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September 3, 2026

VIA CERTIFIED MAIL AND ELECTRONIC DELIVERY

Central Los Angeles Area Planning Commission
City of Los Angeles
200 North Spring Street, Room 532
Los Angeles, California 90012

Re: Demand Pursuant to the Religious Land Use and Institutionalized Persons Act (RLUIPA), 42 U.S.C. § 2000cc et seq. — Appeal of Conditional Use Permit, Case No. ZA-2024-6488-CU2; 200/202 South Orange Drive, Los Angeles, CA 90036

Dear Members of the Central Los Angeles Area Planning Commission,:

I. INTRODUCTION AND PURPOSE OF THIS LETTER

This firm represents Beis Medrash of Hancock Park ("BMHP"), an Orthodox Jewish synagogue and religious assembly, in connection with the Conditional Use Permit bearing Case No. ZA-2024-6488-CU2 (the "CUP") for the property located at 200/202 South Orange Drive (also known as 5566 West 2nd Street), Los Angeles, California 90036 (the "Subject Property"). We write to notify the Central Los Angeles Area Planning Commission ("APC" or "Commission" that its August 25, 2026 decision to grant the appeal filed against the CUP, and to substantially modify the Conditions of Approval, violates both California land use and zoning law and the Religious Land Use and Institutionalized Persons Act of 2000 ("RLUIPA"), 42 U.S.C. § 2000cc *et seq.*

As you are aware, Councilwoman Katy Yaroslavsky (CD5) filed an appeal position letter on August 25, 2026, seeking to "grant the appeals in part to substantially modify the Conditions of Approval."¹ The letter was filed at 4:02 p.m. on August 25, 2026, just 28 minutes before the scheduled hearing, while the Council office liaison who had been working with BMHP for years on this matter was out of the office. Although the Council office had long supported the project and had assured BMHP that it would support legalization of the existing operations without imposing occupancy caps, the Council office's belated position letter reversed course. The position letter sought, among other things, to: (1) reduce maximum occupancy of the main building from 147 persons to 75 persons—a reduction of nearly 50%; (2) reduce the accessory building occupancy from 59 to 30; (3) reduce permitted symposiums from 12 per year to 4 per year with a maximum of 50 attendees; (4) shorten the Plan Approval period from 18–24 months to 14 months with

¹Councilwoman Yaroslavsky's appeal position was provided to BMHP less than 30 minutes before the August 25, 2026 hearing.

automatic expiration; (5) impose occupancy monitoring requirements using clickers and log books; (6) add vibration retrofit requirements; (7) mandate quarterly “Good Neighbor Convenings”; and (8) restrict all activities to “entirely within a fully enclosed building” except religious exercises.

This last-minute process was prejudicial to BMHP, which lacked reasonable notice and a meaningful opportunity to be heard, and constitutes a violation of basic due process principles applicable to quasi-judicial land use proceedings under California law. It was also the apparent product of the Councilwoman's office meeting with the appellants, but not the applicant, to attempt to influence the hearing. And as with the appellants' objections, the position letter contained no rationale supporting these additional, onerous restrictions on BMHP's worship activities.

Compounding these procedural deficiencies, the deputy city attorney present at the hearing was unable to provide the Commission with meaningful guidance on RLUIPA. When Commissioner Sachdeva asked what conditions would violate RLUIPA and expose the City to federal litigation, the deputy city attorney responded that there was no “hard and fast number,” that any answer would be “very fact intensive,” and that “it really would be up to a court to decide.” He stated: “I couldn’t tell you that a cap of X amount of people occupancy—that’s definitely [a] substantial burden or that’s definitely not. It’s hard to say.” He concluded that RLUIPA is “not often the clearest area of law” and left it at that. Commissioner Sachdeva himself expressed a wish for “an expert on this ... [an] independent party who could guide us.” The Commission could have deferred the hearing to obtain such advice, but it instead opted to impose sweeping restrictions on the Congregation’s religious exercise without the benefit of clear legal advice regarding the federal statute directly governing its authority to do so.

While the APC did not adopt all of the Councilwoman's requested modifications or conditions, it did adopt the majority of them. These modifications, individually and collectively, are arbitrary and capricious, and impose a substantial burden on the Congregation’s religious exercise without any demonstration of a compelling governmental interest furthered by the least restrictive means. Indeed, the hearing transcript confirms that the APC’s August 25 determination to reduce the occupancy from 147 persons to just 75 persons was made without any diligence to support such a determination. For instance, while the Zoning Administrator explained that the occupancy was “defer[red] completely to fire department and building and safety to do the exact calculations,” the commissioners acknowledged they were second-guessing such determinations based on nothing more than their personal speculations. Commissioner Stromberg stated: “I have trouble envisioning 110 plus people in there, and why it's critical for us to really understand, contemplate the capacities, because so many of the concerns shared by the residents noise, spillover, safety, parking, really the common denominator here that comes down to is capacity.” Meanwhile Commissioner Welliver stated: “because we don't really have, as we heard earlier, the justification for how the 147 was arrived at to begin with. We can only be so specific here.” Despite having no evidence to support a lower occupancy, the APC disregarded the Zoning Administrator's determination, which deferred to the City's own Municipal Code, as well as analysis and inspections by the Fire and Building and Safety Departments.

Under California law, conditions of approval on a conditional use permit must bear a reasonable nexus to the impacts of the proposed use and must be supported by findings in the record. (Cal. Gov. Code § 65906; *Ehrlich v. City of Culver City*, 12 Cal.4th 854 (1996).) The APC imposed a 50% reduction in occupancy without any traffic study, noise analysis, fire safety assessment, or other objective evidence. The Commissioners’ own statements confirm that the 75-person cap was a political compromise adopted wholesale from Councilwoman Yaroslavsky’s position letter, not an evidence-based determination. Commissioner Sachdeva acknowledged that the number “feels ... arbitrary,” while the Zoning Administrator herself warned the Commission to “think about what objective rationale that ties to so that it doesn’t, that it’s not arbitrary unless the applicant will just agree to it voluntarily.” The Commission ignored this warning. This violates the fundamental principle that CUP conditions must be supported by substantial evidence and cannot be imposed arbitrarily.

Moreover, the appeal decision treats BMHP on less than equal terms with nonreligious assemblies and institutions within the City's jurisdiction. The City's conduct directly parallels the conduct that resulted in: (1) a permanent injunction against the City and a settlement paid by the City in the amount of \$950,000 in *Congregation Etz Chaim v. City of Los Angeles*, Case No. CV10-1587 CAS (C.D. Cal.), and (2) the conduct that resulted in a substantial settlement, permit issuance, and payment of damages and attorneys' fees in the amount of \$500,000 in *West Valley Christian Center v. City of Los Angeles*, Case No. 2:17-cv-02275 (C.D. Cal.).

This letter constitutes a formal demand that the City rescind the appeal decision, reinstate the April 9, 2026 CUP approval as issued by the Zoning Administrator, subject to modifications requested by BMHP as stated in the BMHP Position. Accordingly, in accordance with the Commission Rules and Operating Procedures, the APC should reconsider and alter their action.

I. THE APPEAL DECISION VIOLATES RLUIPA

A. The Appeal Decision Imposes a Substantial Burden on Religious Exercise

In addition to violating the most basic requirements of California law, the decision also violates RLUIPA. The modifications sought by the appeal, suggested by Councilwoman Yaroslavsky and granted by the APC, impose a substantial burden on the Congregation's religious exercise. BMHP is an Orthodox Jewish congregation whose members are religiously obligated to pray communally—a *minyan* (prayer quorum) requires the physical presence of congregants. The Subject Property is centrally located within walking distance of the Congregation's members, who are prohibited by Jewish law from driving on the Sabbath and holidays. The CUP as approved on April 9, 2026, reflected the Zoning Administrator's careful balancing of the Congregation's religious needs with neighborhood concerns, resulting in 40 conditions that the Zoning Administrator expressly found to be RLUIPA-compliant.

The appeal decision undoes that balance and imposes at least the following substantial burdens:

- 1. Occupancy Reduction from 147 to 75 (Nearly 50%).** The reduction in maximum occupancy from 147 to 75 persons in the main building effectively halves the Congregation's ability to worship together. For an Orthodox Jewish congregation, communal worship is not optional—it is a religious obligation. The practical effect of this restriction is to exclude a substantial portion of the Congregation's members from Sabbath and holiday services, fragmenting the religious community and imposing precisely the type of "significantly great restriction or onus upon religious exercise" that the Ninth Circuit has held constitutes a substantial burden. *Guru Nanak*, 456 F.3d at 988. This is particularly egregious where the Zoning Administrator, the City's own expert decision-maker, already determined that 147 persons (or however reduced pursuant to Fire and Building and Safety inspections) was an appropriate occupancy limit consistent with building safety and neighborhood compatibility. And the record contains no independent analysis or other evidence supporting a lower occupancy, meaning that the APC cannot demonstrate either a compelling governmental interest or that the occupancy limitation is the least restrictive means to achieve it.
- 2. Childcare Reduction from 59 to 30.** The reduction of the accessory building occupancy from 59 to 30 restricts the Congregation's ability to provide childcare during religious services, a function essential to enabling parents to fulfill their religious obligations. For Orthodox Jewish families, participation in Sabbath services is a religious duty; childcare for young children during services is an integral part of that religious exercise. The reduction was not based on any independent analysis of impacts from the accessory building; instead, it was derived mechanically as a proportional reduction corresponding to the main-building cap.

Commissioner Welliver stated that it “makes sense that we would correspondingly reduce the allowed occupancy of the child care facility by roughly the same percentage.” This fails the requirement that each condition be independently justified by evidence and, moreover, that it be the least restrictive means of achieving a compelling governmental interest.

3. **Mandatory On-Call Contact During Shabbat and Holy Days.** The APC modified Condition 28 to require someone to be “on call and reachable by phone” during *all* services, *including Shabbat and holy days*. The Zoning Administrator had specifically crafted Condition 28 to accommodate Orthodox Jewish religious practice: community questions, complaints, and concerns were to receive a response within 24 hours “unless such requirement would fall on a day or time when such response violates religious practice.” The APC stripped that accommodation at the hearing and instead required real-time phone and text responsiveness during sacred times when Orthodox Jewish religious practice prohibits the use of electronic devices. During the hearing, Commissioner Sachdeva raised concerns about whether this requirement would violate religious practices, stating, “I just want to make sure that we are respecting religious practice” and “I just want to make sure that the commission is aware of this fact and is respectful of that, and that we do not violate those practices and force an applicant to be in violation of their religious practices.” Despite this concern being raised by one of its own members, the APC imposed the requirement. The Commission’s willingness to override its own member’s religious-liberty concerns underscores the deliberateness of this burden. This is a direct and deliberate burden on religious exercise. It is not a neutral, generally applicable requirement; it is a condition specifically crafted to override a religious accommodation. No secular assembly use in the City is subject to a condition requiring a real-time on-call contact person during its operating hours. This independently violates both the Substantial Burden and Equal Terms provisions of RLUIPA.
4. **Restrictions on Outdoor Religious and Communal Activities.** The APC imposed significant restrictions on outdoor use, including limiting backyard gatherings and outdoor activities beyond those specifically required by religious law (namely, Sukkot). These restrictions on outdoor gathering, including post-service socializing in the backyard, burden the Congregation’s communal religious life by confining all non-Sukkot activity to the interior of a converted residential duplex. No comparable restrictions on outdoor gathering are imposed on secular assemblies. These restrictions demonstrate that the APC selectively recognized the religious character of only the most narrowly defined religious practices while treating the broader communal aspects of the Congregation’s religious life as merely secular activity subject to restriction. Once again, the APC has failed to demonstrate a compelling governmental interest and that this is the least restrictive means to achieve it.
5. **Mandatory Vibration Retrofit.** The APC adopted CD5’s recommendation requiring BMHP to submit architectural plans demonstrating that the assembly room floor will be retrofitted with a “floating acoustic subfloor” and “heavy acoustic underlayment,” to be maintained for the life of the grant. This condition has no basis in any code requirement, has no parallel in conditions imposed on any other assembly use in the City, and was adopted without any acoustic or structural engineering analysis. It imposes a significant, open-ended construction cost with no demonstrated nexus to an identified impact. To our knowledge, no community center, school, or secular assembly in a residential zone has ever been required to install such retrofitting as a CUP condition. The condition is both arbitrary under local zoning standards and evidence of disparate treatment under RLUIPA’s Equal Terms provision. And once again, it is untethered to any compelling governmental interest or showing that this very costly requirement is the least restrictive means to accomplish any such purported interest.

6. **Reduction of Symposiums.** The APC reduced permitted symposiums from 12 per year to six (the Councilwoman's position letter had sought four), with no more than two per calendar quarter and attendance capped at 75. This reduction restricts the Congregation's ability to conduct religious education and community programming central to its mission. The reduction was not supported by evidence that symposiums caused a distinct impact that could not be addressed through the existing conditions, lawful noise limits, and targeted traffic and parking measures. The APC instead treated symposium frequency as a bargaining concession in a generalized compromise, further demonstrating that the restriction is not narrowly tailored to a demonstrated governmental interest. The limitation also treats BMHP differently than other similarly situated assemblies who do not have their gatherings micromanaged by a governmental body.
7. **Mandatory Quarterly Convenings.** The APC also imposed mandatory quarterly "Good Neighbor Convenings" requiring BMHP to convene representatives of the Greater Wilshire Neighborhood Council, the Citrus Square Neighborhood Association, and Council District 5, maintain written records, and submit them with the Plan Approval application. These recurring meetings impose an ongoing administrative burden on the Congregation and require it to justify its continued religious exercise to neighboring residents, with no comparable requirement imposed on secular assemblies. The condition is not tied to a demonstrated impact or a defined, time-limited remediation plan and independently contributes to the substantial burden and unequal treatment prohibited by RLUIPA.

The cumulative effect of these modifications is to render the Congregation's approved use of the Subject Property functionally untenable and to create conditions under which the Congregation cannot meaningfully exercise its religious practices. This is a textbook substantial burden under RLUIPA.

To address the neighbors' stated concerns, BMHP proposed nuanced occupancy limits of 50 for weekday services, 110 for Shabbat, holy days and symposia, and the fire-code maximum for the High Holy Days, reflecting actual operational needs while offering in good faith to minimize possible neighborhood impacts. The APC rejected this reasoned, tiered approach and instead imposed a blanket cap of 75 for all occasions—a number lower than BMHP's proposed Shabbat cap and one that bears no relationship to the different levels of attendance and impact associated with different types of services. This one-size-fits-all approach is neither evidence-based nor the least restrictive means of addressing any legitimate concern.

B. The City Has Not Demonstrated a Compelling Interest Served by the Least Restrictive Means

Because the condition modifications and new conditions manifestly impose substantial burdens on BHMP's religious exercise, the City bears the burden of demonstrating that each of them furthers a compelling governmental interest and constitutes the least restrictive means of doing so. 42 U.S.C. § 2000cc-2(b). The City cannot meet this burden.

CD5's appeal position letter invokes "neighborhood compatibility" and "operational history" as justifications. These are precisely the types of "generalized and speculative concerns" that Judge Snyder rejected in *Congregation Etz Chaim*: "[W]hile the City may have a compelling interest in protecting health and safety, generalized and speculative concerns about traffic and parking are not compelling. No court has ever held that traffic or parking concerns where there is no evidence of any threat to public health or safety are compelling interests for purposes of RLUIPA." Order at 14.

The hearing record confirms that the APC's purported justification was subjective rather than evidentiary. When asked to identify the basis for a 75-person limit, Commissioner Sachdeva said the cap came from the

building's "square footage" and was "more or less ... reasonable." Commissioner Stromberg likewise stated: "I think 75 is a good amount that the council office is recommending, and they are recommending it based upon extensive conversations with all interested parties, since they've already done their due diligence. And my familiarity with this neighborhood." These statements do not identify a traffic study, noise analysis, fire-safety assessment, occupancy calculation, or other objective evidence connecting 75 persons to a demonstrated impact. A subjective belief that a number "seems reasonable," reliance on building square footage without analysis, and deference to a political recommendation are not a compelling governmental interest, much less the least restrictive means of furthering one under RLUIPA. Particularly where it is apparent that the "interested parties" who were consulted in the formulation of the number were only the objectors, not the applicant.

Here, the Zoning Administrator already imposed 40 conditions specifically tailored to address traffic, parking, noise, and neighborhood compatibility. The appeal offers no evidence—no traffic study, no noise analysis, no safety assessment—demonstrating that the Zoning Administrator's conditions are insufficient. Instead, the appeal relies on speculation and the conclusory assertion that further restrictions seem "reasonable" and are needed for "neighborhood compatibility." This is legally insufficient under RLUIPA.

The sweeping conditions imposed by APC are also not the "least restrictive means" of addressing any compelling governmental interest. Reducing occupancy by nearly 50% is not a targeted response to a demonstrated problem; it is a blunt instrument that effectively eviscerates the CUP while purporting to leave it in place. As the United States argued in *Etz Chaim*, "the City could have suggested measures to mitigate [its] concerns and effects on land use. The City's zoning bodies have the authority directly to regulate traffic, parking, and property aesthetics—and to do so in a way that does not discriminate against religious entities." U.S. Statement of Interest at 8. The failure to approve the least restrictive alternatives, which were enumerated in the Zoning Administrator's approval, such as targeted operational conditions, traffic management plans, and compliance with the noise ordinance and the City's objective safety standards regarding occupancy, while instead halving the Congregation's capacity, demonstrates that the appeal is not narrowly tailored.

The City's attempt to use generalized noise concerns as a basis for reducing occupancy is legally insufficient and analytically unsound. The City has a comprehensive Noise Ordinance (LAMC Chapter XI) that establishes objective, measurable standards for permissible noise levels. Compliance with the Noise Ordinance, which the Zoning Administrator already required through Conditions 9–12, is the appropriate and least restrictive mechanism for addressing noise. The City cannot circumvent its own objective noise standards by instead reducing occupancy as a proxy for noise control. Moreover, the APC pointed to no noise study, decibel measurements, or other objective evidence demonstrating that the noise generated by 147 persons (or 110, as BMHP proposed) would exceed the levels already addressed by the Noise Ordinance and the sound-insulation upgrades already installed. Reducing the number of worshippers is not a noise-mitigation measure—it is a restriction on religious exercise dressed up as one. As far as we are aware, no secular assembly in the City has had its occupancy reduced below fire-code limits on the theory that fewer people will generate less noise.

C. The Appeal Violates the Equal Terms Provision

The appeal decision also violates RLUIPA's Equal Terms provision, 42 U.S.C. § 2000cc(b)(1), because it treats BMHP on less than equal terms with nonreligious assemblies and institutions within the City.

The City does not impose post-approval occupancy monitoring (clickers and log books), mandatory quarterly community meetings, acoustic retrofitting, or comparable capacity reductions on secular assembly uses. Schools, community centers, fraternal organizations, event spaces, and other secular assemblies operating in residential and commercial zones throughout Los Angeles are not subjected to these

extraordinary post-approval conditions. The appeal singles out BMHP, a religious assembly, for heightened scrutiny and onerous conditions that have no parallel in the treatment of nonreligious assemblies.

As the Department of Justice stated in *Etz Chaim*: "The fact that several nonresidential uses are permitted in the R1 zone of Hancock Park contradicts the City's interest in preserving the community's residential character." U.S. Statement of Interest at 8. Congress enacted RLUIPA because "[z]oning codes frequently exclude churches in places where they permit theaters, meeting halls, and other places where large groups of people assemble for secular purposes." 146 Cong. Rec. S7774 (daily ed. July 27, 2000) (Joint Statement of Sens. Hatch and Kennedy). The APC decision continues this pattern of disparate treatment against religious congregations.

Notably, the Subject Property is in an R2-1 zone, where multifamily residential and various nonreligious uses are permitted, and houses of worship are explicitly permitted with a CUP. The imposition of uniquely burdensome conditions on the Congregation's use—over and above the 40 conditions the Zoning Administrator already imposed—while comparable secular uses face no such restrictions, violates the Equal Terms provision as a matter of law.

II. THE APPEAL DECISION VIOLATES CALIFORNIA LAND USE LAW

Independent of RLUIPA, the manner in which the APC reached its decision—based on the last-minute recommendation of the Councilwoman reached without even advising BMHP in any reasonable time and approved knowing the conditions lacked technical justification, particularly as to disregarding professional staff's assessment of safe occupancy—violates basic principles of California land use law. In springing new conditions on BMHP with limited time for BMHP to respond, the APC violated APC's due process rights. And the conditions themselves bear no rational nexus or rough proportionality to any purported impacts of the proposed religious facility. Nor do they observe the essential requirements of any technical standards that govern review of a CUP or have any basis in any substantial competent evidence presented during the quasi-judicial hearing. The APC members themselves recognized that they were simply pulling numbers out of the air, yet they imposed them anyway. That is the essence of an illegal decision. For those reasons alone, the APC's decision must be reconsidered or vetoed.

A. The 75-Person Occupancy Cap Is Arbitrary and Unsupported by Substantial Evidence

The APC's modifications are arbitrary and capricious under California zoning law. Conditions imposed on a conditional use permit must be supported by substantial evidence, bear a reasonable nexus to the impacts of the proposed use, and be supported by findings in the administrative record. (Cal. Gov. Code § 65906; *Ehrlich v. City of Culver City*, 12 Cal.4th 854 (1996).) The 75-person occupancy cap, the vibration retrofit, and the other new conditions lack any evidentiary basis tying them to a demonstrated impact. The record contains no traffic study, noise analysis, fire-safety assessment, acoustic or structural engineering analysis, or other objective evidence that supports these restrictions. The hearing transcript confirms the arbitrary nature of the cap. Commissioner Sachdeva stated that "75 ... also feels to me a arbitrary number," yet voted for it. Commissioner Stromberg acknowledged that the occupancy determination was "really purview of the fire department building safety" and admitted, "absent an inspection, you know, I can't make the final determination." She nevertheless proceeded to impose the 75-person cap based on his inability, after a brief evening visit to the building's exterior, to "imagine 110 people" in the building. The Zoning Administrator expressly cautioned the Commission to identify an "objective rationale" for any number "so that it doesn't, that it's not arbitrary." These admissions from the Commission's own members and the City's own zoning expert constitute powerful evidence that the 75-person cap is arbitrary and capricious. The APC therefore acted arbitrarily and capriciously in replacing the Zoning Administrator's evidence-based framework with unsupported restrictions.

B. The APC Adopted a Political Directive in Place of an Evidence-Based Zoning Determination

The 75-person figure originated entirely with Councilwoman Yaroslavsky's office, which urged the Commission to adopt that cap, and the APC adopted it without conducting an independent analysis. The CD5 representative stated on the record that the "Councilwoman does not see any time or for any reason that it would be appropriate to have 100 people in a duplex on the first level for any purpose" and that "on 75, she thinks that it's already very generous." He confirmed that the Councilwoman was "100% sure" and "very firm" on this number. This is not a zoning analysis—it is a political directive, and one that was reached in consultation only with the objectors. The Commission's adoption of a number driven by a council member's personal conviction, rather than by objective evidence, expert analysis, or fire-safety review, violates California law. And this political directive displaced the Zoning Administrator's expert determination after a four-hour-plus hearing and review of 301 submissions, and disregarded the Fire Department and Department of Building and Safety as the City's designated experts for occupancy. The hearing record confirms the APC's lack of evidence-based decision-making: the Zoning Administrator testified that she had deferred to those departments for the exact calculations, while the commissioners relied on square footage, personal impressions, and the Council office's recommendation. A quasi-judicial body may not substitute political direction and subjective speculation for reasoned, record-based agency findings.

C. The Conditions Functionally Deny a Use Expressly Permitted by the Municipal Code

LAMC § 12.24 W.9 expressly permits houses of worship in R2 zones with a CUP. Conditions of approval are intended to mitigate specific, demonstrated impacts; they may not functionally reduce an approved use to a fraction of its intended scope. The Zoning Administrator approved the synagogue use subject to occupancy governed by fire and building-safety review, while the APC halved the main-building capacity and imposed additional restrictions on childcare, symposiums, communications, and sound. By reducing the approved capacity from 147 to 75 without a demonstrated nexus to any particular impact, the APC has effectively denied the use while maintaining the pretense of approval. This is not regulation of the permitted use; it is a functional denial.

D. The Last-Minute Modifications Violated Procedural Due Process Requirements

The last-minute submission of sweeping modifications—filed approximately 28 minutes before the hearing—deprived BMHP of reasonable notice and a meaningful opportunity to respond. The Council office had previously indicated that it was not planning to impose caps or change operations, met with appellants in the days before the hearing, and did not provide BMHP a comparable opportunity to address the proposed conditions. California's procedural due process requirements for quasi-judicial land use proceedings require reasonable notice and an opportunity to be heard before material restrictions are imposed. This procedural deficiency was compounded by the absence of clear RLUIPA guidance at the hearing: the deputy city attorney was unable to advise the Commission on the legal boundaries of its authority under RLUIPA, telling the commissioners only that the law was "vague" and that any answer would be "up to a court to decide." The Commission thus chose to act knowing it lacked the clear legal guidance necessary to ensure that its modifications complied with federal law—a deficiency that the City cannot now cure after the fact. The APC's process, which bent to short-notice political whims, therefore independently invalidates the challenged modifications.

III. DEMAND

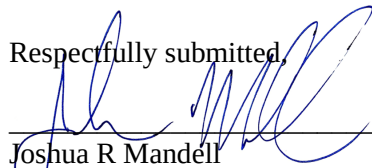
Based on the foregoing, and in light of the City's prior RLUIPA liability in *Congregation Etz Chaim* and *West Valley Christian Center*, we hereby demand that the City take the following actions **within the timeframe within which the APC can reconsider its action**:

1. Deny all appeals in their entirety, vacate any modifications to the Conditions of Approval imposed through the August 25, 2026 appeal decision, and sustain the Zoning Administrator's Determination Letter approving Case No. ZA-2024-6488-CU2;
2. Reinstate the April 9, 2026 CUP approval as issued by Zoning Administrator Phyllis Nathanson, with the six minor clarifications set forth in the BMHP Position (namely: (a) clarification that limited storage and occasional recreational use by caretakers is permitted on the second floor; (b) inclusion of daily Mincha/Ma'ariv services (approximately 30 minutes, 15–25 attendees) in permitted programming; (c) correction of Saturday evening service timing to reflect that services extend approximately one hour after sunset; (d) adjustment of attendance figures for Shavuot and symposium events to realistic ranges within fire code limits; (e) clarification that the 30-minute post-service gathering period includes the backyard area; and (f) a request that inspections not occur inside the sanctuary during active worship services, while fully preserving the City's inspection authority at all other times);

These demands are fully consistent with the BMHP Position as communicated to the Commission through counsel's August 17, 2026 letter and the August 25, 2026 hearing presentation. BMHP has demonstrated its commitment to being a good neighbor and to complying with all conditions of approval. The 40 conditions imposed by the Zoning Administrator represent a comprehensive and carefully crafted framework that protects the interests of the surrounding community while permitting the constitutionally and statutorily protected exercise of religion. No further conditions are warranted, legally permissible, or necessary.

If the City does not comply with the demands set forth herein within the timeframe within which the APC can reconsider its action —that is, by September 8, 2026—the Congregation will pursue all available federal remedies without further notice.

We trust that the City will act promptly to avoid the substantial liability that will follow from continued violation of federal law. We remain available to discuss resolution of this matter at your convenience.

Respectfully submitted,


Joshua R Mandell
Akerman LLP
Counsel for Beis Medrash of Hancock Park

DAY OF HEARING SUBMISSIONS

UPSLOPE 6285-6017 Rodgerton Drive Parcels Profile

<u>Address</u>	<u>Blk</u>	<u>lot</u>	<u>SF lot</u>	<u>SF house</u>	<u>grade</u>	<u>range</u>	<u>year built</u>
6285	13	2	8745	3587			1927
6279 V	13	3	10150		880-924		
6271 V	13	4	9344		876-968		
6261	13	5	10526	2184			1967
6249 V (tied)	13	6	7885	part of 6261			
6243 V	13	7	9420		880-968		
6231	13	8	9427	1932			2002
6209 V	13	9	8947	part of 6201 Rodgerton			
6201**	13	10	19527	4278	890'	890-960' 1963, remo	2013
6165 V	13	11	9048	part of 6201 Rodgerton			
6155 V	13	12	10209		884-980		
6149 V	13	13	12357		892-988		
6145	13	14	10293	2134			1926
6133	13	17	7444	3042			1979
6091	13	18	6215.7	tied to 6133			
6083 V	13	19	10007		884-980		
6075	13	20	9781	2032 (4259)*			2006
6069 V	13	21	11447		872-964		
6063	13	22	8845	2076	868-932		1987
6059 V	13	23	10639		864-956		
6041 V	13	25	9235		850-908		
6023 V	13	26	12118		844-928		
6017 V	13	27	11400		840-928		
6009	13	28	9821	2083			1993, ICO

Summary:

24 total lots 10 built houses, 14 vacant lots 4 houses have more than one lot associated with it. Average lot size 10,117. Average house size;2,335 average vacant lot 10,439(untie)

additional 2,227 SF added illegally not approved by HSP

* this originally held the Norman Castle build in 1924, the tract's model home. It burned in the 1961 fire. Historic documents/films share how the home was built using limited retaining walls inspiring ideals for our specific plan.

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Central Area Planning Commission
200 N. Spring Street, Room 1010
Los Angeles, CA 90012

APCC-2020-1011-ZAA-DRB-SPP-SPE-SPPA
Area Planning Meeting September 8, 2026

Request to reject above project and Planning findings

IV. Applicant Submittal

Biological Resource Report has significant failings

Plant Community

There is no official designation of a plant community called “Fountain Grass Sward Community” Cooper in a previous report correctly designates it as a Disturbed Chaparral Plant Community. Fountain grass is a highly invasive grass that crowds out native plant and it can and should be eradicated where it occurs before it degrades additional native plant communities. This is not an excuse to allow further degrading of the remaining chaparral on site.

Special Plants Status

Non-native grass dominance describes surface vegetation at the time of survey; it does not establish the absence of a dormant native seed bank beneath it. Several of the genera at issue (*Chorizanthe*, *Calochortus*, *Astragalus*) are annual or fire-following species whose seed can remain viable in soil for years, germinating only after fire, specific rainfall timing, or soil disturbance. The BRA’s own stated methodology bases “potential to occur” on direct field observation, CNDDDB records, or known distribution plus habitat overlap — none of which addresses seed-bank presence independent of what was visibly growing on the survey date(s). A single-visit or off-season survey cannot rule out dormant seed for these two Federally- and State-listed species in particular, and the record does not establish that survey timing was matched to their blooming periods or that protocol-level, multi-visit rare plant surveys were conducted

A 2021 biological evaluation by Cooper of a nearby Hollywoodland property (2766/2776 Westshire) documents *Calochortus plummerae* (Plummer’s mariposa-lily, CRPR 4.2). It may very well exist on this property in seed form and could emerge after a rain.

Protected Trees.

The Toyon on the site is described as “small”. However, it satisfies the Los Angeles criteria for protection (4 sq in of branch cross section at 54” height). *Juglans californica* (Southern California black walnut, CRPR 4.2, also independently a Protected Tree under LAMC § 46.00) as occurring in the immediate area. The BRA rates both species “None” for potential to occur on the subject site, stating the study area “lacks granitic or rocky microhabitats” (*Calochortus plummerae*) and “lacks preferred habitats” (*Juglans californica*). The latter finding warrants a closer look given the site’s own conditions: approximately half the property has a northeast-facing slope, the less-exposed, higher-moisture aspect walnut woodland characteristically favors, and Toyon (*Heteromeles arbutifolia*) is confirmed growing on that same slope. Toyon and *Juglans californica* are not incidentally co-located species — the *Juglans californica*/*Heteromeles arbutifolia* Woodland/Forest Association is a recognized vegetation classification for the Santa Monica Mountains (CNPS vegetation classification of the Santa Monica Mountains and Simi Hills). Confirmed Toyon on the site’s NE-facing slope is direct evidence that this recognized association’s habitat conditions exist on the property; whether walnut itself is present has not been specifically investigated on that slope. A “None” determination premised on lacking “preferred habitat” is not

adequately supported where the site's own confirmed vegetation indicates that habitat is present and unsurveyed, rather than absent.

Wildlife Movement

Hollywoodland is unique as it sits inside Griffith Park, has a direct water source (reservoir) which serves protected animals such as mountain lions and has abundant food source (deer). Hollywoodland functions as a linkage between the park's wildlife habitat areas. Residents have documented wildlife camera footage over several seasons that has included mountain lion, deer, coyote, fox, and bobcats. (Below excerpts) These animals are crepuscular, meaning that they are most active in the hours of dusk, dawn, and through the night. Also activity spikes during certain times of the year (i.e. mating season (April-June), pup raising (Jan-Feb)).



Under the California Environmental Quality Act (CEQA), a habitat assessment methodology requires a rigorous, data-driven biological evaluation to determine if a project significantly impacts sensitive species or habitats. Field assessment must have seasonal conditions, exact survey dates, weather, and specific observation methodologies used by qualified personnel. A one day field visit does not meet the requirements by CEQA for proper site evaluation nor is there discussion of the impact of an overheight structure with excessive retaining walls. Given the location and the crucial use of this corridor by wildlife for eco-systemic viability and inter-connectivity, further review by CEQA is essential to mitigate the adverse impacts of proposed outsized development at 6155 Rodgerton.

With these stated deficiencies in the applicants submittal, I request that the APC deny the categorical CEQA exemption and project as a whole.

Regards,

Dr. George A. Clark

Central Area Planning Commission
 200 N. Spring Street, Room 1010
 Los Angeles, CA 90012
APCC-2020-1011-ZAA-DRB-SPP-SPE-SPPA
Area Planning Meeting September 8, 2026

Dear Area Planning Commission,

As a Rodgerton homeowner and resident, I am writing to strongly object to the current project proposed for the vacant lot at 6155 Rodgerton Dr. LA, CA 90068. To insure community safety and minimize negative impacts this project would create for the surrounding neighborhood, it is critical that the project stay within the code and guidelines provided by the Baseline hillside ordinance and Hollywood Specific Plan (HSP).

The applicant has failed to present hardship that would justify the eight exemptions and adjustments they are asking for. Furthermore, I feel the Planning Department has erred in their review of and findings for this project. Specifically:

LAMC 12.24 X.26 ZONING ADMINISTRATOR'S DETERMINATION FINDINGS – RETAINING WALL HEIGHT – AND LAMC 12.28 ZONING ADMINISTRATOR'S ADJUSTMENT FINDINGS – NUMBER OF RETAINING WALLS

Planning Staff justifies relief from code stating that the project site has unique topography challenges such as the severe slope. However lots in Hollywoodland having similar site characteristics, have been built with far less retaining walls in number and height.(ref. 6231 Rodgerton). There are also 10 undeveloped upslope lots on Rodgerton with similar challenges. Granting adjustments from code would set a dangerous precedent for the surrounding undeveloped lots, one that would undermine overall hill stability and safety access issues.

Planning Staff states these retaining walls will not adversely affect the surrounding neighborhood due to topography and plantings. With the Rodgerton site being central within Hollywoodland, upper elevation streets like Deronda will have direct views of the walls as well as be impacted by amplified noise. Plantings on extended height walls have not been successful at camouflaging their appearance or sound reverberation.

There is no hardship presented to justify the excessive number and over height retaining walls. The requirement for these walls is rooted in the design. Amenities such as flat yard areas and swimming pools are a luxury in hillside construction not a right. Severe grades are common in hillside lots and should not be the basis for exceptions. The applicant should look to a design that works with the topography rather than seeking exemptions and adjustments to shoe-horn onto the lot.

SPECIFIC PLAN EXCEPTION FINDINGS – HEIGHT AND RETAINING WALL LOCATION

- 13. That the strict application of the regulations of the specific plan to the subject property would result in practical difficulties or unnecessary hardships inconsistent with the general purpose and intent of the specific plan.**

Planning staff supports applicants request to build to 54 ft in lieu of 36 ft specific plan requirement as well as permission to build retaining walls within the first 3 ft of the property, in the right of way.

Planning references adjacent property at 6201 as being similarly overheight and much larger sq ft. This is misleading as 6201 was built in the 1920's and sits on 3 lots. As both the Baseline Hillside Ordinance and the Specific Plan were introduced much later, this comparison is not valid. Overheight structures violate both the HSP and BHO purposes to protect hillsides from overly massive structures. Planning has failed to identify hardships to justify exemption.

SPECIFIC PLAN PROJECT PERMIT ADJUSTMENT – FRONT YARD SETBACK

- 18. That there are special circumstances applicable to the project or project site which make the strict application of the specific plan regulation(s) impractical.**

Allowing retaining walls to be built in the first three feet, in the right of way violates Section 2F of the Hollywoodland Specific Plan. Keeping right of way unobstructed on Rodgertons' substandard, blind curves is imperative to improving emergency response access and safety through Hollywoodland.

The Applicant is also requesting specific plan relief allowing an 8 ft set back, in lieu of the required 10 ft. Planning erroneously presents 4 Rodgerton properties as validation that relief from set back is consistent with the neighborhood. Yet all 4 properties were built prior to adoption of the Specific Plan. One of the core reasons for the HSP was so that with future builds, the extremely limited infrastructure and neighborhood character could be incrementally improved. Disregarding this core purpose undermines safety and community character. Planning also erroneously state the projects extreme topography as a hardship. As extreme slope is consistent with many of the lots in Hollywoodland thus it is not unusual but common and as such does not necessitate code relief.

Again, there is no hardship demonstrated to support these specific plan exceptions. It is the applicant's design that is incompatible with the lot topography and neighborhood. The projects intrusion into the 10 ft set back is created by the overhang design. This intrusion is solely based in expanding the living area. A more modest size would eliminate the need for relief. Planning does not explore design alterations to accommodate the topography.

CEQA FINDINGS

Hollywoodland is unique as it sits inside Griffith Park, has a direct water source (reservoir) for protected animals such as mountain lions and has abundant food source (deer). Hollywoodland functions as a linkage between the park's wildlife habitat areas. Residents have documented wildlife camera footage on Rodgerton Dr over several seasons that has included mountain lion, deer, coyote, fox, and bobcats. These animals are crepuscular, meaning that they are most active in the hours of dusk, dawn, and through the night. Also activity spikes during certain times of the year (i.e. mating season (april-June), pup raising (Jan-Feb)).

Under the California Environmental Quality Act (CEQA), a habitat assessment methodology requires a rigorous, data-driven biological evaluation to determine if a project significantly impacts sensitive species or habitats. Field assessment must have seasonal conditions, exact survey dates, weather, and specific observation methodologies used by qualified personnel. A one day field visit does not meet the requirements by CEQA for proper site evaluation nor is there discussion of the impact of an overheight structure with excessive retaining walls. There is ample photographic evidence of habitat linkage to dismiss a categorical exemption from CEQA.

I request the APC deny this project and advise Planning to correct the errors in their staff report and resubmit the findings.

Thank you,

Jeanne Clark



Planning APC Central <apccentral@lacity.org>

Case No. APCC-2020-1011-ZAA-ZAD-DRB-SPP-SPE-SPPA 6155 W. Rodgerton

1 message

Lars Gellersen <l.gellersen@artstruc.com>
To: apccentral@lacity.org

Tue, Sep 8, 2026 at 8:56 AM

Dear Zoning Administrator,

My name is Lars Gellersen. My company, Artstruc Inc. (formerly Awesome Development), owns the lot at 6149 W. Rodgerton.

I am writing regarding Case No. APCC-2020-1011-ZAA-ZAD-DRB-SPP-SPE-SPPA concerning the proposed retaining wall for the driveway apron at 6155 W. Rodgerton.

The proposed retaining wall currently extends at an angle into the street dedication in front of my lot—approximately 15 feet diagonally, or 11 feet measured perpendicular to the property line. Instead, this wall should run perpendicular to the street and parallel to the extended property line between 6155 and 6149 W. Rodgerton.

The proposed design severely impedes access to my property for brush clearance, maintenance, and marketing, while visually reducing the lot's size and value. Currently, this adjacent side provides the only viable access to my lot from below. Additionally, expanding the driveway width this manner effectively creates an exclusive parking spot for 6155 in front of my property while severely restricting parking in front of my lot (see attachment).

A survey of upslope lots across the Hollywoodland Specific Plan area—including Beachwood Canyon, Ledgewood Drive, Rodgerton Drive, Deronda Drive, Durand Drive, Hollyridge Drive, Belden Drive, Westshire Drive, Woodhaven Drive, Heather Drive, Dorcas Place, and Lugano Place—shows no precedent for a retaining wall extending at an angle into the street dedication in front of a neighboring property. Retaining walls in street dedications consistently serve as an extension of the property line. Recent developments under the Specific Plan, such as 2756 Westshire Drive, 3072 Hollyridge Drive, 2917 Durand Drive, 6415 Rodgerton Drive, and 3217 Ledgewood Drive, all strictly follow this pattern. There is no practical reason to deviate from this precedent.

While I support the overall project and requested exemptions, I strongly object to the currently proposed configuration of this retaining wall. My support is contingent upon requiring the wall configuration to be rectified as a condition of approval.

Sincerely,

Lars Gellersen

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ARTSTRUC^{INC}
Lars Gellersen REALTOR®

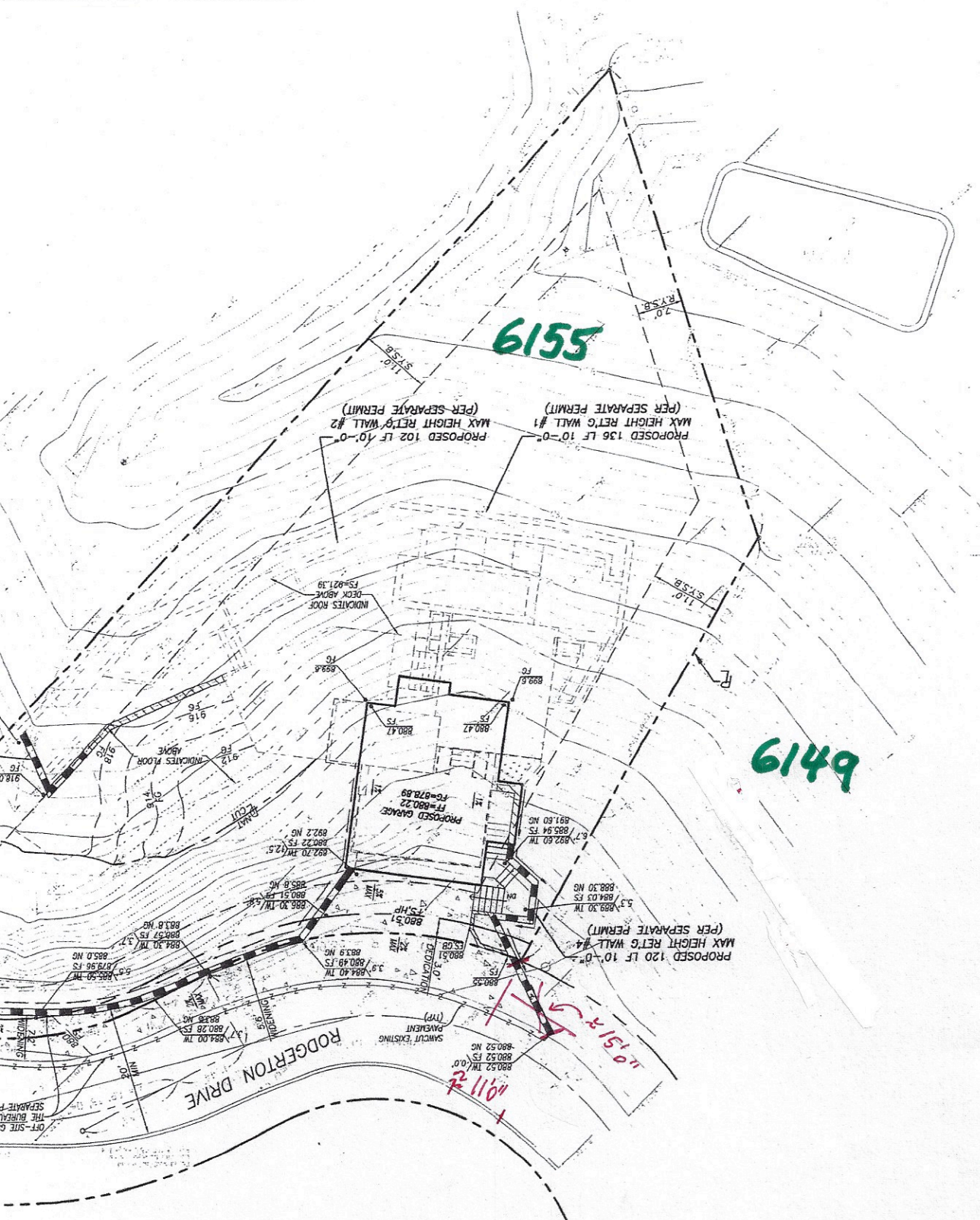
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Construction Consulting

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6155 W Rodgerton Ret. Wall @ Apron.pdf
935K



THE APC MUST DISAPPROVE AND REMAND STAFF REPORT

APCC-2020-1011-ZAA-ZAD-DRB-SPP-SPE-SPPA

6155 West Rodgerton Drive

I. Recommendation

The APC must reject the Staff Report and remand it to the Planning Department:

- **The Staff Description contains numerous factual errors and false conclusions**

On remand, Staff shall correct these errors and conclusions before the Commission can even consider this case. A new and serious study that includes alternatives will arguably conclude that none of the requests are necessary or cannot be justified. The staff description appears to be an attempt to justify the applicant's requests, not to critique them.

- **The Findings are incomplete**

On remand, Staff shall complete the Findings which must address the purpose, intent and provisions of the General Plan, Community Plan, and Specific Plan as required by law. "Substantial conformance" requires analyzing all purposes including those that cut against a project, not just citing those that support. In particular, all purposes of the Specific Plan must be addressed

- **The Findings are lacking relevant evidence or in many cases no evidence and specificity for each requested discretionary action and as such do not support the requested actions.**

On remand, Staff shall list each relevant intent and purpose and find a direct line from the purpose to the Finding as required by case law. (Topanga)

On remand, Staff shall offer supporting evidence on that specific topic, rather than leaving the conclusion resting on assertion alone as it has done for site uniqueness, neighborhood consistency, comparator support.

On remand, Staff shall offer specific, checkable facts which can be immediately verifiable rather than inaccuracies — comparator heights misstated by 4 to 10 feet, a floor area stated two different ways for the same property, and a Specific Plan adoption context materially mischaracterized.

A record combining unsupported assertion on some points with demonstrable error on others does not meet Staff's burden to support the findings as drafted.

II. Incorrect Staff Description

Street Designations and General Circulation: Staff mis-characterizes the ROW issue. The right-of-way is sufficient; to provide the required 20-foot-wide roadway. The City has the authority to remove minor encroachments like garden walls and driveway aprons. ()

Staff describes Rodgerton Drive as a Substandard Hillside Limited Street with a 26-ft right-of-way and a paved roadway of less than 20 ft, attributing the gap to "[v]arious buildings and features... associated with properties on the southern side... encroach[ing] into the public right of way." The legal ROW (26 ft) already exceeds the 20-ft roadway standard by 6 ft; the shortfall is private encroachment, not insufficient ROW width. The City already holds authority to compel removal of such encroachments (LAMC §§ 62.105, 62.118.2), an alternative to relief that the analysis does not consider.

Height: Staff describes the Applicants desire for an extra room-as creating a hardship that justifies an exemption from the Specific Plan height limit. Compliant alternatives exist.

Staff concedes "over-height structures will loom over the right-of-way and conflict with the natural topography," then states the extra 9 ft beyond the site's entitled 45 ft is "to accommodate a sufficiently sized kitchen, living room, and dining room," and that a compliant four-story alternative "would require... more floor area below grade... or... relief from front yard setbacks" instead. No structural, geotechnical, or life-safety justification is offered. Staff's own text documents a design preference for larger rooms and confirms compliant alternatives exist — a preference among available options is not a "practical difficulty or unnecessary hardship."

Floor Area: This analysis is legally irrelevant on Staff's own admission, and undercuts its own height argument ().

Staff describes the project's 2,327 sq ft RFA as "consistent with... the size of surrounding homes" (avg. 2,301 sq ft), citing the comparator at 6201 Rodgerton at two different figures in two sections — 5,881 sq ft and 6,109 sq ft. Staff concedes the Specific Plan has no dwelling-size regulation and that this analysis "would not serve as a legal basis for approval or denial" — the entire subsection is irrelevant on its own terms, and a floor area Staff calls typical undercuts, rather than supports, the separate claim that extra height was needed to achieve it.

Nearby Architectural Styles: The Staff description shows a complete mis-understanding of the origin of the Specific Plan. And the purpose of the Specific Plan

The Character of Hollywoodland was defined in the controlling legislative statement as follows:

- A custom-home, single-family subdivision planned in the early 1920s with a **"European Village" character.**
- A community possessing a **"unique history and architectural character."**
- Hollywoodland **"as it was in the early decades of the Hollywoodland Tract."**
- A product of the original deed restrictions and design-review process.
- A collection of **"Mediterranean, English, French and other traditional cottages and villas"** distinguished by **"uniformly high-quality design and construction."**
- Buildings integrated with the **natural hillside environment** and undeveloped ridgelines.
- Development that avoids overly massive buildings that are out of scale with existing buildings.
- New construction that is compatible with and affirmatively **enhances** the community's character and quality

- Staff Report states 76% of nearby homes “deviate from the Storybook styles” the Specific Plan was adopted to reflect, and concludes the project’s non-conforming style is therefore acceptable (see Exhibit D). Regardless of whether this survey originated with Staff or was supplied by the applicant and adopted into the Staff Report, Staff bears responsibility for the accuracy of what it places in an official recommendation to the Commission — and the statistic does not hold up to the verification Staff should have performed before relying on it. The Specific Plan was adopted in 1992 (Ordinance No. 168,121); at least 75% of the cited homes predate it by decades and were never subject to its review — a fact checkable from the same construction-date data the statistic itself relies on. Widespread pre-existing non-conformance cannot excuse further non-conformance under a Purpose enacted to protect the character that survived. The cited Exhibit D comparators are independently shown to be uniformly irrelevant or incorrect — errors Staff’s own report could have caught by checking DIR approval records before including these properties as support. And the entire statistic answers a question the Specific Plan does not ask: Staff’s own report states the Plan requires a point system “in lieu of requiring one of these architectural styles.”

Grading and Retaining Walls: This site is NOT unique; it is a TYPICAL Hollywoodland vacant lot. The Staff conclusions are not supported by any evidence.

- Staff describes the site as severely sloped (99% at 45%+ grade) with a “unique hardship... different from nearby properties.” No comparative slope data for any neighboring lot is offered to support “unique” or “different.” A parcel-by-parcel elevation summary for Rodgerton Drive shows 6 of 13 lots — nearly half, including two tied with the subject site — exceed a 90-ft grade change. Severe grade change is the general condition on this block, not an exception to it
- Retaining walls are NOT necessary to retain the hillside: The soils report specifically states that soil nailing with mesh (and perhaps hydroseed) is sufficient to retain the existing slopes.
- Open space behind the house is NOT an entitlement, it is a discretionary request. The only requirement is for a setback from toe of slope or retaining wall which is subject to design.
- A retaining wall is NOT required for road widening. The soils report specifically allows soil nailing which can be hydroseeded with native plants.
- The entire paragraph about the unique topography is comical
- All of the houses used to justify high retaining walls were built 65 years before the Specific Plan was enacted. And are thus irrelevant to the subject project.

II. Findings

As stated in the Recommendations, most of the Findings do not address all of the relevant purposes of the General Plan, the Community Plan and the Specific Plan. Rather, the staff has cherry picked a few that support the approval of the Request and then built a case for approval based on opinion and false conclusions. This is precisely the analytic-gap defect that Topanga Assn. for a Scenic Community v. County of Los Angeles (1974) 11 Cal.3d 506 forbids

The most significant error in the Findings is that the staff ignores the original legislative findings in the establishment of the Specific Plan. These legislative findings are reflected in the Purposes of the Hollywoodland Specific Plan and must be followed in the Findings for all the Requests

- A. To protect Hollywoodland, a unique and historical residential community in Hollywood, planned in the early 1920's as a custom home, single family subdivision with a "European Village" character.**
- B. To protect the undeveloped ridgelines enclosing Hollywoodland which are a limited and valuable natural resource, worthy of protection.**
- C. To preserve and build upon the community's natural environment, unique history and architectural character.**
- D. To ensure that new development on the currently 220 vacant lots and redevelopment of the 525 existing homes, particularly those built in the 1960's and 1970's, enhances the character of the community rather than compromises its integrity.**
- E. To protect against development of overly massive buildings which are out-of-scale with the existing buildings.**
- F. To improve fire protection and safety equipment access on narrow, winding streets of substandard width in the Hollywoodland area.**
- G. To protect Hollywoodland as it was in the early decades of the Hollywoodland Tract, when the initial deed restrictions and design review process produced a series of architectural styles consisting of Mediterranean, English, French and other traditional cottages and villas having uniformly high-quality design and construction.**
- H. To permit and facilitate new development as long as it is compatible with and enhances the character and quality of the existing community.**
- I. To protect and enhance the buildings, structures, sites and area of Hollywoodland which are a reminder of the City's history and are unique and irreplaceable assets to the city and to the Hollywood Community.**
- J. To maintain the hillsides for their natural beauty and as appropriate settings for the Hollywoodland development.**
- K. To ensure that new development in the Hollywoodland Specific Plan area is not detrimental to the surrounding community.**

AN OBJECTIVE CONSIDERATION OF THESE PURPOSES AND THE LEGISLATIVE INTENT FOR THE ESTABLISHMENT OF THE HOLLYWOODLAND SPECIFIC PLAN.WILL LEAD TO THE CONCLUSION THAT THIS CONTEMPORARY HOUSE OF EXCESSIVE HEIGHT WITH MULTIPLE OVERHEIGHT RETAINING WALLS NOT ALLOWED IN THE VARIOUS YARDS AND WITHOUT A STATE MANDATED FIRE ACCESS ROADWAY DOES NOT BELONG IN HOLLYWOODLAND AND SHOULD NOT BE APPROVED.



NEW COMPATIBLE HOUSE ON RODGERTON DRIVE



NEW COMPATIBLE HOUSE ON LINFORTH DRIVE



1920'S FRENCH NORMAN REVIVAL HOUSE ON HEATHER DRIVE



1920'S SPANISH REVIVAL HOUSE ON WOODHAVEN DRIVE



1920'S MEDITERRANEAN REVIVAL HOUSE ON BEECHWOOD DRIVE



1920'S TUDOR REVIVAL HOUSE ON LECHNER PLACE



Planning APC Central <apccentral@lacity.org>

ENV-2020-1012-CE /proposed site at 6155 Rodgerton Dr. LA 90068

1 message

Phyllis Rosecrans <phyllisrosecrans@gmail.com>
To: apccentral@lacity.org

Sun, Sep 6, 2026 at 9:30 PM

These are pictures of Rodgerton, the proposed site of [6155 Rodgerton Drive LA 90068](#) Case no.APCC-2020-1011-ZAA-ZAD-DRB-SPP-SPE-SPAA
This is Rodgerton DR. turning left from Beachwood . AI

4 attachments**IMG_7386.HEIC**
2983K**IMG_7387.HEIC**
2393K**IMG_7388.HEIC**
3171K



IMG_7393.HEIC
3073K

Dear Planning Commissioners,

I am writing to support approval of the proposed new single family project at 6155 Rodgerton Drive. The project will enhance the environment in the surrounding area as well as perform a function that is extremely beneficial to the city. The function that the project will perform results in a positive economic impact to the city. The economic contribution involves the creation of jobs during the construction process, sales taxes to the city from the materials being purchased for the project, \$80,000 to the city in application, permit, variance fees and \$25,000 in annual property taxes. Within the first year alone, the project will be contributing at least \$100,000 to the city.

The other benefit of the project involves the creation in the much needed additional housing helping improve the quality of life for Angelenos, given the high demand for housing and lack of affordable options. It helps achieve housing goals and objectives by creating an equitable distribution of housing opportunities by type and cost accessible to all residents of the City.

The proposed project will fit the character of the surrounding community as a low density residential development. It is an infill development that integrates into the existing fabric of the hillside area. The project will be built in accordance with all building codes and with all the requirements of the Fire Department and the Department of Building and Safety.

I fully support the approval of the proposed housing project located at 6155 Rodgerton Drive.

Sincerely,

A handwritten signature in black ink, reading "Wesley Espinoza", written over a horizontal line.

Wesley Espinoza
Property Owner of 6243 Rodgerton Drive