

Communication from Public

Name: Sarah Wolfson Golden

Date Submitted: 11/16/2025 01:49 PM

Council File No: 25-1186

Comments for Public Posting: Please see attached, submitted on behalf of the Applicant.

ROSENHEIM & ASSOCIATES, INC.

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November 16, 2025

Chair Bob Blumenfield and Honorable Members of
the Planning and Land Use Management Committee
Los Angeles City Council
200 N. Spring Street, Room 395
Los Angeles, CA 90012

SENT BY EMAIL: clerk.plumcommittee@lacity.org

RE: 6464 Canoga Avenue, Woodland Hills, CA 91367
CASE No.-CPC-2023-8233-DB-SPP-VHCA; ENV-2008-3417-EIR

Dear Chair Blumenfield and Honorable Committee Members:

On behalf our client, TB Canoga, LLC (“Applicant”), I would like to thank the Los Angeles City Planning staff for their excellent and diligent work on Case No. CPC-2023-8233-DB-SPP-VHCA. We have closely reviewed the proposed Conditions of Approval and are pleased to see that Approval has been recommended for the 276 dwelling unit Density Bonus Project, which will include 21 units restricted affordable to Very Low-Income Households. This will be one of the first mixed-income Projects in Warner Center and truly embodies the goals and objectives of the Warner Center 2035 Plan (“WC 2035 Plan”). The Project activates the street frontage with public serving ground floor uses and creates residential opportunities in close proximity to the Metro G Line.

I am writing to request technical corrections and clarifications to three proposed Conditions of Approval in order to align the conditions with the Project’s proposed density and the requirements of City and State law. The requested revisions are explained and justified below; where we are requesting text be stricken, it appears as ~~strikethrough~~ text and where we are proposing that text be added, it has been underlined. Please also see Exhibit A: Requested Condition Language, which provides a clean version of the requested revised condition language without strikethrough or underlined changes, for ease of reference.

Condition of Approval No. 2

“Residential Density. The project shall be limited to a maximum density of 2746 residential dwelling units, including On-Site Restricted Affordable Units.”

Applicant Comments: This revision corrects a typographical error, the Project proposes 276 dwelling units, as demonstrated by the Exhibit A plans and throughout the remainder of the Staff Report.

Condition of Approval No. 14

“Street Standards- Improvements and Dedications. Canoga Avenue is dedicated as a Major Highway Class II and shall be in compliance with Table 1 of the Specific Plan, except as limited by Assembly Bill 3177 as shown on “Exhibit B” which requires on the east side of Canoga Avenue a 57-foot half right-of-way, a 45-foot half roadway, results in an eight-foot half sidewalk, an eight-foot half parkway, and a four-foot half easement on the east side of Canoga Avenue.

Victory Boulevard is dedicated as a Major Highway Class I and shall be in compliance with Table 2 of the Specific Plan, except as limited by Assembly Bill 3177, which requires on the south side of Victory Boulevard a 68-foot half right-of-way, a 56-foot half roadway, results in an eight-foot half sidewalk, a 16-foot half parkway, and a 12-foot half easement on the south side of Victory Boulevard.

Street Name	District	Side of Street	North Boundary	South Boundary	Standard Dimensions					Street Designation
					1/2 sidewalk	1/2 parkway	1/2 roadway	1/2 R.O.W.	1/2 easement	
Canoga Ave.	Downtown	East	Victory Bl.	~350' South of Victory Bl.	8'	8'	45'	57'	4'	Major Highway Class II

Street Name	District	Side of Street	West Boundary	East Boundary	Standard Dimensions					Street Designation
					1/2 sidewalk	1/2 parkway	1/2 roadway	1/2 R.O.W.	1/2 easement	
Victory Bl.	Downtown College	South	Canoga Ave.	De Soto Ave.	8'	16'	56'	68'	12'	Major Highway Class I

The Project shall be required to provide sidewalks and parkways consistent with ~~comply with the street standards of Table 1 and Table 2 of the Warner Center 2035 Specific Plan to the satisfaction of the Bureau of Engineering. No dedication or improvement shall be required for Roadway widening (DOT/BOE/DCP)”~~

Applicant Comments: As drafted, this condition would require both sidewalk and roadway widening dedications and improvements along both Canoga Avenue and Victory Boulevard. Effective January 1, 2025, Assembly Bill 3177 amended California Government Code Section 66005.1(c)(1) to read “A local agency shall not impose a land dedication requirement on a housing development pursuant to Section 66001 to widen a roadway if the land dedication requirement is for the purpose of mitigating vehicular traffic impacts, achieving an adopted traffic level of service related to vehicular traffic, or achieving a desired roadway width.” AB 3177 generally applies to all housing development projects with certain limited exceptions; one such exception is for housing development projects located further than ½ mile from a Major Transit Stop and with more than 500 feet of street frontage (Government Code Section 66005.1(c)(2)(A)). The Subject Property is located within ½ mile of a Major Transit Stop, as identified on ZIMAS, and therefore is not subject to this exemption. Another exception to AB 3177 would require the City to make a finding, supported by substantial evidence, that a land dedication requirement is necessary to preserve the health, safety, and welfare of the public, including pedestrians, cyclists, and children (Government Code Section 66005.1(c)(2)(B)); however, no such finding has been made by the City. A third exception to AB 3177 applies if a land

dedication requirement is being imposed to construct public improvements such as sidewalk and sewer improvements (Government Code Section 66005.1(c)(2)(C)); under the proposed revised condition language, the Project will continue to provide parkway and sidewalk improvements consistent with the WC 2035 Plan standards. Accordingly, we respectfully request that in light of the applicability of AB 3177 to the Project, which our office previously advised the City of on August 13, 2025, Condition of Approval No. 14 be revised as proposed to clarify that roadway dedications and improvements shall not be required for the Project.

Condition of Approval No. 16

“Front Setback. ~~The Project shall provide a minimum front setback of 12 feet and a maximum front setback of 15 feet along Victory Boulevard.~~ Along Canoga Avenue, the Project shall have a 47 -foot front yard setback, consistent with the Waiver of Development Standards granted herein.”

Applicant Comments: As drafted, this condition would require the Project to provide two separate front yard setbacks (one along Victory Boulevard and one along Canoga Avenue). This is not consistent with the Project’s Exhibit A plans, which identify a single front yard setback along Canoga Avenue. The Exhibit A plans received Preliminary Zoning Assessment (“PZA”) approval on June 11, 2024 from the Los Angeles Department of Building and Safety (“LADBS”); the LADBS signed and stamped PZA plans clearly identify the Victory Boulevard setback as a side yard, not subject to the front setback requirements of the WC 2035 Plan. Via issuance of the June 11, 2024 PZA approval, LADBS (and by extension, the City) determined that the Project was consistent with all applicable objective zoning and development standards, including all such applicable setback standards under the LAMC and WC 2035 Plan. As such, pursuant to the Housing Accountability Act (Government Code Section 65589.5), the City may not now subsequently assert that compliance with a newly identified development standard is required.

Furthermore, treating the Subject Property as having a single front yard setback along Canoga Avenue is fully consistent with the City’s zoning regulations. Neither the WC 2035 Plan, nor the LAMC define “setback” or “front setback.” Additionally, per Section 4 of the WC 2035 Plan “Words or phrases not defined in this Section 4, or elsewhere in this Plan shall be construed as defined in the LAMC.” As such, it is appropriate to look to the LAMC’s definitions of “front lot line” and “front yard” to guide yard and setback designations in Warner Center.

For corner lots, Section 12.03 of the LAMC defines the Front Lot Line as “a line separating the narrowest street frontage of the lot from the street, except in those cases where the latest tract deed restrictions specify another line as the front lot line.” In this case, the property is a corner lot, Canoga Avenue is the shortest frontage, and there are no tract deed restrictions. Consequently, Canoga Avenue is the front lot line, while Victory Boulevard and the

southern lot line are side yards, and the eastern lot line is the rear yard. As mentioned above, the PZA confirms these yard designations.

Additionally, Section 12.03 LAMC defines a yard as “an open space other than a court, on a lot, unoccupied and unobstructed from the ground upward, except as otherwise provided in this article.” The setback requirements, as imposed by the WC 2035 Plan require that Projects provide setbacks with landscape that are free of structures within the setback area, and are akin to and consistent with the definition of “Yard” in the LAMC. Furthermore, Front Yard is defined in the LAMC as “A yard extending across the full width of a lot, the depth of which is the minimum horizontal distance between the front lot line and a line parallel thereto on the lot.”

Consequently, standard practice and the applicable definitions of the LAMC, confirm Canoga Avenue as the front lot line, which would be subject to the front setback requirements of the Plan. To subject a side yard (in this case Victory Boulevard) to the front setback requirements would be incongruous with the WC 2035 Plan, the LAMC and the conclusions of the PZA review process.

Page F-7 of the Findings in the Staff Report indicate that the justification for requiring a front setback along the Victory side yard is that Victory Boulevard is an Active Street Frontage. However, Active Street Frontages do not trigger setback requirements. WC 2035 Plan Section 6.1.3.9 speaks only to front setbacks in the Downtown District (the applicable District for the Project), requiring that “All Projects shall observe a front setback area of no less than 12 feet and no more than 15 feet. Any project not located on an Active Street Frontage shall be permitted a front setback of up to 20 feet.” The WC 2035 Plan does not include a requirement for Active Street Frontages to have a setback, rather, where a front setback is in an Active Street Frontage, the front setback, here Canoga Avenue, as set forth above, has a maximum setback of 15 feet. Furthermore, Section 6.2.4 of the WC 2035 Plan provides the standards for Active Street Frontages which are noticeably silent on setbacks. If it was the intent of the Plan to require setbacks for Active Street Frontages, Section 6.2.4 would have included such language, but it does not. Consequently, district standards which apply only to front setbacks shall apply here, to the front setback, which, as described above is Canoga Avenue.

Thank you very much for your consideration of the above requested deletions, and additions to Condition Nos. 2, 14, and 16. Please do not hesitate to contact either Brad Rosenheim (brad@raa-inc.com) or Sarah Golden (sarahg@raa-inc.com) to discuss the above requests further or to seek further clarification.

Sincerely,

Sarah Wolfson Golden

Sarah Wolfson Golden

Rosenheim & Associates, Inc.

Exhibit A: Requested Condition Language

Condition of Approval No. 2

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Condition of Approval No. 14

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Victory Bl.	Downtown College	South	Canoga Ave.	De Soto Ave.	8'	16'	56'	68'	12'	Major Highway Class I

The Project shall be required to provide sidewalks and parkways consistent with Table 1 and Table 2 of the Warner Center 2035 Specific Plan. No dedication or improvement shall be required for Roadway widening **(DOT/BOE/DCP)**”

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