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- **“Secondary Submissions”**: Submissions received after the Initial Submission deadline up to 48-hours prior to the Commission meeting are contained in this file and bookmarked by the case number.
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If you have any questions, please contact the Commission Office at (213) 978-1300.

SECONDARY SUBMISSIONS



Department of City Planning

City Hall, 200 N. Spring Street, Room 272, Los Angeles, CA 90012

November 16, 2020

TO: City Planning Commission

FROM: Deborah Kahen, Senior City Planner

TECHNICAL MODIFICATION TO THE STAFF RECOMMENDATION REPORT FOR CASE NO. CPC-2020-87-GPA-ZCJ-SPR-HCA; 412-426 CROCKER STREET AND 414-425 TOWNE AVENUE

The following technical modification is to be incorporated into the staff recommendation report to be considered at the City Planning Commission meeting of November 19, 2020, related to Item No. 5a on the meeting agenda. The initial submittal inadvertently did not include the Landscape Plan. Planning Staff recommends that the Commission consider and approve the attached Landscape Plan (Page L-1) as part of Exhibit A at its meeting on November 19, 2020.



TREE LEGEND

SYM.	BOTANICAL NAME	COMMON NAME	SIZE	QTY.	REMARKS	WUCOLS
	* Arbutus 'Marina'	Marina Strawberry Tree	24"box	3	low branching	low 0.3
	* Cupressus s. 'Glauca'	Italian Cypress	24"box	12		low 0.3
	* Laurus nobilis	Sweet Bay	24"box	19		low 0.3
	* Lyonothamnus floribundus	Catalina Ironwood	24"box	3		low 0.3
	* Podocarpus henkelii	Sweet Bay	24"box	4		low 0.3
	* Schinus molle	Cal. Pepper Tree	24"box	1		low 0.3
	* Heteromeles arbutifolia	Toyon	24"box	2		low 0.3
	Street tree	Per City req.	15-gal	8		low 0.3

SHRUBS AND GROUND COVER LEGEND

SYM.	BOTANICAL NAME	COMMON NAME	SIZE	QTY.	REMARKS	WUCOLS
	* Aspidistra elatior	Cast Iron Plant	5-gal	104		low 0.3
	* Bulbine frutescens orange		5-gal	15		low 0.3
	* Carex divulsa	Berkeley Sedge	5-gal	36		low 0.3
	* Chondropetalum elephanthinum	Large Cape Rush	5-gal	7		low 0.3
	* Lomandra l. 'Platinum Beauty'	Dwarf Mat Rush	5-gal	26		low 0.3
	Myoporum p. 'Pink'	Pink Australian Racer	5-gal	24"oc		low 0.3
	* Portulacaria a. 'Variagata'	Yellow Rainbow Bush	5-gal	5		low 0.3
	* Portulacaria afra 'Aurea'	Yellow Rainbow Bush	5-gal	5		low 0.3
	Portulacaria afra 'Prostrate Form'	Dwarf Elephant Food	5-gal	5"oc		low 0.3

* Points claimed for low water

TREE COMPLIANCE:	
175 units (1 24" box tree per 4 units)	44
Proposed number of trees	44

All trees to be planted with commercial root barriers.
3" deep shredded Cedar bark to spread between plants.

NOTE:
All groundcover areas where plants are 3'oc or greater
to have 2 layers of geotextile fabric in 2 different directions
geotextile fabric installed 3" below finished grade w/
3" shredded bark above to eliminate weed growth.

NOTE:
Waterproofing and drains in planters by others.

PLANTING NOTES

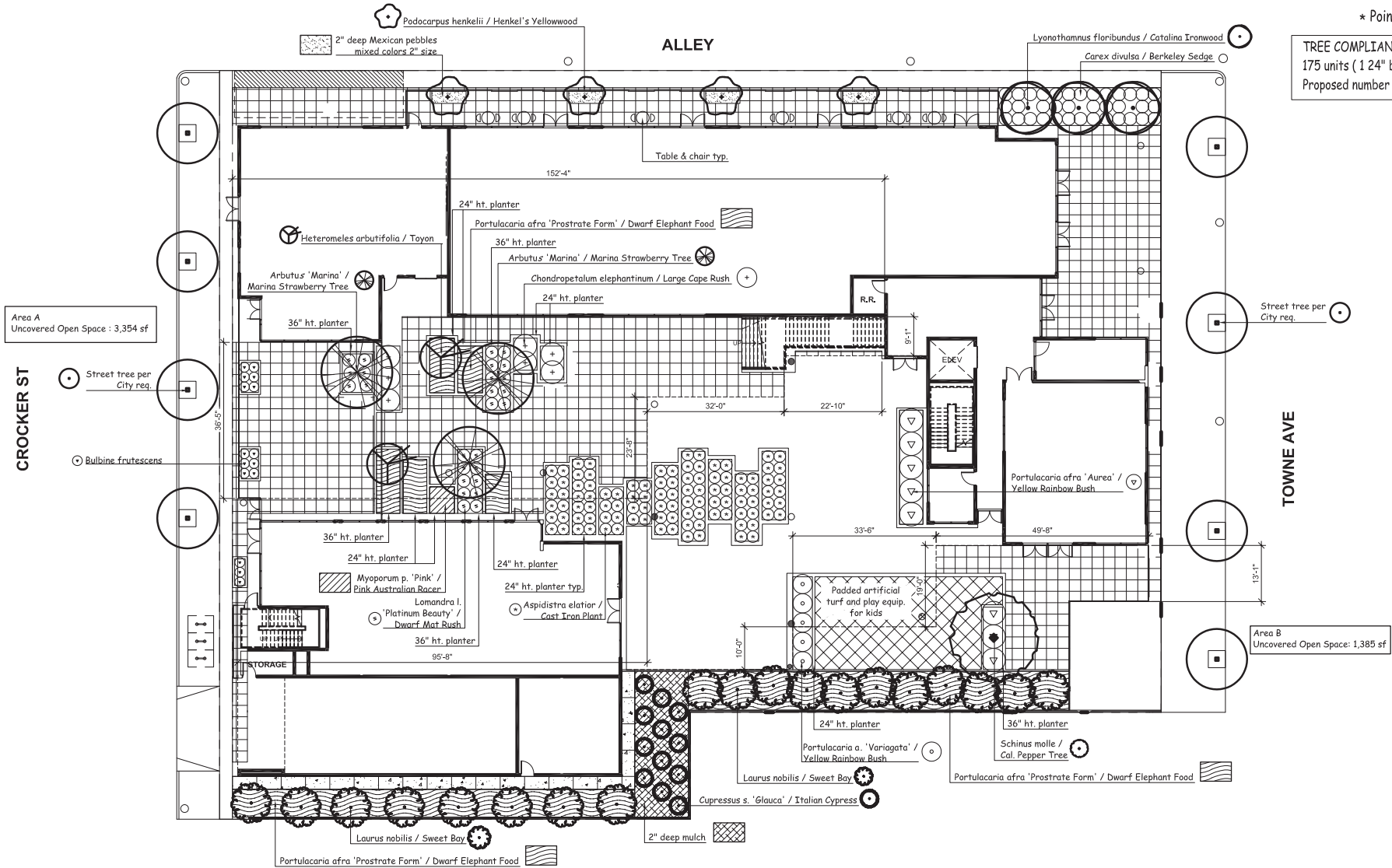
- DRAWING IS DIAGRAMMATIC: CONTRACTOR TO VERIFY ALL LOCATIONS AND CONDITIONS ON SITE. COUNT ALL PLANT MATERIAL BEFORE BIDDING.
- CONTRACTOR TO INSPECT ALL EXISTING CONDITIONS ON SITE AND LOCATE ALL EXISTING UTILITIES BEFORE CONSTRUCTION BEGINS.
- CONTRACTOR TO REPAIR AT HIS OWN EXPENSE ALL PROPERTY DAMAGE WHICH OCCURS DURING PROJECT INSTALLATION.
- NOTE ADDITIONAL REMARKS ON SPECIFIC PLANTS IN PLANT LIST.
- ALL EXISTING PLANT MATERIAL TO BE REMOVED EXCEPT WHERE NOTED ON PLAN.
- CONTRACTOR TO GUARANTEE ALL PLANT MATERIAL FOR 90 DAYS FROM THE DATE OF ACCEPTANCE BY OWNER. PALM TO BE GUARANTEED FOR THE PERIOD OF 1 YEAR.
- FINISH GRADE TO BE 2" BELOW ALL WALKS, CURBS, AND PAVING.
- ALL PLANTED AREAS SHALL RECEIVE THE FOLLOWING AMENDMENTS PER 1,000 SQ. FT. OF SURFACE AREA, ROTO-TILL AMENDMENTS TO A DEPTH OF 6"
*150 LBS. GRO-POWER
*3 CU YDS NITROGENIZED, MINERALIZED FIR BARK
*ADD 8 LBS OF GRO-POWER CONTROLLED RELEASE 12-8-8 PER CU YD OF MIX.

- PLANT HOLE TO BE TWICE AS WIDE AND DEEP AS THE PLANT ROOT BALL. BACKFILL AND COMPACT TO 80 % SOIL OF SITE AND 20 % FIR BARK, AS DEFINED IN #8. PROVIDE GRO-POWER PLANT TABLETS AT THE FOLLOWING RATIOS:

5 GAL	6-9
24" box	14-16

PLACE RECOMMENDED TABLETS BETWEEN THE BOTTOM AND THE TOP OF THE ROOT BALL BUT NO HIGHER THAN 1/3 OF THE WAY UP TO THE TOP OF THE ROOT BALL. SPACE TABLETS EQUALLY AROUND THE PERIMETER OF THE ROOT BALL APPROXIMATELY 2" FROM THE ROOT TIPS. PALM TREES ARE NOT TO RECEIVE TABLETS.

- ALL PROPOSED SHRUBS AND GROUND COVER AREAS ARE TO BE TREATED WITH A PRE-EMERGENT WEED KILLER (EPTAM / RONSTAR). APPLY PER MANUFACTURER'S SPECIFICATIONS: A) IMMEDIATELY AFTER PLANTING, B) AT THE BEGINNING OF THE MAINTENANCE PERIOD, AND C) AT THE END OF THE MAINTENANCE PERIOD.
- CONTRACTOR TO INSTALL AND MAINTAIN LANDSCAPE PLANTING IN ACCORDANCE WITH THE GOVERNING AGENCY'S GUIDELINES AND SPECIFICATIONS UNLESS NOTED OTHERWISE IN THESE NOTES OR ON THE PLANS.
- SOIL SAMPLES TAKEN FROM VARIOUS LOCATIONS IN THE PLANTING AREAS WILL BE SENT TO A SOIL LAB FOR PROFESSIONAL ANALYSIS AND RECOMMENDATIONS FOR SOIL IMPROVEMENT. CONTRACTOR TO FOLLOW SOIL TESTING RECOMMENDATIONS.
- USE OF CLASS I OR CLASS II COMPOSTPRODUCED USING CITY ORGANIC MATERIALS (TOPGRO®) IN A MAJORITY OF LANDSCAPED AREAS



REVISIONS	DATE
1.	
2.	
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9.	



ASLA
Yael Lir Landscape Architects
1010 Sycamore Ave. Suite 313
South Pasadena, CA 91030
Tel 323.258.5222
Fax 323.258.5333
yael@yaellir.com

175 UNIT APARTMENT
414 CROCKER ST.
LOS ANGELES, CA 90013

PLANTING PLAN



DATE: DEC. 16, 2019
SCALE: 1/16"=1'-0"
JOB NUMBER: 215019
DRAWN BY:

City Hall, 200 N. Spring Street, Room 272, Los Angeles, CA 90012

TO: City Planning Commission

TECHNICAL CORRECTION TO THE STAFF RECOMMENDATION REPORT FOR CASE NO. CPC-2019-4992-CPIOA-ZAD-SPR-WDI; 5860 WEST JEFFERSON BOULEVARD

The following is a proposed revised Conditions of Approval to the Director of Planning's staff report. Measures BR2 (of Condition 25) and N3 (of Condition 30) are to be deleted as they are inapplicable to the Project. The Project would not remove any protected trees, as none are located on the Project site, and thus, condition BR2 would not apply to the Project. Condition N3 is not applicable to the Project, as the Project does not include the development of an industrial use.

25.

BR2 — Any approval of a Discretionary project or “*Active Change Area Project*”, shall ensure that during the final design phase of the proposed project, and prior to the start of the demolition/construction phase, the project applicant shall submit a final landscape plan to the City of Los Angeles for approval by the City’s Chief Forester and the Director of the Bureau of Street Services. The final landscape plan shall include provisions to either protect in place the existing protected trees in or adjacent to the project site, per the requirements of the City of Los Angeles Tree Preservation Ordinance.

30.

~~**N3** Any approval of a Discretionary project or “Active Change Area Project” that includes industrial uses located within 1,000 feet of a residential land use shall ensure that a noise study is completed that uses the significance thresholds established in the City of Los Angeles CEQA Thresholds Guide (including as it may be amended in the future). Identified impacts shall be mitigated per the City’s Noise Ordinance or through any measures identified in the noise study.~~

40.

CR4 Any approval of a Discretionary project or “Active Change Area Project” shall ensure that prior to excavation and construction on a proposed project site, the project applicant shall perform a cultural resources literature and records search by an institution recognized and approved by the City of Los Angeles Planning Department to assess the potential for the proposed project site to contain sensitive protected cultural resources.



Department of City Planning

City Hall, 200 N. Spring Street, Room 763, Los Angeles, CA 90012

November 16, 2020

TO: City Planning Commission

FROM: Alex Truong, City Planning Associate
Department of City Planning, Expedited Processing Section

TECHNICAL MODIFICATION TO THE STAFF RECOMMENDATION REPORT FOR CASE NO. CPC-2020-4095-ZV-CU-SPR; 1608-1636 WEST PICO BOULEVARD AND 1321-1331 SOUTH UNION AVENUE

The following are proposed revisions to the Conditions of Approval, to be incorporated into the staff recommendation report to be considered at the City Planning Commission meeting of November 19, 2020, related to Item No. 9 on the meeting agenda. The proposed modifications regard fencing around the parking lot, conditions on lighting and the terminology of monitors.

Parking Lot

The Department of City Planning recommends that Condition No. 8.c., as currently written, be modified with the following underlined and ~~striketrough~~ language to clarify the location of the screening material:

- 8.c. Prior to the issuance of a certificate of occupancy, a minimum eight-foot high wall made of slumpstone, decorative masonry, or other similar screening material shall be constructed along the southern, ~~eastern~~, and western property lines of the parking lot located at 1321-1331 South Union Avenue, if and to the extent no such wall exists, and a wrought-iron fence shall be constructed along the eastern property line of such parking lot, as depicted in the plans in Exhibit A, ~~if no such wall already exists.~~

Lighting

The Department of City Planning recommends that Condition No. 9., as currently written, remain because it is repeated in condition number 20 within the staff recommendation report:

20. [DELETED]

Monitors

The Department of City Planning recommends that Condition No. 14.d., as currently written, be modified with the following underlined and ~~striketrough~~ language to account for monitors that will only assist with pedestrian traffic:

- 14.d. Ten (10) or more ~~parking~~ monitors, consisting of school staff and parent volunteers wearing orange vests or other distinctive attire, shall supervise the pick-up/drop- off of

students during the prescribed hours and maintain smooth ingress to and egress from the subject property. At least one monitor shall be positioned at the eastern end of the alley at Union Avenue and at least one monitor shall be positioned at the western end of the alley at Constance Street to ensure efficient movement of cars entering and exiting the alley to pick up and stop off students. One of the monitors shall be a "traffic ambassador" who is specially employed and trained by the applicant to prevent parents from (i) parking or double-parking on Constance Street and blocking driveways on Constance Street, (ii) queueing their cars on Union Avenue for pick-up or drop-off, (iii) picking up and dropping off students on Constance Street or Union Avenue, (iv) blocking access to the residential parking lot near Constance Street that can be accessed from the alley, and (v) to direct pedestrian traffic along Union Avenue towards the north building entry along Pico Boulevard. The other monitors shall assist and support the traffic ambassador to prevent such violations. The traffic ambassador shall have the authority to take reasonable actions to enforce these requirements and require corrective action. The traffic ambassador shall report any such violations to the school administration and provide applicable license plate numbers.

All of the revisions herein do not affect the requested entitlements and do not substantially alter the project as depicted in the plans in Exhibit A; rather, they are technical clarifications to better reflect the proposed operations.



November 16, 2020

Deborah Kahen, Senior City Planner
deborah.kahen@lacity.org
(213) 978-1202

To whom it may concern,

We are writing to you in support of the proposed 175-unit affordable mixed use project with on-site supportive services, at 412 – 426 Crocker Street, CPC-2020-87-GPAJ-VZCJHD-SPR-HCA-PHP/ ENV-2020-88-SCPE. We urge the city to find the project Categorically Exempt from the provisions of CEQA, redesignate the land use of the project site from Light Manufacturing to Regional Commercial, approve a Vesting Zone Change and Height District Change and permit the following Affordable Housing Incentives:

- 60% reduction in the overall required open space
- 35% interior common open space to be provided toward the total Open Space requirement in lieu of 25%
- No parking space be required for units set aside at the Extremely Low and Very Low Income levels

The greater Los Angeles region is facing a severe housing shortage, and this project will provide much needed supportive, affordable housing. Abundant Housing LA supports affordable housing production throughout LA, especially in high-resource, exclusionary parts of the city. This project will provide badly-needed units in Downtown LA, where there is currently a deficit of affordable housing. While we support this project, we also recognize the need for more affordable housing throughout LA. We are actively advocating for policies that distribute affordable housing throughout the City, including neighborhoods of opportunity.

This project is close to numerous transit options. Montebello Busline 40 and Metro Line 18 run between Downtown LA and Montebello/Whittier and stop at the project's corner, as do 2 other Metro bus routes. Line 62 runs between Boyle Heights and Long Beach, with stops at transportation centers, shopping centers and a hospital. Line 53 runs between Downtown LA and CSU Dominguez Hills with stops at parks and Compton/Woodley Airport.

It is great to see the developer using Affordable Housing Incentives to bring badly needed affordable and supportive housing to the city. This project is a good project for Los Angeles and for the region. Again, we urge the city to approve the incentives and find the project Categorically Exempt from the provisions of CEQA.

Best Regards,

Leonora Camner

Leonora Camner
AHLA Executive Director

Roderick Hall

Roderick Hall
AHLA Organizing Director

Tami Kagan-Abrams

Tami Kagan-Abrams
AHLA Project Director



November 16, 2020

Deborah Kahen, AICP
Senior City Planner
Los Angeles City Planning
200 N. Spring Street
Los Angeles, CA 90012

Re: Letter of Support for CPC-2020-87-GPAJ-ZCJ-SPR-HCA – 414 Crocker Apartments project

Deborah:

On behalf of the Downtown Women's Center ("DWC"), a neighbor of the proposed 414 Crocker Apartments, I write to express our unreserved support for this critical project undertaken by the Little Tokyo Services Center, a long-time community partner.

As a homeless services provider and member of the Skid Row community since 1978, DWC firmly believes that only by advancing permanent housing solutions can we truly eradicate homelessness. DWC operates 119 units of permanent supportive housing, helped house nearly 600 women last year through our Community Based Housing program, and provided services to over 5,400 women.

From DWC's 2019 Los Angeles City Women's Needs Assessment that conveyed over 80% of women struggle to access housing and a March 2020 California Policy Lab analysis of HUD data that revealed unsheltered women wait an average of 14 years to access permanent housing, it is clear unhoused women face particularly high barriers in attempting to access housing. The 414 Crocker project will provide vital housing that the women we serve, the greater Skid Row neighborhood, and the entire city of Los Angeles so desperately need. We also know that over 15,000 individuals in L.A. County have been identified for housing but remain unhoused due to our dearth of affordable housing.

We urge the swiftest possible approval of the 414 Crocker Apartments, so that we can promptly provide housing to more of our most vulnerable neighbors.

Sincerely,

Zachary R. Warma
Public Affairs Lead,
Downtown Women's Center

November 13, 2020

Los Angeles Department of City Planning
Deborah Kahen, Senior City Planner
200 N. Spring Street
Los Angeles, CA 90012

**RE: 100% Affordable Housing Project at 414 Crocker Street by Little Tokyo Service Center
(Case No. CPC-2020-87-GPAJ-VZCJ-HD-SPR-PHP)**

Dear Ms. Kahen,

Homeless Health Care Los Angeles (HHCLA) is writing to express its strong support for the Crocker (Umeya) Apartments project located at 414 Crocker Street, Los Angeles, CA 90013.

HHCLA is a non-profit, community-based organization founded in 1985 with the mission of providing innovative strategies for reducing the impact of homelessness in the communities of Los Angeles County. The agency's focus is on street outreach, harm reduction services, substance use treatment, mental health care, health services, overdose prevention, hygiene access, and permanent supportive housing. HHCLA historically serves the highest risk populations in Los Angeles. Additionally, HHCLA has facilities and offices located at 512 E. 4th St. in Los Angeles and is a neighbor of the Crocker (Umeya) Apartments project.

HHCLA supports the Crocker (Umeya) Apartments project because it is a 100% affordable housing project that will set aside half of all units as permanent supportive housing, with the balance of units set aside for low income households earning less than 50% AMI. Little Tokyo Service Center will be the on-site service provider of intensive case management services and other wraparound services. Every day, as we provide care and services to our houseless neighbors, we witness firsthand the increase in homelessness and affordable housing crises exacerbated by the COVID-19 pandemic and climate change. HHCLA can't emphasize enough the urgent need for affordable and permanent supportive housing, particularly for projects like Crocker (Umeya) Apartments that provide for deeper affordability.

As the City undertakes downtown planning and rezoning efforts like DTLA 2040, it becomes imperative that our neighborhood sees affordable and supportive housing projects like Crocker (Umeya) Apartments in the coming years, built by locally-based, community-driven organizations like Little Tokyo Service Center. Crocker (Umeya) Apartments is a critical addition to the neighborhood. We urge the City of Los Angeles to prioritize and expedite this project as it moves through entitlements review and subsequent phases of the development process.

HHCLA is pleased to offer its strong support of Crocker (Umeya) Apartments. Should you have any questions, please do not hesitate to contact me at (213) 739-1627 or via email at mcasanova@hhcla.org.

Sincerely,



Mark Casanova
Executive Director

**H O M E L E S S
H E A L T H C A R E
L O S A N G E L E S**

headquarters

1282 w. 2nd street
los angeles, california 90026

main site

2330 beverly boulevard
los angeles, california 90057

center for harm reduction

512 e. 4th street
los angeles, california 90013

HHCLA is a 501(c)(3)
non-profit organization
tax ID 95-4074970

hhcla.org

213.744.0724 phone



Regarding 414 Crocker Street - Public Comment on CPC Agenda Item # CPC-2020-87-GPAJ-VZCJ-HD-SPR-HCA-PHP

Vivienne Lee <vhldusp@yahoo.com>

Wed, Nov 11, 2020 at 8:50 AM

To: cpc@lacity.org

Cc: deborah.kahen@lacity.org

November 13, 2020

City Planning Commission
201 N Figueroa St
Los Angeles, CA 90012
cpc@lacity.org

Dear Commissioners:

I am writing to you to indicate my support for LTSC Community Development Corporation's (LTSC) proposed project at 414 Crocker. I am a resident of Little Tokyo Lofts, a residential property within 500-feet of the project, and have been living in Skid Row/Downtown for 14 years.

As a resident of the Central City community plan area, I want to stress the importance of affordable and supportive housing in order to create a healthy neighborhood and to sustain the culture and livelihoods of low-income communities, immigrants, and unhoused people that call Downtown home. We are in a critical time as the city plans for the growth of the Downtown Area. I believe that this project will give deeper affordability for residents who have experienced or are at risk of houselessness.

I write in support of the 414 Crocker Street Project because it will provide 175 units of affordable housing, with half of the units set aside for permanent supportive housing. As I witness the grave impact of the pandemic on my community, on my neighbors, I know that the city must continue its pipeline of building affordable housing and I believe that this project will support those efforts. The City of Los Angeles should continue to support this project as it moves through the development process which is being undertaken by LTSC, the project developer. LTSC has been heavily engaging with the local community to ensure this project comes to fruition.

As a full-service social service agency and partner/developer in a number of affordable and special needs housing projects, LTSC has a unique perspective in providing asset management services. Their portfolio includes adaptive re-use, historic designated buildings, housing, commercial space, and social service space. Their residential units are mostly affordable multi-family housing and provide oversight to units dedicated to special needs populations, including transitional housing for survivors of domestic violence, formerly homeless persons, and mentally disabled adults. This is an important factor as we look at new development in the neighborhood. LTSC is a responsible developer and believes in the power of the human potential. This is an important factor in my support for this project.

By supporting the project at 414 Crocker, I believe you are contributing not only to the advancement of a comprehensive strategy to support low-income households and houseless Downtown residents, but also strengthening ties between Downtown, Little Tokyo and Skid Row communities. I truly believe that we can live and thrive in mixed income/housing neighborhoods and a mix of affordable for families, permanent support housing, and with market rate residents is the type of neighborhoods we need to see more of in LA and throughout our County.

11/17/2020

City of Los Angeles Mail - Regarding 414 Crocker Street - Public Comment on CPC Agenda Item # CPC-2020-87-GPAJ-VZCJ-HD-SPR...

Thank you for your time and consideration.

Sincerely,

Vivienne Lee

Resident, LTL (Little Tokyo Lofts)

Email: vhldusp@yahoo.com

Attention Hearing Officer Truong and City Planning Commission
RE: Equitas Academy Charter Schools - CPC-2020-4095-ZV-CU-SPR

November 10, 2020

We write this letter as longtime residents of the Pico-Union area who wish to express our opposition to Equitas Academy's proposed expansion. Equitas Academy is already creating serious traffic and parking problems for the neighborhood, and we believe the expansion will make a bad situation worse. The process for approving the expansion has done nothing to assuage our concerns:

The Most Immediately Impacted Residents Have Not Had An Opportunity To Make Their Views Known

There have been three meetings on the expansion. Of necessity they were held online, but this format is a serious barrier in a neighborhood where many of the residents lack adequate internet access or are simply uncomfortable with the technology. This problem was compounded by Equitas' failure to adequately publicize the meetings. Astonishingly, the Public Hearing (10/21) was announced only in English even though the neighborhood consists mainly of Spanish speakers. In the other case (10/08), Equitas' efforts can be described only as desultory. This stands in stark contrast to their efforts with their own clients who were made aware of the meetings and encouraged to attend. In order to redress this unfairness, we circulated a petition in opposition to the expansion and soon had over 100 signatures. A petition, however, is a blunt instrument. It allows those who sign to state only that they oppose the expansion. It does not allow them to state how it will affect them personally. Again, this stands in stark contrast to Equitas' clients who have been allowed to describe at length the benefits the school provides them. As yet there has not been a satisfactory airing of the views of the immediate neighborhood!

Equitas has not been honest in their dealings with the city government and the community

Equitas Academy told Councilman Gil Cedillo and community representatives that they did not intend to convert the building at 1612 Pico Boulevard into a school serving additional students. Yet this is exactly what they now propose to do.

Equitas' Traffic Plan Is Not Credible

Traffic congestion is the most serious problem that Equitas causes for the community. We have seen this every day for 8 years; and that is with a school serving 462 students. The expansion will bring an additional 1,000 students to the area. In other words, traffic will be three times as bad. Equitas has prepared a traffic plan which we find to be seriously flawed.

- The plan was prepared by a consulting firm paid for by Equitas. Therefore, it is not an unbiased analysis and should be evaluated accordingly.
- The plan calls for school traffic to make use of Constance St., which is a violation of the Conditional Use Permit.
- The substance of the plan is deeply flawed:
 - It is predicated on the assumption that queues will not exceed 17 cars because 70% of students walk to school. We regularly see queues longer than that now!
 - It does not adequately address the traffic back-ups that will be caused at the intersection of Pico and Union.
 - It ignores the following issues:
 - two alley parking-lots will be blocked during drop-off and pick-up times.
 - alley traffic poses a hazard to pedestrians and vehicles entering and leaving the alley parking lots
 - the alley is used for garbage collection and this may conflict with Equitas' schedule for drop-offs and pick-ups.

Attention Hearing Officer Truong and City Planning Commission

RE: Equitas Academy Charter Schools - CPC-2020-4095-ZV-CU-SPR

- Equitas' traffic will block the DASH stop on the corner of Pico and Union
- Equitas' traffic will block Pico Clinica Medica Latina's drop-off/loading area, which is used by the elderly the disabled.

Equitas' expansion will exacerbate the neighborhood's serious parking problems

- The city added restrictions to 9 metered spaces in order to accommodate Equitas' school at 1700 Pico Blvd. We are concerned that Equitas' expansion will require similar accommodations. We anticipate that restrictions will be needed at 11 additional metered spaces.
- Parking in in Pico-Union is already inadequate, and residents therefore have no choice but to park in these metered spaces. These parking restrictions require them to move their cars at extremely inconvenient times.

Exhaust from Equitas' traffic poses a serious health risk to the residents

- At present cars idle continuously for 30 – 45 minutes during drop-offs and pick-ups. The expansion will make this problem significantly worse.
- There are 6 individual homes, five apartment complexes and two businesses in the immediate area.
- Armored Transport, the previous occupant of 1610 W. Pico, acknowledged this problem, posting signs warning of carcinogens from their idling trucks.

Equitas has not been a good member of the community

The Equitas' school at 1700 W Pico has been in operation for 8 years. During that time

- Parents and staff drive and park on local streets in violation of Conditional Use Permit.
- They make up their own parking signs that further restrict residential parking.
- Ignored problems at 1610-1612 prior to taking ownership despite the fact they created an unsafe environment for their own students. Since 2017, 1612 W. Pico attracted drunkards who urinated, defecated, vomited, passed out on the sidewalk and performed sexual and lewd acts.

The proposed traffic plan will not work. This, with the increased student body, will impact the community significantly. A PowerPoint presentation with more information has also been submitted. We hope that our letter and presentation will help you and the City Planning Commission understand the reasons why the residents are opposed to Equitas' conversion and traffic plan proposal.

Thank you for your time,

Andrew and Yasmin Corona

Aurora Corona

Maggie Ibarra and Mike Rieger and Family

Nery Larios

104 Residents Who Signed Opposition Petitions

November 12, 2020

File Number: 65WY-307331

BY EMAIL

Los Angeles City Planning Commission
City of Los Angeles
200 N. Spring Street, Room 272
Los Angeles, California 90012
Email: cpc@lacity.org

Re: Summary of Traffic Operations for Equitas 5-6 Elementary
Schools Project (CPC-2020-4095-ZV-CU-SPR, the "Project")

Honorable President and Commissioners:

This firm represents Equitas Academy Charter Schools ("Equitas") regarding the Project. During Equitas' extensive community outreach, several Pico-Union residents who live closest to the project site raised a general concern that the student drop-off and pickup for short periods in the morning and afternoon could impact the neighborhood, based on the combined maximum enrollment of 1,000 students for the schools. Some residents more specifically suggested that the line of cars arriving for drop-off/pickup might potentially back up onto Union Avenue (as discussed below, this is the street from where cars enter the drop-off/pickup area).

The assumption underlying these concerns was that the drop-off and pickup activities would involve 1,000 cars each day (i.e., every student would be driven to school with one student in each car). In addition, a few residents claimed that, in the past, parents of students at the existing Equitas Academy elementary school (located at 1700 Pico Boulevard, across the street to the west from the project site) sometimes failed to drop off or pick up their kids within the designated area on the south side of Pico Boulevard.

Since this was the principal land use issue raised at the four community meetings and forums, we summarize the relevant facts and explain why this traffic concern is unfounded and that the circulation system for the Project will be effective to minimize any community traffic impact.

1. The Circulation Route for Drop-Off/Pickup. The circulation plan is attached as **Exhibit 1**. The vehicular circulation route is shown with red arrows on the graphic. Cars will travel southbound on Union, turn right into the alley and then circle around the parking lot south of the school building (and which is part of the project site). Cars will stop just before the alley for pick-up and drop-off of students. Students will be escorted by school monitors to the rear school entry, using the alley crosswalks shown on the graphic. The alley will remain open for other two-way traffic.

2. **Queue Capacity.** The circulation route provides a minimum onsite queue capacity for 15 cars with a single line of cars in the parking lot aisles (and, together with two cars in the alley, a total of 17 cars). The project traffic consultant, Linscott, Law and Greenspan, did a queue analysis as part of the traffic study for the project. It determined that the maximum queue at the "peak minute" during the morning drop-off will be 14 cars. It focused on the morning because the afternoon pick-up is more spread out, since some students stay for after-school activities. LLG has also advised that its analysis is conservative because, as required by LADOT, it is based on data for **private** schools, which involve a substantially lower percentage of students walking to school or carpooling than is the case here (as discussed below).

In response to resident concerns that cars could nonetheless back onto Union Avenue, we asked LLG to take a second look at the queue capacity for the Project. LLG determined, as shown on the graphic in **Exhibit 2**, that the 26-foot-wide drive aisle in the parking lot will easily accommodate two lines of cars, for a maximum onsite capacity of **31** cars. This is reflected in **Condition 14f**, which Equitas has volunteered in consultation with the Council office:

In the event that, during the pick-up or drop-off process, the onsite queueing is insufficient to accommodate all cars that have arrived at the subject property to pick up or drop off students and cars begin to queue onto Union Avenue, then monitors shall queue cars in a double line within the parking lot in order to accommodate up to 31 cars onsite.

Therefore, the onsite queue capacity would be more than double the maximum anticipated queue (which itself is a conservative estimate).

3. **Drop-Off/Pickup Process.** The drop-off and pickup times for each school will be staggered. Specifically, and as set forth in **Condition 14c**, (a) the drop-off periods for the two schools will be approximately 7:30-8:00 a.m. and 8:00-8:30 a.m. and (b) the pickup periods will be approximately 2:45-3:15 p.m. and 3:15-3:45 p.m.

While 30 minutes are conservatively allocated for each period, drop-off/pickup is expected to take only 15-20 minutes most of the time, consistent with Equitas' other Pico-Union schools. As required by **Condition 14d**, Equitas will employ a minimum of 10 monitors, consisting of school staff and parent volunteers, to ensure maximum efficiency and the safety of students.

A few residents were concerned that drop-off/pickup could impact them because there has sometimes been a long line of cars on Pico Boulevard to drop off and pick up Equitas 1 students, which has allegedly caused traffic disruption. First, that is an uncommon occurrence. Second, unlike Equitas 1, the circulation route for the Project is entirely onsite. Third, the queue capacity for the Project is much longer than for Equitas 1. Equitas is confident that the drop-off/pickup activity, as conditioned, will be compatible with and not adversely affect the surrounding neighborhood.

4. **Most Students Will Walk to School or Carpool.** As previously mentioned, several residents have expressed general concern that there could be 1,000 cars at the school

for short periods in the morning and afternoon since there will be 1,000 students. The reality is very different, for three principal reasons.

First, most students will not arrive by car, but will walk to school, escorted by parents. Based on Equitas data for its existing schools, including the existing Equitas Academy elementary school across the street, 70-75% of the students will walk to school.

Second, Equitas encourages carpooling at all of its schools and, in fact, Condition 14k requires it. Parents are motivated to form carpools so they do not have to drive their kids to school every day. Based on its experience at its other Pico-Union schools, there will often be 2-3 students in each car, including many siblings who will attend the schools.

Third, as previously noted, the drop-off and pickup period for each school will be staggered so that only half of the cars will arrive during each 30-minute period. This will further minimize the number of cars at the school at any given time during the overall pick-up and drop-off periods.

So, only a fraction of the suggested 1,000 cars will arrive during a drop-off/pickup period. For example, if you very conservatively assume that only 50% of students will walk to school, and that each car includes an average of two kids, that results in 250 cars, or 125 cars during each drop-off/pickup period. And, if the actual drop-off/pickup period is 20 minutes for each school, that translates to about six cars per minute ($125 \div 20$), which is very manageable and will not impose a burden on the surrounding neighborhood.

5. Equitas Has An Effective Enforcement System. Equitas has implemented an enforcement system at its existing schools to confront any parent who does not follow the circulation route for drop-off/pickup and require corrective action. That system is embodied in Condition 14. In response to input from residents and in consultation with the Council office, Condition 14 includes enhancements to that system. In particular, one staff member will be specially employed and trained to serve as a "traffic ambassador" to oversee drop-off/pickup operations, prevent violations of the drop-off/pickup rules and serve as the first point of contact for the community (see Conditions 14d, e, f and k). In addition, Condition 15 requires a 24-hour hotline to respond to any community concerns.

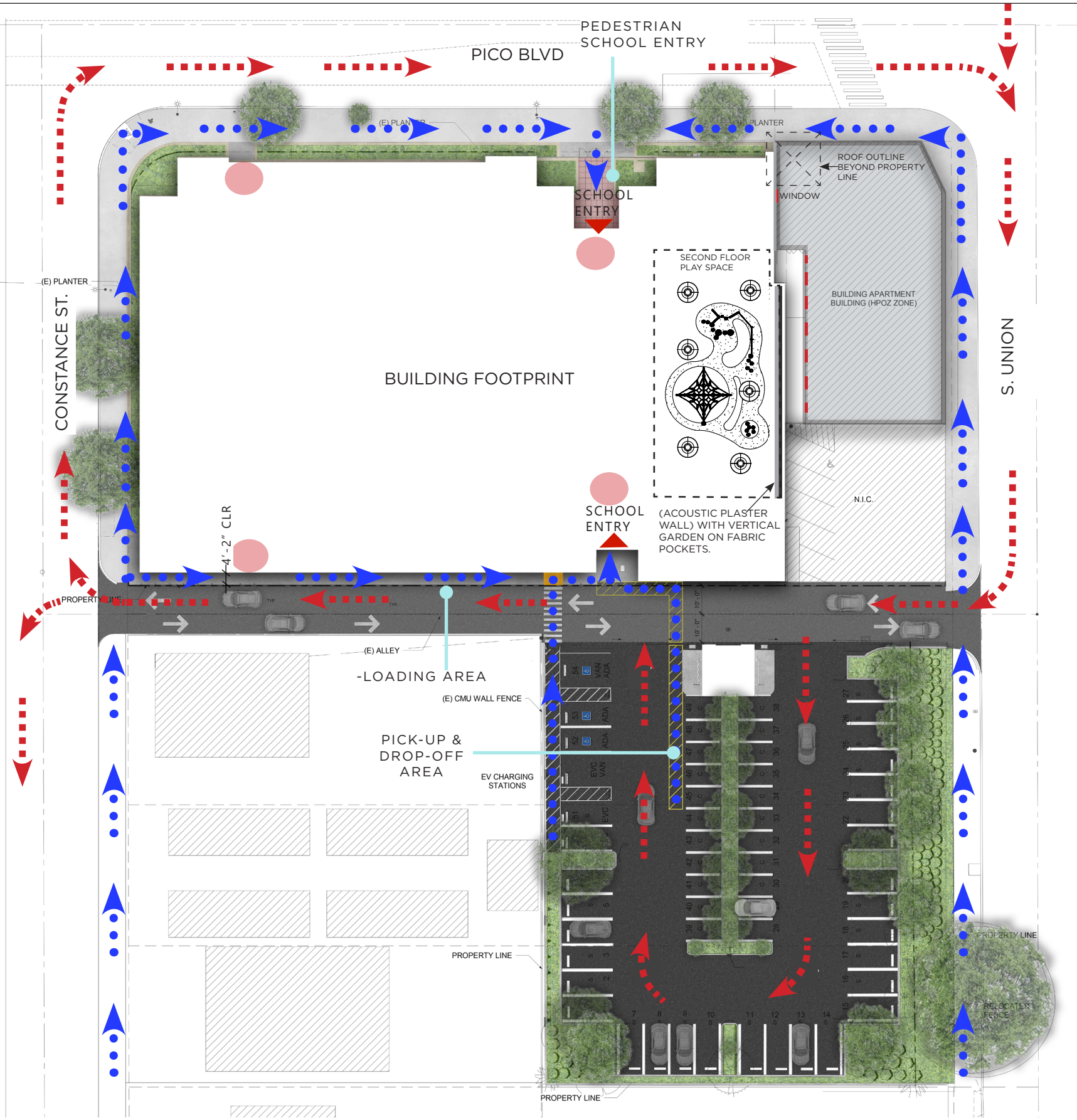
For all of these reasons, the surrounding community will not be adversely impacted by the relatively brief student drop-off/pick-up in the morning and afternoon. We respectfully ask that the Commission approve the requested entitlements for the Project.

Very truly yours,



Jack H. Rubens
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

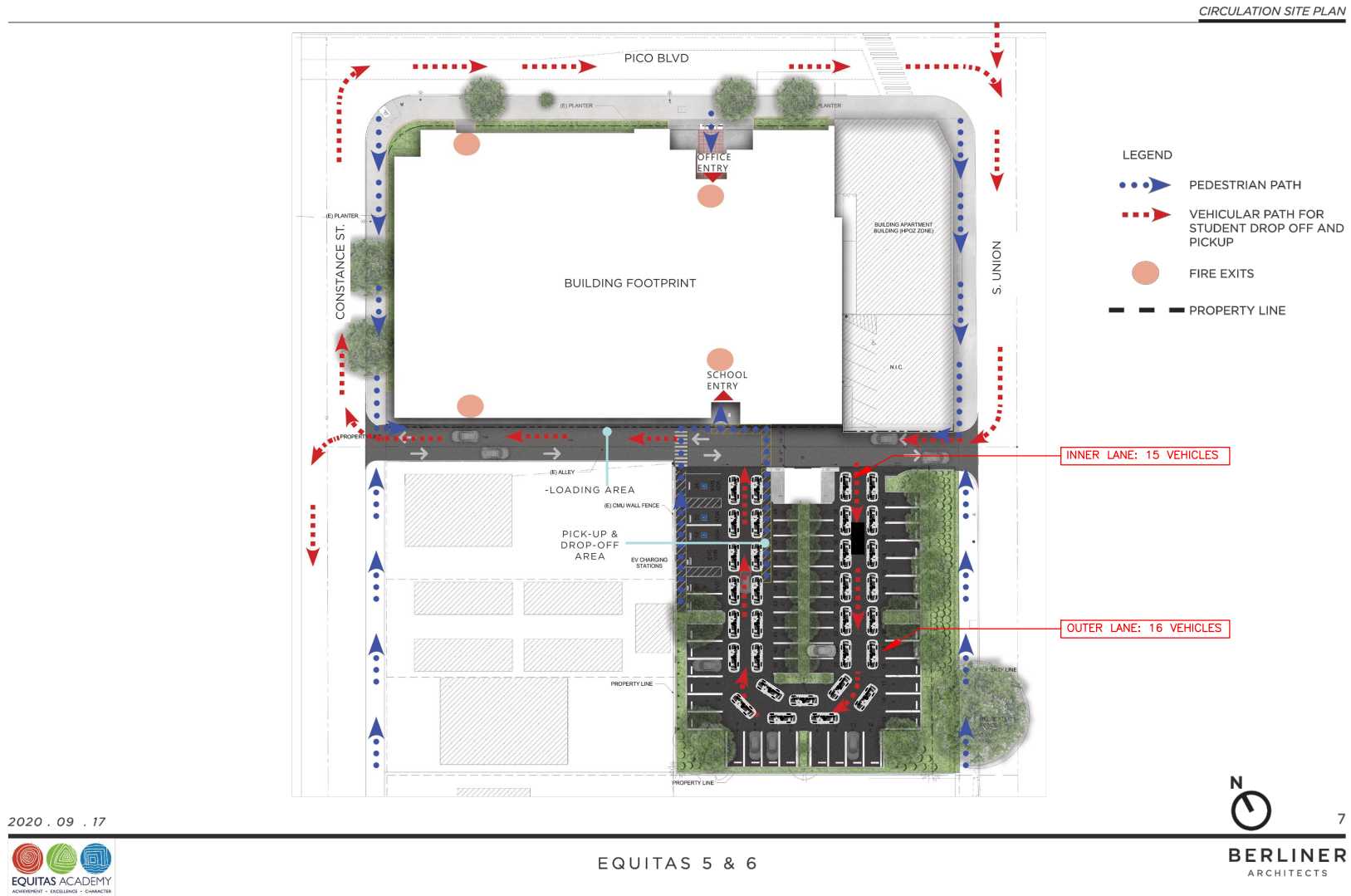
EXHIBIT 1



- LEGEND
- PEDESTRIAN PATH
 - VEHICULAR PATH FOR STUDENT DROP OFF AND PICKUP
 - FIRE EXITS
 - PROPERTY LINE

EXHIBIT 2

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MAP SOURCE: BERLINER ARCHITECTS

FIGURE 2-3
PROJECT CIRCULATION PLAN

LINSCOTT, LAW & GREENSPAN, engineers

EQUITAS 5-6 ELEMENTARY SCHOOLS PROJECT



November 12, 2020

BY EMAIL

Los Angeles City Planning Commission
City of Los Angeles
200 N. Spring Street, Room 272
Los Angeles, California 90012
Email: cpc@lacity.org
File Number: 65WY-307331

Re: Equitas Academy 5 & Equitas Academy 6 Elementary
Schools Project (CPC-2020-4095-ZV-CU-SPR)

Honorable President and Commissioners:

Growing up in Pico Union, I saw the need for more educational opportunities for my community. As a result, I committed to creating schools that enable our students to have the skills necessary to graduate college. When I began my work, the college graduation rate was 5% in Pico Union. The data compelled me to work to transform the Pico Union community into a place where families could access excellent educational experiences. The first of Equitas Academy Charter Schools was founded in 2009, with one Kindergarten-1st grade school. Since then, Equitas Academy Charter Schools has employed a “slow-growth” model, expanding to a family of elementary and middle schools, with six schools operating in 2020-2021. This project proposal will serve as the permanent home for Equitas Academy 5 and Equitas Academy 6. I am proud that Equitas Academy's academic performance outperforms similar student comparisons across Pico Union, the district and state and is on the path to ensure that our alumni enter and graduate from colleges and universities across the country.

Equitas Academy's Charter Schools' growth commitment is to serve over 25% of elementary and middle school students in the area, and to eventually operate eight campuses that will serve over 3,750 students in Pico Union. Our 2020-2021 enrollment totals 1,962 students in grades TK-8 and is expected to reach full enrollment of 2,881 students in FY 2024-2025. The Los Angeles Unified School District has authorized our schools to operate in Pico Union through an intensive approval process and the District conducts annual oversight. The current waitlist to enroll in our schools exceeds our available seats by a ratio of 3:1. The tremendous demand for the education that we provide is what compels us to keep growing. This further affirms the need for our schools and validates the acknowledgment from the community that our schools are exceptional.



Our facility strategy ensures that we honor the community by developing facilities that are deserving of the community we serve. We have committed to prioritizing the development of sites that do not displace residents or small businesses, are adaptive reuse locations with minimal construction impact and which have sufficient square footage. The proposed project at 1612 W. Pico is the best available site that meets all of our facility criteria. Additionally, this location provides ample parking, outdoor and indoor space and revitalizes a building that had been vacant for over two years and a haven for drug and alcohol use, vandalism and illegal dumping.

We have committed to proactive and meaningful community engagement throughout the entitlement process for Equitas Academy 5 and Equitas Academy 6. We began with proactive communication with Council District 1. Then, based on the recommendation of the Council Office, we held two community forums. We thank Councilmember Gil Cedillo and his team for facilitating these community discussions, which surfaced the concerns of our community. The Council Office provided a roadmap for our partnership with our neighbors. We have listened to our neighbors' concerns, answered questions, and incorporated their suggestions into the project.

The overwhelming majority of our families reside in Council District 1. In fact, 70% of our families self-identify as "walkers" in their registration paperwork. We see this data reflected in our daily pickup and drop-off procedure. The proposed site mitigates impacts of traffic and parking on the neighboring community. Additionally, in consultation with the Council Office, we formulated specific conditions of approval to further minimize the impact of the drop-off and pickup from those families who carpool. Our commitment in this area led us to volunteer these conditions to City Planning staff. In particular, we are committed to continuing our effective valet practices to further limit traffic and parking impacts. We will augment our current practices to stagger the start and dismissal times for the two schools, implement a hotline to report concerns and designate a traffic ambassador who will ensure compliance with parking and traffic concerns and be visible in the neighborhood to facilitate an increase in communication and collaboration.

Our commitment to effective outreach to the community has included translating City documents related to the project, providing Spanish language interpretation at community forums, and creating for the community a bilingual website about the project which provides a COVID-19 safe, online platform for people to get project information and give feedback. Additionally, we have distributed over 300 bilingual flyers to the community about the community forums and City hearings to broaden accessibility.

We also had significant outreach to our community partners. We presented our plans for this project at the Byzantine Latino Quarter Pico Union Business Improvement District (BID).



They provided feedback and gave their unanimous support for the project. We have an open dialogue with the BID and are working together with members and fellow stakeholders in the BID for a safer, cleaner, and more viable community.

We also presented our project to the Pico Union Neighborhood Council on two separate occasions, first to the Zoning, Planning, and Land Use Committee and then to the General Board. Our full project team, including our Equitas Academy COO Maggie Ford, Equitas Academy 5 and Equitas Academy 6 principals, architects, land use attorney and community affairs liaisons, participated in both meetings, answering questions and noting suggestions from the community.

We also presented the proposed project to Pico Union Project, a local non-profit cultural arts center, with whom we have a long history of sharing resources and programming. They have actively and consistently been a community partner and are supporting our proposed project.

Our community outreach also included collaborating with Pico Union Housing Corporation, a local nonprofit which provides a variety of programs including job training and resident empowerment. Together we brainstormed and committed to collaborating on the following programs: hosting a book fair, providing cost-free space for programming from local community organizations, commissioning local artists to create murals to celebrate the culture of Pico Union and facilitating an annual food drive. Food insecurity has tremendously grown during COVID. We have already served 250,000 meals, since March 2020, to the Pico Union community as a part of our COVID-19 response efforts.

In summary, my commitment to the Pico Union community has always been at the forefront of the efforts of Equitas Academy Charter Schools. Our family of schools allows local access to a rigorous academic program for students in our community. This proposed site honors our commitment to the community by meeting all of our facility criteria, notably not to displace any residents or small businesses. Our ongoing collaboration with Council District 1 and community organizations will continue to demonstrate our commitment as a responsive community partner. Thank you again for your consideration of our application and we respectfully request your approval of the project entitlements.

Malka Borrego
Founder & CEO
Equitas Academy Charter Schools



November 10, 2020

Michelle Carter, City Planning Associate
michelle.carter@lacity.org

To whom it may concern,

We are writing to you in support of the proposed 72-unit development, including 7 dedicated Extremely Low Income units, at 1614 W. Temple St, cases DIR-2019-7519-TOC/ENV-2019-7520-CE. We urge the city to find the project Categorically Exempt from the provisions of CEQA. We also urge the city to grant the 60% Density Bonus as well as base and additional incentives:

- Increased FAR of 3.25:1
- Reduced parking requirements
- Yard setback requirements conforming to the RAS3 instead of R4 zone
- 20% decrease in Open Space

The greater Los Angeles region is facing a severe housing shortage, and this project is another step towards addressing the overwhelming need for more housing across Los Angeles, especially in Echo Park. . By creating new housing in this neighborhood, it will help to reduce issues of gentrification and displacement in other parts of the region. Abundant Housing LA believes that these housing challenges can only be addressed if everyone in the region does their part. Los Angeles needs to focus more attention on this critical problem and developments like this one are part of the solution. By investing in more housing, we make our communities safer, healthier, and more inclusive.

This project is a great opportunity to put homes near transit to continue to encourage multi-modal transit options. Metro Bus 10 and DASH Pico Union/Echo Park Route stop across the street, and schools and grocery stores are nearby. These homes are also being built right next to Echo Park park, and given the impact of climate change, homes being built near greenspaces are needed now more than ever.

It is great to see the developer using the Density Bonus program to bring both market rate and badly needed affordable housing to the city. Affordable housing programs that depend on a percentage of new construction being affordable need a lot of new construction to have an impact, and the city should work to increase the number of developers using the Density Bonus. This project is a good project for Los Angeles and for the region. Again, we urge the city to approve the density bonus and find the project Categorically Exempt from the provisions of CEQA.

Best Regards,

Tami Kagan-Abrams

Tami Kagan-Abrams
AHLA Projects Director

Roderick Hall

Roderick Hall
AHLA Organizing Director

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Patrick A. Perry
E-mail: pperry@allenmatkins.com
Direct Dial: 213.955.5504 File Number: 390411-00001/LA1217229.02

Via Electronic Mail

November 13, 2020

President Samantha Millman
Vice President Vahid Khorsand
Commissioner David H. Ambroz
Commissioner Caroline Choe
Commissioner Helen Leung
Commissioner Karen E. Mack
Commissioner Marc Mitchell
Commissioner Veronica Padilla-Campos
Commissioner Dana M. Perlman
City Planning Commission
City of Los Angeles
200 North Spring Street
Los Angeles, California 90012

Re: 1614-1626 West Temple Street - Case No. DIR-2019-7519-TOC

Dear President Millman and Members of the City Planning Commission:

This firm represents 1614 Temple, LLC ("1614 Temple"), owner of the property located at 1614-1626 West Temple Street (the "Property") and applicant for the above-referenced Case which was approved by the Director of Planning on June 19, 2020, but has been appealed and is scheduled for your consideration on November 19, 2020. As set forth in more detail below, the approved Project fully complies with the requirements of the Los Angeles Municipal Code ("LAMC") for approval of a Transit Oriented Community and is categorically exempt from environmental review pursuant to the requirements of the California Environmental Quality Act ("CEQA"). The appeals of the Director's Determination in this Case are accordingly without merit and should be denied.

A. The Project Fully Complies with All Applicable Requirements of the LAMC.

1614 Temple is a California limited liability company that has owned the Property since 2006. The Property is currently developed with two existing vacant commercial buildings and a surface parking lot, and 1614 Temple desires to redevelop the Property at this time because the existing structures have reached the end of their useful life. 1614 Temple intends to continue to own and operate the Property upon completion of construction.

The Project consists of the development of a new, six-story, 47,000 square-foot mixed-use building which includes 72 one-bedroom dwelling units, seven of which are set aside for Extremely Low Income Households (or nine percent of the proposed density), and 700 square feet of ground floor commercial space. The building will be constructed with five residential levels above one ground level of parking and commercial use and one level of subterranean parking. The Project also includes a total of 5,794 square feet of open space for residents.

President Samantha Millman
November 13, 2020

Page 2

The Project will provide a total of 72 automobile parking spaces, and eight short-term and 58 long-term bicycle parking spaces. Vehicular access to the Property is provided via two driveways. Ingress and egress for the street level parking garage will be provided from Temple Street, and ingress and egress for the subterranean parking garage will be provided from the abutting alley to the east. The two levels of parking are not connected to each other and need to be accessed separately either from Temple Street or from the alley. Pedestrian access is located on Temple Street.

The Property is zoned C2-1 and is located in the Los Angeles State Enterprise Zone. The Property is also located in Tier 2 of the Transit Oriented Communities Incentive Areas because it is less than 750 feet from the intersection of two non-Rapid Bus lines, each with at least a 15 minute average peak headway located at the intersection of Temple Street and Glendale Avenue. According to the Transit Oriented Communities Affordable Housing Incentive Program Guidelines ("TOC Guidelines"), a project located in Tier 2 that provides nine percent of the total number of residential units for Extremely Low Income Households is eligible for base incentives that consist of (i) an increase of up to 60 percent in the number of residential units, (ii) an increased floor area ratio ("FAR") of the greater of up to 45 percent or 3.25:1, and (iii) a reduction in the number of required automobile parking spaces to 0.5 space per bedroom up to a maximum of one space per unit and a reduction of up to 20 percent in the number of required spaces for nonresidential uses. By setting aside more than seven percent of the base density for households at the Extremely Low Income level, the Project is also entitled to request two additional incentives, which consist of the use of any or all yard requirements for the RAS3 zone and a 20 percent reduction in required open space.

According to the Project plans prepared by The Albert Group Architects dated December 13, 2019, the lot area of the Property is 17,059 net square feet, which may be increased to 18,269 square feet to include the 1,210 square feet of the area of one-half the width of the adjoining alley for purposes of computing residential density pursuant to Section 12.22C.16 of the LAMC. According to Sections 12.14C and 12.11C of the LAMC, the minimum lot area per dwelling unit in the C2 zone is 400 square feet. A total of 45 residential units would accordingly be permitted on the Property, which may be increased by 60 percent in accordance with the TOC Guidelines for projects located in Tier 2 that provide at least nine percent of the total dwelling units for Extremely Low Income Households. The allowable number of residential units is therefore 73 dwelling units, which exceeds the 72 dwelling units proposed for the Project.

According to Section 12.21.1A.1 of the LAMC, the allowable FAR for buildings on a lot in a commercial or industrial zone in Height District No. 1 may not exceed 1.5 times the buildable area of the lot, which may be increased in accordance with the TOC Guidelines up to 3.25:1 for projects located in Tier 2 that provide at least nine percent of the total dwelling units for Extremely Low Income Households. The allowable floor area for the Project is therefore 55,442 square feet, which exceeds the 47,000 square feet of floor area proposed for the Project.

Pursuant to the TOC Guidelines, 36 automobile parking spaces are required for the proposed dwelling units at 0.5 parking space for each of the one-bedroom units. According to Section 12.21A.4(x)(3)6 of the LAMC, one automobile parking space is required for every 500 square feet of commercial floor area located in an Enterprise Zone, which may be decreased pursuant to the TOC Guidelines by 20 percent for ground floor nonresidential uses in Tier 2. Two automobile parking spaces are therefore required for the proposed 700 square feet of commercial use. A total 68 automobile parking spaces are proposed for the Project, which includes 66 spaces for the residential units and two spaces for the proposed ground floor commercial use, which meets or exceeds applicable requirements.

According to Section 12.21A.16 of the LAMC, one short term bicycle parking space is required for every 10 units of the first 25 dwelling units, and one short term bicycle parking space is required for every 15 units of the next 26 to 100 dwelling units. One long term bicycle parking space is required for each of the first 25 residential units, and one long term bicycle parking space is required for every 1.5 residential units for the next 26 to 100 dwelling units. A minimum of two short term and two long term bicycle spaces are required for commercial uses with less than 2,000 square feet. A total of eight short term and 58 long term bicycle parking spaces are therefore required for the Project. A total of 62 long term and eight short term bicycle parking spaces are provided, which meets or exceeds applicable requirements.

President Samantha Millman
November 13, 2020

Page 3

According to the TOC Guidelines, a project in Tier 2 that includes at least seven percent of the base units for Extremely Low Income Households is eligible to receive two additional incentives subject to approval by the Director of Planning. According to Sections 12.22A.31(e) and 12.22A.25(g) of the LAMC, such incentives must be approved unless the Director finds that (i) the incentives are not required in order to provide for affordable housing costs as defined in California Health and Safety Code Section 50052.5, or Section 50053 for rents for the affordable units, or (ii) the incentive will have a specific adverse impact upon public health and safety or the physical environment or on any real property that is listed in the California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the specific adverse impact without rendering the development unaffordable to Very Low, Low and Moderate Income households. Here, no evidence has been provided to indicate that the incentives are not required in order to provide for affordable housing costs or that the incentive will result in a specific adverse impact upon public health and safety or the physical environment or on any real property that is listed in the California Register of Historical Resources. The Director accordingly approved two additional incentives for the Project from the menu of permissible incentives set forth in the TOC Guidelines.

Permissible incentives for projects located in commercial zones Tier 2 include use of setback requirements for the RAS3 zone and a 20 percent reduction in the amount of required open space. According to Section 12.10.5 of the LAMC, the following setbacks are required in the RAS3 zone:

Front Yard :	five feet
Side yard:	five feet for all portions of buildings erected and used for residential purposes
Rear yard:	five feet when property is not located adjacent to property zoned RD or more restrictive

In addition, Section 12.22A.18(c)(3) provides that setbacks are not required for residential portions of buildings located on lots in the C2 zone used for combined commercial and residential uses, if such portions are used exclusively for residential uses, abut a street, private street or alley, and the first floor of such buildings at ground level is used for commercial uses or for access to the residential portions of such buildings. Surrounding properties are zoned C2 and R4, which are not more restrictive than the RD zone. The Project accordingly maintains the applicable front and rear yard setbacks of five feet, a side yard setback of five feet for the residential portion of the building along the westerly property line, and no setback along the easterly property line adjacent to the alley, all in conformance with RAS3 requirements permitted as an additional incentive pursuant to the TOC Guidelines.

According to Section 12.21G of the LAMC, 100 square feet of open space is required for every dwelling unit with less than three habitable rooms. Each of the proposed dwelling units in the Project will have less than three habitable rooms. The Project is accordingly required to include a total of 7,200 square feet of open space, which may be reduced by 20 percent to 5,760 square feet in accordance with the TOC Guidelines. The Project proposes to include 5,794 square feet of open space, which exceeds applicable requirements pursuant to the TOC Guidelines.

B. The Project Is Categorically Exempt from CEQA Review.

According to the Director's Determination, the Project is categorically exempt from CEQA review pursuant to Section 15332 (In-Fill Development Projects) of the CEQA Guidelines (California Code of Regulations, Title 14, §§ 15000 *et seq.*). The Director's Determination further found that there is no substantial evidence to demonstrate that an exception to the categorical exemption pursuant to Section 15300.2 of the CEQA Guidelines applies.

CEQA applies to "discretionary projects proposed to be carried out or approved by public agencies, including, but not limited to, the enactment and amendment of zoning ordinances, the issuance of zoning variances, the issuance of conditional use permits, and the approval of tentative subdivision maps unless the project is exempt from this division." (Public Resources Code ("PRC") § 21080(a).) CEQA does not apply to "[m]inisterial projects proposed to be carried out or approved by public agencies." (PRC § 21080(b)(1).) Section 15369 of the CEQA Guidelines defines a

President Samantha Millman
November 13, 2020

Page 4

ministerial decision as one that "involves only the use of fixed standards or objective measurements, and the public official cannot use personal, subjective judgment in deciding whether or how the project should be carried out." According to the TOC Guidelines and Section 12.22A.31 of the LAMC, the base incentives for residential density and reduced parking "shall be granted" to eligible housing developments. Granting such incentives is accordingly ministerial, and the only decision requiring discretion, and thereby subject to CEQA at all, is whether to grant the additional incentives regarding reductions to setbacks and open space.

Section 21084(a) of the PRC requires the CEQA Guidelines to include "a list of classes of projects that have been determined not to have a significant effect on the environment and that shall be exempt from this division. In adopting the guidelines, the Secretary of the Natural Resources Agency shall make a finding that the listed classes of projects referred to in this section do not have a significant effect on the environment." The CEQA Guidelines accordingly include a list of exemptions at Sections 15300 et seq.

Section 15332 of the CEQA Guidelines provides a categorical exemption for in-fill development meeting the following conditions:

- a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.
- b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.
- c) The project site has no value, as habitat for endangered, rare or threatened species.
- d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.
- e) The site can be adequately served by all required utilities and public services.

Section 15300.2 of the CEQA Guidelines identifies relevant exceptions to the application of a categorical exemption, which include the following:

1. when the cumulative impact of successive projects of the same type in the same place, over time is significant.
2. there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.
3. the project may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway.
4. the project is located on a site which is included on any list of hazardous waste sites compiled pursuant to Section 65962.5 of the Government Code.
5. the project may cause a substantial adverse change in the significance of a historical resource.

As described below, substantial evidence clearly supports the decision that the Project falls within the categorical exemption set forth in Section 15332 of the CEQA Guidelines, and there is no evidence to establish that any of the exceptions to the categorical exemption applies.

The determination that a categorical exemption applies will be upheld if it is supported by substantial evidence. (*See, Aptos Residents Association v. County of Santa Cruz* (2018) 20 Cal.App.5th 1039, 1046 ["Although categorical exemptions are construed narrowly, our decision that a project falls within a categorical exemption is deferential, and we determine only whether that decision is supported by substantial evidence."].) "The Secretary, in complying with the Legislature's command to determine the 'classes of projects' that 'do not have a significant effect on the environment' (§ 21084, subd. (a)), necessarily resolved any number of 'fair arguments' as to the possible environmental effects of projects in those classes. Allowing project opponents to negate those determinations based on nothing more than 'a fair argument that the project will have significant environmental effects' . . . would be fundamentally inconsistent with the

President Samantha Millman
November 13, 2020

Page 5

Legislature's intent in establishing the categorical exemptions." (*Berkeley Hillside Preservation v. City of Berkeley* (2015) 40 Cal.4th 1086, 1106 ("*Berkeley Hillside*").) "As to projects that meet the requirements of a categorical exemption, a party challenging the exemption has the burden of producing evidence supporting an exception." (*Id.* at 1105.) Here, the determination that the Project falls within the Class 32 categorical exemption is clearly supported by substantial evidence, and there is no evidence, substantial or otherwise, that an exception applies.

The Property is designated Highway Oriented Commercial in the Westlake Community Plan, which is a component of the City of Los Angeles General Plan. Zoning designations that are consistent with the Highway Oriented Commercial designation include C2, C1, CR, RAS3, RAS4, and P. The Property is zoned C2, which is consistent with the Community Plan land use designation. Permitted uses in the C2 zone include a range of commercial uses as well as multi-family residential uses consistent with the requirements of the R4 zone. Section 12.22A.31 of the LAMC provides for various incentives for the inclusion of affordable dwelling units in proposed housing development projects in accordance with the TOC Guidelines. As described above, the Project consists of 72 residential units, seven (i.e., nine percent) of which will be set aside for Extremely Low Income Households. The Project therefore qualifies under the TOC Guidelines for the proposed base incentives consisting of increased residential density, increased floor area, and reduced parking as a matter of right. The Project is also eligible for the proposed additional incentives of reduced setbacks and open space subject to approval by the Director of Planning. The Project is accordingly consistent with the General Plan and zoning designations.

The Property is located within the city limits of the City of Los Angeles and is 17,067 square feet, or approximately 0.4 acres, in area. The Property is currently developed with two one-story commercial buildings and associated surface parking lots and therefore has no value as habitat for endangered, rare, or threatened species. Moreover, as set forth in the Findings Supporting Categorical Exemption prepared for the Department of City Planning by EcoTierra Consulting, Inc. dated June 2020 (the "CEQA Findings"), the Project will be adequately served by all required utilities and public services, including water, wastewater, solid waste disposal, natural gas, electricity, fire protection, police protection, schools, parks, and libraries. The CEQA Findings also establish on the basis of substantial evidence that the Project will not result in any significant effects relating to traffic, noise, air quality, or water quality.

With regard to the cumulative impacts exception, there is no evidence that the Project, in conjunction with successive projects of the same type in the same place over time will result in any significant effects. The Transportation Assessment for the Project prepared by Crain & Associates dated November 2019 concluded that Project traffic along with the traffic associated with 11 related projects in proximity to the Property and an annual ambient growth factor of 1.0 would not result in a cumulative traffic impact. The CEQA Findings similarly considered the cumulative impacts of the Project in the areas of land use and planning, endangered, rare or threatened species, noise, air quality, greenhouse gases, water quality, utilities, public services, and historical resources and similarly concluded that the impacts of the Project would not be cumulatively considerable in conjunction with the impacts of other projects.

With respect to the unusual circumstances exception, "it is not enough for a challenger merely to provide substantial evidence that the project may have a significant effect on the environment, because that is the inquiry CEQA requires absent an exemption." (*Berkeley Hillside*, at 1105.) The Court in *Berkeley Hillside* accordingly established a "bifurcated approach to the questions of unusual circumstances and potentially significant effects." (*Id.* at 1115.) "We conclude that both prongs of [PRC] section 21168.5's abuse of discretion standard apply on review of an agency's decision with respect to the unusual circumstances exception. The determination as to whether there are 'unusual circumstances' . . . is reviewed under section 21168.5's substantial evidence prong. However, an agency's finding as to whether unusual circumstances give rise to 'a reasonable possibility that the activity will have a significant effect on the environment' . . . is reviewed to determine whether the agency, in applying the fair argument standard, 'proceeded in [the] manner required by law.'" (*Id.* at 1114.) Thus, in determining whether "a particular project presents circumstances that are unusual for projects in an exempt class is an essentially factual inquiry, . . . and a reviewing court should apply the traditional substantial evidence standard that section 21168.5 incorporates." (*Id.*) However, "when there are 'unusual circumstances,' it is appropriate for agencies to apply the fair argument standard in determining whether 'there

President Samantha Millman
November 13, 2020

Page 6

is a reasonable possibility [of] a significant effect on the environment due to unusual circumstances.' . . . As to this question, the reviewing court's function 'is to determine whether substantial evidence support[s] the agency's conclusion as to whether the prescribed "fair argument" could be made.'" (*Id.* at 1115, quoting *Friends of "B" Street v. City of Hayward* (1980) 106 Cal.App.3d 988, 1002.)

In this case, there is substantial evidence that there are no unusual circumstances. However, even if there were unusual circumstances, there is no substantial evidence to support a fair argument that the Project would have an impact on the environment due to such unusual circumstances. The Property is currently developed with commercial uses in an urban environment and is zoned C2. Surrounding properties are zoned C2 and R4 and are developed with commercial and single and multi-family residential uses. As set forth above, the Project complies with applicable requirements of the LAMC and the TOC Guidelines and will not result in any significant effects relating to traffic, noise, air quality, or water quality.

Nor is there any evidence to support a fair argument that even if there were any unusual circumstances, such circumstances would result in a significant effect on the environment. Substantial evidence "includes fact, a reasonable assumption predicated upon fact, or expert opinion supported by fact." It does not include "argument, speculation, unsubstantiated opinion or narrative," or "evidence that is clearly inaccurate or erroneous." (PRC § 21080(e).) No evidence, substantial or otherwise, has been provided to demonstrate that even if there were any unusual circumstances associated with the Project, of which there are none, that there is a reasonable possibility that the Project will result in a significant effect on the environment due to such unusual circumstances.

Nor is there any evidence that the Project may result in damage to scenic resources within an officially designated scenic highway or cause a substantial adverse change in the significance of a historical resource because there are no state or locally designated scenic highways in proximity to the Property, and there are no identified historical resources on the Property that would be affected by the development of the Project.

The Property similarly is not included on any list of hazardous waste sites compiled pursuant to Section 65962.5 of the Government Code. According to the Phase I Environmental Site Assessment prepared for the Property by SESPE Consulting dated November 2019, the Property is not included in any of the databases of contaminated properties, properties under assessment for contamination, permitted facilities, and related listings maintained by regulatory agencies with jurisdiction over hazardous waste sites.

Based on the foregoing, the Project is categorically exempt from CEQA review as an in-fill development project pursuant to Section 15332 of the CEQA Guidelines.

C. The Project Complies with All Objective Standards and Criteria and May Not Be Denied or Reduced in Density.

Section 65589.5 of the California Government Code, otherwise known as "the Housing Accountability Act . . . and . . . referred to colloquially as the 'Anti-NIMBY Law,'" has been interpreted by California courts as an effort to restrict "an agency's ability to use what might be called 'subjective' development 'policy' (for example, "suitability") to exempt a proposed housing development project from the reach of [Government Code § 65589.5(j)]." (*Honchariw v. County of Stanislaus* (2011) 200 Cal.App.4th 1066, 1069, 1076).

Section 65589.5(j) of the Government Code provides that when a proposed housing development project complies with applicable, **objective** general plan, zoning and subdivision standards and criteria—including design review standards—that are in effect at the time that the housing development project's application is determined to be complete, a local agency may not disapprove the project or require the project to be developed at a lower density unless the local agency makes written findings supported by the preponderance of the evidence that (1) the housing development project would have a specific adverse impact upon the public health and safety, and (2) there is no feasible

President Samantha Millman

November 13, 2020

Page 7

method to satisfactorily mitigate or avoid the identified adverse impact. Section 65589.5(a)(3) of the Government Code states the intent of the Legislature that "the conditions that would have a specific, adverse impact upon the public health and safety, as described in [Section 65589.5(j)] arise infrequently." Section 65589.5(h)(2)(A) of the Government Code defines "housing development project" as a mixed-use use development consisting of residential and nonresidential uses with at least two-thirds of the square footage designated for residential use.

The proposed Project consists of residential and nonresidential uses with more than two-thirds of the floor area designated for residential use and fully complies with all objective general plan, zoning and subdivision standards and criteria. The Project therefore may not be disapproved or required to be developed at a lower density absent specific findings that the Project would have a specific adverse impact on public health and safety and that there is no feasible method to satisfactorily mitigate or avoid that adverse impact. There is no evidence, much less a preponderance of evidence, to support a finding that the proposed Project would result in a specific adverse impact on public health and safety. The Project must therefore be evaluated on the basis of the applicable objective general plan and zoning standards in accordance with the requirements of State law, and approved as proposed on the grounds that it fully complies with all such standards as set forth above.

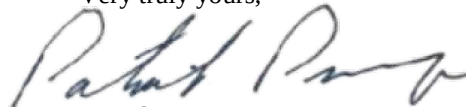
D. Response to Appeals.

Detailed responses to specific issues raised by the various appellants are provided in the attached Appendix A. Please note that as shown in the timeline attached as Appendix B, representatives of 1614 Temple have reached out to the appellants multiple times over the past five months in a good faith effort to address their concerns. 1614 Temple has also offered to implement the additional measures identified in Appendix C. To date, the appellants have failed to accept these additional measures or propose alternate measures that would address their perceived concerns.

E. Conclusion.

For the foregoing reasons, you are respectfully requested to deny the appeals and approve the Project as proposed. Your careful attention to this request is greatly appreciated. Please do not hesitate to contact me with any questions or if I can provide any additional information with regard to the issues set forth above.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Patrick Perry", written in a cursive style.

Patrick A. Perry

PAP

Case No. DIR-2019-7519-TOC
Appendix A: Summary of Appeal Responses

Appeal Point 1 - Traffic

An evaluation of the Project's impacts under LADOT's identified metrics in The Transportation Assessment for the Project prepared by Crain & Associates dated November 2019 established that there would be no significant transportation related impacts.

Appeal Point 2 – Unusual Circumstance

Project does not fall within any of the exceptions within Section 15300.2 of the CEQA Guidelines and can utilize the Class 32 Categorical Exemption. The proposed land uses are consistent and compatible with the Property's urban setting and are typical for an infill development located near transit and on a major City thoroughfare. Additionally, the adequacy of parking for a project, in and of itself, is not an environmental impact. (See Public Resources Code, § 21099(b)(3).)

Appeal Point 3 - Privacy and Sunlight

The City's Zoning Information (ZI) No. 2452 states that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA."

Appeal Point 4 – Air and/or Noise Pollution

Both the Air Quality Impact Analysis and the Environmental Noise Impact Analysis found that the Project construction activities and operational impacts would be less than significant. The Appellant has provided no substantial evidence to contradict the conclusions of the air quality and noise analysis provided. The Applicant has also committed that the parking garage will be vented in a manner that does not project the garage's air in the direction of residential properties abutting the site and will implement significant noise control measures (see Appendix C).

Appeal Point 5 - Vibration

Memorandum Analysis for Vibration Analysis prepared by EcoTierra Consulting, Inc. dated October 22, 2020, concluded that that impacts to buildings in the Project's vicinity related to construction vibration resulting from the Project would be less than significant.

Appeal Point 6 – Incentives Not Necessary for Affordable Housing

The list of incentives in the TOC Guidelines were pre-evaluated at the time the TOC Ordinance was adopted. As a result of the prescribed incentives, it is likely that the Director will always conclude that the incentives are required for such projects to provide for affordable housing units as identified by the TOC Guidelines.

Appeal Point 7 - Historic

The Project site is not within a Historic Preservation Review area, a Historical Preservation Overlay Zone, or identified as an eligible resource by Survey LA; or as a City Historic-Cultural Monument. Moreover, the Project site is not listed as a historical resource in national or State registries. Based upon this analysis, the Lead Agency determined that the proposed Project would not result in a substantial adverse change to a historic resource.

Appeal Point 8 – Potential Groundwater Contamination

A Phase I Environmental Site Assessment (ESA) was performed by SESPE Consulting, Inc. in November 2019. The reconnaissance of the Project Site identified no obvious recognized environmental conditions (RECs) affecting the Project Site.

CASE NO. DIR-2019-7519-TOC
APPENDIX B – NEIGHBOR CONTACTS

Date	Time	Type	From	Property Address	To/Participants
06/22/20		Email	Edwin Akoubians	1633 Cortez Street	Michael Cho
06/23/20		Phone	Damian Pelliccione	1633 Cortez Street	Michael Cho
06/24/20	3:43 PM	Email	Louis Heilbron	1633 Cortez Street	Edwin Akoubians
06/24/20	3:47 PM	Email	Edwin Akoubians	1633 Cortez Street	Louis Heilbron
06/26/20	2:30 PM	ZOOM Call	(see participants)	1633 Cortez Street	Rodriguez ; Edwin Akoubians; Gregory Gershuni; Louis Heilbron
06/30/20	4:00 PM	ZOOM Call	(see participants)	1633 Cortez Street	Damian Pelliccione; Christopher Rodriguez ; Edwin Akoubians; Gregory Gershuni; Louis Heilbron
07/01/20	3:36 PM	Email	Damian Pelliccione	1633 Cortez Street	Gregory Gershuni
07/02/20	5:00 PM	ZOOM Call	N/A	1633 Cortez Street	Rodriguez ; Edwin Akoubians; Gregory Gershuni; Louis Heilbron
07/21/20	12:00 p.m.	Phone		1604 Temple Street	Stephen Jamieson and Patrick Perry
07/21/20	2:28 p.m.	Email	Patrick Perry	1604 Temple Street	Stephen Jamieson
08/07/20	5:55 p.m.	Email	Stephen Jamieson	1604 Temple Street	Patrick Perry
08/07/20	6:03 p.m.	Email	Patrick Perry	1604 Temple Street	Stephen Jamieson
08/10/20	3:30 p.m.	Phone call	Patrick Perry	1604 Temple Street	Stephen Jamieson
08/12/20	1:55 p.m.	Email	Stephen Jamieson	1604 Temple Street	Patrick Perry
08/18/20	6:12 p.m.	Email	Patrick Perry	1604 Temple Street	Stephen Jamieson
08/18/20	7:01 p.m.	Email	Stephen Jamieson	1604 Temple Street	Patrick Perry
08/19/20	8:58 a.m.	Email	Patrick Perry	1604 Temple Street	Stephen Jamieson
08/20/20	11:46 a.m.	Email	Patrick Perry	1604 Temple Street	Stephen Jamieson
08/21/20	12:22 p.m.	Email	Patrick Perry	1604 Temple Street	Stephen Jamieson
08/21/20	1:47 p.m.	Email	Stephen Jamieson	1604 Temple Street	Patrick Perry
08/23/20	2:06 p.m.	Email	Stephen Jamieson	1604 Temple Street	Patrick Perry
08/25/20	2:35 p.m.	Email	Patrick Perry	1604 Temple Street	Stephen Jamieson
09/03/20	2:11 p.m.	Email	Patrick Perry	1604 Temple Street	Stephen Jamieson
09/14/20	9:15 a.m.	Email	Patrick Perry	1604 Temple Street	Stephen Jamieson
09/14/20	10:30am	Phone Call	Miguel Siqueiros and Emmanuel Sanchez- Ramos	1625 Cortez	Aaron Green
09/15/20		Phone call	Patrick Perry	1604 Temple Street	Stephen Jamieson
09/21/20	1:28 PM	Email	Louis Heilbron	1604 Temple Street	S. Smith
09/30/20	5:11 p.m.	Email	Stephen Jamieson	1604 Temple Street	Patrick Perry
10/01/20	8:30AM	Phone Call	Damian Pelliccione & Christopher Rodriguez	1633 Cortez Street	Aaron Green
10/01/20	9:31AM	Email	Damian Pelliccione	1633 Cortez Street	Aaron Green
10/01/20	5:14 p.m.	Email	Patrick Perry	1604 Temple Street	Stephen Jamieson
10/05/20	8:59AM	Email	Jason Chan (City Planning)		Aaron Green, Damian Pelliccione & Christopher Rodriguez
10/13/20	9:58 a.m.	Email	Patrick Perry	1604 Temple Street	Stephen Jamieson
10/19/20	3:09pm	Email	Aaron Green	multiple	Damian Pelliccione, Christopher Rodriguez, Arnulfo Rodriguez Perez, Joshua Moreno, Miguel Siqueiros
10/19/20	7:19pm	Emails	Damian Pelliccione	1633 Cortez Street	Aaron Green
10/19/20	7:44 p.m.	Email	Stephen Jamieson	1604 Temple Street	Patrick Perry and Craig Lawson
10/20/20	NA	Letters	Aaron Green	multiple	Damian Pelliccione, Christopher Rodriguez, Arnulfo Rodriguez Perez, Joshua Moreno, Miguel Siqueiros
10/20/20	10:15am	Email	Miguel Siqueiros; Emmanuel Sanchez- Ramos	1625 Cortez	Aaron Green
10/20/20	10:21 am	Email	Aaron Green	1633 Cortez Street	Damian Pelliccione
10/21/20	10:30am	phone	Aaron Green	1627 Cortez	Joshua Moreno
10/22/20	10:10 a.m.	Email	Patrick Perry	1604 Temple Street	Stephen Jamieson and Craig Lawson
11/02/20	11:10 AM	Email	Damian Pelliccione	1633 Cortez Street	Louis Heilbron
11/02/20	4:56 p.m.	Email	Sally Whittaker	1604 Temple Street	Patrick Perry and Craig Lawson
11/05/20	12:23 p.m.	Email	Patrick Perry	1604 Temple Street	Stephen Jamieson
11/06/20	12:00 p.m.	Phone call	Patrick Perry	1633 Cortez Street	Jordan Sisson
11/07/20	1:40 p.m.	Email	Stephen Jamieson	1604 Temple Street	Patrick Perry
11/10/20	1:35 p.m.	Email	Patrick Perry	1604 Temple	Stephen Jamieson
11/12/20	10:57 a.m.	Email	Patrick Perry	1633 Cortez Street	Jordan Sisson
11/12/20	11:29 a.m.	Email	Stephen Jamieson	1604 Temple Street	Patrick Perry
11/12/20	1:50 p.m.	Email	Patrick Perry	1604 Temple Street	Stephen Jamieson
11/12/20	4:00 p.m.	Phone call	Patrick Perry	1633 Cortez Street	Jordan Sisson

CASE No. DIR-2019-7519-TOC
APPENDIX C: MEASURES TO BE IMPLEMENTED DURING CONSTRUCTION

1. The Developer shall provide property owners and tenants of abutting residential properties with written notice of the intent to start construction at least 14 days prior to the commencement of substantial construction activities.
2. A construction relations officer will be appointed to act as a community liaison concerning on-site construction activity.
3. A 24-hour contact phone number will be posted onsite for the reporting of any security or construction problems.
4. Construction fence will be maintained throughout the duration of construction.
5. Construction workers will be prohibited from parking in the residential neighborhood adjacent to the Project site.
6. For construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, etc.), the contractors will conduct those activities as far away as possible from residential neighbors.
7. The Developer will monitor and remove graffiti within 48 hours of discovery during the construction period.
8. The Developer will prohibit lunch trucks from parking anywhere except on the Project site.
9. During construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site.
10. The Developer will provide wheel washers for vehicles exiting the site and will sweep the alley at the end of each day during construction.
11. All active portions of the construction site shall be sufficiently watered at least three times per day to reduce/prevent dust.
12. Vehicles hauling dirt from the Project site will be water-sprayed to control fugitive dust, shall be required to cover all loads and shall maintain at least six inches of freeboard for all loads.
13. Security cameras will be installed at each corner of the Project site to provide visual coverage of the entire Project site.
14. There will be no staging of hauling or delivery trucks on neighboring residential streets.
15. No construction work shall occur on Sundays or designated City, state, or federal holidays.

50+ CONSTITUENTS SUBMITTED THE FOLLOWING STATEMENT FOR YOUR CONSIDERATION:

Dear Los Angeles City Planning Commission,

It is my pleasure to provide this letter of support for the 1614 Temple Project, a development of 72 homes for residents in Echo Park. The City Application number is DIR-2019-7519-TOC.

With the new construction of 72 homes, 7 of which are reserved for extremely low-income households, this is another step towards continue to address the overwhelming need for creating more housing for people across Los Angeles, especially in Echo Park. Not only is this a net gain of 72 homes, but it's also an opportunity to put homes near transit to continue to encourage multi-modal transit options. Lastly, these homes are being built right next to a park and given the impact of climate change, homes being built near green spaces are needed now more than ever.

I strongly support this project because it will house people in great need, including those who are extremely low-income. Los Angeles needs to focus more attention on this critical problem and developments like this one are part of the solution. By investing in more housing, we make our communities safer, healthier, and more inclusive.

Personally sent by (SEVERAL CONSTITUENTS) using Abundant Housing LA's Advocacy Tool. AHLA is a grassroots pro-housing organization.



Planning CPC <cpc@lacity.org>

Fwd: 1614 West Temple Support

Michelle Carter <michelle.carter@lacity.org>
To: Planning CPC <cpc@lacity.org>

Fri, Nov 13, 2020 at 1:41 PM



Michelle Carter
City Planning Associate
Los Angeles City Planning
200 N. Spring St., Room 763
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1262



Regular Day Off: Every other Friday

----- Forwarded message -----

From: **Anna Vidal** <anna.vidal@lacity.org>
Date: Fri, Nov 13, 2020 at 1:40 PM
Subject: Fwd: 1614 West Temple Support
To: Michelle Carter <michelle.carter@lacity.org>

FYI.



Anna M. Vidal
Preferred Pronouns: She/her/hers
City Planner
Los Angeles City Planning
201 N. Figueroa St., 4th floor
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 482-7079 | F: (213) 482-0443
RDO 2nd Fridays. Holidays: Nov. 26 & 27



----- Forwarded message -----

From: **David Falcon** <dalconfavid@gmail.com>
Date: Tue, Nov 3, 2020 at 1:29 PM
Subject: 1614 West Temple Support
To: <anna.vidal@lacity.org>, <councilmember.ofarrell@lacity.org>, <craig.bullock@lacity.org>

Hello City Staff —

I live nearby the proposed building at [1614 Temple St.](#) The existing building on-site offers little utility or any real aesthetic. In fact, I've gone by this property countless times and I have no idea what the intent of this building is. It's small, rundown, and looks to be out of use.

After reviewing the plans and the existing site, I am in strong support of this project. The design is incredible. It's stunning while still being appropriate for the area. Best yet, I know what it offers.

We'll gain housing and neighborhood-serving commercial spaces while replacing a rundown, unused site. I think this plan sounds like a clear win for everyone involved, especially for the city and my future neighbors who will live there.

Please approve!

Thank you,
David Falcon
[1637 Cortez St](#)
[Los Angeles CA 90026](#)



Planning CPC <cpc@lacity.org>

Fwd: 1614 West Temple

Michelle Carter <michelle.carter@lacity.org>
To: Planning CPC <cpc@lacity.org>

Mon, Nov 16, 2020 at 12:00 AM



Michelle Carter
City Planning Associate
Los Angeles City Planning
200 N. Spring St., Room 763
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1262



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From: **Kelvin Abraham** <gododgers59@yahoo.com>

Date: Sat, Nov 14, 2020 at 5:54 PM

Subject: **1614 West Temple**

To: michelle.carter@lacity.org <michelle.carter@lacity.org>, craig.bullock@lacity.org <craig.bullock@lacity.org>, councilmember.ofarrell@lacity.org <councilmember.ofarrell@lacity.org>

Dear Councilmember O'Farrell,

Please approve the mixed-use housing project located at **1614 West Temple**. As a resident and frequent passerby of this intersection, I personally think the area could be improved and would feel safer if there were apartment homes there in place of what is there now — an old run-down building.

This project is nicely designed and will add to the local community by making it safer, better looking, cleaner, and having eyes on that corner all hours of the day and night will be a deterrent for crime. The building is not massive or too big and is just what this neighborhood needs. Normally buildings just pop up without any input from the community, but that is not the case with this one and I am very glad to be able to share my opinion on this matter. Please greenlight this project immediately by voting to approve it.

Thank you very much,

731 N St Andrews Pl
Los Angeles, CA 90028
Kelvin Abraham



Planning CPC <cpc@lacity.org>

Fwd: Regarding the 1614 W. Temple Project

Michelle Carter <michelle.carter@lacity.org>
To: Planning CPC <cpc@lacity.org>

Mon, Nov 16, 2020 at 12:00 AM



Michelle Carter
City Planning Associate
Los Angeles City Planning
200 N. Spring St., Room 763
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1262



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----- Forwarded message -----

From: chef711melissa@yahoo.com <chef711melissa@yahoo.com>
Date: Sat, Nov 14, 2020 at 2:13 PM
Subject: Regarding the [1614 W. Temple Project](#)
To: councilmember.ofarrell@lacity.org <councilmember.ofarrell@lacity.org>, craig.bullock@lacity.org <craig.bullock@lacity.org>, michelle.carter@lacity.org <michelle.carter@lacity.org>

Good Day, Councilmember O'Farrell and City Staff,

Thank you for your time and consideration, I am reaching out in support of the project proposed at [1614 W. Temple St.](#) This project is amazing with all of the housing it will provide, both market-rate and extremely low-income. I think it cannot be said enough that we are in a housing crisis, along with a global pandemic, but it is worth repeating until we solve this problem.

I know 72 Units is not going to be an overnight solution, but it is a step in the right direction. The project is not displacing anyone and is being built on a train line, which will create less traffic if the residents of this building take public transportation. I can't think of a better use of space than an empty unused building to create homes and community serving retail spaces.

I hope that you will agree with me and give this project your approval.

Respectfully,

Melissa Nelson
[5521 Harold Way #21](#)
[Hollywood, Ca 90027](#)



CPC Hearing for DIR-2019-7519-TOC-1A

2 messages

Miguel Siqueiros <editvdo@me.com>
To: cpc@lacity.org

I would like to submit these 2 photos (attached) for my part of the appeal. CPC Hearing for DIR-2019-7519-TOC-1A

Please confirm that you received this.

Thank you, Miguel Siqueiros















Planning CPC <cpc@lacity.org>
To: Miguel Siqueiros <editvdo@me.com>

Tue, Nov 17, 2020 at 1:18 PM

Good afternoon,

Please note your submission has been received and be distributed to the City Planning Commission for the meeting of November 19, 2020.



Cecilia Lamas
Commission Executive Assistant
Los Angeles City Planning
200 N. Spring St., Room 272
Los Angeles, CA. 90012
Planning4LA.org
T: (213) 978-1299 | (213) 978-1300





Planning CPC <cpc@lacity.org>

Fwd: Please Approve the 1614 West Temple Project

Michelle Carter <michelle.carter@lacity.org>
To: Planning CPC <cpc@lacity.org>

Fri, Nov 13, 2020 at 1:41 PM



Michelle Carter
City Planning Associate
Los Angeles City Planning
200 N. Spring St., Room 763
Los Angeles, CA 90012
Planning4LA.org
T: (213) 978-1262



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From: **Shaquille Arnold** <shaqrarnold@gmail.com>
Date: Wed, Nov 11, 2020 at 2:04 PM
Subject: Please Approve the **1614 West Temple** Project
To: <councilmember.ofarrell@lacity.org>
Cc: <michelle.carter@lacity.org>, <craig.bullock@lacity.org>

To City Staff,

I am reaching out on behalf of a housing project proposal at **1614 West Temple** Street. There is not one thing I do not like about this project, and I am sure many other people would agree with me, this is a very smart project. From the design, to the location and overall use, I think it is spot on.

I previously struggled with being able to afford my housing, but I lucked out and am now in an affordable housing unit. I think everyone, regardless of their income level should be able to have a roof over their heads. It is sad because there is such a rush to judgement when you hear the words "low-income," and no one wants to really deal with it in their neighborhoods, but this project is giving individuals who really need it an opportunity to call somewhere home. I think it's beautiful that we're able to include housing for those who need it inside of new buildings built for folks that can afford it.

A building like our city — diverse and working together. Not there yet, but we're on our way and this is a step in a positive direction.

I understand firsthand the relief of knowing that I will be able to pay my rent and bills every month, without the constant fear of eviction. This pandemic has exacerbated the housing

shortage and now more than ever is the time for compassion.

Please approve this project. Thank you.

Sincerely,

Shaquille Arnold

[1552 Schrader Blvd](#)

[Los Angeles CA 90028](#)

DAY OF HEARING SUBMISSIONS



Los Angeles Community Action Network (LA CAN)

November 18th, 2020

**RE: 100% Affordable Housing Project at 414 Crocker Street by Little Tokyo Service Center
(Case No. CPC-2020-87-GPAJ-VZCJ-HD-SPR-PHP)**

Dear Ms. Kahen,

The Los Angeles Community Action Network (LA CAN) is writing this letter to express our strong support for the Crocker (Umeya) Apartments project located at 414 Crocker Street, Los Angeles, CA 90013.

LA CAN is a community-based membership organization that has been working in the community of Skid Row since our inception in January of 1999. LA CAN was created with the mission to ensure people dealing with poverty could create and discover opportunity while severing as a vehicle to ensure we have voice power and option in the decision directly impacting us. On a daily we bring together Skid Row residents to work on mutual aid projects, community improvement project and community organizing projects.

LA CAN supports the Crocker (Umeya) Apartments project because it is a 175-unit, 100% affordable housing project for low-income households earning less than 50% AMI. Half of all units will be reserved as permanent supportive housing for homeless individuals. As an organization who membership in the Skid Row are we look forward to see the impact that this project will have in moving people from homelessness to housing.

Little Tokyo Service Center (LTSC) will be the on-site service provider of intensive case management services and other wraparound services, and they have been engaged in community conversations about ground floor community-serving spaces.

LA CAN and LTSC are longtime partners, with our latest partnership being the Central City United People's Plan. As the City undertakes downtown planning and rezoning efforts like DTLA 2040, it becomes essential to the preservation of our neighborhood that projects provide for affordable and permanent supportive housing. The City's is attempting to change downtown its efforts should be accompanied by efforts to protect deeper affordability, especially extremely low-income housing, in Skid Row. The Crocker (Umeya) Apartments project will provide more than 80 extremely low-income units to be set aside for homeless individuals.

We urge the City of Los Angeles to approve this project without further delay. It is important that Crocker (Umeya) Apartments moves forward soon, to provide urgently needed affordable and supportive housing.

If you have any questions, please do not hesitate to contact (213) 228-0024 or via email at steved@cangress.org.

Sincerely,

A handwritten signature in blue ink, appearing to read "Steve Diaz", is written over a horizontal line.

Steve Diaz
Deputy Director



Gio Galarza

 (213)949-7768

 giogalarza711@gmail.com

 @ILoveHomelessLA

Samantha Millman
President
Los Angeles City Planning Commission
Los Angeles City Hall
200 N. Spring Street, Suite 525
Los Angeles, CA 90012

Re: Letter of Support for 5860 W Jefferson Blvd. Los Angeles, CA 90016

Case No. CPC-2019-4992-AD-ZAD-SPR

Dear Ms. Millman,

My name is Geovanny Galarza and I am the founder of the I Love Homeless L.A. Foundation in support of the unhoused people of this city. Our mission is to feed and heal our unhoused population and eventually reintegrate them into society. Because of the avenues we pursue in this undertaking, we support the proposed Project at 5860 West Jefferson Boulevard.

We support this project because it provides economic and employment benefits to Angelenos who so desperately need both in times like these. We are enheartened by the fact that the Applicant worked with the local community on this Project and exhibited their willingness to hear respond to community input. The Applicant has made steadfast commitments that will ensure the employment of local workers and support local workforce training and development.

We also believe that the overall Project design is consistent with the highest standards of safe, environmentally-friendly, and sustainable development. Finally, we find immense value in this project as residents of the City. For these reasons, we respectfully request your approval of the Project.

Thank you for your consideration.

Sincerely,

Gio Galarza
Founder
I Love Homeless L.A. Foundation

November 18, 2020

Dear Members of the City Planning Commission:

I am addressing you regarding item 8 (CPC-2019-4992-CPIOA-ZAD-SPR-WDI) on the agenda, the proposed project on 5860 W. Jefferson Blvd. located right at the boundary of Los Angeles and Culver City. I would like to include my comment for the public record as I cannot attend this morning meeting.

The proposed project on 5860 W. Jefferson Blvd is stated to be 22 stories high with over 900 subterranean parking spaces available, with the Expo Line station less than half a mile away. My biggest concern with this project is how it will affect transportation in the area and its residents. I reside in the West Adams/South LA area but commute to work in Culver City and I frequent Ballona Creek to get my exercise, go to work or to go to the beach, located in the vicinity of the proposed project. My commuting routine varies, I'll drive, bike, walk, or take the Expo Line; however, I'm only one of a handful of people in my organization that takes such actions, the great majority choose to drive in single occupancy vehicle. Rush hour in this area is horrendous as there are major back-ups and sometimes even gridlock.

If there was a traffic study, I strongly believe the traffic out of Culver City, should have been included as it impacts the traffic in the City of Los Angeles. If a traffic study was in fact conducted, I'm surprised staff is recommending the project to move forward. In case you haven't been in the area after 4:30pm on a weekday (pre-COVID), I can guarantee that you will be stuck in traffic for good part of your commute. Intersections at (1) Jefferson Blvd & National Blvd., (2) Obama Blvd. & Jefferson Blvd., (3) Higuera St./Obama Blvd. & Eastham Dr., (4) Washington Blvd. & National Blvd., (5) La Cienega Blvd. & Jefferson Blvd. (6) Obama Blvd. & Jefferson Blvd., (7) La Cienega Blvd. & Washington Blvd., (8) Jefferson Blvd. & Corbett St., (9) La Cienega Blvd. & Corbett St., and (10) Obama Blvd. & La Cienega Blvd., (11) Jefferson Blvd. & Duquesne Ave., (12) Jefferson Blvd. & Hetzler Rd., (13) National Blvd. between Washington Blvd. & Jefferson Blvd are all packed during rush hour, I have seen and experienced it. There are drivers making illegal left turns, drivers in the middle of intersection (blocking traffic), long lines to make a turn onto a major street, and even drivers cutting other off on the designated turn lanes. Traffic signals have not been updated to address traffic mitigation.

There are bikes lanes and public transportation to help mitigate the issue; however, they are not as efficient as one would hope. For instance, this project is proposing over 900 parking spaces, when it is located less than half a mile from the Expo Line station, an 8-minute walk as is the Metro station parking garage. If the developer truly envisioned tenants to commute via alternate modes of transportation not in a single occupancy vehicle, there would not be a request for a high amount of parking spaces. It is adding more cars to an area that has very little to no outlet streets. As for biking, it is quite dangerous to be in the designated bike lane along Jefferson or on the sidewalk by the Expo Bike Path. I have had too many close calls along Jefferson Blvd., where the street diverges to Obama Blvd. and on the Expo Bike path crossing on Jefferson Blvd. and National Blvd. Once while waiting for the traffic (pedestrian) light on the Expo Bike Path to change so I could continue towards La Cienega Blvd. (driver wasn't paying attention) and another where Jefferson Blvd. and Obama Blvd. diverge a car didn't want to wait for me to pass, sped up and passed me nearly hitting me, the only reason I did not get hit is I pulled the brakes.

This proposed project is an additional business in the area not only in the City of Los Angeles, but also Culver City's Hayden Tract, located right across the street from where this proposed project will stand, on the other side of Ballona Creek. As City of Los Angeles and the developer are not required to confer with the neighboring Culver City, the developer will possibly only pay traffic impact fee to Culver City for the traffic impact and settle the issue; however, this remedy does not fully resolve the problem at large. I understand there is no requirement to inform a neighboring city of any upcoming plans, but I would expect cities to offer that courtesy and work together to provide the best for all residents and commuters.

Unfortunately I cannot go over 400+ pages of the report as I have class and work, but in the summary provided I did not see reference to protective measures or enhancements to the bike path by the developer particularly along Jefferson Blvd., which requires maintenance every few months along the Ballona Creek side (City of LA) as the shrubs block the bike lane. Nor did I see any methods to facilitate or work with the stakeholders of Ballona Creek, from my understanding the revitalization of Ballona Creek is quite difficult as it any changes or updates need to meet US Army Corps of Engineers standards and guidelines.

I'm quite concerned about the traffic impact because current traffic conditions (pre-COVID), make it difficult to conduct even the most basic errands such as going to the grocery store or to fill up on gas. As with many buildings that offer parking spaces, they will more than likely include a fee to tenants. The community has seen an uptick in parking in the neighborhood, particularly after the Metro station parking garage implemented a small parking fee. I can only imagine how the neighborhood will be impacted once with proposed project is finished along with others in the area such as the Cumulus project and (W)rapper project. The projects are a good investment to the area, but I want to know who it will benefit in the end. The median income of the South LA area is approximately \$46,300, many of my neighbors are not office employees, they work in retail, labor, and other lower paying jobs. The neighborhood around them is changing and with it, are higher costs of living and they are only finding jobs further away from home. The neighborhood is changing, I see it just a few years ago no one wanted to live in the area, everyone scoffed at the idea, but now the area is appealing to all those who scoffed at the idea. The area is becoming unlivable for those that cannot afford it. Do a quick look on any of the real estate websites, they are now pricing homes upwards of \$500,000; the homes are not worth in the area, developers want it for the property to build upwards, sell/lease, and move on. They are not interested in the well-being of the community, they are interested in enhancing the community so they can further profit.

I strongly urge you to take consider this and reconsidered the recommended actions provided because it will not benefit me or the community I live in, but newcomers who can afford to live here and will possibly push long-time residents out.

Best,

Xochitl Cruz

Photo #1 – General Map

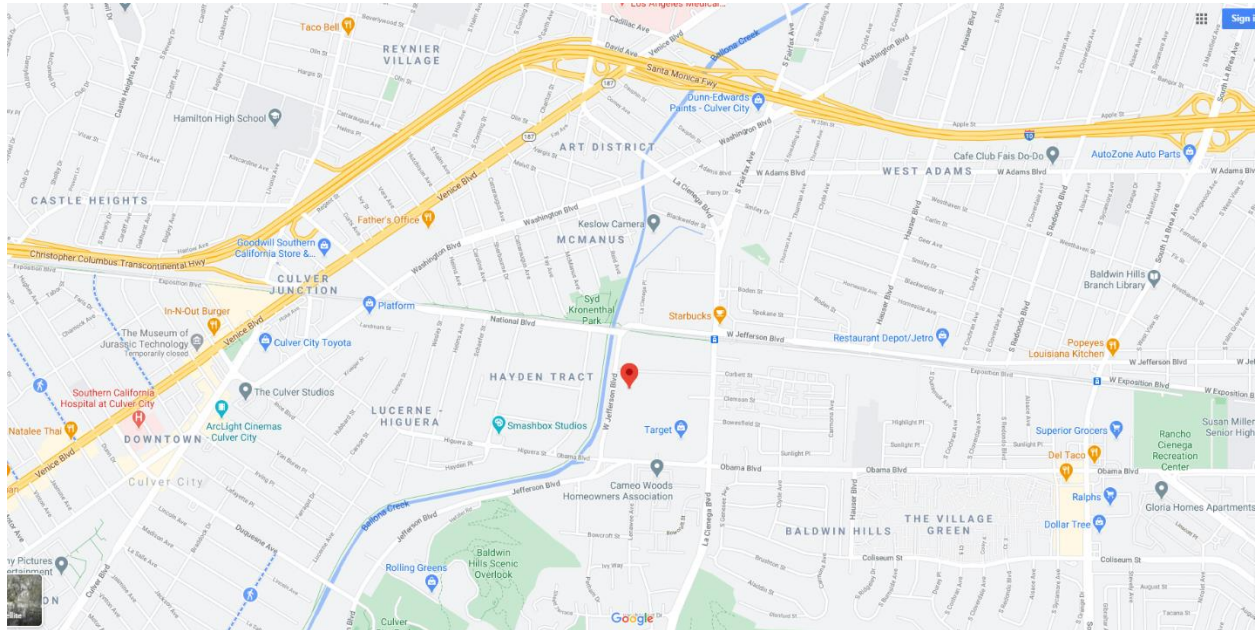


Photo #2 – Culver City Boundary Lines (Zoomed In)



Photo # 3 – Culver City Boundary Lines (Zoomed Out)





Youth Empowered through Scholastic Sports Service

Samantha Millman
President
Los Angeles City Planning Commission
Los Angeles City Hall
200 N. Spring Street, Suite 525
Los Angeles, CA 90012

Re: Letter of Support for 5860 W Jefferson Blvd. Los Angeles, CA 90016
Case No. CPC-2019-4992-AD-ZAD-SPR

Dear Ms. Millman,

My name is Herberto Sanchez and I am writing as the representative of the Latino Educational Fund, a nonprofit community-oriented organization dedicated to helping the Latino/as of Los Angeles reach their fullest educational and career potential as well as financial independence. We support the Project at 5860 West Jefferson Boulevard and we believe this project will be an important stepping stone to empowering our community

We support this project because it provides economic and employment benefits to Angelenos who so desperately need both in times like these. We are enheartened by the fact that the Applicant worked with the local community on this Project and exhibited their willingness to hear and respond to community input. The Applicant has also made steadfast commitments that will ensure the employment of local workers and will support local workforce training and development.

We also believe that the overall Project design is consistent with the highest standards of safe, environmentally-friendly, and sustainable development. Finally, we find immense value in this project as residents of the City. For these reasons, we respectfully request your approval of the Project.

Thank you for your consideration.

Respectfully,

Daniel Morales
Founder/Executive Director
YESSS

1833 West 8th Street Suite 111, Los Angeles, CA 90057
PHONE: (213) 220-4938
EMAIL: DANIELMORALES@YESSSLA.ORG

Equitas' 500 E-Signature Petition

11/16/2020

To City Planning Commission,

An email from Ms. DeAtlan was sent to your office on or about 10/28/20 with an attachment that included over 500 e-signatures of supporters for Equitas schools. These were mostly from parents whose children attend the schools. She indicated that 370 of the 530 signatures belonged to CD1 residents. Ms. DeAtlan, however, did not mention that only 19 signatures of the 370 reside within the 500 feet radius. By our calculation, that is only about 5% of the signatures collected. In addition, some of the support letters sent were also from individuals who do not reside or have businesses within this specific zone.

Our petitions were circulated in person, and we concentrated our outreach within this zonal radius. We did talk to some of the 19 supporters who stated they understood the community's problems, but said that they had to support the school because their children were enrolled at Equitas.

Therefore, it is only fair, and logical, that the City Planning Commission give more credence and weight to those 73 residents living within the 500 feet radius who oppose the project because they are cognizant of actual problems and issues. And likewise, less weight to those 500 plus Equitas' supporters who do not live in the impacted area; those who will drive in, cause traffic congestion and leave.

We want to make it clear that It is not the school which the residents oppose, but the proposed location and the increased student body that will significantly affect our community which is already suffering from lack of parking and serious traffic congestion.

Thank you for your time.

Sincerely,

Andrew and Yasmin Corona

Equitas' 500 E-Signature Petition

CPC-2020-4095-ZV-CU-SPR2

City Planning Commission Department of City Planning
200 North Spring Street
Los Angeles, CA. 90012

November 18, 2020

Re: Case No. CPC-2020-4095-ZV-CU- SPR Proposed Elementary Schools at 1608-1636 West Pico Blvd., 1321 – 1331 South Union Avenue Agenda Item No. 9, Regular Commission Meeting on November 19, 2020

Honorable Commissioners,

We have read the entire case packet on Equitas' proposed conversion plan. In the event that the Commission decides to approve this project, the residents insist that the Commission impose the same Conditional Use Permit which now applies to the 1700 W. Pico Blvd location to the 1608-1636 W. Pico Blvd and 1321-1331 S. Union location as well.

This Conditional Use Permit forbids the following:

- Equitas' parents from driving down Constance Street after drop-offs and pick-ups on Pico Blvd
- Parking by parents and staff on Constance Street and neighboring streets
- Using Constance Street for pick-ups and drop-offs.

This Conditional Use Permit was adopted to mitigate the impact of Equitas' traffic on the community with a student body enrollment of 462. The new location will double the amount of traffic with a 1000 student body admission which makes it all the more necessary to apply the Conditional Use Permit to it.

In either case, it does not make sense to have a Conditional Use Permit one school, and not on the other.

In addition, the community has additional concerns:

1. Installing a traffic signal on Constance Street and Pico was suggested by the Transportation Engineer (case file pg.345) as a possible solution to Equitas' circulation and access deficiencies. This is not acceptable:
 - It ignores our Conditional Use Permit.
 - It will divert overflow traffic wishing to avoid Union Ave southbound to our residential street, and convert it into a throughfare.
2. After the expansion there will be 90 Equitas employees (40 teachers, 20 administrators, and 30 corporate staff) with 12 parent volunteers. In sum, there will be 102 Equitas' personnel arriving to the area every day.
 - Equitas has only 54 parking spaces. Where will the other employees park?
 - Thus, 48 cars will be forced to seek parking in and around the school.
 - Solution was to implement Transport Demand Management Strategies to mitigate traffic volume
 - Charge all employees \$1.00 for parking fee, offer daily transit subsidy of \$2.98, and use promotional and marketing as educational tools to encourage alternative mode of travel.
 - There is no evidence that this will work, only speculation.

Construction Concerns

1. Health, safety and quality of life during construction are top priority.
 - It seems all the studies show no one will be affected in the short-term. However, this again is only speculation.
 - Residents will definitely be exposed to at least 13 months of noise, building contaminants, pollution from diesel trucks, traffic caused by hauling in and out of area.
 - Based on the age of the existing buildings, it is possible that asbestos-containing material (ACM) and lead based paint (LBP) are potentially present in building materials within the structure.

- Individual cancer risk is a likelihood over a 30-year exposure period to Toxic Air Contaminants, but short-term effects are not known.

2. Noise

- Noise from construction for 13 months will add a burden to Pico-Union residents who work at night. Sleeping during the day will be difficult. Those residents working from home will also be affected.

Lastly, we would like the Commission to know that the community opposes the location and traffic impact, not Equitas Academy Schools. We firmly believe that all children must have the opportunity for quality learning especially for those in our community.

We hope that you will take into consideration the concerns and issues addressed in this letter from the most impacted residents that live within the 500 feet radius.

Thank you for your time.

Sincerely,

Aurora, Andrew and Yasmin Corona

104 Residents Who Signed Opposition Petitions



GILBERT A. CEDILLO

COUNCILMEMBER
FIRST DISTRICT

November 18, 2020

City Planning Commission
Department of City Planning
200 North Spring Street
Los Angeles, CA. 90012

**Re: Case No. CPC-2020-4095-ZV-CU- SPR
Proposed Elementary Schools at 1608-1636 West Pico Blvd., 1321 – 1331 South Union Avenue
Agenda Item No. 9, Regular Commission Meeting on November 19, 2020**

Honorable Commissioners:

On October 26, 2020, my office hosted a community meeting targeting constituents who live and work in proximity to the proposed school site, and subsequently engaged in a follow-up discussion with the applicant. My office requested that the school's leadership participate with community members and my staff present to allow neighborhood residents, property and business owners an opportunity to directly voice their concerns.

Community members shared their frustrations with the ongoing traffic congestion created when parents pick-up and drop-off students at an existing nearby school located **1700 Pico Boulevard**, and operated by the same applicant (adopted under CPC-2011-1109-CU on October 13, 2011). My office asked school representatives to clarify future plans for the building at **1608-1636 Pico Boulevard** (the subject of the current conditional use permit before you). We asked the school leadership to review traffic impacts and parking mitigation measures related to current school operations at **1700 Pico Boulevard**, and consider comprehensively the collective impacts resulting from adding two new elementary schools at **1608-1636 Pico Boulevard**.

My office reiterated the key community concerns we heard and asked the school to be responsive to those concerns, including:

- Potential impact of vehicles queuing and backing up on to Union Avenue which has one southbound travel lane and one northbound travel lane
- Potential air quality and health impacts due to car idling on Union Avenue and at parking lot, given adjacent residential population
- Observations about motorists' behaviors (Equitas parents) and existing operations at **1700 W. Pico Blvd.** during drop-off and pick-up periods:
 - Double Parking
 - Parking on Red Curb
 - Vehicles Blocking Driveway

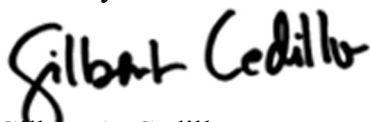
- Parking by Non-Residents on Constance Street and Union Avenue (to avoid drop-off / pick-up lines), thus impacting availability of public street parking serving local residents
- Vehicles Blocking DASH Stop on Union Avenue
- Community members asked will these behaviors continue and be exacerbated by the addition of vehicular traffic generated from two new elementary schools at **1612 W. Pico Blvd.?**
- Using parent volunteer traffic control monitors is ineffective
- Potential construction phase impacts on residential neighborhood
- Will parking lot spaces adequately serve teachers, administrative staff, janitorial workers, meal servers, other employees and volunteers?
- Concern about public safety (given adjacent location of existing liquor store, gang activity, violence, presence of inebriated individuals and other neighborhood conditions)

In the event the Commission is inclined to grant the request, I would concur with imposing these suggested conditions. Highlights include:

- The full capacity of the parking lot shall be used for queueing (directing cars into a double line on the lot) to avoid spillover into Union Avenue, where vehicles may block traffic and the DASH bus stop
- The school shall appoint a "Traffic Ambassadors" (a School Employee, Not a Parent Volunteer) who shall monitor, and report traffic and parking concerns on the neighborhood residential streets next to the school.
- At least one monitor shall be positioned at the eastern end of the alley at Union Avenue and at least one monitor shall be positioned at the western end of the alley at Constance Street to ensure efficient movement of cars entering and exiting the alley to pick up and stop off students. One of the monitors shall be a "traffic ambassador" who is specially employed and trained by the applicant to prevent parents from (i) parking or double-parking on Constance Street and blocking driveways on Constance Street, (ii) queueing their cars on Union Avenue for pick-up or drop-off, (iii) picking up and dropping off students on Constance Street or Union Avenue and (iv) blocking access to the residential parking lot near Constance Street that can be accessed from the alley.
- LADOT shall review the proposed Traffic Circulation Plan & Drop-Off / Pick-U Plan, may modify Plan and determine if any traffic controls school warning and speed limit signs, school crosswalk and pavement markings, passenger loading zones and school bus loading zones are needed.
- Staggered Hours for Drop-Off & Pick-Up shall be implemented for the existing school and two new schools
- The schools shall annually monitor their student loading/unloading area and related traffic patterns during the drop-off and pick-up hours. If there are neighborhood cut-through issues that could be resolved through neighborhood traffic calming measures (like speed bumps, temporary turn restrictions, or changes to the loading zone), then the school shall work with the affected residents, Council Office and LADOT to determine the appropriate course of action.
- As enrollment increases incrementally each year, the applicant shall submit to the Department of City Planning and the Council Office a report prepared by a traffic consultant or with the assistance of a traffic consultant that (i) summarizes the effectiveness of the pick-up/drop-off system during the prior school year, (ii) describes any refinements of that system implemented during the prior school year and that will be implemented during the next school year and (iii) summarizes any substantial concerns, if any, raised by the community during the prior school year and how the applicant responded to those concerns.

Please contact my office at (213) 473-7001 if you have questions or need more information.

Sincerely



Gilbert A. Cedillo
Council Member, First District

c: Pico-Union Community Stakeholders

Attention Hearing Officer Truong and City Planning Commission
RE: Equitas Academy Charter Schools - CPC-2020-4095-ZV-CU-SPR

November 10, 2020

We write this letter as longtime residents of the Pico-Union area who wish to express our opposition to Equitas Academy's proposed expansion. Equitas Academy is already creating serious traffic and parking problems for the neighborhood, and we believe the expansion will make a bad situation worse. The process for approving the expansion has done nothing to assuage our concerns:

The Most Immediately Impacted Residents Have Not Had An Opportunity To Make Their Views Known

There have been three meetings on the expansion. Of necessity they were held online, but this format is a serious barrier in a neighborhood where many of the residents lack adequate internet access or are simply uncomfortable with the technology. This problem was compounded by Equitas' failure to adequately publicize the meetings. Astonishingly, the Public Hearing (10/21) was announced only in English even though the neighborhood consists mainly of Spanish speakers. In the other case (10/08), Equitas' efforts can be described only as desultory. This stands in stark contrast to their efforts with their own clients who were made aware of the meetings and encouraged to attend. In order to redress this unfairness, we circulated a petition in opposition to the expansion and soon had over 100 signatures. A petition, however, is a blunt instrument. It allows those who sign to state only that they oppose the expansion. It does not allow them to state how it will affect them personally. Again, this stands in stark contrast to Equitas' clients who have been allowed to describe at length the benefits the school provides them. As yet there has not been a satisfactory airing of the views of the immediate neighborhood!

Equitas has not been honest in their dealings with the city government and the community

Equitas Academy told Councilman Gil Cedillo and community representatives that they did not intend to convert the building at 1612 Pico Boulevard into a school serving additional students. Yet this is exactly what they now propose to do.

Equitas' Traffic Plan Is Not Credible

Traffic congestion is the most serious problem that Equitas causes for the community. We have seen this every day for 8 years; and that is with a school serving 462 students. The expansion will bring an additional 1,000 students to the area. In other words, traffic will be three times as bad. Equitas has prepared a traffic plan which we find to be seriously flawed.

- The plan was prepared by a consulting firm paid for by Equitas. Therefore, it is not an unbiased analysis and should be evaluated accordingly.
- The plan calls for school traffic to make use of Constance St., which is a violation of the Conditional Use Permit.
- The substance of the plan is deeply flawed:
 - It is predicated on the assumption that queues will not exceed 17 cars because 70% of students walk to school. We regularly see queues longer than that now!
 - It does not adequately address the traffic back-ups that will be caused at the intersection of Pico and Union.
 - It ignores the following issues:
 - two alley parking-lots will be blocked during drop-off and pick-up times.
 - alley traffic poses a hazard to pedestrians and vehicles entering and leaving the alley parking lots
 - the alley is used for garbage collection and this may conflict with Equitas' schedule for drop-offs and pick-ups.

Attention Hearing Officer Truong and City Planning Commission

RE: Equitas Academy Charter Schools - CPC-2020-4095-ZV-CU-SPR

- Equitas' traffic will block the DASH stop on the corner of Pico and Union
- Equitas' traffic will block Pico Clinica Medica Latina's drop-off/loading area, which is used by the elderly the disabled.

Equitas' expansion will exacerbate the neighborhood's serious parking problems

- The city added restrictions to 9 metered spaces in order to accommodate Equitas' school at 1700 Pico Blvd. We are concerned that Equitas' expansion will require similar accommodations. We anticipate that restrictions will be needed at 11 additional metered spaces.
- Parking in in Pico-Union is already inadequate, and residents therefore have no choice but to park in these metered spaces. These parking restrictions require them to move their cars at extremely inconvenient times.

Exhaust from Equitas' traffic poses a serious health risk to the residents

- At present cars idle continuously for 30 – 45 minutes during drop-offs and pick-ups. The expansion will make this problem significantly worse.
- There are 6 individual homes, five apartment complexes and two businesses in the immediate area.
- Armored Transport, the previous occupant of 1610 W. Pico, acknowledged this problem, posting signs warning of carcinogens from their idling trucks.

Equitas has not been a good member of the community

The Equitas' school at 1700 W Pico has been in operation for 8 years. During that time

- Parents and staff drive and park on local streets in violation of Conditional Use Permit.
- They make up their own parking signs that further restrict residential parking.
- Ignored problems at 1610-1612 prior to taking ownership despite the fact they created an unsafe environment for their own students. Since 2017, 1612 W. Pico attracted drunkards who urinated, defecated, vomited, passed out on the sidewalk and performed sexual and lewd acts.

The proposed traffic plan will not work. This, with the increased student body, will impact the community significantly. We hope that our letter the City Planning Commission understand the reasons why the residents are opposed to Equitas' conversion and traffic plan proposal.

Thank you for your time,

Maggie Ibarra, Mike Rieger and Family

Equitas' 500 E-Signature Petition

11/19/2020

To City Planning Commission,

An email from Ms. DeAtlan was sent to your office on or about 10/28/20 with an attachment that included over 500 e-signatures of supporters for Equitas schools. These were mostly from parents whose children attend the schools. She indicated that 370 of the 530 signatures belonged to CD1 residents. Ms. DeAtlan, however, did not mention that only 19 signatures of the 370 reside within the 500 feet radius. By our calculation, that is only about 5% of the signatures collected. In addition, some of the support letters sent were also from individuals who do not reside or have businesses within this specific zone.

Our petitions were circulated in person, and we concentrated our outreach within this zonal radius. We did talk to some of the 19 supporters who stated they understood the community's problems, but said that they had to support the school because their children were enrolled at Equitas.

Therefore, it is only fair, and logical, that the City Planning Commission give more credence and weight to those 73 residents living within the 500 feet radius who oppose the project because they are cognizant of actual problems and issues. And likewise, less weight to those 500 plus Equitas' supporters who do not live in the impacted area; those who will drive in, cause traffic congestion and leave.

We want to make it clear that It is not the school which the residents oppose, but the proposed location and the increased student body that will significantly affect our community which is already suffering from lack of parking and serious traffic congestion.

Thank you for your time.

Sincerely,

Max Rosenkrantz

Equitas' 500 E-Signature Petition

CPC-2020-4095-ZV-CU-SPR2

November 18, 2020

File Number: 65WY-307331

BY EMAIL

Los Angeles City Planning Commission
City of Los Angeles
200 N. Spring Street, Room 272
Los Angeles, California 90012
Email: cpc@lacity.org

Re: Requested Modifications to Conditions of Approval for Equitas 5-6
Elementary Schools Project (CPC-2020-4095-ZV-CU-SPR, the "Project")

Honorable President and Commissioners:

Equitas Academy Charter Schools ("Equitas") requests two revisions to the proposed conditions of approval in the Recommendation Report for the Project, which the City Planning Commission will consider at its November 19 meeting (Item 9).

1. Condition 8.e (Tree Location). Equitas requests that you modify Condition 8.e. as follows:

- 8.e. Trees shall be located in such a manner and be of such a size that the trees are capable of producing an overhead canopy that will shade at least 50 percent of the ~~westernmost~~ easternmost row of vehicle parking stalls (consisting of ~~24~~ 13 spaces) after 10 years of growth.

This change is requested because the relevant full row of trees are actually located along the **eastern** perimeter of the parking lot, as shown in the Parking Lot Planting Plan, which is Sheet 26 in the plan set (we also note that the westernmost row of parking spaces does not contain 24 spaces). This condition, as written, would require a significant and needless redesign of the parking lot and circulation pattern to plant additional trees on the western side of the parking lot.

2. Rooftop Solar (Condition 11.a). Equitas requests that you modify Condition 11.a. as follows:

- 11.a. A minimum of 15 percent of the total roof area shall be reserved for the installation of solar panels. ~~The solar panels shall be installed prior to the issuance of a certificate of occupancy.~~ The lowest point of any solar panel may not be more than five feet above the roof line.

We understand that this condition was included to comply with the solar-ready requirement for non-residential buildings in Section 110.10(b) of the California Energy Code (such compliance is required by the City pursuant to Section 99.04.211.4.2 of the LAMC, which is part of the Los Angeles Green Building Code).

However, these code provisions do not require the actual installation of solar panels. Because this is an existing building, it would be very difficult and costly to install solar panels on the existing roof as part of the initial building conversion. Therefore, Equitas respectfully requests the deletion of the second sentence, so that Equitas is required to make at least 15% of the roof solar ready but can decide later whether to install solar panels.

On behalf of Equitas, we ask that the Commission approve the requested entitlements for the Project with these two requested modifications to the conditions of approval.

Very truly yours,



Jack H. Rubens
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

10+ CONSTITUENTS SUBMITTED THE FOLLOWING STATEMENT FOR YOUR CONSIDERATION:

Dear Los Angeles City Planning Commission,

It is my pleasure to provide this letter of support for the 1614 Temple Project, a development of 72 homes for residents in Echo Park. The City Application number is DIR-2019-7519-TOC.

With the new construction of 72 homes, 7 of which are reserved for extremely low-income households, this is another step towards continue to address the overwhelming need for creating more housing for people across Los Angeles, especially in Echo Park. Not only is this a net gain of 72 homes, but it's also an opportunity to put homes near transit to continue to encourage multi-modal transit options. Lastly, these homes are being built right next to a park and given the impact of climate change, homes being built near green spaces are needed now more than ever.

I strongly support this project because it will house people in great need, including those who are extremely low-income. Los Angeles needs to focus more attention on this critical problem and developments like this one are part of the solution. By investing in more housing, we make our communities safer, healthier, and more inclusive.

Personally sent by (SEVERAL CONSTITUENTS) using Abundant Housing LA's Advocacy Tool. AHLA is a grassroots pro-housing organization.



1635 Cortez st, Arnulfo Rodriguez statement

Arnulfo Rodriguez <arodriguezjr.89@gmail.com>
To: cpc@lacity.org

Thu, Nov 19, 2020 at 8:40 AM

Arodriguezjr.89@gmail.com
2132167261

My name is Arnulfo Rodriguez Jr.

I have been living at 1635 Cortez st. Over 20 years.

I have many concerns about the proposed complex.

One being very serious health concerns this building will cause to me and our home.

I can not have a parking structure venting out it's pollution into my backyard.

Carbon monoxide and nitrogen dioxide will suffocate and destroy my well being aswell as the well being of my father, who's is a diabetic with many health concerns already, and my mother who both are senior citizens and cannot be living under these hazardous conditions.

I would not be safe, no one that lives or visits here would be safe. My neices and nephews, my pets....My future children would not be safe here.

We will have no privacy as too any windows that would be facing our property. I do not want to be anyone's entertainment.

This building will shadow our beautiful back yard and limit our sunshine.

Another issue would be parking, which already is an issue.

Unfortunately I cannot build a drive way on my property. I struggle to find parking close to my home, many times multiple blocks away.

The amount of retail traffic and surge of neighbors with one or multiple vehicles will make it impossible to park near my home.

I cannot be walking blocks and blocks to get from my car to my home, and from my home to my car. It is not safe or reasonable for me or my parents, especially at their age.

They cannot be under these circumstances when they leave their home to the Dr's office or to the market.

Commuting through our neighborhood in car or on foot will be a problem as there will be so much more activity on our street and our ally ways. The congestion will be overwhelming for the entire community.

Before the complex is even built!

the construction, the heavy machinery, the hazardous debris, pollution, the immense noise, for who knows how long... will affect my health and the well being of my family

and pets. The stress of under such intense environment is not something that we will be comfortable with... in any way.

We are an immigrant family that has struggled and worked hard for many years to own this home. We have lived here for over 20 years and have seen this neighborhood change to what it is now.

This building does not belong, especially with the extra amount of units that are being proposed.

Thank you.

Sent from my iPad



Planning CPC <cpc@lacity.org>

Fwd: 1614 W. Temple Support

2 messages

Michelle Carter <michelle.carter@lacity.org>
To: Planning CPC <cpc@lacity.org>

Tue, Nov 17, 2020 at 3:45 PM

----- Forwarded message -----

From: **Bridges Over troubled waters** <overtroubledaqua@gmail.com>

Date: Tuesday, November 17, 2020

Subject: [1614 W. Temple Support](#)To: councilmember.ofarrell@lacity.orgCc: craig.bullock@lacity.org, michelle.carter@lacity.org

Dear City Council,

My girlfriend and I heard about the [1614 W. Temple](#) project through my Aunt and we were immediately supportive of it. I really do not understand why there even needs to be a process for this type of thing if there are no people who are being asked to move and it is going to provide housing for extremely low-income residents and some market-rate units of housing as well, during a time when we need as much housing as we can get. And the small retail spots will be a welcomed addition to the area.

My girlfriend and I live in an affordable housing unit, and if someone decided that their view or traffic or outward design, or whatever other excuses people give to oppose these types of projects was enough to destroy, even the idea of it, we would not have a home. I think if more people had empathy and understanding for people who are in different circumstances than themselves, we would live in a better world. During this pandemic, we have come together and helped each other survive an uncertain future and we just need to come together and build enough housing so that everyone has a place to call home. Please approve this project and thank you for your time and consideration.

Respectfully,

Brandon Bridges

[5523 Harold Way](#)[Los Angeles, Ca 90028](#)

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Michelle Carter
City Planning Associate

**Los Angeles City Planning**

200 N. Spring St., Room 763

Los Angeles, CA 90012

Planning4LA.org

T: (213) 978-1262

**Regular Day Off:** *Every other Friday*

Planning CPC <cpc@lacity.org>

Thu, Nov 19, 2020 at 7:07 AM

To: Michelle Carter <michelle.carter@lacity.org>

Good morning,

Please note your submission has been received and be distributed to the City Planning Commission for the meeting of November 19, 2020.

**Cecilia Lamas**

Commission Executive Assistant

Los Angeles City Planning

200 N. Spring St., Room 272

Los Angeles, CA. 90012

Planning4LA.org

T: (213) 978-1299 | (213) 978-1300



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Planning CPC <cpc@lacity.org>

Fwd: 1614 W. Temple Support

2 messages

Michelle Carter <michelle.carter@lacity.org>
To: Planning CPC <cpc@lacity.org>

Tue, Nov 17, 2020 at 3:48 PM

----- Forwarded message -----

From: **lady luck** <ladyluck39@yahoo.com>

Date: Tuesday, November 17, 2020

Subject: 1614 W. Temple Support

To: "councilmember.ofarrell@lacity.org" <councilmember.ofarrell@lacity.org>

Cc: "michelle.carter@lacity.org" <michelle.carter@lacity.org>, "craig.bullock@lacity.org" <craig.bullock@lacity.org>

To Councilmember Mitch O'farrell and City Staff

My name is Rachel Jensen and I am a longtime LA resident and I learned about the proposed project for [1614 W Temple street](#) through my boyfriend's Aunt — I am in full support of the design, use, and overall direction of this proposal. I hope that you will approve it and many more soon. I was so excited to be able to get involved in my community, and speak out on what is going on in my City Council district. I vote in every election and because I am stuck working from home during this Pandemic, I wanted to do more to help out than just voting.

I think it is great that you consider all of the community when you make decisions like this, and not just the voices of a few vocal objectors, as I imagine it can be hard to appease everyone. In the case of this project, I ask you to vote with your conscience, heart, and mind.

There is no reason not to allow a project to be built that will provide homes and retail shops in a really responsible and thoughtful way. Thank you for taking the time to consider what I have to say, I hope you agree that this is a good project and give it your approval.

Sincerely,

Rachel Jensen

[5523 Harold Way](#)

[Los Angeles, Ca 90028](#)

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To: Michelle Carter <michelle.carter@lacity.org>

Thu, Nov 19, 2020 at 7:07 AM

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