

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: CPC-2021-9522-DB-VCU-CU-SPR-HCA / ENV-2021-9523-HES-PEIR

APN: 7411-019-016

Project Address: ~~-1268 — 1290 West Pacific Coast Highway; 25900 South Frampton Avenue~~

Final Date to Appeal: December 1, 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: Supporters Alliance for Environmental Responsibility (SAFER)

Company/Organization: Lozeau Drury LLP on behalf of SAFER

Mailing Address: 1123 Park View Drive, Suite 300

City: Covina State: CA Zip Code: 91724

Telephone: 510-836-4200 E-mail: richard@lozeaudrury.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: Victoria Yundt

Company/Organization: Lozeau Drury LLP

Mailing Address: 1939 Harrison Street, Suite 150

City: Oakland State: CA Zip Code: 94612

Telephone: 510-836-4200 E-mail: victoria@lozeaudrury.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: Site Plan Review and all remaining entitlements

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:  Date: 11/20/2025

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: \$178

Reviewed & Accepted by (DSC Planner): Ruben Vasquez

Receipt No.: 200353361670 Date: 11/26/25

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.

Justification/Reason for Appeal

1268-1290 West Pacific Coast Highway

CPC-2021-9522-DB-VCU-CU-SPR-HCA / ENV-2021-9523-HES-PEIR

I. REASON FOR THE APPEAL

The decision to rely on the previously Certified 2021-2029 Housing Element Environmental Impact Report (“EIR”) for the 1268-1290 West Pacific Coast Highway Project (CPC-2021-9522-DB-VCU-CU-SPR-HCA / ENV-2021-9523-HES-PEIR) (“Project”) fails to comply with the California Environmental Quality Act (“CEQA”). There are significant project-specific environmental impacts that are not covered in the EIR. CEQA requires for these project-specific environmental impacts to be addressed. Therefore, the City of Los Angeles (“City”) must prepare and circulate a project-specific EIR prior to considering approvals for the Project.

II. SPECIFICALLY THE POINTS AT ISSUE

For the specific reasons set forth in the attached comment letter dated September 2, 2025, the Project’s environmental review cannot be consolidated into the previously certified 2021-2029 Housing Element EIR. Furthermore, proper CEQA review must be complete *before* the City approves the Project’s entitlements. (*Orinda Ass’n. v. Bd. of Supervisors* (1986) 182 Cal.App.3d 1145, 1171 [“No agency may approve a project subject to CEQA until the entire CEQA process is completed and the overall project is lawfully approved.”].) As such, the City Planning Commission’s approval of the City’s environmental review determination for the Project was in error.

III. HOW YOU ARE AGGRIEVED BY THE DECISION

Members of appellant Supporters Alliance for Environmental Responsibility (“SAFER”) live and/or work in the vicinity of the proposed Project. They breathe the air, suffer traffic congestion, and will suffer other environmental impacts of the Project unless it is properly mitigated.

IV. WHY YOU BELIEVE THE DECISION-MAKER ERRED OR ABUSED THEIR DISCRETION

The City Planning Commission’s October 9, 2025 approval of the project’s environmental review determination was made in error. Instead of determining that the project’s environmental review falls under the previously certified 2021-2029 Housing Element EIR, the City should have instead prepared and circulated a project-specific EIR prior to approving the project. Preparing and circulating a project-specific EIR would examine the significant environmental impacts associated with the Project that were not addressed in the 2021-2029 Housing Element EIR.



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September 2, 2025

VIA EMAIL

Norali Martinez, City Planner
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Vince P. Bertoni, AICP, Director
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Holly L. Wolcott, City Clerk
Office of the City Clerk
City of Los Angeles
200 N. Spring Street, Room 360
Los Angeles, CA 90012
cityclerk@lacity.org

Re: Comment on Exemption to the California Environmental Quality Act (“CEQA”) Due to Previous Certification of the 2021-2029 Housing Element Environmental Impact Report (No. ENV-2020-6762-EIR; SCH No. 2021010130) (“EIR”), Addendum No. ENV-2020-6762-EIR-ADD1 and Addendum No. ENV-2020-6762-EIR-ADD for the 1280 Pacific Coast Highway Project (CPC-2021-9522-DB-VCU-CU-SPR-HCA)

Dear Ms. Martinez, Mr. Bertoni, and Ms. Wolcott:

This comment is submitted on behalf of Supporters Alliance for Environmental Responsibility (“SAFER”), regarding the project known as 1280 Pacific Coast Highway (CPC-2021-9522-DB-VCU-CU-SPR-HCA), which proposes the development of a six-story, 354-unit, 406,855 square-foot mixed-use building with a six-story above-grade parking garage located at 1268-1290 Pacific Coast Highway and 25900 S. Frampton Avenue in the City of Los Angeles (“Project”).

SAFER objects to the City’s decision to exempt the Project from environmental review under the California Environmental Quality Act (“CEQA”) based on a previous certification of the 2021-2029 Housing Element Environmental Impact Report (No. ENV-2020-6762-EIR; SCH No. 2021010130) (“EIR”) and Addendum No. ENV-2020-6762-EIR-ADD1, adopted on June 14, 2022 and Addendum No. ENV-2020-6762-EIR-ADD, adopted on December 10, 2024. Exempting the Project from CEQA based on the certification of the previous EIR violates CEQA because the EIR does not analyze or address project-specific environmental impacts. SAFER

September 2, 2025
Comment on 1280 Pacific Coast Highway Project
(CPC-2021-9522-DB-VCU-CU-SPR-HCA)
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requests that an initial study be conducted and a CEQA document prepared to analyze and mitigate the Project's environmental impacts. The Hearing Officer should decline to approve the Project until proper CEQA review is completed.

Sincerely,

A handwritten signature in cursive script that reads "Victoria Yundt". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Victoria Yundt
Lozeau Drury LLP