

Via Email clerk.plumcommittee@lacity.org
City of Los Angeles
Office of the City Clerk
Attn: Candy Rosales, Legislative Assistant

ENV-2023-2927-CE-1A
Council File 26-0411

PLUM Committee Hearing 5/12/26

Letter from Appellants
Project Address: 23139 and 23141 W. Collins Street

May 4, 2026

To the Members of the PLUM Committee:

We want to first of all thank you for listening to what we have to say regarding our CEQA appeal, ENV-2023-2927-CE-1A, Council File 2611-0411.

Everything you need to know to support our appeal is detailed in the letter (2/2/2026) prepared by Amy Minter of Carstens, Black & Minter, specifically page 1, and pages 4 through 6.

We are asking you to vote in favor of our appeal as the City acted erroneously in granting the applicant a Class 32 exemption. This project was not exempt in that it does not meet all 5 conditions required to qualify for such an exemption.

This property does not conform to the General Plan, in conjunction with its Community Plan, with its land use provision for horsekeeping that will be eliminated as a result of this project. If a property does not conform to the General Plan, a Class 32 exemption cannot be granted.

This property does not conform to the RA-1 zoning regulations. Since there was a concurrent case, ZA-2023-2926-ZAA-HCA, asking for an exception to the RA-1 zoning regulation which mandates a 70-foot midpoint, the project clearly does not comply with zoning regulations and a Class 32 exemption should have been automatically denied. If a project does not conform to the zoning regulations, a Class 32 exemption cannot be granted.

Furthermore, consideration is to be given to the subsequent impact a Class 32 exemption provides. The AA Case AA-2023-2925-PMLA-HCA granted a split into 2 lots but it was contingent on approval of the ZA case, which violated the RA-1 zoning code. When the Class 32 exemption request was submitted, it should have automatically been rejected due to the nature of the AA case with its contingent ZA case.

In the 2/12/26 hearing, we raised the issue regarding other similarly configured properties following suit, and that the City would have no recourse to deny similar applications. Since they too would be lot splits that do not conform to the General/Community plan or zoning regulations, they too would not qualify for a Class 32 exemption. Yet the City would be hard-pressed to deny those Class 32 exemptions as developers would cite this current CEQA case as precedent.

Since the project is not consistent with the General and Community plans as well as the zoning regulations, both cumulatively considerable and significant environmental impacts must be considered.

This lot split approval gives way for a developer to potentially build 20 units on this less than one acre lot, as per SB 1123. The applicant's representative referenced this in the February hearing, and the applicant has since claimed that they may seek to build multiple units under SB 1123. This may also be why the applicant did not seek a lot split through SB 9, which would have prevented development pursuant to SB 1123.

As two lots, a developer may be eligible to build 20 homes; as one lot, the maximum is reduced to 10.

The case as it currently was submitted to the City, can and should have received environmental review when it was initially proposed, due to not conforming to the General/Community Plans and its violation of the zoning code.

The City did not do its duty in considering impacts from its decision to grant this exemption.

The applicant's following prior actions demonstrate a need at the very minimum for clear conditions for development of this site:

1. filed a lawsuit in 2025 against an elderly neighbor to release a legally-held deed restricting division of the property in perpetuity
2. has not properly maintained the property

3. did not put in safety or security measures or clear debris following squatters' attempt to occupy the house (11/4/2025)
4. started demolition (12/22/25) with an outdated permit issued in October 2023
5. the arborist report added to the AA case file on 2/10/2026 is outdated as it was done in October 2023 (The arborist report is an extensive report that includes environmental impacts.)

We do not know what the applicant's plans are and as such, the best route to take is to proceed with caution, and protect not only the project's property but all surrounding properties to make sure potential environmental impacts are eliminated or at least mitigated. The plan submitted in the case file is to build a 5013 square foot house with accessory buildings and leave the back lot vacant. These plans were withdrawn on 11/13/25. While they may not be beholden to adhering to any building plans, we want to make sure you do not use those outdated plans to impact your decision. The City has been incorporating this old information into its hearing notices, including the notice for the 5/12/26 hearing for this case. This is misleading to not only the Council, but to the entire community of Walnut Acres.

The original request by the applicant was to get an exception to the zoning rules. This CEQA exemption is a further "exception" they asked for and were given. We want to make sure whatever they or anyone else builds, is done responsibly with consideration of following CEQA guidelines.

Since the City wrongly relied on a Class 32 exemption for this project, we are asking the PLUM Committee to recommend to Council to uphold the appeal. This violation is crystal clear and it is why we filed the appeal.

We ask the PLUM Committee to recommend to Council that the following conditions be added to the approvals for this project:

1. Condition the applicant to not disturb or destroy any vegetation of any of the adjacent properties due to grading, construction or any other project impacts.
2. Condition the applicant to not remove any portion of any trees/bushes that are shared or appear to be shared by any of the adjacent properties, or to encroach upon those properties in any way.
3. Condition the applicant to preserve the integrity of 23131 Collins Street's western fence, which runs from the front of the property to the back gate. Removing it would disturb vegetation. It was originally installed to ensure privacy.

4. Condition the applicant to retain the 3 protected trees of 23139/23141 W. Collins Street:

- a. California Western Sycamore
- b. California Black Walnut
- c. Valley Oak

5. Condition the applicant to ensure the most up-to-date arborist report is included in the City's files.

5.a. Condition the applicant to adhere to the strictest recommendations in the arborist report to protect the integrity and survival of the property's trees as well as those of neighboring properties.

6. Condition the applicant to submit an up-to-date soils report if deemed necessary as per building plans currently submitted.

7. Condition the applicant to adhere to building on Parcel A only and leave Parcel B vacant, as per related AA and ZA case files citing such and as contained in all hearing notices issued by City Planning, for a set period.

8. Condition the applicant to not further subdivide the property into more than the approved 2 lots, Parcel A and Parcel B.

9. Condition the applicant to comply with all conditions of the AA and ZA cases as outlined in their respective Letters of Determination, and for all conditions imposed by the City as part of this appeal proceeding.

We want the applicant, just as we do, to abide by the rules, regulations, and/or laws of the City of Los Angeles, and we anticipate the PLUM Committee and City Council will ensure this.

We thank you for your time and careful consideration of our appeal.

Sincerely,

Susan Prestine and David Lowery