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SECONDARY SUBMISSIONS



Department of City Planning

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

July 6, 2026

TO: City Planning Commission

FROM: Pablo Estrada, City Planning Associate

TECHNICAL MODIFICATIONS TO THE STAFF RECOMMENDATION REPORT FOR CASE NO. CPC-2023-3247-DB-COA-HCA; 217 North Avenue 55

The following technical modifications are to be incorporated into the staff recommendation report to be considered by the City Planning Commission meeting of July 9, 2026, related to Item No. 5a. on the meeting agenda.

1. Add to the "Requested Entitlements" section on page A-6:

Certificate of Appropriateness

The project site is identified as a Contributing Feature within the Highland Park-Garvanza Historic Preservation Overlay Zone. It is currently improved with a one (1) story residential duplex constructed in 1907 and a rear accessory structure. The original project scope was to maintain the existing duplex and demolish the rear accessory structure for the construction of the proposed project.

The Historic Preservation Overlay Zone (HPOZ) Board Meeting was held on September 26, 2024. The HPOZ Board recommended denial due to concerns over the proposed demolition of the rear accessory structure, which was included in the original scope of work. The Board also cited concerns about the project's lack of design and material compatibility with the Contributing duplex.

On December 12, 2025, the Cultural Heritage Commission (CHC) designee recommended approval of the project as revised in accordance with the HPOZ Board's design recommendations and concerns over the proposed demolition of the rear accessory structure, pursuant to LAMC Chapter 1A Section 13B.8.5.D.5. The applicant was able to address these issues by revising the project scope to maintain the existing accessory structure and propose design and building materials to enhance compatibility with the existing Contributor and surrounding historic setting. With these revisions, the applicant was able to demonstrate compliance with the Highland Park-Garvanza HPOZ.

The proposed structure is three stories, while the Contributing structure at the front of the lot is one-and-a-half stories. Other Contributors on the block range from one to two stories; however, the overall character of this block of the HPOZ is mixed, including Non-Contributing multi-family apartment buildings both immediately adjacent to and across the street from the subject property. There is also a Contributing multi-family fourplex across the street from the subject property. In addition to being located at the rear of a Contributing structure, the street-facing façade of the proposed project will be set back by an additional nine feet at the third floor, which helps to further ensure visual continuity with the historic setting.

2. Add to the Environmental Finding section on page F-7:

ADDITIONAL MANDATORY FINDINGS

Environmental Finding. The Department of City Planning determined that the City of Los Angeles Guidelines for the implementation of the California Environmental Quality Act of 1970 and the State CEQA Guidelines designate the subject Project as Categorically Exempt under Section 15332 (Class 32, In-Fill Development Project), and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies.

The project site is a Contributing Feature within the Highland Park-Garvanza Historic Preservation Overlay Zone. As reviewed by the City's Office of Historic Resources and as conditioned in the approval through the Certificate of Appropriateness Findings, the project substantially complies with LAMC Chapter 1A, Section 13.B.5 E.2 and complies with the Highland Park-Garvanza Preservation Plan approved by the City Planning Commission for the Preservation Zone. The Office of Historic Resources has found that the project complies with the Secretary of Interior's Standards for Rehabilitation, is compatible in design with the Highland Park-Garvanza Residential Infill Guidelines and will not result in a substantial adverse change to the significance of a historical resource or district. This project would not have impacts to the character defining features of the surrounding properties, as it has been found compliant with the applicable Preservation Plan. Based on this, the project will not result in a substantial adverse change to the significance of a historic resource.

See Justification for Categorical Exemption Case No. ENV-2023-3248-CE in the case file for the narrative demonstrating that exceptions do not apply.

3. Revise "Exhibit E – Environmental" to include:

According to Envirostor, the State of California's database of Hazardous Waste Sites, neither the subject site, nor any site in the vicinity, is identified as a hazardous waste site. The project site is a Contributing Feature within the Highland Park-Garvanza Historic Preservation Overlay Zone. As reviewed by the City's Office of Historic Resources and as conditioned in the approval through the Certificate of Appropriateness Findings, the Project substantially complies with LAMC Chapter 1A, Section 13.B.5 E.2 and complies with the Highland Park-Garvanza Preservation Plan approved by the City Planning Commission for the Preservation Zone. The Office of Historic Resources has found that

the project complies with the Secretary of Interior's Standards for Rehabilitation, is compatible in design with the Highland Park-Garvanza Residential Infill Guidelines and will not result in a substantial adverse change to the significance of a historical resource or district. This project would not have impacts to the character defining features of the surrounding properties, as it has been found compliant with the applicable Preservation Plan. Based on this, the project will not result in a substantial adverse change to the significance of a historic resource.

July 6, 2026

Ms. Monique Lawshe, President
Members of the Los Angeles City Planning Commission
Los Angeles City Planning
200 North Spring Street, Room 340
Los Angeles, California 90012

RE: Item No. 6
Case No. CPC-2025-5194-HD-CU2-PR-ZC / ENV-2025-5195-MND
Request for Technical Modifications to Proposed Conditions
4802-4828 West San Vicente Boulevard, California, 90019

Dear Ms. Lawshe and Members of the Los Angeles City Planning Commission,

three6ixty represents Westport Properties Inc. (the “Applicant”) with regard to Case No. CPC-2025-5194-HD-CU2-PR-ZC / ENV-2025-5195-MND for the property located at 4802-4828 West San Vicente Boulevard, California, 90019. The case is for the demolition of an existing one-story warehouse building for the construction, use, and maintenance of a new seven-story storage facility for household goods (the “Project”).

We have reviewed the staff report for Item 6 on the July 9th City Planning Commission Agenda, and request technical modifications to three (3) conditions under the “Conditions for Effectuating (T) Tentative Classification Removal”. These conditions, as currently proposed, do not align with the scope of the Project, and/or other proposed Conditions of Approval. As such, we respectfully ask that the following conditions be modified and/or deleted as follows:

- **Condition 2.B, Bureau of Engineering.** This condition to improve the alley intersection on Longwood Ave is infeasible due to existing encroachments and improvements in the alley that would impede any access, and are utilized exclusively by adjacent property owners and tenants not related to the Applicant’s property. Specifically, the existing gate and adjacent garage would prohibit the required alley rework to bring this alley intersection to current Bureau of Engineering standards.

The Applicant has requested a waiver of all dedication and improvement conditions related to this alley as part of this application, and the grant of that waiver is reflected in the remainder of proposed the T-conditions. However, this improvement remained. As such, we request that Condition 2.B be modified as follows:

“Longwood Avenue – Remove and replace the existing curb ramp ~~and alley intersection~~; any existing broken curb, gutter, and roadway pavement. These improvements should suitably transition to join the existing improvements satisfactory to the City Engineer.”

Please see the attached Longwood Alley Improvements Infeasibility Exhibit for more details.

- **Condition 3.A, Bureau of Street Lighting.** We request that language referring to any final map be deleted in its entirety from the Conditions of Approval, as there is no map associated with this Project. As such, we request that Condition 3.A be modified as follows:

"Prior to the ~~recording of the final map or~~ issuance of the Certificate of Occupancy (C of O), street lighting improvement plans shall be submitted for review and the owner shall provide a good faith effort via a ballot process for the formation or annexation of the property within the boundary of the development into a Street Lighting Maintenance Assessment District."

- **Condition 6, Cable.** The Project as a self-storage facility does not provide any television or cable service for its employees or patrons. This condition would require a service that is not applicable to the Project. Thus, we request that Condition 6 condition be deleted in its entirety.

"~~Cable. Make any necessary arrangements with the appropriate cable television franchise holder to assure that cable television facilities will be installed in City rights-of-way in the same manner as is required of other facilities, pursuant to Municipal Code Section 17.05 N to the satisfaction of the Department of Telecommunications.~~"

On behalf of the Applicant, we appreciate your consideration of these requested technical modifications to the "Conditions for Effectuating (T) Tentative Classification Removal". Please call me at (310) 204-3500 or email me at dana@three6ixty.net if you have any questions regarding this letter.

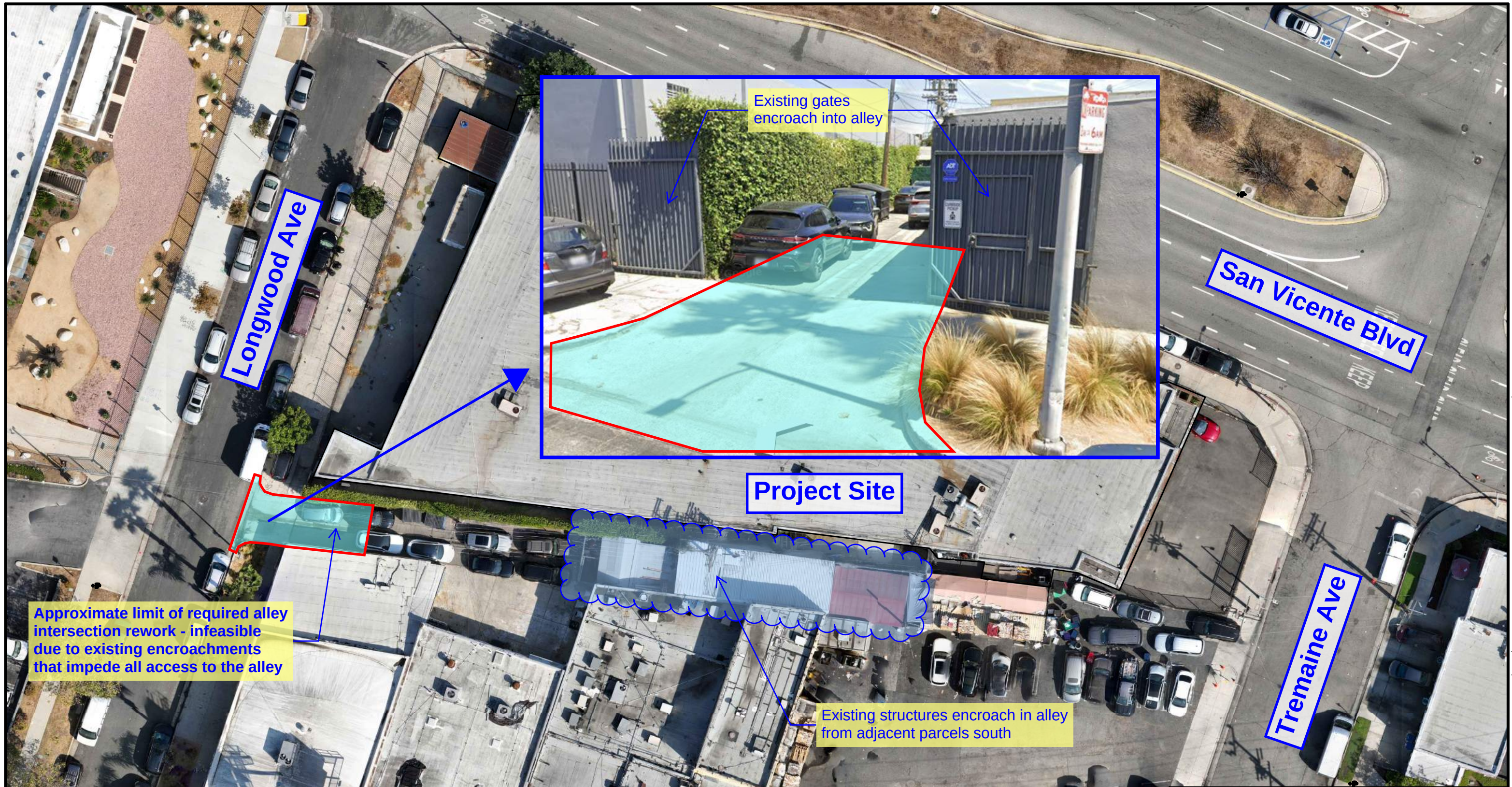
Sincerely,
three6ixty



Dana A. Sayles, AICP

Attachment: Longwood Alley Improvements Infeasibility Exhibit

CC: David Woon, Department of City Planning
David Kelly, Westport Properties, Inc.
Hakeem Parke-Davis, CD 10



SCALE: 1"=30'

WESTPORT SAN VICENTE
LONGWOOD ALLEY IMPROVEMENTS
INFEASIBILITY EXHIBIT
4802 SAN VICENTE BLVD, LOS ANGELES, CA

ORC Engineering, Inc.
Civil Engineering/Land Surveying/Land Planning

160 S. Old Springs Road
Suite 210
Anaheim Hills, CA 92808
714-685-6860

DAY OF HEARING SUBMISSIONS



Jul 8, 2026

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

**Re: Proposed Housing Development Project at 217 North Avenue 55 -
CPC-2023-3247-DB-COA-HCA**

To: cpc@lacity.org

**Cc: Pablo Estrada, City Planning Associate, pablo.estrada@lacity.org;
City Clerk's Office, clerk.cps@lacity.org; City Attorney's Office,
cityattys.help@lacity.org;**

Dear Los Angeles City Planning Commission,

The California Housing Defense Fund (CalHDF) submits this letter to remind the City of its obligation to abide by all relevant state laws when evaluating the proposed 7-unit housing development project at 217 North Avenue 55, which includes 1 low-income unit. These laws include the Housing Accountability Act (HAA), the Density Bonus Law (DBL), AB 130, and California Environmental Quality Act (CEQA) guidelines.

The HAA provides the project legal protections. It requires approval of zoning and general plan compliant housing development projects unless findings can be made regarding specific, objective, written health and safety hazards. (Gov. Code, § 65589.5, subds. (d), (j).) The HAA also bars cities from imposing conditions on the approval of such projects that would render the project infeasible (*id.* at subd. (d)) or reduce the project's density (*id.* at subd. (j)) unless, again, such written findings are made. As a development with at least two-thirds of its area devoted to residential uses, the project falls within the HAA's ambit, and it complies with local zoning code and the City's general plan. Increased density, concessions, and waivers that a project is entitled to under the DBL (Gov. Code, § 65915) do not render the project noncompliant with the zoning code or general plan, for purposes of the HAA (Gov. Code, § 65589.5, subd. (j)(3)). The HAA's protections therefore apply, and the City may not reject the project except based on health and safety standards, as outlined above. Furthermore, if the City rejects the project or impairs its feasibility, it must conduct "a

thorough analysis of the economic, social, and environmental effects of the action.” (*Id.* at subd. (b).)

CalHDF also writes to emphasize that the DBL offers the proposed development certain protections. The City must respect these protections. In addition to granting the increase in residential units allowed by the DBL, the City must not deny the project the proposed waivers and concessions with respect to front access passageway reduction, rear yard setback, and side yard setback. If the City wishes to deny requested waivers, Government Code section 65915, subdivision (e)(1) requires findings that the waivers would have a specific, adverse impact upon health or safety, and for which there is no feasible method to satisfactorily mitigate or avoid the specific adverse impact. If the City wishes to deny requested concessions, Government Code section 65915, subdivision (d)(1) requires findings that the concessions would not result in identifiable and actual cost reductions, that the concessions would have a specific, adverse impact on public health or safety, or that the concessions are contrary to state or federal law. The City, if it makes any such findings, bears the burden of proof. (Gov. Code, § 65915, subd. (d)(4).) Of note, the DBL specifically allows for a reduction in required accessory parking in addition to the allowable waivers and concessions. (*Id.* at subd. (p).) Additionally, the California Court of Appeal has ruled that when an applicant has requested one or more waivers and/or concessions pursuant to the DBL, the City “may not apply any development standard that would physically preclude construction of that project as designed, even if the building includes ‘amenities’ beyond the bare minimum of building components.” (*Bankers Hill 150 v. City of San Diego* (2022) 74 Cal.App.5th 755, 775.)

Furthermore, the project is exempt from state environmental review under the Class 32 CEQA categorical exemption (In-Fill Development Projects) pursuant to section 15332 of the CEQA Guidelines, as the project is consistent with the applicable general plan designation and all applicable general plan policies as well as the applicable zoning designation and regulations; the proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses; the project site has no value as habitat for endangered, rare, or threatened species; approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality; and the site can be adequately served by all required utilities and public services. The project is also eligible for a statutory exemption from CEQA pursuant to AB 130 (Pub. Res. Code, § 21080.66) as it does not require the demolition of a historic structure (*id.* at subd. (a)(7)). Caselaw from the California Court of Appeal affirms that local governments err, and may be sued, when they improperly refuse to grant a project a CEQA exemption or streamlined CEQA review to which it is entitled. (*Hilltop Group, Inc. v. County of San Diego* (2024) 99 Cal.App.5th 890, 911.)

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

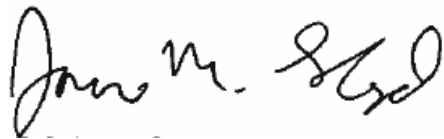
reducing competition for existing housing. It will also help cut down on transportation-related greenhouse gas emissions by providing housing in denser, more urban areas, as opposed to farther-flung regions in the state (and out of state). While no one project will solve the statewide housing crisis, the proposed development is a step in the right direction. CalHDF urges the City to approve it, consistent with its obligations under state law.

CalHDF is a 501(c)(3) non-profit corporation whose mission includes advocating for increased access to housing for Californians at all income levels, including low-income households. You may learn more about CalHDF at www.calhdf.org.

Sincerely,



Dylan Casey
CalHDF Executive Director



James M. Lloyd
CalHDF Director of Planning and Investigations

CPC-2025-5194

Re: 4802 San Vicente Blvd — Written Testimony for July 9, 2026 City Planning Commission Hearing

To the Los Angeles City Planning Commission,

We, the undersigned residents of Longwood Highlands and the surrounding Mid-City community, submit this letter in formal opposition to the proposed seven-story self-storage facility at 4802 San Vicente Blvd, in support of the 182 signed petitions previously submitted and logged with the Commission.

Many of our signers have raised a pointed question: why should decision-makers and developers based in communities like Newport Beach dictate what gets built in our neighborhood? If a seven-story storage facility is truly a beneficial addition, we invite its proponents to build one in their own community first.

We also ask the Commission to scrutinize how this project actually benefits the surrounding community today. A self-storage facility generates minimal foot traffic, minimal local employment, and no meaningful community amenity — yet the project proposes 35 bicycle parking spaces. This requirement appears tied to citywide mobility and transit planning assumptions that may not materialize in this corridor for another 20 years. Designing today's project around infrastructure for a transit future that does not yet exist ignores the neighborhood's actual, present-day needs.

The Olympic Park Neighborhood Council formally voted to oppose this project on May 4th (Agenda Item IV, New Business, Item B), as reflected in their meeting minutes, which we have attached — a vote the applicant proceeded to ignore entirely. That vote takes on added significance given a material misstatement made on the record: at the PLUM Committee meeting, the applicant's representative, Dana Sayles, stated that OPNC had approved this project. This statement was made in the presence of David Woon, Planning Assistant, and Hakeem Park-Davis, both of whom were on the call, and is directly contradicted by the attached minutes. What is clear is that a false claim was placed on the public record before this Commission, and we ask that it be corrected and weighed accordingly. Separately, and independent of any neighborhood council involvement, nearly 200 residents took the time to sign our previously submitted petition in person — a clear, direct expression of community opposition.

Our coalition did not arrive at opposition without first attempting to propose an alternative. On May 26th, we submitted a formal alternative proposal, addressed to Councilmember Hutt and sent to Hakeem Park-Davis, regarding a community center for this site, potentially funded through behested donations already flowing from developers to Councilmember Hutt's office. This proposal, along with our previously delivered petitions and repeated requests for a meeting, went unanswered for weeks. Notably, Mr. Park-Davis only reached out requesting a meeting this past week — one week before this hearing, and only after the applicant's own representative was unable to sway community opposition. We raise this timeline not as a grievance, but as evidence that the community's constructive alternative was never given genuine consideration until opposition to this project had already proven too strong to ignore.

Should this project be approved, the consequences will fall on this neighborhood, not on its proponents. The applicant has requested extensive exemptions from standard requirements, revealing a fundamental disregard for the aesthetic character of this community. A seven-story structure at this scale will set a precedent for out-of-context development along San Vicente, degrading the residential character that drew families here in the first place. It will increase truck and vehicle traffic on streets not designed for commercial-scale loading, strain already limited street parking, and remove any near-term possibility of the site being used for something the

community actually needs — such as the affirmative, community-serving vision our coalition has proposed. Once built, this decision cannot be undone. We ask the Commission to weigh that permanence carefully before voting.

We want to be clear: this Commission's decision on this matter will not go unnoticed. Our coalition, along with the nearly 200 residents who signed this petition, will be watching this vote closely and will remember it. Public accountability does not end at this hearing.

We respectfully urge the Commission to reject this proposal and to consider the alternative vision our coalition has submitted, centered on community use rather than storage.

Respectfully,
The Longwood Highlands Coalition
Barbara Calloway