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

P.O. Box 27404
Los Angeles, CA 90027
www.hillsidefederation.org

HILLSIDE FEDERATION

Central Area Planning Commission
Undine Petrulis

via email

February 18, 2026

Re: Appeal No. DIR-2025-1000-BSA-1A SUPPORT
2669 Bronholly Drive

Dear Commissioners:

The Hillside Federation represents 46 resident and homeowner associations across the Santa Monica Mountains. We are deeply focused on the preservation of the wild lands that make these communities special, as well as the health and safety of our neighborhoods. As such, we are disturbed by the project approvals for the development proposed at 2669 N. Bronholly Drive, which we urge you to overturn. We write in strong support of the appeal before you.

We would like to draw your attention to two primary issues: the integrity of the Oaks "D" Limitations, and the urgency of ensuring proper compliance with the City of LA's Protected Tree Ordinance. In both cases, this project has the potential to set dangerous precedents that could foster additional unchecked development – thus defeating the purpose of these regulations.

The Oaks "D" Limitations were the product of a robust, City Planning-led process, and should be seen as a shining example of community-based planning. How, then, to explain a five-story home 65 feet high instead of the 39 feet maximum under the D Limitations, connected by tunnel to an attached garage, on a sub-standard lot next to protected parkland, just a stone's throw from the 4,000-acre-plus wilderness of Griffith Park? We are particularly concerned about Building & Safety's lack of legal authority to dismiss the tunnel as a non-connecting feature of the residence.

In some ways, the protected tree issues are even more egregious. It is clear from experts – including the Santa Monica Mountains Conservancy – that the developer has submitted (and the City of Los Angeles has accepted) a deeply deficient protected tree report. How can Urban Forestry and Building & Safety accept a report that fails to even acknowledge the project's massive grading, due to required street-widening, beneath a protected toyon tree? The City of Los Angeles must not allow developers to simply claim that they will ensure the safety of protected trees when the evidence clearly indicates otherwise, as is the case here.

The precedents set by this project, if it is allowed to proceed, would be dangerous to hillside development protections throughout Los Angeles. If projects such as this one are allowed to move forward, even in neighborhoods like the Oaks that have their own development standards, what can we expect in other hillside communities that are not similarly protected?

Once again, we urge you to over-turn the project approvals and ensure proper compliance with all appropriate standards. Please find in favor of the appeal before you.

Sincerely,

Charley Mims

cc: Mashael Majid, Deputy Chief of Staff, Planning, Housing & Community Development for Councilmember Nithya Raman
Andrea Conant, Chief of Staff, Councilmember Nithya Raman

Case #: DIR-2025-1000-BSA-1A

Neighbor Petition in Support of Appeal

June 2, 2025

Re: 2669 Bronholly Dr.

Case #: DIR-2025-1000-BSA

Zoning Administrator Tim Fargo

c/o Undine Petrulis, undine.petrulis@lacity.org

Dear Mr. Fargo,

We are writing to thank you, first of all, for your thoughtful handling of the May 7th hearing. As you pointed out, the issues in this case are complicated, and not simply a matter of builder vs. neighbors. We appreciate your intention to take your time examining the core issues, and to render a decision that is both in line with the relevant standards and a basis for everyone to understand how the Oaks D Limitations will be interpreted moving forward.

In this letter, we would like to set forth three points, which will be described further below:

1. Our focus is, and always has been, compliance with rules & regulations.
2. We believe the intent of the D Limitations is clear – as is the legal standard.
3. This project, as designed, would violate those standards and set a troubling precedent.

<u>We oppose this project – not all hillside construction</u>

As mentioned during the hearing, a previous project at this site encountered no opposition from neighbors. While none of us reviewed detailed plans for that project, it was our general understanding that it met all relevant standards – including the D Limitations, Baseline Hillside Ordinance and other LA City regulations.

When the current owner bought the property, he decided to build something larger and taller that would cover more of the lot. In order to circumvent the regulations, his team looked for workarounds, exemptions and other gimmicks. The current project does not align with either the intent or the requirements of the Oaks D Limitations. As such, we oppose it.

<u>The D Limitations are clear: balance development rights with neighborhood standards</u>

The story of the D Limitations is community-based planning at its best. Neighborhood leaders asked for an ordinance to maintain the unique character of the Oaks and prevent out-of-scale development. City Planning staff analyzed existing home and lot sizes, and created formulas for new construction based on that data.

As described by City Planning staff, the rationale for the regulations was clear:

> This proposed ordinance is a measure to reasonably limit construction through floor area, height and lot coverage regulations, which may minimize grading and the building footprint. These criteria may also reduce the likelihood of soil erosion, deforestation and depletion of plant and animal life.[1]

The D Limitations allow for reasonable development while curtailing practices that have plagued other parts of Los Angeles. Every District 4 Councilmember from Tom LaBonge to Nithya Raman has supported this ordinance, as has the City Planning Commission. The Oaks D Limitations represent a major policy-making victory, and must be upheld as intended.

<u>This project will destroy local standards – here and throughout the neighborhood</u>

Construction of this house would require excavating the majority of a small, steep hillside. The fact that dirt will later be used to cover up much of this excavation does nothing to change that. Native vegetation, drainage patterns and wildlife habitat will all be disturbed. These outcomes are not at all what the D Limitations envisioned – particularly for such a small, steep site. In fact, the initial City Planning staff report specifically cites vacant, steep, substandard lots:

> There is a need to develop specially tailored land use tools to integrate new development on these lots into the existing community - the proposed "D" Development Limitations address these issues. The impacts of gradual, inappropriate development in this kind of terrain constitute a threat to the health, safety and welfare of the community due to soil erosion and excessive grading, loss of permeable surfaces, and the depletion of plant and animal habitat.[2]

In our view, the LA Department of Building & Safety analysis of this project is deeply flawed – and would lead directly to the negative impacts cited above. In determining that the garage is "detached," even though it is physically connected by a tunnel, LADBS admits that it has considered only the visual impacts of the finished project. Yet this decision leads to a 65-foot-high structure that exceeds the Oaks D standard by more than 25 feet. Simply hiding the connection with clever engineering does nothing to change that. As further detailed both at the hearing and in written correspondence, the LADBS decision does not pass legal muster.

While height may be the most egregious failure of this project, it is by no means the only one. There are also problems with residential square footage, lot coverage and more. Any one of these issues would force a redesign of the project – which we urge you to require.

---

[1] https://clkrep.lacity.org/onlinedocs/2010/10-0291_RPT_CPC_02-17-10.pdf, page 24 of 107.
[2] Same reference.

Conclusion: Please uphold appropriate standards for development

Again, we are not opposed to all construction. We simply believe that any project at this site must adhere to local regulations, as properly interpreted from both a legal and policy-making standard. We are not alone in these views. You've heard from local leaders such as Gerry Hans and Bob Young, both of whom were personally involved in the creation of Oaks D Limitations, with the latter writing on behalf of the Oaks Neighborhood Association.

Consider, too, this warning from City Planning staff:

> However, without protection, The Oaks will continue to be susceptible to inappropriate vacant lot infill development. … The enactment of the proposed "D" Development Limitations is necessary to … protect the neighborhood from unwanted negative environmental effects associated with excessive building patterns.[3]

In our view, LADBS has failed to interpret the D Limitations properly, and the result would be great harm to our community. We ask your assistance in ensuring that the D Limitations are faithfully upheld as the reasonable neighborhood standard they were always meant to be.

Sincerely,

Jason Greenwald 5871 Carolus Drive	Corey Nickerson 5871 Carolus Drive	Judith Burnett 5875 Carolus Drive
William Doyle 5875 Carolus Drive	Ryan Reeves 2647 Canyon Drive	Lana Branover 2663 Bronholly Drive
Lenny Branover 2663 Bronholly Drive	Gordon Gooch 2659 Bronholly Drive	Claire Gooch 2659 Bronholly Drive
Arich Berghammer 2842 Lambert Drive	Gera Berghammer 2842 Lambert Drive	Rick Walker 2646 Bronholly Drive
Daniel Rosenwald 2662 Bronholly Drive	Ari Reisbaum 2662 Bronholly Drive	Shannon Reeves 2647 Canyon Drive

[names continue …]

[3] https://clkrep.lacity.org/onlinedocs/2010/10-0291_RPT_CPC_02-17-10.pdf, page 31 of 107

[… continued from previous page]

Karlyn Hawke
2646 Bronholly Drive

Ron Deutsch
2843 Lambert Drive

Christine Scoolis
2843 Lambert Drive

Monica Morgenthal
2622 Bronholly Drive

Scott Crichlow
2622 Bronholly Drive

Kathryn Korniloff
5875 Carolus Drive

cc: Mashael Majid, deputy chief of staff, Councilmember Nithya Raman

Sheri L. Bonstelle
sbonstelle@jmbm.com

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

February 19, 2026

Central Los Angeles Area Planning
Commission
200 N. Spring Street
Los Angeles, CA 90012
apccentral@lacity.org

Re: 2669 North Bronholly Drive (DIR-2025-1000-BSA)
Hearing: Tuesday, February 24, 2026 4:30pm Item No. 5

Dear ZA Fargo:

We represent Gaspar Obando, V & G Development LLC, (the "Owner") the owner of the property at 2669 North Bronholly Drive, Los Angeles (the "Property"). The Owner did not receive written or electronic notice of this hearing as required by the LAMC and the Brown Act. The Owner was only notified yesterday by the Central LA APC staff, when the agenda was issued. Therefore, in order to comply with the APC's response timelines, we have no time to prepare an updated letter. This letter addresses the appeal issues, and was originally provided for the Zoning Administrator hearing on the matter. Some of these claims were at issue in the ZA hearing and may not be in the appeal to APC.

We request that the Central LA APC deny the appeal and support the determination of the Department of Building and Safety ("LADBS") in their issuance of building permits for the project. The project includes a 1,571 square foot three-story single family residence with a basement, a detached garage, a detached accessory building, one retaining wall, and site grading (the "Project"). The Owner originally filed for ministerial building permits for the residence ten years ago, and has responded to relentless demands from a group of neighbors who seek stop the construction of any single family home on the Property. None of their claims has any merit, and were refuted in detail in the Report by Osama Younan, General Manager, LADBS, dated February 5, 2025 (DBS-240096-DCP) (the "City Report"), which determined that the City did not err or abuse its discretion in issuing the permits for the Project.

A city's interpretation of the building code is entitled to significant deference in light of the city's expertise regarding land-use determinations. *Harrington v. City of Davis,* (2017) 16 Cal. App. 5th 420. The California Supreme Court explained that the degree of deference accorded an agency's interpretation is . . .not susceptible of precise formulation, but lies somewhere along a continuum, . . . or, in other words, is "*situational.*" *Yamaha Corp. of America v. State Bd.*

Of Equalization (1998) 19 Cal.4th1, 7, 12. Greater deference should be given to an agency's interpretation where "the agency has expertise and technical knowledge, especially where the legal text to be interpreted is technical, obscure, complex, open-ended, or entwined with issues of fact, policy, and discretion." *Yamaha* at 12. Greater deference is also appropriate where there are "indications of careful consideration by senior agency officials." *Yamaha* at 13. The City's construction of the building code is entitled to significant deference. (*City of Monterey v. Carmshimba*, 215 Cal.App.4th, 1091) A court must find that the City's construction of the building code is "clearly erroneous or unauthorized" to overturn it (*Anderson First Coalition v. City of Anderson*, (2005) 130 Cal.App.4th 1173, 1193). The court has also held that "the more specific provision ... takes precedence over the more general one" (*Salazar v. Eastin* (1995) 9 Cal.4th 836, 857). Under substantial evidence review, a City's consistency findings are presumed to be supported by the administrative record, and the opponent has the burden to show there is no substantial evidence whatsoever to support them. (*SP Star Enterprises, Inc. v. City of Los Angeles* (2009) 173 Cal.App.4th 459, 469). None of the claims by the Bronholly & Carolus Residents Coalition (the "Coalition") provide any substantial evidence to overturn the findings in the City's Report.

The Coalition appeals the ministerial grading and building permits for the Project. The Coalition falsely claims that the Project does not comply with specific provisions of the Oaks "D" Development Limitations ("Oaks Ordinance"), by insisting that the Project comply with both Oaks Ordinance and Baseline Hillside Ordinance ("BHO") regulations. The Property is zoned R1-1D-HCR, where the D limitation, The Oaks of Los Feliz Development Limitations (Ord. 181,136, 184,725), regulates the maximum Residential Floor Area ("RFA"), lot coverage and height of buildings. However, the Oaks Ordinance specifically states, in plain language, that properties subject to the Oaks Ordinance are exempt from those BHO regulations (stating they "*shall be exempt from Paragraphs (b) (Maximum Residential Floor Area), (d) (Height Limits) and (e) (Lot Coverage) of this Subdivision 10* [of the BHO]."") (LAMC 12.21.C.10(1)(5)). Despite these clear provisions, the Coalition proffers their alternative analysis of the City ordinance, which is not supported by substantial evidence.

Height. First, the Coalition claims that the Project exceeds the maximum 39 foot height (under the Oaks Ordinance), because there is an underground tunnel from the garage to the basement of the single family dwelling ("SFD"), and therefore, the height should be measured from the bottom of the garage to the top of the SFD, as required by the BHO. This is an attempt by the neighbors to keep any residence on the Property from being built on the hill above 39 feet from the base of the garage. However, the Oaks Ordinance specifically exempts the Project from the BHO regulations related to RFA, height and lot coverage. Under the Oaks Ordinance, the height of buildings or structures are measured from the lowest elevation on the site where the structure touches grade to the highest point on the roof. The lowest point on the SFD building at grade to the roof is 38 feet in height. As stated in the City Report, the height is not calculated from the basement level, and an underground connection from one structure to another does not create a single structure, pursuant to the City's analysis of its own building code (City Report, page 8). The City Report notes that the exterior walls of the residence and detached garage are separated

by ten feet to meet the visual and spatial separation requirement under LAMC 12.21.C.5(d), and that the existing subterranean tunnel does not impact the above-ground separation analysis. The City Report references a 1981 case, where the Board of Zoning Appeals determined that there were still two separate structures for zoning purposes, even where the two structures shared a four foot common wall and ten foot wide roof over a passageway. (ZAI 80-141-A) In the Project, there is only a subterranean five foot wide tunnel connecting the garage and SFD basement, and as a result "LADBS determined that the detached garage building and the SFD are not connected in a substantial manner and are considered separate buildings for zoning purposes, which includes but is not limited to building separation, passageway, projections and height measurements." (City Report, page 9)

Lot Coverage. Second, the Coalition similarly claims that the Project structures exceed the maximum 1,400 sf of lot coverage permitted under the Oaks Ordinance. They claim the Project has a lot coverage of 1,570 sf by counting all of the spaces, including the subterranean tunnel, the front steps, and the deck. The City Report clearly states that, in the hillside area, the City always determines lot coverage based on what structures are six feet above the ground, and does not include paved areas or subterranean structures. The Coalition claims that the Oaks Ordinance has a different, more strict, application of the lot coverage; however, the plain language of the Oaks Ordinance does not include a stricter standard. The City Report calculates the lot coverage of all structures greater than six feet in height to be 1,279 square feet, which is well within the permitted 1,400 square feet. (City Report p. 10) The City Report concludes that LADBS and DCP imposes the lot coverage under the Oaks D limitation in the same manner.

Residential Floor Area. Third, the Coalition claims that the Project exceeds the RFA in the Oaks Ordinance, because (1) the tunnel should be counted as part of the garage floor area (which counts ½ towards RFA), and (2) the two subterranean basements should not be excluded from floor area because there is a light well. The City relies on the clear standards set forth in LAMC 12.03 for calculating RFA with different regulations for properties in the Hillside area. Again, the Oaks Ordinance does not offer an alternative definition. The City Report refutes these claims and concludes that the two basement levels are not required to be included in the 1,531 square foot RFA calculation, as defined in LAMC 12.03, because (1) the floor surface above the upper basement does not exceed two feet in height any point above finished or natural grade, (2) the floor surface above the upper basement does not exceed three feet in height above finished or natural grade for 60 percent of the perimeter of the exterior basement walls, and (3) the light well, which is three feet by five feet, and is not visible from the street, did not qualify the basement as above-ground. (City Report, page 13).

Grading. Fourth, the Coalition claims the proposed grading for the Project exceeds the maximum grading export limit of 750 cy, but does not provide any evidence in the record to support the claim. The City Report confirms that the Project grading is within BHO and Hillside regulation quantities. As set forth in the plans approved for BP 15030-20001-06631, the sum of non-exempt cut (725 cy) and non-exempt fill (17 cy) total 742 cy. This results in a zoning code export amount of 708 cy of soil. Because the sum of maximum grading quantities (ie 742 cy) did

not exceed 1000 cy (allowed per Table 12.21 C.10-6 for R1 zone), and the maximum quantity of earth export (708 cy) did not exceed the by-right quantity of 750 cy (75% export allowed per LAMC 12.21 C.10(f)(2)(ii)), LADBS approved the grading plan in compliance with LAMC 12.21.C.10(f). Therefore, the Coalition's claims that common sense suggests these figures do not tell the whole story is clearly erroneous and without merit.

Retaining Walls. Fifth, the Coalition claims the Project exceeds the maximum two retaining walls permitted in the BHO ordinance. The City Report clearly refutes these claims by noting that LAMC 12.21 C.8 limits retaining walls in the Hillside area to (1) one max 12-foot high retaining wall, or (2) two max 10-foot high retaining walls. (Ord. 176,445) LAMC 12.21 C.8 permits LADBS to provide case-by-case interpretations, and issued an Intra-Department Correspondence which specified that retaining walls that are a max of six inches above grade on one side and provides access to a basement opening of not more than 5 feet wide are not required to comply with the ordinance. LADBS then permitted one 8-feet high retaining wall next to the SFD, and LADBS concluded that the light well retaining wall was not required to comply under the department determination. LADBS also determined, upon careful review, that no additional retaining walls were required for the Project, and the reference to a "Non-Retaining Wall" was for a site drainage device.

Protected Shrubs. Sixth, the Coalition claims that the supplemental permits issued, which included a toyon shrub on the revised permit site plans, should have been reviewed by the urban forestry department ("UFD"). The City Council adopted provisions adding Mexican Elderberry and Toyon shrubs to the class of protected trees and shrubs on February 4, 2021 (Ord. 186,873) The Owner submitted and the City issued supplemental permits in December 10-12, 2024 that included a Toyon shrub on the site plans. (City Report, page 18-19) The permits required hand tooling of work near the Toyon shrub to preserve it. However, the Owner did not seek or require a protected tree removal permit, and the Project is not located in the areas and is not a type of project that would trigger UFD review as set forth on the Urban Forestry Referral Form and LAMC.

CEQA. Finally, the Coalition claims that the City is required to provide review under the California Environmental Quality Act ("CEQA") because of building permit modifications issued by LADBS and street dedication reductions approved by BOE, and because the Owner agreed to make changes to the Project requested by SMMC. As stated in the City Report, all of these determinations by LADBS and BOE qualify as ministerial actions within the authority of the departments. Public Resources Code 21080(a) provides that CEQA applies to discretionary projects proposed to be carried out or approved by public agencies, and Section 21080(b)(1) statutorily exempts "ministerial projects proposed or to be carried out or approved by public agencies." A project is discretionary when an agency is required to exercise judgment or deliberation in deciding whether to approve an activity. (CEQA Guidelines, §15357.) It is distinguished from a ministerial project, for which the agency merely determines whether applicable statutes, ordinances, regulations, or other fixed standards have been satisfied. (Ibid.)

Ministerial projects are those for which "the law requires [an] agency to act ... in a set way without allowing the agency to use its own judgment.. . ." (CEQA Guidelines, §15002, subd. (i)(1).) If the law requires an agency "to act on a project in a set way without allowing the agency to use its own judgment," the project is ministerial.(CEQA Guidelines, §15002, subd. (i)(1).) Under the guidelines, certain actions, including the issuance of a building permit, are presumed to be ministerial "[i]n the absence of any discretionary provision contained in the local ordinance or other law establishing the requirements for the permit, license, or other entitlement for use."(CEQA Guidelines, § 15268, subd. (b).) "The statutory distinction between discretionary and purely ministerial projects implicitly recognizes that unless a public agency [is authorized to] shape the project in a way that would respond to concerns raised in an EIR, or its functional equivalent, environmental review would be a meaningless exercise." (*Mountain Lion Foundation v. Fish & Game Com*. (1997) 16 Cal.4th 105, 117; *Protecting our Water and Environmental Resources v County of Stanislaus* (2020) 10 Cal.5th 479) Under the functional test, a decision is ministerial if the agency has no discretionary authority to deny or shape the project. *(Leach v. City of San Diego* (1990) 220 Cal.App.3d 389, 393, see also *Health First v. March Joint Powers Authority* (2009) 174 Cal.App.4th 1135, 1144–1145.) Further, even if a statute grants an agency some discretionary authority over an aspect of a project, the project is ministerial for CEQA purposes if the agency lacks authority to address environmental impacts. In *McCorkle Eastside Neighborhood Group v. City of St. Helena* (2018) 31 Cal.App.5th 80, for example, the agency's power to conduct an aesthetic design review did not make a project discretionary because the agency "lack[ed] . . . any discretion to address environmental effects." (*Id.* at p. 94).

In the City of LA, the issuance of a building and grading permits is ministerial, and LADBS has no authority to address environmental impacts. The Coalition has not provided substantial evidence of any non-compliance with the LAMC that would require a discretionary review; therefore, CEQA has not been triggered. Even if the Project had required discretionary review, it is a 1,531 square foot single family residence that would clearly qualify for a Class 3 CEQA exemption for a small structure or three or less single family residences.

History. The Owner has resubmitted the building and grading permits, and the street improvement B-Permits, dozens of times since March 2017, in response to at least seven letters and appeals from Luna & Glushon or MRCA challenging the building permits for the Project. The building permits were originally issued in March 2022, and appealed by Luna & Glushon. After numerous revisions, including to comply with newly adopted codes, the building permits were reissued in August 2024, and again appealed by Luna & Glushon. For the street improvement permits (B-permit BR004236), the Owner submitted the plan set in March 2021, and there were five rounds of plan check corrections before the plan set was approved in March 2022. Therefore, the constant and unrelenting opposition to the Project has taken more than eight years and caused the Owner significant financial impact.

The proposed Project is a modest 1,531 square foot single family residence in a residential neighborhood on an R1 zoned lot. It complies with all of the objective standards of the building and zoning code, and the LADBS senior officials have thoroughly reviewed each appeal issue and determined that they lacked merit. Therefore, we respectfully request that you deny the appeal and support the issuance of the grading and building permits for the Project.

Sincerely,

Sheri Bonstelle

SHERI L. BONSTELLE for
Jeffer Mangels Butler & Mitchell LLP

SLB
Encl.
Exhibit A – Project Renderings and Plans
Exhibit B – City Report (incorporated by reference)

cc: Undine Petrulis, City Planner(Undine.Petrulis@lacity.org)

DAY OF HEARING SUBMISSIONS

Planning APC Central <apccentral@lacity.org>

2669 North Bronholly - DIR-2025-1000-BSA-1A

1 message

Mashael Majid <mashael.majid@lacity.org> Tue, Feb 24, 2026 at 9:37 AM
To: Planning APC Central <apccentral@lacity.org>
Cc: Undine Petrulis <undine.petrulis@lacity.org>, Armida Reyes <armida.reyes@lacity.org>

Dear President Lawrence and Honorable Central Los Angeles Area Planning Commissioners,

Our office has been familiar with the subject property since 2021, when neighbors reached out with questions and concerns regarding the scope and scale of the project as it relates to height, floor area, lot coverage, grading impacts, and its compliance with local development and zoning standards, including the Oaks of Los Feliz “D” Development Limitations Ordinance and the Baseline Hillside Ordinance.

Through the years, we met with the Planning Department, the Department of Building and Safety, and the Urban Forestry Division to get up to date information. There were subsequent requests from the Department of Building and Safety for multiple supplemental permits to clarify the number of retaining walls; for height, residential floor area, and grading calculations; to confirm the location of protected trees or shrubs; and for a "D" condition clearance. There were also concerns about an abutting protected Oak Tree on a neighboring property, and the project was previously challenged on its CEQA clearance for a tree permit granted by Urban Forestry due to the presence of a protected Toyon shrub at the site.

The project was then sent back to the Planning Department to be reviewed by the Zoning Administrator (ZA). Our office remained in agreement that there should be a comprehensive review of the proposed three-story residential dwelling with two subterranean basement levels that includes an elevator and tunneling features connecting to a garage as well as a separate recreation room to account for the total cumulative counts towards floor area, height, lot coverage, and grading and its conformance with regulations such as the Oaks D Limitations. The ZA concluded that LADBS did not err in their judgment.

We take extra care to review projects in challenging hillside geographies located within a classified Very High Fire Severity Zone prone to fires and landslides. We agree with the appellants' that this is a single structure that exceeds the height limits under the Oaks D Limitations. We also find that the daylighting basement should count toward the residential floor area, and we believe that the grading impact on the protected Toyon shrub might require a tree removal permit. For all of these reasons, we respectfully request that you consider granting the appeal in order for a redesign to occur that meets applicable and contextually critical standards.

Warmly,
Mashael

--
Mashael Majid
Deputy Chief of Staff - Planning, Housing, and Community Development
Office of Councilmember Nithya Raman

NITHYA RAMAN | Los Angeles City Councilmember 4th District

******