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- **"Initial Submissions"**: Compliant submissions received no later than by end of day Monday of the week prior to the meeting, which are not integrated by reference or exhibit in the Staff Report, will be appended at the end of the Staff Report. The Staff Report is linked to the case number on the specific meeting agenda.

- **"Secondary Submissions"**: Submissions received after the Initial Submission deadline up to 48-hours prior to the Commission meeting are contained in this file and bookmarked by the case number.

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

SECONDARY SUBMISSIONS

DAY OF HEARING SUBMISSIONS

Memorandum; Request for Administrative Review of Entitlement Conditions – Case No. CPC-2019-6069-CU-DB-CDP-CDO-SPP-MEL-WDI; 2471 Lincoln Blvd.; Safe Place for Youth

r cdila1 <cdila1@yahoo.com> Mon, Jul 20, 2026 at 1:06 PM
To: "cpc@lacity.org" <cpc@lacity.org>, "vince.beroni@lacity.org" <vince.beroni@lacity.org>, "traci.park@lacity.org" <traci.park@lacity.org>
Cc: "star.parsamyan@lacity.org" <star.parsamyan@lacity.org>, "craig.bullock@lacity.org" <craig.bullock@lacity.org>, "kevin.keller@lacity.org" <kevin.keller@lacity.org>, "34270@lapd.online" <34270@lapd.online>, "rosemarie.aceituno@lacity.org" <rosemarie.aceituno@lacity.org>

Memorandum

To: City of Los Angeles Planning Commission; Director of Planning Vince Bertoni; Los Angeles City Council Member Traci Park; Deputy Mayor Rachel Freeman

From: Robert Cherno]

Date: July 20, 2026

Re: Request for Administrative Review of Entitlement Conditions – Case No. CPC-2019-6069-CU-DB-CDP-CDO-SPP-MEL-WDI; 2471 Lincoln Blvd.; Safe Place for Youth

I. Purpose

This memorandum requests administrative review of the operational conditions governing the project approved under Case No. CPC-2019-6069-CU-DB-CDP-CDO-SPP-MEL-WDI. The request is based on the absence of operational safeguards within the entitlement and documented concerns regarding neighborhood impacts following occupancy.

This memorandum does not assert that the Planning Commission violated the Los Angeles Municipal Code by approving the project. Rather, it contends that the approved entitlement contains no operational conditions addressing public safety, neighborhood compatibility, or accountability despite the project's ongoing operation and its potential effects on adjacent residential properties.

II. Background

The Planning Commission approved a mixed-use development consisting primarily of affordable housing together with office space.

The entitlement includes conditions relating to:

- affordable housing requirements;
- density bonus incentives;

- parking;
- building height and setbacks;
- landscaping;
- lighting;
- sustainability measures;
- bicycle parking;
- open space;
- trash collection; and
- graffiti removal.

The conditions primarily regulate physical development and long-term maintenance of the property.

III. Operational Conditions Not Included

The entitlement does not include conditions addressing operational management of the facility after occupancy, including:

- Security staffing or security patrols.
- Written security or emergency response plans.
- Operations and management plans.
- Good Neighbor Policies.
- Neighborhood liaison requirements.
- Community advisory meetings.
- Complaint investigation procedures.
- Incident documentation and reporting.
- Resident behavioral expectations.
- Visitor management procedures.
- Loitering prevention measures.
- Coordination protocols with the Los Angeles Police Department.
- Performance reporting to the City.
- Periodic operational review by City departments.
- Corrective action procedures if neighborhood impacts occur.
- Administrative review triggered by recurring public safety issues.

IV. Comparison With Common Conditional Use Practice

For land uses that have the potential to affect surrounding neighborhoods, the City frequently considers operational conditions tailored to the specific use. Depending on the nature of the project, these may include security plans, management plans, neighborhood liaison requirements, limits on certain activities, complaint-response procedures, and periodic reporting or review.

Whether such conditions are appropriate depends on the evidence before the decision-maker and the applicable provisions of the Los Angeles Municipal Code. Their absence in a particular entitlement is not, by itself, proof of error. However, when substantial operational impacts, as in this case, are later alleged or documented, the absence of these tools may limit the City's ability to address concerns through permit compliance.

V. Effect of the Existing Conditions

The existing conditions provide detailed standards governing construction and physical site development but provide little direction regarding day-to-day operations after the project becomes occupied.

Consequently, when neighborhood concerns arose, enforcement agencies have limited entitlement-specific conditions against which operational performance can be measured.

VI. Public Interest Considerations

The City's planning authority includes protecting the public health, safety, and general welfare while promoting compatible land uses.

If operational issues materially affect surrounding residents, businesses, or public spaces, it is appropriate for the City to evaluate whether additional operational safeguards should be considered through whatever administrative or legislative mechanisms are available under applicable law.

VII. Suggested Operational Safeguards for Consideration

Without prejudging the appropriate outcome, the City may wish to evaluate whether measures such as the following would improve neighborhood compatibility:

- A written Operations Management Plan.
- A written Security Plan.
- Designation of a 24-hour management contact.
- A neighborhood liaison responsible for responding to complaints.
- Regular meetings with nearby residents and businesses.
- Written complaint-response procedures.
- Documentation of significant incidents affecting neighboring properties.
- Coordination procedures with LAPD and other appropriate agencies.

- Exterior monitoring of the property and adjacent sidewalks consistent with applicable law.
- Periodic review of operational performance by the appropriate City departments.
- Administrative procedures allowing modification of operational requirements if warranted by documented conditions.

VIII. Requested Action

The undersigned respectfully requests that the appropriate City officials:

1. Review the operational impacts associated with the project.
2. Evaluate whether existing entitlement conditions adequately protect the surrounding neighborhood.
3. Determine whether additional operational safeguards are authorized and appropriate.
4. Review any available records maintained by City departments concerning complaints, inspections, monitoring, enforcement actions, or other information relevant to the operation of the facility.
5. Take any action authorized by law that the City determines is necessary to protect the public health, safety, and welfare while preserving the intended public benefits of the project.

IX. Conclusion

The concerns raised in this memorandum are directed to the adequacy of the project's operational framework rather than its architectural design or affordable housing objectives. The requested review seeks to ensure that the project functions in a manner compatible with the surrounding community and that appropriate operational safeguards are available should documented neighborhood impacts warrant further administrative action.

- **Appendix A:** Venice Community Housing residents demand accountability over crime | Fox News
- **Appendix B:** **Venice Shorts: Residents Confront Officials Over Ongoing Crisis at Lincoln Blvd. Housing Site - Yo! Venice!**
- **Appendix C:** June 3, 2020 Letter of Determination: **DEPARTMENT OF CITY PLANNING**

Jul 22, 2026

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

Re: Proposed Housing Development Project at 2800-2814 West Jefferson Blvd; 3411 South 8th Avenue - CPC-2024-3112-DB-VHCA

To: cpc@lacity.org

Cc: Isaiah Ross, City Planning Associate, isaiah.ross@lacity.org; City Clerk's Office, clerk.cps@lacity.org; City Attorney's Office, cityatty.help@lacity.org;

Dear Los Angeles Planning Commission,

The California Housing Defense Fund (CalHDF) submits this letter to remind the City of its obligation to abide by all relevant state laws when evaluating the proposed 70-unit housing development project at 2800-2814 West Jefferson Blvd, which includes 9 very low-income units. These laws include the Housing Accountability Act (HAA), the Density Bonus Law (DBL), AB 130, and California Environmental Quality Act (CEQA) guidelines.

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

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

Furthermore, the project is exempt from state environmental review pursuant to section 15168(c) of the CEQA Guidelines. The project is also eligible for a statutory exemption from CEQA pursuant to AB 130. (Pub. Res. Code, § 21080.66.) 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.)

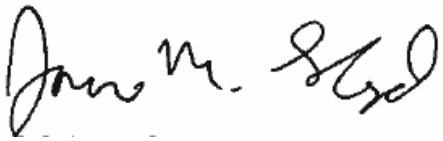
As you are well aware, California remains in the throes of a statewide crisis-level housing shortage. New housing such as this is a public benefit: by providing affordable housing, it will mitigate the state's homelessness crisis; it will increase the city's tax base; it will bring new customers to local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

Jul 22, 2026

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

Re: Proposed Housing Development Project at 8465 – 8479 North Glenoaks Boulevard; 8400 and 8424 North Wheatland Avenue - CPC-2020-1685-DB-SPR-VHCA

To: cpc@lacity.org

Cc: Joshua Ordonez, Planning Assistant, joshua.ordonez@lacity.org; City Clerk's Office, clerk.cps@lacity.org; City Attorney's Office, cityatty.help@lacity.org;

Dear Los Angeles Planning Commission,

The California Housing Defense Fund (CalHDF) submits this letter to remind the City of its obligation to abide by all relevant state laws when evaluating the proposed 93-unit housing development project at 8465-8479 North Glen Oaks, which includes 7 very low-income and 12 low-income units. These laws include the Housing Accountability Act (HAA), the Density Bonus Law (DBL), AB 130, and California Environmental Quality Act (CEQA) guidelines.

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

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

CalHDF also writes to emphasize that the DBL offers the proposed development certain protections. The City must respect these protections. In addition to granting the increase in residential units allowed by the DBL, the City must not deny the project the proposed waivers and concessions with respect to floor area ratio (FAR), height requirements, side yard setbacks, side yard plane breaks, and building height . 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 eligible for a statutory exemption from CEQA pursuant to AB 130. (Pub. Res. Code, § 21080.66.) 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.)

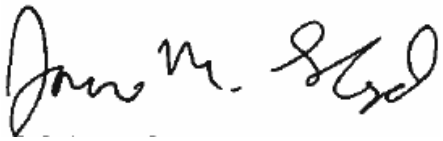
As you are well aware, California remains in the throes of a statewide crisis-level housing shortage. New housing such as this is a public benefit: by providing affordable housing, it will mitigate the state's homelessness crisis; it will increase the city's tax base; it will bring new customers to local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

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