

# Holland & Knight

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*Via E-mail (clerk.plumcommittee@lacity.org)*

Planning and Land Use Management Committee  
City of Los Angeles City Council  
Councilman Marqueece Harris-Dawson, Chair  
Councilman Gilbert Cedillo  
Councilman Bob Blumenfield  
Councilman Mark Ridley-Thomas  
Councilman John Lee  
200 N. Spring Street  
Los Angeles, California 90012

**Re: CPC-2020-6192-GPAJ-HD-CU-MCUP-SPR-HCA Proposed Additional  
Conditions of Approval in Support of Appeal/CF-19-0392-S1/Item #14 of  
October 5, 2021 PLUM Agenda**

Dear Honorable Councilmembers:

Holland & Knight LLP represents TF Shatto LP, the owner of the proposed 367 dwelling unit and 36,400 square foot commercial mixed-use high rise project (the "Project") at 550 S. Shatto Place in the City of Los Angeles (the "City"). The Project would also preserve, rehabilitate, and convert the existing church building (currently serving as a basketball court) into restaurant uses. The Project would also provide a large publicly accessible plaza and include more than 40 new very low and extremely low income dwelling units.

The City Planning Commission ("CPC") approved all elements of the Project except for the initially proposed 90 Transient Occupancy Residential Structure ("TORS") dwelling units. TF Shatto LP has listened to the valid concerns of the CPC and proposes to modify the TORS component in a good faith effort in response. With City imposition of the following conditions of approval that would reduce the number of TORS units to 54 dwelling units, we hope that you grant the TORS appeal to further an innovative and flexible housing typology and all around great

project that would be an asset to the City. These proposed new conditions of approval include the following:

- i. **Add condition 31 from CPC Staff Report (as modified herein): The project shall be permitted a maximum of 54 TORS units consisting of 54 co-living units. (a) To ensure that the TORS co-living dwelling units are used primarily for long term housing, the short term stays (i.e., less than 30 days) must not be more than 25 percent of the nights available for the 270 bedrooms within the 54 TORS co-living dwelling units. (b) Total nights used for short term stays will be tracked through the project's payment of Transient Occupancy Tax and enforced by the City. (c) There shall be a minimum seven (7) day stay for each TORS dwelling unit. (d) The Applicant shall not market the Project's TORS units on AirBnB or other similar short-term on-line rental platforms.**
- ii. **Modify Q Condition 3 to add this language (from CPC Staff Report): For purposes of calculating the required on-site restricted affordable units, the TORS units shall be considered in total number of units proposed. For the purposes of designating units as on-site restricted affordable units, the TORS units shall be excluded.**

With the imposition of these additional conditions of approval, the City Council should grant the appeal to allow the Project's innovative and less costly type of housing. The Project team will be attending the telephonic hearing on October 5th so as to answer any questions or concerns.

Sincerely yours,

HOLLAND & KNIGHT LLP



Ryan M. Leaderman

cc: Craig Bullock, Heather Bleemers, Oliver Netburn, Damon Chan, Ly Tang, Alex Irvine,  
Tim Moran