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

SECONDARY SUBMISSIONS

Planning CPC <cpc@lacity.org>

CPC-2025-1087-DB-VHCA – Support Operational Condition

B Newmark <bnewmark@ghetv.com> Mon, Feb 23, 2026 at 6:36 PM
To: cpc@lacity.org

Hello there. I remain very concerned about this massive building on Pico and Victoria. I wanted to send one last plead below.

Would you please require a clear operational condition directing routine commercial delivery, ride-hail, and service activity to the Crenshaw alley or arterial frontage — and not to Victoria, which is a residential street.

Thank you.

Planning CPC <cpc@lacity.org>

Subject: CPC-2025-1087-DB-VHCA – Request for Loading & Ride-Share Management Plan

Foretis Networks <foretisnet@gmail.com> Mon, Feb 23, 2026 at 9:48 PM
To: "cpc@lacity.org" <cpc@lacity.org>

Dear Commissioners,

I am writing regarding the proposed eight-story, 220-unit mixed-use building at 4201 Pico.

I understand the project qualifies under State housing law. I am not asking to reduce height, density, or unit count.

I am respectfully requesting that the Commission require the applicant to submit, prior to issuance of a Certificate of Occupancy, a clear and enforceable Loading and Ride-Share Management Plan.

This plan should designate on-site, alley-accessed, or arterial-frontage loading areas sufficient to accommodate routine delivery, service, and ride-hail activity.

Victoria Avenue is a local residential street. It should remain limited to residential garage ingress and egress, and should not be relied upon for recurring commercial staging or loading activity.

A project of this scale will generate predictable delivery and ride-hail traffic. It is reasonable to require that the developer plan intentionally for where that activity will occur — whether through the Crenshaw alley, arterial frontage, or coordination with LADOT — rather than leaving it unmanaged.

This request does not alter project entitlements. It simply ensures that operational impacts are addressed responsibly and aligned with the surrounding street hierarchy.

Thank you for your consideration.

Sincerely,

/S/ Ernest Lee

1227 South Victoria Avenue,
Los Angeles, CA 90019-3156

Planning CPC <cpc@lacity.org>

CPC-2025-1087-DB-VHCA – Support Operational Condition

Geoff Missad <gmissad@gmail.com> Mon, Feb 23, 2026 at 10:00 PM
To: cpc@lacity.org

Dear Members of the Los Angeles City Planning Commission,

I am writing regarding the proposed 8-story mixed-use development at 4201 Pico Boulevard (Pico & Crenshaw).

My family and I moved to Victoria Avenue two years ago and quickly fell in love with the neighborhood. We are raising our two young children here and value the residential character and relative calm of our street. We understand the City's urgent need for additional housing and are not writing in opposition to this project. We want it to succeed.

I am respectfully requesting that the Commission consider adding a clear operational condition directing routine commercial deliveries, ride-hail activity, and service vehicles to access the project via the Crenshaw alley or arterial frontage — and not via Victoria Avenue, which is a residential street.

Since we moved in, traffic along Victoria between Pico Boulevard and Olympic Boulevard has steadily increased. Victoria is not designed to function as a commercial access route. Without a clear directive in the project's conditions of approval, it is foreseeable that delivery drivers, ride-hail vehicles, and service traffic will default to the most convenient routing, potentially turning Victoria into a de facto loading and staging corridor. That would materially change how the street operates and raise concerns about congestion and safety for residents, pedestrians, and children.

Importantly, this request:

- Does not reduce units, height, or density;
- Does not challenge State housing law;
- Does not affect the project's viability;
- Simply ensures that routine commercial activity is directed toward streets designed to handle it.

This is a narrow, practical amendment that protects the residential integrity of Victoria Avenue while allowing the development to proceed as proposed. Thoughtful operational planning at this stage can prevent avoidable impacts later.

Thank you for your time and consideration. I respectfully ask that you give this request serious consideration as you review the project.

Sincerely,
Geoff Missad
1179 S. Victoria Ave.
Los Angeles, CA 90019
gmissad@gmail.com
310-463-5850

Planning CPC <cpc@lacity.org>

CPC-2025-1087-DB-VHCA - Please Include a Clear Ride-Share and Delivery Condition – 4201 Pico

Jcfeldman <jcfeldman@gmail.com>
To: cpc@lacity.org

Mon, Feb 23, 2026 at 11:15 PM

Dear Members of the Planning Commission,

My name is Josh Feldman, and I live on Windsor Avenue in Oxford Square. My wife and I have two sons, and we are active in this neighborhood.

I support new housing and understand that this project qualifies under State housing law. I am not asking you to reduce the size of the building or change its height.

I am writing to support one specific condition of approval: requiring a Loading and Ride-Share Management Plan that directs routine ride-hail, delivery, and commercial service activity to the Crenshaw alley or arterial frontage rather than allowing it to operate from Victoria Avenue.

A building of this scale will generate significant daily vehicle activity — not just resident trips, but app-based pickups, food delivery, package vans, and service vehicles. If those activities are not clearly routed and managed, they will occur wherever access is easiest and most visible. In this case, that would mean increased short-term stopping and commercial activity along a residential block.

This condition does not interfere with State law, reduce units, or change entitlements. It simply requires that daily commercial operations be planned intentionally and aligned with the surrounding street network.

Directing routine commercial activity to Crenshaw or the alley — and keeping Victoria limited to resident access — is a reasonable and practical safeguard.

I respectfully ask that you include this condition in your approval.

Thank you for your time and consideration.

Sincerely,

Josh Feldman

Windsor Avenue

Oxford Square

Sent from my iPhone

Planning CPC <cpc@lacity.org>

CPC-2025-1087-DB-VHCA – Request from a Victoria Avenue Resident

Octavia Fielder <octaviaafielder@gmail.com> Mon, Feb 23, 2026 at 5:57 PM
To: "cpc@lacity.org" <cpc@lacity.org>

Dear Commissioners,

My name is Juanita Octavia Fielder, and I am 91 years old. I live at 1233 S Victoria Avenue with my daughter.

I'm an old lady to say the least. And I so glad that I have gotten to spend these past few years in such a lovely neighborhood filled with historic homes. I walk on Victoria most days. It is a peaceful street where neighbors greet one another and where people of all ages feel comfortable walking.

I understand that the proposed 4201 Pico development qualifies under State housing law. I am not asking that it be reduced in size.

I am asking that the neighborhood is asking that the developer submit a clear Loading and Ride-Share Management Plan so that routine delivery and ride-hail activity is directed to Crenshaw or other arterial frontage — not to Victoria Avenue. I support this idea and also any other mitigations that will protect this residential street Victoria was not designed to function as the commercial frontage for a large mixed-use building.

I know that Los Angeles is a huge city and also that it has not kept up with its density needs. I encourage more housing but I also believe there can be more housing and consideration for residential neighborhoods. They don't have to be at odds. A few adjustments and everyone can be happy!

Thank you for your time and consideration.

Sincerely,
Juanita Octavia Fielder
Victoria Avenue Resident

Planning CPC <cpc@lacity.org>

Fwd: 4201 W Pico Blvd Case No. CPC-2025-1087-DB-VHCA

Josh Gordon <2joshgordon@gmail.com> Thu, Feb 19, 2026 at 5:27 PM
To: cpc@lacity.org

Joshua Gordon

---------- Forwarded message ---------
From: **Josh Gordon** <2joshgordon@gmail.com>
Date: Thu, Feb 19, 2026, 4:31 PM
Subject: 4201 W Pico Blvd Case No. CPC-2025-1087-DB-VHCA
To: <esther.ahn@lacity.org>

4201 W Pico Blvd – residential traffic impacts and post-occupancy safeguards (CPC-2025-1087-DB-VHCA)

Dear Ms. Ahn,

I am a nearby resident writing regarding the proposed project at 4201 W Pico Boulevard (Case No. CPC-2025-1087-DB-VHCA).

My primary concern is the concentration of traffic and daily operational activity onto Victoria Avenue. Victoria already functions as a shortcut between Pico and Olympic, and routing the project's primary residential garage access onto this street is likely to increase cut-through traffic, turning movements, queuing, and congestion on a residential block that was not designed to function as a major access route. In fact, LADOT installed speed humps on Victoria Avenue several years ago due to concerns about high-speed cut-through traffic, underscoring the street's existing sensitivity to these conditions.

Given this context, additional project-related vehicle trips risk compounding an already strained situation. Even relatively modest increases in daily traffic can meaningfully affect safety, driveway access, and overall quality of life on a residential street, and once a building of this scale is occupied, these patterns can escalate quickly and become difficult to reverse.

For that reason, if post-occupancy conditions show that traffic volumes, cut-through behavior, or safety concerns on Victoria worsen, it is important that the City retain clear authority to require additional traffic-calming and access-management measures. These could include tools LADOT already uses elsewhere in the City, such as turn restrictions, directional controls, physical traffic-calming features, or other interventions designed to protect residential streets while maintaining emergency and service access.

Accordingly, I hope the conditions of approval will include enforceable post-occupancy monitoring and preserve LADOT's flexibility to require additional mitigation if conditions on Victoria Avenue deteriorate over time.

Thank you for your time and consideration.

Sincerely,
Joshua Gordon
Joshua Gordon

Planning CPC <cpc@lacity.org>

4201 Pico (Victoria Ave access)

JUDITH JEANSON <hotomato1@aol.com> Mon, Feb 23, 2026 at 5:09 PM
To: CPC@lacity.org
Cc: Mary Beth Fielder <mbfielder@gmail.com>

Dear Commissioners,

My name is Judy Jeanson and I live on Victoria Avenue.

I have no argument with your project. My concern is the access proposed on my street for vehicles, especially industrial vehicles. Our streets have recently received historical protection, largely because of their unique tranquil tree lined streets and vintage homes. Movies film here because of this. They love the special calm 1936 look and there are not many neighborhoods like this. The city makes money from this, from permits issued for movies and tv series. Should you alter the landscape of this area with intrusive and possibly loud trucks and drop offs the value to us to the city will be lost.

Again. I have no problem with your project. Just leave our street alone. Please rethink this plan. Thank you.
Sincerely, Judy Jeanson

Sent from my iPhone

Planning CPC <cpc@lacity.org>

Please Protect Victoria Avenue from Commercial Loading Activity – 4201 Pico

Ki Nassauer <ki@kinassauer.com> Tue, Feb 24, 2026 at 9:21 AM
To: cpc@lacity.org

Dear Members of the Planning Commission,

My name is Ki, and I live in the guest house behind my daughter and her family on Victoria Avenue. I help care for my grandchildren, and I walk this street every day.

Victoria is a residential block. It is where children ride bikes, where neighbors walk dogs, and where families move through their day at a human pace. It has a certain rhythm that makes it feel safe and livable.

I understand that this project is governed by State housing law, and I am not asking for fewer units or a smaller building. I also understand that resident garage access will remain on Victoria.

What concerns me is the lack of a clear operational plan for ride-hail pickups, delivery vans, and routine service activity. Without a defined plan, those vehicles may naturally use the Victoria entrance

That would introduce frequent stopping, turning, idling, and short-term commercial activity onto a residential street where people walk daily and children are present.

The proposed amendment is reasonable. It does not change the project's size or legality. It simply directs routine commercial loading and ride-hail activity to the Crenshaw alley or arterial frontage, which are streets designed to handle that intensity of use.

Victoria should remain residential in character, limited to resident access.

I respectfully ask that you adopt the Loading and Ride-Share Management Plan condition to ensure this project operates responsibly once occupied.

Thank you for your time and careful consideration.

Sincerely,

Ki

Victoria Avenue

--
Ki Nassauer
952-250-8866

THE BOOK: Lived-In Style *The Art of Creating a Feel-Good Home*

Be sure to check out:
Lived-In Style Magazine
Instagram

Planning CPC <cpc@lacity.org>

CPC-2025-1087-DB-VHCA – Request for Operational Safeguard

Lisa Jaime <ldjaime@mac.com> Mon, Feb 23, 2026 at 9:51 PM
To: cpc@lacity.org

Dear Commissioners,

I am writing regarding the proposed eight-story, 220-unit mixed-use building at 4201 Pico.

I understand that the project qualifies under State housing law. I am not asking you to reduce height or units.

I am asking for one operational safeguard.

The building fronts Pico and Crenshaw, both arterial streets. However, the residential garage access is located on Victoria Avenue, which is a local residential street.

The project does not currently include a defined Loading and Ride-Share Management Plan specifying where recurring delivery, service, and ride-hail activity will occur.

A building of this size will inevitably generate that activity. The question is where it will be managed.

I respectfully ask that you require routine commercial loading and ride-hail activity to be directed to the Crenshaw alley or arterial frontage — not to Victoria Avenue.

This does not change entitlements. It simply ensures that operational impacts are managed appropriately and not shifted onto a residential street.

Thank you for your consideration.

Sincerely,

Lisa Jaime

Oxford Square resident

Planning CPC <cpc@lacity.org>

CPC-2025-1087-DB-VHCA-4201 W.Pico Boulevard

lynn kuwahara <lynnkuwahara@yahoo.com> Tue, Feb 24, 2026 at 3:44 AM
To: "cpc@lacity.org" <cpc@lacity.org>
Cc: "mbfielder@gmail.com" <mbfielder@gmail.com>

Dear Commissioners,

My parents bought the house at 11110 South Windsor Boulevard. I was 13 years-old. I am now 73 years-old, you do the math.
My father would drive us, my Mom, older sister and two older brothers and me, looking at houses. But when he saw the little
house on Windsor Boulevard, that was it. No more looking. It was such a pretty neighborhood.

My Daddy was a 442nd veteran, our African-American neighbor, Mr. Fuller,, across the street, was a WWII Pilot and the neighbor
a few doors south of us a WWII Captain married to a Korean lady.

Our neighborhood has a proud history that should not be destroyed for the convenience of delivery trucks, taxi service, snd
cut-through traffic. A little respect for our neighborhood would be nice. Please don't rush ahead without considering the affect of 4201 W. Pico Boulevard will have on the neighbors.

I understand the 8-story building height is no longer under consideration. I wish you could have considered the 3-4 story profile of the apartments that face Burton Way. It's a more humane profile then 8 stories!

Please adopt the traffic recommendations that Mary Beth Fielder e-mailed to me.
I could repeat them, but I don't have the strength. I haven't been well, but getting better.

Thank you for your consideration,

Lynn Kuwahara
1110 South Windsor Boulevard
Los Angeles, CA 90019
lynnkuwahara@yahoo.com

Lynn Kuwahara
(310) 871-0957 Cell

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February 19, 2026

VIA EMAIL

Monique Lawshe, President
Caroline Choe, Vice President
Priscilla Chavez, Commissioner
Martina Diaz, Commissioner
Sarah Johnson, Commissioner
Phyllis Klein, Commissioner
Brian Rosenstein, Commissioner
Jacob Saitmna, Commissioner
Elizabeth Zamora, Commissioner
Los Angeles City Planning Commission
City of Los Angeles
200 N. Spring Street, Room 272
Los Angeles, CA 90012
cpc@lacity.org

Esther Ahn, City Planner
Expedited Processing Division
City Planning Department
City of Los Angeles
200 N. Spring Street, Room 763
Los Angeles, CA 90012
esther.ahn@lacity.org

Re: Comment on Decision to Exempt the 4201 W. Pico Blvd Project from Environmental Review Under the California Environmental Quality Act ("CEQA") Based on Consistency with the Previously-Certified 2021-2029 City of Los Angeles Citywide Housing Element Environmental Impact Report

Dear President Lawshe, Vice President Choe, Honorable Members of the Planning Commission, and Ms. Ahn:

This comment is submitted on behalf of Supporters Alliance for Environmental Responsibility ("SAFER"), regarding the project known as the 4201 W. Pico Blvd Project (CPC-2025-1087-DBVHCA; ENV-2025-1088-HES), which proposes the construction of a 43,448 square-foot mixed-use residential development ("Project"). SAFER objects to the City's decision to exempt the Project from environmental review under the California Environmental Quality Act ("CEQA"). The City contends that CEQA review is not required because the Project is allegedly consistent with the previously-certified 2021-2029 City of Los Angeles Citywide Housing Element Update and Safety Element Update Environmental Impact Report (SCH 2021010130) ("HEU EIR"). However, and as explained further below, the Project is not consistent with, nor is it within the scope of the HEU EIR, thus requiring project-level environmental review to adequately analyze and mitigate the Project's impacts.

PROJECT DESCRIPTION

The Project involves the construction of an 8-story mixed-use residential and commercial development with 220 residential units that include 35 restricted affordable units (18 Very Low Income and 17 Moderate Income affordable units) and approximately 12,496 square feet of ground-floor commercial space for a total floor area of 167,900 square feet. The Project would also include 714 parking spaces within three levels of podium parking. The Project site is located at 4201-4221 West Pico Boulevard and 1261 South Crenshaw Boulevard adjacent to a Oxford Square Historic Preservation Overlay Zone ("HPOZ") and a designated historic resource located at 1262 S. Victoria Avenue.

LEGAL STANDARD

Under CEQA Section 15168, a programmatic EIR is prepared to analyze broad, program-level impacts. Then, project-level EIRs are prepared when specific projects are proposed. The project-level EIRs can rely on the program-EIR as appropriate, but must analyze project-specific impacts. The CEQA Guidelines set forth the use of a Program EIR with later activities. "Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared." (CEQA Guidelines § 15168(c).) Section 15168(c) provides:

> (1) If a later activity would have effects that were not examined in the program EIR, a new initial study would need to be prepared leading to either an EIR or a negative declaration. That later analysis may tier from the program EIR as provided in Section 15152.
>
> (2) If the agency finds that pursuant to Section 15162, no subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required. Whether a later activity is within the scope of a program EIR is a factual question that the lead agency determines based on substantial evidence in the record. Factors that an agency may consider in making that determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure, as described in the program EIR.
>
> (3) An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program.
>
> (4) Where the later activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the program EIR.
>
> (5) A program EIR will be most helpful in dealing with later activities if it provides a description of planned activities that would implement the program and deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed project description and analysis of the program, many later activities

> could be found to be within the scope of the project described in the program EIR, and no further environmental documents would be required.
>
> (CEQA Guidelines § 15168(c)(1)-(5) [emph. added].)

DISCUSSION

A. The Housing Element Update EIR was a Programmatic-Level EIR, not a Project-Level EIR. It Did not Analyze this Project at All. Project-Level CEQA Review is Required for this Project.

The Housing Element Update EIR is, and clearly stated that it was, a program-level EIR, and that later project-level CEQA review would be required. Program EIRs analyze impacts of high-level agency actions, such as general plans, at a very broad, generalized level. Program EIRs do not, and cannot, analyze project-specific impacts since there is usually no specific project proposed. Program EIRs are followed by streamlined project EIRs, which can rely on the program EIR to the extent appropriate. Here, the City is improperly attempting to use the programmatic Housing Element Update EIR to avoid project-level CEQA analysis. This is improper. The HEU EIR was not intended to be project-specific. It was a general planning document for the entire city that did not analyze this Project at all. The HE EIR states:

> Degree of Specificity. An EIR on an individual development project will be more detailed in the specific effects of the project than will an EIR on the adoption of a long-range planning document, such as a general plan, general plan element, community plan or zoning ordinance because the effects of the individual development can be predicted with greater accuracy. An EIR on a project such as the adoption of a general plan and/or general plan element should focus on the secondary effects that can be expected to follow from the adoption, but need not be as detailed as the analysis on the specific construction project that might follow (CEQA Guidelines Section 15146).

(HEU Draft EIR, p. 1-2). After informing the public that the HEU EIR was a program-level EIR, and that project-level CEQA review would be required under CEQA section 15168, the City now ignores that promise, and seeks to avoid project-level CEQA review entirely. The Housing Element EIR did not analyze the impacts of the instant Project. Project-specific CEQA review is required for this Project.

B. The Project is Outside the Scope of the Housing Element EIR Because it is Inconsistent with the Housing Element EIR.

The City cannot rely on the Housing Element Update EIR to analyze this Project because the Project is inconsistent with the HEU EIR. The Court of Appeal has recently held that a city may not rely on a programmatic EIR when the proposed project is inconsistent with the general or specific plan.

A subsequent project is not within the scope of a previous program EIR if it is inconsistent with the plan addressed in the program EIR. "If the subsequent project is not consistent with the program or plan, it is treated as a new project and must be fully analyzed in a project—or another tiered EIR if it may have a significant effect on the environment." (*Friends of Coll. of San Mateo Gardens v. San Mateo Cnty. Cmty. Coll. Dist*., 1 Cal. 5th 937, 960, 378 P.3d 687, 702 (2016)). Generally, the standard set forth for this analysis is substantial evidence. However, where a later proposal is not either the same as or within the scope of the project described in the Program EIR, then review of the proposal is not governed by CEQA's deferential substantial evidence standard, but rather, under the "fair argument" standard.

The Project is not consistent with the HEU EIR. The Project is requesting waivers of several zoning provisions. The HEU EIR assumed that future projects would comply with the zoning.[1] The court of appeals recently held that a Project that is inconsistent with a prior specific plan EIR may not rely on that EIR, and must prepare a subsequent CEQA document to analyze the impacts of any and all inconsistencies with the specific plan zoning. (*Save Our Access v. City of San Diego*, 115 Cal.App.5th 388 (2025) (*Save Our Access II*); *Save Our Access v. City of San Diego*, 92 Cal.App.5th 819 (2023) (*Save Our Access I*).) Here, the Project seeks waivers that make the Project inconsistent with applicable zoning analyzed in the HEU EIR. For example, the Project seeks the following waivers pursuant to the Density Bonus Law (Gov. Code section 65915):

a. An Off-menu incentive to allow an increase in the Floor Area Ratio (FAR) to 3.86:1 in lieu of the otherwise allowable 1.5:1 in the C4-1-O Zone;
b. An Off-menu incentive to allow a 31.4 percent reduction in required open space to allow 15,800 square feet in lieu of the otherwise required 23,025 square feet;
c. An Off-menu incentive to allow a side yard setback of zero feet in lieu of the 11 feet otherwise required abutting Victoria Avenue;
d. An Off-menu incentive to allow relief from Transitional Height requirements; and
e. A waiver of development standards to allow a 30.9 percent reduction in the amount of required planted trees to allow 38 trees in lieu of the 55 trees otherwise required.

Exempting the Project from CEQA based on consistency with the previously-certified Housing Element EIR violates CEQA because the proposed project is inconsistent with the provisions of the Housing Element EIR and contains significant environmental impacts that were not addressed in the Housing Element EIR. SAFER requests that an initial study be conducted and a CEQA document prepared to analyze and mitigate the Project's environmental impacts.

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[1] *See* City of Los Angeles Housing Element 2021-2029 Update / Safety Element Update Draft EIR, p. 4.9-15 ("The Housing Element Update would be consistent with all applicable land use policies, goals, strategies, and/or objectives contained in the City of Los Angeles General Plan and SCAG's 2020-2040 RTP/SCS.") https://planning.lacity.gov/development-services/eir/Housing-Element_2021-2029_Update_Safety-Element_Update_deir.

The City Planning Commission should decline to approve the Project until proper CEQA review is completed.

C. CEQA Review is Required to Analyze Potentially Significant Impacts on Historic Resources.

A CEQA exemption is not allowed because there is a fair argument that the Project may have adverse impacts to an historic resource. CEQA section 21084(e) provides, "A project that may cause a substantial adverse change in the significance of a historical resource, as specified in Section 21084.1, shall not be exempted from this division pursuant to subdivision (a)." In CEQA section 21084.1, the California legislature prohibits the use of a CEQA exemption for projects that may cause a substantial adverse change in the significance of a historical resource. Under CEQA sections 21084(e), and 21084.1, and CEQA guidelines sections 15064.5, and 15300.2, a categorical exemption from CEQA may not be issued for any project that may cause a substantial adverse change in the significance of a historical resource. This includes changes to the "immediate surroundings such that the significance of an historic resource would be materially impaired." CEQA Guidelines section 15064.5(b)(1).

The Project site abuts a designated historical resource located at 1262 Victoria Avenue, otherwise known as the William Grant Still Residence, which the City has declared a Historic Cultural Monument ("HCM").[2] The William Grant Still Residence is part of the Oxford Square HPOZ and Oxford Square HPOZ Preservation Plan.[3] The Oxford Square HPOZ encompasses multiple properties in the 1200 block of Victoria Avenue directly west of the Project site, all of which are designated historical resources. [4]

Although the Project will not destroy any buildings in the Oxford Square HPOZ, it will adversely affect the historic nature of the HPOZ. Under CEQA sections 21084(e), and 21084.1, and CEQA guidelines sections 15064.5, and 15300.2, a categorical exemption from CEQA may not be issued for any project that may cause a substantial adverse change in the significance of a historical resource. This includes changes to the "immediate surroundings such that the significance of an historic resource would be materially impaired." CEQA Guidelines section 15064.5(b)(1). The Project is adjacent to an HPOZ and requesting a zero feet setback from a designated historical resource which will "materially impair" the "immediate surroundings" of the historic buildings in the HPOZ and the HPOZ itself.

The Project's impacts on the William Grant Still Residence and the greater Oxford Square HPOZ must be analyzed in a CEQA document.

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[2] Los Angeles City Planning, Historic-Cultural Monument List, https://planning.lacity.gov/odocument/24f6fce7-f73d-4bca-87bc-c77ed3fc5d4f/Historical%20Cultural%20Monuments%20List.pdf

[3] Los Angeles City Planning, Oxford Square HPOZ, Preservation Plan, https://planning.lacity.gov/odocument/9935aacd-107f-475b-8cb9-a99f084b72a5/Preservation_Plan_Oxford_Square.pdf.

[4] Los Angeles City Planning, Oxford Square HPOZ, Maps, https://planning.lacity.gov/odocument/eaac03ca-565e-4935-b930-b832a66765ff/Survey_Map_Oxford_Square.pdf

D. Supplemental CEQA review is required because the HEU EIR failed to mitigate all significant impacts, and acknowledged significant unmitigated impacts. These impacts must be analyzed and mitigated at a project-specific level.

The HEU EIR failed to adequately mitigate all of the environmental impacts of the Housing Element Update. It acknowledged that the Housing Element would have numerous significant unmitigated impacts. These impacts must be analyzed under CEQA and mitigated at the project level.

The HEU EIR acknowledged that the Housing Element would have significant unmitigated impacts on air quality, biological resources, cultural resources (including historic resources), geology and soils, hazards and hazardous materials, noise, public services, recreation, transportation, tribal cultural resources, and wildfire. (HEU Draft EIR, p. 2-8).

In the case of *Communities for a Better Environment v. Cal. Resources Agency* (2002) 103 Cal.App.4th 98, 122-125, the court of appeal held that when a "first tier" EIR admits a significant, unavoidable environmental impact, then the agency must prepare second tier EIRs for later phases of the project to ensure that those unmitigated impacts are "mitigated or avoided." (*Id.* citing CEQA Guidelines §15152(f).) The court reasoned that the unmitigated impacts were not "adequately addressed" in the first tier EIR since they were not "mitigated or avoided." (*Id*.) Thus, significant effects disclosed in first tier EIRs will trigger second tier EIRs unless such effects have been "adequately addressed," in a way that ensures the effects will be "mitigated or avoided." (*Id*.) Such a second tier EIR is required, even if the impact still cannot be fully mitigated and a statement of overriding considerations will be required. The court explained, "[t]he requirement of a statement of overriding considerations is central to CEQA's role as a public accountability statute; it requires public officials, in approving environmental detrimental projects, to justify their decisions based on counterbalancing social, economic or other benefits, and to point to substantial evidence in support." (*Id*. at 124-125.) The Court specifically rejected a prior version of the CEQA guidelines regarding tiering that would have allowed a statement of overriding considerations for a program-level project to be used for a later specific project within that program. (*Communities for a Better Env't v. California Res. Agency* (2001) 103 Cal.App.4th 98, 124, disapproved on other grounds by *Berkeley Hillside Pres. v. City of Berkeley* (2015) 60 Cal.4th 1086.) Even though "a prior EIR's analysis of environmental effects may be subject to being incorporated in a later EIR for a later, more specific project, the responsible public officials must still go on the record and explain specifically why they are approving the later project despite its significant unavoidable impacts." (*Id*., pp. 124-25.)

Since the HEU EIR left numerous environmental impacts significant and unmitigated, subsequent CEQA review is required to analyze and mitigate those impacts at the project-level.

CONCLUSION

The Project requires supplemental CEQA review to analyze and mitigate its impacts at the project-specific level, including impacts on historical resources. For these reasons, SAFER respectfully requests that the Planning Commission deny approval of the Project.

Sincerely,



Kylah Staley
Lozeau Drury LLP

Planning CPC <cpc@lacity.org>

CPC-2025-1087-DB-VHCA – Predictable Outcome + Management Gap

Margaret Aaronson <msmhaddad@gmail.com>
To: cpc@lacity.org

Mon, Feb 23, 2026 at 10:09 PM

Dear Commissioners,

I'm extremely concerned that the current design of the 4201 PICO 90019 building proposal establishes residential access on South Victoria Avenue but it does not establish where routine ride-share and delivery activity will occur.

There is no defined staging area, no recessed layby, and no clear prohibition on commercial activity along the residential frontage.

In the absence of a management plan for this new daily influx of hundreds of vehicles, recurring commercial vehicles will end up using the most convenient access point. That is not speculative — it is a predictable operational outcome.

So, I am asking you to please require a **Loading and Ride-Share Management Plan** that directs recurring commercial activity to Crenshaw Blvd. or other arterial frontage, not South Victoria Avenue.

Thank you.

Margaret Aaronson

CPC-2025-1087-DB-VHCA-Support Condition

Mary Beth Fielder <mbfielder@gmail.com> Mon, Feb 23, 2026 at 12:15 PM
To: Suzi Click <suziclick@gmail.com>
Cc: cpc@lacity.org, David Lewis <dblsart@att.net>

Thank you, Suzi. Is there any way you or David might could attend the Thursday hearing either in person or via Zoom? I understand public comment shows that the neighborhood is united and bodies in the room make a difference. If not, I totally understand. We're all busy people and these hearings on weekdays makes it impossible for most. This could also set a precedent for future development on Pico between Victoria and Windsor. That block is already bundled and on the market for development so I imagine it could be next.

Best,
Mary Beth
[Quoted text hidden]

Planning CPC <cpc@lacity.org>

Support Condition for 4201 Pico

Murray Cohen <murrayfcohen@gmail.com>
To: Cpc@lacity.org

Mon, Feb 23, 2026 at 4:34 PM

Dear Commissioners,

I live on Victoria Avenue near the proposed 4201 Pico development.

We understand the project will move forward. Our request is limited and practical: please require that routine delivery vehicles, ride-hail pickups, and service trucks be directed to the commercial frontage or alley access rather than to Victoria.

Victoria is a narrow residential street with homes, driveways, and everyday neighborhood activity.

This small operational condition would make a meaningful difference in preserving residential function.

Thank you for your attention.

Sincerely,

Murray Cohen

Planning CPC <cpc@lacity.org>

CPC-2025-1087-DB-VHCA – Request to Add Condition of Approval

Mary Beth Fielder <mbfielder@gmail.com> Fri, Feb 20, 2026 at 3:54 PM
To: cpc@lacity.org

Dear Commissioners,

I am writing regarding Item CPC-2025-1087-DB-VHCA (4201 Pico Boulevard), scheduled for hearing on February 26.

I am not requesting changes to density, height, or State-mandated housing provisions. I understand that the project qualifies under State housing law and that the Commission's discretion is limited in that regard.

However, I respectfully request that the Commission add a narrowly tailored operational Condition of Approval to address the predictable impact of routine commercial loading and ride-hail activity on Victoria Avenue, a local residential street directly adjacent to the project.

The project includes arterial frontage on Pico Boulevard and Crenshaw Boulevard, as well as alley access from Crenshaw. Without a designated loading and ride-share management plan, delivery vehicles, ride-hail drivers, and service trucks will naturally utilize the closest curb access point. On a project of this scale — eight stories, approximately 220 residential units, and ground-floor commercial space — that activity is likely to occur frequently throughout the day.

While such activity is appropriate on arterial streets, routine commercial staging on a residential frontage creates foreseeable conflicts, including double parking, blocked driveways, and peak-hour congestion.

I respectfully propose the following Condition of Approval:

Proposed Condition of Approval

Prior to issuance of a Certificate of Occupancy, the applicant shall submit to the Department of City Planning for review and approval a Loading and Ride-Share Management Plan. The Plan shall designate on-site, alley-accessed, or arterial-frontage loading areas sufficient to accommodate routine delivery, ride-hail, and commercial service activity.

Routine commercial loading, delivery, ride-hail, and service vehicle activity shall be directed to the Crenshaw alley access or arterial frontage and shall not utilize Victoria Avenue for staging or recurring commercial loading activity, except for resident access.

The operator shall implement operational measures, signage, and management protocols necessary to prevent recurring commercial loading activity within the Victoria Avenue residential frontage.

This condition does not reduce units, alter height, or conflict with State housing law. It simply directs routine commercial activity to the street network designed to accommodate it, consistent with the City's adopted street hierarchy and the protection of adjacent residential streets.

Thank you for your consideration.

Respectfully,

Mary Beth Fielder
Resident, Oxford Square

Planning CPC <cpc@lacity.org>

CPC-2025-1087-DB-VHCA

1 message

Nathaniel Silberg <nat.silberg@gmail.com> Mon, Feb 23, 2026 at 4:28 PM
To: cpc@lacity.org

What other hurdles does this project have to clear before breaking ground? Is Thursday's hearing/vote the final step?

Nathaniel Silberg
(323)680-5532
Instagram/Twitter: @**SweetPBoogaloo**

February 21, 2026
Department of City Planning
City of Los Angeles
200 N. Spring St., Room 763
Los Angeles, CA 90019

Attention: Esther Ahn, City Planner

Re: 4201 W Pico Boulevard — Case No. CPC-2025-1087-DB-VHCA ("Project")

Dear Ms. Ahn,

On behalf of the Olympic Park Neighborhood Council (OPNC), we are writing to formally submit for the record our requested conditions and improvements for the project at 4201 W Pico Boulevard (Case No. CPC-2025-1087-DB-VHCA). While we support the development of a mixed-use residential and retail project on this site, we have concerns about the project's impact on the adjacent residential streets.

The project as proposed, with 220 residential units and primary vehicle access from Victoria Avenue, will more than double the number of residences in the immediate area. While we welcome more residents in the neighborhood, without appropriate and thoughtful project design, this will transform Victoria Avenue into a high-volume access and service corridor for a large-scale development. To prevent this, the building's design must integrate traffic solutions, providing adequate on-site turnaround space and designated off-street areas within the garage for passenger drop-offs, pick-ups, and deliveries. Additionally, we are requesting that the project incorporates a streetscape treatment reflective of the neighborhood's historic context.

To address these concerns and to ensure the project is a positive addition to our community, we request the following conditions and improvements:

- Turning restrictions at the project driveway to minimize neighborhood circulation and discourage cut-through traffic
- Operational controls to prevent queuing, staging, or spillback onto Victoria Avenue
- Routing of all service and trash operations away from Victoria Avenue
- Fully enclosed internal trash and recycling rooms
- No curbside trash bin staging or pickup on Victoria Avenue
- Daytime service hours only
- Location of ride-hailing, guest pickup, and deliveries on Crenshaw Boulevard
- Designated pickup/drop-off and courier delivery areas on Crenshaw Boulevard, consistent with the project's main entrance frontage
- Prohibition of ride-hailing, food delivery, and package delivery stopping on Victoria Avenue
- Clear signage and building management policies directing short-term stopping

activity away from the residential street

- In addition to adding traffic mitigation within the design of the building, add adequate turn around, drop off, delivery, and off street drop off and pick up within the garage
- Streetscape treatment surrounding the building to reflect the neighborhood's historic context, with landscaping and tree-canopy requirements met or exceeded to support neighborhood character and environmental quality

These requests are intended to direct operational impacts to arterial streets and ensure the project's streetscape enhances the neighborhood's historic character.

Thank you for considering these neighborhood-level improvements as part of the project review.

Sincerely,
Olympic Park Neighborhood Council

Kate Kunzman Chan

Kate Kunzman Chan
Outreach Committee Chair and Board Member, Olympic Park Neighborhood Council

Cc: Council District 10, Olympic Park Neighborhood Council Board

Planning CPC <cpc@lacity.org>

CPC-2025-1087-DB-VHCA – Predictable Outcome + Management Gap

Robert Aaronson <rjaaronson@gmail.com>
To: cpc@lacity.org

Tue, Feb 24, 2026 at 9:45 AM

Dear Commissioners,

As a homeowner on S. Victoria Ave., I am writing to express my concern about the clear lack of consideration for traffic mitigation on our residential street for the development at 4201 Pico.

As I understand it, all commercial vehicles will be channeled directly onto our block of Victoria Ave. Frequent delivery vans, food service vehicles, and ride-hail staging on a residential street changes daily life. It introduces congestion and friction where people walk, park, and enter their homes.

There is no defined staging area, no recessed layby, and no clear prohibition on commercial activity along the residential frontage.

We are asking for one thing: **a clear management plan directing recurring commercial activity to the arterial frontage on Crenshaw.**

That is consistent with good planning. It preserves balance between growth and livability.This request does not reduce units or affect State law compliance.

It simply ensures thoughtful operations.

Thank you for your consideration.

Thank you.

--
Robert Aaronson
1237 S Victoria Ave, Los Angeles, CA 90019

Planning CPC <cpc@lacity.org>

CPC-2025-1087-DB-VHCA public comment from S Victoria Ave in Oxford Square

Robert Cresswell <rc@malachiarts.com> Mon, Feb 23, 2026 at 10:53 PM
To: cpc@lacity.org
Cc: Robert Cresswell <rc@malachiarts.com>

Dear City Planning Staff and Commissioners,

My name is Robert Cresswell, and I live near the end of Victoria Avenue close to Country Club Drive. I often walk and drive in the area, and as a parent of a young child, I'm very mindful of traffic and safety on our neighborhood streets.

I support housing and understand the City's need to plan for growth. My concern isn't about the size or density of the proposed 4201 W Pico Boulevard project, but about how daily traffic and activities from the development will affect the safety of nearby residential streets. The developer appears eager to consume community resources, rather than proactively address these concerns inside the envelope of their project. Please intervene to protect your constituents.

Victoria Avenue is a residential street that already needed speed humps and traffic-calming measures because of past problems with speeding and unsafe cut-through driving. If access for the proposed 222-unit building is focused on the Pico end of Victoria, and ride-hail, delivery, and service vehicles are not well managed, it could bring back the same safety issues these measures were meant to fix.

If ride-hail pick-ups, drop-offs, deliveries, and short-term stops are not fully internalized on-site or otherwise managed, this activity will predictably create a mess on Victoria Avenue, leading to: cars double-parking, blocking visibility, creating traffic, and increasing risks for pedestrians and families who use the street every day.

The garage exit for the project should also be directed towards Pico Boulevard. Ideally, drivers exiting 4201 Pico should not be allowed to turn right onto Victoria, as this would send more traffic Northbound through the residential area.

I am asking for a clear enforceable condition to keep commercial loading and ride-hail activity inside the project or on Pico Blvd (the arterial frontage), and away from Victoria Avenue. Additionally, traffic from the 222-unit building should be directed to Pico and Crenshaw, larger arterial streets that can better handle it, rather than overwhelming the adjacent HPOZ residential neighborhood.

These are two simple, reasonable steps to protect the neighborhood's safety and livability while allowing the project to move forward.

Thank you for your time,
Robert

--
Robert Cresswell
Malachiarts Founder / Principal

Planning CPC <cpc@lacity.org>

CPC-2025-1087-DB-VHCA – Support Operational Condition

Randy Palisoc <randypalisoc@gmail.com> Mon, Feb 23, 2026 at 11:58 PM
To: cpc@lacity.org

Dear Commissioners,

I live on Victoria Avenue, which is directly affected by the proposed 4201 W. Pico Blvd. project.

Although I understand that this eight-story, 220-unit mixed-use building qualifies under State housing law, it is still excessively tall and large for this residential neighborhood.

To mitigate the negative impacts on our neighborhood, I am asking that the applicant be required to submit a clear, enforceable Loading and Ride-Share Management Plan before occupancy that:

1. directs delivery vehicles, service trucks, and ride-hail activity to use Crenshaw Blvd. and Pico Blvd, which are arterial corridors, and
2. does NOT permit such activities on Victoria Ave., which is a residential street.

Victoria is a local residential street and was not designed to function as the commercial frontage for a large mixed-use development.

A building of this scale will generate predictable commercial activity. It is reasonable to require the developer to plan intentionally for where that activity will occur — whether through the Crenshaw alley, arterial frontage on Pico or Crenshaw — and not to allow it to default to Victoria Ave., a residential street.

The City has an adopted street hierarchy. Arterials are intended to handle commercial traffic; local streets are intended to serve neighborhoods. I respectfully ask that this project operate in a way that reflects that policy.

This request does not change the project's entitlements. It simply ensures that operational impacts are managed responsibly and consistent with the surrounding context.

Thank you for your consideration.

Sincerely,

Planning CPC <cpc@lacity.org>

CPC-2025-1087-DB-VHCA – 4201 Pico Blvd. Operational Management Request

Sally Boldt <sboldt@mac.com> Mon, Feb 23, 2026 at 9:38 PM
To: cpc@lacity.org

Dear Commissioners,

I am writing regarding the proposed eight-story, 220-unit mixed-use building at 4201 Pico.

I understand the project qualifies under State housing law. I am not asking to reduce height, density, or unit count.

I am respectfully requesting that the Commission require the applicant to submit, prior to issuance of a Certificate of Occupancy, a clear and enforceable Loading and Ride-Share Management Plan.

This plan should designate on-site, alley-accessed, or arterial-frontage loading areas sufficient to accommodate routine delivery, service, and ride-hail activity.

Victoria Avenue is a local residential street. It should remain limited to residential garage ingress and egress, and should not be relied upon for recurring commercial staging or loading activity.

A project of this scale will generate predictable delivery and ride-hail traffic. It is reasonable to require that the developer plan intentionally for where that activity will occur — whether through the Crenshaw alley, arterial frontage, or coordination with LADOT — rather than leaving it unmanaged.

This request does not alter project entitlements. It simply ensures that operational impacts are addressed responsibly and aligned with the surrounding street hierarchy.

Thank you for your consideration.

Sincerely,

Sally Boldt

Oxford Square resident

Planning CPC <cpc@lacity.org>

CPC-2025-1087-DB-VHCA-Support Condition

Suzi Click <suziclick@gmail.com> Mon, Feb 23, 2026 at 12:09 PM
To: cpc@lacity.org
Cc: David Lewis <dblsart@att.net>, mbfielder@gmail.com

As a 30 year resident of Oxford Square mid-city neighborhood I support directing commercial loading and ride-hail activity away from
Victoria Avenue and toward the Crenshaw alley or arterial streets.

Owning a home and living here for 30 years my husband and I have been very proud of the historically historic area and nice lifestyle
in the middle of the city but are afraid that it will change drastically and our quality of life will degrade with this new development so
want to support any way to make it less invasive.

Thanks,
Suzi Click and David B. Lewis
124 S. Windsor Blvd

Planning CPC <cpc@lacity.org>

CPC-2025-1087-DB-VHCA – Request for Condition of Approval

Sang (James) Park <sang@park-lawyers.com> Mon, Feb 23, 2026 at 11:21 PM
To: "cpc@lacity.org" <cpc@lacity.org>

Dear Commissioners,

My name is Sang Park, and I live on Victoria Avenue with my wife and our young son.

We understand this project is moving forward under State law. We are not asking you to shrink it or change its height.

What we are asking for is clarity about how it will function every day.

Victoria is a residential street. It is where children walk to visit friends, where families push strollers, where neighbors stop and talk. It is not a commercial corridor.

The current plans show a garage entrance on Victoria, but they do not show where ride-hail vehicles, food deliveries, courier vans, and other short-term commercial activity will be handled.

Without a clear operational plan, those vehicles will use the entrance that appears available. That would gradually shift daily commercial pickup activity onto Victoria.

There are practical ways to prevent that while allowing the project to proceed exactly as approved — for example, directing pickup and delivery activity to Crenshaw Boulevard, using the alley, providing a recessed drop-off space on the arterial frontage, or implementing routing and management measures.

We are not asking you to choose the design solution. We are asking you to require the outcome: that Victoria remain residential and that routine commercial activity occur on the streets designed to handle it.

As a parent raising a young child here, that distinction matters deeply.

Thank you for your consideration.

Sincerely,
Sang Park
Victoria Avenue

Planning CPC <cpc@lacity.org>

Please Protect Victoria Avenue from Commercial Pickup Activity – 4201 Pico

Taylor Newmark <taylornewmark@gmail.com> Tue, Feb 24, 2026 at 9:03 AM
To: "cpc@lacity.org" <cpc@lacity.org>

Dear Planning Commission,

My family has lived on Victoria Avenue for five years. We have young children, and Victoria is the street where they walk, ride bikes, and learn how to navigate the world safely.

We understand the need for housing and are not asking you to reduce units, change height, or challenge State housing law. We accept that resident garage access will be on Victoria.

What concerns us is the lack of a defined plan for ride-hail, food delivery, courier vans, and other commercial service activity. Without a clear operational condition, those vehicles will naturally use the Victoria entrance because it is the closest access point.

That would mean frequent pickups and drop-offs, vehicles stopping unpredictably, turning movements, and constant short-term activity along a residential block where children live and play.

We are simply asking that routine commercial loading and ride-share activity be directed to the Crenshaw alley or arterial frontage, not Victoria Avenue except for resident access. This does not reduce housing. It does not affect height. It only ensures that daily commercial activity is routed to streets designed to handle it.

As parents, predictability matters. A residential street should function as a residential street.

Please adopt the proposed **Loading and Ride-Share Management Plan condition**. Plus any other feasible measures to reduce traffic on our

residential street.

Thank you for your time and consideration.

Sincerely,

Taylor Newmark (818) 568 -3272

Victoria Ave

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ANDREW J. GRAF
TANYA A. GULESSERIAN
RACHAEL E. KOSS
AIDAN P. MARSHALL
ALAURA R. McGUIRE
ISABEL TAHIR

Of Counsel
DANIEL L. CARDOZO
MARC D. JOSEPH

February 23, 2026

Via Email
Los Angeles City Planning Commission
Email: cpc@lacity.org

Re: Agenda Item 7 – Stocker Street Creative Project (SCH No. 2025110100; Case Nos. ENV-2024-326-MND and CPC-2024-325-CU-MCUP-CUX-SPE-SPP-DRB-SPR-WDI)

Dear President Lawshe, Honorable Commissioners:

We are writing on behalf of Coalition for Responsible Equitable Economic Development Los Angeles ("CREED LA") regarding the Stocker Street Creative Project (SCH No. 2025110100; Case Nos. ENV-2024-326-MND and CPC-2024-325-CU-MCUP-CUX-SPE-SPP-DRB-SPR-WDI) ("Project") and proposed adoption of the Project's Mitigated Negative Declaration ("MND"). The Project will be considered as Agenda Item 7 at the February 26, 2026, City Planning Commission hearing.

CREED LA respectfully requests that the Commission continue this hearing and remand the Project to staff to prepare an environmental impact report ("EIR") to address the Project's significant, unmitigated air quality, public health, energy, noise, and public utilities impacts. CREED LA's review of the staff report demonstrates that the City has not yet complied with the California Environmental Quality Act ("CEQA") or applicable land use laws. The Commission may not consider approving the Project until the City has fully complied with applicable law.

CEQA requires an EIR, rather than an MND, be prepared when there is substantial evidence supporting a fair argument that the Project would result in significant impacts. CEQA provides: "[i]f there is disagreement among expert opinion supported by facts …. the Lead Agency shall treat the effect as significant and shall prepare an EIR."[1] CREED LA's comments on the Project's MND presented substantial evidence supporting a fair argument that the Project would result in significant and unmitigated air quality, public health, energy, noise, and public utilities impacts. The City is required to prepare an EIR for the Project.

The Commission Staff Report includes responses to CREED LA's comments, but the responses fail to resolve the issues raised in the comments. For example, the MND lacked a

[1] 14 Cal. Code Regs., § 15064(b), (g); *see Keep Our Mountains Quiet v. County of Santa Clara* (6th Dist. 2015) 236 Cal.App.4th 714.

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quantitative health risk analysis of impacts from exposure to the Project's construction emissions. CREED LA's air quality and public health consultant, Dr. Clark, prepared a health risk analysis which found that exposure to the Project's construction emissions would result in an incremental cancer risk of 13.4 in one million, in excess of the South Coast Air Quality Management District's ("SCAQMD") cancer risk threshold of 10 in one million. This is a significant impact which the MND failed to disclose. The Staff Report includes a new health risk analysis by the City which asserts that health risk is not significant. But Dr. Clark demonstrates that the City's analysis remains inaccurate and finds that, even under the City's calculations, the Project results in a significant health risk of 11.2 in one million.[2] This is precisely the type of dispute between experts which requires an EIR under the fair argument standard.[3]

Further, the MND's conclusion that the Project's hazardous materials impacts would be less than significant remains unsupported. CREED LA previously commented that the MND violated CEQA by failing to analyze the site for soil contamination (either in a Phase I or II environmental site assessment ("ESA")). The Staff Report responds that "a Phase 1 Environmental Site Assessment for the project site was prepared on January 5, 2021. The Phase 1 ESA was not included in the IS/MND, although it was and is available for review in the City files."[5] The Staff Report then asserts that "[t]he detailed Phase 1 ESA does not identify significant hazardous conditions.... The less-than-significant conclusion within the Hazard and Hazardous Materials section of the IS/MND remains accurate."[6] However, the Staff Report fails to attach the Phase I report and the City has not provided it in response to CREED LA's requests. This reliance on a hidden study violates both CEQA and the Public Records Act.[7]

The courts are clear that a CEQA document may not rely on hidden studies or documents that are not provided to the public.[8] The failure to provide even a few pages of a CEQA documents for a portion of the CEQA review period invalidates the entire CEQA process, and such a failure must be remedied by permitting additional public comment.[9] Thus, if the City intends to rely on a Phase I ESA to support a no-impact conclusion, the ESA must be attached to a Draft EIR and circulated for public comment with the environmental document. The City failed to do that here. Moreover, the City failed to provide access to the Phase I ESA in response to

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[2] Clark Comments, p. 2.
[3] 14 Cal. Code Regs. § 15064(f)(1); *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 934-935, 938 ('opposing views are substantial evidence going the other way, which is insufficient to refute the claim of a fair argument').
[5] Staff Report, PDF pg. 1995.
[66] *Id.*
[7] *Santiago County Water District v. County of Orange* (1981) 118 Cal.App.3rd 818, 831 ("Whatever is required to be considered in a [CEQA document] must be in that formal report; what any official might have known from other writings or oral presentations cannot supply what is lacking in the report."); Government Code §§ 7920.000.
[8] *Id.*
[9] *Ultramar v. South Coast Air Quality Man. Dist.* (1993) 17 Cal.App.4th 689, 699.

CREED LA's record requests of November 24, 2025, and January 30, 2026. The City's failure to make the record available violates the Public Records Act.[10]

CREED LA respectfully requests that the Commission continue this hearing and remand the Project back to staff so that an EIR can be prepared in compliance with CEQA.

A. Health Risk Impacts Remain Significant and Unmitigated

Dr. Clark's initial health risk analysis demonstrates that the Project's construction would result in a significant health risk impact (incremental cancer risk of 13.4 in one million) on residences located next to the Project site. In response, the City prepared its own analysis finding a cancer risk of 9.6 in one million.[11] Dr. Clark reviewed the City's analysis and identified flaws. Dr. Clark then recalculated health risk using the same emissions data used by the City and found that, even under the City's framework, the Project still results in a cancer risk of 11.2 in a million.[12] This exceeds the SCAQMD health risk threshold of 10/million, resulting in a significant impact that the City failed to disclose. This disagreement between experts requires preparation of an EIR under the fair argument standard.[13]

Dr. Clark further explains that the City's HRA is unsupported because it assumes the use of Tier 4 construction equipment. Tier 4 is the most stringent emissions control level for off-road sector construction engines.[14] Its use is being phased in by CARB regulations, but is not yet required for all construction.[15] The MND lacks any binding condition requiring Tier 4 construction equipment for the Project. The Staff Report states that the Applicant's commitment to meet LEED Gold standards would require use of Tier 4 construction equipment.[16] However, this is incorrect because LEED Gold does not require use of Tier 4 construction equipment. A Project meets LEED Gold standards by implementing features, each associated with a certain amount of points, that add up to 60-79 points. Use of Tier 4 equipment is not a prerequisite on the LEED v4 and v5 checklists to achieve LEED Gold certification.[17]

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[10] Government Code §§ 7922.000, 7922.525, 7922.530; *see Sukumar v. City of San Diego* (4th Dist. 2017), 14 Cal.App.5th 451 (an agency's "inability or unwillingness to locate and produce" requested records "is tantamount to withholding requested information" under the Act).
[11] CEQA Guidelines § 15126.4(a)(2).
[12] Clark Comments, p. 2.
[13] 14 Cal. Code Regs., § 15064(b), (g); *see Keep Our Mountains Quiet v. County of Santa Clara* (6th Dist. 2015) 236 Cal.App.4th 714.
[14] See https://ww2.arb.ca.gov/resources/fact-sheets/fact-sheet-added-vehicle-restrictions-and-tier-phase-out-requirements.
[15] *Id*.
[16] Staff Report, PDF pg. 1987.
[17] LEED v5 checklist available at https://build.usgbc.org/leed-v5-scorecard-bdc-nc; v4 checklist available at https://build.usgbc.org/l/413862/2019-01-16/ndzk5h/413862/152746/LEED_v4_for_Building_Design_and_Construction__1_PAGE.xlsx.

The City's argument is also legally unsupported because CEQA requires mitigation measures to be fully enforceable through permit conditions, agreements or other legally binding instruments.[18] A statement in the staff report that use of Tier 4 equipment is encompassed in LEED Gold certification does not meet these standards. Because cancer risk estimated in the City's HRA is just below the 10 in one million threshold even with Tier 4 equipment, cancer risks would certainly exceed 10 in one million without a binding requirement to use Tier 4 equipment. The Project's significant health risk impacts must be mitigated in an EIR.

B. The MND's Energy Analysis Still Fails to Analyze Sound Stage Production Uses

The MND concluded that energy impacts would be less than significant, despite failing to quantify the Project's energy consumption, discuss energy-intensive uses of the proposed Project, or consider measures to reduce energy consumption. CREED LA's comments on the MND demonstrate that the Project's energy impacts would be potentially significant due to specialized lighting, specialized A/V equipment, cooling for heat-generating gear, and significant transportation/fuel use typical of sound stage production projects. CREED LA further commented that the generic CalEEMod land use categories relied upon in the MND's air study underestimated the project's expected energy consumption, criteria air pollutant emissions, and GHG emissions.

In Response 4e, the Staff Report responds that the generic land uses reasonably estimated the Project's effects. This response is conclusory, as the Staff Report fails to actually demonstrate how the selected land uses reflect the impacts of sound stage production. In Response 4h, the City states that LEED Gold certification alone ensures that energy impacts would be less than significant. This response is unsupported because the Staff Report fails to discuss energy consumption of sound stage production and demonstrate that LEED measures would meaningfully reduce energy consumption of those uses. Response 4h further states that "as more details of project design became available, project specific energy calculations were undertaken," shown in Table B of the Staff Report.[19] However, these new details are not disclosed, and the modeling files apparently rely on the generic CalEEMod "Office Park" land use.[20] There is no evidence in the record demonstrating that sound stage-specific energy consumption is reflected in this estimate. Thus, the energy analysis remains inadequate.

C. Impacts from Disturbance of Hazardous Materials Remain Potentially Significant

The City cannot rely on a Phase I ESA that has not been disclosed to the public to support the MND's conclusion that hazardous materials impacts are less than significant. The ESA was not referenced in the MND, and has not been made available in response to record requests.[21] As

[18] CEQA Guidelines § 15126.4(a)(2).
[19] Staff Report, PDF pg. 1993, 1994.
[20] PDF pg. 1957.
[21] Staff Report, PDF pg. 1995.

explained in CREED LA's prior comments, the MND only included a review of the EnviroStor database and Geotracker database. These databases indicate if a site was previously subject to regulatory cleanup for contamination, but do not demonstrate that a site is free of soil contamination or other hazardous materials that may cause significant impacts if disturbed.

There is also no evidence that the Phase I ESA was provided to the Commission, or that the Commission has reviewed the ESA. Thus, the Commission cannot find that the MND's conclusion is supported by substantial evidence.

D. Public Utilities Impacts Remain Unanalyzed and Potentially Significant

CREED LA previously commented that the MND lacked analysis of necessary public utilities improvements. CREED LA explained that the MND failed to analyze whether any new wastewater infrastructure would be required for the Project. The MND also failed to disclose the fire flow requirements for the Project, failed to analyze whether that fire flow would be met by existing infrastructure, and failed to disclose environmental impacts resulting from construction of any necessary improvements. Quantitative analysis of whether water mains would need to be upsized is contained in an Information of Fire Flow Availability Request ("IFFAR").

The Staff Report responds, without support, that no off-site utility improvements would be required besides installation of underground electrical service. Unsupported conclusions are not substantial evidence. The City must prepare an IFFAR to analyze fire flow and meaningfully address whether additional wastewater infrastructure is required for the Project.

E. Conclusion

CREED LA respectfully urges the CPC to continue the public hearing and direct Staff to prepare an EIR that fully discloses, analyzes, and mitigates the Project's significant impacts, as required by CEQA.

Sincerely,

Aidan P. Marshall

APM:

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Attn: Mr. Aidan Marshall
Subject: Comments On Los Angeles Department of City Planning Recommendation Report For Stocker Street Creative Initial Study, Case Number: ENV-2024-326-MND

At the request of Adams Broadwell Joseph & Cardozo (ABJC), Clark and Associates (Clark) has reviewed the materials related to the City of Los Angeles' (the City) Department of City Planning, Recommendation Report (Staff Report) for the above-referenced project. Clark's review does not constitute validation or endorsement of the conclusions or content presented in the IS/MND. Any lack of comment on specific items should not be interpreted as acceptance or approval of those items. The facts presented in this comment letter lead me to reasonably conclude that the Project continues to result in significant, unmitigated impacts if allowed to proceed as envisioned in the IS/MND and Staff Report. An environmental impact report (EIR) is necessary to address these substantial concerns fully and transparently.

1. **The MND's Revised Energy Analysis Still Does Not Evaluate Sound Stage Production Uses**

In Response 4e, the City states that the Project's energy consumption was correctly analyzed using CalEEMod land uses such as manufacturing, arena, general office building, office park, high-turnover sit-down restaurant, strip mall, unenclosed parking with elevator, and other non-asphalt surfaces. The Staff Report further claims that "the Applicant prepared energy consumption modeling for the specific uses proposed on the site (i.e., studio and mill shop)." These claims are unsupported.

Specifically, Table 3B of the Staff Report's CalEEMod analysis estimates the Project's operational energy demands. (PDF pg. 1993). A review of the modeling files shows that these estimates rely on the CalEEMod "Office Park" land use. (PDF pg. 1957). There is no evidence in the record demonstrating that the energy demands of sound stage production uses, which require intensive lighting, specialized A/V equipment, and cooling for heat-generating gear, are reflected in this estimate. The energy demands of these uses are discussed in greater detail in CREED LA's prior comments. The Staff Report's statement that "the Applicant prepared energy consumption modeling for the specific uses proposed on the site (i.e., studio and mill shop)" remains unsupported, as there is no evidence that these are reflected in the CalEEMod "Office Park" land use. Thus, the Office Park land use code would underestimate the potential energy use of the Project. The City must prepare an EIR to accurately assess the energy use of the Project.

2. **Our Initial Health Risk Assessment Showing Significant Impacts Still Accurately Describes the Project If The Mitigation Measures For Reducing DPM Are Not Imposed**

My previous comments on the IS/MND included a health risk assessment (HRA) demonstrating that the Project construction phase would result in an incremental cancer risk of 13.4 in one million to the most sensitive receptors near the Project site over a 27.5-month period of construction activities.

This model was based on the City's air quality analysis that showed a total of 678 pounds of DPM being emitted over 600 days or a daily emission rate of 512.56 grams of DPM per day.

The Staff Report now states that Project construction is anticipated to begin in the second or third quarter of 2026 and last for approximately 35 months, and that Tier 4 construction equipment would be used. The air quality modeling from the City calculated that the total emissions of DPM during the duration of the construction would now be approximately 0.17 pounds per day over a 760-day period or a total of 128.456 lbs of DPM (pg 1689 of Staff Report). As I show below, this amount still results in a risk to the residents that is greater than 10 in 1,000,000 when the appropriate exposure factors are utilized. The City must revise its HRA and present the results in an EIR for the Project.

3. **Comment On Response 4b: the City's New Health Risk Assessment Underestimates Potentially Significant Impacts**

In Response 4b the City states that "a new health risk assessment (HRA) was prepared to address detailed project-specific construction information and updated schedule." The assumptions included in the HRA include the use of Tier 4 rated offroad construction equipment to reduce diesel particulate (DPM) emissions. The footnote to the response states that the Air Quality and Energy Calculations were provided as an attachment to the document. The analysis in question starts on page 1687 of the pdf.

The maximum modeled annual diesel PM concentration was 0.03115 micrograms per cubic meter ($\mu g/m^3$) at the multifamily complex adjacent to the northern site boundary.[1] The construction HRA was prepared using the 0.03115 ug/m^3 concentration, assumed an exposure duration of 35 months, and calculated the cancer risk for infants, children, and adults. The City calculated a risk of 9.6 in one million, just below the SCAQMD significance threshold.

To achieve that cancer risk the City chose exposure frequency parameters that limited the residents exposures to diesel particulate matter (DPM). They limited the exposure of the receptors to 85 percent of the time (frequency at home or FAH set to 0.85 for infants and 0.72 for children). This means that their analysis assumed that no resident could stay at their residence 100 percent of the time. In effect their analysis requires that residents leave their homes during the construction phase of the Project. This would mean that residents would have to leave their residences from 3.6 to 6.72 hours per day during the period of the construction activities.

OEHHA recommends the following FAH values: from the third trimester to age <2 years, 85 percent of time is spent at home; from age 2 through <16 years, 72 percent of time is spent at home; from age 16 years and greater, 73 percent of time is spent at home.[2] The City's analysis fails to consider the note on page 8-5 of the Toxic Hot Spots manual, in which OEHHA states that Facilities with any school within the 1×10^{-6} (or greater) isopleth should use FAH = 1 for the child age groups (3rd Trimester, 0<2 years, and 2<16 years). This is due to the fact that young child may live and go to school in areas that are very close to each other. The nearest sensitive receptors to the Project Site include residences across Stocker Avenue, approximately 100 feet (30 meters) from the Project Site

[1] Staff Report page 1689 of pdf.

[2] Ibid. pg 40

as well as residents in the apartment building on the northern edge of the Project Site. Additionally, Stella Elementary Charter Academy and Escuela Plus Elementary School are located approximately 920 feet northwest, and Brea Sports Park are located approximately 875 feet (267 meters) north for the Project Site.

According to the dispersion modeling performed by the City the airborne concentration of DPM from the Project's construction hitting the schools would be approximately 0.003 ug/m3, which would cause a 1 in 1,000,000 risk for residents at that location. Given the proximity of both sites which contain sensitive receptors it is clear the appropriate FAH for infants and children is 1, not the values chosen by the City.

Using the City's own air quality analysis I have recalculated the cancer risk to the MEIR, assuming that residents could be present during all of the construction activities (the most conservative approach and found that the cancer risk to the most sensitive population, infants and children, is 11.2 in one million, much greater than the 10 in 1,000,000 significance threshold outlined by SCAQMD, resulting in a significant impact–even with the use of Tier 4 off-road construction equipment. The results of the health risk analysis are attached as an appendix to this letter. The City must disclose these significant impacts in an EIR for the Project

4. **Comment On Response 4d. The CalEEMod Now Includes Two Back-Up Generators But Still Underestimates Emissions from Stationary Equipment.**

The City has redone the CalEEMOD analysis for the operational phase of the Project and included two 405 horsepower backup generators assumed to be operated (tested) bimonthly for a total of 24 hours each of operation per year. The Staff Report states that these assumptions reflect bimonthly testing of the generators.

Stocker Street Creative Campus Detailed Report, 1/28/2026

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
Emergency Generator	Diesel	2.00000	4.00000	24.0000	405.000	0.73000

5.16.2. Process Boilers

But the City's assumptions regarding the number of generators required and the amount of time they would be used do not appear to be supported. The MND anticipates that Project operations would include regular use of studio trailers.[3] Studio trailers and other "basecamp" operations often use diesel generators.[4] This use is not reflected in the Staff Report's analysis. Additionally, the analysis does not include the necessary fire pumps that will be required to ensure adequate protection of the building. The City's analysis is therefore incomplete and must be corrected in an EIR for the Project.

[3] MND, pg. 21 ("Parking for studio trailers or "star wagons" that would function as dressing rooms or "green rooms" would be located adjacent to the northeast corner of Building D").

[4] https://planning.lacity.gov/eir/Radford%20Studio%20Center/deir/files/App_D.pdf, pg. 10;

Conclusion

The facts presented in this comment letter lead me to reasonably conclude that the Project could result in significant impacts. An EIR is necessary to address these substantial concerns fully and transparently.

Sincerely,



Risk Calculations For Diesel Exhaust

$Risk_{inh\text{-}res} = Dose_{air} * CPF * ASF * ED/AT$

$Dose_{air} = C_{air} * \{BR/BW\} * A * EF * 10^{-6}$

Variable	Description	Units	Value
$Risk_{inh\text{-}air}$	Residential inhalation cancer risk	Unitless	Calculated
$Dose_{air}$	Daily inhalation dose	mg/kg-day	Calculated
CPF	Inhalation cancer potency factor	$(mg/kg\text{-}day)^{-1}$	Chemical Specific
ASF	Age sensitivity factor for a specified age group	Unitless	Calculated
ED	Exposure duration (in years) for a specified age group	years	Calculated
AT	Averaging time for lifetime caner risk	years	70
FAH	Fraction of time spent at home	Unitless	Calculated

Variable	Description	Units	Value
$Dose_{air}$	Daily inhalation dose	mg/kg-day	Calculated
C_{air}	Concentration in air	ug/m^3	**0.03115**
{BR/BW}	Daily Breathing rate normalized to body weight	L/kg body weight-day	Calculated
A	Inhalation absorption fraction	Unitless	1
EF	Exposure frequency (days/365 days)	Unitless	Calculated
10^{-6}	migrograms to milligrams conversion, liters to cubic meters conversion	Unitless	Calculated

2.02E+06

Residential Exposures

Age Group	Risk (per million)	Age Sensitivity	FAH	ED	CPF	Dose Air	Cair	BR/BW	A	EF
3rd Trimester	4.24E-01	10	1	0.25	1.1	1.08E-05	0.031	361	1	0.958904
0-1	5.12E+00	10	1	1	1.1	3.26E-05	0.031	1090	1	0.958904
1-2	5.12E+00	10	1	1	1.1	3.26E-05	0.031	1090	1	0.958904
2-3	5.40E-01	3	1	0.67	1.1	1.71E-05	0.031	572	1	0.958904
3-4	0.00E+00	3	1	0	1.1	1.71E-05	0.031	572	1	0.958904
2<9	0.00E+00	3	0.72	0	1.1	2.57E-05	0.031	861	1	0.958904
2<16	0.00E+00	3	0.72	0	1.1	2.23E-05	0.031	745	1	0.958904
16<30	0.00E+00	1	0.73	0	1.1	1.00E-05	0.031	335	1	0.958904
16-70	0.00E+00	1	0.73	0	1.1	8.66E-06	0.031	290	1	0.958904

3rd trimeseter to 1.	11.20
3rd trimester to 30	5.54
3rd trimester to 70	**11.20**

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February 23, 2026

VIA E-MAIL

President Lawshe and Members of the
City Planning Commission
Los Angeles City Hall
200 N. Spring Street
Los Angeles, CA 90012
Attn: Cecilia Lamas, Commission Exec. Asst. II
cpc@lacity.org

Re: 3701 – 3761 Stocker Street
CPC-2024-325-CU-MCUP-CUX-SPP-DRB-SPR-WDI
ENV-2024-326-MND
Hearing Date: February 26, 2026

Dear President Lawshe and Members of the City Planning Commission:

We represent 3731-41 Stocker Opportunity LLC 3751-3761 and Stocker Traditional LLC (collectively, "Stocker"), the Owner and Applicant of the proposed mixed-use LEED® Gold[1] Project at above-referenced Property. Stocker has worked hard to earn the overwhelming support of Project from the Baldwin Hills community and its Neighborhood Council, as well as support from trade unions, and hopes to revitalize an under-used site and provide current, cutting-edge jobs to the community.

The comments provided by the Coalition for Responsible Equitable Economic Development ("CREED LA") in its letter dated December 8, 2025 are unfounded, fail to provide evidence supporting a fair argument of a significant impact, and represent nothing more than a special interest group attempting to extort concessions from Stocker at the expense of the community. In an unsuccessful attempt to create an impression the mitigated negative declaration ("MND") for the Project is somehow inadequate, the appeal provides a smattering of generally unsupported claims regarding potential impacts and the use of allegedly improper or outdated methods or assumptions. As described in detail in the technical reports and responses provided to the Department of City Planning ("DCP") and incorporated here, no substantial evidence in the record that demonstrates a significant

[1] Leadership in Energy and Environmental Design. Among other things, LEED Gold projects must include water and energy efficiency, waste reduction, and transportation demand management features. Certain features apply to construction as well as operation.

impact could occur. As these and the prior responses[2] demonstrate, the MND is proper for the Project, and the City Planning Commission (the "Commission") should adopt the MND and approve the Project.

1. The MND Relied upon but Did Not Require a Phase I Environmental Site Assessment for the Property, Contrary to CREED LA.

The CREED LA letter asserts the baseline and analysis in the MND of hazardous materials are unsupported because the MND does not include a Phase I or Phase II environmental site assessment ("ESA") for the Property. This claim is simply wrong: the MND relied upon the Phase I ESA included in the City's administrative record. Because this claim lacks a factual basis, it necessarily fails.

(a) CREED LA's Speculative Request for Additional Study Does Not Constitute Substantial Evidence of an Environmental Effect.

The California Court of Appeal rejected CREED LA's line of argument more than a decade ago. In *Parker Shattuck Neighbors v. Berkeley City Council*, 222 Cal. App. 4th 768 (2013), project opponents asserted the need for a vapor intrusion study based on the potential presence of volatile organic compounds in soils on the subject property, and asserted the lack of a study provided evidence of a fair argument of an environmental impact. The Court rejected this argument and determined that the mere suggestion for further study does not constitute evidence of an environmental effect. This is consistent with CEQA's definition of substantial evidence, which excludes "argument, speculation, unsubstantiated opinion or narrative [and] evidence that is clearly inaccurate or erroneous." Cal. Pub. Res. Code §21080(e). As in *Parker Shattuck*, the CREED LA letter recommends investigation without affirmatively opining—as it cannot—that a significant impact would occur in its absence. This assertion is not evidence, let alone substantial evidence, of any potential environmental effect, particularly when weighed against the substantial evidence in the record upon which the MND based its conclusions.

CREED LA's speculation regarding historic uses of the site by medical and dental offices fares no better. In comparison to the detailed database review prepared for the Property, CREED LA hypothesizes that prior medical uses may have included the use of hazardous substances on-site, and that the MND failed to evaluate the potential for such use. Here again, calls for additional study do not constitute substantial evidence under *Parker Shattuck*, *supra*. CREED LA's argument also fails under *Covina Residents for Responsible Development v. City of Covina*, 21 Cal. App. 5th 712 (2018), in which the Court rejected a challenge to an MND that rested on, among other issues, speculation that residents would exceed occupancy standards and generate increased parking demand beyond what City

[2] Responses to comments are not required for an MND as they are for an EIR. Nevertheless, to provide the maximum disclosure and information, the record includes responses to comments received.

Codes and the MND assumed. The Court affirmed, consistent with prior case law, that "speculation about possible violations does not constitute substantial evidence of a significant impact." Here, as in *Covina Residents*, CREED LA simply assumes the prior use and inappropriate or illegal disposal of hazardous materials created conditions on the Property that could result in significant environmental effects. This assumption fails to constitute substantial evidence of anything; further, the Phase I ESA prepared for the Property accounted for this prior use and included inspections of the Property specifically to determine whether signs of such inappropriate or illegal activity, or prior releases of any hazardous materials, were present. On the basis of the database searches, information sought from knowledgeable parties regarding the Property, and direct physical inspection—all forms of substantial evidence—the Phase I ESA properly concluded no significant impact regarding hazardous materials would result from the Project. CREED LA's assertions do nothing to substantiate any attack on the MND's findings.

(b) The Phase I ESA Prepared for the Property Concluded No Need for Additional Study of Hazardous Materials.

As stated above, the record includes a Phase I ESA for the Property. It found "no evidence of environmental concerns." This specifically included vapor intrusion, for which the report concluded "no further action to investigate or mitigate the potential vapor intrusion pathway is warranted." Thus, the Phase I ESA concluded that significant hazards were present on the Property and no need existed for invasive testing as part of a Phase II ESA. The CREED LA letter provides only assertions, and not substantial evidence, to the contrary. This does not satisfy the "fair argument" standard, and the MND analysis remains valid and factually supported.

(c) An Existing and Robust Regulatory Process Governs Asbestos and Lead-Based Paint Removal in Any Case.

CREED LA neglected the record and relied on the asserted ***potential*** presence of asbestos, lead-based paint, and vapor intrusion risk associated with polychlorinated biphenyls ("PCBs") for the claimed need for a Phase I ESA and the resulting impact conclusion. However, these materials—if present—represent existing conditions. The Project would not increase the amount of any of these materials and would, in fact, reduce or eliminate them from the Property over the course of redevelopment.

To the extent the Project would remove these materials from the Property, existing regulations and permitting requirements already provide the methods and safeguards for doing so. Specifically, City and South Coast Air Quality Management District ("SCAQMD") rules and policies require pre-demolition inspection for asbestos and, if these materials are found, abatement by licensed contractors prior to demolition of the structure as a whole. Rule 1403 also specifies worker qualifications and work practices. Regarding asbestos and lead-based paint, Occupational Safety and Health Administration ("OSHA") regulations include requirements for training and certification, as well as site preparation and specific

work practices to prevent, limit, and contain emissions, and to monitor exposure of workers. (29 CFR §§1926.62 [lead-based paint] and 1926.1101 [asbestos].) These regulations would apply before and during any demolition that would occur as part of the Project. Additionally, as provided in Los Angeles Department of Building & Safety ("DBS") Information Bulletins P/BC 2026-067 and P/BC 2026-039[3], demolition permits cannot be issued without proof of asbestos notification to the U.S. Environmental Protection Agency unless otherwise exempt, and demolition pre-inspection is required and includes necessary abatement of asbestos, consistent with SCAQMD Rule 1403.[4] For all of these, reasons, compliance with applicable standards and regulations would ensure worker and public safety, and no substantial evidence indicates a significant impact would occur.

(d) CREED LA's Requested Vapor Intrusion Analysis Constitutes "CEQA in Reverse," and is Not Cognizable.

In addition to the speculative nature of CREED LA's argument for a vapor intrusion analysis, such an analysis would not concern the effect of the Project on the environment. Rather, it demands evaluation of the environment on the Project.

2. The Project would Not Result in Significant Impacts to Air Quality or Human Health Risk.

The CREED LA letter asserts construction of the Project would result in toxic air contaminant ("TAC") emissions that would exceed certain health risk thresholds, and challenged the MND's use of localized significance thresholds ("LSTs") in its air quality analysis. However, CREED LA's purported analysis mischaracterizes certain aspects of the Project and fails to account for Project features that significantly reduce air emissions during all phases. These failures render the attack erroneous and deprive it of evidentiary support. Further, a health risk assessment ("HRA") was prepared for the Project and included in the record, and accounting for these key Project design features results in emissions and health risk below thresholds.

(a) The Project is Designed to Meet LEED Gold Standards, and CREED LA's Purported HRA Fails to Account for This.

Stocker proposes the Project to meet the LEED Gold standard and achieve certification. Accordingly, and consistent with the Project's design, Stocker would accept a condition of approval to so construct and operate the Project. Among other features, LEED Gold projects use paints, adhesives, sealants, and furnishings that are low in volatile organic compounds ("VOCs"), use of recycled, renewable, and low-emissions building materials, use of construction vehicles with Environmental Protection Agency ("EPA") Tier IV-rated engines,

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[3] Previously issued as 2023-067 and 2023-039 , respectively.
[4] *See also* https://dbs.lacity.gov/services/getting-started/asbestos-hazards. Last accessed February 16, 2026.

and use of clean fuels and/or electrified equipment where feasible. Accordingly, the Project would employ these features as part of its design.

In *Newtown Preservation Society v. County of El Dorado*, 65 Cal. App. 5th 771 (2021), opponents of a bridge replacement project sought to challenge the County's adoption of an MND. They retained a purported expert—a retired firefighter—to substantiate claims of potential impacts regarding fire safety and wildfire evacuation routes. However, the expert's opinion did not address the project or conditions as they existed; rather, they focused on one evacuation route and failed to account for other available routes available to the project and nearby residents through project design features and mitigation measures. That failure, the Court found, deprived the purported expert analysis of a factual foundation for its conclusions and rendered those conclusions speculative. 65 Cal. App. 5th at 789 – 90.

Here, as in *Newtown*, the HRA provided by CREED LA does not account for Project features that are essential for an accurate conclusion regarding the Project's effects. Just as the *Newtown* fire expert failed to account for project features and/or mitigation measures regarding evacuation routes when evaluating fire impacts, the CREED LA HRA simply assumes a typical development with no noted sustainability or energy efficiency features including—and most relevant to construction air quality—the use of Tier IV construction vehicles. Consequently, and as with the expert opinion in *Newtown*, these crucial omissions regarding the Project resulted in an inaccurate and speculative analysis that substantially project impacts—in this case, the health effects of construction emissions.

(b) The HRA Prepared for the Project Concluded No Significant and Unavoidable Health Risk Impacts Would Occur.

The HRA for the Project was prepared in response to comments received on the MND and was previously provided to the City. It includes refined Project information, including a LEED Gold development; mapped nearby sensitive receptors to determine the maximally exposed individual receptor ("MEIR") for the purpose of accurately determining health risk; and accounted for the potential presence of pregnancies, infants, and children in these MEIRs. As shown in the HRA (Table A), the maximum cancer risk for the Project—assuming a third trimester pregnancy in a nearby building—is 9.6 per one million, or below the threshold of 10 per one million. That is, the Project would not result in significant and unavoidable health risk impacts.

3. The CREED LA Letter Fails to Provide Substantial Evidence of a Significant and Unavoidable Air Quality Impact.

The CREED LA letter includes several assertions of potentially significant air quality impacts. However, these assertions generally relate to the hypothetical additional emissions from various project components, as well as the proposed use of different modeling assumptions. These assertions range from irrelevant to erroneous, and do not provide substantial evidence of a significant and unavoidable air quality impact.

(a) CREED LA's Assertions Regarding Project Operational Emissions Ignore the Data the MND Relied Upon Regarding Project Uses.

In an attempt to mislead the City, the CREED LA comments regarding the land uses modeled for the air quality analysis in the MND. Briefly, and as described in previous responses to comments, the letter cited two land uses that appear superficially different from the Project. However, the letter ignored or failed to disclose the six additional land uses—including manufacturing, arena, office building and office park, restaurants, and parking—that correspond to the uses included in the Project Description from the MND.

In *Jensen v. City of Santa Rosa*, 23 Cal. App. 5th 877 (2018), an opposition noise analysis purported to show significant impacts associated with a transitional housing center. Among other defects with the report, the Court found the data were borrowed from an incomparable project. These erroneous modeling assumptions deprived the resulting analysis of any evidentiary value regarding the potential noise impacts of the project.

Here, the CREED LA simply ignored the majority of the analytical assumptions regarding the proposed land uses and their inputs into the air quality model for the Project. Instead, the letter relied on limited, cherry-picked data. As in Jensen, in which deprives the comments regarding air quality modeling of substantial evidentiary support.

(b) The Air Quality Analysis Accounted for Backup Generators, and No Significant Impacts Would Occur.

The CREED LA letter asserted the operational air quality analysis failed to account for backup generators the Project could foreseeably (according to the letter) use in the event of power outages. However, as discussed above, the Court in *Parker Shattuck, supra*, held that the mere suggestion for further study does not constitute evidence of an environmental effect. As in *Parker Shattuck*, the CREED LA letter recommends additional air quality modeling without affirmatively substantiating a significant impact would occur without that analysis. This assertion is not evidence, let alone substantial evidence, of any potential environmental effect, particularly when weighed against the substantial evidence in the record upon which the MND based its conclusions.

Nevertheless, the updated air quality analysis prepared for the Project and submitted to the City included more refined assumptions. These included periodic operation of the proposed backup generators for testing purposes. The updated results assumed bimonthly testing of the generators, because extended use of generators is not foreseeable and could not exceed 200 hours per year under SCAQMD regulations. However, even with these additional emissions, criteria air pollutants remain below the thresholds of significance, and no significant operational air quality impact would occur. Consequently, the letter fails to provide any evidence of a significant air quality impact resulting from any claimed omission of generator-related emissions.

4. No Significant and Unavoidable Construction Impacts Would Result from Off-Site Activities.

The CREED LA letter asserts the construction analysis does not account for construction activity within the public right-of-way of Stocker Street and Crenshaw Boulevard for utility installation and connection. However, use of limited construction equipment is possible given the narrow working area, and would generally be similar to discrete equipment such as concrete saw, backhoe, pickup truck, and forklift, which would result in minimal and localized emissions consistent with or reduced from those already disclosed in the MND for construction activities. Further, work would occur more than 70 feet from any of the mapped sensitive receptors disclosed in the MND. For this reason, construction-related noise would not exceed daytime noise standards, and emissions are not anticipated to exceed thresholds. Consequently, even with construction within public rights-of-way, construction would not result in a significant and unavoidable noise, air quality, or hazard impact, and the CREED LA letter does not provide substantial evidence to the contrary.

5. No Significant and Unavoidable Construction Noise Impacts Would Result, and No Mitigation is Required.

The CREED LA letter asserts that significant construction noise impacts may occur because certain construction vehicle noise assumptions are unclear with respect to whether they account for mufflers. Here, again, the letter does not substantiate that a significant impact could occur—only that additional study is necessary. Therefore, for the reasons described above, *Parker Shattuck* controls here, and no substantial evidence of a significant and unavoidable impact was provided.

Nevertheless, the refined noise analysis provided in response to comments actually makes clear that noise levels are reduced from those assumed in the MND. Further, where the MND concluded the need for mitigation measures to reduce impacts to less-than-significant levels, such measures are no longer necessary to reduce impacts to less-than-significant levels for residents to the south of the Property. Consequently, no significant and unavoidable construction noise impacts would occur, and the CREED LA letter fails to provide substantial evidence of any such impacts.

Further, as in *Newtown*, *supra*, the CREED LA letter does not account for Project features that are essential for an accurate conclusion regarding the Project's effects—including and particularly Tier IV construction vehicles. As with CREED LA's purported HRA, the CREED LA letter simply assumes a typical development with no noted sustainability or energy efficiency features including a newer fleet of construction vehicles and refined assumptions regarding needed construction equipment. Consequently, and as with the expert opinion in *Newtown*, these crucial omissions regarding the Project resulted in an inaccurate and speculative analysis that substantially project impacts—in this case, the noise effects of construction.

6. The Commission Retains Discretion Regarding Credibility of Experts and Whether Evidence is Substantial.

As the *Newtown, supra*, Court stated, even under the fair argument standard applied to MNDs, the Lead Agency (here, the Commission) retains discretion to determine whether evidence offered by opponents is credible. 65 Cal. App. 5th at 781. That is, the Commission decides whether CREED LA's inaccurate and speculative arguments constitute substantial evidence for the purpose of evaluating its claims regarding the potential impacts of the Project. Here, the failure to account for the Project's proposed LEED Gold certification and accompanying use of lower-emission construction vehicles destroys the credibility and evidentiary value of CREED LA's analysis. Therefore, it fails to substantiate its conclusions regarding the potential effects of the Project of human health. Consequently, the Commission can and should reject that analysis as unsupported by substantial evidence.

7. Stocker Would Accept a Condition of Approval that Reflects the Project Design Specification of LEED Gold.

As described above, Stocker proposes the Project as a LEED Gold development and will seek certification of the same. Accordingly, Stocker would accept a condition of approval that reads as follows, or the equivalent thereof:

> "Consistent with the Project design, the Project shall obtain LEED Gold certification."

Stocker appreciates the work of City staff to bring the Project to this point, and looks forward to working with the City to fully realize a development with broad community support that would, among other things, provide construction and operational job opportunities.

Sincerely,



BENJAMIN M. REZNIK and
NEILL E. BROWER of
Jeffer Mangels & Mitchell LLP

BMR:neb
cc: Hon. Marqueece Harris-Dawson, Councilmember, Dist. 8
(Councilmember.Harris-Dawson@lacity.org)
Adrienne Khorasanee (adrienne.khorasanee@lacity.org)

DAY OF HEARING SUBMISSIONS

Planning CPC <cpc@lacity.org>

CPC-2025-1087-DB-VHCA

amy chapman <amy.laurenc@gmail.com>
To: cpc@lacity.org

Tue, Feb 24, 2026 at 10:42 AM

Subject: CPC-2025-1087-DB-VHCA - Please Include a Clear Ride-Share and Delivery Condition – 4201 Pico

Dear Members of the Planning Commission,

My name is Amy Chapman, and I live on Windsor Blvd in Oxford Square. I support new housing and understand that this project is governed by State law. I am not asking for fewer units or changes to the building's height.

I am asking that you adopt the proposed condition of approval requiring a **Loading and Ride-Share Management Plan** that directs routine ride-hail, delivery, and commercial service activity to the Crenshaw alley or arterial frontage, rather than allowing it to operate from Victoria Avenue.

With a building of this size, daily pickup and delivery activity will be constant. App-based drivers and delivery services typically navigate to the most direct and visible entrance unless clearly instructed otherwise. In this case, that entrance is on Victoria.

If there is no defined routing plan, no designated staging location, and no operational safeguards, short-term stopping and pickup activity will occur along the residential frontage simply because it is the most convenient access point.

This condition does not alter the project's entitlements. It does not reduce housing. It simply ensures that commercial-intensity activity is directed to streets designed to handle it.

As a parent of two sons, I care about maintaining residential streets that function as residential streets. Thoughtful operations now will prevent preventable conflicts later.

Please include this condition of approval.

Thank you for your time and consideration.

Sincerely,

Amy Chapman

Windsor Blvd

Oxford Square

IRVINE
& ASSOCIATES, INC.

PHONE 213.437.3403
EMAIL Info@IrvineAssoc.com
WEBSITE www.Irvineassoc.com

TO: Los Angeles City Planning Commission February 26, 2026

RE: 4201 W Pico Boulevard – Case No. CPC-2025-1087-DB-VHCA

Honorable President and Members of the City Planning Commission:

Irvine & Associates, Inc. represents the Applicant for the above referenced Density Bonus Housing Development (the "Project"). We appreciate the public comments submitted by community members and the Neighborhood Councils, including requests focused on ensuring the Project functions safely and compatibly with adjacent residential streets.

The Project is a meaningful contribution to the City's housing goals, delivering new housing in an infill location along established commercial corridors with neighborhood serving retail. As reflected in the City's review, the Project is within the scope of the Housing Element program environmental review and will be subject to applicable mitigation measures and standard City conditions.

State law protections and limits on additional conditions

As a qualifying Density Bonus housing development, the Project is protected by the State Density Bonus Law and the Housing Accountability Act. Any additional conditions that materially modify the approved design, reduce the Project's housing yield, or impose requirements that render the Project infeasible must be supported by written findings and substantial evidence, including evidence of a specific adverse impact to public health or safety based on objective standards in effect at application completeness. (Gov. Code §§ 65915; 65589.5.)

HCD has repeatedly reinforced these limits in Technical Assistance guidance[1]. In their Technical Assistance letter to Mill Valley[2], HCD explained that jurisdictions must grant requested Density Bonus incentives, concessions, and waivers unless they can make the required written findings supported by substantial evidence, and that agencies may not redesign qualifying projects or impose conditions as a substitute for those findings. Accordingly, requested conditions should be considered only to the extent they are objective, enforceable, within the proper agency's jurisdiction, and supported by evidence establishing a public health or safety nexus.

Comments received and Applicant responses

1. Residential street traffic, queuing, and access operations

Concerns that garage access from Victoria Avenue could increase volumes on local streets, contribute to congestion near Pico and Victoria, and request traffic measures or turning restrictions due to perceived safety concerns.

The Project's access and circulation have been evaluated through LADOT's development review process and the traffic study, including analysis of local operations and potential queuing. The City's review reflects that additional design based restrictions can create secondary effects and that the preferred approach focuses on trip reduction and corridor operations, including Transportation Demand Management measures and ATSAC related signal coordination improvements that improve area wide progression and reduce conditions that contribute to localized delay.

[1] HCD Housing Accountability Act Advisory (September 2020)
[2] HCD Technical Assistance Letter, Blithedale Terrace Mixed Use Project (Mill Valley), November 2, 2022.

2. Loading, deliveries, ride share activity, and on street operations

Requests were made to direct ride share, guest pickup, deliveries, and courier activity away from residential streets, to provide designated pickup areas, and to restrict stopping along Victoria Avenue.

The Project includes an on site loading area accessed from the alley off Crenshaw Boulevard, and the Applicant expects deliveries and certain service functions to be internalized on site to the maximum extent feasible. Restrictions on how third party drivers use the public right of way are outside the Project's direct control and overlap with LADOT's jurisdiction to establish curb regulations and traffic controls. The Applicant is willing to implement operational management measures, tenant communications, and wayfinding that encourage use of on site loading and appropriate pickup locations, and to coordinate with LADOT and the Council Office if location specific issues arise.

3. Refuse, odors, noise, and service activity near the residential interface

Concerns were raised regarding trash, odor, noise, and service activity along Victoria, including requests that refuse be fully enclosed and that nuisance impacts be minimized.

The Applicant agrees with the objective of reducing nuisance impacts and confirms that refuse and recycling facilities are planned as enclosed rooms within the building and will comply with applicable municipal code requirements for collection hours and operational controls. The Project is also subject to the City's construction and operational noise framework and related mitigation measures where applicable.

4. Streetscape, trees, and neighborhood character

The Project will comply with adopted City standards for streetscape, Urban Forestry coordination, and landscaping requirements.

Volunteered Condition

Community correspondence reflects concerns regarding future ride share activity, loading, and other operational activity associated with the Project. Although the Project has been evaluated through the City's review process, the Applicant is committed to operating the Project in a manner that is sensitive to adjacent residential streets. The Applicant therefore offers the following condition for the Commission's consideration:

> The Applicant will make best efforts to work with Council District 10 and LADOT prior to initial occupancy to implement reasonable operational practices intended to minimize avoidable on street conflicts and nuisance impacts, including tenant communications and wayfinding related to ride share pickup and delivery activity, loading and refuse procedures, and a point of contact for the Council Office to elevate recurring operational concerns for review and coordination with the appropriate departments.

Conclusion

The Project delivers needed housing and neighborhood serving retail in an appropriate infill location and advances the City's adopted housing goals. For the reasons above, and consistent with State law protections applicable to qualifying housing developments, we respectfully request that the City Planning Commission approve the Project as recommended by City Planning staff.

Thank you for your consideration.

Jonathan Yang
Irvine & Associates, Inc.

Planning CPC <cpc@lacity.org>

Protecting Residential Safety on Victoria Avenue – 4201 W. Pico Boulevard

Alex Whitehead <alexrwhitehead@gmail.com> Wed, Feb 25, 2026 at 1:41 PM
To: cpc@lacity.org

Dear Commissioners,

My name is Alex Whitehead. My wife and I live on Victoria Avenue, very close to the proposed development at 4201 W. Pico Boulevard. We recently welcomed our baby son, Finneas, into our family.

We understand that housing is needed and that this project is moving forward under State law. We are not opposed to new neighbors. But because we live so close to the site, the way this building operates on a daily basis will directly affect our family and others on this block.

Victoria Avenue is a residential street. Families walk with strollers, children ride bikes, and neighbors rely on the street feeling predictable and calm. If ride-hail vehicles, delivery drivers, and service traffic are not clearly directed elsewhere, Victoria will naturally become a convenient pickup and drop-off location for a 220-unit mixed-use building.

An increase in short-term stopping, idling, and vehicle turnover may not seem significant in a staff report, but for families with young children — including ours — it changes how safe and livable the street feels every day.

We strongly support the operational safeguards requested by the Olympic Park Neighborhood Council, the Mid-City Neighborhood Council, and the Oxford Square Neighborhood Association — particularly a clear and enforceable management plan that directs recurring commercial activity to Pico Boulevard and Crenshaw Boulevard rather than onto Victoria Avenue.

With thoughtful conditions in place, it should be possible for new residents and existing families to coexist successfully. Without them, the burden will fall disproportionately on the households immediately adjacent to the project.

Thank you for your careful consideration.

Sincerely,
Alex Whitehead

Planning CPC <cpc@lacity.org>

CPC-2025-1087-DB-VHCA-SupportCondition

Brenda Ojini <ojinib@yahoo.com> Wed, Feb 25, 2026 at 10:21 PM
To: cpc@lacity.org

We have been a resident on Victoria Avenue for 31 years and we are asking that commercial loading and ride-hail activity to use the Crenshaw alley or arterial streets- not Victoria Avenue, to minimize the impact of the traffic relating to the proposed 220-Unit Building.

Thank you in advance for your consideration

And we are

Mr. & Mrs. Azuka, Brenda Ojini

Sent from Yahoo Mail for iPad

OXFORD SQUARE NEIGHBORHOOD ASSOCIATION
1235 SOUTH WINDSOR BOULEVARD, LOS ANGELES CALIFORNIA 90019

January 4, 2026

Department of City Planning
City of Los Angeles
200 N. Spring St., Room 763
Los Angeles, CA 90019
Attention: Esther Ahn, City Planner

Re: 4201 W Pico Boulevard — Case No. CPC-2025-1087-DB-VHCA ("Project")

Dear Ms Ahn,

Following the comments submitted for the record by Mary Beth Fielder and several other members of our association at the hearing before you on December 16, 2025, Oxford Square Neighborhood Association ("Oxford Square") would like to memorialize our requested mitigations to the Project and submit this letter for the record.

The Oxford Square neighborhood is a historic preservation overlay zone that lies immediately adjacent to the Project site, including South Victoria Avenue between Olympic and West Pico boulevards. While the 4200 block of West Pico is currently blighted and we are pleased to see residential-over-retail development occur, the size of the project (220 units) will more than double the number of residences potentially using Victoria Avenue (there are ~200 houses in all of our neighborhood). We are seeking reasonable measures to mitigate the additional vehicle trips on our streets.

We understand that primary resident vehicle access is proposed from Victoria Avenue and that new curb cuts on Pico Boulevard or Crenshaw Boulevard are not being pursued. Given this constraint, it is especially important that strong operational and traffic mitigation measures be required to ensure that Victoria Avenue does not function as a high-volume access and service corridor for a large development. We request the following conditions of approval:

1. Turning restrictions at the project driveway to minimize neighborhood circulation and discourage cut-through traffic
2. Operational controls to prevent queuing, staging, or spillback onto Victoria Avenue
3. Routing of all service and trash operations away from Victoria Avenue

4. Fully enclosed internal trash and recycling rooms
5. No curbside trash bin staging or pickup on Victoria Avenue
6. Daytime service hours only
7. Location of ride-hailing, guest pickup, and deliveries on Crenshaw Boulevard
8. Designated pickup/drop-off and courier delivery areas on Crenshaw Boulevard, consistent with the project's main entrance frontage
9. Prohibition of ride-hailing, food delivery, and package delivery stopping on Victoria Avenue
10. Clear signage and building management policies directing short-term stopping activity away from the residential street

These requests are intended to ensure that daily operational impacts are handled on appropriate arterial streets and through internal building design, rather than being shifted onto a residential block.

Thank you for considering these neighborhood-level mitigations as part of the project review.

Sincerely,

Chris Elwell
President

Cc: Hakeem Parke-Davis and Alan Antonio, Council District 10
Olympic Park Neighborhood Council

Feb 25, 2026

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

Re: Proposed Housing Development Project at 4201-4221 West Pico Boulevard
CPC-2025-1087-DB-VHCA

To: cpc@lacity.org;

Cc: esther.ahn@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 220-unit housing development project at 4201-4221 West Pico Boulevard, which includes 18 very low-income and 17 moderate-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 increase of the Floor Area Ratio, reduction in required open space, reduction in side yard setback, relief from Transitional Height requirements, and reduction in required planted trees. 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 pursuant to section 15168 of the CEQA Guidelines. 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.)

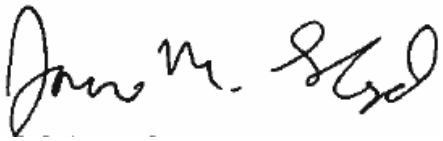
As you are well aware, California remains in the throes of a statewide crisis-level housing shortage. New housing such as this is a public benefit: by providing affordable housing, it will mitigate the state's homelessness crisis; it will increase the city's tax base; it will bring new customers to local 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

Planning CPC <cpc@lacity.org>

CPC-2025-1087-DB-VHCA

douglas fillin <fillind@gmail.com> Tue, Feb 24, 2026 at 1:34 PM
To: cpc@lacity.org

Dear Commissioners,

Residents of Oxford Square (Victoria Ave. and Windsor Blvd.) are not asking to stop the 4201 Pico project. We understand SB 35 and Density Bonus constraints. The problem has only been about its size - a smaller more neighborhood compatible project was recently built across the street from this proposed development - and the impact on parking and traffic on our residential streets. Especially in view of the LADOT proposed Pico Blvd Safety and Mobility Plan, which would reduce the number of lanes of through traffic starting at Crenshaw and on to Figueroa.

The single condition being requested is operational: require a Loading and Ride-Share Management Plan that directs routine commercial activity to Crenshaw or the alley, rather than Victoria Avenue - which already has parking space and cut through traffic issues.

We feel this is a narrow, reasonable compromise that preserves residential character while allowing the project to proceed as entitled.

I urge you to include this condition.

Respectfully,

Douglas Fillin

Planning CPC <cpc@lacity.org>

CPC-2025-1087-DB-VHCA – 4201 Pico

Jeremy Strauss <jstrauss44@gmail.com> Wed, Feb 25, 2026 at 4:08 PM
To: cpc@lacity.org

Dear Commissioners office,

I live at 1059 S Plymouth Blvd, Los Angeles, CA 90019 and I'm emailing about the planned development on 4201 Pico Blvd. I implore you to consider the opinions of those most impacted by this development, the residents who live in the adjacent neighborhood. We already see high incidences of people speeding through our neigihborhood cutting through to go north. This building, if not properly restricted, will make the traffic flow even more dangerous.

We ask that you specify to the developers that they need to:

- Require a Loading & Ride-Share Management Plan
- Direct routine delivery, Uber/Lyft, and service activity to the Crenshaw alley or arterial frontage
- Prevent routine commercial staging on Victoria (a local residential street) or any of the other adjacent residential streets (Windsor or Plymouth)

Thank you.

Jeremy

Jeremy Strauss
CEO/Advisor
646-456-3012

Planning CPC <cpc@lacity.org>

Residential Safety Concerns – 4201 W. Pico Boulevard

Katie Cohen <kcrawfordcohen@gmail.com> Tue, Feb 24, 2026 at 9:25 PM
To: cpc@lacity.org

Dear Commissioners,

I'm writing about my concerns with the proposed development at 4201 W. Pico Blvd.

My name is Katie Cohen. I live on Victoria Avenue with my husband, Nim, and our young children. We have lived here for eight years.

We understand that new housing is absolutely needed in LA and that the project is moving forward under State law. That said, new development MUST be done right to preserve quality of life for people who already live in this city. We have 3 other lots between Pico/Victoria, Crenshaw and Olympic under consideration for development as well - including one across Victoria where Dina's flow shop is now. 4201 W pico and any other development should be taken in context of surrounding properties and that the density of our neighborhood is likely to go up substantially in the next 3-5 years.

Our home is next to the stop sign at 12th Street and Victoria. As I work from home daily, I see about 50% of cars roll through or fail to stop completely. As parents of young children, that reality of careless drivers on our street is always in the back of our minds.

For that reason, we are especially concerned about any increase in vehicle activity on Victoria resulting from the proposed development at 4201 W. Pico Boulevard - the volume that will almost certainly result from the development will bring more careless drivers too.

Further, if ride-hail pickups, food deliveries, courier services, and other recurring commercial activity are not clearly directed elsewhere, Victoria Avenue will become the convenient option for short-term stopping and drop-offs rather than Pico.

An increase in this kind of traffic — particularly vehicles unfamiliar with the neighborhood and focused on quick pickups — will likely increase the volume of unsafe behavior we already see at the 12th Street intersection. That change would fundamentally alter the safety and residential character of our block.

We respectfully ask the Commission to adopt the operational mitigations requested by the Olympic Park Neighborhood Council, especially a clear and enforceable

management plan that directs recurring commercial activity away from Victoria Avenue and toward the arterial frontages on Pico Boulevard and Crenshaw Boulevard.

With thoughtful safeguards in place, it should be possible for new housing and existing families to coexist well. Without them, the daily safety burden will fall on the residents of this residential street.

Thank you for your consideration.

Sincerely,

Katie Cohen

1207 S victoria Ave

917-817-0251

Planning CPC <cpc@lacity.org>

From Kara Newmark re: CPC-2025-1087-DB-VHCA

Mary Beth <mbfielder@gmail.com> Tue, Feb 24, 2026 at 9:23 PM
To: Planning CPC <cpc@lacity.org>
Cc: Kara Newmark <kara.architect@gmail.com>

Dear Commissioners,

My name is Kara Newmark. I live on Windsor Boulevard with my husband and our children, just around the corner from the proposed eight-story development at 4201 W. Pico Boulevard.

We understand that the project is moving forward under State housing law. This is not a request to stop housing. It is a request to carefully consider how a building of this scale will function in immediate proximity to family homes — and to apply reasonable conditions that protect residential livability.

Although our home is on Windsor, the surrounding residential streets operate as one connected neighborhood. Changes to Victoria Avenue will inevitably affect traffic patterns, circulation, and daily activity on Windsor and the adjacent blocks as well.

We are particularly concerned about daily operational impacts once the building is occupied.

We strongly support the operational safeguards requested by the **Olympic Park Neighborhood Council** — especially the request for a clear and enforceable management plan directing recurring commercial activity away from Victoria Avenue, which is a residential street, and to the arterial frontages on Pico Boulevard and Crenshaw Boulevard.

Clear operational conditions now will help ensure that new housing integrates responsibly into its surroundings rather than externalizing routine activity onto residential streets.

We welcome growth in our community. We simply ask that it be accompanied by thoughtful safeguards that protect the daily life of the families who already live here.

Thank you for your consideration.

Respectfully,

Kara Newmark

Planning CPC <cpc@lacity.org>

CPC-2025-1087-DB-VHCA – Request for Operational Safeguard

linda <lgamero@pacbell.net> Tue, Feb 24, 2026 at 2:55 PM
To: cpc@lacity.org

Dear Commissioners.

I live near Victoria Avenue. I want to be clear that we understand this project qualifies under State housing law. We are not asking to reduce height or units.

We are asking for one operational safeguard.

Victoria is a residential street with frequent driveway access and regular pedestrian activity. Without a defined loading and ride-hail management plan, recurring commercial vehicles may stage along the residential frontage simply because it is convenient.

That creates predictable conflicts: blocked sight lines, double parking, and congestion on a street not designed for commercial staging.

We respectfully ask that routine delivery and ride-hail activity be directed to Crenshaw or arterial frontage, consistent with the City's street hierarchy.

This does not change entitlements. It simply aligns operations with context.

Thank you.

Linda Gamero

Planning CPC <cpc@lacity.org>

CPC-2025-1087-DB-VHCA – 4201 W. Pico Boulevard – Support for OPNC Mitigations

Mary Beth Fielder <mbfielder@gmail.com> Mon, Feb 23, 2026 at 11:05 PM
To: cpc@lacity.org

Dear Commissioners,

As a Victoria Avenue resident who has helped coordinate neighborhood outreach regarding the proposed project at 4201 W. Pico Boulevard, I would like to briefly clarify the neighborhood's position ahead of the February 26 hearing.

The Olympic Park Neighborhood Council and the Mid-City Neighborhood Council both submitted comprehensive operational mitigation requests intended to protect the residential character of Victoria Avenue while allowing the project to proceed under State law. The surrounding neighborhood supports those recommendations in full and stands united behind them.

In recent communications, we suggested prioritizing the Loading and Ride-Share Management Plan as the single safeguard likely to have the greatest long-term impact. That suggestion was made in an effort to be practical and focused.

However, we respectfully ask the Commission to carefully review and, if feasible, incorporate the full set of operational mitigations recommended by both Neighborhood Councils.

We welcome new housing and future neighbors. Thoughtful operational safeguards are simply the mechanism that ensures residential streets remain residential while commercial activity is directed to appropriate corridors.

If these conditions can be included, the neighborhood would be deeply appreciative.

Thank you for your consideration.

Sincerely,
Mary Beth Fielder
Victoria Avenue
Los Angeles, CA 90019

Planning CPC <cpc@lacity.org>

CPC-2025-1087-DB-VHCA – Help Build Responsibly with creative solutions

Margaret Palisoc <margaretpalisoc@gmail.com> Tue, Feb 24, 2026 at 12:38 PM
To: cpc@lacity.org

Dear Commissioners:

I am a homeowner who has lived on Victoria Avenue for 25 years, and I bought a home in the city of Los Angeles instead of moving to a suburb because this is one of the last communities where we have single family homes with a backyard, and no multi-story buildings on our street beyond 2-stories high. We are also a diverse neighborhood of long-time homeowners from all races and socioeconomic backgrounds. Many of my neighbors have owned their homes for over 25 years. Our street is also part of the Oxford Square Historic Preservation Overlay Zone (HPOZ), and the proposed project at "4201 – 4221 West Pico Boulevard; 1261 South Crenshaw Boulevard" will be both directly next to and directly across the street from residential homes in our HPOZ.

I know that I cannot stop this proposed project from being built, and I welcome a new construction that will bring new retail shops and restaurants on its first floor to our community, but I do ask that you please carefully consider the long-term impact of allowing this project to be given "Off-Menu Incentives and Waiver of Development Standards." Just because this project qualifies for these exceptions, doesn't mean that it is the right thing to do for our community. I propose some other creative solutions to consider below.

More specifically, our neighborhood does not need an 8-story building, which is humongous immediately next door to a residential home, so **I respectfully request that you do not approve the permit for relief from Transitional Height requirements**. Even six-stories is enormous for our neighborhood. Plus, I don't want our city to make the same mistake that the Los Angeles Unified School District made when it built too many schools. I've met people who told me that they are being paid to live in recently built apartment complexes in the city of LA to make it look like there are people living there or else these new apartment buildings will be completely vacant because everyone is leaving LA.

The project is also requesting to be allowed a side yard setback of zero-feet in lieu of the 11-feet otherwise required. This setback abuts a residential home at 1262 Victoria Avenue, which was the historic home of William Grant Still (1895–1978), the first African American to conduct a major American symphony orchestra, and was designated as Los Angeles Historic-Cultural Monument #169 in 1976. Please put yourself in the shoes of a homeowner and if you own your own home, stand outside your home and look up into the sky as if you had an 8-story building right next to your home. How would that make you feel? **At a minimum, please require the building to have at least the 11-foot setback; in light of the recent fires in LA, allowing a zero-foot setback would be a safety hazard**. With that said, I've heard that the owner of this project also owns the 1262 Victoria Avenue home where the setback abuts. If this is true that they are the same owners,

then a creative solution may be to require that the owner include the historic 1262 Victoria Avenue home into its project and make it a community center that is open to both the residents of its building and also to the residents of the Oxford Square HPOZ where people can host community meetings and events.

If you approve all of the "Off-Menu Incentives and Waiver of Development Standards," then is there any way you can also help our existing community that will be negatively impacted by this project by assisting with one or more of the following?

1. Require the developer to include a gym that is free for both the residents of their property AND the residents of the Oxford Square HPOZ. Our HPOZ consists of only two residential streets. The gym can have an entrance with a security code keypad.
2. Require the developer to include a community room space for community meetings that is free for both the residents of their property AND the residents of the Oxford Square HPOZ. The community room can have an entrance with a security code keypad.
3. Require the city of LA to add parking restriction signs to prohibit overnight parking on the two residential streets nearest this project (Victoria Ave and Windsor Blvd) in the Oxford Square HPOZ. Our community previously submitted an application to the city to prohibit overnight parking, but we are still waiting to hear if it was approved. An 8-story building with 220 units will negatively impact our neighborhood's ability to find street parking for our own families.
4. Require the applicant to submit a clear, enforceable Loading and Ride-Share Management Plan before occupancy that directs delivery vehicles, service trucks, and ride-hail activity to use Crenshaw Blvd and Pico Blvd, which are arterial corridors, and that does **NOT** permit such activities on Victoria Ave, which is a residential street. Victoria Ave is a local residential street and was not designed to function as the commercial frontage for a large mixed-use development. A building of this scale will generate predictable commercial activity. It is reasonable to require the developer to plan intentionally for where that activity will occur — whether through the Crenshaw alley, arterial frontage on Pico or Crenshaw — and not to allow it to default to Victoria Ave, a residential street. The City has an adopted street hierarchy. Arterials are intended to handle commercial traffic; local streets are intended to serve neighborhoods. I respectfully ask that this project operate in a way that reflects that policy.

Your commission's "Racial Equity Value Statement" says that "Our goal is the creation of affordable, prosperous, resilient and healthy communities where all Angelenos experience the feeling that they belong." However, by automatically allowing every new large-scale development of rental properties to be given "Off-Menu Incentives and Waiver of Development Standards" without considering the long-term impact on homeowners, actually harms communities and does not make me and my fellow homeowners feel like we "belong" in the city of LA. Instead, it makes me question whether I should still live in LA or leave the city like many other Angelenos have recently left.

I hope that you are not just a "cookie-cutter" commission that approves everything exactly as how they appear on your agenda. I hope that you actually carefully read and take into consideration all perspectives, and weigh the pros and cons of both short-term and long-term solutions. As many of your bios state on the City Planning Commission's website, I hope that you are truly serving in your role as a Commissioner because you care about ALL Angelenos and not just people such as real estate and construction companies who are making money off of the projects that you approve.

Thank you for your consideration.

Sincerely,

Margaret Palisoc

Homeowner on Victoria Avenue for 25 years

Resident in the City of LA for 34 years

MID-CITY NEIGHBORHOOD COUNCIL® OFFICERS

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Esther Ahn, City Planner
Department of City Planning
City of Los Angeles

RE: 4201 W Pico Boulevard — Operational Conditions and Neighborhood Protections
Case No.: CPC-2025-1087-DB-VHCA

Dear Ms. Ahn,

The Mid-City Neighborhood Council has reviewed the proposed development at **4201 W Pico Boulevard** and appreciates the opportunity to provide input to the Department of City Planning.

The Neighborhood Council recognizes the City's obligation to accommodate new housing and does **not** request any reduction in project density, height, unit count, or modification of State-mandated incentives. Rather, our comments focus narrowly on **day-to-day operational impacts** and the need to ensure that routine project activity is **internalized on site or appropriately managed along arterial frontages**, rather than externalized onto surrounding residential streets.

The Neighborhood Council is concerned about potential operational impacts affecting **both adjacent arterial corridors (Pico Boulevard and Crenshaw Boulevard)** and **nearby residential streets**, particularly where project access, service activity, and garage operations interface directly with residential blocks. **Victoria Avenue**, as a residential street directly connected to the project's garage access, represents the **most sensitive residential interface** for daily project operations.

Requested Operational Conditions

1. **Residential Street Protections (Victoria Avenue)**

    - Prohibit routine non-resident project activity on Victoria Avenue, including ride-hail pick-up and drop-off, deliveries, service vehicles, and refuse operations, except in emergency or temporary circumstances.
    - Require that the residential garage access function solely for active resident vehicle ingress and egress, and not as a staging or stopping area.
    - Establish a **no-spillback performance standard**, such that garage operations do not result in queuing, stopping, or spillback into the public right-of-way on Victoria Avenue, with corrective action required if violations occur.
2. **Curb-Clear and Internalized Operations**
    - Require on-site accommodation of loading, deliveries, ride-hail activity, and refuse operations, or clear routing to appropriate arterial frontages, consistent with Vision Zero and Mobility Plan policies, without diversion onto residential streets.
3. **Refuse Collection Consolidation**
    - Consolidate residential and commercial refuse collection along the Crenshaw frontage, with fully enclosed on-site trash rooms and no routine refuse activity on residential streets.
4. **Managed Arterial Operations (Pico Boulevard and Crenshaw Boulevard)**
    - Require that project-related activity directed to Pico Boulevard and Crenshaw Boulevard be managed in a manner consistent with adopted safety and mobility policies, and not rely on residential streets for overflow, staging, or operational relief.
5. **Coordination with the 2026 Pico Boulevard Safety & Mobility Plan**
    - Evaluate and condition project operations based on reasonably foreseeable post-implementation Pico Boulevard conditions, with authority to require operational adjustments as street configurations change.
6. **Transportation Demand Management (TDM)**
    - Require a project-specific, enforceable TDM Operations Plan that explicitly supports residential street protections, identifies building management responsibilities, and includes measures to manage peak-hour garage activity.
7. **Post-Occupancy Monitoring and Corrective Authority**
    - Require a documented post-occupancy operational review within 6–12 months of initial occupancy to assess real-world conditions, including curb activity, garage access, arterial impacts, and residential street conditions, with authority to require corrective operational, management, or physical modifications if needed.
8. **Historic & Environmental Context**
    - The Neighborhood Council notes that the project site is adjacent to the **Oxford Square Historic Preservation Overlay Zone** and the **William Grant Still Residence (Historic-Cultural Monument #169)**. We request that Planning staff give full consideration to the historic and environmental context issues outlined in **Section III.8 of the accompanying memorandum**, including streetscape treatment, tree canopy, landscaping, and operational patterns that may cumulatively affect the historic setting and residential character of the area.

Purpose of These Requests

These requests are intended to ensure that the project operates in a manner consistent with adopted City safety, mobility, historic preservation, and neighborhood protection policies. They do not seek to delay or redesign the project, but rather to provide clear, enforceable standards so that potential impacts can be prevented or corrected if they arise.

This letter is accompanied by a supporting operational memorandum and a brief clarifying Q&A, which are provided to assist Planning staff in understanding the scope and intent of these requests.

Thank you for your consideration.

Sincerely,

Mid-City Neighborhood Council

Thank you for your time and consideration.

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Best Regards,
Mid-City Neighborhood Council

PART II — SUPPORTING OPERATIONAL MEMORANDUM

(Technical Basis for the Requested Conditions)

MEMORANDUM
To: Mid City Neighborhood Council (MINCLA)
From: Mary Beth Fielder, Stakeholder
Re: Daily Operations, Traffic Safety, and Coordination with Planned Street Changes — 4201 W Pico Boulevard
Case No.: CPC-2025-1087-DB-VHCA
Date: January 16, 2026

MEMORANDUM

To: Mid City Neighborhood Council (MINCLA)
From: Mary Beth Fielder, Stakeholder
Re: Daily Operations, Traffic Safety, and Coordination with Planned Street Changes — 4201 W Pico Boulevard
Case No.: CPC-2025-1087-DB-VHCA
Date: January 16, 2026

I. INTRODUCTION

I am a resident living near the intersection of Victoria Avenue and Pico Boulevard and a stakeholder in both the Olympic Park and Mid City areas. I regularly rely on the Pico Boulevard and Crenshaw Boulevard corridors, as well as the surrounding residential streets, for daily travel and access.

I support well-designed, transit-oriented housing and recognize the City's obligation to accommodate growth. However, the proposed project at **4201 W Pico Boulevard** raises unresolved issues related to **daily operations, loading and servicing, and coordination with planned street changes**, specifically the **2026 Pico Boulevard Safety and Mobility Plan**. These issues implicate **objective City standards** and raise concerns about whether recurring project operations are being appropriately **internalized on site** rather than **externalized onto surrounding public rights-of-way**.

This memo is submitted for **advance review** in connection with the upcoming Mid City Neighborhood Council meeting and the **February 26 City Planning hearing**.

II. MANDATORY TECHNICAL & SAFETY CONDITIONS

1. Internalized Loading & "Curb-Clear" Mandates

(LADOT Driveway Design Manual §3.2; Mobility Plan 2035; Vision Zero)

The Objective Policy:
The LADOT Driveway Design Manual and the City's Vision Zero policy prioritize eliminating curbside conflicts on arterial streets and High-Injury Network (HIN) corridors, and preventing the displacement of routine service activity onto residential streets. This project is located at the gateway to the **Pico Boulevard HIN**, a corridor identified by LADOT as having a disproportionately high rate of fatal and severe traffic injuries.

The Conflict:

The project proposes **220 dwelling units with 117 residential parking spaces**, which will generate substantial daily ride-hail, delivery, and service activity. Absent clearly designated on-site or internalized areas for these functions, such activity will be predictably displaced onto surrounding streets—either onto residential blocks or onto **Pico Boulevard and Crenshaw Boulevard**, both of which the City has already identified as high-risk corridors.

The Operational Requirement:

The project must internalize loading, ride-hail, delivery, and short-term stopping activity within the site through a **clearly defined curb-management strategy**, rather than relying on informal curb use on adjacent streets. This includes providing designated on-site areas for passenger pick-up and drop-off and for delivery and service activity, sized and configured to meet anticipated daily demand.

Routine curbside loading, stopping, or staging shall be **explicitly prohibited** on adjacent residential streets and on Pico Boulevard and Crenshaw Boulevard, except where temporary, emergency, or legally permitted conditions apply. Project operations must demonstrate how curb conflicts will be avoided and how daily activity will be managed in a manner consistent with Vision Zero and adopted City mobility policies.

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2. Refuse Collection & Operational Externalization

(LAMC §12.21(A)(19); LAMC §80.00 et seq.)

The Objective Policy:

The Los Angeles Municipal Code authorizes the City to regulate the location, timing, and manner of refuse storage and collection to prevent adverse impacts on surrounding properties and the public right-of-way, including noise, idling, obstruction, and safety hazards.

The Conflict:

City staff correspondence indicates that **commercial trash and a portion of residential trash collection are anticipated from the Crenshaw alley frontage**. The submitted plans do not clearly document this split, nor do they demonstrate why refuse operations already accommodated along the Crenshaw frontage cannot be **fully consolidated there**. No objective showing of infeasibility has been provided to justify shifting recurring refuse operations onto surrounding residential streets.

The Operational Requirement:

The City must require that **100% of residential and commercial refuse collection occur from the Crenshaw frontage**, with fully enclosed on-site trash rooms directly accessible to refuse service vehicles **without bin staging, bin transport, or truck stopping on residential streets**. Refuse collection shall be accommodated either through on-site truck access via the alley or by truck stopping on Crenshaw Boulevard with internalized bin movement wholly contained on site. No routine refuse-related vehicle idling, staging, or bin movement shall occur within the residential public right-of-way and shall not rely on future operational adjustments absent a documented showing of infeasibility

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3. Coordination with the 2026 Pico Boulevard Safety and Mobility Plan

(Mobility Plan 2035; LADOT Transportation Review Authority)

The Objective Policy:

Under Mobility Plan 2035 and LADOT's transportation review authority, project operations must be evaluated under **reasonably foreseeable future street conditions**, not outdated roadway configurations.

The Conflict:

Operational assumptions for the project appear to rely on **existing Pico Boulevard conditions**, despite the planned **2026 Pico Boulevard Safety and Mobility Plan**, which will alter vehicular capacity, turning movements, and curb demand. Absent analysis under post-implementation conditions, diversion risk and neighborhood intrusion cannot be accurately assessed.

The Operational Requirement:

All project operational analysis, access planning, and mitigation measures must be evaluated and conditioned based on **reasonably foreseeable post-implementation conditions** associated with the City's adopted **2026 Pico Boulevard Safety and Mobility Plan**, rather than solely on existing street configurations.

The City must require that project operations not rely on curb availability, lane configurations, or traffic patterns that are expected to change as a result of the Pico Boulevard improvements. In the event that Pico Boulevard's configuration is modified after project approval, the City must retain authority to require **operational adjustments** to loading, access, routing, or management practices to ensure continued compliance with adopted safety and mobility policies and to prevent diversion or spillover impacts onto surrounding residential streets.

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4. Residential Garage Access & Neighborhood Traffic Mitigation

(Mobility Plan 2035; LADOT Transportation Review Authority)

The Objective Policy:

Mobility Plan 2035 directs the City to protect residential streets from becoming high-volume access routes for large developments and to require operational and traffic controls where residential ingress and egress cannot be avoided.

The Conflict:

The project proposes **117 residential parking spaces**, with primary resident vehicle access from **Victoria Avenue**, a residential street within the Oxford Square neighborhood. This configuration will significantly increase daily vehicle trips on Victoria Avenue absent enforceable operational and traffic controls. Victoria Avenue has historically required traffic-calming measures, including speed humps, due to documented speeding and cut-through behavior. Concentrating resident ingress, refuse service, deliveries, passenger pick-up and drop-off, and other recurring operational activity on this street risks reintroducing exactly the conditions those safety investments were designed to address.

The Operational Requirement:

The City must require binding traffic-mitigation measures for the Victoria Avenue garage access, including turning restrictions to discourage cut-through traffic; operational controls governing garage access and circulation; clear routing of service and refuse operations away from the residential street; and signage and management policies directing short-term stopping activity to appropriate arterial or on-site locations.

In addition, the City must require that **Victoria Avenue not be used for routine non-resident project activity**, including but not limited to ride-hail pick-up and drop-off, deliveries, service vehicles, or refuse operations, except in emergency or temporary circumstances. **The residential**

garage access itself shall not be used for passenger pick-up or drop-off, ride-hail staging, delivery loading, or service vehicle stopping, and shall function solely for active resident vehicle ingress and egress. Project operations, signage, and management policies must clearly direct non-resident activity to on-site locations or arterial frontages and must include enforceable measures to prevent habitual non-resident use of the residential street.

Garage operations shall be designed and managed to achieve a no-spillback standard, such that resident vehicle ingress and egress does not result in queuing, stopping, or spillback within the public right-of-way on Victoria Avenue. The absence of spillback shall be treated as a required **operational performance condition**, not merely a design assumption. Any recurring vehicle queuing, stopping, or spillback observed on Victoria Avenue shall be treated as an **operational failure requiring corrective action**.

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5. Transportation Demand Management (TDM) Operations Plan

(Mobility Plan 2035; LADOT Transportation Review Authority)

The Objective Policy:

Mobility Plan 2035 authorizes and encourages the use of Transportation Demand Management measures to reduce vehicle trips, manage travel behavior, and mitigate operational impacts associated with new development. These measures are routinely required by the City, including for projects approved pursuant to state law, and are independent of parking minimum requirements.

The Conflict:

While the proposed project benefits from reduced parking requirements under state law, reduced parking alone does not eliminate vehicle trips, ride-hail activity, delivery demand, or curbside conflicts. Absent a binding, project-specific Transportation Demand Management framework, these impacts may be unmanaged and externalized onto surrounding arterial and residential streets.

The Operational Requirements:

The Transportation Demand Management (TDM) Operations Plan shall be designed and implemented **in direct support of the operational requirements governing the Victoria Avenue garage access**, including prohibitions on non-resident use, no-spillback performance standards, and residential street protections.

The TDM Operations Plan shall identify **building management responsibilities** for the implementation, monitoring, and enforcement of all applicable measures, and shall be enforceable as a condition of project approval.

At a minimum, the TDM Operations Plan shall include enforceable measures addressing the following:

- ride-hail pick-up and drop-off behavior, including clear direction of such activity to on-site locations or appropriate arterial frontages and away from residential streets;
- delivery and service activity management, including scheduling, routing, and operational controls to prevent curbside staging or residential street impacts;
- tenant communications and management responsibilities related to transportation behavior and garage use;
- parking unbundling, if any residential or commercial parking is provided; and
- **measures to manage peak-hour garage activity**, including tenant communications and operational practices designed to discourage discretionary vehicle trips during peak residential traffic periods.

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6. Post-Occupancy Operations Monitoring & Corrective Measures

(Planning Department Enforcement Authority; LADOT Transportation Review Authority)

The Objective Policy:

The City routinely conditions projects to ensure that operational assumptions made during project review are validated against real-world conditions after occupancy. Where actual impacts differ from projections, the City retains authority to require corrective operational measures to protect public safety and neighborhood conditions.

The Conflict:

Operational analyses for large projects necessarily rely on assumptions regarding travel behavior, curb activity, service demand, and routing. Without a post-occupancy review mechanism, unanticipated impacts—such as curb conflicts, diversion onto residential streets, queuing, or spillback—may persist without a clear path for correction.

The Operational Requirement:

The City must require a **documented post-occupancy operational review** to be conducted within **6 to 12 months** of initial project occupancy to evaluate actual conditions related to:

- curbside activity and conflicts;
- ride-hail, delivery, and service operations;
- residential street diversion and cut-through traffic; and
- loading, refuse, and garage access performance.

The post-occupancy review shall assess compliance with the project's approved operational assumptions and mitigation measures, including those governing **Victoria Avenue garage access**, non-resident activity prohibitions, and no-spillback performance standards.

If monitored conditions exceed projected or acceptable thresholds, or if operational performance is inconsistent with approval conditions, the City must retain authority to require **corrective operational measures**, including modifications to management practices, routing, signage, or other enforceable controls, to restore compliance with adopted policies and approval assumptions.

If post-occupancy monitoring identifies **recurring vehicle queuing, spillback, or stopping activity on Victoria Avenue** associated with garage access or project operations, the City must retain authority to require **physical, operational, or management modifications** sufficient to eliminate such conditions.

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7. Construction-Phase Mitigation

(LAMC; LADOT Construction Management Authority)

The Objective Policy:

The City retains authority to regulate construction routing, staging, hours, and site management to prevent avoidable impacts on surrounding neighborhoods, independent of project entitlement or density bonus provisions. Construction impacts are temporary but can be severe if not properly managed.

The Conflict:

Absent clearly defined construction-phase controls, large projects can generate substantial truck traffic, staging activity, noise, and curb obstruction on adjacent residential streets. These impacts are distinct from long-term operations and require separate, enforceable mitigation measures.

The Operational Requirement:

The City must require a **Construction Management Plan** that includes, at a minimum:

- designated haul routes restricted to arterial streets;
- prohibition of construction staging, queuing, or material storage on residential streets;
- defined construction hours consistent with City standards; and
- identification of a single, clearly posted point of contact responsible for responding to neighborhood concerns and compliance issues.
- explicit prohibition of incidental construction vehicle stopping, idling, or short-term staging on Victoria Avenue, except where temporary emergency access is required.

The Construction Management Plan must be enforceable and subject to City oversight throughout the construction period.

III. PLANNING, ZONING & HISTORIC PROTECTIONS

8. Historic & Environmental Context

(Oxford Square HPOZ; Historic-Cultural Monument #169; LAMC Landscaping Requirements)

The Objective Policy:
Projects adjacent to Historic Preservation Overlay Zones and Historic-Cultural Monuments must be evaluated to ensure that site design, operations, landscaping, and streetscape treatment preserve historic setting, residential character, and environmental quality. Tree canopy and streetscape landscaping are recognized elements of historic context and neighborhood character under applicable City standards.

The Conflict:

The project abuts the **Oxford Square Historic Preservation Overlay Zone** and **Historic-Cultural Monument #169 (William Grant Still Residence)**. The existing streetscape contains minimal tree canopy. Absent clear requirements, operational impacts, servicing patterns, curb activity, and insufficient landscaping could cumulatively degrade the historic setting and surrounding residential character.

The Operational Requirement:

The City must require that **project operations and streetscape design be evaluated in light of the site's historic context** and that all applicable landscaping requirements be met or exceeded, including meaningful tree planting and canopy coverage sufficient to enhance the historic and environmental character of the area.

CONCLUSION

This memo outlines unresolved operational and safety issues associated with the proposed **4201 W Pico Boulevard** project that affect **Pico Boulevard, Crenshaw Boulevard, and adjacent residential streets** within the Mid City area. These issues concern whether routine project operations are being adequately internalized and coordinated with planned street changes, consistent with objective City standards.

I respectfully request that the **Mid City Neighborhood Council** consider these findings and **direct the preparation of a Mid City Neighborhood Council letter to the Department of City Planning** addressing these concerns in advance of the **February 26 Planning hearing**. Letters should be emailed to City Planner Esther Ahn at **esther.ahn@lacity.org**

PART III — APPENDIX A: CLARIFYING QUESTIONS & RESPONSES

(For Planning Staff Reference)

Q1. Is the Neighborhood Council requesting a reduction in project density, height, or unit count?

A: No. The Neighborhood Council is not requesting any reduction in density, height, floor area, or unit count. All requests relate solely to **operational management and mitigation**, within existing City authority, and do not describe or imply changes to project entitlements.

Q2. Is the Neighborhood Council requesting additional parking or reinstatement of parking minimums?

A: No. The Neighborhood Council is not requesting additional parking, changes to parking ratios, or reinstatement of parking minimums. The focus is on **curb management, operational behavior, and residential street protections**, consistent with State law and City mobility policies.

Q3. Why does the memo emphasize Victoria Avenue?

A: Victoria Avenue is a residential street directly connected to the project's garage access and represents the **most sensitive residential interface** for daily project operations. City mobility and safety policies prioritize preventing routine project and arterial activity from being externalized onto residential streets.

Q4. Are Pico Boulevard and Crenshaw Boulevard also considered in these requests?

A: Yes. Pico Boulevard and Crenshaw Boulevard are identified as appropriate arterial frontages for project-related activity, provided that such activity is **managed in accordance with adopted safety and mobility policies** and does not rely on residential streets for overflow, staging, or operational relief.

Q5. Are the requested conditions enforceable?

A: Yes. The requested conditions rely on established authority held by the Department of City Planning and LADOT over operational management, curb activity, loading, refuse collection, garage access, and post-occupancy monitoring. No discretionary design approvals are requested.

Q6. Why is post-occupancy monitoring requested?

A: Operational analyses for large projects necessarily rely on assumptions. Post-occupancy monitoring allows the City to evaluate real-world conditions after occupancy and require corrective action if actual impacts differ from approval assumptions or adopted policy objectives.

Q7. What happens if post-occupancy monitoring identifies problems?

A: If monitoring identifies recurring issues such as curb conflicts, diversion onto residential streets, garage queuing, or spillback, the City would retain authority to require **operational, management, or physical modifications** to restore compliance with adopted policies and approval conditions.

Q8. Is the Neighborhood Council opposed to housing at this site?

A: No. The Neighborhood Council supports housing development and is focused on ensuring that new projects operate responsibly and in alignment with City safety, mobility, and neighborhood protection policies.

APPENDIX B: PROPOSED NEIGHBORHOOD COUNCIL MOTION (FOR CONSIDERATION)

(This language is provided for convenience and may be amended by the Council.)

Motion:
I move that the Mid City Neighborhood Council approve and transmit a letter to the Department of City Planning regarding the proposed development at **4201 W Pico Boulevard (Case No. CPC-2025-1087-DB-VHCA)**, substantially in the form circulated by the stakeholder, together with the attached supporting memorandum and clarifying Q&A.

Planning CPC <cpc@lacity.org>

Public Comment – 4201 W Pico Boulevard

Sebastian Hanson <seb.hanson42@gmail.com> Tue, Feb 24, 2026 at 11:41 PM
To: cpc@lacity.org

Dear City Planning Staff and Commissioners,

My name is **Sebastian Hanson**, and I live on **Windsor Boulevard** near Pico Boulevard. I'm writing to express concern about **traffic and safety conditions on residential streets** that could be affected by the proposed 4201 W Pico Boulevard development.

I'm especially concerned for the safety of the **young children who live on my street**, as well as my **young nephews who visit regularly**. Windsor Boulevard already experiences **high traffic volumes and speeding**, and residents have long had to be vigilant about unsafe driving behavior.

With a **222-unit project** at this location, additional daily activity related to resident traffic, ride-hail pick-ups and drop-offs, deliveries, and service vehicles will occur. If these operations are not carefully managed and internalized on site, there is a real risk that project-related traffic will spill onto nearby residential streets like Windsor, worsening conditions that are already challenging.

I respectfully ask the City to ensure that **enforceable operational and traffic controls** are in place so that residential streets are protected from increased speeding, cut-through traffic, and safety conflicts as a result of this project.

Thank you for considering this comment as part of the administrative record.

Sincerely,
Sebastian Hanson

(Case No.: CPC-2025-1087-DB-VHCA)

Planning CPC <cpc@lacity.org>

CPC-2025-1087-DB-VHCA - Request for Careful Consideration of Impacts – 4201 W. Pico Boulevard

Todd Grossman <todd@grossmantech.com> Tue, Feb 24, 2026 at 1:32 PM
To: "cpc@lacity.org" <cpc@lacity.org>

Dear Commissioners,

My name is Todd Grossman. My wife and I live with our three teenage children two houses down from the proposed eight-story development at 4201 W. Pico Boulevard.

Our home will sit directly adjacent to a building that, as currently approved under Density Bonus provisions, eliminates setbacks and step-backs that are ordinarily required when a large structure abuts residential property. Those standards exist for a reason. They are intended to soften the transition between commercial-scale buildings and family homes — to preserve light, air, and a basic sense of space.

We understand that State law allows certain variances. We are not asking you to disregard the law. But we are asking you to recognize what those automatic concessions mean in real life for a family living a few yards away.

An eight-story wall rising directly from the property line fundamentally changes the experience of our home and yard. The loss of step-backs will significantly reduce natural light and alter the sense of openness we have had for years. These are not abstract design details. They affect how our children experience their home — the backyard where they have grown up, the windows that once brought in afternoon light, the feeling of breathing room that makes a residential street feel livable.

We also ask that you give serious consideration to the operational mitigations requested by the Olympic Park Neighborhood Council. In particular, we strongly support the request for a clear and enforceable management plan that directs recurring commercial activity — ride-hail pickup, deliveries, and service vehicles — away from Victoria Avenue, which is a residential street, and toward the project's arterial frontages on Pico Boulevard and Crenshaw Boulevard.

Without that direction, it is foreseeable that Victoria will become the default location for pickup, drop-off, and delivery traffic. For those of us living just steps away, that would mean constant vehicle turnover, idling, door-slamming, and curbside congestion in front of family homes.

We recognize the City's housing goals and we are not opposed to new neighbors. But projects of this scale should not function in a way that shifts predictable impacts onto the few households that sit immediately beside them.

We respectfully ask the Commission to carefully weigh both the physical proximity impacts created by the loss of setbacks and step-backs, and the long-term operational impacts that can still be addressed through conditions of approval.

Thank you for your time and consideration.

Sincerely,
Todd Grossman

Todd Grossman

Grossman Technologies

todd@grossmantech.com

310.873.7835

Planning CPC <cpc@lacity.org>

CPC-2025-1087-DB-VHCA -Support Condition of Approval to Protect Victoria Avenue – 4201 Pico

Tom Johnson <tomhjohnson@gmail.com> Tue, Feb 24, 2026 at 1:26 PM
To: cpc@lacity.org

Dear Members of the Planning Commission,

My name is Tom, and my family lives on Victoria Avenue. We have two young daughters who walk this street every day — to school, to friends' houses, and just to be outside in our community.

We understand that this project is governed by State housing law, and we are not asking for fewer units or a smaller building. We accept that the residential garage entrance will be on Victoria Ave.

What we are asking for is reasonable and focused: **adoption of the proposed condition of approval requiring a Loading and Ride-Share Management Plan that directs routine delivery, ride-hail, and commercial service activity to the Crenshaw alley or arterial frontage rather than allowing it to rely on Victoria Avenue.**

A 244-unit building will generate significant daily vehicle movement. Even conservative estimates suggest hundreds of trips per day. That makes it even more important that commercial pickup and delivery activity be intentionally managed rather than defaulting to a residential street.

Anything that can reduce unnecessary traffic concentration on Victoria — including directing routine commercial activity to arterial streets and exploring measures that encourage resident traffic to use Pico Boulevard where feasible — would help preserve the safety and livability of our block.

This condition does not reduce units or change the project's height. ***It simply ensures the building operates in a way that respects the surrounding residential street.***

I respectfully ask that you include this condition in your approval.

Thank you for your time and consideration.

Sincerely,

Tom Johnson
Longtime resident of Victoria Avenue

_____
Tom Johnson

Planning CPC <cpc@lacity.org>

CPC-2025-1087-DB-VHCA – Support Operational Condition

Tania Missad <tbmissad@gmail.com>
To: cpc@lacity.org
Cc: Geoff Missad <gmissad@gmail.com>

To Whom It May Concern:
I am a homeowner and resident within Oxford Square HPOZ, and I'm writing in reference to a planned development at 4201 Pico Boulevard, at the corner of Pico and Crenshaw on the north
Square HPOZ.

We recently moved into this neighborhood with our two daughters and selected it for the quiet, historic nature with specific desire to live in an HPOZ area that is protected by excessive develo
and history of Los Angeles. We invested in this property at a premium price to enjoy a beautiful slice of Los Angeles history & enjoy a quieter haven within the urban center. The history of C
haven for Black Jazz musicians - makes it so fascinating and adds to its rich character and beautiful historic homes.

As we heard about the 8-story and 225 unit development being planned on the corner of this beautiful neighborhood, we feel that there has to be a way to balance development with protectio

In terms of positives: the development will give a much needed facelift to that section of Pico Boulevard & addresses much needed commerce & housing in the area. We are hopeful a nice r
goes into the commercial spaces, and we're looking forward to some modernity on the block.

We do have serious concerns, however, about some of the plans that will greatly impact traffic down our residential street and would like to ask for some operational concessions given Oxfor
neighborhood made up of 90% single family residences - with families with little kids playing on the streets of this neighborhood:

1) Since the only parking structure entrance and commercial drop off zone is on Victoria and not Pico or Crenshaw, it will create a vast increase in traffic on a normally quiet residential street,
addition to commercial traffic from a high-density development. **Could loading for commercial zones or designated ride-share pick-up/drop off zones be directed off the Crenshaw A**
2) Similarly, could we consider an option to block off the residential area north of the building on Victoria, via closures like the attached pictures show, that protect the Carthay Square HPOZ fr
Olympic? These closures were created to protect that HPOZ a few years back - given the large commercial structure built on that corner (Olympia Medical Center) - a structure that was simil
than this building.
3) Another option could be to prohibit right hand turns down Victoria from the building's exit, forcing traffic to turn left and immediately onto Pico instead of Victoria?
4) Given the plan to make Pico East of Crenshaw a two-lane street vs. a 4-lane street to add bike and public transport lanes, traffic will already be greatly exacerbated into Oxford Square as p
narrowing of Pico. Has this been considered in totality - inclusive of this development - to understand the big picture ramifications to traffic patterns overall?
Given the current quiet nature of the street where kids ride their bikes and families walk dogs and children play outside - the increased traffic would greatly impact the quiet and
families and residents.

5) The lack of adequate parking (not enough to cover 225 units) will create important issues of parking on a quiet residential and historically protected street. Understanding that more parkin
we expedite the approval of Oxford Square's parking permit petition to require overnight parking protections for single family home residents on the street?

While my family and I fully support increased housing and the facelift that Pico so desperately needs, it MUST be balanced with respect to historic neighborhoods and LA's rich history. These
existing residents / homeowners, voters and taxpayers.

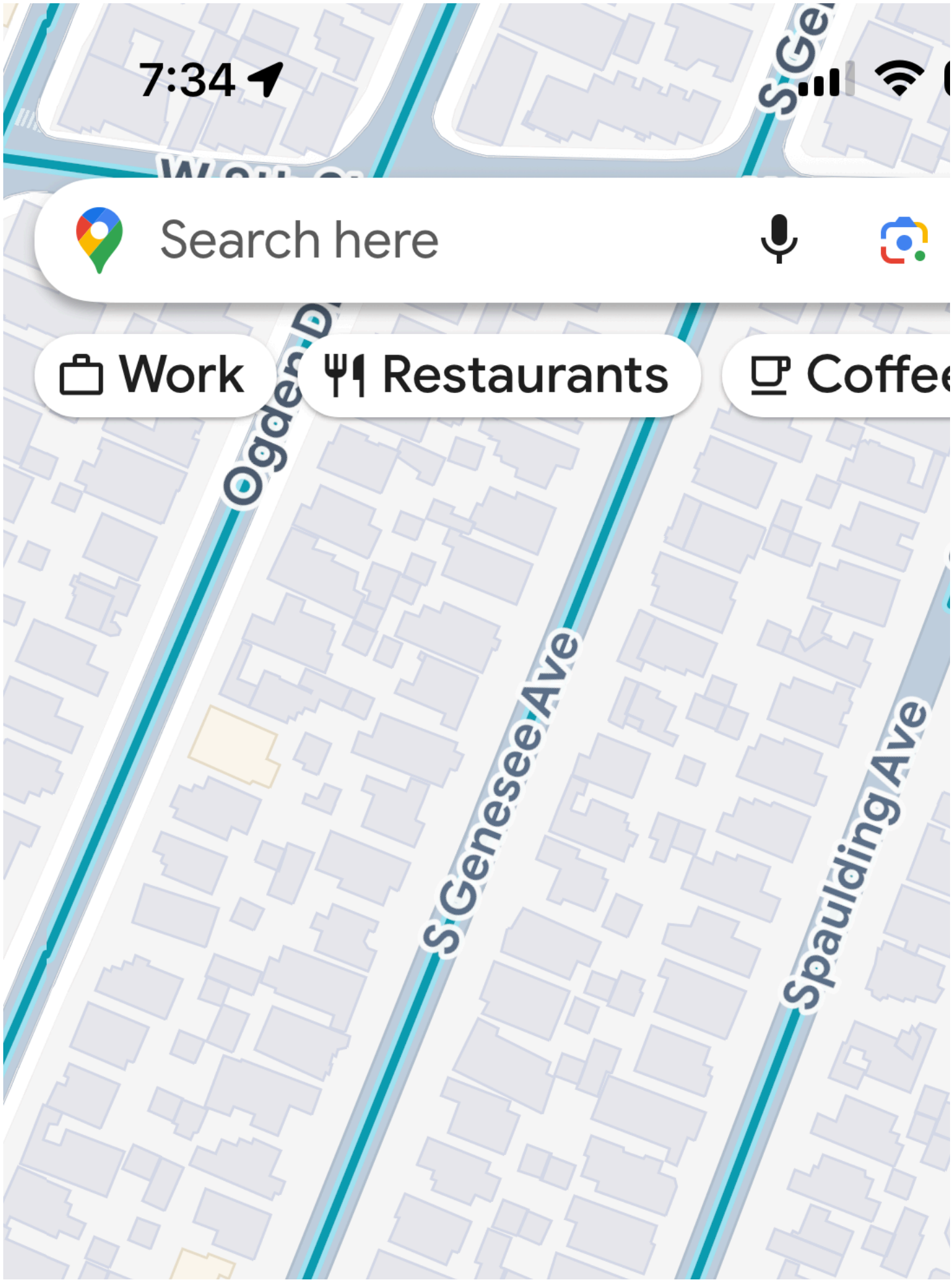
Thank you for your consideration.
Tania Missad
Voter & Homeowner at 1179 S Victoria in Oxford Square

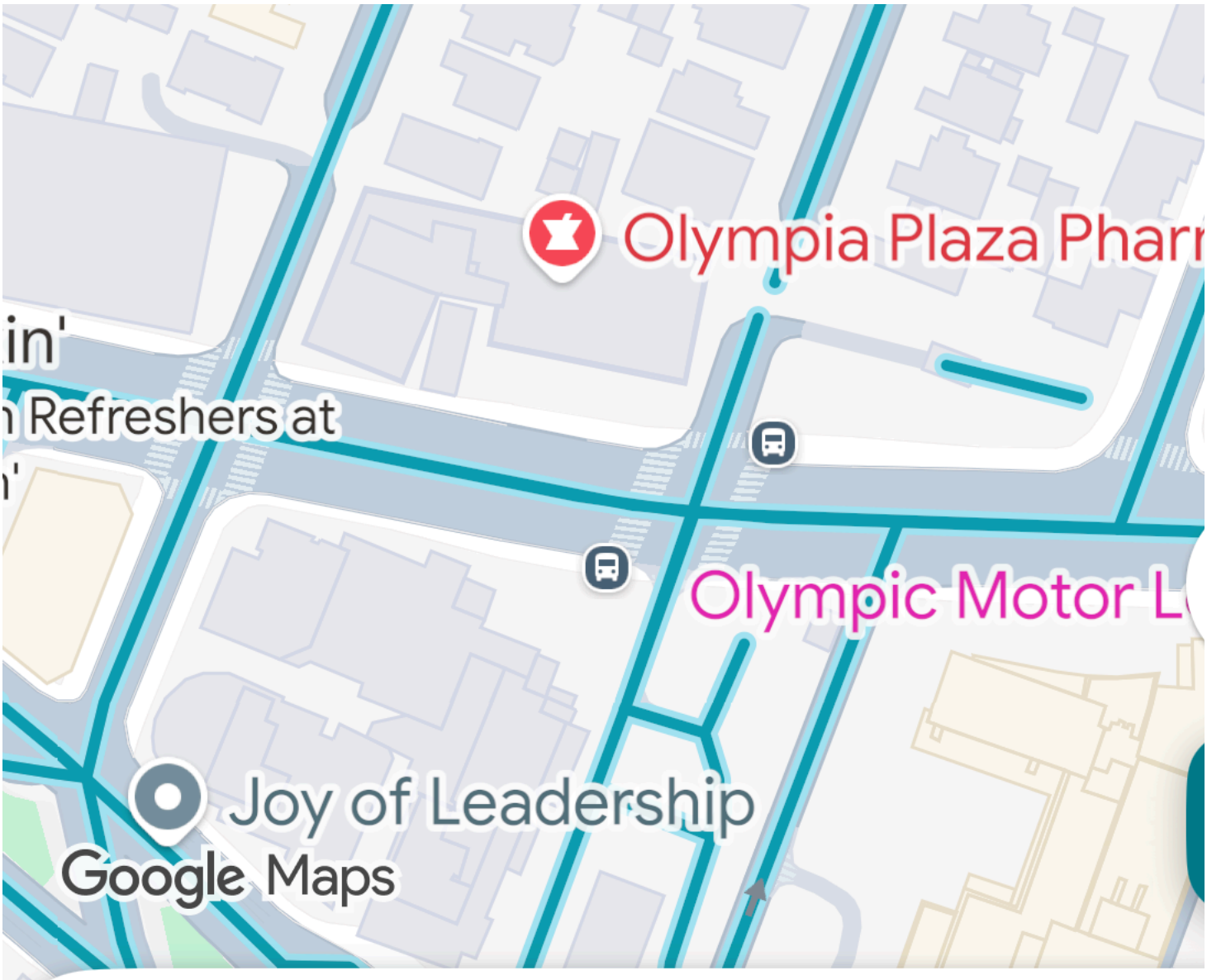
For #2: Consider blocking street off to protect an HPOZ like the Carthay Square HPOZ had enacted a few years back.
Corner of Olympic and Genessee protecting Carthay Square.



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UNITED NEIGHBORHOODS NEIGHBORHOOD COUNCIL

United Neighborhoods of the Historic
Arlington Heights, West Adams,
and Jefferson Park Communities
Neighborhood Council

February 25, 2026

Los Angeles City Planning Commission
CC: Hakeem Parke-Davis, Council District 10
RE: **4201 West Pico Blvd., CPC-2025-1087-DB-VHCA, CPC Agenda Item 6**

Dear Ms. Monique Lawshe, President; and Commissioners:

UNNC, the United Neighborhoods of the Historic Arlington Heights, West Adams and Jefferson Park Communities Neighborhood Council, routinely comments on development projects that intersect the junctions between our UNNC footprint boundaries and other neighborhood councils. The project at 4201 West Pico Blvd. is one such project, intersection MINC (MidCity Neighborhood Council), UNNC and, of course, OPNC (Olympic Park Neighborhood Council).

UNNC's Standing Committee on Planning & Zoning did review this project.

UNNC supports quality housing, and we have approved MANY infill projects in this community. But UNNC is concerned about several aspects of the proposal, based on our own longstanding principles defining "good" development:

- The Applicant's request to reduce the number of required trees, based on Applicant's statement that it would be too expensive to plant and maintain the trees, is an inappropriate reason to award a waiver. Our community has a documented much lower tree canopy than in other parts of the City, and every effort should be made to increase the number of trees planted.
- In addition, the request to eliminate any setback on the residential (north) side of the project flies in the face of good planning. This project would qualify, on the southern (Pico) side of the development, for a slightly higher building, and the Applicant should be asked to redesign the project to move some units to the southerly building in order to both provide the desired number of units and providing relief to the local residents (versus relief and waiver from the required 8-foot setback).

UNITED NEIGHBORHOODS NEIGHBORHOOD COUNCIL

United Neighborhoods of the Historic
Arlington Heights, West Adams,
and Jefferson Park Communities
Neighborhood Council

- Affordability is always one of UNNC's concerns. The project may technically offer enough Low Income units, but it does not take into account the actual income levels of the community. In Arlington Heights (defined for these numbers as the neighborhood between the 10 freeway and Olympic Boulevard, Crenshaw to Arlington – immediately adjacent to the project, 30.4% of the households have incomes below the City's median income. This project will have few, if any, units affordable for our neighbors (or their children) to occupy.
- In addition, traffic safety and traffic mitigations are important for the Commission to consider, some of which are within the scope of the project itself – and some mitigations which could be recommended to City Council. Specifically, the neighbors to the north of the project on Victoria expressed strong concerns at the public hearing about cut-through traffic and traffic safety on their residential streets. For example, and just by way of example, why not propose a mitigation of a partial closure on Victoria such that traffic from the project could not travel north on Victoria (possible through a bump out at its egress driveway)? OPNC and the neighbors have discussed the "vehicular circulation, curbside safety, and daily operational impacts" of the project on both Pico and Victoria, and UNNC urges the Commission to heed the neighbors' and the neighborhood council's request to impose conditions that would reduce those impacts.

Lastly, UNNC would ask that the Commission not allow the use of the program EIR as a substitute for a specific project environmental clearance. It appears that there are currently unmitigated potential impacts of this project that should be evaluated.

Thank you for your consideration.

Cordially,

Laura Meyers

Laura Meyers, President, UNNC
laura.meyers@unnc.org

Comment by Virginia Jauregui **CPC-2025-1087-DB-VHCA**
February 25, 2026

DELAY OR REJECT APPROVAL 4201 PICO INVESTMENT LLC - PENDING INQUIRY INTO CITY PLANING FRAUD IRON FENCE REQUESTED LIKE NEIGHBORS SOUTH OF PICO

This letter is to request the City Planning Commission **delay** or reject approvals related to awarding off-menu incentives or permissions for 4201 W. Pico Blvd, due to issues of provable fraud involving the Dept. of City Planning and development in the area.

In September 2023, I complained to Councilmember Heather Hutt and the other members of the Plum committee in a CEQA Appeal, for which I provided proof of environmental fraud by the Dept. of City Planning involving developments in the AO flood zone of which City Planner Nick Hendriks was involved. Mr. Hendricks used his position to forge and get fake CEQA exemptions by pretending the locations were not in the AO FEDERAL FLOOD ZONE. Approximately one week after I complained, Mr. Hendricks' death was announced but no cause was given. Did the city determine if Mr. Hendricks compromised his role as a trusted public employee to enable fraud on behalf of developers? This behavior purposely disenfranchises the community and its people of environmental protection. Has the City investigated what may have led to his possible suicide, and whether his previous work environment contributed to his passing? In 2020 I complained and provided proof of environmental fraud to this commission involving the Solaris Prop HHH development on Crenshaw, which the members of this commission paid no attention.

How is the Dept. of City Planning capable of providing equal protection to the people when there is a history of environmental fraud committed by its employees in the area? Is it then too compromised as an entity to plan the city to its best and highest potential, including for the Olympics?

Four construction projects were found over the last 10 years, down the street from 4201 on Crenshaw, within a 150ft of one another. (C3, Solaris, EK Art Gallery, The Amber. Corruption denies the residents of Oxford Square the right to equal protection by its public servants in favor of anonymous persons who are able to push predatory development onto communities who trust the City to follow the rule of law.

Based on the close proximity of 4201 to the documented development fraud along Crenshaw Blvd. by Mr. Hendricks and other employees, the Dept. of City Planning is **not** qualified to dictate permanent changes to this community at this time, nor represent the community based on their history of fraud. By committing environmental fraud, City Planning denies the ability of the people to protect themselves from planning abuse.

Should the CPC approve 4201 Pico, there is no guarantee that it will be used as intended and the property could very easily be sold to investors eager to take advantage of the coming Olympics and c4 designation and other entitlements which could enable Olympic use, and may lead to land and homes being eminently domained for private construction projects

Originally the applicant requested in their February 2025 Project description for a conditional use permit to vend and consume alcohol daily between the hours of 7am and 2am, which according to them is to benefit the workers and residents of the surrounding community. Further its original project description flipflopped and said it would be and would NOT be providing parking on site for residents.

Using City Staff to dictate and force the neighborhood to act as a parking lot and thoroughfare in violation of the objectives of the Wilshire Community Plan. What happens when Victoria is used as a throughway for persons wanting to go to visit its retail till 2am? Designing the structure to have one driveway leading into and out of Victoria, instead of Pico is in violation of the Wilshire Community Plan, which specifically states in that new construction would not rely on in out residential areas:

Comment by Virginia Jauregui **CPC-2025-1087-DB-VHCA**
February 25, 2026

Goal 14 discourage non residential traffic flow on residential local streets

Objective 17.2 Locate access to major development projects so as not to encourage spillover traffic on local residential streets.

How lawful are current laws when Developers mold laws so that they can make what was previously illegal to now be legal?

Are commissioners held legally responsible should authorities become aware that fraud is ignored near Oxford Square in order to push construction, such as for "public housing" like Solaris, that rewards private developers and landlords with public funds with no oversight as to how the money is spent? Would the CPC have voted to allow Solaris to be constructed when it cost close to$700,000 a unit to construct?

What happens to the careers of commissioners when the people find out about their role in ignoring fraud and denying environmental and equal protection of the people in favor of the wants and desires of the anonymous and powerful, who bear no responsibly of their decisions of the community, and because no proof of environmental problems are provided to City Planning from the applicant, environmental problems then don't exist.

The Dept. of City Planning offers the people no protection or recourse from bad planning dictated by the powerful and anonymous. It has handed authority to plan the city over to anonymous developers and investors who have used their position of influence to change laws and ordinances to protect ugly, dysfunctional, and corrupt planning that violate the environmental protection of the people and their neighborhoods.

By engaging in fraud, the Dept disenfranchises the surrounding community of due process and equal protection. Does city planning then have the ability to act fairly when interpreting the impacts of development on the surrounding community? If the causes of Mr. Hendricks death are determined to be related to his role as City Planner, can City Planning then be determined to be impartial enough to make decisions regarding 4201 Pico when laws and ordinances are dictated by the development industry, of the development industry, and for the development industry and its investors who change law at the state and local level to make what was previously illegal now legal.

The City of Los Angeles has a history of selling out local neighborhoods for "public housing" such as Chavez Ravine and the neighborhood of Downtown LA who were promised public housing and instead imminent domained with their land given to the Dodgers, and the other used for the construction of office towers. The city ignores development fraud because it is in desperate need of new sources of revenue that come from increased property taxes that will never ever ever be enough to cover the cost of inflated salaries and extensive benefits, unsustainable pensions, never-ending worker's comp claims, and court settlements caused by their bad management.

A functional city cannot exist when decisions related to city planning are guided by investors, and there is provable fraud committed by the Dept. in the local area. Olympic Park could very well be its own city because those hired, elected, and appointed have failed to protect the best interest of the people.

Should commissioners make any approvals it should be to place an iron gate on Victoria to protect it like its neighbors across the street were allowed to do 30 years ago.

Thank you,

Virginia Jauregui

WAHA
West Adams Heritage Association

2263 South Harvard Boulevard • Historic West Adams • Los Angeles, CA 90018 • 323-735-WAHA (323-735-9242)

February 26, 2026

Los Angeles City Planning Commission
CC: Hakeem Parke-Davis, Council District 10
Esther Ahn, City Planner
RE: 4201 West Pico Blvd., CPC-2025-1087-DB-VHCA, CPC Agenda Item 6

Dear Ms. Monique Lawshe, President; and Commissioners:

The West Adams Heritage Association has been advocating for historic preservation and the conservation of the neighborhoods comprising the Historic West Adams District for more than 40 years. Additionally, we were engaged in the advocacy that established the Oxford Square HPOZ in 2017.

We have been asked by several of our members to weigh in on this proposed project, which, if approved as presented, would have a significantly negative impact on the immediately-adjacent designated William Grant Still resident, Los Angeles Historic Cultural Monument No. 169, designated in 1976 and located at 1262 S. Victoria. As well, negative impacts on the Oxford Square HPOZ should be considered as a part of any evaluation of this project.

The William Grant Still Residence also is designated as an "Individual Property determined eligible for the National Register" by consensus through the Section 106 process (from a federal project DOE project in 1986). It is also listed in the California Register. All of these historic designations tell us that the City is responsible to protect this important resource.

Along with CEQA issues related to adjacency and alteration of historic context for both the individual HCM and the Oxford Square HPOZ, the request(s) to eliminate any setback adjacent to 1262 S. Victoria (and thereby NOT providing any sort of landscape buffer) disturbs the setting, visibility and the integrity of the setting. The new building will have shadow, scale, and massing impacts on the designated historic resource and is not providing any sort of mitigations related to these impacts (e.g., landscape buffering at a minimum). Construction of an 8-story building with a zero-foot setback may also undermine the structural stability of the parcel (land) immediately north, and potentially also damage the underpinnings of the residential structure itself.

William Grant Still Jr. (May 11, 1895 – December 3, 1978) was a trailblazing African American composer of nearly two hundred works, including five symphonies, four ballets, nine operas, and more than thirty choral works, art songs, chamber music, and solo works -- most famously, his first symphony, 1930's Afro-American Symphony. Indeed, Still was the first African American composer to have an opera produced by the New York City Opera. Because of his close association and collaboration with prominent African-American literary and cultural figures, Still is considered to be part of the Harlem Renaissance. So important was William Grant Still to the history of music in Los Angeles, and particularly the role of African Americans, that along with historic designation of his (relatively modest) home, the City has also named one of its cultural arts centers after him.

WAHA therefore believes that the Proposed Project is **NOT** within the scope of the program approved in the 2021-2029 Housing Element, and the 2021-2029 Housing Element Environmental Impact Report No. ENV-20206762-EIR; SCH No. 2021010130 (EIR), certified on November 24, 2021, and that these documents **DO NOT** adequately describes the activity for the purposes of CEQA.

WAHA urges the Hearing Officer to NOT approve several of the Off-Menu Requests for this project. Specifically, please do not approve any waiver of the required 11-foot setback adjacent to 1262 S. Victoria, and instead require a landscaped buffer within that setback.

This would also allow the planting of the nine additional trees that Applicant also proposes receiving a waiver from the responsibility to plant (that is, an Off-Menu request to reduce tree planting by 18%, from 55 to 46). Applicant says the cost of planting nine more trees and their long-term maintenance costs would be an economic burden; however, this community has a major social justice burden of an extremely low tree canopy compared to other communities in Los Angeles, and WAHA finds that to be far more important than the added cost of maintaining nine additional trees.

WAHA does support the development of new housing, especially affordable housing. However, this project proposes significant waivers of normal development standards in order to provide only 18 *truly* affordable units (at the VLI, Very Low Income, level). The remaining 17 so-called affordable units are actually at the "Moderate" level, 120% of AMI (e.g., income levels circa $100,000 a year), which is hardly affordable in the context of this community, where our actual naturally affordable housing is being demolished and those residents are losing their longtime homes.

We also have specific concerns regarding how this case is being handled, technically. The project is located within the Mid-City Recovery Redevelopment Area. The California Supreme Court has issued a ruling that, at core, states that no project within a redevelopment plan shall receive any approval without an analysis as to whether or not it is consistent with the Redevelopment Plan land use components. Yet we do NOT see within the publicly-posted documents on the Planning Department website any such evaluation. How is it that you are even holding a hearing without such documentation?

If you have completed such an evaluation, why is it not posted to the public for comment?

Although WAHA has not itself conducted such an evaluation, it would seem that the proposed project in fact would not be deemed fully compliant with the MidCity Recovery Redevelopment Plan, given that it includes objective standards related to impacts on adjacent properties and historic resources, among other items.

We would ask that the file be kept open to consider these issues.

Thank you for your consideration.

Laura Meyers
West Adams Heritage Association

Please send correspondence to:
1818 S. Gramercy Place, Los Angeles CA 90019 or via email, communications@westadamsheritage.org

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February 25, 2026

VIA E-MAIL (cpc@lacity.org) and HAND DELIVERY

President Lawshe and Members of the
City Planning Commission
Attn: Cecilia Lamas, Commission Exec. Asst. II

Re: 3701 – 3761 Stocker Street
February 26 Agenda Item 7
Day-of-Hearing Submittal

President Lawshe and Members of the City Planning Commission:

On behalf of 3731-41 Stocker Opportunity LLC 3751-3761 and Stocker Traditional LLC (collectively, "Stocker"), the Owner and Applicant of the proposed Project, we provide this day-of-hearing response to the February 25 supplemental submittal from counsel for CREED LA. As with its December 8, 2025 letter, the errors and omissions in its recent letter fail to substantiate a fair argument that the Project would result in significant and unavoidable impacts. The MND for the Project remains appropriate, and Stocker asks that the CPC adopt it.

1. CREED LA Mischaracterizes HRA Guidelines and Requirements.

CREED LA's consultant purported to recalculate the health risk of the Project's construction emissions to show a significant impact regarding cancer risk. However, the calculations conflate the Office of Environmental Health Hazard Assessment ("OEHHA") Health Risk Assessment ("HRA") guidance regarding the risk to the maximally exposed ***individual*** receptor during construction, ***versus*** the ***long-term***, ***population-scale*** exposures. Specifically, CREED LA's consultant erroneously asserts that the "fraction of time at home" variable in the HRA should be set at a value of 100% because there is, "a school within the $1{\cdot}10^{-6}$ (or greater) isopleth." But these isopleths defining "Zones of Impact" only apply in population-scale exposure assessments, as described in Section 4.6 of the OEHHA HRA Guidance Manual. The cancer risk isopleth for a population-scale HRA is determined based on a 70-year lifetime exposure, as explicitly defined in the OEHHA Guidance Manual (p. 9-13): "Note that the assessment of ***population impacts*** [emphasis added] must be based on a 70-year exposure duration."

But Project construction likely would not last longer than three years, which represents only 4.3 percent of the lifetime exposure duration used in establishing the cancer risk isopleths for a population-scale HRA. Therefore, the cancer risk isopleth is not relevant to the construction HRA prepared for the Project, as the isopleth "Zone of Impact" is based on a 70-year exposure duration, and ***the estimated cancer risk at the school would be 95 percent lower*** during the three years of construction. The calculations reflected in the Staff Report were prepared using the already conservative exposure variables recommended by OEHHA for construction HRAs, and the HRA's impact determination remains valid.

2. CREED LA Mischaracterizes the Energy Analysis, Which Remains Valid.

CREED LA asserts the energy calculations do not discuss energy consumption of sound stage production or demonstrate LEED reductions, and they use generic calculations. Not so, and CREED LA's consultant actually uses generic inputs. The energy consumption estimates identified in the MND Staff Report are based on information the Applicant provided, as shown in Section 8.1 of the CalEEMod Detailed Report included with the Staff Report: "Operations: Energy Use – Energy demand provided by Applicant (accounts for all building structures)." CalEEMod User's Guide requires "justifications for all changes made to the default settings (e.g., reference more appropriate data sources)."

Here, the energy consumption estimates are based specifically on refined design plans and provide Project-specific data, rather than the CalEEMod default values, using detailed energy modeling software (IES-VE Virtual Environment). This allows a detailed, 3D representation of the buildings, with all uses, equipment, occupancy, HVAC, electrical and plumbing systems as specifically designed for the project. Project, video/sound stages and associated programs are accurately represented in the building's energy models. More than twenty individual measures (architectural as well as mechanical, electrical and plumbing) have been investigated and assessed for integration into the Project for the purposes of energy efficiency, consistent with LEED Gold checklist items. CREED LA's consultant provides no evidence of inaccuracy.

Also, Stocker has consulted with the City Department of Water and Power regarding water service, including fire flows, and adequate capacity is available in existing water lines.

3. Stocker Would Accept a Condition of Approval that Reflects the Project Design Specification of LEED Gold, Including Tier IV Construction Vehicles.

As previously stated, Stocker proposes and will seek LEED Gold certification. Accordingly, Stocker would accept a condition of approval that reads as follows, or the equivalent thereof:

> "Consistent with the Project design, the Project shall obtain LEED Gold certification including the use of Tier IV-engined construction equipment."

Stocker looks forward to working with the City to realize this development.

Sincerely,



BENJAMIN M. REZNIK and
NEILL E. BROWER of
Jeffer Mangels & Mitchell LLP

BMR:neb
cc: Hon. Marqueece Harris-Dawson (Councilmember.Harris-Dawson@lacity.org)
Adrienne Khorasanee (adrienne.khorasanee@lacity.org)