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September 15, 2022

**BY EMAIL (clerk.plumcommittee@lacity.org)**

Los Angeles City Council  
c/o Candy Rosales, Legislative Assistant  
200 North Spring Street, Room 272  
Los Angeles, CA 90012

**Re: Property Address: 3209-3227 West Sunset Boulevard**  
**Council File 22-0468**  
**Case No.** CPC-2021-2035-DB-CU-CUB-SPR-HCA; ENV-2021-2036-CE  
**Hearing Date:** August 2, 2022, Agenda Item 1

Dear Councilmembers:

On September 16, 2022, you will be asked to vote to confirm the Planning and Land Use Management Committee's ("PLUM") denial of two appeals filed by two Silver Lake residents ("Appellants") in connection with the above-captioned project (the "Project").

Appeals brought before PLUM are intended to be meaningful opportunities for residents of this City to present arguments that will be considered for good cause. As PLUM's chairman noted at the end of argument, "we have instructions to deny this appeal, or these appeals," demonstrating that PLUM is little more than political theatre that merely acts as a rubber stamp for the views of a particular council member. The vote was a unanimous denial, as it was for every appeal brought before PLUM that day, and as it typically is for appeals brought before PLUM as a routine matter. Such disregard for the issues raised by residents/appellants is an abuse of discretion and contrary to the intent and purpose of PLUM as established by the City's Charter and regulations.

The appeals brought with respect to the above-referenced Project do not raise issues of NIMBY-ism or discretion, but of material environmental impact and public safety. Relieving developers of most interior parking requirements means that this City will be unable to address California's EV mandate in the coming years, as the City is allowing developers to push thousands and thousands of gas-powered vehicles onto crowded side streets where they will emit greenhouse gas emissions as they search for parking, and will remain gas-powered vehicles as long as residents are forced to park on streets that lack EV charging facilities. The City's knowing and intentional drive to push new-density residents' vehicles onto side streets rather than require interior parking with EV-charging potential is in conflict with California environmental law, and

represents an abandonment of the City's future air quality for the present profits of developers. These issues were not considered by a PLUM that acted on "instructions to deny this appeal, or these appeals," and which thereby abused its discretion.

The vote that you are being asked to make on September 16, 2022, is not ratification of a considered decision, but ratification of political theatre. If PLUM will not carry out its role as a proper appellate body, then the entire City Council should take the place of PLUM, return the issue for reconsideration by the CPC, or otherwise act to ensure that City residents have a meaningful process for consideration of material issues that impact their environment and public safety.

Anything less would be nothing more than further political theatre. Our City deserves an approach to new density that will not materially harm our air quality, compromise our ability to meet the coming EV mandate, and harm public safety in Very High Fire Hazard Severity Zones. PLUM did not consider these issues before acting on its instructions. It is incumbent upon our City Council to do more than rubber stamp a decision that was, itself, a rubber stamp.

For all of the reasons addressed in Appellants' respective briefs, letters, and argument, I respectfully request that the City reject PLUM's denial of our appeals, and require a CEQA review for this Project.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Richardson", with a long horizontal flourish extending to the right.

David J. Richardson

cc: <https://cityclerk.lacity.org/publiccomment/>