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October 28, 2016

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Los Angeles City Hall
200 N. Spring Street
Los Angeles, CA 90012

Re: City Planning Case Nos: CPC-2014-1771-GPA-VZC-SN-VCU-MCUP-ZV-1A;
VTT-72914-2A; and ENV-2014-1773-EIR
Project Address: 1900 S. Broadway

On August 11, 2016, the City Planning Commission certified the EIR and approved VTT-72914 and CPC-2014-1771-GPA-VZC-SN-VCU-MCUP-ZV, for the development of a mixed-use project including 1,444 residential dwelling units; a 208-key hotel; 67,702 square feet of retail/restaurant uses; a 29,355 square-foot grocery store; a 17,507 square-foot gallery; and a 7,879 square-foot fitness studio.

Appeals of City Planning Commission's actions and recommendations of VTT-72914 and CPC-2014-1771-GPA-VZC-SN-VCU-MCUP-ZV were filed on September 19, 2016 and September 26, 2016, respectively. Both appeals were filed by Joe Donlin on behalf of United Neighbors Against Displacement (UNIDAD).

APPEAL ANALYSIS

A. Appeal of VTT-72914

The appellant states that the Advisory Agency erred and abused its discretion in approving VTT-72914 and the City Planning Commission erred and abused its discretion in denying the first level appeal of the Advisory Agency by UNIDAD. Below is a summary of the appellant's grounds for appeal of VTT-72914:

A-I. Subdivision Map Act Findings Are Not Supported By Substantial Evidence.

- a. Consistency with applicable general and specific plans.
The project is not consistent with applicable General and Specific Plans, including the following:

- Objective 1-2: To locate new housing in a manner which reduces vehicular trips and makes it accessible to services and facilities
- Policy 11-2.3: Maximize opportunities for affordable housing and pedestrian access adjacent to rail stations
- Policy 1-5.2: Ensure that new housing opportunities minimizes displacement of the residents
- Policy 2-1.4: Ensure the viability of existing neighborhood stores (i.e., mom-and-pop) which support the needs of local residents and are compatible with the neighborhood

The project is not consistent with the following General Plan Housing Element policies and programs:

- Policy 1.1.2: Expand affordable rental housing for all income groups that need assistance
- Policy 2.5.1: Target housing resources, policies and incentives to include affordable housing in residential development, particularly in mixed use development, Transit Oriented Districts and designated Centers
- Policy 2.5.2: Foster the development of new affordable housing units citywide and within each Community Plan area
- Program 8, Land Use Program to Increase the Production of Affordable Housing: Explore the feasibility and appropriateness of creating affordable housing requirements for projects that receive benefits from the City, including projects that receive City subsidies or City land, projects receiving zone changes that result in significantly more units than otherwise permitted, as well as projects that obtain a Development Agreement. Aim to adopt affordable housing requirements through an ordinance.
- Program 73, Targeting Growth in Community Plan Areas: Update Community Plans and Transit Neighborhood Plans to establish appropriate land uses, densities, and mixes of housing types and levels of affordability in areas well served by public transit, including employment centers and activity centers... When building envelopes are increased, take care not to undermine the density bonus program. Aim to attach community benefits, including affordable housing, to significant bonuses in floor area and density.
- Program 99, Downtown Affordable Housing Bonus: Provide the following incentives for all residential developments in Downtown that include very low-, low-, moderate-income, or workforce housing: 35% more floor area... Explore ways to improve affordable housing production under the program, including... whether the parks fee in lieu of required open space constrains affordable housing development.
- Program 101, Community Level Affordable Housing Programs: With each major community planning effort, establish a goal for the development of affordable housing units based on the current Regional Housing Needs Assessment (RHNA) allocation for the City and Housing Element objectives and policies. Through adoption of Community Plans, Specific Plans or other implementation tools that enable and facilitate residential development, provide incentives for inclusion of affordable housing in residential development and/or other mechanisms that address impacts on the provision or retention of affordable housing units and need. Take care to not undermine the density bonus program by providing significant land-use incentives without an affordable housing provision. Facilitate affordable housing development in existing Specific Plans that include such provisions, including Playa Vista, Central City West and Cornfield Arroyo Seco.

The project is not consistent with the following General Plan Framework Element policies:

- Policy 4.1.6: Create incentives and give priorities in permit processing for low- and very-low income housing developments throughout the City

- Policy 4.2.1: Offer incentives to include housing for very low- and low-income households in mixed-use developments

Staff Response

The Appellant asserts that the project does not comply with the Community Plan's Objective No. 1-2 to reduce vehicular traffic because it will generate traffic. However, as explained on page IV.J-52 on Table IV.J-4 of the Draft EIR, the project is consistent with this objective because it provides housing opportunities for people to live, work and visit while reducing vehicle trips as compared to a project that is not located near transit. As further explained in Table IV.J-4, the project is located two blocks from the Metro Rail Blue Line, within one-third of a mile of the Metro Expo Line, and adjacent to Metro Local and Rapid Lines 14, 35, 37, 38, 40, 45, 48, 55/355, 733, 745, 770, and LADOT Dash Lines: Dash D and Dash Pico Union-Echo Park. To promote bicycle usage, the project includes 1,906 bicycle parking stalls and provides a bike center with bike repair facilities, lockers and showers. In addition, the project is located near Downtown Los Angeles, L.A. Live, Staples Center, USC and other employment centers that are all accessible by public transit and walking and biking.

The Southeast Los Angeles Community Plan's Policy 11-2.3 – to “[m]aximize opportunities for affordable housing and pedestrian access adjacent to rail stations” – is intended to help achieve Objective 11-2 to “increase the work trips and non-work trips made on public transit” and Goal 11 to “develop a public transit system that improves mobility with convenient alternatives to automobile travel.” This goal, objective and policy address public transit access generally. Therefore, Policy 11-2.3 promotes, but does not require, opportunities for affordable housing adjacent to rail stations. Nevertheless, the project achieves Policy 11-2.3 by creating a mixed-use housing development, with the addition of 5 percent of the rental units set aside for Low Income Households, within two blocks of the Metro Rail Blue Line and 0.3 mile of the Metro Expo Line.

Regarding the project's consistency with Community Plan's Policy 1-5.2 regarding new housing opportunities that minimize displacement, the project's location does not result in the displacement of housing and residents because there are no housing units on the project site. Moreover, Policy 1-5.2 is part of Objective 1-5 which seeks “to promote and ensure the provision of adequate housing for all persons regardless of income, age, or ethnic background.” The project helps achieve this objective by developing new housing opportunities for the City, and is therefore consistent with Policy 1-5.2.

The Community Plan's Policy 2-1.4 regarding maintaining the viability of existing neighborhood stores is not relevant to the project because it applies to existing commercial properties in commercially-zoned areas. Specifically, this policy is part of the Community Plan's Goal 2 for a “strong and competitive commercial sector which best serves the needs of the community... while preserving the historic commercial and cultural character of the district.” The project site is not located in a new or historic commercial district, nor are there existing neighborhood stores on the project site. The program identified to implement Policy 2-1.4 in the Community Plan calls for redesignating Highway Commercial sites to Neighborhood Districts and for granting approval for the continued use of existing, nonconforming retail establishments. The project site is not designated Highway Commercial. Regardless, the project is creating new neighborhood-serving uses, including a grocery store, pharmacy, and several retail and restaurant establishments. The project also includes 13 micro retail spaces totaling 4,594 square feet to encourage small businesses and has been conditioned to allow street vendors to operate within the confines of the publically accessible open space. Therefore, the project helps achieve Policy 2-1.4.

The Appellant contends that the project is not consistent with General Plan Housing Element's Policy 1.1.2 to expand affordable rental housing. Policy 1.1.2 is part of Objective 1.1 to “produce an adequate supply of rental and ownership housing in order to meet current and projected needs.” Therefore, Policy 1.1.2 is part of larger objective that promotes housing generally. As

approved and conditioned, the project will set aside 5 percent of the rental units for Low Income Households, creating new rental and ownership housing opportunities and, therefore, achieves Objective 1.1.

Regarding Housing Element Policy 2.5.1, this policy is part of Objective 2.5 to “*promote a more equitable distribution of affordable housing opportunities throughout the City.*” This objective applies to housing generally throughout the entire City and does not require that individual development projects include affordable housing. In addition, Policy 2.5.1 calls for targeting resources, policies and incentives toward the inclusion of affordable housing, and does not require that private development projects include affordable housing. However, as approved and conditioned, the project will set aside 5 percent of the rental units for Low Income Households, thus achieving Policy 2.5.1.

Similarly, Housing Element Policy 2.5.2 “*to foster the development of new affordable housing units citywide and within each Community Plan area*” under Objective 2.5 promotes affordable housing throughout the City generally and does not require the project to include affordable housing. As approved and conditioned, the project will set aside 5 percent of the rental units for Low Income Households, thus achieving Policy 2.5.2.

Program 8 under Objective 1.1 of the Housing Elements calls for the “[*exploration*] of the feasibility and appropriateness of creating affordable housing requirements.” While this Program aspires to create affordable housing requirements, the City does not currently have an ordinance to require affordable housing in new projects. On May 31, 2016, the City’s Planning and Land Use Management Committee considered a report from the Department of City Planning relative to affordable housing policy options and the feasibility of implementing a Value Capture Policy. However, a draft ordinance to implement a Value Capture Policy has not been prepared as of the writing of this Appeal Recommendation Report. Therefore, there is currently no requirement for the proposed project to include affordable housing. However, as approved and conditioned, the project will set aside 5 percent of the rental units for Low Income Households, thus achieving Program 8.

Housing Element Program 73 calls for updates to community plans and transit neighborhood plans. The project does not consist of a community plan update or transit neighborhood plan update. Program 73 is part of Housing Element Objective 2.2 to “*promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services and transit.*” The proposed project helps achieve this objective by resulting in a mixed-use development with jobs, amenities and services near public transit.

Program 99 of the Housing Element identifies incentives for affordable housing development. Program 99 also seeks to explore ways to improve affordable housing production in the Downtown Affordable Housing Bonus area. However, it does not require individual development projects to include affordable housing. As approved and conditioned, the project will set aside 5 percent of the rental units for Low Income Households. However, the project is not utilizing the FAR incentives allowable pursuant to the Greater Downtown Housing Incentive Area.

Housing Element Program 101 applies to the City’s community planning processes in general. As the program states, “*with each major community planning effort, establish a goal for the development of affordable housing units based on the current Regional Housing Needs Assessment (RHNA) allocation for the City.*” The Appellant’s reference to the density bonus program applies when community plans and specific plans are adopted, or when other tools to facilitate residential development are created. The proposed project does not entail the adoption of a community plan.

Regarding consistency with General Plan Framework policies, Policy 4.1.6 is applicable to the City as a whole and is not a mandate on individual development projects. Specifically, Policy 4.1.6

asks the Department of City Planning to “create incentives and give priorities in permit processing for low- and very-low income housing developments throughout the City” and does not exclude the development of market-rate housing. However, as approved and conditioned, the project will set aside 5 percent of the rental units for Low Income Households.

Similarly, General Plan Framework Policy 4.2.1 calls for the City to offer incentives to include very low- and low-income housing in mixed-use developments generally. However, this is citywide policy goal for the City, not a requirement for affordable housing. In addition, Policy 4.2.1 is part of Objective 4.2, that “[encourages] the location of new multi-family housing development...in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.” The project partially helps to achieve this objective by locating multi-family housing near the Metro Blue and Expo Line stations and along two transit corridors – Washington Boulevard and Broadway. In addition, as approved and conditioned, the project will set aside 5 percent of the rental units for Low Income Households.

The Appellant also asserts that the Findings fail to evaluate consistency with the Community Plan and other General Plan policies and programs. The Deputy Advisory Agency, and subsequently the City Planning Commission, has correctly found, based on substantial evidence and as discussed beginning on page 105 of the Letter of Determination dated September 9, 2016, and in the analysis above, that the project is substantially consistent with the applicable objectives of the Southeast Los Angeles Community Plan to locate new housing which reduces vehicular trips, expands opportunities for existing and new businesses, enhances commercial uses in a pedestrian-oriented development, and creates new open space. In addition, the project is substantially consistent with applicable goals, policies and program from the General Plan Housing Element and Framework Element.

- b. Physical suitability of the site for the proposed type and density of development.
 - The findings and conclusions regarding the project’s suitability for the type or density of development are not supported by substantial evidence.
 - Failure to acknowledge or evaluate the site’s history of being zoned for industrial uses, the proposal for signage near freeways, or impacts on neighboring rental housing stock.
 - Project is incompatible with existing uses in the vicinity, including the school campuses and the neighboring building to the north.

Staff Response

The Appellant incorrectly interprets the intent of the Subdivision Map Act’s required findings. Findings “c” and “d” relate to a proposed site’s *physical suitability* for the proposed type and density of development (emphasis added). These findings are based in turn on the 2016 Subdivision Map Act Section 66474, which states that a tentative map approval may be denied if the site is not physically suitable. The project site, as explained in Findings “c” and “d” in the Letter of Determination on pages 110 and 111, is physically suitable because it is not located in a slope stability area, high erosion hazard area or fault/rupture study zone. Section IV.F: Geology and Soils of the Draft EIR corroborates this finding, concluding that the project site has a less-than-significant geological and soil conditions impact with compliance with existing regulations related to the Los Angeles Building Code, earthwork activities, erosion control and drainage, and current building and safety design provisions of the LAMC related to seismic activity. In addition, the project is an in-fill development with existing infrastructure capable of servicing the project. Furthermore, with compliance with the regulatory measures and implementation of the Geology and Soils and Hazards & Hazardous Materials mitigation measures on pages IV.F-13 and IV.H-16 of the Draft EIR, the demolition of the warehouse building, parking lots and the proposed improvements to the existing Reef building do not change the physical suitability of the site.

The Appellant incorrectly analyzes non-physical aspects of the project site: the land use designation, the proposed signage, the potential impact of the project on neighboring rental housing stock, and the project's compatibility with neighboring uses. The project site is located in a highly urbanized area near multiple public transit options and near employment centers. Therefore, the project site is suitable to accommodate growth for the proposed type and density of development. The Draft Southeast Los Angeles Community Plan is proposing a land use change for the project site to Community Commercial, which is consistent with the project's requested General Plan Amendment. The site does not have historical uses related to industrial uses. Since 1894, the project site's historical uses included residential and parking uses, and, in 1948, the small commercial building which now occupies the southeastern corner of the project site was built. A Unocal service station was located on the northwest corner of the East Block between 1960 and 1970. The existing Reef building was constructed in 1958.

Regarding the Appellant's concern about the project's proposed signage, the City Planning Commission approved the creation of a Supplemental Use Sign District with limited signage. Specifically, the approval includes the following: the maximum height of the project identity sign on the north facade of the north residential tower shall be limited to 150 feet to the top of sign; the maximum height of the two project identity signs on the existing Reef building shall be limited to the top of existing parapet, approximately 153 feet to the top of sign; and digital signage and supergraphics are prohibited.

Regarding the Appellant's concern about the project's impact on neighboring rental housing stock, the Appellant's assertion that the development is "luxury housing" is incorrect. The project is proposing a mixed-use development with housing, a hotel, commercial, and open space components that include rental or condominium units. The Appellant does not provide a definition for what constitutes luxury housing. Moreover, the rents for these dwelling units are speculative at this point and, in addition, the Appellant has failed to provide substantial evidence that the project would impact neighboring rental housing stock. The Appellant states "other important considerations," but does not detail what those are.

Regarding the Appellant's concern about the project's incompatibility with neighboring uses, such as the Los Angeles Trade Technical College, Santee Education Complex and the Rutland Apartments, the Letter of Determination on pages 111-112 compares these and other uses to the project to explain the neighborhood context, including the levels of and compatibility with densities in the project vicinity. However, Finding "d," as written on pages 111-112 of the Letter of Determination, is related to whether "the site is physically suitable for the proposed density of development," not whether a project is compatible with existing, neighboring uses. As with the site's suitability for the proposed type of development, the project site is also physically suitable for the proposed density of development. As explained in the Letter of Determination, the project is introducing new residential and commercial uses on underutilized lots that mostly consist of surface parking. Because the project site is mostly vacant except for the Reef building and a small warehouse building proposed to be demolished, the site is physically capable of supporting the project's proposed density. In addition, the tract map is conditioned upon approval of the requested General Plan Amendment and Zone Change. With the approvals for these requests, the site is physically suitable for the proposed density because it complies with LAMC requirements for parking, yards and open space. In conclusion, the Appellant has not rendered substantial evidence that the project site is not physically suitable for the proposed type and density.

- c. Likelihood of the design of the subdivision and improvements to cause substantial environmental damage.

Staff Response

The EIR discloses the project's significant and unavoidable impacts related to Aesthetics, Air Quality and Transportation. Contrary to the Appellant's claim, the Draft EIR provided substantial evidence for these conclusions in Draft EIR sections IV.B-1: Aesthetics; IV.C-1: Air Quality; and IV.N-1: Transportation. The Letter of Determination dated September 9, 2016, beginning on page 47 in section "Findings Required to Be Made by Lead Agency under CEQA", analyzes the project's potential impacts and, beginning on page 77 in section "Environmental Impact Found to Be Significant and Unavoidable," also discloses the significant and unavoidable impacts. The City recognizes that significant and unavoidable impacts remain and, accordingly, adopted a Statement of Overriding Considerations because the project's benefits outweigh and override the significant unavoidable impacts.

- d. Likelihood of the design of the subdivision and proposed improvements to cause public health problems.

Staff Response

As stated in the 2016 Subdivision Map Act in Section 66474(f), a tentative map can be denied if *"the design of the subdivision or type of improvements is likely to cause serious public health problems"*. Finding "f" of the Letter of Determination addresses whether the design and improvement of the subdivision in and of itself affects public health. Vesting Tentative Tract Map No. 72914 involves the merger and re-subdivision of a 9.7-acre site into four ground lots and 76 airspace lots designed to accommodate the project's underground parking, Reef building basement, and above-ground levels for the project's commercial and residential uses. The design of the subdivision in and of itself does not cause public health problems. Regarding the subdivision's improvements, the Bureau of Engineering reports that since the improvements of the proposed subdivision are required to connect to the City's sanitary sewer system, where the sewage is directed to the Hyperion Treatment Plant, the subdivision improvements do not violate the California Water Code. Therefore, no public health problems arise from discharge of effluent into the ocean. The EIR also discloses that there would be less-than-significant impacts from hazards and hazardous materials, noise, and public services with implementation of mitigation measures and compliance with existing regulations. The Appellant has not provided any substantial evidence that the design and the proposed improvements of the subdivision are likely to cause serious public health problems.

Contrary to the Appellant's claim, the EIR addresses direct and indirect displacement. The project does not directly displace existing residents. The FEIR evaluated the Appellant's claim that 43,000 people would be at risk for financial strain and/or displacement as result of the project's impacts on housing prices in the surrounding area, and found that these claims were speculative. As previously stated, no substantial evidence has been presented people regarding indirect displacement resulting from the project.

The EIR also evaluated the results of the Health Impact Report and concludes that there is no substantial evidence in the Health Impact Report that the project is likely to increase property values. The Health Impact Report itself discloses that the possible effects of rising property values are speculative. Contrary to the Appellant's assertion, the Draft EIR did evaluate the ways the project fosters economic or population growth and finds that the project increases employment, population and housing on the project site, but not to a level that requires the extension of major infrastructure into areas that aren't planned for urban growth. In addition, the project does not exceed forecasts of employment, population and housing growth. The Appellant also states the Health Impact Study found that *"housing instability, living in substandard housing, overcrowding, and homelessness are all determinants of poor health..."* and *"disruption of social networks through forced serial displacement and root shock can lead to additional health challenges..."*,

however neither of these claims regarding public health can be directly attributed to the development of the approved project.

Finally, CEQA Guidelines Section 15131(a) states that economic or social effects of a project shall not be treated as significant effects on the environment, unless a cause and effect relationship can be established that an economic and social effect would result in an adverse *physical* effect on the environment (emphasis added). Similarly, case law, including *Preserve Poway v. City of Poway* (D066635) 4th Dist., March 9, 2016, make it clear that a project's non-physical effects are not to be treated as effects on the environment. The Appellant has not provided any new specific evidence to establish a physical effect resulting from speculative displacement. Therefore, CEQA clearly states that such speculative, non-physical effects shall not be treated as significant.

A-II. The FEIR's Conclusions and the Planning Commission's CEQA Findings Are Not Supported by Substantial Evidence.

- a. The Project aesthetics are entirely different from the current aesthetic of the neighborhood in which the Project would be located, and changes should be made to the Project including fewer signs, smaller and fewer billboards, and less lighting.

Staff Response

The Appellant's statement regarding aesthetics expresses an opinion and is not a substantive comment on the analysis presented in the Draft EIR, the Final EIR or the Letter of Determination, dated September 9, 2016. Full disclosure of the project's impacts related to aesthetics – including the effects of project signage – are found in the Draft EIR Section IV.B-1: Aesthetics. Nevertheless, the City Planning Commission approved limited signage as compared to what was analyzed in the EIR. Specifically, the approval of the Supplemental Use Sign District includes the following: the maximum height of one project identity sign on the north facade of the north residential tower shall be limited to 150 feet to the top of sign; the maximum height of the two project identity signs on the existing Reef building shall be limited to the top of existing parapet, approximately 153 feet to the top of sign; and all digital and supergraphic signs are prohibited.

- b. The Project will likely result in indirect displacement, and the findings of the Health Impact Report should have taken into account and the corresponding impacts mitigated.

Staff Response

Contrary to the Appellant's claim, the EIR addresses direct and indirect displacement. The project will not directly displace residents because the project will replace existing parking lots and will not result in the loss of any housing units. The FEIR evaluated the Appellant's claim that up to 43,000 people would be at risk for financial strain and/or displacement as result of the project's impacts on housing prices in the surrounding area, and found that these claims were speculative. The Health Impact Report states that "*...research on the relationship between gentrification and displacement has so far been mixed. In other words, not all research showed a relationship between gentrification and displacement.*" The report goes on to state that "*Since the Reef Development Project and other projects in South Central Los Angeles have the potential to attract a wealthier set of residents to the neighborhood, landlords may experience a growing incentive to evict low-income renters from their homes in order to rent to higher-income residents with the ability to pay more.*" However, the report does not provide any evidence that this will actually occur. Therefore, no substantial evidence has been presented regarding indirect displacement resulting from the project.

The EIR also evaluated the results of the Health Impact Report and concludes that there is no substantial evidence in the Health Impact Report that the project is likely to increase property values. The Health Impact Report itself discloses that the possible effects of rising property values are speculative. In addition, contrary to the Appellant's assertion, the Draft EIR did evaluate the ways the project fosters economic or population growth and finds that the project increases employment, population and housing on the project site, but not to a level that requires the extension of major infrastructure into areas that aren't planned for urban growth. In addition, the project does not exceed forecasts of employment, population and housing growth. Finally, CEQA Guidelines Section 15131(a) states that economic or social effects of a project shall not be treated as significant effects on the environment, unless a cause and effect relationship can be established that an economic and social effect would result in an adverse *physical* effect on the environment (emphasis added). Similarly, case law, including *Preserve Poway v. City of Poway* (D066635) 4th Dist., March 9, 2016, make it clear that a project's non-physical effects are not to be treated as effects on the environment. The Appellant has not provided any new specific evidence to establish a physical effect resulting from speculative displacement. Therefore, CEQA clearly states that such speculative, non-physical effects shall not be treated as significant.

- c. The Project's true growth-inducing impacts and cumulative impacts should have been analyzed and mitigated in the FEIR.

Staff Response

The EIR analyzed population growth and cumulative impacts in Section IV.L of the Draft EIR. The EIR found that the project will result in a 1,161 net increase in employment while the cumulative net increase in employment, including the project will total 41,211. As stated in the EIR, *"the effects of the cumulative employment growth associated with the Project and other development within the Southeast Los Angeles Community Plan area would be consistent with the level of planned growth, and the Project would not contribute to a cumulatively considerable effect with respect to employment."*

In addition, the project will accommodate population growth between 2,224 and 6,309 new residents, while the cumulative population increase including the project would be 14,453 new residents, within the Southeast Los Angeles Community Plan area. As stated in the DEIR, *"The addition of these new residents within the Project would be within the SCAG growth projection, representing between 1 percent and approximately 2.85 percent of the Citywide total growth for the period of 2008 to 2020, and between approximately 0.7 percent and approximately 1.9 percent of the Citywide total growth for the period of 2020 and 2035."* As such, *"the Project would not contribute to a cumulatively considerable effect with respect to population growth."* Because the project will not result in significant impacts related population and employment, no mitigation is required. As such, the appellants claim that population growth was not analyzed is false.

- d. The City should address the Project's potential to exacerbate Los Angeles' current affordable housing crisis by requiring the inclusion of affordable housing.

As previously mentioned, current City codes and the General Plan do not require individual projects to provide affordable housing units on-site. However, as approved and conditioned, the project will set aside 5 percent of the rental units for Low Income Households to address the need for affordable housing in the immediate area.

- e. The FEIR should have included an Environmental Justice section to account for the impacts that will be felt by low-income community of color surrounding the Project.

Staff Response

The Appellant incorrectly contends that the FEIR should have included an environmental justice section. CEQA does not currently require an analysis of environmental justice. Nothing in the 2016 statute itself or the CEQA Guidelines, specifically in Appendix G: Environmental Checklist Form, mentions a requirement for an environmental justice analysis. Notwithstanding, State law (Gov. Code, Section 65040.12 subdivision e) defines environmental justice as “the fair treatment of all people of all races, cultural, and incomes with respect to the development, adoption, and enforcement of environmental laws, regulations, and policies.” The project complies with the requirements of CEQA – including but not limited to the required comment periods for the Draft EIR and Final EIR and the public hearings to consider the requested entitlements – and, therefore, has treated members of the community fairly with respect to implementation of environmental laws. In conclusion, the Appellant’s claim that the project must require an environmental justice analysis is unsupported.

- f. The DEIR contained numerous inaccuracies and improper deferral of impact analysis and mitigation, which were not resolved in the FEIR.

Staff Response

The Appellant states that the DEIR contained an inaccurate project description, inaccurate characterization of the impacts and improper deferral of mitigation measures that were not resolved in the FEIR. Notwithstanding, the project description is used without modification throughout the Draft EIR to evaluate potential environmental impacts and therefore meets the requirements for a project description pursuant to CEQA Guidelines Section 154124. Contrary to the Appellant’s claim that the Draft EIR is inconsistent due to the Land Use Equivalency Program and Design Guidelines, the Draft EIR evaluated the potential effects of these two programs in each section of the Draft EIR. The Letter of Determination beginning on page 69 in Section N: Land Use Equivalency Program and Design Guidelines further explains that the Land Use Equivalency Program requires that potential land use exchanges do not exceed the project’s PM Peak Hour or Friday Evening Hour traffic, and that no new wastewater generation is created that exceeds that of the project. In the event the applicant or subsequent applicants should choose to utilize the Land Use Equivalency Program or the Design Guidelines, the subsequent phase(s) of the project are subject to LAMC Section 106.5 (Site Plan Review) in addition to the provisions stated on page II-37 of the Draft EIR. The Land Use Equivalency program is identified in “Q” Condition No. 13 of the Letter of Determination for Case No. CPC-2014-1771-GPA-VZC-SN-VCU-MCUP-ZV, as approved by City Planning Commission, which is tied to the approval of VTT-72914. Program However, the approval of the City Planning Commission does not include a condition that would allow the applicant to utilize the Design Guidelines that were analyzed in the EIR. In addition, utilization of the Land Use Equivalency Program would require either a Supplemental EIR, Addendum or Subsequent EIR to satisfy the requirements of CEQA. Contrary to the Appellant’s assertion, this does not represent. Therefore, the Appellant has not rendered any substantial evidence that the project description or Land Use Equivalency and Design Guidelines violate CEQA.

- g. The Sign District approved by the City Planning Commission on August 11, 2016 is not analyzed in the June 2016 FEIR.

Staff Response

The EIR analyzed the most intensive signage program proposed, including digital signage located up to a height of 420 feet, as well as Alternative 3: Reduced Height/Reduced Signage, that includes the same amount of signage as the project, albeit located at lower heights. Although the approved project includes a substantial reduction in signage, the new project information is not

considered “significant” for CEQA purposes. As such, pursuant to CEQA Guidelines Section 15088.5, the EIR and FEIR do not require recirculation to evaluate the Sign District approved by the City Planning Commission.

- h. Per the November 2, 2105 DEIR comment letter and July 15, 2016 UNIDAD appeal of VTT-72914, the FEIR’s conclusions regarding the impacts of the original Sign District proposed by the applicant are inadequate and unsupported by substantial evidence.

Staff Response

Contrary to the Appellant’s assertion, Public Counsel’s concerns stated in their comment letter are addressed in the FEIR, including in Responses to Comments 9-5, 9-7, and 9-18. Specifically, Public Counsel claims that the DEIR fails to address the City’s ban on signage within 2,000 feet of a freeway. As explained in Response to Comment 9-5, the Public Counsel letter fails to cite the full extent of LAMC Section 14.4.6, which states that signs are prohibited “unless the Department of Building and Safety has first determined that the sign will not be viewed primarily from a main travelled roadway of a freeway, or an on-ramp/off-ramp.” As explained in Response to Comment 9-5, the project signs are only visible from the Southbound I-110 at a distance of 2,200 feet from the project site and views of the signage occur for only two minutes for a vehicle traveling at 30 miles per hour. For Northbound I-110 travelers, only the signage at the top of the hotel building is visible from a distance of 1,200 feet south of the Adams Boulevard off-ramp, but for no more than 800 feet before the freeway alignment goes below ground level. Therefore, the project signage cannot be “viewed primarily from” the I-110 freeway. The phrase “viewed primarily from” is defined in LAMC Section 14.4.6(a) as a sign being seen “with reasonable clarity for a greater distance by a person traveling on the main traveled roadway of a freeway or on-ramp/off-ramp than by a person traveling on the street adjacent to the sign.” The views of the signage from the I-110 freeway are intermittent, limited in time duration, distant and, therefore, not prominent. Similarly, project signage is not viewed primarily from the Westbound I-10 or the Eastbound I-10 as explained in the FEIR, because there are no direct, head-on views of the project site. Instead, views are oblique and, in addition, the proposed signage does not exceed the California Motor Vehicle Code threshold for light distraction. The Appellant has failed to provide substantial evidence that the project signage is “primarily viewed” from nearby freeways.

The Appellant also fails to provide substantial evidence that the project’s signage would “eviscerate” the City’s ban on freeway facing billboards according to the Ninth Circuit’s *World Wide Rush LLC et al v. City of Los Angeles*. First, as discussed above, the Appellant fails to render evidence that the project’s signage is primarily visible from freeways. Second, the Appellant’s claim is speculative, as it is contingent on a hypothetical scenario in the future. The Ninth Circuit’s 2010 *World Wide Rush LLC et al v. City of Los Angeles* does not concern the Reef project signage. The Appellant also misquotes the Ninth Circuit’s opinion as saying that the signage would “break the link between Freeway Facing Sign Ban and the City’s objectives in traffic and aesthetics.” The exact quotation on page 7597 of *World Wide Rush v. Los Angeles* is: “Here, as in *Metro Lights*, the City’s decision to permit some freeway facing billboards at the Staples Center and in the Fifteenth Street SUD does *not* break the link between the Freeway Facing Sign Ban and the City’s objectives in traffic safety and aesthetics” (emphasis added). The full quotation undermines the Appellant’s speculative claim. As mentioned previously, CEQA does not require an analysis of speculative claims. Third, the Appellant incorrectly identifies the project signage as “billboards.” Although the FEIR Response to Comment 9-7 explains that the project proposes visual displays that change at different rates, not billboards, the project as proposed and conditioned by City Planning Commission does not include any digital signage and the amount of signage is less intensive than the signage evaluated in the EIR.

The Appellant erroneously claims that the FEIR states that the project “would amount to the single largest concentration of outdoor electronic signage in the City.” FEIR Response to Comment 9-6,

on page III-112, states that “while...the Project would substantially increase lighting levels over the existing levels, the signage at LA Live...is substantially more concentrated than the proposed signage at the Project.” The Appellant also incorrectly infers that project signage would have a significant impact on the health of residents of the Rutland Apartment. The Letter of Decision’s Statement of Overriding Considerations discloses that large animated signs in Vertical Sign Zone 3 have a significant impact on the Rutland Apartments. However, this impact relates to the Aesthetics impacts of the project, and not to health impacts on residents. As previously stated, CEQA’s primary goal is to protect the physical environment. In addition, FEIR Response to Comment 9-6 refutes the applicability of the studies cited in Public Counsel’s letter on the health effects of nighttime lighting to the project. As explained in the FEIR, the studies address the health effects of indoor lighting on residents, not on external lighting. The Appellant has failed to provide substantial evidence about how the studies are applicable to the project. Finally, the FEIR does not state that residents can “draw their blinds to shield themselves from the Project’s electronic signage.” Page III-111 of the FEIR states that Public Counsel’s cited health studies regarding indoor lighting “do not evaluate the [health] effects when one is screened from outdoor sources by being inside with the blinds drawn.” Thus, FEIR Response to Comment 9-6 refutes the methodology of the study and does not recommend that residents “draw their blinds.” In conclusion, the Appellant’s claims about the health effects of project signage are speculative. In accordance with CEQA Guidelines Section 15384, “speculation... does not constitute substantial evidence.”

B. Appeal of CPC-2014-1771-GPA-VZC-SN-VCU-MCUP-ZV

The appellant states that the City Planning Commission’s approval of the project is an abuse of discretion and that the findings and conclusions are not supported by substantial evidence. Below is a summary of the appellant’s grounds for appeal of CPC-2014-1771-GPA-VZC-SN-VCU-MCUP-ZV:

- B-I. The Project Is Inconsistent With Numerous General Plan Policies and Programs, and Does Not Conform to Good Zoning Practice.
- a. As proposed, the Project would improperly undermine the existing affordable housing programs.
 - b. The Project conflicts with General Plan policies to increase affordable housing near transit.
 - c. The Project fails to adequately address displacement and community destabilization impacts.
 - d. The Project threatens to exacerbate our City’s homelessness crisis.

Staff Response

See response A.I.a above.

- B-II. The Planning Commission’s Conditional Use Permit Findings Are Not Supported by the Evidence and Certain Planning Commission Decisions Are Not Supported by the Findings.
- a. The Planning Commission Findings that the Project will enhance the building environment in the surrounding neighborhood or perform a function or service that is essential to the community is unsupported.

Staff Response

The Appellant claims that Finding 3a to allow Floor Area Averaging does not provide evidence. Finding “a” asks if the project will enhance the built environment in the surrounding neighborhood or will the project perform a function or provide a service that is essential or beneficial to the

community. However, page F-22 of the Letter of Determination dated September 9, 2016, explains that the project site encompasses two City blocks, thus requiring the FAR request. The project site will be developed with 1,444 residential units, including 21 live/work units; a 208-key hotel; 67,702 square feet of retail/restaurant uses; a 29,355 square-foot grocery store; a 17,507 square-foot gallery; and a 7,879 square-foot fitness studio. The existing Reef building will be maintained and includes an 8,000 square-foot rooftop restaurant addition. The development of these uses will provide employment, community serving commercial uses and residential units near transit, thus enhancing the environment and provide a service that is beneficial to the community.

- b. The Conditional Use Permit Finding that the Project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare and safety is not supported by substantial evidence.

Staff Response

As stated in Staff Response A.I.d above, the Appellant states the Health Impact Study found that "housing instability, living in substandard housing, overcrowding, and homelessness are all determinants of poor health..." and "disruption of social networks through forced serial displacement and root shock can lead to additional health challenges...", however neither of these claims regarding public health can be directly attributed to the development of the approved project.

- c. The Project does not substantially conform to the purpose, intent and provisions of the General Plan, the applicable Community Plan, and any applicable Specific Plan.

Staff Response

See response A.I.a above.

- d. The additional Planning Commission Findings necessary to approve a Conditional Use Permit for alcohol sales are not supported by substantial evidence.

Staff Response

In accordance with LAMC Section 12.24-W,18, the City Planning Commission made the required additional findings necessary to approve a Master Conditional Use permit for the on- and off-site sale and dispensing of a full line of alcoholic beverages. Page F-39 of the Letter of Determination dated September 9, 2016, states the following:

"Due to high crime statistics, conditions typically recommended by the Los Angeles Police Department, such as those related to the STAR Program, installation of surveillance cameras and age verification, have been imposed in conjunction with this Master Conditional Use Permit approval. Each establishment is part of a larger development that will benefit from oversight of the project as a whole. In addition, concerns associated with any individual establishment will be addressed in more detail through the required Approval of Plans determination. A Zoning Administrator will have the opportunity to consider more specific operational characteristics as each tenant is identified and the details of each establishment are identified. Security plans, floor plans, seating limitations and other recommended conditions, as well as the mode and character of the operation, will be addressed and assured through site specific conditions."

In addition, the approval includes Condition 10.d, requiring that the "applicant or individual operator file a plan approval(s) with the Department of City Planning pursuant to Section 12.24-

M of the LAMC prior to the utilization of any grant made herein pursuant to the sale of alcoholic beverages”, prior to obtaining a license from the Department of Alcohol Beverage Control. As such, the City Planning Commission made the required findings to approve the Master Conditional Use permit for the sale of alcohol.

- e. The additional Planning Commission Major Development Project Findings are not supported by substantial evidence.

Staff Response

The Appellant claims that the additional Major Development Project findings are unsupported. However, page F-34 of the Letter of Determination dated September 9, 2016, not only describes the project in detail but also describes the surrounding area as

“...highly urbanized and includes a mix of low- to high-intensity commercial, civic, educational and residential uses. The existing buildings include: the Panama Travel Agency, Sports Museum and Santee Education Complex to the east; a furniture store, 12-story creative office building, and a variety of retail stores to the north; the Los Angeles Municipal Court building and DMV vehicle inspection site to the west; and a variety of retail and commercial supply stores to the south.”

The Appellant disputes that the project is providing much-needed housing for the immediate area, although the project is providing 1,444 residential units with 5 percent of the rental units to be set aside for Low Income Households. The project, as well as another recently approved project nearby, will provide housing for the Southeast Los Angeles Community Plan area. Although the two residential towers will be taller than other existing buildings in the surrounding area, as stated in the Letter of Determination:

“The buildings integrate a pedestrian scale at ground level by incorporation of a variety of textures, materials, street furniture and landscaping appropriate to the project site, thereby minimizing the effects of building mass and street walls in relation to street frontage. Architectural features such as recessed and angled entrances, storefront glazing, tenant signage, and pedestrian-scaled lighting also help to create a pedestrian oriented building frontage.”

As such, the City Planning Commission’s findings adequately evaluate the project’s compatibility with the surrounding neighborhood.

B-III. The Project is Inconsistent with the Draft Southeast Los Angeles Community Plan.

Staff Response

The Appellant claims that the project is inconsistent with the Draft Southeast Los Angeles Community Plan. However, page F-1 of the Letter of Determination dated September 9, 2016, states the following:

“In addition, the Draft Southeast Los Angeles Community Plan update seeks to amend the community plan map. As part of the plan update, a General Plan Amendment is required to create consistency among existing/future developments and designated land uses. The Draft Plan seeks to change the project site, including all of the properties fronting Washington Boulevard to the north and south between Hill Street and San Pedro Street, from “Limited Manufacturing” to “Community Commercial” land use, thus, creating a unified pattern of zoning and corresponding land use designation along Washington Boulevard. The proposed change to Community Commercial is based on the determination of the Industrial Land Use Policy that identifies the area as a transition

district as well as input from community members, stakeholders and representatives from Council District 9.”

As mentioned by the Appellant, the proposed CPIO calls for the development of TOD projects. The mixed-use project clearly demonstrates that it is a TOD project with its proximity to several transit lines, abundance of bicycle parking and bicycle amenities, ground floor retail uses, enhanced pedestrian street crossings, sidewalk improvements, and publically accessible open space. In addition, as approved and conditioned by the City Planning Commission, the project will set aside 5 percent of the rental units for Low Income Households. As such, the claim that the project is inconsistent with the Draft Southeast Los Angeles Community Plan is unsubstantiated.

B-IV. The Project is Inconsistent with the City’s Industrial Land Use Policy.

Staff Response

The Appellant claims that the Findings of the City Planning Commission for the General Plan Amendment are unsupported. However, the Letter of Determination dated September 9, 2016 states that the *Industrial Land Use Policy* (ILUP) identifies the area, including the project site, as a transition district. In addition, page F-11 of the Letter of Determination states the following

“Transition Districts are areas where the viability of industrial uses have been compromised by significant conversions and where the transition to other uses should continue. Identified Transition Districts are areas where alternate policies such as specific plans, Transit Oriented Districts (TOD) and other planning efforts are anticipated or are in process. Unlike Industrial Mixed-Use Districts, stand-alone housing or mixed-use developments containing housing and commercial uses may be appropriate in Transition Districts.”

Contrary to the Appellants claim, the ILUP does not require the provision of on-site affordable housing. However, as approved and conditioned by the City Planning Commission, the project will set aside 5 percent of the rental units for Low Income Households.

B-V. The Sign District Should Not Have Been Approved.

- a. The proposed Sign District does not conform to public necessity, convenience, general welfare and good zoning.

Staff Response

The Appellant states that the City Planning Commission approval of the Sign District is arbitrary and capricious. The Appellant raised the issue that *“large-scale signs would be illuminated into the evening hours, oriented toward this existing residential use”* (referring to the Rutland Apartments located across the street from the project site) and again mentioned Public Council’s DEIR comment letter. As previously stated, the Sign District approved by City Planning Commission prohibits all digital signage. Therefore, no illuminated signage would be oriented towards existing residential uses.

Regarding the Appellants claim regarding freeway facing signage, please see Staff Response A.II.h above. Additionally, Sign District Finding “c” of the Letter of Determination dated September 9, 2016, states the following:

“Although the project will result in unavoidable traffic impacts, no impacts to traffic safety due to permitted signs under the Sign District will occur. Signs are arranged and regulated in a manner that will not pose hazards to traffic or pedestrian safety. As such, the project is subject to conditions of approval, as well as project design features and mitigation measures, to minimize any adverse effects due to traffic. Specifically, mitigation measures MM-TR-12 and

MM-TR-13, include vehicle trip reduction measures to encourage the use of transit and reduce vehicle trips, thereby minimizing potential operational parking and traffic impacts on the surrounding street system to the maximum extent feasible. In addition, any signage that is visible from the Santa Monica I-10 Freeway, exceeds 660 feet from the I-10 right-of-way. Therefore, the project is not subject to the regulations of the Outdoor Advertising Act.”

The approved project would advance traffic safety with implementation of the mitigation measures listed above and included in the adopted Mitigation Monitoring Program. As such, the claim that the Sign District should not be approved is unsubstantiated.

- b. The Planning Commission Sign District Findings are inconsistent with the Planning Commission's approved Sign District.

Staff Response:

Planning staff inadvertently failed to omit all references to digital signage in the Sign District Ordinance approved by City Planning Commission specifically to Sign Zone A, Vertical Sign Level 2. A letter revising that portion of the Sign District Ordinance, deleting all references to digital signage that reflects the decision by the City Planning Commission, has been submitted to the PLUM committee for consideration.

B-VI. The Planning Commission Site Plan Review Findings Are Not Supported by Substantial Evidence.

Staff Response

The Appellant states that the City Planning Commission Findings are unsupported. As mentioned previously, the project complies with many goals, policies and objectives of the City's General Plan and the corresponding elements (see Staff Response A.1.a above). The Appellant also disputes the Finding "c" regarding the project's recreational and service amenities. Finding "c" clearly describes the recreational areas provided for project residents with the following:

"...the project includes 162,255 square feet of open space in the form of landscaped courtyards and pathways and other open space features that connect the various proposed uses, in compliance with LAMC Section 12.21-G. Eight-five percent of the open space is designated common open space and 15 percent is designated private open space (e.g., unit patios). The residential open space amenities include multiple swimming pools, a fitness center, and a community room. The common open space for residents on the east block is divided into three main spaces. The Farm includes outdoor dining space, BBQ's, a garden, a seating grove, and a reservoir pool. The Playground includes active space for project residents, an outdoor dining area, BBQs, an outdoor movie screen, undulating seating decks, a spa and pool, outdoor lounges, a yoga lawn, and a step fountain. The Platform is a community gathering space with movable seating, planters, and a fire pit or water feature.

In addition, the EIR prepared for the project found that with implementation of regulatory requirements, such as the payment of the Dwelling Unit Construction Tax and/or the payment of Quimby Fees, impacts to local parks and recreation facilities will be less than significant. Therefore, it is determined that the project provides sufficient recreational and service amenities to serve residents without creating negative impacts on neighboring properties."

As such, the claim that the City Planning Commission's Site Plan Review findings are unsupported is unsubstantiated.

B-VII. The Project's Request for a Variance with Respect to Tree Planting Should be Denied.Staff Response

The Variance Findings in the Letter of Determination dated September 9, 2016 clearly state why the reduction in trees is necessary. The findings state the following:

"The project includes a total of 162,255 square feet of open space (73 percent common open space), slightly more than the LAMC requirement. A minimum of 25 percent of the common open space will be planted with ground cover as required by the LAMC. The open space provided includes a mix of public and private courtyards, gathering spaces and passageways.

In order to comply with the LAMC requirement for trees, the vast majority of green space will be dedicated to tree planting, causing trees to be planted closely together, thus providing inadequate area for proper canopy growth and roots and making the open space unusable for gathering or recreation."

To offset the approval for a reduction in the number of trees planted on-site, the Applicant is required to comply with the Condition 2.3.1(a) of the approved Development Agreement:

City Plants: The Developer shall pay a total of \$200,000 to City Plants to cover the procurement, delivery, planting labor, concrete cut, maintenance, watering, stakes/ties, arbor guards, administration and accounting for the plating of trees at off-site locations in the Southeast Los Angeles Community Plan area. The administrator for City Plants shall submit a letter acknowledging receipt of the fund(s) and in addition, the Developer shall submit documentation demonstrating compliance with this obligation as part of the required annual review described in Section 4.1 below.

Delivery: \$100,000 prior to issuance of 1st Building Permit for Reef for Phase 1, and \$100,000 prior to issuance of Building Permit for Phase 2."

As such, the claim that the Variance should be denied is unsubstantiated.

B-VIII. The Evidence Does Not Support Approving a General Plan Amendment, and the Proposed Amendment Was Not Properly Initiated.Staff Response

As stated in Charter Section 555, *"The General Plan may be amended in its entirety, by subject elements or parts of subject elements, or by geographic areas, provided that the part or area involved has significant social, economic or physical identity."* Section 3a, pages F-10 through F-11, of the Letter of Determination clearly states that the project will have a significant social, economic and physical identity by: creating physically altering the project site from surface parking lots to a mixed-use project in a transit-oriented district; encouraging pedestrian activity and the use of public transit and bicycles; and creating jobs within the existing and new commercial uses, the hotel and during construction of the project. As such, the City Planning Commission provided sufficient evidence to approve the General Plan Amendment.

As stated on page F-11 of the Letter of Determination dated September 9, 2016, the Director of Planning proposed the amendment to the Southeast Los Angeles Community Plan (General Plan Land Use Element), pursuant to Council instructions to the Department of City Planning in a motion by Councilmember Curren Price on May 13, 2014 (Council File No. 14-0620). In response to the motion, a subsequent request was filed by the applicant on May 19, 2014, using City Planning Form 7750, requesting that the City Planning Commission initiate a Plan Amendment on behalf of the Director of Planning consistent with the requested Zone Change. The request is

located in the case file. As such, the appellants claim that the GPA was not properly initiated is unsubstantiated.

B-IX. The FEIR's Conclusions and the Planning Commission's CEQA Findings are Not Supported by Substantial Evidence.

- a. The Project aesthetics are entirely different from the current aesthetic of the neighborhood in which the Project would be located, and changes should be made to the Project including fewer signs, smaller and fewer billboards, and less lighting.
- b. The Project will likely result in indirect displacement, and the findings of the Health Impact Study should have been taken into account the corresponding impacts mitigated.
- c. The Project's true growth-inducing impacts and cumulative impacts should have been analyzed.
- d. The City should address the Project's potential to exacerbate the Los Angeles' current affordable housing crisis by requiring the inclusion of affordable housing.
- e. The FEIR should have included an Environmental Justice section to account for the impacts that will be felt by low-income community of color surrounding the Project.
- f. The DEIR contained numerous inaccuracies and improper deferral of impact analyses and mitigation, which were not resolved in the FIER.
- g. The Sign District approved by the City Planning Commission on August 11, 2016 is not analyzed in the June, 2016 FEIR.
- h. Per the November 2, 2015 DEIR comment letter dated July 15, 2016 UNIDAD appeal of VTT-72914, the FEIR's conclusion regarding impacts of the original Sign District proposed by the Applicant are inadequate and unsupported by substantial evidence.

Staff Response

See Staff Response A.II above.

Conclusion

Being as the appellants have failed to adequately disclose how the City Planning Commission erred or abused its power in its actions relative to the EIR and the associated entitlements, Planning staff respectfully recommends that the appeals be denied.

Sincerely,



Sarah Molina Pearson
City Planner
Major Projects, Department of City Planning