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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



633 West Fifth Street
Suite 5880
Los Angeles, CA 90071
213.557.7222
www.rpnllp.com

Todd Nelson
213.557.7225
Todd@rpnllp.com

December 12, 2024

VIA EMAIL

President Esther Hatch and Honorable Members of
the Harbor Area Planning Commission
City of Los Angeles
200 N. Spring Street, Room 272
Los Angeles, CA 90012

apcharbor@lacity.org

Re: 625 Beacon Project, December 17, 2024 APC Meeting, Agenda Item 5

Dear President Hatch and Honorable Commission Members:

This firm represents the applicant for the 625 Beacon project ("Project"), which will develop 281 new housing units and new ground-level commercial uses on a one-block development site bounded by Beacon Street, 6th Street, Palos Verdes Street, and 7th Street in San Pedro. This Commission originally approved this development in 2021, and at your December 17, 2024 meeting, you will consider the applicant's request for a Modification of Entitlement to authorize various changes to the building's originally proposed design.

As described in the staff report, the proposed design changes do not increase the Project's density, height, or floor area, and are limited to changes in parking stall count, parking stall location, locations of proposed open space, and façade design and materiality. As a result of these changes, the applicant believes the Project will provide an improved public open space design along 6th Street, a reduction in building massing, and an overall enhanced design aesthetic. As noted in the staff report prepared for the Commission, the City's Urban Design Studio provided comments on the Project, to which the applicant team has provided responses, included in Attachment 1 to this letter. The applicant appreciates the thoughtfulness of these comments and intends to implement them to the greatest extent feasible.

We concur with staff's recommendation to grant approval of the Modification of Entitlement, with one requested revision to the currently proposed conditions of approval. Specifically, Condition 8.a of the staff report specifies the exact number of vehicular parking spaces required for the Project, based on the proposed residential unit count (281 units), proposed unit mix (10 studios, 101 junior 1-bedrooms, 105 1-bedrooms, and 65 2-bedrooms), and the proposed commercial space, as calculated by the requirements of Los Angeles Municipal Code ("LAMC") Section 12.21 A.4.

During the Project's future plan check process, should any changes occur to the Project's unit mix (e.g., a currently proposed 1-bedroom unit is changed to a 2-bedroom unit, or vice versa) with no changes in the Project's unit count, the Project's parking requirement could slightly change from the numbers currently shown in Condition 8.a, due to the fact that LAMC Section 12.21 A.4 has different parking requirements for 1-bedroom and 2-bedroom units. Under current City practices, any deviation from a number specifically identified in a condition of approval can trigger a need for Planning staff to spend time preparing a letter of clarification, or potentially even require a new Modification of Entitlement approval, even though the project in question remains in full compliance with LAMC requirements.

To address this potential issue while ensuring the Project will be required to remain in compliance with the LAMC's parking requirements, we request that Condition 8.a be revised as follows:

Existing Condition 8.a – proposed to be deleted

- ~~a. Based upon the number of dwelling units proposed and a 10 percent bicycle parking replacement for residential, a minimum of 359 387 residential automobile parking spaces shall be provided for the project. Parking spaces for commercial use shall be provided in accordance with LAMC Section 12.21 A.4 including a 20 percent bicycle parking replacement for commercial, for a minimum of 4 commercial parking spaces. The project proposes 359 500 residential and 4 commercial parking spaces, for a total of 363 504 parking spaces, along with 17 short term bicycle parking spaces and 147 long term bicycle parking spaces as provided in Exhibit "A".~~

New Condition 8.a – proposed to be added

- a. On-site automobile parking shall be provided in accordance with LAMC Section 12.21-A,4.**

In closing, we appreciate the Commission's consideration of the Project and respectfully request that the Modification of Entitlement be approved with the revised condition 8.a as described above. Thank you very much.

Sincerely,



Todd Nelson
Partner
of RAND PASTER & NELSON, LLP

Attachment

cc: Connie Chauv, Department of City Planning
Norali Martinez, Department of City Planning

Attachment 1: Responses to UDS Comments

625 Beacon, San Pedro

Responses to Urban Design Studio Comments

KFA - December 2024

Pedestrian First

- Consider ways to give pedestrian entrance to lobby more emphasis such as by means of creating an overhang, moving the current placement of signage (blocked by street tree), or adding special lighting to better differentiate it from the remainder of the ground floor frontage.

Response: As part of the arcade plaza along 6th St., the entry will need to be differentiated from the retail to the east and community amenities to the west along the arcade. Large pendant light fixtures are being considered for the arcade, and signage will play a role as well. Architecturally, there is a thickened band proposed at approximately the 10' height of the double-height arcade. This band could be accentuated at the retail and the building entry with a slightly projecting canopy profile ($\pm 24"$ out from the face of the storefront, for example) and finished in a different color, such as the yellow accent from above. This projecting canopy could be the support for signage for the retail (e.g. "Coffee Shop") and the residential building (e.g. "Beacon Apartments"). This uniform canopy and signage treatment, along with the lighting, would provide a rhythm down the arcade, accentuating the linear experience parallel to the street.

360° Design

- Elevations need to provide more detail, for example: all materials/colors/finishes, any proposed gates at parking or loading area entries.

Response: As the design develops, emphasis for material and color diversity will be focused on:

- *the ground floor wall graphics, currently called out as large format tile*
- *the vertical fins spanning between balconies*
- *the horizontally-expressed 3rd floor, currently called out as brake metal siding*
- *the concrete columns at the first and second floor encircling the building and accentuating the architectural parti of the 3rd floor "plate"*
- *the metal work of the storefronts and balcony guardrails*
- *the four color accents of the building (main body, corners, lowered mass facing Beacon, and gray wall recesses)*

Note that all four sides of the building at all street frontages will apply the same design features as the primary frontage of the building along 6th St.

- Consider adding more versatility to the material palette as currently, there are only various stucco finishes.

Response: Material changes in metal and tile will be focused on the lower floors closest to the sidewalk, with stucco at the upper floors, per the response above, with the idea that material changes will be most appreciated where people can experience them up close from the public way.

- Consult DWP regarding transformer placement to be relocated or placed underground into a vault. Current placement positions the transformer to be visible along Beacon frontage.

Response: DWP discourages underground vaults, which are also prohibitively costly. The design team recessed the transformer location in a building alcove along Palos Verdes St. to lessen its profile and limit potential visibility from the project's primary frontage along Beacon St.

- For above-grade parking, please refer to the City's Updated Advisory Notice Relative To Above-Grade Parking.

Response: Above grade parking is "wrapped" with non-parking uses (retail, lobby, amenities, residential units) per the referenced guidance as possible. Parking that is not wrapped is partly or mostly below grade. Exterior parking garage walls are proposed to have a non-directional large format tile design that accentuates the architecture of the 3rd floor "plate."

Climate Adapted

- Develop a comprehensive landscape plan addressing the whole site to upgrade the overall contribution to and compatibility with the neighborhood. Include information on existing + proposed street trees and compliance with Landscape Ordinance.

Response: A landscape design has been provided that includes numerous street trees and courtyard trees. The building's redesign includes a courtyard that cuts through the building, allowing light and air to pass through the building and providing an airier backdrop to the Pepper Tree Plaza public park next door.

DAY OF HEARING SUBMISSIONS



Dec 17, 2024

**City of Los Angeles
Harbor Area Planning Commission
Los Angeles City Hall
200 North Spring Street, Los Angeles, CA 90012**

**Re: Proposed Housing Development Project at 625 South Beacon Street,
DIR-2020-2595-SPR-HCA-MI**

By email: apcharbor@lacity.org

**Cc: Norali Martinez, City Planner, norali.martinez@lacity.org; City Clerk's Office,
clerk.cps@lacity.org; City Attorney's Office, cityatty.help@lacity.org**

Dear Harbor Area Planning Commission,

The California Housing Defense Fund ("CalHDF") submits this letter to remind the Commission of its obligation to abide by all relevant state laws when evaluating the proposed 281-unit housing development project at 625 South Beacon Street. Such laws include the Housing Accountability Act (Gov. Code, § 65589.5; the "HAA").

The HAA provides the project legal protections. It requires approval of zoning and general plan compliant housing development projects unless findings can be made regarding specific, objective, written health and safety hazards. (Gov. Code, § 65589.5, subd. (j).) The HAA also bars cities from imposing conditions on the approval of such projects that would reduce the project's density unless, again, such written findings are made. (*Ibid.*) As a development with at least two-thirds of its area devoted to residential uses, the project falls within the HAA's ambit, and it complies with local zoning code and the City's general plan. The HAA's protections therefore apply, and the City must not reject the project except based on health and safety standards, as outlined above.

As you are well aware, California remains in the throes of a statewide crisis-level housing shortage. New housing such as this is a public benefit: it will bring new customers to local businesses; it will grow the City's tax base; and it will reduce displacement of existing residents by reducing competition for existing housing. It will also help cut down on transportation-related greenhouse gas emissions by providing housing in denser, more urban areas, as opposed to farther-flung regions in the state (and out of state). While no one

**360 Grand Ave #323, Oakland 94610
www.calhdf.org**

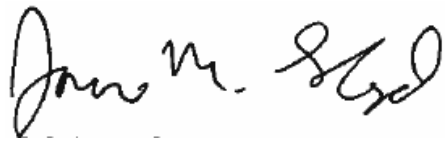
project will solve the statewide housing crisis, the proposed development is a step in the right direction. CalHDF urges the Commission to approve it, including all necessary entitlements, consistent with its obligations under state law.

CalHDF is a 501(c)3 non-profit corporation whose mission includes advocating for increased access to housing for Californians at all income levels, including low-income households. You may learn more about CalHDF at www.calhdf.org.

Sincerely,



Dylan Casey
CalHDF Executive Director



James M. Lloyd
CalHDF Director of Planning and Investigations



Cecilia Lamas <cecilia.lamas@lacity.org>

DIR-2020-2595-SPR-HCA-M1

Aksel Palacios <aksel.palacios@lacity.org>

Tue, Dec 17, 2024 at 2:16 PM

To: Planning APC Harbor <apcharbor@lacity.org>, Cecilia Lamas <cecilia.lamas@lacity.org>

Cc: Pamela Thornton <pamela.thornton@lacity.org>

Hello Cecilia,

I hope this email finds you well, my name is Aksel Palacios and I am Councilmember McOsker's Director of Port & Capital Projects. I am reaching out in regards to the Harbor APC meeting taking place later today in which DIR-2020-2595-SPR-HCA-M1 will be heard. I was planning on attending this meeting in person but came down with an illness over the weekend and will not be able to attend in person.

I wanted to use this email to be added into the record that Council District 15 is in full support of the project and would ask that the Harbor APC look to approve the project. It is a catalyst project that will revitalize a core area of the Downtown San Pedro Community. The developer is close to completing another project not too far from here which has also made an impact in the future of the Downtown San Pedro Community. Please let me know if you need any further information from me, I can also be reached on my cell (562) 565-3876.

best,

Aksel

Aksel Palacios, MPA, AICP

Director, Port & Capital Projects

Office of Councilmember Tim McOsker

15th Council District | City of Los Angeles

Direct Line: 310.473.7015

