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- **“Initial Submissions”**: Compliant submissions received no later than by end of day Monday of the week prior to the meeting, which are not integrated by reference or exhibit in the Staff Report, will be appended at the end of the Staff Report. The Staff Report is linked to the case number on the specific meeting agenda.
- **“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

September 8, 2021

TO: City Planning Commission

FROM: Sergio Ibarra, City Planner

TECHNICAL MODIFICATION TO THE STAFF RECOMMENDATION REPORT FOR CASE NO. CPC-2019-6289-GPA-ZC-HD; 640-700 WEST 27TH STREET

As a result of modified plans submitted by the Applicant, the following technical modification is to be incorporated into the staff recommendation report to be considered at the City Planning Commission meeting of September 9, 2021, related to Item 7 on the meeting agenda.

The following are additional proposed Conditions of Approval to the Director of Planning's staff report. Conditions 26 and 27 are to be included to reflect project design features incorporated into the project by the Applicant since the July 8th Commission Meeting. The conditions are as follows:

26. Solar Panels. The project shall include a row of solar panels on the roof of the parking structure covering 7,645 square feet, while maintaining adaptability of the remainder of the roof should the structure be converted in the future to a more energy intensive use, as shown in Exhibit G.

27. Electric Vehicle Chargers. The project shall provide 73 EV chargers on Day 1 of operation of the structure with 146 stalls wired for future adaptability.



August 30, 2021

Ms. Emily Gable, City Planner
Los Angeles City Planning Department
200 North Spring Street
Los Angeles, CA 90012

SENT VIA EMAIL: emily.gable@lacity.org

Dear Ms. Gable,

On behalf of Warner Center Association, a voluntary association of property owners and businesses in Warner Center, I want to thank you and your staff as well as LADOT staff in your combined efforts to update the City's Transportation Demand Management Ordinance to promote sustainable transportation in the City of Los Angeles. As you are probably aware, in 2013 the City Council adopted the Warner Center 2035 Specific Plan (the "WC 2035 Plan"), setting forth a blueprint for transit oriented, mixed-use development within the boundaries of the Specific Plan Area.

Given the transit-oriented nature of the WC 2035 Plan and the requirements of the programmatic Environmental Impact Report, the WC 2035 Plan sets forth the requirement that qualifying Projects¹ prepare a Transportation Demand Management (TDM) Plan, or join the Warner Center Transportation Management Organization. Therefore, project applicants may choose to either: 1) prepare and file their TDM Plan with the Los Angeles Department of Transportation for review and approval, pursuant to Sections 7.8.1.1-3 of the WC 2035 Plan; or 2) maintain membership in good standing in a Transportation Management Organization (TMO) or a similar organization that implements the TMO's overall TDM goals and objectives which, at a minimum, meet specifications enumerated in WC 2035 Plan Section 7.8.1.2 (a-f).

As set forth above, the WC 2035 Plan already imposes TDM requirements on Warner Center Projects, consistent with the requirements of the Specific Plan and

¹ Transportation Demand Management requirements are set forth in the WC 2035 Plan for projects that involve: 1) an existing structure of 30,000 SF or more; 2) an addition to an existing structure that will result in a structure of 30,000 SF or more; or 3) any new structure of 30,000 SF or more.

its program Environmental Impact Report. Further and key to that effort has been the establishment of the Warner Center Transportation Management Organization, Warner Connects. Given the robust TDM requirements already in place in Warner Center, and the existence of the TMO, we respectfully request that the Transportation Demand Ordinance be revised to exclude the Warner Center 2035 Plan area from its purview until/unless provisions of the WC 2035 Plan are revised eliminating the TDM requirements.

Please feel free to contact our Executive Director, Brad Rosenheim at Brad@raa-inc.com or by phone at (818) 716-2689 if you would like to discuss this matter further.

Sincerely,

A handwritten signature in black ink, appearing to read "David Allison", with a stylized flourish at the end.

David Allison, Chairman
WARNER CENTER ASSOCIATION

cc: The Honorable Bob Blumenfield, Council District 3
Samantha Millman, President, City Planning Commission
David Somers, Supervising Transportation Planner I, LADOT

SERVING WARNER CENTER FOR OVER 35 YEARS

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(818) 716-2689 • FAX (818) 593-6184 • warnercenterassociation@gmail.com



September 7, 2021

More Song, Planning Assistant

more.song@lacity.org

(213) 978-1319

Dear City Planning Commission,

We are writing to you in support of the proposed 108-unit mixed-use development, including 13 dedicated Very Low Income units and 3,250 square feet of commercial space, at 9500 West Pico Boulevard, cases CPC-2020-5837-DB-CUSPR-VHCA/ ENV-2020-5838-ND. We urge the city to find the project Categorically Exempt from the provisions of CEQA and to approve it with the Density Bonus and additional incentives.

The greater Los Angeles region is facing a severe housing shortage, particularly affordable housing. 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.

This project is in a highly walkable neighborhood, with multiple bus stops nearby and within walking and bicycling distance to shopping, restaurants, parks and recreation centers, and schools. The project will also be 1 mile away from a new Metro Purple Line stop at Wilshire and Rodeo Drive.

It is great to see the developer using the Density Bonus program to bring new homes, including 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 incentives, and find the project Categorically Exempt from the provisions of CEQA.

Best Regards,

Leonora Camner

Leonora Camner
AHLA Executive Director

Jaime Del Rio

Jaime Del Rio
AHLA Field Organizer

Tami Kagan-Abrams

Tami Kagan-Abrams
AHLA Project Director

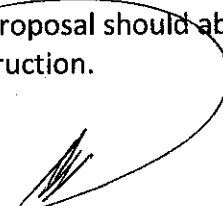
RE: Proposed Project at 9500 W. Pico Boulevard

Dear Mr. Song,

I am the owner of the property just north of 9500 Pico Boulevard, at 1147 S. Beverly Drive. I was made aware of the proposed project as a result of the applicant's outreach efforts. I want to make the Department of City Planning and the City Planning Commission aware that I fully support this project.

This project is attractive and appropriately-placed. It will get rid of a car wash, which is a nuisance because of its traffic and noise generation. Right now, Pico does not meet the potential of what it could be – a great, vibrant commercial corridor. This project helps move Pico in the right direction of realizing its full potential.

This proposal should absolutely receive approval, and we look forward to its timely construction.



Hersel Saeidy

20+ CONSTITUENTS SUBMITTED THE FOLLOWING STATEMENT FOR YOUR CONSIDERATION:

Honorable Councilmember Koretz and Members of the City Planning Commission ,

Los Angeles has a housing crisis, NOT a hotel crisis. Pico-Robertson is already well-served by hotels, with the Carlyle Hotel only blocks away and hundreds of hotel rooms less than a mile away at Pico & Beverly. If the 1434 Robertson site is redeveloped, it should be a mixed-use housing project with small business space at the bottom. As opposed to a hotel development, a mixed-use housing project would ensure existing tenants have the right to return to their homes and require a percentage of the units to be affordable.

The City should follow the lead of the South Robertson Neighborhood Council and oppose this project.



September 7, 2021

Connie Chauv, City Planner

connie.chauv@lacity.org

Dear City Planning Commission,

We are writing to you in support of the proposed 100-unit mixed-use development, including 11 dedicated Very Low Income units and 1,800 square feet of commercial space, at 2111-2139 South Pacific Avenue, cases CPC-2019-4884-CU-DB-SPR/ENV-2019-4885-CE. We urge the city to find the project Categorically Exempt from the provisions of CEQA and to approve it with the Density Bonus and additional incentives.

The greater Los Angeles region is facing a severe housing shortage, particularly affordable housing. 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.

This project is in a highly walkable neighborhood, with a bus stop at its corner and walking and bicycling distance to beaches, shopping, restaurants, parks, and schools.

It is great to see the developer using the Density Bonus program to bring new homes, including 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 incentives, and find the project Categorically Exempt from the provisions of CEQA.

Best Regards,

Leonora Camner

Leonora Camner
AHLA Executive Director

Jaime Del Rio

Jaime Del Rio
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Tami Kagan-Abrams

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CHARLES J. McLURKIN

jamie.hall@channellawgroup.com

*ALSO Admitted in Texas

August 30, 2021

VIA ELECTRONIC MAIL

Members of the City Planning Commission
Ms. Connie Chauv, City Planner, and
Cecilia Lamas, Commission Executive Assistant
Department of City Planning
200 North Spring Street
Los Angeles, CA 90012

RE: 2111 - 2139 South Pacific Avenue, CPC-2019-4884-CU-DB-SPR-RDP, ENV-2019-4885-CE

Dear Members of the City Planning Commission,

This firm represents Citizens Protecting San Pedro. The City is improperly processing the proposed project using an Exemption from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines, Article 19, Section 15332 (Class 32 Infill Development). This letter demonstrates that the proposed project is not eligible for a Categorical Exemption under CEQA. As detailed herein, an Environmental Impact Report (EIR) or Mitigated Negative Declaration (MND) must be prepared for the project, in conformance with the requirements of the CEQA. This letter is in addition to, and augments, public comments already in the record, submitted during the administrative process by Citizens Protecting San Pedro and others. That information is incorporated herein by reference. The full project files are incorporated herein by reference.

1. CEQA STANDARD FOR USE OF A CATEGORICAL EXEMPTION

As indicated in the Hearing Notice for the project, rather than prepare an EIR or MND for the project, the City is improperly processing the project using an exemption from CEQA pursuant to CEQA Guidelines, Article 19, Section 15332 (Class 32 – In-fill Development Projects). This letter provides substantial evidence demonstrating that the project is not eligible for a Class 32 – Infill Development Exemption. Additional substantial evidence has been previously submitted and is contained in the project files. As detailed in CEQA Guidelines

Section 15332, to use a Class 32 Exemption a project must meet the following conditions:

15332. IN-FILL DEVELOPMENT PROJECTS

Class 32 consists of projects characterized as in-fill development meeting the conditions described in this section.

- (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. (Emphasis added)
- (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. (Emphasis added)
- (e) The site can be adequately served by all required utilities and public services

Note: Authority cited: Section 21083, Public Resources Code.
Reference: Section 21084, Public Resources Code.

As detailed herein, the proposed project is not consistent with the applicable general plan designation and all applicable general plan policies, and it is also not consistent with the applicable zoning designation and regulations; therefore, the project does not comply with CEQA Guidelines Section 15332(a).

Also, as detailed in CEQA Guidelines Section 15300.2, there are exceptions to when a Categorical Exemption may be used:

15300.2. EXCEPTIONS

- (a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.
- (b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.
- (c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.
- (d) Scenic Highways. A categorical exemption shall not be used for a project which 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. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.
- (e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant

to Section 65962.5 of the Government Code.

- (f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

The proposed project may not be eligible for a Categorical Exemption pursuant to CEQA Guidelines Sections 15300(b) and 15300(c) due to the potential for cumulative impacts and due to the impacts associated with unusual circumstances. The City cannot act on the project until the appropriate environmental documentation has been prepared and analyzed with respect to Sections 15300(b) and (c).

2. FAILURE TO MEET REQUIREMENTS OF 15332(a) – DUE TO LACK OF CONSISTENCY WITH GENERAL PLAN POLICIES AS WELL AS WITH APPLICABLE ZONING DESIGNATION AND REGULATIONS

The parcels are zoned C2-1XL-CPIO. C2 zoning allows for C1.5 Uses; Retail w/ Limited Manufacturing, Service Stations and Garages, Retail Contr. Business, Churches, Schools, Auto Sales, R4 Uses. The 1XL designation indicates the project parcels are in a height district that allows for a maximum of: Height - 30 ft and FAR - 1.5:1. The CPIO designation indicates the project parcels are in the San Pedro Community Plan Implementation Overlay area (CPIO). Ordinance 185539 enacting the Overlay District is available at:

<https://planning.lacity.org/odocument/213bd163-9baf-45f3-aa8a-01b4a2adbb2d> The current San Pedro Community Plan (Community Plan) was adopted on October 4, 2017. The Community Plan is available at: <https://planning.lacity.org/plans-policies/community-plan-area/san-pedro> The parcels are also in the City's Pacific Corridor Redevelopment Plan Area, available at: <https://planning.lacity.org/plans-policies/overlays/pacific-corridors>

The proposed project is not eligible for a Class 32 exemption because it is not consistent with regulations, the applicable zoning designation, and with General Plan and Community Plan policies.

Consistency With C2-1XL-CPIO Zoning Designation and LAMC Section 12.22 A.25

Table 1 provides a comparison of the proposed project with what is allowed under the C2-1XL-CPIO zoning designation and LAMC Section 12.22 A.25. Section 12.22 A.25(f) of the LAMC contains the list of eight on-menu incentives for affordable housing provision. FAR is an on-menu development standard, which is not allowed to be approved as an off-menu incentive as per LAMC Section 12.22 A.25(g)(3)(i). In addition, the applicant requests an off-menu incentive for a reduction in parking from the 121 parking spaces required by Density Bonus Parking Option 1 and LAMC Section 12.22 A.25(d)(1) to only 80 spaces. There is also a requested off-menu incentive for elimination of loading space requirements under LAMC Section 12.21 C.6. Height is also an on-menu incentive that cannot be approved as an off-menu incentive. In addition, using a Waiver of Development Standard to allow for the increased height appears to be a way for the project to get four, rather than three incentives.

As shown in the table, the project applicant's requested deviations from code are excessive and unpermitted. The project is only eligible for three of the affordable housing incentives and is requesting four. In addition, the project does not comply with the requirements for some of the requested incentives.

TABLE 1 ANALYSIS OF PROJECT'S COMPLIANCE WITH ZONING REQUIREMENTS	
ZONING CODE REQUIREMENTS /1/	PROPOSED PROJECT
Allowed Density is $24,336 \text{ (lot size)} / 400 = 61$ units Very Low Income Units – Density Bonus Allowed per Section 12.22 A.25(c)	Very Low Income Units = 11 Total Units = 100 If project is entitled to a 35% density bonus, this would allow for 82 units. The project includes 100 units and thus is requesting a conditional use permit for an additional 18 units, or a 64% density bonus.
Very Low Income Units – Incentive Allowed per Section 12.22 A.25(e) from menu in Section 12.22 A.25(f)	Allowed Units Without Density Bonus = 61 Very Low Income as Percent of Total Units $(11/100) = 11\%$ Very Low Income as Percent of Total Units excluding Density Bonus units $(11/61) = 18\%$. LAMC Section 12.22 A.25(e) provides for three incentives with provision of 15% very low income units (excluding density bonus units). More than three incentives are being requested.

TABLE 1 ANALYSIS OF PROJECT'S COMPLIANCE WITH ZONING REQUIREMENTS	
ZONING CODE REQUIREMENTS /1/	PROPOSED PROJECT
Height: 30 ft	Inconsistent With Requirements of Incentive Menu Item 4; Applicant is Requesting a Waiver of This Development Standard Which Would Appear to be an Attempt to Circumvent the Number of Allowable Incentives The project height is 45 feet, 5 inches in lieu of the 30 feet otherwise permitted by the C2- 1XL-CPIO Zone and CPIO Section IV- 2.A.2. Section 12.22 A.25(f) Menu Incentive item 5 allows for a percentage increase in the height requirement in feet equal to the percentage of Density Bonus for which the Housing Development Project is eligible. This percentage increase in height shall be applicable over the entire parcel regardless of the number of underlying height limits. The proposed project would thus be eligible for a 35% increase in height from 30 feet to 40 feet 6 inches. This menu item further provides: (i) In any zone in which the height or number of stories is limited, this height increase shall permit a maximum of eleven additional feet or one additional story, whichever is lower, to provide the Restricted Affordable Units. (a) No additional height shall be permitted for that portion of a of a building in a Housing Development Project that is located within fifteen feet of a lot classified in the R2 Zone. (b) For each foot of additional height the building shall be set back one horizontal foot.

TABLE 1 ANALYSIS OF PROJECT'S COMPLIANCE WITH ZONING REQUIREMENTS	
ZONING CODE REQUIREMENTS /1/	PROPOSED PROJECT
	(ii) No additional height shall be permitted for that portion of a building in a Housing Development Project that is located within 50 feet of a lot classified in an R1 or more restrictive residential zone. (iii) No additional height shall be permitted for any portion of a building in a Housing Development Project located on a lot sharing a common lot line with or across an alley from a lot classified in an R1 or more restrictive zone. This prohibition shall not apply if the lot on which the Housing Development Project is located is within 1,500 feet of a Transit Stop but no additional height shall be permitted for that portion of a building in the Housing Development Project that is located within 50 feet of a lot classified in an R1 or more restrictive residential zone. Item (i) would allow for a maximum height of 41 feet. The proposed project exceeds this height. Furthermore, as shown in the ZIMAS records for the project parcels, the project site shares a western property line with parcels zoned R1.5. The proposed project is thus inconsistent with what is allowable under this menu item. Also, the project is not eligible for a waiver as on-menu development standards are not eligible for off-menu incentives.

TABLE 1 ANALYSIS OF PROJECT'S COMPLIANCE WITH ZONING REQUIREMENTS	
ZONING CODE REQUIREMENTS /1/	PROPOSED PROJECT
FAR: 1.5:1	Inconsistent With Requirements of Requested Incentive Menu Item 4 The project's FAR is 3.26:1 This represents a 117 percent increase over the allowable FAR. Per Menu Incentive item 4 the project is entitled to: (i) A percentage increase in the allowable Floor Area Ratio equal to the percentage of Density Bonus for which the Housing Development Project is eligible, not to exceed 35%; (ii) In lieu of the otherwise applicable Floor Area Ratio, a Floor Area Ratio not to exceed 3:1, provided the parcel is in a commercial zone in Height District 1 (including 1VL, 1L and 1XL), and fronts on a Major Highway as identified in the City's General Plan, and a. the Housing Development Project includes the number of Restricted Affordable Units sufficient to qualify for a 35% Density Bonus, and b. 50% or more of the commercially zoned parcel is located in or within 1,500 feet of a Transit Stop/Major Employment Center. A Housing Development Project in which at least 80% of the units in a rental project are Restricted Affordable Units or in which 45% of the units in a for- sale project are Restricted Affordable Units shall be exempt from the requirement to front on a Major Highway. The proposed project does not front on a Major Highway, as identified in the City's General Plan. Pacific Avenue is identified as Avenue II Modified on the San Pedro Community Plan Circulation Map, which is an arterial, not a Major Highway per page 18 of the

TABLE 1 ANALYSIS OF PROJECT'S COMPLIANCE WITH ZONING REQUIREMENTS	
ZONING CODE REQUIREMENTS /1/	PROPOSED PROJECT
	2035 Mobility Plan. Also, the project is not within 1,500 feet of a Metro Rapid Bus stop. It is therefore not eligible for a FAR of 3.26:1. Per Section 12.22 A.25(f)(4) the project only qualifies for a 35% increase in FAR, which would be a FAR of 2.025:1.
/1/ Zoning Code Summary available at: https://planning.lacity.org/odocument/eacdb225-a16b-4ce6-bc94-c915408c2b04/Zoning_Code_Summary.pdf	

Consistency with CPIO

The project site is within Coastal Commercial Subarea A of the San Pedro Community Plan Implementation Overlay District (CPIO).

Chapter IV of the CPIO addresses the development standards for developments within this subarea. As noted on page 28 of the CPIO:

The intent of the supplemental development regulations in this Chapter IV is to create a small-scale pedestrian-friendly corridor that serves the daily needs of residents and employees. These supplemental development regulations create compatible infill development through transitions, scale, massing, and landscaping. Projects within the Coastal Commercial Subareas A and B (see Figure IV) **shall** comply with the applicable supplemental development regulations in this Chapter IV. (Emphasis added).

The proposed project is inconsistent with both the letter and intent of the CPIO for this area. As shown in **Table 2**, the proposed project exceeds the building height and building density and intensity standards for the area included in the CPIO.

TABLE 2 ANALYSIS OF PROJECT'S COMPLIANCE WITH CPIO REQUIREMENTS FOR SUBAREA /1/	
CPIO REQUIREMENTS FOR SUBAREA	PROPOSED PROJECT
A. Building Height. In addition to any regulations set forth by the underlying zone and the LAMC, Projects shall comply with the following building height regulations: 2. Maximum Height: (a) The maximum height for Height District 1XL shall be 30 feet.	Inconsistent The proposed project is 45 feet, 5 inches in height.

B. Building Density & Intensity. In addition to any regulations set forth by the underlying zone and the LAMC, Projects shall comply with the following building density and intensity regulations: 1. The maximum FAR shall be 1.5:1.	Inconsistent The project's FAR is 3.26:1. This represents a 117 percent increase over the allowable FAR. This is also in excess of the FAR on-menu density bonus provided in LAMC Section 12.22 A.25(f) for projects providing Very Low Income Housing Units.
/1/ Pages 30-34 CPIO Ordinance available at: https://planning.lacity.org/odocument/213bd163-9baf-45f3-01b4a2adbb2d	

Inconsistency With General Plan Policies

The proposed project is inconsistent with the following General Plan policies:

General Plan Framework

The General Plan Framework, adopted in December 1996, provides long term guidance on land use issues for the entire City.

***Policy 3.1.8** Consider the formulation of plans that facilitate the local community's identification of precise uses, densities, and design characteristic for development and the public streetscape for neighborhood areas smaller than the community plans, provided that the Framework Element's differentiation and relationship among land use districts are generally maintained, there is no significant change in the population and employment capacity of the neighborhood, and there is no significant reduction in overall housing capacity.*

The standards in the Community Plan and CPIO address issues raised by stakeholders in the community while balancing the need to retain housing capacity. Site plan and building design regulations mitigate impacts of massing on the shade, scale, shadow, aesthetics, and public streetscape. The proposed project is inconsistent with the standards included in the CPIO.

***Objective 5.1** Translate the Framework Element's intent with respect to citywide urban form and neighborhood design to the community and neighborhood levels through locally prepared plans that build on each neighborhood's attributes, emphasizes quality of development and provide or advocate "proactive" implementation programs.*

The Community Plan and CPIO standards are tailored to the community and respond to the local context. The proposed project is inconsistent with those standards.

General Plan Housing Element

***Policy 2.8.1.** Establish individual community visions that retain and enhance community character through the Community Plan Update Program and the Framework Element.*

The standards within the Community Plan and CPIO were developed to specifically

address the needs of the area. The proposed project is inconsistent with the standards established in the Community Plan and CPIO.

San Pedro Community Plan

As detailed on page 3-24 of the Community Plan, the project site is within the area designed as Neighborhood Commercial:

Neighborhood Commercial Districts

Several Neighborhood Commercial Districts are located throughout the community providing daily convenience services to people living in nearby residential areas. Typical establishments found in these areas include markets, barber and beauty shops, laundromats and dry cleaners, restaurants, convenience stores, coffee shops and small professional offices. These districts contain mostly small-scaled, 1 to 2 story buildings with local businesses that provide goods and services to the adjacent neighborhoods and community at large. Neighborhood Commercial Districts include the following:

- Gaffey Street between 5th and 19th Streets
- 9th Street between Meyler Street and Pacific Avenue
- Pacific Avenue and “Welcome Gateway”
- Western Avenue and 25th Street
- Weymouth Corners
- Park Plaza and Harbor Cove

Page 3-25 of the Community Plan describes the Neighborhood Commercial area containing the project as follows:

Pacific Avenue and “Welcome Gateway”

Pacific Avenue between 9th and 25th Streets is a mixed-use area with street-fronting retail, restaurants, bars, banks and auto-related uses. A prevailing two-to three-story street wall at 9th Street gradually loses consistency as it heads away from the Downtown core, with several corner shopping malls, parking lots and auto repair businesses located between 14th Street and 19th Street. The district also includes a public elementary school and some multi-family residential uses. Between Oliver and 3rd Streets, the mix of uses is similar to those found along the southern portion of Pacific Avenue. This area is also one of the primary entry points into the community from north of San Pedro as well as Long Beach. Thus, this area provides an opportunity to better identify a key entryway into San Pedro beginning at about Oliver Street and extending into Downtown.

The San Pedro Community Plan is incorporated by reference. The proposed project, due to its mass, height and scale in excess of the 30 foot height and FAR of 1.5:1 for the Community Plan subarea, and its adjacency to residential uses, is inconsistent with the following land use policies in the San Pedro Community Plan for commercial areas, including Neighborhood Commercial areas, such as the project area:

LU 5.4 Appropriate transitions. New development should respect and complement the architectural and building patterns of surrounding existing residential areas. New buildings that abut residential zones or are adjacent

to residential neighborhoods that have lower development intensities and building heights should ease the scale of transition through use of downsizing scale, massing, heights, or setbacks.

LU. 5.5 Complementary residential uses. Residential uses in commercial areas should complement and enhance commercial districts with compatible design, entrances, scale, massing and continuation of the streetwall.

LU 5.7 Strategically locate new large projects. Allow large projects in appropriate locations, and provided that projects do not interrupt community fabric, the street grid, designated public views, or the viability of commercial areas, and that those facilities are designed to be compatible in scale and character with surrounding uses.

LU 6 Attractive, pedestrian-friendly Neighborhood Districts that serve surrounding neighborhoods and businesses as local gathering places where people shop and socialize.

LU6.1 Neighborhood services. Encourage the retention of existing and the development of new commercial uses that are primarily oriented to the residents of adjacent neighborhoods and promote the inclusion of community services (e.g., childcare and community meeting rooms).

Because the project is not consistent with the Community Plan standards specifically adopted in order to ensure compliance with these policies and objectives, it is not consistent with the General Plan and San Pedro Community Plan policies and objectives and would result in a land use impact. It therefore does not qualify for a Class 32 Exemption, which requires that a project be consistent with the applicable general plan designation **and all** applicable general plan policies as well as with applicable zoning designation and regulations. (Emphasis added). In addition, a SPR (Site Plan Review) cannot be approved as the findings regarding consistency with the Plans cannot be made. Furthermore, the case number for the project originally included an entitlement for RDP, indicating an entitlement request to determine compliance with the Pacific Corridor Redevelopment Plan. The entitlement was later withdrawn in error.

As detailed herein, the proposed project is not consistent with the applicable general plan designation and **all** applicable general plan policies as well as with the applicable zoning designation and regulations, and therefore it does not comply with CEQA Guidelines Section 15332(a). The use of a categorical exemption is not appropriate for the proposed project; additional CEQA review is required.

I may be contacted at 310-982-1760 or at jamie.hall@channellawgroup.com if you have any questions, comments or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jamie T. Hall', written in a cursive style.

Jamie T. Hall

Commissioners
Los Angeles Planning Commission

RE: CPC-2019-4884-CU-DB-SPR

I am asking you to oppose this project, for four reasons:

1. The project does not provide adequate parking. This part of San Pedro was built when most people had only one car and the streets are very narrow. On-street parking is very difficult and is already at capacity. Additionally, public transportation is almost non-existent and services, such as a grocery store, are not in walking distance. **It is unconscionable to build housing in this area with less than one parking spot per unit.**
2. The height is not appropriate for this neighborhood. At this point, Pacific has transitioned from being a commercial street to being primarily a single family residential area with a scattering of small multi-family units, none over 2 stories. **The proposed development does not fit the context of this neighborhood.**
3. Traffic. Pacific is one lane in both directions even though it is a main access for Ft Mac Arthur, Cabrillo Beach, and Point Fermin Park. Twenty-second Street is a major thoroughfare connecting Alta Sea, the new Public Market, Crafted and Harbor Blvd to Pacific, Gaffey, and Western. This intersection is particularly impacted on weekends during summer. Traffic will increase significantly with the build-out of Alta Sea and West Harbor. Additionally, any analysis of traffic must take into account the cumulative impact of both this project and the one recently approved at 13 and Pacific. **The proposed project will create a traffic nightmare.**
4. Finally, we worked very hard for a number of years on developing a good community plan. **The administrative decisions sought for this development seriously undermine the community plan, particularly the FAR changes, height increases, and parking reductions.**

Although it does not substitute for the lack of adequate parking, I do want to applaud the developers for their proposals for alternative forms of transportation, however I would suggest that the proposed bus passes be given to individuals who agree to not have a car regardless of the number of bedrooms in the unit and for only as long as they do not purchase a car.

I would like to see this block developed but this is the wrong project. A small lot development such as the one this same developer is constructing on 10th Street would be more appropriate.

Diana Nave
543 W. 36th St.
San Pedro
310-831-1975

Danial Nord
2130 South Pacific Avenue
San Pedro CA 90731

September 6, 2021

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

RE: 2111–2139 South Pacific Avenue, San Pedro
CPC-2019-4884-CU-DB-SPR-RDP and ENV-2019-4885-CE

Honorable City Planning Commissioners,

My community supports development of affordable housing in San Pedro. However, the CPC must ensure that the proposed project at 2111–2139 South Pacific Avenue is revised before it receives Commission approval, because the developer is attempting to circumvent the following legal requirements:

- Tandem parking is not allowed because the project is not on a major public transit line and therefore does not qualify for Transit Oriented Communities (TOC) tandem parking allowances. The project's subterranean parking must be redesigned to comply with non-TOC parking requirements (see exhibit 1) (also see letter submitted to CPC dated September 6, 2021 from Traffic Engineer Denis Bilodeau, PE - Infrastructure Group Inc.).
- A Categorical Exemption from the California Environmental Quality Act (CEQA) must be denied because the project is not "consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations."
- A Categorical Exemption from CEQA must also be denied because the developer is "piecemealing" the cumulative impacts analyses: their two Pacific Corridor projects are being processed simultaneously, encompassing a whole action, and they must be reviewed as a package.
- A Categorical Exemption from CEQA must also be denied due to San Pedro's well-documented Port-related environmental hazards (see exhibit 2), which are "unusual circumstances" creating the reasonable possibility of significant effects. The community has already commissioned expert noise, air quality, and traffic evaluations in the Pacific Corridor, all confirming significant adverse impacts from a project of this type and size.

** For additional information and citations with respect to the CEQA violations of this project, please refer to attorney Jamie Hall/Channel Law Group's letter to Members of the City Planning Commission dated August 30, 2021. As detailed therein, the proposed project is not consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations,

and therefore it does not comply with CEQA Guidelines Section 15332(a). The use of a categorical exemption is not appropriate for the proposed project; additional CEQA review is required.

ADDITIONAL ISSUES

- **Neighborhood Council Opposition**

The Coastal San Pedro Neighborhood Council (CSPNC) passed a motion on November 18, 2019 (included in the DCP Recommendation Report) offering project support if parking, zoning, and environmental conditions were met, and the affordable housing would be increased. None of the conditions were addressed by the developer. Instead, they requested additional concessions/entitlements including a reduction in retail space and waiver of the loading area requirement. Therefore the Coastal San Pedro Neighborhood Council continues to strongly oppose the project in its present form.

- **Congresswoman Barragán's Serious Concerns**

Congresswoman Nanette Diaz Barragán, who represents California's 44th Congressional District that includes San Pedro, wrote a strong letter of support for her constituents (see exhibit 3) regarding the planned housing development at 1309-1331 Pacific Avenue in San Pedro - the developer's almost identical 'sister' project just seven blocks away. Congresswoman Barragán cited:

- An inadequate amount of affordable units
- Concerns regarding the potential for the displacement of residents
- The environmental impacts of the project

The letter and the Congresswoman's call for the "development to undergo the proper vetting" were ignored by the LA City Council, and now with a second project underway, the impacts will double. We need the CPC to hear Congresswoman Barragán and support San Pedro's already overburdened community.

- **Inadequate Affordable Housing - Glut of Market Rate Housing**

As of September 6th, 2021 there are 258 vacant market rate apartments languishing in San Pedro, with more than 1,200 additional market rate units proposed for our Downtown/Pacific Corridor area. Angelenos with the luxury of choice are simply not moving to LA's "Diesel Death Zone" adjacent to the toxic port. It is unreasonable to enable developers to continue building oversized, Community Plan and CEQA-violating projects in San Pedro - which sit empty. We need more affordable housing. Only 11%, or 11 Very Low Income units out of 100 total project units is a very low ratio relative to other density bonus projects in the City. This must be increased to at least 24 units, as per the request of the Coastal San Pedro Neighborhood Council.

- **High Displacement Pressure in San Pedro**

In January 2021 LA's Department of City Planning (DCP), which answers to the Mayor, emailed their monthly newsletter announcing "the newly established Office of Racial Justice, Equity, and Transformative Planning." But the Mayor's team also created *The Los Angeles Index of Displacement Pressure* database, which shows the high displacement pressure on Pacific Avenue in San Pedro (see exhibit 4). The displacement pressure maps "capture areas with a high concentration of existing

residents who may have difficulty absorbing massive rent increases that often accompany 'revitalization' [gentrification]." Contrary to stated goals, the City has documented the significant harmful impacts of unrestricted, largely market rate development in our 82% non-white low income community.

We are asking the CPC to stop enabling speculators to evade Community Plans, environmental laws, and zoning restrictions for personal enrichment, which will ultimately displace longtime residents in our neighborhoods.

- High Injury Network

The proposed project is located in the City of LA's High Injury Network (HIN), which spotlights streets with a high concentration of traffic collisions that result in severe injuries and deaths, with an emphasis on those involving people walking and bicycling. Nearly half the people killed in traffic crashes were pedestrians and cyclists. Residents of under-served communities like San Pedro are disproportionately killed in these traffic crashes, and an alarming number of those killed are children and older adults.

With children walking to and from the 15th Street Elementary School on Pacific Avenue, this is a very serious concern. And the inadequate/unlawful parking scheme of the proposed project will create an even more dangerous situation. The unbundled parking will turn many tenants to the street to look for free parking, especially those with financial limitations. Frustrated tenants will certainly drive around in circles looking for parking, which will compound the hazards in the High Injury Network. These very real issues could be mitigated, in part, through limiting the project's size and providing required parking as per code.

RECAP

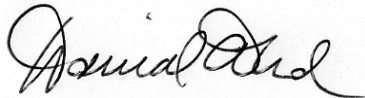
Members of the City Planning Commission: Please withhold approval of the project at 2111–2139 South Pacific Avenue until modifications are made so that it conforms with CEQA and Community Plan Requirements, and reasonably addresses the dire need for affordable housing in San Pedro.

The Coastal San Pedro Neighborhood Council, our Congresswoman, and the majority of community members oppose the project as planned. In fact, the Recommendation Report states (re: the 9/9/21 public hearing), "Planning Staff received approximately 50 letters/emails in opposition of the project, and one (1) email in support of the project."

We respectfully ask CPC to stand up for low-income communities of color like ours in San Pedro's Pacific Corridor, rather than supporting the developer's manipulations that will inevitably harm us. We are only asking for this project to be modified to conform to the law and CEQA, which despite numerous erroneous assertions, it does not.

Thank you for your consideration.

Sincerely,



Danial Nord

**INFORMATION BULLETIN / PUBLIC - ZONING CODE**

REFERENCE NO.: L.A.M.C. 12.21A5

Effective: 10-01-1999

DOCUMENT NO.: **P/ZC 2002-001**

Revised: 01-01-2017

Previously Issued As: IB ZO-1, RGA 3-72

PARKING DESIGN**GENERAL REQUIREMENTS****E. TANDEM PARKING STALLS**

1. Tandem parking stalls are permitted in public garages and public parking areas providing an attendant. A "Covenant and Agreement to Provide Parking Attendant" will be required.
2. Tandem stalls are permitted in private parking garages and private parking areas provided:
 - a. At least one parking stall per dwelling unit and all stalls required for any guest parking shall be individually and easily accessible.
 - b. At least one standard stall per dwelling unit shall be provided.
3. Tandem parking shall be limited to a maximum of two cars in depth, in a private garage or private parking area, except for additional parking required in accordance with Section 12.21A17(h) or 12.21C10(g)(4).
4. When determining access aisle widths for tandem parking having both standard and compact stalls in tandem, the aisle widths for standard stalls shall be used.

F. PARKING STALL LOCATION

1. Each parking stall shall be so located that no automobile is required to back into any public street or sidewalk to leave the parking stall, parking bay, or driveway, except where such parking stalls, parking bays, or driveways serve not more than two dwelling units and where the driveway access is to a street other than a major or secondary highway.
2. No automobile parking space shall be provided or maintained within the required front yard of an A or R zoned lot except for additional parking provided in accordance with Sections 12.21A17(h) or 12.21C10(g)(2).
3. No parking stall may be located within a 5 foot side yard along the side street lot line of an A or R zoned corner lot.

G. DRIVEWAY WIDTHS AND LOCATIONS

1. Department of Transportation approval for the location of the driveways shall be obtained on lots located in a P (including any combination with an A or R Zone) or PB Zone, for all residential driveways serving two or more dwelling units which front on major and secondary highways and for all new driveways serving all other uses.
2. 9 ft. minimum in the A, RE, RS, R1, RU, RZ, R2, RMP and RW Zones.
3. 10 ft. minimum in all other zones and when serving an apartment house in the R2 Zone.

EXHIBIT 2

ENVIRONMENTAL INJUSTICE IN SAN PEDRO - FACTS AND MAPS:

- The US EPA lists the area for 1309-1331 Pacific and 2111-2139 Pacific as among the worst in the nation in the categories of:

Environmental Indicators (map 1*)

Demographic Indicators (map 2*)

Environmental Justice Indexes (map 3*)

- The California EPA has identified the project area as:

an SB 535 Disadvantaged Community (map 4*)

among the neediest and most at-risk neighborhoods from pollution
(map 5*)

- The South Coast AQMD's MATES IV Study lists the neighborhood as:

**in the highest category for carcinogenic risk from exposure to air
toxins and noxious ultrafine particle concentrations** (map 6*)

- The LA County Department of Public Health lists Port-adjacent communities as:

**having the highest numbers of Childhood Asthma cases in the City of
LA** (map 7*)

*** see corresponding graphic maps in "EXHIBIT E - PUBLIC
CORRESPONDENCE" - City Planning Recommendation Report)**

A USC Annenberg Center for Health Journalism article states: "... the intense pollution that emanates from the nation's largest port compromises the health of nearby communities... Asthma, sleep deprivation, hypertension, cancer: all have been linked to living near the Port..." and cites the disproportionate "burden of disease" in communities like San Pedro.

EXHIBIT 3

NANETTE DIAZ BARRAGÁN
44TH DISTRICT, CALIFORNIA
[FACEBOOK.COM/CONGRESSWOMANBARRAGAN](https://www.facebook.com/CONGRESSWOMANBARRAGAN)
[TWITTER: @REPBARRAGAN](https://twitter.com/REPBARRAGAN)

COMMITTEE ON ENERGY AND COMMERCE



Congress of the United States
House of Representatives
Washington, DC 20515

WASHINGTON OFFICE:
2246 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
(202) 225-8220

DISTRICT OFFICES:
302 W. FIFTH STREET, SUITE 201
SAN PEDRO, CA 90731
(310) 831-1799

701 E. CARSON STREET
CARSON, CA 90745

8650 CALIFORNIA AVENUE
SOUTH GATE, CA 90280

June 1, 2021

Los Angeles City Council
200 N Spring St.
Los Angeles, CA 90012

Dear Honorable Members of the Los Angeles City Council,

As the Representative for California's 44th Congressional District, I write to you to voice my support of my constituents' concerns regarding the planned housing development at 1309-1331 Pacific Avenue in San Pedro. Though this proposed development is a private endeavor, it has given me pause on the following grounds:

- An inadequate amount of affordable units
- Concerns regarding the potential for the displacement of residents
- The environmental impacts of the project

We all know that housing is a serious challenge in Los Angeles and every community deserves to experience equitable development. However, this kind of development, which is not in keeping with the San Pedro Community Plan agreed upon by my constituents, provides an inadequate number of affordable units. San Pedro already possesses hundreds of luxury market rate units to which this development would add without offering the residents of San Pedro a meaningful solution to the growing difficulty of living affordably in this city that we all love.

Another item of deep concern to me is this project's potential for driving displacement in the San Pedro community. The Mayor's Los Angeles Innovation Team Index has shown that the residents within the area of San Pedro in which this project is planned are at the highest risk of displacement. Building more luxury housing in working-class neighborhoods brings a rush of speculative investment that drives up rental costs and, in turn, prices many of my constituents out of their neighborhoods only adding to growing affordability concerns for all renters.

Lastly, this development has shown the potential to increase vehicle trips to and from the site by many hundreds daily, further impacting an area of my district already hit by increased risk of cancer and respiratory illness due to the advanced levels of diesel and other particulate matter in the air residents breathe.

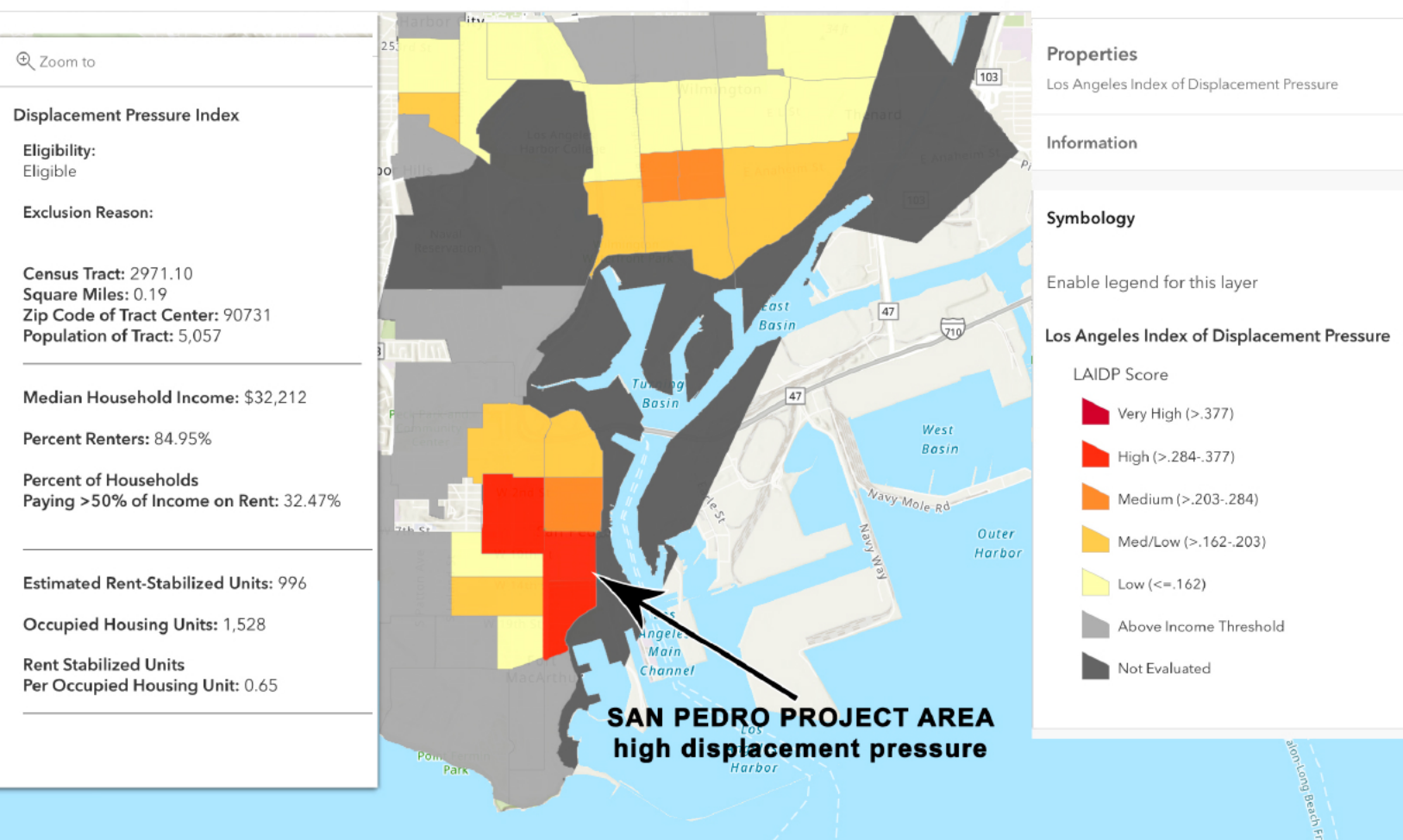
I therefore urge the City Council to recognize the valid concerns of my constituents and ensure that this development undergoes the proper vetting by the appropriate authorities as well as members of the community in which it is planned to be located.

Sincerely,

A handwritten signature in blue ink that reads "Nanette Diaz Barragan".

Nanette Diaz Barragan
Member of Congress

The Los Angeles Index of Displacement Pressure from the Mayor's Los Angeles Innovation Team database



The Mayor's displacement pressure maps "capture areas with a high concentration of existing residents who may have difficulty absorbing massive rent increases that often accompany 'revitalization' [gentrification]." The City itself has documented the significant negative impacts of projects like 1309-1331 and 2111-2139 Pacific Avenue on the Pacific Corridor community.

Lower- and middle-income people of color and immigrants are suffering the worst in the most extremely gentrified areas.

An Opportunity to Lead:

Armed with data from the Mayor's own i-team, our politicians can "become innovative leaders by growing a metropolis in a way that protects its senior citizens, immigrants, teachers, artists, people of color, and many others from displacement and gentrification. Progress is not progress if everyone is not included in that progress."

F R A N S I E G E L
2130 S. Pacific Avenue San Pedro, California 90731
Tel: 310-514-8496

To: Honorable City Planning Commissioners
From: Fran Siegel
RE: case number: CPC-2019-4884-CU-DB-SPR
Date: September 6, 2021

As a San Pedro small creative business owner, homeowner, and a professor at California State University Long Beach, I favor responsible and holistic development in our community. But because there is such a big discrepancy between what the developers (RKD 2111 Pacific, LLC) have presented and what our community needs, I strongly oppose the Categorical Exemption at 2111-2139 S. Pacific Avenue. I am writing this letter so that our Planning Commissioners may base their decisions on the following facts:

This project does not conform to the San Pedro Community Plan, CPIO or THE PACIFIC CORRIDOR REDEVELOPMENT PLAN which is valid till 2033 and was deliberately ignored by the developers and city planning. The developers have been made aware of these errors and that there needs to be a re-design for compliance which they have attempted to work around because they perceive lobbying to be cheaper than working with our community's regulations.

The Project is approximately 90% market rate housing BUT there are already hundreds of market-rate apartments sitting empty in San Pedro. As of April 1st, 2021, there were over three hundred market-rate vacancies here, with more than 1,000 additional market rate units in development in the Pacific Corridor area. These hundreds of apartments are empty and languishing. **We need more AFFORDABLE HOUSING.**

Although the same developers are proposing two projects on this stretch of Pacific with over 100 units each, the **cumulative impact** of these multiple projects is not being addressed. While Pacific Ave. is designated as an official Tsunami evacuation route, the developers have been mistakenly representing it as a transportation corridor to avoid adequate parking needs. But the Silver Line is not a high-capacity people-mover nor designated to become a metro train. As one of the artists commissioned for a Metro Wilshire station, I understand density housing. Outrageously, the parking that they are proposing is tandem and 'unbundled. Every unit must be provided with at least one parking space! Otherwise, hundreds of residents (between this building and the developer's same-sized sister project at 13th + Pacific) are likely to be driving around looking for free street parking in a neighborhood that already has a parking problem.

Please review **Congresswoman Barragan's** June 1, 2021 letter about the developer's sister project where she expresses her deep concern about community displacement, the lack of affordable units and environmental impact among other things.

Please also review the October 2020 **Coastal San Pedro Neighborhood Council Resolution** in opposition to this project. I have summarized their recommendations below:

1. Parking as per the requirements of LAMC 12.21 A 4, loading space as required by LAMC 12.21 C.6, no bike parking to replace car parking spaces, no tandem parking and no unbundled parking
2. Height limit of 30 feet as per CPIO Section IV-2.A.2 zoning for C2-1XL
3. FAR (Floor Area Ratio) of no more than 1.5:1 as per the C1-1XO CPIO zoning
4. Setbacks, step backs and transitions as required in the LAMC and the Plans

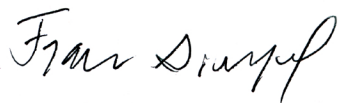
5. Full compliance with the Open Space requirement
6. Limit density to 61 units as per code (24,336 square foot lot size divided by 400)
7. Affordable units to be at least 20% of total units
8. Incorporation of native plants into the landscape plan as per the San Pedro Urban Greening Plan
9. Street improvements such as widening and necessary curb cuts for buses, as well as tenant pull in areas, to ease traffic flow
10. Infrastructure upgrades - water, sewer, street, power and cable
11. Replace the existing trees on site and reuse the existing palm trees off site
12. Conformance with the San Pedro Community Plan, the CPIO and the Pacific Corridor Redevelopment Plan

For all these reasons our community is overwhelmingly opposed to this project in its current form. The initial in-person hearing in January 2020 was so full of community opposition that droves of people spilled out into the hallways. On October 28, 2020, the City Planning hearing was equally rejected by this community. On August 11th the developers then presented the same PowerPoint to the Land Use Committee, and they received the same negative response.

I do support the development of a housing project if the developers abide by the city's regulations with each of the proper reviews and is amended with the Coastal Neighborhood Council recommendations and other concerned stakeholders. While the developers appear to be tone deaf and may have been promised goodies by our Councilman (in exchange for?), I hope that the Planning Commission will honor the law and our community's concerns and **will not rubber stamp a Categorical Exemption.**

Thank you in advance for your serious attention to this matter.

Sincerely,

A handwritten signature in cursive script, reading "Fran Siegel".

Fran Siegel



Planning CPC <cpc@lacity.org>

please distribute to CPC for 9/9 hearing: agenda item 8 - CPC-2019-4884-CU-DB-SPR

1 message

Heidi Tinsman <hetinsma@uci.edu>
To: cpc@lacity.org

Mon, Sep 6, 2021 at 2:31 AM

TO: Honorable City Planning Commissioners

FROM: Heidi Tinsman, resident, San Pedro

RE: CPC-2019-4884-CU-DB-SPR

I write to strongly oppose the current City plan for a housing development at 2111-2139 Pacific Avenue, San Pedro.

I am a professor at the University of California and have lived at [550 West 40th Street](#), San Pedro, for over 25 years. I have a deep commitment to social justice and equitable urban development in the City of Los Angeles. Let me be very clear: I strongly support building more housing in my neighborhood. We desperately need more affordable housing that can sustain a diverse community.

However the current plan for 2111-2139 is only 10% affordable units, rather than the 20% required by the San Pedro Community Plan. San Pedro already has an abundance of empty at-market apartments for sale. It needs more affordable units, and a better ration of market/subsidized units. Moreover, this housing development includes woefully inadequate and for-profit parking arrangements in an area that is already very underserved by public transportation. It will create terrible traffic and parking problems.

The current 2111-2139 plan requires revision because it does not adhere to:

- the San Pedro Community Plan
- the San Pedro Community Plan Implementation Overlay District (CPIO)

- the Pacific Corridor Redevelopment Plan (valid until 2033 as confirmed by the city)
- the City's Density Bonus regulations and other applicable land-use laws

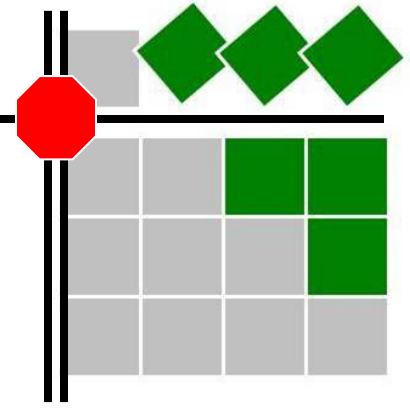
Thank you for your consideration.

Heidi Tinsman

Resident: 550 West 40th Street, San Pedro

INFRASTRUCTURE GROUP, INC.

2672 N. Vista Crest Road
Orange, CA 92867
(714) 749-6386



September 6, 2021

City of Los Angeles
Department of City Planning
Los Angeles, CA 90012

Subject: 2111 - 2039 South Pacific Avenue Residential Project
Case Number: CPC-2019-4884-CU—DB-SPR

The City is using CEQA Guidelines § 15332 (Class 32 Categorical Exemption) for infill housing. In order to utilize this exemption, “the project is consistent with the applicable general plan designation and all general plan policies, as well as with zoning designation and regulations.” That is not the case. A waiver for building height is being granted, in addition to the other three incentives as provided in the density bonus law. Therefore, the building is not consistent with zoning regulations, absent a waiver. This makes it ineligible for a Class 32 exemption.

PARKING

The number of parking spaces and configuration of the spaces fails to conform to the municipal code. Namely, the number of accessible stalls, and the width of the compact stalls. The parking structure stalls are “unbundled”, meaning that the stalls for use on a fee basis and are not associated with any specific unit. Tandem stalls are proposed in an operation where there is no valet, and spaces are for rent and unassigned. This proposed configuration is not functional and does not comply with the zoning code. Tandem spaces are only allowed when “At least one parking stall per dwelling unit and all stalls required for guest parking shall be individually and easily accessible”. And “At least one standard stall per dwelling unit shall be provided”. This parking lot is unbundled, and one stall is not assigned or provided per unit. Therefore tandem spaces should not be permitted. The applicable zoning code is below. The applicable pages from the LA Building and Safety informational bulletin are attached.

Informational Bulletin-LA Building and Safety Department

E. TANDEM PARKING STALLS

1. Tandem parking stalls are permitted in public garages and public parking areas providing an attendant. A “Covenant and Agreement to Provide Parking Attendant” will be required.
2. Tandem stalls are permitted in private parking garages and private parking areas provided:
 - a. At least one parking stall per dwelling unit and all stalls required for any guest parking shall be individually and easily accessible.
 - b. At least one standard stall per dwelling unit shall be provided.
3. Tandem parking shall be limited to a maximum of two cars in depth except for additional parking required in accordance with Section 12.21A17(h).
4. When determining access aisle widths for tandem parking having both standard and compact stalls in tandem, the aisle widths for standard stalls shall be used.

The site plan also fails to identify the location of the required 4 EV charging stalls & 26 EV capable stalls. The only identified EV stall is also reserved for the car share program.

The use of unbundled parking and tandem parking leads to an absurd result. 21 of the parking spaces are essentially unusable as they are behind another unbundled space.

The report states the applicant is opting for the **Density Bonus Parking Option 1**, which requires parking to be set by a dwelling unit basis. This equates to a total of 121 parking spaces. However, they further state they will also be using the **Bicycle Parking Ordinance, LAMC Section 12.21.A.4**, which allows affordable residential projects to reduce required vehicle parking by up to 10 percent, bringing the parking spaces down by 13 spaces to a total of 109 spaces. The applicant is proposing 84 spaces.

LA City Ordinance 179681, amends Section 12.22, 12.24, 14.00, and 19.01 of the Los Angeles Municipal Code to implement Density Bonus program as required by State law., "Housing Development Project that is for sale or for rent and qualifies for a Density Bonus and complies with this subdivision may be provided by complying with whichever of the following options requires the least amount of parking: **applicable parking provisions of Section 12.21 A.4 of this Code, OR Parking Option 1 OR Parking Option 2, below.**"

The applicant is double dipping on the parking reduction, which is not allowable. Therefore, the 109 required parking spaces cannot be reduced thus making the 84 proposed parking spaces not enough for the housing development.

Loading Space

LAMC Section 12.21 C.6 requires that a loading space be provided and maintained for a building with a commercial use that is located on a C or M Zone abutting an alley. As a mixed-use building with a commercial component at the ground floor on a C2-1XL-CPIO zoned lot adjacent to an alley, the project is required to provide a loading space with a minimum height of 14 feet, be accessible through a usable door not less than 3 feet in width and not less than 6 feet 6 inches in height, with a minimum area of 400 square feet, and a minimum width of 20 feet as measured along the alley. The applicant has requested to eliminate the loading space requirements of LAMC Section 12.21 C.6, and contends that the locational requirements along the alley will affect the residential units on the ground floor. The applicant instead proposes a loading space in the subterranean parking garage which further reduces the number available to the residents. The applicant has stated, without substantiation, that up to 2 dwelling units may be lost to comply with the code. This is an absurd argument. Compliance with any code requirements will result in less dwelling units.

Infrastructure Group Inc.

A California Corporation

Denis Bilodeau

Denis Bilodeau, PE





CPC-2019-4884-CU-DB-SPR - 2111 S. PACIFIC AVE SAN PEDRO, CA

Noel Gould <aquarianstudios@hotmail.com>
To: Planning CPC <cpc@lacity.org>
Cc: Connie Chauv <connie.chauv@lacity.org>

Tue, Sep 7, 2021 at 12:40 AM

Honorable City Planning Commissioners:

This project shares many of the same issues with [1309-1331 S. Pacific Ave](#), the sister project you already approved, only in the case of 2111 S. Pacific Ave, the situation is much worse.

When you heard 1309-1331, a project by the same entitlement seeker, you gave the impression by your action, that the approval was ministerial in nature; that none of the massive community out pouring against the project, the three San Pedro Neighborhood Councils, and solid and detailed legal and technical evidence provided was taken into account when you rendered your decision to approve the project, and now the City is embroiled in a lawsuit for violating the CEQA in their approval of this project.

It was clear that CD 15 Councilman Joe Buscaino, who is now running for mayor, let it be known that he wanted this project approved. It's not surprising considering that the principal of RK 13... Adam O'Neil and Joe Buscaino served on the LAPD at the same time.

Both 1309-1331 S. Pacific, which you approved, and 2111 S. Pacific are projects where the applicant's business model is to acquire the maximum number of entitlements and then sell the entitled project to a builder, neither of whom have any stake in our community except to extract massive profits at our expense, and they're not interested in building the kind of development that we need and want but only the kind of development that delivers the stratospheric returns they promise their fund rise investors.

Is this what the City Planning Commission is in the business of supporting?

We need and want development, but we already have a massive glut of vacant market rate housing that made big profits for the developers but did nothing to provide the kind of housing we need and want.

The project at [2111 S. Pacific Ave](#) is 90% market rate, massively under parked, and the parking that is provided is largely tandem and unbundled in a neighborhood where there is already next to no available street parking without this development, and with this development so under parked, the street parking will be abysmal. There's no open space, the

FAR is dramatically more than what's allowed, the height is 15.5 feet greater than what's permitted, traffic studies haven't been properly done, air quality damage hasn't been properly mitigated, and both 1309-1331 S. Pacific and 2111 S. Pacific are bookend projects by the same developer, only seven blocks apart, that must be considered together since they are creating very significant cumulative impacts and setting a precedent for all the lots in between these two projects that have developers waiting in the wings to see what YOU decide is acceptable for our community.

Furthermore, the nearly insignificant amount of very low income housing, eleven units or 11%, should be dramatically increased. The Pacific Corridor Redevelopment Plan, which they are ignoring, requires no less than 15% affordable units, and our community needs a much wider range including very low income, low income, moderate rate, work force rate, and lastly market rate, which again, we already have a glut of.

The Coastal San Pedro Neighborhood Council has already submitted two detailed motions describing, after much community input, what is acceptable for our community, and the CSPNC is a branch of Los Angeles City government that is the direct Liaison from our community to other governing bodies and decision makers.

Since the CSPNC is the most direct channel of communication regarding our Community's needs, our motions should carry the most weight in your decision-making process, not outside developers who have no stake in our community, who don't live here, and who wouldn't choose to live in the buildings they aim to entitle and will sell to other developers who also have no stake in our community.

When you hear [2111 S. Pacific Ave](#) on Thursday September 9th, you have a fiduciary duty to our Community to deny this project as proposed and insist that these entitlement seekers either implement the requests detailed in our Coastal San Pedro Neighborhood Council motions or sell the property to a developer who will.

Enough is enough! We are NOT NIMBYS! We want and need development, but we need development that provides what our community needs, not what developers need to maximize their profit dollars!

Sincerely,
Noel Gould
Chair,
Coastline and Parks Committee
Sunken City ad hoc Committee
Member,
Planning, Land Use, and Transportation Committee
Environment and Sustainability Committee
Administrative Operations Committee
Cultural Arts Committee
Coastal San Pedro Neighborhood Council
aquarianstudios@hotmail.com
310-625-1157

DAY OF HEARING SUBMISSIONS

ARMBRUSTER GOLDSMITH & DELVAC LLP

LAND USE ENTITLEMENTS □ LITIGATION □ MUNICIPAL ADVOCACY

12100 WILSHIRE BOULEVARD, SUITE 1600
LOS ANGELES, CA 90025

DALE J. GOLDSMITH
DIRECT DIAL: 310-254-9054
E-MAIL: Dale@agd-landuse.com

Tel: (310) 209-8800
Fax: (310) 209-8801

WEB: www.AGD-LandUse.com

September 8, 2021

BY EMAIL

The Honorable City Planning Commission
of the City of Los Angeles
200 N. Spring Street, Room 272
Los Angeles, CA 90012

Attn: Cecilia Lamas, Commission Executive
Assistant
cpc@lacity.org

RE: 9500-9530 W. Pico/CPC-2020-5837-DB-CU-SPR-VHCA (Item 5.a on the
Commission's September 9, 2021 agenda)

Dear Commissioners:

We represent TRG 9500 W PICO, LLC, the applicant in the above manner. Our client is seeking various planning approvals for a 108-unit apartment project that would deed restrict 17 percent of the base density (13 units) as affordable to Very Low Income Households (the "Project").

At 5:00 p.m. tonight, less than 24 hours before the City Planning Commission meeting, we received a copy of a 233-page letter from the law firm of Lozeau Drury on behalf of Supporters Alliance For Environmental Responsibility ("SAFER"). While we have not had time to review the letter in detail, it alleges that the negative declaration prepared for the Project is inadequate.

The Commission has established submittal policies to prevent this type of unfair last minute "data dump" that has been increasingly criticized by California courts. The Commission's policies are clear:

Day of Hearing Submissions within 48 hours of the meeting, up to and including the day of the meeting are limited to 2 pages plus accompanying photographs and must be submitted electronically to *cpc@lacity.org*. Submissions that do not comply with these rules will be stamped **"File Copy. Non-Complying Submission."** Non-complying submissions will be placed into the official case file, but they will not be delivered to or considered by the Commission, and will not be included in the official administrative record for the item at issue.

ARMBRUSTER GOLDSMITH & DELVAC LLP

The Honorable City Planning Commission
of the City of Los Angeles
September 8, 2021
Page 2

The last minute letter from Lozeau Drury ***exceeds the Commission's established page limit for Day of Hearing Submissions by 231 pages*** and represents a brazen violation of the submittal policy. Therefore, we respectfully request that the letter be rejected as a non-complying submission in accordance with this policy.

Thank you.

Very truly yours,



Dale J. Goldsmith

cc: Department of City Planning
Attn: Heather Bleemers
More Song

· N · U · P · C · A ·
NORTH UNIVERSITY PARK COMMUNITY ASSOCIATION

April 1, 2021

Hearing Officer on behalf of the City Planning Commission
RE: CPC-2019-6289-GPA-ZC-HD
ENV-2019-6290-MND
640-700 W 27th Street

As a member of the NANDC Policy Committee and a member of the NANDC Board I was in attendance for the public hearings with the applicants for the above referenced project. During the Policy Committee meetings, I raised issues of concern regarding the appropriateness of the project and the associated zone change.

I am forwarding the following attachments for your consideration as part of the public hearing process:

- 6/26/20 Memo by email from Jim Childs to AAA Representatives (2 pages)
- Applicant response (pages 10, 11, 12, 14, 16, 18)
- Committee and community questions summary (3 pages)
- Historic Site Photo 1930s

Please add this information for the record. I plan on attending tomorrow's public hearing and provide this as background for the discussion. Please advise me of any further hearings on this matter.

Sincerely,

Jim Childs
NUPCA
c/o 2326 Scarff Street
LA, CA 90007
Jeanjim2341@att.net



NANDC
North Area Neighborhood Development Council
www.NANDC.org



Thryeris Mason
President

Julianne Burg
Vice President

Samantha Burg
Secretary

Julie Burg
Treasurer

Marco Flores
Area 1
Representative

Joel Vaca
Area 1
Representative

Steve Pepdjonovic
Area 2
Representative

Area 2 Vacant

Jean Frost
Area 3
Representative

Nicholas Creighton
Area 3
Representative

Jon Tieuel
At Large
Representative

Nina Womack
At Large
Representative

Cindy Gaete
At Large
Representative

Christopher Perez
USC Interest
Representative

Jim Childs
Business
Representative

August 31, 2020

Department of City Planning
200 N. Spring Street
LA, CA 90012
ATT: Sergio Ibarra (Sergio.Ibarra@lacity.org)

Via email

RE: 640-700 W. 27th Street, CPC-2019-6289-GPA-ZC-HD, proposed construction, use and maintenance of new 202,200 sq. ft. 4.5 story podium parking structure

Dear Mr. Ibarra:

The Empowerment Congress North Area Neighborhood Development Council (NANDC) Board discussed the parking structure proposal on August 6, 2020 at its General Board Meeting and at the Policy/Joint Board Committee meetings on July 28 and June 23. By motion, the Board supports the proposed parking structure provided that the approval includes a Qualified Condition (Q condition) as a part of the zone change in order to maintain the RD1.5 zoning restrictions on any future uses of the site. This will allow the current proposed parking structure to be constructed and yet preserve the integrity and compatibility of the RD1.5 zoning should there be future proposals for the sites. (The Board formally adopted this motion by vote of 11 ayes and 1 nay).

The approved motion provided a compromise to the zoning and land use concerns expressed by NANDC's Policy Committee and Board. Specifically, while the applicant has explained the reasons behind why a zone change to the C2 commercial zone is necessary to accommodate the proposed parking structure, the community was still concerned about potential future uses of the site. As such, the NANDC Board voted to support the project with the requested zone change to C2 on the condition that the final zoning of the project site provide that the use restrictions of the existing RD1.5 zone continue to be maintained.

NANDC also looks forward the continuing discussion in the MND process.

In extensive discussions with the developer and their consultant team, we were informed that the City would not permit a parking structure without a zone change (ZC) and general plan amendment (GPA.) A conditional use process was not an available option. The presentations illustrated the applicants' consideration of compatible design, setbacks, and materials; we are concerned about traffic and circulation and height.



NANDC is a self-governed, self-directed and independent organization empowered by the Los Angeles City Charter. This charter offers neighborhood councils a role in the City's decision-making process. NANDC was certified by the City of Los Angeles on April 27, 2002 and was the 24th neighborhood council formed under the guidelines of the City Charter. We promote public participation in city governance and decision making processes, to make government more responsive to our local needs and requests, creating more opportunities to build partnerships with government and private entities to create more opportunities for our neighborhood.

We look forward to a continuing relationship with the Automobile Club and their commitment to bringing jobs into the community. Their continuing presence in our neighborhood in the historic monument building at Adams and Figueroa since 1923 further influenced our decision making in support of this project.

Sincerely,

Thryeris Mason, President

Cc: Councilmember Curren Price, Jr.
Sherilyn Correa, CD9
Dwayne Gathers
NANDC Board



Oppose waiver for CPC-2019-4884-CU-DB-SPR

R Kambitz <mrbitz2000@hotmail.com>

Thu, Sep 9, 2021 at 8:38 AM

To: "cpc@lacity.org" <cpc@lacity.org>

As a member of the Marina Manor Homeowner's Association, we oppose the proposed waivers of Building Code for the planned 2111-2119 South Pacific Avenue, San Pedro as specified below:

1. The proposed increase in the density waiver to 46% will impact the surrounding community in a negative fashion, as our existing density is a factor already. With Pacific Avenue now restricted to one lane of traffic in either direction, due to a one lane imposed by the City Traffic Bureau.
2. The proposed waiver of parking spaces as mandated by code is unacceptable, the existing parking situation in the surrounding community is swamped at best. This can be substantiated by a review of Parking Enforcement records for "parking in private driveways, parking in red zones, and parking in front of fire hydrants.

To allow a waiver on either of the proposed will adversely impact the neighborhood in a negative factor.

Thank you,

Ron Bitz

Sent from [Mail](#) for Windows



COASTAL SAN PEDRO NEIGHBORHOOD COUNCIL

Doug Epperhart

President

Dean Pentcheff

Vice President

Kathleen Martin

Secretary

Louis Dominguez

Treasurer

October 23, 2020

Connie Chauv via Email: connie.chauv@lacity.org

Councilmember Joe Buscaino via Email: councilmember.buscaino@lacity.org

Re: Recommendation for continued strong opposition to 2111 Pacific

Dear City Representatives:

The following Resolution was passed by the Coastal San Pedro Neighborhood Council Board at a public Board meeting on October 19, 2020.

Whereas the Coastal San Pedro Neighborhood Council (CSPNC) passed a motion on November 18, 2019, which was sent to the Department of City Planning and the Council Office, recommending denial of the project for 2111 Pacific, as proposed, but offering support if:

- the project provides one parking space for each bedroom
- the project is limited to three stories not exceeding 30 feet
- the affordable housing for the project is increased to 24 units
- the project is LEED certified
- the project incorporates native plants into the landscape plan as per the San Pedro Urban Greening Plan
- the design for the project is changed to a building design that would be compatible with the surrounding neighborhood (as opposed to being similar to comparable projects downtown);

Whereas none of the conditions under which the CSPNC would offer support of the project have been addressed;

Whereas a City hearing notice has been issued for a new hearing of the project on October 28, 2020 that includes some modifications to the original project;

Whereas the applicant has added only 9 parking spaces, which is insufficient because the project is not on a major public transit line and does not qualify for Transit Oriented Communities (TOC) status due to insufficient public transportation;

Whereas the retail space has been reduced;

Whereas the applicant has added a request to waive the loading area requirement, which would cause further congestion on the street and hazards to pedestrians;

Whereas the applicant has added a requested entitlement/action, pursuant to LAMC Section 11.5.14.D.5, for a Redevelopment Plan Project Compliance to permit a residential mixed-use development in a Commercial Area in the Pacific Corridor Redevelopment Plan;

Whereas the applicant for 2111 Pacific has not provided the information requested by the Chair of the CSPNC Planning, Land Use and Transportation Committee regarding the differences in the project description and entitlement requests heard on March 12, 2020 vs. the project description and entitlement requests to be heard on October 28, 2020;

Whereas a Categorical Exemption from the California Environmental Quality Act (CEQA) must be denied because the project is not “consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations;”

Whereas a Categorical Exemption from CEQA must also be denied because the developer is “piecemealing” the cumulative impacts analyses: their two Pacific Corridor projects are being processed simultaneously, encompassing a whole action, and they must be reviewed as a package; and

Whereas a Categorical Exemption from CEQA must also be denied because due to San Pedro’s overwhelming and well-documented Port-related environmental hazards there are “unusual circumstances” creating the reasonable possibility of significant effects;

Therefore be it Resolved, that the Coastal San Pedro Neighborhood Council affirms its strong opposition to the project as revised and requests Council Office support of our opposition.

Please contact Robin Rudisill, Chair of the CSPNC Planning Committee, at 310-721-2343 should you have any questions related to this letter.

Sincerely,



Doug Epperhart, President
On behalf of the Coastal San Pedro Neighborhood Council Board

CC:

alison.becker@lacity.org
aksel.palacios@lacity.org
Vince.Bertoni@lacity.org
Lisa.Webber@lacity.org
Shannon.Ryan@lacity.org
Michelle.Singh@lacity.org
diananave@gmail.com
javier@studioarchitecture.net
rreg55@hotmail.com
carriescoville@yahoo.com



COASTAL SAN PEDRO NEIGHBORHOOD COUNCIL

Doug Epperhart
President

Dean Pentcheff
Vice President

Kathleen Martin
Secretary

Louis Dominguez
Treasurer

October 23, 2020

Connie Chauv via Email: connie.chauv@lacity.org

Councilmember Joe Buscaino via Email: councilmember.buscaino@lacity.org

Re: Recommendation for street widening for the 2111 Pacific project

Dear City Representatives:

The following Resolution was passed by the Coastal San Pedro Neighborhood Council Board at a public Board meeting on October 19, 2020.

Recommendation for street widening for the 2111 Pacific project.

Whereas the proposed project at 2111 Pacific is within the City's high injury network;

Whereas street widening would be required at the intersection of 22nd and Pacific in order to mitigate the substandard traffic conditions and the unsafe bus turning radius;

Whereas any street widening would impact the overall square footage of the project;

Whereas Pacific Avenue is the major tsunami evacuation route for this part of San Pedro.

Therefore be it Resolved, that the Coastal San Pedro Neighborhood Council asks that the Bureau of Engineering and the Department of Transportation require street widening at this location in the event the project is approved.

Please contact Robin Rudisill, Chair of the CSPNC Planning Committee, at 310-721-2343 should you have any questions related to this letter.

Sincerely,

Doug Epperhart, President

On behalf of the Coastal San Pedro Neighborhood Council Board

CC:

alison.becker@lacity.org
aksel.palacios@lacity.org
Vince.Bertoni@lacity.org
Lisa.Webber@lacity.org

Shannon.Ryan@lacity.org
Michelle.Singh@lacity.org
diananave@gmail.com
javier@studioarchitecture.net

rreg55@hotmail.com
carriescoville@yahoo.com



COASTAL SAN PEDRO NEIGHBORHOOD COUNCIL

Doug Epperhart

President

Dean Pentcheff

Vice President

Kathleen Martin

Secretary

Louis Dominguez

Treasurer

October 23, 2020

Connie Chauv via Email: connie.chauv@lacity.org

Councilmember Joe Buscaino via Email: councilmember.buscaino@lacity.org

**Re: Request for detail on Air Quality and Traffic Studies for 2111 Pacific
California Environmental Quality Act analysis**

Dear City Representatives:

The following Resolution was passed by the Coastal San Pedro Neighborhood Council Board at a public Board meeting on October 19, 2020.

**Request for detail on Air Quality and Traffic Studies for 2111 Pacific
California Environmental Quality Act analysis**

Whereas the applicant and the City have not provided the detailed information necessary in order to adequately perform the air quality and traffic studies for purposes of California Environmental Quality Act (CEQA) analysis, and the information on cubic yards of grading, required for environmental assessment, has actually been removed from the project description in the new hearing notice;

Therefore be it Resolved, that the Coastal San Pedro Neighborhood Council urges City Planning to require that the applicant provide the detailed information for grading, soil export and hauling routes and update the air quality and traffic studies for the required environmental assessment.

Please contact Robin Rudisill, Chair of the CSPNC Planning Committee, at 310-721-2343 should you have any questions related to this letter.

Sincerely,

Doug Epperhart, President

On behalf of the Coastal San Pedro Neighborhood Council Board

CC:

alison.becker@lacity.org

aksel.palacios@lacity.org

Vince.Bertoni@lacity.org

Lisa.Webber@lacity.org

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Channel Law Group, LLP

8383 Wilshire Blvd.
Suite 750
Beverly Hills, CA 90211

Phone: (310) 347-0050
Fax: (323) 723-3960
www.channellawgroup.com

JULIAN K. QUATTLEBAUM, III
JAMIE T. HALL *
CHARLES J. McLURKIN

Writer's Direct Line: (310) 982-1760
jamie.hall@channellawgroup.com

*ALSO Admitted in Texas

September 8, 2021

VIA ELECTRONIC MAIL

cpc@lacity.org
connie.chauv@lacity.org
cecilia.lamas@lacity.org

Members of the City Planning Commission
Ms. Connie Chauv, City Planner and,
Cecilia Lamas, Commission Executive Assistant
City of Los Angeles Department of City Planning
200 North Spring Street
Los Angeles, CA 90012

RE: 2111 - 2139 South Pacific Avenue, CPC-2019-4884-CU-DB-SPR-RDP, ENV-2019-4885-CE

Dear Members of the City Planning Commission, Ms. Chauv and Ms. Lamas:

This firm represents Citizens Protecting San Pedro ("Citizens"). I am writing to inform the City that the notice required by law has not been provided for the hearing scheduled for September 9, 2021 before the City Planning Commission. LAMC Section 12.24 D.3. requires a physical notice of the public hearing be posted at the site. This section of the Code states:

The Department **shall** give notice in **all** of the following manners: 3. **Site Posting.** By the applicant posting notice of the public hearing in a conspicuous place on the property involved at least ten days prior to the date of the public hearing. If a hearing examiner is designated to conduct the public hearing, then the applicant, in addition to posting notice of the public hearing, shall also post notice of the initial meeting of the decision-making body on the matter. This notice shall be posted in a conspicuous place on the property involved at least ten days prior to the date of the meeting. *The Director of Planning may adopt guidelines consistent with this section for the posting of notices if the Director determines that those guidelines are necessary and appropriate.*

Further, the Director of Planning has adopted guidelines consistent with LAMC Section 12.24 D.3. on form CP-3251 FINDINGS/SPECIALIZED REQUIREMENTS: HOUSING

INCENTIVES Density Bonus (DB) - Conditional Use (CU) - Public Benefit PUB). This project is requesting both DB and CU entitlements. Form CP-3251 states (near the bottom of page 1):

“Applications reviewed at Planning Commission level also require on-site posting of the Commission Meeting Agenda.”

The site posting required by LAMC Section 12.24 D.3. and the special guidelines of Form CP-3251 for applications reviewed by the Planning Commission has NOT occurred. Pictures are attached demonstrating this fact. These pictures were taken on Sunday, September 5, 2021.

Additionally, the public hearing notice requirements of LAMC Section 12.24 D.2. may not have been met. LAMC Section 12.24 D.2. requires that written notice be mailed no less than 24 days prior to the hearing to owners and occupants within 500 feet of the exterior boundaries of the property. This section of the Code states as follows:

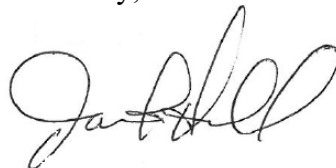
The Department **shall** give notice in **all** of the following manners: 2. **Written Notice.** (a) By mailing a written notice no less than 24 days prior to the date of the hearing to the applicant, the owner or owners of the property involved, and to the owners of all property within and outside of the City that is within 500 feet of the exterior boundaries of the property involved, using for the purpose of notification, the last known name and address of owners as shown on the records of the City Engineer or the records of the County Assessor... (b) By mailing a written notice no less than 24 days prior to the date of the hearing to residential, commercial and industrial occupants of all property within 500 feet of the exterior boundaries of the property involved. This requirement can be met by mailing the notice to **“occupant”**;

At least one resident, Rock Bilodeau, residing at 466 W. 22nd Street, within the 500 foot radius from the project, did not receive a hearing notice. Please immediately forward me the mailing list so that I can determine whether there have been other errors in providing notice to the community within 500 feet of the project as required by LAMC 12.24 D.2.

The City must provide the legal notice required by law. The hearing cannot move forward on Thursday September 9, 2021 as a result of these deficiencies.

I may be contacted at 310-982-1760 or at jamie.hall@channellawgroup.com if you have any questions, comments or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jamie T. Hall', written in a cursive style.

Jamie T. Hall

cc: Terry Kaufmann-Macias

Picture of Project Site Demonstrating Lack of CPC Agenda at Site Posting





Resident at 466 W. 22nd St. San Pedro, Within 500 Foot Radius, Did Not Receive Hearing Notice

ZIMAS

Search Reports Resources News!

466 W 22ND ST Font: A A +/- [Icons]

▼ Address/Legal

Site Address	466 W 22ND ST
ZIP Code	90731
PIN Number	012B201 730
Lot/Parcel Area (Calculated)	5,120.3 (sq ft)
Thomas Brothers Grid	PAGE 824 - GRID B7
Assessor Parcel No. (APN)	7456035016
Tract	NEVILLS TRACT
Map Reference	M B 5-70
Block	22
Lot	23
Arb (Lot Cut Reference)	None
Map Sheet	012B197
Map Sheet	012B201

► Jurisdictional

► Planning and Zoning

► Assessor

► Case Numbers

► Citywide/Code Amendment Cases

► Additional

► Seismic Hazards

► Economic Development Areas

► Housing

► Public Safety



Planning CPC <cpc@lacity.org>

Fw: Case CPC-2019-4884-CU-DB-SPR-RDP, 2111 - 2139 Pacific Ave Project

John Smith <jjscalifornia@yahoo.com>
To: "cpc@lacity.org" <cpc@lacity.org>

Wed, Sep 8, 2021 at 4:06 PM

John Smith

----- Forwarded Message -----

From: John Smith <jjscalifornia@yahoo.com>
To: connie.chauv@lacity.org <connie.chauv@lacity.org>
Sent: Wednesday, October 28, 2020, 11:33:41 AM PDT
Subject: Case CPC-2019-4884-CU-DB-SPR-RDP, 2111 - 2139 Pacific Ave Project

Please do not approve the apartment house at 2111 - 2139 South Pacific Avenue as currently designed. The parking is totally inadequate for this neighborhood, and the 4 story height is out of scale from the surrounding houses and buildings. The use and misuse of density bonus and low income provisions in state law is a cynical charade to push through a project that will benefit nobody but the developers, who have a strong financial incentive to build this monstrosity.

John Smith



COASTAL SAN PEDRO NEIGHBORHOOD COUNCIL

Doug Epperhart

President

Dean Pentcheff

Vice President

Kathleen Martin

Secretary

Louis Dominguez

Treasurer

November 27, 2019

Shannon.Ryan@lacity.org

Michelle.Singh@lacity.org

Subject: MOTION RECOMMENDING DENIAL OF PROJECT PROPOSED
FOR 2111 PACIFIC AVENUE, SAN PEDRO

Dear Representatives:

Please be advised that at a regular public meeting of the Coastal San Pedro Neighborhood Council Board held November 18, 2019, the Board approved and adopted the following Resolution:

BE IT RESOLVED:

The Coastal San Pedro Neighborhood Council recommends denial of the project proposed for 2111 Pacific Ave. as currently proposed but will offer support if the project provides one parking space for each bedroom, if the project is limited to three stories not exceeding 30 feet, if the affordable housing for the project is increased to 24 units, if the project is changed to be LEED certified, if the project incorporates native plants into the landscape plan as per the San Pedro Urban Greening Plan, and if the design for the project is changed to a building design that would be compatible with the surrounding neighborhood (as opposed to being similar to comparable projects downtown).

Please contact Robin Rudisill, Chair of the CSPNC Planning Committee, at 310-721-2343 should you have any questions related to this letter.

Sincerely,

Doug Epperhart, President

On behalf of the Coastal San Pedro Neighborhood Council Board

cc: Lisa.Webber@lacity.org; councilmember.buscaino@lacity.org

Mona Dallas Reddick & Robert H. Reddick
3712 Almeria Street
San Pedro, CA 90731

September 11, 2021

Department of City Planning
200 N. Spring Street, Room 720
Los Angeles, CA 90012

Re: Case No. CPC-2019-4884-CU-DB-SPR

Honorable City Planning Commissioners,

We would like to express our strong objection to the proposed project of 100 units at 2111–2139 S. Pacific Avenue in San Pedro, California, 90731, and to the “requested actions” sought by the developers of the property. To keep things short, we have outlined the main objections with bullet points.

- The density of the project, the 15.5-foot height increase, the increase of stories from two to four, and the dearth of parking spaces (only 75) all compromise the safety and quality of life of the surrounding residents.
- 22nd Street is a narrow street, serving as a key corridor that links the southern portion of San Pedro, as well as Palos Verdes, with Pacific Avenue, Harbor Boulevard, and the 110 Freeway. This is the wrong spot for a project with so little accommodation for the existing neighborhood and street capacity.
- To provide only 75 parking spaces for a 100-unit building with two quasi-retail spaces means that guests, customers, and the residents themselves will swamp the scarce neighborhood parking spots and make a difficult situation impossible for the existing residents. Moreover, the planned parking has many tandem spots and is unbundled with the dwelling units.
- Public transportation remains inadequate here, and the majority of people travel outside of the area for their jobs. It’s a fallacy to think that those who can afford to live in the new building will be giving up their cars any time soon.
- The requested increases of the floor area ratio, the height, and the stories will all create a project far out of scale with the surroundings. Light and air movement will be reduced for the nearby neighbors, while noise and reflected heat will increase.
- In addition to more parking spaces and a reduction in density, we urge the commission to demand more set-back, more stepped-up articulation of the several stories to eliminate the creation of a block-long fortress wall, and more housing for low-income residents.
- The worthy objective of providing more housing should not come at such a cost to an already densely packed and traffic-filled neighborhood. We urge the Department of City Planning to deny the requested actions of the developers, reduce the overall size of the project, and increase the number of required parking spaces per number of units.

Sincerely,

Mona Dallas Reddick & Robert H. Reddick



Item 8, September 9th hearing, 2111 Pacific, CPC-2019-4884-CU-DB-SPR

Robin Rudisill <wildrudi@mac.com>

Thu, Sep 9, 2021 at 9:00 AM

To: Planning Cpc <cpc@lacity.org>, Cecilia Lamas <cecilia.lamas@lacity.org>, Connie Chauv <connie.chauv@lacity.org>

COASTAL SAN PEDRO NEIGHBORHOOD COUNCIL

Recommendation for denial of project at 2111 Pacific Ave, San Pedro

Item 8, September 9, 2021 CPC hearing

CPC-2019-4884-CU-DB-SPR

Honorable Commissioners and Staff,

Below are my remarks on behalf of the Coastal San Pedro Neighborhood Council for today's hearing, Item 8, 2111 Pacific, San Pedro:

I am Coastal San Pedro Neighborhood Council Board Member and Chair of its Land Use, Planning & Transportation committee.

The Coastal San Pedro Neighborhood Council opposes the project as proposed. There is much community opposition. Planning Staff received approximately 50 letters or emails in opposition to the project, and one (1) email in support of the project.

This is a 100% OFF menu density bonus project, which is unacceptable and violates the intent and the letter of the law. The incentives requested don't meet ANY of the density bonus requirements in the ordinance. As the ordinance states, the off-menu section is only for requests for waiver or modification of any development standards not on the menu, and off menu is not for requests for incentives related to development standards that aren't able to meet the on menu requirements. It also needs to be noted that this project could not even qualify for the 2.65 to 1 FAR on the menu as it does not meet the required proximity to a Major Transit stop. And they want a FAR of 3.26 to 1! Skipping the on menu incentives because those requirements cannot be met and then requesting all of the incentives off menu, violates the density bonus ordinance.

Also, this project qualifies for 3 incentives and they are requesting 4 incentives—height, FAR, parking, and loading space. Waivers and modification of development standards are both off menu incentives. A waiver of a development standard is no different than an off-menu incentive. Approving 4 incentives is a violation of the density bonus ordinance.

This project requires a 52% height bonus vs. 35%, 4 stories instead of 2 stories, a FAR bonus of 117% vs. 35%, a 46% density bonus for 32 additional units, and a 34% decrease in parking vs. Option 1, which is approximately 2/3 the parking required by the density bonus ordinance.

Compare those extremely large bonuses to 11 very low income units provided, which is a paltry 11% of the total 100 units.

It's unacceptable and simply not to be believed that these levels of off menu bonuses are required for only 11 affordable units.

And to make matters worse, the finding that you shall approve the project unless you find that the incentives do not result in identifiable and actual cost reductions to provide for affordable housing costs, is impossible to make! Why? Because there's no evidence. Findings require evidence. You do not have access to the information in order to make that finding. Also, City Planning has no expertise in preparing or analyzing pro formas for construction projects and also they don't have access to anyone who is an expert. Even if they had the expertise or access to expertise, the unique data for the proposed project is not provided and there is not a way to verify the developer cost projections.

Neither does the public have access to this data and even if we did, since in this case it's all off-menu requests it's not appealable.

For these reasons, you, the decision maker, have no way to make the finding because you do not have the evidence available to do so. That is an infeasible, impossible finding and thus it cannot be made unless you get the evidence and run the numbers. In other words, you can't just say, well, we didn't do anything to check whether the bonuses were necessary to provide the affordable housing, so therefore we didn't find any problem, so therefore the project should be approved.

This project would set a precedent for violation of zoning regulations and non conformance with our Community Plans, and would result in a cumulative impact of probable future similar projects in the surrounding area that will serve to wipe out the existing widespread affordable housing in the area. That's an unacceptable result.

We implore you not to allow a project to become a precedent for San Pedro that violates the law, that undermines our San Pedro Community Plan and our Pacific Corridor Redevelopment Plan, and that contributes to a significant adverse cumulative impact. The incentive requests for this project must be scaled back to no more than three and to what is allowed on menu and in the parking options.

There are many violations of law here. Please continue this item and ask Planning to go back and make this project conform with the law.

Thank you,

Robin Rudisill
Coastal San Pedro Neighborhood Council



COASTAL SAN PEDRO NEIGHBORHOOD COUNCIL

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Vice President

Kathleen Martin

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February 24, 2020

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Councilmember Joe Buscaino

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Dear Representatives:

Please be advised that at a regular public meeting of the Coastal San Pedro Neighborhood Council Board held February 18, 2020, the Board approved and adopted the following Resolution:

Motion regarding proposed development at 2111 Pacific Ave.

Whereas the transit requirements for the parking requirement reduction allowed under AB 744 (a successor law to the State's Density Bonus Act) are not met, and as a result the applicant has materially changed the entitlement requests for the project, shifting the request for a 50% parking requirement reduction from a ministerial request under AB 744 to a discretionary request under the City's Density Bonus Ordinance for off-menu items,

Whereas the City's initial Public hearing did not provide members of the Public reasonable notice of this material discretionary entitlement request and a reasonable opportunity to be heard thereon,

Whereas under the 5th and 14th amendments to the U.S. Constitution and Article 1, Section 7 of the State Constitution, stakeholders have due process rights when local agencies hold hearings for the purpose of making land use decisions,

Whereas under the California Environmental Quality Act (CEQA) a project description is supposed to be fairly complete, accurate and consistent.

Therefore the Coastal San Pedro Neighborhood Council demands that the City conduct a local re-hearing of the project so that the Public can provide testimony related to this significant new discretionary request.

Please contact Robin Rudisill, Chair of the CSPNC Planning Committee, at 310-721-2343 should you have any questions related to this letter.

Sincerely,

Doug Epperhart, President

On behalf of the Coastal San Pedro Neighborhood Council Board