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.

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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.

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

SECONDARY SUBMISSIONS

DAY OF HEARING SUBMISSIONS

Sep 24, 2025

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

Re: Proposed Housing Development Project at 8803 – 8807 North Darby Avenue; 18419 1-16 West Gresham Street, CPC-2024-901-DB-VHCA

To: cpc@lacity.org

Cc: correy.kitchens@lacity.org; clerk.cps@lacity.org; cityatty.help@lacity.org;

Dear Los Angeles Planning Commission,

The California Housing Defense Fund ("CalHDF") submits this letter to remind the City of its obligation to abide by all relevant state laws when evaluating the proposed 41-unit housing development project at 8803 – 8807 North Darby Avenue; 18419 1-16 West Gresham Street, which includes 5 very low-income units. These laws include the Housing Accountability Act ("HAA"), the Density Bonus Law ("DBL"), AB 130, 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).)

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 yard, maximum building height, 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. Furthermore, the project is eligible for a statutory exemption from CEQA pursuant to AB 130 (Pub. Res. Code, § 21080.66), which was signed into law on June 30, 2025 and effective immediately (Assembly Bill No. 130, 2025-2026 Regular Session, Sec. 74, available here) 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

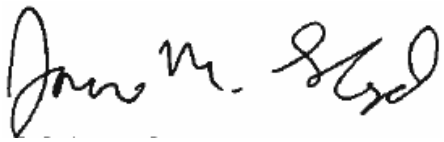
project will solve the statewide housing crisis, the proposed development is a step in the right direction. CalHDF urges the City to approve it, consistent with its obligations under state law.

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

City Planning Commission
Regular Meeting
9/25/25

Secondary Submission
re: CPC-2024_901-DB-VHCA
by Rick Willett and Natara Brown

Members of the Planning Commission,

We appeared (virtually) at the Public Hearing on 7/29/25.

We live in the house north of the project, at 8066 Darby Ave. Our family has owned the property since 1975. Our house borders the scheduled-to-be-demolished parking lot and the rest of the property borders the pool area.

We brought up at the Public Hearing:

> From the plans, it is our understanding that the new building will be even taller than the existing one. This will our solar panels. The existing building already keeps our yard in shade for a significant portion of the day. Applicant agreed that “Yes, the proposed height will create interference of the existing solar panels located on the property to the north of the subject site.” Solar Panels are a capital improvement, and the proposed project therefore reduces the value of the property, as well as increasing our power bills.
>
> Natara works home (mostly on Zoom) and her office windows are adjacent to the parking lot. It’s going to be difficult to guide meditations, lead a DBT group, and see clients with a demolition going on next door.

Additionally:

> We don’t have central air, which means we leave our windows open except on the hottest days. What sort of dust mitigation plan is in place? Natara has asthma bordering on COPD and we are concerned that the construction is going to negatively affect her health.

Please understand that we support the idea that Los Angeles needs more multi-family residential properties, even as homeowners. We have decent public transportation on 2 neighboring streets, which makes this neighborhood an excellent place to build. And, between the impact to a capital improvement, the projected loss of livelihood, and potential health issues, we are concerned about this project.

Correction of information in Public Hearing and Communications on page P-1:

> Speaker #1 was Rick Willett, not Rollett

Thank you for your time and attention.





September 24, 2025

City Planning Commission
Van Nuys City Hall Council Chamber
14410 Sylvan Street, 2nd Floor
Van Nuys, CA 91401
cpc@lacity.org
Via Electronic Mail

Re: Better Neighbors LA Comment Letter – Agenda Item 7: Short-Term Rental Technical Amendment Ordinance - SUPPORT

Dear Planning Commissioners,

Better Neighbors LA supports the proposed ordinance clarifying the longstanding prohibition on short-term rentals ("STRs") as an acceptable use for housing units, a prohibition embedded in the Los Angeles' Zoning Code since at least 1992. Better Neighbors LA is a coalition of tenants, housing activists, and community members working to curb illegal STR activity with the intent to protect long-term housing.[1] We conduct data analysis and research on the STR industry and its impact on affordable housing.

The Home Sharing Ordinance ("HSO"), enacted in 2018, currently governs STR operations in Los Angeles. Prior to this moment, STRs were not a permitted use of a dwelling unit within the zoning code, as the staff report notes, due to the "permissive" nature of the LA Municipal Code—which is to say that only expressly permitted uses of housing units are allowed. The proposed ordinance would underscore and clarify that because STRs are not expressly permitted uses of housing units, they were—and remain—prohibited except as provided for in the Home Sharing Ordinance. Eliminating this ambiguity will ensure that the HSO remains the clear, enforceable, and deciding regulation in the operation of STRs in the City and will make enforcement of the HSO easier by clearing up problematic and factually incorrect interpretations of existing law occasioned by the decision in *People v. Venice Suites*—putting all STR operators on a level playing field.

[1] https://www.betterneighborsla.org/

Protecting housing stock for long-term residents is critical as the city continues to face a housing affordability and homelessness crisis. Per the staff report, STR operators are already trying to undermine our existing Home-Sharing Ordinance, claiming exemptions from existing STR regulations to create competitive advantages for themselves. Allowing operators to circumvent regulations through inaccurate interpretations of existing law risks weakening the central pillars of HSO enforcement, undermining the City's attempts to create comprehensive regulation on this sector. Passing this ordinance would ensure clarity for regulators and hosts in the market.

Better Neighbors LA urges the commission to adopt the Technical Amendment Ordinance, which will strengthen enforcement by closing loopholes and reaffirming the City's regulatory intent. By clarifying that STRs were never a permitted use outside the HSO, this amendment reinforces the city's commitment to preserving housing for long-term residents. Should you have any questions, please contact Maura O'Neill at maura@betterneighborsla.org.

Sincerely,

/s/ Randy Renick

Planning CPC <cpc@lacity.org>

Short-Term Rental Technical Amendment Ordinance (CF14-1635-S13) - Opposed

George Francisco <policy@venicechamber.net> Wed, Sep 24, 2025 at 12:48 PM
To: cpc@lacity.org

RE: Short-Term Rental Technical Amendment Ordinance (**CF14-1635-S13**) - Opposed

Dear Commission President Lawshe:

The Venice Chamber of Commerce, established in 1907, is the longest-standing business and community organization in Venice, California. We proudly represent more than 350 members, most of them small to medium-sized, locally owned enterprises and we are united in our commitment to preserving Venice's reputation as one of Los Angeles' major tourist destinations.

We must respectfully but firmly oppose Council File 14-1635-S13.

This ordinance would terminate long-established, legally vested property rights of small, independent hospitality providers across Los Angeles, particularly in Venice and Hollywood. The City presents the measure as a "technical correction," but in reality, it directly conflicts with California court precedent, which raises serious constitutional concerns regarding separation of powers and due process.

The passage of this ordinance would eliminate approximately half of all short term rentals in Venice, including nearly all of those along Ocean Front Walk. Similar impacts would be felt in Hollywood, DTLA and other tourist districts. These are not large corporate chains; they are family-owned businesses that have served visitors for generations.

By reducing visitor accommodations, the ordinance would also damage our wider ecosystem of small businesses like coffee shops, bars, restaurants, retail stores, and cultural venues whose livelihood and survival depends on tourist spending. The City has provided no economic impact analysis to determine the loss of jobs and tax revenue, nor has it conducted outreach to affected businesses despite the scope of these consequences.

Los Angeles is preparing to host the FIFA World Cup in 2026 and the Olympic Games in 2028, events that will bring an unprecedented influx of international tourism. This is not the time to reduce accommodations or place additional burdens on small businesses still working to recover from the pandemic. We respectfully urge the City of Los Angeles to support, not diminish, our hospitality sector by rejecting CF 14-1635-S13 and by working collaboratively with stakeholders to craft balanced policies that protect neighborhood stability while sustaining economic vitality.

Thank you for your consideration.

George Francisco
Director of Policy & Planning
Venice Chamber of Commerce
--

Planning CPC <cpc@lacity.org>

RE: Short-Term Rental Technical Amendment Ordinance (CF14-1635-S13) - Opposed

George Francisco <policy@venicechamber.net> Wed, Sep 24, 2025 at 10:47 AM
To: cpc@lacity.org
Cc: Ted Green <ted@greenpaac.com>

Dear Commission President Lawshe:

The Westside Council of Chambers of Commerce (WC3) is comprised of twelve Chambers of Commerce on the westside of Los Angeles County – the Beverly Hills Chamber of Commerce, Century City Chamber of Commerce, Culver City Chamber of Commerce, Hollywood Chamber of Commerce, LAX Coastal Chamber of Commerce, Los Angeles Area Chamber of Commerce, Los Angeles LGBTQ Chamber of Commerce, Malibu/Pacific Palisades Chamber of Commerce, Santa Monica Chamber of Commerce, Venice Chamber of Commerce, West Hollywood Chamber of Commerce and the West Los Angeles Chamber of Commerce.

We must respectfully oppose CF-1635-S13.

As proposed, this ordinance will have a negative effect in our city and terminate vested property rights of small, locally owned hotels in older neighborhoods in Los Angeles, and the proposed “technical amendments” to the Los Angeles Zoning and Municipal codes would render many hotels’ operations illegal under the City of Los Angeles’ Home Sharing Ordinance. The city has done absolutely no outreach, made no effort to alert affected business owners or to even identify affected businesses, even though these businesses operate in some of most highly touristed parts of Los Angeles. Worse, the city has done no analysis of the economic impact this draft ordinance will have. Additionally, we are concerned that it will adversely impact the entire surrounding tourist economy, eliminating demand for small coffee shops, bars, restaurants, retail stores, and other tourism-accommodating businesses.

At a time when small businesses are reeling back from the pandemic and the City is in the midst of preparing for a huge influx of tourists for LA26 and LA28, now is not the time to introduce an ordinance such as this that will have an adversely impact on small, local businesses, and local jobs.
Please feel free to follow-up with our Legislative Consultant, Ted Green, at (310) 659-9450 or ted@greenpaac.com.

Sincerely,

George Francisco
Chair, Westside Council of Chambers of Commerce (WC3)

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WC3 Letter to the City Planning Commission in Opposition to CF14-1635-S13 (002).pdf
141K

WC3
Westside Council of Chambers of Commerce

September 22, 2025

President Monique Lawshe
Los Angeles City Planning Commission
City of Los Angeles
Van Nuys City Hall
14410 Sylvan Street
Van Nuys, CA 91401

VIA EMAIL: cpc@lacity.org

RE: Short-Term Rental Technical Amendment Ordinance (**CF14-1635-S13**) - Opposed

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Sincerely,



George Francisco
Chair, Westside Council of Chambers of Commerce (WC3)