



Public Comments Not Uploaded FW: Justification for CEQA Appeal; 23717 West Victory Boulevard; Case Nos.: ENV-2024-5223-CE; ZA-2024-5222-CU2-ZBA-1A ("Project")

1 message

paralegal@channellawgroup.com <paralegal@channellawgroup.com>

Wed, Apr 15, 2026 at 2:24 PM

Reply-To: clerk.plumcommittee@lacity.org

To: clerk.plumcommittee@lacity.org

Cc: Jamie Hall <jamie.hall@channellawgroup.com>, Veronica Lebron <accounting@channellawgroup.com>, Hannah Simon <admin@channellawgroup.com>

Good afternoon:

Our office noted that the Justification for CEQA Appeal letter, dated March 24, 2026, is missing from the Record. The City Clerk suggested that we send the letter to you ensure it is uploaded to Council File 26-0497.

Please confirm receipt of this email and the attachment.

Thank you.

Shannon Harkins

Paralegal

Channel Law Group, LLP

[8383 Wilshire Blvd., Suite 750](#)

[Beverly Hills, CA 90211](#)

Office Number: (310) 347-0050

Direct Number: (310) 845-6252

Fax: (323) 723-3960

paralegal@channellawgroup.com

*****For accounting and invoicing, please contact Veronica Lebron at Accounting@ChannelLawGroup.com*****

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From: City Clerk Council and Public Services <clerk.cps@lacity.org>

Sent: Wednesday, April 15, 2026 2:14 PM

To: paralegal@channellawgroup.com

Cc: stephanie.escobar@lacity.org; Jamie Hall <jamie.hall@channellawgroup.com>; Veronica Lebron <accounting@channellawgroup.com>; Hannah Simon <admin@channellawgroup.com>

Subject: Re: Justification for CEQA Appeal; 23717 West Victory Boulevard; Case Nos.: ENV-2024-5223-CE; ZA-2024-5222-CU2-ZBA-1A ("Project")

Good afternoon,

Thank you for contacting the Office of the City Clerk.

As your inquiry pertains to a Planning and Land Use Management matter, please redirect your correspondence to clerk.plumcommittee@lacity.org.

Thank you,

On Wed, Apr 15, 2026 at 1:44 PM <paralegal@channellawgroup.com> wrote:

Good afternoon:

Our office noted that the Justification for CEQA Appeal letter, dated March 24, 2026, is missing from the Record. We are resending the letter to ensure it is uploaded to Council File 26-0497.

Please confirm receipt of this email and the attachment.

Thank you.

Shannon Harkins

Paralegal

Channel Law Group, LLP

[8383 Wilshire Blvd., Suite 750](#)

[Beverly Hills, CA 90211](#)

Office Number: (310) 347-0050

Direct Number: (310) 845-6252

Fax: (323) 723-3960

paralegal@channellawgroup.com

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at Accounting@ChannelLawGroup.com*****

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 **2026-03-24 FINAL Appeal Justification.pdf**
13970K

Channel Law Group, LLP

8383 Wilshire Blvd.
Suite 750
Beverly Hills, CA 90211

Phone: (310) 347-0050
Fax: (323) 723-3960
www.channellawgroup.com

JULIAN K. QUATTLEBAUM, III
JAMIE T. HALL *
CHARLES J. McLURKIN
GREGORY T. WITTMANN

Writer's Direct Line: (310) 982-1760
jamie.hall@channellawgroup.com

*ALSO Admitted in Texas

March 24, 2026

VIA ELECTRONIC UPLOAD

City Council of the City of Los Angeles
200 N. Spring Street
Los Angeles, CA 90012

Re: Justification for CEQA Appeal; 23717 West Victory Boulevard; Case Nos.: ENV-2024-5223-CE; ZA-2024-5222-CU2-ZBA-1A ("Project")

Dear Members of the Los Angeles City Council:

This firm represents West Valley Alliance for Optimal Living ("Appellant") regarding the proposed development located at 23717 West Victory Boulevard ("Project"). On March 9, 2026, the South Valley Area Planning Commission ("South Valley APC") issued a Letter of Determination ("LOD") denying our client's appeal and sustaining the Zoning Administrator's determination that the Project is categorically exempt from the California Environmental Quality Act ("CEQA").

Pursuant to Public Resources Code Section 21151(c) and applicable City codes, Appellant hereby appeals the South Valley APC's CEQA determination. This letter synthesizes the environmental arguments previously made in our November 5, 2025, February 2, 2026, and February 10, 2026 appeal justification letters to demonstrate that the Project is not exempt from CEQA. True and correct copies of these prior letters are attached hereto as **Exhibit A**, **Exhibit B**, and **Exhibit C**, respectively. Additionally, a copy of the PowerPoint presentation delivered on behalf of Appellant during the South Valley APC hearing is attached as **Exhibit D**, the transcript from the APC hearing is attached as **Exhibit E**, and a supplemental rebuttal letter from our air quality expert, Ray Kapahi, dated March 9, 2026, is attached as **Exhibit F**.

I. The Project is Precluded from Categorical Exemptions (Classes 1, 3, and 5)

The City erroneously asserts that the Project is categorically exempt from CEQA under Guidelines Sections 15301 (Class 1), 15303 (Class 3), and 15305 (Class 5). The Project is simply not eligible for these categorical exemptions.

Class 1 applies to the operation, repair, maintenance, or minor alteration of existing structures involving "negligible or no expansion of use". The Project involves the demolition of a vacant 2,135 square-foot Pizza Hut building and the new construction of an entirely new 1,479 square-foot Starbucks drive-through. A complete change in use and character that introduces a high-intensity vehicular drive-through is not a "minor alteration" or "negligible expansion of use".

Furthermore, the City cannot rely on Class 3 or Class 5 exemptions. Granting a highly discretionary Conditional Use Permit for a drive-through adjacent to residential zoning, allowing extended operating hours starting at 4:30 AM, and permitting numerous deviations from Commercial Corner Development standards does not constitute a "minor alteration in land use limitations." During the APC hearing, the City added the Class 3 exemption at the last minute without having adequately analyzed these environmental impacts.

II. The Project is Not Exempt from CEQA Due to “Unusual Circumstances” Under CEQA Guidelines Section 15300.2(c)

Even if the categorical exemptions applied, they are strictly precluded by the "unusual circumstances" exception under CEQA Guidelines Section 15300.2(c). This exception prohibits the use of a categorical exemption when there is a reasonable possibility of a significant effect on the environment due to unusual circumstances.

Unusual Circumstances. The combination of the Project's specific characteristics constitutes unusual circumstances. The site requires a Zone Boundary Adjustment, sits immediately adjacent to RS-1 single-family homes (buffered only by a 20-foot alley), and proposes an inherently high-volume vehicular drive-through with operating hours extending from 4:30 AM until 11:00 PM. These unusual circumstances create a reasonable possibility of significant environmental effects.

Significant Effects on Air Quality. The inherent queuing and idling of up to 13 cars placed adjacent to residential uses introduces severe localized air quality and toxic fume impacts. As detailed in the expert report by Ray Kapahi of Environmental Permitting Specialists, the exhaust from cars in the drive-through will cause 1-hour NO_x emissions to exceed federal ambient air quality standards by a wide margin. Specifically, NO_x concentrations at the adjacent homes, located just 60 to 75 feet away, are estimated to exceed 450 micrograms per cubic meter—more than twice the federal standard designed to protect public health.

During the APC hearing, the Applicant's representative claimed that the air quality report's assumption of cars idling for 18.5 hours a day was "unrealistic." However, Mr. Kapahi's March 9, 2026 rebuttal letter explicitly refutes this criticism, affirming the methodological soundness of the air quality modeling and confirming the significant, unmitigated threat to public health.

Significant Effects on Noise. The Project will cause significant noise impacts from constant vehicular noise, car doors, idling, and trash collection between 4:30 AM and 11:00 PM.

According to the expert acoustical report prepared by Steve Rogers Acoustics, the City's reliance on a 6-foot wall to mitigate these impacts is unsupported by any technical data. A 6-foot wall will provide no meaningful reduction in noise for adjacent second-story windows or from sound refracting over the wall.

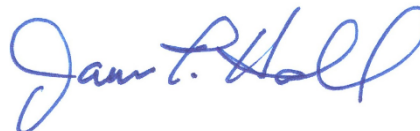
Significant Effects on Traffic and Safety. The Project's design inherently creates a significant traffic hazard. This is evidenced by the City's own mandated conditions of approval, which require the installation of a "Right Turn Only" egress and explicitly mandate that an employee be stationed outside to "facilitate traffic movement" when the queue exceeds 13 cars. If a project requires human traffic control to function safely, a traffic hazard exists by definition. The City failed to conduct a formal traffic assessment under CEQA despite these glaring hazards.

III. Conclusion

The Project involves the demolition and complete change of use of an existing facility to introduce a high-intensity drive-through adjacent to single-family homes. The Project presents unusual circumstances and, as documented by substantial expert evidence, threatens to cause significant environmental impacts relating to air quality, noise, and traffic hazards. Therefore, the City cannot legally rely on Class 1, Class 3, or Class 5 Categorical Exemptions. We respectfully request that the City Council grant the appeal, revoke the CEQA clearance, and require the preparation of an appropriate environmental review document.

Thank you for your consideration of this matter. I may be contacted at jamie.hall@channellawgroup.com if you have any questions, comments or concerns.

Sincerely,



Jamie T. Hall

Encls.:

- Exhibit A** – Appeal Justification Letter dated November 5, 2025
- Exhibit B** – Supplemental Appeal Justification Letter dated February 2, 2026
- Exhibit C** – Rebuttal Appeal Justification Letter dated February 10, 2026
- Exhibit D** – South Valley APC Hearing PowerPoint Presentation
- Exhibit E** – Transcript of South Valley APC Hearing (February 12, 2026)
- Exhibit F** – Rebuttal Letter by Air Quality Expert Ray Kapahi (March 9, 2026)

Channel Law Group, LLP

March 24, 2026

Justification for CEQA Appeal;
23717 West Victory Boulevard; Case Nos.: ZA-2024-5222-CU2-ZBA;
ENV-2024-5223-CE (“Project”)

EXHIBIT A

Appeal Justification Letter dated November 5, 2025

Channel Law Group, LLP

8383 Wilshire Blvd.
Suite 750
Beverly Hills, CA 90211

Phone: (310) 347-0050
Fax: (323) 723-3960
www.channellawgroup.com

JULIAN K. QUATTLEBAUM, III
JAMIE T. HALL *
CHARLES J. McLURKIN
GREGORY T. WITTMANN

*ALSO Admitted in Texas

Writer's Direct Line: (310) 982-1760
jamie.hall@channellawgroup.com

November 5, 2025

VIA ELECTRONIC UPLOAD

Re: Justifications for Appeal of Case No. ZA-2024-5222-CU2-ZBA, Conditional Use Permit and Zone Boundary Adjustment, 23717 Victory Boulevard (Proposed Starbucks Drive-Through)

Dear South Valley Area Planning Commission:

This firm represents West Valley Alliance for an Optimal Living (“Association” or “Appellant”), a not-for project unincorporated association. Appellant and its members have a direct and substantial beneficial interest in ensuring that the City complies with laws relating to environmental protection and orderly growth of the City.

This letter outlines the justifications for appeal of the Zoning Administrator's (“ZA”) approval of Case No. ZA-2024-5222-CU2-ZBA, which authorizes the construction, use, and maintenance of a new 1,479 square-foot Starbucks Drive-Through Coffee Shop at 23717 Victory Boulevard.

As explained below, the ZA erred in making the requisite findings for the entitlements, as the administrative record, including the concerns raised during the public hearing on September 6, 2025, contains substantial evidence demonstrating that the Project's significant features, size, and operation will be incompatible with, and detrimental to, the adjacent Low Residential (RS-1) properties and the surrounding neighborhood.

GROUND FOR APPEAL: THE ZA ERRED IN MAKING REQUIRED FINDINGS

The Zoning Administrator failed to apply the correct legal standard and ignored substantial evidence from the public testimony, which directly undermines the required Conditional Use Permit (CUP) and Drive-Through Establishment findings (Letter of Determination (“LOD”), Pages 15-24).

I. CONDITIONAL USE FINDING NO. 2 (Compatibility and Adverse Effects)

The ZA found that the project's location, size, height, operations, and other significant features "will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare and safety." (LOD, Page 17).

This finding is not supported by substantial evidence and is directly contradicted by the following testimony presented at the public hearing conducted on September 6, 2025.

- **Traffic and Circulation Degradation:** Public testimony repeatedly highlighted the project's impact on an already burdened intersection. Mr. Jeff Bornstein of West Valley Alliance and other residents explicitly stated concerns regarding traffic being added by the project and the intersection being busy (LOD, Pages 14-15). The ZA attempts to mitigate this with a "Right Turn Only" egress condition (LOD, Page 19, 25), yet ignores the inherent high-volume, high-turnover nature of the proposed use which will inevitably lead to traffic spillover onto Victory Boulevard (LOD, Page 16, 18), especially when the 13-car queue is exceeded (LOD, Page 19). The testimony suggests this use is an inadequate fit for a site so constrained, contradicting the finding of no adverse effect on public safety and vehicular circulation.
- **Noise and Late Night Operation:** The proposed hours (closing 10:00 PM to 11:00 PM) are an extension of the allowable Commercial Corner Development hours (7:00 AM to 11:00 PM). Mr. Bornstein specifically noted that the proposed hours were "too late" given the proximity to homes to the west (LOD, Page 14). The ZA's reliance on a new 6-foot wall and Automatic Volume Control (AVC) for the speaker box as adequate mitigation (LOD, Page 19) is speculative and inadequate. The primary source of noise is not the speaker box, but the vehicular movement, car doors, and customer conversations from 4:30 AM until 11:00 PM, all occurring immediately adjacent to the RS-1 properties across the 20-foot alleyway. This proximity demonstrates a clear potential for significant disturbances, directly undermining the finding of compatibility.

II. DRIVE-THROUGH ESTABLISHMENT FINDING NO. 4 (Noise Protection)

The ZA found that "residential uses in the vicinity of a proposed drive-through fast-food establishment will be adequately protected from any significant noise resulting from outdoor speakers, autos, or other sources of noise associated with the lot." (LOD, Page 21).

The ZA's finding fails to address the unique constraints of this site and the nature of the use, contradicting the public record.

- **Buffer Inadequacy:** The ZA claims the residential uses are "buffered by a 20-foot alley and trees on walls" (LOD, Page 19). The presence of a 20-foot alley is not a *buffer* provided by the project; it is a pre-existing condition, and is, in fact, the closest point of separation between the commercial and residential zones. The new 6-foot wall and

existing parking asphalt (LOD, Page 21) are insufficient to shield residents from high-volume, late-night traffic and operation noise. As the adjacent residential uses are single-family homes (RS-1), the noise from idling cars, honking, loud music, and customer interactions occurring during the drive-through's long operational hours (4:30 AM to 11:00 PM) will be projected directly toward and over a standard 6-foot masonry wall.

- **Queueing Proximity:** The design places the drive-through lane, capable of holding 13 vehicles, immediately along the western (residential-adjacent) side of the property, retaining "existing parking areas on the western property line" (LOD, Page 21) due to utility/easement constraints. This design choice forces all associated noise, idling fumes, and light scatter (despite conditions for shielding) into the most sensitive area of the property, directly impacting the RS-1 homes. The finding that the residents are "adequately protected" is factually unsupported given the operational proximity.

III. DRIVE-THROUGH ESTABLISHMENT FINDING NO. 6 (Minimizing Disturbance and Enhancing Privacy)

The ZA found that "trash storage, trash pickup hours, driveways, parking locations, screening walls, trees and landscaping are provided for and located so as to minimize disturbance to the occupants of nearby residential uses, and to enhance the privacy of those uses." (LOD, Page 23)

The ZA's conclusion that the design minimizes disturbance and enhances privacy is flawed:

- **Parking Lot/Drive-Through as "Buffer":** The ZA relies on the parking lot and drive-through lane itself being retained on the western property line (closest to the RS-1 homes) as a necessary condition due to easements (LOD, Page 23-24). This choice places high-activity, noise, and fume-generating vehicle movement directly next to residences, which is inherently the opposite of minimizing disturbance. The required new 6-foot wall only offers minimal ground-level visual screening; it does not eliminate the operational noise, light, or privacy intrusion caused by patrons in cars, who are elevated above the fence line.
- **Trash Location and Scheduling:** While a trash enclosure is proposed to be locked and comply with standards, the ZA's finding fails to address the trash pickup hours. Given the extended hours of operation (ending at 11:00 PM), trash pickup is likely to occur in the early morning hours, creating significant noise disturbance (slamming containers, beeping trucks) for the RS-1 residents, who are separated only by a 20-foot alley. This is a common point of contention, and the finding that the location minimizes disturbance is questionable without specific conditions prohibiting early morning trash service.

IV. **MINI-SHOPPING CENTER/COMMERCIAL CORNER FINDING NO. 7 (Traffic Hazard/Congestion)**

The ZA found that ingress/egress "will not create a traffic hazard or cause significant traffic congestion or disruption of vehicular circulation on adjacent streets." (LOD, Page 24). As explained below, this finding was in error.

- **Identified Hazards Require Mitigation:** This finding is undermined by the ZA's own imposed conditions. The ZA explicitly required the applicant to "coordinate with the Department of Transportation (LADOT) West Valley District Office to... install traffic measures to prohibit left turns from the eastbound lanes of Victory Boulevard" and also conditioned the driveway to be "Right Turn Only" egress (LOD, Page 25, Condition 27). Furthermore, the ZA conditioned the presence of an employee during peak times and when the queue exceeds 13 cars "to facilitate traffic movement" (LOD, Page 25, Condition 28). The necessity of mandating signage, traffic measures, and employee facilitation demonstrates that, *without* these measures, the project *would* create a traffic hazard or significant disruption. This places the burden of preventing a known hazard onto the applicant's operations, rather than designing it out of the site, which suggests the project's size and design are inherently incompatible with the intersection.
- **Failure to Trigger Traffic Assessment:** The ZA stated the project "does not meet the threshold to trigger a traffic assessment" (LOD, Page 25). Given the substantial public testimony on traffic, the site's proximity to a major intersection, and the acknowledged need for mandated traffic controls (Right-Turn Only, No Left Turn In, employee management), the ZA erred by not requiring a focused traffic analysis. The anecdotal evidence from the public hearing is substantial enough to warrant formal CEQA analysis on traffic, as the ZA's reliance on LADOT's high-level review, which in turn required heavy operational conditions, is insufficient to support the finding that no significant congestion will occur.

V. **Failure to Comply with California Environmental Quality Act**

The Zoning Administrator's determination (LOD, Page 1) that the project is exempt from CEQA pursuant to CEQA Guidelines Sections 15301 (Class 1) and 15305 (Class 5) is in error. The project is simply not eligible for a categorical exemption from CEQA. Further, the project is subject to the Significant Effect/Unusual Circumstances Exception of CEQA Guidelines Section 15300.2(c).

- **Inapplicability of Class 1 (Existing Facilities) and Class 5 (Minor Alterations):**

The Project involves the demolition of the vacant 2,135 square-foot Pizza Hut building and new construction of a 1,479 square-foot drive-through coffee shop, a complete change in use and character requiring a Conditional Use Permit (CUP) and a Zone Boundary Adjustment. This is not a "minor alteration" or "negligible expansion of use" as required by Class 1. Furthermore, the project seeks a CUP for a drive-through adjacent to residential zoning and four deviations from Commercial Corner Development standards

(LOD, Page 2). Granting a highly discretionary CUP, extended operating hours (4:30 AM), and numerous deviations that facilitate a high-intensity vehicular use adjacent to a residential zone is not a "minor alteration in land use limitations" as required by Class 5.

- **Significant Effect Due to Unusual Circumstances (CEQA Guidelines §15300.2(c)):**
 - **Unusual Circumstances:** The combination of the Project's specific characteristics, as detailed in the four preceding sections, constitutes unusual circumstances with a reasonable possibility of having a significant environmental effect. The site requires a Zone Boundary Adjustment, sits immediately adjacent to RS-1 single-family homes (buffered only by a 20-foot alley), and is proposing an inherently high-volume vehicular use (drive-through) with operating hours extending until 11:00 PM and starting at 4:30 AM. Therefore, there are unusual circumstances which preclude the usage of a categorical exemption.
 - **Significant Effect:** Further, the administrative record contains substantial evidence (public testimony, LADOT conditions, etc.) of potential significant effects relating to:
 - **Noise:** Constant vehicular noise, car doors, idling, and trash collection noise between 4:30 AM and 11:00 PM, impacting the closest adjacent residential properties (LOD, Page 14).
 - **Traffic/Safety:** The necessity of mandatory conditions for a "Right Turn Only" egress, prohibition of left turns into the site, and required employee queuing management (Condition 27, 28) demonstrates that the project's design would otherwise result in a significant traffic hazard and disruption.
 - **Air Quality:** The inherent queuing and idling of up to 13 cars placed immediately adjacent to residential uses (LOD, Page 13) introduces localized air quality impacts (fumes/toxics) that were not analyzed by the ZA.

The existence of these unusual circumstances and the demonstrated potential for significant impacts remove the Project's eligibility for a categorical exemption from CEQA and require the preparation of an Initial Study to fully assess the environmental effects.

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CONCLUSION

The Zoning Administrator's determination relies on insufficient and speculative operational conditions to mitigate inherent land use conflicts, noise, and traffic impacts on adjacent RS-1 residential properties. The public testimony provided substantial evidence that the proposed Starbucks drive-through, operating until 11:00 PM, is too intense and inappropriately located to be compatible with its immediate neighbors.

Appellant reserves the right to supplement these bases for appeal.

For the foregoing reasons, the appeal should be granted.

Thank you for your consideration of this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jamie T. Hall", written in a cursive style.

Jamie T. Hall

Channel Law Group, LLP

March 24, 2026

Justification for CEQA Appeal;
23717 West Victory Boulevard; Case Nos.: ZA-2024-5222-CU2-ZBA;
ENV-2024-5223-CE (“Project”)

EXHIBIT B

Supplemental Appeal Justification Letter dated February 2, 2026

Channel Law Group, LLP

8383 Wilshire Blvd.
Suite 750
Beverly Hills, CA 90211

Phone: (310) 347-0050
Fax: (323) 723-3960
www.channellawgroup.com

JULIAN K. QUATTLEBAUM, III
JAMIE T. HALL *
CHARLES J. McLURKIN
GREGORY T. WITTMANN

Writer's Direct Line: (310) 982-1760
jamie.hall@channellawgroup.com

*ALSO Admitted in Texas

February 2, 2026

VIA ELECTRONIC MAIL

South Valley Area Planning Commission
200 North Spring Street, Room 763
Los Angeles, CA 90012
apcsouthvalley@lacity.org
henry.chu@lacity.org
stephanie.escobar@lacity.org

**Re: Supplemental Justification for Appeal of Case No. ZA-2024-5222-CU2-ZBA,
Conditional Use Permit and Zone Boundary Adjustment, and ENV Case No.
2024-5223-CE, 23717 Victory Boulevard (Proposed Starbucks Drive-Through)**

Dear South Valley Area Planning Commission:

This firm represents West Valley Alliance for Optimal Living (“Appellant”), a not-for profit unincorporated association. Appellant and its members have a direct and substantial beneficial interest in ensuring that the City of Los Angeles (“City”) complies with laws relating to environmental protection and orderly growth of the City.

This supplemental letter¹ continues to outline the justifications for appeal of the Zoning Administrator's (“ZA”) approval of Case No. ZA-2024-5222-CU2-ZBA, and ENV Case No. 2024-5223-CE (“Project Approval”), which authorizes the construction, use, and maintenance of a new 1,479 square-foot Starbucks Drive-Through Coffee Shop at 23717 Victory Boulevard (“Project”). The project site is zoned P-1VL and QC1-1VL (“Project Site”). The Project Site is located within the Canoga Park-Winnetka-Woodand Hills-West Hills Community Plan (“Community Plan”). The subject site is also within an Urban and Built-up Land zone, Outside Flood zone, Urban Agriculture

¹ In addition to providing the precise bases for the City’s failure to proceed in the manner required by the California Environmental Quality Act, this letter is also intended to provide pre-suit notification to the City to the extent such notification may be required. The City may remedy the errors identified herein by not deeming the project exempt from CEQA and instead preparing an environmental report for the Project. Appellant will provide the City with a reasonable opportunity to correct these errors by not commencing litigation for at least 14 days after the City’s final approval of the Project (should that occur).

Incentive zone, and located within 8.37 miles (13.47 kilometers) from the Malibu Coast Fault. The Letter of Determination (“LOD”) acknowledges that to the south and to the west of the project site, there are low residential and single-family residences. LOD at p. 10. There are also residences to the north of the project site.

As explained below, the ZA erred in making the requisite findings for the entitlements, as the record, including the concerns raised during the public hearing on September 6, 2025, contains substantial evidence demonstrating that the Project's significant features, size, and operation will be incompatible with, and detrimental to, the adjacent Low Residential (RS-1) and single-family residences properties and the surrounding neighborhood. The Project harms the public’s health, safety, and welfare. Therefore, the Project’s approval should be set aside, and the City should conduct proper project review and environmental review as required by the California Environmental Quality Act (“CEQA”).

I. GROUNDS FOR APPEAL: THE ZA ERRED IN MAKING REQUIRED FINDINGS

The Zoning Administrator failed to apply the correct legal standard and ignored substantial evidence from the public testimony, which directly undermines the required Conditional Use Permit (CUP) and Drive-Through Establishment findings (LOD at p. 15-24), and CEQA findings and determination (LOD at p. 1-15).

A. Conditional Use Finding No. 2 – Compatibility and Adverse Effects

The ZA found that the Project's location, size, height, operations, and other significant features "will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare and safety." (LOD at p. 17). The Project’s location, size, height, operations and other significant features will not be compatible with and will adversely affect or further degrade adjacent properties, the surrounding neighborhood, and the public health, welfare, and safety. The February 1, 2026, noise report prepared by Steve Rogers Acoustics (“Noise Report”) supports the position the Project is against the public health, welfare, and safety, and Project Approval should be set aside. A true and correct copy of the Noise Report is attached hereto as **Exhibit 1**.

The ZA’s finding is not supported by substantial evidence and is directly contradicted by the Noise Report and the following testimony presented at the public hearing conducted on September 6, 2025, among other things.

The Noise Report points out the ZA’s deficiencies in stating, at page 2, “However, the ZA provides no analysis [or] other supporting evidence for the claim that a 6-foot high wall and a screen around the rooftop HVAC equipment will be sufficient to eliminate adverse noise impacts in the neighboring homes or to ensure that those residential properties are not degraded by the e noise of drive-through operations, which include nighttime operations.”

1. Traffic and Circulation Degradation

Public testimony repeatedly highlighted the project’s impact on an already burdened intersection. Mr. Jeff Bornstein of West Valley Alliance for Optimal Living and other residents

explicitly stated concerns regarding traffic being added by the Project and the intersection being busy (LOD at p. 14-15). The ZA attempts to mitigate this with a "Right Turn Only" egress condition (LOD at p. 19, 25), yet ignores the inherent high-volume, high-turnover nature of the proposed use which will inevitably lead to traffic spillover onto Victory Boulevard (LOD at p. 16, 18), especially when the 13-car queue is exceeded (LOD at p. 19). Starbucks is a very popular coffee shop. And its drive throughs often exceed capacity in urban Los Angeles. Undoubtedly, the 13-car queue will be exceeded. In an email dated September 9, 2025, from Mr. Bornstein, Mr. Bornstein stated that the drive-through lane is awkward and cars will impact the streets and that too many deviations are being requested. (LOD at p.11.) Moreover, in an email dated September 24, 2025, from Jen Westmoreland, Ms. Westmoreland stated observations of accidents near Victory and Platt intersection. (LOD at p.11.) She further stated that some drivers speed. Ms. Westmoreland further stated that the site cannot accommodate a drive-through and created additional traffic *nightmares*. In an email dated September 10, 2025, and another email dated September 11, 2025, Mr. Fern White states that the project adds traffic congestion to an already busy intersection and that there already exists a coffee shop next door. (LOD at p.11.) In an email dated September 23, 2025, Steven Brtis states that the Project adds to traffic and parking concerns. (LOD at p.11.) In an email dated September 11, 2025, Cathy Connell stated the project will add to an increase in traffic dangers. (LOD at p. 11.) The testimony provides substantial evidence that the project use is an inadequate fit for a site so constrained, contradicting the finding of no adverse effect on public safety and vehicular circulation.

2. Table A: 23717 Victory Blvd. Project Trip Generation (Fast-Food Pass-By)

The project will generate 674 daily trips, whereas a coffee shop with drive through is usually 533.57 daily trips. See attached **Exhibit 2**, which is a true and correct copy of Table A from the City's files. Thus, the Project will generate over 140 daily trips more than a coffee shop with drive-through. Since there is currently no existing operating business at the Project Site, the Project will generate over 674 additional daily trips at the Project Site. It appears the prior business at the Project Site has been non-operational since at least 2022. The LOD at p. 12 admits that the former Pizza Hut building has been vacant for a number of years.

3. Noise and Late-Night Operation

The proposed hours (4:30 AM to 10:00 PM Monday through Thursday and 4:30 AM to 11:00 PM Friday to Sunday) are an extension of the allowable Commercial Corner Development hours (7:00 AM to 11:00 PM). Mr. Bornstein specifically noted that the proposed hours were "too late" given the proximity to homes to the west (LOD at p. 14), in addition to the homes that are to the north and south of the project site. The ZA's reliance on a new 6-foot wall and Automatic Volume Control ("AVC") for the speaker box as adequate mitigation (LOD at p. 19) is speculative and inadequate. In addition to the speaker box noise, there is greater noise from the vehicular movement, car doors, customer conversations, and customers walking to and from the Starbucks from 4:30 AM until 11:00 PM, all occurring immediately adjacent to the RS-1 properties across the 20-foot alleyway, and the residences to the south, west, and north of the project site, which do not have the alley as a separation. This proximity demonstrates a clear potential for significant disturbances, directly undermining the finding of compatibility. Furthermore, the 16 parking spots

and EV charging station will provide additional noise to the neighboring residences. Also, the “routine” cleanup will be allowed after hours. (LOD at p. 3., Item 9.) The LOD does not define “routine” cleanup. In addition to these noises, there will be noises generated by the employees’ required activities, such as talking to each other and to customers, parking, taking out the trash, and cleaning.

The Noise Report, at page 2, specifically states that Conditions 17 and 18 of the LOD do not address the steady flow of vehicles through the drive-through, vehicle doors and music playing in vehicles, interactions at the ordering and pickup points (and with Starbucks staff taking orders outside in the case that the queue exceeds 13 vehicles), etc.

The Noise Report, at page 2, further states that: “Condition 22 does not eliminate truck reversing/beeping (which would be impossible in practice) nor does it forbid delivery trucks driving (forward or backwards) in the alleyway. It also places no restrictions on the time that deliveries may occur – presumably opening the possibility of nighttime deliveries as late as 11:00 PM and as early as 4:30 AM. So, as written, Condition 22 does not adequately mitigate adverse noise impacts or ensure that the noise of delivery trucks does not degrade the nearby residential properties.

4. Zone Boundary Adjustment

The Project requires a Conditional Use Permit (“CUP”) and zone boundary adjustment to allow the construction, use, and maintenance of a new 1,479 square-foot Starbucks drive-through coffee shop. The Project proposes an adjustment to the C1 zone boundary so that the entire building, signage, patio, trash enclosure, and drive-through lanes are all within the boundaries of the commercial zone. The Project does not fit within the confines of the existing zoning and land use parameters, so the project applicant requires a CUP, zone boundary adjustment, and a zone change. Thus, the project applicant seeks a reconfiguration of the existing project site to accommodate his project and peg it into the existing land.

- **Failure to Specify Duration of CUP:** The ZA findings fail to specify the duration of the CUP. The findings need to specify when the CUP will expire.
- **At Minimum 2 Other Coffee Shops Nearby:** There are at least two other coffee shops currently existing near the project site. For example, a Coffee Bean Tea and Leaf is next to the project site, approximately 15 feet away, and an existing Starbucks is across the street from the project site. This additional drive-through Starbucks is not needed in the community.
- **The Project Site Easements Are Not Delineated:** The City documents reference easements in connection with the Project Site, but the City fails to delineate the easements at or near the Project Site. Neither the legal description nor the physical layout of the easements have been provided to the public.

B. Drive-Through Establishment Finding No. 4 – Noise Protection

The ZA found that "residential uses in the vicinity of a proposed drive-through fast-food

establishment will be adequately protected from any significant noise resulting from outdoor speakers, autos, or other sources of noise associated with the lot." (LOD at p. 21).

The ZA's finding fails to address the unique constraints of this site and the nature of the use, contradicting the public record.

1. Buffer Inadequacy:

The ZA claims the residential uses are "buffered by a 20-foot alley and trees on walls" (LOD at p. 19). The presence of a 20-foot alley is not a *buffer* provided by the Project; it is a pre-existing condition, and is, in fact, the closest point of separation between the commercial and residential zones. The new 6-foot wall and existing parking asphalt (LOD at p. 21) are insufficient to shield residents from high-volume, late-night traffic, and operation noise. As the adjacent residential uses are single-family homes (RS-1), the noise from idling cars, honking, loud music, and customer interactions occurring during the drive-through's long operational hours (4:30 AM to 11:00 PM) will be projected directly toward and over a standard 6-foot masonry wall. The Noise Report, at pages 2 to 3, states that there is no analysis to show how much a 6-foot wall will reduce noise from cars, trucks, in-car music, ordering/pickup interactions, etc., or what the net levels of noise received beyond the western property line will be. In other words, there is no support for the ZA's claim that the neighboring homes will be "adequately protected" from noise. Also, the alleyway is only partially to the west, so it does not cover the entire western boundary. There is no alley at the northern part of the western boundary. The ZA ignores the residences to the north and south of the project site. Further, all of the easements on the Project Site need to be delineated and disclosed to the public, but they are not.

2. Queueing Proximity

The design places the drive-through lane, capable of holding 13 vehicles, immediately along the western (residential-adjacent) side of the property, retaining "existing parking areas on the western property line" (LOD at p. 21) due to utility/easement constraints. This design choice forces all associated noise, idling fumes, and light scatter (despite conditions for shielding) into the most sensitive area of the property, directly impacting the RS-1 homes, which are to the north, south, and west of the project site. The finding that the residents are "adequately protected" is factually unsupported given the operational proximity.

C. Drive-Through Establishment Finding No. 6 – Minimizing Disturbance and Enhancing Privacy

The ZA erroneously found that "trash storage, trash pickup hours, driveways, parking locations, screening walls, trees and landscaping are provided for and located so as to minimize disturbance to the occupants of nearby residential uses, and to enhance the privacy of those uses." (LOD at p. 23)

The ZA's conclusion that the design minimizes disturbance and enhances privacy is flawed.

1. **Parking Lot/Drive-Through as “Buffer”**

The ZA relies on the parking lot and drive-through lane itself being retained on the western property line (close to the RS-1 homes) as a necessary condition due to easements (LOD at p. 23-24). This choice places high-activity, noise, and fume-generating vehicle movement directly next to residences, which is inherently the opposite of minimizing disturbance. The required new 6-foot wall only offers minimal ground-level visual screening; it does not eliminate the operational noise, light, privacy intrusion caused by patrons in cars, who are elevated above the fence line, or other noise generated at the Project Site.

2. **Trash Location and Scheduling**

While a trash enclosure is proposed to be locked and comply with standards, the ZA's finding fails to address the trash pickup hours. Given the extended hours of operation (starting at 4:30 AM and ending at 10:00 PM Monday through Thursday and ending at 11:00 PM Friday through Sunday), trash pickup is likely to occur in the early morning hours, creating significant noise disturbance (slamming containers, beeping trucks) for the RS-1 residents, who are separated only by a 20-foot alley at most. This is a common point of contention, and the finding that the location minimizes disturbance is questionable without specific conditions prohibiting early morning trash service.

3. **Noise Report Determination That ZA Findings Are Deficient and Inadequate**

Drive-Through Location: Moving, parked and parking vehicles will be generating noise all over the Project Site – including close to the western property line and the neighboring homes. So, the ordering point and speaker box location do not mitigate the noise issues. (Noise Report at p. 3.)

Speaker Box, Volume Control: This does nothing to mitigate noise impacts from vehicles/traffic. (Noise Report at p. 3.)

Vehicles Not Noise Barriers: Vehicles, whether queuing in the drive-through itself or elsewhere on the site, are a source of noise in their own right – much more significant than the ordering speaker box – and yet are not addressed in the findings. (Noise Report at p. 3.)

New 6-Foot-High Wall: No calculations are provided in the findings to show how much reduction the wall will provide and what the net noise levels will be at the nearby homes. (Noise Report at p. 4.)

Alley Not a Mitigating Feature: The alley is an existing part of the neighborhood, not a project design feature. The findings lack analysis to show how much noise attenuation is achieved by the extra distance. There is no alley at the northwest boundary. (Noise Report at p. 4.)

Landscaping: It is simply not true that the proposed landscaping will act as a barrier to noise. It would take a deep (50 to 100 feet) continuous band of densely-planted trees to provide any meaningful reduction in noise. (Noise Report at p. 4.)

D. Mini-Shopping Center/Commercial Corner Finding No. 7 – Traffic Hazard/Congestion

The ZA incorrectly found that ingress/egress "will not create a traffic hazard or cause significant traffic congestion or disruption of vehicular circulation on adjacent streets." (LOD at p. 24). As explained below, this finding was in error.

1. Identified Hazards Require Mitigation

This finding is undermined by the ZA's own imposed conditions. The ZA explicitly required the applicant to "coordinate with the Department of Transportation ("LADOT") West Valley District Office to... install traffic measures to prohibit left turns from the eastbound lanes of Victory Boulevard" and also conditioned the driveway to be "Right Turn Only" egress (LOD at p. 25, Condition 27). Furthermore, the ZA conditioned the presence of an employee during peak times and when the queue exceeds 13 cars "to facilitate traffic movement" (LOD at p. 25, Condition 28). The necessity of mandating signage, traffic measures, and employee facilitation demonstrates that, *without* these measures, the Project *would* create a traffic hazard or significant disruption. This places the burden of preventing a known hazard onto the applicant's operations, rather than designing it out of the site, which suggests the Project's size and design are inherently incompatible with the intersection. The ZA ignores that McDonald's has an existing drive-through lane which compounds the Project Site's significant and adverse hazards, traffic, and circulation issues. Further, the ZA fails to address where customers will park their vehicles when there are no available parking spaces at the project site and there are 13 cars in the drive-through lane.

2. Failure to Trigger Traffic Assessment

The ZA stated the project "does not meet the threshold to trigger a traffic assessment" (LOD at p. 25). Given the substantial public testimony on traffic, the site's proximity to a major intersection, and the acknowledged need for mandated traffic controls (Right-Turn Only, No Left Turn In, employee management), the ZA erred by not requiring a focused traffic analysis. The substantial evidence based on fact from the public hearing is substantial enough to warrant formal CEQA analysis on traffic, as the ZA's reliance on LADOT's high-level review, which in turn required heavy operational conditions, is insufficient to support the finding that no significant traffic or congestion will occur. The City cannot rely on a threshold because thresholds are not conclusive nor dispositive. (*Mejia v. City of Los Angeles* (2005) 130 Cal.App.4th 322.) Substantial evidence exists supporting significant adverse impacts to traffic and circulation, requiring a traffic assessment and study prior to any project approval.

E. Conditional Use Finding No. 1 – Enhancement of Surrounding Neighborhood and Essential or Beneficial Service

The ZA erroneously found that the project will enhance the built environment in the surrounding neighborhood or perform a function or service that is essential or beneficial to the city, community, or region. (LOD at p. 15.) The Project, consisting of a Class 2 CUP and a Zone Boundary Adjustment to allow the construction, use, and maintenance of a new Starbucks drive-through coffee shop is a zone change to accommodate the Project of approximately 1,479 square feet. This is a zone change and is inconsistent with the Canoga Park-Winnetka-Woodland Hills-West

Hills Community Plan. A true and correct copy of the Community Plan from the City’s website is attached hereto as **Exhibit 3**. For example, the Project is changing the zoning and is interfering with the nearby residential areas.

F. Conditional Use Finding No. 3 – Substantial Conformance with General Plan/Community Plan

The ZA erroneously found that the Project substantially conforms to the purpose, intent, and provisions of the General Plan, including the Community Plan. (LOD at p. 20.) For example, the LOD at p. 21, inaccurately states that: “The limited hours ensure compatibility with the nearby residential uses.” First, the hours are not limited because the hours are from 4:30 AM to 11:00 PM on the weekends and 4:30 AM to 10:00 PM Monday through Thursday. Second, the nearby residences are to the north, west, and south of the project site and the conditions imposed by the ZA do not protect the nearby residences.

The Project, consisting of a Class 2 CUP and a Zone Boundary Adjustment to allow the construction, use, and maintenance of a new Starbucks drive-through coffee shop is a zone change to accommodate the project of approximately 1,479 square feet. This is a zone change and is inconsistent with the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan. For example, the project is changing the zoning and is adversely interfering with the nearby residential areas. Community issues include the need to preserve existing single-family neighborhoods (see **Exh. 3** Community Plan at p. I-3), inadequate transition between commercial and residential uses (see **Exh. 3** Community Plan at p. I-4), and traffic speed and/or volume compromises safety and quality of many residential neighborhoods and some commercial areas (see **Exh. 3** Community Plan at p. I-5).

Opportunities include establishing appropriate transition between commercial and adjoining, primarily residential, uses (see **Exh. 3** Community Plan at p. I-4), and improving physical appearance of commercial districts and reducing scales of commercial development adjacent to residential neighborhoods (see **Exh. 3** Community Plan at p. I-4). The neighborhood character is to preserve and enhance the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks, and appearance. (See **Exh. 3** Community Plan at p. I-9.) The intent of the Community Plan is the promotion of an arrangement of land uses, streets, and services which will encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the people who live and work in the community. (See **Exh. 3** Community Plan at p. II-2.)

The plan also guides development to create a healthful and pleasant environment. (See **Exh. 3** Community Plan at p. II-2.) Current Plan policy provides for continued preservation of the existing single-family districts and multi-family clusters. (See **Exh. 3** Community Plan at p. III-1.) Goal 1 is to have a safe, secure, and high-quality residential environment for all economic, age, and ethnic segments of the Canoga Park-Woodland Hills-West Hills Community Plan Area. (See **Exh. 3** Community Plan at p. III-2.) Objective 1-1.3 is to protect existing stable single-family and low-density residential neighborhoods from being impacted by the size of commercial development. Objective 1-1.5 is to protect existing stable single family and low-density residential neighborhoods

from encroachment by higher density and other incompatible uses. (See **Exh. 3** Community Plan at p. III-3.) All zone changes, subdivisions, parcel maps, variances, conditional uses, specific plans, and community and neighborhood revitalization programs for residential projects shall be consistent with Community Plan land use designations. (See **Exh. 3** Community Plan at p. III-3.) Goal 15 is to have a sufficient system of well-designed and convenient on-street parking and off-street parking facilities throughout the plan area. (See **Exh. 3** Community Plan at p. III-23.) The Project as approved by the ZA fails to conform to all of these issues, opportunities, intent, and goals of the Community Plan. Thus, the Project Approval must be set aside.

G. Failure to Comply with California Environmental Quality Act

The Zoning Administrator's determination (LOD at p. 1) that the Project is exempt from CEQA pursuant to CEQA Guidelines Sections 15301 (Class 1) and 15305 (Class 5) is in error.

The Project is simply not eligible for a categorical exemption from CEQA. Further, the Project is subject to the Significant Effect/Unusual Circumstances Exception of CEQA Guidelines Section 15300.2(c).

1. Inapplicability of Class 1 (Existing Facilities) and Class 5 (Minor Alterations)

The Project involves the demolition of the vacant 2,135 square-foot Pizza Hut building and new construction of a 1,479 square-foot drive-through Starbucks coffee shop, a complete change in use and character requiring a Conditional Use Permit and a Zone Boundary Adjustment. This is not a "minor alteration" or "negligible expansion of use" as required by Class 1. The Noise Report, at **Exhibit 1** p. 1, affirmatively states, "...[T]he project is a new construction of a coffee shop and drive-through, as opposed to minor interior/exterior modification or repairs to an existing facility, and introduces new noise sources (such as drive-through traffic, outdoor ordering and pickup interactions, etc.), so does not qualify as a Class 1 project according to CEQA Guidelines Section 15301." Furthermore, the Project seeks a CUP for a drive-through adjacent to residential zoning and four deviations from Commercial Corner Development standards (LOD at p. 2). Granting a highly discretionary CUP, extended operating hours (4:30 AM to 10 PM or 11 PM), and numerous deviations that facilitate a high-intensity vehicular use adjacent to a residential zone is not a "minor alteration in land use limitations" as required by Class 5. The Noise Report, at page 1, references the extended operating hours next to a residential zone, and states that given the potential for significant nighttime noise impacts, the proposed land use alterations cannot be considered "minor" and the Project does not therefore fall into the Class 5 categorical exemption under CEQA Guidelines Section 15305. Further, the Project seeks a Zone Boundary Adjustment to change the zoning on the project site to make the Project fit at the project site. This is further evidence that the Project does not consist of an "minor" alteration of land use limitations.

2. Significant Effect Due to Unusual Circumstances (CEQA Guidelines §15300.2(c))

Unusual Circumstances: The combination of the Project's specific characteristics, as detailed in the preceding sections, constitutes unusual circumstances with a reasonable possibility of having a significant environmental effect. The site requires a Zone Boundary Adjustment, sits

immediately adjacent to RS-1 single-family homes (buffered only by a 20-foot alley), and is proposing an inherently high-volume vehicular use (drive-through) with operating hours extending until 10:00 or 11:00 PM and starting at 4:30 AM. Therefore, there are unusual circumstances which preclude the usage of a categorical exemption. The Noise Report, at pages 1 to 2, supports the position, and concludes that unusual circumstances preclude the application of a categorical exemption to the project.

Significant Effect: Further, the administrative record contains substantial evidence (public testimony, LADOT conditions, etc.) of potential significant effects relating to:

- **Noise:** Constant vehicular noise, car doors, idling, and trash collection noise between 4:30 AM and 10:00 PM or 11:00 PM, impacting the closest adjacent residential properties (LOD at p. 14).
- **Traffic/Safety:** The necessity of mandatory conditions for a "Right Turn Only" egress, prohibition of left turns into the site, and required employee queuing management (Condition 27, 28) demonstrates that the project's design would otherwise result in a significant traffic hazard and disruption.
- **Air Quality:** The inherent queuing and idling of up to 13 cars placed immediately adjacent to residential uses (LOD at p. 13) introduces localized air quality impacts (fumes/toxics) that were not analyzed by the ZA. These negative air quality impacts are compounded when added to the existing queuing of the drive through and other cars going to McDonald's, which is immediately adjacent. Moreover, Appellant has commissioned an expert report from Ray Kapahi of Environmental Permitting Specialists (See **Exhibit 4**) who concluded as follows:
 1. The exhaust from cars in the drive through would exceed the 1-hour NO_x stand by a wide a wide margin. The adjacent homes would face exposure to vehicle exhaust 18 hours per day. This risk would continue for 18 hours per day, 365 days per year. For example, residents at the adjacent home located at 23801 Victory Blvd are only 60 feet from the drive-through lane and would be at the highest risk.
 2. Residents would also be exposed to higher concentration of carbon monoxide and fine particulate. The area already violates the air quality standards for PM₁₀ and PM_{2.5}. The additional emissions add to the already poor air quality that the residents must endure.
 3. The NO_x emissions would further exacerbate the area that is already suffering from the worst air quality in the country.
 4. Cancer risk from car exhaust would be less than significant (around 1 cancer per million). However, when added to the background risk, the impact is **cumulatively significant**.

The existence of these unusual circumstances and the demonstrated potential for significant impacts remove the Project's eligibility for a categorical exemption from CEQA and require the preparation of an Initial Study to fully assess the environmental effects.

II. CONCLUSION

The Zoning Administrator's determination relies on insufficient and speculative operational conditions to mitigate inherent land use conflicts, noise, and traffic impacts on adjacent RS-1 residential properties. The public testimony provided substantial evidence that the proposed Starbucks drive-through, operating from approximately 4:30 AM until 10:00 PM, Monday through Thursday and until 11:00 PM Friday to Sunday, is too intense and inappropriately located to be compatible with its immediate neighbors.

Appellant reserves the right to supplement these bases for appeal. For the foregoing reasons, the Appeal should be Granted. Thank you for your consideration of this matter.

Sincerely,



Jamie T. Hall

Encls.

Exhibit 1: Steve Rogers Acoustics Noise Report

Exhibit 2: Table A: 23717 Victory Blvd Project Trip Generation (Fast-Food Pass-By)

Exhibit 3: Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan

Exhibit 4: Environmental Permitting Specialists Air Quality / GHG Report

Channel Law Group, LLP

February 2, 2026

Supplemental Justification for Appeal of Case No. ZA-2024-5222-CU2-ZBA, Conditional Use Permit and Zone Boundary Adjustment, and ENV Case No. 2024-5223-CE, 23717 Victory Boulevard
(Proposed Starbucks Drive-Through)

EXHIBIT 1



Steve Rogers Acoustics

February 1, 2026

Jamie Hall
Channel Law Group, LLP
8383 Wilshire Boulevard, Suite 750
Beverly Hills, CA 90211
jamie.hall@channellawgroup.com

Subject: **Starbucks Drive-Through Coffee Shop Project, West Hills
Review of Noise Impacts**

Dear Jamie:

We have reviewed the Zoning Administrator's (ZA) Letter of Determination dated October 21, 2025 as well as findings provided by the Applicant's representatives – Kaidence Group – and have the following comments:

1. BACKGROUND

The Project is a new drive-through coffee shop to be located on a 23,500 ft² lot which fronts onto Victory Boulevard in West Hills, CA. There are adjacent single-family residential properties to the west, including one home that is immediately adjacent (common property line) to the northwest portion of the Project site. The ZA has determined that the project is exempt from the California Environmental Quality Act (CEQA) and has approved a Conditional Use Permit (CUP) and other entitlements, based on findings presented in a Letter of Determination (LOD) dated October 21, 2025. The purpose our review is to confirm the validity of the ZA's findings as they relate to the potential noise impact of the Project on the neighboring homes.

2. PROJECT IS NOT EXEMPT FROM CEQA

a) Project is Not in an Exempt Class

CEQA defines a number of classes of project that are categorically exempt from the requirement for preparation of environmental documents because they do not have a significant effect on the environment. The ZA has determined that the Project is exempt from CEQA because it falls in Class 1 (Existing Facilities per CEQA Guidelines Section 15301) and Class 5 (Minor Alterations in Land Use Limitations per CEQA Guidelines Section 15305).

However, the project is new construction of a coffee shop and drive-through, as opposed to minor interior/exterior modification or repairs to an existing facility, and introduces new noise sources (such as drive-through traffic, outdoor ordering and pickup interactions, etc.), so does not qualify as a Class 1 project according to CEQA Guidelines Section 15301.

Similarly, the proposed alterations in land use limitations include extended operating hours that would allow drive-through traffic adjacent to a residential zone from 4:30 AM to 11:00 PM. Given the potential for significant nighttime (before 7:00 AM and after 10:00 PM) noise impacts, the proposed land use alterations cannot be considered "minor" and the project does not, therefore, fall in Class 5 according to CEQA Guidelines Section 15305.

b) Unusual Circumstances, Probability of Significant Effect

According to Section 15300.2(c) of the CEQA Guidelines:

"A categorical exemption shall not be used for an activity where there is a reasonable possibility



that the activity will have a significant effect on the environment due to unusual circumstances.”

The Project in this case would include a new drive-through, operating from 4:30 AM to 11:00 PM, very close to residential properties. The unusual circumstances (close proximity to homes) and nature of the activity introduce a reasonable possibility of significant noise impacts – which disqualifies the Project from exemption from CEQA.

3. ZA'S LETTER OF DETERMINATION

a) Conditional Use Finding #2 is Not Adequately Supported

On page 20 of the LOD, the ZA states that:

“The applicant will also offer a less than five-foot wide landscaping along the west property line to maintain parking and construct a new 6-foot tall wall, serving as a noise barrier to protect residential uses. The project has been conditioned to shield HVAC equipment to reduce noise and visual impacts.”

And goes on to conclude that:

“As conditioned, the project will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety and the development of the community.”

However, the ZA provides no analysis other supporting evidence for the claim that a 6-foot high wall and a screen around the rooftop HVAC equipment will be sufficient to eliminate adverse noise impacts in the neighboring homes or to ensure that those residential properties are not degraded by the noise of drive-through operations, which include nighttime operations.

Conditions 17 and 18 (page 4 of the LOD) address the noise impact of outdoor speakers (such as the drive-through speaker box) but not the main sources of noise impact in the Project – namely, the steady flow of vehicles through the drive-through, vehicle doors and music playing in vehicles, interactions at the ordering and pickup points (and with Starbucks staff taking orders outside in the case that the queue exceeds 13 vehicles), etc.

Condition 22 (page 5 of the LOD) requires coordination with vendors to “minimize” driving of delivery trucks in reverse – triggering beeping noises – and to “avoid” driving of trucks in the alley. Condition 22 does not eliminate truck reversing/beeping (which would be impossible in practice) nor does it forbid delivery trucks driving (forward or backwards) in the alleyway. It also places no restrictions on the time that deliveries may occur – presumably opening the possibility of nighttime deliveries as late as 11:00 PM and as early as 4:30 AM. So, as written, Condition 22 does not adequately mitigate adverse noise impacts or ensure that the noise of delivery trucks does not degrade the nearby residential properties.

b) Drive-Through Finding #4 is Not Adequately Supported

On page 22 of the LOD, the ZA finds that:

“The project will also construct a new 6-foot tall wall that will contribute to offsetting any potential noise and disturbances from the drive-through operation. As such, residential uses in the vicinity of a proposed drive-through fast-food establishment will be adequately protected from any significant noise resulting from outdoor speakers, autos, or other sources of noise associated with the lot.”

However, there is no analysis to show how much a 6-foot wall will reduce noise from cars,



trucks, in-car music, ordering/pickup interactions, etc., or what the net levels of noise received beyond the western property line will homes be. In other words, there is no support for the ZA's claim that the neighboring homes will be "adequately protected" from noise.

4. KAIDENCE GROUP FINDINGS

Kaidence Group has provided several sets of written findings in support of the Project application. These findings include six features of the Project that purport to address noise control, as follows:

- The drive-through is located on the east side of the Project site – away from the residences along the western property line.
- The ordering speaker box is on the eastern property line and its volume will be controlled automatically to minimize sound spillover into the community
- Vehicles (presumably parked or queuing) between the speaker box and homes will act as barriers to noise
- A new 6-foot high wall at the western property line
- The alley between the project site will act as a "buffer" to noise.
- New landscaping will "help mitigate sound".

There is no analysis or other evidence to show that the design of the project will adequately control noise emissions. And, we believe that some of the features touted as noise-mitigation measures will offer very little – or even no – relief to the neighbors in practice. We address each of these features individually as follows:

a) Drive-Through Location

Kaidence appears to have focused on the ordering point and speaker box as the primary drive-through noise source. So, by locating the speaker box close to the eastern property line, they reason that the Project design is minimizing noise impact on the neighbors.

However, in reality, the speaker box is not the main source of drive-through noise. It is the vehicles themselves that will like produce the most noise (engines, horns, doors slamming, music being played in vehicles, delivery trucks, etc.) and these vehicles will not be confined to that portion of the drive-through that is closest to the eastern property line. In fact, moving, parked and parking vehicles will be generating noise all over the project site – including close to the western property line and the neighboring homes. So this feature does little to mitigate vehicle/traffic noise impacts on the homes.

b) Speaker Box, Volume Control

As discussed in the previous paragraphs, the speaker box is not the main noise concern with the proposed drive-through. It may be true that the automatic volume control prevents loudspeaker noise from being heard beyond the property line (this is also one of the ZA's conditions) but this does nothing to mitigate noise impacts from vehicles/traffic.

c) Vehicles as Noise Barriers

Again, this feature seems to assume that the speaker box is the main noise concern so that vehicles situated between the ordering point and the western property line might help block that noise. In fact, these vehicles (whether queuing in the drive-through itself or elsewhere on the site) are a source of noise in their own right – much more significant than the ordering speaker box – and yet are not addressed as such in the Kaidence findings.



d) New 6-foot High Wall

The true value of the proposed 6-foot wall is also questionable – because no calculations are provided in the Kaidence findings to show how much reduction it will provide and what the net levels of noise will be at the nearby homes. The house closest to the project site is slightly elevated and – even with the existing vinyl fence – there are clear lines-of-sight between the windows and the drive-through, speaker box, pickup window, etc.; so the proposed new 6-foot wall will do nothing to reduce noise received at this location.

e) The Alley as a Mitigating Feature

The alleyway to the west is an existing part of the neighborhood rather than a design feature of the Project. And, while the alley does provide a little additional distance between the proposed noise sources on the Project site and the homes that front onto Victory Boulevard, there is no analysis in the Kaidence findings to show how much noise attenuation is achieved by that extra distance. Also, the residential property to the northwest shares a property line with the Project site – there is no alley here.

f) Landscaping

It is simply not true that the proposed landscaping will act as a barrier to noise. It would take a deep (50 to 100-feet), continuous band of densely-planted trees to provide any meaningful reduction in noise. The handful of trees scattered around the site – as shown on the landscaping plan – will provide no noise reduction benefit at all to the neighboring homes.

Yours sincerely,

Steve Rogers Acoustics, LLC

A handwritten signature in blue ink that reads "Steve Rogers".

Steve Rogers
Principal

Channel Law Group, LLP

February 2, 2026

Supplemental Justification for Appeal of Case No. ZA-2024-5222-CU2-ZBA,
Conditional Use Permit and Zone Boundary Adjustment, and ENV Case No.
2024-5223-CE, 23717 Victory Boulevard (Proposed Starbucks Drive-Through)

EXHIBIT 2

Table A: 23717 Victory Blvd Project Trip Generation (Fast-Food Pass-By)

Land Use	Size	Unit	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Trip Rates ¹									
Coffee Shop with Drive-Through		tsf	533.57	43.80	42.08	85.88	19.50	19.49	38.99
Fast Casual Restaurant		tsf	97.14	0.72	0.71	1.43	6.90	5.65	12.55
Project Trip Generation									
Coffee Shop with Drive-Through	1.479	tsf	789	65	62	127	29	29	58
Pass-By Reductions ²			(391)	(32)	(30)	(62)	(15)	(14)	(29)
Total			398	33	32	65	14	15	29
Existing Trip Generation									
Fast Casual Restaurant	2.135	tsf	207	2	1	3	15	12	27
Net Trip Generation (Project - Existing)			191	31	31	62	(1)	3	2

¹ Trip rates referenced from the Institute of Transportation Engineers (ITE) *Trip Generation* Manual, 11th Edition (2021).

Land Use Code 937 - Coffee/Donut Shop with Drive-Through Window

Land Use Code 933 - Fast Casual Restaurant

² Pass-by reductions referenced from the ITE *Trip Generation* Handbook, 3rd Edition (2017).

49.5% Daily, 49% AM, and 50% PM Pass-By assumed for the project (Land Use Code 934 - Fast-Food Restaurant with Drive-Through Window).

tsf = thousand square feet

Channel Law Group, LLP

February 2, 2026

Supplemental Justification for Appeal of Case No. ZA-2024-5222-CU2-ZBA,
Conditional Use Permit and Zone Boundary Adjustment, and ENV Case No.
2024-5223-CE, 23717 Victory Boulevard (Proposed Starbucks Drive-Through)

EXHIBIT 3

**CANOGA PARK-WINNETKA-
WOODLAND HILLS-WEST HILLS**

Community Plan

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CANOGA PARK-WINNETKA- WOODLAND HILLS-WEST HILLS

Community Plan

Chapter I INTRODUCTION

COMMUNITY BACKGROUND

PLAN AREA

The Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan Area is in the southwest San Fernando Valley. The Community Plan Area covers 17,887 acres -- approximately 6 percent of the land in the City of Los Angeles. Planning communities that border this CPA are Chatsworth-Porter Ranch, Reseda-West Van Nuys, Encino-Tarzana, the Cities of Hidden Hills and Calabasas, and portions of Los Angeles and Ventura Counties.

A diverse natural and socioeconomic landscape characterize this Community Plan Area. Dominant on the natural landscape are the Simi Hills of West Hills, the hillsides of the Santa Monica Mountains and the Chalk Hills of Woodland Hills, and the valley plain in Canoga Park and Winnetka. Initially an agricultural cattle oriented community, the area has undergone substantial residential and commercial development over the last fifty years. As agriculture gave way to industry, the aerospace industry transformed the Community Plan Area. Today the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan Area offers a diverse range of housing opportunities and is the economic hub of the San Fernando Valley.

The Community Plan Area consists of four community subareas, each with a distinct identity.

Canoga Park

Settled early this century, Canoga Park is the heart of the West San Fernando Valley. Located within the boundaries of Roscoe Boulevard to the north, south to Victory Boulevard, Fallbrook Avenue to the West and De Soto Avenue to the east, this area contains a diversity of housing and commercial activity. The traditional main street commercial corridor is being reestablished as a community hub for cultural and social activities.

Woodland Hills

This subarea lies in the southern portion of the Community Plan Area. The boundaries run generally along Victory Avenue from Corbin Street to Topanga Canyon Boulevard, Topanga Canyon Boulevard to US 101, US 101 Freeway west to the City limits, and the Santa Monica Mountains on the south. This subarea contains a variety of predominantly single family homes and is home to Pierce College and Warner Center.

West Hills

This primarily single-family neighborhood is bound by Roscoe Boulevard to the north, Topanga Canyon Boulevard on the east, the Ventura Freeway to the South, and the Simi Hills on the South and Southwest.

Winnetka

One of the earliest subareas to be settled, this community is bound by Roscoe Boulevard on the north, Corbin Avenue on the east, Victory Boulevard on the South, and De Soto Avenue on the West.

Specific Plans

The Ventura/Cahuenga Boulevard Corridor, Warner Center and Mulholland Scenic Parkway Specific Plans address the unique opportunities and challenges associated with commercial and residential development within the Canoga Park-Winnetka-Woodland Hills-West Hills plan area.

Ventura/Cahuenga Boulevard Corridor Specific Plan

The goals of the Ventura/ Cahuenga Boulevard Corridor Specific Plan are to assure an equilibrium between transportation infrastructure and land use development. The Specific Plan provides for an effective local circulation system; promotes attractive and harmonious site design for commercial development; provides compatible and harmonious relationships between commercial and residential areas when adjacent to each other; promotes and encourages development of pedestrian activity; and maintains the distinct character of each of the five Specific Plan communities located within its boundaries.

Mulholland Scenic Parkway Specific Plan

The goals of the Mulholland Scenic Parkway Specific plan are to assure maximum preservation and enhancement of the parkways's outstanding and unique scenic features and resources. The Specific Plan assures that design and placement of buildings and other improvements preserve, complement and/or enhance views; minimizes grading and assures that graded slopes have a natural appearance. Additionally, the plan seeks to preserve the natural appearance compatible with the characteristics of the Santa Monica Mountains; to protect prominent ridges, trees and environmentally sensitive areas; and protect all identified archaeological and paleontological resources.

Warner Center Specific Plan

The Goals of the Warner Center Specific Plan are to coordinate orderly commercial and residential development with transportation improvements. The Specific Plan protects residential neighborhoods from the intrusion of through traffic, establishes a hierarchy of land use intensity which decreases with distance away from the Warner Center Core, encourages mixed-use development within Warner Center in accordance with the city's goal to improve the jobs/housing relationship.

The purpose of the Specific Plan is to make Warner Center a vibrant environment, providing daytime and nighttime activities; preserve existing high technology industrial and research uses, encourage opportunities to stimulate human interaction and pedestrian activity.

The Specific Plan does this through establishment of urban design, landscaping and sign control standards to insure that the high quality of development in Warner Center is maintained; encourage art work in public spaces; and provide child care facilities for the employees of Warner Center businesses.

COMMUNITY PARTICIPATION

The State of California requires citizen participation in the preparation or amendment of community plans. General Plan Government Code Section 65351 reads, "During the preparation or amendment of the general plan the planning agency shall provide opportunities for the involvement of citizens, public agencies, public utility companies, civic, education, and other community groups through public hearings and any other means the city or county deems appropriate."

Drafting of the first community plan involved members of the community who helped to identify and define the needs, desires, resources, and the unique nature of the community. Subsequent changes in the plan have served to broaden the community participation that took place with the formation of the original plan. Community participation helps to update the plan by identifying changes that have taken place since its adoption.

COMMUNITY ISSUES AND OPPORTUNITIES

The following summarizes the most significant planning and land use issues and opportunities identified in the Canoga Park - Winnetka - Woodland Hills - West Hills Community Plan Area:

RESIDENTIAL

Issues

- Need to preserve existing single family neighborhoods.
- Cumulative effects if permitted development exceeds infrastructure capacity.
- Need for more affordable senior housing.

- Compatibility between residential and industrial uses.
- Blighting impact of vacant and obsolete commercial development on adjacent residential neighborhoods.
- Preservation of single-family housing stock in older residential neighborhoods.
- Lack of open space in apartment projects.

Opportunities

- Support efforts of active homeowners groups working to promote identification, preservation and rehabilitation of local neighborhoods.
- Use land use policies to support ongoing affordable home-ownership and rehabilitation programs in older single family neighborhoods.
- Maintain the diversity of housing opportunities that exists in the CPA.
- Encourage residential and mixed use development along commercial corridors.
- Maintain access and proximity to employment.

COMMERCIAL

Issues

- Oversupply and poor appearance of strip mall development and obsolete commercial space on major thoroughfares.
- Lack of overall parking and access within commercial strips due to physical constraints such as shallow commercial lot depths.
- Unsightliness of new construction due to the lack of landscaping, architectural character and scale.
- Inadequate transition between commercial and residential uses.

Opportunities

- Promote the character, economic viability, and quality of existing and new commercial development through design guidelines.
- Establish appropriate transition between commercial (mixed use) and adjoining, primarily residential, uses.
- Create pedestrian/friendly shopping areas by incorporating street trees, benches, convenient parking/access, and maintaining retail frontage at ground level.
- Improve physical appearance of commercial districts and reduce scale of commercial development adjacent to residential neighborhoods.

- Complement any unique existing development/uses to reinforce desirable design characteristics and uses.

INDUSTRIAL

Issues

- Ⓒ No separation exists between industrial uses and residential neighborhoods in many older parts of the Community Plan Area.
- The viability of older industrial districts is challenged by changing site and location requirements of modern industrial uses.
- Contraction of industrial sectors important to the west valley, such as aerospace, has led to a loss of local manufacturing jobs and the need to find new industrial uses.

Opportunities

- Ⓒ Excellent access to regional freeways and rail services.
- Availability of industrial sites within Warner Center to meet the location and site specifications of clean modern industrial users.
- Apply strategies traditionally used in commercial districts to revitalize older industrial districts. Such strategies may include establishment of business improvement districts and design guidelines.
- Ⓒ Encourage recycling of unused industrial sites by uses linked to expanding sectors of the regions economy.
- Increasing presence of desirable (“clean”) industrial uses, thus generating less harmful pollutants and lower noise levels.
- Use of appropriate administrative review for major expansions of existing industrial sites when located near residential uses.
- Availability of sites planned for job producing uses that improve the economic and physical condition of the area.

TRANSPORTATION

Issues

- Ⓒ The Community Area is poorly served by Public Transportation.
- Ⓒ Generalized congestion exists in many parts of the Community Plan Area.
- Ⓒ Traffic speed and/or volume compromises safety and quality of many residential neighborhoods and some commercial areas.
- Ⓒ Ahmanson Ranch development use of Victory Boulevard may adversely impact CPA traffic, particularly on Valley Circle Boulevard.

Opportunities

- Ⓒ MTA Right-Of-Way offers the opportunity for a variety of public transportation improvements including light rail, busways, and pedestrian/bike trails.
- Ⓒ Expanded use of the “Smart Bus” or Dash lines in CPA can relieve traffic congestion and provide residential service to commercial centers.
- Ⓒ Traffic calming measures in residential areas and in pedestrian oriented commercial areas may improve neighborhood quality.

RECREATION, PARKS, AND OPEN SPACE

Issues

- Ⓒ Addition, expansion and/or improvement of needed local parks throughout the Community should be accelerated, where feasible.
- Continued development of Equestrian, Hiking and Bicycle Trails.

Opportunities

- Ⓒ Continued efforts to establish State and local park sites within the hillside areas.

MAJOR DEVELOPMENT OPPORTUNITY SITES

Several areas have been identified as major opportunity sites:

Gateway To The City

Since 1972, the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan has included the “Gateway To The City” concept. This concept initially envisioned a commercial development where the U.S. 101 freeway enters the valley. This entrance is framed by the Santa Monica Mountains and the Simi Hills and offers a panoramic vista of the San Fernando Valley.

Today, the Gateway to the Valley is Warner Center. Warner Center is a preeminent center for commerce, cultural, and civic life at the entrance to the San Fernando Valley. Below is a summary of major issues that should be considered with regard to continuation of the Gateway to the City concept:

Issues

- Ⓒ Scenic vistas should be preserved at entrance of U.S. 101 freeway into the San Fernando Valley.
- Ⓒ Gateway related development shall be within Warner Center.

Opportunities

- Ⓒ Enhance entrance to City by preservation of scenic vista.
- Ⓒ Identify Warner Center as the Commercial Gateway to the San Fernando

Valley and the City and promote commercial districts along Ventura Boulevard, parallel to the U.S 101.

Pierce College Agricultural Land

The Los Angeles Pierce College is an important part of the Community Plan Area's History. Its agricultural program is one of the few remaining connections to the community's agrarian past. A legacy of this program is preservation of a sizable and environmentally important piece of publicly held open space. Potential development of this site could occur due to fiscal pressures and changing priorities of the Los Angeles Community College District.

The following is a summary of major issues that should be considered for any future development of this site.

Issues

- C Open Space portion of Pierce College is an environmentally sensitive resource.
- C Current use of land is an important educational resource for the Community Plan Area.
- C The Community Area is well served by existing commercial land. No new commercial land is needed for the life of this Community Plan. Adequate commercial land exists in Warner Center and in nearby Community Commercial Centers.

Opportunities

- C Pierce College represents a rare opportunity to preserve a significant, publicly held Open Space.
- C Master Plan for Pierce College Campus may provide opportunity to integrate future use of this site with needs of the community.

MTA Right-Of-Way

The former Southern Pacific Railway ROW, now owned by MTA, is an important development opportunity for the community. Among potential uses are public transportation in the form of light rail or busways, recreational uses in the form of bike/walking/equestrian trails, or opportunities for industrial development where it runs contiguous to existing industrial areas.

Issues

- C Future rail development of this property is uncertain. Alternative uses for this property should maintain potential rail ROW.
- C Poor maintenance in absence of active use.

Opportunities

- C Potential to connect bikeways with those to the eastern end of the valley.
- C Possibility of use for busways.
- C Opportunities to provide increased parking or development opportunities for adjacent commercial and industrial uses.

Treeland Nursery

The site of the Treeland Nursery, the northwest corner of Valley Circle and Long Valley Road, is of a size and configuration to accommodate substantial commercial development. Currently land use on the site is divided between General Commercial and Very Low Residential land use. A footnote will be placed on the site requiring any commercial zone change to include a [Q] condition limiting the Floor Area Ratio to 0.5:1, a thirty foot height limit, and uses limited to those first permitted in the C1.5 zone, and requiring a minimum 25 foot setback from any residential property. The limited Floor Area Ratio is consistent with commercial zoning for all properties with Neighborhood or general commercial designations.

Below is a summary of issues and opportunities to be considered in any development proposal for that portion of the site currently designated for General Commercial uses or for any future expansion of the General Commercial designation on the remaining portion of the Treeland property:

Issues

- C The Treeland Nursery Site is in a predominantly residential area. Development must be compatible with residential character of the area.
- C Scenic vistas that characterize the location need to be preserved.
- C Existing access off Long Valley Road provides unacceptable primary access for any major commercial development of the site. Secondary access shall be considered only after traffic study completed by the Los Angeles Department of Transportation as part of any discretionary review for the subject property.
- C The location is well served by Community Commercial activity at the El Camino Shopping Center and along Ventura Boulevard.

Opportunities

- C Ensure environmentally sensitive design and compatibility with adjacent residential areas through development standards. These standards shall include:
 - a. Limit Floor Area Ratio to .5:1.
 - b. Require adequate buffers between commercial activity and residential neighbors.

- c. Attractive landscaping throughout the site.
 - d. A maximum height limit of 30 feet for all structures developed on the property.
- C Commercial uses on this property shall be limited to those first permitted in the C1.5 zone.
 - C Approval of any commercial zone on the subject property shall include an equestrian trail easement to the trail backbone of the Santa Monica Mountains Conservancy Trail System.

Canoga Park Industrial Corridor

This industrial corridor extends from Vanowen Street to Roscoe Boulevard and rests between Canoga Boulevard and Deering Avenue. Initially developed by rail oriented industries, the corridor runs parallel to the former Southern Pacific Railway, this industrial corridor is a traditional source of employment in the Community Plan Area. While still predominantly industrial, this corridor is in a period of transition and opportunities for recycling exist. Policies and programs to promote clean industrial uses such as light assembly, research, and subcontracting specialties related to the motion picture industry should be promoted.

Issues

- C Proximity to residential properties
- C Poor maintenance, unsightly appearance and dilapidated condition of structures.
- C Proliferation of low-end uses such as auto repair establishments.

Opportunities

- C Access and proximity to employment for local residents.
- C Existing internal circulation system.
- C Potential for expansion on former rail easement.
- C Use of traditional commercial revitalization tools such as Business Improvement Districts and Design Guidelines to improve district aesthetics and attract clean manufacturing uses.

NEIGHBORHOOD CHARACTER

Preserve and enhance the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks and appearance.

Issues

- C Scale, density and character of multiple dwelling housing adjacent to single-family homes.
- C Scale, density and character of strip mall and neighborhood commercial development adjacent to residential areas.
- C Impact on street parking from new high density apartments.
- C The need to preserve and rehabilitate historic areas with a sensitivity to the character of the established neighborhood.

Opportunities

- C Development of design guidelines for commercial and industrial areas adjacent to residential neighborhoods.
- C Appropriately scaled commercial development in neighborhood commercial centers.
- C Inclusion of mixed use development in commercial areas adjacent to transit station stops.

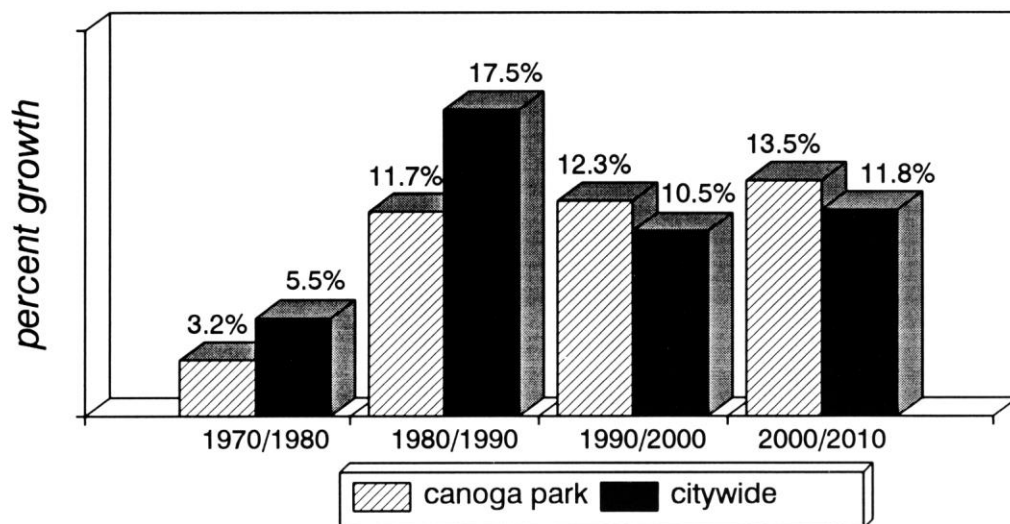
COMMUNITY PROFILE

The Community Profile provides an overview of population, housing, and socio/demo-graphics for the Canoga Park - Winnetka - Woodland Hills - West Hills Community Plan Area and compares it to the rest of the City. The following tables contain the statistical data for previous census dates and rates of growth.

CANOGA PARK/WEST HILLS/WINNETKA/WOODLAND HILLS COMMUNITY PROFILE

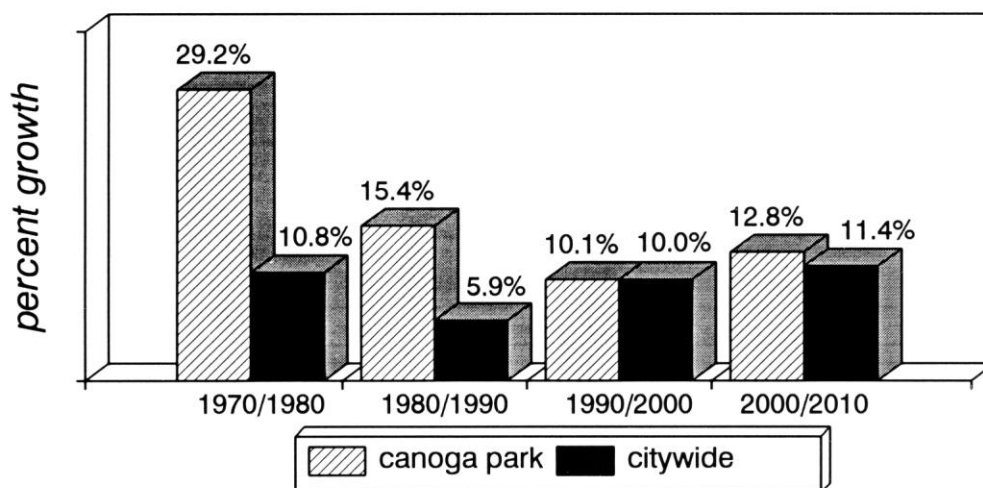
	estimated data (from U.S. Census)			projections (from SCAG) *	
total population	1970	1980	1990	2000	2010
canoga park	130694	134844	150560	169109	191892
citywide	2811801	2966850	3485398	3852993	4306564
growth rate		1970 to 1980	1980 to 1990	1990 to 2000	2000 to 2010
canoga park		3.2%	11.7%	12.3%	13.5%
citywide		5.5%	17.5%	10.5%	11.8%

population growth rate comparison
(includes group quarters population) **



	1970	1980	1990	2000	2010
total households					
canoga park	37311	48206	55643	61260	69079
citywide	1024873	1135491	1203052	1323882	1474514
growth rate		1970 to 1980	1980 to 1990	1990 to 2000	2000 to 2010
canoga park		29.2%	15.4%	10.1%	12.8%
citywide		10.8%	5.9%	10.0%	11.4%

household growth rate comparison
(occupied dwelling units only)



* Southern California Association of Governments; a regional council of county and municipal governments that includes Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties.

** Population in group quarters includes institutionalized individuals, students in dormitories, and persons in emergency shelters, migrant worker housing, halfway houses, nursing homes, military quarters, etc.

CANOGA PARK – COMMUNITY PROFILE

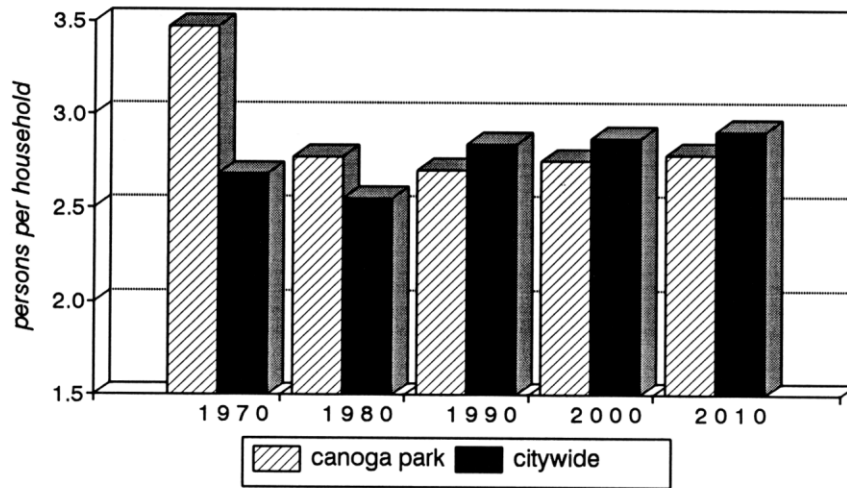
estimated data (from U.S. Census)

projections (from SCAG)

household size
(persons per dwelling unit) *

	1970	1980	1990	2000	2010
canoga park	3.47	2.77	2.70	2.75	2.78
citywide	2.68	2.55	2.84	2.87	2.91

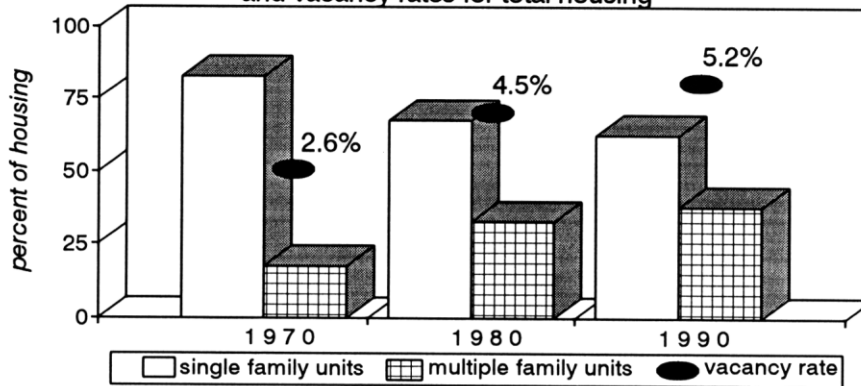
household size comparison



housing splits / vacancy factors **
(canoga park only)

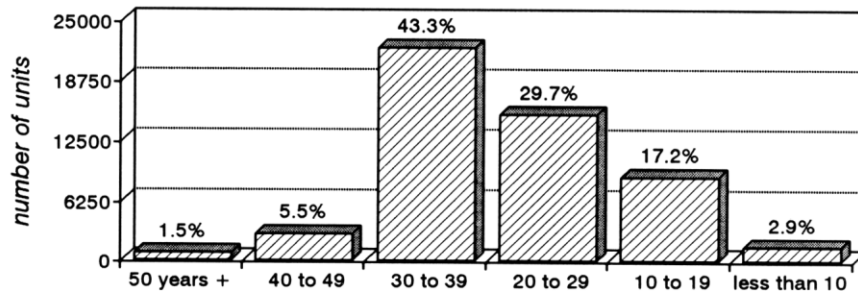
	1970	1980	1990
single family dwellings	82%	68%	62%
multiple family dwellings	18%	32%	38%
vacancy rate (total housing)	2.6%	4.5%	5.2%

single family dwelling units, multiple family dwelling units,
and vacancy rates for total housing



age of housing as of 1994 ***
total dwellings in
canoga park
(includes vacant and occupied units).

age of housing



* Count of all persons in occupied dwellings. Does not include group quarters population.

** Housing splits are defined by the presence of a common wall between two or more dwelling units. Typical multiple family units include condominiums and apartments. Typical single family units include detached structures.

*** Source of this information is the Los Angeles County Assessor. Data derived from the Assessors LUPAMS (Land Use Planning and Management Subsystem) file. File date is mid 1994.

CANOGA PARK – COMMUNITY PROFILE

HOUSING and OCCUPANCY FACTORS

1990 census data;

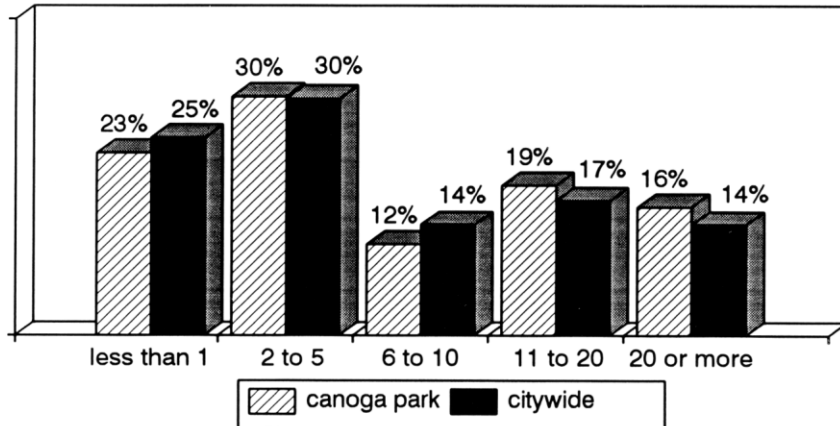
<u>cost of housing (as a percent of income) *</u>	20% or less	20% to 29%	30% or more
owner occupied housing units	43.6%	21.6%	34.8%
renter occupied housing units	23.3%	24.0%	52.7%

<u>cost of housing (owner occupied units)</u> (value estimated by owner)	under \$100,000	\$100,000 to \$200,000	\$200,000 to \$300,000	\$300,000 to \$500,000	\$500,000 or more
canoga park	1.4%	11.7%	41.8%	34.7%	10.4%
citywide	8.4%	28.5%	25.9%	21.4%	15.8%

<u>cost of housing (renter occupied units)</u> (monthly cost estimated by resident)	under \$300	\$300 to \$500	\$500 to \$750	\$750 to \$1,000	\$1,000 or more
canoga park	3.3%	11.6%	41.2%	24.2%	19.7%
citywide	10.9%	29.9%	38.3%	13.1%	7.9%

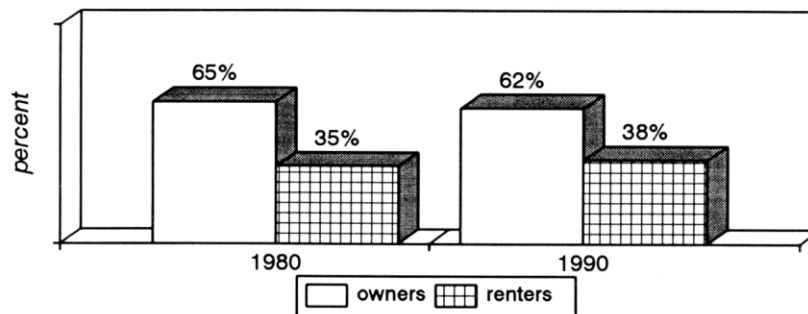
<u>stability indicator (percent) **</u> (length of time in the community)	less than 1 year	2 to 5 years	6 to 10 years	11 to 20 years	20 years or more
canoga park	23.1%	30.2%	11.5%	18.9%	16.3%
citywide	25.1%	30.3%	13.7%	16.9%	14.1%

years at same address



residential tenure (ownership status)

owners/renters 1980 and 1990



NOTE: All information included on this sheet calculated on basis of householders response to census questionnaire.
 * Sums to 100% by type of housing. This is a distributed calculation of all householders who responded to census questions about cost of housing. Approximately 90% of all householders responded.
 ** Describes length of time living at the same location. Owners and renters combined.

CANOGA PARK – COMMUNITY PROFILE SOCIO/DEMOGRAPHICS

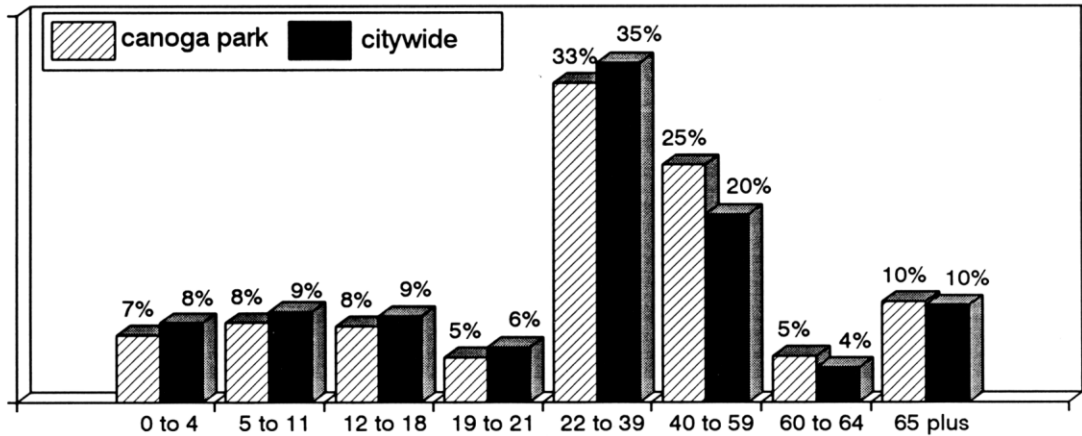
1990 census data;

<u>employment (percent) *</u>	
females employed	43.8%
males employed	56.2%
employment participation rate	72.7%
(citywide rate)	67.3%

<u>household income (1989) **</u>	
average (citywide)	\$59,746
poverty (percent)	6.9%
(citywide)	18.9%

<u>education (percent) ***</u>	high school	beyond high school	college graduate
canoga park	83.9%	62.8%	30.1%
citywide	67.0%	47.8%	23.0%

age of the general population

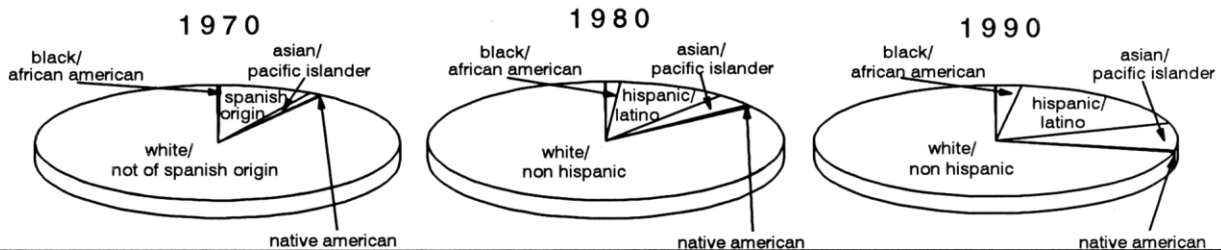


<u>language and citizenship (percent) ****</u>	foreign language spoken at home			foreign born
	spanish	asian	other language	
canoga park	14.0%	5.5%	10.1%	29.8%
citywide	24.3%	6.0%	5.6%	44.9%

<u>means of transportation to work (percent) *****</u>	drive alone	vanpool/ carpool	public transit	other means
	canoga park	77.2%	12.7%	2.3%
citywide	65.2%	15.4%	10.5%	10.5%

<u>head of household *****</u>	live alone	married with children	married no children	single parent	single non family
	canoga park	24.8%	27.0%	32.2%	7.4%
citywide	31.0%	24.3%	22.0%	12.7%	10.0%

<u>race/ethnicity (percent) *****</u>	1970	1980	1990
asian/pacific islander	1.1%	3.5%	8.2%
black/african american	0.1%	1.3%	2.3%
hispanic/latino	8.2%	9.9%	17.8%
native american	0.2%	0.5%	0.3%
white-non hispanic	90.3%	84.8%	71.4%



NOTE: All information included on this sheet calculated on basis of householders response to census questionnaire.

* Civilian persons 16 years or older. Employment participation measures only persons eligible to work; therefore, students, retirees, housewives, military personnel, etc. are not included in this calculation.

** See the note above. Poverty is calculated on the basis of all persons surveyed (98% of citywide population).

*** Only persons 25 years or older are included in this calculation.

**** Persons 5 years or older (except for foreign born which excludes anyone under the age of 18).

***** Total workers 16 years of age or older. Includes military personnel.

***** Adult person acknowledged as representing the household in response to census questionnaire. Household may consist of any number of persons or families.

***** Census definition of hispanic/latino persons changed after 1970. Previously described as "spanish origin".

Chapter II

FUNCTION OF THE COMMUNITY PLAN

Chapter 2 of the Plan Text contains the statutory requirements for the Community Plan outlining the mandatory elements that must be addressed. The Chapter contains the explanations of the Role, Purpose, and Organization of the Community Plan. Chapter 2 shows the relationship to other General Plan elements and provides for Plan Monitoring and Consistency.

STATUTORY REQUIREMENTS

California State Law (Government Code Section 65300) requires that each city prepare and adopt a comprehensive, long-term general plan for its development. It must contain seven mandatory elements including land use, circulation, housing, conservation, open space, noise, and safety. California State law requires that the Land Use Element be prepared as part of the city's General Plan, and that it correlate with the Circulation Element. In the City of Los Angeles thirty-five community plans comprise the City's Land Use Element.

The Land Use Element has the broadest scope of the State required General Plan elements, since it regulates how land is to be utilized. It correlates to many of the issues and policies contained in all other plan elements.

Government Code Section 65302(a) requires a land use element to designate the proposed general distribution, general location, and extent of uses of the land for housing, business, industry, open space (including agriculture, natural resources, recreation and enjoyment of scenic beauty), education, public buildings and grounds, solid waste disposal facilities, and other categories of public and private uses of land. The Land Use Element shall include a statement of the standards of population density and building intensity recommended for the various communities and other territory covered by the plan.

The Canoga Park - Winnetka - Woodland Hills - West Hills Community Plan is a part of the General Plan of the City of Los Angeles. It consists of this text and the accompanying map. The Community Plan text states the goals, objectives, policies, and programs. The Community Plan Map, footnotes and legend outline the arrangement and intensities of land uses, the street system, and the locations and characteristics of public service facilities.

ROLE OF THE COMMUNITY PLAN

The General Plan is the fundamental policy document of the City of Los Angeles. It defines the framework by which the City's physical and economic resources are to be managed and used over time. The Plan guides decisions regarding land use, building design and character, open space, housing

conservation and development, provision of supporting infrastructure and public and human services, protection of environmental resources, and protection of residents from natural and man-caused hazards.

The intent of the Community plan is promotion of an arrangement of land uses, streets, and services which will encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the people who live and work in the community. The plan also guides development to create a healthful and pleasant environment. Goals, objectives, policies, and programs are created to meet the existing and future needs and desires of the community through the year 2010. The general plan clarifies and articulates the City's intentions with respect to the rights and expectations of the public, property owners, prospective investors and business interests. Through the Community Plan, the City can inform these groups of its goals, policies, and development standards, thereby communicating what is expected of the City government and private sector to meet its objectives.

The Community Plan ensures that sufficient land is designated to provide for the housing, commercial, employment, education, recreational, cultural, social, and aesthetic needs of the residents of the plan area. The Plan identifies and provides for the maintenance of any significant environmental resources within the Plan Area. The Plan also seeks to enhance community identity and recognizes unique neighborhoods within the Plan area.

PURPOSE OF THE COMMUNITY PLAN

The last comprehensive update of the Canoga Park - Winnetka - Woodland Hills - West Hills Community Plan was completed in 1984 and later revised through the General Plan Zoning Consistency Program required by AB283 in 1987, and through on-going Periodic Plan Review and other Plan amendments. In the past 20 years, the community has shown a growth rate lower than the overall rate for the city. During the 1970's, community population increased by 4,150 residents, an increase of 3.2%. Since 1980, the community's population has grown by 15,716 residents-- an increase of 11.7%.

This update of the Community Plan reflects current conditions and the prevailing visions and objectives of the area's residents, property and business owners.

ORGANIZATION AND CONTENT OF THE COMMUNITY PLAN

This Plan sets forth goals, objectives, policies, and programs for the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan Area. Broader issues, goals, objectives, and policies are provided by the Citywide General Plan Framework.

The Plan is organized and formatted to simplify periodic updates. The State recommends that the entire plan be comprehensively reviewed every five years to reflect new conditions, local attitudes, and technological advances.

The principal method for the implementation of the Land Use Map is the Zoning Ordinance. The City's Zoning Map must be updated to remain consistent with the adopted Land Use Map. Together, the Zoning Ordinance and the Zoning Map will identify specific types of land use, intensity of use and development standards applicable to specific areas and parcels of land within the community.

RELATIONSHIP TO OTHER GENERAL PLAN ELEMENTS

The City of Los Angeles has the responsibility to maintain and implement the City's General Plan. Since State Law requires that the General Plan have internal consistency, the Canoga Park - Winnetka - Woodland Hills - West Hills Community Plan must be consistent with other Elements and components of the General Plan.

The Citywide General Plan Framework is the umbrella concept of the General Plan that will provide the overall guiding vision for Los Angeles into the 21st century. It is based on a directed growth strategy that targets residential and commercial growth along boulevards and corridors and clustered development around community focal points and high activity centers. The General Plan Framework is a special element of the General Plan which looks to the future as required by law and replaces the Centers concept, which was adopted by the City Council in 1974, as the City's long-range development strategy.

The Citywide General Plan Framework Element neither overrides nor supersedes the Community Plans. It guides the city's long range growth and development policy, establishing citywide standards, goals, policies, and objectives for citywide elements and community plans. The Framework is flexible, suggesting a range for uses within its land use definitions. Precise determinations are made in the Community Plans.

The General Plan Framework provides the following projections for year 2010 population, housing and employment levels for the Canoga Park - Winnetka - Woodland Hills - West Hills Community Plan Area:

<i>Population (2010) projection:</i>	191,892
<i>Employment (2010) projection:</i>	142,400
<i>Housing (2010) projection:</i>	87,187

The above population, employment and housing numbers are provided as reference during the Community Plan update. These figures are estimates derived from regional data that are then disaggregated to the City and community levels. Population, jobs and housing could grow more quickly, or slowly, than anticipated depending on economic trends.

Regional forecasts do not always reflect the adopted community plan land use capacity or buildout estimated from planned land use. Plan capacity or build out is also an estimate based on specific assumptions regarding development density and household size. Actual plan build out may be more or less than estimated. It should be noted that community plan capacity does not include housing in commercial districts nor the current residential

vacancy rate. The Community Plan includes appropriate policies and implementation measures generated from the mitigation measures listed in the environmental clearance.

In addition to the seven State-mandated elements, the City's General plan includes a General Plan Framework Element, a Public Facilities an Historical Preservation/Cultural Resources element, and an Air Quality Element. All provisions and requirements of the General Plan elements apply to the Canoga Park - Winnetka - Woodland Hills - West Hills Community Plan.

Neighborhood plans involve the preparation of special plans that blend both policy and implementation functions for unique neighborhoods within a community. Besides these neighborhood plans, overlay zones also combine policy and implementation functions to address issues peculiar to a specific neighborhood.

The Community Plan includes appropriate policies and implementation measures generated from the mitigation measures listed in the environmental clearance. In Many instances these measures encompass the policies contained in the General Plan Framework.

PLAN CONSISTENCY

Each plan land use category shows the corresponding zones permitted by the Plan. However, development may be further restricted by the Plan text, footnotes, adopted Specific Plans or other specific limitations on discretionary approvals. The Plan recognizes that the residential densities, commercial intensities and industrial intensities depicted on the Plan Map are theoretical and will not occur due to plan and zone regulations, economic conditions, and design limitations.

For each plan category, the Plan permits all identified corresponding zones, and those zones that are more restrictive, as referenced in Section 12.23 of the Los Angeles Municipal Code (LAMC). Any subsequent action that modifies the Plan or any monitoring review that results in changes to the Plan must make new Plan consistency findings at the time of the decision.

City actions on most discretionary projects require a finding that the action be consistent or in conformance with the General Plan. In addition to the required general finding, decision-makers acting on certain projects in the Canoga Park - Winnetka - Woodland Hills - West Hills Community Plan Area shall refer to each of the applicable additional findings that the Plan identifies as programs, policies or objectives in Chapter III of the Plans which are underlined for ease of reference. To further substantiate the consistency findings, decision makers may site other programs, policies, or objectives which would be furthered by the proposed project. In addition, Chapter V of the Plan requires a decision maker to make a finding of conformance with applicable design standards for discretionary projects.

PLAN MONITORING

The Plan has a land use capacity greater than the projected development likely to occur during the Plan period. During the life of the Plan, growth will be monitored and reported in the City's Annual Report on Growth and Infrastructure which will be submitted to the City Planning Commission, Mayor, and City Council. In the fifth year following Plan adoption (and every

five years thereafter), the Director shall report to the Commission on the relationship between population, employment, housing growth and plan capacities. If growth has occurred faster than projected, a revised environmental analysis will be prepared and appropriate changes recommended to the Community Plan and zoning. These Plan and zoning changes and any related moratorium or interim control ordinances, shall be submitted to the Planning Commission, Mayor, and City Council as specified in the Los Angeles Municipal Code.

Chapter III

LAND USE POLICIES AND PROGRAMS

Chapter 3 of the Plan Text Contains Land Use Planning Goals, Objectives, Policies, and Programs. Organized by land use category, this section is divided into residential, commercial, and industrial land use and public and institutional service system categories. The Planning Department is responsible for the goals, objectives, policies, initiation and direct implementation of the programs contained in Chapter 3.

RESIDENTIAL

The quality of life and stability of neighborhoods throughout Canoga Park-Winnetka-Woodland Hills-West Hills depends on providing infrastructure resources (i.e.: police, fire, water, sewerage, parks, traffic circulation, etc.) commensurate with the needs of its population. If population growth occurs faster than projected and without needed infrastructure improvements to keep pace with that growth, the consequences for livability within the Community Plan Area could be problematic.

Accordingly, the proposed Plan has three fundamental premises. First, is limiting single family residential densities in various neighborhoods to the prevailing density of development in these neighborhoods. Second, is the monitoring of population growth and infrastructure improvements through the City's Annual Report on Growth and Infrastructure with a report to the City

Planning Commission every five years on the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan following Plan adoption. Third, if this monitoring finds that population in the Plan area is occurring faster than projected; and that infrastructure resource capacities are threatened, particularly critical resources such as water and sewerage; and that there is not a clear commitment to at least begin the necessary improvements within twelve months; then building controls should be put into effect, for all or portions of the Canoga Park-Winnetka-Woodland Hills - West Hills, until land use designations for the Community Plan and corresponding zoning are revised to limit development.

Existing residential land use patterns vary greatly according to local conditions in the neighborhoods and communities which comprise the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan. Topography, population characteristics, housing markets, location of employment centers, and transportation infrastructure have great influence on the type, location and density of development throughout the community.

The Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan Area offers a diversity of housing opportunities and strong neighborhoods. Predominantly single family in nature, housing opportunities exist for a wide range of incomes. Historically, the majority of the area has been planned for residential purposes. Therefore, current plan policy provides for continued preservation of the existing residential neighborhoods throughout the area, retaining existing single family districts and multi-family clusters. The Plan designates residential land use densities as indicated in the

following table. The Table depicts the reasonable expected population and dwelling unit count for the year 2010, using the mid-point of the range for the dwelling units per net acre category. The midpoint represents a reasonable factor to use, as new development within each land use category is not likely to occur at one of the other extremes of the range but rather throughout the entire range.

PLAN POPULATION AND DWELLING UNIT CAPACITY

Residential Land Use Category	Dwelling Units Per Net Acre Midpoint	Number of Dwelling Units	Net Acres	Persons Per Dwelling Unit (2010)	Reasonable Exp. Population
Minimum	0.5 (0 - 1)	499.68	999.36	3.03	1,514.04
Very Low	2.5 (1+ to 4)	13,618.00	3,438.96	3.03	26,050.14
Low	6.5 (4+ to 9)	47,175.22	5,414.97	3.01	105,943.88
Low Medium I	13.5	2,160.66	160.45	2.36	5,111.90
Low Medium II	23.5	4,550.42	156.70	2.36	8,690.30
Medium	42 (20+ to 55)	25,269.32	464.08	2.35	45,804.99
High Medium	82 (55+ to 109)	4,398.14	40.39	2.36	7,815.69
TOTALS		72,946.00	10,674.91		200,930.95

GOAL 1

A SAFE, SECURE, AND HIGH QUALITY RESIDENTIAL ENVIRONMENT FOR ALL ECONOMIC, AGE, AND ETHNIC SEGMENTS OF THE CANOGA-PARK-WINNETKA-WOODLAND HILLS-WEST HILLS COMMUNITY PLAN AREA.

Objective 1-1

Achieve and maintain a housing supply sufficient to meet the diverse economic needs of current and projected population to the year 2010.

Policies

1-1.1 Maintain an adequate supply and distribution of multi-family housing opportunities in the Community Plan Area.

Program: The Plan Map identifies specific areas where multi-family residential development is permitted.

1-1.2 Protect existing single family residential neighborhoods from new, out-of scale development.

Program: Recent changes in the Zoning Code set height limits for new single family residential development.

1-1.3 Protect existing stable single family and low density residential

neighborhoods from being impacted by the size of commercial development.

Program: Commercial development in areas designated Neighborhood or General Commercial adjacent to single family residential shall be limited to an FAR of .5 to 1 and buffered by building setbacks and landscaping.

- 1-1.4 Protect the quality of the residential environment through attention to the physical appearance of communities.

Program: Design Guidelines and Standards for residential development are included in the Urban Design Chapter of the Community Plan.

- 1-1.5 Protect existing stable single family and low density residential neighborhoods from encroachment by higher density residential and other incompatible uses.

Program: The Plan Map identifies lands where only single family residential development is permitted; it protects these areas from encroachment by designating, where appropriate, transitional residential densities which serve as buffers (Transitional Height Ordinance); and reflects plan amendments and corresponding zone changes which are directed at minimizing incompatible uses.

- 1-1.6 Promote neighborhood preservation, particularly in existing single family neighborhoods, as well as in areas with existing multi-family residences.

Program: The Community Plan establishes residential land use categories and makes an appropriate designation for each neighborhood in the Community Plan Area. All zone changes, subdivisions, parcel maps, variances, conditional uses, specific plans, community and neighborhood revitalization programs for residential projects shall be consistent with Community Plan land use designations.

Program: The Homeowner's Encouragement Loan Program (HELP), administered by the City's Housing Preservation and Production Department, provides rehabilitation loans to owners of small residential buildings (one to four units) to correct code violation.

Program: The Residential Rehabilitation Loan Program, administered by the Community Redevelopment Agency (CRA), makes funds available for the rehabilitation of lower-income multi-family rental housing. The program is partially funded by the U.S. Department of Housing and Urban Development (HUD) and requires matching funds from a private lender with CRA as a last resort.

Program: The Targeted Neighborhood Initiative leverages resources of Department of Housing and the CRA to provide micro-loans and

grants to support housing rehabilitation and home ownership in specific residential neighborhoods.

Objective 1-2

Reduce automobile trips in residential areas by locating new housing in areas offering proximity to goods, services, and facilities.

Policies

1-2.1 Locate higher residential densities near commercial centers and major bus routes where public service facilities, utilities and topography will accommodate this development.

Program: Maintain and continue the implementation of the City's Land Use/Transportation Policy.

1-2.2 Encourage multiple residential development in commercial zones.

Program: The Plan provides the potential for a floor area ratio bonus by providing for mixed use corridors in specific commercial areas.

Objective 1-3

Preserve and enhance the character and integrity of existing single and multi-family neighborhoods.

Policies

1-3.1 Seek a high degree of compatibility and landscaping for new infill development to protect the character and scale of existing residential neighborhoods.

Program: The Plan includes Design Guidelines which establish design standards for residential development to implement this policy.

1-3.2 Approval of proposals to change residential density in any neighborhood shall be based, in part, on consideration of factors such as neighborhood character and identity, compatibility of land uses, impact on livability, adequacy of services and public facilities, and traffic impacts.

Program: The decision maker should adopt a finding which addresses these factors as part of any decision relating to changes in planned residential densities.

1-3.3 Preserve existing views in hillside areas.

Program: Maintain and continue implementation of the adopted Citywide Hillside Ordinance and the Mulholland Scenic Parkway Specific Plan which contribute to preservation of views.

Objective 1-4

Provide a diversity of housing opportunities capable of accommodating all persons regardless of income, age or ethnic background.

Policies

- 1-4.1 Promote greater individual choice in type, quality, price and location of housing.

Program: The plan promotes greater individual choice through its allocation of lands for a variety of residential densities.

- 1-4.2 Promote mixed use housing projects in pedestrian oriented areas.

Program: Maintain and continue the implementation of the Land Use/Transportation Policy.

Program: The plan provides a bonus in floor area for mixed use projects in the areas identified in this policy.

- 1-4.3 Ensure new housing opportunities minimize displacement of the residents.

Program: The decision-maker shall adopt a finding that addresses any potential displacement of residents as part of any decision relating to new housing construction.

- 1-4.4 Increase home ownership options by providing opportunities for development of townhouses, condominiums, and similar types of housing.

Program: The Plan cannot require that condominium units be built instead of rental units; however, the Plan encourages such type of development by designating specific areas for Low Medium residential land use categories.

Objective 1-5

To limit the intensity and density of residential development in hillside areas.

Policies

- 1-5.1 Limit development according to the adequacy of the existing and assured street circulation system within the Plan Area and surrounding areas.

Program: Continue the implementation of the Citywide Hillside Ordinance and the Mulholland Scenic Parkway Specific Plan.

- 1-5.2 Ensure the availability of adequate sewers, drainage facilities, fire protection services and facilities and other public utilities to support development within hillside areas.

Program: The decision-maker shall adopt a finding which addresses the availability of these services and utilities as part of any decision relating to hillside residential development.

- 1-5.3 Consider the steepness of the topography and suitability of the geology in any proposal for development within the Plan area.

Program: The Plan retains hillside areas in restrictive plan designations and zones due to topography. Continue the implementation of the Subdivision Map Act on individual project applications.

1-5.4 Require that any proposed development be designed to enhance and be compatible with adjacent development.

Program: Continue the implementation of the Citywide Hillside Ordinance and the Mulholland Scenic Parkway Specific Plan.

COMMERCIAL

The Canoga Park-Winnetka-Woodland Hills - West Hills Community Plan Area is the commercial hub of the West Valley. Commercial development in this Community Plan Area ranges from Corporate Headquarters in Warner Center, major shopping Malls such as Topanga Plaza, The Promenade, and Fallbrook Mall, pedestrian oriented community centers found along Ventura Boulevard and in Canoga Park, and a proliferation of auto-oriented strip development on major thoroughfares throughout the Community Plan Area.

The appearance, physical layout, and proliferation of strip mall development are major issues in the Community Plan Area. The allocation of land in the CPA designated for commercial use is sufficient to meet the needs of the community. However, poor or obsolete design and inadequate maintenance characterize a significant share of existing commercial development. Such substandard commercial development compromises the vitality of neighborhood and community commercial centers and has a blighting effect on adjacent residential neighborhoods. To address these issues, this plan provides for the use of design guidelines, Community design overlay districts, and policies that encourage recycling of obsolete commercial space over designation of new commercial lands.

The Land Use Diagram Map shows the general boundaries of Centers, Districts, and Mixed Use Boulevards in the Community Plan a (see Appendix A).

GOAL 2

AN ECONOMICALLY VITAL COMMERCIAL SECTOR OFFERING A DIVERSITY OF GOODS AND SERVICES TO MEET THE NEEDS OF THE COMMUNITY PLAN AREA. THIS MEANS THAT COMMERCIAL LAND USE POLICIES MUST SUPPORT MAXIMUM EFFICIENCY AND ACCESSIBILITY OF COMMERCIAL DEVELOPMENT WHILE PRESERVING THE HISTORIC COMMERCIAL AND CULTURAL CHARACTER OF THE DISTRICT.

Objective 2-1

Conserve and strengthen viable commercial development and encourage recycling of obsolete commercial development.

Policies

2-1.1 Locate new commercial development in areas currently designated for such development.

Program: The plan provides well defined boundaries for commercial areas, any extended growth outside those boundaries requires a plan amendment.

Program: Some commercial areas fall within the boundaries of CRA Redevelopment Project Area. Within these areas, obsolete commercial space may be recycled through use of redevelopment powers.

Objective 2-2

Enhance the appearance of commercial districts

Policies

2-2.1 Require that any proposed development be designed to enhance and be compatible with adjacent development.

Program: Continue the implementation of the Ventura/ Cahuenga Boulevard Corridor Specific Plan, and implement the applicable design standards identified in the Design Guidelines Chapter of the Community Plan.

2-2.2 Require screening of open storage and auto repair uses, and prohibit storage of automobile parts and other noxious commercial related products in front of commercial development, exposed to the street.

Program: The Community Plan and Specific Plans include Design guidelines which implement this policy.

2-2.3 Preserve community character, scale and architectural diversity.

Program: The Plan establishes height limits, amends Plan designations and recommends corresponding zone changes to implement this policy.

Program: Chapter V of this Plan, Urban Design includes design guidelines for individual commercial projects.

2-2.4 Improve safety and aesthetics of parking areas in commercial areas.

Program: Implement design standard for parking areas established in the Ventura/Cahuenga Boulevard Corridor Specific Plan and within the Design Standards Chapter of this plan.

2-2.5 Landscaped corridors should be created and enhanced through the planting of street trees along segments with no building setbacks and through median plantings.

Program: The Design Guidelines in this Plan and the Ventura/Cahuenga Boulevard Corridor Specific Plan include sections which establishes guidelines for community design and landscaping. These guidelines are intended to serve as reference to other City Departments and public agencies and any private entities who participate in projects which involve improvements to public spaces and right-of-way, including streetscape and landscaping.

Objective 2-3

Use Pedestrian Oriented Districts and Mixed Use Boulevards to provide alternatives to automobile oriented commercial activity.

Policies

2-3.1 Preserve existing Pedestrian Oriented Districts.

Program: Continue implementation of the Ventura/Cahuenga Boulevard Specific Plan which designates specific areas as POD districts.

2-3.2 New development in Pedestrian Oriented Districts should add to and enhance existing pedestrian street activity.

Program: New commercial activity within these districts should be consistent with uses specified within Specific Plan regulations or, for areas outside Specific Plan boundaries, POD implementing ordinances.

2-3.3 Require that the first floor street frontage of structures, including mixed use projects and parking structures located in pedestrian oriented districts, incorporate commercial uses.

Program: Continue implementation of the Ventura/Cahuenga Boulevard Corridor Specific Plan Design Guidelines which address this policy for areas within the Specific Plan boundaries. Additionally, where appropriate establish Pedestrian Oriented Districts outside of the Specific Plan boundaries.

Objective 2-4

Reinforce the identity of distinct commercial districts through the use of design guidelines and development standards.

Policies

2-4.1 Ensure that commercial infill projects achieve harmony with the best of existing development.

Program: Implementation of Design Guidelines and the Ventura/CAhuenga Boulevard Corridor Specific Plan.

2-4.2 Require that mixed use projects and development in pedestrian oriented districts be designed and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses.

Program: The Plan includes a Design Guidelines provision which will implement this policy for commercial projects located within pedestrian oriented districts.

2-4.3 Implement development standards that promote commercial development at a scale commensurate with their classification as Neighborhood, General, Community, or Regional Centers and that is compatible with adjacent, primarily residential uses.

Program: All commercial zones on properties designated

Neighborhood Commercial and General Commercial shall include the permanent [Q] conditions limiting Floor Area Ratio to 0.5:1. Mixed use projects located on Mixed Use Boulevards as designated by the Citywide General Plan Framework Land Use Diagram, may develop to an FAR of 1.5:1.

Program: All commercial zones for properties located on Owensmouth Avenue between Sherman Way and Vanowen Street shall include a permanent [Q] condition limiting development to a Floor Area Ratio of 1:1.

INDUSTRIAL

Industrial uses in the Community Plan Area are found adjacent to the former Southern Pacific Rail Right-Of-Way which runs parallel to Canoga Boulevard, and in Warner Center. Industrial restructuring in recent years has led to a deterioration of older industrial space along Canoga Boulevard, and pressures to reuse modern facilities for retail and other non-industrial uses.

GOAL 3

MAINTAIN A VITAL INDUSTRIAL BASE IN THE COMMUNITY PLAN AREA BY PROVIDING FOR AN ADEQUATE SUPPLY OF INDUSTRIAL LAND AND THROUGH POLICIES THAT REDUCE CONFLICTS BETWEEN INDUSTRIAL AND RESIDENTIAL LAND USES.

Objective 3-1

Provide sufficient land for expansion of low intensity industrial uses.

Policies

3-1.1 Designate lands for the continuation of existing entertainment industry uses and development of new production, post production, research and development uses which provide employment opportunities.

Program: The Plan Map identifies lands, which have industrial designations to accommodate the variety of uses noted above.

3-1.2 Require that any proposed development be designed to enhance and be compatible with adjacent development.

Program: Design Guidelines include provisions for industrial projects which are adjacent to or in the vicinity of residential uses.

Objective 3-2

Maintain viability of Canoga Boulevard Industrial Corridor and increase compatibility with adjacent residential properties through use of traditional commercial district revitalization strategies.

Policies

3-2.1 Improve the physical appearance of older industrial areas.

Program: Chapter V. - Urban Design includes design guidelines for individual industrial projects.

Program: The plan map designates boundaries for a Community Design Overlay District for a portion of the Canoga Boulevard

Industrial Corridor.

Objective 3-3

To assure mitigation of potential negative impacts generated by manufacturing uses when they are located in close proximity to residential neighborhoods, the Plan proposes design guidelines for new manufacturing uses when so located.

Policies

3-3.1 Encourage new industrial uses adjacent to residential neighborhoods to mitigate their impact on the residential neighborhoods to the extent feasible.

Program: New development of manufacturing uses located adjacent to residential neighborhoods shall comply with the Industrial/Residential design guidelines found in the Urban Design Chapter (Chapter V) of this plan.

Program: Restrict new industrial uses located adjacent to a residential neighborhood to uses first permitted in the CM zone.

PUBLIC AND INSTITUTIONAL LAND USE

Public facilities such as fire stations, libraries, parks, schools, and police stations shown on the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan are to be developed in substantial conformance with the standards of need, site area, design, and general location identified in the Service Systems Element and the Safety Element of the General Plan. Such development shall be sequenced and timed to provide an efficient and adequate balance between land use and public services.

Development to full residential, commercial, and industrial densities and intensities proposed by the Plan is predicated on substantial compliance with the standards contained in the Public Facilities and Service Element of the General Plan. Such development should be sequenced to provide a workable, efficient and adequate balance between land use and service facilities.

A continuing need exists to modernize public facilities, improve services, and accommodate changes in the Canoga Park - Winnetka - Woodland Hills - West Hills Community Plan. However, the amenities and environmental quality of the community must be adequately protected. Cost and equitable distribution are major issues in the provisions of public facilities. It is essential that priorities be established and new and different sources of revenue be found. Furthermore, public and private development must be coordinated to avoid expensive duplication and to assure a balance among needs, services and costs.

This plan seeks to use the location, characteristics, and timing of public facility and utility development as a tool in achieving planned land use patterns. The intent is to achieve economy and efficiency in the provision of services and facilities consistent with standards for environmental quality.

RECREATIONAL AND PARK FACILITIES

In the Canoga Park - Winnetka - Woodland Hills - West Hills Community Plan area public parks and the majority of recreational areas are managed by the City of Los Angeles Recreation and Parks Department. Parks fall into one of three categories: regional, community, or neighborhood.

Ten Neighborhood Parks, six Community Parks, and two Regional Parks serve the Canoga Park - Winnetka - Woodland Hills - West Hills Community Plan Area. Additionally, one private golf course is in the Community Plan Area. The plan area, with its diverse topography, limits the placement of park sites south of Ventura Boulevard. Thus those neighborhood parks located south of Ventura Boulevard offer limited recreational facilities for hillside homeowners. The community parks serve a much wider interest range due to the lack of sites in the hillside areas of the plan area. While the existing parks satisfy the needs of the current residents, the community is still deficient in the number of neighborhood parks.

GOAL 4

ADEQUATE RECREATION AND PARK FACILITIES WHICH MEET THE NEEDS OF THE RESIDENTS IN THE PLAN AREA.

Objective 4-1

To conserve, maintain and better use existing recreation and park facilities.

Policies

4-1.1 Preserve the existing recreational facilities and park space.

Program: By maintaining the Open Space zone and land use designation, existing parks and recreation facilities are protected.

OPEN SPACE

Open space provides the community with important physical benefits and environmental protection. There are two classifications for Open Space, publicly owned and privately owned open space. In addition to parkland, this Community Plan Area possesses important Open Space resources, public and private, owned by entities other than the City of Los Angeles.

Open Space is broadly defined as land which is essentially free of structures and buildings and/or is natural in character and functions in one or more of the following ways:

1. Recreational and educational opportunities.
2. Scenic, cultural and historic values.
3. Public health and safety.
4. Preservation and creation of community peak travel identity.
5. Rights-of-Way for utilities and transportation facilities.
6. Preservation of natural resources or ecologically important areas.

7. Preservation of physical resources including ridge protection.

GOAL 5

A COMMUNITY WITH SUFFICIENT OPEN SPACE IN BALANCE WITH NEW DEVELOPMENT TO SERVE THE RECREATIONAL, ENVIRONMENTAL AND HEALTH NEEDS OF THE COMMUNITY.

Objective 5-1

To preserve existing open space resources and develop new open space resources.

Policies

- 5-1.1 Encourage the retention of passive and visual open space which provides a balance to the urban development of the Plan Area.

Program: The Plan Map designates areas for open space, thus protecting them from encroachment from more intense uses.

- 5-1.2 Accommodate active park lands and other open space uses.

Program: The Plan Map designates lands for open space uses including and the slopes adjacent to the 101 freeway.

- 5-1.3 Require development in major opportunity sites to provide public open space.

Program: The Plan includes this as a guiding principle in the section which addresses the future development of major opportunity sites.

Objective 5-2

Provide/Insure access to the regional parks of the Santa Monica Mountains.

Policies

- 5-2.1 Insure that public access to the open space areas of the Santa Monica Mountains have adequate parking and trail heads.

Program: The City shall continue implementation of the Open Space and Conservation Element of the General Plan.

SCHOOLS

In the Canoga Park-Winnetka-Woodland Hills-West Hills, public schools are administered by the Los Angeles Unified School District (LAUSD). The number of LAUSD facilities in the Plan area are twenty-two elementary schools, five middle schools, and three high schools.

GOAL 6

PUBLIC SCHOOLS THAT PROVIDE A QUALITY EDUCATION FOR ALL OF THE CITY'S CHILDREN, INCLUDING THOSE WITH SPECIAL NEEDS, AND ADEQUATE SCHOOL FACILITIES TO SERVE EVERY NEIGHBORHOOD IN THE CITY.

Objective 6-1

Work constructively with LAUSD to promote the siting and construction of adequate school facilities phased with growth.

Policies

6.1.1 Explore creative alternatives for providing new school sites in the City, where appropriate.

Program: Develop plans to address issues of siting and joint use of facilities including strategies for expansion in transit-rich locations.

Program: Use the City's "Annual Growth Report" to monitor locations for growth and potential new school sites.

Objective 6-2

Maximize the use of local schools for community use and local open space and parks for school use.

Policies

6-2.1 Encourage the siting of community facilities (libraries, parks, schools and auditoriums) together.

Program: Formulate/update plans to address issues relating to siting and the joint use of facilities. Identify strategies for the expansion of school facilities including:

1. Siting of schools and other community facilities (libraries, parks, and auditoriums) within a transit station, center, or mixed-use area so they can complement each other and make the most efficient use of the land provided for these services.
2. Locating middle schools and high schools where possible, close to transit stations and key centers and mixed-use districts, so students can use the transit system to get to and from school.
3. Encouraging private redevelopment of existing school sites in the immediate vicinity of transit stations and centers so that the existing site (a low intensity use) would be replaced by a high intensity mixed-use development that would incorporate school facilities.

LIBRARIES

The Canoga Park - Winnetka - Woodland Hills - West Hills Plan area is serviced by three public library branches.

GOAL 7

ENSURE ADEQUATE LIBRARY FACILITIES AND SERVICES ARE PROVIDED TO THE AREA'S RESIDENTS.

Objective 7-1

To encourage the City's Library Department to provide adequate library service which responds to the needs of the community.

Policies

7-1.1 Encourage flexibility in siting libraries in mixed-use projects, shopping malls, pedestrian-oriented areas, transit stations, office buildings, and similarly accessible facilities.

Program: Through the inclusion of this policy in the Plan text, the Plan supports these identified locations as desirable sites for new libraries and recommends that this policy be considered when the Library Department and decision-makers review and approve site for new libraries.

POLICE PROTECTION

Police protection services are provided by the Los Angeles Police Department. The police station serving the Plan Area is the West Valley station located within the Reseda-West Van Nuys Community Plan Area.

GOAL 8

A COMMUNITY WITH ADEQUATE POLICE FACILITIES AND SERVICES TO PROTECT THE COMMUNITY'S RESIDENTS FROM CRIMINAL ACTIVITY, REDUCE THE INCIDENCE OF CRIME AND PROVIDE OTHER NECESSARY LAW ENFORCEMENT SERVICES.

Objective 8-1

To provide adequate police facilities and personnel to correspond with population and service demands.

Policies

8-1.1 Coordinate with the Police Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demands.

Program: A decision maker should include a finding which considers the impact on police service demands of the project or land use plan change. This consultation with the Police Department is currently in effect for plan amendments which must be reviewed by the General Plan Advisory Board which includes representation from the Police Department.

FIRE PROTECTION

The Fire protection and Prevention Plan of the City of Los Angeles provides an official guide to City Departments, other government agencies, developers and interested citizens for the construction, maintenance and operation of fire facilities. It is intended to promote fire prevention by maximizing fire safety education and minimizing loss of life through fire prevention programs. Pursuant to their plan it may be necessary to expand or relocate existing facilities as land patterns change.

GOAL 9

PROTECT THE COMMUNITY THROUGH A COMPREHENSIVE FIRE AND LIFE SAFETY PROGRAM.

Objective 9-1

Ensure that fire facilities and protective services are sufficient for the existing and future population and land uses.

Policies

9-1.1 Coordinate with the Fire Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demands.

Program: Require a decision maker to include a finding as to the impact on fire service demands for all plan amendments within five years of adoption.

This coordination with the Fire Department is currently in effect for projects which are subject to the subdivision process and for plan amendments which must be reviewed by the General Plan Advisory Board which includes representation from the Fire Department.

TRANSPORTATION

TRANSPORTATION IMPROVEMENT AND MITIGATION PROGRAM (TIMP)

Transportation Improvement and Mitigation Program [TIMP]

The Transportation Improvement and Mitigation Program (TIMP) is a set of specific transportation recommendations to meet the circulation needs of the community to the year 2010. The TIMP was prepared for the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan through an analysis of land use impacts on the transportation system.

Specific circulation improvements include a series of Public Transit Improvements which include bus service improvements, Metrolink service improvements and the creation of a community transit center. The TIMP contains Transportation System Management (TSM) recommendations including roadway improvements and redesignations, expansion of the Automated Traffic Surveillance and Control (ATSAC) system, peak hour parking restrictions, and creation of neighborhood traffic control plans. The TIMP also recommends a set of Transportation Demand Management (TDM) programs. TDM program recommendations include creating bikeways, forming transportation management associations, a trip reduction ordinance, and continued participation by the City in regional transportation management programs.

Below is a series of programs and implementation steps. Each implementation measure taken from the TIMP is identified in brackets [] as follows: [TIMP]

PUBLIC TRANSPORTATION

Opportunities exist within Canoga Park-Winnetka-Woodland Hills-West Hills to increase the use of public transportation.

While it is anticipated that the private automobile will remain the primary mode of transportation within the time frame of the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan, bus service and the community "DASH" or paratransit will be the primary public transportation modes through the year 2010.

The City of Los Angeles Department of Transportation (LADOT) operates "Cityride", a city-wide demand-responsive paratransit program for senior

citizens aged 65 or older and persons with mobility impairments. Cityride registrants may obtain a low-cost book of transit scrip each quarter which can be exchanged for MTA monthly bus passes and discounts on taxi, private lift-van and Cityride lift-van Dial-A-Ride services.

GOAL 10

DEVELOP A PUBLIC TRANSIT SYSTEM THAT IMPROVES MOBILITY WITH CONVENIENT ALTERNATIVES TO AUTOMOBILE TRAVEL.

Objective 10-1

To encourage improved local/shuttle bus service through the Community Plan Area and encourage park-and-ride facilities to interface with freeways, high occupancy vehicle (HOV) facilities, and rail facilities.

Policies

10-1.1 Coordinate with the Metropolitan Transportation Authority (MTA) to improve local bus service to and within the Community Plan Area.

Program: Transit improvements [TIMP]. Implement Transit Priority Treatment (e.g., signal coordination, transit signal priority, queue jumpers, bottleneck intersection improvements, and signing and striping modifications) along the following streets;

- C Canoga Avenue (Victory Boulevard to Oxnard Street)
- C Oxnard Street (Topanga Canyon Boulevard to Canoga Avenue)
- C Roscoe Boulevard (east of Topanga Canyon Boulevard)
- C Topanga Canyon Boulevard (Ventura Boulevard to Oxnard Street and north of Victory Boulevard)
- C Ventura Boulevard (east of Topanga Canyon Boulevard)
- C Victory/Vanowen corridor (east of Topanga Canyon Boulevard)

Program: Transit Improvements [TIMP]. Implement and/or support MTA's; implementation of recommendations contained in the *Study of Restructuring Public Transit Service in the San Fernando Valley*. Specifically:

- C Establish Warner Center Transit Center
- C Develop timed hub and spoke network focused on Warner Center Transit Center.
- C Establish new shuttle routes including a high frequency Canoga corridor shuttle, a West Valley shuttle, and a Calabasas shuttle.

Program: Transit Improvements [TIMP] Implement Warner Center Specific Plan Transit Improvements as planned. Particularly Canoga Boulevard north/south commuter shuttle, Long-Distance

Commuter Express Bus System, Warner Center internal DASH Shuttle System, and the Local Circulator Bus System.

Program: Transit Improvements [TIMP]. Implement Ventura Boulevard/Cahuenga Boulevard Corridor Specific Plan Transit Improvements.

- 10-1.2 Encourage the provision of safe, attractive and clearly identifiable transit stops with user friendly design amenities.

Program: The Plan includes an Urban Design chapter that outlines design guidelines for transit stops. Identification of transit stops and user friendly amenities are also being provided through implementation of the Ventura/Cahuenga Specific Plan. This Specific Plan establishes a Pedestrian Oriented District along Ventura Boulevard in Woodland Hills.

TRANSPORTATION DEMAND MANAGEMENT (TDM)

To the extent feasible and appropriate in light of the Mobility Plan's and the Community Plans' policies promoting multi-modal transportation and safety, it is the City's objective that the traffic level of service (LOS) on the street system in the community not exceed LOS E. Studies indicate that most of Canoga Park - Winnetka - Woodland Hills - West Hills major street intersections currently meet this standard. However, the level of trips generated by future development in the plan area and surrounding communities requires implementation of a Transportation Demand Management (TDM) Program and other improvements to enhance safety and mobility. TDM is a program designed to reduce trips. People are given incentives to use TDM measures such as public transit, ridesharing, modified work schedules, van pools, telecommuting, and non-motorized transportation modes such as the bicycle.

In addition to the specific policies and programs listed below, The Transportation Demand Management (TDM) Program for the Community Plan Area includes the following actions by the City.

1. Transportation Management Association Formation/Coordination.

The City should encourage the formation of Transportation Management Associations (TMA's) in order to assist employers in creating and managing trip reduction programs.

2. Participation in Regional Transportation Management Programs.

The city will continue to participate and coordinate with local and regional TDM programs that are in the process of being implemented, by other agencies, and adjacent jurisdictions.

3. TDM Ordinance. the Citywide Ordinance on TDM and trip reduction measures (L.A.M.C. 12.26 J) will continue to be implemented for the Canoga Park - Winnetka - Woodland Hills - West Hills area. This ordinance calls for several measures to be taken in developments to achieve trip reduction targets.

4. Monitoring. The City of Los Angeles Department of Transportation (LADOT) is responsible for monitoring the current Citywide TDM Ordinance.
5. The City should continue to implement bikeways development as specified in the Mobility Plan (2035) as part of an overall transportation demand management.

GOAL 11

ENCOURAGE ALTERNATIVE MODES OF TRANSPORTATION TO THE USE OF SINGLE OCCUPANT VEHICLES (SOV) IN ORDER TO REDUCE VEHICULAR TRIPS.

Objective 11-1

To pursue transportation demand management strategies, that can maximize vehicle occupancy, minimize average trip length, and reduce the number of vehicle trips.

Policies

- 11-1.1 Encourage non-residential development to provide employee incentives for utilizing alternatives to the automobile (i.e., carpools, vanpools, buses, flex time, bicycles, and walking, etc.).

Program: The Citywide Ordinance on TDM and trip reduction measures will continue to be implemented for the Canoga Park - Winnetka - Woodland Hills - West Hills area. This Ordinance calls for several measures to be taken by non-residential developments to achieve necessary trip reduction targets. [TIMP]

- 11-1.2 Require that proposals for major new non-residential development projects include submission of a TDM Plan to the City.

Program: The decision-maker shall include this requirement in approval of projects.

TRANSPORTATION SYSTEM MANAGEMENT (TSM)

Transportation System Management (TSM) strategies are intended to improve the existing transportation system through a program of minor, low cost, physical improvements. TSM incorporates features such as synchronization of traffic signals, limiting on-street parking during peak travel times, conversion of parallel arterials into one-way couplets, reversible lane operations, and intersection improvements.

GOAL 12

A WELL MAINTAINED, SAFE, EFFICIENT FREEWAY AND STREET NETWORK.

Objective 12-1

Reduction of vehicular trip delays in the Community Plan Area through coordination of the street traffic signal system with the Caltrans freeway traffic management system.

Policies

- 12-1.1 Implement Smart Corridor technologies in the Ventura Freeway corridor, including parallel arterials to the north and south [TIMP].
Program: Implement when funding is available.

Objective 12-2

That the Canoga Park - Winnetka - Woodland Hills - West Hills signalized intersections are integrated with the City's ATSAC system by the year 2010.

Policies

- 12-2.1 Install ATSAC equipment at an accelerated rate with expanded funding.
Program: Accelerated installation of ATSAC equipment when funding becomes available [TIMP]. ATSAC, a computerized system that directs traffic control operations based on the data collected at each signalized intersection, is recommended to be installed by the year 2010 at the arterial signalized intersections.
- 12-2.2 Accelerate controller replacement to upgrade and improve signal efficiency.
Program: Implement when funding is becomes available.

GOAL 13

TO THE EXTENT FEASIBLE AND CONSISTENT WITH THE MOBILITY PLAN 2035'S AND COMMUNITY PLANS' POLICIES PROMOTING MULTI-MODAL TRANSPORTATION AND SAFETY, A SYSTEM OF FREEWAYS AND STREETS THAT PROVIDES ADEQUATE CIRCULATION TO SUPPORT EXISTING, APPROVED, AND PLANNED LAND USES AND MAINTAINS A DESIRED LEVEL OF SERVICE AT INTERSECTIONS.

Objective 13-1

To the extent feasible and consistent with the Mobility Plan 2035's and the Community Plans' policies promoting multi-modal transportation and safety, comply with Citywide performance standards for acceptable levels of service (LOS) and insure that necessary road access and street improvements are provided to accommodate traffic generated by new development.

Policies

- 13-1.1 To the extent feasible and consistent with the Mobility Plan 2035's and the Community Plans' policies promoting multi-modal transportation (e.g., walking, bicycling, driving, and taking public transit) and safety, maintain a satisfactory LOS for streets that should not exceed LOS "D" for Boulevards, Avenues, and Collector Streets. If existing levels of service are LOS "E" or LOS "F" on a portion of an arterial or collector street, then the level of service for future growth should be maintained at LOS "E", where feasible and consistent with the Mobility Plan.

Program: To the extent feasible and consistent with the policies of the Mobility Plan 2035, implement the Warner Center Specific Plan Phase I channelization and striping improvements on Burbank Boulevard from Topanga Canyon Boulevard to Ventura Freeway and Oxnard Street form Topanga Canyon Boulevard to Canoga Avenue.

Program: Implement the following Warner Center Specific Plan Phase I peak hour parking restrictions or prohibitions, to the extent feasible and consistent with the policies and programs of the Mobility Plan 2035, to provide 6 through lanes of traffic, at least during peak traffic periods [TIMP]:

1. De Soto Avenue - Vanowen Street to Victory Boulevard;
2. Topanga Canyon Boulevard - Victory Boulevard to Burbank Boulevard;
3. Topanga Canyon Boulevard - Sherman Way to Strathern Street;
4. Victory Boulevard - Fallbrook Avenue to Topanga Canyon Boulevard;
5. Winnetka Avenue from south of Victory Boulevard to Roscoe Boulevard.
6. Sherman Way from Fallbrook Avenue to Victory Boulevard; restrict parking, at least during peak periods, to provide 6 through lanes. The need for the proposed peak parking restrictions on Sherman Way will be reevaluated at the time of the intended Plan review in the fifth year following Plan adoption, pending evaluation of the successfulness of the ongoing Canoga Park business district pedestrian and streetscape enhancements. The proposed restrictions will not be implemented prior to such review.

Program: In a manner feasible and consistent with the policies of the Mobility Plan, implement intersection improvements (including right-of-way acquisition, intersection flaring, and signal improvements) recommended in the Ventura/Cahuenga Boulevard Corridor Specific Plan, Phase I and II [TIMP].

Program: To the extent feasible and consistent with the policies of the Mobility Plan (2035), implement Warner Center Specific Plan Phase I intersection improvements as growth and traffic warrants [TIMP].

Program: Improve to their designated standard specifications, substandard segments of arterials expected to experience heavy traffic congestion by the year 2010, to the extent feasible and consistent with the Mobility Plan. The following streets should be included in the City's Capital Improvement Program.

1. Burbank Avenue from Fallbrook Avenue to Farralone Avenue: Improve to provide 4 through lanes.
2. Victory Boulevard from Topham Street to Corbin Street: improve and implement peak parking restrictions to provide 6 peak through lanes.

Program: Implement the following Warner Center Specific Plan Phase I street improvements [TIMP], in a manner feasible and consistent with the policies and programs of the Mobility Plan.:

1. Canoga Avenue from Vanowen Street to Victory Boulevard: upgrade and widen from Avenue to Boulevard standards.
2. Canoga Avenue at Ventura Freeway: widen to provide 6 through traffic lanes under US 101 Bridge.
3. De Soto Avenue at Los Angeles River: widen to provide 6 traffic lanes on the Los Angeles River bridge.
4. De Soto Avenue at Ventura Freeway: widen to provide 3rd northbound through traffic lane under US 101 Bridge.
5. Oxnard Street from Topanga Canyon Boulevard to De Soto Avenue: upgrade and widen from Avenue to Boulevard standards.
6. Ventura Freeway westbound on-ramp from Burbank Boulevard: widen to provide 2 traffic lanes through the ramp meter.

Program: Implement the following street widenings, to the extent feasible and consistent with the policies and programs of the Mobility Plan. [TIMP]

1. Fallbrook Avenue from Ventura Boulevard to Avenue San Luis: reconstruct and widen to provide left turn lane, 2 through northbound lanes, and 1 through southbound lane.
2. Mulholland Drive from west of San Feliciano Drive to east of Mulholland Highway: reconstruct and widen to provide 4 through lanes.
3. Mulholland Drive from east of Mulholland Highway to Topanga Canyon Boulevard: reconstruct and widen to provide 4 through lanes.
4. Roscoe Boulevard from Jason Avenue to Valley Circle Boulevard: Improve to provide 4 through lanes.

13-1.2 Discourage non-residential traffic flow for streets designed to serve residential areas only by the use of traffic control measures.

Program: The use of Residential Neighborhood Protection Plans to relieve congestion on collector streets that are expected to experience traffic congestion by the year 2010[TIMP].

Program: Implement Warner Center Specific Plan Neighborhood Protection Plans for designated neighborhoods [TIMP].

Objective 13-2

To insure that the location, intensity and timing of infrastructure development maintain the City's streets standards.

Policies

13-2.1 No increase in density and intensity shall be effectuated by zone change, variance, conditional use, parcel map, or subdivision unless it is determined that the transportation system can accommodate the increased traffic generated by the project.

Program: The decision-maker shall adopt a finding which addresses this factor as part of any decision.

Program: Require that new development projects incorporate TSM and/or TDM programs with Citywide Land Use Transportation Policy.

13-2.2 Driveway access points onto, arterial, and collector streets should be limited in number and be located to insure a smooth, and safe flow of vehicles and bicycles.

Program: Require that new development projects incorporate such considerations.

NON-MOTORIZED TRANSPORTION

The plan provides for various modes of non-motorized transportation/circulation such as walking and bicycle riding. The Mobility Plan (2035) identifies a backbone bikeway system and support routes through Canoga Park - Winnetka - Woodland Hills - West Hills. The Community Plan establishes policies and standards to facilitate the development of a bicycle route system which is intended to complement other transportation modes.

The Citywide Major Equestrian and Hiking Trails Plan identifies proposed equestrian trails in the community.

GOAL 14

A SYSTEM OF SAFE, EFFICIENT AND ATTRACTIVE BICYCLE, PEDESTRIAN AND EQUESTRIAN FACILITIES.

Objective 14-1

To promote an adequate system of safe bikeways for commuter, school and recreational use.

Policies

14-1.1 Assure that local bicycle facilities are identified and linked with facilities of neighboring areas of the City.

Program: The Community Plan endorses full implementation of the Mobility Plan, which designates bikeways for the following ;

1. Class I bike path along the Los Angeles River.

2. Class II bike lanes along Bell Canyon Boulevard, Mulholland Drive (east of Mulholland Highway), <Mobility Plan designates for Class IV bike lane>, Victory Boulevard (Valley Circle Boulevard to Fallbrook Avenue), Victory Boulevard (Valley Circle Boulevard to Fallbrook Avenue), Victory Boulevard (east of De Soto Avenue), and Winnetka Avenue (north of Ventura Boulevard).
3. Commuter (peak period) bike lanes on De Soto Avenue (north of Victory Boulevard), Roscoe Boulevard (east of Topanga Canyon Boulevard) and Victory Boulevard (Fallbrook Avenue to De Soto Avenue).

14-1.2 Encourage the provision of showers, changing rooms and bicycle storage at new and existing non-residential developments and public places.

Program: Los Angeles municipal Code Sections 12.21 A 16 and 91.0705 provide for bicycle parking requirements and employee facilities for showers and lockers.

PARKING

The Plan supports the City’s continuing efforts to develop City owned (off-street) parking facilities in Canoga Park - Winnetka - Woodland Hills - West Hills. City- owned parking lots should be located in or near commercial areas.

GOAL 15

A SUFFICIENT SYSTEM OF WELL DESIGNED AND CONVENIENT ON-STREET PARKING AND OFF-STREET PARKING FACILITIES THROUGHOUT THE PLAN AREA.

Objective 15-1

To provide parking in appropriate locations in accord with Citywide standards and community needs.

Policies

15-1.1 Consolidate parking where appropriate, to minimize the number of ingress and egress points onto Arterials.

Program: The Plan contains an Urban Design Chapter which outlines guidelines for parking areas.

15-1.2 Consider new Citywide parking standards for areas around transit stations, designated centers and pedestrian oriented areas.

Program: Implement peripheral parking lot/ structure program as recommended in the Ventura/Cahuenga Boulevard Corridor Specific Plan.

15-1.3 New parking lots and new parking garages shall be developed in accordance with design standards.

Program: The Plan contains an Urban Design Chapter which outlines guidelines for parking facilities.

HISTORIC AND CULTURAL RESOURCES

Much of the history of the Canoga Park-Winnetka-Woodland Hills-West Hills reflects economic transformation of the area from Native American Settlements, then the development of farming communities, and later rapid suburbanization and development of a strong aerospace sector. The Historical and cultural resources of the Community Plan Area reflect this rapid change. Important landmarks reflecting the Community's history include the Workman House at Shadow Ranch Park, the Ledere Residence, and Leonis Adobe.

Today the Community Plan Area is culturally diverse and contains important cultural resources. These resources include El Centro De Amistad, Valley Cultural Center, Warner Plaza, the New Madrid Performing Arts Center, numerous art galleries, and performing groups.

GOAL 16

PRESERVATION AND RESTORATION OF CULTURAL RESOURCES, NEIGHBORHOODS, AND LANDMARKS WHICH HAVE HISTORICAL AND/OR CULTURAL SIGNIFICANCE.

Objective 16-1

To ensure that the community's historically significant resources are protected, preserved, and/or enhanced.

Policies

16-1.1 Assist private owners of existing and future historic resources to maintain and/or enhance their properties in a manner that will preserve the integrity of such resources in the best possible condition.

Program: Adherence to the City's historic properties preservation ordinances and Cultural Heritage Board requirements for preservation and design. Implementation of design standards.

Program: Utilize City historic properties restoration programs which provide funding for renovating and/or reusing historic structures.

SUMMARY OF LAND USE

CATEGORY	LAND USE	CORRESPONDING ZONES	NET ACRES	% AREA	TOTAL NET ACRES	TOTAL % AREA
RESIDENTIAL						
Single Family					9,860	55.1
	Minimum	OS, A1, A2, RE40	1,012	5.7		
	Very Low	RE20, RA, RE15, RE11	3,424	19.1		
	Low	RE9, RS, R1, RU, RD6, RD5	5,424	30.3		
Multiple					826	4.6
	Low Medium I	R2, RD3, RD4, RZ3, RZ4, RU, RW1	162	0.9		
	Low Medium II	RD1.5, RD2, RW2, RZ2.5	156	0.9		
	Medium	R3	469	2.6		
	High Medium	R4	39	0.2		
COMMERCIAL					972	5.4
	Neighborhood	C1, C1.5, C2, C4	167	0.9		
	Limited	CR, C1, C1.5, P	52	0.3		
	General	CR, C1.5, C2, C4	186	1.0		
	Community	CR, C2, C4	347	2.0		
	Regional	CR, C1.5, C2, C4, R3, R4, R5	220	1.2		
INDUSTRIAL					677	3.8
	Limited	CM, MR1, M1	292	1.6		
	Light	MR2, M2	385	2.2		
PARKING					0	0.0
	Parking	P, PB	0	0.0		
OPEN SPACE/PUBLIC FACILITIES					2,117	11.8
	Open Space	OS, A1	1,404	7.8		
	Public Facilities	PF	713	4.0		
STREETS						
	Private Streets	-	21	0.1	3,442	19.3
	Public Streets	-	3,421	19.2		
TOTAL					17,894	100.0

Chapter IV

COORDINATION OPPORTUNITIES FOR PUBLIC AGENCIES

Chapter 4 identifies actions which are recommended to be promoted by the City through the appropriate city departments and through other agencies including Federal, State, and private sector entities to further the goals of the Plan. These are objectives or goals that the Planning Department does not have control over, but which involve issues that should be identified in the community plan and which help to reinforce the intent of the goals and objectives found in Chapter 3.

RECREATION AND PARK FACILITIES AND OPEN SPACE

1. The City Department of Recreation and Parks should work with the Los Angeles Unified School District to develop a program for shared use of school sites for both educational and recreation and park opportunities.
2. Encourage continuing efforts by County, State, and Federal agencies to acquire vacant land for publicly-owned open space.
3. Ensure that parks are adequately illuminated and secured for safe use at night, as appropriate.
4. Coordinate with the Department of Recreation and Parks and the Police Department to insure adequate police patrols and "defensible space", where feasible, in the design of recreation and park facilities.
5. Promote the supervision of park activities and enforcement of codes restricting illegal activity.
6. Improve the utilization and development of recreational facilities at existing parks, as needed, and as funds become available.
7. Coordinate with City Departments, neighboring cities, and County, State, and Federal agencies to utilize existing public lands such as flood control channels, utility easements, and Department of Water and Power properties for such recreational uses as hiking, biking and horseback riding, where possible.
8. Plan and design the expansion of existing facilities and the acquisition of new sites to minimize the displacement of housing and the relocation of the residents.
9. Target the provisions of park and recreation facilities in areas with the greatest deficiencies.
10. Pursue resources to clean up land that could be used for public recreation safely.

SCHOOLS	Consider large vacant parcels as a first alternative to accommodate the demand for new schools, prior to the displacement of existing uses.
LIBRARIES	<ol style="list-style-type: none"> 1. Seek additional resources to maintain and expand library services to satisfy service demands to the Year 2010. 2. Develop a Citywide policy for locating non-English language permanent collections. 3. Support the efforts of the Library Department and the Canoga Park - Winnetka - Woodland Hills - West Hills community to increase the service levels of the libraries so they are appropriate for the Canoga Park - Winnetka - Woodland Hills - West Hills population.
POLICE PROTECTION	Support and encourage community-based crime prevention efforts such as Neighborhood Watch, through regular intersection and coordination with existing community-based policing, foot and bicycle patrols, watch programs, assistance in the formation of new neighborhoods watch groups, and regular communication with neighborhoods and civic organizations.
FIRE PROTECTION	Provide that adequate fire service personnel are maintained by periodically evaluating population growth, level-of-service (response TAMP and staffing) and fire hazards in the City.
HISTORIC PRESERVATION	Assist private owners of historic resources to maintain and/or enhance their properties in a manner that will conserve the integrity of such resources in the best possible condition.
HOUSING	<ol style="list-style-type: none"> 1. Locate senior citizen housing projects in neighborhoods within reasonable walking distance of health and community facilities, services and public transportation. 2. Maintain and preserve the character and integrity of existing neighborhoods and encourage participation in self-help preventive maintenance to promote neighborhood conservation, beautification and rehabilitation. 3. Improve the coordination of public services to support neighborhood conservation activities. 4. Ensure that the location of low and moderate income housing is equitably distributed throughout the Plan area predicated on a fair share basis in relationship to all other planning areas. 5. Encourage new and alternative housing concepts, as well as alternative materials and methods of construction, which are found to be compatible with City codes.

6. Allow for the assembly and trade of public land in order to encourage new housing in appropriate locations within the Plan area.
7. Ensure that the development of transitional housing and emergency shelters is appropriately located.
8. Encourage the development of housing types intended to meet the special needs of senior citizens and the physically challenged.

UTILITIES

Install utilities underground through assessment districts or other funding, when feasible.

EMPLOYMENT

1. Encourage businesses to participate in job training programs for local residents.
2. Develop employment opportunities for a wide range of jobs, skills, and wages.

PUBLIC TRANSPORTATION

1. Coordinate with the Metropolitan Transit Authority to improve local bus service to and within the Canoga Park - Winnetka - Woodland Hills - West Hills Community Plan Area.
2. Encourage the expansion of programs wherever feasible, aimed at enhancing the mobility of senior citizens, disabled persons, and the transit-dependent population.
3. Develop an intermodal mass transportation plan to link future rail service.

NON-MOTORIZED TRANSPORTATION

Encourage funding and construction of bicycle facilities connecting residential neighborhoods to schools, open space areas, employment centers and transit stations.

NATURAL DISASTERS

Natural disasters such as the 1971 Sylmar-San Fernando and the 1994 Northridge earthquakes, floods, and fires have and will continue to impact the Canoga Park - Winnetka - Woodland Hills - West Hills community. City government, other governmental agencies, the private sector, disaster relief agencies, and the citizens of Canoga Park - Winnetka - Woodland Hills - West Hills should be encouraged to work together to minimize the impacts of a disaster in terms of land development practices, providing essential services, preventing transportations and communication blockages and to ensure that recovery will proceed as expeditiously as possible.

EARTHQUAKE PREPAREDNESS

The 1994 Northridge earthquake devastated portions of the Canoga Park - Winnetka - Woodland Hills - West Hills area. The magnitude 6.8 (Richter Scale) earthquake caused extensive and widespread property damage to residences, businesses, nonprofit organizations, public facilities, and infrastructure including freeways, water lines, power lines, and natural gas

lines. Recovery and rebuilding efforts have already begun following the North ridge earthquake and will continue over the next several years.

Chapter V URBAN DESIGN

The Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan Area is made up of a number of neighborhoods with distinctive characteristics. It is the purpose of this Chapter to lay out broad, general policies for individual multiple residential and commercial projects, and community design elements. This Chapter is divided into two sections. The Design Policies section is directed at individual projects. The Community Design and Landscaping Guidelines section is directed at a community's use of streetscape improvements and landscaping in public spaces and rights-of-way.

The Design Policies in this Chapter establish the minimum level of design that shall be observed in multiple residential and commercial projects within the entire Plan Area. They also address design issues for parking and landscaping.

The Administration of the general policies found in this Chapter shall be by establishment of a Community Design Overlay District (CDO), for specific portions of the Canoga Park-Winnetka-Woodland Hills-West Hills Community, per the Supplemental Use District Section of the Zoning Code (Section 13.00)

GOALS AND PURPOSES

These design policies and standards are to ensure that residential, commercial and industrial projects and public spaces and rights-of-way incorporate specific elements of good design. The intent is to promote a stable and pleasant environment.

The Design Policies for commercial corridors emphasize the visual continuity of streetscapes and creation of an environment that encourages pedestrian and economic activity. The Design Policies for multiple-family residential areas emphasize architectural design to enhance quality-of-life, living conditions and neighborhood pride of the residents.

DESIGN POLICIES FOR INDIVIDUAL PROJECTS

COMMERCIAL

Site Planning

Structures shall be oriented toward the main commercial street where a parcel is located and shall avoid pedestrian/ vehicular conflicts by:

1. Locating surface parking to the rear of structures.

2. Minimizing the number of driveways providing sole access to the rear of commercial lots.
3. Maximizing retail and commercial service uses along frontages of commercial developments.
4. Providing front pedestrian entrances for businesses fronting on main commercial streets.
5. Providing landscaping strips between driveways and walkways accessing the rear of properties.
6. Providing speed bumps for driveways paralleling walkways for more than 50 feet.
7. Requiring site plans which include ancillary structures, service areas, pedestrian walkways, vehicular path, loading areas, drop off and landscaped areas.
8. Providing where feasible, the under grounding of new utility service.

Height and Building Design

The mass, proportion and scale of all new buildings and remodels shall be at a pedestrian scale. The design of all proposed projects shall be articulated to provide variation and visual interest, and enhance the streetscape by providing continuity and avoiding opportunities for graffiti.

Building materials shall be employed to provide relief to bland untreated portions of exterior building facades. The purpose of these provisions is to ensure that a project avoids large sterile expanses of building walls, is designed in harmony with the surrounding neighborhood and creates a stable environment with a pleasant and desirable character.

1. No structure shall exceed two stories in height within 15 feet and 30 feet of front and rear property lines, respectively.
2. Maximize the area devoted to transparent building elements, for front facades and facades facing rear parking.
3. Require use of articulation, recesses, surface perforations, porticoes to break up long, flat building facades.
4. Use accenting, complementary building materials for building facades.
5. Maximize application of architectural features or articulation of building facades.
6. Designate architecturally untreated facades for signage.
7. Screen of mechanical and electrical equipment from public view.
8. Screen all rooftop equipment and building appurtenances from public

view.

9. Require the enclosure of trash areas for all projects.

Parking Structures

Parking structures shall be integrated with the design of the buildings they serve through:

1. Design of parking structure exteriors to match the style, materials and color of the main building.
2. Use landscaping to screen parking structures not architecturally integrated with the main building.
3. Buffer adjacent residential uses from parking structures with landscaping and decorative walls.

Surface Parking Landscaping

1. Devote 2% of total surface area of surface parking lots to landscaping.
2. Provide landscaped buffers along public streets or adjoining residential uses.

Light and Glare

1. Install on-site lighting along all pedestrian walkways and vehicular access ways.
2. Shield and direct on-site lighting onto driveways and walkways. Direct on-site lighting away from adjacent residential uses.

Multiple Residential Site Planning

All multiple residential projects of five or more units shall be designed around a landscaped focal point or courtyard to serve as an amenity for residents.

1. Provide a pedestrian entrance at the front of each project.
2. Require useable open space for outdoor activities, especially for children.

Design

The design of all buildings shall be of a quality and character that improves community appearance by avoiding excessive variety and monotonous repetition. This policy shall be accomplished through:

1. Requiring the use of articulations recesses surface perforations and porticoes to break up long, flat building facades.
2. Using complementary building facades.

3. Incorporating varying designs to provide definitions for each floor.
4. Integrating building fixtures, awnings, security gates, etc. into design of the building
5. Screening all rooftop equipment and building appurtenances from adjacent properties.
6. Require decorative, masonry walls to enclose trash.

Parking Structures

Parking structures shall be integrated with the design of the building they serve through:

1. Designing parking structure exterior to match the style, materials and color of the main building.
2. Using decorative walls and landscaping to buffer residential uses from parking structures.

INDUSTRIAL/ RESIDENTIAL INTERFACE AREAS

Design Guidelines

In order to mitigate potential negative impacts generated by manufacturing uses when they are located adjacent to residentially zoned or developed neighborhoods, new development of manufacturing uses shall incorporate the following design guidelines:

Loading Areas

New development of industrial uses located across a local or collector street from a residentially zoned or developed lot shall design their loading area in such a manner that the loading area is visually shielded from the line of sight of adjacent residential uses by a 3 ½ to 8 foot solid decorative masonry wall, depending on whether the wall is located in a front, side, or rear yard.

Walls/Landscaping

1. Where vehicle parking, loading, or open storage for new industrial development is located within 50 feet of a public street which separates the industrial and residential zones or uses, a minimum 3 ½ foot high solid decorative masonry wall shall be provided in a front yard, or a minimum 5 foot 9 inch to 8 foot solid decorative masonry wall in a side or rear yard. That a minimum of a 5 foot landscaped setback buffer with an installed automatic sprinkler system shall be located in front of said wall, along the street frontage.
2. New industrial development located directly across a local or collector street from a residentially zoned or developed neighborhood shall provide a minimum 5 foot landscaped setback along any portion of the frontage, not required for driveways, facing the residential use. Said landscaping shall contain a minimum of one 24 inch box tree (with a minimum trunk diameter of two inches, a height of eight feet at the time of planting, and

with an installed automatic sprinkler system) for every 30 feet of street frontage.

3. On any other interior property line which separates an industrial use from an abutting residential zone or use, a minimum 5 foot 9 inch to 8 foot solid decorative masonry wall shall be provided.

Architectural Guidelines

1. New industrial development located directly across a local or collector street, or with a lot line adjoining a residentially zoned or developed area, shall have all exterior lighting shielded and directed onto the site and no floodlighting shall be located so as to be seen directly by adjacent residential areas. This condition shall not preclude the installation of low-level security lighting.
2. New industrial development on local or collector streets fronting onto residentially zoned or developed areas shall be designed with articulated facades (for example, facades that have architectural details, wall breaks, or other architectural features which provide at least 5 feet of relief to a minimum depth of 8 inches every 20 feet of the length of the building wall) facing the residential development.
3. New industrial development adjacent to residentially zoned or developed areas shall be designed with no window openings facing residential properties if the structure is within 10 feet of the side or rear property lines.
4. On new industrial development adjacent to residentially zoned or developed areas, all exhaust fans and exterior or rooftop mechanical equipment shall be screened with such screening material incorporated in the design of the project. Such equipment shall be set back as far as possible from residential property lines and sound proofed.

COMMUNITY DESIGN AND LANDSCAPING GUIDELINES

In addition to identifying Design Policies for individual projects, a community's identity can be enhanced through improvements to the streetscape and landscaping in public spaces and rights-of-way. It is the intent of this section to establish a set of guidelines that will serve to improve the environment both aesthetically and physically. These guidelines should be implemented as public improvements occur in the CPA that affect public spaces and rights-of-way. These guidelines should be referred to and implemented to the extent feasible through such projects and should be a guide to other City departments as they develop, update and implement their respective plans.

The presence or absence of street trees is an important ingredient in the aesthetic quality of an area. Consistent use of appropriate street trees provides shade during hot summer months, emphasizes sidewalk activity by separating vehicle and pedestrian traffic, and creates an area wide identity which distinguishes the communities within Canoga Park - Winnetka - Woodland Hills - West Hills from each other.

The following improvements are recommended:

**ENTRYWAY
IMPROVEMENTS**

Provide improvements along principal streets and at major identified intersections and edges which clearly distinguish these locations as major streetscapes and entries. Such improvements may include elements such as signage, landscaping, vertical pylons and/or other distinctive treatments.

STREETSCAPE

1. Provide for a coordinated streetscape design at identified entries to the Plan Area, the Community Center and the Regional Center that includes street lighting, street furniture, and sidewalk/crosswalk improvements in the public right-of-way.
2. Establish a comprehensive streetscape and landscape improvement program for identified corridors and districts for the selection and installation of, but not limited to, the following:
 - a. street trees
 - b. street lighting
 - c. streetscape elements (sidewalk/crosswalk paving, street furniture)
 - d. public signage

STREET TREES

1. Select species which:
 - a. Enhance the pedestrian character, and convey a distinctive high quality visual image.
 - b. Are drought and smog tolerant, and fire-resistant, and complement existing street trees.
2. Establish a hierarchy for street trees which shall include:
 - a. Major Accent Trees.

These trees should be located at entry locations, intersections, and activity centers.
 - b. Street Trees.

Select specific species to be the common tree for street frontages. A single flowering species may be selected for all residential neighborhoods and commercial districts or different species selected to distinguish one neighborhood, district, or street from another. In residential neighborhoods, the trees should be full, to provide shade and color. In commercial districts, the trees should provide shade, but be more transparent to promote views of store fronts and signs.
 - c. Ornamental or Special Plantings.

At special areas along street frontages, such as linkages to pedestrian walkways and plazas and outdoor dining areas, ornamental trees providing shade and color should be utilized to emphasize and focus attention on those places.

Provide for the installation of street trees along public sidewalks defining the types and spacing in accordance with a Street Tree Master Plan.

STREET FURNITURE

Install street furniture that encourages pedestrian activity or physical and visual access to buildings and which is aesthetically pleasing, functional and comfortable. Street furniture may include such elements as bus and pedestrian benches, bus shelters, kiosks, trash receptacles, newspaper racks, bicycle racks, public telephones, landscaped planters, drinking fountains, and bollards. Priority should be given to pedestrian-oriented areas.

STREET LIGHTING

Establish street lighting standards for commercial districts which provide elements of design and compatibility with street furniture and building facades.

1. Install new street lights in commercial districts which are attractively designed, and compatible with facades and other street furniture, to provide adequate visibility, security, and a festive night time environment.
2. Establish a consistent street lighting type utilizing a light standard that is compatible with the overall street furniture and graphic/signage program,
3. Any new street lighting or pedestrian lighting system built in the public right-of-way must be designed to currently adopted City standards. Equipment must be tested and approved by the Bureau of Street Lighting.
4. New lighting systems will be designed to minimize glare and “light trespass”.
5. No new or replacement lighting systems require due process. Street lighting is installed through the formation of special assessment districts. Where any increase in special assessment is anticipated, public hearings are required.
6. Ornamental or historic poles can not be removed without the prior approval of the City’s Cultural Affairs Commission.

SIDEWALKS/PAVING

Develop sidewalk “pull-outs” at intersections, where they do not adversely impact traffic flow or safety or disrupt bus service, by extending the sidewalk to the depth of a parking stall to accommodate landscaping and street furniture and reduce the crosswalk width.

SIGNAGE

Establish a consistent design for all public signage, including fixture type, lettering, colors, symbols, and logos designed for specific areas or pathways.

1. Provide for distinctive signage which identifies principal entries to unique neighborhoods, historic structures, and public buildings and parks.
2. Ensure that public signage complements and does not detract from adjacent commercial and residential uses.
3. Provide for signage which uniquely identifies principal commercial areas.

PUBLIC OPEN SPACE AND PLAZAS

Establish public open space standards that will guide the design of new public plazas and open spaces. These standards should include the following:

1. Consideration of the siting of open space to maximize pedestrian accessibility and circulation.
2. Solar exposure or protection.
3. Adjacent to pedestrian routes and other open spaces.
4. Appropriate plant and hardscape materials.

RICHARD RIORDAN, Mayor
James Kenneth Hahn, City Attorney
Rick Tuttle, Controller

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DEPARTMENT OF CITY PLANNING

Con Howe, Director of Planning
Franklin Eberhard, Deputy Director
Gordon B. Hamilton, Deputy Director
Robert H. Sutton, Deputy Director

COMMUNITY PLAN UPDATE

COMMUNITY PLANNING

Jack Sedwick, Principal City Planner
Frank Fielding, Senior City Planner
Deuk Perrin, City Planner
Jim Holmes, City Planning Associate

GEOGRAPHIC INFORMATION SYSTEMS

Paul Burns, GIS Supervisor I
Carmen Miraflor, GIS Supervisor I
Daniel Garcia, GIS Specialist
Cecelia Hernandez, GIS Specialist

PUBLICATION

Gary Booher, City Planner
Jae H. Kim, City Planning Associate
Hilda Garcia, Principal Clerk
Edna Roxas-Zafra, Clerk Typist

DEPARTMENT OF
CITY PLANNING
200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801
CITY PLANNING COMMISSION

MABEL CHANG
PRESIDENT
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MARY GEORGE
MICHAEL MAHDESIAN
BRADLEY MINDLIN
THOMAS E. SCHIFF

GABRIELE WILLIAMS
COMMISSION EXECUTIVE ASSISTANT
(213) 978-1300

CITY OF LOS ANGELES
CALIFORNIA



JAMES K. HAHN
MAYOR

EXECUTIVE OFFICES

CON HOWE
DIRECTOR
(213) 978-1271
FRANKLIN P. EBERHARD
DEPUTY DIRECTOR
(213) 978-1273
GORDON B. HAMILTON
DEPUTY DIRECTOR
(213) 978-1272
ROBERT H. SUTTON
DEPUTY DIRECTOR
(213) 978-1274
FAX: (213) 978-1275
INFORMATION
(213) 978-1270
www.lacity.org/PLN

April 21, 2005

All Interested Parties:

**RAS INTERPRETATION TO COMMUNITY PLAN FOOTNOTES
DIRECTOR'S INTERPRETATION**

Attached is a copy of the Department of City Planning's interpretation of Ordinance 174,999, effective January 15, 2003, which established the RAS Zones. This published interpretation becomes final and effective 20-days from the date of this communication unless an appeal to the City Planning Commission is filed within this time period. Appeals shall be filed in duplicate on forms provided at any of the following public offices of the Department of City Planning, along with the required filing fee:

Planning Department – Public Counter
201 North Figueroa Street, 3rd Floor
Los Angeles, CA 90012
Phone: (213) 482-7077

San Fernando Valley Office
6262 Van Nuys Boulevard
Van Nuys, CA 91401
Phone: (818) 374-5050

If you have any questions regarding this case, please contact Jane Blumenfeld at (213) 978-1372 or myself at (213) 978-1274.

Sincerely,

CON HOWE
Director of Planning

ROBERT H. SUTTON
Deputy Director

CH/RHS:hkt

Attachment

cc: Council Planning Deputies
Ray Chan, Building and Safety Department
David Kabashima, Department of City Planning
Jane Blumenfeld, Department of City Planning

April 21, 2005

**RAS RELATIONSHIP TO COMMUNITY PLAN FOOTNOTES
DIRECTOR'S INTERPRETATION**

All Interested Parties:

SUBJECT:

Inquiries have been made regarding potential conflicts between Footnotes on the Community Plans and the RAS 3 and RAS 4 (hereafter referred to as RAS) Zones.

BACKGROUND:

The Residential/Accessory Services Zones (RAS) allow a greater floor area than commercial zones and greater height than otherwise allowed in height district 1VL.

“An example is:

Where a traditional C2-1VL with a Commercial plan designation is limited to a 1.5:1 FAR and a 45 height limit, the RAS 3-1VL and RAS 4-1VL shall not exceed a 3:1 FAR and 50 feet in height in accordance with the LAMC 12.10.5, 12.11.5 and 12.21.1.”

The Community Plans as recommend by the City Planning Commission and adopted by City Council are a general guide to development for the community and city as a whole. Rarely do the Community Plans specify special planning rights or restrictions for particular parcels.

Some community plan maps contain footnotes regarding height and floor area. Footnotes appear on the map legend next to the commercial land use categories or in some cases on specific properties or areas. The footnotes that are attached to the commercial land use categories generally relate in a broad-brushed manner to all areas of the plan designated for that particular use. Typically such footnotes are not site specific, and as such, do not relate to specific locations, blocks, or parcels within the community plan area.

“An example of such a footnote which appears in most Community Plans reads:

Footnote 1: ‘Height District 1VL’

This means all properties within the commercial land use category that have this footnote are limited to an FAR of 1.5:1 with a 45-foot height limit.”

DISCUSSION:

When the City Council adopted the RAS Zones in 2002, their purpose was to promote mixed use development in the city's commercial zones, particularly in the commercial corridors which provide the greatest access to transit. In their adoption of the RAS Zones, the City Council recognized that

the additional floor area and height allowed by the RAS zones are necessary to make such primarily residential projects viable. However to protect the integrity of the Community Plans, the Council limited the residential density permitted in the RAS 3 and RAS 4 Zones to correspond to the residential densities permitted in the R3 and R4 Zones, respectively. Thus, they permitted RAS 3 and RAS 4 Zones in Plans that permit R4 and higher zoning but only permitted the RAS 3 Zone (and not RAS 4) in Plans that previously had R3 as the highest zoning category.

In one particular plan, the Plan Footnote on a Neighborhood Commercial area states:

“Floor Area Ratio 1:1.”

In this specific situation it cannot be the intent of Council to allow a 3:1 FAR since they knowingly restricted the property to a 1:1 FAR.

INTERPRETATION:

It is hereby interpreted that the RAS Zones can exceed a Community Plan Footnote when that footnote is general in nature and generally refers to all parcels under that plan category. Where there is a specific footnote that refers to (a) specific parcel(s) that is more restrictive, the RAS Zone would not be permitted without a corresponding Plan Amendment.

Channel Law Group, LLP

February 2, 2026

Supplemental Justification for Appeal of Case No. ZA-2024-5222-CU2-ZBA,
Conditional Use Permit and Zone Boundary Adjustment, and ENV Case No.
2024-5223-CE, 23717 Victory Boulevard (Proposed Starbucks Drive-Through)

EXHIBIT 4



TECHNICAL MEMORANDUM

To: Jamie T. Hall
Channel Law Group, LLP

Date: February 2, 2026

From: Ray Kapahi *RK*
Tel: 916.806.8333
E-Mail: ray.kapahi@gmail.com

Subject: Summary of Air Quality Impacts Associated with Proposed Starbucks Drive-Thru
23717 Victory Blvd., West Valley (Los Angeles County)

INTRODUCTION AND SUMMARY

Environmental Permitting Specialists (EPS) has reviewed the various documents associated with the above noted project. Specifically, EPS has reviewed the following documents and offers the following comments:

- Letter of Determination City of Los Angeles (October 21, 2025)
Comment
There is no discussion of air quality impacts or impacts to public health at homes located just 75 feet West of the drive-up window. Car exhaust from multiple vehicles idling 12 hours/day, 365 days annually would directly impact these homes.
- Site Plans (undated)
- Application Filed 8/15/2024
- Kaidance Group Findings Response (undated)
Comment
Incorrectly asserts project would not adversely affect public health, welfare or safety at adjacent properties. No analysis is provided to support this conclusion.

PROJECT IMPACTS TO AIR QUALITY WILL BE SIGNIFICANT

EPS has completed an air modeling and health risk analysis. The results are summarized below.

Vehicle exhaust from idling vehicles would lead to substantial amount of NO_x, PM₁₀ and CO emissions. EPS analysis determined that 1-hour NO₂ impacts would exceed the federal ambient air quality standards by a substantial margin. It is estimated that NO_x concentrations at the adjacent homes would exceed 450 micrograms per cubic meter. This is more than twice the federal air quality standards designed to protect public health. The adjacent homes that would be impacted are located only 75 feet West of the proposed project. The federal air quality standard is 188 ug/m³. See table of air quality standards shown below

Table 1

Ambient Air Quality Standards						
Pollutant	Averaging Time	California Standards ¹		National Standards ²		
		Concentration ³	Method ⁴	Primary ^{3,5}	Secondary ^{3,6}	Method ⁷
Ozone (O ₃) ⁸	1 Hour	0.09 ppm (180 µg/m ³)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m ³)		0.070 ppm (137 µg/m ³)		
Respirable Particulate Matter (PM ₁₀) ⁹	24 Hour	50 µg/m ³	Gravimetric or Beta Attenuation	150 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m ³		—		
Fine Particulate Matter (PM _{2.5}) ⁹	24 Hour	—	—	35 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m ³	Gravimetric or Beta Attenuation	9.0 µg/m ³	15.0 µg/m ³	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m ³)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m ³)	—	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10 mg/m ³)		9 ppm (10 mg/m ³)	—	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m ³)		—	—	
Nitrogen Dioxide (NO ₂) ¹⁰	1 Hour	0.18 ppm (339 µg/m ³)	Gas Phase Chemiluminescence	100 ppb (188 µg/m ³)	—	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)		53 ppb (100 µg/m ³)	Same as Primary Standard	

Both project level and cumulative (project + background) would be significant. This is especially troubling as Los Angeles County has been classified as “Extreme” non-attainment for the 8-hour ozone standard. NO_x is one main precursor to regional ozone formation. High concentrations of ozone lead to increased levels of asthma and other respiratory diseases. The very young and the elderly are most at risk from these air pollutants.

MODELING METHODOLOGY (NO_x EMISSIONS)

NO_x emissions for the construction phase were modeled using Environmental Protection Agency (EPA) and South Coast Air Quality Management District (SCAQMD) recommended AERMOD dispersion model (Version 24142). The air dispersion model is used to translate an emission rate (e.g., lb/hr) into a concentration (e.g., parts per million or micrograms per cubic meter [ug/m³]).

Other modeling inputs are described below on the next page.

Model Set-Up

The following options were used:

- Use of Calm Wind Processing
- Use of Missing Data Processing
- Averaging Times: 1 hour
- Use of Terrain Adjustment

Modeling Grid and Coordinate System

A rectangular (x-y) Cartesian coordinate system was used. A region 1,225 meters x 1,225 meters (0.76 mile x 0.76 mile) was used. The modeling region divided into 25 meter square cells for a total of 2,500 individual receptors in the vicinity of the project area.

Meteorological Data

Five years of hourly meteorological data (2011 to 2015) were used in the analysis. The surface data (wind speed, wind direction, temperature, etc.) were recorded at Van Nuys airport. SCAQMD provides model ready meteorological files at their web site¹.

Operational (Long-Term) Emissions

Maximum daily emissions of NO_x were estimated assuming 13 vehicles are idling, 18.5 hours per day, 365 days per year.

FINDINGS

Impacts to Air Quality and Significant

The results of this analysis indicate that NO_x emissions during the construction phase would result in ambient concentrations that would violate California's 1-hour ambient air quality standard for NO_x emissions by a wide margin.

The maximum 1-hour concentration and the adjacent homes is estimated to equal 350 ug/m³. When combined with the background concentration (estimated to equal 90 ug/m³) would result in cumulative NO_x impacts in excess of 440 ug/m³.

¹ Available at: <http://www.aqmd.gov/home/air-quality/meteorological-data/data-for-aermod>

Exposure to nitrogen dioxide harms the lungs causing irritation, coughing and worsening of asthma. Children, the elderly and those with respiratory issues are most at risk. In addition, NO₂ forms harmful secondary air pollutants such as ozone (smog) and fine particulate that worsen respiratory and cardiovascular problems.

Impacts to Public Health are Cumulatively Significant

Some of the major toxic air pollutants released from vehicle idling are styrene, 1,3 butadiene, toluene, benzene and xylenes. Collectively, exposure will lead to excess cancer risk of 1 in a million. While this level is below thresholds of significance, when added to the background risk, it is significant. The cumulative cancer risk is estimated to exceed 50 cancers per million. Detailed calculations and modeling files are provided in a separate Technical Memorandum.

CONCLUSIONS

1. Significant impacts to air quality due to continuous emissions of NO_x and other pollutants 365 days per year
2. Impacts to public health are cumulatively significant
3. None of the documents reviewed acknowledged the potential of health impacts to nearby residents located only 75 feet from the drive-thru lane.

Channel Law Group, LLP

March 24, 2026

Justification for CEQA Appeal;
23717 West Victory Boulevard; Case Nos.: ZA-2024-5222-CU2-ZBA;
ENV-2024-5223-CE (“Project”)

EXHIBIT C

Rebuttal Appeal Justification Letter dated February 10, 2026

Channel Law Group, LLP

8383 Wilshire Blvd.
Suite 750
Beverly Hills, CA 90211

Phone: (310) 347-0050
Fax: (323) 723-3960
www.channellawgroup.com

JULIAN K. QUATTLEBAUM, III
JAMIE T. HALL *
CHARLES J. McLURKIN
GREGORY T. WITTMANN

Writer's Direct Line: (310) 982-1760
jamie.hall@channellawgroup.com

*ALSO Admitted in Texas

February 10, 2026

VIA ELECTRONIC MAIL

South Valley Area Planning Commission
200 North Spring Street, Room 763
Los Angeles, CA 90012
apcsouthvalley@lacity.org
henry.chu@lacity.org
stephanie.escobar@lacity.org

Re: Secondary Supplemental Justification for Appeal of Case No. ZA-2024-5222-CU2-ZBA, Conditional Use Permit and Zone Boundary Adjustment, and ENV Case No. 2024-5223-CE, 23717 Victory Boulevard (Proposed Starbucks Drive-Through)

Dear South Valley Area Planning Commission:

This firm represents West Valley Alliance for Optimal Living ("Appellant") with regard to the appeal of the Zoning Administrator's ("ZA") approval of Case No. ZA-2024-5222-CU2-ZBA, and ENV Case No. 2024-5223-CE ("Project Approval"), which authorizes the construction, use, and maintenance of a new 1,479 square-foot Starbucks Drive-Through Coffee Shop at 23717 Victory Boulevard ("Project").

Attached as **Exhibit 1** to this letter is a supplemental expert report from Ray Kapahi of Environmental Permitting Specialists with supporting information related to air quality impacts associated with the Project.

Thank you for your consideration of this matter.

Sincerely,



Jamie T. Hall

Encl.

EXHIBIT 1



TECHNICAL MEMORANDUM

To: Jamie T. Hall
Channel Law Group, LLP

Date: February 3, 2026

From: Ray Kapahi *RK*
Tel: 916.806.8333
E-Mail: ray.kapahi@gmail.com

Subject: Supporting Information Related to Air Quality Impacts Associated with Proposed Starbucks Drive-Thru 23717 Victory Blvd., West Valley (Los Angeles County)

INTRODUCTION

This Technical Memorandum provides supporting information related to an air quality impact analysis summarized in my previous Memorandum (EPS February 2, 2026).

The following information is provided:

- Modeling of NOx emissions from vehicle Idling
- Modeling of toxic air contaminants from vehicle idling

MODELING OF NOx EMISSIONS

NOx emissions for the idling of cars at the proposed drive-thru were modeled using Environmental Protection Agency (EPA) and South Coast Air Quality Management District (SCAQMD) recommended AERMOD dispersion model (Version 24142). The air dispersion model is used to translate an emission rate (e.g., lb/hr) from the idling vehicles into a concentration (e.g., parts per million or micrograms per cubic meter [ug/m3]). The harm to the public is from exposure to concentrations of various air pollutants.

The various modeling inputs are described below on the next page.

Model Set-Up

The following options were used:

- Use of Calm Wind Processing
- Use of Missing Data Processing
- Averaging Times: 1 hour
- Use of Terrain Adjustment

Modeling Grid and Coordinate System

A rectangular (x-y) Cartesian coordinate system was used. The modeling area was divided into 25 meters x 25 meters for a total of 625 individual grid locations. See Figure 1 for a layout of the modeling grid.

Meteorological Data

Six years of hourly meteorological data (2012 to 2016) were used in the analysis. The surface meteorological data (wind speed, wind direction, temperature, etc.) from Van Nuys Municipal Airport as archived by SCAQMD were used. These were obtained from the SCAQMD web site¹.

Operational Emissions

Tailpipe emissions from vehicle idling were modeled as a line source that represents the drive-thru queueing area. See Figure 2. The emission rates are based on vehicle idling emissions calculated using the EMFAC² 2025 model. See Table 1.

Per project specification, the numbers of on-site vehicles that would be in the drive thru would be 13. However, the total number of cars frequently exceed this number as cars routinely queue at offsite areas. A value of 15 vehicles was assumed for this analysis as the value of 13 cars understates actual conditions. The difference in impacts from 13 v. 15 cars, however, is negligible.

FINDINGS

The results of this analysis indicate that NO_x emissions during the construction phase would result in ambient concentrations that would violate both the federal and California's 1-hour NO₂ standard.

The spatial distribution of NO_x around the project site is provided in Figure 3. Area within the contour marked "188" exceed the federal 1-hour NO_x standard of 188 micrograms per cubic meter. A close-up of the same results appears in Figure 4. These results show that adjacent homes would be disproportionately impacted by exhaust from idling cars. Residents in these

¹ Available at: <http://www.aqmd.gov/home/air-quality/meteorological-data/data-for-aermod>

² CARB (2025): EMFAC 2025 Model. Available at: <https://arb.ca.gov/emfac/>

homes would be exposed to elevated concentrations of NOx for 18 hours per day, 365 days per year.

MODELING OF TOXIC AIR CONTAMINANTS

Vehicle exhaust contains not only criteria air pollutants, such as NOx, but also toxic air pollutants³, such as benzene, toluene, 1,3 butadiene. Emissions of toxic air contaminants were calculated based on the speciation data published by CARB³.

These emissions along with plot files created using AERMOD⁴ were input the HARP⁵ risk model to calculate increased in cancer risk to residents living near the project site. The results are reported in terms of cancer risk per million.

FINDINGS

The results of modeling toxic air contaminants is presented in terms of increased cancer risk to residents living near the project site (Table 5). These results indicate an increase cancer risk of 0.5 cancers/million over a 30-year exposure period.

This risk level is below 10 cancers/million that is considered the threshold of significance. However, when added to the background cancer risk, (367 cancers/million)⁶, the project impacts are cumulatively significant.

Homes surrounding the proposed Starbucks are already burdened with the worst air quality in the Nation and a high background cancer risk levels. Emissions from the proposed Starbucks drive-thru makes this situation worse.

COPIES OF MODELING FILES

Electronic copies of two sets of modeling files are attached. The first one is for NOx impacts. The second one is for risk calculations using the HARP model.

³ CARB (2013): Organic Gas Speciation Profiles for Catalyzes Gasoline Powered Vehicles. Available at: https://ww2.arb.ca.gov/sites/default/files/2024-01/cate6running_og2303%2604.pdf

⁴ The description of the AERMOD Dispersion Model is available at <https://www.dropbox.com/scl/fi/d6d7k8guk4u0qutedcrdo/Description-of-AERMOD-Dispersion-Model.pdf?rlkey=me2yy95tkrh8laoy2zo7v3rt7&st=24t9mqtu&dl=0>

⁵ CARB (2025): HARP Air Dispersion Modeling and Risk Tool. Available at: <https://ww2.arb.ca.gov/resources/documents/harp-air-dispersion-modeling-and-risk-tool>

⁶ SCAQMD (2015): MATES IV Final Report. Available at: https://www.aqmd.gov/docs/default-source/air-quality/air-toxic-studies/mates-iv/mates-iv-final-draft-report-4-1-15.pdf?sfvrsn=48caf361_7

Table 1
Summary of Vehicle Emissions from Idling

IDLING EMISSIONS			
No. of Vehicles		Max. 15 Typically 13	15
Emissions Occur Over			18.5 hrs/day 365 days/yr
Emission Factor for Vehicle Idling			Emission Factor Emissions Units (grams/vehicle-hr)
NOx			31.93 1.33E-01 gram/sec
CO			67.081 2.80E-01 gram/sec
PM10			0.0389 1.62E-04 gram/sec
VOC			13.713 5.71E-02 gram/sec
			4.53E-01 lb/hr
			8.38E+00 lb/day
			3.06E+03 lb/yr

493	2025 Annual	Los Angeli NonTruck		IDLEX	PM2_5	0.037042
494	2025 Annual	Los Angeli NonTruck		IDLEX	PM10	0.038908
495	2025 Annual	Los Angeli NonTruck		IDLEX	PM	0.039694
496	2025 Annual	Los Angeli NonTruck		IDLEX	CH4	5.165944
497	2025 Annual	Los Angeli NonTruck		IDLEX	CO2	6665.332
498	2025 Annual	Los Angeli NonTruck		IDLEX	ROG	6.59474
499	2025 Annual	Los Angeli NonTruck		IDLEX	TOG	13.71324
500	2025 Annual	Los Angeli NonTruck		IDLEX	SOx	0.053265
501	2025 Annual	Los Angeli NonTruck		IDLEX	NOx	31.93444
502	2025 Annual	Los Angeli NonTruck		IDLEX	CO	67.08178
503	2025 Annual	Los Angeli NonTruck		IDLEX	HC	12.76472

Table 2
Summary of TAC Emissions

VOC Emissions (from Table 1)		4.53E-01	lb/hr
		3,059	lb/yr

TAC	Weigh (%)	Emissions	
		lb/HR	lb/yr

1,3 Butadiene	0.2427	1.10E-03	3.36E-02
Acetaldehyde	0.9	4.08E-03	1.25E-01
Benzene	3.89	1.76E-02	5.39E-01
Styrene	0.219	9.92E-04	3.04E-02
Toluene	4.754	2.15E-02	6.59E-01
Xylenes	5.073	2.30E-02	7.03E-01

Gasoline Powered Vehicle. OG2303 and OG 2304. Available at:
https://ww2.arb.ca.gov/sites/default/files/2024-01/cate6running_og2303%2604.pdf

Figure 1: Layout of Modeling Grid

The Blue Mark Indicates Project Location

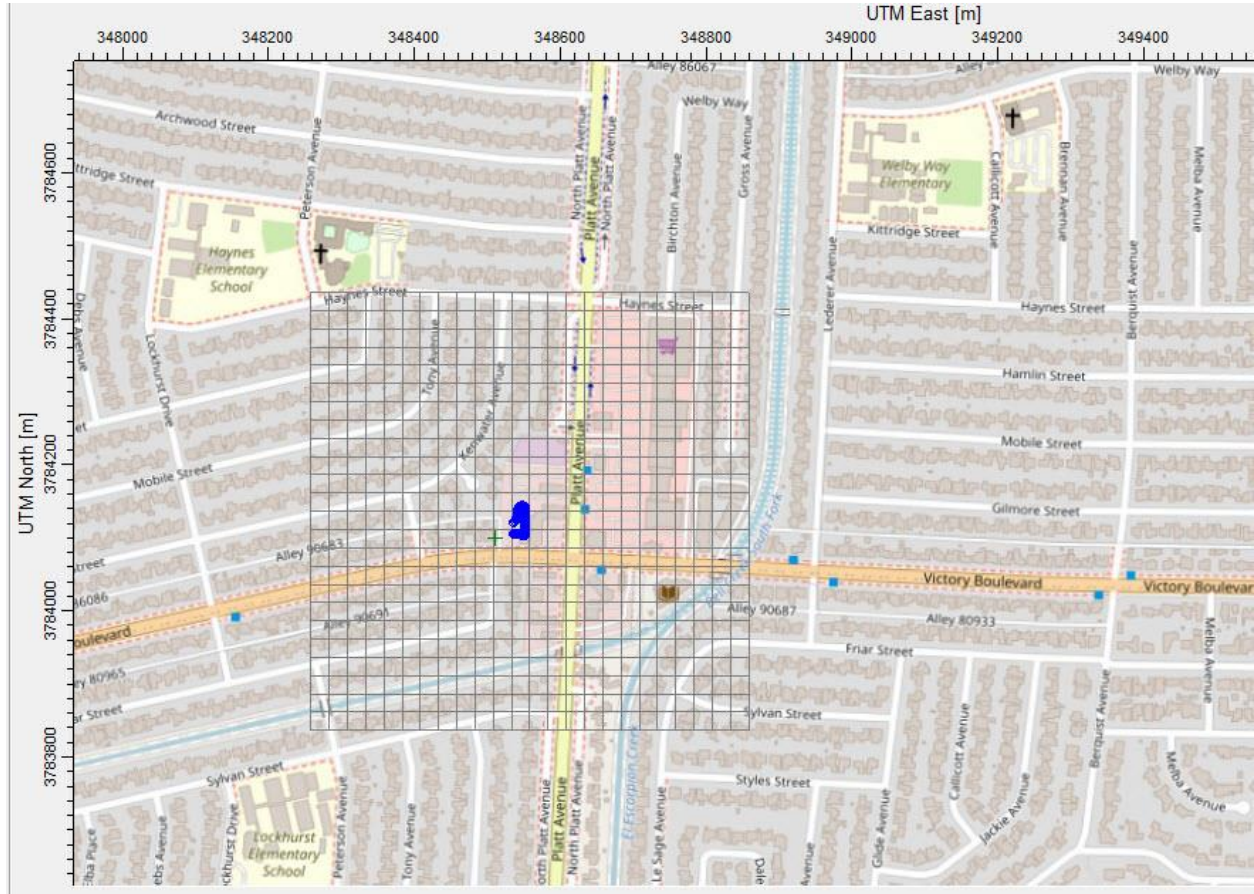
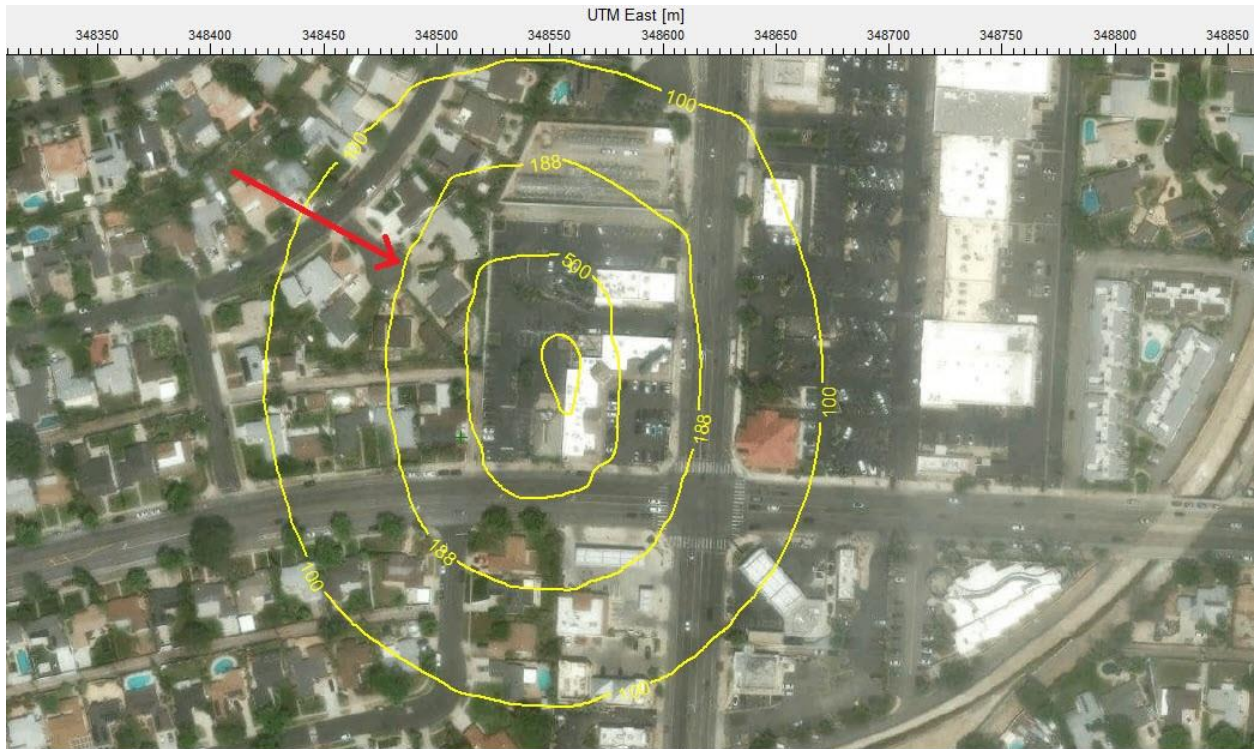


Figure 3: Spatial Distribution of 1-Hour NO₂
Concentration in Micrograms per Cubic Meter



Note: Area inside the contour labeled "188) exceed the federal 1-hour ambient air quality standard for NOs

Figure 4: Spatial Distribution of 1-Hour NO₂ (Close-Up)

Concentration in Micrograms per Cubic Meter



Figure 5: Spatial Distribution of 30 Year Cancer Risk
(Operational Phase)

(Cancers per Million)



Channel Law Group, LLP

March 24, 2026

Justification for CEQA Appeal;
23717 West Victory Boulevard; Case Nos.: ZA-2024-5222-CU2-ZBA;
ENV-2024-5223-CE (“Project”)

EXHIBIT D

South Valley APC Hearing PowerPoint Presentation

PROPOSED STARBUCKS DRIVE-THROUGH

23717 VICTORY BLVD

CASE NO. ZA-2024-5222-CU2-ZBA; ENV-2024-5223-CE

APPEAL TO THE SOUTH VALLEY AREA
PLANNING COMMISSION

FEBRUARY 12, 2026



CITY OF LOS ANGELES CALIFORNIA
KAREN BASS
MAYOR

OFFICE OF ZONING ADMINISTRATION
200 K. SPRING STREET, ROOM 763
LOS ANGELES, CA 90012-4801
(213) 978-1318

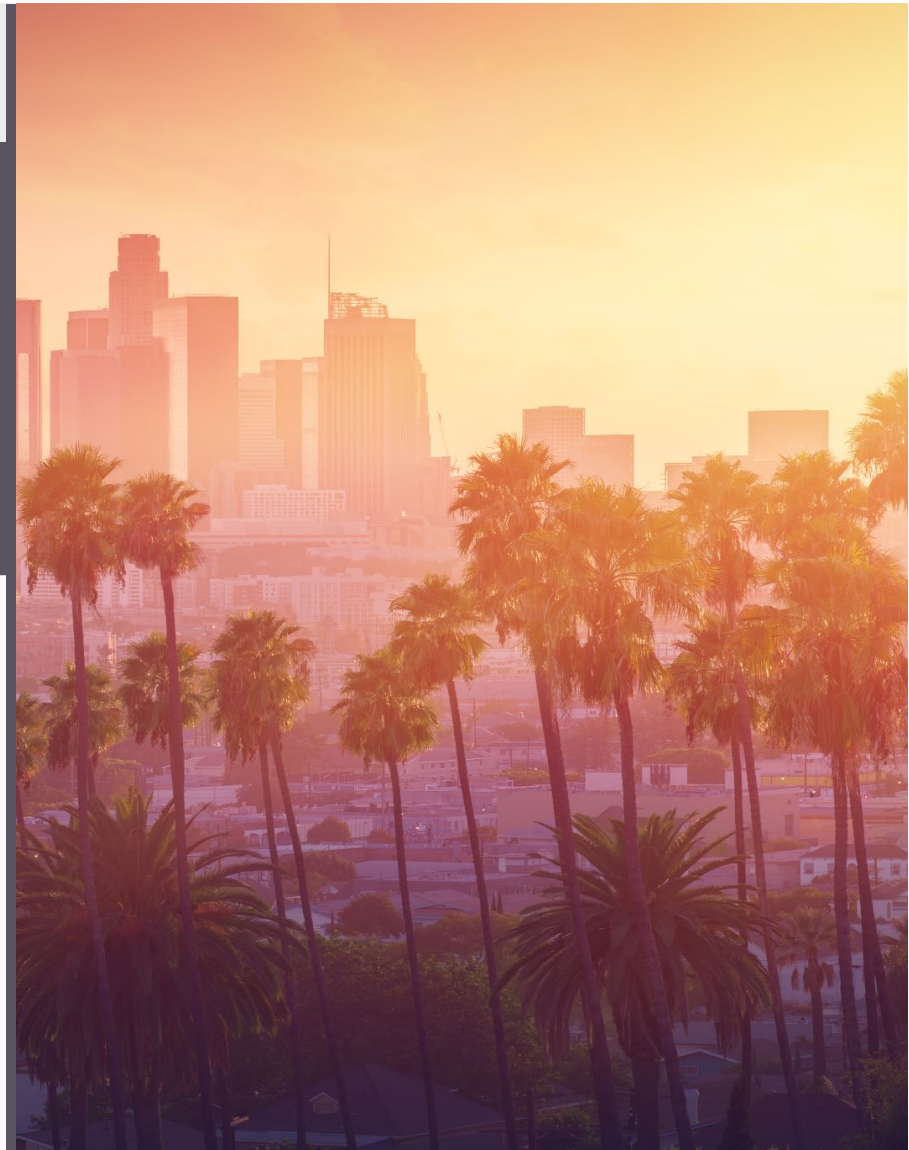
ESTINEH MAILIAN
CHIEF ZONING ADMINISTRATOR

ASSOCIATE ZONING ADMINISTRATORS
Estineh Mailian, Jiumanna Annow, Dorinda Zoning Administrators,
Jominana Rein, Cawian Administratos, Haimada Zoning Administrators,
Samima Chanant, Asociats Zoning Administrator,

Decision Date: October 21, 2025

Who is the Appellant – West Valley Alliance for Optimal Living?

- **West Valley Alliance for Optimal Living is a not-for-profit unincorporated association whose members have a direct and substantial beneficial interest in ensuring that the City complies with laws relating to environmental protection and orderly growth of the City**





PROCEDURAL BACKGROUND

OFFICE OF ZONING ADMINISTRATION
200 N. SPRING STREET, ROOM 703
LOS ANGELES, CA 90012-4801
(213) 875-1318

ESTINEH MAILLAN
CHIEF ZONING ADMINISTRATOR
ASSOCIATE ZONING ADMINISTRATORS
JACK CHING
HENRY CHU
TIM FARGO
JONATHAN A. HERGHEY, AICP
PHYLLIS NATHANSON
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CITY OF LOS ANGELES
CALIFORNIA



KAREN BASS
MAYOR

LOS ANGELES DEPARTMENT
OF CITY PLANNING
EXECUTIVE OFFICES
VINCENT P. BERTONI, AICP
DIRECTOR

SHANA M.M. BONSTIN
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DEPUTY DIRECTOR
LISA M. WEBBER, AICP
DEPUTY DIRECTOR
planning.lacity.org

Decision Date: October 21, 2025

Last Day to Appeal: November 5, 2025

Appeal Period Ends:

Bennett Lefebvre (A)
Starbucks Coffee Company
2401 Utah Avenue South
Seattle, WA 98134

Megdal Pizzas, LLC (O)
A California limited liability company
c/o Elliot Megdal
252 South Beverly Drive, Ste C
Beverly Hills, CA 90212-3901

Ryan Abraham (R)
Kaidence Group
5070 North 40th Street, Unit 210
Pheonix, AZ 85018

CASE NO. ZA-2024-5222-CU2-ZBA
CLASS 2 CONDITIONAL USE PERMIT,
ZONE BOUNDARY ADJUSTMENT
23717 West Victory Boulevard
Canoga Park–Winnetka–Woodland Hills–
West Hills
Zone: QC1-1VL and P-1VL
C.D. : 12 – Lee
D.M. : 180B093
CEQA: ENV-2024-5223-CE
Legal Description: Lot B, Tract PM 3275

Pursuant to California Environmental Quality Act, I hereby **DETERMINE**:

based on the whole of the administrative record, that the Project is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines, Sections 15301, (Class 1) and 15305 (Class 5) and there is no substantial evidence demonstrating that any exceptions contained in Section 15300.2 of the State CEQA Guidelines regarding location, cumulative impacts, significant effects or unusual circumstances, scenic highways, or hazardous waste sites, or historical resources applies; and

September 6, 2025


- ❖ Zoning Administrator Hearing
- ❖ Public testimony provides substantial evidence that the project use is an inadequate fit for a site so constrained, contradicting the finding of no adverse effect on public safety and vehicular circulation.

October 21, 2025

- ❖ Zoning Administrator Approves Project
- ❖ Letter of Determination Issued

APPLICATIONS

APPEAL APPLICATION
Instructions and Checklist



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CASE
Case No

APN: 2

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Channel Law Group, LLP

8383 Wilshire Blvd.
Suite 750
Beverly Hills, CA 90211
Phone: (310) 347-0050
Fax: (310) 723-0960
www.channelgroup.com

Writer's Direct Line: (310) 982-1700
jamie.kelli@channelgroup.com

JULIAN K. QUATTLEBAUM III
JAMIE T. HALL*
CHARLES J. MULLERKIN
GREGORY T. WITTMANN
*ALSO ADMITTED IN TEXAS

February 2, 2026

VIA ELECTRONIC MAIL
South Valley Area Planning Commission
200 North Spring Street, Room 763
Los Angeles, CA 90012
apcsouthvalley@lacity.org
henry.chu@lacity.org
stephanie.escobar@lacity.org

Re: Supplemental Justification for Appeal of Case No. ZA-2024-5222-CU2-ZBA, Conditional Use Permit and Zone Boundary Adjustment, and ENV Case No. 2024-5223-CE, 23717 Victory Boulevard (Proposed Starbucks Drive-Through)

Dear South Valley Area Planning Commission:

This firm represents West Valley Alliance for Optimal Living ("Appellant"), a not-for profit unincorporated association. Appellant and its members have a direct and substantial beneficial interest in ensuring that the City of Los Angeles ("City") complies with laws relating to environmental protection and orderly growth of the City.

This supplemental letter¹ continues to outline the justifications for appeal of the Zoning Administrator's ("ZA") approval of Case No. ZA-2024-5222-CU2-ZBA, and ENV Case No. 2024-5223-CE ("Project Approval"), which authorizes the construction, use, and maintenance of a new 1,479 square-foot Starbucks Drive-Through Coffee Shop at 23717 Victory Boulevard ("Project"). The project site is zoned P-1VL and QC1-1VL ("Project Site"). The Project Site is located within the Canoga Park-Winnetka-Woodand Hills-West Hills Community Plan ("Community Plan"). The subject site is also within an Urban and Built-up Land zone, Outside Flood zone, Urban Agriculture

¹ In addition to providing the precise bases for the City's failure to proceed in the manner required by the California Environmental Quality Act, this letter is also intended to provide pre-suit notification to the City to the extent such notification may be required. The City may remedy the errors identified herein by not deeming the project exempt from CEQA and instead preparing an environmental report for the Project. Appellant will provide the City with a reasonable opportunity to correct these errors by not commencing litigation for at least 14 days after the City's final approval of the Project (should that occur).

November 5, 2025

❖ Appeal Timely Filed

February 2, 2026

❖ Supplemental Justification for Appeal Timely Filed with Expert Reports:

❖ *Steve Rogers Acoustics Noise Report*

❖ *Environmental Permitting Specialists Air Quality / GHG Report*

Project Site: Intersection of Platt Ave & Victory Blvd

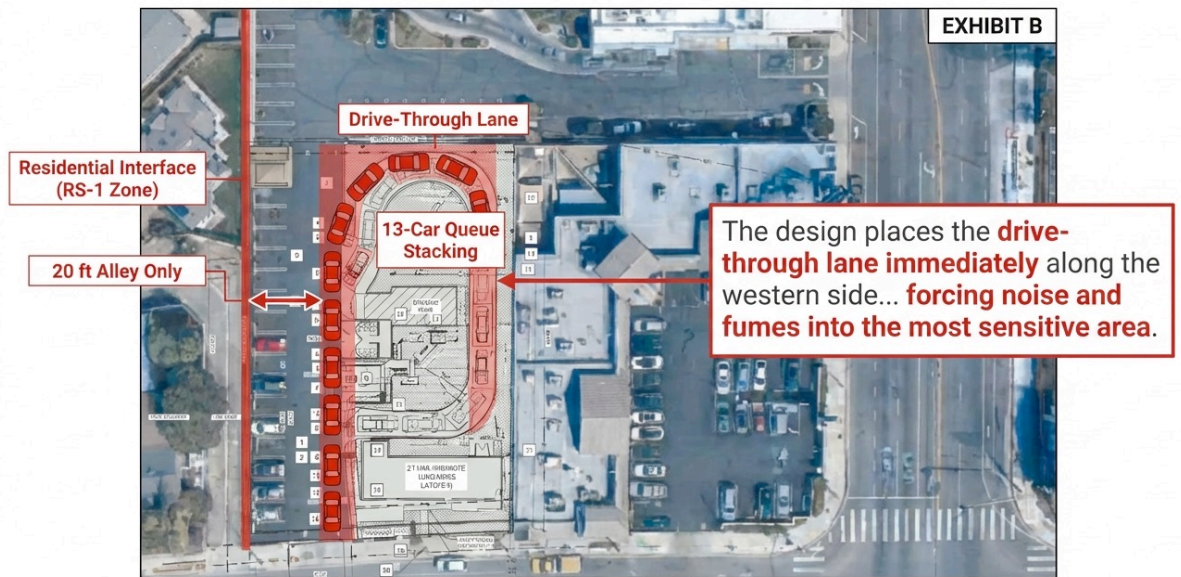


Intersection already has McDonald's, Coffee Bean & Tea Leaf, Subway, etc. Project site was previously a Pizza Hut (pictured). An existing Starbucks already exists across from the project site.

THE PROPOSED PROJECT WOULD INTRODUCE A NEW DRIVE-THROUGH STARBUCKS WITH A SHARED DRIVEWAY WITH THE EXISTING MCDONALD'S.



THE PROPOSED PROJECT IS ADJACENT TO RESIDENTIAL USES



The background features a vertical line on the left side and a horizontal bar at the bottom. The horizontal bar is divided into a blue square on the left and a dark grey rectangle on the right. The rest of the background is a light grey gradient.

WHAT ARE THE
REQUIRED FINDINGS?

Required Conditional Use Permit Findings

1. The project will enhance the built environment in the surrounding neighborhood or will perform a function or provide a service that is essential or beneficial to the community, city or region.
2. The project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare and safety.
3. The project substantially conforms with the purpose, intent and provisions of the General Plan, the applicable community plan, and any specific plan.


OFFICE OF ZONING ADMINISTRATION
200 N. SPRING STREET, ROOM 763
LOS ANGELES, CA 90012-4801
(213) 678-1318

ESTREIN MALLIAN
CHIEF ZONING ADMINISTRATOR

ASSOCIATE ZONING ADMINISTRATORS

JACK CHANG
HENRY DAU
TIM FARGO
JONATHAN A. HERSHEY, AICP
PHYLLIS NATHANSON
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CALIFORNIA



KAREN BASS
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LOS ANGELES DEPARTMENT OF CITY PLANNING
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VINCENT P. BERTONAL, AICP
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DEPUTY DIRECTOR
planning@cityofla.org

Decision Date: October 21, 2025
Last Day to Appeal: November 5, 2025
Appeal Period Ends:

Bennett Lefebvre (A) CASE NO. ZA-2024-5222-CU2-ZBA

Starbucks (Seattle, WA)
2401 Utah
Seattle, WA

Megdal Pizzeria (California)
A California
c/o Elliot M...
252 South f...
Beverly Hill

Ryan Abraham (Phoenix, AZ)
Kaidence G...
5070 North
Phoenix, AZ

Pursuant to

base
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evide
State
or unusual circumstances, scenic highways, or hazardous waste sites, or historical resources applies; and

CONDITIONAL USE FINDINGS

1. The project will enhance the built environment in the surrounding neighborhood or will perform a function or provide a service that is essential or beneficial to the community, city or region.

The subject property is an irregular-shaped 23,478 square-foot lot with approximately 126 feet of frontage along Victory Boulevard. Approximately 8,125 square feet of that lot area is within the QC1-1VL Zone, while approximately 15,353 square feet of that lot area is within the P-1VL Zone. The property is currently improved with a vacant, approximately 2,135 square-foot restaurant, one (1) non-conforming trash enclosure, two (2) wireless cell towers and the remaining site consists of existing parking lot.

The project site is located within the Canoga Park – Winnetka – Woodland Hills – West Hills Community Plan. The Community Plan designates the site for Community Commercial land uses corresponding to the CR, C2, C4, RAS3 and RAS4. The subject property is split-zoned QC1-1VL and P-1VL and is thus consistent with the land use designation on the site. The subject site is also located within an Urban and Built-up Land zone, Outside Flood zone, Urban Agriculture Incentive zone, and is located within 13.47 km from the Malibu Coast Fault.

Required Drive-Through Establishment Findings

4. That residential uses in the vicinity of a proposed drive-through fast-food establishment will be adequately protected from any significant noise resulting from outdoor speakers, autos, or other sources of noise associated with the lot.
5. That all stationary light generated on the lot is screened to avoid any significant adverse impact on nearby residential uses.
6. That trash storage, trash pickup hours, driveways, parking locations, screening walls, trees and landscaping are provided for and located so as to minimize disturbance to the occupants of nearby residential uses, and to enhance the privacy of those uses.

OFFICE OF ZONING ADMINISTRATION
200 N. SPRING STREET, ROOM 703
LOS ANGELES, CA 90012-4891
(213) 878-1318

CITY OF LOS ANGELES
CALIFORNIA

LOS ANGELES DEPARTMENT
OF CITY PLANNING
EXECUTIVE OFFICES
VINCENT P. BERTONAL, AICP
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ARTHUR L. VARMA, AICP
DEPUTY DIRECTOR
LISA M. WEBBER, AICP
DEPUTY DIRECTOR
blanning@cityofla.org

KAREN BASS
MAYOR

Decision Date: October 21, 2025
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Appeal Period Ends:

Bennett Lefebvre (A)
Starbucks Coffee Company

CASE NO. ZA-2024-5222-CU2-ZBA
CLASS 2 CONDITIONAL USE PERMIT.

DRIVE-THROUGH ESTABLISHMENT FINDINGS

4. That residential uses in the vicinity of a proposed drive-through fast-food establishment will be adequately protected from any significant noise resulting from outdoor speakers, autos, or other sources of noise associated with the lot.

There is a 20-foot alleyway located west of the subject site that separates the subject site from the residential uses. The project includes a design that not only enhances the aesthetics of the site but also takes into consideration of having residential uses near the site.

The site has an existing cross-access easement with the parcel to the North (currently operating as a McDonalds Café with Drive Through), which runs from the McDonald's site on the south side through the proposed site to Victory Boulevard.

the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines, Sections 15301, (Class 1) and 15305 (Class 5) and there is no substantial evidence demonstrating that any exceptions contained in Section 15300.2 of the State CEQA Guidelines regarding location, cumulative impacts, significant effects or unusual circumstances, scenic highways, or hazardous waste sites, or historical resources applies; and

Required Mini-Shopping Center/Commercial Corner Findings

7. That based on data provided by the City Department of Transportation or by a licensed traffic engineer, that ingress to and egress from the project will not create a traffic hazard or cause significant traffic congestion or disruption of vehicular circulation on adjacent streets.
8. That project approval will not create or add to a detrimental concentration of Mini-Shopping Centers or Commercial Corner Developments in the vicinity of the proposed project.

OFFICE OF ZONING ADMINISTRATION
200 N. SPRING STREET, ROOM 703
LOS ANGELES, CA 90012-4801
(213) 978-1318

CITY OF LOS ANGELES
CALIFORNIA

LOS ANGELES DEPARTMENT
OF CITY PLANNING
EXECUTIVE OFFICES
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Bennett Lefebvre (A)
Starbucks Coffee Company
2401 N
Seattle

Megd
A Calif
o/o Ell
252 S
Bever

Ryan
Kaidel
5070 N
Pheor

Pursuar
b

CASE NO. ZA-2024-5222-CU2-ZBA
CLASS 2 CONDITIONAL USE PERMIT.

**MINI-SHOPPING CENTER/COMMERCIAL CORNER FINDINGS PURSUANT TO
LAMC CHAPTER 1, SECTION 12.24 W.27**

7. That based on data provided by the City Department of Transportation or by a licensed traffic engineer, that ingress to and egress from the project will not create a traffic hazard or cause significant traffic congestion or disruption of vehicular circulation on adjacent streets.

The subject property is an irregular-shaped 23,478 square-foot lot with approximately 126 feet of frontage along Victory Boulevard. Approximately 8,125 square feet of that lot area is within the QC1-1VL Zone, while approximately 15,353 square feet of that lot area is within the P-1VL Zone. The property is currently improved with a vacant, approximately 2,135 square-foot previously utilized by Pizza Hut restaurant, one (1) non-conforming trash enclosure, two (2) wireless cell towers and the remaining site consists of existing parking lot.

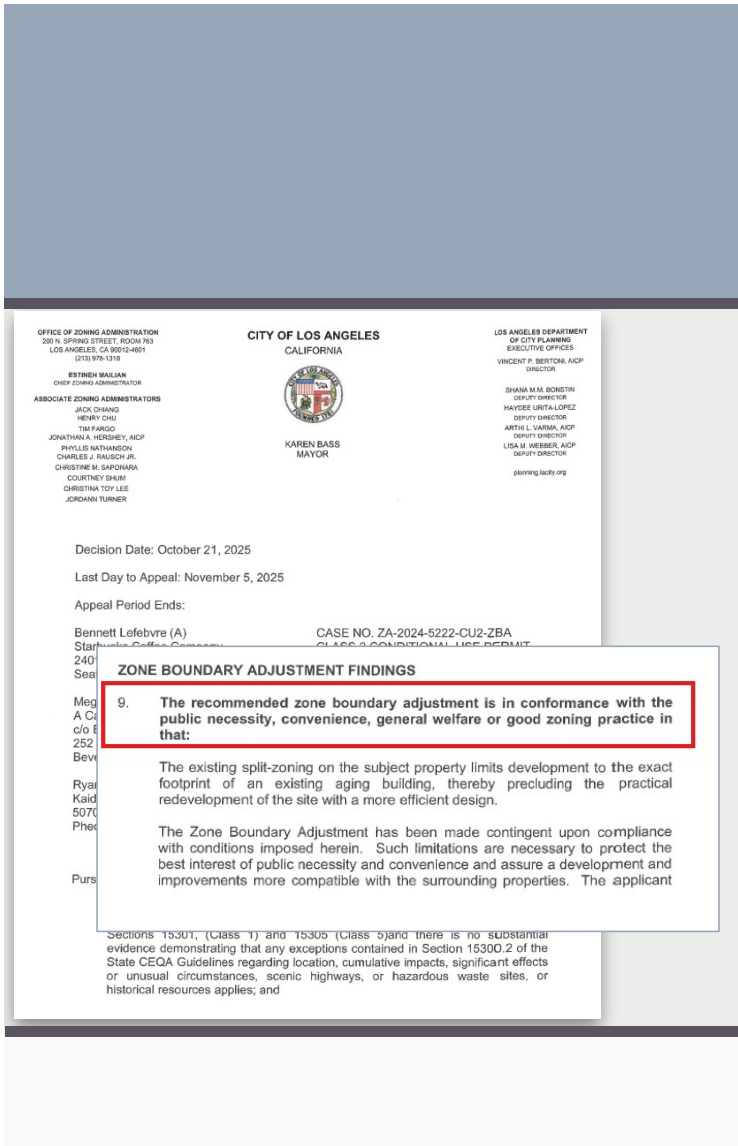
the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines, Sections 15301, (Class 1) and 15305 (Class 5) and there is no substantial evidence demonstrating that any exceptions contained in Section 15300.2 of the State CEQA Guidelines regarding location, cumulative impacts, significant effects or unusual circumstances, scenic highways, or hazardous waste sites, or historical resources applies; and

Required Zone Boundary Adjustment Findings

9. The recommended zone boundary adjustment is in conformance with the public necessity, convenience, general welfare or good zoning practice in that:

The existing split-zoning on the subject property limits development to the exact footprint of an existing aging building, thereby precluding the practical redevelopment of the site with a more efficient design.

The Zone Boundary Adjustment has been made contingent upon compliance with conditions imposed herein...



JUSTIFICATIONS FOR APPEAL

THE FINDINGS ARE NOT SUPPORTED BY SUBSTANTIAL
EVIDENCE



**ERROR ON FINDING #2
(COMPATIBILITY)**

The ZA incorrectly found the project “compatible” despite 4:30 AM operations, 18-hour cycles, and physically insufficient noise buffers.



**ERROR ON FINDING #7
(TRAFFIC HAZARDS)**

The ZA found “no traffic hazard” while simultaneously extreme mitigation measures (human traffic control) that prove the hazard exists.



**ERROR ON CEQA
(EXEMPTION)**

The “Unusual Circumstances” of the site layout, proximity to RS-1, and intensity of use legally preclude a Class 32 Exemption.

**THE
FINDINGS
ARE FLAWED**

Conditional Use Finding No. 2 is Not Adequately Supported

THE ZA FINDING (LOD Page 17)

“The project... will be compatible with and will not adversely affect or further degrade adjacent properties.”

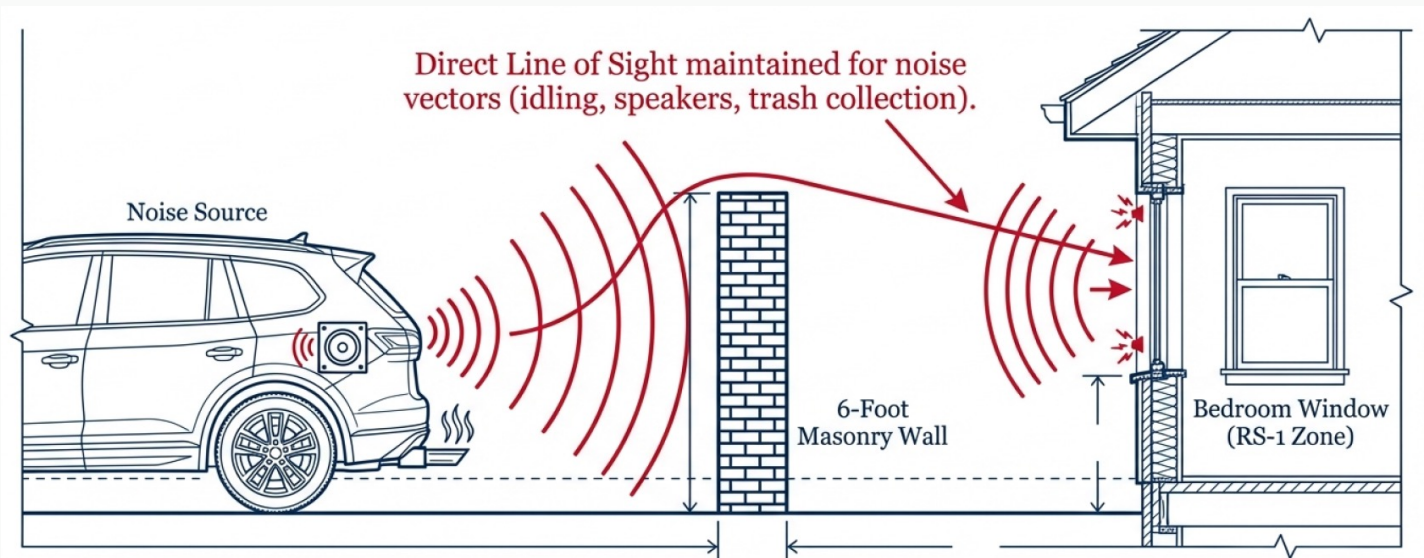
A high-turnover drive-through is fundamentally incompatible with the quiet enjoyment of RS-1 homes during pre-dawn and late-night hours.

“The ZA provides no supporting evidence for the claim that a 6-foot high wall and a screen around the rooftop HVAC equipment will be sufficient to eliminate adverse noise impacts in the neighboring homes or to ensure that those residential properties are not degraded by the noise of drive-through operations, which include nighttime operations.”

“Conditions 17 and 18 address the noise impact of outdoor speakers...but not the main sources of noise impact...namely, the steady flow of vehicles through the drive-through...”

(Steve Rogers Acoustics Report)

Drive-Through Finding No. 4 is Not Adequately Supported



“A 6-foot high wall... will provide no meaningful reduction in noise.”

— Steve Rogers Acoustics

Mini- Shopping Center/ Commercial Corner Finding No. 7 is Flawed

FACTUAL ERROR: The ZA found the project “will not create a traffic hazard” (LOD pg. 24).

REALITY: The project introduces 789 Daily Trips and 127 Peak Hour Trips to an already busy intersection.

Public testimony confirmed existing history of accidents and speeding.

Table A: 23717 Victory Blvd Project Trip Generation

Land Use	Size	Daily Total	AM Peak Hour Total	PM Peak Hour Total
Maintenance/Storage	460 sq.ft	212	56	73
Public	100 sq.ft	100	16	20
Equipment	200 sq.ft	488	44	17
Communication & Printing Entities	13-ft ft.- 24.5 ground	72	0	0
Organizations or Communication	300 sq.ft	100	11	0
Comments & Entities	430 sq.ft	129	16	3
Beresagne Service	137 sq.ft	109	6	3
Other	13-ft ft.- 24.5 ground	88	13	4
Total		789	127	44

The ZA claims there is “no traffic hazard” **YET** mandates the following Conditions (LOD pg. 25):

CONDITIONS

- **Condition 27: Mandated RIGHT TURN ONLY Egress.**
- **Condition 28: Mandated EMPLOYEE TO FACILITATE TRAFFIC MOVEMENT when queue exceeds 13 cars.**

The necessity of mandating signage, traffic measures, and employee facilitation demonstrates that, **without** these measures, the Project **would** create a traffic hazard or significant disruption.

Conditions Prove the Hazard

A Focused Traffic
Analysis Should be
Required

- 1. The Project is ineligible for Categorical Exemptions (Class 1 & Class 5).
- 2. The Project is subject to CEQA Exceptions due to “Unusual Circumstances” (Proximity & Intensity).
- 3. The City cannot “condition away” environmental impacts to avoid analysis.

**THE PROJECT
IS NOT
EXEMPT FROM
CEQA**

What Does the Class 1 Categorical Exemption Say?

The Project is
Not Eligible for
Class 1
Categorical
Exemption

Cal. Code Regs. Tit. 14, § 15301 - Existing Facilities

[State Regulations](#) [Compare](#)

Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. The types of "existing facilities" itemized below are not intended to be all-inclusive of the types of projects which might fall within Class 1. The key consideration is whether the project involves negligible or no expansion of use.

“negligible or no expansion of use”

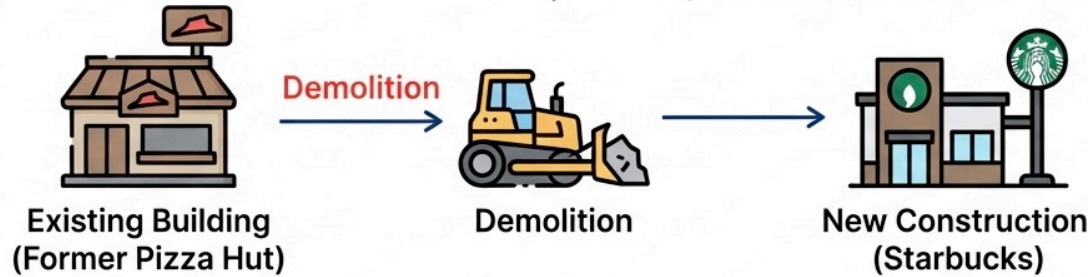
Error : Inapplicability of Class 1 (Existing Facilities)

THE LAW

CEQA Class 1 applies to the operation, repair, maintenance, or minor alteration of existing structures with “negligible or no expansion of use.”

THE FACTS

- Existing Site: Vacant, 2,135 sq. ft. former Pizza Hut.
- Proposed Project: Demolition of existing building. New Construction of a 1,479 sq. ft. Starbucks Drive-Through.



What Does the Class 5 Categorical Exemption Say?

The Project is
Not Eligible for
Class 5
Categorical
Exemption

"minor alterations in land use limitations"

Class 5 consists of minor alterations in land use limitations in areas with an average slope of less than 20%, which do not result in any changes in land use or density, including but not limited to:

- (a) Minor lot line adjustments, side yard, and set back variances not resulting in the creation of any new parcel;
- (b) Issuance of minor encroachment permits;
- (c) Reversion to acreage in accordance with the Subdivision Map Act.

Project Reality: Demolition & New High-Intensity Use



Project Specifications

- **Action:** Demolition of vacant Pizza Hut (2,135 sq. ft.) & New Construction of Starbucks (1,479 sq. ft.)
- **Intensity:** 13-car drive-through queue capacity
- **Operations:** 4:30 AM – 11:00 PM (Fri-Sun)

NOT A REMODEL

What Does the Unusual Circumstances Exemption Say?

“Unusual Circumstances” Exception Precludes Usage of a Categorical Exemption

Cal. Code Regs. Tit. 14, § 15300.2 - Exceptions

[State Regulations](#) [Compare](#)

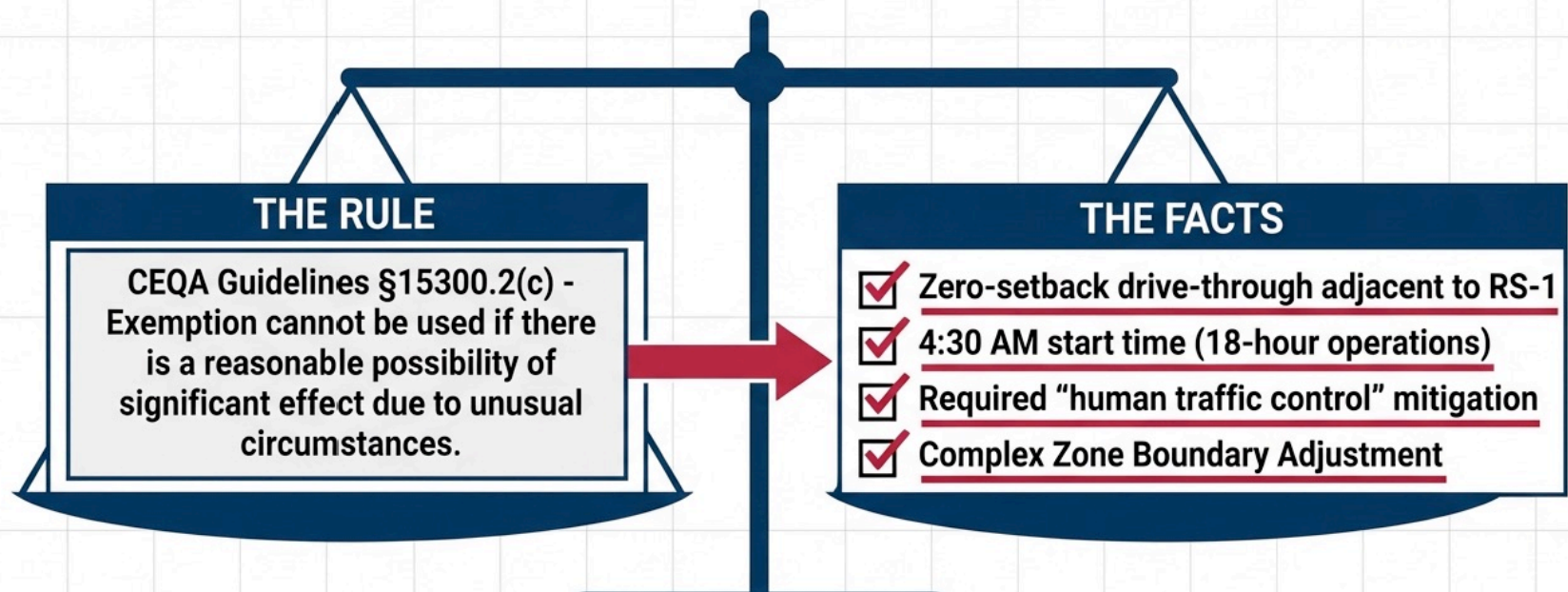
(a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located—a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

(b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

(c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a [significant effect on the environment due to unusual circumstances](#).

“significant effect on the environment due to unusual circumstances”

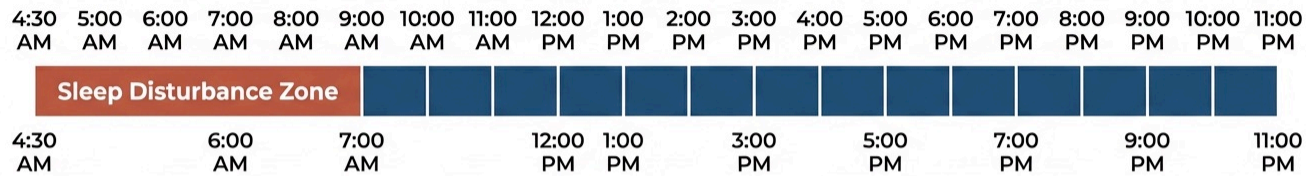
CEQA Error: “Unusual Circumstances” Prohibit Exemption





EXPERT REPORTS
PREPARED BY
APPELLANT
DOCUMENT
SIGNIFICANT
EFFECTS DUE TO
UNUSUAL
CIRCUMSTANCES

Operational Noise Sources (4:30 AM – 11:00 PM)



Ordering Speakers

Condition 17 addresses speakers, but not the human interaction of staff taking orders outside when the queue exceeds 13 cars.



Impulsive Noise

Car doors slamming, remote locking “chirps”, engines starting.



Queue Noise

13+ cars idling adjacent to the property line. Expert report states these sources are “much more significant than the speaker box.”

Significant Effects Relating to Noise

Steve Rogers
Acoustics Report

Evidence of Significant Effect: Air Quality

Source: Environmental Permitting Specialists / Ray Kapahi (Exhibit 4)

Key Finding: Exhaust from the 13-car queue would exceed the 1-hour NOx standards.

Exposure: Adjacent homes (60-75 feet away) would face vehicle exhaust 18 hours per day, 365 days per year.

“Residents... are only 60 feet from the drive-through lane and would be at the highest risk.”

Ambient Air Quality Standards						EXHIBIT 4
Pollutant	Averaging Time	California Standards ¹		National Standards ²		
		Concentration ³	Method ⁴	Primary ^{3,5}	Secondary ^{3,6}	Method ⁷
Ozone (O ₃) ⁸	1 Hour	0.09 ppm (180 µg/m ³)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m ³)		0.070 ppm (137 µg/m ³)		
Respirable Particulate Matter (PM ₁₀) ⁹	24 Hour	50 µg/m ³	Gravimetric or Beta Attenuation	150 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m ³		—		
Fine Particulate Matter (PM _{2.5}) ⁹	24 Hour	—	—	35 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m ³	Gravimetric or Beta Attenuation	9.0 µg/m ³		
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m ³)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m ³)	—	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10 mg/m ³)		9 ppm (10 mg/m ³)		
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m ³)		—		
Nitrogen Dioxide (NO ₂) ¹⁰	1 Hour	0.18 ppm (339 µg/m ³)	Gas Phase Chemiluminescence	100 ppb (188 µg/m ³)	—	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)		53 ppb (100 µg/m ³)		

Significant Effects Relating to Air Quality

Environmental Permitting Specialists Report

A Direct Threat to Public Health, Safety, and Quality of Life

The Zoning Administrator's approval of an intensive drive-through use on this constrained, split-zoned lot **violates the Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan** and introduces **unmitigated hazards** to an established neighborhood.



1. Public Safety (Traffic)

Gridlock at Victory & Platt; reliance on **human traffic control** to manage **illegal queuing**.



2. Environmental Health

Toxic emissions and noise just 20ft from homes. Operations begin at **4:30 AM**.



3. Community Integrity

"Square peg in a round hole" spot zoning that encroaches on RS-1 Low Residential zones.

WELFARE IMPACT

The mandate of the SVAPC is to make findings based on evidence. The evidence shows this project **degrades the welfare** of West Valley residents.

CONCLUSION & REQUEST FOR ACTION

We respectfully request the Commission:

1. **GRANT** the appeal ✓
2. **OVERTURN** the Letter of Determination ✗
3. **DENY** the Conditional Use Permit ✗

Channel Law Group, LLP

March 24, 2026

Justification for CEQA Appeal;
23717 West Victory Boulevard; Case Nos.: ZA-2024-5222-CU2-ZBA;
ENV-2024-5223-CE (“Project”)

EXHIBIT E

Transcript of South Valley APC Hearing (February 12, 2026)

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SOUTH VALLEY AREA PLANNING COMMISSION

Thursday, February 12, 2026

ITEM NO. (6)

ZA-2024-5222-CU2-ZBA-1A
CEQA: ENV-2024-5223-CE

MARVIN BRAUDE SAN FERNANDO VALLEY
CONSTITUENT SERVICE CENTER
6262 VAN NUYS BOULEVARD, MEETING ROOM 1B
VAN NUYS, CALIFORNIA 91401

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P R O C E E D I N G S

--oOo--

(00:04:00 - 00:59:55)

COUNCILMEMBER BARRAZA: Okay. We will restart with item number 6. Item number 6 is case number ZA-2024-5222-CU2-ZBA-1A, an environmental case ENV-2024-5223-CE. The property is located at 23717 West Victory Boulevard. It's in Council District Number 12.

At this time we will hear from Planning staff, Henry Chu.

MR. CHU: Yes, good evening. Henry Chu, Associate Zoning Administrator with the Department of City Planning. So I'm going to try to be quick with my presentation.

What's before you is an appeal of the Zoning Administrator (indiscernible) of a request to add a drive-through of a residentially zoned property to EPA from the Commercial Performance Standards and for a zone boundary adjustment.

I wanted to start off with this slide to show a map that can view the project and show the steps in the entitlement process for where we are today.

So we had a public hearing on September 6 of 2025. The Zoning Administrator issued a determination letter on October 21, 2025. The decision was appealed by

1 the appellant, Jamie Hall, representative for West Valley
2 Alliance for Optimal Living, and then we're here today with
3 some (indiscernible).

4 So the site is located near the northeast corner
5 of Platt Avenue and Victory Boulevard. Site has dual
6 zones. Sheet C1-1BL and BE1 -- E1PL (phonetic) for a total
7 of 23,478 square feet. It's currently developed with a
8 vacant building, formerly a Pizza Hut restaurant. There
9 are two cell towers with associated equipment, non-
10 confirming trash enclosure and state transformer and at a
11 pole sign (phonetic). There is a reciprocal easement that
12 allows access between the subject property and the property
13 to the north, which is the development of a McDonald's
14 drive-through. There is a utility that runs along the
15 westerly five feet of the west property line. The site is
16 surrounded by a commercial use that develops
17 (indiscernible) and across the Platt (phonetic) to the
18 north.

19 Immediately to the east is a neighborhood
20 asserting shopping centers that include a sit-down coffee
21 shop and across Platt Avenue is a shopping center.
22 Residential and commercial uses are located to the south of
23 West Victory Boulevard. Residential uses are located to
24 the west. It should be noted that there is an existing
25 easement mentioned earlier that allows access to

1 (indiscernible) north property.

2 Briefly, the project development (indiscernible)
3 vacant 2,135 square foot restaurant building to demolish
4 all large (indiscernible) buildings, non-conforming trash
5 enclosure, transformer, road separate LTEWP application and
6 both separately permitted cell towers. The project will
7 retain their existing pole signs located along Victory
8 Boulevard. The project will construct a new 1479 square
9 foot walk-through coffee shops, walk -- pick-up/walk --
10 walk in, drive -- a walk-up/drive-through coffee shop
11 building with 16 parking spaces and constructed new trash
12 enclosure. The project was granted conditional uses to
13 permit the drive-through since it is abutting a residential
14 zone and deviations from the commercial quarter standards.

15 In addition, a zone boundary adjustment was also
16 granted in exchange for P-1 and C-1 portions of the lot
17 accommodating the proposed drive-through. Other parts of
18 the project involve a replacement of an existing five to
19 five-and-a-half-foot tall wall on the western portion of
20 the site for a new six-foot-tall wall at the edge of the
21 portion of dedication to the corner where it meets the
22 existing wall, which is approximately 135 feet.

23 The new pavement as right-of-way designed to be
24 88 standard will be constructed. Short and long-term
25 biking. Bike parking will be provided, EV parking stalls

1 and a lead transformer which require the LATW stage barrier
2 will also be constructed. In addition, there will be new
3 landscaping with lighting and irrigation.

4 So we had the public hearing on September 6, 2025
5 and prior to the hearing public correspondence was received
6 from the West Hills Neighborhood Council. During the
7 public hearing four people spoke and provided testimony.
8 Issues raised included impacts to residential neighbors,
9 late hours, noise, traffic and circulation returns as the
10 presence of other coffee shops near the site. Those
11 comments can be found at page (indiscernible) 15 of the
12 determination letter and after the public hearing members
13 of the community submitted letters. Those can be found at
14 page 11 of the determination letter.

15 In addition, in October of 2025 staff reached out
16 to the Department of Transportation of the West Valley
17 District to have them complete the project, even though
18 they're not needing professionals to trigger a project
19 review, their comments and concerns were considered.

20 So as far as the zoning, it's the Administrator's
21 position appropriate findings are required. If requests
22 are granted, then all findings must be made in the
23 affirmative. This slide summarizes the required findings
24 for all conditional uses found on the left column and those
25 additional ones required for drive-through requests and

1 those required to deviate from the commercial performance
2 standards.

3 Also granted as the zone boundary readjustment
4 and this is required by the applicant to allow drive-
5 through lanes that propose trash enclosures and to
6 accommodate for the reinstallation of the wireless power
7 transformation and require transformers and required
8 landing space.

9 To the right side is the site layout showing the
10 drive-through lane and to the left is the one required
11 finding that must be made for a zone boundary adjustment.
12 It should be noted that the reciprocal easement limits the
13 project's ability to make adjustments to the proposed drive
14 aisle.

15 So on November 5, 2025 an appeal was filed by
16 Jamie Hall, Channel Law Group, LLP, for the West Valley
17 Alliance for Optimal Living. To summarize, the appeal
18 involved the following points: inappropriate environmental
19 clearance and possible and (indiscernible) by was not
20 appropriate under unusual circumstance with probability of
21 significant effect. They also stated that findings number
22 2 and number 4 are not adequately supported.

23 Prior to today's meeting official studies from
24 their consultants for the appellant were submitted. This
25 includes an air quality study by EAS dated February 3rd

1 that was recently submitted and then noise assessment study
2 by Steve Rogers Acoustics, which was also submitted.

3 So conditional uses are discretionary actually
4 that can be accrued if appropriate conditions can be placed
5 and the -- required findings made, so even the
6 Administrator who posted conditions, et cetera, concerns of
7 noise, traffic and operation characteristics of the subject
8 that (indiscernible) restaurant.

9 In addition, hours were limited to respect to any
10 residential uses. Several conditions were imposed to
11 address any potential for noise, litter and other uses.
12 While the project is anticipated to have 398 daily trips,
13 it does not trigger a traffic review since it does not
14 exceed the 500 daily-trip threshold.

15 However, staff contacted DOT, Department of
16 Transportation, to review the project. They expressed
17 concerns of potential blockage of vehicles of cars
18 existing -- exiting the drive-through aisle and having a
19 right turn in and right turn out on Victory Boulevard.

20 The Zoning Administrator added condition over 20
21 (indiscernible) to have an employee come outside to
22 facilitate the flow when vehicles exceed that 13-car
23 capacity. In addition, condition number 27 was included to
24 work with DOT to have that right-turn exit installed.

25 The appellant states the design of the project

1 places the drive-through -- the appellant states in their
2 appeal that the project places the drive-through along the
3 western portion of the property. This needs to be
4 corrected. The drive-through is actually on the eastern
5 portion of the property. There is a separation of 53 feet
6 from the closest point of the building through the alley
7 and then 20 feet width for the alley, so a total of 73 feet
8 is that separation of gap.

9 With regard to the submitted reports by the
10 professional consultants, the City and others relied on
11 professionals to take appropriate action and make the right
12 decisions. These reports were not available at the time of
13 the determination letter. However, I can respond to the
14 start-up construction of the building by stating that the
15 construction is temporary and will be subject to City
16 standards of best practices to minimize dust, noise and
17 idling of machinery.

18 Some of these conditions have been imposed in
19 other projects that have drive-throughs abutting the
20 residential property and have been compatible with
21 surrounding uses. You can also turn to the applicants to
22 see if they have responses to the submitted reports and
23 request that they submit any noise and air quality reports
24 into the record.

25 As far as the environmental clearance the project

1 will need the Commission to determine that the project also
2 requires a Class 3 categorical exception pursuant to
3 Section 1530 (phonetic) CEQA. Since a portion of the
4 project will demolish and construct a new building and
5 associated drive-through lanes, the Class 3 addresses the
6 municipal law construction and with the stack of the Class
7 1 and Class 5 categorial refreshing which addresses the
8 revitalization of existing (indiscernible). The Commission
9 will also determine that none of the exceptions apply.

10 With regard to the unusual circumstances and
11 significant effect per CEQA 15300.2C, the City has been --
12 the City has seen several requests for drive-through
13 operations where there are residential uses next to the
14 subject drive-through property. There is nothing unique or
15 unusual about this site and this drive-through request is
16 quite common all around the city. Examples of such
17 approvals and operations can be provided. Staff can list
18 them at the request of the Commission.

19 It was brought to the attention also that the
20 Zoning Administrator recently submit -- it was brought to
21 the attention of the Zoning Administrator that the
22 applicant recently submitted a list of conditions that they
23 wished to add and we'll allow the applicant to present
24 those to the Commission.

25 Staff recommends the project is categorically

1 exempt under CEQA, Class 1, Class 3 and Class 5 and that
2 the appeal will be denied and the decision of the Zoning
3 Administrator is sustained. In the event the Commission
4 wishes to consider other conditions, staff (inaudible) and
5 staff is available for any (inaudible).

6 PRESIDENT BARRAZA: Thank you very much for the
7 appellant presentation.

8 First, we'll hear from the appellant. Please
9 approach the podium and state your name for the record.
10 Speak directly into the microphone. Mr. Hall, will ten
11 minutes be enough for you?

12 MR. HALL: That's exactly what I was going to
13 ask.

14 PRESIDENT BARRAZA: All right.

15 MR. HALL: Thank you.

16 PRESIDENT BARRAZA: So please. The floor is
17 yours.

18 MR. HALL: Let me just test run this for a
19 second.

20 PRESIDENT BARRAZA: That's fine.

21 MR. HALL: The test here over (indiscernible).
22 All right.

23 Good evening. My name is Jamie Hall and I'm a
24 land use and environmental attorney with Channel Law Group.
25 I'm here today representing appellant West Valley Alliance

1 for Optimal Living.

2 As you know by now, my client has appealed the
3 Zoning Administrator's approval of a conditional use permit
4 and related entitlements for our proposed Starbucks drive-
5 through. First, I'd like to provide a little information
6 about my client. West Valley Alliance for Optimal Living
7 is a non-profit association that advocates for the
8 protection of the environment and the quality of life for
9 residents who live and work in the West Valley. My client
10 is concerned about the noise, fumes and traffic hazards
11 associated with this project, which will operate for over
12 18 hours a day if approved.

13 Going over a little bit of the procedural
14 background, which the Zoning Administrator already did a
15 little bit, the Zoning Administrator conducted a hearing on
16 September 6, 2025 in which testimony was received about the
17 adverse impacts of the project. Thereafter, on October 21,
18 2025 the ZA approved the project and issued a letter of
19 determination.

20 My client then timely appealed an appeal on
21 November 5, 2025. Significantly, on February 2, 2026 my
22 client timely submitted supplemental appeal justification
23 materials accompanied by two technical expert reports
24 regarding noise and air quality, evidence which
25 fundamentally alters the evidentiary landscape of this

1 case.

2 Now let's look at this slide. This is an
3 intersection that's already saturated with drive-through
4 uses, including a McDonald's immediately to the north.
5 Crucially, there is already an existing Starbucks directly
6 across the street and a Coffee Bean next door. The project
7 does not fill any community need. It's intensifying the
8 use that creates redundancy and hazard.

9 The project proposes to demolish a vacant Pizza
10 Hut and then build a drive-through Starbucks. Here you can
11 see an aerial photo overlaid with the site plan for the new
12 Starbucks drive-through. You can also see in this aerial
13 photo the McDonald's drive-through that's located next
14 door. The existing side constraints forced the 13-car
15 Starbucks drive-through queue to be placed near the western
16 property line and adjacent to an RS-1 low residential zone.
17 The only separation besides a small parking lot is a 20-
18 foot alley. The design essentially creates a canyon of
19 noise and exhaust fumes directly -- directed specifically
20 at the residential neighbors to the west.

21 To -- now, to approve this, the ZA had to make
22 specific findings for the CUP and discretionary
23 entitlements. My client asserts the ZA erred in making
24 these findings because they're not supported by substantial
25 evidence or the law. So conditional use -- here you see

1 the three required findings for the conditional use permit.
2 I would note that these are focused on things such as
3 compatibility with the neighborhood, conformity with
4 existing zoning and community plans adopted by the City and
5 enhancement of the build environment. And here, you see
6 the three required findings for the drive-through. I would
7 note these are related to be undesirable impacts that could
8 be caused by a drive-through, for example, noise, light,
9 trash, et cetera. And here you can see the two required
10 mini-shopping centers/commercial corridor findings. I
11 would note these focused -- are focused on things such as
12 hazards, traffic congestion and reducing the concentration
13 of many shopping centers or commercial corner developments.
14 And here you see the requirement zone boundary adjustment
15 finding.

16 Now let's take a look at the justifications for
17 appeal. My client's appeal rests on basically three
18 pillars: (1) the compatibility error; the ZA fundamentally
19 ignored the operational intensity of the project; and (2)
20 the traffic error; the ZA found no hazard while
21 simultaneously mitigating corridor hazards; and (3) the
22 CEQA error. The project is simply ineligible for a
23 categorical exemption from CEQA.

24 Let's drill down on compatibility, which is one
25 of the required findings for a CEP. The ZA found the

1 project would be compatible and not adversely affect the
2 neighborhood. This is factually incorrect. Operating from
3 4:30 a.m. to 11:00 p.m. next to single-family homes is
4 inherently incompatible. The applicant's recent offer to
5 install a no-honking sign does not mitigate the
6 incompatibility of an industrial-scale queuing operation.
7 The ZA focused on the speaker box noise, but the speaker
8 box is not the primary source of the noise. As illustrated
9 here and supported by Steve Rogers Acoustics report that my
10 client commissioned, the noise sources are vehicle engines,
11 door slams and remote clicking chirps. These occur along
12 the -- near the western property line. The block wall does
13 not block these sounds from reaching adjacent holes,
14 according to the acoustical engineer. The applicant's
15 response regarding automatic volume control on a speaker is
16 irrelevant to the noise generated by the cars themselves.

17 Now let's move on to the mini-shopping
18 center/commercial corridor conditions, specifically the
19 condition regarding traffic. The ZA stated the project did
20 not meet the threshold for a traffic assessment. However,
21 City data shows the use generates 789 daily trips. That is
22 nearly 600 more trips than the previous use. The ZA
23 claimed that there was no traffic hazard, yet at the same
24 time the ZA mandated a right-turn only condition and also
25 requires Starbucks employees to facilitate traffic

1 movements as a condition of approval.

2 Respectfully, you cannot find that a project
3 creates no traffic hazard and simultaneously required an
4 employee to stand in the driveway to prevent gridlock.
5 That condition acts as an admission that the site design
6 cannot contain the traffic demand.

7 Now let's move on to the CEQA error. Originally,
8 and this is in the letter of determination, the City used
9 two categorical exemptions: the Class 1 categorical
10 exemption, which is for existing facilities; and a Class 5
11 categorical exemption, which is for minor alterations.
12 However, both of these exemptions fail as a matter of law.
13 Demolishing a building to construct an entirely new drive-
14 through facility with different operational characteristics
15 is not a minor alteration or negligible expansion of use.

16 Let's take a closer look at the Class 1
17 categorical exemption. It's reserved for what's called
18 existing facilities and the CEQA guidelines clearly state
19 that the "key consideration is whether the project involves
20 negligible or no expansion of use." The project just
21 doesn't fit within the exemption as a matter of law. The
22 Pizza Hut did not have a drive-through and the new project
23 is adding one. This is an expansion of use, which means
24 the City cannot use the Class 1 categorical exemption.

25 Now let's look at the Class 5 categorical

1 exemption. It's for "minor alterations and land use
2 limitations," which do not result in any changes in land
3 use. It is for truly minor changes. It simply does not
4 apply in this case.

5 The proposed project involved demolition of the
6 existing building and constructing a new high intensity use
7 that will operate -- again, I said it several times -- from
8 4:30 a.m. to 11:00 p.m. Even if the project fell within
9 these exemptions, which they don't, it would still not be
10 subject to a categorical exemption due to unusual
11 circumstances. That carves out exemptions for projects
12 that will have a significant effect on the environment due
13 to unusual circumstances. And I'll pause here and say that
14 for the first time we're hearing that the City has now
15 asserted a Class 3 categorical exemption. That's not in
16 the letter of determination. That's something that
17 obviously the City saw a little weakness here and decided
18 to pull that out and see if that works. But still, the
19 unusual circumstances would preclude that from being used
20 as well. The unusual circumstances exemption applied here.
21 The proximity to the RS-1 zone and the 18-hour operation
22 cycle constitutes unusual circumstances that create a
23 reasonable possibility of significant effects on the
24 environment.

25 Further, expert reports commissioned by my client

1 document the significant effects. The Steve Rogers
2 Acoustics report confirms that ZA's reliance on the alley
3 and a block wall is speculative and unsupported by
4 technical data. Furthermore, the air quality report by
5 environmental permitting specialists found that NO2
6 emissions from the idling cube will exceed federal air
7 quality standards. Residents 60 feet away will be
8 breathing exhaust fumes 18 hours a day. The applicant's
9 response yesterday claimed that these assumptions were
10 unrealistic, but provided no technical study of their own
11 to refute it.

12 On that topic and my client received the
13 applicant's response late yesterday. They're now offering
14 new conditions, painted arrows, speed bumps, a no-honking
15 sign and raising the wall from six feet to eight feet.
16 However, as detailed in our rebuttal reports up to today
17 these measures are insufficient to cure findings.

18 First, an eight-foot wall does not solve the
19 noise and compatibility. My client's noise expert,
20 Mr. Rogers, determined that effective mitigation would
21 require a 50 to 100-foot continuous band of dense trees, a
22 buffer to sight physically cannot accommodate. Raising a
23 wall two feet does not stop noise from traveling over it to
24 the second story bedroom window.

25 Second, the applicant's offer to replace a

1 parking spot with a landscape island is explicitly
2 conditional on whether it's permitted by the utility
3 easement.

4 And finally, painting arrows and placing a no-
5 talking sign ignores the reality of human behavior. A sign
6 does not stop the noise of engines idling, door slamming or
7 the toxic exhaust accumulating 60 feet from a resident's
8 home.

9 In conclusion, my client respectfully requests
10 that the appeal be granted. There's an accumulation of
11 drive-throughs on these two lots that cannot be ignored and
12 there's many coffee spots in the close proximity. The
13 required findings cannot be made. Thank you for your time.

14 PRESIDENT BARRAZA: Perfect timing.

15 We'll now move on to the applicant's
16 presentation. We will now hear from the applicant. Please
17 approach the podium, state your name for the record and
18 speak directly into the microphone. You will also have ten
19 minutes to address the Commission.

20 MS. FLORIE: Good evening. My name is Jennifer
21 Florie (phonetic) from (indiscernible). I'm here on behalf
22 of Starbucks. Appreciate your time. I know it's been a
23 very long evening, so I'll try to make this brief as
24 possible here.

25 This project here (indiscernible) involves a new

1 coffee shop. All right. Our project was approved by the
2 Zoning Administrator October 21st and was appealed by
3 Mr. Borenstein (phonetic) of the West Valley Alliance for
4 Optimal Living. This firm is representing -- has
5 been appeared in front of you many times, so he is -- he is
6 a well seasoned person about coming in in front of you.
7 But today I'm asking you just to reject his appeal and ask
8 you to approve the case as approved by the Zoning
9 Administrator, and we've even offered additional
10 concessions that we're willing to put on record and adopt
11 in order to address some of the concerns that were brought
12 up that we discussed the issues with the appellant
13 themselves.

14 So looking at the existing set here, as we had
15 talked about, this is an existing Pizza Hut. It's been
16 naked for many years and the structure is in a really rough
17 shape. If you look in front you'll see there's pictures of
18 the existing building exterior, which were provided by the
19 West Hills counsel. There's been dumping. There's been
20 vandalism and there's graffiti to the building.

21 Even last week the building was broken into and
22 you can see in this picture here the window has been
23 broken. We've had evidence of people camping inside the
24 building and doing graffiti within -- inside the building.
25 It's been a vagrants problems. The property owner has been

1 out there in response to the issue but it is a continual
2 issue there.

3 So looking to the site plan here, this is a
4 landscape plan so you can see the site plan with landscape
5 together here. You'll notice that we're a small site.
6 We're on half an acre and we are looking at designing the
7 property to kind of mimic the existing development pattern.
8 So on the left side you'll see that we're proposing to keep
9 existing parking areas that are there that's been there for
10 many years. Nothing new. We're not proposing any changes
11 other than to add landscaping along the street side and to
12 the very back of the building. You'll see that our
13 building is half the size of the existing Pizza Hut
14 building. And in the area for us in a drive-through, we'll
15 be taking out the existing 13 parking stalls, the cell
16 towers, and instead we'll be replacing that 13 spaces with
17 a new drive-through that can accommodate up to 13 stalls.

18 So (indiscernible), our drive-through is entirely
19 separate from our drive aisle and our drive-through is on
20 the far east side of the property here. In the appellant's
21 original justification in its supplemental brief and then
22 even in -- I believe it was the noise report, they're
23 talking about having a drive-through on the west side and
24 the assumptions were that we're installing immediately
25 adjacent to the residential area. That is not true. All

1 we are doing is we're taking those existing 13 parking
2 spaces on the right side of the building, we're redesigning
3 that so that is going to be a new drive-through.

4 Then we're adding entire landscaping, so you'll
5 see we've added a bunch of trees here, landscaping. None
6 of that exists currently in the block.

7 You'll also see on plan number 7, which is on the
8 far right side of the building, about three-quarters of the
9 way up, (indiscernible) car seven, that's where we're going
10 to have the speaker box. Speaker box features the type of
11 technology called the automatic volume control and what
12 that does is it ensures that the volume does not ever
13 exceed 15 decibels greater than the ambient conditions.
14 But more importantly, what it does is it also ensures that
15 within 20 feet you're back to the ambient conditions. So
16 in other words, we're -- through the speaker box in the
17 front is about 100 feet (phonetic) here, it won't be louder
18 than the ambient conditions of that property line, even 20
19 feet away.

20 Going to the next slide here, these are the
21 (indiscernible) that we have here. This is not what was on
22 the zoning application. This is instead a zoning boundary
23 adjustment. We are asking for Class 2 CUP that would allow
24 for that drive-through. And then there was a couple minor
25 deviations. And we're not really going to talk about the

1 ground floor transparency that's part of the appeal. They
2 do want to talk about we asked for a five-foot required
3 landscape set back on the west property line. That's
4 because there's an existing sewer line easement for
5 McDonald's that runs along that area. There is some
6 discussion today -- filing that they made today that they
7 don't have -- didn't -- we didn't provide a copy of that
8 easement document. Supplemental that you received today
9 will be that document so you can see that easement.

10 And then we are asking for a deviation allowing
11 for expanded hours of operation from 11:00 p.m. set to 7:00
12 a.m. You'll notice in their briefs they talk quite a bit
13 about the evening hours of operation. The funny thing is
14 the ZA actually imposed a condition so they reduced the
15 hours of operation in the evening times from what we'd
16 normally be allowed to do.

17 So in an attempt to go and resolve their
18 concerns, we had a meeting with them a couple weeks ago.
19 And frankly, what we wanted to know is, what are your
20 problems with the project and what can we do to resolve
21 them. And I'm going to walk through each one of the
22 concerns that they talked about and go and address how we
23 were able to resolve it.

24 So, for example, remember we're part of the
25 existing McDonald's drive-through. Our design is very

1 different. We do not have a drive-through that runs
2 through our regular parking area because it's entirely
3 separated. Okay.

4 So you'll see on-site movements. We've -- yeah,
5 that process (indiscernible) going and leaving our driveway
6 completely outside of that area there. So we looked at
7 other drive-throughs at this corner and said, how are they
8 addressing their drive-throughs. Looking at the McDonald's
9 again, their drive-through runs through the center parking
10 area and they don't have the separated drive-through other
11 than line of order point. But the Carl's Jr. across the
12 street, there's the same issue. Theirs queues five cars
13 and take you out into the driveway aisles.

14 Taco Bell, which is also at this intersection
15 here, they're a little bit south of the intersection, same
16 thing. They don't have a separated drive-through or
17 queuing area. It runs through their drive aisle areas.
18 They're concerned about having our drive-through run
19 through our site.

20 What we're saying is our drive-through queuing is
21 for 13 cars and it uses an entirely separate drive aisle.
22 So we're very different than the other type of drive-
23 through uses in the area.

24 Going in -- one of the other things they
25 mentioned when we met with them, they were talking about

1 the on-site speed. They're worried about having cars drive
2 through that at a fast level and they asked if we could put
3 speed bumps in. We said, sure. You want speed bumps,
4 we're fine with it. (Indiscernible) the stipulation.

5 They often talked about going and -- sorry,
6 totally didn't see this part here. They talk about the
7 drive-through speaker area and they were worried about
8 vehicle noise. We clarified, number one, that the drive-
9 through is not on the west side; it's on the east side.
10 There is an existing shore wall. We said we'll raise it to
11 six foot and then actually we had said we're willing to
12 increase it up to eight foot, so you see that in the
13 stipulations. We will do an eight-foot wall. You're
14 worried about the wall height, you're worried about the
15 noise, we'll address that and concede that.

16 Yeah, they were talking about loitering and were
17 worried about kids being in the area and loitering at
18 nighttime. Guess what? There are a lot of loitering right
19 now, so Starbucks maintains a good site and we're willing
20 to go and take care of the property.

21 So here's the big thing. They talked extensively
22 in their report about the noise studies, about noise and
23 traffic. This track traffic studies that we have right
24 here, we -- not track studies. I'm sorry. Track letter
25 and you can see our volume essentially is we're having one

1 car come in and out every two minutes. It's a pretty low
2 volume use here. We are not replacing the existing
3 Starbucks. This is just going to be a drive-through only
4 and there's no lobby. So anything, these are really
5 conservative numbers because there's not a lobby here.

6 Going and looking at the right-turn lane there's
7 already a double yellow line. They asked us to go and
8 stripe and say, no left-hand turn lane. Okay. We'll
9 stipulate to it. We'll put a sign up there. It's already
10 been included.

11 The staging area, they're asking about the stage.
12 Just wanted to clarify. There's no stage here.
13 Landscaping, again, a lot of trees will be added and we've
14 even added an additional landscape island. They requested
15 they want more trees. That's what they said. On site can
16 you add more trees. Yes, we can. So we're adding trees by
17 the speaker box and the west property line.

18 Trash enclosure, we're going to make it compliant
19 and we're going to have delivery hours and our trash pickup
20 hours will be during the City-required hours, so they won't
21 be overnight trash -- won't be overnight trash pickups. It
22 will happen in accordance with the ordinance.

23 Honking. They said, can you go and not -- make
24 sure people don't honk? Can you put a honking sign up?
25 I'm like, okay, we'll put a no-honking sign at your

1 request. That's why the stipulation is there. Not because
2 we're proposing something cheesy. It's because they
3 requested that in our conversations.

4 Lighting conditions. This one did come up and
5 again I want to point out that we're not having lights be
6 over. We've done a photometric study that demonstrates
7 that.

8 Our hours of operation, we are less than the
9 ordinance required -- requirements for the evening hour,
10 10:00, not 11:00. If you look at the McDonald's we are
11 less time than the (indiscernible) McDonald's who are
12 allowed to be open till midnight and 1:00 a.m., 4:30 in the
13 morning.

14 PRESIDENT BARRAZA: Thank you very much. And
15 with that, we'll now go over to public testimony. We'll
16 open it up for this side. Although we don't have any
17 (indiscernible) for in-person classification.

18 MS. SANDOVAL: Helen Sandoval (phonetic) for the
19 record, we do not have (indiscernible).

20 PRESIDENT BARRAZA: Thank you very much.

21 We go to (indiscernible). If you are
22 participating remotely and would like to give public
23 comment for this case, please raise your hand. If you
24 participate by phone, please press *9.

25 Nathan, do we have any raised hands for Zoom

1 participation?

2 MR. WALL: Nathan Wall (phonetic) for the record.
3 We have one hand raised.

4 PRESIDENT BARRAZA: Please proceed to call our
5 speakers.

6 MR. WALL: Will Zoom attendee Jeff Hornstein
7 (phonetic) please press *6 to unmute yourself and make your
8 comment.

9 MR. HORNSTEIN: Yes, hello. My name is Jeff
10 Hornstein and I'm with the West Valley Alliance for Optimal
11 Living. I've lived in the west San Fernando Valley 64
12 years. I care about this place. I'm not a con man. I
13 care about my neighbors. Thank you very much. And one
14 more thing -- one more thing.

15 The McDonald's is so much further away from
16 residences than the Starbucks and the fact that this
17 doesn't have a traffic study is kind of crazy. I
18 appreciate your time. I appreciate everybody's input, but
19 you've got to go on the corner of Platt and Victory and
20 watch the cars line up as they go to Hail Junior High, El
21 Camino Junior High in a very compacted time frame. You
22 don't understand. We do need a traffic study for this.
23 Thank you very much.

24 PRESIDENT BARRAZA: Do we have any other raised
25 hands?

1 MR. HALL: Nathan -- Nathan Hall for the record.
2 No, we do not.

3 PRESIDENT BARRAZA: Thank you very much. Do we
4 have any certified neighborhood counsel representatives or
5 Council member representatives that would like to speak?

6 MS. SANDOVAL: Helen Sandoval for the record, we
7 do not have any certified neighborhood counsel
8 representatives or Council members at this time.

9 PRESIDENT BARRAZA: Okay. From now we'll go to
10 the rebuttal. We'll now hear back from the appellant.
11 Please approach the podium and state your name clearly and
12 proceed with your rebuttal.

13 Mr. Hall, do you need more than five minutes?

14 MR. HALL: Yes, I do.

15 PRESIDENT BARRAZA: Okay.

16 MR. HALL: Good evening again, Jamie Hall with
17 Channel Law Group on behalf of appellant, West Valley
18 Alliance for Optimal Living.

19 I'd just start off with, yes, my client and I did
20 meet with the applicant's representative and we discussed
21 some items and then we heard nothing. Literally nothing.
22 And the first time I ever heard of these additional
23 conditions of approval was in a letter that was submitted
24 by the applicant, which we got for the first time
25 yesterday. So, you know, a dialogue was opened, discussed

1 these issues with the applicant's team, and then we never
2 heard back, so that's why we proceeded to diligently pursue
3 this appeal.

4 We stand ready to continue to sit with the
5 applicant's team and discuss some of these items. My
6 client still has concerns with some of the suggestions that
7 didn't fully meet expectations. Some of their items that
8 were suggested and talked about were not included here.
9 But, you know, I just want you to know that we met with
10 them. They asked for a meeting. We had a meeting. I
11 thought it was productive. Never heard anything at all, so
12 that's why we're here.

13 And respectfully, the experts clearly did
14 understand the site plan and where the drive-through was
15 oriented. Yes, we understand. The drive-through is not
16 literally -- the queuing area is not literally right next
17 to that block wall. There's a parking. You know,
18 obviously there's like the original parking and then
19 there's the site plan. That doesn't change the analysis.
20 The experts took that into consideration when they reached
21 their conclusions and the conclusions that they reached
22 were that there would be with regard to air quality that
23 their -- they would exceed federal standards.

24 Not everyone has an AV. Some people are still
25 using traditional cars and those cars while they're waiting

1 to get their Starbucks, they're operating and that was not
2 something that the City considered. It's not something
3 that was evaluated by the Zoning Administrator and it's
4 clearly something that is a by-product of a drive-through
5 and that's why this whole process exists. That's why
6 there's a special processor drive-through findings. So
7 that's one of the things that the City has to consider.

8 And now that we've brought that issue to you, the
9 applicant has to respond and it can't just be, nuh-uh. You
10 have to respond with some technical evidence and you don't
11 have that. All you have is evidence from someone who was
12 qualified -- whose rendered opinion that there will be this
13 significant air quality impact and the same thing with
14 regard to noise.

15 So I -- and I just want to emphasize here that
16 this is not just a stand-alone Starbuck -- drive-through
17 Starbucks. There's this McDonald's there and they're both
18 using that same driveway, and so it's like the interference
19 of these two very high usage drive-throughs and how they're
20 interacting with each other that is causing the concern
21 here.

22 So it -- you know, the applicant wants to sit
23 down with us and continue this conversation, we would be
24 happy to continue this hearing so that we could do so, but
25 I was just surprised that we didn't hear back.

1 PRESIDENT BARRAZA: All right. And at this point
2 we'll now hear from the applicant. If you could please
3 approach the podium, state your name clearly, then proceed
4 with your rebuttal. You will also have five minutes to
5 address the Commission.

6 MS. FLORIE: Absolutely. My name is Jennifer
7 Florie. Thank you for the opportunity to respond.

8 We met with them. At the end of the day we can
9 go, we can argue what we agree or disagree about all the
10 findings and I can go through these and I will. But at the
11 end of the day, we want a solution and we said, what can we
12 do to resolve these concerns. It was a big conversation.
13 When we asked for like, what do we need to do in order to
14 get your support, his answer was, well, I can't make a
15 decision. I've got to go back to (indiscernible) so I
16 can't give you a decision, so we knew we weren't going to
17 be able to have the decision before the hearing today.

18 But you know what? Wasn't wanting to go wait
19 around until that happened, so we actively said, okay,
20 here's all of the issues you brought up, here's how we're
21 going to address it and we'll concede -- we'll give you
22 concessions, we'll do that.

23 But I want to talk about these two reports that
24 he's talking about we just got a couple days ago. They're
25 not new -- they're not old and they haven't been around a

1 lot. They just pop them in there. For example, that noise
2 study isn't really a noise study. It's just a letter
3 saying, I disagree with -- I disagree with what I've seen
4 in the report here. Like I just said, had really poor
5 findings on it. The assumptions were wrong. It is
6 assuming that we're right next to the project there.

7 Talking about the air quality report, well, the
8 first air quality report that came back like we received a
9 couple days ago the assumption was that we were going to
10 have 12 cars running continuously for 18-and-a-half hours a
11 day, 365 days a year. That's a lot. That is an
12 unrealistic assumption. So I guess if you're going to have
13 unrealistic assumptions, you're going to have an
14 unrealistic result here.

15 So I'm saying, you've got to go and look at what
16 they're saying and that's not a fair way to say that the
17 noise that we have and air quality study, we have a air
18 quality problem.

19 Construction. Absolutely. We have to comply
20 with construction requirements. It's not like we're going
21 to have any other issues that we wouldn't have in a typical
22 construction case. So we are willing and we are -- and we
23 are -- know we have to comply with all the City, all the
24 County, and all the State requirements here. That is
25 nothing different than what we would do for any other

1 commercial-type development.

2 I am challenging you here to essentially say,
3 look at the existing development. This is an established
4 commercial use and if he's saying essentially if their
5 assertion essentially is because you're a CEP and you're
6 asking for some minor deviations therefore you need to go
7 out and do your full technical studies, wow, that's kind of
8 a dangerous precedent and that is definitely not grounds
9 for any type of appeal here.

10 I am asking you to essentially look at what we
11 have here, recognize that this is a small 1400 square foot
12 existing commercial development and we are putting in a
13 drive-through here. We are not getting rid of the
14 Starbucks across the street. This is something to go and
15 supplement that. They're going to work together here.

16 We have well designed -- we have designed this
17 site very well such that there's more landscaping than
18 there is now. This is a much better improvement than what
19 is existing to the neighborhood right now. I mean, they've
20 got a building that's a maintenance problem. It doesn't
21 have -- virtually has very little landscaping. It is not
22 attractive. It's not a possession-type use. We're saying
23 we want to go and replace it with something that is
24 attractive and an amenity to this community.

25 In regards to saying there's too many coffee

1 shops in the area, I'll tell you what. There's fast food
2 restaurants (indiscernible) multiple retail businesses.
3 Like businesses tend to go and locate next to each other
4 and that's smart planning as you want to have those uses
5 together and to use the existing driveways to share it.

6 You don't want to have everybody having their own
7 little driveway and not have it inter-connected. This is
8 laid out pretty well. We're taking existing conditions
9 that we have here and we're actually going and making it
10 even better for the community.

11 You know, the room is empty. No one is here
12 except for the appellant who doesn't even live in close
13 proximity. He lives in the community, yes, but he's not
14 within the 300 to 500 feet of our property here. That says
15 something here. And we want to build an attractive
16 building that's going to be an amenity for the community.
17 We have a realistic project. We listened to the applicant
18 and I listed all of his concerns. I mean, I've never done
19 a no-honking sign before, but they asked for it so I put it
20 in the conditions of approval. I think that's being really
21 reasonable on our part.

22 In regards to the CEQA requirements, I agree with
23 staff. We need those requirements there. Just because you
24 have a (indiscernible) community, just because you have
25 (indiscernible) does not mean you can't go -- that we can't

1 file (indiscernible), so we're not compliant and don't have
2 to do the technical studies.

3 I'm here to answer any more questions that you
4 have. Again, we're offering these conditions of approval.
5 I've outlined it in the presentation, but I'll put them up
6 here for your consideration.

7 PRESIDENT BARRAZA: Thank you very much. We'll
8 bring it back if we need to see it. Thank you. There you
9 go.

10 With Planning staff, I'd like to --
11 (indiscernible) with that, the last speaker. That was the
12 last speaker. Public testimony has now closed. Would
13 Planning staff like to address any of the issues raised,
14 provide any clarification?

15 MR. CHU: Yes, this is Henry Chu, Associate
16 Zoning Administrator.

17 So as I mentioned earlier, the project does
18 require a Class 3 categorical exemption. That was
19 inadvertently omitted in the determination letter and that
20 would give it the environmental clearance that's
21 appropriate for this project.

22 With regard to the hours of operation, we
23 considered the able counsel's comments. There were site --
24 multiple site visits and they were concerned about late
25 hours and so this is what -- something that they had

1 recommended and I factored that into my decision.

2 And with regard to the -- as I mentioned earlier,
3 I did reach out to LA DOT and they did have three main
4 concerns. One of them was there's an extra coffee shop
5 right next door to the shop (indiscernible), but the other
6 two was the potential for blockage of vehicles trying to
7 exit the drive-through portion and head into the parking
8 lot. And then so that's why I added that condition to add
9 a staff person to facilitate the flow when it exceeds the
10 13-car queuing and/or during peak hours.

11 In addition to that, LA DOT expressed concerns
12 about the exit onto Victory Boulevard and they wanted a
13 right-turn only. That's why I added that condition where
14 that they would work with LA DOT to have that right-turn
15 only exit onto Victory Boulevard.

16 PRESIDENT BARRAZA: Thank you very much. Now
17 we'll go into deliberation. We'll deliberate and discuss.
18 Commissioners, do you have any questions or comments?

19 Does anyone have any concerns with the project
20 that they want to bring up?

21 COMMISSIONER KARADJIAN: Commissioner Karadjian.
22 So thank you as well that there's no plan for the
23 (indiscernible) left turn out of this driveway onto Victory
24 Boulevard by taking your life in your own hands. So I've
25 never been to the block, so I can't really speak to, first

1 of all, experience, but I've driven by several and they
2 seem to be moving quite well. Traffic moves along.

3 I'm wondering the conditions that with having a
4 staff member out front guiding traffic like In-and-Out
5 Burger does in Universal City, with the technology that we
6 have that's available to us with online ordering, with
7 staff bringing the order out, by having -- I'm just pulling
8 suggestions from different things I've seen in parking lots
9 where you order your coffee online, pull into a parking
10 space number two, staff member brings it out, then you're
11 on your way type of thing. I may be stepping out of bounds
12 and I'm sorry for that, but it is just a suggestion that I
13 was thinking about. But other than that, I really don't
14 have a problem with drive-through Starbucks on Victory
15 Boulevard where there are many driveways where people pull
16 in and out.

17 COMMISSIONER: For me when I was listening to Mr.
18 Hall's presentation, one of the things I thought I heard
19 was that there was a McDonald's and Starbucks shared the
20 same --

21 PRESIDENT BARRAZA: Driveway?

22 COMMISSIONER: Driveway when I looked on the
23 master to reconsider that again, see, that wasn't the case
24 and that was something -- they actually have a very cute
25 little thank-you sign and they have left and right signs to

1 go that way. So the traffic actually looks -- if you were
2 to try to exit through Starbucks, you're actually taking --
3 you're actually taking your -- taking a longer route, which
4 I don't actually see.

5 My question actually would be I appreciated the
6 things you added for the right-turn signal and the
7 best right thing to do. The other things that the
8 applicant decided to add after a two-week conversation or
9 three weeks, whatever it was, they added this in their
10 presentation that they're willing to do these
11 considerations. If we wanted to add those as she
12 recommended and memorialize something like this honking
13 sign, what would be the limitation -- well, what could we
14 do in that matter because she's willing to -- they went the
15 mile, they followed the concerns. If we wanted to add
16 those that we have on record, what could we do?

17 MR. CHU: This is Henry Chu, the Associate Zoning
18 Administrator.

19 So from my experience of cases that add
20 conditions, the Commission can deny or grant the appeal in
21 part and since -- and add the conditions and deny the
22 appeal in part and grant the appeal in part, and then that
23 would allow the Commission to add these conditions and make
24 that modification.

25 COMMISSIONER: Now, before I even go into that

1 level right now, looking at what you already added, which
2 was the right -- only going right, the staff member, your
3 already have the 13 cars queuing in the middle, were the
4 speed bumps part of the determining -- was part of your
5 findings?

6 MR. CHU: This is Henry Chu. That was part of
7 the applicant's discussion with the appellant after the
8 assurance of the determination letter and would have file
9 (indiscernible).

10 COMMISSIONER: So then the wall getting set by
11 two feet, that would be something separate?

12 MR. CHU: Correct. Henry Chu. All these
13 conditions were submitted recently and these have similar
14 to the (indiscernible). This is the first time I've seen
15 it as well.

16 COMMISSIONER: So we have those speed bumps, the
17 wall and the trash enclosures and the sign.

18 COMMISSIONER KARADJIAN: Commissioner Karadjian.
19 And it's a very modern up-to-date look, which enhances the
20 area quite a bit.

21 COMMISSIONER: Yeah.

22 COMMISSIONER KARADJIAN: And again, Commissioner
23 Karadjian.

24 I strongly recommend that there'd be a lot of
25 foliage around the microphone ordering area and really test

1 out the volume of the microphone going back and forth.

2 COMMISSIONER CROCKETT: It's Commissioner
3 Crockett. I guess one question. I think that the Planning
4 Department representative touched on this, which was the
5 hours. I just did a quick search of listed Starbucks in
6 West Hills close by and I think -- so I was just curious if
7 you want to give a consideration to inform with other
8 locations and kind of what was the justification there.
9 Please feel free to comment.

10 MS. FLORIE: This is Jennifer Florie. Starbucks
11 uses a dynamic way of setting their hours. So what the
12 hours are right now may be different several months from
13 now. So they change them quite frequently. The hours of
14 operation that we're proposing here are kind of the maximum
15 hours that we have. We may not actually open those times.
16 We may open later, may close earlier. We could do all of
17 that for there, but those we're asking for the maximum
18 range right now.

19 As far as Starbucks isn't here just really hope
20 for me to go and do an operational question to make that
21 commitment now, but I will say I'm committed that staff is
22 noticing it -- performance issue with us being open till
23 10:00 at night, you know, we are happy to have them
24 (indiscernible) need to adjust (indiscernible).

25 In regards to the stipulations, we -- or the

1 conditions we're proposing here, it doesn't matter to us
2 how you choose to adopt those. If it's an issue of
3 procedure how to do it, I will (indiscernible) word these
4 into record and say that we are willing to do it and do it
5 by agreement if that's a better way to do it or it's easier
6 for you to actually as a true condition. It doesn't matter
7 to us.

8 COMMISSIONER KARADJIAN: Commissioner Karadjian,
9 I think you have to do it because --

10 MS. FLORIE: Okay.

11 COMMISSIONER KARADJIAN: -- it will be right
12 on --

13 MS. FLORIE: Absolutely.

14 COMMISSIONER KARADJIAN: -- if you don't. So I
15 suggest that you comply with the conditions set by staff
16 and yourself to engage the community for a better
17 relationship with them.

18 Commissioner Karadjian. What --

19 PRESIDENT BARRAZA: (Indiscernible). Oh,
20 actually, please.

21 MR. CHU: Yes. Henry Chu, Assistant Zoning
22 Administrator.

23 So condition number 31 is a condition that
24 requires the plan approval in the event that there's
25 (indiscernible) evidence as non-replies to these

1 conditions, so they would have to come back, go through a
2 public hearing to prove that they are in compliance with
3 these conditions and there's evidence and findings are
4 made, then Zoning Administrator can add -- or to leave to
5 quantify any of the conditions, so that includes the
6 reduction of the hours of operation.

7 PRESIDENT BARRAZA: Okay. Thank you.

8 (Indiscernible)

9 COMMISSIONER KARADJIAN: Commissioner Karadjian,
10 I move to -- for item number 6, case number ZA-2024-5222-
11 CU2-ZBA-1A, with ENV-2024-5223-CE I move to deny the appeal
12 and sustain the Zoning Administrator's determination dated
13 October 21, 2025, including the environmental clearance to
14 care for the project and adopt the conditions of approval
15 and findings in the letter of determination of the Zoning
16 Administrator.

17 PRESIDENT BARRAZA: Do we have acceptance by the
18 counsel of the Planning. Does that include quantifying an
19 environmental (indiscernible) assumption?

20 COMMISSIONER KARADJIAN: Yes, what she said.
21 Absolutely.

22 PRESIDENT BARRAZA: The Class 3, right?

23 UNIDENTIFIED VOICE: (Indiscernible) attorney. I
24 also want to clarify just based on the comments that has
25 just been heard. Was it your intent to add the suggested

1 voluntary conditions be added as conditions for approval in
2 terms of the --

3 PRESIDENT BARRAZA: I'm fine with the way it is.

4 UNIDENTIFIED VOICE: About the additional
5 conditions or with -- I didn't --

6 PRESIDENT BARRAZA: No additional conditions
7 before me. I think staff Chu did a great job of explaining
8 out the other and I trust you will follow that.

9 PRESIDENT BARRAZA: With that, do we have a
10 second?

11 COMMISSIONER GOURDIKIAN: Commissioner
12 Gourdikian, I second.

13 PRESIDENT BARRAZA: Will you call -- will you
14 please call for a vote?

15 SECRETARY: Alison (indiscernible) for the
16 record. Commissioner Karadjian?

17 COMMISSIONER KARADJIAN: Yes.

18 SECRETARY: Commissioner Gourdikian?

19 COMMISSIONER GOURDIKIAN: Yes.

20 SECRETARY: Vice President Crockett?

21 VICE PRESIDENT CROCKETT: Yes.

22 SECRETARY: President Barraza?

23 PRESIDENT BARRAZA: Yes.

24 SECRETARY: And the motion is carried.

25 PRESIDENT BARRAZA: And with that, we have no --

1 with (indiscernible) this meeting held, (indiscernible) the
2 time is now 7:33 p.m., thank you.

3 * * * * *

4 I certify that the foregoing is a correct
5 transcript from the electronic sound recording of the
6 proceedings in the above-entitled matter.

7 *Ruth Ann Hager*
8

9 _____ Date: February 20, 2026

10 RUTH ANN HAGER, C.E.T.**D-641
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Channel Law Group, LLP

March 24, 2026

Justification for CEQA Appeal;
23717 West Victory Boulevard; Case Nos.: ZA-2024-5222-CU2-ZBA;
ENV-2024-5223-CE (“Project”)

EXHIBIT F

Rebuttal Letter by Air Quality Expert Ray Kapahi (March 9, 2026)



March 9, 2026

Jamie T. Hall
Channel Law Group, LLP
8383 Wilshire Blvd., Suite 750
Beverly Hills, CA 990211

Subject: Response to February 12, 2026 Comments on Air Quality
Starbucks West Valley Project

Dear Jamie:

I have reviewed the transcript of the South Valley Area Planning Commission hearing on February 12, 2026. I am responding to the comments from Jennifer Florie related to air quality. She asserts that 12 cars running eighteen and a half hours per day for 365 days is unrealistic and therefore the results are unrealistic.

It might be helpful to provide some background information on how project emissions are translated into impacts using dispersion and risk modes. Please see attached figure showing how the emissions from idling cars were used to calculate impacts to air quality and public health in my Technical Memorandum dated February 2, 2026.

Exhaust emissions from idling cars were analyzed in two separate ways.

1. Determine impacts to short-term (1-hour) local air quality, primarily emissions of Nox.
2. Determine impacts to long-term (chronic) public health (cancer and non-cancer health effects)

Part of my analysis focused on NOx emissions from cars and if such emissions would violate applicable state and federal 1-hour standards. These standards appear in Table 1 in my Technical

Memorandum “Ambient Air Quality Standards”. These emissions directly impacts residents in adjacent homes.

As was also noted in Page 2 of my Technical Memorandum the results of the analysis demonstrates that emissions from idling cars would violate the current state and federal 1-hour air quality standards.

In other words, you need only 12 cars idling for 1 hour to trigger a violation of the 1-hour NO₂ ambient air quality standard. You do not need 12 cars idling 18.5 hours per day or 12 cars idling for 18.5 hours per day, 365 days per year.

I think it is reasonable to assume there would be many hours throughout the day when 12 cars would be present over an hour. Indeed, I expect there would be 100s of hours throughout the year when 12 cars are present at the drive-through. Emissions during each of these hours would be sufficient to trigger a violation of the 1-hour state and federal ambient air quality NO₂ standards.

As shown in the attached figure, the assumption of 12 cars idling 18.5 hours per day for 365 days was used to calculate public health risks that were determined to be less than significant on a project level. It is standard practice to use worst case assumptions in determining health risks and are incorporated into the risk assessment guidelines.

Let me know if you require additional information or clarification. I can be reached at ray.kapahi@gmail.com or by phone 916-806-8333.

Sincerely Yours,

Ray Kapahi

Ray Kapahi
Principal
Environmental Permitting Specialists

