

## Communication from Public

**Name:** WALKER A FOLEY  
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**Council File No:** 19-1533  
**Comments for Public Posting:** PLUM Members, Please oppose the Sustainable Communities Project Exemption (SCPE) for this project.

January 20<sup>th</sup>, 2020

Hon. David Ryu

200 N Spring St, Room 425

Los Angeles, CA 90012

Cc:

Leyla Campos, Legislative Assistant

Michelle Carter, Planner

c/o PLUM Committee Members

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Dear Councilmember Ryu and Honorable Members of the PLUM Committee:

On behalf of Food & Water Action, we write to urge you to oppose the Sustainable Communities Project Exemption (SCPE) for the 639 S. La Brea hotel/condo project. In the midst of a climate crisis, projects in the City of Los Angeles should do their utmost to reduce projected greenhouse gas emissions, energy, and water use. The 639 S. La Brea hotel/condo project is far from this standard.

The proposed 639 S. La Brea Project does not fit the requirements necessary for a SCPE, fundamentally relying on speculative mitigations to justify the abbreviated environmental review process. SCPEs require consistency with SCAG Regional Transportation Plan/Sustainable Community Strategies. However, the SCPE does not discuss any of the goals listed in the 2016 Sustainable Community Strategy. It does not identify any strategies (including for example, parking cash out, transit passes and other mechanisms to encourage use of sustainable transportation) the project will employ to comply with the 2016 RTP/SCS. Neither is there any modeling of the project's greenhouse gas emissions to verify it will meet RTP/SCS' goals of reducing GHG emissions by 18% from 2005 levels by 2035 or any

discussion of its compliance with the California Air Resources Board's target reduction of GHG emissions by 19% by 2035. These standards are reflected in the draft 2020 SCAG RTP/SCS per capita targets and similarly left unaddressed in this SCPE.

Additionally, SCPE's are required to prove that water use per capita will be 25 percent more efficient than the average household use in the region. However, the baseline used in the SCPE is based on the 2016 Plumbing Code rather than the 2019 Plumbing Code, effectively overestimating the effective reductions. Similarly, for the required 15% reduction in energy use, the SCPE uses the old Title 24 standards from 2016 and cites only fairly generic measures to justify its projection reduction in energy use.

For the reasons above, the SCPE is fundamentally flawed. We urge the PLUM Committee to require a thorough environmental analysis of this project that meets the standards set in SB 375.

Sincerely,  
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Food & Water Action  
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