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Date: November 5, 2025

To: City Planning Commission

Re: Item 7 – CPC-2022-9268-DB-HCA; 13916 W. Polk St., Sylmar – 40-Unit Residential Care Facility for the Elderly (RCFE) — **Opposition to Requested Waivers & Request for Protective Conditions**

Honorable Commissioners:

The Sylmar Neighborhood Council (SNC) supports adding affordable senior housing in Sylmar. We nevertheless oppose the majority of the requested waivers for the Polk RCFE because, taken together, they remove basic, objective protections that safeguard senior health, safety, and access on a high-volume corridor with incomplete sidewalks and limited transit. Where denial of a particular waiver is not legally feasible, we request narrowly tailored protective conditions that eliminate the specific harms identified below.

Summary Position

Approve urgently needed senior housing only with the following safety, access, stormwater, and compatibility protections. If these cannot be secured, deny the implicated waivers and continue the item to allow staff, the applicant, and agencies (LADOT/LAFD/LASAN/LAHD) to develop a compliant mitigation package.

Why the Waivers Should Be Denied (or Conditioned)

- 1) **Frontage Dedications & Improvements (Sidewalks/ADA/Lighting) — Oppose Waiver:** Waiving dedications and frontage work on Polk and Lyle would leave seniors without a continuous, ADA-compliant accessible route to the public way. On a four-lane corridor with no curb parking and spotty sidewalks, this is a direct life-safety and fall-risk issue. **Action:** Require full dedications and construction of sidewalks, ADA curb ramps, curb/gutter, and street lighting, plus at least one high-visibility crosswalk at the primary entrance.
- 2) **Zero Automobile Parking (From 80 spaces to 0) — Oppose Waiver / Require Operations Plan:** AB 2097's parking-minimum prohibition does not apply at this location (site is not within ½-mile of a major transit stop and fail the 2 or more bus headways ≤20-minutes/peak test). With no on-street parking and no on-site spaces, caregivers, paratransit, medical transport, and service deliveries would be forced into unsafe lane-stops. **Action:** If any parking waiver is granted, require a binding Transportation Operations Plan with an on-site, ADA-compliant passenger loading zone, signed paratransit MOUs, scheduled delivery windows, and on-site staff assistance, all reviewed by LADOT and LAFD/EMS prior to C of O.
- 3) **Bicycle Parking (From 10 short-term & 19 long-term to 0) — Oppose Waiver:** Eliminating all bicycle parking contradicts the project's car-lite premise and removes a zero-emission mobility option for staff and visitors. **Action:** Provide code-minimum short- and long-term bicycle parking (with secure, weather-protected long-term space and micromobility charging).
- 4) **LID (Low Impact Development) — Oppose Waiver / Replace with Performance Standard:** A blanket LID waiver increases runoff/flood risk and undermines groundwater recharge/quality goals in the Upper LA

River Area while removing urban-heat mitigation (green infrastructure). **Action:** Replace the waiver with a performance-based condition: infiltrate first-flush to maximum extent feasible; where infeasible, provide on-site capture & reuse (irrigation) or pay off-site mitigation to a local watershed project. Enforce via plan check and final sign-off by LASAN and ULARA Watermaster.

- 5) **Setbacks, Landscaping, Trees, and Open Space — Oppose Waivers:** Zeroing front/side setbacks, landscaping, and tree plantings, while slashing open space to ~1,713 sf, eliminates shade, cooling, and rest areas seniors need for safe outdoor waiting and recovery. **Action:** Restore a meaningful portion of open space and require street trees and/or shade structures with seating along accessible routes (on-site or within the public right-of-way if site area is constrained).
- 6) **Height & FAR — Concern; Acceptable with Frontage/Operations/LID/Bike Conditions:** We focus our opposition on functional safety rather than bulk alone. If height (to 44 ft) and FAR (2.0:1) remain, they must be paired with the protective measures above to offset the removal of setbacks and green buffers.
- 7) **Use of Entire Front Yard for Driveway/Fire Lane — Oppose as Proposed:** Using the entire front yard for vehicle movement without a separated, marked ADA pedestrian path creates conflict points at the main entry. **Action:** Provide a delineated, accessible pedestrian route from sidewalk to entrances, physically separated from drive aisles, with detectable warnings and lighting.
- 8) **Equine-Keeping (K) Standards — Oppose Blanket Waiver:** The site's RA-1-K context supports long-standing equine functionality: safe frontage widths/clearances, trailer maneuvering, and reduced conflicts. A blanket waiver erodes that functionality and neighborhood character. **Action:** If any relief is granted, require frontage design and traffic controls that maintain K-area safety (clear frontages, trailer protection, dust/mud control) rather than erasing standards entirely.
- 9) **CEQA Class 32 Exemption — Request Protective Findings/Record:** If relying on Class 32, the record should reflect that adopting the frontage, loading, LID, shade, and bike conditions eliminates specific, adverse safety and environmental impacts for a vulnerable senior population on this corridor.

Requested Commission Actions

- 1) **Deny the waivers for:**
 - a) **Dedications/frontage improvements**
 - b) **Bicycle parking**
 - c) **LID (replace with performance standard)**
 - d) **Landscaping/trees/open space**
 - e) **Blanket equine-keeping relief**
 - f) **Front-yard driveway use without a separated ADA path**
- 2) If any parking reduction is granted, **adopt an enforceable Transportation Operations Plan** with an on-site, ADA-compliant paratransit/caregiver/ambulance loading zone, delivery logistics, and LAFD/LADOT concurrence.
- 3) **Condition height/FAR relief** on completion of the protective measures above.
- 4) If consensus on conditions is not possible today, **continue the item to allow staff, agencies, and the applicant to finalize a mitigation package** consistent with the HAA while protecting senior health & safety.

Sincerely,

Sylmar Neighborhood Council