DEPARTMENT OF CITY PLANNING

COMMISSION OFFICE
(213) 978-1300

CITY PLANNING COMMISSION

MONIQUE LAWSHE
PRESIDENT

CAROLINE CHOE
VICE-PRESIDENT

PRISCILLA CHAVEZ
MARTINA DIAZ
SARAH JOHNSON
PHYLLIS KLEIN
BRIAN ROSENSTEIN
JACOB SAITMAN
ELIZABETH ZAMORA

CITY OF LOS ANGELES
CALIFORNIA

KAREN BASS
MAYOR

EXECUTIVE OFFICES
200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801
(213) 978-1271

VINCENT P. BERTONI, AICP
DIRECTOR

KEVIN J. KELLER, AICP
EXECUTIVE OFFICER

SHANA M.M. BONSTIN
DEPUTY DIRECTOR

HAYDEE URITA-LOPEZ
DEPUTY DIRECTOR

ARTHI L. VARMA, AICP
DEPUTY DIRECTOR

LISA M. WEBBER, AICP
DEPUTY DIRECTOR

CRAIG R. WEBER
DEPUTY DIRECTOR

October 22, 2026

Los Angeles City Council
c/o Office of the City Clerk
City Hall, Room 395
Los Angeles, California 90012

Attention: PLUM Committee

APPEAL SUMMARY AND STAFF RESPONSE. 4802 – 4828 West San Vicente Boulevard; CF 26-1289-S1

Project Background

At its meeting of July 9, 2026, the City Planning Commission (CPC) voted 8-0 to approve the proposed project (Case No. CPC-2025-5194-HD-CU2-PR-ZC) involving the demolition and removal of an existing one-story warehouse building and surface parking, and the construction, use, and maintenance of a 161,645 square-foot, seven-story self-storage building for household goods on an approximately 30,613 square-foot site. The self-storage building will feature storage units across each floor level, a 954-square-foot ground floor office area, a 608 square-foot lobby, and a 376 square-foot community/multi-purpose room, and would operate between 7:00 a.m. to 10:00 p.m., daily.

The CPC approved the requested Class 2 Conditional Use and Project Review, subject to modified Conditions of Approval, and recommended that the City Council adopt the Zone Change and Height District Change ordinance. The Class 2 Conditional Use is required pursuant to LAMC Section 12.24 W.50 because the Project would locate a storage building for household goods within 500 feet of a residential (R) zone, and the Project Review is required because the Project would create more than 50,000 square feet of non-residential floor area. The CPC also adopted the Mitigation Negative Declaration (MND), Case No. ENV-2025-5195-MND, and the associated Mitigation Monitoring Program (MMP)finding, after consideration of the whole of the administrative record, that with the imposition of mitigation measures there is no substantial evidence that the Project will have a significant effect on the environment, and that the MND reflects the independent judgment and analysis of the City.

Following the issuance of the CPC Determination Letter on August 3, 2026, five (5) appeals from community residents were filed within the 20-day appeal period. The appeals challenge the CPC's approval of the Class 2 Conditional Use and Project Review, the associated Conditions of Approval and findings, and the adoption of the MND. As stated in the Letter of Determination, the CPC's action on the Zone and Height District Change is appealable only by the Applicant, and only if disapproved in whole or in part. Because the CPC's action on the Zone and Height District Change is a recommendation, however, the City Council will independently consider the proposed ordinance together with the appeals. To ensure a complete record, Staff have responded below to all issues raised in the appeals, including those directed at the Zone and Height District Change. For the subject appeals, Staff have compiled the appeal points from the Appellants' Justification/Reason for Appeals. Staff have responded to the appeal points below.

Staff Recommendation

Planning Staff recommends that the PLUM Committee recommend that the Council Action deny the submitted appeals of Case No. CPC-2025-5194-HD-CU2-PR-ZC and sustain the City Planning Commission's determination. Based on the whole of the administrative record, there is substantial evidence to make all required findings related to the requested Class 2 Conditional Use and Project Review entitlements and to find that the project was adequately assessed under ENV-2025-5195-MND. The following statements have been compiled and summarized from the submitted appeals and responded to below.

Appeal Summary

At the conclusion of the appeal period for Case No. CPC-2025-5194-HD-CU2-PR-ZC on August 24, 2026, five (5) appeals were filed by:

- Barbara Calloway;
- Curtis Clark;
- Longwood Reynolds Trust
- Eugene Jones, James Draffen, and Jorge Rafael; and
- Behnaz Gabay, Avi Gabay, and Daniel Gabay (RGF Group, LLC)

In the following section, the appeal points and Planning Staff's responses have been grouped by appeal topic. The appeal topics relate to the Project's Design, Scale, and Programming Compatibility as it relates to the Requested Entitlements, Mitigated Negative Declaration (ENV-2025-5195-MND), and Meaningful Outreach and Representation.

Project Design, Scale, and Programming Compatibility

Appeal Point 1: The scale of the Project is not characteristic of the neighborhood and does not reflect the position and recommendations of the affected residents.

The Appellants, Barbara Calloway and RGF Group, LLC, contend that the Project is not in scale or in character with the surrounding neighborhood. Barbara Calloway argues that the Project does not reflect the position and recommendations of the affected residents who signed a submitted petition that rejected the design and scale of the proposed seven-story, self-storage facility and recommended that the Project be subject to a four-story height limitation and reasonable operating hours, and rejection of what the petition characterized as the Applicant's proposed 36-

space bicycle parking allowance in place of adequate vehicle parking. Ms. Calloway states that the 182-signature petition was hand-delivered to the PLUM Committee secretary and mailed to the offices of Councilmember Hutt and Mayor Bass, and that its terms were not meaningfully addressed in the CPC's findings. In addition, RGF Group, LLC believes that the proposed floor area ratio (FAR) increase is excessive and unexplained.

Staff Response:

In order to facilitate the development of the proposed seven-story, self-storage facility encompassing a floor area of 161,645 square feet, the Applicant requested a Zone and Height District Change from C2-1-O to (T)(Q)C2-2D-O to specifically increase the allowable FAR from 1.5:1 to 6:1. While the subject property's existing zoning of C2-1-O does not impose any height limitations of structures, it limits maximum FAR to 1:5:1. The requested Zone and Height District Change is therefore necessary to allow a greater FAR of 6:1 to accommodate the proposed FAR of 5.28:1 for the self-storage facility.

While the proposed seven-story, self-storage facility project will be greater in scale than many of the commercial and residential buildings in the vicinity currently, the CPC approved the Project based on substantial evidence which support the findings for the requested Zone and Height District Change, Project Review, and Class 2 Conditional Use Permit. The entitlement findings analyzed the Project's substantial conformance with the site's existing General Plan land use designation and the City's General Plan inclusive of the Land Use Element (Wilshire Community Plan), the Framework Element, and the Mobility Element. In addition, the findings analyzed the Project's compatibility with existing and future development on adjacent and neighboring properties, the Project's function as a service that is essential or beneficial to the community, the Project's impact on adjacent properties, the surrounding neighborhood, and the public health, welfare and safety of the community, and the Project's design which include design features such as high-quality architectural materials, breaks in the façade plane, and landscaping which will help reduce the bulk and massing of the Project and create a more pedestrian-friendly environment. Details on the Project's entitlement findings can be found on pages F-1 through F-12 of the Letter of Determination.

Furthermore, the requested Zone and Height District Change are contingent upon compliance with the "Q" Qualified Classification conditions, the "D" Development Limitations, and the Conditions of Approval imposed within the Letter of Determination. The "Q" Conditions will limit the scope and scale of the Project through the Exhibit "A" and limit on-site land uses to those permitted in the C2 Zone. The "D" Limitations will limit maximum floor area to 6:1 and maximum building height to seven stories and 85 feet. Both "Q" Conditions and "D" Limitations will ensure that the Project is compatible with the surrounding neighborhood and the overall pattern of development in the community.

Notably, the site's existing C2-1-O zoning does not limit building height or the number of stories. The "D" Limitation therefore establishes a binding height limit of seven stories and 85 feet that does not exist today, and the "Q" Condition requires that the Project be built in substantial conformance with the plans reviewed by the CPC (Exhibit "A", dated June 23, 2026), at a FAR of 5.28:1, below the 6:1 maximum (Letter of Determination, pages Q-1 and D-1).

Public participation and comments provide a critical role in the processing and approval of new development in City. While they can provide the City with meaningful insight and guidance in the

decision-making process, discretionary approval of a project must be based on the findings required by the LAMC and substantial evidence in the record, rather than on the level of support for or opposition to a project. The CPC was provided all public comments, including the petition referenced by the Appellant, prior to the decision-making meeting on July 9, 2026 in Planning Staff's Recommendation Report. In approving the Project, the CPC considered all public comments and did not adopt the petition's request for a four-story height limit. The approved Project does, however, reflect a reduction in operating hours, and the CPC imposed a "D" Limitation capping building height where none currently exists.

With regards to the Project's hours of operation, the Applicant voluntarily agreed to restrict daily operating hours to 7:00 a.m. through 10:00 p.m., in lieu of the originally proposed 6:00 a.m. through 11:00 p.m. daily operating hours, following the community's input and requests prior to the July 9th CPC meeting. The proposed hours of operation are appropriate for the storage building for household goods use and zone and are similar operating hours to other storage facilities, avoid late-night activity, and are enforceable through Condition of Approval No. 4. The building will include security features that include internally accessed storage units, a unique passcode required for building entry and elevator usage, logged entry and exit times, and parking lot lighting. Digital security cameras will record all activity in the parking lot, loading zones, elevator lobbies and internal corridors 24 hours, daily.

With regards to the number of bicycle parking spaces provided by the Project, the Appellant inaccurately claims that the Project proposes 36 bicycle parking spaces as a means of reducing vehicle parking. That characterization is not accurate: the bicycle parking spaces do not replace or reduce any automobile parking, and they are separately required by the LAMC. Under LAMC Section 12.21.A 16(a)(2), the Project is required to provide 18 short-term and 18 long-term bicycle parking spaces based on the Project's storage building for household goods use and total floor area. The Project complies with the LAMC by meeting the bicycle parking requirement.

With regards to vehicle parking spaces, the Project is subject to California Government Code Section 65863.2 (AB 2097) which prohibits local agencies from imposing any minimum automobile parking standards in developments located within one-half mile of a Major Transit Stop, as defined in Public Resources Code Section 21155(b). The Project site is located approximately 470 feet west from the intersection of West Pico Boulevard and West San Vicente Boulevard which serves as a Major Transit Stop for commuters connecting onto Metro Local Bus Line 30 and the Santa Monica Big Blue Bus 7 and Rapid 7. Therefore, the City is prohibited from enforcing any minimum vehicle parking requirements on the Project. The proposed Project voluntarily provides five vehicle parking spaces and two loading spaces within an enclosed garage off Longwood Avenue to meet the operational demands of a self-storage facility.

Appeal Point 2: The Project delivers no meaningful public benefit.

The Appellants, Barbara Calloway, Eugene Jones, and Curtis Clark, claim that the Project was approved despite the absence of any community benefit typically used to justify the scale and height of projects. Furthermore, the Appellant claims that the project creates minimal employment and no housing.

Staff Response:

As a threshold matter, none of the requested entitlements requires that a project provide a

"community benefit" or public amenity in exchange for its approval, create a particular number of jobs, or include housing. The Zone and Height District Change must be consistent with the General Plan and in conformance with public necessity, convenience, general welfare, and good zoning practice (LAMC Section 12.32 C); the Class 2 Conditional Use requires a finding that 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; and the Project Review findings address General Plan conformance and compatibility. The CPC made each of these findings based on evidence in the record (Letter of Determination, pages F-1 through F-12). The Appellants' concerns are addressed in that context below

Staff acknowledges that a self-storage facility is not a high-employment use and that the Project does not include housing. The CPC's finding instead rests on the service the Project provides. , The Project would redevelop a site currently improved with a one-story warehousing building and associated parking areas with a new seven-story, self-storage facility located along a major thoroughfare that will provide beneficial storage services to residents and commercial businesses in the neighborhood. Self-storage projects, such as the proposed Project, provide a specific need in the community to assist residents and businesses with additional space for belongings when they are unable to provide such areas on-site. In addition, the Project will feature a 376 square-foot community multi-purpose room for community members to use upon request.

As demonstrated in the Project's entitlement findings, the Project will facilitate the City's long-term fiscal and economic viability as it will provide residents and businesses the opportunity to lease storage units to store household goods. The layout and design of the project will complement the character of the surrounding properties as it will incorporate high-quality building materials, window treatments, and façade articulation that will reduce the bulk and massing of the self-storage facility. In addition, the proposed Project will be set back from the nearest residential properties by approximately 130 feet (located across San Vicente Boulevard) and will feature a landscape buffer with eight street trees that will provide shade coverage and relief from excessive sun exposure. These features will promote a safe and comfortable streetscape environment. With the proposed Project design, site layout, and setbacks, the height and scale of the Project will be compatible with the surrounding neighborhood. Therefore, the Project will enhance the general welfare of the community.

Appeal Point 3: The Project shall clarify on-site security staffing, security commitments, enforceability, and monitoring.

The Appellants, Eugene Jones and Curtis Clark, are concerned with the on-site security that will be provided by the Project and would like further clarification on Project security commitments and enforceability.

Staff Response:

Details regarding the Project's security features are described in the Applicant's Attachment "A", which was submitted upon case filing and is available in the public record. In response to community input and requests, the Applicant voluntarily revised the self-storage building's proposed hours of operation from 6:00 a.m. through 11:00 p.m., daily to 7:00 a.m. through 10:00 p.m., daily. These hours were presented and approved by the CPC. In response to the Appellants' question regarding enforceability: the hours of operation (Condition No. 4), shielded outdoor lighting (Condition No. 15), graffiti removal within 24 hours (Condition No. 10), and site

maintenance (Condition No. 11) are enforceable Conditions of Approval, and the Project must be built in substantial conformance with the approved plans (Condition Nos. 3 and 5). In addition, Condition No. 26 reserves to the CPC and the Director of Planning the authority to impose additional corrective conditions if they prove necessary for the protection of persons in the neighborhood or occupants of adjacent property. The Project will include security features that include internally accessed storage units, a unique passcode required for building entry and elevator usage, logged entry and exit times, and maximum parking lot lighting. Access into the building would occur through the ground floor lobby with two elevators and stairwells at the southwestern and northeastern corners of the Property, and secured parking access through a single, two-way driveway on Longwood Avenue. The Project will include on-site staffing during operating hours, together with digital security cameras recording all activity (24 hours, daily) in the parking lot, loading zones, elevator lobbies and internal corridors, with no blind spots. All locks on storage units will be provided by the operator to ensure maximum security. Customer pin codes will not allow access outside of operating hours. Internally, the building utilizes motion detection for lighting along main corridors after hours to save energy.

Appeal Point 4: The approval of the Project conflicts with adopted planning policy and is not justified as good zoning practice.

The Appellant, Longwood Reynolds Trust, claims that the allowable floor area increase permitted through the Zone and Height District Change is not justified for a low-employment, low-activity warehouse use adjoining residences, and therefore does not demonstrate good zoning practice. The Appellant, RGF Group, LLC, similarly contends that the increase from a 1.5:1 to a 6:1 FAR, a four-fold increase, is excessive and has not been explained.

Staff Response:

The Appellant takes issue with one of the Zone and Height District Change entitlement findings in the Letter of Determination (Finding No. 2, page F-6) which analyzes conformance with the public necessity, convenience, general welfare, and good zoning practice. Contrary to the assertion that the increase is unexplained, the CPC's findings explain both the need for, and the limits on, the additional floor area. With respect to conformance with good zoning practice, the CPC determined that the proposed Zone and Height District Change will be consistent with the General Plan Framework Element, the Wilshire Community Plan, and the General Plan's Community Commercial land use designation, and the C2 zoning of the subject property. The property's existing C2-1-O Zone and the proposed (T)(Q)C2-2D-O Zone both permit storage buildings of household goods (subject to a Class 2 Conditional Use within 500 feet of an R Zone) on the Project site, and Height District Nos. 1 and 2 both provide no limitations on height or number of building stories. Encompassing a total lot area of 30,613 square feet, the Project site's existing C2-1-O zoning would limit the maximum floor area of the proposed Project to a FAR of 1.5:1, or 45,920 square feet. In order to facilitate the development of the proposed self-storage building encompassing a floor area of 161,645 square feet, the Applicant requested a Zone and Height District Change to specifically increase the allowable FAR from 1.5:1 to 6:1. The requested Zone and Height District Change was found necessary to allow the proposed FAR of 5.28:1.

With respect to the characterization of the use as low-employment and low-activity, the CPC found that these same operational characteristics, low customer turnover and limited trip generation, are what allow a building of this scale to be compatible with nearby residential uses while still providing a service that is beneficial to the community. Good zoning practice does not require that

additional floor area be accompanied by high employment; it requires that the zoning be consistent with the General Plan and appropriate for the site, which the CPC found based on the evidence in the record.

In addition, Project Review and Class 2 Conditional Use Permit findings analyzed how the Project demonstrates good zoning practice. As discussed above in Staff's Response to Appeal Point No. 1, the findings analyzed the Project's compatibility with existing and future development on adjacent and neighboring properties, the Project's function as a service that is essential or beneficial to the community, the Project's impact on adjacent properties, the surrounding neighborhood, and the public health, welfare and safety of the community, and the Project's design and layout in relation to the surrounding neighborhood. The Project will facilitate the City's long-term fiscal and economic viability as it will provide residents and businesses with the opportunity to lease additional storage space for their belongings. The Project will redevelop a site currently improved with a one-story warehousing building and parking areas with a new seven-story, self-storage facility located along a major thoroughfare and will create a safer and more pedestrian-friendly environment. Based on the findings and evidence in the record, the Project demonstrates good zoning practice.

Appeal Point 5: The Conditional Use findings are unsupported, conclusory, and internally inconsistent and the Project Review findings and do not analyze project compatibility with the surrounding neighborhood.

The Appellant, Longwood Reynolds Trust, argues that the Class 2 Conditional Use Permit findings are unsupported, conclusory, and internally inconsistent because they assert that the Project will activate the street and attract commercial activity while relying on low customer turnover and low traffic to establish compatibility. The Appellant also argues that the Project Review findings describe the Project but do not analyze its actual compatibility as it improperly relies on the requested Zone and Height District Change which has not yet been adopted by the City. The Appellant, RGF Group, LLC, similarly contends that the Letter of Determination does not identify the evidence supporting the finding required by LAMC Section 12.24 W.50 that the Project is compatible with the scale and character of the adjacent properties and surrounding neighborhood, which it describes as built at a much lower scale. The Appellants, Eugene Jones, James Draffen, and Jorge Rafael, note that other storage facilities within a five-mile radius do not exceed four stories.

Staff Response:

The Conditional Use findings are not internally inconsistent. The findings' references to activating the street frontage describe the Project's ground-floor design and streetscape improvements, including a storefront entrance near San Vicente Boulevard and Longwood Avenue, a landscape buffer with eight street trees, lighting, and sidewalk improvements that would replace a one-story warehouse and surface parking lots (pages F-2 and F-8). The references to low customer turnover describe the intensity of vehicle trips and on-site activity associated with the use. A project can improve the pedestrian environment along its frontage while generating relatively few vehicle trips; the two observations are complementary and together support the CPC's conclusion that the Project will be compatible with nearby residential uses.

The Project site is located within an urbanized neighborhood comprised of commercial, public facilities, and residential uses. Properties surrounding the Project site are developed with

commercial and public facilities uses including an auto service facility, commercial-warehouse buildings consisting of photo studios and a market, LADWP Distributing Station No. 8, and two-story apartment buildings across San Vicente Boulevard. While the proposed self-storage facility project will be greater in scale than many of the existing buildings in the vicinity, the existing C2-1-O zoning of the site, and of the C2-1-O properties to the east and south, does not limit building height or the number of stories (Letter of Determination, page F-9). The scale of existing buildings therefore does not define the scale of development that the zoning permits. The size of storage facilities elsewhere in the region is likewise not a criterion for the required findings, which evaluate the Project's compatibility with adjacent properties and the surrounding neighborhood. The CPC ultimately approved the Project based on substantial evidence which supports the findings for the requested entitlements including a Project Review and Class 2 Conditional Use Permit.

In order to grant the Project Review, CPC must make the following three findings:

(1) The project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan, and any applicable specific plan.

(2) The project consists of an arrangement of buildings and structures (including height, bulk and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements that is or will be compatible with existing and future development on adjacent properties and neighboring properties.

(3) The residential project provides recreational and service amenities to improve habitability for its residents and minimize impacts on neighboring properties.

In order to grant the Class 2 Conditional Permit, CPC must make the following four findings:

(1) The project will enhance the built environment in the surrounding neighborhood or will perform a function to 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 applicable specific plan.

(4) The project provides for an arrangement of uses, buildings, structures, open spaces and other improvements that are compatible with the scale and character of the adjacent properties and surrounding neighborhood.

The Project Review and Conditional Use findings analyzed the Project's substantial conformance with the site's existing General Plan land use designation and the City's General Plan inclusive of the Land Use Element (Wilshire Community Plan), the Framework Element, and the Mobility Element. The CPC determined that the Project will provide a beneficial service to the community by contributing to the community's economic viability and offering individuals a necessary amenity for the storage of excess household goods that cannot be accommodated by their home's existing storage capacity.

Contrary to RGF Group, LLC's contention, the CPC made the appropriate compatibility findings based on specific evidence in the record, including: the 130-foot-wide San Vicente Boulevard right-of-way separating the Project from the nearest residential uses to the north; the approximately 60-foot separations from the LADWP Distributing Station No. 8 and the automotive repair facility across Longwood Avenue and Tremaine Avenue; the 15-foot separation from the commercial buildings to the south across the alley; the absence of any directly abutting residential use; the location of all vehicular access, parking, and loading within an enclosed garage accessed from Longwood Avenue; the limited hours of operation; shielded lighting; and the Project's façade articulation, materials, and landscaping (pages F-8 through F-12). The Project will be designed in a manner that is compatible with the surrounding neighborhood by utilizing high-quality materials, façade articulation, landscaping, and lighting to express a clear and coherent design. These features will help reduce the bulk and massing of the self-storage building and improve the pedestrian experience. The Project will also comply with the LAMC and AB 2097 with regards to bicycle and automobile parking requirements by providing 36 bicycle spaces, five automobile parking spaces, and two loading spaces accessible from a new two-way driveway along Longwood Avenue. AB 2097 prohibits local agencies from imposing automobile parking requirements for developments located within one-half mile of a Major Transit Stop. The proposed Project voluntarily provides five automobile parking spaces and two loading spaces to meet the operational demands of a self-storage facility. Landscaping, lighting, and a surveillance camera system will be incorporated along the perimeter of the site to promote a safe and comfortable environment for patrons and pedestrians. Regarding on-site security, the Project will provide premium security features that include internally accessed storage units, a unique passcode required for building entry and elevator usage, logged entry and exit times, and maximum parking lot lighting. The Project will only be accessible during the hours of operation from 7:00 a.m. to 10:00 p.m., daily. In addition to assessing the proposed height and FAR relative to the surrounding neighborhood, the Project Review and Conditional Use findings included an analysis of the transitional corridor on which the Property is located, an analysis of the surrounding land use patterns, the Property's role as a logical transition given the surrounding residential, commercial, light industrial, and public facility uses in the vicinity, the Project's pedestrian and vehicular access, the nearby major transit corridors including San Vicente Boulevard and Pico Boulevard, and considerations relating to the existing unlimited height permitted under the Property's existing zoning. Based on the findings and analyses provided in the Letter of Determination, the Project will be compatible with the surrounding neighborhood.

Lastly, the Longwood Reynolds Trust's contention that the Project Review findings improperly rely on a Zone and Height District Change that has not yet been adopted misunderstands the relationship between the approvals. The Zone and Height District Change, Class 2 Conditional Use, and Project Review were filed and considered together for a single project and are before the City Council together. The Class 2 Conditional Use and Project Review authorize only the Project shown in Exhibit "A", a 161,645-square-foot building at a FAR of 5.28:1, and the Conditions of Approval require compliance with all area, height, and use regulations of the property's zone classification (Condition Nos. 2 and 28). That building cannot be permitted under the 1.5:1 FAR of the existing C2-1-O Zone. Accordingly, if the City Council were to decline to adopt the Zone and Height District Change, the Project as approved could not be built. The compatibility findings themselves do not rest on a zoning envelope; they evaluate the actual building proposed, including its height, bulk, setbacks, materials, access, and operations, in relation to existing development on adjacent and neighboring properties. Nor did the CPC fail to consider height limits under the existing zoning: the C2-1-O Zone does not impose one (pages F-

9 and F-11).

Appeal Point 6: The City shall provide clarification on the use and ownership of the southern adjacent alley.

The Appellants, Eugene Jones and Curtis Clark, request that the City obtain and review documentary evidence related to the southern adjoining alley which they understand to be a privately-owned easement associated with a neighboring property owner. The Appellants' comments insinuate that the City lacks the authority to allow the Applicant's requested waiver and that the Applicant intends to use the public alley for the Project. The Appellants also state that the alley has only one entry and does not function as a through alley, and ask whether any reconstruction of the alley was required or approved.

Staff Response:

The southern adjoining alley is a City public right-of-way that is required to have a minimum width of 20 feet with a 10-foot half-width right of way from the center line of the alley to the subject property. In BOE's Inter-Departmental Correspondence dated May 6, 2026, BOE required a 2.5-foot wide strip of land be dedicated along the property frontage to complete a 10-foot half right-of-way and that the Project construct additional surfacing to join the existing improvements to provide a 17.5-foot wide alley, including 2-foot longitudinal concrete gutter. These improvements should suitably transition to join the existing improvements satisfactory to the City Engineer. Through the Zone and Height District Change entitlement request, the Applicant requested to waive the requirement to dedicate and/or improve an additional 2.5 feet of the existing public alley. At the July 9, 2026 CPC meeting, the CPC approved the waiver request based on the evidence in the record and the findings for the entitlement. As detailed in Finding 1d (pages F-3 through F-4) of the Letter of Determination, strict compliance to the dedication and improvement requirements along the alley will not promote the City's mobility needs as depicted in the Mobility Plan 2035 as they would require the relocation of substantial utilities (i.e. power poles) along the alley and would solely impact an approximately 330-foot mid-block path between two street blocks, Tremaine Avenue and Longwood Avenue. Both streets can be accessed via San Vicente Boulevard and Pico Boulevard approximately 155 feet north and south of the alley. Since regional and local circulation is already efficiently absorbed by these primary streets, widening this isolated alley segment would fail to yield a significant or measurable improvement to the local circulation network. In addition, the Project does not propose building or site access from the alley. The only work associated with the alley under the CPC's (T) Conditions is the replacement of the existing curb ramps and alley intersections where the alley meets Longwood Avenue and Tremaine Avenue, and the construction of sewer laterals connecting the Project to the existing sewer mainline located in the alley, both subject to BOE review and permitting (Letter of Determination, pages T-1 through T-2)

The existing alley is also currently partially obstructed by privately-owned structures by an adjacent and separate southern property owner, which prohibits east-west travel between Tremaine Avenue and Longwood Avenue. Private owners cannot legally block a public right-of-way or an official public street, and the obstruction of the public right-of-way by an adjacent property owner has been forwarded to the Department of Transportation for enforcement. The Project does not intend to alter the current use of the public alley for the Project and adjacent property owners, nor does the Project require use of the alley to access the site.

Mitigated Negative Declaration (ENV-2025-5195-MND)

Appeal Point 7: The City did not evaluate a stable, accurate, and internally consistent project under CEQA.

The Appellant, Longwood Reynolds Trust, contends that the City did not evaluate a stable, accurate, and internally consistent project under CEQA as the air quality, noise, energy, and greenhouse gas (GHG) studies analyzed a 175,047 square-foot self-storage facility project as opposed to the 161,645 square-foot project that was approved by the CPC, and the cultural resources report analyzed a six-story self-storage facility project as opposed to the approved seven-story project. The Appellant further contends that since the cultural resources report references a shorter project, the report cannot support the conclusions with regards to the Project's impact on the adjacent Los Angeles Department of Water and Power (DWP) Distributing Station No. 8.

Staff Response:

The Appellant is correct in that the Project's air quality, noise, energy, and greenhouse gas (GHG) studies analyzed a 175,047 square-foot self-storage facility project as opposed to the approved 161,645 square-foot project and that the cultural resources report analyzed a six-story self-storage facility project as opposed to the approved seven-story project. These studies and reports were conducted prior to the Project's final revisions which reduced the Project's total floor by approximately 7.7 percent and increased the Project's height by one-story. Nevertheless, the Project's Initial Study/Mitigated Negative Declaration document accurately depicted the Project Description in Section 3 (Page 3-1 through Page 3-15).

With regards to the reduction in floor area depicted in the air quality, noise, energy, and greenhouse gas (GHG) studies, the Applicant's technical consultants have confirmed that the modeled construction and operational results for each of these environmental factors are equal to or greater than the results that would be obtained for the approved Project, and that no component of the approved Project was omitted from the program analyzed. In fact, the prepared studies present a significantly more conservative analysis of potential environmental impacts based on the assumption of a larger project footprint. Even under that more conservative analysis, the MND correctly concludes that the Project would not result in any significant environmental impacts on the environment with the incorporation of the proposed mitigation measures.

Technical studies that model a somewhat larger development program than the project ultimately approved do not render a project description unstable where, as here, the MND's Project Description accurately describes the Project and the analysis captures its impacts. In addition, recirculation of a negative declaration is not required where new information merely clarifies, amplifies, or makes insignificant modifications to the document (CEQA Guidelines Section 15073.5(c)(4)). A reduction in floor area that does not result in any new or more severe impact does not require recirculation.

With regards to the increased building height depicted in the cultural resources report, the Project's building height will not be a contributing factor in determining any potential impacts on cultural resources. As stated in the Cultural Resources Report, "[t]he Department of Water and Power Distributing Station No. 8 was built in 1939 and most of the surrounding buildings and

landscape features from that era have been removed or are not recognizable. Therefore, the neighborhood does not appear to possess any characteristics that convey this resource's historical significance and development of the project will not result in a substantial adverse effect to this historical resource" (pages ii and 17). The analysis and conclusion with regards to potential cultural impacts is not based on or dependent on the Project's building height, whether the proposed self-storage facility is six- or seven stories tall. An impact on a historical resource is significant only where a project would cause a substantial adverse change in its significance, meaning the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that its significance would be materially impaired. The Project would not physically alter Distributing Station No. 8, which is located across Longwood Avenue, approximately 60 feet from the Project. Since the Cultural Resources Report found that the station's historic-era setting has already been substantially altered and no longer conveys the resource's significance, the addition of one story to a multi-story building on the same site would not change that conclusion.

Therefore, despite the minor discrepancies with Project description that was analyzed in the Initial Study/Mitigated Negative Declaration and the approved Project by the CPC, the record demonstrates that the approved Project's impacts were fully analyzed and the Project will not result in significant environmental impacts.

Appeal Point 8: The MND cannot be sustained where substantial evidence supports a fair argument of significant effects.

The Appellants, Barbara Calloway and Longwood Reynolds Trust, claim that the Project's MND cannot be sustained based on the project description discrepancies detailed under Appeal Point 7 and that submitted resident and expert evidence must be considered under CEQA's fair argument test.

Staff Response:

As referenced by the Appellants, for the purposes of CEQA, the Project's MND is subject to the "fair argument" standard of review under which the lead agency must prepare an Environmental Impact Report whenever "substantial evidence" in the record supports a "fair argument" that the project may have a significant effect on the environment. According to Public Resources Code § 21080(e), "substantial evidence" is defined as including a "fact, a reasonable assumption predicated upon fact, or expert opinion supported by fact" and "is not argument, speculation, unsubstantiated opinion or narrative, evidence that is clearly inaccurate or erroneous, or evidence of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment".

In many instances the Appellants contend that the Project's MND inadequately addresses environmental impacts associated with the Project without substantial evidence. The CEQA appeal points that are addressed under this appeal topic are comprised of argument, speculation, and unsubstantiated opinion which does not constitute as substantial evidence. The appeals assert that the project description discrepancies (addressed in Appeal Point 7), the Project's height, and the Project's proximity to the LAPD helipad (addressed in Appeal Point 13) give rise to a fair argument, but do not provide facts, reasonable assumptions predicated on facts, or expert opinion supported by facts showing that any of these circumstances may result in a significant physical effect on the environment. The Longwood Reynolds Trust appeal refers generally to "any

resident and expert evidence submitted," but does not identify any expert report or specific factual evidence. While residents' personal observations may constitute substantial evidence on non-technical matters, unsubstantiated concerns and opinions on technical issues such as aviation safety, air quality, noise, or hazardous materials do not. Concerns regarding property values, neighborhood stability, and other economic or social effects likewise are not evidence of a significant environmental effect unless they would result in a physical change to the environment. In addition, , the Project's MND is supported by comprehensive studies and analyses that conclude that the Project will not result in significant environmental impacts with the imposition of the Mitigation Measures and Mitigation Monitoring Program that are conditioned in the Letter of Determination's Conditions of Approval.

Appeal Point 9: The noise and vibration conclusions should be reconsidered against the final approved project and correct receptor assumptions.

The Appellant, Longwood Reynolds Trust, contends that the noise and vibration analysis that was prepared for the Project's MND be reconsidered as it analyzed a Project with a greater floor area than what was approved by the CPC (a 175,047 square-foot self-storage facility was analyzed in the noise and vibration analysis and a 161,645 square-foot self-storage facility was approved) and that the analysis applies inconsistent distance assumptions for annoyance versus building-damage vibration thresholds.

Staff Response:

As described in Staff Response to Appeal Point 7, the analysis of a 175,047 square-foot self-storage facility presents a more conservative analysis of potential environmental impacts based on the assumption of a slightly larger development program. In addition, the prepared noise and vibration analysis considers hours of operation that are greater than what was approved by the CPC as the Applicant voluntarily proposed a reduction in operating hours from 6:00 a.m. – 11:00 p.m., daily to 7:00 a.m. – 10:00 p.m., daily in response to community input. Under a more conservative analysis, the MND correctly concludes that the Project would not result in a significant noise or vibration impact.

In addition, the Appellant incorrectly asserts that the Project's noise and vibration analysis applies inconsistent distance assumptions for annoyance and building-damage thresholds. The analysis for determining whether or not the Project would have a significant vibration annoyance measures the impact on sensitive receptors (i.e. people), which is distinct from the analysis for determining the vibration damage to the nearest receptors (i.e. buildings). This is clarified in Table I Potential Construction Vibration Annoyance Impacts at Nearest Receptor and Table J Potential Construction Vibration Damage Impacts at Nearest Receptor, footnote 2 of the associated Noise and Vibration Impact Report (MND, Appendix G, pp. 20-21).

Appeal Point 10: The City must evaluate actual truck turning, queuing, and pedestrian/bicycle conflicts particularly along Longwood Avenue and confirm that the bicycle-parking allocation reflects a good-faith calculation rather than a device to avoid appropriate automobile-parking and loading analysis.

The Appellants, Longwood Reynolds Trust and RDF Group LLC, contend that the City should provide a comprehensive transportation analysis that evaluates automobile, bicycle, and pedestrian traffic as it relates to Project access, safety, and vehicular and bicycle parking supply.

RGF Group, LLC contends that routing all vehicle and truck traffic through the Project's single driveway on Longwood Avenue conflicts with how neighboring tenants and businesses currently use that street for on-street parking and access, and that this undermines the compatibility finding. Barbara Calloway questions whether the parking plan reflects the likely use of the site.

Staff Response:

With respect to the automobile parking and bicycle parking requirements, the Project will meet the minimum requirements set forth by the Los Angeles Municipal Code (LAMC) and Assembly Bill (AB) 2097. According to LAMC Section 12.21 A.16(a)(2), the Project is required to provide 18 short-term parking spaces and 18 long-term parking spaces. The Project is also subject to AB 2097 which prohibits local agencies from imposing automobile parking requirements for developments located within one-half mile of a Major Transit Stop. The Project site is located approximately 470 feet west from the intersection of West Pico Boulevard and West San Vicente Boulevard which serves as a Major Transit Stop for commuters connecting onto Metro Local Bus Line 30 and the Santa Monica Big Blue Bus 7 and Rapid 7. Therefore, the City is prohibited from enforcing any minimum automobile parking requirements on the Project. The proposed Project complies with the LAMC by providing the required 18 short-term and long-term bicycle parking spaces. In addition, the proposed Project voluntarily provides five automobile parking spaces and two loading spaces within an enclosed garage off Longwood Avenue to meet the operational demands of a self-storage facility. Findings for the requested entitlements addressed the adequacy of the proposed number of automobile and bicycle parking spaces by analyzing the compatibility of the proposed parking with existing and future development in the vicinity of the Property, the compatibility of the proposed parking with the scale and character of the vicinity of the Property, and the compatibility of the Project with public health, welfare and safety.

Contrary the Appellants' claim that an inadequate transportation study was prepared to evaluate actual truck turning, queuing, and pedestrian/bicycle conflicts, the Project's MND evaluated transportation impacts consistent with the Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines (TAG). Based on the trip generation, the proposed Project is anticipated to generate a net of 194 daily passenger trips, less than the 250 daily trip screening threshold for further Vehicle Miles Travelled (VMT) analysis. Pursuant to Public Resources Code Section 21099 and CEQA Guidelines Section 15064.3, automobile delay and level of service are no longer considered significant environmental impacts under CEQA, and the availability of parking is not, in itself, a physical environmental impact. Additionally, the Project's proposed driveway off Longwood Avenue would provide 25 feet, 6 inches of space, the garage ramp would provide 18 feet of space, and the internal garage drive aisle would provide between 25 feet to 25 feet, 4 inches of space. These dimensions provide adequate space for two-axle trucks to maneuver in and out of the garage. With respect to RGF Group, LLC's concern regarding Longwood Avenue, the Project places its vehicle access on Longwood Avenue, a local street, specifically to avoid conflicts on San Vicente Boulevard and Pico Boulevard (Letter of Determination, page F-2). All parking and loading activity, including moving trucks, would occur within the Project's site rather than on the street. In addition, Condition of Approval No. 7 and the (T) Conditions require the Applicant to submit a parking area and driveway plan to LADOT and BOE for review and approval, so that the driveway design, sight distance, and pedestrian safety are reviewed against City standards before permits are issued. Therefore, the Project would not substantially increase hazards due to a geometric design feature or incompatible use, and its truck access, queuing, and pedestrian and bicycle interactions were adequately addressed.

Appeal Point 11: The City must verify the hazardous materials analysis and may not defer essential investigation.

The Appellant, Longwood Reynolds Trust, argues that the Project's MND provides an inadequate hazardous-materials analysis, citing the Project's Phase II Environmental Site Assessment (ESA), and claims that "the complete record must demonstrate specific, enforceable mitigation measures rather than open-ended future study."

Staff Response:

Contrary to the Appellant's assertion that the Project does not include an adequate hazardous-materials analysis, the Project's MND provides a comprehensive analysis through the preparation of a Phase I and Phase II ESA by Hazard Management Consulting in February 2025 and July 2025, respectively.

The Phase I ESA identified recognized environmental conditions (RECs) associated with a former gasoline station that operated at the site in 1929, a former clothing manufacturing facility that operated during the 1950s through the 1970s, and the Property's location within a City-designated Methane Zone. The Phase I ESA also identified suspect asbestos-containing materials (ACMs) as a non-scope environmental consideration. In accordance with the Phase I ESA recommendation, a Phase II ESA was completed for the Project site.

The Phase II ESA included soil and soil-vapor testing and found that total petroleum hydrocarbons, volatile organic compounds (VOCs), and metals in soil were below applicable commercial/industrial regulatory screening criteria. The Phase II ESA concluded that the soil testing results did not identify a significant release of hazardous chemicals. Based on these results, the Phase II ESA specifically recommended no further investigation for soil or VOCs in soil vapor.

The Phase II ESA also addressed methane and identified elevated methane concentrations, concluding that the Project will likely require a Los Angeles Department of Building and Safety (LADBS) Level V methane mitigation system. Because the Project proposes redevelopment, the remaining methane testing is not an open-ended investigation intended to determine whether an environmental impact exists. Rather, it is a design-level testing requirement administered under established LADBS standards to determine the precise methane design level and corresponding mitigation-system specifications applicable to the Project.

In addition, because the Project site is within a City-designated Methane Zone, it is independently subject to Division 71 of the LAMC, the City's Methane Seepage Regulations. Projects within a Methane Zone must be evaluated for methane hazard and provided with an appropriate mitigation system based upon the site's methane design level. The MND explained that LADBS review will confirm completion of the required methane investigation and incorporation of a methane mitigation system meeting or exceeding applicable City standards and any Project-specific requirements imposed by LADBS and the Los Angeles Fire Department (LAFD). These are mandatory, enforceable regulatory requirements tied to issuance of the building permit and are not discretionary future mitigation that may or may not be implemented.

With regards to ACMs, the Phase II ESA recommended an asbestos survey prior to demolition or

disturbance of suspect materials. Under the regulatory requirements identified in the MND, a Certified Asbestos Consultant must conduct the survey before demolition or renovation. The notification, removal, and disposal of any asbestos-containing materials identified are governed by South Coast Air Quality Management District (SCAQMD) Rule 1403. Therefore, the future asbestos survey does not leave the means of addressing a potentially significant environmental effect unresolved. The survey determines whether an existing mandatory regulatory abatement program must be implemented before demolition.

In summary, the Phase II ESA had evaluated the potential soil and soil-vapor contamination associated with historical uses and determined that no additional investigation of soil or VOCs is warranted. The remaining methane testing and asbestos survey are implementation- and design-level requirements governed by mandatory standards that specify the actions required based upon the test results and must be satisfied through the City's permitting process before construction or demolition may proceed. As noted in the Project's MND, no mitigation measures are necessary for these hazards, and the Project does not constitute impermissible deferred mitigation or open-ended future environmental study. The Project's MND and hazardous-materials analysis established the nature and extent of the potential hazards, identified the applicable performance standards and required protective measures, and relied on mandatory regulatory requirements that will be enforced through the established demolition and building permit processes. The Project's MND concluded that the Project would not create a significant hazard to the public or environment through reasonably foreseeable upset or accident conditions and that impacts would be less than significant.

Appeal Point 12: The Project does not contain a construction engineering survey or comparable technical documentation with regard to a development of this size and height.

The Appellants, Eugene Jones and Curtis Clark, claim that no construction engineering survey or comparable technical documentation concerning a 161,645 square-foot, seven-story self-storage facility project was disclosed to the affected community.

Staff Response:

The Project's MND includes numerous studies and analyses that support the conclusion that the Project will not result in significant impacts on the environment. The MND is not required to and does not itself contain construction engineering surveys, however the proposed size and height of the Project were assessed during case processing and in the review of various environmental factors in the preparation of the Project's Initial Study/Mitigated Negative Declaration.

During entitlement case processing, City Planning reviews a development proposal using architectural plans and technical studies and analyzes the development's potential environmental impacts. Full engineering and construction studies are typically prepared during the post-entitlement construction process, though significant analysis of a development proposal may be found within the documentation prepared for purposes of compliance with CEQA. Engineering- and construction-level design typically occurs for development projects during the Plan Check phase with LADBS. This typically occurs after the Planning phase and approval of the development project. During this process, the City will review the structural plans and determine if the plans are compliant with the following: Building Code; Structural Adequacy; Fire and Life Safety; Energy Code; Accessibility or Americans with Disabilities Act (ADA); and Zoning Compliance. These plans will also be reviewed by the City's Grading Division, Fire Department,

and all other relevant City departments. Since the Project is required to comply with this process, a separate engineering survey is not required during the entitlement review phase and it would be premature for the Project to provide such survey to the public.

The Project's MND is supported by technical reports which include an arborist report (inclusive of a tree inventory), an air quality, energy, and greenhouse gas report, a cultural resources report; a geotechnical engineering investigation report; a Phase I environmental site assessment, a Phase II environmental site assessment, and a noise and vibration impact analysis. These reports provide substantial evidence which supports the MND's analysis and conclusions relating to the Project's potential environmental impacts.

Appeal Point 13: The City fails to provide an analysis of the Project's impact on aviation safety based on the Property's proximity to a helipad located on the roof of the Los Angeles Police Department's (LAPD) Wilshire Community Police Station.

The Appellants, Barbara Calloway, Eugene Jones, and Curtis Clark, are concerned with regards to the Project's proximity to the LAPD Wilshire Community Police Station's helipad as it may impact aviation safety and emergency response helicopter operations. The Appellant, Barbara Calloway, argues that the Project's MND is inadequate because it does not provide an analysis of the Project's impact on aviation safety based on the Property's proximity to the LAPD helipad and the Project's installation of rooftop solar panels.

Staff Response:

The CEQA Guidelines Appendix G checklist question on airport hazards addresses projects located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport (Public Resources Code Section 21096), The MND analyzed this threshold. A rooftop police helipad is not a public airport, and neither CEQA nor the Appendix G checklist establishes a separate threshold for helipads. The Project's MND adequately complied with CEQA's requirements and included an analysis of potential airport-related safety hazards and conclusions based on such analysis. The appeals do not include evidence, such as an obstruction surface analysis or the opinion of an aviation expert, indicating that an 85-foot building at this location would penetrate a protected airspace surface associated with the helipad or otherwise interfere with helicopter operations. The Appellants' concerns are speculative and do not constitute substantial evidence of a significant environmental effect under CEQA. Similarly, with respect to the rooftop solar panels required by Condition No. 19, which implements the Los Angeles Municipal Green Building Code, the appeals provide no evidence that the panels would create a glare hazard for helicopter operations.

Current Federal Aviation Administration (FAA) policy requires notice for construction or alteration that is more than 200 feet above ground level (AGL); at 85 feet AGL, the Project is 115 feet below that general threshold. Therefore, FAA notice and a formal FAA obstruction-evaluation study are not required for the proposed structure. Furthermore, the FAA's 2021 solar-energy policy does not require a formal glint or glare analysis for the Project's off-airport rooftop installation, and the appeals provide no project-specific evidence demonstrating a glare hazard.

Based on the evidence in the record, the Project will not result in significant impacts related to aviation safety.

Appeal Point 14: The City must address cumulative construction and operational impacts using a supported, disclosed project list.

The Appellant, Longwood Reynolds Trust, argues that the City must address cumulative construction and operational impacts using a supported, disclosed project list. They also argue that a less-than significant cumulative-impact conclusion must rest on an actual, disclosed cumulative setting.

Staff Response:

Contrary to the Appellant's claim that the City did not address cumulative impacts using a supported and disclosed project list, the Project's MND includes an actual and disclosed cumulative setting consistent with CEQA Guidelines Sections 15064(h) and 15130 in Table 4.21-1, page 4-135.

Table 4.21-1 of the Project's MND identifies three reasonably foreseeable projects and provides their addresses, distances from the Property, proposed uses, development sizes, and development status. All three projects are identified as residential development projects "to be constructed".

In addition, the geographic scope of a cumulative analysis varies by environmental topic. CEQA Guidelines Section 15130(b)(3) directs the lead agency to define the area affected by each cumulative effect and to explain why that area is appropriate. Regional impacts are evaluated against the entire area in which the effect occurs, rather than against a list of nearby projects. Regional air quality emissions, for example, are evaluated across the South Coast Air Basin using the SCAQMD regional thresholds, which account for basin-wide growth. Greenhouse gas emissions are evaluated for consistency with adopted statewide, regional, and local plans to reduce emissions. Construction noise and vibration, localized air quality, and construction traffic, by contrast, can only combine with impacts from projects close enough to affect the same receptors. For these localized impacts, the MND correctly identified the three reasonably foreseeable related projects within a 0.5-mile radius of the site in Table 4.21-1. Because each topic was evaluated against the appropriate cumulative setting, the MND's conclusion that the Project's incremental effects are not cumulatively considerable is supported by substantial evidence.

Appeal Point 15: All mitigation measures must be specific, enforceable, and incorporated into the Project, not deferred.

The Appellant, Longwood Reynolds Trust, claims that the City must demonstrate that tribal-cultural, hazardous-materials, noise, tree, and construction mitigation measures state performance standards, timing, and enforcement.

Staff Response:

With regards to mitigation measures associated with Tribal Cultural Resources, the Project's MND and Mitigation Monitoring Program (pages C-3 through C-5 of the Letter of Determination) identifies three mitigation measures (MM-TCR-1, MM-TCR-2, and MM-TCR-3), which contain specific implementation timing, monitoring, documentation, and performance requirements and were recommended by the consulted tribe. Consistent with both the requirements of CEQA and

the City's practices relating to CEQA, all mitigation measures would be enforced and incorporated into the Project by way of the approved Conditions of Approval, which would incorporate the MND's Mitigation Monitoring Program. In approving the Project, the CPC found that the mitigation measures have been made enforceable conditions on the Project, and Condition Nos. 20 through 23 require implementation of each measure, monitoring by an independent Construction Monitor, and compliance reporting every 90 days during construction.

With regards to hazardous materials, noise, and trees, the Project's MND did not identify any significant impacts for these environmental factors, nor did it require or recommend any mitigation measures for these analyzed factors. Therefore, the Appellant's concern about enforceability and deferral of mitigation for these issues is unwarranted and unsupported.

Meaningful Outreach and Representation

Appeal Point 16: Revisions to the Project's waiver request and hours of operation did not allow for meaningful public participation.

The Appellant, Longwood Reynolds Trust, claims that the revisions to the public hearing notice and the record, specifically with regard to the public improvement waiver requests and the hours of operation, were submitted on July 6, 2026, three days prior to the July 9, 2026 CPC meeting and therefore did not allow for meaningful public participation.

Staff Response:

The Project's original project description and entitlement requests included hours of operation from 6:00 a.m. to 11:00 p.m., daily, and two waivers as part of the Project's Zone Change and Height District Change request. The waivers include:

a) A waiver of the requirement to dedicate and/or improve an additional 2.5 feet of the existing public alley; and
b) A waiver of the requirement to improve an additional 3 feet of street widening along South Longwood Avenue.

The Project's hours of operation and waiver requests were reflected in the public hearing notice, which was mailed to owners and occupants within a 500-foot radius at least 24 days prior to the Hearing Officer hearing on May 12, 2026. Following the Hearing Officer hearing, the Applicant revised the proposed hours of operation and waiver requests after listening to community input and receiving the Bureau of Engineering's improvement recommendations.

With regards to the hours of operation, the Applicant voluntarily agreed to restrict the proposed operating hours from 6:00 a.m. to 11:00 p.m., daily to 7:00 a.m. to 10:00 p.m., daily in response to community input and requests. The revision will not result in a project impact that is greater than previously analyzed under the Project's MND as the operating hours have been reduced by two hours.

With regards to the waiver requests, the Applicant withdrew its request to waive the requirement to improve an additional 3 feet of street widening along South Longwood Avenue following BOE's Inter-Departmental Correspondence dated May 6, 2026. The waiver request was initially requested for relief from potential requirements along the corridor. With the issuance of BOE's

recommendation report however, BOE's improvement recommendations did not require that the Project provide an additional 3-foot street widening along South Longwood Avenue. Therefore, prior to the July 9, 2026 CPC meeting, the waiver request was withdrawn and the only waiver requested by the Applicant was the waiver of the requirement to dedicate and/or improve an additional 2.5 feet of the existing public alley. The withdrawal of the waiver request will not result in a project impact that is greater than previously analyzed under the Project's MND.

Revisions to a project's entitlement requests and description are typical throughout case processing and may be modified for consideration by the decisionmaker. Under CEQA, recirculation of a mitigated negative declaration is not required where project revisions are made in response to comments and do not create new significant effects, or where new information merely clarifies or makes insignificant modifications (CEQA Guidelines Section 15073.5(c)(2) and (c)(4)). CEQA Guidelines Section 15074.1, cited by the Appellant, governs the substitution of mitigation measures; no mitigation measures were substituted or removed. Furthermore, the appeal hearings before the PLUM Committee and the City Council provide an additional, noticed opportunity for the public to comment on the Project as revised. As such, all processes and procedures related to the Project were conducted in accordance with the LAMC and the City's notification procedures.

Appeal Point 17: Residents did not receive adequate and meaningful outreach for the Project.

The Appellants, Eugene Jones and Curtis Clark, claim that the neighboring residents did not receive adequate and meaningful outreach regarding important project characteristics, including the Project's proposed hours of operation and building height.

Staff Response:

While City Planning highly encourages Applicants to conduct public outreach efforts for all discretionary projects, the LAMC does not require Applicants to hold public outreach meetings with community groups and attend neighborhood council meetings; the required legal public notice is provided by the City.

Planning Staff complied with all noticing requirements per the LAMC, including a mailed hearing notice, newspaper publication, and on-site posting. A public hearing notice was mailed to all adjacent property owners, occupants, and owners within a 500-foot radius on April 16, 2026, for the Hearing Officer Hearing scheduled for May 12, 2026. In addition, a courtesy public hearing notice was mailed on July 26, 2026, for the CPC meeting on July 9, 2026. Both notices provided information on the Project's proposed hours of operation and building height.

Appeal Point 18: The CPC was not prepared and provided with all the technical information and studies needed to make an informed decision.

The Appellants, Eugene Jones and Curtis Clark, are concerned with regards to the CPC's preparation, the technical information available to the Commissioners, the studies supporting the Project, the asserted public benefits provided by the Project, and the representations made concerning material aspects of the development. The Appellants note that Commissioner Rosenstein raised questions regarding public benefit, that Commissioner Johnson indicated that studies had not been performed, that Commissioner Diaz raised questions regarding rooftop

solar, and that Commissioner Saitman raised questions regarding stormwater infiltration.

Staff Response:

Prior to the July 9, 2026 CPC meeting, Planning Staff submitted to the CPC for review a Staff Recommendation Report that includes all the prepared technical studies, reports, department letters, architectural plans, and the Project's MND. The Staff Recommendation Report in itself provides a project analysis, conditions of approval, entitlement findings, and information regarding public hearing and communications. Furthermore, all application materials, including the Staff Recommendation Report, are available for the general public to review. Therefore, the record demonstrates that the Commissioners were provided with the technical studies and reports necessary to make an informed decision.

The questions raised by individual Commissioners during the meeting, including questions regarding public benefit, rooftop solar, stormwater infiltration, and the supporting studies, reflect the CPC's deliberation on the Project rather than a lack of information. Following that deliberation, the CPC adopted findings supported by the record and approved the Project by a vote of 8–0. With respect to stormwater, the Project is required to comply with the City's Low Impact Development (LID) Ordinance and stormwater requirements, which are implemented through the Bureau of Sanitation and LADBS permitting processes, and the MND evaluated the Project's hydrology and water quality impacts

Appeal Point 20: The City did not adequately consider the Project's effects on, or meaningfully engage, the area's historically significant Black homeowner community.

The Appellants, Eugene Jones and Curtis Clark, contend that the Project is located adjacent to a neighborhood with a historically significant concentration of Black American homeowners and Black-owned real estate; that the Project may contribute to displacement and gentrification pressures, diminished property values, and other adverse effects; and that affected Black homeowners did not receive meaningful, timely, and equitable engagement consistent with the City Planning Commission's Racial Equity Value Statement. The Appellants request an independent investigation into the approval, the role of Council District 10, and the Applicant's representations, and request that implementation of the Project be suspended pending that review.

Staff Response:

Staff recognizes the history of discriminatory housing practices in Los Angeles described by the Appellants and the importance of the City's commitment to equitable planning processes, and has carefully considered these concerns.

The requested entitlements are governed by findings established in the LAMC and the City Charter. The CPC applied those findings to the Project based on its land use characteristics, physical design, and operations, and they apply in the same manner regardless of the demographic composition of the surrounding neighborhood. The CPC's Racial Equity Value Statement guides the Commission's processes and priorities, but it does not establish additional findings for individual entitlement decisions.

With respect to displacement, the Project site is currently developed with a one-story warehouse

and surface parking lots. The Project would not demolish any housing or displace any residents, and it does not involve the acquisition of any residential property. The nearest residential uses are located across San Vicente Boulevard, approximately 130 feet from the Project. Potential effects of the Project on neighboring residents, including height and scale, traffic and circulation, noise, construction, lighting, safety, and stormwater, were evaluated through the required entitlement findings and the MND, as discussed throughout this report. Under CEQA, effects on property values and other economic or social effects are not, by themselves, significant environmental effects (CEQA Guidelines Section 15131).

With respect to engagement, notice of the Hearing Officer hearing and the CPC meeting was provided by mail to owners and occupants within a 500-foot radius, by newspaper publication, and by on-site posting, and the Project was presented at two Neighborhood Council meetings. Neighborhood residents, including several of the Appellants, participated in the process by submitting written comments and a petition and by filing these appeals, and their concerns are now before the PLUM Committee and the City Council.

Conclusion

Per LAMC Section 13A.2.8.E.1, unless otherwise required by a specific process, the appellate body shall hear the matter de novo, considering the whole of the project with no deference given to the decision of the initial decision maker. The appellate body shall make its decision based on the record before the initial decision maker and any other evidence or testimony presented at or before the appellant body's hearing.

Based on the information in the record and after consideration of the Appellant's arguments for appeal, Staff recommends that the appeals of Case No. CPC-2025-5194-HD-CU2-PR-ZC be denied, and that the PLUM Committee sustain the decision by the CPC which found that, after consideration of the whole of the administrative record, including the Mitigated Negative Declaration, No. ENV-2025-5195-MND, and all comments received, with the imposition of mitigation measures, there is no substantial evidence that the Project will have a significant effect on the environment, and approve the entitlement requests. Therefore, it is recommended that the PLUM Committee deny the appeals and sustain the decision of the City Planning Commission.

Sincerely,

VINCENT P. BERTONI, AICP
Director of Planning



DAVID WOON
Planning Assistant

MZ:AR:EA:DW