

## Communication from Public

**Name:** Todd Nelson

**Date Submitted:** 12/01/2025 10:58 AM

**Council File No:** 25-1186

**Comments for Public Posting:** On behalf of the applicant for the 6464 Canoga project, which the City Council will consider at its December 2, 2025 meeting, attached please find a letter for submittal to Council File 25-1186.



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December 1, 2025

**VIA EMAIL**

President Marqueece Harris-Dawson and Honorable  
Councilmembers  
Los Angeles City Council  
200 N. Spring Street, Room 395  
Los Angeles, CA 90012

*clerk.cps@lacity.org*

**Re: 6464 Canoga Project, Response to November 17, 2025 WSRCC Letter  
Council File No. 25-1186, December 2, 2025 Council Meeting, Item No. 16**

Dear President Harris-Dawson and Honorable Councilmembers:

On behalf of TB Canoga LLC, the applicant for the mixed-use mixed-income 6464 Canoga housing development project ("Project") that the City Council will consider at its December 2, 2025 meeting, we are submitting responses to a November 17, 2025 comment letter submitted to the City by the Mitchell M. Tsai Law Firm on behalf of the Western States Regional Council of Carpenters ("WSRCC"). WSRCC's latest letter repeats various objections to the Project originally made in a prior letter dated October 22, 2025; on November 14, 2025, this firm submitted a letter to Council File No. 25-1186 demonstrating that WSRCC's earlier comments did not identify any deficiency in the City's review and processing of the Project's requested entitlements or its proposed environmental clearance pursuant to the California Environmental Quality Act ("CEQA").

WSRCC's latest letter adds two additional objections – first, they claim that the Project's CEQA clearance (i.e., the City's determination that the Project's potential to result in environmental impacts is fully within the scope of the certified program environmental impact report ["EIR"] prepared for the Warner Center 2035 Specific Plan ["Specific Plan"]) fails to properly assess the potential historical significance of a former Rocketdyne building that will be demolished in connection with the Project. WSRCC's sole basis for this objection is the fact that the existing building is included in the City's 2013 SurveyLA historic resources survey performed for the Canoga Park – Winnetka – Woodland Hills – West Hills Community Plan area ("2013 Survey"). However, the 2013 Survey does not conclude that the existing building is historic, and assigns an evaluation code of "QQQ" to the building, representing a property that "requires additional research to evaluate or that cannot be evaluated due to limited or no visibility." Regarding the Project site specifically, the 2013 Survey states: "More research is needed to determine if this building is significant for its association

with Rocketdyne, relative to the overall development of their industrial facilities.”<sup>1</sup> WSRCC directly quotes this same language from the 2013 Survey in their latest letter, indicating their awareness that more research is called for.

Consistent with the 2013 Survey’s directive, in 2018, a site-specific historic resources evaluation was prepared by Kaplan Chen Kaplan, which concluded that the existing building was not individually eligible for listing in the National Register of Historic Places, the California Register of Historic Places, or as a City of Los Angeles Historic-Cultural Monument due to a lack of historic associations with people or events or lack of architectural significance, nor was the building a contributor to any eligible historic district.<sup>2</sup> Then, in 2023, Architectural Resources Group prepared another site-specific historic resources evaluation of the building, including conducting new primary and secondary source research and a site visit. This 2023 evaluation reached the same conclusions – the existing building is not eligible as a historic resource for the purposes of CEQA.<sup>3</sup> Both the 2018 and 2023 site-specific historic evaluations are appended to the Project’s CEQA clearance documentation, which the City has reviewed and approved, and which is available in the Council File for the Project. Therefore, WSRCC’s claim that the Project site’s existing building is a potential historical resource is not supported by the substantial evidence in the record demonstrating otherwise.

WSRCC’s second new objection claims that the City is failing to “implement additional labor standards, local hire, prevailing wage, mobility fee and affordable housing requirements” for projects located within the Specific Plan. WSRCC claims that the City has approved these requirements but is now ignoring them; to support this claim, WSRCC merely cites several Council Files that are associated with the City’s most recent legislative process to adopt the current Specific Plan, but does not identify specific ordinances or other official City Council actions demonstrating approval of any such requirements. This is because no such additional ordinances or actions exist – the currently adopted Specific Plan and its related City Council-approved ordinances reflect the City’s full legislative expression of what is currently required under the Specific Plan. WSRCC’s claims that there should be other, additional requirements that should be applied to the Project is not borne out by the administrative record, and have no merit.

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<sup>1</sup> City of Los Angeles, SurveyLA, Canoga Park – Winnetka – Woodland Hills – West Hills Individual Resources, 3/12/2013, p. 4 of 57, available at: [https://planning.lacity.gov/odocument/2b0d36ee-2421-4cb5-b01e-09ac9d5c7bc8/Canoga\\_Park\\_Individual\\_Resources.pdf](https://planning.lacity.gov/odocument/2b0d36ee-2421-4cb5-b01e-09ac9d5c7bc8/Canoga_Park_Individual_Resources.pdf).

<sup>2</sup> Kaplan Chen Kaplan, 6464 Canoga Avenue, Los Angeles, California, Historic Resource Evaluation, October 20, 2018, available at: [https://cityclerk.lacity.org/online/docs/2025/25-1186\\_misc\\_2\\_11-06-2025.pdf](https://cityclerk.lacity.org/online/docs/2025/25-1186_misc_2_11-06-2025.pdf).

<sup>3</sup> Architectural Resources Group, 6464 Canoga Avenue Historical Resource Assessment, June 7, 2023, available at: [https://cityclerk.lacity.org/online/docs/2025/25-1186\\_misc\\_2\\_11-06-2025.pdf](https://cityclerk.lacity.org/online/docs/2025/25-1186_misc_2_11-06-2025.pdf).

President Harris-Dawson and Honorable Councilmembers

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In summary, and once again, the comments made by WSRCC do not constitute substantial evidence of any issue or flaw in the City's review of the Project, and we respectfully request that the City Council approve the Project. Thank you for your consideration.

Sincerely,



Todd Nelson

Partner

of RAND PASTER & NELSON, LLP

cc: Sheila Toni, Department of City Planning  
Brad Rosenheim, Rosenheim & Associates  
Sarah Golden, Rosenheim & Associates