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October 30, 2024

Los Angeles City Council
c/o Office of the City Clerk
City Hall, Room 395
Los Angeles, California 90012

Attention: PLUM Committee Dear Honorable Members:

APPEAL SUMMARY AND STAFF RESPONSE. 1904 – 1906 South Preuss Road; CF 24-1136

Project Background

The proposed project involves the subdivision of two (2) lots into 12 small lots (Lots 1 – 12) and the construction, use, and maintenance of a 12-unit small lot development of which one (1) unit would be set aside for Very Low Income Households. One (1) small lot home would be constructed at each of the 12 small lot subdivisions. Two (2) single-family houses on the project site will be demolished, resulting in a net increase of 10 units through the development of the proposed project. Lots 1 – 6 will be located on the northern portion of the project site and Lots 7 – 12 will be located on the southern portion of the site. Each small lot home will provide two automobile parking spaces located on the ground-floor level, for a total of 24 automobile parking spaces. Vehicular access to the project will be located along a central driveway off of South Preuss Road and the eastern adjacent alley. The project will provide a total of 12 bicycle parking spaces.

On April 22, 2024, the Los Angeles Department of City Planning issued the Small Lot Design Standards Administrative Clearance for the proposed small lot development under Case No. ADM-2023-6116-SLD.

On July 12, 2024, the Advisory Agency conditionally approved Vesting Tentative Tract Map No. 84089-SL-HCA pursuant to LAMC Sections 17.03, 17.15, and 12.22 C.27 with a Class 32 Categorical Exemption to CEQA under Case No. ENV-2023-6117-CE as the environmental clearance for the project. At the conclusion of the project's appeal period, five (5) appeals were filed by local residents. Subsequently, the appeals were scheduled to be heard by the Los Angeles City Planning Commission (CPC) on August 8, 2024.

At its meeting of August 8, 2024, the CPC voted 7-0 to deny the appeals in part and grant the appeals in part, and sustain the decision of the Advisory Agency. As part of its decision to deny and grant the appeals in part, an additional condition was adopted with the Modified Conditions of Approval to require the applicant to explore further design modifications with the Urban Design Studio to the satisfaction of the City Planning Department, Expedited Processing Section. The Determination Letter was issued on September 4, 2024 which included Conditions of Approval modified by the CPC.

In conjunction with the appeals heard by the Los Angeles CPC on August 8, 2024, a related case (Case No. CPC-2023-6115-DB-HCA) was also heard at the same meeting. The CPC voted 7-0 to approve Case No. CPC-2024-6115-DB-HCA for a Density Bonus with a Waiver or Modification of Development Standards. In both cases, the CPC determined that the project is exempt from CEQA pursuant to a Class 32 Categorical Exemption and there is no substantial evidence demonstrating that an exception to a categorical exemption applies.

Following the appeal period for the determination of the first level of appeals of Vesting Tentative Tract Map No. 84089-SL-HCA-1A, four (4) appeals were filed by local residents. For the subject appeals, Staff have compiled the appeal points from the Appellants' Justification/Reason for Appeals. Staff has responded to the appeal points below.

Staff Recommendation

Planning Staff recommends that the PLUM Committee recommend for Council Action to deny the submitted appeals of Vesting Tentative Tract Map No. VTT-84089-SL-HCA-1A and sustain the City Planning Commission's determination, based on the whole of the administrative record, that the project is exempt from CEQA pursuant to State CEQA Guidelines, Section 15332, Article 19 (Class 32), and that there is no substantial evidence demonstrating that an exception to a categorical exemption applies for an exemption from CEQA. The following statements have been compiled and summarized from the submitted appeals and responded to below.

Appeal Summary

At the conclusion of the appeal period for Vesting Tentative Tract Map No. 84089-SL-HCA-1A on September 16, 2024, four (4) appeals were filed by: Meyer Schwarzstein and Susan Kahn, Arielle Mandell, the Concerned Citizens of Shenandoah Street, and Shelly Rothschild. The Appellants contend that 1) The Project is inconsistent with the West Adams – Baldwin Hills – Leimert Community Plan and the Small Lot Design Guidelines; 2) The Project will infringe on the quality of life of the neighboring residents, the value of their property, and the safety of the neighborhood; 3) The determination letter sustaining the Advisory Agency's approval of the subject Vesting Tentative Tract Map is wholly speculative, unfounded, and illusory premised on conditions that may never be satisfied; 4) The Project disregards the South Robertson Neighborhood Council's opposition to the project and community stakeholders, and 5) The Project does not qualify for a Class 32 Categorical Exemption.

Appeal Point #1: The Project is inconsistent with the West Adams – Baldwin Hills – Leimert Community Plan, the Small Lot Design Guidelines, and other city ordinances.

The Appellants, Arielle Mandell, the Concerned Residents of Shenandoah Street, and Shelly

Rothschild, argue that the proposed small lot subdivision resulting in the construction of a 12-unit small lot development is inconsistent with the West Adams – Baldwin Hills – Leimert Community Plan as it violates the following goals, policies, and design guidelines for Single-Family Residential land uses and Multi-Family Residential land uses.

- Maintain single-family neighborhoods that address the diverse socio-economic and physical needs of current and future residents. (Policy LU1.1)
- Preserve, conserve and enhance the positive characteristics of existing neighborhoods that are the foundation for community identity. (Goal LU2)
- Strive to protect existing single-family and low-density residential neighborhoods from encroachment by higher density residential and other incompatible uses. (Policy LU 2-2)
- Seek a high degree of architectural compatibility and landscaping for new infill development as well as additions to existing structures in order to protect the character and scale of existing single-family residential neighborhoods (Policy LU2.3)
- Consider factors such as neighborhood character and identity, compatibility of land uses, impact on livability, impacts on services and public facilities, and impacts on traffic levels when changes in residential, including multi-family residential densities, are proposed. (Policy LU2-4)
- Recommend that any proposed development be designed to enhance and be compatible with adjacent development and topography (Policy LU4-2)
- Strive to maintain neighborhood continuity by targeting new proposed affordable housing to serve existing residents and be designed to complement established neighborhood character. (Policy LU6-1)
- Encourage development parameters that ensure multi-family designated lands provide for adequate housing that is contextually sensitive to desirable prevailing neighborhood character. (Policy LU7-2)
- Ensure that new construction maintains the consistent two-story character of the existing neighborhood. (Policy LU13.1)

The Appellants also contend that the proposed height and bulk of the 12 small lot homes are not compatible with the single-family houses and multi-family structures located near the project site. The Appellants claim that the Vesting Tentative Tract Map is not consistent with the Small Lot Design Guidelines.

Ms. Rothschild also claims that the proposed project violates the Los Angeles Character Residential CPIO Development Regulations, the City's Baseline Mansionization Ordinance, Hillside Ordinance, and the Complete Streets Guide. Ms. Rothschild argues that the project will not increase affordable housing.

Staff Response

The project site involves the subdivision of two (2) lots into 12 small lots for the construction of a 12-unil small lot development in the RD1.5-1 Zone. One (1) small lot home will be constructed at each of the small lot subdivisions. One (1) dwelling unit will be reserved for Very Low Income (VLI) households.

According to LAMC Section 12.09.1, the RD zoning of the project site is defined as a "Restricted Density Multiple Dwelling Zone" and therefore it is not located within a single-family zone as contested by the Appellants. The project site is located within the RD1.5-1 Zone and is consistent

with the General Plan land use designation of Low II Medium Residential in the West Adams – Baldwin Hills – Leimert Community Plan. Therefore, the goals, policies, and design guidelines for Single Family Residential land uses, including Goals and Policies LU1 through LU6 and Design Guidelines G1 through 54, do not apply to the project site and the proposed project. In addition, the project site is not located in the Baldwin Village neighborhood and therefore the goal and policy referred to by Ms. Mandell and the Concerned Residents of Shenandoah Street (Policy LU13-1) does not apply to the project site.

The proposed small lot subdivision is consistent with the goals, policies, and design guidelines of Multi-Family Residential land uses as it will "encourage development parameters that ensure multi-family designated lands provide for adequate housing that is contextually sensitive to desirable prevailing neighborhood character" (Policy LU7-2) and "strive to eliminate residential segregation and concentrations of poverty by promoting affordable housing that is integrated into mixed-income neighborhoods" (Policy LU9-2). The proposed small lot homes will be consistent with the RD1.5-1 Zone development standards and the Multi-Family Residential Design Guidelines found in the Community Plan which dictate Site Planning, Building Design, Storage and Trash Areas, and Freestanding Walls and Retaining Walls. Additionally, the small lot subdivision will be consistent with the City's Small Lot Design Standards. On April 22, 2024, the project received Administrative Clearance for the proposed small lot subdivision under Case No. ADM-2023-6116-SLD. The project complied with applicable sections of the Small Lot Design Standards Checklist including Building Design, Pedestrian Connectivity and Access, and Landscaping. Following the Deputy Advisory Agency hearing held on May 22, 2024 and after listening to community feedback, the applicant provided revised plans that provided additional articulation to the street-facing façade, increased step back of the proposed roof decks, and a decreased the height of the proposed small lot homes. Planning Staff has reviewed the revisions to the project's design in conjunction with the Small Lot Design Standards Checklist and found that the subdivision remains consistent with the Small Lot Design Standards. Therefore, the project is consistent with the Community Plan and the Small Lot Design Standards.

Ms. Rothschild's argument that the project site is in violation of the Los Angeles Character Residential CPIO Development Regulations, the City's Baseline Mansionization Ordinance, and Hillside Ordinance is incorrect as they do not apply to the project site. The project site is not located within any Community Plan Implementation Overlay (CPIO) nor is it located in within a designated Hillside Area. In addition, the City's Baseline Mansionization Ordinance does not apply to this project as the proposed small lot subdivision is not located within a single-family zone. As discussed above, the project site is located within a "Restricted Density Multiple Dwelling Zone". Therefore, the project is not in violation of the Los Angeles Character Residential CPIO Development Regulations, the City's Baseline Mansionization Ordinance, and Hillside Ordinance.

Ms. Rothchild's claim that the project will not result in affordable housing is inaccurate as the project will set aside one (1) small lot unit for Very Low Income Households. Development of the proposed project will demolish the two (2) existing single-family houses on the project site and construct 12 small lot homes for a net increase of 10 units. As such, the project will contribute to an increase in the City's housing supply with 11 market-rate units and one (1) affordable unit.

Appeal Point #2: The Project will infringe on the quality of life of the neighboring residents, the value of their property, and the safety of the neighborhood

Mr. Shwarzstein and Ms. Kahn both reside at the property north of the project site at 1902 South

Preuss Road. Ms. Rothstein resides at the property south of the project site at 1908 South Preuss Road. They claim that the project will adversely impact their quality of life, the value of their property, and the safety of their neighborhood. Their appeal points are summarized below:

a) The project will reduce the solar capacity of Mr. Shwarzstein's and Ms. Kahn's solar panel system, and suggests that the applicant replace their existing solar panel system, provide financial compensation, or reduce the height and setbacks of the proposed project;
b) The project will adversely impact traffic and safety;
c) The project will exacerbate the lack of parking supply in the neighborhood;
d) The project will infringe on residents' privacy;
e) The project will adversely impact internet access;
f) The project will remove trees;
g) The project site is not safe as it is subject to methane, earthquake, and utility issues.
h) The project violates the neighbors' first amendment right by not requiring any religious accommodations during the construction of the project.

Staff's Response

Response to a)

While the proposed 12-unit small lot subdivision will impact the solar capacity of Mr. Shwarzstein's and Ms. Kahn's solar panel system, this does not preclude the construction of new residential dwelling units within the project site which are consistent with the RD1.5-1 zoning of the property and comply with Small Lot Map Standards ("Map Standards") and Design Guidelines. The project will be consistent with the 45-foot maximum building height permitted in the RD1.5-1 Zone. In addition, the project will be consistent with the yard requirements set forth by the underlying zone and the Map Standards. The Map Standards require that the subject subdivision provide a front yard setback of 15 feet for Lot FR 24 (1904 Preuss Road) and 20 feet for Lot 44 (1906 Preuss Road) in accordance with Ordinance No. 140,034. The Small Lot Map Standards also require a minimum side yard setback of 5 feet and a minimum rear yard setback of 5 feet as the project site does not share a property line with a R1 or more restrictive single-family zone. As shown in the Vesting Tentative Tract No. 84089-SL-HCA, the proposed subdivision will provide a side and rear yard setback of 5 feet, and therefore is consistent with the Map Standards. Regarding the front yard setback, the subject subdivision proposes a 10-foot front yard setback in lieu of the previously stated 15 feet and 20 feet through a Density Bonus Waiver of Development Standards request under LAMC Section 12.22 A.25 through a related case, Case No. CPC-2023-6115-DB-HCA. The Waiver request was approved by the City Planning Commission at its meeting on August 8, 2024. Therefore, the potential reduction in solar capacity for Mr. Shwarzstein's and Ms. Kahn's solar panel system does not preclude the proposed small lot subdivision.

Response to b)

The project will not adversely impact traffic and safety in the neighborhood as concluded in the Justification of the Class 32 Categorical Exemption prepared for the subject small lot subdivision and related Case No. CPC-2023-6115-DB-HCA. On May 24, 2024, Planning and Los Angeles Department of Transportation (LADOT) staff completed a Transportation Study Assessment form and determined that the proposed project is not required to conduct a Vehicle Mile Traveled (VMT) analysis, an Access, Safety, and Circulation Evaluation, or an Access Assessment. With the demolition of the two existing single-family houses and the construction of 12 small lot homes,

LADOT's VMT calculator determined that the project will not exceed a daily trip threshold for a VMT analysis. In addition, LADOT has reviewed the project's circulation plan and did not determine that any unusual circumstances exist with ingress and egress from both Preuss Road and the eastern adjacent alley. With the proposed subdivision, the project will comply with the requirements set forth by the Bureau of Engineering in their recommendation report. The project will provide the required street dedications and improvements including a 5-foot dedication along South Preuss Road and a 2.5-foot dedication along the eastern adjacent alley to widen both corridors. Access to the project will be provided off of South Preuss Road and the adjacent eastern alley. The availability of two access points reduces traffic congestion at a single corridor. To create a safe and comfortable space for pedestrians, the project will install landscaping along the front and rear portions of the site including eight (8) trees. Three (3) of the eight (8) trees will be planted at the parkway along South Preuss Road which will provide shade coverage. In addition, the project will feature a variety of windows and balconies facing the street to provide transparency. Therefore, the project does not adversely impact traffic and safety in the neighborhood.

Response to c)

The project will not exacerbate the lack of parking supply in the neighborhood as it will provide the total number of parking spaces required by each small lot home. The project will comply with the automobile parking requirements outlined in LAMC Section 12.21 A.4 and will provide two (2) parking spaces per small lot home for a total of 24 parking spaces.

The project will also promote the use of alternative transportation options by providing a total of 12 bicycle parking spaces. In addition, the project is located approximately 400 feet from the eastbound and westbound bus stops for Metro Local Line 617 which connects riders between Pico/Robertson and Culver City.

Response to d)

To address the privacy concerns raised by the surrounding residents, the proposed 12-unit small lot development was carefully designed such that the placement and orientation of a majority of the project's windows, balconies, and roof decks would not look into the adjacent properties. The project will orientate a majority of its windows and balconies towards the interior of the project site or towards the street. Roof decks will be stepped back and screened with architectural materials to protect neighbors' privacy. Mechanical equipment will be situated at the exterior edges of the roof decks, and similar to the project's balconies they will be orientated towards the interior of the site. The project will install front fences, a rear wall, and two retaining walls along the perimeter of the site to serve as a buffer and screen between the proposed project and abutting properties. Therefore, the project's design respects the privacy of the surrounding residents.

Response to e)

The project will not adversely impact internet access for the surrounding community. The applicant had spoken with Spectrum, an internet service provider which services the community, and Spectrum confirmed that the 12-unit small lot development will not impact the speed of internet service.

Response to f)

The project will remove 13 non-protected trees on-site with the proposed small lot subdivision. Upon completion of the 12-unit small lot development, the project will plant five (5) on-site trees and three (3) street trees along the parkway of South Preuss Road.

Response to g)

The proposed project will not result in significant impacts related to methane, subsidence, and earthquakes based on the Geology and Soils Reports prepared for the project site in 2021 and 2023, respectively, and a Site Methane Investigation Report prepared in 2022. On May 5, 2024, the Los Angeles Department of Building and Safety (LADBS) issued a Geology and Soils Report Approval Letter and found that the referenced reports are acceptable provided that a set of conditions be complied with during site development. These conditions were included in the Determination Letter for the subject Vesting Tentative Tract Map under Condition Nos. 11 – 57. The project is required to comply with these conditions to obtain permits and proceed with development. Regarding methane at the project site, the Site Methane Investigation Report found that the project requires no methane mitigation system. The appellant's claim that the provided technical reports assessing methane, subsidence, and earthquakes is false as these reports were prepared within the last three years, and they have concluded that the project will not have a significant impact.

As discussed in the Justification of the Class 32 Categorical Exemption, the project site can be adequately served by all required utilities and public services.

Therefore, project will not result in significant impacts related to methane, subsidence, and earthquakes and the project site is adequately served by all required utilities and public services.

Response to h)

The project developer is committed to respecting the concerns of the project's neighbors throughout the construction phase. The project is subject to regulatory compliance measures including compliance with the City's Noise Ordinance and LAMC Sections 41.40 and 112.05. LAMC Section 41.40 limits construction and repair activities to the hours between 7:00 a.m. and 9:00 p.m. on weekdays, 8:00 a.m. and 6:00 p.m. on any Saturday, and prohibits construction noise generation at any time on Sundays and national holidays. LAMC Section 112.05 establishes a noise threshold for the operation of any powered equipment or hand tool within any residential zone or within 500 feet thereof.

Appeal Point #3: The determination letter sustaining the Advisory Agency's approval of the Vesting Tentative Tract Map is wholly speculative, unfounded, and illusory premised on conditions that may never be satisfied.

Ms. Rothschild argues that the project violates the West Adams – Baldwin Hills – Leimert Community Plan, lacks any verifiable and certain basis and foundation, and is illusory as the Conditions of Approval have not been met.

Staff's Response

On July 12, 2024, the Advisory Agency of the City of Los Angeles issued a determination letter approving the subject Vesting Tentative Tract Map, with a total of 102 Conditions of Approval, Standard Small Lot Home Conditions, Bureau of Engineering Standard Conditions, and the Findings of the Subdivision Map Act. Following the hearing for the appeals filed on the Vesting Tentative Tract Map, the City Planning Commission issued a determination letter on September 4, 2024 granting the appeals in part, denying the appeals in part, and sustaining the decision of the Advisory Agency. The City Planning Commission also adopted Modified Conditions of Approval which included one (1) additional design condition addressing the exploration of design modifications with the Urban Design Studio to the satisfaction of the City Planning Department, Expedited Processing Section.

Ms. Rothschild's argument demonstrates a lack of understanding of the processing and clearing of conditions for the project. The subdivider is required to meet all the conditions outlined in the Determination Letter for the subject Vesting Tentative Tract Map by the City before any permits are issued. The determination letter includes all the prescribed findings pursuant to Sections 66473.1, 66474.60, .61 and .63 of the State of California Government Code (the Subdivision Map Act, including Finding No. (a) which addresses the project's consistency with the West Adams – Baldwin Hills – Leimert Community Plan. Therefore, Ms. Rothschild's claim that the determination is speculative, unfounded, and illusory is premature as the project has not yet initiated the condition clearance of the approved Modified Conditions of Approval.

Appeal Point #4: The Project disregards the South Robertson Neighborhood Council's opposition to the project.

Ms. Rothschild contends that the Determination Letter issued by the Los Angeles CPC "flagrantly disregards the rejection of this development by the SORO Neighborhood Council, which is uniquely qualified and charged with its assessment".

Staff's Response

The applicant's team met with the South Robertson Neighborhood Council and community stakeholders on multiple occasions to discuss the proposed project and address any concerns. The applicant has made various design changes that provide additional articulation to the street-facing façade, increased step back of the proposed roof decks, and a decreased the height of the proposed small lot homes. Although concerns of the project still remain, the project is consistent with the RD1.5-1 zoning of the project site, the goals and policies of the West Adams – Baldwin Hills – Leimert Community Plan, the State's Subdivision Map Act, and the Small Lot Design Standards as discussed in the Determination Letter and Staff's Response to Appeal Points No. 1 and 2. SORO NC's opposition to the project does not preclude the proposed small lot subdivision.

Appeal Point #5: The Project does not qualify for a Class 32 Categorical Exemption.

The appellants, Arielle Mandell and Concerned Residents of Shenandoah Street, contends that the Class 32 Categorical Exemption was issued in error as a) the project will increase hazards due to a geometric design feature or incompatible uses due to the ingress/egress at the hazardous alley; b) the VMT calculations do not include construction VMT analysis or a haul route; and c) the cumulative impact analysis prepared for the Class 32 Categorical Exemption narrowly focuses

on three projects within 500 feet. Therefore, the project does not qualify for a Class 32 Categorical Exemption.

Staff's Response

On April 25, 2024, Planning Staff drafted a Justification determining that the proposed project is exempt from CEQA pursuant to a Class 32 Categorical Exemption and that there is no substantial evidence demonstrating that an exception to a categorical exemption applies. Supporting the Class 32 Categorical Exemption are technical reports and documents that had been prepared in 2023 and 2024, and address air quality, noise impacts, water quality, traffic, methane, geology and soils, and trees. Based on these reports, the proposed project will not result in a significant impact to the environment.

Response to a)

The proposed small lot division and the construction of a 12-unit small lot development will not increase hazards due to a geometric design feature or incompatible uses due to ingress/egress at the alley. The Los Angeles Department of Transportation (LADOT) utilizes a Vehicle Miles Traveled (VMT) Calculator as a project-screening criteria to determine if a proposed project will require a VMT Analysis. With the demolition of the two existing single-family houses and the construction of 12 small lot homes, the project will not exceed a daily trip threshold of 250 trips with 38 net daily trips and therefore the project is not required to perform a VMT Analysis. In addition, Planning and LADOT staff completed a Transportation Study Assessment form on May 24, 2024 and found that the proposed project is not required to conduct a Access, Safety, and Circulation Evaluation or an Access Assessment. LADOT has reviewed the circulation plan and did not determine that any unusual circumstances exist with ingress and egress from both Preuss Road and the eastern adjacent alley. With the proposed subdivision, the project will comply with the requirements set forth by the Bureau of Engineering in their recommendation report. The project will provide the required street dedications and improvements, as well as 2.5-foot dedication along the alley to complete a 10-foot-wide half alley as conditioned in Condition No. 2 of the Determination Letter. In order to complete the 20-foot-wide full alley, the property located at 1905 Shenandoah Street would need to provide a 2.5-foot at the rear portion of their lot that abuts the alley. Therefore, the project will not increase hazards due to a geometric design feature or incompatible uses due to ingress/egress at the eastern adjacent alley.

Response to b)

The project's potential VMT impacts related to project construction, operation, and the project's haul route were evaluated in the Air Quality Report and the California Emissions Estimator Model, or CalEEMOD. Based on the findings of the report and model, the project is not expected to result in potentially significant air quality impacts due to the movement of earth materials, such as soil and dirt, to and from the project site. The number of trips generated during project construction will not exceed the City's threshold for determining a potentially significant traffic impact. Therefore, project-related construction activities will not result in a significant traffic impact.

Response to c)

The Cumulative Impact categorical exception applies when, although a particular project may not have a significant impact, the impact of successive projects, of the same type, in the same place,

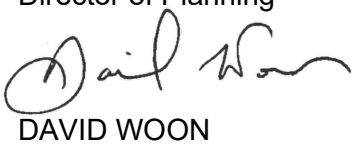
over time is significant. The cumulative impact analysis conducted for this project identified three (3) multi-unit residential projects within a 500-foot radius that have been approved by the Planning Department. These residential projects are consistent with the zoning of the properties surrounding the project site which are zoned RD1.5-1 and RD2-1 and the current development pattern in the surrounding neighborhood. The appellant's assertion that a 500-foot radius is too narrow is arbitrary and they do not provide any additional projects that are of the same type, in the same place, over time. Therefore, the cumulative impact analysis for this project was conducted appropriately.

Conclusion

Based on the information in the record and after consideration of the appellant's arguments for appeal, Staff recommends that the appeal of Vesting Tentative Tract Map No. 84089-SL-HCA-1A be denied. For the reasons stated in Staff's Responses to the Appeal Points raised by the Appellants, the Advisory Agency did not err or abuse its discretion in approving Vesting Tentative Tract Map No. 84089-SL-HCA nor did the City Planning Commission err or abuse its discretion in sustaining the decision of the Advisory Agency. The proposed project is categorically exemption from CEQA pursuant to CEQA Guidelines, Section 15332, and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies; and the proposed map is consistent with the State's Subdivision Map Act, the City of Los Angeles General Plan, the West Adams – Baldwin Park – Leimert Community Plan and the Los Angeles Municipal Code. Therefore, it is recommended that the PLUM Committee deny the appeals and sustain the decision of the City Planning Commission and Advisory Agency.

Sincerely,

VINCENT P. BERTONI, AICP
Director of Planning



DAVID WOON
Planning Assistant

HB:EA:DW