

# LUNA & GLUSHON

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February 7, 2018

## VIA E-MAIL

Los Angeles City Council  
200 North Spring Street  
Los Angeles, CA 90012

Re: CPC-2016-1208-CU-SPR/ENV-2016-1209-MND  
12575 Beatrice Street (12553-12575 West Beatrice Street; 5410-5454 S.  
Jandy Place)

Honorable Councilmembers:

Our law firm represents Appellant Karney Management Company (“Appellant”), the manager and owners’ representative of the parcels located immediately to the west and south of the proposed construction of a new 155-foot high office building and associated parking, landscaping, and hardscape at 12553-2575 West Beatrice Street; 5410-5454 S. Jandy Place (“the Project”).

As set forth in previous correspondence and as explained at the Planning and Land Use Management Committee hearing, this Council should grant Appellant’s appeal based upon the reasons previously expressed, including because the legally mandated findings for the Project, as proposed, cannot be made with substantial supporting evidence and the Mitigated Negative Declaration (“MND”) for the Project is inadequate as a matter of law, including the California Environmental Quality Act (“CEQA”).

We have reviewed the “Supplemental Responses” submitted by the Applicant in advance of the Planning and Land Use Management Committee hearing and this Council should be aware that such responses neither remedy any of the concerns raised by the Appellant nor adequately address any of the legal contentions raised regarding the Project’s CEQA, Subdivision Map Act or other state or local law compliance.

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Again, we ask that the City Council grant Appellant's appeal, deny this Project, as proposed, and require the Applicant to revise the Project in compliance with applicable law.

Very truly yours,

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A handwritten signature in black ink, appearing to read "Rob Glushon", written in a cursive style.

ROBERT L. GLUSHON