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SECONDARY SUBMISSIONS



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139 S. Hudson Ave., Suite 200
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VIA E-MAIL

June 22, 2026

City Planning Commission
City of Los Angeles
14410 Sylvan Street
Van Nuys, CA 91401
cpc@lacity.org

**RE: City of Los Angeles – City Planning Commission – Public Hearing –
7528 Bellaire Avenue Project (Agenda Item No. 6) (CPC-2023-7894-GPA-
ZC-CU-SPR-HCA) (ENV-2023-7895-MND)**

Dear City Planning Commission,

On behalf of the Western States Regional Council of Carpenters (“**Western Carpenters**” or “**WSRCC**”), our Office is submitting these comments for the City of Los Angeles (“**City**”) Planning Commission’s (“**Commission**”) public hearing on June 25, 2026 regarding the development project proposed to be located at 7528 North Bellaire Avenue in the City and identified by Case Numbers “CPC-2023-7894-GPA-ZC-CU-SPR-HCA” and “ENV-2023-7895-MND” (“**Project**”).

The Western States Regional Council of Carpenters is a labor union representing almost 90,000 union carpenters in 12 states, including California, and has a strong interest in well-ordered land use planning and in addressing the environmental impacts of development projects.

The Commission describes the proposed Project as involving “[m]ixed-use commercial and residential development with approximately 217,827 square-feet of commercial floor area (i.e., self-storage facility and office) and eight dwelling units totaling 11,980 square feet. The Project Site is currently improved with a vacant single-family residence and two accessory structures/sheds.” (*See* June 25, 2026, City Planning Commission Agenda, Item no. 6, p. 4)

Individual members of the Western Carpenters live, work, and recreate in the City and surrounding communities and would be directly affected by the Project’s environmental impacts.

The Western Carpenters expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearing and proceeding related to this Project. Gov. Code, § 65009, subd. (b); Pub. Res. Code, § 21177, subd. (a); see *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1199-1203; see also *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal.App.4th 1109, 1121.

Moreover, the Western Carpenters requests that the City provide notice for any and all notices referring or related to the Project issued under the California Environmental Quality Act (**CEQA**) (Pub. Res. Code, § 21000 *et seq.*), and the California Planning and Zoning Law (“**Planning and Zoning Law**”) (Gov. Code, §§ 65000–65010). California Public Resources Code Sections 21092.2, and 21167(f) and California Government Code Section 65092 require agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency’s governing body.

I. THE CITY SHOULD REQUIRE THE USE OF A LOCAL WORKFORCE TO BENEFIT THE COMMUNITY’S ECONOMIC DEVELOPMENT AND ENVIRONMENT

The City should require the Project to be built using a local workers who have graduated from a Joint Labor-Management Apprenticeship Program approved by the State of California, have at least as many hours of on-the-job experience in the applicable craft which would be required to graduate from such a state-approved apprenticeship training program, or who are registered apprentices in a state-approved apprenticeship training program.

Community benefits such as local hire can also be helpful to reduce environmental impacts and improve the positive economic impact of the Project. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project site can reduce the length of vendor trips, reduce greenhouse gas emissions, and provide localized economic benefits. As environmental consultants Matt Hagemann and Paul E. Rosenfeld note:

[A]ny local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling.

Workforce requirements promote the development of skilled trades that yield sustainable economic development. As the California Workforce Development Board and the University of California, Berkeley Center for Labor Research and Education concluded:

[L]abor should be considered an investment rather than a cost—and investments in growing, diversifying, and upskilling California’s workforce can positively affect returns on climate mitigation efforts. In other words, well-trained workers are key to delivering emissions reductions and moving California closer to its climate targets.¹

Furthermore, workforce policies have significant environmental benefits given that they improve an area’s jobs-housing balance, decreasing the amount and length of job commutes and the associated greenhouse gas (GHG) emissions. In fact, on May 7, 2021, the South Coast Air Quality Management District found that the “[u]se of a local state-certified apprenticeship program” can result in air pollutant reductions.²

Locating jobs closer to residential areas can have significant environmental benefits. As the California Planning Roundtable noted in 2008:

People who live and work in the same jurisdiction would be more likely to take transit, walk, or bicycle to work than residents of less balanced communities and their vehicle trips would be shorter. Benefits would include potential reductions in both vehicle miles traveled and vehicle hours traveled.³

Moreover, local hire mandates and skill-training are critical facets of a strategy to reduce vehicle miles traveled (VMT). As planning experts Robert Cervero and Michael Duncan have noted, simply placing jobs near housing stock is insufficient to achieve VMT reductions given that the skill requirements of available local jobs must match those held by local

¹ California Workforce Development Board (2020) Putting California on the High Road: A Jobs and Climate Action Plan for 2030 at p. ii, *available at* <https://laborcenter.berkeley.edu/wp-content/uploads/2020/09/Putting-California-on-the-High-Road.pdf>.

² South Coast Air Quality Management District (May 7, 2021) Certify Final Environmental Assessment and Adopt Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions Program, and Proposed Rule 316 – Fees for Rule 2305, Submit Rule 2305 for Inclusion Into the SIP, and Approve Supporting Budget Actions, *available at* <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10>.

³ California Planning Roundtable (2008) Deconstructing Jobs-Housing Balance at p. 6, *available at* <https://cproundtable.org/static/media/uploads/publications/cpr-jobs-housing.pdf>

residents.⁴ Some municipalities have even tied local hire and other workforce policies to local development permits to address transportation issues. Cervero and Duncan note that:

In nearly built-out Berkeley, CA, the approach to balancing jobs and housing is to create local jobs rather than to develop new housing. The city’s First Source program encourages businesses to hire local residents, especially for entry- and intermediate-level jobs, and sponsors vocational training to ensure residents are employment-ready. While the program is voluntary, some 300 businesses have used it to date, placing more than 3,000 city residents in local jobs since it was launched in 1986. When needed, these carrots are matched by sticks, since the city is not shy about negotiating corporate participation in First Source as a condition of approval for development permits.

Recently, the State of California verified its commitment towards workforce development through the Affordable Housing and High Road Jobs Act of 2022, otherwise known as Assembly Bill No. 2011 (“**AB2011**”). AB2011 amended the Planning and Zoning Law to allow ministerial, by-right approval for projects being built alongside commercial corridors that meet affordability and labor requirements. The City should consider utilizing local workforce policies and requirements to benefit the local area economically and to mitigate greenhouse gas, improve air quality, and reduce transportation impacts.

II. THE CITY SHOULD IMPOSE TRAINING REQUIREMENTS FOR THE PROJECT’S CONSTRUCTION ACTIVITIES TO PREVENT COMMUNITY SPREAD OF COVID-19 AND OTHER INFECTIOUS DISEASES

Construction work has been defined as a Lower to High-risk activity for COVID-19 spread by the Occupational Safety and Health Administration. Recently, several construction sites have been identified as sources of community spread of COVID-19.⁵

Western Carpenters recommend that the Lead Agency adopt additional requirements to mitigate public health risks from the Project’s construction activities. Western Carpenters requests that the Lead Agency require safe on-site construction work practices as well as training and certification for any construction workers on the Project Site.

⁴ Cervero, Robert and Duncan, Michael (2006) Which Reduces Vehicle Travel More: Jobs-Housing Balance or Retail-Housing Mixing? *Journal of the American Planning Association* 72 (4), 475-490, 482, available at <http://reconnectingamerica.org/assets/Uploads/UTCT-825.pdf>.

⁵ Santa Clara County Public Health (June 12, 2020) COVID-19 CASES AT CONSTRUCTION SITES HIGHLIGHT NEED FOR CONTINUED VIGILANCE IN SECTORS THAT HAVE REOPENED, available at <https://www.sccgov.org/sites/covid19/Pages/press-release-06-12-2020-cases-at-construction-sites.aspx>.

In particular, based upon Western Carpenters' experience with safe construction site work practices, Western Carpenters recommends that the Lead Agency require that while construction activities are being conducted at the Project Site:

Construction Site Design:

- The Project Site will be limited to two controlled entry points.
- Entry points will have temperature screening technicians taking temperature readings when the entry point is open.
- The Temperature Screening Site Plan shows details regarding access to the Project Site and Project Site logistics for conducting temperature screening.
- A 48-hour advance notice will be provided to all trades prior to the first day of temperature screening.
- The perimeter fence directly adjacent to the entry points will be clearly marked indicating the appropriate 6-foot social distancing position for when you approach the screening area. Please reference the Apex temperature screening site map for additional details.
- There will be clear signage posted at the project site directing you through temperature screening.
- Provide hand washing stations throughout the construction site.

Testing Procedures:

- The temperature screening being used are non-contact devices.
- Temperature readings will not be recorded.
- Personnel will be screened upon entering the testing center and should only take 1-2 seconds per individual.
- Hard hats, head coverings, sweat, dirt, sunscreen or any other cosmetics must be removed on the forehead before temperature screening.
- Anyone who refuses to submit to a temperature screening or does not answer the health screening questions will be refused access to the Project Site.
- Screening will be performed at both entrances from 5:30 am to 7:30 am.; main gate [ZONE 1] and personnel gate [ZONE 2]

- After 7:30 am only the main gate entrance [ZONE 1] will continue to be used for temperature testing for anybody gaining entry to the project site such as returning personnel, deliveries, and visitors.
- If the digital thermometer displays a temperature reading above 100.0 degrees Fahrenheit, a second reading will be taken to verify an accurate reading.
- If the second reading confirms an elevated temperature, DHS will instruct the individual that he/she will not be allowed to enter the Project Site. DHS will also instruct the individual to promptly notify his/her supervisor and his/her human resources (HR) representative and provide them with a copy of Annex A.

Planning

- Require the development of an Infectious Disease Preparedness and Response Plan that will include basic infection prevention measures (requiring the use of personal protection equipment), policies and procedures for prompt identification and isolation of sick individuals, social distancing (prohibiting gatherings of no more than 10 people including all-hands meetings and all-hands lunches) communication and training and workplace controls that meet standards that may be promulgated by the Center for Disease Control, Occupational Safety and Health Administration, Cal/OSHA, California Department of Public Health or applicable local public health agencies.⁶

The United Brotherhood of Carpenters and Carpenters International Training Fund has developed COVID-19 Training and Certification to ensure that Carpenter union members and apprentices conduct safe work practices. The Agency should require that all construction workers undergo COVID-19 Training and Certification before being allowed to conduct construction activities at the Project Site.

Western Carpenters has also developed a rigorous Infection Control Risk Assessment (“ICRA”) training program to ensure it delivers a workforce that understands how to identify

⁶ See also The Center for Construction Research and Training, North America’s Building Trades Unions (April 27 2020) NABTU and CPWR COVID-19 Standards for U.S. Construction Sites, available at https://www.cpwr.com/sites/default/files/NABTU_CPWR_Standards_COVID-19.pdf; Los Angeles County Department of Public Works (2020) Guidelines for Construction Sites During COVID-19 Pandemic, available at https://dpw.lacounty.gov/building-and-safety/docs/pw_guidelines-construction-sites.pdf.

and control infection risks by implementing protocols to protect themselves and all others during renovation and construction projects in healthcare environments.⁷

ICRA protocols are intended to contain pathogens, control airflow, and protect patients during the construction, maintenance and renovation of healthcare facilities. ICRA protocols prevent cross contamination, minimizing the risk of secondary infections in patients at hospital facilities.

The City should require the Project to be built using a workforce trained in ICRA protocols.

III. THE PROJECT MAY NOT RELY ON A MITIGATED NEGATIVE DECLARATION BECAUSE AN ENVIRONMENTAL IMPACT REPORT IS INSTEAD REQUIRED UNDER CEQA

Pursuant to the California Environmental Quality Act (CEQA), the City should require the preparation of a full Environmental Impact Report (EIR) for the proposed Project because it may not rely on Mitigated Negative Declaration (MND) given the substantial development it entails. The Project intends to construct and develop 217,827 square feet of commercial floor area on a single property or site. The subject location currently contains only a single vacant residential home along with two minor accessory sheds. Replacing a single-family home with a massive commercial complex represents substantial and significant development requiring further environmental review and analysis. The sheer scale of the Project's construction could generate unforeseen or unknown impacts regarding ambient air quality and noise pollution. The surrounding neighborhood deserves a comprehensive environmental analysis that only a complete Environmental Impact Report can provide.

The Project's reliance on a Mitigated Negative Declaration is predicated on the flawed assumption that standard mitigation measures will be sufficient to suppress every significant impact associated with the Project. A commercial enterprise spanning over two hundred thousand square feet will undoubtedly create and present several significant impacts on the environment. However, the Project's MND lacks sufficient analysis regarding such impacts, and thus fails to identify all potential mitigation measures. The City Planning Commission must independently scrutinize the Project's self-storage and office components to verify actual baseline conditions at the Project site. Relying entirely on the Project's incomplete MND risks obscuring the Project's full scope of impacts.

⁷ For details concerning Western Carpenters's ICRA training program, *see* <https://www.swmsctf.org/courses/icra-best-practices-in-health-care-construction/>

Lastly, CEQA requires that a full environmental study be prepared whenever a “fair argument” points to unmitigated impacts. Under this standard, a project’s administrative record should conclusively show an absolute absence of any substantial evidence regarding significant impacts. Here, the Project’s immense scale for a multi-story commercial building makes meeting this high legal threshold difficult. Community members and public comments submitted to the Commission have already raised valid points concerning localized traffic inflation and environmental degradation associated with the Project. The City should not approve the Project without a complete environmental review because reliance on an MND is improper.

IV. THE PROJECT IS INCONSISTENT WITH THE CITY’S LAND USE FRAMEWORK AND REQUIRES A ZONE CHANGE THAT WOULD COMPRISE COMMUNITY INTEGRITY

The Project’s requested General Plan Amendment exposes fundamental conflicts with the City’s own established land use and planning framework. Specifically, the Project seeks to eradicate the existing Commercial Manufacturing, Parking Buffer, and Low Residential designations and instead apply a uniform Commercial Manufacturing designation across the entirety of the project site. Such a sweeping change removes critical land use protections designed to shield the neighborhood from industrial encroachment. The local community relies on established designations to maintain a predictable urban environment. Eliminating the buffer zones completely compromises the integrity of these protections as well as undermines the community’s land use vision and goals. The Commission must reject such attempts to circumvent local land use regulations.

The Project’s proposed Zone Change also represents a substantial intensification of existing land use and disruption to existing neighborhood integrity. The Project requires changing the zoning from residential and other classifications to a commercial manufacturing classification. The current designations include RA-1, R1-1, and R2-1 zones. The requested CM-1 classification permits highly disruptive commercial activities directly adjacent to existing households. Introducing industrial-scale storage operations into the existing residential area will permanently alter its character and integrity. The Commission must evaluate the impacts and damage of re-zoning the residential parcels for heavy commercial use. Protecting the residential integrity of the community requires maintaining its current zoning framework.

Lastly, the Project’s goal of eradicating the long-standing low residential and parking buffer protections directly violates the core policies of the Sun Valley – La Tuna Canyon

community plan. The community plan established specific land allocations to preserve environmental quality and resident well-being. Removing these protections disrupts the delicate balance between commercial uses and nearby residences. The neighborhood may suffer from increased commercial exposure without the protection of the designated parking buffer. The City must ensure the Project's consistency with its own land use framework and objectives.

V. THE PROJECT'S REQUEST FOR A CONDITIONAL USE PERMIT CANNOT BE APPROVED WITHOUT ADDITIONAL ENVIRONMENTAL ANALYSIS

The Project's request for a Conditional Use Permit (CUP) also underscores its substantial environmental impacts and cannot be approved without additional analysis thereof. Specifically, the Project requires a CUP because the storage facility would be located within 500 feet of active residential housing. Thus, the City mandates specific review precisely because heavy commercial storage may present harm to residential and other environments. The Project's close proximity to nearby homes and residences guarantees continuous interactions between heavy vehicles and local residents. The City must carefully evaluate the unique operational characteristics of the facility before granting any zoning exceptions.

The Project's operation as a storage facility adjacent to residential dwellings can and will generate environmental impacts, such as unknown aesthetic and acoustic impacts. The standard mitigation measures detailed in the Project's MND fail to address the impacts from the Project's daily commercial operations. For instance, noise impacts from industry and customer vehicles will degrade the peace of nearby residences. The Project's large physical structures will likely also block natural light and impair visual aesthetics. Yet, the Project's MND fails to adequately quantify and address these specific impacts and harms. The City must therefore demand additional environmental review for the Project, including comprehensive acoustic and aesthetic studies to protect the health of neighboring residents.

The Project's combination of commercial offices, new residential units, and a massive storage facility under a single plan creates significant strains on local land use and presents substantial environmental concerns. The Project's proposed layout forces future tenants to reside immediately next to a high-volume commercial facility. The Project's site plan would introduce 11,980 square feet of residential space directly into a heavily commercialized area. Commercial traffic such as trucks and other industrial vehicles will share paths and routes with nearby homeowners and residents entering and exiting their homes. The Project's proposed arrangement maximizes tenant exposure to loading dock noise and diesel exhaust.

However, the City lacks any environmental review or other documentation proving that these mixed uses can coexist and or eliminate impacts to residents. The Commission must ensure that the Project addresses and protects human health and public safety.

VI. THE PROJECT WILL CREATE TRANSIT IMPACTS REQUIRING ADDITIONAL ANALYSIS PRIOR TO APPROVAL

The Project's request for a twenty percent reduction in mandatory vehicle parking will have significant impacts on local transportation. The Project seeks to circumvent the standard parking regulations required by the Los Angeles Municipal Code, specifically by undersupplying the parking infrastructure necessary to support the massive mixed-use complex. Artificially reducing the Project's parking supply below what is typically required will inevitably cause severe transit impacts on the Project site and surrounding communities. The Project will simultaneously introduce office workers, storage customers, and residential occupants to the same site. The eight residential units alone will generate consistent daily parking demands. Commercial storage customers frequently utilize large moving vehicles requiring large parking areas. When insufficient parking is available, large vehicles may foreseeably utilize public areas, block residences, create congestion, or pose a threat to residents.

The traffic analysis used in the Project's Mitigated Negative Declaration fails to capture and explain the full scope of its impacts. For instance, the analysis fails to fully address the Project's traffic delays caused by its twenty percent parking reduction. The Commission must demand a revised traffic study for the Project based on true conditions and accurate data at the site. Approving the Project without additional data or analysis regarding traffic impacts, may permanently compromise transit and traffic safety along Bellaire Avenue.

VII. CONCLUSION

The Commission should direct City Staff and the Project applicant to evaluate and address the issues raised herein prior to advancing the Project.

Should the Commission have any questions or concerns regarding this comment letter, please do not hesitate to contact our office.

Sincerely,



Omar Corona

Attorneys for Western States Regional Council of Carpenters



RE: VTT-73957-HCA-1A; DIR-2019-952-SPP-1A

Donna Asimont <djasimont1@gmail.com>

Mon, Jun 22, 2026 at 2:07 PM

To: CPC@lacity.org

City Planning Commission :: CPC@lacity.org

RE: VTT-73957-HCA-1A; DIR-2019-952-SPP-1A

Dear Members of the Los Angeles City Planning Commission,

Subject: Opposition to Project at 8100-8160 W. McGroarty St. & 10000 N. McVine Terrace (VTT-73957-HCA-1A; DIR-2019-952-SPP-1A); 6/25/26 Meeting Agenda Items 9 & 10

I am writing to express my strong opposition to the proposed 13-lot residential subdivision project located at 8100, 8150, and [8160 West McGroarty Street](#) and [10000 North McVine Terrace](#) (Project). The Commission is scheduled to hear the appeals regarding this project on June 25, 2026, and I urge you to grant the appeal, disapprove the project entitlements, and require a full Environmental Impact Report (EIR).

This Project poses severe risks to our public safety and local environment that the current Mitigated Negative Declaration (MND) completely fails to address:

1. Severe Wildfire Risks and Fire Code Violations

The project site lies entirely within a designated Very High Fire Hazard Severity Zone (VHFHSZ). Neither of the only two access routes to the project complies with State Minimum Fire Safe Regulations or Los Angeles Municipal Code Section 57.4908: Dangerous Roadway Widths: On-street parking along McVine Avenue and McGroarty Street narrows the usable two-way travel lanes to 18–18.5 feet, violating the mandatory 20-foot minimum required for emergency vehicle access and civilian evacuation.

Excessive and Hazardous Grades: Proposed Private Street "A" features a grade reaching up to 21.43%, which exceeds the absolute state limit of 20% and violates the Fire Department's own 15% maximum standard. Inadequate Turnarounds: Private Street "A" does not provide a code-compliant turnaround radius, and Private Street "B" completely dead-ends without any required turnaround or hammerhead.

Procedural Failures: The City has failed to properly notify CAL FIRE or include these mandatory fire-safe standards as conditions of approval. Approving a dense subdivision with non-compliant emergency access creates an unacceptable public safety hazard.

2. Inadequate Environmental Review and Threat to Wildlife

Unstudied Baseline: No protocol-level biological surveys were conducted. The developer relied on a brief, two-hour walk-through that completely missed the blooming periods of local special-status plants.

Threats to Endangered Species: The project site provides suitable habitat for sensitive wildlife—including the genetically unique remnant population of the coast horned lizard, the Crotch's bumble bee, and the mountain lion. The MND fails to properly analyze or mitigate impacts to these species.

Understated Native Tree and Shrub Losses: The project relies on an outdated 2016 tree report, underestimating the number of protected native oaks and sycamores that will be killed by root damage. It also entirely omits impacts on protected toyon and Mexican elderberry shrubs.

Degradation of the Verdugo Mountains SEA: The proposed mitigation measures for the portion of the project inside the Significant Ecological Area (SEA) are vague, deferred, and scientifically proven to be ineffective (such as using relocation tactics with a 95% mortality rate for lizards, and glass regulations that do not prevent bird strikes).

Because the required legal findings for physical suitability and public safety cannot be made on this record, I respectfully request that the Planning Commission uphold the appeal, reject the current map and entitlements, and order a comprehensive Environmental Impact Report.

3. As this household at: 10100 McVine Avenue Sunland CA 91040-3359, would be one of the 'most' affected properties by this forever-altering neighborhood project, these are some of the issues of concern here:

**HEAVY EQUIPMENT RUMBLING CHASING THE RODENTS DOWNHILL
SLOPE DENSITY – TOO MANY BUILDINGS ON A HILLSIDE**

CONSTRUCTION NOISE

**OLIVE TREES – WILL THEY REMAIN, THEY REDUCED NOISE AND DUST
DOWNHILL MUD AND WATER RUNOFF IN THE WET WEATHER, AS BEFORE
EUCALYPTUS TREES ALREADY REMOVED / HOW MANY OTHER TREES TO GO
ONE PERSON'S PLANS UNDOING MANY OTHERS PEACE
LOSS OF OUR QUIETUDE AND UNIQUENESS OF THIS SMALL CORNER
CURBS AND LIGHTS AND SIDEWALKS AND PARKING; THIS IS NOT A CITY HERE
HOW MANY MORE HOMES AHEAD BESIDES THE THIRTEEN?**

Thank you,
Donna Asimont
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Opposition to Project at 8100-8160 W. McGroarty St. & 10000 N. McVine Terrace (VTT-73957-HCA-1A; DIR-2019-952-SPP-1A)

Greg Krueger <gakrueger@mac.com>

Sat, Jun 20, 2026 at 1:59 PM

To: CPC@lacity.org

To: Los Angeles City Planning Commission

RE: Project at **8100-8160 W. McGroarty St. & 10000 N. McVine Terrace (VTT-73957-HCA-1A; DIR-2019-952-SPP-1A)**

As a homeowner adjacent to the above proposed development, I am writing to record my strong opposition to this project. The Commission is scheduled to hear the appeals regarding this project on June 25, 2026.

This project threatens irrevocable environmental change and destruction of the foothills above McGroarty St.

Of more immediate and urgent concern, the proposed project poses **severe risks to our public safety** that the current Mitigated Negative Declaration (MND) completely fails to address, including:

-Severe Wildfire Risks and Fire Code Violations

Neither of the only two access routes to the project complies with State Minimum Fire Safe Regulations or Los Angeles Municipal Code Section 57.4908:

- **Dangerous Roadway Widths:** On-street parking along McVine Avenue and McGroarty Street narrows the usable two-way travel lanes to 18–18.5 feet, violating the mandatory 20-foot minimum required for emergency vehicle access and civilian evacuation.
- **Excessive and Hazardous Grades:** Proposed Private Street "A" features a grade reaching up to 21.43%, which exceeds the absolute state limit of 20% and violates the Fire Department's own 15% maximum standard.
- **Inadequate Turnarounds:** Private Street "A" does not provide a code-compliant turnaround radius, and Private Street "B" completely dead-ends without any required turnaround or hammerhead.
- **Procedural Failures:** The City has failed to properly notify CAL FIRE or include these mandatory fire-safe standards as conditions of approval. Approving a dense subdivision with non-compliant emergency access creates

Approving a dense subdivision with non-compliant emergency access creates an unacceptable public safety hazard.

Because the required legal findings for physical suitability and public safety cannot be made on this record, I respectfully request that the Planning Commission **uphold the appeal, reject the current map and entitlements, and order a comprehensive Environmental Impact Report.**

Thank you,

Greg Krueger

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June 22, 2026

VIA ELECTRONIC MAIL

Honorable President and Members of the
Los Angeles City Planning Commission
200 North Spring Street, Room 272
Los Angeles, CA 90012
cpc@lacity.org

Re: Appellant's Response to the Appeal Recommendation Report (Agenda Items 9 and 10, June 25, 2026 Hearing); 8100, 8150, and 8160 West McGroarty Street and 10000 North McVine Terrace; VTT-73957-HCA-1A; DIR-2019-952-SPP-1A; ENV-2016-2070-MND ("Project")

Dear Honorable President Lawshe and Members of the City Planning Commission:

This firm represents the McGroarty Environmental Review Coalition (the "Association" or "Appellant") in connection with its appeals of the above-referenced Project. We submit this letter in response to the Department of City Planning's Appeal Recommendation Report (the "Report") for the June 25, 2026 hearing, which recommends that the Commission deny the appeals and sustain the approvals of the Vesting Tentative Tract Map and the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan Project Permit Compliance Review. The Report should not be adopted. As shown below, the Report does not respond to the supplemental expert evidence the Association submitted on June 15, 2026, and the two technical exhibits on which the City now relies—the Dudek memorandum (Exhibit C) and the South Environmental letter (Exhibit D)—do not rebut that evidence. Because the Association's expert evidence stands unrebutted in the record, it remains substantial evidence supporting a fair argument that the Project may have a significant effect on the environment. The City therefore may not rely on the Mitigated Negative Declaration ("MND"), the required findings for the two entitlements cannot be made, and an environmental impact report ("EIR") is required.

I. The Report Does Not Respond to the Association’s Supplemental Expert Evidence.

The Report’s “Appeal Points & Staff Response” section answers the points raised in the Association’s original December 2025 appeals. It does not engage the Association’s Supplemental Appeal Justification Letter dated June 15, 2026, or the two expert reports submitted with it: the roadway-geometry report of Brandon Araujo, P.E., and the biological resources report of Scott Cashen, M.S. That omission is dispositive. Under CEQA’s fair argument standard, the question is not whether the City can marshal contrary evidence, but whether the whole record contains substantial evidence supporting a fair argument that the Project may have a significant effect. (Pub. Resources Code, § 21082.2; *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75, 82.) The opinion of a qualified expert, supported by facts, is itself substantial evidence as a matter of law. (Pub. Resources Code, § 21082.2, subds. (a), (c).) The reports of Mr. Araujo and Mr. Cashen are precisely that. The City’s silence does not rebut them; it confirms that this evidence stands unanswered.

II. The Dudek Memorandum Does Not Address the Article 2 Ingress and Egress Standards, and the City’s Position That Conditions and a Later Fire Department Review Will Cure the Defect Is Contrary to Law.

The Report conflates two distinct sets of State Minimum Fire Safe Regulations (the “Regulations,” Cal. Code Regs., tit. 14, § 1270.00 et seq.). The first is the building-and-parcel setback requirement of Section 1276.01(b) (mirrored in Section 608.2.1 of the 2025 California Wildland-Urban Interface Code), which permits reduced setbacks where alternative methods reduce structure-to-structure ignition. The Dudek memorandum addresses only that setback requirement; by its own title it is a “Report on Setback Requirements,” and its analysis is confined to structure-to-structure ignition, hardening features, and inter-structure separation. The second set—the subject of Mr. Araujo’s reports—is the Article 2 ingress and egress standards governing road width, grade, radius, and turnarounds (Cal. Code Regs., tit. 14, §§ 1273.00–1273.09). Dudek says nothing about those standards. The City therefore still has not performed any Article 2 ingress/egress analysis, and the Report’s reliance on Dudek to answer the road-access deficiencies is misplaced.

As to the Article 2 deficiencies, the Report asserts that conditions imposed by the Bureau of Engineering (“BOE”) and the Fire Department resolve the issue and that the Los Angeles Fire Department (“LAFD”) will confirm compliance at a later date. Mr. Araujo’s attached response (Exhibit A) refutes that assertion point by point. The BOE Specific Conditions and the Fire Department conditions apply only to proposed Private Streets “A” and “B”; they do not reach the off-site segments of McVine Avenue, McGroarty Street, and Woodward Avenue that fail the width standard and that emergency apparatus and evacuating residents must use. The tentative map already calls out finished-surface (“FS”) road grades that exceed both BOE’s and the Fire Department’s own 15 percent maximum, so approving the map as drawn would approve a non-compliant grade. The cul-de-sac radius conditions the City cites do not cure the deficient curve radius on Private Street “B,” the absence of any turnaround at the terminus of Private Street “B,” or the deficient turnaround delta angle at the terminus of Private Street “A.” Because the horizontal and vertical alignment of a tentative tract map is effectively final, a later permit inspection cannot redesign roads that are already fixed on an approved map. The time to ensure compliance is now.

Deferral is independently unlawful. Section 1270.04(c) requires the City to ensure that the applicable Regulations “become a condition of approval” of the map itself, at the approval stage. The only lawful mechanism to deviate from the minimum standards is a formal Exception under Section 1270.07. This must be requested in writing, evaluated case-by-case, supported by measures that affirmatively provide the mandatory “Same Practical Effect,” and forwarded to CAL FIRE. None of that occurred. Nor can a Fire Department sign-off substitute for compliance: the Fire Department reviews projects against the City’s own Fire Code and Title 24, which are less protective than the State minimums, and a local ordinance may supersede the Regulations only if it equals or exceeds them (Cal. Code Regs., tit. 14, § 1270.05). Tellingly, Dudek itself confirms that even the setback alternative-method requests “are subject to approval by the [LAFD]” at a later stage—an admission that compliance has not been established and is being deferred, precisely the defect the Association has identified.

Dudek’s own memorandum underscores why approving a non-compliant design would be imprudent as well as unlawful. In its “AM&M Disclaimer,” Dudek acknowledges that “[t]he only condition that can be assumed acceptable is that which complies with the letter of the code,” that the proposed alternative methods are merely “scientifically feasible” with “no guarantee of acceptance by the [Fire Department],” and that “City officials and management, along with the community, may not be willing to accept the risk of approving an AM&M request even if it is scientifically feasible.” Dudek then disclaims responsibility altogether: “Should a person lose their property or life as a result of a failed AM&M approval, Dudek will not be held liable.” That a fire-protection consultant would expressly refuse to stand behind the safety of its own recommendations is a remarkable admission. It confirms that compliance is not assured even as to setbacks, that the only course that can be “assumed acceptable” is one that meets the minimum standards, and that the Commission should not stake public safety on deviations the applicant’s own expert will not defend. And because the Project occupies a parcel of roughly 19 acres, there is ample room to redesign the subdivision to comply with the minimum standards rather than pursue such deviations. The prudent and lawful course is to require compliance now.

III. The Report Does Not Address the the City’s Failure to Notice CAL FIRE Under Section 1270.04(a).

The Association’s supplemental letter squarely raised that the City failed to satisfy the Regulations’ mandatory procedural requirements. Specifically, the obligation under Section 1270.04(a) to provide the Director of CAL FIRE (or designee) with notice of the tentative map application so that CAL FIRE may review it and make fire-protection recommendations, and the obligation under Section 1270.04(c) to make the Regulations conditions of approval. The Report does not address this issue at all. There remains no evidence in the record that CAL FIRE was given the required notice or any opportunity to review the vesting tentative tract map. This is an independent procedural defect that cannot be cured by deferring review to a later permit stage, and it is consistent with the documented, system-wide pattern and practice that is the subject of pending litigation (see *Federation of Hillside & Canyon Assns. v. City of Los Angeles*, LASC No. 25STCP04981; *Girard Tract Community Preservation v. City of Los Angeles*, LASC No. 26STCP01994). The Commission should not perpetuate it here.

IV. The MND Contains No Analysis of the Project's Non-Compliance With the State Minimum Fire Safe Regulations, Which Is Itself a Fair Argument of a Significant Wildfire Impact.

Independent of the findings, the MND fails as an informational document. The MND's wildfire discussion contains no analysis of whether the Project complies with the State Minimum Fire Safe Regulations governing emergency ingress and egress and building siting in a Very High Fire Hazard Severity Zone. These State standards were adopted after extensive consultation with fire professionals to prevent loss of life and property during wildfire. An environmental document that omits any analysis of the Project's compliance with those standards cannot serve as the informed basis for the City's decision. The expert engineering evidence now in the record establishes that the Project does not comply; the MND's silence on that subject is a failure to proceed in the manner required by law and deprives the decision-makers and the public of information CEQA requires them to consider.

That omission also supplies an independent fair argument of a significant impact. Substantial evidence, Mr. Araujo's site-specific engineering analysis, establishes that the Project's only two access routes fail the minimum standards for width, grade, radius, and turnarounds. A subdivision that does not meet the minimum standards designed to reduce wildfire ignition and to allow emergency apparatus to reach the site while residents evacuate presents, at a minimum, a fair argument that it may cause or contribute to a significant wildfire and public-safety impact. Compounding the defect, the Regulations were never imposed as conditions of approval or as mitigation measures, as Section 1270.04(c) requires. The MND neither analyzes this impact nor mitigates it. Under the fair argument standard, that alone requires an EIR.

V. The South Environmental Letter Predates—and Does Not Engage—the Cashen Report, and Mr. Cashen's Unrebutted Opinion Establishes a Fair Argument.

The Report's entire biological rebuttal rests on the South Environmental letter (Exhibit D). That letter cannot bear the weight the City places on it, for two independent reasons. First, it is dated March 30, 2026. This is more than two months before Mr. Cashen's June 14, 2026 report and the Association's June 15, 2026 submission. On its face, it could not have reviewed Mr. Cashen's analysis. By its own terms it responds only to the earlier "Channel Law Group Justification Appeal" comment letter, and only on the single subject of oak woodlands. Second, and as a result, it does not engage the great majority of Mr. Cashen's opinions, which the Report likewise ignores.

Mr. Cashen, a senior biologist with 32 years of experience on more than 250 projects, identified numerous independent deficiencies, each of which supports a fair argument of a significant effect. Neither South Environmental nor the Report addresses any of the following: (1) the failure to establish an adequate environmental baseline, where the applicant's consultant conducted only a two-hour reconnaissance survey rather than the protocol-level surveys required by CDFW and the City's own Biological Reporting Standards, and relied solely on the CNDDB, a positive-detection database that cannot establish species absence; (2) the unsupported "no suitable habitat" determinations for the state-listed endangered San Fernando Valley spineflower, California satintail, the coast horned lizard, the silvery and Southern California legless lizards, the coastal whiptail, the California glossy snake, the San Diego black-tailed jackrabbit, and the hoary

bat; (3) the complete failure to analyze the Crotch's bumble bee (a CESA candidate for which CDFW's own comment letter confirms potential habitat), the mountain lion (CESA-threatened, with the site classified by the City as having "high" potential), and several special-status bat species; (4) the outdated 2016 Protected Tree Report and the absence of any root-zone analysis for "retained" trees that the ordinance's own definition of "removal" would treat as removed; (5) the failure to map, quantify, or mitigate protected toyon and Mexican elderberry shrubs; (6) deferred and ineffective mitigation, including MM BIO-6 (plants) and MM BIO-7 (wildlife)—the latter relying on capture-and-relocation that the scientific literature shows fails, with translocated horned lizards exhibiting survival rates as low as five percent, and gnatcatcher measures that omit the required six breeding-season protocol surveys; and (7) a conclusory cumulative-impacts analysis that identifies no related projects. Each deficiency, standing alone, is substantial evidence supporting a fair argument.

Even on the single topic South Environmental did address, its disagreement does not defeat a fair argument. The relevant question is whether substantial evidence supports that the Project may have a significant effect; it is not whether the City also possesses contrary evidence. (*No Oil*, supra, 13 Cal.3d at p. 75.) South's contrary opinion regarding oak woodlands merely creates the very evidentiary conflict that compels preparation of an EIR; it does not negate Mr. Cashen's opinion that replacement-tree planting does not mitigate the permanent loss of habitat and canopy to a less-than-significant level. And as to the many issues South never addressed, the record contains no contrary evidence at all; only Mr. Cashen's unrebutted expert opinion.

VI. The Required Findings for Both Entitlements Cannot Be Made.

Each finding required for an entitlement must be supported by substantial evidence that bridges the analytic gap between the evidence and the decision. (*Topanga Assn. for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 515.) The unrebutted expert evidence forecloses the findings here. For the Vesting Tentative Tract Map (Gov. Code, § 66474; LAMC § 17.06), the City cannot find that the site is physically suitable for the type of development (§ 66474, subd. (c)) or that the design will not cause serious public health problems (§ 66474, subd. (f)) when the only two access routes fail the State minimum fire-safe ingress and egress standards in a Very High Fire Hazard Severity Zone; cannot find the absence of substantial environmental damage or injury to wildlife and their habitat (§ 66474, subd. (e)) in light of Mr. Cashen's analysis; and cannot find consistency with the applicable general and specific plans (§ 66474, subds. (a), (b)). The related Adjustment for proposed Lot 7 (LAMC § 17.03) fails for the same reasons. For the Specific Plan Project Permit Compliance Review (LAMC § 11.5.7 C.2), the City cannot find that a Project violating the State fire-safe Regulations and threatening the very oak woodland and Significant Ecological Area resources the Specific Plan exists to protect "substantially complies" with that Plan, nor that its deferred and ineffective measures adequately mitigate the Project's effects. Even if the Commission purported to make these findings, they would lack substantial-evidence support in light of the expert analysis in the record.

VII. CEQA Independently Requires Preparation of an EIR.

Because the record now contains substantial evidence supporting a fair argument that the Project may have a significant effect (both the engineering evidence bearing on wildfire and public-safety access and the biological evidence bearing on special-status species, oak woodland

habitat, and the Verdugo Mountains Significant Ecological Area) the City may not rely on the MND or on its determination under CEQA Guidelines Sections 15162 and 15164, and must prepare an EIR before approving any entitlement. The City's own June 2024 Local Hazard Mitigation Plan adopts, as a wildfire mitigation best practice, the measure "[e]nsure compliance with State Minimum Fire Safe Regulations." Having adopted that practice to reduce risk to new and redeveloped structures, the City cannot rationally find that a Project contravening the Regulations has no significant wildfire impact.

For the foregoing reasons, and those stated in the Association's original appeals and its June 15, 2026 supplemental letter (which are incorporated herein by reference), the Association respectfully requests that the Commission grant the appeals, disapprove the entitlements (VTT-73957-HCA and DIR-2019-952-SPP) and the related Adjustment for Lot 7, set aside Mitigated Negative Declaration No. ENV-2016-2070-MND, and direct the preparation of an environmental impact report.

Thank you for your consideration of this matter. I may be contacted at jamie.hall@channellawgroup.com if you have any questions, comments, or concerns.

Sincerely,



Jamie T. Hall

Enclosure:

Exhibit A — Response to the City's Recommendation Report (Article 2 Ingress and Egress), Brandon Araujo, P.E., dated June 21, 2026

Exhibit A

June 21, 2026

Project Number 26-03

Attention: Jamie Hall
Channel Law Group
8383 Wilshire Boulevard, Suite 750
Beverly Hills, CA 90211

SUBJECT: The City of Los Angeles' Recommendation Report, Case No. VTT-73947-HCA-1A

Dear Mr. Hall,

My report found five types of deficiencies with respect to the subject vesting tentative tract map's failure to comply with Article 2 of the State Minimum Fire Safe Regulations ("Regulations"). Those types of deficiencies concern the Regulation's requirements with respect to road width, grade, radius, presence of turnarounds, and turnaround dimensions.

Width

With respect to width, I found that while the roads to be built as a part of the proposed project, what I referred to in my report as Private Street "A" and Private Street "B," did meet the Regulations requirements with respect to width, the roads that lead up to Private Streets "A" and "B", did not. Specifically, McVine Avenue from Apperson Street to McGroarty Street, McGroarty Street, and Woodward Avenue for approximately 300 feet north of McGroarty Street, do not meet the Regulations' requirements with respect to width.

The City claims that a number of Bureau of Engineering ("BOE") Specific Conditions for the project address this deficiency. They do not. BOE's Specific Conditions for this project are limited to Private Streets "A" and "B." They do not pertain to the segments of McVine Avenue, McGroarty Street, or Woodward Avenue identified in my report. The City also claims that the Fire Department's Conditions of Approval require a 20-foot-wide fire lane. Again, the Fire Department's Conditions of Approval apply to Private Streets "A" and "B." They do not pertain to the deficient road segments I identified in my report.

If one were to argue that the Regulations only apply to the roads being built as a part of this project, it should be noted that per § 1273.00, Intent, of the Regulations:

Roads, and Driveways, whether public or private, unless exempted under 14 CCR § 1270.03(d), shall provide for safe access for emergency Wildfire equipment and civilian

evacuation concurrently, and shall provide unobstructed traffic circulation during a Wildfire emergency consistent with 14 CCR §§ 1273.00 through 1273.09.

If a wildfire were to originate at the Project location, emergency Wildfire equipment and civilian evacuation will most likely utilize McVine Avenue, McGroarty Street, and Woodward Avenue which is why I evaluated them with respect to the Regulations.

Grade

The deficiencies that I identified in my report with respect to grade are currently proposed for Private Streets “A” and “B.” While it is true that both BOE and the Fire Department place a limitation on road grade as a condition of approval, the vesting tentative tract map calls out road elevations as “FS” which is an abbreviation for “finish surface”—the proposed final elevation of the road. . If the vesting tentative tract map were to be approved as it exists currently, the City Planning Commission would be approving a road grade that does not meet BOE’s nor the Fire Department’s standards for grade.

Radius

The deficiency that I identified in my report with respect to radius is currently proposed for Private Street “B.” A snapshot of the deficiency is located below:



Figure 1. Snapshot of Vesting Tentative Tract Map (Source: Martirosian, Hayk. 2019)

The City claims that “the project complies with [this requirement] through BOE Special Conditions No. 2 and 3 which require a ’40-foot minimum radius property easement cul-de-sac at the terminus.” This condition pertains to the minimum radius of a cul-de-sac. It does not pertain to the deficiency I identified above with respect to Private Street “B.”

Presence of Turnarounds

The deficiency that I identified in my report with respect to the presence of turnarounds concerns the lack of turnaround provided at the terminus of Private Street "B." The horizontal layout of the road(s) proposed on a tentative tract are typically final. The City claims that the BOE's and Fire Department's conditions of approval require a suitable turnaround at the terminus of this road. However, if the vesting tentative tract map were to be approved as it exists currently, the City Planning Commission would be approving a road configuration that does not meet the Regulations' requirements for turnarounds. Requiring the project to meet these standards (as well as BOE's and the Fire Department's conditions of approval) would have a large impact on the horizontal and vertical alignment of Private Street "B" and lead to a foundational change to the vesting tentative tract map. The vesting tentative tract map should be revised to address this deficiency prior to the City Planning Commission's approval.

Turnaround Dimensions

The deficiency that I identified in my report with respect to turnaround dimensions concerns the dimensions of the turnaround provided at the terminus of Private Street "A." The City claims that "the project complies with [this requirement] through BOE Special Conditions No. 2 and 3 which require a '40-foot minimum radius property easement cul-de-sac at the terminus.'" While this condition meets the Regulations' requirements with respect to the *radius* of the turnaround, it does not address Regulations' requirements with respect to the *delta angle* of the turnaround. Figure A of 1273.05 of the Regulations show required turnaround dimensions other than radius. The BOE Special Conditions No. 2 and 3 do not address these other dimensions and the turnaround provided at the terminus of Private Street "A" does not meet them.

Summary

For the reasons outlined above, it is my professional opinion that the Project remains in non-compliance with the State Minimum Fire Safe Regulations.

Sincerely,



Brandon Araujo, P.E.
R.C.E 75996





RE: VTT-73957-HCA-1A; DIR-2019-952-SPP-1A

Myke Muller <duhbizz@gmail.com>

Mon, Jun 22, 2026 at 9:13 PM

To: CPC@lacity.org

City Planning Commission

RE: VTT-73957-HCA-1A; DIR-2019-952-SPP-1A

Dear Members of the Los Angeles City Planning Commission,

Subject: Opposition to Project at **8100-8160 W. McGroarty St.** & 10000 N. McVine Terrace (VTT-73957-HCA-1A; DIR-2019-952-SPP-1A); 6/25/26 Meeting Agenda Items 9 & 10

I am writing to express my strong opposition to the proposed 13-lot residential subdivision project located at 8100, 8150, and **8160 West McGroarty Street** and **10000 North McVine Terrace** (Project). The Commission is scheduled to hear the appeals regarding this project on June 25, 2026, and I urge you to grant the appeal, disapprove the project entitlements, and require a full Environmental Impact Report (EIR).

This Project poses severe risks to our public safety and local environment that the current Mitigated Negative Declaration (MND) completely fails to address:

1. Severe Wildfire Risks and Fire Code Violations

The project site lies entirely within a designated Very High Fire Hazard Severity Zone (VHFHSZ). Neither of the only two access routes to the project complies with State Minimum Fire Safe Regulations or Los Angeles Municipal Code Section 57.4908: Dangerous Roadway Widths: On-street parking along McVine Avenue and McGroarty Street narrows the usable two-way travel lanes to 18–18.5 feet, violating the mandatory 20-foot minimum required for emergency vehicle access and civilian evacuation.

Excessive and Hazardous Grades: Proposed Private Street "A" features a grade reaching up to 21.43%, which exceeds the absolute state limit of 20% and violates the Fire Department's own 15% maximum standard. Inadequate Turnarounds: Private Street "A" does not provide a code-compliant turnaround radius, and Private Street "B" completely dead-ends without any required turnaround or hammerhead.

Procedural Failures: The City has failed to properly notify CAL FIRE or include these mandatory fire-safe standards as conditions of approval. Approving a dense subdivision with non-compliant emergency access creates an unacceptable public safety hazard.

2. Inadequate Environmental Review and Threat to Wildlife

Unstudied Baseline: No protocol-level biological surveys were conducted. The developer relied on a brief, two-hour walk-through that completely missed the blooming periods of local special-status plants.

Threats to Endangered Species: The project site provides suitable habitat for sensitive wildlife—including the genetically unique remnant population of the coast horned lizard, the Crotch's bumble bee, and the mountain lion. The MND fails to properly analyze or mitigate impacts to these species.

Understated Native Tree and Shrub Losses: The project relies on an outdated 2016 tree report, underestimating the number of protected native oaks and sycamores that will be killed by root damage. It also entirely omits impacts on protected toyon and Mexican elderberry shrubs.

Degradation of the Verdugo Mountains SEA: The proposed mitigation measures for the portion of the project inside the Significant Ecological Area (SEA) are vague, deferred, and scientifically proven to be ineffective (such as using relocation tactics with a 95% mortality rate for lizards, and glass regulations that do not prevent bird strikes).

Because the required legal findings for physical suitability and public safety cannot be made on this record, I respectfully request that the Planning Commission uphold the appeal, reject the current map and entitlements, and order a comprehensive Environmental Impact Report.

3. As this household at: **10100 McVine Avenue Sunland CA 91040-3359**, would be one of the 'most' affected properties by this forever-altering neighborhood project, these are some of the issues of concern here:

HEAVY EQUIPMENT RUMBLING CHASING THE RODENTS DOWNHILL
SLOPE DENSITY – TOO MANY BUILDINGS ON A HILLSIDE

CONSTRUCTION NOISE

**OLIVE TREES – WILL THEY REMAIN, THEY REDUCED NOISE AND DUST
DOWNHILL MUD AND WATER RUNOFF IN THE WET WEATHER, AS BEFORE
EUCALYPTUS TREES ALREADY REMOVED / HOW MANY OTHER TREES TO GO
ONE PERSON'S PLANS UNDOING MANY OTHERS PEACE
LOSS OF OUR QUIETUDE AND UNIQUENESS OF THIS SMALL CORNER
CURBS AND LIGHTS AND SIDEWALKS AND PARKING; THIS IS NOT A CITY HERE
HOW MANY MORE HOMES AHEAD BESIDES THE THIRTEEN?**

Thank you,
Michael Muller
10100 McVine Avenue
Sunland CA 91040-3359

Hannah Simon
Legal Assistant
Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 90211
Office Phone No. (310) 347-0050
Direct Phone No. (424) 276-7263
Fax: (323) 723-3960
admin@channellawgroup.com





Opposition to Project at 8100-8160 W. McGroarty St. & 10000 N. McVine Terrace (VTT-73957-HCA-1A; DIR-2019-952-SPP-1A); 6/25/26 Meeting Agenda Items 9 & 10

rbelofsky@gmail.com <rbelofsky@gmail.com>

Fri, Jun 19, 2026 at 8:58 PM

To: CPC@lacity.org

Dear Members of the Los Angeles City Planning Commission:

My name is Rachel Belofsky and I am a resident of Sunland.

I am writing to express my strong opposition to the proposed 13-lot residential subdivision project located at 8100, 8150, and [8160 West McGroarty Street](#) and [10000 North McVine Terrace](#) (Project). The Commission is scheduled to hear the appeals regarding this project on June 25, 2026, and **I urge you to grant the appeal, deny the project, disapprove the project entitlements, and require a full Environmental Impact Report (EIR).**

This Project poses severe risks to our public safety and local environment that the current Mitigated Negative Declaration (MND) completely fails to address:

1. Severe Wildfire Risks and Fire Code Violations

The project site lies entirely within a designated Very High Fire Hazard Severity Zone (VHFHSZ). Neither of the only two access routes to the project complies with State Minimum Fire Safe Regulations or Los Angeles Municipal Code Section 57.4908:

- **Dangerous Roadway Widths:** On-street parking along McVine Avenue and McGroarty Street narrows the usable two-way travel lanes to 18–18.5 feet, violating the mandatory 20-foot minimum required for emergency vehicle access and civilian evacuation.
- **Excessive and Hazardous Grades:** Proposed Private Street "A" features a grade reaching up to 21.43%, which exceeds the absolute state limit of 20% and violates the Fire Department's own 15% maximum standard.
- **Inadequate Turnarounds:** Private Street "A" does not provide a code-compliant turnaround radius, and Private Street "B" completely dead-ends without any required turnaround or hammerhead.
- **Procedural Failures:** The City has failed to properly notify CAL FIRE or include these mandatory fire-safe standards as conditions of approval. Approving a dense subdivision with non-compliant emergency access creates an unacceptable public safety hazard.

2. Inadequate Environmental Review and Threat to Wildlife

- **Unstudied Baseline:** No protocol-level biological surveys were conducted. The developer relied on a brief, two-hour walk-through that completely missed the blooming periods of local special-status plants.

- **Threats to Endangered Species:** The project site provides suitable habitat for sensitive wildlife—including the genetically unique remnant population of the coast horned lizard, the Crotch's bumble bee, and the mountain lion. The MND fails to properly analyze or mitigate impacts to these species.
- **Understated Native Tree and Shrub Losses:** The project relies on an outdated 2016 tree report, underestimating the number of protected native oaks and sycamores that will be killed by root damage. It also entirely omits impacts on protected toyon and Mexican elderberry shrubs.
- **Degradation of the Verdugo Mountains SEA:** The proposed mitigation measures for the portion of the project inside the Significant Ecological Area (SEA) are vague, deferred, and scientifically proven to be ineffective (such as using relocation tactics with a 95% mortality rate for lizards, and glass regulations that do not prevent bird strikes).

Considering the horrific fires in Altadena and Pacific Palisades, it would be insane to allow building development on McGroarty.

We cannot discuss development on these hillsides without confronting their recent history. In September 2017, the La Tuna Fire—the largest wildfire in Los Angeles history at the time—ravaged the Verdugo Mountains. Residents along McGroarty and McVine watched the fire line crest those very ridges and burn directly down into our neighborhood. (see attached photo) The terrain above us isn't just scenic; it is a high-risk wildfire corridor.

Allowing high-density or high-impact construction on this hillside ignores several critical safety realities:

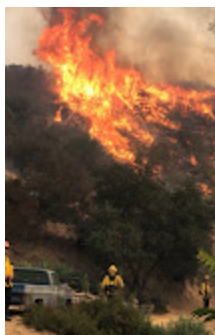
- **High-Risk Evacuation Bottlenecks:** The narrow, winding lanes of our hillside pocket—including Eldora, McVine, and McGroarty—are already incredibly difficult to navigate during an emergency. In 2017, evacuation was a matter of minutes. Adding more structures and vehicles to these limited ingress/egress routes is a recipe for catastrophe when the next fire strikes. Residents were stuck in gridlock traffic when they tried to flee in 2017.
- **Severe Erosion and Mudslide Threats:** The 2017 fire completely stripped these hillsides of their native chaparral, exposing the fragile soil. Heavy development disrupts the remaining root systems, drastically increasing the risk of devastating mudslides and debris flows onto the homes below during the winter rains just like the ones that occurred following the 2017 fire. Rivers of mud flowed down from the hillsides burying some front yards on McGroarty / Woodward as well as McVine / McGroarty.
- **The "Wildland-Urban Interface" Danger:** Pushing further up into the undeveloped hillside expands the Wildland-Urban Interface (WUI), putting more lives directly in the line of fire and placing an unsustainable burden on our local LAFD stations.

The slopes above McVine and McGroarty are a natural buffer that protects our community. History has already given us a definitive warning about what happens when these hillsides burn. I urge the Commission to prioritize public safety over developer profit and **deny** this project.

Because the required legal findings for physical suitability and public safety cannot be made on this record, I respectfully request that the Planning Commission uphold the appeal, reject the current map and entitlements, and order a comprehensive Environmental Impact Report.

Thank you.

Rachel Belofsky – Sunland Resident



FireMcVineMcGroarty.jpg
119K



Opposition to Project at 8100-8160 W. McGroarty St. & 10000 N. McVine Terrace (VTT-73957-HCA-1A; DIR-2019-952-SPP-1A); 6/25/26 Meeting Agenda Items 9 & 10

Robert Brennan <rbrennan@brennanlaw.com>
To: "CPC@lacity.org" <CPC@lacity.org>
Cc: Robert Brennan <rbrennan@brennanlaw.com>

Sat, Jun 20, 2026 at 8:03 AM

Dear Members of the Los Angeles City Planning Commission:

I am writing to express my strong opposition to the proposed 13-lot residential subdivision project located at 8100, 8150, and [8160 West McGroarty Street](#) and 10000 North McVine Terrace (Project). The Commission is scheduled to hear the appeals regarding this project on June 25, 2026, and **I urge you to grant the appeal, deny, the project, disapprove the project entitlements, and require a full Environmental Impact Report (EIR).**

This Project poses severe risks to our public safety and local environment that the current Mitigated Negative Declaration (MND) completely fails to address:

1. Severe Wildfire Risks and Fire Code Violations

The project site lies entirely within a designated Very High Fire Hazard Severity Zone (VHFHSZ). Neither of the only two access routes to the project complies with State Minimum Fire Safe Regulations or Los Angeles Municipal Code Section 57.4908:

- **Dangerous Roadway Widths:** On-street parking along McVine Avenue and McGroarty Street narrows the usable two-way travel lanes to 18–18.5 feet, violating the mandatory 20-foot minimum required for emergency vehicle access and civilian evacuation.
- **Excessive and Hazardous Grades:** Proposed Private Street "A" features a grade reaching up to 21.43%, which exceeds the absolute state limit of 20% and violates the Fire Department's own 15% maximum standard.
- **Inadequate Turnarounds:** Private Street "A" does not provide a code-compliant turnaround radius, and Private Street "B" completely dead-ends without any required turnaround or hammerhead.
- **Procedural Failures:** The City has failed to properly notify CAL FIRE or include these mandatory fire-safe standards as conditions of approval. Approving a dense subdivision with non-compliant emergency access creates an unacceptable public safety hazard.

2. Inadequate Environmental Review and Threat to Wildlife

- **Unstudied Baseline:** No protocol-level biological surveys were conducted. The developer relied on a brief, two-hour walk-through that completely missed the blooming periods of local special-status plants.
- **Threats to Endangered Species:** The project site provides suitable habitat for sensitive wildlife—including the genetically unique remnant population of the coast horned lizard, the Crotch's bumble bee, and the mountain lion. The MND fails to properly analyze or mitigate impacts to these species.
- **Understated Native Tree and Shrub Losses:** The project relies on an outdated 2016 tree report, underestimating the number of protected native oaks and sycamores that will be killed by root damage. It also entirely omits impacts on protected toyon and Mexican elderberry shrubs.

- Degradation of the Verdugo Mountains SEA: The proposed mitigation measures for the portion of the project inside the Significant Ecological Area (SEA) are vague, deferred, and scientifically proven to be ineffective (such as using relocation tactics with a 95% mortality rate for lizards, and glass regulations that do not prevent bird strikes).

3. Inadequate evaluation of traffic and safety along McGroarty and adjacent streets.

As it presently exists, McGroarty is a relatively quiet street with minimal traffic, which is used by the neighborhood children for playing and riding their bikes, along with the adult residents for walking, jogging, bike riding, etc. Because of recent (last 10-15 years) developments, the street is already getting more crowded than when I moved into this neighborhood 25 years ago. Adding more homes will increase the traffic volume along what is already a rural street in a rural neighborhood, making it less safe for the people who live here. There is also the issue of parking—there is effectively no parking along much of McGroarty, and adding the homes will exacerbate the parking issues.

4. Destruction of rural lifestyle along McGroarty Ave.

The people who live in our community tend to stay for a long time and not move, because it is a beautiful rural setting, while still being relatively near Pasadena, Burbank, Glendale and downtown LA. There is a lot of open space and a lot of wildlife—there is a large population of peacocks in our neighborhood, and we have owls, foxes, coyotes, plenty of rabbits and squirrels and the occasional deer sighting. I am sure that the open spaces we enjoy here, along with open spaces in several other parts of LA, are all being eyed by developers who could care less about neighborhood quality or any issues of home affordability or the homelessness crisis the city finds itself in, but the developers want to go in, make a fast buck and then take a vacation at their ranch home in Idaho or on their second yacht. But, they don't live here, never have and never will, and they usually don't pay taxes here. I say, send 'em down the road, Make them find blighted structures already existing in less privileged areas of the city, and improve those into new apartments or condos, and include some structures to help ease the homeless issue. Letting these greedy carpetbagger developers come in and destroy our most beautiful rural neighborhoods with their ugly McMansions is both shortsighted and just plain wrong.

Because the required legal findings for physical suitability and public safety cannot be made on this record, I respectfully request that the Planning Commission uphold the appeal, reject the current map and entitlements, and order a comprehensive Environmental Impact Report.

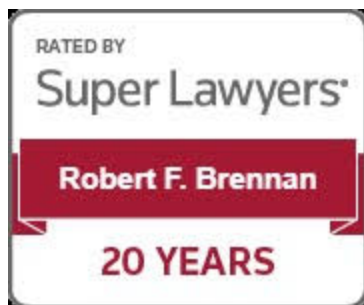
Thank you.

Bob Brennan

Bob Brennan

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Screenshot of Merlin ap...

House Finch

+ 3 more...

2025-09-02 0856

0:36 - Los Angeles, CA - 2 Sep 2025, 8:56 AM

Lesser Goldfinch

House Sparrow

Northern House Wren

2025-08-30 1831

1:40 - Los Angeles, CA - 30 Aug 2025, 6:31...

Oak Titmouse

House Finch

Hairy Woodpecker

2025-08-28 1110

2:55 - Los Angeles, CA - 28 Aug 2025, 11:10...

Mourning Dove

Yellow Warbler

Anna's Hummingbird

Allen's Hummingbird

House Sparrow

+ 1 more...

2025-08-13 0852

0:16 - Los Angeles, CA - 13 Aug 2025, 8:52...

June 20, 2026

RE: Opposition to Project at 8100-8160 W. McGroarty St. & 10000 N. McVine Terrace (VTT-73957-HCA-1A; DIR-2019-952-SPP-1A); 6/25/26 Meeting Agenda Items 9 & 10

Dear Members of the Los Angeles City Planning Commission:

We own seven (7) properties on McGroarty Street, less than one mile from the proposed project.

I am writing to express my strong opposition to the proposed 13-lot residential subdivision project located at 8100, 8150, and 8160 West McGroarty Street and 10000 North McVine Terrace (Project). The Commission is scheduled to hear the appeals regarding this project on June 25, 2026, and **I urge you to grant the appeal, deny the project, disapprove the project entitlements, and require a full Environmental Impact Report (EIR).**

In addition to supporting the appeal and comments submitted by the McGroarty Environmental Review Coalition, I offer additional comments here.

Please note we are not making these statements with the intent of insulting anyone personally and are not accusing anyone of wrong doing. People have different perspectives. Rather, these are comments and objections based on real world personal experiences living here in Tujunga for many years, and observing first-hand what happens, what gets enforced and, most importantly, what does not get enforced in Los Angeles (in the context of relying upon stated mitigation measures), and by applying objective inquiry and rational thought. This is from a perspective of genuine concern over matters of safety, degradation of the environment, and loss of resources essential to the unique character of this community area.

In summary, with additional details following:

- 1) Full EIR should be required. Flawed assumptions, insufficient review, and some mitigation measures only “in theory” enforceable, not real world, failure to fully evaluate cumulative impacts, cultural resources, recreational resources, biological resources, nighttime light glare. Prior proposed projects nearby in similar setting required full EIR (example: TT-62557 / ENV 2005-4709 MND). This may set new [negative impact] precedent.
- 1) Significant disturbance, grading and infrastructure with all the short-term and long-term impacts, to serve a very small set of houses/people. Development should be concentrated in lower areas (with existing disturbance), perhaps smaller houses.
- 2) Per determination letter, reiterating that Slope Density ordinance must be respected, density limited accordingly. Ordinance 172231 was previously implemented to

update/correct the zoning on both sides of McGroarty Street relative to the slope density, in response to some earlier inconsistencies. In current context and trends, in light of ADU laws, actual density will be higher than the nominal density approved.

- 3) Public safety, fire safety, high wind area, significantly increased chances of fire ignition in difficult terrain. Loss of existing buffer which has historically served this community well in that context - providing ample opportunities to evade fire in difficult terrain (evidenced by La Tuna Fire 2017).
- 4) Insufficient (lack of) communication through neighborhood council at the MND preparation phase. (NC stated not notified at time of MND preparation).
- 5) Some inconsistencies in some of the documents were noticed, causing concern relative to overall accuracy and attention to details in the process. **CEQAnet posting** on CA.GOV shows **Address incorrectly described**: 8100-8600 W. McGroarty Street, 10000 N. McVine Terrace 91040. **APN incorrectly listed**: 2559032003, **2562006005**. **Names differ on some of the documents** such as how listed on determination letter, how title held, etc.

Carving into the few remaining areas of high quality biological and scenic resources, adding more infrastructure just to build a couple of extra large houses, doesn't seem to be consistent with goals to build more affordable housing, or with the goals to protect biological, scenic and recreational resources. **It seems like the houses could be smaller and clustered more in previously disturbed area while significantly reducing the impact to the environment and others here.**

In particular, two houses proposed on the Southerly section of the project, highest elevation, are going to require substantial grading and infrastructure, also impacting the S.E.A., just to effectively provide a big house with a big view to a very small set of people.

I believe that there were flawed assumptions, insufficient review, and reliance upon some "theoretical" mitigation measures (without material evidence to support effectiveness), that resulted in the MND being accepted in lieu of an EIR. This project is going to have lasting negative impacts to the neighborhood/surrounding environment, beyond those which were evaluated or just theoretically mitigated by simply declaring something as "enforceable" without any real world demonstrated enforcement.

The "Canyon Hills" project in 2005, (VTT 61672-2A and ENV-2002-2481-ENV) on the South side of the Verdugos already means "squeezing" biological resources into other adjacent areas.

Therefore, this project must be viewed in the context of these either proposed or approved projects, and perhaps a precedent for future projects.

In discussing the project, the staff report states (page 57) “nor is it a “buffer” between natural habitat and existing development because a portion of the project site is already developed”. That is not necessarily correct. **Looking at the extent of the current development compared to the proposed development, there most definitely is still a current “buffer” between natural habitat and existing development**, particularly when you consider how far up the slope now the proposed last two houses will be located on the Southern edge, and how much of that “buffer” will now be reduced.

On the subject of cultural and recreational/scenic resources, you really cannot separate this from the environment here. McGroarty Street, relatively short in overall context, has always been inextricably linked to the cultural and natural heritage here. John Steven McGroarty, wrote his column in the Los Angeles Times for over 40 years “Seen from the Green Verdugo Hills”. The unique character of this region was recognized and appreciated by the early settlers which included McGroarty, for whom La Manzanita Drive was renamed upon annexation to Los Angeles (previously the City of Tujunga). **Whether or not something has been “officially recognized” as a cultural resource doesn’t mean it doesn’t exist in the community context, and isn’t an actual bona fide cultural resource.** It’s a shame that there weren’t better efforts to identify and officially recognize some of the resources in the City of Los Angeles, as a stated goal in the Community Plan. Yes, there are also a number of historic “buildings” and sites here on McGroarty Street that have not been officially recognized. We actually own one of them which was identified as a candidate by the Los Angeles Cultural Heritage Commission. It was built by an artist in 1930 who actually resided at the “Little High House” of McGroarty while the house was being built, just before annexation to Los Angeles. **There is much more to McGroarty Street than just the McGroarty residence or the Cross of San Ysidro. It’s actually the setting, the environment along McGroarty Street which is now the most precious and threatened of the historic cultural resources.** The Cross of San Ysidro stands sentinel but it’s really more than just that cross. **It’s also the Verdugos overlooking, protecting by providing the buffer**, and providing the beauty and ample natural resources for us to enjoy, providing some serenity seldom afforded. Every single day we have so many people walking, bicycling, running, strolling the extent of McGroarty Street. There is some youth group that mentors young runners in Los Angeles, and they use McGroarty Street constantly for years. **This is truly a rare recreational resource here.**

Construction traffic impacts and longer term traffic impacts:

The majority of McGroarty Street is no more than 20 feet wide, at best, some of it still not fully improved with curbs and gutters, with vehicles running on the edges of the asphalt and constantly breaking and degrading it, narrowing the usable paved area even further. While I pity the people there at McVine and McGroarty, I’m also really concerned about these large

trucks and general construction traffic utilizing the full extent of McGroarty Street to “shortcut” vs using larger streets and boulevards. **The Haul Route should exclude sections of McGroarty beyond immediate streets such as due to the significant safety issues which will result from trucks and other construction traffic speeding through these narrow hillside streets in either direction, often with blind curves.** Again, every single day we have so many people walking, bicycling, running, strolling the extent of McGroarty Street. **This is going to create significantly more safety hazards and effectively will probably eventually eliminate this recreational resource.**

On the general subject of biological resource impact mitigation measures:

This north-facing extent of the Verdugos in Sunland-Tujunga, with the moisture-retaining canyons, contain high concentration/variety of plants and animals, and is a somewhat unique convergence of Oak Woodland/Foothill Woodland, Coastal Sage Scrub. The **biological survey was insufficient to properly identify things like seasonal plant life and migratory birds.** One example of a species of special concern in California that appears in the foothills here each year is the Yellow Warbler. I’m attaching a screen shot of my Merlin ID app from August 28, 2025.

The project conditions specify Landscaping “Within the Verdugo SEA” to emphasize locally indigenous (and non-invasive) other plants, but makes no mention of emphasizing this throughout the rest of the project consistently, (not just what is technically within the SEA), which would be most appropriate. Under the Fire mitigation measure MM-35 it states: *All landscaping shall use fire-resistant plants and materials. A list of such plants is available from the Brush Clearance Unit, 6262 Van Nuys Blvd., Room 451, Van Nuys, CA 91401 (818) 994-4444.* **However, nowhere does it emphasize to also avoid the prohibited plants as listed in the San Gabriel Verdugo Mountains Scenic Preservation Specific Plan.** There is rarely adequate coordination between what is published in one department versus another. **The list provided by the Fire Department may not be entirely appropriate for the project either.** Just because a plant is considered to be “drought tolerant” doesn’t mean it will not help to destroy a relatively intact plant community. Plants are not going to respect the boundary of the S.E.A. Once invasive plants are introduced, they will take off like “wildfire”. We have already seen the increase of the invasive weed “tree of heaven” gaining more of a foothold with the ever-increasing aggressive clearance. Bare dirt favors the weeds, which tend to be the mainstay of fire fuels. Nobody is enforcing prohibited plant material regulations in the San Gabriel Verdugo Mountains Scenic Preservation Specific Plan.

Mitigation measures that replace a healthy eco-system of numerous mature trees with relatively young “specimen” trees of a particular variety placed within close proximity to human

occupation and infrastructure, are doomed to failure. A tree surrounded by concrete or other hardscape, cut off from the inter-relationships with other life that it requires to survive, subjected to constant surface clearance of every single leaf and subjected to either acute or chronic hard pruning practices, will fail. **A tree that is cut to the point where it can no longer serve the functions of oxygen exchange, water reclamation, shade, nesting, food sources for numerous birds and other animals, now is no longer a tree, it's a temporary architectural feature. Smaller replacement trees will take many decades to even come close to the service benefits of more mature trees, that is, if they make it that far.** It is far more likely that the replacement trees, even if they survive the initial "bonding" period, will be likely to die or be removed in short order by the new/subsequent home owners. The younger trees will be even easier for people to simply remove with one swipe of a chain saw vs much effort at all.

Contrary to wishful thinking, everybody still uses personal vehicles in Los Angeles. The proposed houses are relatively large with corresponding garages and relatively large lots. However, thanks to the state level ADU laws, the current trend is for people to convert garages to ADUs, or possibly add Moveable Tiny Houses, in the hopes of maximizing future financial rewards, or perhaps to house additional related parties, but in either case, this results in yards being converted to parking lots. We are quickly losing all yard space and it's going to have a significant negative impact on things like water recapture, increased runoff. **This is again, evident by merely looking around at what is happening here in the already developed areas on a daily basis. It's not reasonable for me to go around the neighborhood taking pictures of it all, it's pretty obvious.**

Unless a project is truly designed with emphasis, appreciation and retention of the natural environment throughout, as part of the essential design character, not just squeezing in replacement trees to check a box, it does not meet the test of truly mitigating the impacts. **The project does call out certain "natural areas". How will those "natural areas" be retained and maintained beyond project build out? How will the trees be protected from illegal removal for the long-run?**

Every biologist who knows southern California Flora and Fauna knows well that, in particular, the drought-tolerant species of plants in Southern California foothills such as the Verdugos, evolved and live largely based upon the inter-relationships between soil organisms such as the Mycorrhizal fungi, and the plants and trees themselves with varying root depths exchanging water and nutrients. The impact is going to reach beyond the pen-and-ink boundaries of the tract map.

The impact of the more stringent fire clearance requirements now with proximity to more buildings, has not been well considered. Two houses proposed on the Southerly most section, highest elevation, farthest away from existing houses are going to have probably the

most impact. Whereas the existing biological resources exist currently a bit “removed” from existing human habitation, having to clear 200 feet from each structure, with the ever-increasing focus on fire safety, will now have a very significant impact on that plant community and the ecosystems overall health, not to mention negatively impact slope stability. California native plants stabilize slopes by mechanically reinforcing the soil with dense, deep root networks that increase shear strength and by reducing erosion. Smaller-diameter, fibrous roots provide high tensile strength, creating a natural rebar-like mesh that prevents shallow landslides and surface washout. Once the relationships are broken, typically one will see die back of shrubs and trees surrounding the area of disturbance.

It is unknown how far up slope the impacts will reach but in particular with respect to the houses planned for the more steep slopes, up towards the SEA, the construction activities and then the ongoing use and maintenance of the properties is going to end up having significant impact to the native plants on lower extents as well, such as from routine runoff, any chemicals or pesticide and fertilizers used in the ornamental landscaping proximate to the buildings. Invasive weeds will get a foothold from grading disturbance and post-grading fire clearance activities, promoting non-native weeds and grasses which will set up the never-ending cycle of hillside clearance activities with associated disturbances, weed whackers, dirt blowers and the like. Just look around at similar projects and you will see the effects clearly. It is also not clear if the fire clearance will further impact scenic resources/ridgelines and should be evaluated in that context. It certainly will impact the overall health of the adjacent vegetation and may result in chronic problems with runoff during rain cycles, reduced water recapture.

The runoff issues during the construction/grading phase are likely to be significant as we already K-rails lined up along sections of McGroarty street for years after the La Tuna Fire of 2017 had burned just a few sections of upper slope. More importantly, just some small construction projects nearby in the hillside have caused some really significant runoff into streets and neighbors properties.

Mitigation measures are not all valid if they cannot be reasonably expected to be actually enforced, vs offering an opinion that they are “*enforceable*”. These are very, very different things.

The below is a perfect example of citing a mitigation that is not reasonably enforceable. Trust is not a method of enforcement.

MM-19. BIO-19. Prohibited Use of Anticoagulant Rodenticides.

During construction activities and upon project occupancy, the use of anticoagulant rodenticides which have the potential to significantly degrade biological resources, shall be prohibited throughout the tract. Individual property owners shall use nonpoisonous

*methods to control rodent pests, including sealing entrances to buildings, sanitizing property, removing rodent habitats, such as ivy or wood piles, setting traps, and erecting raptor poles or owl boxes. **The above prohibition shall be clearly described and distributed to home buyers through their purchase contracts.***

While theoretically prohibiting the use of these rodenticides is commendable, and may be enforceable during the construction phase based on builder compliance, **it is absolutely not enforceable after the houses are sold to new owners, and especially with any subsequent sale. Who would enforce these prohibitions in the subsequent “purchase contracts”?** (The answer is: Nobody.) While of course these animals will be at risk from others taking inappropriate actions, you simply cannot use this as an argument for mitigation. This is just false on its face. We have numerous Owls which actively hunt in this hillside area every night and active Raptor populations both resident and seasonal that hunt every day (Coopers Hawks, Sharp-Shinned Hawks, Red Shouldered Hawks, Red Tailed Hawks). The more development that occurs adjacent to and penetrates farther into the presently relatively undisturbed habitat that focuses on large expensive homes with nice views vs. retaining the semi-rural character of this area, the more these animals will be at risk of poisoning. **It’s just a fact and it cannot be mitigated, especially in this manner.**

Other impacts include but are not necessarily limited to Nighttime light glare, Air Quality, Water Quality, Noise, loss of accessible Recreational Opportunities and decreased Public Safety such as in the local surrounding hillside streets through increased traffic.

Current trends are to install abundant and sometimes excessively bright external lighting on all buildings including many motion-sensitive “security lights”. This is one of the last remaining sections of Verdugos in this community where night-time actually looks like night-time without all the high impact glare which **affects both people and wildlife.**

Among many other things, nocturnally migrating birds can be severely affected by night-time lighting. Most birds migrate at night. Birds can suffer from confusion due to artificial light at night (ALAN), sometimes to the point where they become severely disoriented, which can ultimately lead to exhaustion, increased risk of predation or fatal collisions ([Van Doren et al., 2017](#); [Korner et al., 2022](#)). Foothills are heavily utilized by migratory birds for navigation as well as utilizing the native vegetation here for nesting and sometimes just a rest and food stop along their path. In addition to the year-round resident species, some species migrate to nest specifically in the foothills and **utilize the food sources provided by the native vegetation.** Removing this many trees, native and non-native, is going to have a significant impact that cannot be mitigated in the short-term. **Without long-term survival of the trees and associated plants, it likely cannot be mitigated for the long-term. Some increased impacts could likely**

be in conflict with the California Migratory Bird Protection Act, or the Migratory Bird Treaty Act of 1918.

Certain measures may have been accepted with the mere “belief” that they will be enforced, and will persist after the completion of the project. Appellants are expected to bring “evidence”, but **objectively, there is no evidence supporting the reliance upon some of these mitigations other than *in theory***. Yet, just normal day to day observations of the events in the neighborhood support the conclusion that enforcement is extremely rare and generally ineffective. With the City now facing chronic and severe budget shortfalls, cutting the workforce in numerous departments, enforcement is now the lowest priority.

Mitigation measures must survive beyond the initial project buildout or they are no mitigation measures at all.

While the developer may even dutifully follow the prescribed mitigations during the construction phase, once these houses are sold off to third parties, it is more likely than not that mitigation measures will quickly fail.

To put forth mitigation measures as enforceable and effective in light of the contrary demonstrated facts, and admission by city departments of no enforcement, is not reasonable.

There is **insufficient funding or staffing within Urban Forestry**. Service requests for enforcement submitted to Urban Forestry have languished at times for not only months, but **years**. The **UFD personnel have openly stated that they simply do not have the resources to handle the enforcement activities, but also that the City Attorney’s office or Board of Public Works also does not want to take the effort to pursue the enforcement.** The division has no authority to take action at the time of the cutting or other damage, and struggles to connect the precedent events to the eventual death.

You may argue that would be true of the trees on the project site, whether or not the subdivision occurs. However, the issue is when human habitation/building is introduced within very close proximity to the trees. **Trees “out of the way” from direct human activities are the ones that survive. They thrive on neglect. In other words, on the larger lots, on undeveloped sections of hillsides where nobody has an incentive to remove the tree in order to expand a parking area or other activities.** Trees “in the way” of human activities do not survive.

There is no coordination between initial reports of possible fatal damage vs the ultimate removal of the eventual dead tree or shrub.

With the budget wars going on in the City, cutting LAPD hiring, it’s to think that funding priority will be to ensure that Urban Forestry or other enforcement mechanisms will be adequately funded in the foreseeable future.

Mitigation measures which state that something “**should**” happen vs something “**shall**” happen are invalid on their face. Just do a search on the PDF and you will see all the occurrences of the word “should”. In addition, mitigation measures to address a short-term impact alone, while ignoring the same or similar long-term impact, is not reasonable. **To avoid an active bird nest while ignoring the permanent removal of the habitat that permits birds to nest, is not reasonable.**

Example:

MM-14. BIO-14. Nesting Birds.

*To avoid impacts to nesting birds, project-related activities **should** occur outside of the bird breeding season (February 1 to August 31) to the extent practicable. If construction must occur during the bird breeding season, then no more than 1 week prior to initiation of ground disturbance and/or vegetation removal, a nesting bird and raptor pre-construction survey **should** be conducted by a qualified biologist in the disturbance footprint plus a 300-foot buffer (500-foot for raptors), where feasible. If the proposed project is phased, a subsequent pre-construction nesting bird and raptor survey may be required prior to each phase of construction within the project site. Pre-construction nesting bird and raptor surveys **should** be conducted during the time of day when birds are active and **should** be of sufficient duration to reliably conclude presence/absence of nesting birds and raptors onsite and within the designated vicinity. A report of the nesting bird and raptor survey results, if applicable, **should** be submitted to the lead agency for review and approval prior to ground and/or vegetation disturbance activities. If nests are found, their locations **should** be flagged. An appropriate avoidance buffer, depending upon the species and the proposed work activity, **should** be determined and demarcated by a qualified biologist with bright orange construction fencing or other suitable flagging. Active nests **should** be monitored at a minimum of once per week until it has been determined that the nest is no longer being used by either the young or adults. No ground disturbance **should** occur within this buffer until the qualified biologist confirms that the breeding/nesting is complete, and all the young have fledged. If project activities must occur within the buffer, they **should** be conducted at the discretion of the qualified biologist. If no nesting birds are observed during pre-construction surveys, no further actions would be necessary.*

Respectfully

Rhonda Herbel

**20+ CONSTITUENTS SUBMITTED THE FOLLOWING
STATEMENT TO THE CPC@LACITY.ORG INBOX FOR THE
CITY PLANNING COMMISSION'S CONSIDERATION:**

Item Nos. 09 & 10:

Opposition to Project at 8100-8160 W. McGroarty St. & 10000 N. McVine Terrace (VTT-73957-HCA-1A; DIR-2019-952-SPP-1A); 6/25/26 Meeting Agenda Items 9 & 10

Email Message:

Dear Members of the Los Angeles City Planning Commission:

I am writing to express my strong opposition to the proposed 13-lot residential subdivision project located at 8100, 8150, and 8160 West McGroarty Street and 10000 North McVine Terrace (Project). The Commission is scheduled to hear the appeals regarding this project on June 25, 2026, and **I urge you to grant the appeal, deny, the project, disapprove the project entitlements, and require a full Environmental Impact Report (EIR).**

This Project poses severe risks to our public safety and local environment that the current Mitigated Negative Declaration (MND) completely fails to address:

1. Severe Wildfire Risks and Fire Code Violations

The project site lies entirely within a designated Very High Fire Hazard Severity Zone (VHFHSZ). Neither of the only two access routes to the project complies with State Minimum Fire Safe Regulations or Los Angeles Municipal Code Section 57.4908:

- **Dangerous Roadway Widths:** On-street parking along McVine Avenue and McGroarty Street narrows the usable two-way travel lanes to 18–18.5 feet, violating the mandatory 20-foot minimum required for emergency vehicle access and civilian evacuation.
- **Excessive and Hazardous Grades:** Proposed Private Street "A" features a grade reaching up to 21.43%, which exceeds the absolute state limit of 20% and violates the Fire Department's own 15% maximum standard.
- **Inadequate Turnarounds:** Private Street "A" does not provide a code-compliant turnaround radius, and Private Street "B" completely dead-ends without any required turnaround or hammerhead.
- **Procedural Failures:** The City has failed to properly notify CAL FIRE or include these mandatory fire-safe standards as conditions of approval. Approving a dense

subdivision with non-compliant emergency access creates an unacceptable public safety hazard.

2. Inadequate Environmental Review and Threat to Wildlife

- **Unstudied Baseline:** No protocol-level biological surveys were conducted. The developer relied on a brief, two-hour walk-through that completely missed the blooming periods of local special-status plants.
- **Threats to Endangered Species:** The project site provides suitable habitat for sensitive wildlife—including the genetically unique remnant population of the coast horned lizard, the Crotch's bumble bee, and the mountain lion. The MND fails to properly analyze or mitigate impacts to these species.
- **Understated Native Tree and Shrub Losses:** The project relies on an outdated 2016 tree report, underestimating the number of protected native oaks and sycamores that will be killed by root damage. It also entirely omits impacts on protected toyon and Mexican elderberry shrubs.
- **Degradation of the Verdugo Mountains SEA:** The proposed mitigation measures for the portion of the project inside the Significant Ecological Area (SEA) are vague, deferred, and scientifically proven to be ineffective (such as using relocation tactics with a 95% mortality rate for lizards, and glass regulations that do not prevent bird strikes).

Because the required legal findings for physical suitability and public safety cannot be made on this record, I respectfully request that the Planning Commission uphold the appeal, reject the current map and entitlements, and order a comprehensive Environmental Impact Report.

Thank you.

DAY OF HEARING SUBMISSIONS



Department of City Planning

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

June 24, 2026

TO: City Planning Commission

FROM: Sarah Hounsell, Senior City Planner

TECHNICAL MODIFICATION/CORRECTION TO THE STAFF RECOMMENDATION REPORT AND EXHIBITS FOR CASE NO. CPC-2018-3723-GPA-ZC-CDO-BL-CA; THE ORANGE (G) LINE TRANSIT NEIGHBORHOOD PLAN

The following technical modifications/corrections are to be incorporated into the staff recommendation report and exhibits to be considered at the City Planning Commission meeting of June 25, 2026, related to Item No. 7 on the meeting agenda.

To be consistent with the New Zoning Code, a portion of the Van Nuys Central Business District Community Design Overlay (CDO) District within the Orange (G) Line Transit Neighborhood Plan area will be rescinded and the related Design Guidelines and Standards will reflect the updated CDO boundary and technical corrections. Similarly the NoHo Commercial and Artcraft District Overlay will be rescinded as it is entirely within the Orange (G) Line Transit Neighborhood Plan area and will be replaced with the New Zoning Code.

Revised text is shown with ~~strike-outs~~ to remove text and underline to reflect revised or new text.

Recommended Action #5 in the Staff Recommendation Report should be revised to read as:

5. For Van Nuys Central Business District Community Design Overlay (CDO) District:
 - a. **Approve** and **Recommend** that the City Council **adopt**, pursuant to City Charter Section 558 and LAMC Sections 12.04 and 12.32 (Chapter 1): The proposed ordinance to **amend** the Van Nuys Central Business District ~~(CBD)~~ Community Design Overlay (CDO) District, as the New Zoning code is being applied and adopt the updated map; and,
 - b. **Adopt** the updated Design Guidelines and Standards to reflect the proposed CDO boundary and technical corrections;

Exhibit D.1- Revise the opening language of this draft ordinance as follows, and amend the Section numbers 2-6 as 3-7 accordingly:

An ordinance amending the Los Angeles Municipal Code zoning maps related to the NoHo Commercial and Artcraft District Overlay and Van Nuys Central Business District Community Design Overlay District.

THE PEOPLE OF THE CITY OF LOS ANGELES DO ORDAIN AS FOLLOWS:

Section 1. Repeal the NoHo Commercial and Artcraft District Overlay established by Ordinance No. 170,549.

Section 2: The change of boundaries of the established Van Nuys Central Business District Community Design Overlay District under Ordinance Nos. 174,420 and 174,421. The provision of Ordinance shall apply to all lots located in whole or in part within the shaded area on the following map, identified as the Van Nuys Central Business District Community Design Overlay District Boundary Map.

Transmitted herewith, is the Staff Recommendation Report for Case CPC-2018-3723-GPA-ZC-CDO-BL-CA and the related Exhibit D.1 (Draft Community Design Overlay Boundary Change Ordinance) to be considered at the City Planning Commission meeting of June 25, 2026, related to Item No. 7 on the meeting agenda.



Item No. 8

Department of City Planning

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

June 24, 2026

TO: City Planning Commission

FROM: Sarah Hounsell, Senior City Planner

TECHNICAL MODIFICATION/CORRECTION TO THE STAFF RECOMMENDATION REPORT AND EXHIBITS FOR CASE NO. CPC-2025-5486-GPA; Mobility Plan 2035 Amendments

The following technical modifications/corrections are to be incorporated into the staff recommendation report to be considered at the City Planning Commission meeting of June 25, 2026, related to Item No. 8 on the meeting agenda. The City of Los Angeles is proposing an update to the City's Mobility Plan 2035 (Circulation Element), in the form of street reclassifications and updates to the Mobility Plan Networks (referred to as the "Mobility Plan Amendment Project").

Revised text is shown with ~~strike-outs~~ to remove text and underline to reflect revised or new text.

Add Recommended Action #5:

5. **Authorize** the Director of Planning to present the Resolution and proposed General Plan Amendments (Exhibits A and B) to the Mayor and City Council, in accordance with City Charter Section 555 and LAMC Section 11.5.6 (Chapter 1).

Transmitted herewith, is the Staff Recommendation Report for Case CPC-2025-5486-GPA to be considered at the City Planning Commission meeting of June 25, 2026, related to Item No. 8 on the meeting agenda.



Department of City Planning

City Hall, 200 N. Spring Street, Room 525, Los Angeles, CA 90012

June 24, 2026

TO: City Planning Commission

FROM: Dang Nguyen, City Planner

TECHNICAL MODIFICATION/CORRECTION TO THE STAFF RECOMMENDATION REPORT FOR CASE NO. CPC-2023-7894-GPA-ZC-CU-SPR-HCA

The following technical modifications/corrections are to be incorporated into the staff recommendation report to be considered at the City Planning Commission meeting of June 25, 2026, related to Item No. 6 on the meeting agenda.

Reason: Staff recommends including the (T) prefix for the **(T)TENTATIVE CLASSIFICATION** in the RECOMMENDED ACTIONS. The action was erroneously omitted.

Revised text is shown with ~~strike-outs~~ to remove text and underline to reflect revised or new text.

RECOMMENDED ACTIONS # 4 in the Staff Recommendation Report should be revised to read as:

4. **Recommend that the City Planning Commission APPROVE** a Zone Change, pursuant to LAMC, Section 12.32, from RA-1, R1-1, and R2-1 to (T)CM-1 for the entire site; and

Transmitted herewith, is the Staff Recommendation Report for Case CPC-2023-7894-GPA-ZC CU-SPR-HCA to be considered at the City Planning Commission meeting of June 25, 2026 related to Item No. 6 on the meeting agenda.



June 25, 2026

Re: Orange (G) Line Transit Neighborhood Plans

Dear Commissioner Lawshe and Honorable City Planning Commissioners,

I am reaching out on behalf of Council District 4 to share our thoughts for the proposed Orange Line Transit Neighborhood Plan (OLTNP).

This plan represents a long-overdue and thoughtful effort to strategically expand housing opportunities near existing and future transit in the San Fernando Valley while applying the City's new zoning code in a meaningful way. This portion of the Valley is poised to receive billions of dollars in transit and mobility investments, and aligning land use with these improvements is essential if the City is to meet its housing goals and reduce dependence on single-occupancy vehicles.

It is also important to recognize that the community plans covering the OLTNP area have not undergone comprehensive rezonings since the 1990s. This plan—alongside the Southeast and Southwest Valley Community Plans—will finally resolve outdated zoning inconsistencies, remove obsolete overlays, Q conditions, and specific plans, and introduce more tailored development standards that support a healthier, more adaptable urban environment.

This planning effort arrives at a critical moment. The G Line is undergoing upgrades to deliver faster, more reliable service. The East San Fernando Valley Light Rail will transform mobility along the Van Nuys corridor, and the future Sepulveda Transit Corridor will connect the Valley to the Westside and eventually LAX. With this level of investment, the City must respond with land-use policies that incentivize housing near transit and support walkable, mixed-use neighborhoods close to services and destinations. The OLTNP is a major step toward that vision.

Specific to this plan, the OLTNP will:

- Build upon the Citywide Housing Incentive Program (CHIP) by expanding incentives through the Local Affordable Housing Incentive Program (LAHIP), in some cases exceeding CHIP to better support affordable housing production.
- Allow community-serving uses to expand beyond commercial corridors, helping create more complete neighborhoods.
- Introduce mobility upgrades that fill gaps in the existing network and sustain long-term transit ridership and active transportation use – especially for first-last mile travel to transit and to the G Line Bikeway and the LARiverWay active transportation off-street paths, and for local trips under three miles.
- Implement the new zoning code to modernize development rules and support a safer, healthier, and better-designed public realm

Our office supports the goals and objectives of this plan. To further strengthen its implementation, we respectfully request consideration of the following modifications:

- Allow businesses within the Residential-Mixed Use 5 (RX5) zone to operate until 12:00 a.m. without a conditional use permit. As proposed, businesses in this zone would only be able to operate until 10:00 p.m. by-right. This added flexibility will support active, transit-oriented neighborhoods that are expected to see increased foot traffic and evening activity.

- Introduce Public Benefits Incentive Set 2 along Van Nuys and Sepulveda Boulevards, as well as within the boundaries of the Van Nuys Community Design Overlay. Public Benefits Incentive Set 2 provides opportunities for additional development incentives in exchange for delivering public benefits. These benefits include creating privately owned, publicly accessible open space and incorporating historic resources into new building designs. Van Nuys is a park-poor neighborhood within the City of Los Angeles, and redevelopment along major corridors with larger parcels presents meaningful opportunities to introduce new open space. In addition, the Van Nuys core contains a number of architecturally significant buildings that can contribute to the area's visual identity.
- Redesignate specific street segments to the Proposed Street Classifications and to the Proposed Network Changes lists, as outlined below:
 - Proposed Street Classifications (ADD)
 - Van Nuys Boulevard – From Oxnard Street to Burbank Boulevard
 - Amend Classification to Modified Boulevard II to match existing roadway and public right-of-way widths
 - Right-of-way width: 120-160'
 - Roadway width: 80-120'
 - Sidewalk width: 15'
 - Sepulveda Boulevard – From Sherman Way to Ventura Boulevard
 - Amend Classification to Modified Boulevard II to match existing roadway and public right-of-way widths
 - Right-of-way width: 110-120'
 - Roadway width: 80-90'
 - Sidewalk width: 15'
 - Proposed Network Changes (ADD)
 - Hatteras Street – From Sepulveda Boulevard to Hazeltine Avenue
 - ADD to Neighborhood Enhanced Network (NEN)
 - Maintain all Street Classifications
 - Hazeltine Avenue – From G Line to Burbank Boulevard
 - ADD to Bicycle Lane Network (BLN), DELETE from NEN
 - Maintain all Street Classifications
 - Burbank Boulevard – From Sepulveda Boulevard to Kester Avenue
 - ADD to Bicycle Lane Network (BLN), DELETE from NEN
 - Maintain all Street Classifications
 - Tyrone Avenue – From G Line to Magnolia Boulevard
 - ADD to Neighborhood Enhanced Network (NEN)
 - Maintain all Street Classifications
 - Noble Avenue – From Hatteras Street to Valleyheart Drive North
 - ADD to Neighborhood Enhanced Network (NEN)
 - Maintain all Street Classifications
 - Valleyheart Drive North – From Sepulveda Boulevard to Kester Avenue
 - ADD to Neighborhood Enhanced Network (NEN)
 - Maintain all Street Classifications

Thank you again for your time and consideration. We appreciate the Department's work and look forward to continuing our collaboration to deliver a more connected, equitable, and sustainable San Fernando Valley.

Sincerely,

Miles Orr, Planning and Community Development Director, Council District 4



Project at 8100-8160 W. McGroarty St. & 10000 N. McVine Terrace

Katharine Paull <Kpaull@earthlink.net>

Tue, Jun 23, 2026 at 9:04 PM

To: CPC@lacity.org

Because the project will affect native trees, including those protected by the State of California and threaten endangered species in a Very High Fire Hazard Severity Zone, I object to the planned subdivision. A full EIR is needed. Nearby residents will have difficulty navigating narrow roads which will make driving unsafe.

Please consider responses from surrounding neighbors. It is important that we preserve the rural character of our remaining landscape.

Sincerely,

Katharine Paull
12215 Park Trail, Kagel Canyon, CA 91342

Dear Members of the Los Angeles City Planning Commission:

My name is Steve Gaon, and I have been a 30 + year resident of the neighborhood where the proposed development is planned. My entire family is opposed to this proposed development which would significantly impact our neighborhoods character by allowing 47,000 cubic yards of cut, 15,000 cubic yards of fill , and 32,000 cubic yards of fill which would destroy a scenic hillside and have a negative impact on hillside views, protected trees, vegetation, and wildlife.

This is why I am writing to express my strong opposition to the proposed 13-lot residential subdivision project located at 8100, 8150, and 8160 West McGroarty Street and 10000 North McVine Terrace (Project)

The Commission is scheduled to hear the appeals regarding this project on June 25, 2026, and **I urge you to grant the appeal, deny the project, disapprove the project entitlements, and require a full Environmental Impact Report (EIR).**

I would encourage the Commission to consider the 54 objections listed in the Staff Report and consider the severe risks this project poses to our public safety and local environment that the current Mitigated Negative Declaration (MND) completely fails to address:

1. Severe Wildfire Risks and Fire Code Violations

The project site lies entirely within a designated Very High Fire Hazard Severity Zone (VHFHSZ). Neither of the only two access routes to the project complies with State Minimum Fire Safe Regulations or Los Angeles Municipal Code Section 57.4908:

- **Dangerous Roadway Widths:** On-street parking along McVine Avenue and McGroarty Street narrows the usable two-way travel lanes to 18–18.5 feet, violating the mandatory 20-foot minimum required for emergency vehicle access and civilian evacuation.
- **Excessive and Hazardous Grades:** Proposed Private Street "A" features a grade reaching up to 21.43%, which exceeds the absolute state limit of 20% and violates the Fire Department's own 15% maximum standard.
- **Inadequate Turnarounds:** Private Street "A" does not provide a code-compliant turnaround radius, and Private Street "B" completely dead-ends without any required turnaround or hammerhead.
- **Procedural Failures:** The City has failed to properly notify CAL FIRE or include these mandatory fire-safe standards as

conditions of approval. Approving a dense subdivision with non-compliant emergency access creates an unacceptable public safety hazard.

2. Inadequate Environmental Review and Threat to Wildlife

- **Unstudied Baseline:** No protocol-level biological surveys were conducted. The developer relied on a brief, two-hour walk-through that completely missed the blooming periods of local special-status plants.
- **Threats to Endangered Species:** The project site provides suitable habitat for sensitive wildlife—including the genetically unique remnant population of the coast horned lizard, the Crotch's bumble bee, and the mountain lion. The MND fails to properly analyze or mitigate impacts to these species.
- **Understated Native Tree and Shrub Losses:** The project relies on an outdated 2016 tree report, underestimating the number of protected native oaks and sycamores that will be killed by root damage. It also entirely omits impacts on protected toyon and Mexican elderberry shrubs.
- **Degradation of the Verdugo Mountains SEA:** The proposed mitigation measures for the portion of the project inside the Significant Ecological Area (SEA) are vague, deferred, and scientifically proven to be ineffective (such as using relocation tactics with a 95% mortality rate for lizards, and glass regulations that do not prevent bird strikes).

Because the required legal findings for physical suitability and public safety cannot be made on this record, I respectfully request that the Planning Commission uphold the appeal, reject the current map and entitlements, and order a comprehensive Environmental Impact Report.

Thank you.



Steve Gaon
Sunland, CA. 91040

**10+ CONSTITUENTS SUBMITTED THE FOLLOWING
STATEMENT TO THE CPC@LACITY.ORG INBOX FOR THE
CITY PLANNING COMMISSION'S CONSIDERATION:**

Item Nos. 09 & 10:

Opposition to Project at 8100-8160 W. McGroarty St. & 10000 N. McVine Terrace (VTT-73957-HCA-1A; DIR-2019-952-SPP-1A); 6/25/26 Meeting Agenda Items 9 & 10

Email Message:

Dear Members of the Los Angeles City Planning Commission:

I am writing to express my strong opposition to the proposed 13-lot residential subdivision project located at 8100, 8150, and 8160 West McGroarty Street and 10000 North McVine Terrace (Project). The Commission is scheduled to hear the appeals regarding this project on June 25, 2026, and **I urge you to grant the appeal, deny, the project, disapprove the project entitlements, and require a full Environmental Impact Report (EIR).**

This Project poses severe risks to our public safety and local environment that the current Mitigated Negative Declaration (MND) completely fails to address:

1. Severe Wildfire Risks and Fire Code Violations

The project site lies entirely within a designated Very High Fire Hazard Severity Zone (VHFHSZ). Neither of the only two access routes to the project complies with State Minimum Fire Safe Regulations or Los Angeles Municipal Code Section 57.4908:

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Thank you.