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May 2, 2023

VIA U.S. EMAIL
Hon. Marquece Harris-Dawson, Chair
Plannning and Land Use Committee
Los Angeles City Council
200 N. Spring Street, Rm. 395
Los Angeles, CA 90012
(https://cityclerk.lacity.org/publiccomment/)

VIA U.S. EMAIL
Holly Wolcott, City Clerk
City of Los Angeles
200 N. Spring Street, Rm. 395
Los Angeles, CA 90012
(holly.wolcott@lacity.org,
clerk.plumcommittee@lacity.org)

Re: 464-466 Crane Boulevard Project - Failure to Provide Notice
May 2, 2023 PLUM Meeting Item # 10, CF No. 22-0163

Dear Chairman Harris-Dawson and Members:

This firm represents the Crane Boulevard Safety Coalition, landowners and tenants affected by the subject Project and its cumulative impact during construction of up to 10 house projects in a two-block area of Crane Boulevard. We ask that the City Clerk add this letter to all case files for the Project (CF No. 22-0163). Please confirm via return email correspondence that this has been done.

APPLICABLE PRINCIPLES OF DUE PROCESS.

The California Supreme Court observes that "The requirement for a fair hearing under section 1094.5 is grounded in due process." *Today's Fresh Start, Inc. v. Los Angeles County Office of Educ.* (2013) 57 Cal.4th 197, 215. Adjudicatory or quasi-judicial proceedings where an administrative agency exercises discretion to apply laws, regulations and policies to a specific set of facts, and such adjudication makes binding determinations that affect legal rights of individuals, require due process of law under both the U.S. and California Constitutions. *Londoner v. Denver* (1908) 210 U.S. 373, 385-386 (federal due process required opportunity for an oral hearing before street paving assessment could be levied against affected landowner's property); *Horn v. County of Ventura* (1979) 24 Cal.3d 605, 610 ("we consider whether approval by defendant county of a tentative subdivision map is an 'adjudicatory' function which, under principles of due process, requires that **both** appropriate notice and an opportunity to be heard be given to persons whose property interests may be significantly affected. We will hold that such

approval is 'adjudicatory,' and that rights to prior notice **and hearing** are accordingly invoked.")(Emphasis added.)

In the realm of land use and environmental decisionmaking, the California Supreme Court in *Horn* specifically held that landowners within the potential environmental impact area surrounding a proposed development project who could be affected by access, traffic and air emissions, were owed constitutional due process rights of notice and a meaningful opportunity to be heard to challenge grant of the applicant's proposed subdivision project and the adequacy of the environmental review under CEQA. *Horn* at 612-615. The petitioner landowner in the *Horn* case owned an adjacent parcel of land, and was found to have standing to allege that he and all other nearby landowners received no notice or opportunity to be heard. *Id*. at 619 ("the complaint avers that no prior notice or hearing had previously been given to any affected landowner, or to plaintiff or his predecessor.")

In analyzing the territorial scope of the right to due process as an affected landowner, the California Supreme Court emphasized that the right to due process expands in land use and environmental matters with the magnitude of the project and its potential impacts on a widening area of affected landowners. *Horn* at p. 618 ("depending on the magnitude of the project, and the degree to which a particular landowner's interests may be affected, acceptable techniques [of notice of a right to be heard] might include notice by mail to the owners of record of property situate within a designated radius of the subject property, or by the posting of notice at or near the project site, or both. Notice must, of course, occur sufficiently prior to a final decision to permit a "meaningful" pre-deprivation hearing to affected landowners").

Our Supreme Court emphasized the importance of the notice sufficiently prior to the hearing in order to allow affected landowners to prepare evidence and testimony to present to the decision maker so that it would be "meaningful." The larger the project, the larger the number of affected individuals whose property or other substantial rights could be impacted, and such individuals, distinct from others further away from the project site who may only have statutory Brown Act public comment rights, have a constitutionally protected right to appear at the hearing and be allowed meaningful time to present the testimony and evidence they were constitutionally required to be invited by the public agency to have an opportunity to present. And if the project impacts individuals across jurisdictional lines, a City is required to give notice to all potentially impacted landowners in the adjoining jurisdiction. *Scott v. City of Indian Wells* (1972) 6 Cal.3d 541.

In *Horn*, the California Supreme Court specifically observed that in conducting an adjudicatory or quasi-judicial hearing the ability of affected landowners to organize themselves to petition the government, present testimony and evidence, and turn out in numbers could shape the ultimate decision. "Resolution of these issues [of the merits of a subdivision map] involves the exercise of judgment, and the careful balancing of conflicting interests, the hallmark of the adjudicative process. **The expressed opinions of the affected landowners might very well be persuasive to those public officials who make the decisions, and affect the outcome of the subdivision process**."(Emphasis added.) *Id*. at 615. In other words, in California a "meaningful" hearing is one where the affected landowners, who presumably received a notice of hearing (an invitation to present oral testimony and evidence before a decision is made), is entitled to a meaningful opportunity to be heard before the public officials at the noticed public hearing, and to participate in the adjudicative process.

In California, such procedural due process is owed not only to landowners but to affected tenants of surrounding properties. *Pillsbury v. South Coast Regional Community* (1977) 71 Cal.App.3d 740, 750-755 (notice required for neighbors of project, not only landowners but also residents whether they own property or not if they could be affected by the project).
Just a few months after deciding *Horn*, our Supreme Court held in *People v. Ramirez* (1979) 25 Cal.3d 260, 269 that California due process required a dignitary interest not recognized in federal law: "More specifically, identification of the dictates of due process generally requires consideration of (1) the private interest that will be affected by the official action, (2) the risk of an erroneous deprivation of such interest through the procedures used, and the probable value, if any, of additional or substitute procedural safeguards, (3) **the dignitary interest in informing individuals of the nature, grounds and consequences of the action and in enabling them to present their side of the story before a responsible governmental official**, and (4) the governmental interest, including the function involved and the fiscal and administrative burdens that the additional or substitute procedural requirement would entail." (Emphasis added.) In recognizing under California law a "dignitary interest," our Supreme Court departed from federal case precedent. California requires adjudicative hearings to be conducted so that persons with constitutional interests at stake are treated with dignity.

The meaning of the dignitary interest is found also in the *Ramirez* opinion: "[w]e therefore hold that the due process safeguards required for protection of an individual's statutory interests must be analyzed in the context of the principle that freedom from arbitrary adjudicative procedures **is a substantive element of one's liberty**. [Cite omitted.] This approach presumes that when an individual is subjected to deprivatory governmental action, **he always has a due process liberty interest both in fair and unprejudiced decision-making and in being treated with respect and dignity**." *Ramirez* at 268. Our Supreme Court criticized federal constitutional precedents in failing to require treatment of affected persons with dignity: "The federal approach also undervalues the important due process interest in recognizing the dignity and worth of the individual by treating him as an equal, fully participating and responsible member of society. [Citations omitted.] 'For government to dispose of a person's significant interests without offering him a chance to be heard **is to risk treating him as a nonperson, an object, rather than a respected, participating citizen**.' [Citation omitted.] Thus, even in cases in which the decision-making procedure will not alter the outcome of governmental action, due process may nevertheless require that certain procedural protections be granted the individual in order to protect important dignitary values, or, in other words, 'to ensure that the method of interaction itself is fair in terms of what are perceived as minimum standards of political accountability -- of modes of interaction which express a collective judgment that human beings are important in their own right, and that they must be treated with understanding, respect, and even compassion.' [Citations omitted.]" *Ramirez* at 267-268, emphasis added.

Thus, in assessing whether the procedural process used by a public agency was a "mode of interaction" that meets "minimum standards of political accountability" that assured those with constitutionally protected dignity interests were identified as such, accorded a respectful hearing where they were given a reasonable amount of time to testify and provide evidence/argument, and were in fact respectfully listened to and the decision making was based upon the record and not extraneous matters, a reviewing court must examine the procedural rules and mechanisms in place to enforce this particularized Californian dignitary requirement. Regardless of whatever process a public agency may adopt, it is required to follow it in the conduct of its adjudicatory process, or due process is denied. *Layton v. Merit System Commission* (1976) 60 Cal.App.3d 58, 63.

Both federal and state cases also define an impartial trial as one where the decisionmakers restrict their process to the record and evidence before them, follow the codified process of their own rules, and do not base the decision on information outside the record, including briefings from staff or colleagues lobbying them outside the hearing room. "Due process requires a fair trial before an impartial tribunal. Such a trial requires that the person or body who decides the case must know, consider and appraise the evidence." *Vollstedt v. City of Stockton* (1990) 220 Cal.App.3d 265, 275 citing "'*Hohreiter v. Garrison*, 81 Cal.App.2d 384, 401. . .; *Morgan v. United States*, 298 U.S. 468 . . . .)' (*LeStrange v. City of Berkeley* (1962) 210 Cal.App.2d 313, 325." The U.S. Supreme Court in *Morgan* found the Secretary of Agriculture had not afforded a lawful hearing where he made his decision solely from consultations with subordinates. The *Vollstedt* court cited and summarized "[t]he fundamental principle that 'the one who decides must hear'" as set forth in *Morgan*: "The court noted that the 'hearing' is designed to afford the safeguard that the one who decides shall be bound in good conscience to consider the evidence, to be guided by that alone, and to reach his conclusion uninfluenced by extraneous considerations which in other fields might have play in determining purely executive action. The 'hearing' is the hearing of evidence and argument. If the one who determines the facts which underlie the order has not considered the evidence or argument, it is manifest that the hearing has not been given." *Vollstedt* at 275 analyzing *Morgan*.

One final important requirement of a fair hearing consistent with constitutional due process is the necessity an impartial decision maker. "A biased decisionmaker is constitutionally unacceptable." *Cohan v. City of Thousand Oaks* (1994) 30 Cal.App.4th 547, 559. "[B]ias -- either actual or an "unacceptable probability" of it -- alone is enough on the part of a municipal decision maker is show a violation of the due process right to fair procedure. *Menning v. City Council of the City of Culver City* (1978) 86 Cal.App.3d 341, states the constitutional rule that a City Council or members thereof can be constitutionally barred from participation in an adjudicatory hearing when they either have a pecuniary interest in the outcome or if they have become "embroiled" in the controversy creating an unacceptable risk that decision making will not be based upon an impartial consideration of the record and evidence but rather extra record considerations such as personal animosity or an unusual involvement in the subject matter of the adjudicatory hearing. "The test of the ability of the administrative body to act is whether in light of the particular facts 'experience teaches that the probability of actual bias on the part of the ... decisionmaker is too high to be constitutionally tolerable.' (citation omitted].) Thus 'those with a substantial pecuniary interest in legal proceedings should not adjudicate these disputes.' (*Gibson v. Berryhill* (1973) 411 U.S. 564, 579 [citation omitted].) The decision may not be made by a decisionmaker who has become personally "embroiled" in the controversy to be decided. (*Taylor v. Hayes* (1974) 418 U.S. 488, 501-503 [citation omitted], cited for its applicability to administrative proceedings in *Withrow v. Larkin, supra,* 421 U.S. 35, 47, fn. 15 [citation omitted].) *Menning* at 350-351.

Procedural due process in the administrative setting requires that the hearing be conducted "*before a reasonably impartial, noninvolved reviewer*." *Nasha v. City of Los Angeles* (2004) 125 Cal.App.4th 470, 483, citing *Gai v. City of Selma* (1998) 68 Cal.App.4th 213, 219 (italics added). "To establish an unfair hearing based upon bias [the aggrieved party] must establish "'an unacceptable probability of actual bias on the part of those who have actual decisionmaking power over their claims.' (*BreakZone Billiards v. City of Torrance* (2000) 81 Cal.App.4th 1205, 1236.) A party seeking to show bias or prejudice on the part of an administrative decisionmaker is required to prove the same 'with concrete facts: [b]ias and

prejudice are never implied and must be established by clear averments.' (*Id.*, at p. 1237; accord *Hongsathavij v. Queen of Angels etc. Medical Center* (1998) 62 Cal.App.4th 1123, 1142." *Nasha* at 358.

In addition to *Menning v. City Council of the City of Culver City* (councilmembers personally embroiled unfairly increased Police chief's discipline), numerous California cases overturned adjudicatory actions of municipal bodies where a member was unconstitutionally embroiled in the matter before the hearing. *Clark v. City of Hermosa Beach* (1996) 48 Cal.App.4th 1152 (Councilmember Benz organized opposition to Clark's duplex project that would affect his view of the ocean before he was elected, opposed a later version after he was elected that would still affect his view, and exhibited personal animosity toward Mrs. Clark and her children on the beach and on a Friday night urinated on the Clark's house and planter which led to City Police escorting him home); *Nasha v. City of Los Angeles* (2004) 125 Cal.App.4th 470 (area planning commissioner Lucente ghost wrote editorial opposing development project as a threat to wildlife corridor and worked with opponents outside the hearing room); *Woody's Group, Inc. v. City of Newport Beach* (2015) 233 CA4th 1012 (Councilmember Henn filed unauthorized appeal, led off the hearing following public comment with detailed advocacy prepared prior to hearing that ran 14 pages, made the motion to deny the permit, and lobbied his colleagues outside the hearing to obtain their support of his viewpoint); *Petrovich Development Co. v. City of Sacramento* (2020) 48 Cal.App.963 (Councilmember in time period leading up to the adjudicatory hearing met with homeowners group appealing gas station conditional use permit to strategize how to defeat the gas station, prepared and circulated talking points that advocated denial of the gas station, told others he had the votes to deny the permit, and made the motion to deny the permit.) In all of these cases, the facts established the councilmember or planning commissioner had abandoned the adjudicatory role required by procedural due process ("a reasonably impartial and uninvolved reviewer") and crossed a line into advocacy and embroilment with the issue.

AN APPEAL HEARING PURSUANT TO PUBLIC RESOURCES CODE SECTION 21151(c) IS AN ADJUDICATORY PROCEEDING UNDER HORN v. COUNTY OF VENTURA.

The City of Los Angeles codified its CEQA appeal process under Public Resources Code section 21151(c) at LAMC section 11.5.13. Subdivision E of section 11.5.13 provides in part:

"The City Council shall hold a public hearing before acting on the appeal. Notice of the hearing shall be given by mail at least ten days before the hearing to the applicant; the appellant; any person or entity that has made a request in writing to receive CEQA notices; and any responsible or trustee agencies."

The notice provision of the City's CEQA hearing procedure is constitutionally infirm. The municipal code acknowledges that there is a constitutional duty to inform the landowner of the Project, the appealing party, and any interested party. The inclusion of a mailed notice at least 10 days prior to the hearing date is an admission by the City that a CEQA hearing is an adjudicatory or quasi-judicial proceeding in which the City will exercise discretion to apply the facts of the Project (the Project description which must be complete and accurate) to the applicable state laws and regulations.

But once the CEQA appeal process is determined adjudicatory or quasi-judicial in nature,

the City has no constitutional authority to pick and choose who is allowed to be invited to know the date, time, and place of the CEQA appeal hearing. Constitutional notice is owed to ALL potentially affected landowners, tenants, persons commenting on or asking to be informed about the Project in any way, and trustee agencies under CEQA. In the seminal case of *Horn v. County of Ventura*, discussed in detail above, the County's hearing concerned not only the proposed approval of a tract map, but also concerned the County's determinations of the level of environmental review under CEQA. Both of those determinations were fact-based determinations as applied to a particular parcel of land, and the Supreme Court gave emphasis to the fact that standing of the nearby landowner to sue over the failure to give notice of the hearing was in part based upon allegations that the nearby property owners would be affected by possible environmental impacts of the Project.

The City's codified hearing notice provision for CEQA is infirm because it restricts notice to the smallest group of landowners, tenants and interested persons that does not encompass the possible area around the Project impacted including landowners and tenants living in the area around the Project affected, including those affected by potential landslide, damage to Crane Boulevard, street closures, failure to mitigate illegal tree removals affecting the habitat areas near their homes. In this case, a Project has been discussed in detail as failing to comply with the applicable zoning laws including the Los Angeles Municipal Code (Baseline Hillside Ordinance), the Mount Washington Specific Plan, and other laws. For this reason alone, the Project would not qualify for the CEQA exemption the City claims applies.

The City's implementing provisions, that purport to require a person interested in the Project to have specifically requested notices involving only CEQA instead of expressing interest and concern about the Project generally by sending public comments or appearing at a prior hearing, are constitutionally unreasonable. Landowners and tenants potentially affected by the Project, including those concerned about the City's compliance with all applicable laws if they have commented with a mailing address or email address, are entitled to notice and inclusion on the interested person list.

Accordingly, the City's municipal code impermissibly restricts notice for an adjudicatory or quasi-judicial process and can only be cured if actual notice is mailed to all those who are affected by the Project or have commented or asked for information about the project.

PRIOR TO THE CITY'S MAILED NOTICE OF THE MAY 2, 2023 PLUM COMMITTEE HEARING, THE CITY COMPILED TWO MAILING LISTS TO GIVE NOTICE TO PERSONS, BUT FAILED TO USE THOSE MAILING LISTS TO GIVE NOTICE OF THIS CEQA APPEAL HEARING.

The facts in this case establish that the City has long possessed at least two compiled lists in its records of surrounding property owners. After the Planning Director issued his initial determination in this case, the matter was appealed by the Crane Boulevard Safety Coalition to the area planning commission. The hearing was scheduled for July 14, 2021. Upon receipt of the Coalition's appeal analysis and evidence, the City Planning Department failed to prepare any staff report in response. At the opening of the virtual hearing on July 14, 2021, City Planner Debbie Lawrence immediately asked the area planning commission to approve a "continuance to a date uncertain." Commissioner Campos observed that there were a lot of people attending the hearing and waiting to speak. She asked how persons attending would be notified of the new hearing date. Between the 3:00 and 4:00 minute mark of the recording of the meeting, Ms.

Lawrence stated that everyone would receive notices including those on the interested persons list. Ms. Lawrence also represented that the Planning Department emails notices to persons it identifies as interested persons. When the continued hearing was conducted on December 8, 2021, the City filed an affidavit of mailing that included a list of recipients far more than only the project applicant and appealing organization. The list included landowners and tenants surrounding the project location and a list of persons who had commented on the project or appeared at the July 8, 2021 commission hearing. **Exhibit 1** is a true and correct copy of this affidavit and list of persons to be notified. Even then the City failed to send notice of the hearing to trustee agencies, including the California Department of Fish and Wildlife, which has jurisdiction over natural resources including the open space habitat areas of Mount Washington on or adjacent to the Project.

Exhibit 1 is the City's sworn affidavit that it mailed notice of the area planning commission hearing on December 8, 2021 to a list of surrounding property owners or tenants, and to a list of persons who the City identified as "interested persons" for the Project. **Exhibit 2** is a copy of a City Planning Department compiled "interested persons" email list we obtained in a public records request to staff. The City used these lists to give notice of the hearing at the planning commission level.

Although the City had these two compiled mailing and email lists in the Project file, when a CEQA appeal hearing was scheduled at the City Council, the Planning Department used a substantially reduced list to give notice of this adjudicatory and quasi-judicial hearing. **Exhibit 3** is a copy of the mailing list the City Clerk asserts was used to give notice of the May 2, 2023 hearing. We do not know who compiled this list. We do not know if it was prepared by the owner, the owner's architect/representative, or the City Planning Department. What we do know by comparing the lists is that the City had a much larger list of people, including people the City identified as "interested persons," and all of those interested persons were deleted from receiving notice for arguably the most important hearing at City Council.

If the City reduced the mailing list in reliance on the wording of its CEQA appeal municipal code provision, that provision is constitutionally unlawful. Lay persons who wish to participate in the City's process should not have to be a Philadelphia lawyer to trigger an obligation of the City Planning Department to put their name on the "interested person" list whether they commented at a Director's or Zoning Administrator or City Planning Commission hearing, an appeal hearing before any City planning commission, or filed a written or email request to be on the "interested persons" list. To suggest that once a person is on the "interested person" list for one hearing, that person can be deemed not an "interested person" for the next hearing, is untenable constitutionally. To suggest that a person must specifically ask for notice of CEQA matters in order to receive notice as an interested person to one type of a hearing on a Project the City might conduct is also untenable constitutionally. Once the City identified a person as "interested" they should have remained on the notice mailing list for all purposes. The wording of the City's CEQA appeal code provision is a transparent effort to unlawfully restrict and frustrate the efforts of an average person to ask to be informed about a Project. Thus, the deletion of all previously identified "interested persons" is in violation of the U.S. and California constitutions.

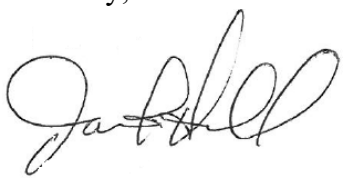
Even worse, the City deleted from the mailing list persons it says it previously notified who own or live property within 100 feet of the Project site. Under the holdings in *Horn v. County of Ventura*, as an adjudicatory or quasi-judicial proceeding, all such persons were constitutionally required to receive notice and a right to be heard meaningful at the CEQA public

hearing.

For all of the foregoing reasons, the May 2, 2023 Planning and Land Use Committee hearing has not been lawfully noticed to the affected and interested community.

Thank you for your prompt attention to this matter. I may be contacted at 310-982-1760 or at jamie.hall@channellawgroup.com if you have any questions, comments or concerns.

Sincerely,



Jamie T. Hall

Exhibit 1 - November 19, 2021 Affidavit of mailing
Exhibit 2 - Spreadsheet of Interested Persons in Planning Records
Exhibit 3 - Mailing list used for CEQA appeal hearing

Exhibit 1

City of Los Angeles
Department of City Planning

Affidavit of Mailing

Case Number DIR-2020-427-SPP-1A

This Affidavit concerns (check one of the following):

- ☒ **Public Hearing**
- ☐ **CPC/APC Courtesy Notice**
- ☐ **Letter of Decision (LOD)**
- ☐ **Withdrawn**
- ☐ **Hold Letter**
- ☐ **Notice of Requested Waiver**
- ☐ **Tribal Notification**
- ☐ **Letter of Correction**
- ☐ **Termination Letter**
- ☐ **Intent to Terminate**

I, Maria Reyes, certify that I am an employee of the City of Los Angeles, on November 19, 2021 (Date), mailed, postage prepaid, to the applicant and all parties required by the Municipal Code, as indicated below, on the case indicated above, a true copy of which is attached:

Public Hearing

Check Recipients Below:

- ☒ Owner, Applicant and Representative
- ☐ Abutting Property Owners
- ☐ Abutting Property Owners and Tenants
- ☒ 100-foot Radius
- ☐ 500-foot Radius
- ☒ Persons who signed in at the hearing
- ☒ Appellant(s)
- ☒ Council Office No. 1
- ☒ Certified Neighborhood Council Arroyo Seco
- ☐ 100-foot Coastal Notice
- ☐ Group Coastal Notice
- ☐ State Coastal Commission
- ☐ Adjacent City/ies
- ☐ Los Angeles Unified School District
- ☐ Caltrans
- ☐ Other _____

Staff Report / Appeal / Termination / Letter of Decision

Check Recipients Below:

- ☐ Owner, Applicant and Representative
- ☐ Abutting Property Owners
- ☐ Abutting Property Owners and Tenants
- ☐ Persons who signed in at the hearing
- ☐ Persons who requested notice in writing
- ☐ Council Office No. _____
- ☐ Certified Neighborhood Council _____
- ☐ Department of Building and Safety
- ☐ Department of Transportation
- ☐ Other _____

Staff Signature

CURRENT OCCUPANTS
234 W MUSEUM DR
LOS ANGELES CA 90065

CURRENT OCCUPANTS
151 W FURNESS AVE
LOS ANGELES CA 90042

CURRENT OCCUPANTS
155 W FURNESS AVE
LOS ANGELES CA 90042

CURRENT OCCUPANTS
159 W FURNESS AVE
LOS ANGELES CA 90042

CURRENT OCCUPANTS
458 N CRANE BLVD
LOS ANGELES CA 90065

CURRENT OCCUPANTS
460 N CRANE BLVD
LOS ANGELES CA 90065

CURRENT OCCUPANTS
464 N CRANE BLVD
LOS ANGELE, CA 90065

CURRENT OCCUPANTS
466 N CRANE BLVD
LOS ANGELES CA 90065

CURRENT OCCUPANTS
475 N CRANE BLVD
LOS ANGELES CA 90065

CURRENT OCCUPANTS
471 N CRANE BLVD
LOS ANGELES CA 90065

CURRENT OCCUPANTS
467 N CRANE BLVD
LOS ANGELES CA 90065

CURRENT OCCUPANTS
463 N CRANE BLVD
LOS ANGELES CA 90065

CURRENT OCCUPANTS
465 N CRANE BLVD
LOS ANGELES CA 90065

CURRENT OCCUPANTS
459 N CRANE BLVD
LOS ANGELES CA 90065

CURRENT OCCUPANTS
462 N CRANE BLVD
LOS ANGELES, CA 90065

CURRENT OCCUPANTS
165 W FURNESS AVE
LOS ANGELES CA 90042

CURRENT OCCUPANTS
470 N CRANE BLVD
LOS ANGELES CA 90065

CURRENT OCCUPANTS
472 N CRANE BLVD
LOS ANGELES CA 90065

APPELLANT
CHRISTOPHER HOWARD
CRANE BLVD SAFETY COALITION
438 CRANE BLVD
LOS ANGELES CA 90065

APPELLANT REPRESENTATIVE
JAMIE HALL
THE CHANNEL LAW GROUP
8383 WILSHIRE BLVD SUITE 750
BEVERLY HILLS CA 90211

INTERESTED PARTY
PAT WINTERS
1401 RANDALL COURT
LOS ANGELES CA 90065

APPLICANT/OWNER
RACHEL FOULLON & IAN COOPER
2262 DUANE STREET
LOS ANGELES CA 90039

REPRESENTATIVE
SIMON STOREY
ANONYMOUS ARCHITECTS
1800 S BRAND BLVD SUITE 117
GLENDALE CA 91204

AUTRY NATIONAL CENTER OF THE
4700 WESTERN HERITAGE WAY
LOS ANGELES CA 90027

MARGARET COLLIER
2112 THOREAU ST
LOS ANGELES CA 90047

COOPER, IAN J CO TR
2262 DUANE ST
LOS ANGELES CA 90039

NEIL MUKHOPADHYAY
3919 W 8TH ST APT 12
LOS ANGELES CA 90005

FERNANDO OJEDA RIOS III
137 1/2 S SWEETZER AVE
LOS ANGELES CA 90048

MARQUE TOLIVER
PO BOX 53801
LOS ANGELES CA 90053

TRASK, JUSTIN M TR
5356 ALDAMA ST
LOS ANGELES CA 90042

INTERESTED PARTY
JAROSLAW BIEDA
4261 SAN RAFAEL AVE
LOS ANGLES CA 90042

INTERESTED PARTY
CURTIS HILL
4111 CAMINO REAL
LOS ANGELES CA 90065

INTERESTED PARTY
LAURA LEE
909 MT WASHINGTON DRIVE
LOS ANGELES CA 90065

INTERESTED PARTY
LYNN SOSA
4807 GLENALBYN DR
LA, CA 90065

INTERESTED PARTY
ROBIN SCHERR
4249 SEA VIEW LANE
LOS ANGELES CA 90065

INTERESTED PARTY
KAREN PEDERSEN AND HUGH KING
954 ELYRIA DRIVE, LA, CA 90065

INTERESTED PARTY
TODD FRANKEL
610 WEST AVENUE 46
LOS ANGLES CA 90065

Exhibit 2

Interested parties for case: DIR-2020-427-SPP

1/28/2021	landuse@mwha.us	Pat Winters	1401 Randall Court, LA CA 90065
7/15/2021	jaroslawb@gmail.com	Jaroslaw Bieda	4261 San Rafael Ave, LA, CA 90042
7/14/2021	Lynnpsosa@gmail.com	Lynn Sosa	4807 Glenalbyn Dr, LA, CA 90065
7/14/2021	goldleroux@aol.com	Kathleen Goldstein	
7/14/2021	mark.b.kenyon@gmail.com	Mark Kenyon	505 W Avenue 44, LA, CA 90065
7/14/2021	mike-t10@roadrunner.com	Michael Thompson	472 Crane Boulevard, LA, CA 90065
7/15/2021	Karen.leafygreen@gmail.com Hughk16@gmail.com	Karen Pedersen and Hugh King	954 Elyria Drive, LA, CA 90065
7/15/2021	curtis@artdirectionservices.com	Curtis Hill	4111 Camino Real, LA, CA 90065
7/15/2021	rdscherr1@gmail.com	Robin Scherr	4249 Sea View Lane, LA, CA 90065
7/15/2021	tsfrankel@roadrunner.com	Todd Frankel	610 West Avenue 46, LA, CA 90065
7/21/2021	llee.lcsw@gmail.com	Laura Lee	909 Mt. Washington Drive, LA, CA 90065
11/24/2021	rep@pfiesterlaw.com	Ed Pfiester	
11/24/2021	fiberflash@gmail.com	Dan Wright	

Exhibit 3

Determination Mailing For:
DIR-2020-427-SPP-1A
Mailing Date: December 28, 2021

Council District 1
City Hall, Room: 460
Mail Stop: 201

Applicant: Rachel Foullon and Lan Cooper
2262 Duane Street
Los Angeles Ca 90039

Representative: Simon Story
Anonymous Architects
1800 South Brand Boulevard Suite 117
Glendale, CA 91204

Appellant: Christopher Howard Crane
Boulevard Safety Coalition
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