

ORIGINAL



APPLICATIONS:

APPEAL APPLICATION

Instructions and Checklist

**Related Code Section:** Refer to the City Planning case determination to identify the Zone Code section for the entitlement and the appeal procedure.

**Purpose:** This application is for the appeal of Department of City Planning determinations authorized by the Los Angeles Municipal Code (LAMC).

A. APPELLATE BODY/CASE INFORMATION

1. APPELLATE BODY

- ☐ Area Planning Commission    ☐ City Planning Commission    ☒ City Council    ☐ Director of Planning  
☐ Zoning Administrator

Regarding Case Number: VTT No. 82654-1A

Project Address: 4629-4651 W. Maubert Ave.

Final Date to Appeal: 02/26/2021

2. APPELLANT

**Appellant Identity:**  
(check all that apply)

- ☐ Representative    ☐ Property Owner  
☐ Applicant    ☐ Operator of the Use/Site

☒ Person, other than the Applicant, Owner or Operator claiming to be aggrieved

☐ Person affected by the determination made by the **Department of Building and Safety**

- ☐ Representative    ☐ Owner    ☐ Aggrieved Party  
☐ Applicant    ☐ Operator

3. APPELLANT INFORMATION

Appellant's Name: Abraham Soghomonian

Company/Organization: Los Feliz Preservation Coalition

Mailing Address: P.O. Box 27516

City: Los Angeles    State: California    Zip: 90027

Telephone: (323) 661-8765    E-mail: \_\_\_\_\_

a. Is the appeal being filed on your behalf or on behalf of another party, organization or company?

- ☐ Self    ☒ Other: Joint appeal: Los Feliz Preservation Coalition  
Responsible Urban Development Initiative

b. Is the appeal being filed to support the original applicant's position?    ☐ Yes    ☒ No

#### 4. REPRESENTATIVE/AGENT INFORMATION

Representative/Agent name (if applicable): \_\_\_\_\_

Company: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Telephone: \_\_\_\_\_ E-mail: \_\_\_\_\_

#### 5. JUSTIFICATION/REASON FOR APPEAL

a. Is the entire decision, or only parts of it being appealed? ☒ Entire ☐ Part

b. Are specific conditions of approval being appealed? ☐ Yes ☒ No

If Yes, list the condition number(s) here: \_\_\_\_\_

Attach a separate sheet providing your reasons for the appeal. Your reason must state:

- ☐ The reason for the appeal ☐ How you are aggrieved by the decision  
☐ Specifically the points at issue ☐ Why you believe the decision-maker erred or abused their discretion

#### 6. APPLICANT'S AFFIDAVIT

I certify that the statements contained in this application are complete and true:

Appellant Signature: Abraham G. [Signature] Date: 2/23/2021

#### GENERAL APPEAL FILING REQUIREMENTS

#### B. ALL CASES REQUIRE THE FOLLOWING ITEMS - SEE THE ADDITIONAL INSTRUCTIONS FOR SPECIFIC CASE TYPES

##### 1. Appeal Documents

a. **Three (3) sets** - The following documents are required for each appeal filed (1 original and 2 duplicates)  
Each case being appealed is required to provide three (3) sets of the listed documents.

- ☐ Appeal Application (form CP-7769)  
☐ Justification/Reason for Appeal  
☐ Copies of Original Determination Letter

##### b. Electronic Copy

- ☐ Provide an electronic copy of your appeal documents on a flash drive (planning staff will upload materials during filing and return the flash drive to you) or a CD (which will remain in the file). The following items must be saved as individual PDFs and labeled accordingly (e.g. "Appeal Form.pdf", "Justification/Reason Statement.pdf", or "Original Determination Letter.pdf" etc.). No file should exceed 9.8 MB in size.

##### c. Appeal Fee

- ☐ Original Applicant - A fee equal to 85% of the original application fee, provide a copy of the original application receipt(s) to calculate the fee per LAMC Section 19.01B 1.  
☐ Aggrieved Party - The fee charged shall be in accordance with the LAMC Section 19.01B 1.

##### d. Notice Requirement

- ☐ Mailing List - All appeals require noticing per the applicable LAMC section(s). Original Applicants must provide noticing per the LAMC  
☐ Mailing Fee - The appeal notice mailing fee is paid by the project applicant, payment is made to the City Planning's mailing contractor (BTC), a copy of the receipt must be submitted as proof of payment.

**SPECIFIC CASE TYPES - APPEAL FILING INFORMATION**

**C. DENSITY BONUS / TRANSIT ORIENTED COMMUNITES (TOC)**

**1. Density Bonus/TOC**

Appeal procedures for Density Bonus/TOC per LAMC Section 12.22.A 25 (g) f.

**NOTE:**

- Density Bonus/TOC cases, only the *on menu or additional incentives* items can be appealed.
- Appeals of Density Bonus/TOC cases can only be filed by adjacent owners or tenants (must have documentation), and always only appealable to the Citywide Planning Commission.
- ☐ Provide documentation to confirm adjacent owner or tenant status, i.e., a lease agreement, rent receipt, utility bill, property tax bill, ZIMAS, drivers license, bill statement etc.

**D. WAIVER OF DEDICATION AND OR IMPROVEMENT**

Appeal procedure for Waiver of Dedication or Improvement per LAMC Section 12.37 I.

**NOTE:**

- Waivers for By-Right Projects, can only be appealed by the owner.
- When a Waiver is on appeal and is part of a master land use application request or subdivider's statement for a project, the applicant may appeal pursuant to the procedures that governs the entitlement.

**E. TENTATIVE TRACT/VESTING**

**1. Tentative Tract/Vesting** - Appeal procedure for Tentative Tract / Vesting application per LAMC Section 17.54 A.

NOTE: Appeals to the City Council from a determination on a Tentative Tract (TT or VTT) by the Area or City Planning Commission must be filed within 10 days of the date of the written determination of said Commission.

- ☐ Provide a copy of the written determination letter from Commission.

**F. BUILDING AND SAFETY DETERMINATION**

- ☐ **1. Appeal of the Department of Building and Safety determination, per LAMC 12.26 K 1, an appellant is considered the **Original Applicant** and must provide noticing and pay mailing fees.**

**a. Appeal Fee**

- ☐ Original Applicant - The fee charged shall be in accordance with LAMC Section 19.01B 2, as stated in the Building and Safety determination letter, plus all surcharges. (the fee specified in Table 4-A, Section 98.0403.2 of the City of Los Angeles Building Code)

**b. Notice Requirement**

- ☐ Mailing Fee - The applicant must pay mailing fees to City Planning's mailing contractor (BTC) and submit a copy of receipt as proof of payment.

- ☐ **2. Appeal of the Director of City Planning determination per LAMC Section 12.26 K 6, an applicant or any other aggrieved person may file an appeal, and is appealable to the Area Planning Commission or Citywide Planning Commission as noted in the determination.**

**a. Appeal Fee**

- ☐ Original Applicant - The fee charged shall be in accordance with the LAMC Section 19.01 B 1 a.

**b. Notice Requirement**

- ☐ Mailing List - The appeal notification requirements per LAMC Section 12.26 K 7 apply.
- ☐ Mailing Fees - The appeal notice mailing fee is made to City Planning's mailing contractor (BTC), a copy of receipt must be submitted as proof of payment.

## G. NUISANCE ABATEMENT

### 1. Nuisance Abatement - Appeal procedure for Nuisance Abatement per LAMC Section 12.27.1 C 4

#### NOTE:

- Nuisance Abatement is only appealable to the City Council.

#### a. Appeal Fee

- ☐ Aggrieved Party the fee charged shall be in accordance with the LAMC Section 19.01 B 1.

### 2. Plan Approval/Compliance Review

Appeal procedure for Nuisance Abatement Plan Approval/Compliance Review per LAMC Section 12.27.1 C 4.

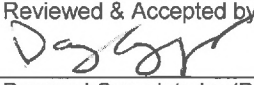
#### a. Appeal Fee

- ☐ Compliance Review - The fee charged shall be in accordance with the LAMC Section 19.01 B.
- ☐ Modification - The fee shall be in accordance with the LAMC Section 19.01 B.

## NOTES

*A Certified Neighborhood Council (CNC) or a person identified as a member of a CNC or as representing the CNC may not file an appeal on behalf of the Neighborhood Council; persons affiliated with a CNC may only file as an individual on behalf of self.*

*Please note that the appellate body must act on your appeal within a time period specified in the Section(s) of the Los Angeles Municipal Code (LAMC) pertaining to the type of appeal being filed. The Department of City Planning will make its best efforts to have appeals scheduled prior to the appellate body's last day to act in order to provide due process to the appellant. If the appellate body is unable to come to a consensus or is unable to hear and consider the appeal prior to the last day to act, the appeal is automatically deemed denied, and the original decision will stand. The last day to act as defined in the LAMC may only be extended if formally agreed upon by the applicant.*

This Section for City Planning Staff Use Only		
Base Fee: \$89	Reviewed & Accepted by (DSC Planner): 	Date: 2/24/2021
Receipt No: 2021055003-17	Deemed Complete by (Project Planner):	Date:
<input type="checkbox"/> Determination authority notified		<input type="checkbox"/> Original receipt and BTC receipt (if original applicant)



February 22, 2020

The Los Feliz Preservation Coalition  
P.O. Box 27516  
Los Angeles, California 90027

The Responsible Urban Development Initiative  
3924 W. Sunset Blvd.  
Los Angeles, CA 90029

Los Angeles City Council,  
Planning and Land Use Management Committee  
c/o Los Angeles City Clerk  
200 N. Spring St., Room 360  
Los Angeles, CA 90012

**Joint Appeal of:**      **Vesting Tentative Tract Map for Case No.: VTT No. 82654-1A;**  
**Project Addresses: 4629-4651 W. Maubert Ave.**

Chair Harris-Dawson and Honorable PLUM Committee members:

The City Planning Commission paid no attention whatsoever to the merits of our appeal and the concerns of our community during its January 14, 2021 hearing on the 4629 Maubert Ave. project, a proposed 153-unit, 108-foot-tall apartment complex that is completely at odds with the limitations imposed on the site by the Hollywood Community Plan, the Vermont/Western Specific Plan, and good zoning practices. Instead, commission members were dismissive of speaker objections, ignored factual evidence, and lent no concern to the criminal relationship between the applicant, Carmel Partners, and the bribery corruption scandal enveloping City Hall.

The fact that the City Planning Commission embraced a developer charged in a federal racketeering indictment over the Los Feliz community and impacted, surrounding residents is, sadly, par for the course for a planning department with a nearly 100% track record of approving every project that comes before it. Hopefully, however, members of the city council will side with the community in this matter over felons, and overturn the Deputy Advisory Agency's August 5, 2020 approval of a Vesting Tentative Tract Map for Carmel Partners for the merger and subdivision of five lots located at 4629-4651 Maubert Avenue into one lot.

Approval of the Vesting Tentative Tract Map must be reversed due to General Plan and Specific Plan inconsistency. California Government Code Sections 66474.61(a) and (b) provide that the City "*shall deny approval of a tentative map*" if the proposed map or the proposed improvement of the proposed subdivision is not consistent with the general plan or specific plan. The subject project is within the Vermont/Western Transit Oriented District Specific Plan and the Hollywood Community Plan. The proposed improvement is inconsistent with the limitations of both plans and direction for this property, despite planning staff's cherry picking of quotes from both plans in an attempt to support it.

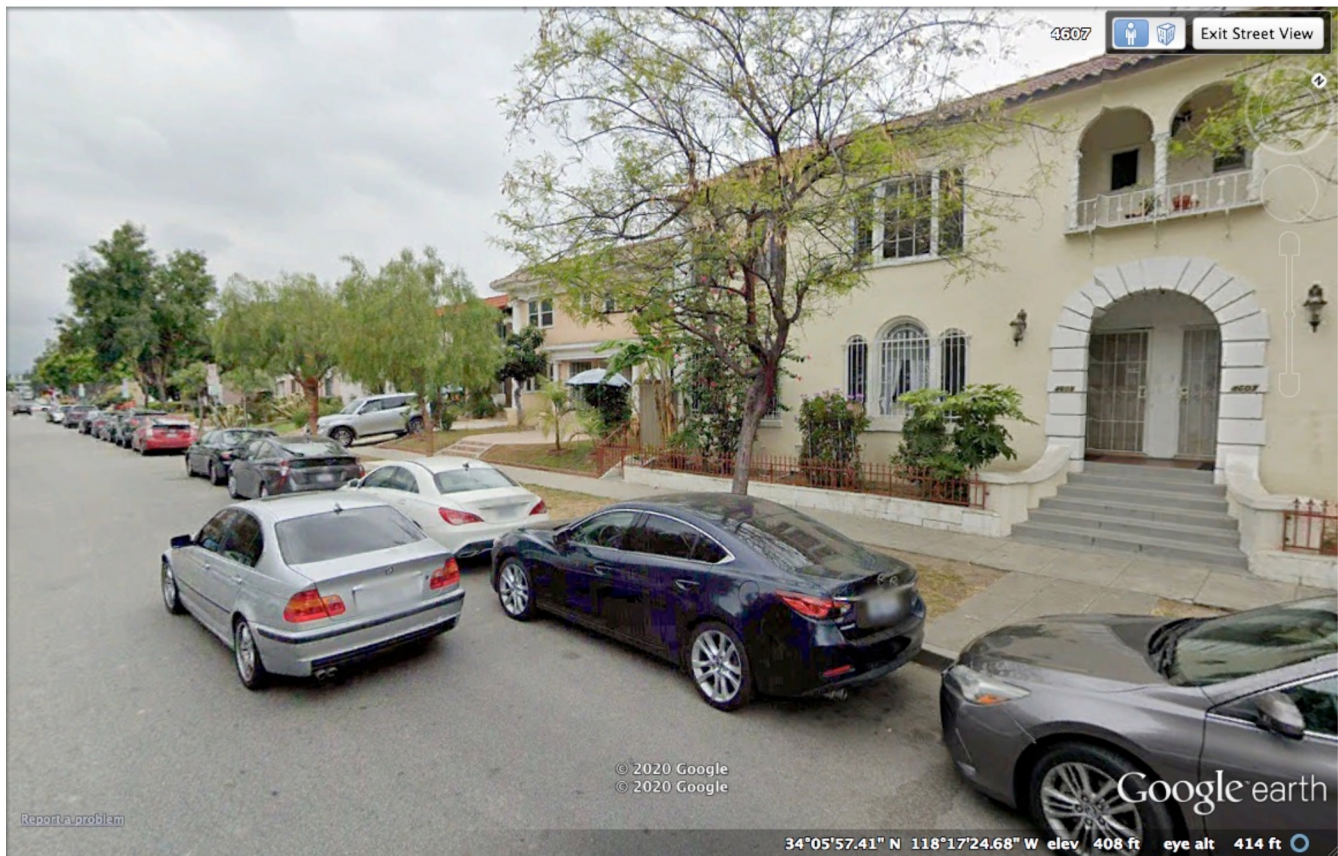


Photo above: 4600 block of Maubert Ave.



Photo above: Project site.





Rendering above of Carmel Partner's proposed 153-unit, 108-foot-tall apartment building.

The proposed project involves the demolition of three 1920, 2-story quadplexes consisting of 14 rent-controlled residential units on five separate lots totaling 33,053 sq. ft. The applicant, Carmel Partners, proposes the construction of a 153-unit, 8-story apartment building that would rise up to 108 feet tall, with 143,785 sq. ft. of floor area and no required parking. The project is in the R4-1 Zone and Subarea C of the Vermont/Western Transit Oriented District Specific Plan. Seventeen units would be reserved for low income housing, **which are only three more than currently exist**, in exchange for the following incentives:

- A) An 80% increase in the allowed density (from 85 units to 153 units);
- B) A decrease in required parking from a maximum of 333 required stalls to no stalls;
- C) A 33-foot increase in the maximum permitted building height, from 75 feet to 108 feet;
- D) A 25% reduction in the required open space, from 18,025 sq. ft. to 13,519 sq. ft.
- E) A 45% increase in the permitted Floor Area Ratio from 3.0:1 to 4.35:1.

The Project as approved by the Advisory Agency has no relationship to either the intent or purpose of the Specific Plan, or the findings inherent to the California Subdivision Map Act. Instead, the Advisory Agency granted full rights to a project with severe and precedent setting deviations from both the requirements of the Los Angeles Municipal Code ("LAMC"), the Hollywood Community Plan and the Specific Plan (also known as "SNAP," or Station Neighborhood Area Plan). The Advisory Agency abused its discretion by approving this Project, and the City Planning Commission failed to exercise its due diligence in reviewing it.

**A. The proposed Project is inconsistent with the Goals, Policies and Objectives of the Hollywood Community Plan and the Vermont/Western Transit Oriented District Specific Plan**

The proposed development would consist of a 153-unit, eight-story apartment building located in SNAP Subarea C, with no required parking, a Floor Area Ratio (FAR) of 4.35:1, and a potential height of 108 feet. Per the underlying zoning of R4, only 85 units are permitted in the R4 Zone, while up to 333 parking stalls would be required. The FAR is limited to 3:1.

When analyzing this case, it is important to remember that community plans like the SNAP represent the hard-fought compromise of competing interests. In this way, specific plans are like contracts upon which those competing interests rely when making decisions concerning their property in relation to other stakeholders in the community. While one stakeholder may desire increased density or height, another may be passionately committed to preserving the existing character of her neighborhood. Accordingly, when a developer and the City collaborate to single out one project for special privileges at the expense of others, they undermine the balance embodied in the Plan. This is why the law requires detailed and specific findings to support deviations to specific plans. Yet none of that has been done here. Instead, cherry-picked quotes were used to deny the obvious – that this project is incompatible with its surroundings.

As noted by the California Supreme Court, “A zoning scheme, after all, is similar in some respects to a contract; each party foregoes rights to use its land as it wishes in return for the assurance that the neighboring property will be similarly restricted, the rationale being that such mutual restriction can enhance total community welfare.” Topanga Association for a Scenic Community v. County of Los Angeles (1974) 11 Cal.3d 506, 517

**B. The proposed map is inconsistent with the applicable general and specific plans, and the site is not physically suitable for the proposed density of development.**

The Advisory Agency abused its discretion by approving a Map that has no relationship whatsoever to the site’s existing permitted zoning. The purpose of the California Subdivision Map Act of 1974 is to vest a city with the power to regulate and control the design and improvement of land subdivisions in conformance with the requirements of Government Code Sections 66410 – 66499.58. The primary goals of the Map Act are to encourage orderly subdivision development with proper consideration to its relationship with the adjoining community; to ensure that areas dedicated for public purposes will be properly improved; and to protect the public from fraud and exploitation. None of that is achieved here.

As approved by the Advisory Agency, the Project is inconsistent with the stated objectives of the General Plan, the Hollywood Community Plan, and the Vermont/Western Transit Oriented District Specific Plan. Community Plans and Specific Plans are mandated by the State and must be considered within the planning hierarchy as such.

The applicant seeks to construct 153 dwelling units, an 80% increase over the allowed base density, and a density of one unit per approximately 216 sq. ft. of lot area, which is a density equivalent to the R5 Zone. A density of R5 is permitted only in the Regional Center Commercial area of the Hollywood Community Plan, which is the area on Hollywood Blvd. and Sunset Blvd. between La Brea Ave. to the west and Gower St. to the east. The proposed project’s density is incompatible with the regulations governing the SNAP.

Note the below chart outlining the permitted zoning and the requested entitlements:

<b>Project</b>	<b>Permitted</b>	<b>Approved</b>
<b>Density</b>	85 dwelling units	153 dwelling units, an 80% increase.
<b>FAR</b>	3:1	4.35:1 over entire site
<b>Open Space</b>	17,025 sq. ft. required	12,769 sq. ft.
<b>Height</b>	75 feet (Planning says SNAP is silent on height, which is disputed)	108 feet
<b>Parking, including guest parking</b>	218 (minimum required) 333 (maximum allowed)	No required parking. Carmel Partners proposes 84 unbundled stalls in a ground-level parking podium.

The proposed Project is not consistent with SNAP's goals, objectives and policies as it proposes a regional center density project in a location where it is not allowed.

<b>Land Use Designation</b>	<b>Corresponding Zones</b>	<b>Density Per Net Acre</b>
<b>Low Medium I RD</b>	RD3, RD4, RZ2.5, RZ3, RZ4, RU	10-17
<b>Low Medium II</b>	RW1, RD1.5, RD2	18-29
<b>Medium</b>	R3	30-55
<b>High Medium</b>	R4, [Q]R4	56-109
<b>High</b>	R5, [Q]R5	110-218

The Project as proposed is not in conformance with the above table, which provides guidance for appropriate densities in different zoning classifications. The Project is located within the R4 Zone, which permits a maximum density of one unit per 400 sq. ft. of lot area. The proposed density of 153 dwelling units calculates to 197 dwelling units per acre, or R5. The site is therefore not suitable for the proposed density.

Section 2 of the SNAP states under Purpose F that the Specific Plan “*is intended to preserve the quality of existing residential neighborhoods by limiting new residential development which would exceed the prevailing density of such neighborhoods, and establish standards for new construction in such neighborhoods to conform to the existing neighborhood character.*”

A Regional Center project does not maintain the existing neighborhood character. In order to achieve the Regional Center density and receive other entitlements, the city approved the project as a Transit Oriented Communities (TOC) development. As noted below, however, TOC projects are illegal and therefore cannot be used as the basis for such significant changes to the underlying zoning restrictions.

**C. The Transit Oriented Communities Guidelines are illegal and therefore cannot be used as the basis for approving a Vesting Tentative Tract Map.**

On November 8, 2016, voters in the City of Los Angeles approved a ballot measure known as Measure JJJ. The title of this measure was "*Affordable Housing and Labor Standards Related to City Planning*." The measure was further titled "The Build Better LA Initiative." As the ballot titles reveal, Measure JJJ was drafted to promote two purposes: 1) an increase in the amount of affordable housing constructed in the City, and 2) the creation of local jobs paying adequate wages.

The ballot question for Measure JJJ read: "Shall an ordinance: 1) requiring that certain residential development projects provide for affordable housing and comply with prevailing wage, local hiring and other labor standards; 2) requiring the City to assess the impacts of community plan changes on affordable housing and local jobs; 3) creating an affordable housing incentive program for developments near major transit stops; and 4) making other changes; be adopted?"

The City's Chief Legislative Analysis prepared an Impartial Analysis of Measure JJJ, which provided that Measure JJJ "*will amend City law to add affordable housing standards and training, local hiring, and specific wage requirements for certain residential projects or more units seeking General Plan amendments or zoning changes.*" The Impartial Analysis explained "*This measure also creates an affordable housing incentive program with increased density and reduced parking requirements in areas within a one-half mile radius around a major transit stop.*"

On September 27, 2017 the City Planning Commission released the draft TOC Guidelines "*developed pursuant to Measure JJJ.*" These TOC Guidelines were clarified and updated on February 25, 2018. The TOC Guidelines contend that they "*provide the eligibility standards, incentives, and other necessary components of the TOC Program consistent with LAMC §12.22 A.31 [enacted by Measure JJJ].*"

Yet the Commission and City far exceeded the authority granted it by the voters as well as its own laws and state laws. TOC "incentives" far exceed those authorized by the voters enacting Measure JJJ, while failing to provide for well-paid jobs adhering to the prevailing wage in Los Angeles. These incentives constitute vast departures from numerous existing codified ordinances yet were never approved legislatively: not by the voters, nor by the City Council.

The reliance upon these improper guidelines by the City and the City Planning Commission constitutes an improper policy and practice of ignoring the voters' mandate in Measure JJJ and disregarding the proper legislative procedures for amending the General Plan and zoning ordinances. They therefore have no force of law. In fact, the TOC Guidelines depart significantly from the parameters and requirements of Measure JJJ in numerous respects. While Measure JJJ provides that the TOC Guidelines may allow a different level of density increase based upon a property's base zone and density, the TOC Guidelines utilize a system of Tiers based upon distance from a Major Transit Stop to award differing levels of density increase, regardless of a property's base zone or density. Measure JJJ merely provides that the TOC Guidelines contain incentives "*consistent with the following*": a residential density increase, adjustments to minimum square feet per dwelling unit, floor area ratio, or both, as well as parking reductions.

The TOC Guidelines also include additional, non-voter approved incentives for reductions in required yards and setback, open space, lot width, increases in maximum lot coverage, height, transitional height requirements, and FAR starting levels irrespective of the underlying zoning. Each of these "additional" incentives alters otherwise applicable limitations in the municipal code without complying with the procedural requirements for zone changes, height district amendments and general plan amendments or variances, all of which provide due process and full transparency.

Section 5 of Measure JJJ provides that in the case of projects with 10 or more residential dwelling units, in order to be eligible for *"a discretionary General Plan amendment... or any zone change or height-district change that results in increased allowable residential floor area, density or height, or allows a residential use where previously not allowed,"* the project must comply with various affordable housing requirements (including on- or off-site), and shall comply with the job standards in subdivision (i). The job standards require that all work be performed by licensed contractors, that at least 30 percent of the workforce are residents of the City, that 10 percent of the workforce consists of "transitional" workers living within a 5-mile radius of the project, and that the workers are paid the standard prevailing wages in the project area.

Yet despite TOC projects now comprising the overwhelming majority of discretionary building applications, there have been almost no labor standard projects approved under Measure JJJ.

Voters adopted Measure JJJ being told that the measure would require projects seeking zone changes or height district changes to abide by labor standards and affordable housing requirements. What voters got instead are guidelines that provide wholesale elimination of established zoning laws for a pittance of affordable housing while destroying whole swaths of Rent Stabilized housing. The TOC Guidelines were never adopted in a legislative process or presented to the voters, and do not require the "good jobs" that Measure JJJ promised. Projects that would have been required to meet labor standards under Section 5 avoid those standards because the TOC Guidelines claim to obviate the need for zone changes and height district changes in the many areas of the city that are within a half mile from a bus line or transit stop.

The TOC Guidelines are quite simply a scam. They overturn a significant number of municipal code provisions regarding height and other planning standards, yet they were never adopted by the legislative body legally authorized to make those changes. Nor were the TOC Guidelines adopted by the voters. Instead, the TOC Guidelines significantly depart from the land use planning framework approved by the voters and overturn the duly-adopted ordinances passed by the Los Angeles City Council. Nor were the TOC "Tiers" allowing increased density within proximity to transit authorized by Measure JJJ. The Tiers function as newly created zones, which were not adopted by ordinance nor approved by voters. Only the voters can amend Measure JJJ; the Council may only make non-substantive amendments to the measure's provisions.

The TOC Guidelines are so sweeping they effectively constitute a general plan amendment, vastly increasing permissible density and height for certain residential projects. Yet the TOC Guidelines were not adopted consistent with the process for a general plan amendment.



Further, by impermissibly including height and other incentives not provided for in Measure JJJ, the city has effectively rendered moot the general plan amendment process, thereby creating inconsistencies within the general plan in violation of state law. The TOC Guidelines undermine one of the two fundamental premises of Measure JJJ: the requirement of projects to meet labor standard requirements to receive incentives under the TOC Guidelines. Absent this requirement, the fundamental promise of Measure JJJ to provide "good jobs" is undermined.

While Measure JJJ Section 5 sets forth an elaborate set of requirements for projects seeking general plan amendments, zone changes, or height district changes, and requires adherence to labor standards in order to receive these entitlements, projects receiving incentives under the improperly approved TOC Guidelines no longer need zone changes or height district changes, and so do not comply with the labor standards or provide the public with notice and public hearings to make these massive changes. The TOC guidelines as written and illegally "approved" is nothing short of an attempt to end-run the City Charter and the will of the voters.

In adopting the TOC Guidelines in conflict with JJJ, the Planning Department and City Planning Commission abused their discretion, and promulgated TOC Guidelines in an arbitrary and capricious manner that is not consistent with the requirements of Measure JJJ nor consistent with the requirements of state and local law for the adoption of zoning ordinances and maintaining general plan consistency. As such, any approval by the city is therefore illegal and has no relevance in law, and cannot be employed as a conceit to approve the tentative tract map.

**D. The design of the subdivision will likely cause serious public health problems.**

The project site is immediately across from the Children's Hospital's daycare and playground facilities, and less than 10 feet from adjacent residential housing. Both construction and operational traffic, noise and vibration impacts will likely significantly effect the health of children and others in such immediate proximity to the project. The applicant has offered no plausible mitigation to negate these effects, despite self-serving additional material submitted by their consultants.

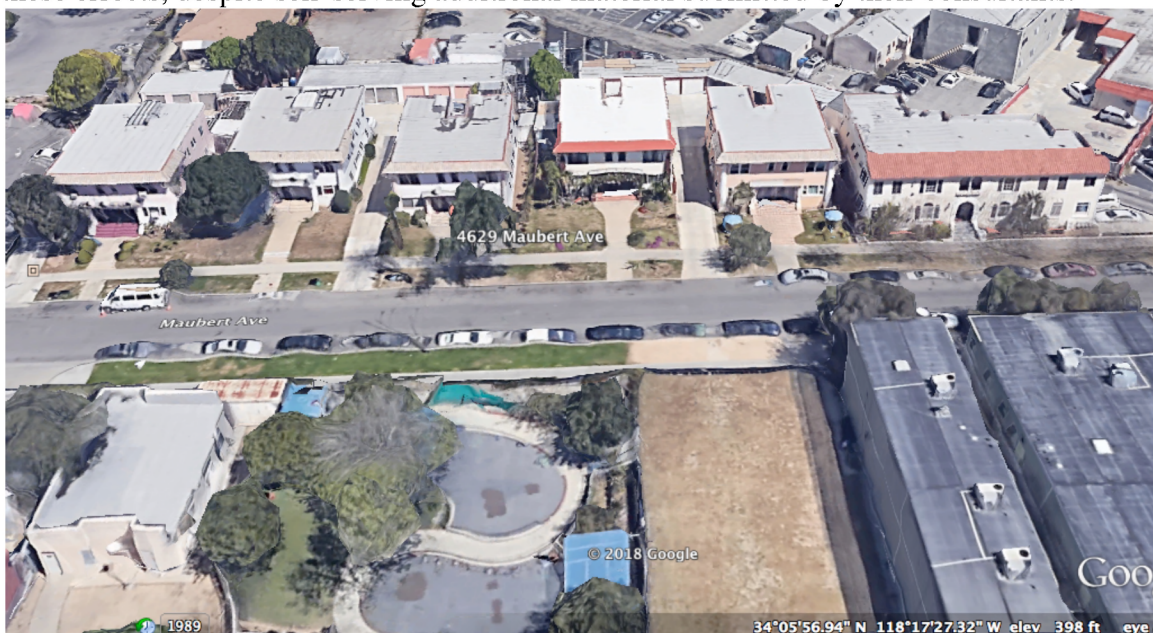




Photo above: Children's Hospital daycare playground located directly across from project site.

#### **E. Conclusion**

The Project as proposed would create a myriad of significant adverse impacts upon this community. It is respectfully submitted that in its current form, the Advisory Agency's approval of the Vesting Tentative Tract Map should be overturned and the Project in its current form should not be approved.

*"Before one brings about a potentially significant and irreversible change to the environment, an EIR must be prepared that sufficiently explores the significant environmental effects created by the project."* Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners (2001) 91 Cal.App.4<sup>th</sup> 1344, 1371. "Because the EIR must be certified or rejected by public officials, it is a document of accountability. If CEQA is scrupulously followed, the public will know the basis on which its responsible officials either approve or reject environmentally significant action, and the public, being duly informed, can respond accordingly to action with which it disagrees." Cadiz Land Co., Inc. v. Rail Cycle, L.P. (2000) 83 Cal.App.4<sup>th</sup> 74, 84.

Thank you for your time and consideration of this matter.

*Abraham Sghomonian*

Abraham Sghomonian, for The Los Feliz Preservation Coalition



**Applicant Copy**  
Office: Van Nuys  
Application Invoice No: 70396

City of Los Angeles  
Department of City Planning



Scan this QR Code® with a barcode reading app on your Smartphone. Bookmark page for future reference.



## City Planning Request

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

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

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

**Receipt Number: 2021055003-17, Amount: \$109.47, Paid Date: 02/24/2021**

Applicant: LOS FELIZ PRESERVATION - SOGHOMONIAN, ABRAHAM
Representative:
Project Address: 4629 W MAUBERT AVE, 90027

**NOTES:**

VTT-82654-2A			
Item	Fee	%	Charged Fee
Appeal by Aggrieved Parties Other than the Original Applicant *	\$89.00	100%	\$89.00
<b>Case Total</b>			<b>\$89.00</b>

Item	Charged Fee
*Fees Subject to Surcharges	\$89.00
Fees Not Subject to Surcharges	\$0.00
<b>Plan &amp; Land Use Fees Total</b>	<b>\$89.00</b>
<b>Expediting Fee</b>	<b>\$0.00</b>
<b>Development Services Center Surcharge (3%)</b>	<b>\$2.67</b>
<b>City Planning Systems Development Surcharge (6%)</b>	<b>\$5.34</b>
<b>Operating Surcharge (7%)</b>	<b>\$6.23</b>
<b>General Plan Maintenance Surcharge (7%)</b>	<b>\$6.23</b>
<b>Grand Total</b>	<b>\$109.47</b>
<b>Total Invoice</b>	<b>\$109.47</b>
<b>Total Overpayment Amount</b>	<b>\$0.00</b>
<b>Total Paid</b> (this amount must equal the sum of all checks)	<b>\$109.47</b>

Council District: 13  
Plan Area: Hollywood  
Processed by NGUYEN, DANG on 02/24/2021

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



Scan this QR Code® with a barcode reading app on your Smartphone. Bookmark page for future reference.



## City Planning Request

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Receipt Number:2021055003-17, Amount:\$109.47, Paid Date:02/24/2021

Applicant: LOS FELIZ PRESERVATION - SOGHOMONIAN, ABRAHAM
Representative:
Project Address: 4629 W MAUBERT AVE, 90027

### NOTES:

VTT-82654-2A			
Item	Fee	%	Charged Fee
Appeal by Aggrieved Parties Other than the Original Applicant *	\$89.00	100%	\$89.00
Case Total			\$89.00

Item	Charged Fee
*Fees Subject to Surcharges	\$89.00
Fees Not Subject to Surcharges	\$0.00
Plan & Land Use Fees Total	\$89.00
Expediting Fee	\$0.00
Development Services Center Surcharge (3%)	\$2.67
City Planning Systems Development Surcharge (6%)	\$5.34
Operating Surcharge (7%)	\$6.23
General Plan Maintenance Surcharge (7%)	\$6.23
Grand Total	\$109.47
Total Invoice	\$109.47
Total Overpayment Amount	\$0.00
Total Paid (this amount must equal the sum of all checks)	\$109.47

Council District: 13  
Plan Area: Hollywood  
Processed by NGUYEN, DANG on 02/24/2021

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