

APPLICATIONS

APPEAL APPLICATION Instructions and Checklist



PURPOSE

This application is for the appeal of Los Angeles Department of City Planning determinations, as authorized by the LAMC. For California Environmental Quality Act Appeals, use form [CP13-7840](#). For Building and Safety Appeals and Housing Department Appeals, use form [CP13-7854](#).

RELATED CODE SECTION

Refer to the Letter of Determination (LOD) for the subject case to identify the applicable Los Angeles Municipal Code (LAMC) Section for the entitlement and the appeal procedures.

APPELLATE BODY

Check only one. If unsure of the Appellate Body, check with City Planning staff before submission.

- ☐ Area Planning Commission (APC) ☐ City Planning Commission (CPC) ☐ City Council
☐ Zoning Administrator (ZA)

CASE INFORMATION

Case Number: _____

APN: _____

Project Address: _____

Final Date to Appeal: _____

APPELLANT

Check all that apply.

- ☐ Person, other than the Applicant, Owner or Operator claiming to be aggrieved
☐ Representative ☐ Property Owner ☐ Applicant ☐ Operator of the Use/Site

APPELLANT INFORMATION

Appellant Name: _____

Company/Organization: _____

Mailing Address: _____

City: _____ **State:** _____ **Zip Code:** _____

Telephone: _____ **E-mail:** _____

Is the appeal being filed on your behalf or on behalf of another party, organization, or company?

☐ Self ☐ Other: _____

Is the appeal being filed to support the original applicant's position?

☐ YES

☐ NO

REPRESENTATIVE / AGENT INFORMATION

Name: _____

Company/Organization: _____

Mailing Address: _____

City: _____ **State:** _____ **Zip Code:** _____

Telephone: _____ **E-mail:** _____

JUSTIFICATION / REASON FOR APPEAL

Is the decision being appealed in its entirety or in part?

☐ Entire

☐ Part

Are specific Conditions of Approval being appealed?

☐ YES

☐ NO

If Yes, list the Condition Number(s) here: _____

On a separate sheet provide the following:

☐ Reason(s) for the appeal

☐ Specific points at issue

☐ How you are aggrieved by the decision

APPLICANT'S AFFIDAVIT

I certify that the statements contained in this application are complete and true.

Appellant Signature: 28 Date: _____

GENERAL NOTES

A Certified Neighborhood Council (CNC) or a person identified as a member of a CNC or as representing the CNC may not file an appeal on behalf of the Neighborhood Council; persons affiliated with a CNC may only file as an individual on behalf of self.

The appellate body must act on the appeal within a time period specified in the LAMC Section(s) pertaining to the type of appeal being filed. Los Angeles City Planning will make its best efforts to have appeals scheduled prior to the appellate body's last day to act in order to provide due process to the appellant. If the appellate body is unable to come to a consensus or is unable to hear and consider the appeal prior to the last day to act, the appeal is automatically deemed denied, and the original decision will stand. The last day to act as defined in the LAMC may only be extended if formally agreed upon by the applicant.

THIS SECTION FOR CITY PLANNING STAFF USE ONLY

Base Fee: \$7,575.20

Reviewed & Accepted by (DSC Planner): Jason Chan

Receipt No.: 200301443189 Date: 8/21/25

☒ Determination authority notified

☐ Receipt Number

GENERAL APPEAL FILING REQUIREMENTS

If dropping off an appeal at a Development Services Center (DSC), the following items are required. See also additional instructions for specific case types. To file online, visit our [Online Application System \(OAS\)](#).

APPEAL DOCUMENTS

1. Hard Copy

Provide three sets (one original, two duplicates) of the listed documents for each appeal filed.

☐ Appeal Application

☐ Justification/Reason for Appeal

- ☐ Copy of Letter of Determination (LOD) for the decision being appealed

2. Electronic Copy

- ☐ Provide an electronic copy of the appeal documents on a USB flash drive. The following items must be saved as individual PDFs and labeled accordingly (e.g., “Appeal Form”, “Justification/Reason Statement”, or “Original Determination Letter”). No file should exceed 70 MB in size.

3. Appeal Fee

- ☐ *Original Applicant.* The fee charged shall be in accordance with [LAMC Section 19.01 B.1\(a\) of Chapter 1](#) or [LAMC Section 15.1.1.F.1.a. \(Appeal Fees\) of Chapter 1A](#) as applicable, or a fee equal to 85% of the original base application fee. Provide a copy of the original application receipt(s) to calculate the fee.
- ☐ *Aggrieved Party.* The fee charged shall be in accordance with [LAMC Section 19.01 B.1\(b\) of Chapter 1](#) or [LAMC Section 15.1.1.F.1.b. \(Appeal Fees\) of Chapter 1A](#) as applicable

4. Noticing Requirements (Applicant Appeals Only)

- ☐ *Copy of Mailing Labels.* All appeals require noticing of the appeal hearing per the applicable LAMC Section(s). Original Applicants must provide noticing per the LAMC for all Applicant appeals. See the Mailing Procedures Instructions ([CP13-2074](#)) for applicable requirements.

SPECIFIC CASE TYPES

ADDITIONAL APPEAL FILING REQUIREMENTS AND / OR LIMITATIONS

DENSITY BONUS (DB) / TRANSIT ORIENTED COMMUNITIES (TOC)

Appeal procedures for DB/TOC cases are pursuant to [LAMC Section 13B.2.5. \(Director Determination\) of Chapter 1A](#) or [LAMC Section 13B.2.3. \(Class 3 Conditional Use\) of Chapter 1A](#) as applicable.

- Off-Menu Incentives or Waiver of Development Standards are not appealable.
- Appeals of On-Menu Density Bonus or Additional Incentives for TOC cases can only be filed by adjacent owners or tenants and is appealable to the City Planning Commission.

- ☐ Provide documentation confirming adjacent owner or tenant status is required (e.g., a lease agreement, rent receipt, utility bill, property tax bill, ZIMAS, driver's license, bill statement).

WAIVER OF DEDICATION AND / OR IMPROVEMENT

Procedures for appeals of Waiver of Dedication and/or Improvements (WDIs) are pursuant to [LAMC Section 12.37 I of Chapter 1](#) or [LAMC Section 10.1.10. \(Waiver and Appeals\) of Chapter 1A](#) as applicable.

- WDIs for by-right projects can only be appealed by the Property Owner.
- If the WDI is part of a larger discretionary project, the applicant may appeal pursuant to the procedures which govern the main entitlement.

[VESTING] TENTATIVE TRACT MAP

Procedures for appeals of [Vesting] Tentative Tract Maps are pursuant [LAMC Section 13B.7.3.G. of Chapter 1A](#).

- Appeals must be filed within 10 days of the date of the written determination of the decision-maker.

NUISANCE ABATEMENT / REVOCATIONS

Appeal procedures for Nuisance Abatement/Revocations are pursuant to [LAMC Section 13B.6.2.G. of Chapter 1A](#). Nuisance Abatement/Revocations cases are only appealable to the City Council.

Appeal Fee

- ☐ *Applicant (Owner/Operator)*. The fee charged shall be in accordance with the [LAMC Section 19.01 B.1\(a\) of Chapter 1](#) or [LAMC Section 15.1.1.F.1.a. \(Appeal Fees\) of Chapter 1A](#) as applicable.

For appeals filed by the property owner and/or business owner/operator, or any individuals/agents/representatives/associates affiliated with the property and business, who files the appeal on behalf of the property owner and/or business owner/operator, appeal application fees listed under [LAMC Section 19.01 B.1\(a\) of Chapter 1](#) shall be paid, at the time the appeal application is submitted, or the appeal application will not be accepted.

- ☐ *Aggrieved Party*. The fee charged shall be in accordance with the [LAMC Section 19.01 B.1\(b\) of Chapter 1](#) or [LAMC Section 15.1.1.F.1.b. \(Appeal Fees\) of Chapter 1A](#) as applicable.

August 19, 2025

Los Angeles City Council
201 N. Spring Street
Room 340
Los Angeles, CA 90012

Re: 201 Sotello St. – Appeal of City Planning Commission Determination
(TT-51669-IND-M3-1A)

To Whom it May Concern:

This firm represents S & R Partners LLC, the owner (“Owner”) of the property located at 201 West Sotello Street (the “Property”) regarding the above-referenced tract map modification case. On behalf of the Owner, we hereby appeal the City Planning Commission’s August 11, 2025, determination (the “Determination”), as it violates state law through, among other things, the imposition of Quimby in-lieu fee.¹

Specifically, Determination Condition of Approval No. 38(a) states that “Prior to the issuance of a Certificate of Occupancy for a residential project, the applicant shall pay the applicable Park Fee to the Department of Recreation and Parks, which shall be calculated as a Subdivision (Quimby in-lieu) fee.”²

For context, the Department of Recreation and Parks sets forth two separate Park Fees: (i) \$17,964.00 for Residential Subdivision projects and (ii) \$8,805.00 for Non-Subdivision residential projects. The map modification here would bring the underlying tract map into compliance with the subsequently adopted Cornfield Arroyo Specific Plan (“CASP”). There is no tentative tract map approval or subdivision of the Property here, and therefore the Quimby fee condition violates state law for several reasons.

¹ The Owner incorporates by reference its prior correspondence to the City regarding this matter, including but not limited to letters of April 7, 9, and 30, 2025, and July 8, 2025.

² The Determination also contains a number of other conditions that the City has no legal authority to impose. However, given it is the most egregious legal violation, the Owner focuses here on the Quimby fee condition.

In summary:

- (i) The imposition of this additional, illegal subdivision-level fee is the difference between a future housing project going forward, or not. Not only is the fee illegal and improper, it is cost prohibitive. If the fee is imposed, no new housing will be created, and the property will simply remain a bus parking lot.
- (ii) Determination finding No. 2 – stating that the requested modification to the tract map does not impose any additional burden on the present fee owner of the property – cannot be made. Imposing the subdivision-level Quimby fee on a non-subdivision project adds a \$3.7M additional burden on a 400-unit project.
- (iii) The City has treated the Applicant and the Owner inconsistently and unfairly. The City previously approved an identical map modification request for the adjacent property within the same tract, with a housing project contemplated at the time, and did not impose a Quimby fee. The treatment of the Applicant and the Owner here is arbitrary, capricious, and violates Equal Protection guarantees.
- (iv) The initial Letter of Determination from the Advisory Agency did not contain a Quimby fee condition. Only after the Applicant appealed did staff insert the condition. Imposition of the additional fee during the appeal process is retaliatory, inappropriate and unfair.

For all of these reasons, we request that Condition 38(a) be modified as follows:

“Prior to the issuance of a Certificate of Occupancy for a residential project, the applicant shall pay the applicable Park Fee to the Department of Recreation and Parks, which shall be calculated as a non-Subdivision Residential Project fee, unless a subsequent request for further subdivision of the tract is a component of such future request.”

As set forth in more detail below, Condition 38(a) violates state law for several reasons.

1. Government Code sec. 66472.1 prohibits the City from imposing additional burdens on the Owner as part of a map modification approval.

The City cannot impose Subdivision-level Quimby fees on the Project because such imposition would violate the Subdivision Map Act (the “Map Act”), Government Code section 66472.1, which governs the approval of map modifications, and prohibits the City from imposing additional burdens on the Owner as part of the modification approval:

“[A]fter a final map...is filed in the office of the county recorder, the recorded final map may be modified by a certificate of correction or an amending map...if the local agency finds that there are changes in circumstances that make any or all of the conditions of the map no longer appropriate or necessary and that **the modifications do not impose any additional burden on the fee owners of the real property**, and if the modifications do not alter any right, title, or interest in the real property reflected on the recorded map, and the local agency finds that the map as modified conforms to Section 66474. Any modification shall be set for public hearing as provided for in Section 66451.3. The local agency shall confine the hearing to consideration of, and action on, the proposed modification.”

Under the City’s proposed condition 38(a), if the Owner was to eventually move forward with a residential project, it would owe millions in Quimby fees above non-subdivision park fees, which is obviously a substantial additional burden not present under the current recorded map.

The Determination provides no legal explanation for how the City can impose such a burden. Instead, it states that the Determination does not “impose any additional planning or zoning requirements.” That is not what the Map Act says, and the City has invented a standard to support its illegal condition.³

Troublingly, during the project’s CPC hearing, City Planning staff improperly informed Commissioners that the Owner sought to avoid all park fees, allowing Commissioners to believe that not imposing Quimby Subdivision-level fees would mean imposing no park fees. This is not true. In the event the Owner moves forward with a residential project, it will owe millions in park fees, as detailed above. But the City cannot impose Quimby in-lieu fees, which are substantially higher than the fees the Owner would otherwise owe.

2. The Map Modification is Not a Subdivision and Therefore Provides No Trigger for Imposition of Quimby Fees

The plain language of the Quimby Act, which is codified in Gov. Code Section 66477, makes clear that the City’s authority to impose a Quimby in-lieu fee only applies to “the approval of a tentative map or parcel map” for a “residential” project. Gov. Code Section 66477(a). Here, neither the approval of a tentative map nor parcel map is at issue; the Project instead requests a modification to an approved map in relevant part to modify the uses permitted at the Property, pursuant to Gov. Code section 66472.1. As such, there is no legal authority for the imposition of Quimby fees, as the trigger for their imposition does not exist.

³ The Determination also states that it has received no opposition from adjacent property owners to the map modification as further evidence of the lack of an additional burden on the Owner. This has nothing to do with whether the City is imposing additional burdens on the Owner.

The Determination acknowledges this, as Condition No. 38(a) states that payment of Quimby fees shall be due “[p]rior to the issuance of a Certificate of Occupancy[.]” But the LAMC, following state law, states, in section 12.33-B, that Quimby fees “shall be payable at the time of the recording of the final map[.]” Here, no map is being recorded, as the tract map in question was recorded decades ago. The City tries to avoid the legal force of the plain language of the Map Act and the LAMC by again inventing a legal trigger (payment of Quimby fees at certificate of occupancy) that does not exist.

Again, the Determination provides no legal explanation or argument for how the City can impose Quimby fees outside of approval of a tentative map, or at a time other than recordation of a final map. Nor does the Determination explain how the map modification is somehow a “subdivision” as that term is used in the Map Act. Gov. Code section 66424, defines a subdivision as “the division, by any subdivider, of any unit or units of improved or unimproved land, or any portion thereof...for the purpose of sale, lease, or financing, whether immediate or future.” (Emphasis added). The Modification does not divide the Property, as the Property was already divided decades ago and a final map recorded. *See Cox v. City of Oakland* (2025) 17 Cal.4th 362, 373-374 (section 66424 concerns the “creation of a parcel” through the “division of land” for “sale, lease, or financing.” (Emphasis added).

Here, the Modification creates no parcel and is therefore not a subdivision. Nor is the Modification necessary for the sale, lease, or financing of any lot in the existing subdivision, as all such lots could have been (and could be) sold, leased, or financed, as they are existing legal lots created by the decades-old final map. The lot configuration approved thirty years ago will remain after the Modification, which only concerns the permitted use of the parcels and seeks to align such permitted uses with existing zoning.

3. The City Approved a Map Modification at an Adjacent Property and Imposed No Quimby Fee or Additional Conditions

In 2018, the City approved a modification to Tract Map No. 51669 (the same tract map at issue in the Project) to modify the conditions applicable to the adjoining site located at 200 Mesnager St. Like the Project, the Department of Recreation and Parks sought to unlawfully impose a new Quimby fee condition for the requested Mesnager St. modification. Upon request and argument of the applicant of that modification, the City removed the proposed unlawful Quimby fee condition, which was not included in the modified conditions of approval.⁴

Failing to remove the condition of approval here would present issues of procedural and substantive fairness, given the overlapping issues and the resulting disparate outcomes, particularly where the imposition of the condition is both unlawful and unauthorized.

⁴ The conditions of approval for that modification are available at <https://planning.lacity.gov/pdiscaseinfo/document/MTg4ODk50/03b6cd7a-61f3-4d27-8bc5-9bb6e20119bc/pdd>.

City Planning staff have repeatedly misstated the record as to 200 Mesnager Street, claiming, despite written evidence to the contrary, that 200 Mesnager Street did not involve a residential project but that 201 Sotello Street does. Putting aside that such a distinction does not provide the City with legal authority to impose Quimby fees here, the claim is demonstrably false. As detailed in this office's April 9, 2025, letter, the record discloses that the City knew there was a residential project proposed for 200 Mesnager in conjunction with the tract map modification application and stated so in the Mesnager application's hearing notice, among other written statements indicating the City knew the Mesnager application concerned a proposed residential project (the Mesnager site now contains a 290-unit apartment building).

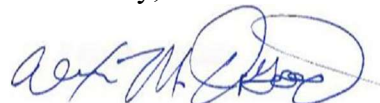
4. Public Policy Requires Removal or Modification of the Condition

Currently in Los Angeles, there is more than a one-million-unit deficit of housing. The shortage of housing is at crisis levels, which the January fires further exacerbated. The Mayor and the City Council continue to express the need for housing. Notwithstanding this posture, the Applicant and the Owner have been working with the City for two (2) years on a map modification request to allow this site to accommodate housing and other non-industrial uses in conformance with current zoning.

The Owner has already agreed to dozens of additional project-specific conditions of approval that have no legal nexus to a map modification request in order to move the process along. But the imposition of unlawful Quimby fees in addition to the other conditions imposed make a future project infeasible. If the City wants housing and other redevelopment on a lot opposite a state park, then it needs to support those who are trying to build it.

We urge City Council to grant the appeal and conform the map modification with state law.

Sincerely,



Alexander M. DeGood



LOS ANGELES CITY PLANNING COMMISSION

200 North Spring Street, Room 272, Los Angeles, California, 90012-4801, (213) 978-1300

www.planning.lacity.org

LETTER OF DETERMINATION

MAILING DATE: AUGUST 11, 2025

Case No.: TT-51669-IND-M3-1A

Council District: 1 – Hernandez

CEQA: 93-0244 (MND); ENV-2009-599-EIR (SCH No. 2009031002)

Plan Area: Central City North

Related Cases: TT-51669-IND; TT-51669-IND-M1; TT-51669-IND-M2

Project Site: 201 West Sotello Street

Applicant/

Appellant: Kacy Keys, Praxis Development Group
Representative: Dana Sayles, three6ixty

At its meeting of **July 10, 2025**, the Los Angeles City Planning Commission took the actions below in conjunction with the following Project:

Modification of Condition Nos. 12.a, 12.b, 12.c and S-3 (m) of the recorded final Tract Map No. 51669-IND for Lot Nos. 1, 3 and 4.

1. **Found**, based on the independent judgment of the decision-maker, after consideration of the whole of the administrative record, the project was assessed in Mitigated Negative Declaration, No. 93-0244, adopted on July 11, 1994; and the Cornfield Arroyo Seco Specific Plan (CASP) Environmental Impact Report No. ENV-2009-599-EIR, SCH No. 2009031002, certified on June 28, 2013, and the addendum dated September 23, 2022, and pursuant to CEQA Guidelines 15162 and 15164, no major revisions are required to the EIR and no subsequent EIR, negative declaration, or addendum is required for approval of the Project;
2. **Denied** the appeal in part; **granted** the appeal in part and **modified** the Advisory Agency's Determination of Tract Map No. TT-51669-IND-M3 for modification to Condition Nos. 12.a, 12.b, 12.c and S-3 (m) of the recorded final Tract Map No. 51669-IND for Lot Nos. 1, 3 and 4, located at 201 West Sotello Street, as shown on map stamp-dated November 17, 2023;
3. **Adopted** the attached Modified Conditions of Approval; and
4. **Adopted** the attached Amended Findings.

The vote proceeded as follows:

Moved: Saitman
Second: Cabildo
Ayes: Choe, Klein, Mack
Absent: Diaz, Lawshe, Zamora

Vote: 5 – 0



Cecilia Lamas, Commission Executive Assistant II
Los Angeles City Planning Commission

Fiscal Impact Statement: There is no General Fund impact as administrative costs are recovered through fees.

Effective Date/Appeals: The decision of the Los Angeles City Planning Commission as it relates to the modification of a recorded Final Tract Map is appealable to the Los Angeles City Council **within 10 days** after the mailing date of this determination letter. Any appeal not filed within the **10-day** period shall not be considered by the Council. All appeals shall be filed on forms provided at the Planning Department's Development Service Centers located at: 201 North Figueroa Street, Fourth Floor, Los Angeles, CA 90012 or 6262 Van Nuys Boulevard, Suite 251, Van Nuys, CA 91401.

FINAL APPEAL DATE: AUGUST 21, 2025

Notice: An appeal of the CEQA clearance for the Project pursuant to Public Resources Code Section 21151(c) is only available if the Determination of the non-elected decision-making body (e.g., ZA, AA, APC, CPC) **is not further appealable** and the decision is final.

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

Attachments: Modified Conditions of Approval, Amended Findings, Appeal Filing Procedure

cc: Jane Choi, Principal City Planner
Vanessa Soto, Senior City Planner
Yi Lu, City Planner

CONDITIONS OF APPROVAL

(As Modified by the City Planning Commission at its meeting on July 10, 2025)

Modify Condition No. 10 to read as follows:

10. Comply with any applicable requirements with the Department of Building and Safety, Grading Division prior to the issuance of any building permit.

Grading Division approvals are conducted at 221 North Figueroa Street, 12th Floor Suite 1200. The approval of this Tract Map Modification shall not be construed as having been based upon a geological investigation such as will authorize the issuance of the building permit of the subject property.

12. Prior to the issuance of a building permit, the subdivider will prepare and execute two copies of a covenant and agreement (Planning Department Form CP-6770) in a manner satisfactory to the Department of Building and Safety and the Planning Department, binding the subdivider and all successors to the following:

- a. Limit the industrial development to a maximum of 367,605 square feet of gross floor area, exclusive of the floor area used for automobile parking spaces, for basement storage or for rooms housing mechanical equipment incidental to the operation of the building.

The maximum floor area permitted on a lot may be exceeded by transferring unused floor area from another lot within the tract. In no event shall a lot be left with less than a total of 10,000 square feet of permitted floor area or have an excess of 1.5:1 FAR. In addition, the overall permitted floor area for the tract shall not exceed 367,605 square feet.

Whenever the subdivider chooses to transfer floor area, a new Covenant and Agreement must be recorded to reflect the changes.

Notwithstanding the above, the limitations on floor area shall not apply to Lot Nos. 1, 2, 3, 4, and a portion of Lot No. 8 as identified in Exhibits A and B of Instrument No. 97-1724079 and as described as follows:

Lot 1, of Tract No. 51669, in the City of Los Angeles, County of Los Angeles, State of California, as per map filed in Book 1221 Page(s) 1 through 4 inclusive of maps, in the office of the County Recorder of said county.

Lot 2 of Tract No. 51669, in the City of Los Angeles. County of Los Angeles, State of California, as per map filed in Book 1221 Pages 1 through 4 inclusive of maps, in the Office of the County Recorder of said county; along with that portion of Lot 8 of said Tract 51669 described as follows:

Beginning at the northwest corner of Lot 8 of said Tract 51669, thence along the northwest line of said Lot 8, north 53° 45' 57" east 248.08 feet to the northeast line of said Lot 8 shown on said Tract No. 51669 as having a bearing of north 35 10 14 west; thence along said northeast line south 35° 10' 14" east 25.31 feet; thence south 58° 05' 27" west 249.43 feet to the southwest line of said Lot 8; thence along said southwest line north 31° 44' 52" west 16.54 feet to the point of beginning, as

per certificate of compliance recorded October 30, 1997 as instrument No. 97-1724079, of official records.

Lot 3 of Tract No 51669, in the City of Los Angeles, County of Los Angeles, State of California, as per map filed in Book 1221 Pages 1 through 4, inclusive of maps, in the office of the County Recorder of said county.

Lot 4 of Tract No. 51669, in the City of Los Angeles, County of Los Angeles, State of California, as per map filed in Book 1221, Pages 1 through 4, inclusive of maps, in the office of the County Recorder of said county.

The maximum floor area on each lot shall be limited as follows:

Lot No.	Maximum Floor Area* Permitted (sq. ft.)
5	25,379
6	19,272
7	18,480
8**	38,462
9	28,490
10	25,951
11	11,880
12	14,995
13	14,361

*Floor Area per Planning and Zoning Code Section 12.03.

**Excludes portion of Lot No. 8 as described above.

- b. The use of the site shall be limited to warehousing/manufacturing, except for Lot Nos. 1, 2, 3, 4, and a portion of Lot No. 8 as described in Condition No. 12.a. Development of Lot Nos. 1, 2, 3, 4, and a portion of Lot No. 8 shall be in conformance with the applicable zoning regulations.
- c. Provide, as a minimum, warehouse parking in compliance with Section 12.21.A.4(c) of the Los Angeles Municipal Code, except for Lot Nos. 1, 2, 3, 4, and a portion of Lot No. 8 as described in Condition No. 12 (a). Parking for the development of Lot Nos. 1, 2, 3, 4, and a portion of Lot No. 8 shall be in conformance with the applicable zoning regulations.

Modify Condition No. 14 to read as follows:

- 14. Prior to the issuance of a building permit, to assure that cable television facilities will be installed in the same manner as other required improvements, the applicant shall email ita.cabletvclearance@lacity.org, which provides an automated response with the instructions on how to obtain the Cable TV clearance. The automated response also provides the email address of three people in case the applicant/owner has any additional questions.

Modify Condition No. S-1 (I) to read as follows:

BUREAU OF ENGINEERING - STANDARD CONDITIONS

- S-1. (l) That any necessary additional street dedications be provided to comply with the Americans with Disabilities Act (ADA) of 2010.

Modify Condition No. S-3 (c), (h) and (m) to read as follows:

- S-3. That the following improvements are either constructed prior to the issuance of a building permit or that the construction is suitably guaranteed:

- (c) Install street lighting facilities to serve the tract as required by the Bureau of Street Lighting.

1) Construct new street light: one (1) on Naud St.

NOTES:

The quantity of streetlights identified may be modified slightly during the plan check process based on illumination calculations and equipment selection.

Conditions set: 1) in compliance with Cornfield Arroyo Seco Specific Plan, 2) by Los Angeles Department of Transportation, or 3) by other legal instrument excluding the Bureau of Engineering conditions, requiring an improvement that will change the geometrics of the public roadway or driveway apron may require additional or the reconstruction of street lighting improvements as part of that condition.

- (h) Construct any necessary additional street improvements to comply with the 2010 Americans with Disabilities Act (ADA) Standards for Accessible Design.
- (m) Improve Sotello Street adjoining Lot No. 4 of the tract by the repair and or replacement of any damaged, cracked or off-grade concrete curb, gutter, sidewalk and roadway pavement including any necessary removal and reconstruction of the existing improvements satisfactory to the City Engineer.

Add Conditions Nos. S-3 (n) to (s) to read as follows:

- (n) Improve North Spring Street adjoining Lot Nos. 1 and 3 of the tract by the repair and or replacement of any damaged, cracked or off-grade concrete curb, gutter, sidewalk and roadway pavement including any necessary removal and reconstruction of the existing improvements satisfactory to the City Engineer.
- (o) Improve Mesnager Street adjoining Lot No. 1 of the tract boundary by the repair and or replacement of any damaged, cracked or off-grade concrete curb, gutter, sidewalk, and roadway pavement including any necessary removal and reconstruction of the existing improvements satisfactory to the City Engineer.
- (p) Improve Naud Street adjoining Lot Nos. 3 and 4 of the tract boundary as a public paseo, as identified in the attachment to the letter from Council District 1, dated April 9, 2025, adjoining Lot Nos. 3 and 4 of the tract boundary. The paseo shall not conflict with any Fire Department requirements for building access for life safety purposes. Said paseo is identified in the Draft Cornfield Arroyo Seco Specific Plan (CASP) Update, Exhibit D1, Chapter 8, Streets, Page 101 (Council File No. 13-0078-S2).

Note: If the Applicant applies for a building permit application prior to the effective date of the CASP Update (Council File No. 13-0078-S2), the applicant may file a request for a Specific Plan Project Exception (SPPE) for CASP compliance (Ordinance No. 182,617).

Note: Conditions 17-18 are carried over from the Advisory Agency's Letter of Determination for TT-51669-IND-M1 dated April 11, 2018.

ADD Condition Nos. 19-23 to read as follows:

BUREAU OF ENGINEERING - SPECIFIC CONDITIONS

Any questions regarding this report should be directed to the Case Management Permit Division, located at 201 North Figueroa Street, Suite 290, or by calling (213) 808-8604.

19. That the subdivider make a request to the Central District Office of the Bureau of Engineering to determine the capacity of existing sewers in this area.
20. That Naud Street adjoining Lot Nos. 3 and 4 of the tract boundary, shall be provided as a paseo through an easement, as identified in the attachment to the letter from Council District 1, dated April 9, 2025.
21. That 15-foot radius property line returns or 10-foot by 10-foot cut corners be provided as an easement at the intersection of Naud Street and Sotello Street.
22. That a Covenant and Agreement be recorded advising all future owners and builders that prior to issuance of a building permit, a Notice of Acknowledgement of Easement must be recorded and an application to do work in any sewer and drainage easements and to construct over any existing facilities must be submitted to the City Engineer for review and approval.
23. That no portion of the proposed development shall encroach within the new public right-of-way, this includes any encroachments above or below the grade.

Add Condition No. 24 to read as follows:

DEPARTMENT OF BUILDING AND SAFETY, ZONING DIVISION

An appointment is required for the issuance of a clearance letter from the Department of Building and Safety. The applicant is asked to contact Laura Duong at (213) 482-0434 or Laura.Duong@lacity.org to schedule an appointment.

24. Prior to the issuance of a building permit, the Department of Building and Safety, Zoning Division shall certify that no Building or Zoning Code violations exist on the subject site. In addition, the following items shall be satisfied:
 - a. Obtain approval from the Advisory Agency for the modification request to modify Conditions No. 12.a, 12.b, and 12.c.

- b. Show all street dedication(s) as required by Bureau of Engineering and provide net lot area after all dedication. "Area" requirements shall be re-checked as per net lot area after street dedications. Front yard requirements shall be required to comply with current code as measured from new property lines after dedication(s).

Notes:

This property is located in a Liquefaction Zone.

The existing or proposed building plans have not been checked for and shall comply with Building and Zoning Code requirements. With the exception of revised health or safety standards, the subdivider shall have a vested right to proceed with the proposed development in substantial compliance with the ordinances, policies, and standards in effect at the time the subdivision application was deemed complete. Plan check will be required before any construction, occupancy or change of use.

If the proposed development does not comply with the current Zoning Code, all zoning violations shall be indicated on the Map.

Add Condition No. 25-29 to read as follows:

DEPARTMENT OF TRANSPORTATION

Transportation approvals are conducted at 201 N. Figueroa Street Room 550. For an appointment, contact LADOT's One Stop email at: ladot.onestop@lacity.org. Prior to the issuance of a building permit, the subdivider shall submit plans to the Department of Transportation, for review and approval, demonstrating compliance with the following conditions or those modified at the time by the Department of Transportation:

- 25. A minimum of 20-foot reservoir space be provided between any security gate(s) and the property line when driveway is serving less than 100 parking spaces. Reservoir space will increase to 40-feet and 60-feet when driveway is serving more than 100 and 300 parking spaces respectively or as shall be determined to the satisfaction of the Department of Transportation.
- 26. Parking stalls shall be designed so that a vehicle is not required to back into or out of any public street, LAMC 12.21 A.
- 27. Driveway(s) and vehicular access for residential component of any development should be limited to the street with lowest classification or as shall be determined to the satisfaction of the Department of Transportation.
- 28. The project must adhere to the requirements outlined in the Cornfield Arroyo Seco Specific Plan (CASP) (Ordinance 182,617) and associated recommendations. In collaboration with LADOT's Central District Office, the applicant is tasked with conducting traffic signal warrant studies for the intersections of Spring/Sotello and Spring/Mesnager, as designated in the CASP Chapter 3- Streets, Section E, Street Intersection Design Regulations (Page 3-14) for signal installation.
- 29. A parking area and driveway plan be submitted to the Citywide Planning Coordination

Section of the Department of Transportation for approval prior to submittal of building permit plans for plan check by the Department of Building and Safety.

Add Condition No. 30 to read as follows:

FIRE DEPARTMENT

The applicant is further advised that all subsequent contact regarding these conditions must be with the Hydrant and Access Unit. This would include clarification, verification of condition compliance and plans or building permit applications, etc., and shall be accomplished BY APPOINTMENT ONLY, in order to assure that you receive service with a minimum amount of waiting please call (213) 482-6543. You should advise any consultant representing you of this requirement as well.

30. Prior to the issuance of a building permit, a suitable arrangement shall be made satisfactory to the Fire Department, binding the subdivider and all successors to the following conditions or those modified at the time by the Fire Department:
- a. Access for Fire Department apparatus and personnel to and into all structures shall be required.
 - b. Address identification. New and existing buildings shall have approved building identification placed in a position that is plainly legible and visible from the street or road fronting the property.
 - c. One or more Knox Boxes will be required to be installed for LAFD access to project.
 - d. Location and number to be determined by LAFD Field Inspector. (Refer to FPB Req # 75).
 - e. The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.
 - f. No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.
 - g. Fire Lane Requirements:
 - 1) Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.
 - 2) The width of private roadways for general access use and fire lanes shall not be less than 20 feet, and the fire lane must be clear to the sky.

- 3) Fire lanes, where required and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.
 - 4) Submit plot plans indicating access road and turning area for Fire Department approval.
 - 5) All parking restrictions for fire lanes shall be posted and/or painted prior to any Temporary Certificate of Occupancy being issued.
 - 6) Plans showing areas to be posted and/or painted, "FIRE LANE NO PARKING" shall be submitted and approved by the Fire Department prior to building permit application sign-off.
 - 7) Electric Gates approved by the Fire Department shall be tested by the Fire Department prior to Building and Safety granting a Certificate of Occupancy.
 - 8) All public street and fire lane cul-de-sacs shall have the curbs painted red and/or be posted "No Parking at Any Time" prior to the issuance of a Certificate of Occupancy or Temporary Certificate of Occupancy for any structures adjacent to the cul-de-sac.
 - 9) No framing shall be allowed until the roadway is installed to the satisfaction of the Fire Department.
- h. Construction of public or private roadway in the proposed development shall not exceed 10 percent in grade.
 - i. Where above ground floors are used for residential purposes, the access requirement shall be interpreted as being the horizontal travel distance from the street, driveway, alley, or designated fire lane to the main entrance of individual units.
 - j. The Fire Department may require additional vehicular access where buildings exceed 28 feet in height.
 - k. The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.
- I. 2014 CITY OF LOS ANGELES FIRE CODE, SECTION 503.1.4 (EXCEPTION)

- i. When this exception is applied to a fully fire sprinklered residential building equipped with a wet standpipe outlet inside an exit stairway with at least a 2 hour rating the distance from the wet standpipe outlet in the stairway to the entry door of any dwelling unit or guest room shall not exceed 150 feet of horizontal travel AND the distance from the edge of the roadway of an improved street or approved fire lane to the door into the same exit stairway directly from outside the building shall not exceed 150 feet of horizontal travel.
 - ii. It is the intent of this policy that in no case will the maximum travel distance exceed 150 feet inside the structure and 150 feet outside the structure. The term "horizontal travel" refers to the actual path of travel to be taken by a person responding to an emergency in the building.
 - iii. This policy does not apply to single-family dwellings or to non-residential buildings.
- m. Site plans shall include all overhead utility lines adjacent to the site.
- n. Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.
- o. No proposed development utilizing cluster, group, or condominium design of one or two family dwellings shall be more than 150 feet from the edge of the roadway of an improved street, access road, or designated fire lane.
- p. Construction of public or private roadway in the proposed development shall not exceed 10 percent in grade.
- q. Private development shall conform to the standard street dimensions shown on Department of Public Works Standard Plan S-470-0.
- r. Standard cut-corners will be used on all turns.
- s. The Fire Department may require additional roof access via parapet access roof ladders where buildings exceed 28 feet in height, and when overhead wires or other obstructions block aerial ladder access.
- t. The proposed project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Safety Plan, which is an element of the General Plan of the City of Los Angeles.
- u. Recently, the Los Angeles Fire Department (LAFD) modified Fire Prevention Bureau (FPB) Requirement 10. Helicopter landing facilities are still required on all High-Rise buildings in the City. However, FPB's Requirement 10 has been revised to provide two new alternatives to a full FAA-approved helicopter landing facilities.

- v. Each standpipe in a new high-rise building shall be provided with two remotely located Fire Department Connections (FDCs) for each zone in compliance with NFPA 14-2013, Section 7.12.2.
- w. During demolition, the Fire Department access will remain clear and unobstructed.
- x. The Fire Department has no objection to the Airspace Vacation.
- y. 5101.1 Emergency responder radio coverage in new buildings. All new buildings shall have approved radio coverage for emergency responders within the building based upon the existing coverage levels of the public safety communication systems of the jurisdiction at the exterior of the building. This section shall not require improvement of the existing public safety communication systems.
- z. That in order to provide assurance that the proposed common fire lane and fire protection facilities, for the project, not maintained by the City, are properly and adequately maintained, the sub-divider shall record with the County Recorder, prior to the recordation of the final map, a covenant and agreement (Planning Department General Form CP-6770) to assure the following:
 - i. The establishment of a property owners association, which shall cause a yearly inspection to be, made by a registered civil engineer of all common fire lanes and fire protection facilities. The association will undertake any necessary maintenance and corrective measures. Each future property owner shall automatically become a member of the association or organization required above and is automatically subject to a proportionate share of the cost.
 - ii. The future owners of affected lots with common fire lanes and fire protection facilities shall be informed of their responsibility for the maintenance of the devices on their lots. The future owner and all successors will be presented with a copy of the maintenance program for their lot. Any amendment or modification that would defeat the obligation of said association as the Advisory Agency must approve required hereinabove in writing after consultation with the Fire Department.
 - iii. In the event that the property owners association fails to maintain the common property and easements as required by the CC and R's, the individual property owners shall be responsible for their proportional share of the maintenance.
 - iv. Prior to any building permits being issued, the applicant shall improve, to the satisfaction of the Fire Department, all common fire lanes and install all private fire hydrants to be required.
 - v. That the Common Fire Lanes and Fire Protection facilities be shown on the Final Map.

- aa. The plot plans shall be approved by the Fire Department showing fire hydrants and access for each phase of the project prior to the recording of the final map for that phase. Each phase shall comply independently with code requirements.
- bb. Any roof elevation changes in excess of 3 feet may require the installation of ships ladders.
- cc. Provide Fire Department pathway front to rear with access to each roof deck via gate or pony wall less than 36 inches.
- dd. Building designs for multi-storied residential buildings shall incorporate at least one access stairwell off the main lobby of the building; But, in no case greater than 150ft horizontal travel distance from the edge of the public street, Private Street or Fire Lane. This stairwell shall extend onto the roof.
- ee. Entrance to the main lobby shall be located off the address side of the building.
- ff. Any required Fire Annunciator panel or Fire Control Room shall be located within 20ft visual line of site of the main entrance stairwell or to the satisfaction of the Fire Department.
- gg. Where rescue window access is required, provide conditions and improvements necessary to meet accessibility standards as determined by the Los Angeles Fire Department.
- hh. Adequate off-site public and on-site private fire hydrants may be required. Their number and location to be determined after the Fire Department's review of the plot plan.
- ii. Any required fire hydrants to be installed shall be fully operational and accepted by the Fire Department prior to any building construction.

Add Condition No. 31 to read as follows:

DEPARTMENT OF WATER AND POWER

- 31. Prior to the issuance of a building permit, satisfactory arrangements shall be made with the Los Angeles Department of Water and Power (LADWP) for compliance with LADWP's Water System Rules and requirements. Upon compliance with these conditions and requirements, LADWP's Water Services Organization will forward the necessary clearances to the Bureau of Engineering.

Add Condition No. 32 to read as follows:

BUREAU OF STREET LIGHTING – SPECIFIC CONDITIONS

Street Lighting clearance for this Street Light Maintenance Assessment District condition is conducted at 1149 S. Broadway Suite 200. Street Lighting improvement condition clearance will be conducted at the Bureau of Engineering District office, see condition S-3. (c).

32. Prior to the issuance of a building permit or issuance of the Certificate of Occupancy (C of O), street lighting improvement plans shall be submitted for review and the owner shall provide a good faith effort via a ballot process for the formation or annexation of the property within the boundary of the development into a Street Lighting Maintenance Assessment District.

Add Condition No. 33 to read as follows:

BUREAU OF SANITATION

33. Wastewater Collection Systems Division of the Bureau of Sanitation has inspected the sewer/storm drain lines serving the subject tract and found potential problems to their structure or potential maintenance problem, as stated in the memo dated April 18, 2024. Upon compliance with its conditions and requirements, the Bureau of Sanitation, Wastewater Collection Systems Division will forward the necessary clearances to the Bureau of Engineering. (This condition shall be deemed cleared at the time the City Engineer clears Condition No. S-1. (d)).

Add Condition Nos. 34-36 to read as follows:

URBAN FORESTRY DIVISION AND THE DEPARTMENT OF CITY PLANNING

34. Prior to the issuance of a building permit, the project shall preserve all healthy mature street trees whenever possible. All feasible alternatives in project design should be considered and implemented to retain healthy mature street trees. A permit is required for the removal of any street tree and shall be replaced 2: 1 as approved by the Board of Public Works and Urban Forestry Division.
35. When street dedications are required and to the extent possible, the project shall provide larger planting areas for existing street trees to allow for growth and planting of larger stature street trees. This includes and is not limited to parkway installation and/or enlargement of tree wells and parkways.
36. Plant street trees at all feasible planting locations within dedicated streets as directed and required by the Bureau of Street Services, Urban Forestry Division. All tree plantings shall be installed to current tree planting standards when the City has previously been paid for tree plantings. The sub divider or contractor shall notify the Urban Forestry Division at: (213) 847- 3077 upon completion of construction for tree planting direction and instructions.

Note: Removal of street trees requires approval from the Board of Public Works. All projects must have environmental (CEQA) documents that appropriately address any removal and replacement of street trees. Contact Urban Forestry Division at: (213) 847-3077 for tree removal permit information.

Add Condition No. 37 to read as follows:

DEPARTMENT OF CITY PLANNING - SITE SPECIFIC CONDITIONS

Clearances may be conducted at the Figueroa, Valley, or West Los Angeles Development Services Centers. To clear conditions, an appointment is required, and can be requested at planning.lacity.org.

37. Prior to the issuance of a building permit, the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a manner satisfactory to the Planning Department, binding the subdivider and all successors to the following:
 - a. That the subdivider consider the use of natural gas and/or solar energy and consult with the Department of Water and Power and Southern California Gas Company regarding feasible energy conservation measures.

Add Condition No. 38 to read as follows:

DEPARTMENT OF RECREATION AND PARKS

38. Park Fee
 - a. Prior to the issuance of a Certificate of Occupancy for a residential project, the applicant shall pay the applicable Park Fee to the Department of Recreation and Parks, which shall be calculated as a Subdivision (Quimby in-lieu) fee.
 - b. Prior to the issuance of a building permit for a non-residential project, the Applicant shall record a Covenant and Agreement, the language of which shall be subject to the approval of the Department of Recreation and Parks, stating that the future development of Lots 1, 3, and 4 is for non-residential purposes prior to the issuance of Certificate of Occupancy.

FINDINGS

(As Amended by the City Planning Commission at its meeting on July 10, 2025)

FINDINGS OF FACT (CEQA)

The Advisory Agency found, based on the independent judgment of the decision-maker, after consideration of the whole of the administrative record, the project was assessed in Mitigated Negative Declaration, No. 93-0244, adopted on July 11, 1994; and the Cornfield Arroyo Seco Specific Plan Environmental Impact Report No. ENV-2009-599-EIR, SCH No. 2009031002, certified on June 28, 2013, and the addendum dated September 23, 2022, and pursuant to CEQA Guidelines 15162 and 15164, no major revisions are required to the EIR and no subsequent EIR, negative declaration, or addendum is required for approval of the project.

FINDINGS OF FACT (SUBDIVISION MAP ACT, LAMC Chapter 1)

In connection with the modification of recorded Tract No. 51669-IND, the Advisory Agency of the City of Los Angeles, pursuant to the State of California Government Code Sections 66427.1 (the Subdivision Map Act), makes the prescribed findings as follows:

1. That there are changes in circumstances which make any or all of the conditions of such map no longer appropriate or necessary.

The subject site and the scope of the modification request comprised of Lot Nos. 1, 3, and 4 of recorded Tract No. 51669-IND, which encompasses a total of 13 lots, as initially approved in 1994. The site is located within the Central City North Community Plan, and the Cornfield Arroyo Seco Specific Plan (CASP) which was adopted after the original 1994 Tract Map approval.

Prior to the Los Angeles City Council's adoption of the CASP on June 28, 2013, the site had a land use designation of Light Industrial and was zoned MR2-1. On July 11, 1994, the Advisory Agency approved Tract No. 51669-IND. Among the conditions of approvals, several were implemented as mitigation measures, including Condition No. 12. Condition No. 12 contained conditions which implemented mitigation measures which were intended to reduce impacts of future development of the parcels to be created by the recordation of the map. The conditions and mitigation measures were appropriate as it related to the zoning and land use designation at the time of the approval.

On August 14, 2013, the CASP became effective, which amended the land use designations and zoning for properties located within the boundaries of the plan area requiring specific development standards in regards to building form, urban design, open space, and street standards. The zoning of the subject site (Lot Nos. 1, 3, and 4 of Tract No. 51669-IND) was changed to Urban Village, or UV(CA) per the CASP. The Urban Village zone allows for a mix of uses, including multi-family residential, light manufacturing and assembly, wholesale, commercial office, schools, hotels, entertainment, and cultural facilities uses. Additional uses and increased floor area permitted by the CASP were analyzed as part of the certified Environmental Impact Report (EIR), Case No. ENV-2009-599-EIR. The CASP greatly expanded the range of uses and the permitted density and floor area allowed on the subject site. Specifically, the project site now has a permitted

base Floor Area Ratio (FAR) of 3:1, or 1.5:1 for projects with more than 15 residential units. The FAR on the site may be increased up to 5:1 through use of the CASP's Floor Area Bonus and/or Transfer of Floor Area Rights (TFAR) program. Projects may obtain said increase in floor area greater than the otherwise maximum floor area permitted by demonstrating compliance with the CASP requirements, including street improvement requirements set forth herein.

Subsequently, on April 11, 2018, the Advisory Agency conditionally approved a modification (Tract No. 51669-IND-M1) of Condition No. 12 of recorded Tract No. 51669-IND allowing the property located at 200 N. Mesnager Street (Lot 2 and a portion of Lot 8) to be redeveloped in accordance with the standards, regulations, and policies of the CASP. At the time of the filing of the first modification, there was no specific development plan or program proposed or contemplated for the site or evidence of a future project in the record, either in the form of building permit applications or within the project description. On December 23, 2021, a second modification request to Tract No. 51669-IND was filed but subsequently terminated on January 18, 2024, at the request of the applicant.

The subject Modification (Tract No. 51669-IND-M3) was filed to amend Condition No. 12 to remove existing restrictions related to use, permissible floor area, and parking for Lot Nos 1, 3 and 4. Under the original Condition No. 12 of Tract No. 51669-IND, the subject property would be limited to warehousing/manufacturing use with a maximum floor area of 86,969 square feet. With the requested Modification, it would allow for the development of a multi-family residential project or any other use permitted for the zone per the CASP. The conditions of approval as modified, are directly related and limited to boundaries of the tract map modification request. Additionally, the CASP establishes specific street designations and standards that apply to the project site. Sotello Street is designated as a Modified Local Street per the CASP. Condition S-3 (m) has been updated to limit the scope of the improvements to Lot Nos 1, 3 and 4 while ensuring compliance with the CASP street standards. Furthermore, the CASP specifies a street extension to connect the Naud Street section between Sotello and Mesnager (Chapter 3 Street, Page 3-9), leading to the inclusion of additional dedication and improvement conditions that require this future street extension in the Letter of Determination dated October 21, 2024.

However, the CASP is being updated to better support the development of affordable, mixed-income, and permanent supportive housing. Chapter 8 of the CASP Update outlines proposed streetscape improvements for future development, including a potential requirement for a paseo instead of the previously planned street extension along Naud Street between Sotello Street and Mesnager Street. On October 29, 2024, the Los Angeles City Council voted to approve the CASP Update, which is now under form and legality review. On April 9, 2025, Council District 1 submitted a letter to the City Planning Commission and requested the Commission to consider requiring that the project to provide a paseo following the CASP Update. As a result, the revised Conditions of Approval has been updated to reflect that change.

The current CASP, the CASP Update, and associated zoning represents a change in the projected future development of the area that was not anticipated at the time of the approval of the original tract map. As such, the CASP and its specific zoning regulations have made the restrictions of Condition No. 12 of the recorded tract no longer necessary and supports the need for this

modification for Lots 1, 3 and 4.

2. That the modification does not impose any additional burden on the present fee owner of the property.

The modification under the current request is limited to removal of existing restrictions pertaining to permitted uses, permissible floor area, and parking on Lot Nos. 1, 3 and 4 and grants the applicant additional development rights in excess of what was additional entitled as part of the 1994 approval, and therefore does not impose any additional planning or zoning requirements. Through the modification process, the applicant would be able to eliminate floor area restrictions and avail themselves of the Floor Area Bonus available in the CASP. The modification does not result in changes to the number of lots of Tract Map No. 51669-IND. As of March 27, 2024, the applicant notified all the owners of the Tract Map about the proposed tract map modifications via certified mail with a return receipt. Two out of five adjacent owners have signed consent letters regarding the proposed modification and no opposition has been received to date. As such, it can be found that the modification was communicated to and would not impose any additional burden on the present fee owner(s) of the property.

3. That the modifications do not alter any right, title or interest in the real property reflected on the recorded map.

Tract Map No. 51669-IND-M3 is a modification of the original subdivision (Tract No. 51669). The modification of Tract Map 51669-IND would only affect property, title and interest conferred on the applicant as a fee owner by the City's approval of Tract No. 51669 and the recordation of the same by the County Recorder. The property owner of record does not change as a result of the modification and the modification does not result in additional lots to be created as part of this modification request. As such, the modification approved herein does not alter any right, title, or interest in the real property reflected on the recorded Tract Map No. 51669-IND.

4. That the map and conditions as modified conform to the provisions of Government Code Section 66474 and of this Code.

As described in Finding 1, the project site is located within the Central City North Community Plan, one of 35 community plans that comprise the Land Use Element of the General Plan. Additionally, the site is located within the Cornfield Arroyo Seco Specific Plan (CASP) and is zoned UV(CA), or Urban Village, which allows for a mix of uses, including multi-family residential, light manufacturing and assembly, wholesale, commercial office, schools, hotels, entertainment and cultural facilities uses. The existing floor area, use and parking restrictions in Condition No. 12 of Tract Map No. 51669-IND limits the project site to warehouse and manufacturing uses with a maximum Floor Area of 86,969 square feet. Those limitations are more restrictive than the floor area and use provisions permitted for the zone under the CASP. This third modification of recorded final Tract Map No. 51669-IND would make the site-specific restrictions that were imposed as part of the 1994 approval consistent with what is permitted under the later-adopted CASP, including the floor area, use, and parking restrictions of Condition No. 12 for Lots 1, 3 and

4. As a result, the modification would permit development of the site with a project that is in conformance with the adopted CASP and subjects the project to the requirements of the CASP.

The current CASP calls for a street extension with a 60-foot right of way to connect the Naud Street segment between Sotello and Mesnager Streets (CASP, Chapter 3 at p. 3-9.) This extension requires additional dedication and improvement conditions to facilitate its completion. The proposed CASP Update (Council File No. 13-0078-S2) that has not yet taken effect includes replacing the originally planned 60-foot Modified Local Street with a public paseo, emphasizing pedestrian activity over vehicular infrastructure. The CASP Update is currently under form and legality review by the City Attorney's Office and is not yet effective.

Consistent with the CASP Update, the project has been conditioned through revised conditions (Condition No. S-3(p)) to allow for a paseo through an easement along Naud Street in lieu of the street extension through a dedication, as originally mandated in the Advisory Agency's Letter of Determination dated October 29, 2024.

If a building permit application is filed while the current CASP is effective, the project would be subject to the rules and regulations that are in place at the time the plan check fees are paid and plans sufficient for a complete plan check are accepted by the Department of Building and Safety, including the 60-foot dedication and improvement of Naud Street. If this modification to a recorded map allows for the paseo while the current CASP is in effect, any proposed project complying with the paseo requirement would not be in compliance with the CASP. Therefore, a Specific Plan Project Exception would be required. If a building permit application is filed after the effective date of the new CASP, the paseo in this modification to the recorded map approval would be consistent with the new CASP and no Specific Plan Project Exception would be required. By meeting these requirements, the Project will be consistent with the CASP with regard to the CASP's Naud Street requirements.

The conditions of approval of the modification would ensure that the proposed development complies with the development standards from various departments. On November 15, 2023, the applicant applied for a building permit, under application number 23010-10000-04539, to allow the construction of 7-story, 445-unit affordable housing development utilizing CASP floor area incentives at the project site. The proposed Floor Area is approximately 476,764 square feet, and the proposed FAR is 3.41:1. Subsequently, on March 26, 2025, the applicant withdrew the aforementioned building permit with the Department of Building and Safety.

It would also require the project to adhere to the CASP or the CASP Update, incorporate a paseo as an easement along the Naud Street project frontage, and conduct a traffic signal warrant study. As such, the proposed modifications would be consistent with the use and area requirements of the Urban Village zone and would therefore align with the applicable General and Specific Plans.

Additionally, as an existing recorded tract map, the design and improvement of the subdivision has already been reviewed, approved, and implemented. With the exception of the conditions of approval to achieve CASP compliance, the modification has no effect on the design or

improvement of the existing subdivision, which was found to be consistent with applicable General and Specific Plans. The modification would be in conformance with the adopted CASP as well as the CASP Update Chapter 8, Streets, Page 101 (Council File No. 13-0078-S2), the provisions of which take into consideration the suitability of the site with respect to development type, density, environmental impact, public health, and passive or natural heating or cooling. Furthermore, as no changes to the tract or lot lines are requested or proposed, the modification would not conflict with any easements for access through or use of property within the subdivision.

5. That the decision-maker has given consideration, among other factors, to the effects of the modifications on surrounding properties.

The project site and surrounding properties are located within the boundaries of the CASP and were re-designated and re-zoned as part of the adoption of the Specific Plan. The adjoining property to the east is Lot No. 2 of Tract No. 51669-IND, zoned Urban Village, and is currently being developed into a new 285-unit mixed-use housing and commercial development, reviewed under Administrative Clearance (ADM-2021-8129-CASP), with a total Floor Area of 225,745 square feet and an FAR of 3.39:1. The adjoining properties to the south are Lots Nos. 5 and 8 of Tract No. 51669-IND, zoned Urban Innovation, and developed with surface parking lots and industrial warehousing and distribution buildings. The adjoining property to the west is zoned UV(CA) and developed with manufacturing uses. The property to the north of the subject site, across North Spring Street, is the Los Angeles State Historic Park and is zoned GW(CA) for open space. The adjoining property to the north of the site, on the south side of North Spring Street, is an unnumbered lot zoned UV(CA) and developed with a billboard.

As noted, the modifications would permit the development of the site with a multi-family residential project, or any other uses permitted in the zone provided that they are in conformance with the adopted CASP. When it was adopted in 2013, the CASP amended the zoning and land use designations of a 65-acre area northeast of Downtown Los Angeles, comprised primarily of industrial uses, to support new commercial and residential developments within the Specific Plan. The Specific Plan involved an extensive public outreach process, and its effects were studied in the environmental impact report certified by the Los Angeles City Council (EIR No. ENV-2009-599-EIR).

The Applicant is requesting approval of this Tract Map Modification to eliminate floor area, use and parking restrictions to allow future development that would be in line with the CASP regulations. Future development will be reviewed separately under administrative clearance for compliance with the CASP. As such, it can be found that the modifications will not result in detrimental effects on surrounding properties, which are subject to many of the same provisions under the CASP as the subject site.



LOS ANGELES CITY PLANNING APPEAL FILING PROCEDURES

Entitlement and CEQA appeals may be filed using either the Online Application System (OAS) or in person Drop Off at DSC (Development Services Center).

Online Application System: The OAS (<https://planning.lacity.org/oas>) allows appeals to be submitted entirely electronically online; fee payment is by credit card or e-check.

Drop off at DSC: Appeals of this determination can be submitted in person at the Metro or Van Nuys DSC locations, and payment can be made by credit card or check. City Planning has established drop-off areas at the DSCs with physical boxes where appellants can drop off appeal applications; alternatively, appeal applications can be filed with staff at DSC public counters. Appeal applications must be on the prescribed forms, and accompanied by the required fee and a copy of the determination letter. Appeal applications shall be received by the DSC public counter and paid for on or before the above date or the appeal will not be accepted.

Forms are available online at <http://planning.lacity.org/development-services/forms>. Public offices are located at:

Metro DSC

(213) 482-7077
201 N. Figueroa Street
Los Angeles, CA 90012

Van Nuys DSC

(818) 374-5050
6262 Van Nuys Boulevard
Van Nuys, CA 91401

West Los Angeles DSC

(CURRENTLY CLOSED)
(310) 231-2901
1828 Sawtelle Boulevard
West Los Angeles, CA 90025

City Planning staff may follow up with the appellant via email and/or phone if there are any questions or missing materials in the appeal submission, to ensure that the appeal package is complete and meets the applicable Los Angeles Municipal Code provisions.

An appeal application must be submitted and paid for before 4:30 PM (PST) on the final day to appeal the determination. Should the final day fall on a weekend or legal City holiday, the time for filing an appeal shall be extended to 4:30 PM (PST) on the next succeeding working day. Appeals should be filed early to ensure that DSC staff members have adequate time to review and accept the documents, and to allow appellants time to submit payment.



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Appeal Filing



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