

# West Mar Vista Residents Association



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E-Mail: [marvistaneighbors@gmail.com](mailto:marvistaneighbors@gmail.com) Web: [www.stopcommuterschool.com](http://www.stopcommuterschool.com) Facebook: Stop LAUSD commuter school in Mar Vista

August 21, 2017

The Honorable Jose Huizar, Chair, and Members,  
Planning and Land Use Committee  
Los Angeles City Council  
200 N. Spring Street, Room 272  
Los Angeles CA 90012

Re: Committee Hearing, Tuesday, August 22, 2017, 2:30p

## **ITEM 5, COUNCIL FILE 17-0537, CD 11, DIR-2016-304-DB-SPR-1A, CEQA No. ENV-2016-2229-MND**

Dear Chair Huizar and Members:

On behalf of the West Mar Vista Residents Association and the South Mar Vista Residents Association (the Associations), we request that you approve the Charter Section 245 Motion, in Council File 17-0537, and require the City Planning Commission to approve the project as directed in the Motion, for the reasons stated therein.

This request supplements our prior submittals to the City Planning Commission and you to support our appeals of Site Plan Review, Density Bonus Compliance Review, and a Mitigated Negative Declaration for the project at 12440-12492 Venice Boulevard (the Project).

We ask you to deny the Project for failing to meet the criteria for Site Plan Review approval in Los Angeles Municipal Code (LAMC) section 16.05. If the Project is not rejected, all of its impacts that have been brought to your attention and the City's attention should be addressed in an environmental impact report (EIR) prepared pursuant to the California Environmental Quality Act so they may be identified and mitigated.

Additionally, we request that you require the Commission to review its Determination as it awards substantial land use benefits such as higher density and reduced on-site parking based on an incorrect finding of facts that the Project is located within a "Transit Priority Area," thereby qualifying it for those benefits. According to the Southern California Association of Government (the lead agency), the defining street intersection for the Project, "Venice and Centinela, does not qualify as a major transit stop (the intersection of two or more high quality transit corridors). For example, Big Blue Bus Line 14 on Centinela does not meet the 15-minute peak frequency requirement of a high quality transit corridor." The Commission has made an incorrect finding to "qualify" the project for the cited benefits. Consequently, the Commission should be directed to remove this project from consideration for the benefits it has awarded.

Furthermore, the Commission awarded a significant economic benefit to the project developer by reducing the number of required parking spaces. It required only 0.5 parking spaces per bedroom, citing AB 744 (Gov Code Sec 65915(p)(3)(A)). However, the Commission arbitrarily ignored a sub-section of the very same statute section, without any explanation or rationale, that permits a more objective, locally-driven assessment of

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area parking before using the arbitrary 0.5 parking space per bedroom standard. Under Government Code, Section 65915(p)(7), chaptering AB 744:

*(7) Notwithstanding paragraphs (2) and (3), if a city, county, city and county, or an independent consultant has conducted an areawide or jurisdictionwide parking study in the last seven years, then the city, county, or city and county may impose a higher vehicular parking ratio not to exceed the ratio described in paragraph (1), based upon substantial evidence found in the parking study, that includes, but is not limited to, an analysis of parking availability, differing levels of transit access, walkability access to transit services, the potential for shared parking, the effect of parking requirements on the cost of market-rate and subsidized developments, and the lower rates of car ownership for low- and very low income individuals, including seniors and special needs individuals. The city, county, or city and county shall pay the costs of any new study. The city, county, or city and county shall make findings, based on a parking study completed in conformity with this paragraph, supporting the need for the higher parking ratio.*

Clearly, the intent of the state law is to permit local, independent parking studies to justify parking requirements and to only impose an arbitrary standard (such as the 0.5 spaces per bedroom) when jurisdictions did not have such a study. Therefore, we are requesting that you direct the Commission to require the parking study, as defined in law, and incorporate the results and provide its rationale for accepting, modifying or rejecting the study's findings in its final decision

We do not waive any objections previously made in prior appeals and other correspondence submitted to the City by the Associations. Additionally, we again reserve the right to rely upon any comments made by other appellants or members of the public as provided in Public Resources Code section 21177. We also request, under Public Resources Code section 21092.2, copies of any notices related to this Project, specially any Notice of Determination, be sent to us promptly at: [saeedmaliali@netscape.net](mailto:saeedmaliali@netscape.net) or 3629 Maplewood Avenue, Los Angeles CA 90066.

Thank you for your consideration of these comments.

Sincerely,

Saeed Ali, President