

May 23, 2025

**VIA ELECTRONIC UPLOAD**

Central Los Angeles Area Planning Commission  
Los Angeles City Hall  
10<sup>th</sup> Floor, Room 1010  
200 North Spring Street  
Los Angeles, CA 90012

Re: Appeal of Case Nos. TT-84566-CC and ENV-2024-3793-CE  
1451 South Hi Point Street

Dear Commission President Lawrence, Vice-President Kang, and Commission Members:

Our office represents 1459 Hi Point, LLC (“Appellant”), which owns the real property located at 1459 South Hi Point Street within the City of Los Angeles (the “City”). Through this letter, Appellant appeals the condominium conversion at 1451 South Hi Point Street (the “Project”) (Case No. TT-84566-CC) and the Project’s related Class 32 Categorical Exemption (Case No. ENV-2024-3793-CE) (the “CEQA Exemption”).

Specifically, the approval of the Project is based on the vacancy rate being 6.88%. However, the data used to support this factor is outdated and improper. Since the actual vacancy rate is less than 5%, the Project must be denied.

Additionally, the Project violates the City’s Just Cause for Eviction Ordinance (the “JCEO”), since it requires the eviction of tenants, yet the JCEO does not allow evictions for condominium conversions.

Lastly, the Class 32 Categorical Exemption is not proper since unusual circumstances exist, namely the displacement of tenants during a housing crises.

The Project abuts Appellant’s property, and therefore Appellant is aggrieved by the Project approval.

Los Angeles City Planning Commission  
May 23, 2025  
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Very truly yours,

A handwritten signature in blue ink, consisting of a stylized, elongated cursive mark that starts with a small loop and ends with a long, sweeping horizontal stroke.

ERNEST J. GUADIANA  
Elkins Kalt Weintraub Reuben Gartside LLP

EJG:ejg

## 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:** TT-84566-CC

**APN:** 5068-012-034

**Project Address:** 1451 South Hi Point Street

**Final Date to Appeal:** May 30, 2025

## 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:** Ilan Douek

**Company/Organization:** 1459 Hi Point LLC

**Mailing Address:** 5168 West Pico Boulevard

**City:** Los Angeles **State:** CA **Zip Code:** 90019

**Telephone:** 323-454-2241 **E-mail:** ilan@drexelconstruction.com

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:** Ernest J. Guadiana

**Company/Organization:** Elkins Kalt Weintraub Reuben Gartside LLP

**Mailing Address:** 10345 W. Olympic Blvd

**City:** Los Angeles **State:** CA **Zip Code:** 90064

**Telephone:** 310-746-4425 **E-mail:** eguadiana@elkinskalt.com

## 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:**

Signed by:  
  
 16CE89D0F4C4FB...

**Date:** 5/23/2025 | 1:27 PM PDT

## 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:** \_\_\_\_\_

**Reviewed & Accepted by (DSC Planner):** \_\_\_\_\_

**Receipt No.:** \_\_\_\_\_ **Date:** \_\_\_\_\_

☐ 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 COMMUNITES (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.

**Applicant Copy**

Office: Downtown

Application Invoice No: 102799



\*68001102799\*

City of Los Angeles  
Department of City Planning**City Planning Request**

NOTICE: The staff of the Planning Department will analyze your request and accord the same full and impartial consideration to your application, regardless of whether or not you obtain the services of anyone to represent you.

This filing fee is required by Chapter 1, Article 9, L.A.M.C.

If you have questions about this invoice, please contact the planner assigned to this case. To identify the assigned planner, please the assigned planner, please visit <https://planning.lacity.gov/pdiscaseinfo/> and enter the Case Number.

**Payment Info: \$211.56 was paid on 05/23/2025 with receipt number 200259007974**

Applicant: Ilan Douek (1459 Hi Point LLC)
Representative:
Project Address: 1451 S HI POINT ST 1-8, 90035

NOTES:
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TT-84566-CC-1A			
Item	Fee	%	Charged Fee
Appeal by Person Other Than The Applicant	\$172.00	100 %	\$172.00
<b>Case Total</b>			<b>\$172.00</b>
* Fees Subject to Surcharges			\$172.00
Fees Not Subject to Surcharges			\$0.00
Plan & Land Use Fees Total			\$0.00
Expediting Fee			\$0.00
Development Services Center Surcharge (3%)			\$5.16
City Planning Systems Development Surcharge (6%)			\$10.32
Operating Surcharge (7%)			\$12.04
General Plan Maintenance Surcharge (7%)			\$12.04

* Fees Subject to Surcharges	\$172.00
Fees Not Subject to Surcharges	\$0.00
Plan & Land Use Fees Total	\$0.00
Expediting Fee	\$0.00
Development Services Center Surcharge (3%)	\$5.16
City Planning Systems Dev. Surcharge (6%)	\$10.32
Operating Surcharge (7%)	\$12.04
General Plan Maintenance Surcharge (7%)	\$12.04
Grand Total	\$211.56
Total Overpayment Amount	\$211.56
Total Paid (amount must equal sum of all checks)	\$423.12

Council District:

Plan Area:

Processed by JASON CHAN on 5/23/2025

Signature: \_\_\_\_\_