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SECONDARY SUBMISSIONS

Edward E. Diskin
EED Investments, LLC
11054 Ventura Blvd., Suite 188
Studio City, CA 91604
November 11, 2025

Via Email: APCSouthValley@lacity.org and via Fedex next day morning delivery.

To:

Vanessa Barraza, President, and Members of the South Valley Area Planning Commission
City of Los Angeles
200 N. Spring Street
Los Angeles, CA 90012

Re: Case No. TT-84517-CC-1A — 13530 Moorpark Street

Hearing Date: November 13, 2025 (Agenda Item No. 5)

Subject: Applicant's Submission in Support of Appeal — Request for Parking Modification/
Adjustment Based on Physical and Historical Constraints

Dear President Barraza and Members of the Commission,

I am the owner of EED Investments, LLC ("EED"), the applicant in the above-referenced case and the owner of the property located at **13530 W. Moorpark Street** (the "Property"). This letter is submitted on behalf of EED in support of the appeal filed by **Mr. Seth Shamon**, a tenant residing in one of the six (6) units on the Property.

I am 81 years old and purchased this building nearly 20 years ago as part of our long-term plan for financial stability in later years. In **May 2024**, we applied to convert this long-standing six-unit apartment building into condominiums. After a lengthy review process, the City approved the project in **September 2025**, but unexpectedly included a condition requiring **two parking spaces per dwelling unit**—a total of twelve (12) spaces—when only **eight (8)** legally established spaces exist.

1. Historical Context and Existing Conditions

The Property was originally constructed and issued a Certificate of Occupancy in **1964**, under the zoning and building regulations in effect at that time.

City records confirm that the structure was legally built with **six (6) parking spaces**, which fully satisfied the parking requirements under then-current **LAMC Section 12.21.A.4**.

In **2010**, two additional parking spaces were added by reconfiguring the west side of the building, slightly reducing the interior of the three-bedroom unit. This modification—approved

by the City—brought the total to **eight (8)** functional spaces, which is the current and verified condition.

2. Physical Impossibility to Provide Additional Parking

According to site data and engineering analysis, the lot measures approximately **7,500 square feet**, nearly fully occupied by the building footprint, narrow rear driveway, and required setbacks. The building directly abuts the side property lines, and the rear yard already meets only the minimum depth allowed by code.

There is **no physical or safe way** to add four more parking spaces without demolishing part of the building, violating required setbacks, or compromising ingress/egress safety standards. The site's geometry and existing structural layout make compliance with twelve (12) spaces **physically impossible**.

3. Applicable Code and Grandfathering Provisions

Under LAMC 12.21.A.4(a) and related provisions of the **Condominium Conversion Ordinance (Ordinance No. 180,608)**, the City has historically permitted existing legal nonconforming parking counts to remain when a structure:

1. Was lawfully constructed prior to adoption of newer parking requirements; and
2. Cannot feasibly comply without major structural alteration or demolition.

The **Department of Building and Safety (LADBS)** has repeatedly recognized that requiring full compliance in such cases would be *"unreasonable and impractical"*, particularly for small, pre-existing multifamily lots.

4. Precedent for Similar Approvals

Comparable condominium conversions and parking adjustments have been approved under similar circumstances in Sherman Oaks and nearby Studio City, including:

- **13418 Moorpark Street (TT-67452-CN)** – Six-unit conversion (2014) approved with eight existing spaces retained.
- **14120 Moorpark Street (AA-2009-2735-PMLA-CN)** – Four units approved with six existing spaces, though zoning called for eight.
- **4607 Ventura Canyon Avenue (AA-2013-0654-CN)** – Approved conversion retaining 1.3 spaces per unit due to site constraints.

- **ZA-2008-3863-ZV** – Variance granted allowing reduced parking (1 space per unit) for physical limitation and lack of available land.

These examples show consistent **City precedent** for recognizing site constraints and preserving legal, nonconforming parking conditions in older multifamily structures.

5. Conclusion and Request

The Property at **13530 Moorpark Street** fully complies with the *intent* of the parking code by providing safe and reasonable off-street parking within its physical limitations.

Given:

- Its lawful construction and approval in **1964**;
- The **2010** improvement adding two additional spaces; and
- The **physical impossibility** of creating more without demolition;

We respectfully request that the Commission **approve the conversion with the existing eight (8) parking spaces recognized as conforming**, consistent with established City precedent, fairness, and the principles of vested property rights.

Thank you for your time and thoughtful consideration.

Respectfully submitted,



Edward E. Diskin

On behalf of EED Investments, LLC
Owner, 13530 W. Moorpark Street

November 5, 2025

Vanessa Barraza, President
and Members of the
South Valley Area Planning Commission
City of Los Angeles
200 N. Spring St.
Los Angeles, CA 90012
E-Mail: APCSouthValley@lacity.org

Re: Case No. TT-84517-CC-1A
13530 Moorpark Street
Hearing Date: November 13, 2025 (Agenda Item No. 5)
Applicant's Submission in Support of the Appeal

Dear President Barraza and Members of the South Valley Area Planning Commission:

This office represents EED Investments, LLC ("EED"), the applicant in the above-referenced case and the owner of the subject property located at 13530 W. Moorpark Street (the "Property"). This letter is submitted on behalf of EED in support of the appeal filed by Seth Shamon (the "Tenant"), who is a tenant in one of the six (6) units on the Property.

The Tenant appeals the decision of the Deputy Advisory Agency dated September 5, 2025 (the "Decision") relative to Condition No. 13(a) only, which provides as follows:

13. Prior to the recordation of the final map, the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a manner satisfactory to the Planning Department, binding the subdivider and all successors to the following:
 - a. Provide a minimum of 2 covered off-street parking spaces per dwelling unit.

As stated in the appeal, Condition No. 13(a) directly harms the Tenant because it would preclude the Tenant's "ability to purchase his one-bedroom home at a fair price." More specifically, the Property is developed with six (6) dwelling units and eight (8) legally established off-street parking spaces, and it is physically impossible to create any additional off-street parking spaces on the Property. Therefore, the only way to comply with Condition No. 13(a) would be to consolidate existing dwelling units in a way that would result in the loss of at least two dwelling units—which is contrary to the City's housing goals and directly undermines the Deputy Advisory Agency's finding that "[n]o units would be eliminated in order to satisfy Municipal Code parking requirements." (Decision, p. 22.)

Shortly after the Decision was issued, EED raised this issue with City Planning staff and was informed that the language of Condition No. 13(a) requiring two parking spaces per unit was an error. For this reason, and because staff was amenable to issuing a Notice of Correction relative to Condition No. 13(a), EED did not appeal the Decision. However, we understand that staff was unable to issue a Notice of Correction once the Tenant's appeal was filed.

We have reviewed the City Planning Department's Recommendation Report ("Staff Report") in this matter and we concur with its reasoning and strongly support staff's recommendation to modify Condition No. 13(a) as set forth in the Staff Report. In addition to the points made in the Staff Report, granting the Tenant's appeal and modifying Condition No. 13(a) is warranted for the following reasons:

- It is undisputed that EED has a legal nonconforming right to maintain the existing six dwelling units with eight off-street parking spaces as reflected in the permit records for the Property. Requiring EED to abandon this legal nonconforming right as a condition of converting the units to condominiums would be unfair and would serve no valid public purpose.
- The proposed condominium conversion would provide public benefits by upgrading the City's housing stock, increasing the property tax base, and facilitating homeownership opportunities for existing tenants.
- The proposed conversion of six existing dwelling units to condominium ownership will not adversely affect the rental housing market in the area or individual tenants. Prior to the sale of any unit, each tenant will be given the exclusive right to contract for the purchase of the unit occupied by that tenant upon the same or more favorable terms and conditions than those on which such unit will be initially offered to the general public, as

Vanessa Barraza, President
November 5, 2025
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required by LAMC section 12.95.2.E.3. Furthermore, if a tenant elects not to exercise their right to purchase their unit, relocation assistance will be provided as required by LAMC sections 12.95.2.G and 47.06.

For these reasons, and for the reasons discussed in the Tenant's appeal and in the Staff Report, EED requests that the South Valley Area Planning Commission grant the appeal and modify Condition No. 13(a) as recommended in the Staff Report.

Thank you for your consideration.

Very truly yours,



JOHN M. BOWMAN
Elkins Kalt Weintraub Reuben Gartside LLP

JMB:JMB

cc: Joanna Marroquin, Planning Assistant (via email)

DAY OF HEARING SUBMISSIONS