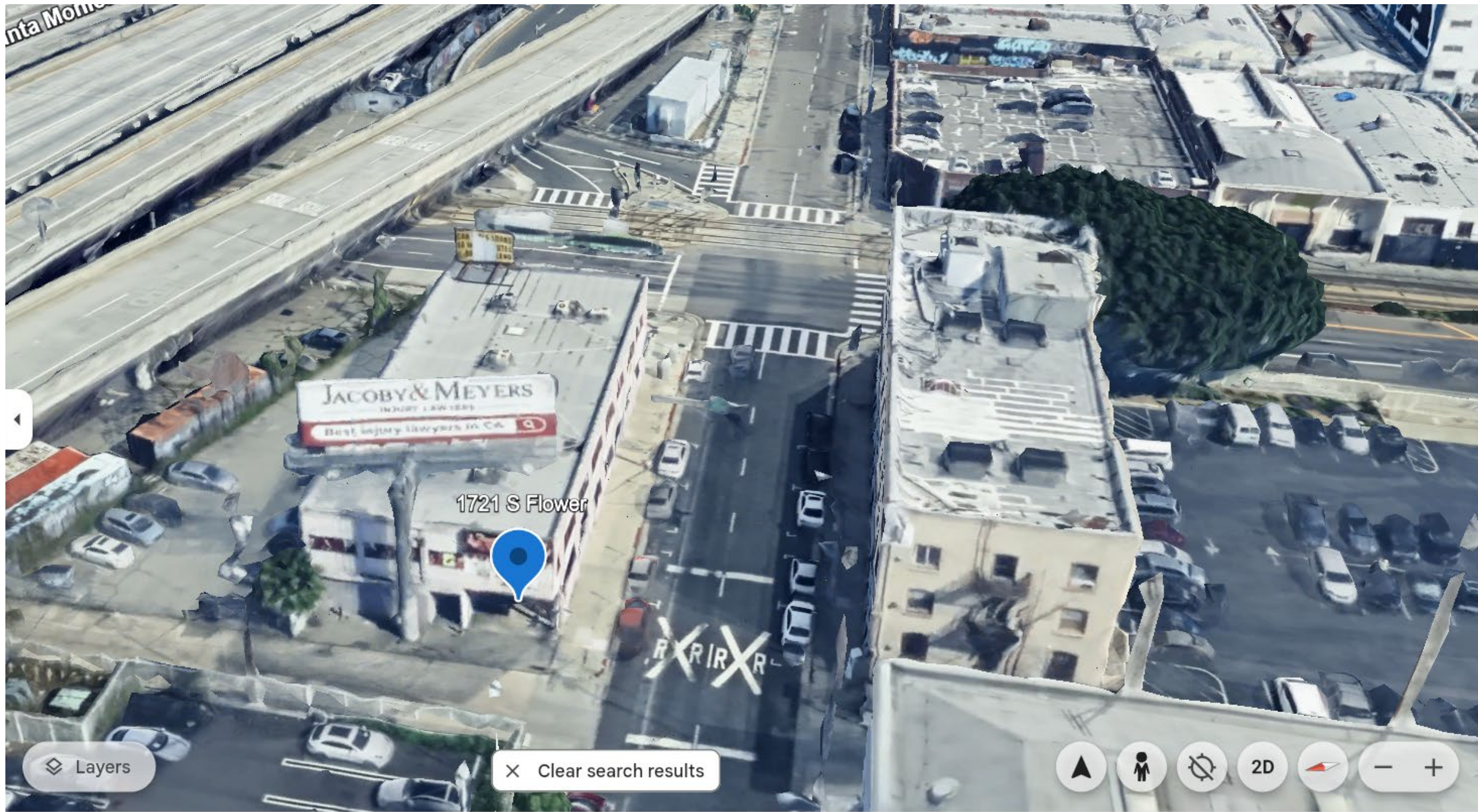
Distance between locations

Distance between locations

1721 S Flower St to 1611 S Hope: 1,469 ft

1721 S Flower St to 1616 S Flower: 682 ft

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JACOBY & MEYERS
INJURY LAWYERS
Best injury lawyers in CA

1721 S Flower

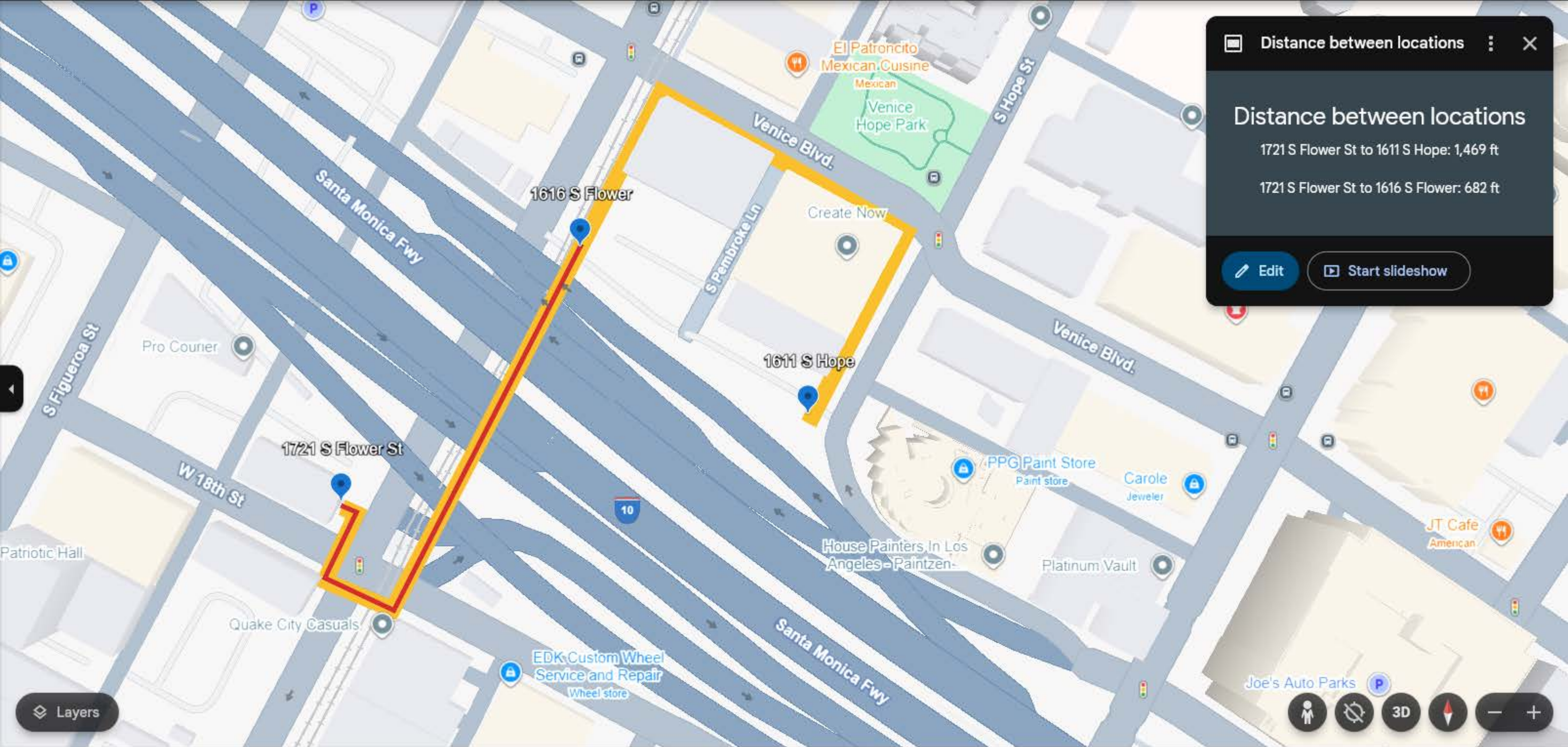


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Distance between locations

Distance between locations

1721 S Flower St to 1611 S Hope: 1,469 ft

1721 S Flower St to 1616 S Flower: 682 ft

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Eva P. Nathanson
715 ½ N. Harper Ave
Los Angeles, CA 90046

Nashya Sadono-Jensen
Los Angeles City Planning
200 N. Spring St., Room 621
Los Angeles, CA 90012
(213) 978-1363
nashya.sadono-jensen@lacity.org
cpc@lacity.org

Katy Yaroslavsky
City Council District 5 Councilwoman
City Hall Office
200 N. Spring Street, Suite 440
Los Angeles, CA 90012
(213) 473-7005
Councilmember.Yaroslavsky@lacity.org

June 4, 2025

Re: Opposition to Proposed Development Project

Concerning Property at:
8251-8271 Melrose Ave. & 705-711 N. Harper Ave, Los Angeles CA 90046

Case Number: CPC-2024-3202-DB-PR-VHCA
Environmental Case Number: ENV-2024-3203-CE
Council District No. 5

Dear Councilmember Yaroslavsky and Members of the Planning Commission,

My name is Eva Nathanson and I am writing to express my deep opposition to the proposed development at 8251 Melrose Avenue.

My family has lived on this property since 1961 and I have owned it since 1988. This is not just my home — it is the foundation of my life in Los Angeles, the place where I raised my children and continue to be actively involved in my community. I am 84 years old, and I am deeply concerned that this development threatens not only the safety and character of our neighborhood, but also my personal health and well-being.

1. A Threat to Neighborhood Character

Over the past 60 years, I've watched this neighborhood evolve — but never at the expense of its soul. The small businesses along this stretch of Melrose, including Harper Salon, Reformation, Carrera Café, and Posh Pet Care, bring life, beauty, and human scale to our community.

Replacing these with a massive commercial development spanning 15,000 square feet and hosting three large tenants would forever change the spirit of the area. It would create something cold, oversized, and out of place — likely catering to corporate chains rather than neighborhood-serving businesses.

This neighborhood is not just a commercial zone. It is home to families, elders, and people like me who have lived here for decades. Our community deserves thoughtful development that enhances, not destroys, its character.

2. Troubling Developer Conduct

The developer, Illulian Group, promotes themselves as “rule breakers” and “disruptors.” This is not what I want in a neighbor. Urban development should be based on transparency, respect, and long-term accountability — not marketing slogans.

The developer has already demonstrated a lack of consideration for neighbors. Trash and delivery trucks as well cars of customers of their current commercial tenants frequently block our shared alley. These seemingly small disruptions have major consequences for someone like me, whose only vehicle access is via that alley.

3. Inadequate and Unrealistic Parking Plans

The proposed project includes 90 residential units and three large commercial spaces — but only 96 parking spots. This is not just insufficient, it’s dangerous. Overflow parking will flood our already congested side streets and alleyways.

The alley behind the property, which I rely on to access my garage, already suffers from frequent illegal parking and commercial obstruction. I fear that this project will create even more congestion and block emergency vehicle access — a frightening prospect for someone my age.

The development also calls for a loading zone across the alley from my vehicle entrance. That would bring in additional trucks, blocking access completely and creating conditions that would make it impossible for an ambulance or emergency personnel to reach my home.

4. Profound Personal and Psychological Impacts

I must speak frankly here. I am a Holocaust survivor. Between the ages of 2 and 4, I was hidden in dark, airless, windowless rooms as my mother and I eluded the Nazis hunting for us Jews. Being deprived of light and air for such a long period during my early childhood left deep emotional scars.

This proposed building — six stories high and directly beside my home — would cast new shadows over my property, depriving it of light and air. Worse still, the prolonged construction and the inevitable dust, noise, and blocked alley access would make me feel trapped once again — echoing those traumas I have spent a lifetime learning to live with.

At this stage in my life, my health and mental well-being are fragile. This project would compromise both. I do not want to live out my remaining years in darkness, anxiety, and fear. No one should have to.

5. A Risky Environmental Situation

I have already lived through the consequences of poorly planned development next door. When the property at 714-718 N. Sweetzer was developed (abutting my property to the west), they hit an underground aquifer during excavation. That mistake caused years of flooding, black mold, and ongoing discharge of water.

My home suffered structural damage, including cracks in the walls and misaligned doors. Despite repeated concerns, no one took responsibility.

The proposed project at 8251 Melrose will involve even deeper excavation, even closer to my home. I am terrified that this will lead to more flooding, more damage, and more risk to my health and property — with no real recourse or accountability.

6. Enforcement Gaps and Ongoing Impacts

I have little confidence that any mitigation measures proposed by the developer will be enforced once the project is approved. It will fall on me and my neighbors to deal with the traffic, noise, and health impacts — just as we have with past projects.

At my age, I cannot keep fighting battles that shouldn't exist in the first place. I am asking you now to intervene before harm is done.

In closing, I ask you from the bottom of my heart: please do not approve this development. Please consider the residents who have lived here, contributed to this neighborhood, and deserve to live in dignity, peace, and safety.

This is my home. Please help me protect it.

Sincerely,

Eva P. Nathanson

Resident of 715 ½ N. Harper Ave, 90046.



Jun 23, 2025

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

Re: Proposed Housing Development Project at 13610 Sherman Way;
CPC-2024-2971-CU3-DB-PR-HCA

To: cpc@lacity.org

Cc: Maren Gamboa, City Planner, maren.gamboa@lacity.org; City Clerk's Office, clerk.cps@lacity.org; City Attorney's Office, cityatty.help@lacity.org

Dear Los Angeles City Planning Commission,

The California Housing Defense Fund ("CalHDF") submits this letter to remind the Commission of its obligation to abide by all relevant state laws when evaluating the proposed 168-unit housing development project at 13610 Sherman Way, which includes 18 very low-income units. These laws include the Housing Accountability Act ("HAA"), the Density Bonus Law ("DBL"), and California Environmental Quality Act ("CEQA") guidelines.

The HAA provides the project legal protections. It requires approval of zoning and general plan compliant housing development projects unless findings can be made regarding specific, objective, written health and safety hazards. (Gov. Code, § 65589.5, subds. (d), (j).) The HAA also bars cities from imposing conditions on the approval of such projects that would render the project infeasible (*id.* at subd. (d)) or reduce the project's density (*id.* at subd. (j)) unless, again, such written findings are made. As a development with at least two-thirds of its area devoted to residential uses, the project falls within the HAA's ambit, and it complies with local zoning code and the City's general plan. Increased density, concessions, and waivers that a project is entitled to under the DBL (Gov. Code, § 65915) do not render the project noncompliant with the zoning code or general plan, for purposes of the HAA (Gov. Code, § 65589.5, subd. (j)(3)). The HAA's protections therefore apply, and the City may not reject the project except based on health and safety standards, as outlined above. Furthermore, if the City rejects the project or impairs its feasibility, it must conduct "a thorough analysis of the economic, social, and environmental effects of the action." (*Id.* at subd. (b).)

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www.calhdf.org

CalHDF also writes to emphasize that the DBL offers the proposed development certain protections. The City must respect these protections. In addition to granting the increase in residential units allowed by the DBL, the City must not deny the project the proposed waivers and concessions with respect to Floor Area Ratio (FAR) averaging, parking access, parking requirements, floor area ratio, height, transition height, side yards, rear yard, and open space. If the City wishes to deny requested waivers, Government Code section 65915, subdivision (e)(1) requires findings that the waivers would have a specific, adverse impact upon health or safety, and for which there is no feasible method to satisfactorily mitigate or avoid the specific adverse impact. If the City wishes to deny requested concessions, Government Code section 65915, subdivision (d)(1) requires findings that the concessions would not result in identifiable and actual cost reductions, that the concessions would have a specific, adverse impact on public health or safety, or that the concessions are contrary to state or federal law. The City, if it makes any such findings, bears the burden of proof. (Gov. Code, § 65915, subd. (d)(4).) Of note, the DBL specifically allows for a reduction in required accessory parking in addition to the allowable waivers and concessions. (*Id.* at subd. (p).) Additionally, the California Court of Appeal has ruled that when an applicant has requested one or more waivers and/or concessions pursuant to the DBL, the City “may not apply any development standard that would physically preclude construction of that project as designed, even if the building includes ‘amenities’ beyond the bare minimum of building components.” (*Bankers Hill 150 v. City of San Diego* (2022) 74 Cal.App.5th 755, 775.)

Furthermore, the project is exempt from state environmental review under the Class 32 CEQA categorical exemption (In-Fill Development Projects) pursuant to section 15332 of the CEQA Guidelines, as the project is consistent with the applicable general plan designation and all applicable general plan policies as well as the applicable zoning designation and regulations; the proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses; the project site has no value as habitat for endangered, rare, or threatened species; approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality; and the site can be adequately served by all required utilities and public services. Caselaw from the California Court of Appeal affirms that local governments err, and may be sued, when they improperly refuse to grant a project a CEQA exemption or streamlined CEQA review to which it is entitled. (*Hilltop Group, Inc. v. County of San Diego* (2024) 99 Cal.App.5th 890, 911.)

As you are well aware, California remains in the throes of a statewide crisis-level housing shortage. New housing such as this is a public benefit: by providing affordable housing, it will mitigate the state’s homelessness crisis; it will increase the city’s tax base; it will bring new customers to local businesses; and it will reduce displacement of existing residents by reducing competition for existing housing. It will also help cut down on transportation-related greenhouse gas emissions by providing housing in denser, more urban areas, as opposed to farther-flung regions in the state (and out of state). While no one

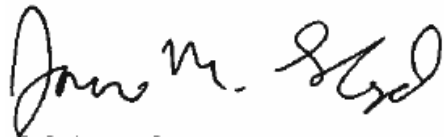
project will solve the statewide housing crisis, the proposed development is a step in the right direction. CalHDF urges the Commission to approve it, consistent with its obligations under state law.

CalHDF is a 501(c)(3) non-profit corporation whose mission includes advocating for increased access to housing for Californians at all income levels, including low-income households. You may learn more about CalHDF at www.calhdf.org.

Sincerely,



Dylan Casey
CalHDF Executive Director



James M. Lloyd
CalHDF Director of Planning and Investigations

Benjamin M. Reznik
bmr@jmbm.com

1900 Avenue of the Stars, 7th Floor
Los Angeles, California 90067-4308
(310) 203-8080 (310) 203-0567 Fax
www.jmbm.com

Ref: 85397-0001

June 23, 2025

BY EMAIL ONLY

President Lawshe
Members of the City Planning Commission
Department of City Planning
City of Los Angeles
200 N. Spring St.
Los Angeles, CA 90012
Attn: Eva Bencomo, Commission Executive Assistant I
Attn: Cecilia Lamas, Commission Executive Assistant II
E-Mail: cpc@lacity.org
eva.m.bencomo@lacity.org
cecilia.lamas@lacity.org

Re: Case Number: DIR-2024-7352-BSA
Response to Appellant's April 22, 2025 Justification to Appeal
Property Address: 23416 S President Ave., Los Angeles
City Planning Commission Hearing Date: June 26, 2025

Dear President Lawshe and Members of the City Planning Commission:

Our office represents Oceans 11 RV Park, LLC ("Oceans 11"), the owner of 23416 S. President Avenue, Los Angeles (the "Site"), and the applicant for ministerial permits to develop a recreational vehicle park ("RV") park as a by-right Public Benefit Project under LAMC Section 14.00A(7) (the "Project"). On June 13, 2025, we submitted a letter on behalf of Oceans 11 to address Concerned Residents of Green Meadows West's ("Appellant") appeal of the Director of Planning's April 9, 2025, Letter of Determination ("LOD").

On June 16, 2025, Appellant submitted a "Letter to CPC" in support of its appeal. Appellant's letter repeats arguments that were fully considered and rejected by both DBS and the Planning Director. The letter also alleges that the onsite conditions do not comply with the performance standards for a Public Benefit Project even though construction is not complete, final inspections have not yet occurred, and the City has not even reactivated the Project's original permit that was issued back in March 2024 and/or issued its supplemental permit that was cleared for approval back in August 2024 and which, according to the City, is forthcoming.

The following serves to supplement our June 13, 2025, correspondence and rebut Appellant's allegations. We reiterate our request that the CPC deny the latest appeal and sustain the LOD.

I. The Special Occupancy Parks Act Does Not Control Local Land Use

Appellant again incorrectly argues that the Special Occupancy Parks Act ("SOPA") requires the applicant to obtain a Conditional Use Permit ("CUP") from the City to permit an RV park. A plain reading of the statute, the legislative context, and the California Department of Housing and Community Development's ("HCD") own guidance materials make clear that Appellant misunderstands the scope and purpose of SOPA.

First, SOPA's core purpose is to protect public health and safety within the parks themselves, not to determine where such parks may be located. That authority belongs squarely to local agencies. Gov. Code § 65800 et seq.

Second, Appellant misreads Health & Safety Code § 18866.2, which states that "Any person may file an application with the governing body of any city, city and county, or county for a conditional use permit for a special occupancy park..." (emphasis added). The term "may" is permissive, not mandatory. The statute does not require a CUP; it merely authorizes an applicant to apply for one if the local jurisdiction's zoning ordinance requires it. The remainder of Section 18866.2 simply outlines the public hearing procedures a local agency will follow if it requires a CUP.

Third, HCD—the state agency tasked with enforcing SOPA—has made clear that zoning and land use determinations are the exclusive domain of local governments. HCD issued an April 21, 2008 Information Bulletin on the "Validity of local ordinances relating to installation of new manufacturer homes and/or sale or conversion of mobilehome parks," which states that "Throughout this memorandum, there are references to "manufactured homes", "mobilehome parks" and "the Mobilehome Parks Act"; however, unless otherwise noted, the same issues and rules apply to recreational vehicles...recreational vehicle parks, and the Special Occupancy Parks Act." <https://www.hcd.ca.gov/sites/default/files/docs/building-standards/ib-2008-10.pdf>. The bulletin then discusses Health and Safety Code section 18300, which lists the scope of local government authority. The statute states in relevant part that state law "shall not prevent local authorities" from enacting zones or establishing types of uses and locations within the jurisdiction where RV parks are allowed. The Bulletin states "subdivision(g) of H&SC section 18300 provides express authority for local governments...to adopt zoning ordinances to allow or prohibit parks and certain park uses..." to establish park density, to require recreational facilities, and "to approve or deny approval for any construction permit to build or increase the size of a park..." It specifies that "with respect to construction of a new or expanded park...HCD regulations require evidence of local approvals from the local planning agency." Exh. A.

HCD's website also makes it clear that local agencies govern the zoning and land use approvals for RV parks whereas HCD oversees health and safety standards for them. For example, HCD's website states that applicants must "[o]btain any necessary local agency approvals and complete all necessary plans, calculations, engineering, etc. required for processing [] application[s]" to permit a special occupancy park.
https://www.hcd.ca.gov/building-standards/permits-and-inspections?utm_source=chatgpt.com.

The HCD website also states that "[a] construction permit is required when developing a new mobilehome park or special occupancy park" and that among the "local government approvals...[that] must accompany all construction project permit applications" is "[w]ritten approval or a conditional use permit from the local planning agency." (emphasis added).
https://www.hcd.ca.gov/manufactured-and-mobilehomes/mobilehome-parks/park-construction-and-alterations?utm_source=chatgpt.com ("The required written approvals may be in letter form issued by the agency having authority to grant such an approval or simply a signature on the affected plans by the approving agency's authorized agent.").

Thus, according to HCD itself, zoning and land use is left to the local agencies. Nothing in SOPA requires that a CUP be obtained, and the City remains fully empowered to determine—through its own zoning code—whether and how to permit an RV park. If the City has deemed the project consistent with its zoning and ministerially approvable under LAMC § 14.00.A.7, no CUP is required. We respectfully request that the Commission reject the appeal on this ground.

II. LAMC Section 12.03 Does Not Modify Section 14.00 For Public Benefit Projects

See our office's June 13, 2025, letter addressing Appellant's erroneous argument that Section 12.03 imposes a CUP requirement for RV parks. Section 14.00.A.7 unquestionably provides a ministerial pathway for permitting an RV park. Appellant admits as much in its June 16, 2025, letter where it states "LAMC § 14.00.A provides that uses which do not meet the performance standards set forth therein require a CUP"—i.e., a CUP is not required if the use meets the performance standards.

III. Profit Motive Does Not Disqualify a Public Benefit Project

See Oceans 11's June 13, 2025, letter explaining that the zoning code does not require that a project be operated by a nonprofit organization in order to qualify for ministerial approval under LAMC Section 14.00.A.7. The Planning Director correctly rejected the contention that a project "for-profit" somehow defeats Public Benefit Project eligibility under Section 14.00 of the LAMC.

IV. DBS And Planning Have Repeatedly Determined That The Project Meets All Twelve Performance Standards

The remainder of Appellant's arguments pertain to Oceans 11's building plans, which have nothing to do with zoning determinations or interpretations. As the Director of Planning

correctly found, “whether a plan checker accurately reviewed and/or corrected project plans, or whether what was constructed matches those plans are not issues appealable to the Zoning Administrator.” Nor are they now appealable to the Commission. Those are issues within DBS’ jurisdiction. Nevertheless, Oceans 11 briefly addresses Appellants’ flawed arguments below.

A. Appellant Alleges That Onsite Conditions Do Not Comply With Performance Standards Nos. 3, 4, 5, 6, And 8 Before The Project Is Even Complete.

Fatal to Appellant’s appeal is its accusations that the onsite conditions of the Property fail to satisfy the performance standards even though construction is not complete, the City still has not reactivated Oceans 11’s permit or issued its supplemental permit, and final inspections have not yet occurred. (*See, e.g.*, Letter to CPC, p. 7 [“As the record shows, a chain-link fence has been installed instead.”]; *id.* [“There is graffiti on the chain link fence that has not been removed.”].) All fencing landscaping¹, and setbacks will be inspected **after** the permit is reinstated/issued and construction is complete. It is only at that point that DBS will verify compliance with the approved plans. Appellants allegations are essentially premature code enforcement complaints. It is impossible to find the Project out of compliance before it is even complete.

What is particularly egregious about the appeal are the allegations that the project violates performance standards relating to the front-yard setback and the landscape buffer. The City required Oceans 11 to submit a supplemental application to address these specific issues and subsequently confirmed compliance. Regarding performance standard no. 4, Appellant admits that Oceans 11’s plans show a 20-foot setback, but argues that “it is clear” that Oceans 11 will instead utilize a 17.67 foot front yard prevailing setback. Not only would that not be a violation considering that the City itself calculated 17.67 feet to be the prevailing setback, but Oceans 11 has already represented numerous times that it will provide a 20-foot front-yard setback. Oceans 11 has also recorded a signed covenant agreeing to indefinitely comply with all the performance standards. Appellant’s suspicion that Oceans 11 might use the prevailing setback instead of a 20-foot setback is unfounded and would not constitute a violation in any event.

Regarding performance standard nos. 5 and 6 requiring a landscape buffer and parking area landscaping, Appellant argues that the records shows utility hookups and other structures in those areas, thereby “negating the ability to provide the required landscaping.” First, the City has already determined that the Project complies with LAMC § 12.21.A.6 by dedicating **more than** the required 4% of the total parking area to landscaping.² Ten existing myrtle trees alone account

¹ Plan Sheet P-2 shows a 10-ft landscaped periphery, which complies with performance standard no. 5. Inspection will occur after installation.

² The LOD’s reasoning on this allegation is instructive: “A note on Plan Sheet No. P-1 shows the calculation of the landscaping requirements. The total parking area is 46,135 square feet. Four percent of that is 1,845.5 square feet. One fourth of the required 4 percent, 461.4 square feet, is credited for street trees; according to the plans approved by City Planning, the project will be maintaining the 10 existing crepe myrtle street trees in satisfaction of this requirement. The

for a quarter of the 4% requirement. In other words, Oceans 11 is providing more landscaping than is even required and Appellant has made no showing that any utility hookups threaten compliance.

Second, Appellant provides no evidence that Oceans 11 is constructing something in those areas that conflict with the required landscaping. The presence of rough-ins for shore power units, for example, does not negate compliance with landscaping requirements. To the contrary, landscaping can be and often is installed around such infrastructure. Appellant's argument rests on an unsupported and incorrect assumption that the presence of utilities necessarily precludes landscaping—an assumption that is contradicted by standard development practices and the plain language of the Code.

Finally, Appellant is again arguing prematurely about onsite conditions before project completion, final inspections, and permits.

B. Oceans 11's Project Complies With Performance Standard No. 9

See our office's June 13, 2025, letter addressing Appellant's allegation. We also note that Appellant's argument that Title 25 parking requirements apply only to mobilehome parks and not RV parks is directly contradicted by HCD's 2008 Bulletin stating that "the same issues and rules apply to recreational vehicle parks" unless otherwise noted. The bulletin then specifies that local government authority over RV parks includes the "adopt[ion of] ordinances, rules, regulations or resolutions prescribing park perimeter walls or enclosures on public street frontage, signs, access, and **vehicle parking**["] (emphasis added).

Accordingly, we end up back at LAMC Section 12.21.A for the regulation of offsite parking, which Appellant agrees does not contain "explicit parking ratios for RV parks." (Letter to CPC dated June 16, 2025.) Appellant does not identify a parking ratio it believes should apply, but simply states that it is error for the City to exempt Oceans 11 from providing offsite parking. That is not, however, what the record shows. The LOD states that Plan Sheet No. 1 shows that "Each rental site has room for parking 1 RV and 1 vehicle." This would indicate that the project includes 46 off-street parking spaces for its 46 recreational vehicle spots. Two ADA (Americans with Disabilities Act) parking stalls are shown at the center rear of the property on Plan Sheet Nos. P-1 and P-3." Thus, **Oceans 11 is providing ample offsite parking**, thereby satisfying performance standard no. 9.

Because the Project meets all the performance standards thereby entitling Oceans 11 to ministerial permits, there is no basis for Appellant to insist that Oceans 11 instead obtain a CUP.

project includes 4,000 square feet of landscaped area in the front, **which exceeds the required 4 percent of landscaped area required**. Other trees are also included and listed as a note on Plan Sheet No. P-1 and in a plant schedule on Plan Sheet No. P-3. Therefore, the plan shows compliance with the required performance standard." (LOD, p. 50 [emphasis added].)

President Lawshe
Members of the City Planning Commission
June 23, 2025
Page 6

V. Conclusion

Appellant's June 16, 2025, "Letter to CPC" offers no new evidence or legal basis to overturn the LOD. The record shows that: (1) no CUP is required for the Project; (2) eligibility as a Public Benefit Project is not based on profit motives; (3) allegations regarding current onsite conditions are premature and unfounded given that the Project is not yet complete, final inspections have not yet occurred, and the applicant is still waiting for the City to reactivate its original permit and/or issue its supplemental permit that is supposedly forthcoming; and (4) the evidence unquestionably shows the Project's compliance with the twelve performance standards.

For the foregoing reasons and those articulated in our office's June 13, 2025, letter, we urge the Commission to deny the appeal and affirm the Director of Planning's LOD in full.

Sincerely,



BENJAMIN M. REZNIK of
Jeffer Mangels Butler & Mitchell LLP

cc: Kristina Kropp, Luna & Glushon (Appellant Representative)



Public Comment - 06/26/2025 - City Planning Commission Mtg (6/18)

Kristopher Eclarino <keclarino@climateresolve.org>

Wed, Jun 18, 2025 at 12:14 PM

To: cpc@lacity.org

Cc: Jonathan Parfrey <jparfrey@climateresolve.org>, Enrique Huerta <ehuerta@climateresolve.org>

Hello,

My name is Kris Eclarino, Senior Technical Manager at Climate Resolve.

I am providing a public comment for this month's City Planning Commission Meeting, under Item 15:

- **15. CPC-2025-2903-GPA**
 - **PROPOSED PROJECT:** Administrative Amendment to the Safety Element of the General Plan to incorporate the most current Local Hazard Mitigation Plan (LHMP).
 - **Applicant:** City of Los Angeles
 - **Staff:** Gabriela Juárez, City Planner (gabriela.juarez@lacity.org)

Public Comment:

"Climate Resolve strongly supports the City Planning Commission's action to amend the Safety Element by incorporating the recently adopted Local Hazard Mitigation Plan. This integration enhances the City's wildfire resilience through critical measures including enhanced defensible space requirements, improved early warning and evacuation systems, infrastructure hardening with fire-resistant building standards, community education programs, and enhanced inter-agency coordination.

Given the most recent wildfires, this proactive approach is essential. Amending the Safety Element allows the City to receive AB2140 eligibility for disaster funding, providing opportunities for the City to secure adequate funding and staffing for implementation of these mitigation strategies."

--

Kristopher Eclarino

Senior Technical Manager | Climate Resolve

Pronouns: he/him/his

(310) 283-9130 (Mobile)

525 S Hewitt St, Los Angeles, CA 90013

climateresolve.org | [@climateresolve](https://twitter.com/climateresolve)



Climate Resolve has been inducted into the International Green Industry Hall of Fame

DAY OF HEARING SUBMISSIONS



KATY YAROSLAVSKY

COUNCILWOMAN, FIFTH DISTRICT

June 25, 2025

City Planning Commission
Re: CPC-2024-3202-DB-PR-VHCA
8251 Melrose Ave. Los Angeles, CA 90046

Dear Commissioners,

I am writing to respectfully request that the following condition be included in the proposed project which ensures careful evaluation of groundwater-related risks prior to construction. For context, this neighborhood has a known high water table. During construction of a nearby development at 728 N. Sweetzer, it is believed that an underground aquifer was disturbed, resulting in long-term negative impacts including recurring street flooding, algae buildup, and possible structural damage in the surrounding area. These issues remain today and continue to affect local residents.

To prevent similar damage, we urge that the project be required to comply with the following condition:

"Prior to the issuance of any building or grading permits, the applicant shall submit a geotechnical report prepared by a registered civil engineer or certified engineering geologist to the written satisfaction of the Department of Building and Safety. The geotechnical report shall assess potential consequences of any shallow groundwater conditions and discuss mitigation measures that may include building design consideration. Building design considerations shall include, but are not limited to: dewatering, groundwater handling, hydrostatic design, selection of appropriate foundation type and depths or any combination of these measures. The project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the proposed project, and as it may be subsequently amended or modified."

This language directly addresses the concerns raised by past incidents and provides a framework for prevention through early study and appropriate design. We believe its inclusion is both prudent and necessary to safeguard our neighborhood and infrastructure. Thank you for your attention and consideration.

Respectfully,

A handwritten signature in black ink that reads "Katy Yaroslavsky". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

KATY YAROSLAVSKY
Councilwoman, Fifth District



Cecilia Lamas <cecilia.lamas@lacity.org>

RE: comments for item 11; 13610 Sherman Way

Tiffany Zeytounian <tiffany.zeytounian@lacity.org>
To: Cecilia Lamas <cecilia.lamas@lacity.org>

Thu, Jun 26, 2025 at 9:49 AM

Hi Cecilia,

Please see my comments below:

Good morning Commissioners,

My name is Tiffany Zeytounian and I am here to speak on behalf of Council District 2 (the Office of Councilmember Adrin Nazarian) regarding the proposed development at [13610 Sherman Way](#). While we support responsible growth and increased housing opportunities, we believe this project must do more to address its impacts on the surrounding neighborhood and meet the expectations of our constituents. I'd like to highlight several key areas where improvements are both necessary and reasonable.

We realize that the property is home to 10 RSO units and tenants who will have a difficult time finding something similar in pricing near the area. We want to ensure that the developer work closely with the tenants to assist them with the first right to return and work to ensure that it does not cause long term displacement.

We do however understand that 18 units will be slated as very low income and that the entire project as a whole will still be subject to the RSO ordinance.

1. Tree Removal and Landscaping

Urban tree canopy is critical for heat mitigation, air quality, and neighborhood character.

- We are requesting that the project plant 2:1 replacement of trees and that the trees be 15 gallon or bigger.
- Additionally, we request that the developer ensure proper establishment and ongoing care of the plantings.

3. Parking and Traffic Impacts

The proposed 99 parking spaces for 168 units could lead to spillover parking in adjacent neighborhoods that are already struggling with congestion.

- We would like to see additional parking spaces included in the project and parking enforcement strategies for the ingress and egress of the entrance of the driveway.

Council District 2 supports housing, but wants to make sure that projects meet environmental standards and do not impact the quality of life for nearby residents. We believe these requests are measured, achievable, and in alignment with City policies promoting sustainable and inclusive development.

We look forward to continued dialogue with the developer and Planning staff. Thank you for your time and consideration.



Adrin Nazarian
Councilmember, Second District

Tiffany Zeytounian
Planning Deputy
200 N. Spring St, Room 435,
Los Angeles, CA 90012
(213) 473-7002 | cd2.lacity.org



TOMORROW's PLANNING COMMISSION MTG: PARKING CHALLENGE - RE CPC-2024-2971-CU3-DB-PR-HCA / CEQA: ENV-2024-2972-CE

Diana Brown <dianala@roadrunner.com>

Wed, Jun 25, 2025 at 3:47 PM

To: maren.gamboa@lacity.org

Cc: cpc@lacity.org

Dear Ms. Gamboa,

I attended the Notice of Public Hearing presented via Zoom on April 22, 2025 concerning the construction of an apartment building @ [13610 Sherman Way](#) – 13618 ½ Sherman Way, 91405.

If I attend tomorrow's meeting via ZOOM, I have a hunch members of the community will be unable to speak of their concerns about this potential approval? *"The ability to provide public comment remotely, an optional participation feature, cannot be guaranteed."*

It appears that, utilizing a state law RE 'Density Bonus' (18 out of 168 will be designated as 'low income') that this provision also includes allowing limits to available parking? **Out of the 168 units, there will be approximately 69 units without accommodation for any parking.**

I expect this plan will be approved, but I want to publicly go on record that providing so few parking spaces will be detrimental to the community at large – that is, unless law enforcement allows tenants to park in the NORMS parking lot. I don't even know how much of the NORM's parking lot will exist after this construction. **Will tenants start using the Ralph's parking lot, given practically NO public parking on Sherman Way?**

There has been at least one individual who lives on Sherman Way who has parked on Gault Street. This is the street just south of Sherman Way where this building will be constructed. We already have a neighbor just east of me who has constructed an ADU on his property, as well as at least 3 to 4 additional 'rooms' deemed 'recreational area'. Some parking is on his property, but not enough to cover all tenants, "or" tenants still prefer to use street parking.

PLEASE, if at all possible, request this applicant, Vigen & Roselyn Haroutunian, Hidden Villas, LLC, to provide additional parking!!!!

Sincerely,

Diana H. Brown

13553 Gault Street

Van Nuys, CA 91405

818-437-3112



13654 Victory Blvd., #136 Valley Glen, California 91401
www.greatervalleyglencouncil.org



RE: CPC-2024-2971-CU3-DB-PR-HCA ENV-2024-2972-CE
13630-13618 ½ Sherman Way 91405

June 5, 2025

TO: Maren Gamboa, City Planner/Hearing Officer
Marin.Gamboa@lacity.org

Dear Hearing Officer Gamboa and City Planning Commission,

While we support the construction of low-income housing on our corridors, we oppose losing this community, which is a special oasis, a little road with many shade trees nestled behind businesses on this very busy boulevard. Approximately low income 15 families would be displaced. Tenants also attended our Planning and Land Use Committee meeting on May 13, 2025, and we share their concern regarding the demolition of their community of rental homes with trees and gardens. As a neighborhood council we want what is best for our neighborhoods and its stakeholders.

A representative of our Planning and Land Use Committee attended the Public Hearing for this case on April 22, 2025 and listened to the concerns of many of these low-income families who rent/occupy the bungalows on this property. These residents, displaced by this construction will have a long wait for right of return to a living situation that would not be comparable, given that these are not apartment dwellers. Children would be displaced from their schools, and the rental market is very difficult to find family-appropriate comparable housing while this project is being built.

Furthermore, we are a very low tree canopy area of the city, and at least 18 mature trees will be removed, including a mature California black walnut, which though not considered protected by the City of Los Angeles, it is still a threatened rare species under CEQA. Furthermore, the applicant is asking to have waived the planting 42 required trees, and would only plant 29, not in the ground but on a second story. This deprives our community of shade.

We are writing of our concern regarding the fate of the tenants, the trees, the environmental loss, and also the density of this project that is crowding 168 units with 99 parking spaces into an awkward configuration with a dog leg entrance to the apartments, which are situated behind a commercial storeroom building that fronts Sherman Way. We have concerns about the ingress/egress on busy Sherman Way. This configuration is not how we would plan our community. We do not want to see the loss of this little respite from the bustle of the busy commercial corridor, nor do we want the congestion this development would produce. This is not an appropriate way to solve the housing crisis, and at our June 2, 2025 regular meeting our Board voted to support this letter.

Sincerely,

DocuSigned by:

Jessica Russell

FA19BB02EDBD405
Jessica Russell, Chair

Greater Valley Glen Neighborhood Council Planning and Land Use Committee

cc: **cc: Tiffany Zeytounian**, CD 2 Planning Deputy; **Denise Scholl**, CD 2 Former Acting Planning Deputy; **Ben Kwok**, CD 2 Field Deputy