

Communication from Public

Name: Alison Block
Date Submitted: 09/17/2021 03:39 PM
Council File No: 21-0646
Comments for Public Posting: Supplemental Attachment to Appeal Application, stating additional written objections to proposed project

Re: Case No. CPC-2020-595-DB-CU - 1432-1434 S. Beverly Drive

From: Alison Block (ablock811@yahoo.com)

To: heather.bleemers@lacity.org

Cc: alexander.truong@lacity.org; cecilia.lamas@lacity.org; lisa.webber@lacity.org; oliver.netburn@lacity.org; dperلمان@perlmanlaw.com; cpc@lacity.org

Date: Tuesday, June 1, 2021, 12:44 PM PDT

Hi, Heather.

In advance of our teleconference today, I want to outline some of the questions/issues that I want to discuss. My first set of questions involve procedural issues related to my appeal. My other questions concern the merits of the second "corrected" letter of determination that was approved on May 18, after I filed my appeal on May 12.

Below are my primary questions pertaining to the procedural aspects of my appeal:

1. On May 12, I filed an appeal based on the April 27 corrected letter of determination for case CPC-2020-595-DB-CU. A related case was opened for case # CPC-2020-595-DB-CU-1A. Is the 1A case my appeal or is that a new case related to the project?
2. If the 1A case is my appeal, why does the case file not include my appeal documents? The case documents for the 1A case contain only the CPC's letters of determination, not my appeal. Why is that?
3. What is the status of my May 12 appeal given that a second "corrected" letter of determination was signed on May 18. Does my May 12 appeal cover the second corrected decision, or am I required to file a new appeal and pay another \$112 filing fee because a new "corrected" decision was filed after I appealed?
4. If my previously submitted appeal is still good, can I amend or supplement it to address other problems presented by the second corrected decision, for example, the improper approval of a 3.65 to 1 Floor Area Ratio. If I can amend or supplement, what is the procedure, and do I have to pay another filing fee?
5. How will I be notified about the appeal? Am I required to submit a written request for notification, and how many days before the appeal date will I be notified?
6. Will I have the opportunity to submit additional documents in advance of the Commission's consideration of my appeal? Likewise, will all of the other aggrieved community stakeholders be allowed to submit documents in support of my appeal, and in opposition to the proposed project?
7. How much time will I have to speak at the appeal, and how much time will other community stakeholders have to speak at the appeal? The developer's representative has had a lot of time to speak, but the Commission imposes strict time limits on community stakeholders that oppose the project.
8. According to the second letter of determination, I have a 90-day time period for filing a petition of writ of mandate. Does the 90-day time period run from the date of the second "corrected" decision, or does the time for requesting judicial review begin on the date that the Commission decides my appeal?
9. Does my appeal cover the other tenants in my building, who also oppose the proposed project, or are they required separately appeal and pay additional filing fees?
10. How do I make a public records request to obtain emails and other documents in the possession of DCP and CPC regarding the proposed project?

With respect to the substance of the second "corrected" decision, I want to discuss the legal issues raised in my appeal application, a copy of which is attached. I also want to discuss the portion of the decision "approving" an increased Floor Area Ratio of 3.65 to 1. Under L.A. Municipal Code Section 12.22-A.25(e)(4), a Floor Area Ratio "incentive" may be approved (1) only if the project is located within 1500 feet of a transit center, meaning a "TOC" project, which everyone agrees the proposed project is not TOC, and (2) only if the ratio does not exceed 3 to 1. A Floor Area Ratio of 3.65 to 1 for a non-TOC project is not allowed. When and how did the Commission approve a 3.65 to 1 Floor Area Ratio in a non-TOC situation in excess of the express limitation stated in the L.A. Municipal Code?

Finally, I want to note that, despite the "clarification" motion that was made on May 13, which was NOT on the agenda for the May 13 meeting and which occurred AFTER I submitted my appeal and without notice to me, the Minutes of the February 25

meeting do not accurately reflect what actually occurred during the meeting. During the January 28 and February 25 meetings, Commissioner Perlman stated that the proposed project was being considered only for approval as a conditional use permit because the requested incentives were "excessive" and did not comply with the rules for "Affordable Housing Incentives" under L.A. Municipal Code Section 12.22-A.25. Commissioner Perlman also stated, "On the density bonus, I won't even go into that, but I'm going to go into the CUP." (The CUP request was rejected.) Commissioner Perlman also stated that "the issues with height and the lack of guest parking ... are not compatible with the area, they will adversely impact the area, and for those reasons I cannot support this project." With respect to DCP's proposed Conditions of Use and Findings, Commissioner Perlman moved to "DENY staff recommendations" and stated, specifically, that the proposed project "will adversely effect or further degrade adjacent properties in the surrounding neighborhood." Yet, the "approved" Findings state that the project will not adversely impact the neighborhood. That's not true or accurate. And the "clarification" of minutes to reflect a motion that was never made or considered seems improper, especially when no motion to "clarify" or approve the February 25 Minutes was on the agenda. The only minutes noticed on the May 13 agenda for discussion were the minutes from April 22, not February 25.

Thank you, and I look forward to speaking with you at 1:30 pm today.

Alison
(310) 617-5700
(424) 274-3987

On Thursday, May 27, 2021, 1:36:45 PM PDT, Heather Bleemers <heather.bleemers@lacity.org> wrote:

Hi Alison,

Thank you for your email. I am happy to discuss this further and will send out a calendar invite for June 1st.

Talk to you soon.

Best,

Heather

Heather Bleemers
Senior City Planner
Preferred Pronouns: She, Hers, Her
Los Angeles City Planning
221 N. Figueroa St., Suite 1350
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1322

On Thu, May 27, 2021 at 1:23 PM Alison Block <ablock811@yahoo.com> wrote:

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> Hi, Heather.
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> I appreciate you reaching out to me. I have been attempting to follow this matter, but have not received notice of any of the changes to the Commission's initial decision to reject the proposed project. As you know, I filed an appeal of the Commission's "corrected" decision, and the next day, without notice to anyone, the Commission passed a new motion with respect to the project, resulting in a second "corrected" decision. The new appeal date is Wednesday, June 2. If you have time on Tuesday, June 1, I will appreciate speaking with you anytime after 10am. Please let me know what time works for you.
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> Thank you and have a great day!
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> Alison
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> On Thursday, May 27, 2021, 8:57:48 AM PDT, Heather Bleemers <heather.bleemers@lacity.org> wrote:
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> Good morning, Alison,
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> I understand that you have concerns with the appeal notification of this case. I would be happy to schedule a call to discuss this with you. Can you please provide some dates/times that are convenient for you?
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> Best,
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> Heather Bleemers
> Senior City Planner
> Preferred Pronouns: She, Hers, Her
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> On Thu, May 6, 2021 at 8:41 AM Alison Block <ablock811@yahoo.com> wrote:
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>> Mr. Troung:
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>> For convenience and ease of reference, I have attached a PDF copy of this email so that you may print my email for easy reference and review.
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>> I am writing in response to your email dated May 2, 2021 regarding the CPC's "approval" of a proposed project for demolishing an existing duplex and constructing a massive 6-story, 67' tall, multi-unit apartment building at 1432-1434 S. Beverly Drive, in the Pico-Beverlywood area of Los Angeles. With all due respect, the CPC voted unanimously to reject the proposed project, not to approve it entirely. Yet, the practical effect of the CPC's "Corrected" Letter of Determination dated 4/27/2021 is to approve the application with every one of the excessive items that the Commission refused to accept. The Corrected letter states (incorrectly) that the Commission "approved" every item requested by the applicant, including (i) an excessive density bonus of 57.5%, and (ii) On-Menu and Off-Menu incentives that exceed statutory and regulatory restrictions contained in the Government Code and the LAMC with respect to increased height, inadequate setbacks, etc. The Corrected Letter and its attachments also incorrectly calculate the number of Very Low Income (VLI) units that would be required for approval of the original proposed project, which is three VLI units (rounding up), not two (rounding down). In addition, the Corrected Letter appears to "approve" plans for a different, new project, the plans of which were not considered or discussed during any CPC meeting or made available to community stakeholders or calendared for public comment, and I and my neighbors have yet to receive a mailed copy of the Corrected Letter, or the original Letter of Determination dated 4/13/2021, despite that both bear a "MAILING DATE" and purportedly were mailed.
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>> You stated in your email to me, and in a similar email to one of my neighbors, that you reviewed the audio recording from the 2/25/2021 meeting and believe that the Corrected Letter conforms with the decisions of the Commission with respect to the project. It certainly does not. Preliminarily, you should note that the Commission considered the proposed project during two CPC meetings, not just one. During the first meeting, which occurred on 1/28/2021, the Commission acknowledged that the proposed project could not be approved outside the conditional use permitting process due to the excessive request for a density bonus and On-Menu and Off-Menu incentives that greatly exceed the limitation stated expressly under the Gov. Code and the LAMC. In particular, several Commissioners, and many community stakeholders living adjacent to or near the proposed project, including me and others living in my building, expressed concerns about the proposed height of the project, the inadequate setbacks, the lack of tenant and guest parking, the reductions of required open space, the dismal aesthetics of the project (especially the 6-story, 67'-tall, bright red wall with railing that looks like the inside of a prison), the specific adverse impact of the project on the physical environment (including the unnecessary destruction of mature trees and flora), and the general adverse impact on the Pico-Beverlywood neighborhood south of Alcott Drive. In particular, I refer you to comments of Commissioner Dana Perlman and DCP Deputy Director of Planning Lisa Webber during the 1/28/2021 meeting, when it was specifically discussed that the project could not be approved as a density bonus or TOC project, but that the project might be recommended to the City Council for a conditional use permit if material alterations were made to the project to adjust certain excessive incentives. Below are some of those statements:
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>> PERLMAN: As I said I don't believe we should be doing this ad hoc and on the fly I think this is more of a policy discussion. We've spent a lot of time at this commission about the consideration of the commission going into what are our on-menu what our off-menu incentives, why we are going to have certain on-menu and certain off-menu incentives and how we would deal with those depending upon the level "density bonus" that was being provided. We may want to revisit that and we may want to look at how that would impact different areas of the city and to me another way this should be dealt with is community planning which takes a lot longer. But in any event, when I look at a single project on a single corner and think, well, I'd hate to have that be the way that we change how we're looking at density bonus citywide because we're really not putting it into full context. And so that's what struck me. It's just I rarely seen density bonus cases with a 22-foot height variance without there being significant other issues coming before us and ... quite a higher percentage I should say of the base in affordable housing units then are provided here.

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>> So with all of that said, my thinking on this... This is coming to us now as a 15 unit project. It's my understanding and, correct me if I'm wrong, that this could be, we could change the conditional use to have height increase back at 11 feet as opposed to 22 feet, then it would be 14 units, two of which would remain covenanted affordable housing units, so if the incentives that they are seeking is really not required looking at the findings, we have to provide for those two affordable housing units because we can still get to those affordable housing units with 11 feet left, and also this mitigates the specific adverse impact on the neighboring properties so I think that's an obligation we have to look at that so that's what I'd propose.

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>> WEBBER: Just to be specific, your proposal is not to touch the density bonus because that creates issues and instead to look at the conditional use approval.

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>> PERLMAN. Correct.

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>> As you know, the DCP has no decision-making authority, and cannot unilaterally act or "approve" density bonuses or incentives. That authority rests with the CPC and must be exercised by the CPC, in strict compliance with the review and comment procedures, and with full and fair consideration by the Commission, upon a properly made motion approved by a majority of Commissioners. The Commission "approved" nothing during the 1/28/2021 and 2/25/2021 meetings with respect to the proposed project. Yet, astonishingly, the DCP prepared two separate Letters of Determination that seemingly overrule the unanimous decision of the Commissioners to reject the project, and apparently went so far as to affix Cecelia Lamas' name to both Letters while she has been out of the office on vacation and is currently in coronavirus quarantine. During the 1/28/2021 hearing, the Commissioners made clear that they would not, and could not, approve the proposed project without material alterations, especially in height, and that any recommendation for approval of the project would only be considered pursuant to the CUP regulations. Yet, the DCP signed off on the project as it was initially proposed without any reduction in the excess density bonus and by granting all of the requested On-Menu and Off-Menu incentives. As noted in my written objections, in my verbal objections during the two hearings, and in my recent emails to Ms. Lamas, as well as the objections of other stakeholders who reside immediately adjacent to or near the proposed project, this action is unlawful, it is legally void, and it should be corrected immediately.

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>> * The Commission has no authority to grant a density bonus greater than 35%. Although the DCP Report acknowledged that the "Density Bonus" chart for Very Low Income ("VLI") units does not provide for a density bonus in excess of 35%, the DCP Report states that a conditional use permit ("CUP") may provide for a density bonus exceeding 35%. Although the Corrected Letter of Determination acknowledges that the Commission rejected the proposed CUP, the Corrected Letter nevertheless appears to authorize a 57.5% density bonus. In the absence of a proper CUP, a 57.5% density bonus is prohibited by law. LAMC §12.22-A,25(c)(1) expressly prohibits a density bonus in excess of 35% under any circumstance. LAMC §12.22-A,25(c)(1) states: "Notwithstanding any provision of this Code to the contrary, ... [a] Housing Development Project that includes ... 5% of the total units of the project for Very Low Income households ... shall be granted a minimum Density Bonus of 20%," and "[t]he bonus may be increased according to the percentage of affordable housing units provided ... [in LAMC §12.22-A,25(c)(1), but shall not exceed 35%." (Similarly, the "Density Bonus" chart contained in Gov. Code §65915(f)(2) similarly precludes approval of a density bonus totaling 57.5% The maximum density bonus under Gov. Code §65915(f)(2) is only 50%.)

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>> * The Commission has no authority to grant the "On-Menu" Incentives for increased height and reduced setbacks. LAMC §12.22-A,25(f) lists the "Menu of Incentives," or "On-Menu" Incentives, that may be granted to projects that meet the qualifications of LAMC §12.22-A,25(e). (See LAMC §12.22-A,25(f)) Pursuant to subdivision (e)(1), a qualifying applicant may be

entitled to a yard/setback reduction equal to "[u]p to 20% decrease in the required width or depth of any individual yard or setback ... provided that the landscaping for the Housing Development Project is sufficient to qualify for the number of landscape points equivalent to 10% more than otherwise required." (See LAMC §12.22-A,25(f)(1)) Pursuant to subdivision (e)(5)(i), an applicant may be entitled to "[a] percentage increase in the height requirement in feet equal to the percentage of Density Bonus for which the Housing Development Project is eligible[.] [provided that] [i]n any zone in which the height or number of stories is limited, this height increase shall permit a maximum of eleven additional feet or one additional story, whichever is lower, to provide the Restricted Affordable Units." (LAMC §12.22-A,25(f)(5)(i)). The DCP Report acknowledges that the proposed project does not qualify under LAMC §12.22-A,25(f) to receive either the requested yard/setback reduction or the requested increase in height. (See DCP Report, at A-6) Nonetheless, the Corrected Letter of Intent disregards these provisions of the LAMC. The 30% reduction in setback exceeds the 20% that is authorized under subdivision (e)(1), and the request for a 22-foot increase in height greatly exceeds the 11-foot increase that may be allowed under subdivision (e)(5)(i).

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>> * The Commission likewise has no authority to approve the applicant's request for a waiver of the restrictions on these "On-Menu" Incentives. LAMC §12.22-A,25(g) governs "Off-Menu" Waivers. Under appropriate circumstances, an "Off-Menu" Waiver may be allowed for "any development standard(s) that is not included on the Menu of Incentives in [LAMC §12.22-A,25(f)] ... and that [is] not subject to other discretionary applications." (Id. §12.22-A,25(g)(3)(C)(i)) Because minimum setback requirements and height restrictions are "development standards" (see Gov. Code §65915(o)(1)), and these development standards are included in the Menu of Incentives contained in LAMC §12.22-A,25(0), the restrictions on setback reductions and height increases under §12.22-A,25(f) may not be "waived" under LAMC §12.22-A,25(g). The height restrictions in LAMC §12.22-A,25(f)(5)(i) also may not be "waived" under LAMC §12.22-A,25(g) because the increase-in-height limitation in §12.22-A,25(f)(5)(i) does not "have the effect of physically precluding the construction of a development ... at the densities or with the concessions or incentives permitted under [See Gov. Code §65915]" and LAMC §12.22-A,25. (See Gov. Code §65915(e)(1)) The applicant requested a 22-foot increase in height for the purpose of providing high-end lofts throughout the top floor of the building and to provide a rooftop deck. The elimination of these luxury amenities would not "physically preclude" construction of a project under applicable regulations. With respect to the setback limitations, no waiver may be permitted because it will have a "Specific Adverse Impact upon ... the physical environment," as defined in LAMC §12.22-A,25(b), and as stated by many neighborhood residents and some of the Commissioners during the 1/28/2021 and 2/25/2021 meetings.

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>> One more thing. The Corrected Letter of Determination dated April 27, 2021 (see <https://planning.lacity.org/pdiscaseinfo/search/encoded/MjM1MzQx0>) is completely detached from the actual proposed project and plans that were submitted to the Commission for approval and made available to community stakeholders for review and comment. The application for the project describes a 15-unit apartment building with a 20% set aside for Very Low Income units, and the plans for the project concern only this building. The Corrected Letter describes a similarly sized, 6-story, 67' high, 13-unit apartment building with only 11% of the base density set aside for Very Low Income units. No plans for a 13-unit project are contained within the file for the subject project; the Commission never considered any such plans; and community stakeholders were never given an opportunity to review and comment upon any such plans. If the applicant wants to submit a new proposal for a 13-unit apartment building, then notice should be given to community stakeholders, as required by law, the Neighborhood Council should hold a hearing and be given an opportunity to weigh in on the revised proposal, and the Commission may consider the revised proposal and the objections of impacted community stakeholders, of which there are many.

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>> I expect that this matter will be drawn to the attention of each Commissioner. I also expect that the Corrected Letter of Determination will be further corrected to conform with the Commission's actual decision before the 5/12/2021 appeal date so that I may avoid paying the filing fee for commencing an appeal to the Commission or filing a petition for writ of mandamus in the Los Angeles Superior Court. Also, if they exist and the DCP has them, I will appreciate receiving copies of the applicant's plans for the 13-unit apartment building described in Corrected Letter, or a link for downloading the new documents.

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>> Thank you.

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>> Alison

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>> Alison Block

>> 1436 S. Beverly Drive

>> Los Angeles, CA 90035

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>> On Friday, April 30, 2021, 2:13:04 PM PDT, Alexander Truong <alexander.truong@lacity.org> wrote:

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>> Hello,

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>> Thank you for your email concerning the determination letter for CPC-2020-595-DB-CU. We reviewed the audio for that meeting date and determined that the Letter of Determination is consistent with the action taken that day.

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>> While Commissioner Perlman did make a motion to deny the Conditional Use, no denial findings were provided with regard to the Density Bonus. The motion specifically discusses the findings for denial of the conditional use. Typically when the Commission denies a project, findings and a justification is provided for each entitlement request; in this case none were provided with regard to the density bonus incentives.

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>> Thank you,

>> Alex

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>> On Tue, Apr 27, 2021 at 3:48 PM Planning CPC <cpc@lacity.org> wrote:

>>> FYI-

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>>> ----- Forwarded message -----

>>> From: Alison Block <ablock811@yahoo.com>

>>> Date: Tue, Apr 27, 2021 at 12:37 PM

>>> Subject: Re: Case No. CPC-2020-595-DB-CU - 1432-1434 S. Beverly Drive - 2/25/2021 CPC Hearing

>>> To: Planning CPC <cpc@lacity.org>

>>> Cc: dperlman@perlmanlaw.com <dperlman@perlmanlaw.com>

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>>> Hi, Cecilia.

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>>> I was following up on the status of the application for a conditional use permit for the proposed project at 1432-1434 S. Beverly Drive. As you may recall, I submitted written objections to the DCP Recommendation Report based on a array of violations of the Government Code and the LAMC. For your convenience, a copy of my written objections is attached. In addition, certain neighbors who reside adjacent to the proposed project and I made oral objections during the telephonic hearing with respect to my written objections and other material objections to the proposed project.

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>>> During the hearing, my writtten objections were not considered. As I understand it, my written objections were not considered because the developer had elected to proceed under the regulations applicable to conditional use permits. The Commissioners therefore did not consider whether the proposed density bonus was lawful (which it is not), or whether the Commisson may, or should, approve certain of the proposed incentives in violation of express limitations contained in the Government Code and the LAMC (which it may not, and should not). The Commissioners also did not consider whether the DCP correctly calculated the minimum number of Required Restricted Affordable Units that would be required for approval of the proposed project. Instead, the Commissioners considered only whether to recommend approval of the conditional use permit, which requires a benefit to the community exceeding the adverse consequences of the proposed project. Based on the motion of Commissioner Perlman, which is stated on the official audio record of the hearing, the Commissioners present voted 8-0 in favor of denying approval of a conditional use permit and that was the end of it.

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>>> Yesterday, when I went online to check on the status of the proposed project, I took note that the "CPC Action" was "DENIED." A copy of the online record is attached. However, the Letter of Determination that accompanies the online record is inconsistent with the motion and actual ruling of the Commission. The attached Letter of Determination correctly states that the proposed conditional use permit was "disapproved and denied" (paragraph 2), but the Letter also states, incorrectly, that the proposed density bonus and all of the requested incentives were "approved" by the Commission (paragraph 3), and that the Commission "adopted" the Modified Conditions of Approval and Amended Findings of the DCP (paragraphs 4, 5). In fact, that did not happen. No motion was made with respect to the DCP Recommendation Report, and the Commissioners never considered the developer's request for an unlawful density bonus, for prohibited incentives, or for a reduction in the Required Restricted Affordable Units. I assume that the inclusion of paragraphs 3-5 were clerical errors made by the DCP staff members who prepared the Letter.

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>>> I note also that the Letter of Determination for the proposed project states that it was mailed on "Apr 13 2021." However, I did not receive a copy of the Letter of Determination, none of the neighbors in my buidling received a copy of the Letter, and a copy of the Letter is not posted on the proposed project site. Given that the Letter appears to set a final appeal date of "Apr 28 2021," which is tomorrow, I will appreciate a response today (1) whether the clerical errors contained in the Letter of Determination will be corrected to strike paragraphs 3-4, which were not part of Commissioner Perlman's motion or any other motion made during the hearing, and which are contrary to law, and, (2) if not, whether the appeal date is actually April 28, 2021, given that the Letter of Determination apparently was not mailed to everyone who resides in properties adjacent to the site of the proposed project and was not posted. A prompt response to this email also may allow me to avoid paying the filing fee required to appeal from the incorrectly prepared Letter of Determination.

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>>> Thank you.

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>>> Stay safe, and have a great day!

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>>> Alison Block

>>> 1436 S. Beverly Drive

>>> Los Angeles, CA 90035

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>>> On Thursday, February 25, 2021, 11:31:21 AM PST, Planning CPC <cpc@lacity.org> wrote:

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>>> Hello Ms. Block,

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>>> Day of submissions are posted online on our website at the end of the meeting, but they can also be found in the shared drive as listed on the first page of the agenda.

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>>> Please click on this link for your review: <https://drive.google.com/drive/folders/1uB-2a2sl7Pn1GyLx3E-HxjhV9SMhDmUg?usp=sharing>

>>>

>>> Your submission was distributed prior to opening item 5a. Please do not hesitate to reach out with any other questions or concerns you may have. Thank you.

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>>> On Thu, Feb 25, 2021 at 11:26 AM Alison Block <ablock811@yahoo.com> wrote:

>>>> Hi Cecillia.

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>>>> I was reviewing the supplemental documents shown on the CPC website for the 2/25/2021 hearing. My Day of Hearing Submission is not included in the pack of materials made available online. (There are no Day of Hearing Submissions included.) Please be sure that my submission is added to the online materials so that they are included in that record and be sure that the materials are made available to the Commissioners.

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>>>> Thank you so much.

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>>>> Stay safe!

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>>>> Alison Block

>>>> 1436 S. Beverly Drive

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>>>> (310) 617-5700

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>>>> On Thursday, February 25, 2021, 7:48:37 AM PST, Planning CPC <cpc@lacity.org> wrote:

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>>>> Good morning,

>>>> Please note your submission has been received and will be distributed to the City Planning Commission for the meeting of February 25, 2021. Thank you.

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>>>> Cecilia Lamas

>>>> Commission Executive Assistant

>>>> Los Angeles City Planning

>>>> 200 N. Spring St., Room 272

>>>> Los Angeles, CA. 90012

>>>> Planning4LA.org

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>>>> On Wed, Feb 24, 2021 at 11:12 AM Alison Block <ablock811@yahoo.com> wrote:

>>>>> Good morning.

>>>>>

>>>>> Attached is my Day of Hearing Submission for Case No. CPC-2020-595-DB-CU.

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>>>>> Also attached is a ZIP file containing several photos of the subject property, 1423-1434 S. Beverly Drive.

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>>>>> Please confirm that you received my submissipon and photos and that they will be delivered for consideration by the Commission.

>>>>>

>>>>> Thank you. Stay safe!

>>>>>

>>>>> Alison Block

>>>>> 1436 S. Beverly Drive

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>>>>> (310) 617-5700

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A Block CPC Appeal Application 05-11-2021.pdf

1.5MB



A BLock Justification_Reason for Appeal.pdf

3.2MB