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

SECONDARY SUBMISSIONS

1724 West Adams Boulevard Project
CPC-2023-397-DB-SPR-HCA, ENV-2023-398-CE
Comments & Responses

The following are responses to comments received during the public noticing period on the Project's Class 32 CE. Complete copies of all comments received are provided in Appendix A of this document.

Southwest Mountain States Regional Council of Carpenters (Letter dated June 2, 2023 from Mitchel M. Tsai, Attorney at Law)

Comment 1: **The City should require use of a local workforce to benefit the community's economic development and environment. ...Community benefits such as local hire can also be helpful to reduce environmental impacts and improve the positive economic impact of the Project. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project site can reduce the length of vendor trips, reduce greenhouse gas emissions, and provide localized economic benefits. ...The City should consider utilizing local workforce policies and requirements to benefit the local area economically and to mitigate greenhouse gas, improve air quality, and reduce transportation impacts.**

Response 1: The comment argues that local workforce requirements are needed to mitigate air quality, GHG and traffic impacts. As discussed in the Project's Class 32 CE, the Project would not result in any significant air quality or transportation impacts. In addition, as an infill development in compliance with the General Plan and zoning, the Project is consistent with the state's GHG plans. The Project is an infill development located along the densely developed West Adams Boulevard, placing housing uses in proximity to regional and local transit stops. The Project places housing near commercial uses to allow for alternate forms of transportation (e.g., cycling, walking, transit, etc.) to and from work affecting overall reductions in vehicle miles traveled (VMT) and associated pollutant emissions.

The comment references and attaches as "Exhibit A" a generalized study by SWAPE (dated March 8, 2021) of the impact of local hiring requirements on greenhouse gas (GHG) modeling. This generalized study does not affect the Class 32 CE conclusions, as the Project does not have any unmitigated air quality impacts. The CE includes an Air Quality Technical Report prepared by Meridian Consultants (dated February 2023). The Air Quality Technical Report quantifies the estimated daily construction and operational emissions for various pollutants from the project site using CalEEMod simulations. Based on the simulation results, none of the construction and operational emissions are expected to exceed the South Coast Air Quality Management District (SCAQMD) air quality significance thresholds. Furthermore, the report finds that the project is consistent with all applicable aspects of the City's General Plan Air Quality Element. The Project assumptions for construction worker trip length and vehicle miles traveled ("VMT") are consistent with CalEEMod 2022 defaults, which estimate a trip length of 18.5 miles per construction worker trip. Using these default assumptions,

the Project would not result in any significant impacts as explained in the Class 32 CE.

Even though the Project would have a less than significant impact on air quality assuming a trip length of 18.5 miles, an updated report (the “Updated Report,” attached as Exhibit A) using a trip length of 9 miles was prepared for the Project. As shown in the below table, the Updated Report demonstrates that modifying the assumptions for trip lengths of 9 miles (which is less than the 10 mile trip length mentioned in the comment) would not change the level of significance and air quality impacts would remain less than significant.

TABLE 9 MAXIMUM CONSTRUCTION EMISSIONS						
Source	VOC	NOx	CO	SOx	PM10	PM2.5
	pounds/day					
2023	1.4	17.1	13.4	<0.1	2.9	1.5
2024	13.1	7.2	12.0	<0.1	1.0	0.4
2025	0.8	5.8	9.6	<0.1	0.8	0.3
Maximum	13.1	17.1	13.4	<0.1	2.9	1.5
Maximum (February 2023 Report)	11.4	17.1	15.0	<0.1	3.1	1.9
SCAQMD Mass Daily Threshold	75	100	550	150	150	55
Threshold exceeded?	No	No	No	No	No	No

Notes: CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; SOx = sulfur oxides; VOC = volatile organic compounds.

Comment 2: **The City should impose training requirements for the Project’s construction activities to prevent community spread of Covid-19 and other infectious diseases. . . . The City should require that all construction workers undergo COVID-19 Training and Certification before being allowed to conduct construction activities at the Project Site.**

Response 2: The comment claims that Covid-19 and other infection disease risks necessitate training protocols for the Project. Public health risks such as COVID are well outside the scope of CEQA. In addition, the local, state, and federal governments have removed emergency orders related to Covid-19. Any public health concerns created by the Covid 19 pandemic are not Project impacts. Under CEQA, impacts must be related to a physical change in the environment and must be caused by the proposed project. Finally, Project construction will be subject to, and will follow, all applicable state and local public health regulations and protocols at the time of construction.

The comment does not state a specific concern or question regarding the adequacy of the CE in identifying and analyzing the environmental impacts of the Project, nor does the comment identify any physical environmental impacts caused by the Project. Therefore, this comment does not require a detailed response.

Comment 3: **The Project does not qualify for a Class 32 categorical exemption. As detailed below, the DEIR is legally inadequate and must be substantially revised and recirculated for public review and comment.**

- Response 3:** The comment makes generalized claims and ignores the detailed, Project-specific analysis in the CE and the supporting technical reports regarding traffic, air quality, and noise, including Air Quality Technical Report prepared by Meridian Consultants (dated February 2023), Noise Study for the 1724 W. Adams Project prepared by Meridian Consultants (dated February 2023), and Transportation Assessment for 1722-1734 W. Adams prepared by Overland Traffic Consultants, Inc. (dated March 2023). In fact, the CE contains substantial evidence to support the applicability of the exemption.
- Comment 4:** **The Project is not consistent with the general plan and applicable zoning designation and regulation... Specifically, the Project’s zoning is: C2-1VL-O-CPIO, i.e., it is proposed on a parcel zoned commercial, with lower height and it is subject to community plan implementation overlay additional requirements. Moreover, it is located just across from residentially zoned properties... in the South Los Angeles Community Plan area, with the Neighborhood Commercial designation. Under the General Plan’s Framework Element, the Neighborhood Commercial designation of the Project site provides: “GOAL 3D: Pedestrian-oriented districts that provide local identity, commercial activity, and support Los Angeles’ neighborhoods.” ...Similarly, according to the applicable South Los Angeles Community Plan as it pertains to land use and urban design, one of the Plan’s Community Themes is to preserve neighborhood character, stating that “[p]rojects should contribute to reinforcing the distinctive and historical character of the corridors and the residential neighborhoods they serve.” ...Specifically... the Community Plan provides several goals and policies to preserve commercial land, including: LU13.2 Limit Incompatible Uses. Maintain the neighborhood feel of these Neighborhood Commercial areas by limiting uses that impact the built environment, reduce walkability and contain incompatible operations that spill over into the residential neighborhoods (e.g. autorelated uses).”**
- Response 4:** The comment alleges that the Project is inconsistent with the General Plan, citing several policies applicable to the Project Site. As demonstrated in detail in the CE at pages 4 through 6, the Project is consistent with all applicable policies, goals and objectives of the General Plan and applicable zoning designations and regulations. The Project is not requesting a zone change or General Plan amendment. The Project Site’s C2 zone and Neighborhood Commercial land use designation allow both commercial and residential uses. The Project is not in conflict with the comment’s cited policies to protect the character of the area.
- Comment 5:** **Notably, per the City’s ZIMAS report, the Housing Element of the General Plan allocates only 0.08 units for lower income for this site. In other words, the site was not identified as one to produce residential housing, especially 90 units as it proposes**
- Response 5:** The City’s Housing Element states an overarching goal (GOAL 1) to create: “A City where housing production results in an ample supply of housing to create more equitable and affordable options that meet existing and projected needs.” The development of 90 units of housing including 10 units reserved for Very Low Income Households at this location clearly meets the Housing Element goals.

According to ZIMAS and pursuant to SB 166, the no net loss law, the site must accommodate a minimum of .8 lower income units in furtherance of the City's efforts to meet its Regional Housing Needs Allocation. The comment misconstrues the allocation as cap, rather than a minimum. The Housing Element does not establish a maximum number of units at the Site.

Comment 6:

Furthermore, Goal LU4 of the Community Plan calls for “[d]istinct multi-family neighborhoods that preserve physical assets and foster neighborhood character and identity,” while policy LU4.1 is to “[s]eek a high degree of architectural compatibility and landscaping for new infill development to protect the historical and architectural character and scale of existing residential neighborhoods, including front yard fence location, design, and materials.” However, per the Project Plans filed by the Project Applicant, the building proposed for the Project ... has a modern appearance distinct and very different from other buildings close to the Project Site that have a more historical appearance.... Therefore, the Project’s proposed physical character does not reinforce the distinctive and historical character of the residential neighborhood that it serves and thus renders the Project inconsistent with the South Los Angeles Community Plan. Also distinct is the mass and scale, the higher floor area ratio and height of the proposed 5-story 59-foot building as compared with the maximum 2-story commercial and residential smaller buildings nearby. Therefore, the Project is inconsistent with the goals and policies of the General Plan and the South Los Angeles Community Plan for the commercially zoned areas, as it fails to preserve the commercial land and/or the character of the neighborhood and instead proposes a residential building, i.e., with much higher intensity and density.

Response 6:

The scale and massing of the Project is designed to fit within the surrounding urban context. The Project consists of residential uses and operations that are compatible with the surrounding urban development and consistent with the underlying zoning and planning. The mass and scale of the Project meets all applicable design guidelines and standards and has an appropriate, context-sensitive scale. The Project adheres to the Citywide Design Guidelines and is also compliant with the South Los Angeles CPIO design standards for Subarea A. These standards ensure the Project is responsive to the surrounding context, and provides sufficient glazing and pedestrian oriented features to integrate the Project within the surrounding neighborhood. The building is appropriately located 25 feet from the R2 zone across the alley, in compliance with the CPIO transitional height requirements. The proposed building’s mixture of height, material and color will create articulation and visual interest that is appropriately scaled to the surrounding commercial and residential neighborhoods with a plaza focal point at the ground level. See also Response 4 above regarding general plan consistency.

Comment 7:

Per ZIMAS, the Project is located in the methane zone, which carries its own requirements and zoning regulations. ...Given that the Project is located in the Methane Zone, it is subject to fire hazards. And yet, the City is silent on this critical issue.... As such, the Project fails to meet the first requirement under the Class 32 exemption to establish it is consistent with the applicable General Plan and all applicable zoning and regulations.

Response 7: The CE properly identifies the Project site as within a Methane Zone (CE, p. 12), stating that, “although the project site is located in a Methane Zone, the project will comply with any applicable developmental regulations.”

LAMC Chapter IX, Article 1, Division 71, Section 91.7103, also known as the Los Angeles Methane Seepage Regulations, establishes requirements for buildings and paved areas located in methane zones and methane buffer zones. Requirements for new construction within such zones include methane gas sampling and, depending on the detected concentrations of methane and gas pressure at the site, application of design remedies for reducing potential methane impacts. The required methane mitigation systems are based on the site Design Level, with more involved mitigation systems required at the higher Site Design Levels. The required methane mitigation systems are designed so that when properly implemented, they reduce methane-related risks to a less than significant level.

Methane is a naturally occurring gas associated with the decomposition of organic materials. Excavation and construction activities within the Project site that involve work in confined spaces on-site could pose a potential for methane build-up. Adherence to industry-standard construction safety measures, as well as compliance with California Occupational Safety and Health Act safety requirements, would reduce the risk in the event that elevated levels of these soil gases are encountered during grading and construction. The Project would comply with the City’s requirements for being located on a site classified to be Design Level II. Based on this design level, the Project does not require an active methane system but is required to implement a passive system with perforated horizontal pipes, a gravel blanket under an impervious membrane, vent risers, trench dams and conduit seal fittings. With compliance with these existing regulations, impacts associated with methane gas would be less than significant.

Comment 8: **The Project May Have Significant Environmental Effects.... In addition to being inconsistent with the General Plan and zoning regulations, the Project is also not eligible for the Class 32 CEQA exemption because it may have significant environmental effects, including but not limited to traffic, air, greenhouse gas emissions, noise, and water. CEQA Guidelines § 15332(d). CEQA exemptions are reserved for projects without potential to have significant environmental effects.**

Response 8: See Response 1 (air quality) above and Responses 9 (noise) and 11 (traffic) below. The comment contains no evidence to support its assertion that the Project may have significant environmental effects.

Comment 9: **The Project May Cause Significant Noise Impacts.... The Project may cause a substantial noise impact to sensitive receptors, including during the Project’s demolition, construction and operation phases, as compared with the current baseline of an existing commercial building. Yet, the Project’s Findings Document filed with the City merely relies on the Project’s compliance with the City of Los Angeles Noise Ordinance to suggest that the Project’s approval would not result in any significant effect relating to noise.**

- Response 9:** The CE conclusions are based on the Noise Study for the 1724 W. Adams Project prepared by Meridian Consultants (dated February 2023). Contrary to the assertion in the comment, the Noise Study does not rely on the Project's compliance with the noise ordinance to address noise impacts. The Noise Study identifies sensitive receptors (residential uses) to the north and south of the Project Site and measured ambient noise levels at seven (7) monitoring sites. The Noise Study further modeled potential construction noise levels against a significance threshold of 5 dBA above ambient noise levels, finding four locations where the potential noise would exceed the threshold. (See Noise Study, Table 3.) The Noise Study addressed regulatory compliance practices required to reduce construction noise and concluded that, with implementation of standard regulatory compliance practices, "construction noise levels resulting in a maximum increase of 20.1 dBA (Leq-1hour) above the significance threshold of 5 dBA over ambient noise levels would be reduced by a minimum of 26.5 dBA (Leq-1hour) when utilizing a combination of optimal muffler systems, dampening materials, sound aprons and limiting simultaneous operations." (Noise Study, p. 22.) Therefore, construction noise levels would not be considered significant.
- Comment 10:** **In addition, the Project's reliance on regulatory compliance with noise ordinances is misplaced because there is no evidence such ordinances were to control noise outside of the building's envelope, such as e.g., traffic noise or increase in ambient noises due to the Project's construction and operation. ... Accordingly, the Project may have a significant noise impact and, as such, the Project's potential noise impacts should be thoroughly analyzed and evaluated in an Environmental Impact Report pursuant to CEQA.**
- Response 10:** See Response 9 above regarding noise impacts.
- Comment 11:** **The Project May Cause Significant Traffic Impacts ...The very nature of the proposed apartment building in a commercial zone, next to other low-density residential zoning and buildings, indicates that the Project may cause significant traffic impacts. Given that the Project proposes to provide ninety (90) new residential apartment units, this suggests that the Project will result in a significant increase in new net daily trips to and from the residents' workplaces, as compared with the present one-story commercial building. Moreover, the Project does not contain mixed-use, which could have otherwise allowed residents to live and work in the same place and thereby reduce traffic. Coupled with the fact that demolition and construction of the Project itself may result in road closures and detours, the Project may have significant traffic impacts which should be addressed in an EIR pursuant to CEQA Guidelines section 15064.3.**
- Response 11:** The CE concludes that the Project will not result in any significant transportation impacts, based on the conclusions of the Transportation Assessment for 1722-1734 W. Adams prepared by Overland Traffic Consultants, Inc. (dated March 2023). This Assessment contains substantial evidence (including a thorough analysis of the Project under the City's TAG Guidelines, a calculation of VMT with the City's VMT calculator, and a review of potential geometric hazards) to support its conclusion that the Project does not create a significant transportation impact. The comment contains no evidence to support its assertion that "the very nature of the proposed apartment building" will cause substantial traffic impacts.

- Comment 12:** **The Project May Cause Significant Air Quality, Greenhouse Gas Emission, Water, Noise, Human Health, and Wildlife Impacts ...**Since the Project may have traffic impacts, as discussed above, the Project may derivatively also have air quality, greenhouse gas emission, noise, and other trafficrelated impacts, during both the construction and operation phase. In addition, the Project may have such related cumulative impacts, along with other related projects, as discussed below. Therefore, the Project does not qualify for a CEQA exemption since it may cause more air, GHG, energy, water, noise and other impacts, both related and unrelated to traffic, including impacts on human beings and natural environment.
- Response 12:** The comment provides no evidence whatsoever that the Project may have air, GHG, energy, water, noise or other impacts. As discussed above in Response 11, the CE finds no significant traffic impacts, based on substantial evidence in the record. See Response 18 below regarding cumulative impacts.
- Comment 13:** **The Project May Have a Significant Hazards Impact....** As noted above, according to the Project’s ZIMAS Report, the Project Site is located within the methane zone, with its own health and safety risks to both the Project occupants and the surrounding environment. The Project Applicant’s Findings Document is silent on this methane issue and its fire and health hazards. Yet, methane hazards have been acknowledged by the City of Los Angeles, including in Division 71, Sec. 91.7101 through 91.7109, as well as CA Building Code, both of which require specific remedial/mitigation measures. These fire and health impact written findings disqualify the Project from obtaining the incentives it seeks, since the Project may exacerbate those hazards for the environment by placing a much more dense and intensive land use near sensitive receptors.
- Response 13:** See Response 7 above regarding methane.
- Comment 14:** **Additionally, the Project may also cause a significant hazard impact due to the demolition hazards, including impacts to human beings and sensitive receptors, air, and water quality, along with the Project’s location within the methane zone. Thus, under CEQA Guidelines section 15065(a)(1)(4), the City shall make mandatory findings of significance and order that an EIR be prepared to thoroughly assess the potential impact of the Project and its required demolition.**
- Response 14:** The comment provides no evidence that the demolition of the existing one-story commercial building will result in any hazards.
- Comment 15:** **The Project Will Have Significant Impacts Due to Unusual Circumstances...** It is undisputed that the Project has unusual circumstances in view of the Project’s demolition of a 8,500-square-foot building, along with the potential hazard impacts associated with the handling and disposal of the demolition debris, as discussed above.
- Response 15:** The comment claims, without any evidence whatsoever, that the Project has “unusual circumstances” that would preclude use of the Class 32 exemption. The

comment claims that constructing a new multi-story, residential building to replace one-story retail stores in a highly urbanized area represents an unusual circumstance.

As stated on p. 4 of the CE, the Project Site is a level parcel currently developed with a single story commercial building and located in an area that is currently fully developed with a variety of commercial, multi-family residential, and institutional uses, ranging in height from one to three stories. There are no unusual circumstances related to the development of the Project's uses at this urbanized location. The CE properly concludes no such unusual circumstances exist for the Project, a conclusion supported by substantial evidence in the record. (See CE, at p. 12.)

The comment fails to meet its burden to show that the "unusual circumstances exception" to the Class 32 CE adopted for the Project applies. The comment's speculation concerning "hazard impacts associated with the handling and disposal of demolition debris" does not constitute substantial evidence.

Comment 16: Even further, according to ZIMAS, the Project is located within the Methane Zone, with its own potential for significant impacts, including on emergency/evacuation patterns and public services. As such, the Project may significantly exacerbate the conditions on and around the Project site and cause impacts thereby.

Response 16: See Response 7 above regarding methane.

Comment 17: The Project is also unusual in its mass and scale as it is proposed on a commerciallyzoned parcel and in close proximity to other residential structures and dramatically intensifies the land use of the Project site, as compared with what the zoning allows and what is the present baseline. It is reasonably foreseeable that the noted unusual circumstances may cause significant impacts on the environment. Accordingly, the Project may have a significant effect on the environment due to such unusual circumstances and therefore a Class 32 categorical exemption is improper.

Response 17: See Response 6 above concerning mass and scale. The Project consists of residential uses that are compatible with the surrounding urban development and consistent with the underlying zoning and planning. There are no unusual circumstances, and the comment does not meet its burden of demonstrating an unusual circumstance.

Comment 18: The Project Will Have Cumulative Impacts with Other Related Projects...The Project should not qualify for a Class 32 exemption because it may have cumulative impacts with other related projects. ... Pursuant to an UrbanizeLA Article of January 2023, there is at least one (1) other related project nearby...The comment attaches a January 26, 2023 Real Deal article entitled "High-density West Adams to get more apartments.".... Given the fact that the Metro rail line will go through South L.A., as noted in the article, it will also reasonably foreseeably attract many more related buildings and denser development in the South L.A. area. The Project's cumulative impacts with the mentioned and other related past,

present, and reasonably foreseeable projects further disqualify it from a Class 32 exemption.

Response 18:

The comment alleges, without any evidence whatsoever, that the cumulative impacts of the Project make it ineligible for a Class 32 exemption. In fact, the CE appropriately considers cumulative impacts, based on a list of Related Projects found in the Transportation Assessment. The Related Projects are known projects within 0.5 miles of the Site in compliance with the City's Transportation Assessment Guidelines. There are no Related Projects on the same block or across the street from the Project and none within 500 feet of the Project Site. The two closest related projects are a 10 unit apartment at 1602 Adams Blvd. and 96 co-living units at 1840 Adams, each approximately 1,000 feet from the Project Site. (Transportation Assessment, pp. 16-17.)

The CE analyzed the cumulative impacts of the Project combined with applicable Related Projects. For example, the Noise Study considered the cumulative noise impacts of the Project along with the Related Projects, concluding that combined construction noise impacts of related projects within 500 feet would not cause a significant cumulative impact. (Noise Study, p. 24.) The CE technical reports also analyze the cumulative impacts related to transportation (Transportation Assessment p. 18) and air quality (Air Quality Report, p. 19) concluding that there would be no traffic or air quality cumulative impacts.

The comment does not provide any substantial evidence that there would be cumulative impacts, and the comments reliance on news articles about future development in the area is speculative, generalized and does not constitute evidence.

Comment 19:

In addition, the Applicant has reportedly filed numerous other development applications in the past years, which – in addition to high density developments in the South Los Angeles area, with the highest density in the LA area and primarily Black and Latino population– has sparked an Environmental Justice issue and a gentrification debate.

Response 19:

The comment does not state a specific concern or question regarding the adequacy of the CE in identifying and analyzing the environmental impacts of the Project, nor does the comment identify any physical environmental impacts caused by the Project. Therefore, this comment does not require a detailed response.

Comment 20:

Lastly, and on a separate note, the proposed Project, with its dense residential development in a low-intensity or density neighborhood and on a site of a now-vacant service station, along with the existing dense population in South L.A. and West Adams area, raises an issue of disproportionate development in the City and Environmental Justice issues for the disadvantaged and primarily Black and Latino population. This, in turn, suggests that the Project is inconsistent with the respective Environmental Justice principles and provisions under the California planning and zoning law and the City's General Plan environmental justice principles, including the Plan for a Healthy Los Angeles Element of the General Plan.

Response 20:

The comment does not state a specific concern or question regarding the adequacy of the CE in identifying and analyzing the environmental impacts of the Project, nor does the comment identify any physical environmental impacts caused by the Project. Therefore, this comment does not require a detailed response.



August 4, 2023

Esther Ahn, City Planner

esther.ahn@lacity.org

(213) 978-1486

Dear City Planning Commission,

We are writing to you regarding the proposed 74 unit development, including 11 affordable units, at 12124 Pacific Ave, cases CPC-2022-8256-CU-DBPHP-HCA/ENV-2022-8257-CE. We urge the commission to approve the project with the Density Bonus and incentives.

The greater Los Angeles region is facing a severe housing shortage, particularly affordable housing. Creating new housing in this neighborhood, in a high opportunity area, will help to reduce issues of gentrification and displacement. Abundant Housing LA believes that these housing challenges can only be addressed if everyone in the region does their part.

This project is close to schools and recreation centers as well as grocery stores and restaurants. It is great to see the developer using incentives 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 project with the Density Bonus and incentives.

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

Dan Stein
3709 McLaughlin Ave.
Los Angeles, Ca. 90066

August 7, 2023

Ms. Esther Ahn
Department of City Planning, Expedited Processing Section
City of Los Angeles
200 N. Spring Street, Room 763
Los Angeles, CA 90012

Subject: 12124 W. Pacific Avenue
Letter of Support

Dear Ms. Ahn,

I'm a property owner in the Mar Vista Community Council area. This letter is to advise of my support for the proposed development at 12124 W. Pacific Avenue. The new housing, including both market rate and affordable units, will improve the neighborhood. The location just off Venice Boulevard is excellent and has connections to transit, businesses, and many community amenities in the surrounding area. The new units will provide wonderful new housing and help address the city's need for housing. Additionally, 11 of the units will be reserved for very low-income households for 55 years to help meet the housing needs for all segments of the population. The well-designed project will enhance Pacific Avenue and significantly improve the site and benefit the community of Mar Vista.

We are looking forward to this project being built and request that you approve it.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Dan Stein', written over a horizontal line.

Dan Stein



Planning CPC <cpc@lacity.org>

Fwd: 12124 Pacific item No. 6

maria tortu <mtortu@icloud.com>
To: cpc@lacity.org

Mon, Aug 7, 2023 at 2:50 PM

Begin forwarded message:

From: Esther Ahn <esther.ahn@lacity.org>
Subject: Re: 12124 Pacific
Date: August 7, 2023 at 21:51:01 GMT+1
To: maria tortu <mtortu@icloud.com>

Good afternoon,

Thank you for your comments. They have been received, but in order to ensure these comments are viewed by the City Planning Commission, please also forward your message to them directly at cpc@lacity.org while referencing Item No. 6 for this project.

Many thanks,
Esther

On Mon, Aug 7, 2023 at 12:28 PM maria tortu <mtortu@icloud.com> wrote:

Dear Ms.Ahn:

The proposed project at 12124 Pacific is out of scale for the neighborhood and is placing further burden on an already overburdened block abutting a single family residential area. While the requested on-menu incentives may fall within the city planning parameters they should not receive blanket approval without careful consideration of all of the particulars of the area where the proposed project is located. Increasing height by more than 20 feet and decreasing setbacks by 20 percent makes the project out of scale with the surrounding community. It is not on a main thoroughfare or even a corner lot and will put increased pressure on traffic circulation and street parking on a block that already has a fire department, post office, lumber yard, small businesses, restaurants, schools, churches and a weekly farmers' market.

I understand the city's plan is for reducing or eliminating private cars but the necessary public transportation infrastructure is not in place and will not be anytime in the foreseeable future. Until then cars are inevitable. Offering insufficient parking spaces for the number of building occupants and charging a premium for them is not a viable solution. In addition building for the future needs to address more than just vehicles. Nothing should be permitted that isn't constructed with sustainable non toxic materials, net zero or net positive renewable energy, water conservation and recapture, green space, etc... Simply limiting the number of parking spaces and increasing density using standard construction methods does not address these larger issues. It only compounds existing problems.

Another issue that should be taken into consideration is the street level appearance of the building. Many of the buildings that recently have gone up are incredibly unsightly at ground level with industrial garage entrances large standpipes and meters on display, etc. none of which are included in the proposal sketches. As this proposal includes ground floor and subterranean parking i expect it will have a similar unappealing ground level appearance exacerbated by reduced setbacks. Additionally they all seem to add over height limit rooftop boxes for elevator shafts, hvac units and roof gardens. The height limit should be enforced across the entire building.

And of course there's the general incongruous and unpleasant appearance of such a large structure in a low rise neighborhood. The size of which will have great impact on the surrounding community in terms of shading, literally blocking out the sun for those unfortunate enough to have homes near it. While at the same time increasing light pollution at night for the entire neighborhood.

Also to be considered is the proposed project is replacing a church and not a residence. The lot with the

existing set backs and 45' height limitation already represents an increase of 44 units. There is no reason to allow waivers and grant additional density bonuses before a property has met it's existing limits.

Please reject these waivers and approve a proposal that conforms to existing limits.

Thank you;

Maria Tortu

[3927 Keeshen Drive](#)
Mar Vista, CA 90066



Esther Ahn

City Planner

Los Angeles City Planning

[200 N. Spring St., Room 763](#)

[Los Angeles, CA 90012](#)

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August 8, 2023

Ms. Esther Ahn
Department of City Planning, Expedited Processing Section
City of Los Angeles
200 N. Spring Street, Room 763
Los Angeles, CA 90012

Subject: 12124 W. Pacific Avenue
Letter of Support

Dear Ms. Ahn,

This letter is to advise of my support for the proposed development at 12124 W. Pacific Avenue.

It's location just off Venice Boulevard is excellent and has connections to transit, businesses, restaurants and many community amenities in the surrounding area.

The new housing, including both market rate and affordable units, will improve the neighborhood.

As a new homeowner myself, and living in the area I am pleased that the new units will provide housing and help address the city's need for housing. Additionally, 11 of the units will be reserved for very low-income households for 55 years to help meet the housing needs for all segments of the population.

The well-designed project will enhance Pacific Avenue and significantly improve the site and benefit the community.

We are looking forward to this project being built and request that you approve it.

Sincerely,





Planning CPC <cpc@lacity.org>

Item #6 : 12124 Pacific Ave

Steven Porch <s.porch@me.com>
To: cpc@lacity.org

Mon, Aug 7, 2023 at 2:51 PM

To Los Angeles City Planning Commission -

Re. Item # 6 :

Regarding the proposed development at 12124 Pacific Avenue, I am writing to protest the requested waivers as being inappropriate and unsuitable for the locale, namely :

2a,b : Allowing 20% reduction in standard setbacks will reduce much-needed space between structures, especially as the proposed height increase of the structure would already cut down on light and space in an existing dense environment.

2c : Allowing a 35% increase in FAR will add density pressure to an area where the proposed structure, pre-waiver, is already out-of-character within a mainly one and two storey residential community of single family homes.

2d : Allowing an increase in building height to 67 feet (from 45 feet) is unacceptable in an area where the tallest existing buildings are a maximum of 45 feet.

These waivers would aggravate issues with reduced space and light, street parking pressure and traffic density, as well as causing additional noise and light pollution.

They would also effectively change the character and ambience of an existing low-rise neighborhood, whilst at the same time do nothing to solve the real problems of the city such as lack of affordable housing, traffic density and pollution.

I strongly advocate that these unnecessary, inappropriate waivers be denied for the good of the community.

Sincerely,

Steven Porch
3927 Keeshen Drive
Los Angeles, CA 90066

DAY OF HEARING SUBMISSIONS



Planning CPC <cpc@lacity.org>

Case #: CPC-2022-8256-CU-DB-PHP-HCA, Item # 6

Brett Hollenbeck <brett.hollenbeck@gmail.com>
To: cpc@lacity.org

Wed, Aug 9, 2023 at 4:25 PM

Please record my statement for the public record: I am strongly in support of the proposed development at 12124 Pacific. This is Item No. 6 of the agenda. Please approve this project with no further delays or changes.

Speaking as a homeowner in this neighborhood, I know very well how the housing crisis is hurting our once beautiful city. Young families can no longer afford to live in West LA. Homelessness caused by lack of housing is out of control. Economic growth is stifled as residents are priced out and move to Texas for better opportunities. The proposed housing development is exactly what we need more of, as it is a large-scale multi-family unit right on a major corridor that nevertheless fits well and preserves the neighborhood character.

Thank you,
Brett Hollenbeck
4431 Purdue Ave

August 8, 2023

Attn Commission Office

RE: Item No. 6 on Agenda – August, 10 2023 Meeting

Subject: 12124 W. Pacific Avenue
Mar Vista CA 90066.

Re: *Letter of Support*

This letter is in support of the proposed development at **12124 W. Pacific Avenue, Mar Vista CA 90066.**

I believe the location is excellent especially that it is close transit, restaurants, businesses, farmers market and many community amenities in the surrounding area.

We have a shortage of housing and the project will have affordable units (I believe 11 of the units will be reserved for very low-income households for 55 years to help meet the housing needs for all segments of the population) and market rate units and the area will benefit from the project. Mar Vista and the city is in need for housing.

The building will greatly enhance Pacific Avenue and significantly improve the site and benefit the community.

I hope that the project gets approve.

Sincerely,


Errol Spiro

August 8, 2023

Ms. Esther Ahn

Dept. of City Planning, City of Los Angeles

200 N. Spring Street, Room 763

Los Angeles, CA. 90012

Re: 12124 Pacific Avenue, LA 90066

Dear Ms. Ahn,

This letter is in support of the development of 12124 Pacific Avenue. This new housing will be a big benefit to the area and a much better use of the property than it's been for many years. It also will increase housing that is needed badly and will add 11 low-income units to the area.

With the addition of many office buildings in Culver City and Mar Vista where large tech and media companies have moved in, this Pacific Avenue location will help with the need for housing near these large employment hubs. It will make it easy for these residents to use public transportation rather than drive their cars as it's only about one block away from Venice Blvd. which is a major thoroughfare.

This beautiful new building will be a great benefit to the neighborhood, and I sure hope you approve this project.

Truly Yours,

A handwritten signature in dark ink, appearing to read "Gary Fox", is written over a horizontal line.

Gary Fox

Los Angeles, CA. 90034



Planning CPC <cpc@lacity.org>

FW: 12124 Pacific Ave - Project Support Letter Item 6

Matthew Hayden <matthew@haydenplanning.com>

Wed, Aug 9, 2023 at 9:37 AM

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

Cc: Esther Ahn <esther.ahn@lacity.org>, "jjmartin100@gmail.com" <jjmartin100@gmail.com>

Good morning,

Sending this per email below.

Thanks

Matthew

From: Esther Ahn <esther.ahn@lacity.org>**Sent:** Tuesday, August 8, 2023 5:07 PM**To:** Jeff Martin <jjmartin100@gmail.com>**Cc:** Matthew Hayden <matthew@haydenplanning.com>; Planning CPC <cpc@lacity.org>**Subject:** Re: 12124 Pacific Ave - Project Support Letter

Good afternoon,

I'm confirming receipt for the case file and public record, but to ensure that your submission is part of the August 10th CPC package, please send your message directly to cpc@lacity.org, who I've cc'd here, and reference Item No. 6 on the upcoming agenda.

Many thanks,

Esther

On Tue, Aug 8, 2023 at 4:13 PM Jeff Martin <jjmartin100@gmail.com> wrote:

Dear Ms Ahn,

I'm a westside resident writing to support the proposed project at 12124 Pacific Ave. The new apartment building looks great and is thoughtfully designed. New housing is needed in Mar Vista and this project will bring new units – including affordable units for Very Low-Income tenants. With high rents on the westside having affordable housing units included

is a major benefit and the City needs them built. The project is in a great area and will really benefit the community. Please approve the application!

Kind Regards,

Jeff Martin

Esther Ahn

City Planner

Los Angeles City Planning

200 N. Spring St., Room 763

Los Angeles, CA 90012

T: (213) 978-1486 | Planning4LA.org

August 9, 2023

Attn Commission Office

RE: Item No. 6 on Agenda – August, 10 2023 Meeting

Subject: 12124 W. Pacific Avenue
Letter of Support

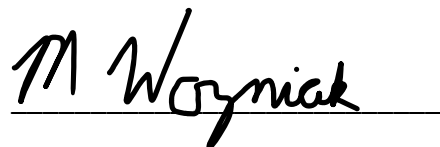
This letter is in support of the proposed development at 12124 W. Pacific Avenue. The location just off Venice Boulevard is excellent and has connections to transit, businesses, and many community amenities in the surrounding area.

The new housing, including both market rate and affordable units, will improve the neighborhood. The new units will provide housing and help address the city's need for housing. Additionally, 11 of the units will be reserved for very low-income households for 55 years to help meet the housing needs for all segments of the population.

The building will greatly enhance Pacific Avenue and significantly improve the site and benefit the community.

We look forward to this project being built and request that you approve it.

Sincerely,

A handwritten signature in black ink, reading "M Wozniak", is written over a horizontal line.

Mike Wozniak