

XI. COMMENTS

This document contains comments received by the City of Los Angeles (City) during and after the public review period for the proposed Permanent Supportive Housing (PSH) Ordinance Mitigated Negative Declaration (MND).

Letter Number	Comment Letter
100-A	Channel Law Group, LLP (Oxford Triangle Association)
100-B	Channel Law Group, LLP (Venice Vision)
101-A	Channel Law Group, LLP (Oxford Triangle Association)
101-B	Channel Law Group, LLP (Venice Vision)
102	Advocates for the Environment
103	Oxford Triangle Residents (various senders)
104	LA Sanitation (Los Angeles Department of Public Works)
105	Governor's Office of Planning and Research, State Clearinghouse

Channel Law Group, LLP

8200 Wilshire Blvd.
Suite 300
Beverly Hills, CA 90211

Phone: (310) 347-0050
Fax: (323) 723-3960
www.channellawgroup.com

JULIAN K. QUATTLEBAUM, III *
JAMIE T. HALL **
CHARLES J. McLURKIN

Writer's Direct Line: (310) 982-1760
jamie.hall@channellawgroup.com

*ALSO Admitted in Colorado
**ALSO Admitted in Texas

December 20, 2017

VIA ELECTRONIC MAIL

City of Los Angeles
Department of City Planning
City Hall - Room 763,
200 North Spring Street,
Los Angeles CA 90012

Via email: darlene.navarrete@lacity.org
and: cally.hardy@lacity.org

**Re: Comments On The Environmental Documentation For, And The,
Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-
3137) And Proposed Redevelopment Of Thatcher Yard located at 3233 S.
Thatcher Avenue (APN 4229-002-901)**

Dear City Council Members:

This firm represents Oxford Triangle Association with regard to the proposed development at 3233 S. Thatcher Avenue as well as the Permanent Supportive Housing Ordinance proposed by the City of Los Angeles (City). The City released the Permanent Supportive Housing (PSH) Ordinance for a 60-day comment period beginning on August 31, 2017 and ending on October 30, 2017. On October 30, 2017 Channel Law provided the City with comments on the Permanent Supportive Housing (PSH) Ordinance, including comments on:

- The lack of availability of a California Environmental Quality Act (CEQA) document during the public review period for the PSH Ordinance;
- The inaccurate project description provided as part of the answers to the Frequently Asked Questions attached to the Notice requesting comments on the PSH Ordinance;
- The failure of the PSH Ordinance Notice to disclose the creation of a new CEQA exemption;
- The inadequate project description resulting from failure to describe the number and location of PSH developments;
- The inadequate requirement for the provision of supportive services, and its potential to result in environmental consequences; and,

- The need to address the potential for growth-inducing impacts, cumulative impacts, and increased water demand.

Channel Law’s comment letter is incorporated herein by reference and included as **Attachment 1** to this letter. Channel Law asked a number of questions regarding the PSH Ordinance and also made the following suggestions regarding ways to amend the PSH Ordinance in that letter, including:

- Remove the new CEQA exemption for PSH projects; instead the existing CEQA low-income housing exemption should be applied.
- Include language in the Ordinance to make clear that pursuant to CEQA Guidelines Section 15268(d) where a PSH project involves an approval that contains elements of both a ministerial action and a discretionary action, the project will be deemed to be discretionary and will be subject to the requirements of CEQA.
- Allow for automatic rezoning of only those parcels addressed in the environmental document for the proposed Ordinance, or specifically addressed in the environmental document for the applicable area plan.
- Add requirements for provision of an appropriate level of supportive services to be maintained over the life of individual PSH projects.

Channel Law has not received responses to our questions or comments. Channel Law’s comment letter was not included in the December 14, 2017 Staff Report and agenda packet for the Planning Commission. Furthermore, Channel Law’s comments and suggestions have been largely ignored, and have not been adequately addressed in the December 14, 2017 Staff Report, including the following Exhibits to the Staff Report:

- A - Proposed Permanent Supportive Housing Ordinance
- B - Environmental Clearance
 - B.1 Mitigated Negative Declaration
 - B.2 Addendum to the SCAG 2016-2040 RTP/SCS PEIR, SCH No. 2015031035
- C - Affordable Housing Opportunity Sites

On November 30, 2017 the City released the Mitigated Negative Declaration (MND) for the project, for public review and comment. The City has not circulated the “Addendum” to the SCAG 2016-2040 RTP/SCS PEIR or noticed the availability of the Addendum.

This comment letter provides comments on both the City’s flawed process and problems with the environmental documents for the PSH Ordinance. We would request responses to both the comments contained in this letter, and our October 30, 2017 letter.

1. THE CITY’S PROCESS FOR REVIEWING AND APPROVING THE PERMANENT SUPPORTIVE HOUSING ORDINANCE IS FATALLY FLAWED

The City has engaged in a confusing and fatally flawed process regarding the adoption of the Permanent Supportive Housing Ordinance (PSH Ordinance).

1.1 The City Conducted Public Hearings and Ended The Comment Period On The Ordinance Prior to Release of the Environmental Document

The City released the PSH Ordinance for a 60-day comment period beginning on August 31, 2017 and ending on October 30, 2017. During the 60-day comment period, staff held two public hearings on the PSH Ordinance, on: September 25, 2017 and September 28, 2017. The comment period thus ended a month before the City's November 30, 2017 release of the MND for the project.

The failure to provide the public with the MND for the PSH Ordinance until one month after the close of the public comment period on the PSH Ordinance has inappropriately limited public comment on the PSH Ordinance, in violation of Public Resources Code (PRC) Section (§) 21003.1 and CEQA Guidelines §15004 which states:

(b) Choosing the precise time for CEQA compliance involves a balancing of competing factors. EIRs and negative declarations should be prepared as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment.

...

(c) The environmental document preparation and review should be coordinated in a timely fashion with the existing planning, review, and project approval processes being used by each public agency. These procedures, to the maximum extent feasible, are to run concurrently, not consecutively. When the lead agency is a state agency, the environmental document shall be included as part of the regular project report if such a report is used in its existing review and budgetary process.

Channel Law commented in our October 30, 2017 letter on the fact that failure to provide the public with a copy of the CEQA document during the public review period inhibited the ability of the public to comment on, or fully understand, the potential impacts of the proposed PSH Ordinance. In addition, requiring the public to separately comment on the PSH Ordinance and then subsequently on the MND for the project, unduly burdens the public, since as noted in the Channel Law letter, a full description of the components and sites affected by the PSH Ordinance was not made available to the public during the comment period on the Ordinance.

According to the Staff Report for the December 14, 2017 Planning Commission hearing on the PSH Ordinance, the City has made the following changes to the August 30, 2017 version of the PSH Ordinance:

- References were added to State Density Bonus law to make clear that the ordinance is intended to create permanent supportive housing units consistent with state density bonus provisions. This revision ensures that the grant of any bonuses, incentives, or concessions under this ordinance shall not be considered an increase in density or other change which requires any corresponding zone change, general plan amendment, specific plan

exception, or discretionary action. This does not supersede or in any way alter or lessen the effect or application of the Coastal Act.

- To ensure general plan land use consistency, the amendment to the PF Zone was revised to allow the application of the least restrictive adjacent zone, in lieu of the least restrictive zone within 1/4-mile radius of the project site.
- To more closely align with other incentives, a modification was made to allow for up to 20% relief in any other development standard not already specified, in lieu of 35% relief.
- The construction standards were revised to be more consistent with Mitigation Measures included in the Mitigated Negative Declaration prepared for the ordinance.
- The definition of a Qualified PSH Project was amended to reflect recent changes to definitions for project funding requirements under Measure HHH and ensure that these requirements are in alignment.
- The setback incentive was revised to respect prevailing front yards in residential zones.
- To further ensure high quality, pedestrian-scale design, additional design standards were added related to screening of parking structures.

The modified PSH Ordinance was not made available to the public concurrent with the release on the MND for the PSH Ordinance. In addition, it is unclear whether the MND analyzes the August 17, 2017 or current version of the PSH Ordinance. Which version is analyzed in the MND?

1.2 The Planning Commission Took Action on the Project Prior to The Close of the MND Comment Period

The PSH Ordinance was considered by the Planning Commission on December 14, 2017, prior to the close of the 20-day comment period on the MND on December 20, 2017. At the Planning Commission hearing, recommended actions included (See **Attachment 2** – Audio Links Item 12):¹

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| RECOMMENDED

ACTIONS: | <ol style="list-style-type: none">1. Recommend adoption of the proposed ordinance (Exhibit A);2. Adopt the staff report as the Commission report on the subject;3. Adopt the attached Findings;4. Recommend that the City Council FIND that pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including Mitigated Negative Declaration No. ENV-2017-3137-MND ("Mitigated Negative Declaration-) (Exhibit B.1), and all comments received, with imposition of mitigation measures, there is no substantial evidence that the project will have a Significant effect on the |
|-----------------------------|---|

¹Item CPC-2017-3409-CA <https://planning.lacity.org/InternetCalendar/pdf.aspx?Id=59215>
See Attachment 2 – Item 12 with a link to the Audio of hearing:
<https://planning.lacity.org/InternetCalendar/pdf.aspx?Id=59322>
<http://planning.lacity.org/StaffRpt/Audios/CPC/2017/12-14-2017/13%20CPC-2017-3409.mp3>

environment; FIND the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; FIND the mitigation measures have been made conditions on the project; and ADOPT the Mitigated Negative Declaration; and

5. **Recommend** that the City Council FIND, based on their independent judgment, after consideration of the whole of the administrative record, including the SCAG 2016-2040 RTP/SCS PEIR, SCH No. 2015031035, certified on April 7, 2016 (EIR) and the Addendum prepared for the Permanent Supportive Housing Ordinance (Addendum) (Exhibit B.2), the project was assessed in the EIR and pursuant to the CEQA Guidelines, Sections 15162 and 15164 and the Addendum that no major revisions to the EIR are required and no subsequent EIR or negative declaration is required for approval of the project.

The Planning Commission took the actions recommended by Staff. As noted in the Letter of Determination dated December 19, 2017 for the PSH Ordinance included as **Attachment 2**, the Planning Commissions actions included the following finding (emphasis added):

1. Found pursuant to CEQA Guidelines Section 1507 4(b), after consideration of the whole of the administrative record, including Mitigated Negative Declaration No. ENV-2017- 3137-MND (Mitigated Negative Declaration), **and all comments received**, with imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; Found that the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; Found the mitigation measures have been made enforceable conditions on the project; and adopt the Mitigated Negative Declaration; and Adopted the Mitigated Negative Declaration and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;
- ...
4. Approved and recommended that the City Council adopt the proposed ordinance, as amended by the Commission, subject to review by the City Attorney as to form and legality; and
5. Adopted and recommended that the City Council adopt the attached Findings.

The Planning Commission's findings contain an untruth. The Planning commission could not have considered comments on the MND before approving the ordinance, since the Planning Commission acted before completion of the public comment period on the MND. This is a violation of CEQA Guidelines § 15004(b), which states:

- (2) To implement the above principles, public agencies shall not undertake actions concerning the proposed public project that would have a significant adverse effect or limit the choice of alternatives or mitigation measures, before completion of CEQA compliance. For example, agencies shall not:

- (A) Formally make a decision to proceed with the use of a site for facilities which would require CEQA review, regardless of whether the agency has made any final purchase of the site for these facilities, except that agencies may designate a preferred site for CEQA review and may enter into land acquisition agreements when the agency has conditioned the agency's future use of the site on CEQA compliance.
- (B) Otherwise take any action which gives impetus to a planned or foreseeable project in a manner that forecloses alternatives or mitigation measures that would ordinarily be part of CEQA review of that public project.

1.3 The City Circulated The Mitigated Negative Declaration For 21-Days, Rather Than The 30-Days Required For A Project Of Area-Wide Significance

The MND for the PSH Ordinance was release for public review and comment on November 30, 2017 for a 21-day period ending December 20, 2017. As noted on page II-1 of the MND: "The Proposed Ordinance would apply citywide." The MND is for a project of area-wide significance, as defined in CEQA Guidelines §15206(b)(2).² Therefore, pursuant to CEQA the MND should have been circulated for 30-day public review and comment.

As shown in MND Figure 4, included in **Attachment 4**, PSH-eligible parcels are located throughout the City and in close proximity to other jurisdictions. The proposed project has the potential to result in impacts that extend beyond the City in which the project is located.

Recent research has indicated the potential for the construction of PSH to induce in-migration of additional homeless into a Continuum of Care (CoC) area or inhibit out-migration of homeless.³ A Continuum of Care (CoC) is a regional or local planning body that coordinates housing and services funding for homeless families and individuals. There are 414 CoCs in the United States. The Los Angeles CoC covers the Los Angeles County area, but excludes the cities of Glendale, Pasadena and Long Beach. There are 88 incorporated cities in Los Angeles County. The PSH Ordinance thus has the potential to impact 85 of the cities and the County of Los Angeles, which are part of the Los Angeles CoC.

The proposed project is of area-wide significance as defined in CEQA Guidelines §15206(b)(2) since it will result in the construction of more than 500 dwelling units. As noted on page II-4 of the MND: "The City's Comprehensive Homeless Strategy identified a need to build at least 1,000 PSH units per year, an increase of up to 700 units from its current average production rate of approximately 300 units per year. As noted on page II-5 of the MND:

² In addition, several of the round-one parcels are located within the Coastal Zone, as shown on MND Figure 5. **Attachment 3** contains the City of Los Angeles Parcel Profile Report for the parcels located at 125 E Venice Boulevard (The Venice Dell Pacific Site, incorrectly listed as 200 E Venice Boulevard in the MND and Exhibit C to the Staff Report) and Thatcher Yard parcel at 3238 Thatcher Avenue, showing that these two parcels are located in the Coastal Zone. Therefore any EIR required for the project would need to be circulated to the State Clearinghouse pursuant to CEQA 15206(b)(4)(C).

³ Corinth, Kevin. "The Impact of Permanent Supportive Housing on Homeless Populations." Journal of Housing Economics 35 (2017) 69-84. Page 75. Available at: https://ac.els-cdn.com/S1051137715300474/1-s2.0-S1051137715300474-main.pdf?_tid=0cedc104-ba9c-11e7-a99d-00000aacb35f&acdnat=1509056685_fceb158ca8e69a34586fd1d9d46ba052

Based on this study, and due to the fact that the construction of PSH is constrained by the availability of public funding, it is reasonably foreseeable that the Proposed PSH Ordinance could, with the most generous assumptions (and conservative for purposes of environmental review), result in the construction of an additional 200 units per year of PSH in addition to the 1,000 units per year anticipated to result from Measure HHH and other previously approved gap-funding projects. Therefore, for purposes of the City's analysis of the PSH Ordinance in this MND, the City is analyzing the impacts of construction and operation of 2,000 units constructed over a 10-year period (200 units/year). Construction of the other 10,000 or 1,000 units a year for the next 10 years is part of the cumulative development allowed by the previously approved gap funding projects, identified above.

The public and affected and responsible agencies have been provided with inadequate time to review and comment on the MND for the PSH Ordinance. The PSH Ordinance should have been circulated for a 30-day comment period.

1.4 Violation of CEQA Guidelines § 15072(b) - The City Failed To Provide The Notice As Required By CEQA To Channel Law

In Channel Law's October 30, 2017 letter on the PSH Ordinance on page 2, Channel Law requested that the City:

Please contact us and provide information on the timeline for CEQA compliance and the type of CEQA document to be prepared. Indicate how participation in the CEQA process will be coordinated with the Ordinance review and consideration process. Please provide any notices or other information regarding this Ordinance to us at the address listed on our letterhead.

Although Jamie Hall of our office did receive email notice, on December 7, 2017⁴ (at 5:36 PM) from Cally Hardy - Los Angeles City Planning Assistant, regarding the fact that: "The Permanent Supportive Housing Ordinance (CPC-2017-3136-CA) has been scheduled for next Thursday's (12/14) meeting of the City Planning Commission," Channel Law received no notice regarding the availability of the MND or Addendum for the project, despite having commented on the need for CEQA compliance prior to approval of the PSH Ordinance, and having requested provision of notices or other information regarding this matter. CEQA Guideline § 15072 requires in part that:

- (b) The lead agency shall mail a notice of intent to adopt a negative declaration or mitigated negative declaration to the last known name and address of all organizations and individuals who have previously requested such notice in writing . . .

⁴ On November 30, 2017 the City released the Mitigated Negative Declaration (MND) for the project, for public review and comment. Notice of the Planning Commission hearing and how to access the Staff Report for the hearing was not received until December 7, seven days after the start of the comment period on the MND.

The City thus failed to proceed in the manner proscribed by law, and inhibited Channel Law's ability to participate in the CEQA process by failing to provide notice of the availability of the CEQA documents.

1.4. The City's Notice of Intent to Adopt the MND Fails to Comply with the Noticing Requirements of CEQA Guidelines Section 15070(g)

The environmental notice for the MND (Mitigated Negative Declaration-NG-17-140-PL: ENV-2017-3137) is included as **Attachment 5**. It states:

MITIGATED NEGATIVE DECLARATION-NG-17-140-PL: ENV-2017 3137. Citywide zoning ordinance affecting all parcels in the City of Los Angeles zoned for multifamily residential use & located within High Quality Transit Areas (HQTAs). Additionally, PSH development could occur on some parcels zoned Public Facilities (PF), and on some sites which are currently protected under the City's Residential Hotel Unit Conversion & Demolition Ordinance in LAMC Section 47.70 et seq. CD's 1-15. The Proposed Permanent Supportive Housing (PSH) Project is an ordinance (PSH Ordinance) that would amend the City of Los Angeles Municipal Code (LAMC) to facilitate development of PSH units. The purpose of this ordinance is to improve the process for the development of these units. The Proposed PSH Project would amend Sections 12.03, 12.04.09, 14.00 & 16.05 of the LAMC establishing regulations that define PSH & project eligibility criteria, establish unique development standards for PSH, and facilitate administrative review & approval, as well as modify certain provisions related to height & density, consistent with State Density Bonus Law. The PSH Ordinance would allow for projects to select up to four concessions with respect to Zoning Code, including up to 20% decrease in required setbacks, up to 20% reduction in required open space, up to 20% increase in lot coverage limits, up to 35% increase in FAR and depending on the height district up to a 35% increase in height or one additional story. Additional design requirements include that when adjacent to or across an alley from an R2 or more restrictive zone, the building's transitional height shall be stepped-back within a 45-degree angle. REVIEW/COMMENT period ends: Dec. 20, 2017.

The notice fails to include the following information required by CEQA Guidelines § 15070(g):

- (g) A notice of intent to adopt a negative declaration or mitigated negative declaration shall specify the following:
 - (2) The starting and ending dates for the review period during which the lead agency will receive comments on the proposed negative declaration or mitigated negative declaration. This shall include starting and ending dates for the review period. If the review period has been shortened pursuant to Section 15105, the notice shall include a statement to that effect.
 - (3) The date, time, and place of any scheduled public meetings or hearings to be held by the lead agency on the proposed project, when known to the lead agency at the time of notice.
 - (5) The presence of the site on any of the lists enumerated under Section 65962.5 of the Government Code including, but not limited to lists of

hazardous waste facilities, land designated as hazardous waste property, and hazardous waste disposal sites, and the information in the Hazardous Waste and Substances Statement required under subdivision (f) of that section.

The Notice fails to include several required items. Although the notice is dated November 30, 2017, it fails to specially state the starting and ending dates for public review per CEQA Guidelines § 15070(g)(2). Although a Planning Commission hearing was held on December 14, 2017 and separately noticed on December 7, 2017, the environmental notice published on the City's website and in the Los Angeles Times fails to list the date, time and place of this known public meeting per CEQA Guidelines § 15070(g)(3). Although the MND identifies the potential for PSH sites to be included on a list of hazardous materials sites complied pursuant to Government Code Section 65962.5, and includes a mitigation measure to address this,⁵ the environmental notice published by the City fails to identify this, per CEQA Guidelines § 15070(g)(5).

1.5 The City Inappropriately Relies In-Part On An Addendum Prepared By The City to An EIR Prepared By Another Agency

In an effort to provide cover for the City's failure to both prepare an adequate MND for the project and to comply with MND process requirements specified in CEQA, the Planning Commission was also presented with a second, separate environment document for the PSH Ordinance: a City-prepared Addendum to the Program Environmental Impacts Report (PEIR) for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by the Southern California Association of Governments (SCAG).⁶ This was included as a separate environmental document for the PSH Ordinance. This was no doubt done in order to further frustrate the ability of the public to review and comment on the environmental document for the project, since an Addendum need not be circulated for public review.

According to the Letter of Determination included in **Attachment 2**, Planning Commission then took the following action at its December 14, 2017 meeting:

At its meeting of December 14, 2017, the Los Angeles City Planning Commission took the actions below in conjunction with the approval of the proposed ordinance: . . .

2. Approve and recommend that the City Council find, based on their independent judgement, after consideration of the whole of the administrative record, including the SCAG 2016-2040 RTP/ SCS PEIR (SCH No. 2015031035), certified on April 7, 2016 (EIR) and the Addendum prepared for the PSH Ordinance (Addendum), the project was assessed in the EIR and pursuant to the CEQA Guidelines, Sections 15162 and 15164 and the

⁵ MND pages III-5 and IV-37 to IV-39.

⁶ A copy of the PEIR is available at: <http://scagrtpscscs.net/Pages/DRAFT2016PEIR.aspx>

Copies of the SCAG's two Addendums are available at:

<http://scagrtpscscs.net/Pages/FINAL2016PEIR.aspx>

<http://scagrtpscscs.net/Pages/2016RTPSCSAmendments.aspx>

Addendum that no major revisions to the EIR are required and no subsequent EIR, or negative declaration is required for approval of the project;

Use Of Both An MND and Addendum For The Same Project Is Inappropriate

Nowhere in CEQA is it contemplated that a Lead Agency would prepare two concurrent and separate environmental documents for a project. Doing so is particularly egregious when the public has been afforded inadequate time to review one of the documents and no time to review the other. In fact, preparation of the Addendum is contrary to a number of CEQA precepts, including:

- PRC § 21003, which states in part: “(f) All persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical, and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment.”
- Guidelines §15002(a), which states: Basic Purposes of CEQA. The basic purposes of CEQA are to: (1) Inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities.
- Guidelines §15002 (j), which states: Public Involvement. Under CEQA, an agency must solicit and respond to comments from the public and other agencies concerned with the project. (See: Sections 15073, 15086, 15087, and 15088.)

Addendum Process Failed To Comply With CEQA

Not only is the use of an Addendum inappropriate in this case for a number of reasons, the City has failed to comply with the procedural requirements for an Addendum. The requirements for use of an Addendum are specified in CEQA Guidelines §15164

15164. ADDENDUM TO AN EIR OR NEGATIVE DECLARATION

- (a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- (c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- (d) The decision making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
- (e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency’s findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

The Addendum prepared by the City does not specify the changes or additions that are necessary SCAG’s RTP/SCS PEIR to address the PSH Ordinance. As required by Guidelines §15164(c) the final PEIR was not provided along with the Addendum to the Planning Commission. As required by Guidelines §15164(d) the Planning Commission did not consider the Addendum with the final prior to making a decision on the project.

The City's preparation of an Addendum is clearly an attempt to circumvent criticism of inadequate provisions for public review of the MND for the PSH Ordinance. This is ironic, given, as shown in **Attachment 6**, the Southern California Association of Governments (SCAG) sent both the PEIR and the SCAG's Addendums to the RTP/SCS PEIR to the State Clearinghouse.⁷ The City has sent neither the MND nor the Addendum to the State Clearinghouse. SCAG not only circulated the Draft EIR for the RTP/SCS for public comment from 12/4/2015 to 2/1/2016, SCAG also circulated its Addendum to the RTP/SCS PEIR for public review and comment from 7/10/2017 to 8/24/2017 (see **Attachment 6**). The City has provided no opportunity for public review and comment on its "Addendum" to the RTP/SCS EIR, nor has it provided the Lead Agency for the PEIR, SCAG, with the opportunity to comment on the Addendum to the RTP/SCS PEIR.

Violation of CEQA Guidelines §15153

Given that the City's Addendum provides no information on the modifications to the RTP/SCD PEIR that are necessary to make the document adequate as the environmental document for the PSH Ordinance, the City is essentially making use of an EIR from an earlier project, the 2016-2040 RTP/SCS. While it is questionable whether a Lead Agency may make use of another agency's EIR for their own project, if the City were to do so, it would need to comply with the requirements of Guidelines §15153, which state in part:

15153. USE OF AN EIR FROM AN EARLIER PROJECT

- (a) The Lead Agency may employ a single EIR to describe more than one project, if such projects are essentially the same in terms of environmental impact. Further, the Lead Agency may use an earlier EIR prepared in connection with an earlier project to apply to a later project, if the circumstances of the projects are essentially the same.
- (b) When a Lead Agency proposes to use an EIR from an earlier project as the EIR for a separate, later project, the Lead Agency shall use the following procedures:
 - (1) The Lead Agency shall review the proposed project with an Initial Study, using incorporation by reference if necessary, to determine whether the EIR would adequately describe:
 - (A) The general environmental setting of the project,
 - (B) The significant environmental impacts of the project, and
 - (C) Alternatives and mitigation measures related to each significant effect.
 - (2) If the Lead Agency believes that the EIR would meet the requirements of subdivision (1), it shall provide public review as provided in Section 15087 stating that it plans to use the previously prepared EIR as the draft EIR for this project. . .
 - (3) The Lead Agency shall prepare responses to comments received during the review period.

Use of an EIR from an earlier project thusly does not absolve the City from the need to provide the public with the opportunity to review and comment on the EIR being used.

⁷ SCH # 2015031035.

The City Should Have Tiered Off the RTP/SCS PEIR Rather Than Prepared an Addendum to the RTP/SCS PEIR

Rather than prepare an Addendum to a Program EIR that was not prepared by the City, CEQA would dictate that the City prepare one environmental document for the PSH Ordinance and tier that environmental document off the RTP/SCS PEIR, if appropriate. This is in fact what SCAG envisioned cities would do, when it prepared the RTP/SCS PEIR. As explained by SCAG on page 1 of Addendum # 2 to the RTP/SCS PEIR:

Pursuant to Section 15152 of the CEQA Guidelines, subsequent environmental analyses for separate, but related, future projects may tier off the analysis contained in the 2016 RTP/SCS PEIR.

This is in fact noted in the City's Addendum, for the PSH Ordinance, which states on pages 1-2, that SCAG envisioned the 2016 RTP/SCS PEIR be used for tiering:

The 2016 RTP/SCS PEIR was drafted as a first tier document that would support local agencies in the SCAG region in considering subsequent projects. As stated in the 2016 RTP/SCS PEIR:

This PEIR provides a first-tier, programmatic environmental analysis, for a long range, regional scale plan document that will support local agencies in the evaluation of subsequent projects, and facilitate avoidance, reduction, and minimization of direct and indirect impacts, growth-inducing impacts, and cumulative environmental impacts with respect to local projects. The project proponent seeking to construct and operate individual properties will need to identify the public agency who will have the primary discretionary land use decision with respect to second tier projects. Consistent with the provisions of Section 15050(a) of the State CEQA Guidelines, the determination of the appropriate second-tier level of environmental review will be determined by the lead agency with primary discretion and decision-making authority for subsequent projects being considered for approval that is subject to CEQA. (RTP/SCS PEIR at 1-2.)

The tiering process is described in PRC §21094 and CEQA Guidelines §15152. As required by PRC §21094(c):

- (c) For purposes of compliance with this section, an initial study shall be prepared to assist the lead agency in making the determinations required by this section. The initial study shall analyze whether the later project may cause significant effects on the environment that were not examined in the prior environmental impact report.

As explained in CEQA Guidelines §15152(f), depending on the outcome of the Initial Study, the Lead Agency may then prepare either a EIR or negative declaration. There is no provision in CEQA or Guidelines §15152 for preparing an addendum when tiering:

- (f) A later EIR shall be required when the initial study or other analysis finds that the later project may cause significant effects on the environment that were not adequately addressed in the prior EIR. A negative declaration shall be required when the provisions of Section 15070 are met.

The City has inappropriately prepared an Addendum for the PSH Ordinance. The Addendum can not and does not excuse the flaws in the MND process for the PSH Ordinance.

2. COMMENTS ON THE STAFF REPORT FOR THE PSH ORDINANCE

2.1 Staff Report and MND Provide Unclear and Conflicting Information Regarding Application of the PSH Ordinance to the Venice Dell Pacific Site and the Thatcher Yard Site

100-1

City's Staff Report provide the following unclear and conflicting information regarding the applicability of the PSH Ordinance to the Venice Dell Pacific and Thatcher Yard Sites, stating:

Applicability of PSH Ordinance to Specific Sites

Staff have received numerous comments from members of the public pertaining to specific project sites (see "*Public Communications*"). The proposed ordinance was not drafted with any particular sites in mind, but rather to amend citywide land use regulations governing the development of PSH. In particular, two City-owned properties that are part of the AHOS Initiative led by the Office of the CAO were the subject of many comments received: the Venice Dell Pacific site and the Thatcher Yard site, both in the Venice Community Plan area. The CAO has selected a developer to submit a proposal for each of these sites; however, no proposal has been finalized at this time. It is not clear the extent to which the proposed ordinance may apply to any projects proposed for those sites, or whether the proposed projects would qualify for the provisions of the ordinance.

The Venice Dell Pacific site (125 E. Venice Blvd.) is zoned for Open Space (OS), and therefore would not be eligible for the proposed ordinance as residential uses are not an allowed use in the OS Zone.

The Thatcher Yard site (3233 S. Thatcher Ave.) is zoned for Public Facilities (PF), and is adjacent to an R1 and C4 Zone. The proposed amendments to the PF Zone could facilitate the application of the uses and standards of the adjacent C4 Zone to this site, only if the proposal were for a Qualified PSH project as defined in the ordinance. However, the site is within the Coastal Zone and the Oxford Triangle Specific Plan area and thus would be subject to discretionary review in accordance with these requirements and appropriate environmental clearance.

However, Exhibit C to the Staff Report, the MND and the Addendum identify both of these properties as Round-One Properties. Exhibit C and similar pages in the environmental documents indicate that the City has an Exclusive Negotiating Agreement (ENA) with Hollywood Community Housing Corporation and Venice Community Housing for the Venice

Dell Pacific Site, despite the fact that it is zoned Open Space. Is the City planning to re-zone the site? Exhibit C indicates that the City has an Exclusive Negotiating Agreement (ENA) with Thomas Safran and Associates for the Thatcher Yard Site. What environmental documents were prepared prior to entering into the ENAs for these two sites? As noted in our October 30, 2017 comment letter, Section 16.05 B.2 of the City's Municipal Code specifies that any project requiring a coastal development permit is discretionary, thus triggering CEQA. As shown in **Attachment 3**, both of these sites are located in the Coastal Zone. Pursuant to Public Resources Code § 21003.1 and CEQA Guidelines §15004 environmental review should have been conducted prior to executing the ENAs. What environmental document will be prepared prior to approving any project on these two sites? The MND should identify those site that will be subject to further environmental review, the nature of that review and whether the environmental documents will be circulated to the public for review and comment.

3. COMMENTS ON THE ENVIRONMENTAL DOCUMENTS FOR THE PSH ORDINANCE

As previously noted in this comment letter, Channel Law and members of the public have been provided with insufficient time to review and comment on the environmental documents for the PSH Ordinance. Given the time constrains, we off these preliminary comments on the defects in the environmental documents.

3.1 Inadequate Project Description – Failure to Identify All Potential PSH City Owned Land

100-2

The MND needs to explain which Round One Properties (MND Table 5, MND pages 38-39) will be subject to separate environmental review, which are addressed in the MND, and which are considered exempt from environmental review with and without the PSH Ordinance. (See also comments in Section 2.1 above.) The MND needs to identify the development potential of the Round One Properties. The environmental document for the project needs to provide site-specific analysis for known project sites.

In terms of City-owned property and sites in the Public Facilities Zone (PF), the environmental documents identify only the seven Round One Properties, and indicates that: The CAO intends to continue to identify suitable City owned properties on an annual basis, which will the be included in Request for Proposals to the City's qualified list of developers."⁸ The MND can not be used as the environmental clearance for PSH projects unless they are more specifically identified in the MND; Figure 4 is insufficient.

The project description in the MND fails to disclose that the Ordinance creates a new CEQA exemption for PSH projects in two sections of the Ordinance, and that this new exemption is inconsistent with Public Resources Code (CEQA) Section 21159.21 and does not require compliance with Public Resources Code (PRC) Section 21159.23. PRC Section 21159.21 provides the criteria for qualifying for housing project exemptions⁹ and PRC Section 21159.23 provides for an exemption for low-income housing for residential housing consisting of 100 or fewer units.¹⁰ Pursuant to CEQA a low-income housing project would not qualify for an

⁸ Addendum, page 39.

⁹ See also CEQA Guidelines Section 15192.

¹⁰ See also CEQA Guidelines Section 15194.

exemption “if there is a reasonable possibility that the project would have a significant effect on the environment or the residents of the project due to unusual circumstances or due to the related or cumulative impacts of reasonably foreseeable projects in the vicinity of the project.”¹¹ Pursuant to PRC Section 21159.21, a low income housing project would not qualify for an exemption if it is inconsistent with any applicable general plan, specific plan or local coastal program; community-level environmental review has not been adopted or certified; existing utilities are not adequate to serve the project; the site is on a list of hazardous materials sites; the project would impact historical resources; or is in a hazards area.

In contrast, the Ordinance provides for an exemption for PSH projects, by adding the following language to Article 6.1 – Review of Development Projects, Section 16.05D – Exemptions,¹² via Section 4 of the Ordinance:

Section 4. Subdivision 8 of Subsection D of Section 16.05 of the Los Angeles Municipal Code is added to read as follows:

8. A Qualified Permanent Supportive Housing Project developed pursuant to Section 14.00 A.11 of this Code and containing no more than 120 units, or no more than 200 units if it is located in the Greater Downtown Housing Incentive Area.¹³

The Ordinance thus allows for exemption of PSH projects with a larger number of units than would be allowed under existing CEQA exemptions. This change to existing CEQA exemptions, to create a less restrictive exemption for PSH projects is a discretionary action subject to CEQA review, should be disclosed in the MND and analyzed in the environmental document for the PSH Ordinance.

3.2 Project Impacts

We offer the following limited comments on the discussion of potential project impacts, given the inadequate time provided for review and comment on the environmental documents for the PSH Ordinance.

Impact on Crime

In addressing whether it is appropriate to increase the size of the low-income housing (i.e. PSH) projects eligible for an exemption, the environmental document for the Ordinance should address the fact that the Minnesota Housing Finance Agency’s Research and Evaluation Unit in their review of housing studies found:¹⁴

100-3

¹¹ CEQA (Public Resources Code) 21159.23(c).

¹² Section 16.05D states: “Unless made discretionary by any other provision of law, the approval of any building permit for a development project which does not exceed the thresholds set forth in this subsection and Section 12.24U14 is ministerial and exempt from the requirements of the California Environmental Quality Act.

¹³ Page 9, Draft Ordinance 8/30/2017.

¹⁴ Discussion Paper, Impact of Affordable Housing on Communities and Households, Minnesota Housing Finance Agency, page 4.

Impact on Neighborhood Crime

Research on the relationship between affordable housing and crime identifies project scale as the most important factor in determining the impact on neighborhood crime rates. Multiple studies find that smaller projects (typically less than 50 units) have no impact on neighborhood crime, but that larger projects may result in increased crime. This finding was common across multiple types of affordable housing, including non-profit rental housing, public housing, and supportive housing.

Impact on Property Values

The MND should address the fact that there is evidence, that PSH facilities may lead to a decrease in property values when located in higher income areas. According to “The Impacts of Supportive Housing on Neighborhoods and Neighbors:

100-4

While the *average* relationship between this set of supportive housing facilities and proximate house prices was positive, not all site/neighborhood combinations in Denver experienced the same relationship. When we disaggregated our analysis to measure impacts for different common clusters of sites/neighborhoods, we found that the set of five supportive housing sites located in low-valued, heavily minority-occupied (typically majority Black-occupied) neighborhoods consistently evinced the positive price impacts noted above. By contrast, the site in the highest-value, overwhelmingly white-occupied neighborhood apparently had a *negative* effect on house prices, as did another (poorly maintained) site in a modestly valued, high-density core neighborhood having 24 percent of its population classified as Hispanic.¹⁵

...

Our central finding—that supportive housing generally has a positive impact on neighborhoods when done at a small scale, but that poorly managed properties can be deleterious to neighborhoods—implies that public policy would do well to encourage both public education and high-quality operation in the realm of supportive housing. Our findings also strongly suggest that the public sector pay strict attention to the ongoing operation, tenant management, and physical maintenance of supportive housing facilities.¹⁶

The environmental document should address the potential environmental consequences of changes in property values.

Increase in Water Demand

CEQA Guidelines Section 15155 requires the City to consult with the applicable water agency for any water-demand project, including residential development of more than 500 units,

100-5

¹⁵ “The Impacts of Supportive Housing on Neighborhoods and Neighbors”, The Urban Institute (October 1999), George Galster et al, page xii:

¹⁶ Ibid, page xiv:

as part of the preparation of the environmental document for the project (in this case the Ordinance). Given that the intent of the Ordinance is to increase the production of PSH, with a goal of at least an additional 2000 units over 10 years, as part of the preparation of the environmental document for the Ordinance, the City should have consulted with the applicable water agency to determine if the intended effects of the Ordinance were included in the most recently adopted urban water management plan and to prepare a water assessment approved at a regular or special meeting of that governing body.

Growth Inducing Impacts

Recent research has indicated the potential for the construction of PSH to induce in-migration of additional homeless into a Continuum of Care (CoC) area¹⁷ or inhibit out-migration of homeless. As explained by Corinth:

100-6

One potentially important factor that could affect estimates of associations between PSH and homelessness is migration. A CoC that expands its inventory may experience an inflow of homeless people seeking services or a reduced outflow of homeless people to other CoCs.¹⁸

Between 2007 and 2014, communities across the United States rapidly expanded the inventory of PSH beds for homeless individuals with disabling conditions. . . I find that each additional PSH bed was associated with between 0.04 and 0.12 fewer homeless people after one year. Causal effects identified on the basis of lagged funding decisions imply that one additional PSH bed reduces homeless counts by up to 0.10 people. Effect sizes of greater than 0.72 can be rejected at the 95% confidence level, ruling out the simple reasoning that adding one unit of housing reduces homelessness by one person. Relatively modest effects may be explained by some combination of poor targeting, differential exit rates into private housing from PSH relative to homelessness, incentives for remaining homeless, errors in homeless counts, and migration in response to expanded PSH. Indeed, PSH expansion in the rest of a state is associated with significant reductions in homeless counts within a community, consistent with homeless migration in response to PSH expansion.¹⁹

The environmental analysis for the proposed Ordinance should therefore address the growth-inducing impacts of the proposed Ordinance.

¹⁷ A Continuum of Care (CoC) is a regional or local planning body that coordinates housing and services funding for homeless families and individuals. There are 414 CoCs in the United States. The Los Angeles CoC covers the Los Angeles County area, but excludes the cities of Glendale, Pasadena and Long Beach.

¹⁸ Corinth, Kevin. "The Impact of Permanent Supportive Housing on Homeless Populations." *Journal of Housing Economics* 35 (2017) 69-84. Page 75. Available at: https://ac.els-cdn.com/S1051137715300474/1-s2.0-S1051137715300474-main.pdf?_tid=0cedc104-ba9c-11e7-a99d-00000aacb35f&acdnat=1509056685_fceb158ca8e69a34586fd1d9d46ba052

¹⁹ Corinth, Kevin. "The Impact of Permanent Supportive Housing on Homeless Populations." *Journal of Housing Economics* 35 (2017) 69-84. Page 80.

Cumulative Impacts

The PSH Ordinance is not the only ordinance currently under consideration by the City to address homelessness. The City is concurrently considering an Interim Motel Conversion Ordinance (CPC-2017-3409-CA; ENV-2017-3410-ND). Although the case numbers for the Motel Conversion Ordinance appear to indicate that a Negative Declaration has been prepared for the Motel Conversion Ordinance, the Negative Declaration does not appear to be available on the City's website. The environmental document for the PSH Ordinance should include the cumulative projects resulting from the Motel Conversion Ordinance and should address the potential cumulative impacts associated with the City's full Comprehensive Homeless Strategy.

100-7

School Infrastructure

The MND does not adequately analyze the impact of PSH projects, including the proposed project at Thatcher Yard, on schools. The proposed increases in density will create additional demand. Among other things, additional infrastructure may need to be constructed to accommodate the demand. Such reasonably foreseeable impacts should be disclosed, analyzed and mitigated.

100-8

Subterranean Fuel Storage Tanks

Many of the proposed locations where PSH projects will be constructed, including the proposed location at Thatcher Yard, contain (or previously contained) subterranean fuel storage tanks. Such tanks are known to create hazards that should be analyzed in the MND.

100-9

4. CONCLUSION

The City has not proceeded in the manner prescribe by law regarding the environmental documentation for the PSH Ordinance. The City must therefore take the following actions:

- Void the actions taken by the Planning Commission regarding the PSH Ordinance and the associated environmental documents;
- Prepare a single environmental document for the PSH Ordinance and circulate that document for public review in accordance with the requirements for projects of area-wide significance;
- Provide Notice of the Availability of the revised document to all those who have comment on the environmental documents or the PSH Ordinance, including Channel Law.

Thank you in advance for your thoughtful consideration of these issues of concern. I may be contacted at 310-982-1760 or at jamie.hall@channellawgroup.com if you have any questions, comments or concerns.

Sincerely,



Jamie T. Hall

Attachments To The
Channel Law Comments On The Environmental Documentation For, And The,
Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And
Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd
(APN 4238-024-900 To 911)
December 20, 2017

**ATTACHMENTS TO CHANNEL LAW LETTER DATED DECEMBER 20, 2017
REGARDING THE PERMANENT SUPPORTIVE HOUSING ORDINANCE
AND ASSOCIATED ENVIRONMENTAL DOCUMENTS**

Attachments:

1. Channel Law letter dated October 30, 2017 regarding: Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV- 2017-3137-EAF) and Notification of Non-Compliance with CEQA with Regard to the Permanent Supportive Housing Ordinance and Proposed Redevelopment of Venice Dell Pacific Site located at 125 E. Venice Blvd (APN 4238-024-900 to 911)
2. Planning Commission Letter of Determination Regarding the PSH Ordinance and Associated CEQA Documents and the Planning Commission Meeting Audio Links for the December 14, 2017 Hearing, See Item 12.
3. City of Los Angeles Parcel Profile Reports (ZIMAS Reports) For Two Parcels In the Coastal Zone.
4. Location of PSH Ordinance Eligible Parcels.
5. Notice of Intent to Adopt MND from City's Website
6. CEQANet, State Clearinghouse Records for SCAG's RTP/SCS EIR

Attachments To The Channel Law Comments On The Environmental Documentation For Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And Proposed Redevelopment Of Thatcher Yard Located at 3233 S. Thatcher Avenue (APN 4229-002-901)

Attachment 1

Channel Law letter dated October 30, 2017 regarding: Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV- 2017-3137-EAF) and Notification of Non-Compliance with CEQA with Regard to the Permanent Supportive Housing Ordinance and Proposed Redevelopment of Thatcher Yard located at 3233 S. Thatcher Avenue (APN 4229-002-901)

Channel Law Group, LLP

8200 Wilshire Blvd.
Suite 300
Beverly Hills, CA 90211

Phone: (310) 347-0050
Fax: (323) 723-3960
www.channellawgroup.com

JULIAN K. QUATTLEBAUM, III *
JAMIE T. HALL **
CHARLES J. McLURKIN

Writer's Direct Line: (310) 982-1760
jamie.hall@channellawgroup.com

*ALSO Admitted in Colorado
**ALSO Admitted in Texas

October 30, 2017

VIA ELECTRONIC MAIL

Los Angeles Planning Commission
Department of City Planning,
City Hall - Room 763,
200 North Spring Street,
Los Angeles CA 90012

Via email: cally.hardy@lacity.org

Re: Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137-EAF) and Notification of Non-Compliance with CEQA with Regard to the Permanent Supportive Housing Ordinance and Proposed Redevelopment of Thatcher Yard located at 3233 S. Thatcher Avenue (APN 4229-002-901)

Dear Planning Commissioners:

This firm represents Oxford Triangle Association with regard to the proposed development of the Thatcher Yard located at 3233 S. Thatcher Avenue as well as the City's proposed Permanent Supportive Housing Ordinance. The City released a Notice of a Public Hearing on the Permanent Supportive Housing Ordinance (proposed Ordinance). The Notice listed two meeting dates: September 25, 2017 and September 28, 2017 and indicated that last day to submit comments to staff was October 30, 2017. The Notice indicated that after October 30, 2017 comments should be addressed to the City Planning Commission, but did not provide the date by which such comments should be provided. The Notice also did not indicate when the City Planning Commission would consider the proposed Ordinance. In addition the Notice provides no information on California Environmental Quality Act (CEQA) document availability for the proposed Ordinance.

Permanent Supportive Housing is an Incompatible Land Use in Oxford Triangle

My client contends that the compatibility of Permanent Supportive Housing in areas of the City must be ascertained on a case-by-case basis. What may be appropriate in one part of the

City with certain conditions of approval and compliance with development standards may be entirely inappropriate in other areas of the City. My client strongly contends that Permanent Supportive Housing at the Thatcher Yard is incompatible with the existing environment and community. Moreover, such a development is inconsistent with the Specific Plan adopted for the Oxford Triangle. That being said, my client offers the following comments on the proposed Ordinance.

Permanent Supportive Housing Ordinance Lack of CEQA Document

The timeline provided in the presentation materials at the Staff Public Hearing of September 25, 2017 indicates that the CEQA document would be completed by the time the Draft Ordinance was released for public comment (see **Attachment 1**), yet it appears no CEQA document has been completed. Lack of a CEQA document inhibits the ability of the public to comment on, or fully understand, the potential impacts of the proposed Ordinance.

Given the project numbers assigned to the proposed Ordinance (CPC-2017-3136-CA; ENV-2017-3137-EAF) it appears only the City's Environmental Assessment Form (EAF) may have been completed to date for the Ordinance, and this document is not available on the City's website. An Environmental Assessment Form is not one of the three types of environmental documents specified in CEQA and the CEQA Guidelines. No action should be taken on the Ordinance until the appropriate CEQA document has been prepared and circulated for public review per the CEQA Guidelines.¹

Please contact us and provide information on the timeline for CEQA compliance and the type of CEQA document to be prepared. Indicate how participation in the CEQA process will be coordinated with the Ordinance review and consideration process. Please provide any notices or other information regarding this Ordinance to us at the address listed on our letterhead.

Inaccurate Project Description

The Frequently Asked Questions (and answers) attached to the Notice provides the following information:

Qualified PSH Projects would be allowed in zones that allow a multifamily residential use (RD zone and less restrictive).²

Per State law in California SB 2 (2007), PSH projects are required to be treated the same as any residential use in the same zone. This means that PSH projects can be built anywhere a multifamily residential building is allowed under the Zoning Code. The proposed ordinance does not change where PSH units are currently allowed in the city.³

This is misleading. Allowable uses in the Public Facilities (PF) zone currently are as follows (emphasis added):

¹ See for example CEQA Guidelines 15075, 15089 and 15090.

² Notice, page 1.

³ Notice, page 3.

B. Use. The following regulations shall apply to publicly owned land classified in the “PF” Public Facilities Zone. No building, structure or land shall be used and no building or structure shall be erected, moved onto a site, structurally altered, enlarged or maintained, except for the following uses:

1. Farming and nurseries, under power transmission rights-of-way. (Amended by Ord. No. 181,188, Eff. 7/18/10.)
2. Public parking facilities located under freeway rights-of-way.
3. Fire stations and police stations.
4. (Amended by Ord. No. 173,492, Eff. 10/10/00.) Government buildings, structures, offices and service facilities including maintenance yards, provided, however, that those uses identified in Section 12.24U21 shall require conditional use approval pursuant to that section.
5. Public libraries not located inside public parks.
6. Post offices and related facilities.
7. Public health facilities, including clinics and hospitals.
8. Public elementary and secondary schools.
9. Any joint public and private development uses permitted **in the most restrictive adjoining zones** if approved by the Director utilizing the procedures described in Section 16.05E to H. The phrase “adjoining zones” refers to the zones on properties abutting, across the street or alley from or having a common corner with the subject property. If there are two or more different adjoining zones, then **only the uses permitted by the most restrictive zone shall be permitted.**
10. (Amended by Ord. No. 174,132, Eff. 9/3/01.) Conditional uses as allowed pursuant to Section 12.24 U 21 and Section 12.24 W 49 of this Code when the location is approved pursuant to the provisions of the applicable section.⁴

The proposed Ordinance amends the Public Facilities (PF) Zone, to allow for automatic rezoning to allow for a qualified Permanent Supportive Housing Project as follows (emphasis added):

SEC. 12.04.09. “PF” PUBLIC FACILITIES ZONE.

9. Any joint public and private development uses permitted in the most restrictive adjoining zones if approved by the Director utilizing the procedures described in Section 16.05 E to H. The phrase “adjoining zones” refers to the zones on

⁴ Los Angeles Municipal Code, Chapter 1, Section 12.04.09 B.

properties abutting, across the street or alley from or having a common corner with the subject property. If there are two or more different adjoining zones, then only the uses permitted by the most restrictive zone shall be permitted. **If the joint public and private development is a Qualified Permanent Supportive Housing Project developed pursuant to Section 14.00 A.11 of this Code, the uses and standards permitted by the least restrictive zone within a 1,320 foot radius shall be permitted utilizing the procedures described therein.**

The ordinance thus allows for automatic rezoning of a PF zone consistent with **the least restrictive zone within a 1,320 foot radius** for a Permanent Supportive Housing (PSH) project. Under the Ordinance Qualified PSH Projects would be allowed in a zone that currently may not allow multifamily residential.

Please explain how the 1,320-foot radius figure was selected. Please indicate how much of the parcel with less restrictive zoning must be within the 1,320-foot radius for the PF zoned parcel to take on the less restrictive zoning.

Inadequate Notice - Failure to Disclose Creation of A New CEQA Exemption

CEQA applies to discretionary approvals.⁵ Section 16.05 B.2 of the City's Municipal Code (LAMC) defines a discretionary approval as including:

2. Discretionary Approval. (Amended by Ord. No. 184,827, Eff. 3/24/17.) An approval initiated by application of a property owner or representative related to the use of land including, but not limited to a:

- (a) zone change;
- (b) height district change;
- (h) coastal development permit;
- (i) development agreement;
- (k) density bonus greater than the minimums pursuant to Government Code Section 65915;
- (m) exception from a geographically specific plan;
- (o) public benefit projects; or
- (p) floor area deviation of less than 50,000 square feet pursuant to [14.5.7](#) of [Article 4.5](#) of the Los Angeles Municipal Code.

Currently PF zoning allows joint public and private development uses permitted **in the most restrictive adjoining zones** if approved by the Director utilizing the procedures described in **Section 16.05E to H**.

⁵ CEQA Guidelines 15002(i).

Section 16.05E(4) of the Planning and Zoning Code specifies the following:

4. The Director shall not approve or conditionally approve a site plan review for a development project unless an appropriate environmental review clearance has been prepared in accordance with the requirements of CEQA. (Amended by Ord. No. 185,052, Eff. 8/14/17.)

Please verify that this requirement would continue to apply to joint public and private development uses in the PF Zone and that they would continue to be subject to the requirement to complete environmental review pursuant to CEQA.

The Notice fails to disclose that the Ordinance creates a new CEQA exemption for PSH projects in two sections of the Ordinance, and that this new exemption is inconsistent with Public Resources Code (CEQA) Section 21159.21 and does not require compliance with Public Resources Code (PRC) Section 21159.23. PRC Section 21159.21 provides the criteria for qualifying for housing project exemptions⁶ and PRC Section 21159.23 provides for an exemption for low-income housing for residential housing consisting of 100 or fewer units.⁷ Pursuant to CEQA a low-income housing project would not qualify for an exemption “if there is a reasonable possibility that the project would have a significant effect on the environment or the residents of the project due to unusual circumstances or due to the related or cumulative impacts of reasonably foreseeable projects in the vicinity of the project.”⁸ Pursuant to PRC Section 21159.21, a low income housing project would not qualify for an exemption if it is inconsistent with any applicable general plan, specific plan or local coastal program; community-level environmental review has not been adopted or certified; existing utilities are not adequate to serve the project; the site is on a list of hazardous materials sites; the project would impact historical resources; or is in a hazards area.

In contrast, the Ordinance provides for an exemption for PSH projects, by adding the following language to Article 6.1 – Review of Development Projects, Section 16.05D – Exemptions,⁹ via Section 4 of the Ordinance:

Section 4. Subdivision 8 of Subsection D of Section 16.05 of the Los Angeles Municipal Code is added to read as follows:

8. A Qualified Permanent Supportive Housing Project developed pursuant to Section 14.00 A.11 of this Code and containing no more than 120 units, or no more than 200 units if it is located in the Greater Downtown Housing Incentive Area.¹⁰

The Ordinance thus allows for exemption of PSH projects with a larger number of units than would be allowed under existing CEQA exemptions. This change to existing CEQA

⁶ See also CEQA Guidelines Section 15192.

⁷ See also CEQA Guidelines Section 15194.

⁸ CEQA (Public Resources Code) 21159.23(c).

⁹ Section 16.05D states: “Unless made discretionary by any other provision of law, the approval of any building permit for a development project which does not exceed the thresholds set forth in this subsection and Section 12.24U14 is ministerial and exempt from the requirements of the California Environmental Quality Act.

¹⁰ Page 9, Draft Ordinance 8/30/2017.

exemptions, to create a less restrictive exemption for PSH projects is a discretionary action subject to CEQA review.

Please verify that under Section 4, PSH projects with more than 120 units outside of the Greater Downtown Housing Incentive Area would still be subject to CEQA. Please discuss how the threshold levels of 120 outside Downtown and 200 in Downtown were selected. If the Ordinance creates an exemption for a higher number of units than provided for under CEQA, it must be demonstrated that no significant impacts would occur.

In addressing whether it is appropriate to increase the size of the low-income housing (i.e. PSH) projects eligible for an exemption, the environmental document for the Ordinance should address the fact that the Minnesota Housing Finance Agency's Research and Evaluation Unit in their review of housing studies found:¹¹

Impact on Neighborhood Crime

Research on the relationship between affordable housing and crime identifies project scale as the most important factor in determining the impact on neighborhood crime rates. Multiple studies find that smaller projects (typically less than 50 units) have no impact on neighborhood crime, but that larger projects may result in increased crime. This finding was common across multiple types of affordable housing, including non-profit rental housing, public housing, and supportive housing.

Although Section 4's new CEQA exemption limits the size of PSH projects exempted from CEQA, Section 2 (11b) of the Ordinance also provides that:

The (Permanent Supportive Housing) application shall be approved by the Director of Planning through a ministerial Public Benefit process if the eligibility criteria and performance standards of this subsection are met.

As written, it is unclear whether Section 2(11b) would apply only to PSH projects "containing no more than 120 units, or no more than 200 units if it is located in the Greater Downtown Housing Incentive Area" per Section 4, or to all PSH projects. Do the size limits in Section 4 constitute "eligibility criteria"? This needs to be clarified. Please provide information on the correct reading of the two sections and the nature of limitations on PSH projects that would be exempted from CEQA under the Ordinance. Pursuant to PRC Section 21159.23, no exemption should every be granted if there is a reasonable possibility that the project would have a significant effect on the environment or the residents of the project due to unusual circumstances or due to the related or cumulative impacts of reasonably foreseeable projects in the vicinity of the project.

In addition to increasing the size of a low income housing project exempt from CEQA, as written, the Ordinance allows for automatic rezoning for Permanent Supportive Housing and deems the approval of any such housing project a ministerial act, thus exempting it from CEQA analysis, even though PSH projects are likely to fall within the definition of a discretionary approval pursuant to LAMC Section 16.05 B.2(a). The Notice fails to disclose this important aspect of the proposed Ordinance.

¹¹ Discussion Paper, Impact of Affordable Housing on Communities and Households, Minnesota Housing Finance Agency, page 4.

The City is thus appears to be considering approval of an Ordinance that increases the size of low income housing project eligible for an exemption and provides for a new automatic rezoning process for PSH projects in the PF Zone without conducting the required CEQA review, for either the Ordinance or requiring CEQA review at the project level. This is unacceptable and is contrary to CEQA. The City is required to comply with CEQA prior to consideration of the Ordinance. Failure to do so deprives decision-makers and the public of important information regarding both the details and implications of the Ordinance and its potential environmental impacts.

Inadequate Notice - Inadequate Project Description

Number and Location of PSH Developments - No information is provided in the Notice, or the non-existent CEQA document regarding the number and likely location of parcels zoned PF that may be automatically rezoned under the Ordinance to provide for Permanent Supportive Housing (PSH). This information is necessary in order to understand the details and implications of the Ordinance and its potential environmental impacts.

In addition, little information is provided on the likely locations of the Permanent Supportive Housing that the City seeks to have constructed in other zones throughout the City. This information is necessary in order to understand the details and implications of the Ordinance and its potential environmental impacts.

The Notice fails to disclose that the City has already issued a Request for Qualifications/Proposals (RFP) for the Affordable Housing Opportunity Sites.¹² The RFP identifies eight potential sites for permanent supportive housing and other types of affordable housing on City-owned land. Are there any other sites within the City anticipated to be used for Permanent Supportive Housing? Please provide information on potential sites as part of the environmental review of the Ordinance.

The following table summarized the information provided about those sites in the RFP:

SITES FOR PERMANENT SUPPORTIVE HOUSING AND OTHER TYPES OF AFFORDABLE HOUSING ON CITY-OWNED LAND IDENTIFIED IN CITY'S RFP			
LOT	PROPERTY IS ZONED	PARCEL SIZE IS APPROXIMATELY	NOTES
Lincoln Heights DOT Lot Number 697 2332-2340 N. Workman Street APN: 5204-016-901	[Q]C4-1XL-CDO RAS3-1VL-CDO	6,600 s.f.	One of five non-contiguous lots located behind North Broadway commercial storefronts. If a development strategy incorporates all of the Lincoln Heights DOT lots, replacement parking for all of the lots must be

¹² Submission deadline: September 15, 2016. Available at: <http://cao.lacity.org/AHOSRFQ.PDF>

SITES FOR PERMANENT SUPPORTIVE HOUSING AND OTHER TYPES OF AFFORDABLE HOUSING ON CITY-OWNED LAND IDENTIFIED IN CITY'S RFP			
LOT	PROPERTY IS ZONED	PARCEL SIZE IS APPROXIMATELY	NOTES
			included.
Lincoln Heights DOT Lot Number 658 216-224 S. Avenue 24 APN: 5204-005-901	PF-1-CD0 RAS3-1VL-CDO	19,379 s.f.	One of five non-contiguous lots located behind North Broadway commercial storefronts. Replacement public parking does not need to be assumed in the development submission for a single Lincoln Heights DOT lot, though it may be incorporated as part of the eventual project.
Lincoln Heights DOT Lot Lot Number 659 2331-2337 N. Workman Street and 2332-2338 N. Daly APN: 5204-011-903	PF-1-CD0 RAS3-1VL-CDO	37,200 s.f.	One of five non-contiguous lots located behind North Broadway commercial storefronts.
Lincoln Heights DOT Lot Lot Number 661 2416-2422 N. Workman Street APN: 5204-015-901	PF-1-CD0 RAS3-1VL-CDO	16,502 s.f.	One of five non-contiguous lots located behind North Broadway commercial storefronts.
Lincoln Heights DOT Lot Lot Number 660 154 -164 S. Avenue 24 APN: 5204-004-901	PF-1-CD0 RAS3-1VL-CDO	20,295 s.f.	One of five non-contiguous lots located behind North Broadway commercial storefronts.
Hillside Parcel 11681 W. Foothill Blvd, Sylmar APN: 2530-008-901	(T)RD2-1	132,095 s.f.	
Imperial Lot 283 W. Imperial Highway APN: 6074-024-900	C2-1	17,385 s.f.	
Thatcher Yard 3233 S. Thatcher Ave	(Q) PF-1XL	93,347 s.f.	A Coastal Development Permit from the City of

SITES FOR PERMANENT SUPPORTIVE HOUSING AND OTHER TYPES OF AFFORDABLE HOUSING ON CITY-OWNED LAND IDENTIFIED IN CITY'S RFP			
LOT	PROPERTY IS ZONED	PARCEL SIZE IS APPROXIMATELY	NOTES
APN: 4229-002-901	RD1.5		Los Angeles will be required, and Coastal Commission approval may be required on appeal.
Old West L.A. Animal Shelter 11950 Missouri Ave APN: 4259-020-900	PF-1-XL and M2-1 R3	32,642 s.f.	
Old Fire Station #5 6621 W. Manchester Ave APN: 4112-029-900	R1-1 R3	19,507 s.f.	Improved with an abandoned fire station.
Venice Dell Pacific Site 125 E Venice Blvd. APN: 4238-024-900 to 911	OS-1SL-O R3	122.171 s.f.	Developments must comply with the Venice Specific Plan. A Coastal Development Permit from the City of Los Angeles will be required, and approval from the California Coastal Commission will also be required.
Old Fire Station #53 438 N. Mesa Street APN: 7449-009-900	R2-1X	8,990 s.f.	The property is improved with an abandoned fire station.
Source: http://cao.lacity.org/AHOSRFQ.PDF			

Please provide information on the number of units that could potentially be developed on each of these sites under the Ordinance with an explanation of how the number was calculated and Ordinance provisions were applied.

According to the RFT, two of the sites, Thatcher Yard and the Venice Dell Pacific Site, require a Coastal Development Permit. Under Section 16.05 B.2 of the LAMC, preparation of an environmental document is required for this type of “discretionary” permit. However, proposed Section 2(11b) of the Ordinance would exempt the eight sites from environmental review. Pursuant to CEQA Guidelines Section 15268(d):

Where a project involves an approval that contains elements of both a ministerial action and a discretionary action, the project will be deemed to be discretionary and will be subject to the requirements of CEQA.

At a minimum, project level environmental review will be required for a PSH project on either the Thatcher Yard or Venice Dell Pacific Site. The Ordinance should be amended to require compliance with CEQA Guidelines Section 15268(d).

Concession and Incentives - Increased Density, Height etc. - Section 2, 11 – Permanent Supportive Housing (d – Zoning Compliance) states that (emphasis added):

(1) Minimum Lot Area per Dwelling Unit or Guest Room. In zones where multiple dwelling uses are permitted (R3 and less restrictive), the number of allowable dwelling units or guest rooms shall not be subject to the otherwise maximum allowable residential density under any applicable zoning ordinance and/or specific plan. In the RD1.5 Zone, the minimum lot area per dwelling unit or guest room shall be 500 square feet. **All applicable standards pertaining to height and floor area under any applicable zoning ordinance and/or specific plan or overlay shall apply.**

However, Section 2, 11 – Permanent Supportive Housing (e - Additional Concessions or Incentives) states (emphasis added):

(d) Zoning Compliance. A Qualified Permanent Supportive Housing Project meeting the requirements in Paragraph (c) and the performance standards in Paragraph (g) must comply with all objective requirements in any applicable zoning code, specific plan or overlay district regulations **except**:

Section 2,11(d) then provides for a PSH project to obtain up to four concessions or incentives, from a list that includes: decreased yard/setback requirements; increased lot coverage limits; increased floor area ratio; increase height; decreased open space, averaging floor area ratio; parking or open space across two or more contiguous parcels.

Section 2,11(d)'s statement that "All applicable standards pertaining to height and floor area under any applicable zoning ordinance and/or specific plan or overlay shall apply," appears contradicted by Section 2,11(e). Please explain how this apparent contradiction would be resolved by providing examples of PSH projects in several zones, as they would look under existing zoning, as compared to under the Ordinance. It is important for the environmental document for the Ordinance to address consistency of the Ordinance with existing area plans and design guidelines.

Inadequate Requirements for the Provision Of Supportive Services

Although the Ordinance requires that PSH projects record a covenant acceptable to the Housing and Community Investment Department (HCIDLA) that reserves and maintains the number of dwelling units designated as restricted affordable for at least 55 years from the issuance of the Certificate of Occupancy, it does not appear that the Ordinance similarly requires the provision of supportive services on an on-going basis for the life of the project, or provides a mechanism to ensure that supportive services are being provided consistently over the life of the project and that they are adequate for the needs of a PSH project's target population. In addition, the Ordinance does not establish minimum required levels of support services to be provided at each PSH.

Whereas PSH projects are generally not associated with an increase in crime and a decrease in property values¹³, the same is not true for shelters or public housing projects that do not provide supportive services for the target populations specified in Section 2, 11(a)(2) – Target Population of the Ordinance, or for poorly managed or maintained facilities.¹⁴ The nature and quality of the supportive services are important to ensuring surrounding neighborhoods will not experience an increase in crime or decrease in property values.

Issues to Address in the Environmental Analysis of the Proposed Ordinance

In addition to addressing the impact on the Ordinance on consistency with existing area plans and regulations, as well as the other CEQA Checklist issue areas, the environmental document for the Ordinance should address:

Growth Inducing Impacts - Recent research has indicated the potential for the construction of PSH to induce in-migration of additional homeless into a Continuum of Care (CoC) area¹⁵ or inhibit out-migration of homeless. As explained by Corinth:

One potentially important factor that could affect estimates of associations between PSH and homelessness is migration. A CoC that expands its inventory may experience an inflow of homeless people seeking services or a reduced outflow of homeless people to other CoCs.¹⁶

Between 2007 and 2014, communities across the United States rapidly expanded the inventory of PSH beds for homeless individuals with disabling conditions. . . I find that each additional PSH bed was associated with between 0.04 and 0.12 fewer homeless people after one year. Causal effects identified on the basis of lagged funding decisions imply that one additional PSH bed reduces homeless counts by up to 0.10 people. Effect sizes of greater than 0.72 can be rejected at the

¹³ There is some evidence, however, that PSH facilities may lead to a decrease in property values when located in higher income areas. According to “The Impacts of Supportive Housing on Neighborhoods and Neighbors, The Urban Institute (October 1999), George Galster et al, page xii:

While the *average* relationship between this set of supportive housing facilities and proximate house prices was positive, not all site/neighborhood combinations in Denver experienced the same relationship. When we disaggregated our analysis to measure impacts for different common clusters of sites/neighborhoods, we found that the set of five supportive housing sites located in low-valued, heavily minority-occupied (typically majority Black-occupied) neighborhoods consistently evinced the positive price impacts noted above. By contrast, the site in the highest-value, overwhelmingly white-occupied neighborhood apparently had a *negative* effect on house prices, as did another (poorly maintained) site in a modestly valued, high-density core neighborhood having 24 percent of its population classified as Hispanic.

¹⁴ Ibid, page xiv:

Our central finding—that supportive housing generally has a positive impact on neighborhoods when done at a small scale, but that poorly managed properties can be deleterious to neighborhoods—implies that public policy would do well to encourage both public education and high-quality operation in the realm of supportive housing. Our findings also strongly suggest that the public sector pay strict attention to the ongoing operation, tenant management, and physical maintenance of supportive housing facilities.

¹⁵ A Continuum of Care (CoC) is a regional or local planning body that coordinates housing and services funding for homeless families and individuals. There are 414 CoCs in the United States. The Los Angeles CoC covers the Los Angeles County area, but excludes the cities of Glendale, Pasadena and Long Beach.

¹⁶ Corinth, Kevin. “The Impact of Permanent Supportive Housing on Homeless Populations.” *Journal of Housing Economics* 35 (2017) 69-84. Page 75. Available at: https://ac.els-cdn.com/S1051137715300474/1-s2.0-S1051137715300474-main.pdf?_tid=0cedc104-ba9c-11e7-a99d-00000aacb35f&acdnat=1509056685_fceb158ca8e69a34586fd1d9d46ba052

95% confidence level, ruling out the simple reasoning that adding one unit of housing reduces homelessness by one person. Relatively modest effects may be explained by some combination of poor targeting, differential exit rates into private housing from PSH relative to homelessness, incentives for remaining homeless, errors in homeless counts, and migration in response to expanded PSH. Indeed, PSH expansion in the rest of a state is associated with significant reductions in homeless counts within a community, consistent with homeless migration in response to PSH expansion.¹⁷

The environmental analysis for the proposed Ordinance should therefore address the growth-inducing impacts of the proposed Ordinance.

Cumulative Impacts – The PSH Ordinance is not the only ordinance currently under consideration by the City to address homelessness. The City is concurrently considering an Interim Motel Conversion Ordinance (CPC-2017-3409-CA; ENV-2017-3410-ND). Although the case numbers for the Motel Conversion appear to indicate that a Negative Declaration has been prepared for the Motel Conversion Ordinance, the Negative Declaration does not appear to be available on the City’s website. The environmental document for the PSH Ordinance should include the cumulative projects resulting from the Motel Conversion Ordinance and should address the potential cumulative impacts associated with the City’s full Comprehensive Homeless Strategy.

Increase in Water Demand - According to page 1 of the Background and Frequently Asked Questions portion of the Notice:

According to the City’s Comprehensive Homeless Strategy, a total of 1,000 PSH units need to be constructed annually to house the City’s homeless population – a significant increase from the current annual supply of 300 units. To help meet these goals, the Los Angeles electorate adopted Measure HHH in November 2016, a voter initiative that will create \$1.2 billion in new funding over the next decade to construct PSH units. The voters also adopted Measure H in March 2017, a County-wide measure that will provide ongoing funding to support rent subsidies and services for PSH, among other homeless services.

It thus appears the City is seeking to increase the production of PSH by 700 units per year. CEQA Guidelines Section 15155 requires the City to consult with the applicable water agency for any water-demand project, including residential development of more than 500 units, as part of the preparation of the environmental document for the project (in this case the Ordinance). Given that the intent of the Ordinance is to increase the production of PSH, with a goal of at least an additional 700 units per year, as part of the preparation of the environmental document for the Ordinance, the City should consult with the applicable water agency to determine if the intended effects of the Ordinance were included in the most recently adopted urban water management plan and to prepare a water assessment approved at a regular or special meeting of that governing body.

¹⁷ Corinth, Kevin. “The Impact of Permanent Supportive Housing on Homeless Populations.” *Journal of Housing Economics* 35 (2017) 69-84. Page 80.

The Ordinance Needs to Be Amended

The Ordinance needs to be amended to:

- Remove the new CEQA exemption for PSH projects; instead the existing CEQA low-income housing exemption should be applied.
- Include language in the Ordinance to make clear that pursuant to CEQA Guidelines Section 15268(d) where a PSH project “involves an approval that contains elements of both a ministerial action and a discretionary action, the project will be deemed to be discretionary and will be subject to the requirements of CEQA.”
- Allow for automatic rezoning of only those parcels addressed in the environmental document for the proposed Ordinance, or specifically addressed in the environmental document for the applicable area plan.
- Add requirements for provision of an appropriate level of supportive services to be maintained over the life of individual PSH projects.

Conclusion

Thank you in advance for your thoughtful consideration of these issues of concern. I may be contacted at 310-982-1760 or at jamie.hall@channellawgroup.com if you have any questions, comments or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jamie T. Hall', written in a cursive style.

Jamie T. Hall

ATTACHMENTS:

1. Page showing CEQA Timeline presented at City’s informational meeting on the PSH Ordinance

cc: Councilman Mike Bonin
City Attorney Mike Feuer
Members of the Los Angeles City Council

Project Timeline

	Preparation of CEQA Document		Public Hearings	
	Initial Outreach	Public Comment Period		
Project Launch	Identify Draft Ordinance Concepts	Release Draft Ordinance	City Planning Commission	City Council Adoption
Summer 2016	Fall 2016 – Spring 2017	Summer 2017	Fall 2017	Winter 2017-18

October 30, 2017

*Deadline to submit public comment to
cally.hardy@lacity.org*



Attachments To The Channel Law Comments On The Environmental Documentation
For Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137)
And Proposed Redevelopment Of Thatcher Yard Located at 3233 S. Thatcher Avenue
(APN 4229-002-901)

Attachment 2

**Planning Commission Letter of Determination Regarding the PSH
Ordinance and Associated CEQA Documents and the Planning
Commission Meeting Audio Links for the December 14, 2017 Hearing,
See Item 12.**



LOS ANGELES CITY PLANNING COMMISSION

200 North Spring Street, Room 532, Los Angeles, California, 90012-4801, (213) 978-1300
www.planning.lacity.org

LETTER OF DETERMINATION

MAILING DATE: DEC 19 2017

Case No.: CPC-2017-3136-CA
CEQA: ENV-2017-3137-MND
SCAG 2016-2040 RTP/SCS PEIR (SCH No. 2015031035)

Council Districts: All

Plan Areas: All

Project Site: Citywide

Applicant: City of Los Angeles
Representative: Cally Hardy, Planning Assistant

At its meeting of **December 14, 2017**, the Los Angeles City Planning Commission took the actions below in conjunction with the approval of the proposed ordinance:

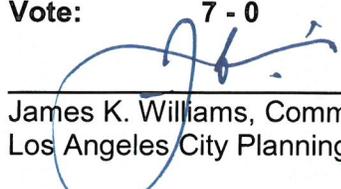
An ordinance amending Sections 12.03, 12.04.09, 14.00, and 16.05 of the Los Angeles Municipal Code establishing regulations to facilitate the production of Permanent Supportive Housing.

1. **Found** pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including Mitigated Negative Declaration No. ENV-2017-3137-MND (Mitigated Negative Declaration), and all comments received, with imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; **Found** that the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; **Found** the mitigation measures have been made enforceable conditions on the project; and adopt the Mitigated Negative Declaration; and **Adopted** the Mitigated Negative Declaration and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;
2. **Approve** and **recommend** that the City Council **find**, based on their independent judgement, after consideration of the whole of the administrative record, including the SCAG 2016-2040 RTP/SCS PEIR (SCH No. 2015031035), certified on April 7, 2016 (EIR) and the Addendum prepared for the PSH Ordinance (Addendum), the project was assessed in the EIR and pursuant to the CEQA Guidelines, Sections 15162 and 15164 and the Addendum that no major revisions to the EIR are required and no subsequent EIR, or negative declaration is required for approval of the project;
3. **Adopted** the staff report as the Commission report on the subject;
4. **Approved** and **recommended** that the City Council **adopt** the proposed ordinance, as amended by the Commission, subject to review by the City Attorney as to form and legality; and
5. **Adopted** and **recommended** that the City Council **adopt** the attached Findings.

The vote proceeded as follows:

Moved: Ambroz
Second: Khorsand
Ayes: Choe, Dake Wilson, Millman, Padilla Campos, Perlman
Absent: Mitchell, Mack

Vote: 7 - 0



James K. Williams, Commission Executive Assistant II
Los Angeles City Planning Commission

Effective Date/Appeals: The decision of the Los Angeles City Planning Commission is final and not appealable.

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

Attachments: Ordinance, Findings

c: Ken Bernstein, Principal Planner
Arthi Varma, Principal City Planner
Claire Bowin, Senior City Planner
Matthew Glesne, City Planner
Cally Hardy, Planning Assistant

Información en Español acerca de esta junta puede ser obtenida Llamando al (213) 978-1300

COMMISSION MEETING AUDIO

CITY PLANNING COMMISSION
REGULAR MEETING AGENDA
THURSDAY, DECEMBER 14, 2017 after 8:30 a.m.
LOS ANGELES CITY HALL, COUNCIL CHAMBERS ROOM 340
200 NORTH SPRING STREET, LOS ANGELES, CALIFORNIA 90012

CLICK ON THE [BLUE](#) LINKS BELOW TO LISTEN TO AUDIO FROM THE MEETING

**TO REQUEST A COPY ON COMPACT DISC,
PLEASE CONTACT THE DEPARTMENT OF CITY PLANNING PUBLICATIONS AT (213) 978-1255**

1. [**DIRECTOR'S REPORT**](#)

- Update on City Planning Commission Status Reports and Active Assignments
- Legal actions and issues update
- Other Items of Interest

2. [**COMMISSION BUSINESS**](#)

- Advance Calendar
- Commission Requests
- Minutes of Meeting – November 9, 2017; November 16, 2017

3. [**NEIGHBORHOOD COUNCIL PRESENTATION**](#)

Presentation by Neighborhood Council representatives on any Neighborhood Council resolution, or community impact statement filed with the City Clerk, which relates to any agenda item listed or being considered on this agenda. The Neighborhood Council representative shall provide the Board or Commission with a copy of the Neighborhood Council's resolution or community impact statement. THESE PRESENTATIONS WILL BE TAKEN AT THE TIME THE AGENDA ITEM IS CALLED FOR CONSIDERATION.

4. [**GENERAL PUBLIC COMMENT**](#)

The Commission shall provide an opportunity in open meetings for the public to address it **on non-agenda items**, for a cumulative total of up to thirty (30) minutes, on items of interest to the public that are within the subject matter jurisdiction of the Commission.

PERSONS WISHING TO SPEAK MUST SUBMIT A SPEAKER'S REQUEST FORM. ALL REQUESTS TO ADDRESS THE COMMISSION ON **NON-AGENDA ITEMS** AND ITEMS OF INTEREST TO THE PUBLIC THAT ARE WITHIN THE JURISDICTION OF THE COMMISSION MUST BE SUBMITTED PRIOR TO THE COMMENCEMENT OF THE PUBLIC COMMENT PERIOD.

5. **RECONSIDERATIONS**

- 5a. **MOTIONS TO RECONSIDER** - The Commission may make a motion to reconsider a Commission Action on any agenda items from its previous meeting, consistently with the Commission Rule 8.3, provided the Commission retains jurisdiction over the matter.
- 5b. **MERITS OF ANY ITEM THE COMMISSION HAS VOTED TO RECONSIDER** – If a majority of the Commission has approved a motion to reconsider a Commission Action, the Commission may address the merits of the original Commission Action.

6. **CONSENT CALENDAR (None)**

Consent Calendar items are considered to be not controversial and will be treated as one agenda item. The Consent Calendar will be enacted by one motion. There will be no separate discussion of these items unless the item is removed from the Consent Calendar, in which event the item will be considered as time allows on the regular agenda.

- 6a. **CPC-2014-4942-ZC-HD-DB-SPR**
CEQA: ENV-2014-4943-MND
Plan Area: Wilshire

Council District: 1 - Cedillo
Last Day to Act: 12-19-17

PUBLIC HEARING – Completed July 24, 2017

PROJECT SITE: 2501 – 2515 West Olympic Boulevard;
980 – 992 South Arapahoe Street;
981 South Hoover Street

PROPOSED PROJECT:

Construction of a new seven-story, mixed-use development consisting of 173 residential units and 36,990 square feet of commercial uses with a total of 262 on-site vehicle parking spaces (201 spaces for residential uses, 61 spaces for commercial uses) located within one ground floor parking level and two subterranean parking levels, on a Project Site that consists of nine (9) contiguous lots totaling 51,949 square feet in size, and is currently vacant. The building will measure approximately 92 feet in height and contain approximately 183,190 square feet of floor area. As part of this application, the Department of City Planning has initiated a Zone Change and Height District Change from C2-2 to (T)(Q)C2-1 as a technical correction to a recorded mapping error which will create consistency between the Zone designation and the General Plan Land Use designation for the C2 zoned lots.

REQUESTED ACTIONS:

1. Pursuant to CEQA Guidelines Section 15074(b), consideration of the whole of the administrative record, including the Mitigated Negative Declaration, No. ENV-2014-4943-MND (“Mitigated Negative Declaration”), Errata dated November 17, 2017, all comments received, the imposition of mitigation measures and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;

ACTIONS INITIATED BY THE DIRECTOR OF PLANNING:

2. Pursuant to Los Angeles Municipal Code (LAMC) Section 12.32 F, a Zone Change and Height District Change from C2-2 to (T)(Q)C2-1;

ACTIONS REQUESTED BY THE APPLICANT:

3. Pursuant to Section 12.22 A.25(g)(2) a 33 percent Density Bonus for a project reserving 15 percent of the base dwelling units, or 20 units, for Very Low Income Households, in conjunction with Parking Option 1 and the following three (3) On-Menu Incentives:

REQUESTED ACTIONS:

1. Pursuant to CEQA Guidelines, Section 15332, an Exemption from CEQA, and that there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies; and
2. Pursuant to Section 12.22 A.25(g)(3) of the Los Angeles Municipal Code, a 32.5 percent Density Bonus for a project totaling 26 residential dwelling units reserving 10 percent, or two (2) units, for Very Low Income Households, and utilizing parking option 1, with one Off-Menu Incentive to allow a maximum Floor Area Ratio (FAR) of 2.01:1 in lieu of a 1:1, otherwise permitted pursuant to Ordinance No. 173,606 and Section 15.A of the Colorado Boulevard Specific Plan.

Applicant: Imad Boukai, General Procurement
Representative: Heather Lee

Staff: Azeen Khanmalek, City Planning Associate
azeen.khanmalek@lacity.org
(213) 978-1336

****THE FOLLOWING ITEMS WILL BE CONSIDERED AFTER 12:00 PM****

12. [CPC-2017-3136-CA](#)
CEQA: ENV-2017-3137-MND
SCAG 2016-2040 RTP/SCS PEIR (SCH No. 2015031035)
Plan Areas: All

Council Districts: All
Last Day to Act: N/A

PUBLIC HEARING – Completed September 25, 2017 and September 28, 2017

PROJECT AREA: Citywide

PROPOSED ORDINANCE:

An ordinance amending Sections 12.03, 12.04.09, 14.00, and 16.05 of the Los Angeles Municipal Code establishing regulations to facilitate the production of Permanent Supportive Housing.

RECOMMENDED ACTIONS:

1. Pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including Mitigated Negative Declaration No. ENV-2017-3137-MND (Mitigated Negative Declaration), and all comments received, with imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; find the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; find the mitigation measures have been made enforceable conditions on the project; and adopt the Mitigated Negative Declaration;
2. Approve and recommend that the City Council find, based on their independent judgement, after consideration of the whole of the administrative record, including the SCAG 2016-2040 RTP/ SCS PEIR (SCH No. 2015031035), certified on April 7, 2016 (EIR) and the Addendum prepared for the PSH Ordinance (Addendum), the project was assessed in the EIR and pursuant to the CEQA Guidelines, Sections 15162 and 15164 and the Addendum that no major revisions to the EIR are required and no subsequent EIR, or negative declaration is required for approval of the project;
3. Approve and recommend that the City Council adopt the proposed ordinance;
4. Adopt the Staff Report as the Commission Report on the subject; and
5. Adopt the Findings.

Applicant: City of Los Angeles

Staff: Cally Hardy, Planning Assistant
cally.hardy@lacity.org
(213) 978-1643

13. [CPC-2017-3409-CA](#)
CEQA: ENV-2017-4476-CE,
ENV-2017-3410-ND
Plan Areas: All

Council Districts: All
Last Day to Act: N/A

PUBLIC HEARINGS – Completed September 25, 2017 and September 28, 2017

PROJECT AREA: Citywide

PROPOSED ORDINANCE:

An ordinance amending Sections 12.03, 14.00 and 151.02 of the Los Angeles Municipal Code establishing regulations to facilitate the use of existing hotels and motels for Supportive Housing and/or Transitional Housing.

RECOMMENDED ACTIONS:

1. Determine, based on the whole of the administrative record, that the proposed ordinance is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15301, and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines Section 15300.2 applies;
2. Approve and recommend that the City Council find, pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including the Negative Declaration, No. ENV-2017-3410-ND (“Negative Declaration”), and all comments received, there is no substantial evidence that the project will have a significant effect on the environment; find the Negative Declaration reflects the independent judgment and analysis of the City; and adopt the Negative Declaration;
3. Approve and recommend that the City Council adopt the proposed ordinance;
4. Adopt the Staff Report as the Commission Report on the subject; and
5. Adopt the Findings.

Applicant: City of Los Angeles

Staff: Cally Hardy, Planning Assistant
cally.hardy@lacity.org
(213) 978-1643

14. [CPC-2017-4546-CA](#)
CEQA: ENV-2017-3361-SE
Plan Areas: All

Council Districts: All
Last Day to Act: N/A

PUBLIC HEARING REQUIRED

PROJECT AREA: Citywide

PROPOSED ORDINANCE:

An ordinance enacting restrictions on commercial advertising of cannabis, cannabis products, commercial cannabis activity, or businesses engaged in any commercial cannabis activity on signs.

RECOMMENDED ACTIONS:

1. Determine that based on the whole of the administrative record, the project is exempt from CEQA pursuant to California Business and Professions Code Section 26055(h) on the basis that the project will adopt ordinances, rules and/or regulations that will require discretionary review under CEQA to approve licenses to engage in commercial cannabis activity in the City of Los Angeles;
2. Approve and Recommend that the City Council adopt the proposed Ordinance;

3. Adopt the Staff Report as the Commission's Report on the subject; and
4. Adopt the Findings.

Applicant: City of Los Angeles

Staff: Niall Huffman, City Planning Associate
niall.huffman@lacity.org
(213) 978-3405

The next scheduled regular meeting of the City Planning Commission will be held on:

Thursday, December 21, 2017

Van Nuys City Hall
Council Chamber, 2nd Floor
14410 Sylvan Street
Van Nuys, CA 91401

An Equal Employment Opportunity/Affirmative Action Employer

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate. The meeting facility and its parking are wheelchair accessible. Translation services, sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services must be requested **7 days prior to the meeting** by calling the Planning Commission Secretariat at (213) 978-1300 or by email at CPC@lacity.org.

Attachments To The
Channel Law Comments On The Environmental Documentation For, And The,
Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And
Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd
(APN 4238-024-900 To 911)
December 20, 2017

Attachment 3
City of Los Angeles Parcel Profile Reports (ZIMAS Reports) For Two
Parcels In the Coastal Zone.



City of Los Angeles Department of City Planning

12/18/2017 PARCEL PROFILE REPORT

PROPERTY ADDRESSES

125 E VENICE BLVD
125 E SOUTH VENICE BLVD

ZIP CODES

90291

RECENT ACTIVITY

DIR-2008-4703-DI

CASE NUMBERS

CPC-2014-1456-SP
CPC-2005-8252-CA
CPC-2000-4046-CA
CPC-1998-119
CPC-1995-148-GPC-ZC
CPC-1987-648-ICO
CPC-1986-824-GPC
CPC-1984-226-SP
CPC-1972-24385
CPC-17630
ORD-175694
ORD-175693
ORD-172897
ORD-172019
ORD-170998-SA10
ORD-168999
ORD-164844-SA2190
ORD-145252
ORD-130336
DIR-2014-2824-DI
ZA-1992-484-PAD
ENV-2014-1458-EIR
ENV-2005-8253-ND
ENV-2004-2691-CE
ENV-2002-6836-SP
ENV-2001-846-ND
ED-73-307-ZC
AFF-36536

Address/Legal Information

PIN Number	106-5A145 436
Lot/Parcel Area (Calculated)	1,337.0 (sq ft)
Thomas Brothers Grid	PAGE 671 - GRID H6
Assessor Parcel No. (APN)	4238024900
Tract	SHORT LINE BEACH SUBDIVISION NO. 1
Map Reference	M B 2-59
Block	9
Lot	36
Arb (Lot Cut Reference)	1
Map Sheet	106-5A145

Jurisdictional Information

Community Plan Area	Venice
Area Planning Commission	West Los Angeles
Neighborhood Council	Venice
Council District	CD 11 - Mike Bonin
Census Tract #	2739.02
LADBS District Office	West Los Angeles

Planning and Zoning Information

Special Notes	None
Zoning	OS-1XL-O
Zoning Information (ZI)	ZI-2471 Coastal Zone
	ZI-2452 Transit Priority Area in the City of Los Angeles
	ZI-2406 Director's Interpretation of the Venice SP for Small Lot Subdivisio
General Plan Land Use	Open Space
General Plan Note(s)	Yes
Hillside Area (Zoning Code)	No
Specific Plan Area	Los Angeles Coastal Transportation Corridor
Subarea	None
Specific Plan Area	Venice Coastal Zone
Subarea	Venice Canals
Special Land Use / Zoning	None
Design Review Board	No
Historic Preservation Review	No
Historic Preservation Overlay Zone	None
Other Historic Designations	None
Other Historic Survey Information	None
Mills Act Contract	None
CDO: Community Design Overlay	None
CPIO: Community Plan Imp. Overlay	None
Subarea	None
CUGU: Clean Up-Green Up	None
NSO: Neighborhood Stabilization Overlay	No
POD: Pedestrian Oriented Districts	None
SN: Sign District	No
Streetscape	No
Adaptive Reuse Incentive Area	None

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(*) - APN Area is provided "as is" from the Los Angeles County's Public Works, Flood Control, Benefit Assessment.

Ellis Act Property	No
Rent Stabilization Ordinance (RSO)	No
Transit Oriented Communities (TOC)	Tier 1
CRA - Community Redevelopment Agency	None
Central City Parking	No
Downtown Parking	No
Building Line	None
500 Ft School Zone	No
500 Ft Park Zone	No

Assessor Information

Assessor Parcel No. (APN)	4238024900
APN Area (Co. Public Works)*	0.635 (ac)
Use Code	2700 - Commercial - Parking Lot (Commercial Use Property) - Lots - Patron or Employee - One Story
Assessed Land Val.	\$230,543
Assessed Improvement Val.	\$0
Last Owner Change	12/12/1960
Last Sale Amount	\$0
Tax Rate Area	67
Deed Ref No. (City Clerk)	1-792
Building 1	No data for building 1
Building 2	No data for building 2
Building 3	No data for building 3
Building 4	No data for building 4
Building 5	No data for building 5

Additional Information

Airport Hazard	None
Coastal Zone	Coastal Zone Commission Authority Dual Jurisdictional Coastal Zone
Farmland	Area Not Mapped
Urban Agriculture Incentive Zone	YES
Very High Fire Hazard Severity Zone	No
Fire District No. 1	No
Flood Zone	None
Watercourse	No
Hazardous Waste / Border Zone Properties	No
Methane Hazard Site	Methane Zone
High Wind Velocity Areas	No
Special Grading Area (BOE Basic Grid Map A-13372)	No
Oil Wells	None

Seismic Hazards

Active Fault Near-Source Zone	
Nearest Fault (Distance in km)	5.5738776
Nearest Fault (Name)	Santa Monica Fault
Region	Transverse Ranges and Los Angeles Basin
Fault Type	B
Slip Rate (mm/year)	1.00000000
Slip Geometry	Left Lateral - Reverse - Oblique
Slip Type	Moderately / Poorly Constrained
Down Dip Width (km)	13.00000000
Rupture Top	0.00000000
Rupture Bottom	13.00000000
Dip Angle (degrees)	-75.00000000
Maximum Magnitude	6.60000000

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 (*) - APN Area is provided "as is" from the Los Angeles County's Public Works, Flood Control, Benefit Assessment.

Alquist-Priolo Fault Zone	No
Landslide	No
Liquefaction	Yes
Preliminary Fault Rupture Study Area	No
Tsunami Inundation Zone	Yes

Economic Development Areas

Business Improvement District	VENICE BEACH
Promise Zone	None
Renewal Community	No
Revitalization Zone	None
State Enterprise Zone	None
Targeted Neighborhood Initiative	None

Public Safety

Police Information

Bureau	West
Division / Station	Pacific
Reporting District	1441

Fire Information

Bureau	West
Batallion	4
District / Fire Station	63
Red Flag Restricted Parking	No

CASE SUMMARIES

Note: Information for case summaries is retrieved from the Planning Department's Plan Case Tracking System (PCTS) database.

Case Number:	CPC-2014-1456-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	SPECIFIC PLAN AMENDMENT
Case Number:	CPC-2005-8252-CA
Required Action(s):	CA-CODE AMENDMENT
Project Descriptions(s):	AN ORDINANCE ESTABLISHING PERMANENT REGULATIONS IMPLEMENTING THE MELLO ACT IN THE COASTAL ZONE.
Case Number:	CPC-2000-4046-CA
Required Action(s):	CA-CODE AMENDMENT
Project Descriptions(s):	
Case Number:	CPC-1998-119
Required Action(s):	Data Not Available
Project Descriptions(s):	
Case Number:	CPC-1995-148-GPC-ZC
Required Action(s):	GPC-GENERAL PLAN/ZONING CONSISTENCY (AB283) ZC-ZONE CHANGE
Project Descriptions(s):	Data Not Available
Case Number:	CPC-1987-648-ICO
Required Action(s):	ICO-INTERIM CONTROL ORDINANCE
Project Descriptions(s):	INTERIM CONTROL ORDINANCE FOR THE ENTIRE VENICE COASTAL ZONE WHICH WILL TEMPORARILY PERMIT ONLY BUILDING DEVELOPMENT WHICH IS IN CONFORMANCE WITH REGULATIONS SUBSTANTIALLY BASED ON THE CALIFORNIA COASTAL COMMISSIONS INTERPRETIVE GUIDELINES FOR THE AREA
Case Number:	CPC-1986-824-GPC
Required Action(s):	GPC-GENERAL PLAN/ZONING CONSISTENCY (AB283)
Project Descriptions(s):	
Case Number:	CPC-1984-226-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	Data Not Available
Case Number:	CPC-1972-24385
Required Action(s):	Data Not Available
Project Descriptions(s):	
Case Number:	DIR-2014-2824-DI
Required Action(s):	DI-DIRECTOR OF PLANNING INTERPRETATION
Project Descriptions(s):	DIRECTOR'S INTERPRETATION OF A SPECIFIC PLAN PURSUANT TO LAMC SECTION 11.5.7.H. THE INTERPRETATION SHALL ONLY BE APPLICABLE TO THE VENICE COASTAL SPECIFIC PLAN.
Case Number:	ZA-1992-484-PAD
Required Action(s):	PAD-PLAN APPROVAL ONLY FOR A DEEMED-TO-BE-APPROVED CU
Project Descriptions(s):	THE CITY PROPOSES TO MAINTAIN THE SITE AS A PUBLIC MUNICIPAL PARKING LOT.
Case Number:	ENV-2014-1458-EIR
Required Action(s):	EIR-ENVIRONMENTAL IMPACT REPORT
Project Descriptions(s):	ENVIRONMENTAL IMPACT REPORT
Case Number:	ENV-2005-8253-ND
Required Action(s):	ND-NEGATIVE DECLARATION
Project Descriptions(s):	AN ORDINANCE ESTABLISHING PERMANENT REGULATIONS IMPLEMENTING THE MELLO ACT IN THE COASTAL ZONE.
Case Number:	ENV-2004-2691-CE
Required Action(s):	CE-CATEGORICAL EXEMPTION
Project Descriptions(s):	SMALL LOT/TOWNHOME ORDINANCE
Case Number:	ENV-2002-6836-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	VENICE COASTAL SPECIFIC PLAN AMENDMENT prepared and adopted by the City Planning Dept. in accordance with the Coastal Act provisions and guidelines.
Case Number:	ENV-2001-846-ND
Required Action(s):	ND-NEGATIVE DECLARATION
Project Descriptions(s):	
Case Number:	ED-73-307-ZC

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(*) - APN Area is provided "as is" from the Los Angeles County's Public Works, Flood Control, Benefit Assessment.

Required Action(s): ZC-ZONE CHANGE

Project Descriptions(s): Data Not Available

DATA NOT AVAILABLE

CPC-17630

ORD-175694

ORD-175693

ORD-172897

ORD-172019

ORD-170998-SA10

ORD-168999

ORD-164844-SA2190

ORD-145252

ORD-130336

AFF-36536



0.02 Miles
80 Feet

Address: 125 E VENICE BLVD

Tract: SHORT LINE BEACH
SUBDIVISION NO. 1

Zoning: OS-1XL-O

APN: 4238024900

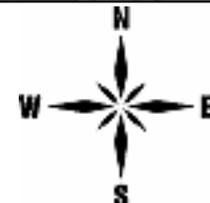
Block: 9

General Plan: Open Space

PIN #: 106-5A145 436

Lot: 36

Arb: 1



LEGEND

GENERALIZED ZONING

-  OS, GW
-  A, RA
-  RE, RS, R1, RU, RZ, RW1
-  R2, RD, RMP, RW2, R3, RAS, R4, R5
-  CR, C1, C1.5, C2, C4, C5, CW, ADP, LASED, CEC, USC, PVSP, PPSP
-  CM, MR, WC, CCS, UV, UI, UC, M1, M2, LAX, M3, SL
-  P, PB
-  PF

GENERAL PLAN LAND USE

LAND USE

RESIDENTIAL

-  Minimum Residential
-  Very Low / Very Low I Residential
-  Very Low II Residential
-  Low / Low I Residential
-  Low II Residential
-  Low Medium / Low Medium I Residential
-  Low Medium II Residential
-  Medium Residential
-  High Medium Residential
-  High Density Residential
-  Very High Medium Residential

COMMERCIAL

-  Limited Commercial
-  Limited Commercial - Mixed Medium Residential
-  Highway Oriented Commercial
-  Highway Oriented and Limited Commercial
-  Highway Oriented Commercial - Mixed Medium Residential
-  Neighborhood Office Commercial
-  Community Commercial
-  Community Commercial - Mixed High Residential
-  Regional Center Commercial

FRAMEWORK

COMMERCIAL

-  Neighborhood Commercial
-  General Commercial
-  Community Commercial
-  Regional Mixed Commercial

INDUSTRIAL

-  Commercial Manufacturing
-  Limited Manufacturing
-  Light Manufacturing
-  Heavy Manufacturing
-  Hybrid Industrial

PARKING

-  Parking Buffer

PORT OF LOS ANGELES

-  General / Bulk Cargo - Non Hazardous (Industrial / Commercial)
-  General / Bulk Cargo - Hazard
-  Commercial Fishing
-  Recreation and Commercial
-  Intermodal Container Transfer Facility Site

LOS ANGELES INTERNATIONAL AIRPORT

-  Airport Landside / Airport Landside Support
-  Airport Airside
-  LAX Airport Northside

OPEN SPACE / PUBLIC FACILITIES

-  Open Space
-  Public / Open Space
-  Public / Quasi-Public Open Space
-  Other Public Open Space
-  Public Facilities

INDUSTRIAL

-  Limited Industrial
-  Light Industrial

CIRCULATION

STREET

-  Arterial Mountain Road
-  Collector Scenic Street
-  Collector Street
-  Collector Street (Hillside)
-  Collector Street (Modified)
-  Collector Street (Proposed)
-  Country Road
-  Divided Major Highway II
-  Divided Secondary Scenic Highway
-  Local Scenic Road
-  Local Street
-  Major Highway (Modified)
-  Major Highway I
-  Major Highway II
-  Major Highway II (Modified)

-  Major Scenic Highway
-  Major Scenic Highway (Modified)
-  Major Scenic Highway II
-  Mountain Collector Street
-  Park Road
-  Parkway
-  Principal Major Highway
-  Private Street
-  Scenic Divided Major Highway II
-  Scenic Park
-  Scenic Parkway
-  Secondary Highway
-  Secondary Highway (Modified)
-  Secondary Scenic Highway
-  Special Collector Street
-  Super Major Highway

FREEWAYS

-  Freeway
-  Interchange
-  On-Ramp / Off- Ramp
-  Railroad
-  Scenic Freeway Highway

MISC. LINES

-  Airport Boundary
-  Bus Line
-  Coastal Zone Boundary
-  Coastline Boundary
-  Collector Scenic Street (Proposed)
-  Commercial Areas
-  Commercial Center
-  Community Redevelopment Project Area
-  Country Road
-  DWP Power Lines
-  Desirable Open Space
-  Detached Single Family House
-  Endangered Ridgeline
-  Equestrian and/or Hiking Trail
-  Hiking Trail
-  Historical Preservation
-  Horsekeeping Area
-  Local Street
-  MSA Desirable Open Space
-  Major Scenic Controls
-  Multi-Purpose Trail
-  Natural Resource Reserve
-  Park Road
-  Park Road (Proposed)
-  Quasi-Public
-  Rapid Transit Line
-  Residential Planned Development
-  Scenic Highway (Obsolete)
-  Secondary Scenic Controls
-  Secondary Scenic Highway (Proposed)
-  Site Boundary
-  Southern California Edison Power
-  Special Study Area
-  Specific Plan Area
-  Stagecoach Line
-  Wildlife Corridor

POINTS OF INTEREST

 Alternative Youth Hostel (Proposed)	 Horticultural Center	 Public Elementary School
 Animal Shelter	 Hospital	 Public Elementary School (Proposed)
 Area Library	 Hospital (Proposed)	 Public Golf Course
 Area Library (Proposed)	HW House of Worship	 Public Golf Course (Proposed)
 Bridge	e Important Ecological Area	 Public Housing
 Campground	 Important Ecological Area (Proposed)	 Public Housing (Proposed Expansion)
 Campground (Proposed)	 Interpretive Center (Proposed)	 Public Junior High School
 Cemetery	 Junior College	 Public Junior High School (Proposed)
HW Church	 MTA / Metrolink Station	 Public Middle School
 City Hall	 MTA Station	 Public Senior High School
 Community Center	 MTA Stop	 Public Senior High School (Proposed)
 Community Library	MWD MWD Headquarters	 Pumping Station
 Community Library (Proposed Expansion)	 Maintenance Yard	 Pumping Station (Proposed)
 Community Library (Proposed)	 Municipal Office Building	 Refuse Collection Center
 Community Park	P Municipal Parking lot	 Regional Library
 Community Park (Proposed Expansion)	 Neighborhood Park	 Regional Library (Proposed Expansion)
 Community Park (Proposed)	 Neighborhood Park (Proposed Expansion)	 Regional Library (Proposed)
 Community Transit Center	 Neighborhood Park (Proposed)	 Regional Park
 Convalescent Hospital	 Oil Collection Center	 Regional Park (Proposed)
 Correctional Facility	 Parking Enforcement	RPD Residential Plan Development
 Cultural / Historic Site (Proposed)	 Police Headquarters	 Scenic View Site
 Cultural / Historical Site	 Police Station	 Scenic View Site (Proposed)
 Cultural Arts Center	 Police Station (Proposed Expansion)	 School District Headquarters
DMV DMV Office	 Police Station (Proposed)	 School Unspecified Loc/Type (Proposed)
DWP DWP	 Police Training site	 Skill Center
 DWP Pumping Station	PO Post Office	 Social Services
 Equestrian Center	 Power Distribution Station	 Special Feature
 Fire Department Headquarters	 Power Distribution Station (Proposed)	 Special Recreation (a)
 Fire Station	 Power Receiving Station	 Special School Facility
 Fire Station (Proposed Expansion)	 Power Receiving Station (Proposed)	 Special School Facility (Proposed)
 Fire Station (Proposed)	C Private College	 Steam Plant
 Fire Supply & Maintenance	E Private Elementary School	 Surface Mining
 Fire Training Site	 Private Golf Course	 Trail & Assembly Area
 Fireboat Station	 Private Golf Course (Proposed)	 Trail & Assembly Area (Proposed)
 Health Center / Medical Facility	JH Private Junior High School	UTL Utility Yard
 Helistop	PS Private Pre-School	 Water Tank Reservoir
 Historic Monument	 Private Recreation & Cultural Facility	 Wildlife Migration Corridor
 Historical / Cultural Monument	SH Private Senior High School	 Wildlife Preserve Gate
 Horsekeeping Area	SF Private Special School	
 Horsekeeping Area (Proposed)	 Public Elementary (Proposed Expansion)	

SCHOOLS/PARKS WITH 500 FT. BUFFER

-  Existing School/Park Site
-  Planned School/Park Site
-  Inside 500 Ft. Buffer

- | | | |
|---|--|--|
|  Aquatic Facilities |  Other Facilities |  Opportunity School |
|  Beaches |  Park / Recreation Centers |  Charter School |
|  Child Care Centers |  Parks |  Elementary School |
|  Golf Course |  Performing / Visual Arts Centers |  Span School |
|  Historic Sites |  Recreation Centers |  Special Education School |
|  Horticulture/Gardens |  Senior Citizen Centers |  High School |
|  Skate Parks | |  Middle School |

TRANSIT ORIENTED COMMUNITIES (TOC)

- | | |
|--|--|
|  Tier 1 |  Tier 3 |
|  Tier 2 |  Tier 4 |

Note: TOC Tier designation and map layers are for reference purposes only. Eligible projects shall demonstrate compliance with Tier eligibility standards prior to the issuance of any permits or approvals. As transit service changes, eligible TOC Incentive Areas will be updated.

COASTAL ZONE

-  Coastal Zone Commission Authority
-  Calvo Exclusion Area
-  Not in Coastal Zone
-  Dual Jurisdictional Coastal Zone

WAIVER OF DEDICATION OR IMPROVEMENT

-  Waiver of Dedication or Improvement (WDI)
-  Public Work Approval (PWA)

LAMC SECTION 85.02 (VEHICLE DWELLING)

-  No vehicle dwelling anytime
-  No vehicle dwelling overnight between 9:00 PM - 6:00 AM. Must comply with all posted parking restrictions
-  Vehicle dwelling allowed. Must comply with all posted parking restrictions

OTHER SYMBOLS

- | | | |
|---|---|--|
|  Lot Line |  Airport Hazard Zone |  Flood Zone |
|  Tract Line |  Census Tract |  Hazardous Waste |
|  Lot Cut |  Coastal Zone |  High Wind Zone |
|  Easement |  Council District |  Hillside Grading |
|  Zone Boundary |  LADBS District Office |  Historic Preservation Overlay Zone |
|  Building Line |  Downtown Parking |  Specific Plan Area |
|  Lot Split |  Fault Zone |  Very High Fire Hazard Severity Zone |
|  Community Driveway |  Fire District No. 1 |  Oil Wells |
|  Lot Ties |  Tract Map | |
|  Building Outlines 2014 |  Parcel Map | |
| Building Outlines 2008 | | |



City of Los Angeles Department of City Planning

12/18/2017 PARCEL PROFILE REPORT

PROPERTY ADDRESSES

200 E VENICE BLVD
200 E SOUTH VENICE BLVD

ZIP CODES

90291

RECENT ACTIVITY

DIR-2008-4703-DI
ENV-2008-1044

CASE NUMBERS

CPC-2014-1456-SP
CPC-2005-8252-CA
CPC-2000-4046-CA
CPC-1998-119
CPC-1987-648-ICO
CPC-1986-824-GPC
CPC-1984-226-SP
CPC-17630
ORD-175694
ORD-175693
ORD-172897
ORD-172019
ORD-168999
ORD-164844-SA3070
ORD-130336
DIR-2014-2824-DI
ZA-2008-1045-ZAA
ZA-1984-628-SM
ENV-2014-1458-EIR
ENV-2008-1044-CE
ENV-2005-8253-ND
ENV-2004-2691-CE
ENV-2002-6836-SP
ENV-2001-846-ND

Address/Legal Information

PIN Number	106-5A145 440
Lot/Parcel Area (Calculated)	2,991.8 (sq ft)
Thomas Brothers Grid	PAGE 671 - GRID H6
Assessor Parcel No. (APN)	4227003001
Tract	SHORT LINE BEACH SUBDIVISION NO. 1
Map Reference	M B 2-59
Block	13
Lot	1
Arb (Lot Cut Reference)	None
Map Sheet	106-5A145

Jurisdictional Information

Community Plan Area	Venice
Area Planning Commission	West Los Angeles
Neighborhood Council	Venice
Council District	CD 11 - Mike Bonin
Census Tract #	2739.02
LADBS District Office	West Los Angeles

Planning and Zoning Information

Special Notes	None
Zoning	R3-1-O
Zoning Information (ZI)	ZI-2406 Director's Interpretation of the Venice SP for Small Lot Subdivisio
	ZI-2471 Coastal Zone
	ZI-2452 Transit Priority Area in the City of Los Angeles
General Plan Land Use	Medium Residential
General Plan Note(s)	Yes
Hillside Area (Zoning Code)	No
Specific Plan Area	Los Angeles Coastal Transportation Corridor
Subarea	None
Specific Plan Area	Venice Coastal Zone
Subarea	Venice Canals
Special Land Use / Zoning	None
Design Review Board	No
Historic Preservation Review	No
Historic Preservation Overlay Zone	None
Other Historic Designations	None
Other Historic Survey Information	None
Mills Act Contract	None
CDO: Community Design Overlay	None
CPIO: Community Plan Imp. Overlay	None
Subarea	None
CUGU: Clean Up-Green Up	None
NSO: Neighborhood Stabilization Overlay	No
POD: Pedestrian Oriented Districts	None
SN: Sign District	No
Streetscape	No
Adaptive Reuse Incentive Area	None

Rent Stabilization Ordinance (RSO)	No
Transit Oriented Communities (TOC)	Tier 1
CRA - Community Redevelopment Agency	None
Central City Parking	No
Downtown Parking	No
Building Line	None
500 Ft School Zone	No
500 Ft Park Zone	No

Assessor Information

Assessor Parcel No. (APN)	4227003001
APN Area (Co. Public Works)*	0.069 (ac)
Use Code	0101 - Residential - Single Family Residence - Pool
Assessed Land Val.	\$2,246,847
Assessed Improvement Val.	\$1,758,692
Last Owner Change	10/13/2015
Last Sale Amount	\$3,850,038
Tax Rate Area	67
Deed Ref No. (City Clerk)	996965
	996964
	67795
	409258
	2404751
	2404750
	1341496
	1289208
	1258991
Building 1	
Year Built	1987
Building Class	D10A
Number of Units	1
Number of Bedrooms	2
Number of Bathrooms	3
Building Square Footage	3,735.0 (sq ft)
Building 2	No data for building 2
Building 3	No data for building 3
Building 4	No data for building 4
Building 5	No data for building 5

Additional Information

Airport Hazard	None
Coastal Zone	Coastal Zone Commission Authority
	Dual Jurisdictional Coastal Zone
Farmland	Area Not Mapped
Urban Agriculture Incentive Zone	YES
Very High Fire Hazard Severity Zone	No
Fire District No. 1	No
Flood Zone	None
Watercourse	No
Hazardous Waste / Border Zone Properties	No
Methane Hazard Site	Methane Zone
High Wind Velocity Areas	No
Special Grading Area (BOE Basic Grid Map A-13372)	No
Oil Wells	None

Seismic Hazards

Nearest Fault (Distance in km)	5.58546
Nearest Fault (Name)	Santa Monica Fault
Region	Transverse Ranges and Los Angeles Basin
Fault Type	B
Slip Rate (mm/year)	1.00000000
Slip Geometry	Left Lateral - Reverse - Oblique
Slip Type	Moderately / Poorly Constrained
Down Dip Width (km)	13.00000000
Rupture Top	0.00000000
Rupture Bottom	13.00000000
Dip Angle (degrees)	-75.00000000
Maximum Magnitude	6.60000000
Alquist-Priolo Fault Zone	No
Landslide	No
Liquefaction	Yes
Preliminary Fault Rupture Study Area	No
Tsunami Inundation Zone	Yes

Economic Development Areas

Business Improvement District	None
Promise Zone	None
Renewal Community	No
Revitalization Zone	None
State Enterprise Zone	None
Targeted Neighborhood Initiative	None

Public Safety

Police Information

Bureau	West
Division / Station	Pacific
Reporting District	1441

Fire Information

Bureau	West
Batallion	4
District / Fire Station	63
Red Flag Restricted Parking	No

Note: Information for case summaries is retrieved from the Planning Department's Plan Case Tracking System (PCTS) database.

Case Number:	CPC-2014-1456-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	SPECIFIC PLAN AMENDMENT
Case Number:	CPC-2005-8252-CA
Required Action(s):	CA-CODE AMENDMENT
Project Descriptions(s):	AN ORDINANCE ESTABLISHING PERMANENT REGULATIONS IMPLEMENTING THE MELLO ACT IN THE COASTAL ZONE.
Case Number:	CPC-2000-4046-CA
Required Action(s):	CA-CODE AMENDMENT
Project Descriptions(s):	
Case Number:	CPC-1998-119
Required Action(s):	Data Not Available
Project Descriptions(s):	
Case Number:	CPC-1987-648-ICO
Required Action(s):	ICO-INTERIM CONTROL ORDINANCE
Project Descriptions(s):	INTERIM CONTROL ORDINANCE FOR THE ENTIRE VENICE COASTAL ZONE WHICH WILL TEMPORARILY PERMIT ONLY BUILDING DEVELOPMENT WHICH IS IN CONFORMANCE WITH REGULATIONS SUBSTANTIALLY BASED ON THE CALIFORNIA COASTAL COMMISSIONS INTERPRETIVE GUIDELINES FOR THE AREA
Case Number:	CPC-1986-824-GPC
Required Action(s):	GPC-GENERAL PLAN/ZONING CONSISTENCY (AB283)
Project Descriptions(s):	
Case Number:	CPC-1984-226-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	Data Not Available
Case Number:	DIR-2014-2824-DI
Required Action(s):	DI-DIRECTOR OF PLANNING INTERPRETATION
Project Descriptions(s):	DIRECTOR'S INTERPRETATION OF A SPECIFIC PLAN PURSUANT TO LAMC SECTION 11.5.7.H. THE INTERPRETATION SHALL ONLY BE APPLICABLE TO THE VENICE COASTAL SPECIFIC PLAN.
Case Number:	ZA-2008-1045-ZAA
Required Action(s):	ZAA-AREA, HEIGHT, YARD, AND BLDG LINE ADJMNTS GT 20% (SLIGHT MODIFICATIONS)
Project Descriptions(s):	AS PER 12.28 - ZONING ADMINISTRATOR'S ADJUSTMENT TO PERMIT A REDUCED FRONT YARD SETBACK OF 5' IN LIEU OF THE MINIMUM 15' REQUIRED (PER SECTION 12.10 C.1).
Case Number:	ZA-1984-628-SM
Required Action(s):	SM-SLIGHT MODIFICATIONS
Project Descriptions(s):	
Case Number:	ENV-2014-1458-EIR
Required Action(s):	EIR-ENVIRONMENTAL IMPACT REPORT
Project Descriptions(s):	ENVIRONMENTAL IMPACT REPORT
Case Number:	ENV-2008-1044-CE
Required Action(s):	CE-CATEGORICAL EXEMPTION
Project Descriptions(s):	AS PER 12.28 - ZONING ADMINISTRATOR'S ADJUSTMENT TO PERMIT A REDUCED FRONT YARD SETBACK OF 5' IN LIEU OF THE MINIMUM 15' REQUIRED (PER SECTION 12.10 C.1).
Case Number:	ENV-2005-8253-ND
Required Action(s):	ND-NEGATIVE DECLARATION
Project Descriptions(s):	AN ORDINANCE ESTABLISHING PERMANENT REGULATIONS IMPLEMENTING THE MELLO ACT IN THE COASTAL ZONE.
Case Number:	ENV-2004-2691-CE
Required Action(s):	CE-CATEGORICAL EXEMPTION
Project Descriptions(s):	SMALL LOT/TOWNHOME ORDINANCE
Case Number:	ENV-2002-6836-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	VENICE COASTAL SPECIFIC PLAN AMENDMENT prepared and adopted by the City Planning Dept. in accordance with the Coastal Act provisions and guidelines.
Case Number:	ENV-2001-846-ND
Required Action(s):	ND-NEGATIVE DECLARATION
Project Descriptions(s):	

DATA NOT AVAILABLE

CPC-17630

ORD-175694

ORD-175693

ORD-172897

ORD-172019

ORD-168999

ORD-164844-SA3070

ORD-130336

12/18/2017

Generalized Zoning

IMAS PUBLIC



Zoning: R3-1-O
General Plan: Medium Residential

Tract: SHORT LINE BEACH
SUBDIVISION NO. 1
Block: 13
Lot: 1
Arb: None

Address: 200 E VENICE BLVD
APN: 4227003001
N #: 106-5A145 440

LEGEND

GENERALIZED ZONING

- OS, GW
- A, RA
- RE, RS, R1, RU, RZ, RW1
- R2, RD, RMP, RW2, R3, RAS, R4, R5
- CR, C1, C1.5, C2, C4, C5, CW, ADP, LASED, CEC, USC, PVSP, PPSP
- CM, MR, WC, CCS, UV, UI, UC, M1, M2, LAX, M3, SL
- P, PB
- PF

GENERAL PLAN LAND USE

LAND USE

RESIDENTIAL

- Minimum Residential
- Very Low / Very Low I Residential
- Very Low II Residential
- Low / Low I Residential
- Low II Residential
- Low Medium / Low Medium I Residential
- Low Medium II Residential
- Medium Residential
- High Medium Residential
- High Density Residential
- Very High Medium Residential

COMMERCIAL

- Limited Commercial
- Limited Commercial - Mixed Medium Residential
- Highway Oriented Commercial
- Highway Oriented and Limited Commercial
- Highway Oriented Commercial - Mixed Medium Residential
- Neighborhood Office Commercial
- Community Commercial
- Community Commercial - Mixed High Residential
- Regional Center Commercial

FRAMEWORK

COMMERCIAL

- Neighborhood Commercial
- General Commercial
- Community Commercial
- Regional Mixed Commercial

INDUSTRIAL

- Commercial Manufacturing
- Limited Manufacturing
- Light Manufacturing
- Heavy Manufacturing
- Hybrid Industrial

PARKING

- Parking Buffer

PORT OF LOS ANGELES

- General / Bulk Cargo - Non Hazardous (Industrial / Commercial)
- General / Bulk Cargo - Hazard
- Commercial Fishing
- Recreation and Commercial
- Intermodal Container Transfer Facility Site

LOS ANGELES INTERNATIONAL AIRPORT

- Airport Landside / Airport Landside Support
- Airport Airside
- LAX Airport Northside

OPEN SPACE / PUBLIC FACILITIES

- Open Space
- Public / Open Space
- Public / Quasi-Public Open Space
- Other Public Open Space
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INDUSTRIAL

- Limited Industrial
- Light Industrial

CIRCULATION

STREET

-  Arterial Mountain Road
-  Collector Scenic Street
-  Collector Street
-  Collector Street (Hillside)
-  Collector Street (Modified)
-  Collector Street (Proposed)
-  Country Road
-  Divided Major Highway II
-  Divided Secondary Scenic Highway
-  Local Scenic Road
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FREEWAYS

-  Freeway
-  Interchange
-  On-Ramp / Off- Ramp
-  Railroad
-  Scenic Freeway Highway

MISC. LINES

-  Airport Boundary
-  Bus Line
-  Coastal Zone Boundary
-  Coastline Boundary
-  Collector Scenic Street (Proposed)
-  Commercial Areas
-  Commercial Center
-  Community Redevelopment Project Area
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-  Site Boundary
-  Southern California Edison Power
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POINTS OF INTEREST

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 Area Library	 Hospital (Proposed)	 Public Golf Course
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 Historical / Cultural Monument	SH Private Senior High School	 Wildlife Preserve Gate
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 Horsekeeping Area (Proposed)	 Public Elementary (Proposed Expansion)	

SCHOOLS/PARKS WITH 500 FT. BUFFER

-  Existing School/Park Site
-  Planned School/Park Site
-  Inside 500 Ft. Buffer

- | | | |
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|  Aquatic Facilities |  Other Facilities |  Opportunity School |
|  Beaches |  Park / Recreation Centers |  Charter School |
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|  Horticulture/Gardens |  Senior Citizen Centers |  High School |
|  Skate Parks | |  Middle School |

TRANSIT ORIENTED COMMUNITIES (TOC)

- | | |
|--|--|
|  Tier 1 |  Tier 3 |
|  Tier 2 |  Tier 4 |

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COASTAL ZONE

-  Coastal Zone Commission Authority
-  Calvo Exclusion Area
-  Not in Coastal Zone
-  Dual Jurisdictional Coastal Zone

WAIVER OF DEDICATION OR IMPROVEMENT

-  Waiver of Dedication or Improvement (WDI)
-  Public Work Approval (PWA)

LAMC SECTION 85.02 (VEHICLE DWELLING)

-  No vehicle dwelling anytime
-  No vehicle dwelling overnight between 9:00 PM - 6:00 AM. Must comply with all posted parking restrictions
-  Vehicle dwelling allowed. Must comply with all posted parking restrictions

OTHER SYMBOLS

- | | | |
|---|---|--|
|  Lot Line |  Airport Hazard Zone |  Flood Zone |
|  Tract Line |  Census Tract |  Hazardous Waste |
|  Lot Cut |  Coastal Zone |  High Wind Zone |
|  Easement |  Council District |  Hillside Grading |
|  Zone Boundary |  LADBS District Office |  Historic Preservation Overlay Zone |
|  Building Line |  Downtown Parking |  Specific Plan Area |
|  Lot Split |  Fault Zone |  Very High Fire Hazard Severity Zone |
|  Community Driveway |  Fire District No. 1 |  Oil Wells |
|  Lot Ties |  Tract Map | |
|  Building Outlines 2014 |  Parcel Map | |
|  Building Outlines 2008 | | |



City of Los Angeles Department of City Planning

12/18/2017 PARCEL PROFILE REPORT

PROPERTY ADDRESSES

3233 S THATCHER AVE
3311 S THATCHER AVE
3321 S THATCHER AVE

ZIP CODES

90292

RECENT ACTIVITY

DIR-2008-4703-DI

CASE NUMBERS

CPC-2014-1456-SP
CPC-2005-8252-CA
CPC-2000-4046-CA
CPC-1998-119
CPC-1995-148-GPC-ZC
CPC-1987-648-ICO
CPC-1984-226-SP
CPC-1963-14311
CPC-1949-2836
ORD-175694
ORD-175693
ORD-172897
ORD-172019
ORD-170999-SA60
ORD-170155
ORD-168999
ORD-162509
DIR-2014-2824-DI
ENV-2014-1458-EIR
ENV-2005-8253-ND
ENV-2004-2691-CE
ENV-2002-6836-SP
ENV-2001-846-ND
AFF-4831
CDP-1983-19

Address/Legal Information

PIN Number	105B149 535
Lot/Parcel Area (Calculated)	93,274.7 (sq ft)
Thomas Brothers Grid	PAGE 672 - GRID A6
Assessor Parcel No. (APN)	4229002901
Tract	RAFAEL AND ANDRES MACHADO TRACT
Map Reference	M R 84-33/34
Block	None
Lot	PT "UNNUMBERED LT"
Arb (Lot Cut Reference)	261
Map Sheet	105B149

Jurisdictional Information

Community Plan Area	Venice
Area Planning Commission	West Los Angeles
Neighborhood Council	Venice
Council District	CD 11 - Mike Bonin
Census Tract #	2741.00
LADBS District Office	West Los Angeles

Planning and Zoning Information

Special Notes	None
Zoning	[Q]PF-1XL
Zoning Information (ZI)	ZI-2406 Director's Interpretation of the Venice SP for Small Lot Subdivisio
	ZI-2471 Coastal Zone
	ZI-2452 Transit Priority Area in the City of Los Angeles
General Plan Land Use	Public Facilities
General Plan Note(s)	Yes
Hillside Area (Zoning Code)	No
Specific Plan Area	Los Angeles Coastal Transportation Corridor
Subarea	None
Specific Plan Area	Oxford Triangle
Subarea	None
Specific Plan Area	Venice Coastal Zone
Subarea	Oxford Triangle
Special Land Use / Zoning	None
Design Review Board	No
Historic Preservation Review	No
Historic Preservation Overlay Zone	None
Other Historic Designations	None
Other Historic Survey Information	None
Mills Act Contract	None
CDO: Community Design Overlay	None
CPIO: Community Plan Imp. Overlay	None
Subarea	None
CUGU: Clean Up-Green Up	None
NSO: Neighborhood Stabilization Overlay	No
POD: Pedestrian Oriented Districts	None
SN: Sign District	No

Adaptive Reuse Incentive Area	None
Ellis Act Property	No
Rent Stabilization Ordinance (RSO)	No
Transit Oriented Communities (TOC)	Not Eligible
CRA - Community Redevelopment Agency	None
Central City Parking	No
Downtown Parking	No
Building Line	None
500 Ft School Zone	No
500 Ft Park Zone	No

Assessor Information

Assessor Parcel No. (APN)	4229002901
APN Area (Co. Public Works)*	2.110 (ac)
Use Code	8800 - Miscellaneous - Government Owned Property
Assessed Land Val.	\$176,888
Assessed Improvement Val.	\$0
Last Owner Change	00/00/1964
Last Sale Amount	\$0
Tax Rate Area	67
Deed Ref No. (City Clerk)	None
Building 1	No data for building 1
Building 2	No data for building 2
Building 3	No data for building 3
Building 4	No data for building 4
Building 5	No data for building 5

Additional Information

Airport Hazard	None
Coastal Zone	Calvo Exclusion Area Coastal Zone Commission Authority
Farmland	Area Not Mapped
Urban Agriculture Incentive Zone	YES
Very High Fire Hazard Severity Zone	No
Fire District No. 1	No
Flood Zone	None
Watercourse	No
Hazardous Waste / Border Zone Properties	No
Methane Hazard Site	Methane Zone
High Wind Velocity Areas	No
Special Grading Area (BOE Basic Grid Map A-13372)	No
Oil Wells	None

Seismic Hazards

Active Fault Near-Source Zone	
Nearest Fault (Distance in km)	6.2252352
Nearest Fault (Name)	Santa Monica Fault
Region	Transverse Ranges and Los Angeles Basin
Fault Type	B
Slip Rate (mm/year)	1.00000000
Slip Geometry	Left Lateral - Reverse - Oblique
Slip Type	Moderately / Poorly Constrained
Down Dip Width (km)	13.00000000
Rupture Top	0.00000000
Rupture Bottom	13.00000000
Dip Angle (degrees)	-75.00000000

Alquist-Priolo Fault Zone	No
Landslide	No
Liquefaction	Yes
Preliminary Fault Rupture Study Area	No
Tsunami Inundation Zone	Yes

Economic Development Areas

Business Improvement District	None
Promise Zone	None
Renewal Community	No
Revitalization Zone	None
State Enterprise Zone	None
Targeted Neighborhood Initiative	None

Public Safety

Police Information

Bureau	West
Division / Station	Pacific
Reporting District	1444

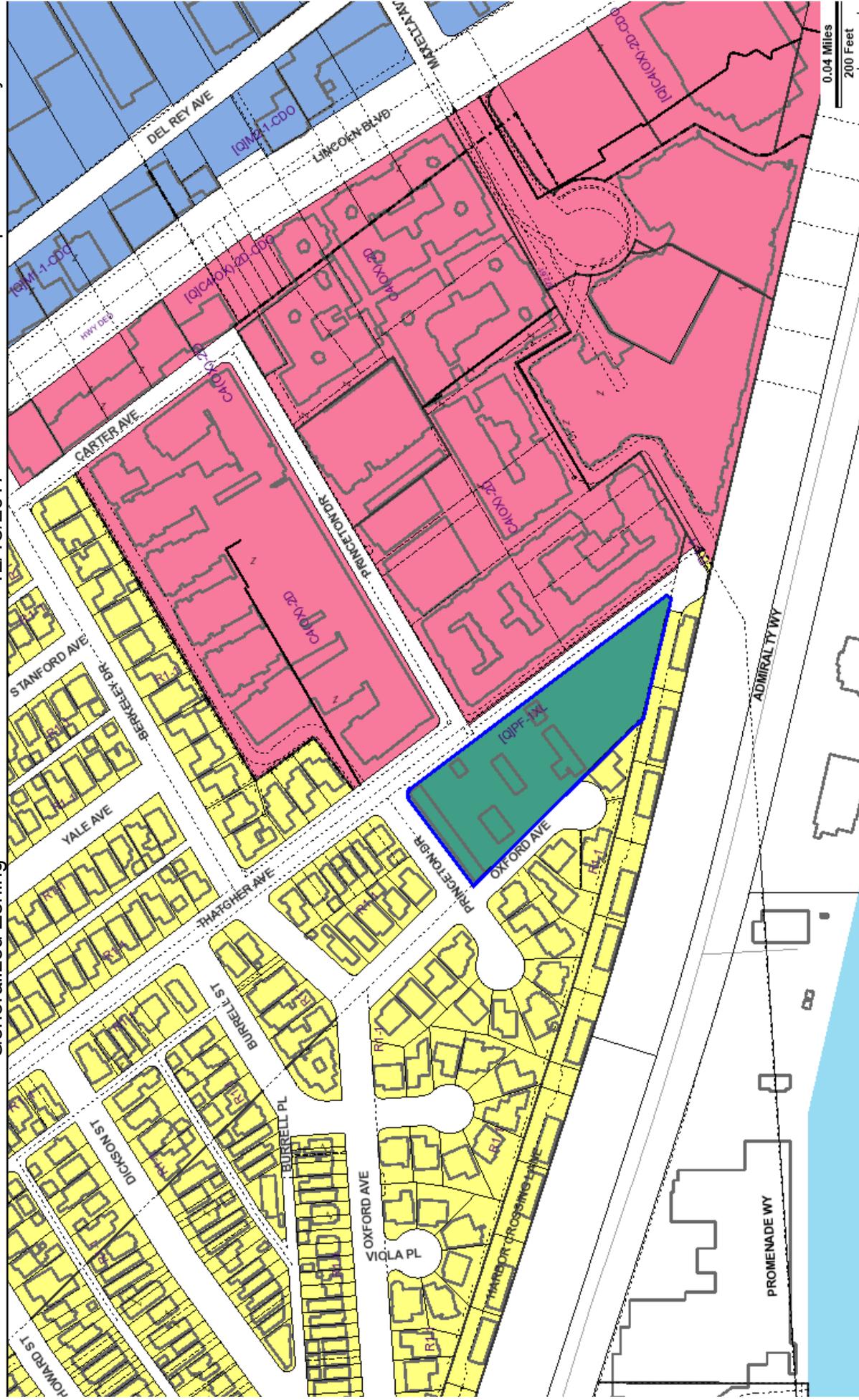
Fire Information

Bureau	West
Batallion	4
District / Fire Station	63
Red Flag Restricted Parking	No

Note: Information for case summaries is retrieved from the Planning Department's Plan Case Tracking System (PCTS) database.

Case Number:	CPC-2014-1456-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	SPECIFIC PLAN AMENDMENT
Case Number:	CPC-2005-8252-CA
Required Action(s):	CA-CODE AMENDMENT
Project Descriptions(s):	AN ORDINANCE ESTABLISHING PERMANENT REGULATIONS IMPLEMENTING THE MELLO ACT IN THE COASTAL ZONE.
Case Number:	CPC-2000-4046-CA
Required Action(s):	CA-CODE AMENDMENT
Project Descriptions(s):	
Case Number:	CPC-1998-119
Required Action(s):	Data Not Available
Project Descriptions(s):	
Case Number:	CPC-1995-148-GPC-ZC
Required Action(s):	GPC-GENERAL PLAN/ZONING CONSISTENCY (AB283) ZC-ZONE CHANGE
Project Descriptions(s):	Data Not Available
Case Number:	CPC-1987-648-ICO
Required Action(s):	ICO-INTERIM CONTROL ORDINANCE
Project Descriptions(s):	INTERIM CONTROL ORDINANCE FOR THE ENTIRE VENICE COASTAL ZONE WHICH WILL TEMPORARILY PERMIT ONLY BUILDING DEVELOPMENT WHICH IS IN CONFORMANCE WITH REGULATIONS SUBSTANTIALLY BASED ON THE CALIFORNIA COASTAL COMMISSIONS INTERPRETIVE GUIDELINES FOR THE AREA
Case Number:	CPC-1984-226-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	Data Not Available
Case Number:	CPC-1963-14311
Required Action(s):	Data Not Available
Project Descriptions(s):	
Case Number:	CPC-1949-2836
Required Action(s):	Data Not Available
Project Descriptions(s):	
Case Number:	DIR-2014-2824-DI
Required Action(s):	DI-DIRECTOR OF PLANNING INTERPRETATION
Project Descriptions(s):	DIRECTOR'S INTERPRETATION OF A SPECIFIC PLAN PURSUANT TO LAMC SECTION 11.5.7.H. THE INTERPRETATION SHALL ONLY BE APPLICABLE TO THE VENICE COASTAL SPECIFIC PLAN.
Case Number:	ENV-2014-1458-EIR
Required Action(s):	EIR-ENVIRONMENTAL IMPACT REPORT
Project Descriptions(s):	ENVIRONMENTAL IMPACT REPORT
Case Number:	ENV-2005-8253-ND
Required Action(s):	ND-NEGATIVE DECLARATION
Project Descriptions(s):	AN ORDINANCE ESTABLISHING PERMANENT REGULATIONS IMPLEMENTING THE MELLO ACT IN THE COASTAL ZONE.
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Required Action(s):	ND-NEGATIVE DECLARATION
Project Descriptions(s):	
Case Number:	CDP-1983-19
Required Action(s):	Data Not Available
Project Descriptions(s):	

ORD-175694
ORD-175693
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ORD-172019
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ORD-162509
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 Zoning: [QJPF-1XL]
 Tract: RAFAEL AND ANDRES MACHADO TRACT
 Block: None
 Lot: PT "UNNUMBERED LT"
 Arb: 261
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LEGEND

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TRANSIT ORIENTED COMMUNITIES (TOC)

- | | |
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LAMC SECTION 85.02 (VEHICLE DWELLING)

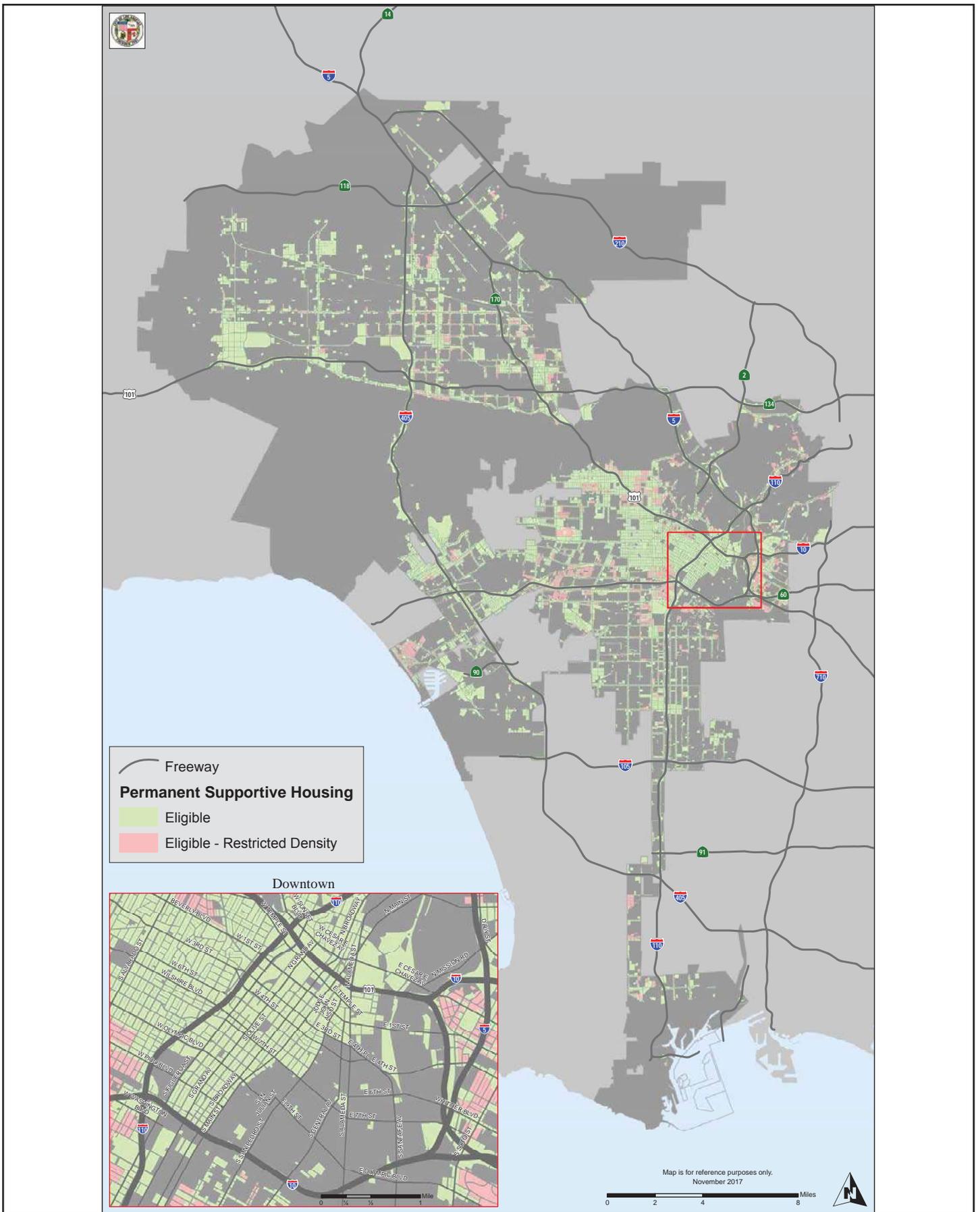
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|  Lot Cut |  Coastal Zone |  High Wind Zone |
|  Easement |  Council District |  Hillside Grading |
|  Zone Boundary |  LADBS District Office |  Historic Preservation Overlay Zone |
|  Building Line |  Downtown Parking |  Specific Plan Area |
|  Lot Split |  Fault Zone |  Very High Fire Hazard Severity Zone |
|  Community Driveway |  Fire District No. 1 |  Oil Wells |
|  Lot Ties |  Tract Map | |
|  Building Outlines 2014 |  Parcel Map | |
|  Building Outlines 2008 | | |

Attachments To The Channel Law Comments On The Environmental Documentation
For Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137)
And Proposed Redevelopment Of Thatcher Yard Located at 3233 S. Thatcher Avenue
(APN 4229-002-901)

Attachment 4
Location of PSH Ordinance Eligible Parcels.



SOURCE: City of Los Angeles Department of City Planning, 2017

FIGURE 4

PSH Eligible Parcels

Attachments To The Channel Law Comments On The Environmental Documentation
For Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137)
And Proposed Redevelopment Of Thatcher Yard Located at 3233 S. Thatcher Avenue
(APN 4229-002-901)

Attachment 4
Notice of Intent to Adopt MND from City's Website



Search Classifieds for

In Category

Zip Code

Miles around

Example: "Brown Couch"

All Categories

90012

50 miles

Go

Place an Ad with the Los Angeles Times!

Browse Categories

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- Antiques
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- Auto Parts
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- Bicycles
- Boats
- Books & Magazines
- Building Supplies & Materials
- Business & Commercial
- CDs/DVDs/VHS
- Clothing & Accessories
- Collectibles
- Computers & Technology
- Electronics
- Furniture
- Games & Toys
- Health & Beauty
- Household Items
- Jewelry
- Motorcycles & Scooters
- Musical Instruments
- Outdoor & Garden
- Pets
- Powered by Gadzoo.com
- Photography & Video
- Recreational Vehicles
- Sporting Goods
- Tickets
- Tools
- Wanted to Buy
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- Real Estate
- Services
- Announcements
- Events

Legal Notices: City Of

Legal Notices: CITY OF LOS ANGELES ENVIRONMENTAL NOTICES Notice is hereby given to the general public of the availability for public review and comment on the following Environmental documents. Please call Darlene Navarrete to review file: (213)978-1332. Files are available for REVIEW at: Los Angeles City Hall, 200 N. Spring St., Room 750, Los Angeles, CA 90012. Comments can be faxed to: (213)978-1343, or emailed to darlene.navarrete@lacity.org. (*unless otherwise noted). CD indicates the City Council District, sf indicates square feet and LAMC indicates Los Angeles Municipal Code. The publication is intended to serve as our Notice of Intent to adopt the following Mitigated Negative Declaration (MND) or Negative Declaration (ND) MITIGATED NEGATIVE DECLARATION-NG-17-138-PL: ENV-2017-1015. 15116-15216 S Vermont Ave & 747-761 W Redondo Beach Blvd; Harbor Gateway. CD15. The proposed project is the construction, use & maintenance of a new, 1-story (with mezzanine), 54-ft. tall, 466,402 sf warehouse/manufacturing/high-cube warehouse/distribution center with a total of 246 automobile parking spaces & 24 bicycle parking spaces. The proposed project requires Conditional Use Permits for a development which creates 250,000 sf or more of warehouse floor area & deviations from the Commercial Corner Development regulations; a Zoning Administrator's Adjustment to allow a 20% increase in the permitted building height; a Zoning Administrator's Determination to allow deviations from the Transitional Height provisions, and a Site Plan Review. REVIEW/COMMENT period ends: Jan. 2, 2018 NEGATIVE DECLARATION-NG-17-139-PL: ENV-2017-3410. Citywide zoning ordinance affecting all legally existing Hotels, Motels, Apartment Hotels, Transient Occupancy Residential Structures and Hostels located in the City of Los Angeles. CD's 1-15. The Proposed Interim Motel Conversion (IMC) Project is an ordinance (IMC Ordinance) that would amend Sections 12.03, 14.00 & 15.02 of the City of Los Angeles Municipal Code (LAMC) to establish regulations to facilitate the use of existing hotels & motels for Supportive Housing and/or Transitional Housing. The ordinance will remove regulatory barriers to allow for the temporary re-use of existing structures for residential purposes. The proposed amendment to LAMC Section 12.03 would formalize the definitions of Supportive Housing, Transitional Housing, and Supportive Services to reflect existing state law. The proposed amendments to LAMC Section 14.00 would change the approval process to allow existing residential structures such as Hotels, Motels, Apartment Hotels, Transient Occupancy Residential Structures & Hostels to conduct minor interior alterations & a temporary change of use to supportive housing and/or transitional housing. The supportive housing/transitional housing use is temporary, and is contingent upon the existence of a valid contract with a local public agency to provide that use; upon termination of any such contract, the Interim Motel Conversion Project would be required to revert to the previous legally existing use. Provisions are included in this section to ensure that the temporary change in use will not result in any increase in building footprint, the number of units, or the overall building height. The proposed amendments to LAMC Section 15.02 would amend the City's Rent Stabilization Ordinance to include an exemption for such projects, which are operating under the protection of a contract to provide the supportive housing and/or transitional housing use. REVIEW/COMMENT period ends: Dec. 20, 2017 MITIGATED NEGATIVE DECLARATION-NG-17-140-PL: ENV-2017-3137. Citywide zoning ordinance affecting all parcels in the City of Los Angeles zoned for multifamily residential use & located within High Quality Transit Areas (HQTA). Additionally, PSH development could occur on some parcels zoned Public Facilities (PF), and on some sites which are currently protected under the City's Residential Hotel Unit Conversion & Demolition Ordinance in LAMC Section 47.70 et seq. CD's 1-15. The Proposed Permanent Supportive Housing (PSH) Project is an ordinance (PSH Ordinance) that would amend the City of Los Angeles Municipal Code (LAMC) to facilitate development of PSH units. The purpose of this ordinance is to improve the process for the development of these units. The Proposed PSH Project would amend Sections 12.03, 12.04.09, 14.00 & 16.05 of the LAMC establishing regulations that define PSH & project eligibility criteria, establish unique development standards for PSH, and facilitate administrative review & approval, as well as modify certain provisions related to height & density. The Project also includes amendments to the Land Use element of the City's General Plan (consisting of 35 Community Plans) to allow PSH development to exceed any otherwise applicable minimum lot area per dwelling unit or guest room standards for the zone in which it is located. The PSH Ordinance would allow for projects to select up to 4 concessions with respect to the Zoning Code, including up to 20% decrease in required setbacks, up to 20% reduction in required open space, up to 20% increase in lot coverage limits, up to 35% increase in FAR and depending on the height district up to a 35% increase in height or one additional story. Additional design requirements include that when adjacent to or across an alley from an R2 or more restrictive zone, the building's transitional height shall be stepped-back within a 45-degree angle. REVIEW/COMMENT period ends: Dec. 20, 2017

Additional Information

Posted: 2 weeks, 5 days, 19 hours ago
Category: Public & Legal Notices

PUBLICATION OF ENVIRONMENTAL NOTICES

LOS ANGELES TIMES

THURSDAY, NOVEMBER 30, 2017

Notice is hereby given to the general public of the availability for public review and comment on the following Environmental documents. Please call Darlene Navarrete to review file: (213)978-1332. Files are available for REVIEW at: Los Angeles City Hall, 200 N. Spring St., Room 750, Los Angeles, CA 90012. Comments can be faxed to: (213)978-1343, or emailed to darlene.navarrete@lacity.org. (*unless otherwise noted). CD indicates the City Council District, sf indicates square feet and LAMC indicates Los Angeles Municipal Code. The publication is intended to serve as our Notice of Intent to adopt the following Mitigated Negative Declaration (MND) or Negative Declaration (ND)

MITIGATED NEGATIVE DECLARATION-NG-17-138-PL: [ENV-2017-1015](#). [ENV-2017-1015-A](#). [ENV-2017-1015-B](#). [ENV-2017-1015-C](#). [ENV-2017-1015-D](#). 15116-15216 S Vermont Ave & 747-761 W Redondo Beach Blvd; Harbor Gateway. CD15. The proposed project is the construction, use & maintenance of a new, 1-story (with mezzanine), 54-ft. tall, 466,402 sf warehouse/manufacturing/high-cube warehouse/distribution center with a total of 246 automobile parking spaces & 24 bicycle parking spaces. The proposed project requires Conditional Use Permits for a development which creates 250,000 sf or more of warehouse floor area & deviations from the Commercial Corner Development regulations; a Zoning Administrator's Adjustment to allow a 20% increase in the permitted building height; a Zoning Administrator's Determination to allow deviations from the Transitional Height provisions, and a Site Plan Review. REVIEW/COMMENT period ends: Jan. 2, 2018

NEGATIVE DECLARATION-NG-17-139-PL: [ENV-2017-3410](#). Citywide zoning ordinance affecting all legally existing Hotels, Motels, Apartment Hotels, Transient Occupancy Residential Structures and Hostels located in the City of Los Angeles. CD's 1-15. The Proposed Interim Motel Conversion (IMC) Project is an ordinance (IMC Ordinance) that would amend Sections 12.03, 14.00 & 151.02 of the City of Los Angeles Municipal Code (LAMC) to establish regulations to facilitate the use of existing hotels & motels for Supportive Housing and/or Transitional Housing. The ordinance will remove regulatory barriers to allow for the temporary re-use of existing structures for residential purposes. The proposed amendment to LAMC Section 12.03 would formalize the definitions of Supportive Housing, Transitional Housing, and Supportive Services to reflect existing state law. The proposed amendments to LAMC Section 14.00 would change the approval process to allow existing residential structures such as Hotels, Motels, Apartment Hotels, Transient Occupancy Residential Structures & Hostels to conduct minor interior alterations & a temporary change of use to supportive housing and/or transitional housing. The supportive housing/transitional housing use is temporary, and is contingent upon the existence of a valid contract with a local

public agency to provide that use; upon termination of any such contract, the Interim Motel Conversion Project would be required to revert to the previous legally existing use. Provisions are included in this section to ensure that the temporary change in use will not result in any increase in building footprint, the number of units, or the overall building height. The proposed amendments to LAMC Section 151.02 would amend the City's Rent Stabilization Ordinance to include an exemption for such projects, which are operating under the protection of a contract to provide the supportive housing and/or transitional housing use. REVIEW/COMMENT period ends: Dec. 20, 2017

MITIGATED NEGATIVE DECLARATION-NG-17-140-PL: [ENV-2017-3137](#). Citywide zoning ordinance affecting all parcels in the City of Los Angeles zoned for multifamily residential use & located within High Quality Transit Areas (HQTA). Additionally, PSH development could occur on some parcels zoned Public Facilities (PF), and on some sites which are currently protected under the City's Residential Hotel Unit Conversion & Demolition Ordinance in LAMC Section 47.70 et seq. CD's 1-15. The Proposed Permanent Supportive Housing (PSH) Project is an ordinance (PSH Ordinance) that would amend the City of Los Angeles Municipal Code (LAMC) to facilitate development of PSH units. The purpose of this ordinance is to improve the process for the development of these units. The Proposed PSH Project would amend Sections 12.03, 12.04.09, 14.00 & 16.05 of the LAMC establishing regulations that define PSH & project eligibility criteria, establish unique development standards for PSH, and facilitate administrative review & approval, as well as modify certain provisions related to height & density, consistent with State Density Bonus Law. The PSH Ordinance would allow for projects to select up to four concessions with respect to Zoning Code, including up to 20% decrease in required setbacks, up to 20% reduction in required open space, up to 20% increase in lot coverage limits, up to 35% increase in FAR and depending on the height district up to a 35% increase in height or one additional story. Additional design requirements include that when adjacent to or across an alley from an R2 or more restrictive zone, the building's transitional height shall be stepped-back within a 45-degree angle. REVIEW/COMMENT period ends: Dec. 20, 2017

Attachments To The Channel Law Comments On The Environmental Documentation
For Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137)
And Proposed Redevelopment Of Thatcher Yard Located at 3233 S. Thatcher Avenue
(APN 229-002-901)

Attachment 6
CEQANet, State Clearinghouse Records for SCAG's RTP/SCS EIR



[OPR Home](#) > [CEQAnet Home](#) > [CEQAnet Query](#) > Search Results

Click Project Title link to display all related documents. Document Type link will display full document description.

Records Found: 8

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Page: 1

Query Parameters:			Date Range:		
SCH#	Lead Agency	Project Title	Description	Document Type	Date Received
2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	The 2016 RTP/SCS Amendment #1 includes the inclusion and/or revision to 76 transportation projects, or approx. 2 percent of the total 2016 RTP/SCS projects. Changes include revisions to the project scope, cost and/or schedule to 54 projects already included in the 2016 RTP/SCS and inclusion of 22 new projects. The revisions and additions to the Project List will not result in substantial changes to the previously adopted 2016 RTP/SCS. (for further details, please refer to Page 4 "Project Description" in the ADD PEIR). An Addendum EIR was prepared since revisions would not result in new significant impacts or substantial increases to impacts.	NOD	7/11/2017
2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	Note: Review Per Lead The 2016 RTP/SCS Amendment #1 includes the inclusion and/or revision to 76 transportation projects, or approx. 2 percent of the total 2016 RTP/SCS projects. Changes include revisions to the project scope, cost and/or schedule to 54 projects already included in the 2016 RTP/SCS and inclusion of 22 new projects. The revisions and additions to the Project List will not result in substantial changes to the previously adopted 2016 RTP/SCS. (for further details, please refer to Page 4 "Project Description" in the ADD PEIR). An Addendum EIR was prepared since revisions would not result in new significant impacts or substantial increases to impacts.	ADM	7/10/2017
2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	The 2016 RTP/SCS Amendment #1 includes the inclusion and/or revision to 76 transportation projects, or approx. 2 percent of the total 2016 RTP/SCS projects. Changes include revisions to the project scope, cost and/or schedule to 54 projects already included in the 2016 RTP/SCS and inclusion of 22 new projects. The revisions and additions to the Project List will not result in substantial changes to the previously adopted 2016 RTP/SCS. (for further details, please refer to Page 4 "Project Description" in the ADD PEIR). An Addendum EIR was prepared since revisions would not result in new significant impacts or substantial increases to impacts.	ADM	4/10/2017
2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	The 2016 RTP/SCS Amendment #1 includes the inclusion and/or revision to 76 transportation projects, or approx. 2 percent of the total 2016 RTP/SCS projects. Changes include revisions to the project scope, cost and/or schedule to 54 projects already included in the 2016 RTP/SCS and inclusion of 22 new projects. The revisions and additions to the Project List will not result in substantial changes to the previously adopted 2016 RTP/SCS. (for further details, please refer to Page 4 "Project Description" in the ADD PEIR). An Addendum EIR was prepared since revisions would not result in new significant impacts or substantial increases to impacts.	NOD	4/10/2017
2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	Note: FYI Final The 2016 RTP/SCS updates the last adopted 2012 RTP/SCS, last amended in Sept. 2014, by refining goals, objectives, and policies and list of projects, and extending the planning horizon to 2040. As with the 2012 RTP/SCS, the 2016 RTP/SCS is intended to continue the region's various	FIN	4/8/2016

strategies that improve the balance between land use and transportation and transit systems, both current and future.

2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	The 2016 RTP/SCS updates the last adopted 2012 RTP/SCS, last amended in Sept. 2014, by refining goals, objectives, and policies and list of projects, and extending the planning horizon to 2040. As with the 2012 RTP/SCS, the 2016 RTP/SCS is intended to continue the region's various strategies that improve the balance between land use and transportation and transit systems, both current and future.	Oth	4/8/2016
2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	Note: Extended Review per lead. The 2016 RTP/SCS updates the last adopted 2012 RTP/SCS, last amended in Sept. 2014, by refining goals, objectives, and policies and list of projects, and extending the planning horizon to 2040. As with the 2012 RTP/SCS, the 2016 RTP/SCS is intended to continue the region's various strategies that improve the balance between land use and transportation and transit systems, both current and future.	EIR	12/4/2015
2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	The 2016 RTP/SCS updates the last adopted 2012 RTP/SCS, last amended in Sept. 2014, by refining goals, objectives, and policies and list of projects, and extending the planning horizon to 2040. As with the 2012 RTP/SCS, the 2016 RTP/SCS is intended to continue the region's various strategies that improve the balance between land use and transportation and transit systems, both current and future.	NOP	3/9/2015

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Addendum #2 to the 2016-2040 RTP/SCS

SCH Number: 2015031035

Document Type: EIR - Draft EIR

Project Lead Agency: Southern California Association of Governments

Project Description

Note: Extended Review per lead. The 2016 RTP/SCS updates the last adopted 2012 RTP/SCS, last amended in Sept. 2014, by refining goals, objectives, and policies and list of projects, and extending the planning horizon to 2040. As with the 2012 RTP/SCS, the 2016 RTP/SCS is intended to continue the region's various strategies that improve the balance between land use and transportation and transit systems, both current and future.

Contact Information

Primary Contact:

Ms. Lijin Sun
Southern California Association of Governments
213-236-1882
818 W. 7th Street; 12th Floor
Los Angeles, CA 90017-3435

Project Location

County: Los Angeles
City: Los Angeles, City of
Region:
Cross Streets:
Latitude/Longitude:
Parcel No:
Township:
Range:
Section:
Base:
Other Location Info: six-county area

Proximity To

Highways:
Airports:
Railways:
Waterways:
Schools:
Land Use:

Development Type

Power: Hydroelectric

Local Action

Project Issues

Agricultural Land, Air Quality, Archaeologic-Historic, Biological Resources, Coastal Zone, Drainage/Absorption, Economics/Jobs, Fiscal Impacts, Flood Plain/Flooding, Forest Land/Fire Hazard, Geologic/Seismic, Minerals, Noise, Population/Housing Balance, Public Services, Recreation/Parks, Schools/Universities, Sewer Capacity, Soil Erosion/Compaction/Grading, Solid Waste, Toxic/Hazardous, Traffic/Circulation, Vegetation, Water Quality, Wetland/Riparian, Water Supply, Growth Inducing, Landuse, Cumulative Effects, Aesthetic/Visual

Reviewing Agencies (Agencies in **Bold Type** submitted comment letters to the State Clearinghouse)

Resources Agency; California Coastal Commission; Coachella Valley Mountains Conservancy; **Department of Fish and Wildlife, Headquarters**; Cal Fire; Office of Emergency Services, California; California Highway Patrol; Caltrans, Division of Transportation Planning; Air Resources Board, Transportation Projects; State Water Resources Control Board, Division of Water Quality; Regional Water Quality Control Board, Region 4; Regional Water Quality Control Bd., Region 6 (Victorville); **Regional Water Quality Control Bd., Region 6 (So Lake Tahoe)**; Regional Water Quality Control Board, Region 7; Regional Water Quality Control Board, Region 8; Regional Water Quality Control Board, Region 9; Native American Heritage Commission; Public Utilities Commission

Date Received: 12/4/2015 **Start of Review:** 12/4/2015 **End of Review:** 2/1/2016

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Addendum #2 to the 2016-2040 RTP/SCS

SCH Number: 2015031035

Document Type: ADM - Addendum

Alternate Title: 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS)

Project Lead Agency: Southern California Association of Governments

Project Description

Note: Review Per Lead The 2016 RTP/SCS Amendment #1 includes the inclusion and/or revision to 76 transportation projects, or approx. 2 percent of the total 2016 RTP/SCS projects. Changes include revisions to the project scope, cost and/or schedule to 54 projects already included in the 2016 RTP/SCS and inclusion of 22 new projects. The revisions and additions to the Project List will not result in substantial changes to the previously adopted 2016 RTP/SCS. (for further details, please refer to Page 4 "Project Description" in the ADD PEIR). An Addendum EIR was prepared since revisions would not result in new significant impacts or substantial increases to impacts.

Contact Information

Primary Contact:

Ping Chang
Southern California Association of Governments
213-236-1839
818 W. 7th Street; 12th Floor
Los Angeles, CA 90017-3435

Project Location

County: Los Angeles
City:
Region:
Cross Streets:
Latitude/Longitude:
Parcel No:
Township:
Range:
Section:
Base:
Other Location Info: six-county area

Proximity To

Highways:
Airports:
Railways:
Waterways:
Schools:
Land Use:

Development Type

Other (2016 RTP/SCS)

Local Action

Project Issues

Coastal Zone, Drainage/Absorption, Economics/Jobs, Fiscal Impacts, Flood Plain/Flooding, Forest Land/Fire Hazard, Geologic/Seismic, Minerals, Noise, Population/Housing Balance, Public Services, Recreation/Parks, Schools/Universities, Sewer Capacity, Soil Erosion/Compaction/Grading, Solid Waste, Toxic/Hazardous, Traffic/Circulation, Vegetation, Water Quality, Wetland/Riparian, Water Supply, Growth Inducing, Landuse, Cumulative Effects, Aesthetic/Visual, Agricultural Land, Septic System, Air Quality, Archaeologic-Historic

Reviewing Agencies (Agencies in **Bold Type** submitted comment letters to the State Clearinghouse)

Resources Agency; Department of Fish and Wildlife, Headquarters; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, Division of Transportation Planning; Native American Heritage Commission; Public Utilities Commission; Regional Water Quality Control Board, Region 4; Regional Water Quality Control Bd., Region 6 (Victorville); Regional Water Quality Control Board, Region 7; Regional Water Quality Control Board, Region 8; Regional Water Quality Control Board, Region 9; Air Resources Board, Transportation Projects

Date Received: 7/10/2017 **Start of Review:** 7/10/2017 **End of Review:** 8/24/2017

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Channel Law Group, LLP

8200 Wilshire Blvd.
Suite 300
Beverly Hills, CA 90211

Phone: (310) 347-0050
Fax: (323) 723-3960
www.channellawgroup.com

JULIAN K. QUATTLEBAUM, III *
JAMIE T. HALL **
CHARLES J. McLURKIN

Writer's Direct Line: (310) 982-1760
jamie.hall@channellawgroup.com

*ALSO Admitted in Colorado
**ALSO Admitted in Texas

December 20, 2017

VIA ELECTRONIC MAIL

Los Angeles Planning Commission
Department of City Planning,
City Hall - Room 763,
200 North Spring Street,
Los Angeles CA 90012

Via email: darlene.navarrete@lacity.org
and: cally.hardy@lacity.org

**Re: Comments On The Environmental Documentation For, And The,
Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-
3137) And Proposed Redevelopment Of Venice Dell Pacific Site Located At
125 E. Venice Blvd (APN 4238-024-900 To 911)**

Dear Planning Commissioners:

This firm represents Venice Vision with regard to the proposed development at 125 E. Venice Boulevard as well as the Permanent Supportive Housing Ordinance proposed by the City of Los Angeles (City). The City released the Permanent Supportive Housing (PSH) Ordinance for a 60-day comment period beginning on August 31, 2017 and ending on October 30, 2017. On October 30, 2017 Channel Law provided the City with comments on the Permanent Supportive Housing (PSH) Ordinance, including comments on:

- The lack of availability of a California Environmental Quality Act (CEQA) document during the public review period for the PSH Ordinance;
- The inaccurate project description provided as part of the answers to the Frequently Asked Questions attached to the Notice requesting comments on the PSH Ordinance;
- The failure of the PSH Ordinance Notice to disclose the creation of a new CEQA exemption;
- The inadequate project description resulting from failure to describe the number and location of PSH developments;
- The inadequate requirement for the provision of supportive services, and its potential to result in environmental consequences; and,

- The need to address the potential for growth-inducing impacts, cumulative impacts, and increased water demand.

Channel Law’s comment letter is incorporated herein by reference and included as **Attachment 1** to this letter. Channel Law asked a number of questions regarding the PSH Ordinance and also made the following suggestions regarding ways to amend the PSH Ordinance in that letter, including:

- Remove the new CEQA exemption for PSH projects; instead the existing CEQA low-income housing exemption should be applied.
- Include language in the Ordinance to make clear that pursuant to CEQA Guidelines Section 15268(d) where a PSH project involves an approval that contains elements of both a ministerial action and a discretionary action, the project will be deemed to be discretionary and will be subject to the requirements of CEQA.
- Allow for automatic rezoning of only those parcels addressed in the environmental document for the proposed Ordinance, or specifically addressed in the environmental document for the applicable area plan.
- Add requirements for provision of an appropriate level of supportive services to be maintained over the life of individual PSH projects.

Channel Law has not received responses to our questions or comments. Channel Law’s comment letter was not included in the December 14, 2017 Staff Report and agenda packet for the Planning Commission. Furthermore, Channel Law’s comments and suggestions have been largely ignored, and have not been adequately addressed in the December 14, 2017 Staff Report, including the following Exhibits to the Staff Report:

- A - Proposed Permanent Supportive Housing Ordinance
- B - Environmental Clearance
 - B.1 Mitigated Negative Declaration
 - B.2 Addendum to the SCAG 2016-2040 RTP/SCS PEIR, SCH No. 2015031035
- C - Affordable Housing Opportunity Sites

On November 30, 2017 the City released the Mitigated Negative Declaration (MND) for the project, for public review and comment. The City has not circulated the “Addendum” to the SCAG 2016-2040 RTP/SCS PEIR or noticed the availability of the Addendum.

This comment letter provides comments on both the City’s flawed process and problems with the environmental documents for the PSH Ordinance. We would request responses to both the comments contained in this letter, and our October 30, 2017 letter.

1. THE CITY’S PROCESS FOR REVIEWING AND APPROVING THE PERMANENT SUPPORTIVE HOUSING ORDINANCE IS FATALLY FLAWED

The City has engaged in a confusing and fatally flawed process regarding the adoption of the Permanent Supportive Housing Ordinance (PSH Ordinance).

1.1 The City Conducted Public Hearings and Ended The Comment Period On The Ordinance Prior to Release of the Environmental Document

The City released the PSH Ordinance for a 60-day comment period beginning on August 31, 2017 and ending on October 30, 2017. During the 60-day comment period, staff held two public hearings on the PSH Ordinance, on: September 25, 2017 and September 28, 2017. The comment period thus ended a month before the City's November 30, 2017 release of the MND for the project.

The failure to provide the public with the MND for the PSH Ordinance until one month after the close of the public comment period on the PSH Ordinance has inappropriately limited public comment on the PSH Ordinance, in violation of Public Resources Code (PRC) Section (§) 21003.1 and CEQA Guidelines §15004 which states:

(b) Choosing the precise time for CEQA compliance involves a balancing of competing factors. EIRs and negative declarations should be prepared as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment.

...

(c) The environmental document preparation and review should be coordinated in a timely fashion with the existing planning, review, and project approval processes being used by each public agency. These procedures, to the maximum extent feasible, are to run concurrently, not consecutively. When the lead agency is a state agency, the environmental document shall be included as part of the regular project report if such a report is used in its existing review and budgetary process.

Channel Law commented in our October 30, 2017 letter on the fact that failure to provide the public with a copy of the CEQA document during the public review period inhibited the ability of the public to comment on, or fully understand, the potential impacts of the proposed PSH Ordinance. In addition, requiring the public to separately comment on the PSH Ordinance and then subsequently on the MND for the project, unduly burdens the public, since as noted in the Channel Law letter, a full description of the components and sites affected by the PSH Ordinance was not made available to the public during the comment period on the Ordinance.

According to the Staff Report for the December 14, 2017 Planning Commission hearing on the PSH Ordinance, the City has made the following changes to the August 30, 2017 version of the PSH Ordinance:

- References were added to State Density Bonus law to make clear that the ordinance is intended to create permanent supportive housing units consistent with state density bonus provisions. This revision ensures that the grant of any bonuses, incentives, or concessions under this ordinance shall not be considered an increase in density or other change which requires any corresponding zone change, general plan amendment, specific plan

exception, or discretionary action. This does not supersede or in any way alter or lessen the effect or application of the Coastal Act.

- To ensure general plan land use consistency, the amendment to the PF Zone was revised to allow the application of the least restrictive adjacent zone, in lieu of the least restrictive zone within 1/4-mile radius of the project site.
- To more closely align with other incentives, a modification was made to allow for up to 20% relief in any other development standard not already specified, in lieu of 35% relief.
- The construction standards were revised to be more consistent with Mitigation Measures included in the Mitigated Negative Declaration prepared for the ordinance.
- The definition of a Qualified PSH Project was amended to reflect recent changes to definitions for project funding requirements under Measure HHH and ensure that these requirements are in alignment.
- The setback incentive was revised to respect prevailing front yards in residential zones.
- To further ensure high quality, pedestrian-scale design, additional design standards were added related to screening of parking structures.

The modified PSH Ordinance was not made available to the public concurrent with the release on the MND for the PSH Ordinance. In addition, it is unclear whether the MND analyzes the August 17, 2017 or current version of the PSH Ordinance. Which version is analyzed in the MND?

1.2 The Planning Commission Took Action on the Project Prior to The Close of the MND Comment Period

The PSH Ordinance was considered by the Planning Commission on December 14, 2017, prior to the close of the 20-day comment period on the MND on December 20, 2017. At the Planning Commission hearing, recommended actions included (See **Attachment 2** – Audio Links Item 12):¹

- | | |
|-----------------------------|---|
| RECOMMENDED

ACTIONS: | <ol style="list-style-type: none">1. Recommend adoption of the proposed ordinance (Exhibit A);2. Adopt the staff report as the Commission report on the subject;3. Adopt the attached Findings;4. Recommend that the City Council FIND that pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including Mitigated Negative Declaration No. ENV-2017-3137-MND ("Mitigated Negative Declaration-) (Exhibit B.1), and all comments received, with imposition of mitigation measures, there is no substantial evidence that the project will have a Significant effect on the |
|-----------------------------|---|

¹Item CPC-2017-3409-CA <https://planning.lacity.org/InternetCalendar/pdf.aspx?Id=59215>
See Attachment 2 – Item 12 with a link to the Audio of hearing:
<https://planning.lacity.org/InternetCalendar/pdf.aspx?Id=59322>
<http://planning.lacity.org/StaffRpt/Audios/CPC/2017/12-14-2017/13%20CPC-2017-3409.mp3>

environment; FIND the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; FIND the mitigation measures have been made conditions on the project; and ADOPT the Mitigated Negative Declaration; and

5. **Recommend** that the City Council FIND, based on their independent judgment, after consideration of the whole of the administrative record, including the SCAG 2016-2040 RTP/SCS PEIR, SCH No. 2015031035, certified on April 7, 2016 (EIR) and the Addendum prepared for the Permanent Supportive Housing Ordinance (Addendum) (Exhibit B.2), the project was assessed in the EIR and pursuant to the CEQA Guidelines, Sections 15162 and 15164 and the Addendum that no major revisions to the EIR are required and no subsequent EIR or negative declaration is required for approval of the project.

The Planning Commission took the actions recommended by Staff. As noted in the Letter of Determination dated December 19, 2017 for the PSH Ordinance included as **Attachment 2**, the Planning Commissions actions included the following finding (emphasis added):

1. Found pursuant to CEQA Guidelines Section 1507 4(b), after consideration of the whole of the administrative record, including Mitigated Negative Declaration No. ENV-2017- 3137-MND (Mitigated Negative Declaration), **and all comments received**, with imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; Found that the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; Found the mitigation measures have been made enforceable conditions on the project; and adopt the Mitigated Negative Declaration; and Adopted the Mitigated Negative Declaration and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;
- ...
4. Approved and recommended that the City Council adopt the proposed ordinance, as amended by the Commission, subject to review by the City Attorney as to form and legality; and
5. Adopted and recommended that the City Council adopt the attached Findings.

The Planning Commission's findings contain an untruth. The Planning commission could not have considered comments on the MND before approving the ordinance, since the Planning Commission acted before completion of the public comment period on the MND. This is a violation of CEQA Guidelines § 15004(b), which states:

- (2) To implement the above principles, public agencies shall not undertake actions concerning the proposed public project that would have a significant adverse effect or limit the choice of alternatives or mitigation measures, before completion of CEQA compliance. For example, agencies shall not:

- (A) Formally make a decision to proceed with the use of a site for facilities which would require CEQA review, regardless of whether the agency has made any final purchase of the site for these facilities, except that agencies may designate a preferred site for CEQA review and may enter into land acquisition agreements when the agency has conditioned the agency's future use of the site on CEQA compliance.
- (B) Otherwise take any action which gives impetus to a planned or foreseeable project in a manner that forecloses alternatives or mitigation measures that would ordinarily be part of CEQA review of that public project.

1.3 The City Circulated The Mitigated Negative Declaration For 21-Days, Rather Than The 30-Days Required For A Project Of Area-Wide Significance

The MND for the PSH Ordinance was release for public review and comment on November 30, 2017 for a 21-day period ending December 20, 2017. As noted on page II-1 of the MND: "The Proposed Ordinance would apply citywide." The MND is for a project of area-wide significance, as defined in CEQA Guidelines §15206(b)(2).² Therefore, pursuant to CEQA the MND should have been circulated for 30-day public review and comment.

As shown in MND Figure 4, included in **Attachment 4**, PSH-eligible parcels are located throughout the City and in close proximity to other jurisdictions. The proposed project has the potential to result in impacts that extend beyond the City in which the project is located.

Recent research has indicated the potential for the construction of PSH to induce in-migration of additional homeless into a Continuum of Care (CoC) area or inhibit out-migration of homeless.³ A Continuum of Care (CoC) is a regional or local planning body that coordinates housing and services funding for homeless families and individuals. There are 414 CoCs in the United States. The Los Angeles CoC covers the Los Angeles County area, but excludes the cities of Glendale, Pasadena and Long Beach. There are 88 incorporated cities in Los Angeles County. The PSH Ordinance thus has the potential to impact 85 of the cities and the County of Los Angeles, which are part of the Los Angeles CoC.

The proposed project is of area-wide significance as defined in CEQA Guidelines §15206(b)(2) since it will result in the construction of more than 500 dwelling units. As noted on page II-4 of the MND: "The City's Comprehensive Homeless Strategy identified a need to build at least 1,000 PSH units per year, an increase of up to 700 units from its current average production rate of approximately 300 units per year. As noted on page II-5 of the MND:

² In addition, several of the round-one parcels are located within the Coastal Zone, as shown on MND Figure 5. **Attachment 3** contains the City of Los Angeles Parcel Profile Report for the parcels located at 125 E Venice Boulevard (The Venice Dell Pacific Site, incorrectly listed as 200 E Venice Boulevard in the MND and Exhibit C to the Staff Report) and Thatcher Yard parcel at 3238 Thatcher Avenue, showing that these two parcels are located in the Coastal Zone. Therefore any EIR required for the project would need to be circulated to the State Clearinghouse pursuant to CEQA 15206(b)(4)(C).

³ Corinth, Kevin. "The Impact of Permanent Supportive Housing on Homeless Populations." Journal of Housing Economics 35 (2017) 69-84. Page 75. Available at: https://ac.els-cdn.com/S1051137715300474/1-s2.0-S1051137715300474-main.pdf?_tid=0cedc104-ba9c-11e7-a99d-00000aacb35f&acdnt=1509056685_fceb158ca8e69a34586fd1d9d46ba052

Based on this study, and due to the fact that the construction of PSH is constrained by the availability of public funding, it is reasonably foreseeable that the Proposed PSH Ordinance could, with the most generous assumptions (and conservative for purposes of environmental review), result in the construction of an additional 200 units per year of PSH in addition to the 1,000 units per year anticipated to result from Measure HHH and other previously approved gap-funding projects. Therefore, for purposes of the City's analysis of the PSH Ordinance in this MND, the City is analyzing the impacts of construction and operation of 2,000 units constructed over a 10-year period (200 units/year). Construction of the other 10,000 or 1,000 units a year for the next 10 years is part of the cumulative development allowed by the previously approved gap funding projects, identified above.

The public and affected and responsible agencies have been provided with inadequate time to review and comment on the MND for the PSH Ordinance. The PSH Ordinance should have been circulated for a 30-day comment period.

1.4 Violation of CEQA Guidelines § 15072(b) - The City Failed To Provide The Notice As Required By CEQA To Channel Law

In Channel Law's October 30, 2017 letter on the PSH Ordinance on page 2, Channel Law requested that the City:

Please contact us and provide information on the timeline for CEQA compliance and the type of CEQA document to be prepared. Indicate how participation in the CEQA process will be coordinated with the Ordinance review and consideration process. Please provide any notices or other information regarding this Ordinance to us at the address listed on our letterhead.

Although Jamie Hall of our office did receive email notice, on December 7, 2017⁴ (at 5:36 PM) from Cally Hardy - Los Angeles City Planning Assistant, regarding the fact that: "The Permanent Supportive Housing Ordinance (CPC-2017-3136-CA) has been scheduled for next Thursday's (12/14) meeting of the City Planning Commission," Channel Law received no notice regarding the availability of the MND or Addendum for the project, despite having commented on the need for CEQA compliance prior to approval of the PSH Ordinance, and having requested provision of notices or other information regarding this matter. CEQA Guideline § 15072 requires in part that:

- (b) The lead agency shall mail a notice of intent to adopt a negative declaration or mitigated negative declaration to the last known name and address of all organizations and individuals who have previously requested such notice in writing . . .

⁴ On November 30, 2017 the City released the Mitigated Negative Declaration (MND) for the project, for public review and comment. Notice of the Planning Commission hearing and how to access the Staff Report for the hearing was not received until December 7, seven days after the start of the comment period on the MND.

The City thus failed to proceed in the manner proscribed by law, and inhibited Channel Law's ability to participate in the CEQA process by failing to provide notice of the availability of the CEQA documents.

1.4. The City's Notice of Intent to Adopt the MND Fails to Comply with the Noticing Requirements of CEQA Guidelines Section 15070(g)

The environmental notice for the MND (Mitigated Negative Declaration-NG-17-140-PL: ENV-2017-3137) is included as **Attachment 5**. It states:

MITIGATED NEGATIVE DECLARATION-NG-17-140-PL: ENV-2017 3137. Citywide zoning ordinance affecting all parcels in the City of Los Angeles zoned for multifamily residential use & located within High Quality Transit Areas (HQTAs). Additionally, PSH development could occur on some parcels zoned Public Facilities (PF), and on some sites which are currently protected under the City's Residential Hotel Unit Conversion & Demolition Ordinance in LAMC Section 47.70 et seq. CD's 1-15. The Proposed Permanent Supportive Housing (PSH) Project is an ordinance (PSH Ordinance) that would amend the City of Los Angeles Municipal Code (LAMC) to facilitate development of PSH units. The purpose of this ordinance is to improve the process for the development of these units. The Proposed PSH Project would amend Sections 12.03, 12.04.09, 14.00 & 16.05 of the LAMC establishing regulations that define PSH & project eligibility criteria, establish unique development standards for PSH, and facilitate administrative review & approval, as well as modify certain provisions related to height & density, consistent with State Density Bonus Law. The PSH Ordinance would allow for projects to select up to four concessions with respect to Zoning Code, including up to 20% decrease in required setbacks, up to 20% reduction in required open space, up to 20% increase in lot coverage limits, up to 35% increase in FAR and depending on the height district up to a 35% increase in height or one additional story. Additional design requirements include that when adjacent to or across an alley from an R2 or more restrictive zone, the building's transitional height shall be stepped-back within a 45-degree angle. REVIEW/COMMENT period ends: Dec. 20, 2017.

The notice fails to include the following information required by CEQA Guidelines § 15070(g):

- (g) A notice of intent to adopt a negative declaration or mitigated negative declaration shall specify the following:
 - (2) The starting and ending dates for the review period during which the lead agency will receive comments on the proposed negative declaration or mitigated negative declaration. This shall include starting and ending dates for the review period. If the review period has been shortened pursuant to Section 15105, the notice shall include a statement to that effect.
 - (3) The date, time, and place of any scheduled public meetings or hearings to be held by the lead agency on the proposed project, when known to the lead agency at the time of notice.
 - (5) The presence of the site on any of the lists enumerated under Section 65962.5 of the Government Code including, but not limited to lists of

hazardous waste facilities, land designated as hazardous waste property, and hazardous waste disposal sites, and the information in the Hazardous Waste and Substances Statement required under subdivision (f) of that section.

The Notice fails to include several required items. Although the notice is dated November 30, 2017, it fails to specially state the starting and ending dates for public review per CEQA Guidelines § 15070(g)(2). Although a Planning Commission hearing was held on December 14, 2017 and separately noticed on December 7, 2017, the environmental notice published on the City's website and in the Los Angeles Times fails to list the date, time and place of this known public meeting per CEQA Guidelines § 15070(g)(3). Although the MND identifies the potential for PSH sites to be included on a list of hazardous materials sites complied pursuant to Government Code Section 65962.5, and includes a mitigation measure to address this,⁵ the environmental notice published by the City fails to identify this, per CEQA Guidelines § 15070(g)(5).

1.5 The City Inappropriately Relies In-Part On An Addendum Prepared By The City to An EIR Prepared By Another Agency

In an effort to provide cover for the City's failure to both prepare an adequate MND for the project and to comply with MND process requirements specified in CEQA, the Planning Commission was also presented with a second, separate environment document for the PSH Ordinance: a City-prepared Addendum to the Program Environmental Impacts Report (PEIR) for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by the Southern California Association of Governments (SCAG).⁶ This was included as a separate environmental document for the PSH Ordinance. This was no doubt done in order to further frustrate the ability of the public to review and comment on the environmental document for the project, since an Addendum need not be circulated for public review.

According to the Letter of Determination included in **Attachment 2**, Planning Commission then took the following action at its December 14, 2017 meeting:

At its meeting of December 14, 2017, the Los Angeles City Planning Commission took the actions below in conjunction with the approval of the proposed ordinance: . . .

2. Approve and recommend that the City Council find, based on their independent judgement, after consideration of the whole of the administrative record, including the SCAG 2016-2040 RTP/ SCS PEIR (SCH No. 2015031035), certified on April 7, 2016 (EIR) and the Addendum prepared for the PSH Ordinance (Addendum), the project was assessed in the EIR and pursuant to the CEQA Guidelines, Sections 15162 and 15164 and the

⁵ MND pages III-5 and IV-37 to IV-39.

⁶ A copy of the PEIR is available at: <http://scagtrpsecs.net/Pages/DRAFT2016PEIR.aspx>

Copies of the SCAG's two Addendums are available at:

<http://scagtrpsecs.net/Pages/FINAL2016PEIR.aspx>

<http://scagtrpsecs.net/Pages/2016RTPSCSAmendments.aspx>

Addendum that no major revisions to the EIR are required and no subsequent EIR, or negative declaration is required for approval of the project;

Use Of Both An MND and Addendum For The Same Project Is Inappropriate

Nowhere in CEQA is it contemplated that a Lead Agency would prepare two concurrent and separate environmental documents for a project. Doing so is particularly egregious when the public has been afforded inadequate time to review one of the documents and no time to review the other. In fact, preparation of the Addendum is contrary to a number of CEQA precepts, including:

- PRC § 21003, which states in part: “(f) All persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical, and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment.”
- Guidelines §15002(a), which states: Basic Purposes of CEQA. The basic purposes of CEQA are to: (1) Inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities.
- Guidelines §15002 (j), which states: Public Involvement. Under CEQA, an agency must solicit and respond to comments from the public and other agencies concerned with the project. (See: Sections 15073, 15086, 15087, and 15088.)

Addendum Process Failed To Comply With CEQA

Not only is the use of an Addendum inappropriate in this case for a number of reasons, the City has failed to comply with the procedural requirements for an Addendum. The requirements for use of an Addendum are specified in CEQA Guidelines §15164

15164. ADDENDUM TO AN EIR OR NEGATIVE DECLARATION

- (a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- (c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- (d) The decision making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
- (e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency’s findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

The Addendum prepared by the City does not specify the changes or additions that are necessary SCAG’s RTP/SCS PEIR to address the PSH Ordinance. As required by Guidelines §15164(c) the final PEIR was not provided along with the Addendum to the Planning Commission. As required by Guidelines §15164(d) the Planning Commission did not consider the Addendum with the final prior to making a decision on the project.

The City's preparation of an Addendum is clearly an attempt to circumvent criticism of inadequate provisions for public review of the MND for the PSH Ordinance. This is ironic, given, as shown in **Attachment 6**, the Southern California Association of Governments (SCAG) sent both the PEIR and the SCAG's Addendums to the RTP/SCS PEIR to the State Clearinghouse.⁷ The City has sent neither the MND nor the Addendum to the State Clearinghouse. SCAG not only circulated the Draft EIR for the RTP/SCS for public comment from 12/4/2015 to 2/1/2016, SCAG also circulated its Addendum to the RTP/SCS PEIR for public review and comment from 7/10/2017 to 8/24/2017 (see **Attachment 6**). The City has provided no opportunity for public review and comment on its "Addendum" to the RTP/SCS EIR, nor has it provided the Lead Agency for the PEIR, SCAG, with the opportunity to comment on the Addendum to the RTP/SCS PEIR.

Violation of CEQA Guidelines §15153

Given that the City's Addendum provides no information on the modifications to the RTP/SCD PEIR that are necessary to make the document adequate as the environmental document for the PSH Ordinance, the City is essentially making use of an EIR from an earlier project, the 2016-2040 RTP/SCS. While it is questionable whether a Lead Agency may make use of another agency's EIR for their own project, if the City were to do so, it would need to comply with the requirements of Guidelines §15153, which state in part:

15153. USE OF AN EIR FROM AN EARLIER PROJECT

- (a) The Lead Agency may employ a single EIR to describe more than one project, if such projects are essentially the same in terms of environmental impact. Further, the Lead Agency may use an earlier EIR prepared in connection with an earlier project to apply to a later project, if the circumstances of the projects are essentially the same.
- (b) When a Lead Agency proposes to use an EIR from an earlier project as the EIR for a separate, later project, the Lead Agency shall use the following procedures:
 - (1) The Lead Agency shall review the proposed project with an Initial Study, using incorporation by reference if necessary, to determine whether the EIR would adequately describe:
 - (A) The general environmental setting of the project,
 - (B) The significant environmental impacts of the project, and
 - (C) Alternatives and mitigation measures related to each significant effect.
 - (2) If the Lead Agency believes that the EIR would meet the requirements of subdivision (1), it shall provide public review as provided in Section 15087 stating that it plans to use the previously prepared EIR as the draft EIR for this project. . .
 - (3) The Lead Agency shall prepare responses to comments received during the review period.

Use of an EIR from an earlier project thusly does not absolve the City from the need to provide the public with the opportunity to review and comment on the EIR being used.

⁷ SCH # 2015031035.

The City Should Have Tiered Off the RTP/SCS PEIR Rather Than Prepared an Addendum to the RTP/SCS PEIR

Rather than prepare an Addendum to a Program EIR that was not prepared by the City, CEQA would dictate that the City prepare one environmental document for the PSH Ordinance and tier that environmental document off the RTP/SCS PEIR, if appropriate. This is in fact what SCAG envisioned cities would do, when it prepared the RTP/SCS PEIR. As explained by SCAG on page 1 of Addendum # 2 to the RTP/SCS PEIR:

Pursuant to Section 15152 of the CEQA Guidelines, subsequent environmental analyses for separate, but related, future projects may tier off the analysis contained in the 2016 RTP/SCS PEIR.

This is in fact noted in the City's Addendum, for the PSH Ordinance, which states on pages 1-2, that SCAG envisioned the 2016 RTP/SCS PEIR be used for tiering:

The 2016 RTP/SCS PEIR was drafted as a first tier document that would support local agencies in the SCAG region in considering subsequent projects. As stated in the 2016 RTP/SCS PEIR:

This PEIR provides a first-tier, programmatic environmental analysis, for a long range, regional scale plan document that will support local agencies in the evaluation of subsequent projects, and facilitate avoidance, reduction, and minimization of direct and indirect impacts, growth-inducing impacts, and cumulative environmental impacts with respect to local projects. The project proponent seeking to construct and operate individual properties will need to identify the public agency who will have the primary discretionary land use decision with respect to second tier projects. Consistent with the provisions of Section 15050(a) of the State CEQA Guidelines, the determination of the appropriate second-tier level of environmental review will be determined by the lead agency with primary discretion and decision-making authority for subsequent projects being considered for approval that is subject to CEQA. (RTP/SCS PEIR at 1-2.)

The tiering process is described in PRC §21094 and CEQA Guidelines §15152. As required by PRC §21094(c):

- (c) For purposes of compliance with this section, an initial study shall be prepared to assist the lead agency in making the determinations required by this section. The initial study shall analyze whether the later project may cause significant effects on the environment that were not examined in the prior environmental impact report.

As explained in CEQA Guidelines §15152(f), depending on the outcome of the Initial Study, the Lead Agency may then prepare either a EIR or negative declaration. There is no provision in CEQA or Guidelines §15152 for preparing an addendum when tiering:

- (f) A later EIR shall be required when the initial study or other analysis finds that the later project may cause significant effects on the environment that were not adequately addressed in the prior EIR. A negative declaration shall be required when the provisions of Section 15070 are met.

The City has inappropriately prepared an Addendum for the PSH Ordinance. The Addendum can not and does not excuse the flaws in the MND process for the PSH Ordinance.

2. COMMENTS ON THE STAFF REPORT FOR THE PSH ORDINANCE

2.1 Staff Report and MND Provide Unclear and Conflicting Information Regarding Application of the PSH Ordinance to the Venice Dell Pacific Site and the Thatcher Yard Site

100-1

City's Staff Report provide the following unclear and conflicting information regarding the applicability of the PSH Ordinance to the Venice Dell Pacific and Thatcher Yard Sites, stating:

Applicability of PSH Ordinance to Specific Sites

Staff have received numerous comments from members of the public pertaining to specific project sites (see "*Public Communications*"). The proposed ordinance was not drafted with any particular sites in mind, but rather to amend citywide land use regulations governing the development of PSH. In particular, two City-owned properties that are part of the AHOS Initiative led by the Office of the CAO were the subject of many comments received: the Venice Dell Pacific site and the Thatcher Yard site, both in the Venice Community Plan area. The CAO has selected a developer to submit a proposal for each of these sites; however, no proposal has been finalized at this time. It is not clear the extent to which the proposed ordinance may apply to any projects proposed for those sites, or whether the proposed projects would qualify for the provisions of the ordinance.

The Venice Dell Pacific site (125 E. Venice Blvd.) is zoned for Open Space (OS), and therefore would not be eligible for the proposed ordinance as residential uses are not an allowed use in the OS Zone.

The Thatcher Yard site (3233 S. Thatcher Ave.) is zoned for Public Facilities (PF), and is adjacent to an R1 and C4 Zone. The proposed amendments to the PF Zone could facilitate the application of the uses and standards of the adjacent C4 Zone to this site, only if the proposal were for a Qualified PSH project as defined in the ordinance. However, the site is within the Coastal Zone and the Oxford Triangle Specific Plan area and thus would be subject to discretionary review in accordance with these requirements and appropriate environmental clearance.

However, Exhibit C to the Staff Report, the MND and the Addendum identify both of these properties as Round-One Properties. Exhibit C and similar pages in the environmental documents indicate that the City has an Exclusive Negotiating Agreement (ENA) with Hollywood Community Housing Corporation and Venice Community Housing for the Venice

Dell Pacific Site, despite the fact that it is zoned Open Space. Is the City planning to re-zone the site? Exhibit C indicates that the City has an Exclusive Negotiating Agreement (ENA) with Thomas Safran and Associates for the Thatcher Yard Site. What environmental documents were prepared prior to entering into the ENAs for these two sites? As noted in our October 30, 2017 comment letter, Section 16.05 B.2 of the City's Municipal Code specifies that any project requiring a coastal development permit is discretionary, thus triggering CEQA. As shown in **Attachment 3**, both of these sites are located in the Coastal Zone. Pursuant to Public Resources Code § 21003.1 and CEQA Guidelines §15004 environmental review should have been conducted prior to executing the ENAs. What environmental document will be prepared prior to approving any project on these two sites? The MND should identify those site that will be subject to further environmental review, the nature of that review and whether the environmental documents will be circulated to the public for review and comment.

3. COMMENTS ON THE ENVIRONMENTAL DOCUMENTS FOR THE PSH ORDINANCE

As previously noted in this comment letter, Channel Law and members of the public have been provided with insufficient time to review and comment on the environmental documents for the PSH Ordinance. Given the time constrains, we off these preliminary comments on the defects in the environmental documents.

3.1 Inadequate Project Description – Failure to Identify All Potential PSH City Owned Land

100-2

The MND needs to explain which Round One Properties (MND Table 5, MND pages 38-39) will be subject to separate environmental review, which are addressed in the MND, and which are considered exempt from environmental review with and without the PSH Ordinance. (See also comments in Section 2.1 above.) The MND needs to identify the development potential of the Round One Properties. The environmental document for the project needs to provide site-specific analysis for known project sites.

In terms of City-owned property and sites in the Public Facilities Zone (PF), the environmental documents identify only the seven Round One Properties, and indicates that: The CAO intends to continue to identify suitable City owned properties on an annual basis, which will the be included in Request for Proposals to the City's qualified list of developers."⁸ The MND can not be used as the environmental clearance for PSH projects unless they are more specifically identified in the MND; Figure 4 is insufficient.

The project description in the MND fails to disclose that the Ordinance creates a new CEQA exemption for PSH projects in two sections of the Ordinance, and that this new exemption is inconsistent with Public Resources Code (CEQA) Section 21159.21 and does not require compliance with Public Resources Code (PRC) Section 21159.23. PRC Section 21159.21 provides the criteria for qualifying for housing project exemptions⁹ and PRC Section 21159.23 provides for an exemption for low-income housing for residential housing consisting of 100 or fewer units.¹⁰ Pursuant to CEQA a low-income housing project would not qualify for an

⁸ Addendum, page 39.

⁹ See also CEQA Guidelines Section 15192.

¹⁰ See also CEQA Guidelines Section 15194.

exemption “if there is a reasonable possibility that the project would have a significant effect on the environment or the residents of the project due to unusual circumstances or due to the related or cumulative impacts of reasonably foreseeable projects in the vicinity of the project.”¹¹ Pursuant to PRC Section 21159.21, a low income housing project would not qualify for an exemption if it is inconsistent with any applicable general plan, specific plan or local coastal program; community-level environmental review has not been adopted or certified; existing utilities are not adequate to serve the project; the site is on a list of hazardous materials sites; the project would impact historical resources; or is in a hazards area.

In contrast, the Ordinance provides for an exemption for PSH projects, by adding the following language to Article 6.1 – Review of Development Projects, Section 16.05D – Exemptions,¹² via Section 4 of the Ordinance:

Section 4. Subdivision 8 of Subsection D of Section 16.05 of the Los Angeles Municipal Code is added to read as follows:

8. A Qualified Permanent Supportive Housing Project developed pursuant to Section 14.00 A.11 of this Code and containing no more than 120 units, or no more than 200 units if it is located in the Greater Downtown Housing Incentive Area.¹³

The Ordinance thus allows for exemption of PSH projects with a larger number of units than would be allowed under existing CEQA exemptions. This change to existing CEQA exemptions, to create a less restrictive exemption for PSH projects is a discretionary action subject to CEQA review, should be disclosed in the MND and analyzed in the environmental document for the PSH Ordinance.

3.2 Project Impacts

We offer the following limited comments on the discussion of potential project impacts, given the inadequate time provided for review and comment on the environmental documents for the PSH Ordinance.

Impact on Crime

In addressing whether it is appropriate to increase the size of the low-income housing (i.e. PSH) projects eligible for an exemption, the environmental document for the Ordinance should address the fact that the Minnesota Housing Finance Agency’s Research and Evaluation Unit in their review of housing studies found:¹⁴

100-3

¹¹ CEQA (Public Resources Code) 21159.23(c).

¹² Section 16.05D states: “Unless made discretionary by any other provision of law, the approval of any building permit for a development project which does not exceed the thresholds set forth in this subsection and Section 12.24U14 is ministerial and exempt from the requirements of the California Environmental Quality Act.

¹³ Page 9, Draft Ordinance 8/30/2017.

¹⁴ Discussion Paper, Impact of Affordable Housing on Communities and Households, Minnesota Housing Finance Agency, page 4.

Impact on Neighborhood Crime

Research on the relationship between affordable housing and crime identifies project scale as the most important factor in determining the impact on neighborhood crime rates. Multiple studies find that smaller projects (typically less than 50 units) have no impact on neighborhood crime, but that larger projects may result in increased crime. This finding was common across multiple types of affordable housing, including non-profit rental housing, public housing, and supportive housing.

Impact on Property Values

The MND should address the fact that there is evidence, that PSH facilities may lead to a decrease in property values when located in higher income areas. According to “The Impacts of Supportive Housing on Neighborhoods and Neighbors:

100-4

While the *average* relationship between this set of supportive housing facilities and proximate house prices was positive, not all site/neighborhood combinations in Denver experienced the same relationship. When we disaggregated our analysis to measure impacts for different common clusters of sites/neighborhoods, we found that the set of five supportive housing sites located in low-valued, heavily minority-occupied (typically majority Black-occupied) neighborhoods consistently evinced the positive price impacts noted above. By contrast, the site in the highest-value, overwhelmingly white-occupied neighborhood apparently had a *negative* effect on house prices, as did another (poorly maintained) site in a modestly valued, high-density core neighborhood having 24 percent of its population classified as Hispanic.¹⁵

...

Our central finding—that supportive housing generally has a positive impact on neighborhoods when done at a small scale, but that poorly managed properties can be deleterious to neighborhoods—implies that public policy would do well to encourage both public education and high-quality operation in the realm of supportive housing. Our findings also strongly suggest that the public sector pay strict attention to the ongoing operation, tenant management, and physical maintenance of supportive housing facilities.¹⁶

The environmental document should address the potential environmental consequences of changes in property values.

Increase in Water Demand

CEQA Guidelines Section 15155 requires the City to consult with the applicable water agency for any water-demand project, including residential development of more than 500 units,

100-5

¹⁵ “The Impacts of Supportive Housing on Neighborhoods and Neighbors”, The Urban Institute (October 1999), George Galster et al, page xii:

¹⁶ Ibid, page xiv:

as part of the preparation of the environmental document for the project (in this case the Ordinance). Given that the intent of the Ordinance is to increase the production of PSH, with a goal of at least an additional 2000 units over 10 years, as part of the preparation of the environmental document for the Ordinance, the City should have consulted with the applicable water agency to determine if the intended effects of the Ordinance were included in the most recently adopted urban water management plan and to prepare a water assessment approved at a regular or special meeting of that governing body.

Growth Inducing Impacts

Recent research has indicated the potential for the construction of PSH to induce in-migration of additional homeless into a Continuum of Care (CoC) area¹⁷ or inhibit out-migration of homeless. As explained by Corinth:

100-6

One potentially important factor that could affect estimates of associations between PSH and homelessness is migration. A CoC that expands its inventory may experience an inflow of homeless people seeking services or a reduced outflow of homeless people to other CoCs.¹⁸

Between 2007 and 2014, communities across the United States rapidly expanded the inventory of PSH beds for homeless individuals with disabling conditions. . . I find that each additional PSH bed was associated with between 0.04 and 0.12 fewer homeless people after one year. Causal effects identified on the basis of lagged funding decisions imply that one additional PSH bed reduces homeless counts by up to 0.10 people. Effect sizes of greater than 0.72 can be rejected at the 95% confidence level, ruling out the simple reasoning that adding one unit of housing reduces homelessness by one person. Relatively modest effects may be explained by some combination of poor targeting, differential exit rates into private housing from PSH relative to homelessness, incentives for remaining homeless, errors in homeless counts, and migration in response to expanded PSH. Indeed, PSH expansion in the rest of a state is associated with significant reductions in homeless counts within a community, consistent with homeless migration in response to PSH expansion.¹⁹

The environmental analysis for the proposed Ordinance should therefore address the growth-inducing impacts of the proposed Ordinance.

¹⁷ A Continuum of Care (CoC) is a regional or local planning body that coordinates housing and services funding for homeless families and individuals. There are 414 CoCs in the United States. The Los Angeles CoC covers the Los Angeles County area, but excludes the cities of Glendale, Pasadena and Long Beach.

¹⁸ Corinth, Kevin. "The Impact of Permanent Supportive Housing on Homeless Populations." *Journal of Housing Economics* 35 (2017) 69-84. Page 75. Available at: https://ac.els-cdn.com/S1051137715300474/1-s2.0-S1051137715300474-main.pdf?_tid=0cedc104-ba9c-11e7-a99d-00000aacb35f&acdnat=1509056685_fceb158ca8e69a34586fd1d9d46ba052

¹⁹ Corinth, Kevin. "The Impact of Permanent Supportive Housing on Homeless Populations." *Journal of Housing Economics* 35 (2017) 69-84. Page 80.

Cumulative Impacts

The PSH Ordinance is not the only ordinance currently under consideration by the City to address homelessness. The City is concurrently considering an Interim Motel Conversion Ordinance (CPC-2017-3409-CA; ENV-2017-3410-ND). Although the case numbers for the Motel Conversion appear to indicate that a Negative Declaration has been prepared for the Motel Conversion Ordinance, the Negative Declaration does not appear to be available on the City's website. The environmental document for the PSH Ordinance should include the cumulative projects resulting from the Motel Conversion Ordinance and should address the potential cumulative impacts associated with the City's full Comprehensive Homeless Strategy.

100-7

4. CONCLUSION

The City has not proceeded in the manner prescribe by law regarding the environmental documentation for the PSH Ordinance. The City must therefore take the following actions:

- Void the actions taken by the Planning Commission regarding the PSH Ordinance and the associated environmental documents;
- Prepare a single environmental document for the PSH Ordinance and circulate that document for public review in accordance with the requirements for projects of area-wide significance;
- Provide Notice of the Availability of the revised document to all those who have comment on the environmental documents or the PSH Ordinance, including Channel Law.

Thank you in advance for your thoughtful consideration of these issues of concern. I maybe contacted at 310-982-1760 or at jamie.hall@channellawgroup.com if you have any questions, comments or concerns.

Sincerely,



Jamie T. Hall

ATTACHMENTS:

1. Channel Law letter dated October 30, 2017 regarding: Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV- 2017-3137-EAF) and Notification of Non-Compliance with CEQA with Regard to the Permanent Supportive Housing Ordinance and Proposed Redevelopment of Venice Dell Pacific Site located at 125 E. Venice Blvd (APN 4238-024-900 to 911)
2. Planning Commission Letter of Determination Regarding the PSH Ordinance and Associated CEQA Documents and the Planning Commission Meeting Audio Links for the December 14, 2017 Hearing, See Item 12.
3. City of Los Angeles Parcel Profile Reports (ZIMAS Reports) For Two Parcels In the Coastal Zone.
4. Location of PSH Ordinance Eligible Parcels.
5. Notice of Intent to Adopt MND from City's Website
6. CEQANet, State Clearinghouse Records for SCAG's RTP/SCS EIR.

Attachments To The
Channel Law Comments On The Environmental Documentation For, And The,
Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And
Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd
(APN 4238-024-900 To 911)
December 20, 2017

**ATTACHMENTS TO CHANNEL LAW LETTER DATED DECEMBER 20, 2017
REGARDING THE PERMANENT SUPPORTIVE HOUSING ORDINANCE
AND ASSOCIATED ENVIRONMENTAL DOCUMENTS**

Attachments:

1. Channel Law letter dated October 30, 2017 regarding: Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV- 2017-3137-EAF) and Notification of Non-Compliance with CEQA with Regard to the Permanent Supportive Housing Ordinance and Proposed Redevelopment of Venice Dell Pacific Site located at 125 E. Venice Blvd (APN 4238-024-900 to 911)
2. Planning Commission Letter of Determination Regarding the PSH Ordinance and Associated CEQA Documents and the Planning Commission Meeting Audio Links for the December 14, 2017 Hearing, See Item 12.
3. City of Los Angeles Parcel Profile Reports (ZIMAS Reports) For Two Parcels In the Coastal Zone.
4. Location of PSH Ordinance Eligible Parcels.
5. Notice of Intent to Adopt MND from City's Website
6. CEQANet, State Clearinghouse Records for SCAG's RTP/SCS EIR

Attachments To The
Channel Law Comments On The Environmental Documentation For, And The,
Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And
Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd
(APN 4238-024-900 To 911)
December 20, 2017

Attachment 1

Channel Law letter dated October 30, 2017 regarding: Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV- 2017-3137-EAF) and Notification of Non-Compliance with CEQA with Regard to the Permanent Supportive Housing Ordinance and Proposed Redevelopment of Venice Dell Pacific Site located at 125 E. Venice Blvd (APN 4238-024-900 to 911)

Channel Law Group, LLP

8200 Wilshire Blvd.
Suite 300
Beverly Hills, CA 90211

Phone: (310) 347-0050
Fax: (323) 723-3960
www.channellawgroup.com

JULIAN K. QUATTLEBAUM, III *
JAMIE T. HALL **
CHARLES J. McLURKIN

Writer's Direct Line: (310) 982-1760
jamie.hall@channellawgroup.com

*ALSO Admitted in Colorado
**ALSO Admitted in Texas

October 30, 2017

VIA ELECTRONIC MAIL

Los Angeles Planning Commission
Department of City Planning,
City Hall - Room 763,
200 North Spring Street,
Los Angeles CA 90012

Via email: cally.hardy@lacity.org

Re: Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137-EAF) and Notification of Non-Compliance with CEQA with Regard to the Permanent Supportive Housing Ordinance and Proposed Redevelopment of Venice Dell Pacific Site located at 125 E. Venice Blvd (APN 4238-024-900 to 911)

Dear Planning Commissioners:

This firm represents Venice Vision with regard to the proposed development at 125 E. Venice Boulevard as well as the City's proposed Permanent Supportive Housing Ordinance. The City released a Notice of a Public Hearing on the Permanent Supportive Housing Ordinance (proposed Ordinance). The Notice listed two meeting dates: September 25, 2017 and September 28, 2017 and indicated that last day to submit comments to staff was October 30, 2017. The Notice indicated that after October 30, 2017 comments should be addressed to the City Planning Commission, but did not provide the date by which such comments should be provided. The Notice also did not indicate when the City Planning Commission would consider the proposed Ordinance. In addition the Notice provides no information on California Environmental Quality Act (CEQA) document availability for the proposed Ordinance.

Permanent Supportive Housing Ordinance Lack of CEQA Document

The timeline provided in the presentation materials at the Staff Public Hearing of September 25, 2017 indicates that the CEQA document would be completed by the time the Draft Ordinance was released for public comment (see **Attachment 1**), yet it appears no CEQA

document has been completed. Lack of a CEQA document inhibits the ability of the public to comment on, or fully understand, the potential impacts of the proposed Ordinance.

Given the project numbers assigned to the proposed Ordinance (CPC-2017-3136-CA; ENV-2017-3137-EAF) it appears only the City's Environmental Assessment Form (EAF) may have been completed to date for the Ordinance, and this document is not available on the City's website. An Environmental Assessment Form is not one of the three types of environmental documents specified in CEQA and the CEQA Guidelines. No action should be taken on the Ordinance until the appropriate CEQA document has been prepared and circulated for public review per the CEQA Guidelines.¹

Please contact us and provide information on the timeline for CEQA compliance and the type of CEQA document to be prepared. Indicate how participation in the CEQA process will be coordinated with the Ordinance review and consideration process. Please provide any notices or other information regarding this Ordinance to us at the address listed on our letterhead.

Inaccurate Project Description

The Frequently Asked Questions (and answers) attached to the Notice provides the following information:

Qualified PSH Projects would be allowed in zones that allow a multifamily residential use (RD zone and less restrictive).²

Per State law in California SB 2 (2007), PSH projects are required to be treated the same as any residential use in the same zone. This means that PSH projects can be built anywhere a multifamily residential building is allowed under the Zoning Code. The proposed ordinance does not change where PSH units are currently allowed in the city.³

This is misleading. Allowable uses in the Public Facilities (PF) zone currently are as follows (emphasis added):

B. Use. The following regulations shall apply to publicly owned land classified in the "PF" Public Facilities Zone. No building, structure or land shall be used and no building or structure shall be erected, moved onto a site, structurally altered, enlarged or maintained, except for the following uses:

1. Farming and nurseries, under power transmission rights-of-way. (Amended by Ord. No. 181,188, Eff. 7/18/10.)
2. Public parking facilities located under freeway rights-of-way.
3. Fire stations and police stations.

¹ See for example CEQA Guidelines 15075, 15089 and 15090.

² Notice, page 1.

³ Notice, page 3.

4. (Amended by Ord. No. 173,492, Eff. 10/10/00.) Government buildings, structures, offices and service facilities including maintenance yards, provided, however, that those uses identified in Section 12.24U21 shall require conditional use approval pursuant to that section.

5. Public libraries not located inside public parks.

6. Post offices and related facilities.

7. Public health facilities, including clinics and hospitals.

8. Public elementary and secondary schools.

9. Any joint public and private development uses permitted **in the most restrictive adjoining zones** if approved by the Director utilizing the procedures described in Section 16.05E to H. The phrase “adjoining zones” refers to the zones on properties abutting, across the street or alley from or having a common corner with the subject property. If there are two or more different adjoining zones, then **only the uses permitted by the most restrictive zone shall be permitted.**

10. (Amended by Ord. No. 174,132, Eff. 9/3/01.) Conditional uses as allowed pursuant to Section 12.24 U 21 and Section 12.24 W 49 of this Code when the location is approved pursuant to the provisions of the applicable section.⁴

The proposed Ordinance amends the Public Facilities (PF) Zone, to allow for automatic rezoning to allow for a qualified Permanent Supportive Housing Project as follows (emphasis added):

SEC. 12.04.09. “PF” PUBLIC FACILITIES ZONE.

9. Any joint public and private development uses permitted in the most restrictive adjoining zones if approved by the Director utilizing the procedures described in Section 16.05 E to H. The phrase “adjoining zones” refers to the zones on properties abutting, across the street or alley from or having a common corner with the subject property. If there are two or more different adjoining zones, then only the uses permitted by the most restrictive zone shall be permitted. **If the joint public and private development is a Qualified Permanent Supportive Housing Project developed pursuant to Section 14.00 A.11 of this Code, the uses and standards permitted by the least restrictive zone within a 1,320 foot radius shall be permitted utilizing the procedures described therein.**

The ordinance thus allows for automatic rezoning of a PF zone consistent with **the least restrictive zone within a 1,320 foot radius** for a Permanent Supportive Housing (PSH) project. Under the Ordinance Qualified PSH Projects would be allowed in a zone that currently may not allow multifamily residential.

⁴ Los Angeles Municipal Code, Chapter 1, Section 12.04.09 B.

Please explain how the 1,320-foot radius figure was selected. Please indicate how much of the parcel with less restrictive zoning must be within the 1,320-foot radius for the PF zoned parcel to take on the less restrictive zoning.

Inadequate Notice - Failure to Disclose Creation of A New CEQA Exemption

CEQA applies to discretionary approvals.⁵ Section 16.05 B.2 of the City's Municipal Code (LAMC) defines a discretionary approval as including:

2. Discretionary Approval. (Amended by Ord. No. 184,827, Eff. 3/24/17.) An approval initiated by application of a property owner or representative related to the use of land including, but not limited to a:

- (a) zone change;
- (b) height district change;
- (h) coastal development permit;
- (i) development agreement;
- (k) density bonus greater than the minimums pursuant to Government Code Section 65915;
- (m) exception from a geographically specific plan;
- (o) public benefit projects; or
- (p) floor area deviation of less than 50,000 square feet pursuant to [14.5.7](#) of [Article 4.5](#) of the Los Angeles Municipal Code.

Currently PF zoning allows joint public and private development uses permitted **in the most restrictive adjoining zones** if approved by the Director utilizing the procedures described in **Section 16.05E to H**.

Section 16.05E(4) of the Planning and Zoning Code specifies the following:

4. The Director shall not approve or conditionally approve a site plan review for a development project unless an appropriate environmental review clearance has been prepared in accordance with the requirements of CEQA. (Amended by Ord. No. 185,052, Eff. 8/14/17.)

Please verify that this requirement would continue to apply to joint public and private development uses in the PF Zone and that they would continue to be subject to the requirement to complete environmental review pursuant to CEQA.

⁵ CEQA Guidelines 15002(i).

The Notice fails to disclose that the Ordinance creates a new CEQA exemption for PSH projects in two sections of the Ordinance, and that this new exemption is inconsistent with Public Resources Code (CEQA) Section 21159.21 and does not require compliance with Public Resources Code (PRC) Section 21159.23. PRC Section 21159.21 provides the criteria for qualifying for housing project exemptions⁶ and PRC Section 21159.23 provides for an exemption for low-income housing for residential housing consisting of 100 or fewer units.⁷ Pursuant to CEQA a low-income housing project would not qualify for an exemption “if there is a reasonable possibility that the project would have a significant effect on the environment or the residents of the project due to unusual circumstances or due to the related or cumulative impacts of reasonably foreseeable projects in the vicinity of the project.”⁸ Pursuant to PRC Section 21159.21, a low income housing project would not qualify for an exemption if it is inconsistent with any applicable general plan, specific plan or local coastal program; community-level environmental review has not been adopted or certified; existing utilities are not adequate to serve the project; the site is on a list of hazardous materials sites; the project would impact historical resources; or is in a hazards area.

In contrast, the Ordinance provides for an exemption for PSH projects, by adding the following language to Article 6.1 – Review of Development Projects, Section 16.05D – Exemptions,⁹ via Section 4 of the Ordinance:

Section 4. Subdivision 8 of Subsection D of Section 16.05 of the Los Angeles Municipal Code is added to read as follows:

8. A Qualified Permanent Supportive Housing Project developed pursuant to Section 14.00 A.11 of this Code and containing no more than 120 units, or no more than 200 units if it is located in the Greater Downtown Housing Incentive Area.¹⁰

The Ordinance thus allows for exemption of PSH projects with a larger number of units than would be allowed under existing CEQA exemptions. This change to existing CEQA exemptions, to create a less restrictive exemption for PSH projects is a discretionary action subject to CEQA review.

Please verify that under Section 4, PSH projects with more than 120 units outside of the Greater Downtown Housing Incentive Area would still be subject to CEQA. Please discuss how the threshold levels of 120 outside Downtown and 200 in Downtown were selected. If the Ordinance creates an exemption for a higher number of units than provided for under CEQA, it must be demonstrated that no significant impacts would occur.

In addressing whether it is appropriate to increase the size of the low-income housing (i.e. PSH) projects eligible for an exemption, the environmental document for the Ordinance should

⁶ See also CEQA Guidelines Section 15192.

⁷ See also CEQA Guidelines Section 15194.

⁸ CEQA (Public Resources Code) 21159.23(c).

⁹ Section 16.05D states: “Unless made discretionary by any other provision of law, the approval of any building permit for a development project which does not exceed the thresholds set forth in this subsection and Section 12.24U14 is ministerial and exempt from the requirements of the California Environmental Quality Act.

¹⁰ Page 9, Draft Ordinance 8/30/2017.

address the fact that the Minnesota Housing Finance Agency's Research and Evaluation Unit in their review of housing studies found:¹¹

Impact on Neighborhood Crime

Research on the relationship between affordable housing and crime identifies project scale as the most important factor in determining the impact on neighborhood crime rates. Multiple studies find that smaller projects (typically less than 50 units) have no impact on neighborhood crime, but that larger projects may result in increased crime. This finding was common across multiple types of affordable housing, including non-profit rental housing, public housing, and supportive housing.

Although Section 4's new CEQA exemption limits the size of PSH projects exempted from CEQA, Section 2 (11b) of the Ordinance also provides that:

The (Permanent Supportive Housing) application shall be approved by the Director of Planning through a ministerial Public Benefit process if the eligibility criteria and performance standards of this subsection are met.

As written, it is unclear whether Section 2(11b) would apply only to PSH projects "containing no more than 120 units, or no more than 200 units if it is located in the Greater Downtown Housing Incentive Area" per Section 4, or to all PSH projects. Do the size limits in Section 4 constitute "eligibility criteria"? This needs to be clarified. Please provide information on the correct reading of the two sections and the nature of limitations on PSH projects that would be exempted from CEQA under the Ordinance. Pursuant to PRC Section 21159.23, no exemption should every be granted if there is a reasonable possibility that the project would have a significant effect on the environment or the residents of the project due to unusual circumstances or due to the related or cumulative impacts of reasonably foreseeable projects in the vicinity of the project.

In addition to increasing the size of a low income housing project exempt from CEQA, as written, the Ordinance allows for automatic rezoning for Permanent Supportive Housing and deems the approval of any such housing project a ministerial act, thus exempting it from CEQA analysis, even though PSH projects are likely to fall within the definition of a discretionary approval pursuant to LAMC Section 16.05 B.2(a). The Notice fails to disclose this important aspect of the proposed Ordinance.

The City is thus appears to be considering approval of an Ordinance that increases the size of low income housing project eligible for an exemption and provides for a new automatic rezoning process for PSH projects in the PF Zone without conducting the required CEQA review, for either the Ordinance or requiring CEQA review at the project level. This is unacceptable and is contrary to CEQA. The City is required to comply with CEQA prior to consideration of the Ordinance. Failure to do so deprives decision-makers and the public of important information regarding both the details and implications of the Ordinance and its potential environmental impacts.

Inadequate Notice - Inadequate Project Description

¹¹ Discussion Paper, Impact of Affordable Housing on Communities and Households, Minenesota Housing Finance Agency, page 4.

Number and Location of PSH Developments - No information is provided in the Notice, or the non-existent CEQA document regarding the number and likely location of parcels zoned PF that may be automatically rezoned under the Ordinance to provide for Permanent Supportive Housing (PSH). This information is necessary in order to understand the details and implications of the Ordinance and its potential environmental impacts.

In addition, little information is provided on the likely locations of the Permanent Supportive Housing that the City seeks to have constructed in other zones throughout the City. This information is necessary in order to understand the details and implications of the Ordinance and its potential environmental impacts.

The Notice fails to disclose that the City has already issued a Request for Qualifications/Proposals (RFP) for the Affordable Housing Opportunity Sites.¹² The RFP identifies eight potential sites for permanent supportive housing and other types of affordable housing on City-owned land. Are there any other sites within the City anticipated to be used for Permanent Supportive Housing? Please provide information on potential sites as part of the environmental review of the Ordinance.

The following table summarized the information provided about those sites in the RFP:

SITES FOR PERMANENT SUPPORTIVE HOUSING AND OTHER TYPES OF AFFORDABLE HOUSING ON CITY-OWNED LAND IDENTIFIED IN CITY'S RFP			
LOT	PROPERTY IS ZONED	PARCEL SIZE IS APPROXIMATELY	NOTES
Lincoln Heights DOT Lot Number 697 2332-2340 N. Workman Street APN: 5204-016-901	[Q]C4-1XL-CDO RAS3-1VL-CDO	6,600 s.f.	One of five non-contiguous lots located behind North Broadway commercial storefronts. If a development strategy incorporates all of the Lincoln Heights DOT lots, replacement parking for all of the lots must be included.
Lincoln Heights DOT Lot Number 658 216-224 S. Avenue 24 APN: 5204-005-901	PF-1-CD0 RAS3-1VL-CDO	19,379 s.f.	One of five non-contiguous lots located behind North Broadway commercial storefronts. Replacement public parking does not need to be assumed in the development submission for a single Lincoln Heights DOT lot, though it may be incorporated as

¹² Submission deadline: September 15, 2016. Available at: <http://cao.lacity.org/AHOSRFQ.PDF>

SITES FOR PERMANENT SUPPORTIVE HOUSING AND OTHER TYPES OF AFFORDABLE HOUSING ON CITY-OWNED LAND IDENTIFIED IN CITY'S RFP			
LOT	PROPERTY IS ZONED	PARCEL SIZE IS APPROXIMATELY	NOTES
			part of the eventual project.
Lincoln Heights DOT Lot Lot Number 659 2331-2337 N. Workman Street and 2332-2338 N. Daly APN: 5204-011-903	PF-1-CD0 RAS3-1VL-CDO	37,200 s.f.	One of five non-contiguous lots located behind North Broadway commercial storefronts.
Lincoln Heights DOT Lot Lot Number 661 2416-2422 N. Workman Street APN: 5204-015-901	PF-1-CD0 RAS3-1VL-CDO	16,502 s.f.	One of five non-contiguous lots located behind North Broadway commercial storefronts.
Lincoln Heights DOT Lot Lot Number 660 154 -164 S. Avenue 24 APN: 5204-004-901	PF-1-CD0 RAS3-1VL-CDO	20,295 s.f.	One of five non-contiguous lots located behind North Broadway commercial storefronts.
Hillside Parcel 11681 W. Foothill Blvd, Sylmar APN: 2530-008-901	(T)RD2-1	132,095 s.f.	
Imperial Lot 283 W. Imperial Highway APN: 6074-024-900	C2-1	17,385 s.f.	
Thatcher Yard 3233 S. Thatcher Ave APN: 4229-002-901	(Q) PF-1XL RD1.5	93,347 s.f.	A Coastal Development Permit from the City of Los Angeles will be required, and Coastal Commission approval may be required on appeal.
Old West L.A. Animal Shelter 11950 Missouri Ave APN: 4259-020-900	PF-1-XL and M2-1 R3	32,642 s.f.	
Old Fire Station #5 6621 W. Manchester Ave	R1-1 R3	19,507 s.f.	Improved with an abandoned fire station.

SITES FOR PERMANENT SUPPORTIVE HOUSING AND OTHER TYPES OF AFFORDABLE HOUSING ON CITY-OWNED LAND IDENTIFIED IN CITY'S RFP			
LOT	PROPERTY IS ZONED POTENTIAL FUTURE ZONING IS	PARCEL SIZE IS APPROXIMATELY	NOTES
APN: 4112-029-900			
Venice Dell Pacific Site 125 E Venice Blvd. APN: 4238-024-900 to 911	OS-1SL-O R3	122,171 s.f.	Developments must comply with the Venice Specific Plan. A Coastal Development Permit from the City of Los Angeles will be required, and approval from the California Coastal Commission will also be required.
Old Fire Station #53 438 N. Mesa Street APN: 7449-009-900	R2-1X	8,990 s.f.	The property is improved with an abandoned fire station.
Source: http://cao.lacity.org/AHOSRFQ.PDF			

Please provide information on the number of units that could potentially be developed on each of these sites under the Ordinance with an explanation of how the number was calculated and Ordinance provisions were applied.

According to the RFT, two of the sites, Thatcher Yard and the Venice Dell Pacific Site, require a Coastal Development Permit. Under Section 16.05 B.2 of the LAMC, preparation of an environmental document is required for this type of “discretionary” permit. However, proposed Section 2(11b) of the Ordinance would exempt the eight sites from environmental review. Pursuant to CEQA Guidelines Section 15268(d):

Where a project involves an approval that contains elements of both a ministerial action and a discretionary action, the project will be deemed to be discretionary and will be subject to the requirements of CEQA.

At a minimum, project level environmental review will be required for a PSH project on either the Thatcher Yard or Venice Dell Pacific Site. The Ordinance should be amended to require compliance with CEQA Guidelines Section 15268(d).

Concession and Incentives - Increased Density, Height etc. - Section 2, 11 – Permanent Supportive Housing (d – Zoning Compliance) states that (emphasis added):

(1) Minimum Lot Area per Dwelling Unit or Guest Room. In zones where multiple dwelling uses are permitted (R3 and less restrictive), the number of allowable dwelling units or guest rooms shall not be subject to the otherwise maximum allowable residential density under any applicable zoning ordinance and/or specific plan. In the RD1.5 Zone, the minimum lot area per dwelling unit or guest room shall be 500 square feet. **All applicable standards pertaining to**

height and floor area under any applicable zoning ordinance and/or specific plan or overlay shall apply.

However, Section 2, 11 – Permanent Supportive Housing (e - Additional Concessions or Incentives) states (emphasis added):

(d) Zoning Compliance. A Qualified Permanent Supportive Housing Project meeting the requirements in Paragraph (c) and the performance standards in Paragraph (g) must comply with all objective requirements in any applicable zoning code, specific plan or overlay district regulations **except**:

Section 2,11(d) then provides for a PSH project to obtain up to four concessions or incentives, from a list that includes: decreased yard/setback requirements; increased lot coverage limits; increased floor area ratio; increase height; decreased open space, averaging floor area ratio; parking or open space across two or more contiguous parcels.

Section 2,11(d)'s statement that "All applicable standards pertaining to height and floor area under any applicable zoning ordinance and/or specific plan or overlay shall apply," appears contradicted by Section 2,11(e). Please explain how this apparent contradiction would be resolved by providing examples of PSH projects in several zones, as they would look under existing zoning, as compared to under the Ordinance. It is important for the environmental document for the Ordinance to address consistency of the Ordinance with existing area plans and design guidelines.

Inadequate Requirements for the Provision Of Supportive Services

Although the Ordinance requires that PSH projects record a covenant acceptable to the Housing and Community Investment Department (HCIDLA) that reserves and maintains the number of dwelling units designated as restricted affordable for at least 55 years from the issuance of the Certificate of Occupancy, it does not appear that the Ordinance similarly requires the provision of supportive services on an on-going basis for the life of the project, or provides a mechanism to ensure that supportive services are being provided consistently over the life of the project and that they are adequate for the needs of a PSH project's target population. In addition, the Ordinance does not establish minimum required levels of support services to be provided at each PSH.

Whereas PSH projects are generally not associated with an increase in crime and a decrease in property values¹³, the same is not true for shelters or public housing projects that do

¹³ There is some evidence, however, that PSH facilities may lead to a decrease in property values when located in higher income areas. According to "The Impacts of Supportive Housing on Neighborhoods and Neighbors, The Urban Institute (October 1999), George Galster et al, page xii:

While the *average* relationship between this set of supportive housing facilities and proximate house prices was positive, not all site/neighborhood combinations in Denver experienced the same relationship. When we disaggregated our analysis to measure impacts for different common clusters of sites/neighborhoods, we found that the set of five supportive housing sites located in low-valued, heavily minority-occupied (typically majority Black-occupied) neighborhoods consistently evinced the positive price impacts noted above. By contrast, the site in the highest-value, overwhelmingly white-occupied neighborhood apparently had a *negative* effect on house prices, as did another (poorly maintained) site in a modestly valued, high-density core neighborhood having 24 percent of its population classified as Hispanic.

not provide supportive services for the target populations specified in Section 2, 11(a)(2) – Target Population of the Ordinance, or for poorly managed or maintained facilities.¹⁴ The nature and quality of the supportive services are important to ensuring surrounding neighborhoods will not experience an increase in crime or decrease in property values.

Issues to Address in the Environmental Analysis of the Proposed Ordinance

In addition to addressing the impact on the Ordinance on consistency with existing area plans and regulations, as well as the other CEQA Checklist issue areas, the environmental document for the Ordinance should address:

Growth Inducing Impacts - Recent research has indicated the potential for the construction of PSH to induce in-migration of additional homeless into a Continuum of Care (CoC) area¹⁵ or inhibit out-migration of homeless. As explained by Corinth:

One potentially important factor that could affect estimates of associations between PSH and homelessness is migration. A CoC that expands its inventory may experience an inflow of homeless people seeking services or a reduced outflow of homeless people to other CoCs.¹⁶

Between 2007 and 2014, communities across the United States rapidly expanded the inventory of PSH beds for homeless individuals with disabling conditions. . . I find that each additional PSH bed was associated with between 0.04 and 0.12 fewer homeless people after one year. Causal effects identified on the basis of lagged funding decisions imply that one additional PSH bed reduces homeless counts by up to 0.10 people. Effect sizes of greater than 0.72 can be rejected at the 95% confidence level, ruling out the simple reasoning that adding one unit of housing reduces homelessness by one person. Relatively modest effects may be explained by some combination of poor targeting, differential exit rates into private housing from PSH relative to homelessness, incentives for remaining homeless, errors in homeless counts, and migration in response to expanded PSH. Indeed, PSH expansion in the rest of a state is associated with significant reductions in homeless counts within a community, consistent with homeless migration in response to PSH expansion.¹⁷

¹⁴ Ibid, page xiv:

Our central finding—that supportive housing generally has a positive impact on neighborhoods when done at a small scale, but that poorly managed properties can be deleterious to neighborhoods—implies that public policy would do well to encourage both public education and high-quality operation in the realm of supportive housing. Our findings also strongly suggest that the public sector pay strict attention to the ongoing operation, tenant management, and physical maintenance of supportive housing facilities.

¹⁵ A Continuum of Care (CoC) is a regional or local planning body that coordinates housing and services funding for homeless families and individuals. There are 414 CoCs in the United States. The Los Angeles CoC covers the Los Angeles County area, but excludes the cities of Glendale, Pasadena and Long Beach.

¹⁶ Corinth, Kevin. “The Impact of Permanent Supportive Housing on Homeless Populations.” *Journal of Housing Economics* 35 (2017) 69-84. Page 75. Available at: https://ac.els-cdn.com/S1051137715300474/1-s2.0-S1051137715300474-main.pdf?_tid=0cedc104-ba9c-11e7-a99d-00000aacb35f&acdnat=1509056685_fceb158ca8e69a34586fd1d9d46ba052

¹⁷ Corinth, Kevin. “The Impact of Permanent Supportive Housing on Homeless Populations.” *Journal of Housing Economics* 35 (2017) 69-84. Page 80.

The environmental analysis for the proposed Ordinance should therefore address the growth-inducing impacts of the proposed Ordinance.

Cumulative Impacts – The PSH Ordinance is not the only ordinance currently under consideration by the City to address homelessness. The City is concurrently considering an Interim Motel Conversion Ordinance (CPC-2017-3409-CA; ENV-2017-3410-ND). Although the case numbers for the Motel Conversion appear to indicate that a Negative Declaration has been prepared for the Motel Conversion Ordinance, the Negative Declaration does not appear to be available on the City’s website. The environmental document for the PSH Ordinance should include the cumulative projects resulting from the Motel Conversion Ordinance and should address the potential cumulative impacts associated with the City’s full Comprehensive Homeless Strategy.

Increase in Water Demand - According to page 1 of the Background and Frequently Asked Questions portion of the Notice:

According to the City’s Comprehensive Homeless Strategy, a total of 1,000 PSH units need to be constructed annually to house the City’s homeless population – a significant increase from the current annual supply of 300 units. To help meet these goals, the Los Angeles electorate adopted Measure HHH in November 2016, a voter initiative that will create \$1.2 billion in new funding over the next decade to construct PSH units. The voters also adopted Measure H in March 2017, a County-wide measure that will provide ongoing funding to support rent subsidies and services for PSH, among other homeless services.

It thus appears the City is seeking to increase the production of PSH by 700 units per year. CEQA Guidelines Section 15155 requires the City to consult with the applicable water agency for any water-demand project, including residential development of more than 500 units, as part of the preparation of the environmental document for the project (in this case the Ordinance). Given that the intent of the Ordinance is to increase the production of PSH, with a goal of at least an additional 700 units per year, as part of the preparation of the environmental document for the Ordinance, the City should consult with the applicable water agency to determine if the intended effects of the Ordinance were included in the most recently adopted urban water management plan and to prepare a water assessment approved at a regular or special meeting of that governing body.

The Ordinance Needs to Be Amended

The Ordinance needs to be amended to:

- Remove the new CEQA exemption for PSH projects; instead the existing CEQA low-income housing exemption should be applied.
- Include language in the Ordinance to make clear that pursuant to CEQA Guidelines Section 15268(d) where a PSH project “involves an approval that contains elements of both a ministerial action and a discretionary action, the project will be deemed to be discretionary and will be subject to the requirements of CEQA.”

- Allow for automatic rezoning of only those parcels addressed in the environmental document for the proposed Ordinance, or specifically addressed in the environmental document for the applicable area plan.
- Add requirements for provision of an appropriate level of supportive services to be maintained over the life of individual PSH projects.

Conclusion

Thank you in advance for your thoughtful consideration of these issues of concern. I may be contacted at 310-982-1760 or at jamie.hall@channellawgroup.com if you have any questions, comments or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Jamie T. Hall". The signature is fluid and cursive, with the first name "Jamie" being the most prominent part.

Jamie T. Hall

ATTACHMENTS:

1. Page showing CEQA Timeline presented at City's informational meeting on the PSH Ordinance

cc: Councilman Mike Bonin
City Attorney Mike Feuer
Members of Los Angeles City Council

Project Timeline

		Preparation of CEQA Document		Public Hearings
	Initial Outreach	Public Comment Period		
Project Launch	Identify Draft Ordinance Concepts	Release Draft Ordinance	City Planning Commission	City Council Adoption
Summer 2016	Fall 2016 – Spring 2017	Summer 2017	Fall 2017	Winter 2017-18

October 30, 2017

*Deadline to submit public comment to
cally.hardy@lacity.org*



Attachments To The
Channel Law Comments On The Environmental Documentation For, And The,
Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And
Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd
(APN 4238-024-900 To 911)
December 20, 2017

Attachment 2
Planning Commission Letter of Determination Regarding the PSH
Ordinance and Associated CEQA Documents and the Planning
Commission Meeting Audio Links for the December 14, 2017 Hearing,
See Item 12.



LOS ANGELES CITY PLANNING COMMISSION

200 North Spring Street, Room 532, Los Angeles, California, 90012-4801, (213) 978-1300

www.planning.lacity.org

LETTER OF DETERMINATION

MAILING DATE: DEC 19 2017

Case No.: CPC-2017-3136-CA

Council Districts: All

CEQA: ENV-2017-3137-MND

SCAG 2016-2040 RTP/SCS PEIR (SCH No. 2015031035)

Plan Areas: All

Project Site: Citywide

Applicant: City of Los Angeles
Representative: Cally Hardy, Planning Assistant

At its meeting of **December 14, 2017**, the Los Angeles City Planning Commission took the actions below in conjunction with the approval of the proposed ordinance:

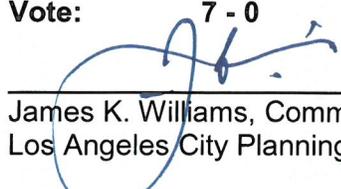
An ordinance amending Sections 12.03, 12.04.09, 14.00, and 16.05 of the Los Angeles Municipal Code establishing regulations to facilitate the production of Permanent Supportive Housing.

1. **Found** pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including Mitigated Negative Declaration No. ENV-2017-3137-MND (Mitigated Negative Declaration), and all comments received, with imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; **Found** that the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; **Found** the mitigation measures have been made enforceable conditions on the project; and adopt the Mitigated Negative Declaration; and **Adopted** the Mitigated Negative Declaration and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;
2. **Approve** and **recommend** that the City Council **find**, based on their independent judgement, after consideration of the whole of the administrative record, including the SCAG 2016-2040 RTP/SCS PEIR (SCH No. 2015031035), certified on April 7, 2016 (EIR) and the Addendum prepared for the PSH Ordinance (Addendum), the project was assessed in the EIR and pursuant to the CEQA Guidelines, Sections 15162 and 15164 and the Addendum that no major revisions to the EIR are required and no subsequent EIR, or negative declaration is required for approval of the project;
3. **Adopted** the staff report as the Commission report on the subject;
4. **Approved** and **recommended** that the City Council **adopt** the proposed ordinance, as amended by the Commission, subject to review by the City Attorney as to form and legality; and
5. **Adopted** and **recommended** that the City Council **adopt** the attached Findings.

The vote proceeded as follows:

Moved: Ambroz
Second: Khorsand
Ayes: Choe, Dake Wilson, Millman, Padilla Campos, Perlman
Absent: Mitchell, Mack

Vote: 7 - 0



James K. Williams, Commission Executive Assistant II
Los Angeles City Planning Commission

Effective Date/Appeals: The decision of the Los Angeles City Planning Commission is final and not appealable.

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

Attachments: Ordinance, Findings

c: Ken Bernstein, Principal Planner
Arthi Varma, Principal City Planner
Claire Bowin, Senior City Planner
Matthew Glesne, City Planner
Cally Hardy, Planning Assistant

COMMISSION MEETING AUDIO

CITY PLANNING COMMISSION
REGULAR MEETING AGENDA
THURSDAY, DECEMBER 14, 2017 after 8:30 a.m.
LOS ANGELES CITY HALL, COUNCIL CHAMBERS ROOM 340
200 NORTH SPRING STREET, LOS ANGELES, CALIFORNIA 90012

CLICK ON THE [BLUE](#) LINKS BELOW TO LISTEN TO AUDIO FROM THE MEETING

**TO REQUEST A COPY ON COMPACT DISC,
PLEASE CONTACT THE DEPARTMENT OF CITY PLANNING PUBLICATIONS AT (213) 978-1255**

1. [**DIRECTOR'S REPORT**](#)

- Update on City Planning Commission Status Reports and Active Assignments
- Legal actions and issues update
- Other Items of Interest

2. [**COMMISSION BUSINESS**](#)

- Advance Calendar
- Commission Requests
- Minutes of Meeting – November 9, 2017; November 16, 2017

3. [**NEIGHBORHOOD COUNCIL PRESENTATION**](#)

Presentation by Neighborhood Council representatives on any Neighborhood Council resolution, or community impact statement filed with the City Clerk, which relates to any agenda item listed or being considered on this agenda. The Neighborhood Council representative shall provide the Board or Commission with a copy of the Neighborhood Council's resolution or community impact statement. THESE PRESENTATIONS WILL BE TAKEN AT THE TIME THE AGENDA ITEM IS CALLED FOR CONSIDERATION.

4. [**GENERAL PUBLIC COMMENT**](#)

The Commission shall provide an opportunity in open meetings for the public to address it **on non-agenda items**, for a cumulative total of up to thirty (30) minutes, on items of interest to the public that are within the subject matter jurisdiction of the Commission.

PERSONS WISHING TO SPEAK MUST SUBMIT A SPEAKER'S REQUEST FORM. ALL REQUESTS TO ADDRESS THE COMMISSION ON **NON-AGENDA ITEMS** AND ITEMS OF INTEREST TO THE PUBLIC THAT ARE WITHIN THE JURISDICTION OF THE COMMISSION MUST BE SUBMITTED PRIOR TO THE COMMENCEMENT OF THE PUBLIC COMMENT PERIOD.

5. **RECONSIDERATIONS**

- 5a. **MOTIONS TO RECONSIDER** - The Commission may make a motion to reconsider a Commission Action on any agenda items from its previous meeting, consistently with the Commission Rule 8.3, provided the Commission retains jurisdiction over the matter.
- 5b. **MERITS OF ANY ITEM THE COMMISSION HAS VOTED TO RECONSIDER** – If a majority of the Commission has approved a motion to reconsider a Commission Action, the Commission may address the merits of the original Commission Action.

6. **CONSENT CALENDAR (None)**

Consent Calendar items are considered to be not controversial and will be treated as one agenda item. The Consent Calendar will be enacted by one motion. There will be no separate discussion of these items unless the item is removed from the Consent Calendar, in which event the item will be considered as time allows on the regular agenda.

- 6a. **CPC-2014-4942-ZC-HD-DB-SPR**
CEQA: ENV-2014-4943-MND
Plan Area: Wilshire

Council District: 1 - Cedillo
Last Day to Act: 12-19-17

PUBLIC HEARING – Completed July 24, 2017

PROJECT SITE: 2501 – 2515 West Olympic Boulevard;
980 – 992 South Arapahoe Street;
981 South Hoover Street

PROPOSED PROJECT:

Construction of a new seven-story, mixed-use development consisting of 173 residential units and 36,990 square feet of commercial uses with a total of 262 on-site vehicle parking spaces (201 spaces for residential uses, 61 spaces for commercial uses) located within one ground floor parking level and two subterranean parking levels, on a Project Site that consists of nine (9) contiguous lots totaling 51,949 square feet in size, and is currently vacant. The building will measure approximately 92 feet in height and contain approximately 183,190 square feet of floor area. As part of this application, the Department of City Planning has initiated a Zone Change and Height District Change from C2-2 to (T)(Q)C2-1 as a technical correction to a recorded mapping error which will create consistency between the Zone designation and the General Plan Land Use designation for the C2 zoned lots.

REQUESTED ACTIONS:

1. Pursuant to CEQA Guidelines Section 15074(b), consideration of the whole of the administrative record, including the Mitigated Negative Declaration, No. ENV-2014-4943-MND (“Mitigated Negative Declaration”), Errata dated November 17, 2017, all comments received, the imposition of mitigation measures and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;

ACTIONS INITIATED BY THE DIRECTOR OF PLANNING:

2. Pursuant to Los Angeles Municipal Code (LAMC) Section 12.32 F, a Zone Change and Height District Change from C2-2 to (T)(Q)C2-1;

ACTIONS REQUESTED BY THE APPLICANT:

3. Pursuant to Section 12.22 A.25(g)(2) a 33 percent Density Bonus for a project reserving 15 percent of the base dwelling units, or 20 units, for Very Low Income Households, in conjunction with Parking Option 1 and the following three (3) On-Menu Incentives:

REQUESTED ACTIONS:

1. Pursuant to CEQA Guidelines, Section 15332, an Exemption from CEQA, and that there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies; and
2. Pursuant to Section 12.22 A.25(g)(3) of the Los Angeles Municipal Code, a 32.5 percent Density Bonus for a project totaling 26 residential dwelling units reserving 10 percent, or two (2) units, for Very Low Income Households, and utilizing parking option 1, with one Off-Menu Incentive to allow a maximum Floor Area Ratio (FAR) of 2.01:1 in lieu of a 1:1, otherwise permitted pursuant to Ordinance No. 173,606 and Section 15.A of the Colorado Boulevard Specific Plan.

Applicant: Imad Boukai, General Procurement
Representative: Heather Lee

Staff: Azeen Khanmalek, City Planning Associate
azeen.khanmalek@lacity.org
(213) 978-1336

****THE FOLLOWING ITEMS WILL BE CONSIDERED AFTER 12:00 PM****

12. [CPC-2017-3136-CA](#)
CEQA: ENV-2017-3137-MND
SCAG 2016-2040 RTP/SCS PEIR (SCH No. 2015031035)
Plan Areas: All

Council Districts: All
Last Day to Act: N/A

PUBLIC HEARING – Completed September 25, 2017 and September 28, 2017

PROJECT AREA: Citywide

PROPOSED ORDINANCE:

An ordinance amending Sections 12.03, 12.04.09, 14.00, and 16.05 of the Los Angeles Municipal Code establishing regulations to facilitate the production of Permanent Supportive Housing.

RECOMMENDED ACTIONS:

1. Pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including Mitigated Negative Declaration No. ENV-2017-3137-MND (Mitigated Negative Declaration), and all comments received, with imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; find the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; find the mitigation measures have been made enforceable conditions on the project; and adopt the Mitigated Negative Declaration;
2. Approve and recommend that the City Council find, based on their independent judgement, after consideration of the whole of the administrative record, including the SCAG 2016-2040 RTP/ SCS PEIR (SCH No. 2015031035), certified on April 7, 2016 (EIR) and the Addendum prepared for the PSH Ordinance (Addendum), the project was assessed in the EIR and pursuant to the CEQA Guidelines, Sections 15162 and 15164 and the Addendum that no major revisions to the EIR are required and no subsequent EIR, or negative declaration is required for approval of the project;
3. Approve and recommend that the City Council adopt the proposed ordinance;
4. Adopt the Staff Report as the Commission Report on the subject; and
5. Adopt the Findings.

Applicant: City of Los Angeles

Staff: Cally Hardy, Planning Assistant
cally.hardy@lacity.org
(213) 978-1643

13. [CPC-2017-3409-CA](#)
CEQA: ENV-2017-4476-CE,
ENV-2017-3410-ND
Plan Areas: All

Council Districts: All
Last Day to Act: N/A

PUBLIC HEARINGS – Completed September 25, 2017 and September 28, 2017

PROJECT AREA: Citywide

PROPOSED ORDINANCE:

An ordinance amending Sections 12.03, 14.00 and 151.02 of the Los Angeles Municipal Code establishing regulations to facilitate the use of existing hotels and motels for Supportive Housing and/or Transitional Housing.

RECOMMENDED ACTIONS:

1. Determine, based on the whole of the administrative record, that the proposed ordinance is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15301, and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines Section 15300.2 applies;
2. Approve and recommend that the City Council find, pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including the Negative Declaration, No. ENV-2017-3410-ND (“Negative Declaration”), and all comments received, there is no substantial evidence that the project will have a significant effect on the environment; find the Negative Declaration reflects the independent judgment and analysis of the City; and adopt the Negative Declaration;
3. Approve and recommend that the City Council adopt the proposed ordinance;
4. Adopt the Staff Report as the Commission Report on the subject; and
5. Adopt the Findings.

Applicant: City of Los Angeles

Staff: Cally Hardy, Planning Assistant
cally.hardy@lacity.org
(213) 978-1643

14. [CPC-2017-4546-CA](#)
CEQA: ENV-2017-3361-SE
Plan Areas: All

Council Districts: All
Last Day to Act: N/A

PUBLIC HEARING REQUIRED

PROJECT AREA: Citywide

PROPOSED ORDINANCE:

An ordinance enacting restrictions on commercial advertising of cannabis, cannabis products, commercial cannabis activity, or businesses engaged in any commercial cannabis activity on signs.

RECOMMENDED ACTIONS:

1. Determine that based on the whole of the administrative record, the project is exempt from CEQA pursuant to California Business and Professions Code Section 26055(h) on the basis that the project will adopt ordinances, rules and/or regulations that will require discretionary review under CEQA to approve licenses to engage in commercial cannabis activity in the City of Los Angeles;
2. Approve and Recommend that the City Council adopt the proposed Ordinance;

3. Adopt the Staff Report as the Commission's Report on the subject; and
4. Adopt the Findings.

Applicant: City of Los Angeles

Staff: Niall Huffman, City Planning Associate
niall.huffman@lacity.org
(213) 978-3405

The next scheduled regular meeting of the City Planning Commission will be held on:

Thursday, December 21, 2017

Van Nuys City Hall
Council Chamber, 2nd Floor
14410 Sylvan Street
Van Nuys, CA 91401

An Equal Employment Opportunity/Affirmative Action Employer

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate. The meeting facility and its parking are wheelchair accessible. Translation services, sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services must be requested **7 days prior to the meeting** by calling the Planning Commission Secretariat at (213) 978-1300 or by email at CPC@lacity.org.

Attachments To The
Channel Law Comments On The Environmental Documentation For, And The,
Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And
Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd
(APN 4238-024-900 To 911)
December 20, 2017

Attachment 3
City of Los Angeles Parcel Profile Reports (ZIMAS Reports) For Two
Parcels In the Coastal Zone.



City of Los Angeles Department of City Planning

12/18/2017 PARCEL PROFILE REPORT

PROPERTY ADDRESSES

125 E VENICE BLVD
125 E SOUTH VENICE BLVD

ZIP CODES

90291

RECENT ACTIVITY

DIR-2008-4703-DI

CASE NUMBERS

CPC-2014-1456-SP
CPC-2005-8252-CA
CPC-2000-4046-CA
CPC-1998-119
CPC-1995-148-GPC-ZC
CPC-1987-648-ICO
CPC-1986-824-GPC
CPC-1984-226-SP
CPC-1972-24385
CPC-17630
ORD-175694
ORD-175693
ORD-172897
ORD-172019
ORD-170998-SA10
ORD-168999
ORD-164844-SA2190
ORD-145252
ORD-130336
DIR-2014-2824-DI
ZA-1992-484-PAD
ENV-2014-1458-EIR
ENV-2005-8253-ND
ENV-2004-2691-CE
ENV-2002-6836-SP
ENV-2001-846-ND
ED-73-307-ZC
AFF-36536

Address/Legal Information

PIN Number	106-5A145 436
Lot/Parcel Area (Calculated)	1,337.0 (sq ft)
Thomas Brothers Grid	PAGE 671 - GRID H6
Assessor Parcel No. (APN)	4238024900
Tract	SHORT LINE BEACH SUBDIVISION NO. 1
Map Reference	M B 2-59
Block	9
Lot	36
Arb (Lot Cut Reference)	1
Map Sheet	106-5A145

Jurisdictional Information

Community Plan Area	Venice
Area Planning Commission	West Los Angeles
Neighborhood Council	Venice
Council District	CD 11 - Mike Bonin
Census Tract #	2739.02
LADBS District Office	West Los Angeles

Planning and Zoning Information

Special Notes	None
Zoning	OS-1XL-O
Zoning Information (ZI)	ZI-2471 Coastal Zone
	ZI-2452 Transit Priority Area in the City of Los Angeles
	ZI-2406 Director's Interpretation of the Venice SP for Small Lot Subdivisio
General Plan Land Use	Open Space
General Plan Note(s)	Yes
Hillside Area (Zoning Code)	No
Specific Plan Area	Los Angeles Coastal Transportation Corridor
Subarea	None
Specific Plan Area	Venice Coastal Zone
Subarea	Venice Canals
Special Land Use / Zoning	None
Design Review Board	No
Historic Preservation Review	No
Historic Preservation Overlay Zone	None
Other Historic Designations	None
Other Historic Survey Information	None
Mills Act Contract	None
CDO: Community Design Overlay	None
CPIO: Community Plan Imp. Overlay	None
Subarea	None
CUGU: Clean Up-Green Up	None
NSO: Neighborhood Stabilization Overlay	No
POD: Pedestrian Oriented Districts	None
SN: Sign District	No
Streetscape	No
Adaptive Reuse Incentive Area	None

This report is subject to the terms and conditions as set forth on the website. For more details, please refer to the terms and conditions at zimas.lacity.org
(*) - APN Area is provided "as is" from the Los Angeles County's Public Works, Flood Control, Benefit Assessment.

Ellis Act Property	No
Rent Stabilization Ordinance (RSO)	No
Transit Oriented Communities (TOC)	Tier 1
CRA - Community Redevelopment Agency	None
Central City Parking	No
Downtown Parking	No
Building Line	None
500 Ft School Zone	No
500 Ft Park Zone	No

Assessor Information

Assessor Parcel No. (APN)	4238024900
APN Area (Co. Public Works)*	0.635 (ac)
Use Code	2700 - Commercial - Parking Lot (Commercial Use Property) - Lots - Patron or Employee - One Story
Assessed Land Val.	\$230,543
Assessed Improvement Val.	\$0
Last Owner Change	12/12/1960
Last Sale Amount	\$0
Tax Rate Area	67
Deed Ref No. (City Clerk)	1-792
Building 1	No data for building 1
Building 2	No data for building 2
Building 3	No data for building 3
Building 4	No data for building 4
Building 5	No data for building 5

Additional Information

Airport Hazard	None
Coastal Zone	Coastal Zone Commission Authority Dual Jurisdictional Coastal Zone
Farmland	Area Not Mapped
Urban Agriculture Incentive Zone	YES
Very High Fire Hazard Severity Zone	No
Fire District No. 1	No
Flood Zone	None
Watercourse	No
Hazardous Waste / Border Zone Properties	No
Methane Hazard Site	Methane Zone
High Wind Velocity Areas	No
Special Grading Area (BOE Basic Grid Map A-13372)	No
Oil Wells	None

Seismic Hazards

Active Fault Near-Source Zone	
Nearest Fault (Distance in km)	5.5738776
Nearest Fault (Name)	Santa Monica Fault
Region	Transverse Ranges and Los Angeles Basin
Fault Type	B
Slip Rate (mm/year)	1.00000000
Slip Geometry	Left Lateral - Reverse - Oblique
Slip Type	Moderately / Poorly Constrained
Down Dip Width (km)	13.00000000
Rupture Top	0.00000000
Rupture Bottom	13.00000000
Dip Angle (degrees)	-75.00000000
Maximum Magnitude	6.60000000

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 (*) - APN Area is provided "as is" from the Los Angeles County's Public Works, Flood Control, Benefit Assessment.

Alquist-Priolo Fault Zone	No
Landslide	No
Liquefaction	Yes
Preliminary Fault Rupture Study Area	No
Tsunami Inundation Zone	Yes

Economic Development Areas

Business Improvement District	VENICE BEACH
Promise Zone	None
Renewal Community	No
Revitalization Zone	None
State Enterprise Zone	None
Targeted Neighborhood Initiative	None

Public Safety

Police Information

Bureau	West
Division / Station	Pacific
Reporting District	1441

Fire Information

Bureau	West
Batallion	4
District / Fire Station	63
Red Flag Restricted Parking	No

CASE SUMMARIES

Note: Information for case summaries is retrieved from the Planning Department's Plan Case Tracking System (PCTS) database.

Case Number:	CPC-2014-1456-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	SPECIFIC PLAN AMENDMENT
Case Number:	CPC-2005-8252-CA
Required Action(s):	CA-CODE AMENDMENT
Project Descriptions(s):	AN ORDINANCE ESTABLISHING PERMANENT REGULATIONS IMPLEMENTING THE MELLO ACT IN THE COASTAL ZONE.
Case Number:	CPC-2000-4046-CA
Required Action(s):	CA-CODE AMENDMENT
Project Descriptions(s):	
Case Number:	CPC-1998-119
Required Action(s):	Data Not Available
Project Descriptions(s):	
Case Number:	CPC-1995-148-GPC-ZC
Required Action(s):	GPC-GENERAL PLAN/ZONING CONSISTENCY (AB283) ZC-ZONE CHANGE
Project Descriptions(s):	Data Not Available
Case Number:	CPC-1987-648-ICO
Required Action(s):	ICO-INTERIM CONTROL ORDINANCE
Project Descriptions(s):	INTERIM CONTROL ORDINANCE FOR THE ENTIRE VENICE COASTAL ZONE WHICH WILL TEMPORARILY PERMIT ONLY BUILDING DEVELOPMENT WHICH IS IN CONFORMANCE WITH REGULATIONS SUBSTANTIALLY BASED ON THE CALIFORNIA COASTAL COMMISSIONS INTERPRETIVE GUIDELINES FOR THE AREA
Case Number:	CPC-1986-824-GPC
Required Action(s):	GPC-GENERAL PLAN/ZONING CONSISTENCY (AB283)
Project Descriptions(s):	
Case Number:	CPC-1984-226-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	Data Not Available
Case Number:	CPC-1972-24385
Required Action(s):	Data Not Available
Project Descriptions(s):	
Case Number:	DIR-2014-2824-DI
Required Action(s):	DI-DIRECTOR OF PLANNING INTERPRETATION
Project Descriptions(s):	DIRECTOR'S INTERPRETATION OF A SPECIFIC PLAN PURSUANT TO LAMC SECTION 11.5.7.H. THE INTERPRETATION SHALL ONLY BE APPLICABLE TO THE VENICE COASTAL SPECIFIC PLAN.
Case Number:	ZA-1992-484-PAD
Required Action(s):	PAD-PLAN APPROVAL ONLY FOR A DEEMED-TO-BE-APPROVED CU
Project Descriptions(s):	THE CITY PROPOSES TO MAINTAIN THE SITE AS A PUBLIC MUNICIPAL PARKING LOT.
Case Number:	ENV-2014-1458-EIR
Required Action(s):	EIR-ENVIRONMENTAL IMPACT REPORT
Project Descriptions(s):	ENVIRONMENTAL IMPACT REPORT
Case Number:	ENV-2005-8253-ND
Required Action(s):	ND-NEGATIVE DECLARATION
Project Descriptions(s):	AN ORDINANCE ESTABLISHING PERMANENT REGULATIONS IMPLEMENTING THE MELLO ACT IN THE COASTAL ZONE.
Case Number:	ENV-2004-2691-CE
Required Action(s):	CE-CATEGORICAL EXEMPTION
Project Descriptions(s):	SMALL LOT/TOWNHOME ORDINANCE
Case Number:	ENV-2002-6836-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	VENICE COASTAL SPECIFIC PLAN AMENDMENT prepared and adopted by the City Planning Dept. in accordance with the Coastal Act provisions and guidelines.
Case Number:	ENV-2001-846-ND
Required Action(s):	ND-NEGATIVE DECLARATION
Project Descriptions(s):	
Case Number:	ED-73-307-ZC

This report is subject to the terms and conditions as set forth on the website. For more details, please refer to the terms and conditions at zimas.lacity.org
(*) - APN Area is provided "as is" from the Los Angeles County's Public Works, Flood Control, Benefit Assessment.

Required Action(s): ZC-ZONE CHANGE

Project Descriptions(s): Data Not Available

DATA NOT AVAILABLE

CPC-17630

ORD-175694

ORD-175693

ORD-172897

ORD-172019

ORD-170998-SA10

ORD-168999

ORD-164844-SA2190

ORD-145252

ORD-130336

AFF-36536



0.02 Miles
80 Feet

Address: 125 E VENICE BLVD

Tract: SHORT LINE BEACH
SUBDIVISION NO. 1

Zoning: OS-1XL-O

APN: 4238024900

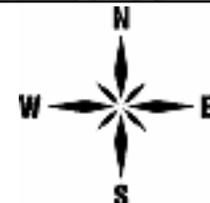
Block: 9

General Plan: Open Space

PIN #: 106-5A145 436

Lot: 36

Arb: 1



LEGEND

GENERALIZED ZONING

-  OS, GW
-  A, RA
-  RE, RS, R1, RU, RZ, RW1
-  R2, RD, RMP, RW2, R3, RAS, R4, R5
-  CR, C1, C1.5, C2, C4, C5, CW, ADP, LASED, CEC, USC, PVSP, PPSP
-  CM, MR, WC, CCS, UV, UI, UC, M1, M2, LAX, M3, SL
-  P, PB
-  PF

GENERAL PLAN LAND USE

LAND USE

RESIDENTIAL

-  Minimum Residential
-  Very Low / Very Low I Residential
-  Very Low II Residential
-  Low / Low I Residential
-  Low II Residential
-  Low Medium / Low Medium I Residential
-  Low Medium II Residential
-  Medium Residential
-  High Medium Residential
-  High Density Residential
-  Very High Medium Residential

COMMERCIAL

-  Limited Commercial
-  Limited Commercial - Mixed Medium Residential
-  Highway Oriented Commercial
-  Highway Oriented and Limited Commercial
-  Highway Oriented Commercial - Mixed Medium Residential
-  Neighborhood Office Commercial
-  Community Commercial
-  Community Commercial - Mixed High Residential
-  Regional Center Commercial

FRAMEWORK

COMMERCIAL

-  Neighborhood Commercial
-  General Commercial
-  Community Commercial
-  Regional Mixed Commercial

INDUSTRIAL

-  Commercial Manufacturing
-  Limited Manufacturing
-  Light Manufacturing
-  Heavy Manufacturing
-  Hybrid Industrial

PARKING

-  Parking Buffer

PORT OF LOS ANGELES

-  General / Bulk Cargo - Non Hazardous (Industrial / Commercial)
-  General / Bulk Cargo - Hazard
-  Commercial Fishing
-  Recreation and Commercial
-  Intermodal Container Transfer Facility Site

LOS ANGELES INTERNATIONAL AIRPORT

-  Airport Landside / Airport Landside Support
-  Airport Airside
-  LAX Airport Northside

OPEN SPACE / PUBLIC FACILITIES

-  Open Space
-  Public / Open Space
-  Public / Quasi-Public Open Space
-  Other Public Open Space
-  Public Facilities

INDUSTRIAL

-  Limited Industrial
-  Light Industrial

CIRCULATION

STREET

-  Arterial Mountain Road
-  Collector Scenic Street
-  Collector Street
-  Collector Street (Hillside)
-  Collector Street (Modified)
-  Collector Street (Proposed)
-  Country Road
-  Divided Major Highway II
-  Divided Secondary Scenic Highway
-  Local Scenic Road
-  Local Street
-  Major Highway (Modified)
-  Major Highway I
-  Major Highway II
-  Major Highway II (Modified)

-  Major Scenic Highway
-  Major Scenic Highway (Modified)
-  Major Scenic Highway II
-  Mountain Collector Street
-  Park Road
-  Parkway
-  Principal Major Highway
-  Private Street
-  Scenic Divided Major Highway II
-  Scenic Park
-  Scenic Parkway
-  Secondary Highway
-  Secondary Highway (Modified)
-  Secondary Scenic Highway
-  Special Collector Street
-  Super Major Highway

FREEWAYS

-  Freeway
-  Interchange
-  On-Ramp / Off- Ramp
-  Railroad
-  Scenic Freeway Highway

MISC. LINES

-  Airport Boundary
-  Bus Line
-  Coastal Zone Boundary
-  Coastline Boundary
-  Collector Scenic Street (Proposed)
-  Commercial Areas
-  Commercial Center
-  Community Redevelopment Project Area
-  Country Road
-  DWP Power Lines
-  Desirable Open Space
-  Detached Single Family House
-  Endangered Ridgeline
-  Equestrian and/or Hiking Trail
-  Hiking Trail
-  Historical Preservation
-  Horsekeeping Area
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-  Multi-Purpose Trail
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-  Park Road (Proposed)
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-  Residential Planned Development
-  Scenic Highway (Obsolete)
-  Secondary Scenic Controls
-  Secondary Scenic Highway (Proposed)
-  Site Boundary
-  Southern California Edison Power
-  Special Study Area
-  Specific Plan Area
-  Stagecoach Line
-  Wildlife Corridor

POINTS OF INTEREST

 Alternative Youth Hostel (Proposed)	 Horticultural Center	 Public Elementary School
 Animal Shelter	 Hospital	 Public Elementary School (Proposed)
 Area Library	 Hospital (Proposed)	 Public Golf Course
 Area Library (Proposed)	HW House of Worship	 Public Golf Course (Proposed)
 Bridge	e Important Ecological Area	 Public Housing
 Campground	 Important Ecological Area (Proposed)	 Public Housing (Proposed Expansion)
 Campground (Proposed)	 Interpretive Center (Proposed)	 Public Junior High School
 Cemetery	 Junior College	 Public Junior High School (Proposed)
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 City Hall	 MTA Station	 Public Senior High School
 Community Center	 MTA Stop	 Public Senior High School (Proposed)
 Community Library	MWD MWD Headquarters	 Pumping Station
 Community Library (Proposed Expansion)	 Maintenance Yard	 Pumping Station (Proposed)
 Community Library (Proposed)	 Municipal Office Building	 Refuse Collection Center
 Community Park	P Municipal Parking lot	 Regional Library
 Community Park (Proposed Expansion)	 Neighborhood Park	 Regional Library (Proposed Expansion)
 Community Park (Proposed)	 Neighborhood Park (Proposed Expansion)	 Regional Library (Proposed)
 Community Transit Center	 Neighborhood Park (Proposed)	 Regional Park
 Convalescent Hospital	 Oil Collection Center	 Regional Park (Proposed)
 Correctional Facility	 Parking Enforcement	RPD Residential Plan Development
 Cultural / Historic Site (Proposed)	 Police Headquarters	 Scenic View Site
 Cultural / Historical Site	 Police Station	 Scenic View Site (Proposed)
 Cultural Arts Center	 Police Station (Proposed Expansion)	 School District Headquarters
DMV DMV Office	 Police Station (Proposed)	 School Unspecified Loc/Type (Proposed)
DWP DWP	 Police Training site	 Skill Center
 DWP Pumping Station	PO Post Office	 Social Services
 Equestrian Center	 Power Distribution Station	 Special Feature
 Fire Department Headquarters	 Power Distribution Station (Proposed)	 Special Recreation (a)
 Fire Station	 Power Receiving Station	 Special School Facility
 Fire Station (Proposed Expansion)	 Power Receiving Station (Proposed)	 Special School Facility (Proposed)
 Fire Station (Proposed)	C Private College	 Steam Plant
 Fire Supply & Maintenance	E Private Elementary School	 Surface Mining
 Fire Training Site	 Private Golf Course	 Trail & Assembly Area
 Fireboat Station	 Private Golf Course (Proposed)	 Trail & Assembly Area (Proposed)
 Health Center / Medical Facility	JH Private Junior High School	UTL Utility Yard
 Helistop	PS Private Pre-School	 Water Tank Reservoir
 Historic Monument	 Private Recreation & Cultural Facility	 Wildlife Migration Corridor
 Historical / Cultural Monument	SH Private Senior High School	 Wildlife Preserve Gate
 Horsekeeping Area	SF Private Special School	
 Horsekeeping Area (Proposed)	 Public Elementary (Proposed Expansion)	

SCHOOLS/PARKS WITH 500 FT. BUFFER

-  Existing School/Park Site
-  Planned School/Park Site
-  Inside 500 Ft. Buffer

- | | | |
|---|--|--|
|  Aquatic Facilities |  Other Facilities |  Opportunity School |
|  Beaches |  Park / Recreation Centers |  Charter School |
|  Child Care Centers |  Parks |  Elementary School |
|  Golf Course |  Performing / Visual Arts Centers |  Span School |
|  Historic Sites |  Recreation Centers |  Special Education School |
|  Horticulture/Gardens |  Senior Citizen Centers |  High School |
|  Skate Parks | |  Middle School |

TRANSIT ORIENTED COMMUNITIES (TOC)

- | | |
|--|--|
|  Tier 1 |  Tier 3 |
|  Tier 2 |  Tier 4 |

Note: TOC Tier designation and map layers are for reference purposes only. Eligible projects shall demonstrate compliance with Tier eligibility standards prior to the issuance of any permits or approvals. As transit service changes, eligible TOC Incentive Areas will be updated.

COASTAL ZONE

-  Coastal Zone Commission Authority
-  Calvo Exclusion Area
-  Not in Coastal Zone
-  Dual Jurisdictional Coastal Zone

WAIVER OF DEDICATION OR IMPROVEMENT

-  Waiver of Dedication or Improvement (WDI)
-  Public Work Approval (PWA)

LAMC SECTION 85.02 (VEHICLE DWELLING)

-  No vehicle dwelling anytime
-  No vehicle dwelling overnight between 9:00 PM - 6:00 AM. Must comply with all posted parking restrictions
-  Vehicle dwelling allowed. Must comply with all posted parking restrictions

OTHER SYMBOLS

- | | | |
|---|---|--|
|  Lot Line |  Airport Hazard Zone |  Flood Zone |
|  Tract Line |  Census Tract |  Hazardous Waste |
|  Lot Cut |  Coastal Zone |  High Wind Zone |
|  Easement |  Council District |  Hillside Grading |
|  Zone Boundary |  LADBS District Office |  Historic Preservation Overlay Zone |
|  Building Line |  Downtown Parking |  Specific Plan Area |
|  Lot Split |  Fault Zone |  Very High Fire Hazard Severity Zone |
|  Community Driveway |  Fire District No. 1 |  Oil Wells |
|  Lot Ties |  Tract Map | |
|  Building Outlines 2014 |  Parcel Map | |
| Building Outlines 2008 | | |



City of Los Angeles Department of City Planning

12/18/2017 PARCEL PROFILE REPORT

PROPERTY ADDRESSES

200 E VENICE BLVD
200 E SOUTH VENICE BLVD

ZIP CODES

90291

RECENT ACTIVITY

DIR-2008-4703-DI
ENV-2008-1044

CASE NUMBERS

CPC-2014-1456-SP
CPC-2005-8252-CA
CPC-2000-4046-CA
CPC-1998-119
CPC-1987-648-ICO
CPC-1986-824-GPC
CPC-1984-226-SP
CPC-17630
ORD-175694
ORD-175693
ORD-172897
ORD-172019
ORD-168999
ORD-164844-SA3070
ORD-130336
DIR-2014-2824-DI
ZA-2008-1045-ZAA
ZA-1984-628-SM
ENV-2014-1458-EIR
ENV-2008-1044-CE
ENV-2005-8253-ND
ENV-2004-2691-CE
ENV-2002-6836-SP
ENV-2001-846-ND

Address/Legal Information

PIN Number	106-5A145 440
Lot/Parcel Area (Calculated)	2,991.8 (sq ft)
Thomas Brothers Grid	PAGE 671 - GRID H6
Assessor Parcel No. (APN)	4227003001
Tract	SHORT LINE BEACH SUBDIVISION NO. 1
Map Reference	M B 2-59
Block	13
Lot	1
Arb (Lot Cut Reference)	None
Map Sheet	106-5A145

Jurisdictional Information

Community Plan Area	Venice
Area Planning Commission	West Los Angeles
Neighborhood Council	Venice
Council District	CD 11 - Mike Bonin
Census Tract #	2739.02
LADBS District Office	West Los Angeles

Planning and Zoning Information

Special Notes	None
Zoning	R3-1-O
Zoning Information (ZI)	ZI-2406 Director's Interpretation of the Venice SP for Small Lot Subdivisio
	ZI-2471 Coastal Zone
	ZI-2452 Transit Priority Area in the City of Los Angeles
General Plan Land Use	Medium Residential
General Plan Note(s)	Yes
Hillside Area (Zoning Code)	No
Specific Plan Area	Los Angeles Coastal Transportation Corridor
Subarea	None
Specific Plan Area	Venice Coastal Zone
Subarea	Venice Canals
Special Land Use / Zoning	None
Design Review Board	No
Historic Preservation Review	No
Historic Preservation Overlay Zone	None
Other Historic Designations	None
Other Historic Survey Information	None
Mills Act Contract	None
CDO: Community Design Overlay	None
CPIO: Community Plan Imp. Overlay	None
Subarea	None
CUGU: Clean Up-Green Up	None
NSO: Neighborhood Stabilization Overlay	No
POD: Pedestrian Oriented Districts	None
SN: Sign District	No
Streetscape	No
Adaptive Reuse Incentive Area	None

Rent Stabilization Ordinance (RSO)	No
Transit Oriented Communities (TOC)	Tier 1
CRA - Community Redevelopment Agency	None
Central City Parking	No
Downtown Parking	No
Building Line	None
500 Ft School Zone	No
500 Ft Park Zone	No

Assessor Information

Assessor Parcel No. (APN)	4227003001
APN Area (Co. Public Works)*	0.069 (ac)
Use Code	0101 - Residential - Single Family Residence - Pool
Assessed Land Val.	\$2,246,847
Assessed Improvement Val.	\$1,758,692
Last Owner Change	10/13/2015
Last Sale Amount	\$3,850,038
Tax Rate Area	67
Deed Ref No. (City Clerk)	996965 996964 67795 409258 2404751 2404750 1341496 1289208 1258991
Building 1	
Year Built	1987
Building Class	D10A
Number of Units	1
Number of Bedrooms	2
Number of Bathrooms	3
Building Square Footage	3,735.0 (sq ft)
Building 2	No data for building 2
Building 3	No data for building 3
Building 4	No data for building 4
Building 5	No data for building 5

Additional Information

Airport Hazard	None
Coastal Zone	Coastal Zone Commission Authority Dual Jurisdictional Coastal Zone
Farmland	Area Not Mapped
Urban Agriculture Incentive Zone	YES
Very High Fire Hazard Severity Zone	No
Fire District No. 1	No
Flood Zone	None
Watercourse	No
Hazardous Waste / Border Zone Properties	No
Methane Hazard Site	Methane Zone
High Wind Velocity Areas	No
Special Grading Area (BOE Basic Grid Map A-13372)	No
Oil Wells	None

Seismic Hazards

Nearest Fault (Distance in km)	5.58546
Nearest Fault (Name)	Santa Monica Fault
Region	Transverse Ranges and Los Angeles Basin
Fault Type	B
Slip Rate (mm/year)	1.00000000
Slip Geometry	Left Lateral - Reverse - Oblique
Slip Type	Moderately / Poorly Constrained
Down Dip Width (km)	13.00000000
Rupture Top	0.00000000
Rupture Bottom	13.00000000
Dip Angle (degrees)	-75.00000000
Maximum Magnitude	6.60000000
Alquist-Priolo Fault Zone	No
Landslide	No
Liquefaction	Yes
Preliminary Fault Rupture Study Area	No
Tsunami Inundation Zone	Yes

Economic Development Areas

Business Improvement District	None
Promise Zone	None
Renewal Community	No
Revitalization Zone	None
State Enterprise Zone	None
Targeted Neighborhood Initiative	None

Public Safety

Police Information

Bureau	West
Division / Station	Pacific
Reporting District	1441

Fire Information

Bureau	West
Batallion	4
District / Fire Station	63
Red Flag Restricted Parking	No

Note: Information for case summaries is retrieved from the Planning Department's Plan Case Tracking System (PCTS) database.

Case Number:	CPC-2014-1456-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	SPECIFIC PLAN AMENDMENT
Case Number:	CPC-2005-8252-CA
Required Action(s):	CA-CODE AMENDMENT
Project Descriptions(s):	AN ORDINANCE ESTABLISHING PERMANENT REGULATIONS IMPLEMENTING THE MELLO ACT IN THE COASTAL ZONE.
Case Number:	CPC-2000-4046-CA
Required Action(s):	CA-CODE AMENDMENT
Project Descriptions(s):	
Case Number:	CPC-1998-119
Required Action(s):	Data Not Available
Project Descriptions(s):	
Case Number:	CPC-1987-648-ICO
Required Action(s):	ICO-INTERIM CONTROL ORDINANCE
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Required Action(s):	GPC-GENERAL PLAN/ZONING CONSISTENCY (AB283)
Project Descriptions(s):	
Case Number:	CPC-1984-226-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	Data Not Available
Case Number:	DIR-2014-2824-DI
Required Action(s):	DI-DIRECTOR OF PLANNING INTERPRETATION
Project Descriptions(s):	DIRECTOR'S INTERPRETATION OF A SPECIFIC PLAN PURSUANT TO LAMC SECTION 11.5.7.H. THE INTERPRETATION SHALL ONLY BE APPLICABLE TO THE VENICE COASTAL SPECIFIC PLAN.
Case Number:	ZA-2008-1045-ZAA
Required Action(s):	ZAA-AREA, HEIGHT, YARD, AND BLDG LINE ADJMNTS GT 20% (SLIGHT MODIFICATIONS)
Project Descriptions(s):	AS PER 12.28 - ZONING ADMINISTRATOR'S ADJUSTMENT TO PERMIT A REDUCED FRONT YARD SETBACK OF 5' IN LIEU OF THE MINIMUM 15' REQUIRED (PER SECTION 12.10 C.1).
Case Number:	ZA-1984-628-SM
Required Action(s):	SM-SLIGHT MODIFICATIONS
Project Descriptions(s):	
Case Number:	ENV-2014-1458-EIR
Required Action(s):	EIR-ENVIRONMENTAL IMPACT REPORT
Project Descriptions(s):	ENVIRONMENTAL IMPACT REPORT
Case Number:	ENV-2008-1044-CE
Required Action(s):	CE-CATEGORICAL EXEMPTION
Project Descriptions(s):	AS PER 12.28 - ZONING ADMINISTRATOR'S ADJUSTMENT TO PERMIT A REDUCED FRONT YARD SETBACK OF 5' IN LIEU OF THE MINIMUM 15' REQUIRED (PER SECTION 12.10 C.1).
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Required Action(s):	ND-NEGATIVE DECLARATION
Project Descriptions(s):	AN ORDINANCE ESTABLISHING PERMANENT REGULATIONS IMPLEMENTING THE MELLO ACT IN THE COASTAL ZONE.
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Required Action(s):	CE-CATEGORICAL EXEMPTION
Project Descriptions(s):	SMALL LOT/TOWNHOME ORDINANCE
Case Number:	ENV-2002-6836-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	VENICE COASTAL SPECIFIC PLAN AMENDMENT prepared and adopted by the City Planning Dept. in accordance with the Coastal Act provisions and guidelines.
Case Number:	ENV-2001-846-ND
Required Action(s):	ND-NEGATIVE DECLARATION
Project Descriptions(s):	

DATA NOT AVAILABLE

CPC-17630

ORD-175694

ORD-175693

ORD-172897

ORD-172019

ORD-168999

ORD-164844-SA3070

ORD-130336

12/18/2017

Generalized Zoning

IMAS PUBLIC



Zoning: R3-1-O
General Plan: Medium Residential

Tract: SHORT LINE BEACH
SUBDIVISION NO. 1
Block: 13
Lot: 1
Arb: None

Address: 200 E VENICE BLVD
APN: 4227003001
N #: 106-5A145 440

LEGEND

GENERALIZED ZONING

- OS, GW
- A, RA
- RE, RS, R1, RU, RZ, RW1
- R2, RD, RMP, RW2, R3, RAS, R4, R5
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GENERAL PLAN LAND USE

LAND USE

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- Minimum Residential
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- Low II Residential
- Low Medium / Low Medium I Residential
- Low Medium II Residential
- Medium Residential
- High Medium Residential
- High Density Residential
- Very High Medium Residential

COMMERCIAL

- Limited Commercial
- Limited Commercial - Mixed Medium Residential
- Highway Oriented Commercial
- Highway Oriented and Limited Commercial
- Highway Oriented Commercial - Mixed Medium Residential
- Neighborhood Office Commercial
- Community Commercial
- Community Commercial - Mixed High Residential
- Regional Center Commercial

FRAMEWORK

COMMERCIAL

- Neighborhood Commercial
- General Commercial
- Community Commercial
- Regional Mixed Commercial

INDUSTRIAL

- Commercial Manufacturing
- Limited Manufacturing
- Light Manufacturing
- Heavy Manufacturing
- Hybrid Industrial

PARKING

- Parking Buffer

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LOS ANGELES INTERNATIONAL AIRPORT

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OPEN SPACE / PUBLIC FACILITIES

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-  Freeway
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MISC. LINES

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 Convalescent Hospital	 Oil Collection Center	 Regional Park (Proposed)
 Correctional Facility	 Parking Enforcement	RPD Residential Plan Development
 Cultural / Historic Site (Proposed)	 Police Headquarters	 Scenic View Site
 Cultural / Historical Site	 Police Station	 Scenic View Site (Proposed)
 Cultural Arts Center	 Police Station (Proposed Expansion)	 School District Headquarters
DMV DMV Office	 Police Station (Proposed)	 School Unspecified Loc/Type (Proposed)
DWP DWP	 Police Training site	 Skill Center
 DWP Pumping Station	PO Post Office	 Social Services
 Equestrian Center	 Power Distribution Station	 Special Feature
 Fire Department Headquarters	 Power Distribution Station (Proposed)	 Special Recreation (a)
 Fire Station	 Power Receiving Station	 Special School Facility
 Fire Station (Proposed Expansion)	 Power Receiving Station (Proposed)	 Special School Facility (Proposed)
 Fire Station (Proposed)	C Private College	 Steam Plant
 Fire Supply & Maintenance	E Private Elementary School	 Surface Mining
 Fire Training Site	 Private Golf Course	 Trail & Assembly Area
 Fireboat Station	 Private Golf Course (Proposed)	 Trail & Assembly Area (Proposed)
 Health Center / Medical Facility	JH Private Junior High School	UTL Utility Yard
 Helistop	PS Private Pre-School	 Water Tank Reservoir
 Historic Monument	 Private Recreation & Cultural Facility	 Wildlife Migration Corridor
 Historical / Cultural Monument	SH Private Senior High School	 Wildlife Preserve Gate
 Horsekeeping Area	SF Private Special School	
 Horsekeeping Area (Proposed)	 Public Elementary (Proposed Expansion)	

SCHOOLS/PARKS WITH 500 FT. BUFFER

-  Existing School/Park Site
-  Planned School/Park Site
-  Inside 500 Ft. Buffer

- | | | |
|---|--|--|
|  Aquatic Facilities |  Other Facilities |  Opportunity School |
|  Beaches |  Park / Recreation Centers |  Charter School |
|  Child Care Centers |  Parks |  Elementary School |
|  Golf Course |  Performing / Visual Arts Centers |  Span School |
|  Historic Sites |  Recreation Centers |  Special Education School |
|  Horticulture/Gardens |  Senior Citizen Centers |  High School |
|  Skate Parks | |  Middle School |

TRANSIT ORIENTED COMMUNITIES (TOC)

- | | |
|--|--|
|  Tier 1 |  Tier 3 |
|  Tier 2 |  Tier 4 |

Note: TOC Tier designation and map layers are for reference purposes only. Eligible projects shall demonstrate compliance with Tier eligibility standards prior to the issuance of any permits or approvals. As transit service changes, eligible TOC Incentive Areas will be updated.

COASTAL ZONE

-  Coastal Zone Commission Authority
-  Calvo Exclusion Area
-  Not in Coastal Zone
-  Dual Jurisdictional Coastal Zone

WAIVER OF DEDICATION OR IMPROVEMENT

-  Waiver of Dedication or Improvement (WDI)
-  Public Work Approval (PWA)

LAMC SECTION 85.02 (VEHICLE DWELLING)

-  No vehicle dwelling anytime
-  No vehicle dwelling overnight between 9:00 PM - 6:00 AM. Must comply with all posted parking restrictions
-  Vehicle dwelling allowed. Must comply with all posted parking restrictions

OTHER SYMBOLS

- | | | |
|---|---|--|
|  Lot Line |  Airport Hazard Zone |  Flood Zone |
|  Tract Line |  Census Tract |  Hazardous Waste |
|  Lot Cut |  Coastal Zone |  High Wind Zone |
|  Easement |  Council District |  Hillside Grading |
|  Zone Boundary |  LADBS District Office |  Historic Preservation Overlay Zone |
|  Building Line |  Downtown Parking |  Specific Plan Area |
|  Lot Split |  Fault Zone |  Very High Fire Hazard Severity Zone |
|  Community Driveway |  Fire District No. 1 |  Oil Wells |
|  Lot Ties |  Tract Map | |
|  Building Outlines 2014 |  Parcel Map | |
|  Building Outlines 2008 | | |



City of Los Angeles Department of City Planning

12/18/2017 PARCEL PROFILE REPORT

PROPERTY ADDRESSES

3233 S THATCHER AVE
3311 S THATCHER AVE
3321 S THATCHER AVE

ZIP CODES

90292

RECENT ACTIVITY

DIR-2008-4703-DI

CASE NUMBERS

CPC-2014-1456-SP
CPC-2005-8252-CA
CPC-2000-4046-CA
CPC-1998-119
CPC-1995-148-GPC-ZC
CPC-1987-648-ICO
CPC-1984-226-SP
CPC-1963-14311
CPC-1949-2836
ORD-175694
ORD-175693
ORD-172897
ORD-172019
ORD-170999-SA60
ORD-170155
ORD-168999
ORD-162509
DIR-2014-2824-DI
ENV-2014-1458-EIR
ENV-2005-8253-ND
ENV-2004-2691-CE
ENV-2002-6836-SP
ENV-2001-846-ND
AFF-4831
CDP-1983-19

Address/Legal Information

PIN Number	105B149 535
Lot/Parcel Area (Calculated)	93,274.7 (sq ft)
Thomas Brothers Grid	PAGE 672 - GRID A6
Assessor Parcel No. (APN)	4229002901
Tract	RAFAEL AND ANDRES MACHADO TRACT
Map Reference	M R 84-33/34
Block	None
Lot	PT "UNNUMBERED LT"
Arb (Lot Cut Reference)	261
Map Sheet	105B149

Jurisdictional Information

Community Plan Area	Venice
Area Planning Commission	West Los Angeles
Neighborhood Council	Venice
Council District	CD 11 - Mike Bonin
Census Tract #	2741.00
LADBS District Office	West Los Angeles

Planning and Zoning Information

Special Notes	None
Zoning	[Q]PF-1XL
Zoning Information (ZI)	ZI-2406 Director's Interpretation of the Venice SP for Small Lot Subdivisio
	ZI-2471 Coastal Zone
	ZI-2452 Transit Priority Area in the City of Los Angeles
General Plan Land Use	Public Facilities
General Plan Note(s)	Yes
Hillside Area (Zoning Code)	No
Specific Plan Area	Los Angeles Coastal Transportation Corridor
Subarea	None
Specific Plan Area	Oxford Triangle
Subarea	None
Specific Plan Area	Venice Coastal Zone
Subarea	Oxford Triangle
Special Land Use / Zoning	None
Design Review Board	No
Historic Preservation Review	No
Historic Preservation Overlay Zone	None
Other Historic Designations	None
Other Historic Survey Information	None
Mills Act Contract	None
CDO: Community Design Overlay	None
CPIO: Community Plan Imp. Overlay	None
Subarea	None
CUGU: Clean Up-Green Up	None
NSO: Neighborhood Stabilization Overlay	No
POD: Pedestrian Oriented Districts	None
SN: Sign District	No

Adaptive Reuse Incentive Area	None
Ellis Act Property	No
Rent Stabilization Ordinance (RSO)	No
Transit Oriented Communities (TOC)	Not Eligible
CRA - Community Redevelopment Agency	None
Central City Parking	No
Downtown Parking	No
Building Line	None
500 Ft School Zone	No
500 Ft Park Zone	No

Assessor Information

Assessor Parcel No. (APN)	4229002901
APN Area (Co. Public Works)*	2.110 (ac)
Use Code	8800 - Miscellaneous - Government Owned Property
Assessed Land Val.	\$176,888
Assessed Improvement Val.	\$0
Last Owner Change	00/00/1964
Last Sale Amount	\$0
Tax Rate Area	67
Deed Ref No. (City Clerk)	None
Building 1	No data for building 1
Building 2	No data for building 2
Building 3	No data for building 3
Building 4	No data for building 4
Building 5	No data for building 5

Additional Information

Airport Hazard	None
Coastal Zone	Calvo Exclusion Area Coastal Zone Commission Authority
Farmland	Area Not Mapped
Urban Agriculture Incentive Zone	YES
Very High Fire Hazard Severity Zone	No
Fire District No. 1	No
Flood Zone	None
Watercourse	No
Hazardous Waste / Border Zone Properties	No
Methane Hazard Site	Methane Zone
High Wind Velocity Areas	No
Special Grading Area (BOE Basic Grid Map A-13372)	No
Oil Wells	None

Seismic Hazards

Active Fault Near-Source Zone	
Nearest Fault (Distance in km)	6.2252352
Nearest Fault (Name)	Santa Monica Fault
Region	Transverse Ranges and Los Angeles Basin
Fault Type	B
Slip Rate (mm/year)	1.00000000
Slip Geometry	Left Lateral - Reverse - Oblique
Slip Type	Moderately / Poorly Constrained
Down Dip Width (km)	13.00000000
Rupture Top	0.00000000
Rupture Bottom	13.00000000
Dip Angle (degrees)	-75.00000000

Alquist-Priolo Fault Zone	No
Landslide	No
Liquefaction	Yes
Preliminary Fault Rupture Study Area	No
Tsunami Inundation Zone	Yes

Economic Development Areas

Business Improvement District	None
Promise Zone	None
Renewal Community	No
Revitalization Zone	None
State Enterprise Zone	None
Targeted Neighborhood Initiative	None

Public Safety

Police Information

Bureau	West
Division / Station	Pacific
Reporting District	1444

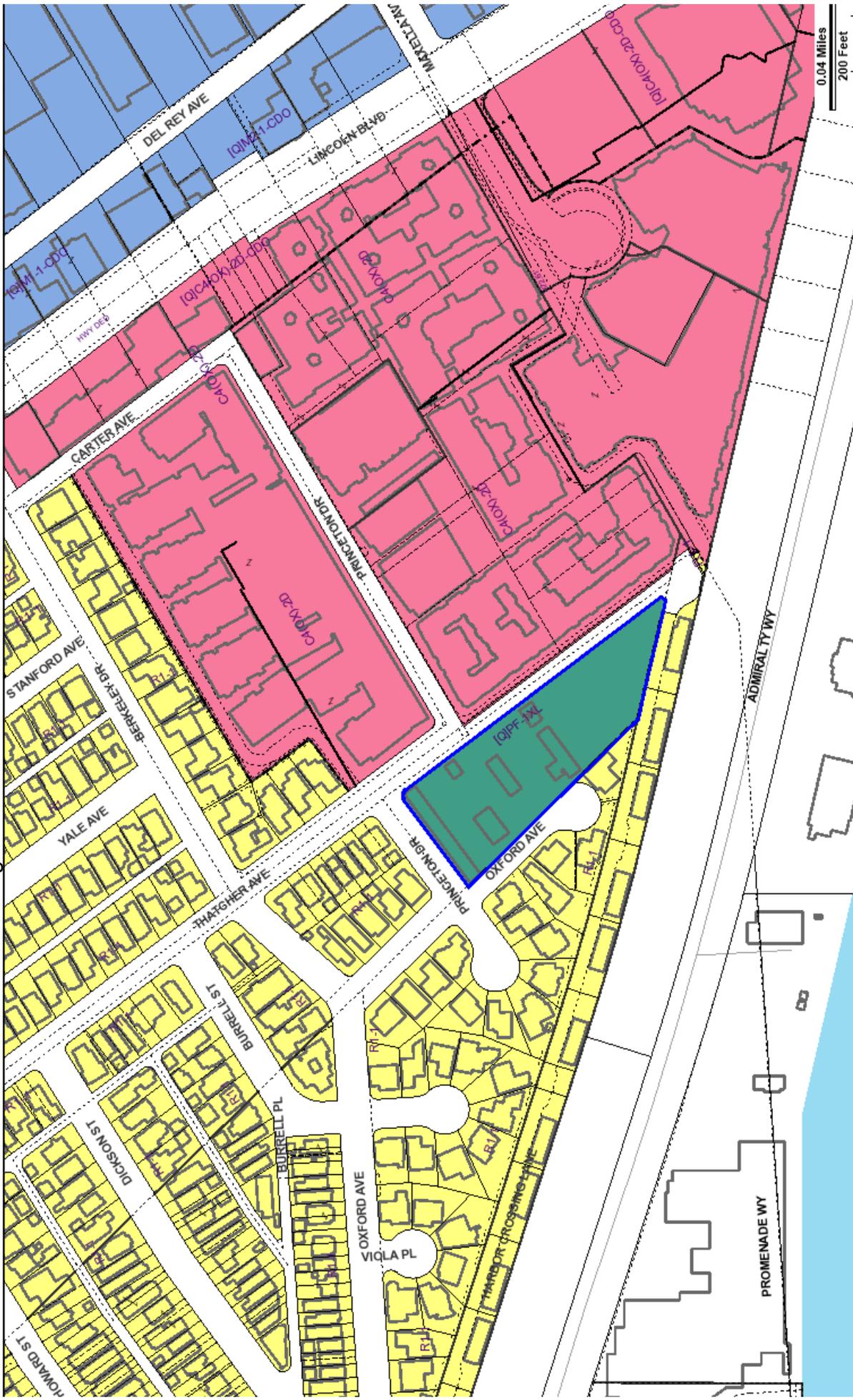
Fire Information

Bureau	West
Batallion	4
District / Fire Station	63
Red Flag Restricted Parking	No

Note: Information for case summaries is retrieved from the Planning Department's Plan Case Tracking System (PCTS) database.

Case Number:	CPC-2014-1456-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	SPECIFIC PLAN AMENDMENT
Case Number:	CPC-2005-8252-CA
Required Action(s):	CA-CODE AMENDMENT
Project Descriptions(s):	AN ORDINANCE ESTABLISHING PERMANENT REGULATIONS IMPLEMENTING THE MELLO ACT IN THE COASTAL ZONE.
Case Number:	CPC-2000-4046-CA
Required Action(s):	CA-CODE AMENDMENT
Project Descriptions(s):	
Case Number:	CPC-1998-119
Required Action(s):	Data Not Available
Project Descriptions(s):	
Case Number:	CPC-1995-148-GPC-ZC
Required Action(s):	GPC-GENERAL PLAN/ZONING CONSISTENCY (AB283) ZC-ZONE CHANGE
Project Descriptions(s):	Data Not Available
Case Number:	CPC-1987-648-ICO
Required Action(s):	ICO-INTERIM CONTROL ORDINANCE
Project Descriptions(s):	INTERIM CONTROL ORDINANCE FOR THE ENTIRE VENICE COASTAL ZONE WHICH WILL TEMPORARILY PERMIT ONLY BUILDING DEVELOPMENT WHICH IS IN CONFORMANCE WITH REGULATIONS SUBSTANTIALLY BASED ON THE CALIFORNIA COASTAL COMMISSIONS INTERPRETIVE GUIDELINES FOR THE AREA
Case Number:	CPC-1984-226-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	Data Not Available
Case Number:	CPC-1963-14311
Required Action(s):	Data Not Available
Project Descriptions(s):	
Case Number:	CPC-1949-2836
Required Action(s):	Data Not Available
Project Descriptions(s):	
Case Number:	DIR-2014-2824-DI
Required Action(s):	DI-DIRECTOR OF PLANNING INTERPRETATION
Project Descriptions(s):	DIRECTOR'S INTERPRETATION OF A SPECIFIC PLAN PURSUANT TO LAMC SECTION 11.5.7.H. THE INTERPRETATION SHALL ONLY BE APPLICABLE TO THE VENICE COASTAL SPECIFIC PLAN.
Case Number:	ENV-2014-1458-EIR
Required Action(s):	EIR-ENVIRONMENTAL IMPACT REPORT
Project Descriptions(s):	ENVIRONMENTAL IMPACT REPORT
Case Number:	ENV-2005-8253-ND
Required Action(s):	ND-NEGATIVE DECLARATION
Project Descriptions(s):	AN ORDINANCE ESTABLISHING PERMANENT REGULATIONS IMPLEMENTING THE MELLO ACT IN THE COASTAL ZONE.
Case Number:	ENV-2004-2691-CE
Required Action(s):	CE-CATEGORICAL EXEMPTION
Project Descriptions(s):	SMALL LOT/TOWNHOME ORDINANCE
Case Number:	ENV-2002-6836-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	VENICE COASTAL SPECIFIC PLAN AMENDMENT prepared and adopted by the City Planning Dept. in accordance with the Coastal Act provisions and guidelines.
Case Number:	ENV-2001-846-ND
Required Action(s):	ND-NEGATIVE DECLARATION
Project Descriptions(s):	
Case Number:	CDP-1983-19
Required Action(s):	Data Not Available
Project Descriptions(s):	

ORD-175694
ORD-175693
ORD-172897
ORD-172019
ORD-170999-SA60
ORD-170155
ORD-168999
ORD-162509
AFF-4831



Address: 3233 S THATCHER AVE
 APN: 4229002901
 N #: 105B149 535

Tract: RAFAEL AND ANDRES
 MACHADO TRACT
 Block: None
 Lot: PT "UNNUMBERED LT"
 Arb: 261

Zoning: [QJPF-1XL
 General Plan: Public Facilities



LEGEND

GENERALIZED ZONING

- OS, GW
- A, RA
- RE, RS, R1, RU, RZ, RW1
- R2, RD, RMP, RW2, R3, RAS, R4, R5
- CR, C1, C1.5, C2, C4, C5, CW, ADP, LASED, CEC, USC, PVSP, PPSP
- CM, MR, WC, CCS, UV, UI, UC, M1, M2, LAX, M3, SL
- P, PB
- PF

GENERAL PLAN LAND USE

LAND USE

RESIDENTIAL

- Minimum Residential
- Very Low / Very Low I Residential
- Very Low II Residential
- Low / Low I Residential
- Low II Residential
- Low Medium / Low Medium I Residential
- Low Medium II Residential
- Medium Residential
- High Medium Residential
- High Density Residential
- Very High Medium Residential

COMMERCIAL

- Limited Commercial
- Limited Commercial - Mixed Medium Residential
- Highway Oriented Commercial
- Highway Oriented and Limited Commercial
- Highway Oriented Commercial - Mixed Medium Residential
- Neighborhood Office Commercial
- Community Commercial
- Community Commercial - Mixed High Residential
- Regional Center Commercial

FRAMEWORK

COMMERCIAL

- Neighborhood Commercial
- General Commercial
- Community Commercial
- Regional Mixed Commercial

INDUSTRIAL

- Commercial Manufacturing
- Limited Manufacturing
- Light Manufacturing
- Heavy Manufacturing
- Hybrid Industrial

PARKING

- Parking Buffer

PORT OF LOS ANGELES

- General / Bulk Cargo - Non Hazardous (Industrial / Commercial)
- General / Bulk Cargo - Hazard
- Commercial Fishing
- Recreation and Commercial
- Intermodal Container Transfer Facility Site

LOS ANGELES INTERNATIONAL AIRPORT

- Airport Landside / Airport Landside Support
- Airport Airside
- LAX Airport Northside

OPEN SPACE / PUBLIC FACILITIES

- Open Space
- Public / Open Space
- Public / Quasi-Public Open Space
- Other Public Open Space
- Public Facilities

INDUSTRIAL

- Limited Industrial
- Light Industrial

CIRCULATION

STREET

-  Arterial Mountain Road
-  Collector Scenic Street
-  Collector Street
-  Collector Street (Hillside)
-  Collector Street (Modified)
-  Collector Street (Proposed)
-  Country Road
-  Divided Major Highway II
-  Divided Secondary Scenic Highway
-  Local Scenic Road
-  Local Street
-  Major Highway (Modified)
-  Major Highway I
-  Major Highway II
-  Major Highway II (Modified)

-  Major Scenic Highway
-  Major Scenic Highway (Modified)
-  Major Scenic Highway II
-  Mountain Collector Street
-  Park Road
-  Parkway
-  Principal Major Highway
-  Private Street
-  Scenic Divided Major Highway II
-  Scenic Park
-  Scenic Parkway
-  Secondary Highway
-  Secondary Highway (Modified)
-  Secondary Scenic Highway
-  Special Collector Street
-  Super Major Highway

FREEWAYS

-  Freeway
-  Interchange
-  On-Ramp / Off- Ramp
-  Railroad
-  Scenic Freeway Highway

MISC. LINES

-  Airport Boundary
-  Bus Line
-  Coastal Zone Boundary
-  Coastline Boundary
-  Collector Scenic Street (Proposed)
-  Commercial Areas
-  Commercial Center
-  Community Redevelopment Project Area
-  Country Road
-  DWP Power Lines
-  Desirable Open Space
-  Detached Single Family House
-  Endangered Ridgeline
-  Equestrian and/or Hiking Trail
-  Hiking Trail
-  Historical Preservation
-  Horsekeeping Area
-  Local Street
-  MSA Desirable Open Space
-  Major Scenic Controls
-  Multi-Purpose Trail
-  Natural Resource Reserve
-  Park Road
-  Park Road (Proposed)
-  Quasi-Public
-  Rapid Transit Line
-  Residential Planned Development
-  Scenic Highway (Obsolete)
-  Secondary Scenic Controls
-  Secondary Scenic Highway (Proposed)
-  Site Boundary
-  Southern California Edison Power
-  Special Study Area
-  Specific Plan Area
-  Stagecoach Line
-  Wildlife Corridor

POINTS OF INTEREST

 Alternative Youth Hostel (Proposed)	 Horticultural Center	 Public Elementary School
 Animal Shelter	 Hospital	 Public Elementary School (Proposed)
 Area Library	 Hospital (Proposed)	 Public Golf Course
 Area Library (Proposed)	HW House of Worship	 Public Golf Course (Proposed)
 Bridge	e Important Ecological Area	 Public Housing
 Campground	 Important Ecological Area (Proposed)	 Public Housing (Proposed Expansion)
 Campground (Proposed)	 Interpretive Center (Proposed)	 Public Junior High School
 Cemetery	 Junior College	 Public Junior High School (Proposed)
HW Church	 MTA / Metrolink Station	 Public Middle School
 City Hall	 MTA Station	 Public Senior High School
 Community Center	 MTA Stop	 Public Senior High School (Proposed)
 Community Library	MWD MWD Headquarters	 Pumping Station
 Community Library (Proposed Expansion)	 Maintenance Yard	 Pumping Station (Proposed)
 Community Library (Proposed)	 Municipal Office Building	 Refuse Collection Center
 Community Park	 Municipal Parking lot	 Regional Library
 Community Park (Proposed Expansion)	 Neighborhood Park	 Regional Library (Proposed Expansion)
 Community Park (Proposed)	 Neighborhood Park (Proposed Expansion)	 Regional Library (Proposed)
 Community Transit Center	 Neighborhood Park (Proposed)	 Regional Park
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- | | | |
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- | | |
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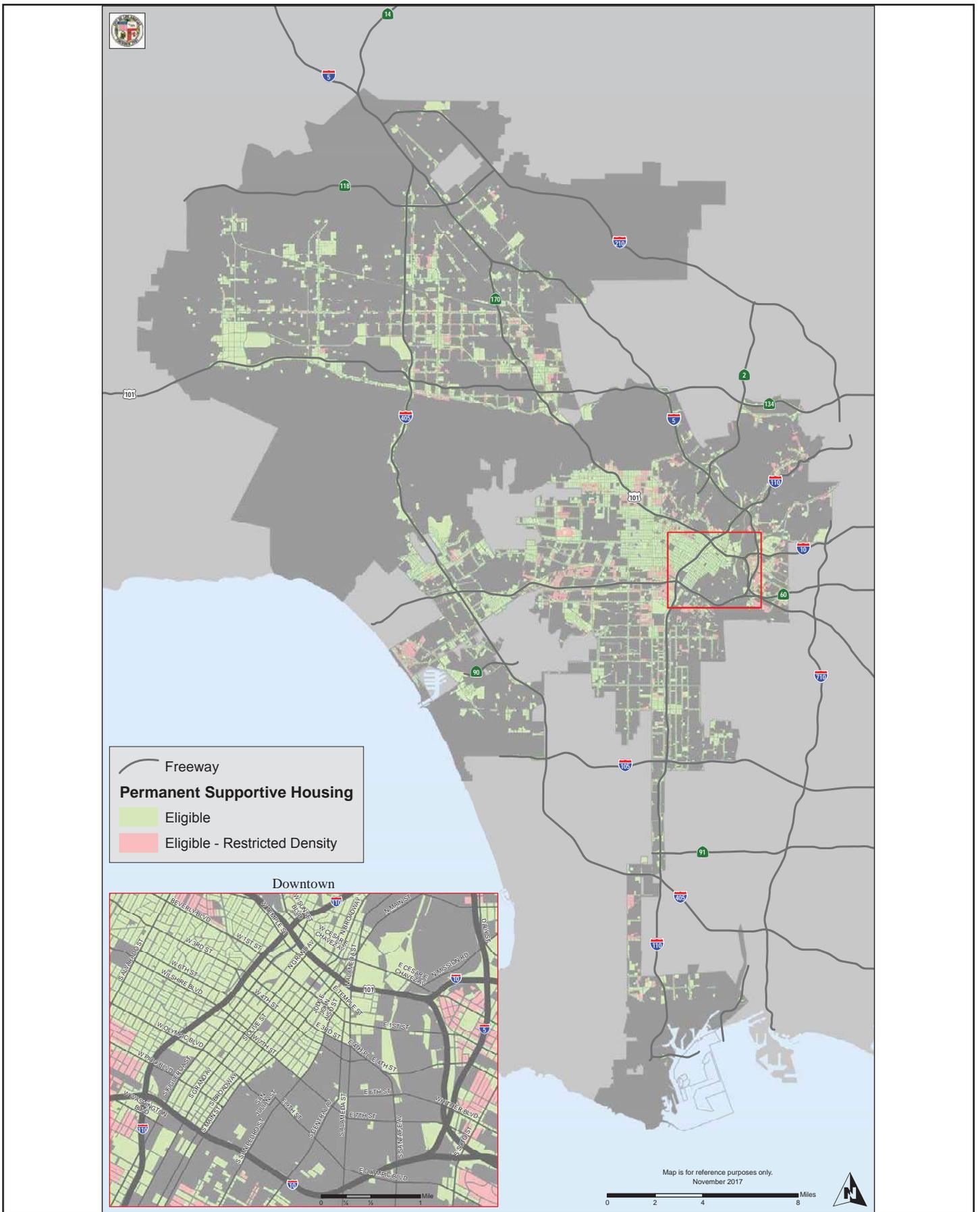
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- | | | |
|---|---|--|
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|  Easement |  Council District |  Hillside Grading |
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|  Community Driveway |  Fire District No. 1 |  Oil Wells |
|  Lot Ties |  Tract Map | |
|  Building Outlines 2014 |  Parcel Map | |
|  Building Outlines 2008 | | |

Attachments To The
Channel Law Comments On The Environmental Documentation For, And The,
Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And
Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd
(APN 4238-024-900 To 911)
December 20, 2017

Attachment 4
Location of PSH Ordinance Eligible Parcels.



SOURCE: City of Los Angeles Department of City Planning, 2017

FIGURE 4

PSH Eligible Parcels

Attachments To The
Channel Law Comments On The Environmental Documentation For, And The,
Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And
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(APN 4238-024-900 To 911)
December 20, 2017

Attachment 4
Notice of Intent to Adopt MND from City's Website



Search Classifieds for

In Category

Zip Code

Miles around

Example: "Brown Couch"

All Categories

90012

50 miles

Go

Place an Ad with the Los Angeles Times!

Browse Categories

▼ For Sale

- Antiques
- Arts & Crafts
- Auto Parts
- Baby & Kid Stuff
- Bicycles
- Boats
- Books & Magazines
- Building Supplies & Materials
- Business & Commercial
- CDs/DVDs/VHS
- Clothing & Accessories
- Collectibles
- Computers & Technology
- Electronics
- Furniture
- Games & Toys
- Health & Beauty
- Household Items
- Jewelry
- Motorcycles & Scooters
- Musical Instruments
- Outdoor & Garden
- Pets
- Powered by Gadzoo.com
- Photography & Video
- Recreational Vehicles
- Sporting Goods
- Tickets
- Tools
- Wanted to Buy
- Other

- Real Estate
- Services
- Announcements
- Events

Legal Notices: City Of

Legal Notices: CITY OF LOS ANGELES ENVIRONMENTAL NOTICES Notice is hereby given to the general public of the availability for public review and comment on the following Environmental documents. Please call Darlene Navarrete to review file: (213)978-1332. Files are available for REVIEW at: Los Angeles City Hall, 200 N. Spring St., Room 750, Los Angeles, CA 90012. Comments can be faxed to: (213)978-1343, or emailed to darlene.navarrete@lacity.org. (*unless otherwise noted). CD indicates the City Council District, sf indicates square feet and LAMC indicates Los Angeles Municipal Code. The publication is intended to serve as our Notice of Intent to adopt the following Mitigated Negative Declaration (MND) or Negative Declaration (ND) MITIGATED NEGATIVE DECLARATION-NG-17-138-PL: ENV-2017-1015. 15116-15216 S Vermont Ave & 747-761 W Redondo Beach Blvd; Harbor Gateway. CD15. The proposed project is the construction, use & maintenance of a new, 1-story (with mezzanine), 54-ft. tall, 466,402 sf warehouse/manufacturing/high-cube warehouse/distribution center with a total of 246 automobile parking spaces & 24 bicycle parking spaces. The proposed project requires Conditional Use Permits for a development which creates 250,000 sf or more of warehouse floor area & deviations from the Commercial Corner Development regulations; a Zoning Administrator's Adjustment to allow a 20% increase in the permitted building height; a Zoning Administrator's Determination to allow deviations from the Transitional Height provisions, and a Site Plan Review. REVIEW/COMMENT period ends: Jan. 2, 2018 NEGATIVE DECLARATION-NG-17-139-PL: ENV-2017-3410. Citywide zoning ordinance affecting all legally existing Hotels, Motels, Apartment Hotels, Transient Occupancy Residential Structures and Hostels located in the City of Los Angeles. CD's 1-15. The Proposed Interim Motel Conversion (IMC) Project is an ordinance (IMC Ordinance) that would amend Sections 12.03, 14.00 & 151.02 of the City of Los Angeles Municipal Code (LAMC) to establish regulations to facilitate the use of existing hotels & motels for Supportive Housing and/or Transitional Housing. The ordinance will remove regulatory barriers to allow for the temporary re-use of existing structures for residential purposes. The proposed amendment to LAMC Section 12.03 would formalize the definitions of Supportive Housing, Transitional Housing, and Supportive Services to reflect existing state law. The proposed amendments to LAMC Section 14.00 would change the approval process to allow existing residential structures such as Hotels, Motels, Apartment Hotels, Transient Occupancy Residential Structures & Hostels to conduct minor interior alterations & a temporary change of use to supportive housing and/or transitional housing. The supportive housing/transitional housing use is temporary, and is contingent upon the existence of a valid contract with a local public agency to provide that use; upon termination of any such contract, the Interim Motel Conversion Project would be required to revert to the previous legally existing use. Provisions are included in this section to ensure that the temporary change in use will not result in any increase in building footprint, the number of units, or the overall building height. The proposed amendments to LAMC Section 151.02 would amend the City's Rent Stabilization Ordinance to include an exemption for such projects, which are operating under the protection of a contract to provide the supportive housing and/or transitional housing use. REVIEW/COMMENT period ends: Dec. 20, 2017 MITIGATED NEGATIVE DECLARATION-NG-17-140-PL: ENV-2017-3137. Citywide zoning ordinance affecting all parcels in the City of Los Angeles zoned for multifamily residential use & located within High Quality Transit Areas (HQTAs). Additionally, PSH development could occur on some parcels zoned Public Facilities (PF), and on some sites which are currently protected under the City's Residential Hotel Unit Conversion & Demolition Ordinance in LAMC Section 47.70 et seq. CD's 1-15. The Proposed Permanent Supportive Housing (PSH) Project is an ordinance (PSH Ordinance) that would amend the City of Los Angeles Municipal Code (LAMC) to facilitate development of PSH units. The purpose of this ordinance is to improve the process for the development of these units. The Proposed PSH Project would amend Sections 12.03, 12.04.09, 14.00 & 16.05 of the LAMC establishing regulations that define PSH & project eligibility criteria, establish unique development standards for PSH, and facilitate administrative review & approval, as well as modify certain provisions related to height & density. The Project also includes amendments to the Land Use element of the City's General Plan (consisting of 35 Community Plans) to allow PSH development to exceed any otherwise applicable minimum lot area per dwelling unit or guest room standards for the zone in which it is located. The PSH Ordinance would allow for projects to select up to 4 concessions with respect to the Zoning Code, including up to 20% decrease in required setbacks, up to 20% reduction in required open space, up to 20% increase in lot coverage limits, up to 35% increase in FAR and depending on the height district up to a 35% increase in height or one additional story. Additional design requirements include that when adjacent to or across an alley from an R2 or more restrictive zone, the building's transitional height shall be stepped-back within a 45-degree angle. REVIEW/COMMENT period ends: Dec. 20, 2017

Additional Information

Posted: 2 weeks, 5 days, 19 hours ago
Category: Public & Legal Notices

PUBLICATION OF ENVIRONMENTAL NOTICES

LOS ANGELES TIMES

THURSDAY, NOVEMBER 30, 2017

Notice is hereby given to the general public of the availability for public review and comment on the following Environmental documents. Please call Darlene Navarrete to review file: (213)978-1332. Files are available for REVIEW at: Los Angeles City Hall, 200 N. Spring St., Room 750, Los Angeles, CA 90012. Comments can be faxed to: (213)978-1343, or emailed to darlene.navarrete@lacity.org. (*unless otherwise noted). CD indicates the City Council District, sf indicates square feet and LAMC indicates Los Angeles Municipal Code. The publication is intended to serve as our Notice of Intent to adopt the following Mitigated Negative Declaration (MND) or Negative Declaration (ND)

MITIGATED NEGATIVE DECLARATION-NG-17-138-PL: [ENV-2017-1015](#). [ENV-2017-1015-A](#). [ENV-2017-1015-B](#). [ENV-2017-1015-C](#). [ENV-2017-1015-D](#). 15116-15216 S Vermont Ave & 747-761 W Redondo Beach Blvd; Harbor Gateway. CD15. The proposed project is the construction, use & maintenance of a new, 1-story (with mezzanine), 54-ft. tall, 466,402 sf warehouse/manufacturing/high-cube warehouse/distribution center with a total of 246 automobile parking spaces & 24 bicycle parking spaces. The proposed project requires Conditional Use Permits for a development which creates 250,000 sf or more of warehouse floor area & deviations from the Commercial Corner Development regulations; a Zoning Administrator's Adjustment to allow a 20% increase in the permitted building height; a Zoning Administrator's Determination to allow deviations from the Transitional Height provisions, and a Site Plan Review. REVIEW/COMMENT period ends: Jan. 2, 2018

NEGATIVE DECLARATION-NG-17-139-PL: [ENV-2017-3410](#). Citywide zoning ordinance affecting all legally existing Hotels, Motels, Apartment Hotels, Transient Occupancy Residential Structures and Hostels located in the City of Los Angeles. CD's 1-15. The Proposed Interim Motel Conversion (IMC) Project is an ordinance (IMC Ordinance) that would amend Sections 12.03, 14.00 & 151.02 of the City of Los Angeles Municipal Code (LAMC) to establish regulations to facilitate the use of existing hotels & motels for Supportive Housing and/or Transitional Housing. The ordinance will remove regulatory barriers to allow for the temporary re-use of existing structures for residential purposes. The proposed amendment to LAMC Section 12.03 would formalize the definitions of Supportive Housing, Transitional Housing, and Supportive Services to reflect existing state law. The proposed amendments to LAMC Section 14.00 would change the approval process to allow existing residential structures such as Hotels, Motels, Apartment Hotels, Transient Occupancy Residential Structures & Hostels to conduct minor interior alterations & a temporary change of use to supportive housing and/or transitional housing. The supportive housing/transitional housing use is temporary, and is contingent upon the existence of a valid contract with a local

public agency to provide that use; upon termination of any such contract, the Interim Motel Conversion Project would be required to revert to the previous legally existing use. Provisions are included in this section to ensure that the temporary change in use will not result in any increase in building footprint, the number of units, or the overall building height. The proposed amendments to LAMC Section 151.02 would amend the City's Rent Stabilization Ordinance to include an exemption for such projects, which are operating under the protection of a contract to provide the supportive housing and/or transitional housing use. REVIEW/COMMENT period ends: Dec. 20, 2017

MITIGATED NEGATIVE DECLARATION-NG-17-140-PL: [ENV-2017-3137](#). Citywide zoning ordinance affecting all parcels in the City of Los Angeles zoned for multifamily residential use & located within High Quality Transit Areas (HQTA). Additionally, PSH development could occur on some parcels zoned Public Facilities (PF), and on some sites which are currently protected under the City's Residential Hotel Unit Conversion & Demolition Ordinance in LAMC Section 47.70 et seq. CD's 1-15. The Proposed Permanent Supportive Housing (PSH) Project is an ordinance (PSH Ordinance) that would amend the City of Los Angeles Municipal Code (LAMC) to facilitate development of PSH units. The purpose of this ordinance is to improve the process for the development of these units. The Proposed PSH Project would amend Sections 12.03, 12.04.09, 14.00 & 16.05 of the LAMC establishing regulations that define PSH & project eligibility criteria, establish unique development standards for PSH, and facilitate administrative review & approval, as well as modify certain provisions related to height & density, consistent with State Density Bonus Law. The PSH Ordinance would allow for projects to select up to four concessions with respect to Zoning Code, including up to 20% decrease in required setbacks, up to 20% reduction in required open space, up to 20% increase in lot coverage limits, up to 35% increase in FAR and depending on the height district up to a 35% increase in height or one additional story. Additional design requirements include that when adjacent to or across an alley from an R2 or more restrictive zone, the building's transitional height shall be stepped-back within a 45-degree angle. REVIEW/COMMENT period ends: Dec. 20, 2017

Attachments To The
Channel Law Comments On The Environmental Documentation For, And The,
Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And
Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd
(APN 4238-024-900 To 911)
December 20, 2017

Attachment 6
CEQANet, State Clearinghouse Records for SCAG's RTP/SCS EIR



[OPR Home](#) > [CEQAnet Home](#) > [CEQAnet Query](#) > Search Results

Click Project Title link to display all related documents. Document Type link will display full document description.

Records Found: 8

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Query Parameters:			Date Range:		
SCH#	Lead Agency	Project Title	Description	Document Type	Date Received
2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	The 2016 RTP/SCS Amendment #1 includes the inclusion and/or revision to 76 transportation projects, or approx. 2 percent of the total 2016 RTP/SCS projects. Changes include revisions to the project scope, cost and/or schedule to 54 projects already included in the 2016 RTP/SCS and inclusion of 22 new projects. The revisions and additions to the Project List will not result in substantial changes to the previously adopted 2016 RTP/SCS. (for further details, please refer to Page 4 "Project Description" in the ADD PEIR). An Addendum EIR was prepared since revisions would not result in new significant impacts or substantial increases to impacts.	NOD	7/11/2017
2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	Note: Review Per Lead The 2016 RTP/SCS Amendment #1 includes the inclusion and/or revision to 76 transportation projects, or approx. 2 percent of the total 2016 RTP/SCS projects. Changes include revisions to the project scope, cost and/or schedule to 54 projects already included in the 2016 RTP/SCS and inclusion of 22 new projects. The revisions and additions to the Project List will not result in substantial changes to the previously adopted 2016 RTP/SCS. (for further details, please refer to Page 4 "Project Description" in the ADD PEIR). An Addendum EIR was prepared since revisions would not result in new significant impacts or substantial increases to impacts.	ADM	7/10/2017
2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	The 2016 RTP/SCS Amendment #1 includes the inclusion and/or revision to 76 transportation projects, or approx. 2 percent of the total 2016 RTP/SCS projects. Changes include revisions to the project scope, cost and/or schedule to 54 projects already included in the 2016 RTP/SCS and inclusion of 22 new projects. The revisions and additions to the Project List will not result in substantial changes to the previously adopted 2016 RTP/SCS. (for further details, please refer to Page 4 "Project Description" in the ADD PEIR). An Addendum EIR was prepared since revisions would not result in new significant impacts or substantial increases to impacts.	ADM	4/10/2017
2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	The 2016 RTP/SCS Amendment #1 includes the inclusion and/or revision to 76 transportation projects, or approx. 2 percent of the total 2016 RTP/SCS projects. Changes include revisions to the project scope, cost and/or schedule to 54 projects already included in the 2016 RTP/SCS and inclusion of 22 new projects. The revisions and additions to the Project List will not result in substantial changes to the previously adopted 2016 RTP/SCS. (for further details, please refer to Page 4 "Project Description" in the ADD PEIR). An Addendum EIR was prepared since revisions would not result in new significant impacts or substantial increases to impacts.	NOD	4/10/2017
2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	Note: FYI Final The 2016 RTP/SCS updates the last adopted 2012 RTP/SCS, last amended in Sept. 2014, by refining goals, objectives, and policies and list of projects, and extending the planning horizon to 2040. As with the 2012 RTP/SCS, the 2016 RTP/SCS is intended to continue the region's various	FIN	4/8/2016

strategies that improve the balance between land use and transportation and transit systems, both current and future.

2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	The 2016 RTP/SCS updates the last adopted 2012 RTP/SCS, last amended in Sept. 2014, by refining goals, objectives, and policies and list of projects, and extending the planning horizon to 2040. As with the 2012 RTP/SCS, the 2016 RTP/SCS is intended to continue the region's various strategies that improve the balance between land use and transportation and transit systems, both current and future.	Oth	4/8/2016
2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	Note: Extended Review per lead. The 2016 RTP/SCS updates the last adopted 2012 RTP/SCS, last amended in Sept. 2014, by refining goals, objectives, and policies and list of projects, and extending the planning horizon to 2040. As with the 2012 RTP/SCS, the 2016 RTP/SCS is intended to continue the region's various strategies that improve the balance between land use and transportation and transit systems, both current and future.	EIR	12/4/2015
2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	The 2016 RTP/SCS updates the last adopted 2012 RTP/SCS, last amended in Sept. 2014, by refining goals, objectives, and policies and list of projects, and extending the planning horizon to 2040. As with the 2012 RTP/SCS, the 2016 RTP/SCS is intended to continue the region's various strategies that improve the balance between land use and transportation and transit systems, both current and future.	NOP	3/9/2015

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Addendum #2 to the 2016-2040 RTP/SCS

SCH Number: 2015031035

Document Type: EIR - Draft EIR

Project Lead Agency: Southern California Association of Governments

Project Description

Note: Extended Review per lead. The 2016 RTP/SCS updates the last adopted 2012 RTP/SCS, last amended in Sept. 2014, by refining goals, objectives, and policies and list of projects, and extending the planning horizon to 2040. As with the 2012 RTP/SCS, the 2016 RTP/SCS is intended to continue the region's various strategies that improve the balance between land use and transportation and transit systems, both current and future.

Contact Information

Primary Contact:

Ms. Lijin Sun
Southern California Association of Governments
213-236-1882
818 W. 7th Street; 12th Floor
Los Angeles, CA 90017-3435

Project Location

County: Los Angeles
City: Los Angeles, City of
Region:
Cross Streets:
Latitude/Longitude:
Parcel No:
Township:
Range:
Section:
Base:
Other Location Info: six-county area

Proximity To

Highways:
Airports:
Railways:
Waterways:
Schools:
Land Use:

Development Type

Power: Hydroelectric

Local Action

Project Issues

Agricultural Land, Air Quality, Archaeologic-Historic, Biological Resources, Coastal Zone, Drainage/Absorption, Economics/Jobs, Fiscal Impacts, Flood Plain/Flooding, Forest Land/Fire Hazard, Geologic/Seismic, Minerals, Noise, Population/Housing Balance, Public Services, Recreation/Parks, Schools/Universities, Sewer Capacity, Soil Erosion/Compaction/Grading, Solid Waste, Toxic/Hazardous, Traffic/Circulation, Vegetation, Water Quality, Wetland/Riparian, Water Supply, Growth Inducing, Landuse, Cumulative Effects, Aesthetic/Visual

Reviewing Agencies (Agencies in **Bold Type** submitted comment letters to the State Clearinghouse)

Resources Agency; California Coastal Commission; Coachella Valley Mountains Conservancy; **Department of Fish and Wildlife, Headquarters**; Cal Fire; Office of Emergency Services, California; California Highway Patrol; Caltrans, Division of Transportation Planning; Air Resources Board, Transportation Projects; State Water Resources Control Board, Division of Water Quality; Regional Water Quality Control Board, Region 4; Regional Water Quality Control Bd., Region 6 (Victorville); **Regional Water Quality Control Bd., Region 6 (So Lake Tahoe)**; Regional Water Quality Control Board, Region 7; Regional Water Quality Control Board, Region 8; Regional Water Quality Control Board, Region 9; Native American Heritage Commission; Public Utilities Commission

Date Received: 12/4/2015 **Start of Review:** 12/4/2015 **End of Review:** 2/1/2016

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Addendum #2 to the 2016-2040 RTP/SCS

SCH Number: 2015031035

Document Type: ADM - Addendum

Alternate Title: 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS)

Project Lead Agency: Southern California Association of Governments

Project Description

Note: Review Per Lead The 2016 RTP/SCS Amendment #1 includes the inclusion and/or revision to 76 transportation projects, or approx. 2 percent of the total 2016 RTP/SCS projects. Changes include revisions to the project scope, cost and/or schedule to 54 projects already included in the 2016 RTP/SCS and inclusion of 22 new projects. The revisions and additions to the Project List will not result in substantial changes to the previously adopted 2016 RTP/SCS. (for further details, please refer to Page 4 "Project Description" in the ADD PEIR). An Addendum EIR was prepared since revisions would not result in new significant impacts or substantial increases to impacts.

Contact Information

Primary Contact:

Ping Chang
Southern California Association of Governments
213-236-1839
818 W. 7th Street; 12th Floor
Los Angeles, CA 90017-3435

Project Location

County: Los Angeles
City:
Region:
Cross Streets:
Latitude/Longitude:
Parcel No:
Township:
Range:
Section:
Base:
Other Location Info: six-county area

Proximity To

Highways:
Airports:
Railways:
Waterways:
Schools:
Land Use:

Development Type

Other (2016 RTP/SCS)

Local Action

Project Issues

Coastal Zone, Drainage/Absorption, Economics/Jobs, Fiscal Impacts, Flood Plain/Flooding, Forest Land/Fire Hazard, Geologic/Seismic, Minerals, Noise, Population/Housing Balance, Public Services, Recreation/Parks, Schools/Universities, Sewer Capacity, Soil Erosion/Compaction/Grading, Solid Waste, Toxic/Hazardous, Traffic/Circulation, Vegetation, Water Quality, Wetland/Riparian, Water Supply, Growth Inducing, Landuse, Cumulative Effects, Aesthetic/Visual, Agricultural Land, Septic System, Air Quality, Archaeologic-Historic

Reviewing Agencies (Agencies in **Bold Type** submitted comment letters to the State Clearinghouse)

Resources Agency; Department of Fish and Wildlife, Headquarters; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, Division of Transportation Planning; Native American Heritage Commission; Public Utilities Commission; Regional Water Quality Control Board, Region 4; Regional Water Quality Control Bd., Region 6 (Victorville); Regional Water Quality Control Board, Region 7; Regional Water Quality Control Board, Region 8; Regional Water Quality Control Board, Region 9; Air Resources Board, Transportation Projects

Date Received: 7/10/2017 **Start of Review:** 7/10/2017 **End of Review:** 8/24/2017

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Channel Law Group, LLP

8200 Wilshire Blvd.
Suite 300
Beverly Hills, CA 90211

Phone: (310) 347-0050
Fax: (323) 723-3960
www.channellawgroup.com

JULIAN K. QUATTLEBAUM, III *
JAMIE T. HALL **
CHARLES J. McLURKIN

Writer's Direct Line: (310) 982-1760
jamie.hall@channellawgroup.com

*ALSO Admitted in Colorado
**ALSO Admitted in Texas

February 12, 2018

VIA ELECTRONIC MAIL

City Council, Planning and
Land Use Management Committee
Department of City Planning,
City Hall - Room 763,
200 North Spring Street,
Los Angeles CA 90012

Via email: darlene.navarrete@lacity.org
and: cally.hardy@lacity.org

**Re: Comments On The Environmental Documentation For, And The,
Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-
3137) And Proposed Redevelopment Of 3233 S. Thatcher Avenue (APN 4229-
002-901)**

Dear City Council Members:

This firm represents Oxford Triangle Association with regard to the proposed development at 3233 S. Thatcher Avenue as well as the Permanent Supportive Housing Ordinance (PSH Ordinance) proposed by the City of Los Angeles (City). This is our firm's third comment letter on the PSH Ordinance and associated environmental documents. We previously submitted letters on October 30, 2017 and December 20, 2017. Three letters have been necessitated by the City's flawed California Environmental Quality Act (CEQA) and project review process. Our previous two letters are incorporated herein by reference and included in **Appendix A**. We again request responses to all three of our letters.

This letter addresses both the continuing defects in the City's CEQA process regarding the PSH Ordinance, and defects in the November 27, 2017 Mitigated Negative Declaration (MND) re-circulated, without change, for public review and comment from January 11, 2018 to February 12, 2018. The November 27, 2017 MND was originally circulated for an inadequate 21-day comment period from November 30, 2017 to December 20, 2017. It appears that after we pointed out a number of serious defects in the City's process, including the failure to circulate the MND for the required 30-day period, that the City has responded by recirculating, without change, the November 27, 2017 MND. The re-circulated MND therefore does not respond to or address any

of the public comments received during the MND's original and inadequate 21-day comment period, including Channel Law's comments. All of the letters received during both this comment period and the original 21-day comment period should be presented to the City Council Planning and Land Use (PLUM) Committee, along with responses to comments. It should be noted that re-circulation of the MND only addresses two of the many failings of the City's process.

1. PROCEEDURAL ISSUES - THE CITY'S PROCESS FOR REVIEWING AND APPROVING THE PERMANENT SUPPORTIVE HOUSING ORDINANCE IS FATAALLY FLAWED

The City has engaged in a confusing and fatally flawed process regarding the adoption of the PSH Ordinance, which has hampered meaningful public participation in the process.

1.1 The City Conducted Public Hearings and Ended The Comment Period On The Ordinance On October 30, 2017 Prior to Release of the MND

The City released the PSH Ordinance for a 60-day comment period beginning on August 31, 2017 and ending on October 30, 2017. On October 30, 2017 Channel Law provided the City with comments on the Permanent Supportive Housing (PSH) Ordinance, including comments on:

- The lack of availability of a CEQA document during the public review period for the PSH Ordinance;
- The inaccurate project description provided as part of the answers to the Frequently Asked Questions attached to the Notice requesting comments on the PSH Ordinance;
- The failure of the PSH Ordinance Notice to disclose the creation of a new CEQA exemption;
- The inadequate project description resulting from failure to describe the number and location of PSH developments;
- The inadequate requirement for the provision of supportive services, and its potential to result in environmental consequences; and,
- The need to address the potential for growth-inducing impacts, cumulative impacts, and increased water demand.

Channel Law's October 30, 2017 comment letter is incorporated herein by reference and included in **Appendix A** to this letter. Channel Law asked a number of questions regarding the PSH Ordinance and also made the following suggestions regarding ways to amend the PSH Ordinance in that letter, including:

- Remove the new CEQA exemption for PSH projects; instead the existing CEQA low-income housing exemption should be applied.
- Include language in the Ordinance to make clear that pursuant to CEQA Guidelines Section 15268(d) where a PSH project involves an approval that contains elements of both a ministerial action and a discretionary action, the project will be deemed to be discretionary and will be subject to the requirements of CEQA.
- Allow for automatic rezoning of only those parcels addressed in the environmental document for the proposed Ordinance, or specifically addressed in the environmental document for the applicable area plan.

- Add requirements for provision of an appropriate level of supportive services to be maintained over the life of individual PSH projects

Channel Law has not received responses to our questions or comments. Channel Law's comment letter was not included in the December 14, 2017 Staff Report and agenda packet for the Planning Commission. Furthermore, Channel Law's comments and suggestions were largely ignored, and were not adequately addressed in the December 14, 2017 Planning Commission Staff Report, including the following Exhibits to the Staff Report:

- A - Proposed Permanent Supportive Housing Ordinance
- B - Environmental Clearance
 - B.1 Mitigated Negative Declaration
 - B.2 Addendum to the SCAG 2016-2040 RTP/SCS PEIR, SCH No. 2015031035
- C - Affordable Housing Opportunity Sites

Channel Law was not able to provide comments on the MND for the project during the 60-day comment period on the Ordinance, because the MND was not released until November 30, 2017. During the 60-day comment period, staff held two public hearings on the PSH Ordinance, on: September 25, 2017 and September 28, 2017. The comment period on the Ordinance thus ended a month before the City's November 30, 2017 release of the MND for the project.

The failure to provide the public with the MND for the PSH Ordinance until one month after the close of the public comment period on the PSH Ordinance inappropriately limited public comment on the PSH Ordinance, in violation of Public Resources Code (PRC) Section (§) 21003.1 and CEQA Guidelines §15004 which states:

(b) Choosing the precise time for CEQA compliance involves a balancing of competing factors. EIRs and negative declarations should be prepared as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment.

...

(c) The environmental document preparation and review should be coordinated in a timely fashion with the existing planning, review, and project approval processes being used by each public agency. These procedures, to the maximum extent feasible, are to run concurrently, not consecutively. When the lead agency is a state agency, the environmental document shall be included as part of the regular project report if such a report is used in its existing review and budgetary process.

Channel Law commented in our October 30, 2017 letter on the fact that failure to provide the public with a copy of the CEQA document during the public review period inhibited the ability of the public to comment on, or fully understand, the potential impacts of the proposed PSH Ordinance. In addition, requiring the public to separately comment on the PSH Ordinance and then subsequently on the MND for the project, unduly burdened the public, since as noted in the Channel Law letter, a full description of the components and sites affected by the PSH Ordinance

was not made available to the public during the comment period on the Ordinance.

1.2 The Planning Commission Made Changes To The PSH Ordinance After the MND Was Released For Comment

According to the Staff Report for the December 14, 2017 Planning Commission hearing on the PSH Ordinance, the City has made the following changes to the August 30, 2017 version of the PSH Ordinance, which was the version available to the public at the time the MND was released:

- References were added to State Density Bonus law to make clear that the ordinance is intended to create permanent supportive housing units consistent with state density bonus provisions. This revision ensures that the grant of any bonuses, incentives, or concessions under this ordinance shall not be considered an increase in density or other change which requires any corresponding zone change, general plan amendment, specific plan exception, or discretionary action. This does not supersede or in any way alter or lessen the effect or application of the Coastal Act.
- To ensure general plan land use consistency, the amendment to the PF Zone was revised to allow the application of the least restrictive adjacent zone, in lieu of the least restrictive zone within 1/4-mile radius of the project site.
- To more closely align with other incentives, a modification was made to allow for up to 20% relief in any other development standard not already specified, in lieu of 35% relief.
- The construction standards were revised to be more consistent with Mitigation Measures included in the Mitigated Negative Declaration prepared for the ordinance.
- The definition of a Qualified PSH Project was amended to reflect recent changes to definitions for project funding requirements under Measure HHH and ensure that these requirements are in alignment.
- The setback incentive was revised to respect prevailing front yards in residential zones.
- To further ensure high quality, pedestrian-scale design, additional design standards were added related to screening of parking structures.

While we are generally supportive of these changes, the modified PSH Ordinance was not made available to the public for comment concurrent with the release on the MND for the PSH Ordinance.

1.3 The Planning Commission Took Action on the Project on December 14, 2017 Prior to The Close of the MND Comment Period On December 20, 2017

The PSH Ordinance was considered by the Planning Commission on December 14, 2017, prior to the close of the 20-day comment period on the MND on December 20, 2017. At the Planning Commission hearing, recommended actions included (See **Appendix A, Attachment 2** – Audio Links Item 12):¹

RECOMMENDED 1. **Recommend** adoption of the proposed ordinance

¹Item CPC-2017-3409-CA <https://planning.lacity.org/InternetCalendar/pdf.aspx?Id=59215> See Attachment 2 – Item 12 with a link to the Audio of hearing: <https://planning.lacity.org/InternetCalendar/pdf.aspx?Id=59322>
<http://planning.lacity.org/StaffRpt/Audios/CPC/2017/12-14-2017/13%20CPC-2017-3409.mp3>

- ACTIONS:
- (Exhibit A);
 2. **Adopt** the staff report as the Commission report on the subject;
 3. **Adopt** the attached Findings;
 4. **Recommend** that the City Council FIND that pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including Mitigated Negative Declaration No. ENV-2017-3137-MND ("Mitigated Negative Declaration-) (Exhibit B.1), and all comments received, with imposition of mitigation measures, there is no substantial evidence that the project will have a Significant effect on the environment; FIND the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; FIND the mitigation measures have been made conditions on the project; and ADOPT the Mitigated Negative Declaration; and
 5. **Recommend** that the City Council FIND, based on their independent judgment, after consideration of the whole of the administrative record, including the SCAG 2016-2040 RTP/SCS PEIR, SCH No. 2015031035, certified on April 7, 2016 (EIR) and the Addendum prepared for the Permanent Supportive Housing Ordinance (Addendum) (Exhibit B.2), the project was assessed in the EIR and pursuant to the CEQA Guidelines, Sections 15162 and 15164 and the Addendum that no major revisions to the EIR are required and no subsequent EIR or negative declaration is required for approval of the project.

The Planning Commission took the actions recommended by Staff. As noted in the Letter of Determination dated December 19, 2017 for the PSH Ordinance included in **Appendix A, Attachment 2**, the Planning Commissions actions included the following finding (emphasis added):

1. Found pursuant to CEQA Guidelines Section 1507 4(b), after consideration of the whole of the administrative record, including Mitigated Negative Declaration No. ENV-2017- 3137-MND (Mitigated Negative Declaration), **and all comments received**, with imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; Found that the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; Found the mitigation measures have been made enforceable conditions on the project; and adopt the Mitigated Negative Declaration; and Adopted the Mitigated Negative Declaration and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;
- ...
4. Approved and recommended that the City Council adopt the proposed ordinance, as amended by the Commission, subject to review by the City Attorney as to form and legality; and

5. Adopted and recommended that the City Council adopt the attached Findings.

The Planning Commission's findings contain an untruth. The Planning commission could not have considered comments on the MND before approving the ordinance, since the Planning Commission acted before completion of the public comment period on the MND. This is a violation of CEQA Guidelines § 15004(b), which states:

- (2) To implement the above principles, public agencies shall not undertake actions concerning the proposed public project that would have a significant adverse effect or limit the choice of alternatives or mitigation measures, before completion of CEQA compliance. For example, agencies shall not:
 - (A) Formally make a decision to proceed with the use of a site for facilities which would require CEQA review, regardless of whether the agency has made any final purchase of the site for these facilities, except that agencies may designate a preferred site for CEQA review and may enter into land acquisition agreements when the agency has conditioned the agency's future use of the site on CEQA compliance.
 - (B) Otherwise take any action which gives impetus to a planned or foreseeable project in a manner that forecloses alternatives or mitigation measures that would ordinarily be part of CEQA review of that public project.

In addition to adopting findings regarding the MND, the Planning Commission also considered and approved use of a second environmental document for the project, an Addendum to the Program Environmental Impacts Report (PEIR) for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by the Southern California Association of Governments (SCAG).² This was clearly done in an effort to provide cover for the City's failure to both prepare an adequate MND for the project and to comply with MND process requirements specified in CEQA. This was included in the Planning Commission packet as a separate environmental document for the PSH Ordinance. The use of an Addendum was no doubt done in order to further frustrate the ability of the public to review and comment on the environmental document for the project, since an Addendum need not be circulated for public review. According to the Planning Commission's Letter of Determination included in **Appendix A, Attachment 2**, Planning Commission then took the following action at its December 14, 2017 meeting:

At its meeting of December 14, 2017, the Los Angeles City Planning Commission took the actions below in conjunction with the approval of the proposed ordinance:

...

- 2. Approve and recommend that the City Council find, based on their independent judgement, after consideration of the whole of the administrative record, including the SCAG 2016-2040 RTP/ SCS PEIR (SCH No. 2015031035), certified on April 7, 2016 (EIR) and the Addendum prepared for the PSH

² A copy of the PEIR is available at: <http://scagrtpscs.net/Pages/DRAFT2016PEIR.aspx>
Copies of the SCAG's two Addendums are available at:
<http://scagrtpscs.net/Pages/FINAL2016PEIR.aspx>
<http://scagrtpscs.net/Pages/2016RTPSCSAmendments.aspx>

Ordinance (Addendum), the project was assessed in the EIR and pursuant to the CEQA Guidelines, Sections 15162 and 15164 and the Addendum that no major revisions to the EIR are required and no subsequent EIR, or negative declaration is required for approval of the project;

Based on a review of subsequent Planning Commission meeting minutes (see **Appendix B**), it does not appear that the Planning Commission has rescinded its findings, despite the untruth contained therein.

1.4 Failure to Address Channel Law's December 20, 2017 Comments Regarding Procedural and Substantive Defects in the November 27, 2017 MND Circulated For Public Review and Comment From November 30, 2017 to December 20, 2017 and Associated Process

The MND for the PSH Ordinance was released for public review and comment on November 30, 2017 for a 21-day period ending December 20, 2017. As we noted in our comment letter on the MND dated December 20, 2017 incorporated herein by reference and included as **Appendix A**, there were a number of procedural and substantive defects in the MND and MND process:

1. Despite the fact that the project was of area-wide significance, the City circulated the MND for only 21-day, rather than the 30-days required for a project of area-wide significance by CEQA.
2. Violation of CEQA Guidelines § 15072(b) - The City Failed To Provide The Notice As Required By CEQA To Channel Law
3. The City's Notice of Intent to Adopt the MND Failed to Comply with the Noticing Requirements of CEQA Guidelines Section 15070(g)
4. The City and Planning Commission Findings Inappropriately Relied In-Part On An Addendum Prepared By The City to An EIR Prepared By Another Agency
5. Use Of Both An MND and Addendum For The Same Project Is Inappropriate
6. Addendum Process For the Addendum Presented to the Planning Commission Failed To Comply With CEQA
7. Violation of CEQA Guidelines §15153 – Use Of An EIR From an Earlier Project
8. If the City was Going to Hide Behind the TRP/SCS PEIR The City Should Have Tiered Off the RTP/SCS PEIR Rather Than Prepared an Addendum to the RTP/SCS PEIR
9. The Planning Commission Staff Report and MND Provide Unclear and Conflicting Information Regarding Application of the PSH Ordinance to the Venice Dell Pacific Site and the Thatcher Yard Site
10. Inadequate Project Description – Failure to Identify All Potential PSH City Owned Land
11. Inadequate Analysis of Impact on Crime and Public Services
12. Inadequate Analysis of Impact on Property Values and Resulting Physical Changes
13. Inadequate Analysis of Increase in Water Demand
14. Need for Analysis of Growth Inducing Impacts
15. Failure to Address Potential for Cumulative Impacts

Since the MND that has been re-circulated for public review and comment is the same November 27, 2017 MND originally circulated for public review and comment, it does not address the substantive issues identified in our December 20, 2017 comment letter. While re-circulation addresses the first two of our concerns and the revised Notice of Intent to Adopt addresses several

of the noticing defects we identified in our comment letter, our remaining concerns have not been addressed.

1.5 Failure To Rescind Planning Commission Findings Despite Falsehood Contained In Those Findings

As we explained in our December 20, 2017 comment letter, the City did not proceed in the manner prescribed by law regarding the environmental documentation for the PSH Ordinance and the Planning Commission's findings, approval and recommendation of those documents. The City therefore needed to take the following actions:

- Void the actions taken by the Planning Commission regarding the PSH Ordinance and the associated environmental documents;
- Prepare a single environmental document for the PSH Ordinance and circulate that document for public review in accordance with the requirements for projects of area-wide significance;
- Provide Notice of the Availability of the revised document to all those who have comment on the environmental documents or the PSH Ordinance, including Channel Law.
- Allow the Planning Commission to reconsider the re-circulated MND and issue new findings.

While the City has re-circulated the November 27, 2017 MND for public review and comment, neither the Notice of Intent to Adopt (included as **Appendix C** to this letter), or minutes from any Planning Commission meetings after its December 14, 2017 actions on the MND and Addendum through the release of the re-circulated November 27, 2017 MND (**Appendix B**), indicate that the Planning Commission has voided its inappropriate findings, approvals and recommendations regarding the PSH Ordinance. Furthermore, there is no indication in the Notice that the City intends for the November 27, 2017 MND to be the sole environmental document for the proposed project. Our objections to the use of an Addendum included in our December 20, 2017 letter remain, and are incorporated herein by reference and detailed in **Appendix A** to this letter.

1.6 Problems With The City's January 8, 2018 Notice of Intent to Adopt the MND

The revised Notice of Intent to Adopt the MND (Mitigated Negative Declaration-NG-17-140-PL: ENV-2017-3137) received by Channel Law is included as **Appendix C** to this letter. There are several problems with the Notice. First, the Notice does not specify where comments are to be sent. While not specifically required by CEQA Guidelines § 15070(g), this information is common sense and is necessary for a City like Los Angeles, which is very large, and has an unusual planning and city council subcommittee structure. Unlike smaller cities, it is not clear where comments should be sent. Should they be sent to the Planning Department Environmental Review Unit, or to the City Clerk, given that the next step in the process, per the Notice, is the Council's PLUM committee?

Second, statements in the Notice create a misperception regarding the potential for particular sites potentially affected by the ordinance to be on any lists enumerated under Government Code Section 65962.5. The Notice states:

Pursuant to CEQA Guidelines Section 15072(g)(5), the mitigated negative declaration (MNO) does not identify any particular site on any of the lists enumerated under Government Code Section 65962.5, including lists of hazardous waste facilities, land designated as hazardous waste property, and hazardous waste disposal sites, and the information in the Hazardous Waste and Substances Statement required under subdivision (f) of that section.

However, the MND identifies the potential for PSH sites to be included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and includes a mitigation measure to address this.³ The environmental Notice published by the City fails to identify this, per CEQA Guidelines § 15070(g)(5). The Notice is therefore still deficient.

2. SUBSTANTIVE ISSUES - COMMENTS ON THE ENVIRONMENTAL DOCUMENTS FOR THE PSH ORDINANCE

2.1 Project Splitting – Failure to Analyze The Whole of the Action – Production of PSH Housing Per City’s Comprehensive Homeless Strategy

CEQA Guidelines Section 15003(h) requires: “The lead agency must consider the whole of an action, not simply its constituent parts, when determining whether it will have a significant environmental effect. (*Citizens Assoc. For Sensible Development of Bishop Area v. County of Inyo* (1985) 172 Cal.App.3d 151).” The City has failed to comply with this requirement when analyzing the proposed project, which should be defined as the City’s provision of housing for the homeless, including PSH units. As noted on page II-17 of the MND:

101-1

The PSH Ordinance would streamline the development process for PSH units including streamlining the environmental review process, expediting the permit process and by removing zoning hurdles.

According to page II-4 of the MND:⁴

The City's Comprehensive Homeless Strategy(fn2) identified a need to build at least 1,000 PSH units per year, an increase of up to 700 units from its current average production rate of approximately 300 units per year. Lack of adequate funding has been the primary barrier to achieving this goal. Exacerbating this constraint is the extent to which PSH projects

³ MND pages III-5 and IV-37 to IV-39.

⁴ The footnotes (fn) in the MND for the quoted passage are:

2 Comprehensive Homeless Strategy, City of Los Angeles, 2015

http://clkrep.lacity.org/onlinedocs/2015/15-1138-SI_misc_I-7-16.pdf

3 Affordable Housing Cost Study, Analysis of the Factors that Influence the Cost of Building Multi-Family Affordable Housing in California, The California Department of Housing and Community Development, the California Tax Credit Allocation Committee, the California Housing Finance Agency, and the California Debt Limit Allocation Committee, October 2014 https://www.novoco.com/sites/default/files/a_toms/files/ca_development-cost-study_101314.pdf

4 On July 1, 2016, Governor Brown signed legislation enacting the No Place Like Home program to dedicate \$2 billion in bond proceeds to invest in the development of permanent supportive housing for persons who are in need of mental health services and are experiencing homelessness, chronic homelessness, or who are at risk of chronic homelessness.

often require lengthy planning entitlement and processing times, where project costs are driven up and construction completion may be delayed as long as one to two years.(fn3)

A number of new dedicated funding sources have recently been approved at the state and local levels:

- \$2 billion bond in the California "No Place Like Home" initiative;⁴
- \$1.2 billion local (City of Los Angeles) bond measure (Measure HHH) approved in November 2016, generated over a period of ten years;
- County-wide Measure H, approved in March 2017, provides a 0.25 percent sales tax which could generate \$355 million annually for ten years to fund homeless services and prevention, including rental subsidies and supportive services associated with PSH.

These revenue streams will help close the funding gap for supportive housing. Based on historical gap-funding sources and construction trends, the City anticipates that these funding sources will contribute to the production of 1,000 new PSH units per year, over a period of ten years.

According to page II-12 of the MND:⁵

The City estimates of the number of PSH units necessary to close the gap between what is available and what is needed to house the existing homeless population is approximately 9,050 PSH units for singles and 845 units for families.(fn12) PSH for single individuals represents the highest need the City is facing relative to the housing gap for the City's homeless. Housing current numbers of Los Angeles homeless singles will require more than doubling the current PSH supply. It is anticipated that recently adopted local gap-funding sources (Measure HHH and Measure H) will help meet the need for PSH by generating a total of 10,000 units of PSH.

However, according to page II-5 of the MND:

Based on this study, and due to the fact that the construction of PSH is constrained by the availability of public funding, it is reasonably foreseeable that the Proposed PSH Ordinance could, with the most generous assumptions (and conservative for purposes of environmental review), result in the construction of an additional 200 units per year of PSH in addition to the 1,000 units per year anticipated to result from Measure HHH and other previously approved gap-funding projects. Therefore, for purposes of the City's analysis of the PSH Ordinance in this MND, the City is analyzing the impacts of construction and operation of 2,000 units constructed over a 10-year period (200 units/year). Construction of the other 10,000 or 1,000 units a year for the next 10 years is part of the cumulative development allowed by the previously approved gap funding projects, identified above.

⁵ Footnote 12 in the MND states:

12 Comprehensive Homeless Strategy, City of Los Angeles, 2015
http://clkrep.lacity.org/onlinedocs/2015/15-1138-SI_misc_1-7-16.pdf

The MND does not make clear why the PSH Ordinance would only apply to 200 units per year, and not the full number of PSH units anticipated as a result of gap funding. According to pages II-17-II-18 of the MND (emphasis added):

The City's method to estimate the 200 units a year potentially resulting from the PSH Ordinance is consistent with CEQA legal decisions that recognize that a City is not required to reanalyze the effect of ordinances or other projects that are **already approved** and are not being amended or are intended to be amended with the project. See, e.g., *Black Property Owners Assn. v. City of Berkeley* (1984) 22 Cal.AppAth 974, 985 (holding that a city was not required to analyze the effects of a rent control ordinance in its update to its housing element where there were no changes proposed to its rent control laws). Again, **Measure HHH, along with other previously approved cumulative gap-funding projects, are existing projects that will foreseeably result in the construction of up to 1,000 units a year for the next 10 years.** (See discussion above related to historical construction of 300 PSH units a year and cumulative impact discussion for analysis of these cumulative gap-funding projects.) Additionally, the City is not modifying its existing land use plans and is making limited amendments to its zoning ordinance **to in substantial part eliminate discretionary review for most PSH projects** and otherwise, facilitate the ability to construct PSH projects on PF zoned property and potentially larger PSH projects. As discussed, **PSH projects are dependent on gap-funding** and although the City may be modifying some of the allowed density restrictions (i.e. minimum lot area per du or guest room), the number of PSH units is not expected to go beyond the additional 200 units. Additionally, while PSH developments may be slightly larger, historical development of PSH projects demonstrates that applicants prefer smaller projects. The reasonably foreseeable result of these amendments is to potentially obtain larger PSH projects and up to 200 additional units, as explained above.

There are a number of problems with this statement. First, there has been no showing the additional 1,000 units per year (10,000 over 10 years) have been approved. Second, the PSH Ordinance constitutes a change to the zoning code and this is not the same as the unchanged rent control ordinance in the example. Third Measure HHH is a funding mechanism, passed by the voters, not a development project. Voter approved funding is not subject to CEQA review, but that does not mean that the funded projects are not. Fourth, the environmental document fails to identify previously approved gap-funding projects or to show that the 10,000 anticipated units have been previously approved and received CEQA review. Fourth, if the PSH Ordinance eliminates discretionary review for PSH project, then the potential environmental impacts of such projects should be addressed in the environmental document for the discretionary project/approval eliminating future discretionary review. Fifth, the paragraph states that PSH projects are dependent on gap funding, but fails to distinguish projects covered by the PSH Ordinance from other gap-funded PSH projects.

The MND does not cite any environmental documents analyzing the potential impacts of the construction of the other 10,000 units to be constructed over the next 10 years, or clarify why the PSH Ordinance would only apply to 200 units per year. It would therefore appear that the environmental document should address the potential environmental impacts of the combined actions the City is taking to implement its Comprehensive Homeless Strategy, and the construction of the total number of PSH and other homeless housing types that are part of the City's homeless-

elimination efforts. At a minimum the environmental document should analyze construction of the full 1,200 units per year, for a total of 12,000 units. To do otherwise would be to fail to analyze the project as a whole and to engage in project splitting when it comes to the City's production of PSH units, and any other types of homeless housing units.

The need for the City to address its full Homeless Housing Strategy housing production implementation measures in a single environmental document is further evidenced by a recent Los Angeles Times article entitled: "A plan to house L.A.'s homeless residents could transform parking lots across the city." This article is included as **Appendix D**. It therefore appears that the MND for the PSH Ordinance is an example of project splitting. This is not cured by the limited statements regarding cumulative impacts contained in the MND (see **Section 2.18**)

2.2 Project Splitting – Failure to Analyze The Whole of the Action – City's Motel Conversion Ordinance

Although the MND discusses the City's Residential Hotel Unit Conversion and Demolition Ordinance on MND page II-22, it fails to discuss the City's proposed Interim Motel Conversion Ordinance as part of the larger housing production strategy for the homeless. According to the public hearing notice for the Interim Motel Conversion Ordinance, the City has assigned the following case numbers to that Ordinance: CPC-2017-3409-CA and ENV-2017-3410-ND. This would indicate that the City is preparing a separate Negative Declaration for this Ordinance. Rather than address the Motel Conversion Ordinance as part of the project, the MND treats it as a cumulative project. This is an additional example of project splitting.

101-2

2.3 Flawed Project Assumptions – Potential Underestimation of Impacts

The MND's following assumptions regarding the size of PSH projects contained on pages II-22 to II23 of the MND, have not been supported by substantial evidence.⁶

101-3

Assumptions Regarding Size of PSH projects

Over the next 10 years it is assumed that, with the proposed PSH ordinance, 2,000 (200 per year) new PSH units would be developed as a result of the Project. Units developed as a result of the PSH Ordinance would occur in a combination of new (i.e., ground up) and rehabilitation.

The following assumptions are based on existing patterns of development of PSH units:

- Current PSH projects average 60 units per project; however, it is anticipated that the PSH Ordinance will result in slightly larger projects than the City has historically seen, approximately 75 units per project.

⁶ MND footnote (fn) 14 states:

14 Unit size of 200 square feet based on California Tax Credit Allocation Committee Regulations Implementing The Federal And State Low Income Housing Tax Credit Laws; California Code Of Regulations; Title 4, Division 17, Chapter 1; May 17, 2017 <http://www.treasurer.ca.gov/ctcac/programreg/2017/20170517/clean.pdf> page 66 minimum of 200 square feet for special needs projects

- On an annual basis, approximately 71 percent of all PSH projects would be new construction and 29 percent of all projects would be rehabilitation of existing structures.
- The PSH Ordinance requires a minimum of 50 percent of the total units as PSH. However, based on existing projects and Measure HHH funding allowance, it is assumed that 85% of the units would be PSH units (with a unit size of approximately 200 square feet)(fn14) and 15% of units would be affordable for families at risk of becoming homeless (with a unit size of approximately 1,000 square feet).

The MND’s assumption that PSH developments would be approximately 75 units per project is not supported by substantial evidence, and if this were the typical project size, there would be no need for the Ordinance to include a CEQA Exemption for individual projects with up to 120 units (200 in downtown), as the existing CEQA exemption for low income project of up to 100 units would be adequate. These flawed project assumptions have the potential to result in the underestimation of project impacts.

2.4 Inadequate Project Description – Failure to Adequately Disclose and Analyze New CEQA Exemption Created By the Project

According to page II-10 MND, of the PSH Units completed between 2008 and 2016, 68% of the units required discretionary approvals. This would change under the PSH Ordinance. Although the MND does provide some information on the fact that the PSH Ordinance would make many PSH project approvals ministerial, and that it provides an exemption from Site Plan Review requirements, it may not be clear to the reader that the PSH Ordinance creates a new CEQA exemption. According to page II-13-II-14 of the MND:

101-4

Application and Approval. Procedures for Qualified Permanent Supportive Housing Projects are established as:

The process whereby the applicant shall submit an application on a form developed by the Department of City Planning (DCP) that contains basic information about the project, the owner and/or applicant and conformance with this section. The Director of Planning shall review all applications for compliance with the definitions, requirements, zoning compliance, and adherence to the performance standards. The application shall be approved by the Director of Planning through a ministerial Public Benefit process if the eligibility criteria and performance standards are met.

Projects utilizing other affordable housing incentive programs would not be eligible for this application and approval process. For projects requesting additional waivers of development standards that would otherwise physically preclude the construction of the Qualified Permanent Supportive Housing Project, the discretionary application procedures in Section 12.22 A.25(g)(3) of the LAMC would apply.

Requirements. A Qualified Permanent Supportive Housing project must comply with the following requirements:

- (1) *Supportive Services.* Projects shall provide documentation that describes the level and types of services that will be provided onsite and/or offsite. Prior to project approval, the application shall provide a signed funding commitment letter from a local public agency, verifying that the Supportive Services will be provided.
- (2) *Affordable Housing Covenant.* Projects shall record a covenant acceptable to the Housing and Community Investment Department (HCIDLA) that reserves and maintains the number of dwelling units designated as restricted affordable for at least 55 years from the issuance of the Certificate of Occupancy by the Department of Building and Safety.
- (3) *Housing Replacement.* Projects shall meet any applicable dwelling unit replacement requirements of California Government Code Section 65915(c)(3), as verified by the Housing and Community Investment Department (HCIDLA) prior to the issuance of any building permit.
- (4) *Public Notification.* Applicants shall be required to provide the following public notice of the application:
 - (i) Provide written notice of the application to the abutting property owners and the Council District Office with jurisdiction over the site; and
 - (ii) Post a public notice of the project application on the project site.

According to page II-17 of the MND

Amendment to Section 16.05 D Site Plan Review

An amendment is proposed to Section 16.05 D of the LAMC to provide an exemption from otherwise applicable Site Plan Review procedures for Qualified Permanent Supportive Housing Projects with fewer than 120 units (fewer than 200 units if located in the Greater Downtown Housing Incentive Area) and developed pursuant to the requirements and procedures in Section 14.00 A.11 of the LAMe.

The project description in the MND thus fails to adequately make clear that the Ordinance creates a new CEQA exemption for PSH projects in two sections of the Ordinance, and that this new exemption is inconsistent with Public Resources Code (CEQA) Section 21159.21 and does not require compliance with Public Resources Code (PRC) Section 21159.23. PRC Section 21159.21 provides the criteria for qualifying for housing project exemptions⁷ and PRC Section 21159.23 provides for an exemption for low-income housing for residential housing consisting of 100 or fewer units.⁸ Pursuant to CEQA a low-income housing project would not qualify for an exemption “if there is a reasonable possibility that the project would have a significant effect on the environment or the residents of the project due to unusual circumstances or due to the related or cumulative impacts of reasonably foreseeable projects in the vicinity of the project.”⁹ Pursuant to PRC Section 21159.21, a low income housing project would not qualify for an exemption if it is inconsistent with any applicable general plan, specific plan or local coastal program;

⁷ See also CEQA Guidelines Section 15192.

⁸ See also CEQA Guidelines Section 15194.

⁹ CEQA (Public Resources Code) 21159.23(c).

community-level environmental review has not been adopted or certified; existing utilities are not adequate to serve the project; the site is on a list of hazardous materials sites; the project would impact historical resources; or is in a hazards area.

In contrast, the Ordinance provides for an exemption for PSH projects, by adding the following language to Article 6.1 – Review of Development Projects, Section 16.05D – Exemptions,¹⁰ via Section 4 of the Ordinance:

Section 4. Subdivision 8 of Subsection D of Section 16.05 of the Los Angeles Municipal Code is added to read as follows:

8. A Qualified Permanent Supportive Housing Project developed pursuant to Section 14.00 A.11 of this Code and containing no more than 120 units, or no more than 200 units if it is located in the Greater Downtown Housing Incentive Area.¹¹

The Ordinance thus allows for exemption of PSH projects with a larger number of units than would be allowed under existing CEQA exemptions. This change to existing CEQA exemptions, to create a less restrictive exemption for PSH projects is a discretionary action subject to CEQA review, and should be fully described in the MND and analyzed in the environmental document for the PSH Ordinance. Since the number of projects that would be subject to CEQA review would be reduced by the Ordinance, it is important that the environmental document for the Ordinance provide environmental review of such projects, ideally in the form of a Program EIR.

2.5 Inadequate Project Description – Failure to Identify All Potential PSH City PF Owned Land

In terms of City-owned property and sites in the Public Facilities Zone (PF), the environmental documents identify only the seven Round One Properties, and indicates that: “The CAO intends to continue to identify suitable City owned properties on an annual basis, which will be included in Request for Proposals to the City’s qualified list of developers.”¹² The MND cannot be used as the environmental clearance for PSH projects unless they are more specifically identified in the MND; Figure 4 is insufficient.

101-5

2.6 Inadequate Project Description – Failure to Identify Development Potential of Round One Properties

The MND needs to explain which Round One Properties (MND Table 5, MND pages 38-39) will be subject to separate environmental review, which are addressed in the MND, and which are considered exempt from environmental review with and without the PSH Ordinance. The MND needs to identify the development potential of the Round One Properties. The environmental document for the project needs to provide site-specific analysis for known project sites. It does

101-6

¹⁰ Section 16.05D states: “Unless made discretionary by any other provision of law, the approval of any building permit for a development project which does not exceed the thresholds set forth in this subsection and Section 12.24U14 is ministerial and exempt from the requirements of the California Environmental Quality Act.

¹¹ Page 9, Draft Ordinance 8/30/2017.

¹² Addendum, page 39.

not do so, and is therefore inadequate.

2.7 Project Impacts - 1. Aesthetics

The discussion for Checklist Item 1(d) states that: “The Proposed Ordinance would not directly introduce new sources of glare as building materials would be non-reflective materials such as wood, brick, and similar materials. Therefore glare impacts would be less than significant. However, there is nothing in the ordinance that precludes the use of reflective materials and limits exterior materials to wood, brick or similar materials. The conclusion is therefore not supported by substantial evidence.

101-7

2.8 Project Impacts – 2. Air Quality

The MND at page IV-6 states that:

It should be noted that each individual PSH development project would in all likelihood fall below the City's air-quality-related screening criteria for projects eligible for a Categorical Exemption (80 units and less than 20,000 cubic yards of soil export) and therefore would not foreseeably result in significant adverse impact on air quality. The City's air quality screening criteria for preparation of Categorical Exemptions is based on numerous models of various projects; significant air emissions have not been identified for projects of this size (80 units) and less. As discussed above, based on historical PSH projects, PSH development of more than 75 units is unlikely. Projects with more than 120 units (200 units in Greater Downtown) are subject to site plan review and additional environmental review.

However, the PSH ordinance would create a new City CEQA exemption for projects of up to 120 units (200 units in Greater Downtown). The MND’s assumption that PSH developments would be less than 80 units is not supported by substantial evidence and, if this were the typical project size, there would be no need for the Ordinance to provide an CEQA exemption for 120 units (200 in downtown) as the existing CEQA exemption would be adequate.

101-8a

(a) Conflict with or obstruct implementation of the applicable air quality plan?

The analysis states that: “The Proposed Ordinance would not add any new population to the region.” This statement and assumption is not supported by substantial evidence. As discussed in **Section 2.20** of this letter, research indicates that the provision of PSH housing may induce immigration of additional homeless persons into the area. The PSH Ordinance and PSH construction in the City may result in population increases that have not been addressed in the projections underlying the Air Quality Management Plan (AQMP). Evidence exists to support an argument that the PSH Ordinance is not consistent with the AQMP. In addition, the analysis should address the full number of PSH units anticipated to be developed per year over the next ten years.

101-8b

b) Violation of any air quality standard or contribute substantially to an existing or projected air quality violation?

The analysis is fatally flawed because it does not analyze the project as a whole (the full number of PSH and other homeless housing units be constructed per year and over the life of the project – see **Section 2.1**). The model runs have not been included as an appendix to the MND; the reader is therefore precluded from checking the assumptions in the model runs.

101-8c

2.9 Project Impacts – 4. Biological Resources

The discussion under 4(a) states the following regarding impacts under the Migratory Bird Treaty Act (MBTA):

Construction activities that occur pursuant to the Proposed Ordinance would be required to comply with the provisions of the MBTA as detailed in the Regulatory Compliance Measure RCM BIO-1. Adherence to RCM BIO-1 would ensure that if construction occurs during the breeding season, appropriate measures would be taken to avoid impacts to nesting birds if present. Thus impacts would be less than significant, and no mitigation is required.

Since the PSH Ordinance will render a number of projects exempt from CEQA review, how will Regulatory Compliance Measure RCM BIO-1 and BIO-2 be enforced? For any “Regulatory Compliance Measure” cited in the MND, the specific reference for the regulatory requirements (code, ordinance, etc) should be cited so the reader can be sure the specified measure is in fact a regulatory requirement and not a mitigation measure. As written the PSH Ordinance does not require compliance with this measure. The potential for impacts remains.

101-9a

The discussion under 4(d) states that there is an absence of habitat in High Quality Transit Areas (HQTAs) within the City of Los Angeles and that no significant wildlife movement occurs through potential PSH sites. However, Figure 4 of the MND appears to show eligible parcels along the I-405 through the Santa Monica Mountains. There are wildlife corridors and important habitat linkages along this segment of the I-405.¹³ This segment of I-405 is considered a HQTA.¹⁴ The statement is not supported by substantial evidence and the potential for impacts remains.

101-9b

2.10 Project Impacts – 5. Cultural Resources

Since the PSH Ordinance will render a number of projects exempt from CEQA review, how will Mitigation Measures MM-CUL-1, MM-CUL-2, MM-CUL-3 be enforced? As written the PSH Ordinance does not require compliance with this measure. The potential for impacts remains.

101-10

2.11 Project Impacts – 6. Geology and Soils

Since the PSH Ordinance will render a number of projects exempt from CEQA review, how will Regulatory Compliance Measure RCM-GEO-1, RCM-GEO-2, RCM-GEO-3, RCM-GEO-4, RCM-GEO-15/HYD-1, be enforced? For any “Regulatory Compliance Measure” cited

101-11

¹³ See: Eastern Santa Monica Mountains Habitat Linkage Planning Map, Santa Monica Mountains Conservancy, Adopted January 23, 2017, Item 13: <http://smmc.ca.gov/attachment.asp?agendaId=549>; and, Sepulveda Pass Widening Project, Final Environmental Impact Report/Environmental Impact Statement and Section 4(f) Evaluation. http://www.dot.ca.gov/d7/env-docs/docs/Final%20LA405DOC_022208.pdf

¹⁴ See: http://sustain.scag.ca.gov/Documents/HQTA/Maps/LA_MidCityWestsidescagHQTAeligible.pdf and http://sustain.scag.ca.gov/Documents/HQTA/Maps/LA_SanFernandoValley_scagHQTAeligible.pdf

in the MND, the specific reference for the regulatory requirements (code, ordinance, etc) should be cited so the reader can be sure the specified measure is in fact a regulatory requirement and not a mitigation measure. For example, it is unclear that the following measure is, in fact, a regulatory requirement:

ReM GEO-3: Applicants to provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor.

2.12 Project Impacts – 8. Hazards and Hazardous Materials

Since the PSH Ordinance will render a number of projects exempt from CEQA review, how will Mitigation Measures MM-HAZ-1 be enforced? As written the PSH Ordinance does not require compliance with this measure. For Item 8(e) the MND contains the following conclusory statement, which is not supported by substantial evidence:

101-12a

101-12b

Three airports are located within the City of Los Angeles: two public and one general aviation, respectively they are: Los Angeles International (LAX) and Van Nuys, and Whiteman Airport. Development in accordance with the PSH Ordinance is anticipated to be located in HQTAs away from airport clear zones and accident potential zones. No impact would occur.

The MND should include figures overlaying the PSH eligible parcels shown in Figure 4, and the relevant airport clear and accident potential zones. Given the level of detail provided in Figure 4, it is not possible for a reader of the MND to perform this analysis.

For Item 8(h) the MND relies on the statement that PSH projects would be located in HQTAs and therefore not in hilly or mountainous areas. However, as shown on the Southern California Association of Government’s maps of the HQTA’s¹⁵, large parts of the City, including some hilly areas, are located within HQTA. The statement is not supported by substantial evidence and the potential for impacts remains.

101-12c

For Item 8(g) the MND relies on the statement that PSH projects would be located in HQTAs and therefore not within a 100-year flood hazard area. However, as shown on the Southern California Association of Government’s maps of the HQTA’s¹⁶, large parts of the City, are located within HQTA. The statement is not supported by substantial evidence, as there has been no showing in the MND that HQTA areas are all outside of the 100-year flood zone; the potential for impacts remains. Similarly the statement in 8(i) that development in accordance with the PSH Ordinance would result in no impacts related to the failure of a levee or dam or by inundation by seiche, tsunami, or mudflow is not supported by substantial evidence. The potential for impacts remains.

101-12d

2.13 Project Impacts – 12. Noise

Since the PSH Ordinance will render a number of projects exempt from CEQA review,

101-13a

¹⁵ <http://sustain.scag.ca.gov/Pages/HQTA.aspx>
¹⁶ <http://sustain.scag.ca.gov/Pages/HQTA.aspx>

how will compliance with the Regulatory Compliance Measures be enforced? How will Mitigation Measures MM-NOI-1 be enforced? As written the PSH Ordinance does not require compliance with this measure. RCM-NOI-2 states that (emphasis added): “LAMC Sections 111.0 through 116.01 require that construction noise greater than 75 dBA at 50 feet is prohibited between the hours of 7 am and 10 pm within 500 feet of a residential zone **unless compliance is technically infeasible.**” Any measure that includes the out of technical infeasibility is moot, and therefore cannot be relied on to reduce potential impacts to less than significant.

101-13b

2.14 Project Impacts – 13. Population and Housing

The analysis states that the “PSH Ordinance would not induce substantial population growth, as it would serve an existing population located within the City of Los Angeles.” This statement and assumption is not supported by substantial evidence. As discussed in **Section 2.20** of this letter, research indicates that the provision of PSH housing may induce immigration of additional homeless persons. The PSH Ordinance and PSH construction in the City may result in population increases and these increases will involve additional in migration of homeless persons, a group largely dependent on publically funded housing. This must be addressed in the environmental document for the project.

101-14

The statement in MND Section 13, that: “Some homeless population could seek to move in to the area in search of PSH housing, but this population is not very mobile and it is not anticipated to be a large impact” is not supported by substantial evidence. According to the Los Angeles Homeless Services Authority (Homeless Authority), 12% of the homeless in the County (4,241 persons) have been here for less than one year.¹⁷ The following figure from page 40 of the Greater Los Angeles Homeless Count – Presentation – Los Angeles County and Continuum of Care, Los Angeles Homeless Services Authority, shows the length of time members of the homeless population have spent in the area. In addition, the figure from page 41 of that same presentation, also reproduced below, shows that only approximately 70 percent of the areas homeless population lived in Los Angeles County before becoming homeless. It should also be noted that, according to the Los Angeles Services Authority, homelessness in Los Angeles County has increased 23% since 2016. The potential for population and housing impacts remains.

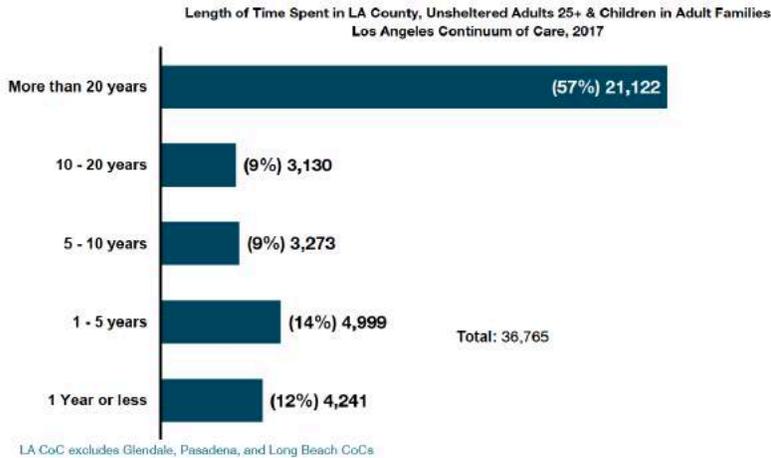
¹⁷ Page 40, Greater Los Angeles Homeless Count – Presentation – Los Angeles County and Continuum of Care, Los Angeles Homeless Services Authority, available at: <https://www.lahsa.org/documents?id=1385-2017-homeless-count-results-los-angeles-county-presentation.pdf>

Length of Time in LA County

Length of Time Spent in LA County by year similar in 2016

Geography:
LA CoC

Population:
Unsheltered Adults 25+
and Children in Adult
Families

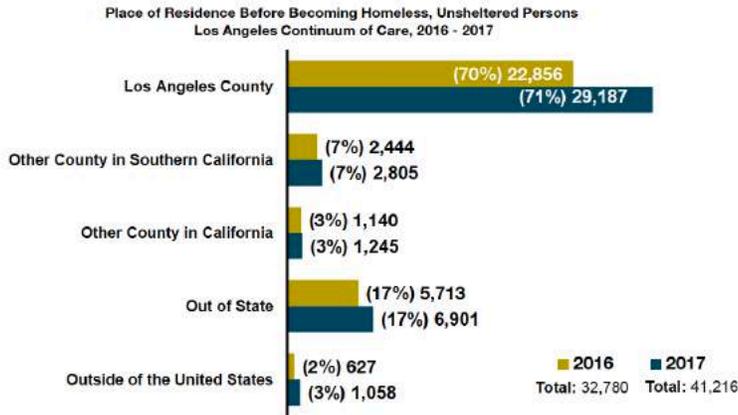


2017 HOMELESS COUNT RESULTS 40

Place of Residence Before Becoming Homeless

Geography:
LA CoC

Population:
Unsheltered



2017 HOMELESS COUNT RESULTS 41

2.15 Project Impacts – 14. Public Services (Police Protection)

As discussed in Section 2.14 of this comment letter, the assumption that the proposed project will not induce population growth is not supported by the evidence.

In addressing whether it is appropriate to increase the size of the low-income housing (i.e. PSH) projects eligible for an exemption, the environmental document for the Ordinance should address the fact that the Minnesota Housing Finance Agency’s Research and Evaluation Unit in their review of housing studies found:¹⁸

101-15

Impact on Neighborhood Crime

Research on the relationship between affordable housing and crime identifies project scale as the most important factor in determining the impact on neighborhood crime rates. Multiple studies find that smaller projects (typically less than 50 units) have no impact on neighborhood crime, but that larger projects may result in increased crime. This finding was common across multiple types of affordable housing, including non-profit rental housing, public housing, and supportive housing.

The PSH Ordinance thus has the potential to result in an increase in crime, and thus police services.

2.16 Project Impacts – 17. Tribal Cultural Resources

Since the PSH Ordinance will render a number of projects exempt from CEQA review, how will Mitigation Measures MM-TCR-1 be enforced? As written the PSH Ordinance does not require compliance with this measure. The potential for impacts remains.

101-16

2.17 Project Impacts – 18. Public Services

CEQA Guidelines Section 15155 requires the City to consult with the applicable water agency for any water-demand project, including residential development of more than 500 units, as part of the preparation of the environmental document for the project (in this case the Ordinance). Given that the intent of the Ordinance is to increase the production of PSH, with a goal of at least an additional 2000 units over 10 years, and PSH gap funding would provide for an additional 10,000 units, as part of the preparation of the environmental document for the Ordinance, the City should have consulted with the applicable water agency to determine if the intended effects of the Ordinance were included in the most recently adopted urban water management plan and to prepare a water assessment approved at a regular or special meeting of that governing body. The MND does not demonstrate that the required consultation has taken place.

101-17

2.18 Mandatory Findings of Significance - 19(b). Cumulative Impacts

The MND has not addressed the potential impacts of the additional 10,000 PSH units anticipated to be constructed as a result of Measure HHH in either its analysis of the proposed project, or in its cumulative impacts analysis. The MND is thus fatally flawed. According to page II-17 of the MND (emphasis added):

101-18

The PSH Ordinance could reasonably foresee ably, with the most generous (and

¹⁸ Discussion Paper, Impact of Affordable Housing on Communities and Households, Minenesota Housing Finance Agency, page 4.

conservative) assumptions, result in approximately 200 units in addition to the 1,000 a year units anticipated to result from the previously approved gap-funding projects. Therefore, for purposes of the City's analysis of the PSH Ordinance, the City is analyzing impacts of 2,000 units constructed over a 10-year period (200 units/year). Construction of the other 10,000 units or 1,000 units per year for the next 10 years is assumed to be part of **cumulative development** in the impact analysis.

However, the stated analysis of the other 10,000 units is not contained in either the project impacts analysis or in the MND's discussion of item 19. Mandatory Findings of Significance, part (b) Cumulative Impacts.

As previously noted, the City should prepare an environmental document that addresses the impact of all of its homeless housing production efforts. To do otherwise is to engage in project splitting.

The MND cannot rely on the 2016 RTP/SCS PEIR as its cumulative analysis. MND page IV-75 states that the: "2016 RTP/SCS PEIR identifies the anticipated impacts of cumulative development through 2040 throughout the region," and indicates that overall cumulative development in the City could result in significant impacts. However, the MND fails to identify the significant cumulative impacts identified in the 2016 RTP/SCS PEIR for either the region or the City. As explained in the Executive Summary to the Draft RTP/SCS PEIR, the RTP/SCS would create significant and unavoidable impacts related to the following topics:

- **Aesthetics** (Scenic Vistas, Scenic Highways, Visual Character, Light and Glare/Shadow and Shadow)
- **Air Quality** (Criteria Pollutants Emissions and Construction Emissions)
- **Biological Resources and Open Space** (Special Status Species and Habitat, Natural Lands, Loss of Open Space)
- **Cultural Resources** (Historical Resources, Archeological Resources, Paleontological Resources and Human Remains)
- **Geology, Soils, and Mineral Resources** (Seismicity, Soil Erosion, Expansive Soils, and Aggregate and Mineral Resources)
- **Greenhouse Gas Emissions** (Total GHG Emissions and AB 32 Analysis)
- **Hazardous Materials** (Routine Transport, Upset and Accident Conditions, Contaminated Property, and Schools)
- **Land Use and Agricultural Resources** (Consistency with Plans and Policies, Division of Communities, and Agricultural and Farmlands)
- **Noise** (Construction Noise and Vibration, Land Use Compatibility, and Vibration)
- **Population, Housing and Employment** (Population and Displacement)
- **Public Services and Utilities** (Police, Fire Protection & Emergency Services, Wildfire Hazards, Educational Facilities, Recreational Facilities, Non-Renewable Energy Consumption)
- **Transportation, Traffic and Security** (Vehicle Miles Traveled, Truck Delay)
- **Water Resources** (Water Supply, Wastewater, Riparian Habitats, Groundwater, Water Quality, and Runoff/Drainage)

The MND dismisses the potential for the PSH units analyzed in the MND to contribute to these cumulative impacts, stating that:

PSH development in general would not result in a cumulatively significant contribution to these impacts because:

- PSH development must comply with numerous applicable regulations in the City of Los Angeles (see identified Regulatory Compliance measures throughout this document)
- PSH development would be located in urban areas well-served by infrastructure
- PSH units are generally required to be energy efficient by funding sources
- PSH units have generally very low trip generation

These statements are not sufficient to show that the PSH projects will not result in a contribution to impacts, which is cumulatively considerable. The potential for cumulative impacts remains.

Furthermore, the 2012-2035 Regional Transportation Plan and Sustainable Communities Strategy (2012-2035 RTP/SCS, Plan or Project) analyzed in the PEIR is a “long-range regional transportation plan that provides a blueprint to help achieve a coordinated regional transportation system by creating a vision for transportation investment throughout the region and identifying regional transportation and land use strategies to address mobility needs. The 2012-2035 RTP/SCS includes goals, policies and performance indicators, identifies specific projects, programs and implementation, and includes a description of regional growth trends that identify future needs for travel and goods movement.” It is not a document that analyzes the impacts of PSH development and no housing projects are included on the PEIR Project List (PEIR Appendix B). The City therefore cannot rely on the 2016 PEIR as the cumulative impacts analysis for the PSH Ordinance and gap-funded projects.

2.19 Indirect Impacts - Property Values

The MND should address the fact that there is evidence, that PSH facilities may lead to a decrease in property values when located in higher income areas. According to “The Impacts of Supportive Housing on Neighborhoods and Neighbors”:

101-19

While the *average* relationship between this set of supportive housing facilities and proximate house prices was positive, not all site/neighborhood combinations in Denver experienced the same relationship. When we disaggregated our analysis to measure impacts for different common clusters of sites/neighborhoods, we found that the set of five supportive housing sites located in low-valued, heavily minority-occupied (typically majority Black-occupied) neighborhoods consistently evinced the positive price impacts noted above. By contrast, the site in the highest-value, overwhelmingly white-occupied neighborhood apparently had a *negative* effect on house prices, as did another (poorly maintained) site in a modestly valued, high-density core neighborhood having 24 percent of its population classified as Hispanic.¹⁹

¹⁹ “The Impacts of Supportive Housing on Neighborhoods and Neighbors”, The Urban Institute (October 1999), George Galster et al, page xii:

Our central finding—that supportive housing generally has a positive impact on neighborhoods when done at a small scale, but that poorly managed properties can be deleterious to neighborhoods—implies that public policy would do well to encourage both public education and high-quality operation in the realm of supportive housing. Our findings also strongly suggest that the public sector pay strict attention to the ongoing operation, tenant management, and physical maintenance of supportive housing facilities.²⁰

The environmental document should address the potential environmental consequences of changes in property values and the potential for associated environmental deterioration.

2.20 Growth Inducing Impacts

According to page II-6 of the MND:²¹

According to the Los Angeles Homeless Services Authority (LAHSA) January 2017 Greater Los Angeles Homeless Count there are approximately 34,189 homeless in the City of Los Angeles, of which 25,237 (74%) are unsheltered and 8,952 (26%) are sheltered. (fn6)

Recent research has indicated the potential for the construction of PSH to induce in-migration of additional homeless into a Continuum of Care (CoC) area²² or inhibit out-migration of homeless. As explained by Corinth:

101-20

One potentially important factor that could affect estimates of associations between PSH and homelessness is migration. A CoC that expands its inventory may experience an inflow of homeless people seeking services or a reduced outflow of homeless people to other CoCs.²³

Between 2007 and 2014, communities across the United States rapidly expanded the inventory of PSH beds for homeless individuals with disabling conditions. . . I find that each additional PSH bed was associated with between 0.04 and 0.12 fewer homeless people after one year. Causal effects identified on the basis of lagged funding decisions imply that one additional PSH bed reduces homeless counts by up to 0.10 people. Effect sizes of greater than 0.72 can be rejected at the 95%

²⁰ Ibid, page xiv:

²¹ Footnote 6 in the MND states:

6 Los Angeles Homeless Services Authority, Data and Reports, City of Los Angeles, 2016, [https://documents.lahsa.org/planning/homelesscount/2016/datasummaries/La City. pdf](https://documents.lahsa.org/planning/homelesscount/2016/datasummaries/La%20City.pdf)

²² A Continuum of Care (CoC) is a regional or local planning body that coordinates housing and services funding for homeless families and individuals. There are 414 CoCs in the United States. The Los Angeles CoC covers the Los Angeles County area, but excludes the cities of Glendale, Pasadena and Long Beach.

²³ Corinth, Kevin. “The Impact of Permanent Supportive Housing on Homeless Populations.” *Journal of Housing Economics* 35 (2017) 69-84. Page 75. Available at: https://ac.els-cdn.com/S1051137715300474/1-s2.0-S1051137715300474-main.pdf?_tid=0ccdc104-ba9c-11e7-a99d-00000aacb35f&acdnat=1509056685_fceb158ca8e69a34586fd1d9d46ba052

confidence level, ruling out the simple reasoning that adding one unit of housing reduces homelessness by one person. Relatively modest effects may be explained by some combination of poor targeting, differential exit rates into private housing from PSH relative to homelessness, incentives for remaining homeless, errors in homeless counts, and migration in response to expanded PSH. Indeed, PSH expansion in the rest of a state is associated with significant reductions in homeless counts within a community, consistent with homeless migration in response to PSH expansion.²⁴

The environmental analysis for the proposed Ordinance should therefore address the growth-inducing impacts of the proposed Ordinance.

3. CONCLUSION

The City has not proceeded in the manner prescribe by law regarding the environmental documentation for the PSH Ordinance. The City must therefore take the following actions:

- Void the actions taken by the Planning Commission regarding the PSH Ordinance and the associated environmental documents;
- Prepare an EIR to address the potential impacts of the full range of the City’s efforts to provide housing for homeless persons in the City.
- The EIR should include an analysis of the growth-inducing impacts of the production of housing for homeless persons.
- Comply with CEQA-mandated process requirements.

Thank you in advance for your thoughtful consideration of these issues of concern. I maybe contacted at 310-982-1760 or at jamie.hall@channellawgroup.com if you have any questions, comments or concerns.

Sincerely,



Jamie T. Hall

APPENDICES:

- A Past Channel Law Letters on the PSH Ordinance and MND
- B Minutes From Planning Commission Meeting from December 14, 2017 through February 8, 2018.
- C Notice of Intent to Adopt the MND (dated 1/8/2018)
- D Los Angeles Times Article: A Plan to House L.A.’s Homeless Residents Could Transform Parking Lots Across The City

²⁴ Corinth, Kevin. “The Impact of Permanent Supportive Housing on Homeless Populations.” *Journal of Housing Economics* 35 (2017) 69-84. Page 80.

Appendices – Channel Law Letter

February 12, 2018

Comments On The Environmental Documentation For, And The, Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd (APN 4238-024-900 To 911)

APPENDIX A

The Two Past Channel Law Letters on the PSH Ordinance and MND

Channel Law Group, LLP

8200 Wilshire Blvd.
Suite 300
Beverly Hills, CA 90211

Phone: (310) 347-0050
Fax: (323) 723-3960
www.channellawgroup.com

JULIAN K. QUATTLEBAUM, III *
JAMIE T. HALL **
CHARLES J. McLURKIN

Writer's Direct Line: (310) 982-1760
jamie.hall@channellawgroup.com

*ALSO Admitted in Colorado
**ALSO Admitted in Texas

December 20, 2017

VIA ELECTRONIC MAIL

Los Angeles Planning Commission
Department of City Planning,
City Hall - Room 763,
200 North Spring Street,
Los Angeles CA 90012

Via email: darlene.navarrete@lacity.org
and: cally.hardy@lacity.org

**Re: Comments On The Environmental Documentation For, And The,
Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-
3137) And Proposed Redevelopment Of Venice Dell Pacific Site Located At
125 E. Venice Blvd (APN 4238-024-900 To 911)**

Dear Planning Commissioners:

This firm represents Venice Vision with regard to the proposed development at 125 E. Venice Boulevard as well as the Permanent Supportive Housing Ordinance proposed by the City of Los Angeles (City). The City released the Permanent Supportive Housing (PSH) Ordinance for a 60-day comment period beginning on August 31, 2017 and ending on October 30, 2017. On October 30, 2017 Channel Law provided the City with comments on the Permanent Supportive Housing (PSH) Ordinance, including comments on:

- The lack of availability of a California Environmental Quality Act (CEQA) document during the public review period for the PSH Ordinance;
- The inaccurate project description provided as part of the answers to the Frequently Asked Questions attached to the Notice requesting comments on the PSH Ordinance;
- The failure of the PSH Ordinance Notice to disclose the creation of a new CEQA exemption;
- The inadequate project description resulting from failure to describe the number and location of PSH developments;
- The inadequate requirement for the provision of supportive services, and its potential to result in environmental consequences; and,

- The need to address the potential for growth-inducing impacts, cumulative impacts, and increased water demand.

Channel Law’s comment letter is incorporated herein by reference and included as **Attachment 1** to this letter. Channel Law asked a number of questions regarding the PSH Ordinance and also made the following suggestions regarding ways to amend the PSH Ordinance in that letter, including:

- Remove the new CEQA exemption for PSH projects; instead the existing CEQA low-income housing exemption should be applied.
- Include language in the Ordinance to make clear that pursuant to CEQA Guidelines Section 15268(d) where a PSH project involves an approval that contains elements of both a ministerial action and a discretionary action, the project will be deemed to be discretionary and will be subject to the requirements of CEQA.
- Allow for automatic rezoning of only those parcels addressed in the environmental document for the proposed Ordinance, or specifically addressed in the environmental document for the applicable area plan.
- Add requirements for provision of an appropriate level of supportive services to be maintained over the life of individual PSH projects.

Channel Law has not received responses to our questions or comments. Channel Law’s comment letter was not included in the December 14, 2017 Staff Report and agenda packet for the Planning Commission. Furthermore, Channel Law’s comments and suggestions have been largely ignored, and have not been adequately addressed in the December 14, 2017 Staff Report, including the following Exhibits to the Staff Report:

- A - Proposed Permanent Supportive Housing Ordinance
- B - Environmental Clearance
 - B.1 Mitigated Negative Declaration
 - B.2 Addendum to the SCAG 2016-2040 RTP/SCS PEIR, SCH No. 2015031035
- C - Affordable Housing Opportunity Sites

On November 30, 2017 the City released the Mitigated Negative Declaration (MND) for the project, for public review and comment. The City has not circulated the “Addendum” to the SCAG 2016-2040 RTP/SCS PEIR or noticed the availability of the Addendum.

This comment letter provides comments on both the City’s flawed process and problems with the environmental documents for the PSH Ordinance. We would request responses to both the comments contained in this letter, and our October 30, 2017 letter.

1. THE CITY’S PROCESS FOR REVIEWING AND APPROVING THE PERMANENT SUPPORTIVE HOUSING ORDINANCE IS FATALLY FLAWED

The City has engaged in a confusing and fatally flawed process regarding the adoption of the Permanent Supportive Housing Ordinance (PSH Ordinance).

1.1 The City Conducted Public Hearings and Ended The Comment Period On The Ordinance Prior to Release of the Environmental Document

The City released the PSH Ordinance for a 60-day comment period beginning on August 31, 2017 and ending on October 30, 2017. During the 60-day comment period, staff held two public hearings on the PSH Ordinance, on: September 25, 2017 and September 28, 2017. The comment period thus ended a month before the City's November 30, 2017 release of the MND for the project.

The failure to provide the public with the MND for the PSH Ordinance until one month after the close of the public comment period on the PSH Ordinance has inappropriately limited public comment on the PSH Ordinance, in violation of Public Resources Code (PRC) Section (§) 21003.1 and CEQA Guidelines §15004 which states:

(b) Choosing the precise time for CEQA compliance involves a balancing of competing factors. EIRs and negative declarations should be prepared as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment.

...

(c) The environmental document preparation and review should be coordinated in a timely fashion with the existing planning, review, and project approval processes being used by each public agency. These procedures, to the maximum extent feasible, are to run concurrently, not consecutively. When the lead agency is a state agency, the environmental document shall be included as part of the regular project report if such a report is used in its existing review and budgetary process.

Channel Law commented in our October 30, 2017 letter on the fact that failure to provide the public with a copy of the CEQA document during the public review period inhibited the ability of the public to comment on, or fully understand, the potential impacts of the proposed PSH Ordinance. In addition, requiring the public to separately comment on the PSH Ordinance and then subsequently on the MND for the project, unduly burdens the public, since as noted in the Channel Law letter, a full description of the components and sites affected by the PSH Ordinance was not made available to the public during the comment period on the Ordinance.

According to the Staff Report for the December 14, 2017 Planning Commission hearing on the PSH Ordinance, the City has made the following changes to the August 30, 2017 version of the PSH Ordinance:

- References were added to State Density Bonus law to make clear that the ordinance is intended to create permanent supportive housing units consistent with state density bonus provisions. This revision ensures that the grant of any bonuses, incentives, or concessions under this ordinance shall not be considered an increase in density or other change which requires any corresponding zone change, general plan amendment, specific plan

exception, or discretionary action. This does not supersede or in any way alter or lessen the effect or application of the Coastal Act.

- To ensure general plan land use consistency, the amendment to the PF Zone was revised to allow the application of the least restrictive adjacent zone, in lieu of the least restrictive zone within 1/4-mile radius of the project site.
- To more closely align with other incentives, a modification was made to allow for up to 20% relief in any other development standard not already specified, in lieu of 35% relief.
- The construction standards were revised to be more consistent with Mitigation Measures included in the Mitigated Negative Declaration prepared for the ordinance.
- The definition of a Qualified PSH Project was amended to reflect recent changes to definitions for project funding requirements under Measure HHH and ensure that these requirements are in alignment.
- The setback incentive was revised to respect prevailing front yards in residential zones.
- To further ensure high quality, pedestrian-scale design, additional design standards were added related to screening of parking structures.

The modified PSH Ordinance was not made available to the public concurrent with the release on the MND for the PSH Ordinance. In addition, it is unclear whether the MND analyzes the August 17, 2017 or current version of the PSH Ordinance. Which version is analyzed in the MND?

1.2 The Planning Commission Took Action on the Project Prior to The Close of the MND Comment Period

The PSH Ordinance was considered by the Planning Commission on December 14, 2017, prior to the close of the 20-day comment period on the MND on December 20, 2017. At the Planning Commission hearing, recommended actions included (See **Attachment 2** – Audio Links Item 12):¹

- | | |
|-----------------------------|---|
| RECOMMENDED

ACTIONS: | <ol style="list-style-type: none">1. Recommend adoption of the proposed ordinance (Exhibit A);2. Adopt the staff report as the Commission report on the subject;3. Adopt the attached Findings;4. Recommend that the City Council FIND that pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including Mitigated Negative Declaration No. ENV-2017-3137-MND ("Mitigated Negative Declaration-) (Exhibit B.1), and all comments received, with imposition of mitigation measures, there is no substantial evidence that the project will have a Significant effect on the |
|-----------------------------|---|

¹Item CPC-2017-3409-CA <https://planning.lacity.org/InternetCalendar/pdf.aspx?Id=59215>
See Attachment 2 – Item 12 with a link to the Audio of hearing:
<https://planning.lacity.org/InternetCalendar/pdf.aspx?Id=59322>
<http://planning.lacity.org/StaffRpt/Audios/CPC/2017/12-14-2017/13%20CPC-2017-3409.mp3>

environment; FIND the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; FIND the mitigation measures have been made conditions on the project; and ADOPT the Mitigated Negative Declaration; and

5. **Recommend** that the City Council FIND, based on their independent judgment, after consideration of the whole of the administrative record, including the SCAG 2016-2040 RTP/SCS PEIR, SCH No. 2015031035, certified on April 7, 2016 (EIR) and the Addendum prepared for the Permanent Supportive Housing Ordinance (Addendum) (Exhibit B.2), the project was assessed in the EIR and pursuant to the CEQA Guidelines, Sections 15162 and 15164 and the Addendum that no major revisions to the EIR are required and no subsequent EIR or negative declaration is required for approval of the project.

The Planning Commission took the actions recommended by Staff. As noted in the Letter of Determination dated December 19, 2017 for the PSH Ordinance included as **Attachment 2**, the Planning Commissions actions included the following finding (emphasis added):

1. Found pursuant to CEQA Guidelines Section 1507 4(b), after consideration of the whole of the administrative record, including Mitigated Negative Declaration No. ENV-2017- 3137-MND (Mitigated Negative Declaration), **and all comments received**, with imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; Found that the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; Found the mitigation measures have been made enforceable conditions on the project; and adopt the Mitigated Negative Declaration; and Adopted the Mitigated Negative Declaration and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;
- ...
4. Approved and recommended that the City Council adopt the proposed ordinance, as amended by the Commission, subject to review by the City Attorney as to form and legality; and
5. Adopted and recommended that the City Council adopt the attached Findings.

The Planning Commission's findings contain an untruth. The Planning commission could not have considered comments on the MND before approving the ordinance, since the Planning Commission acted before completion of the public comment period on the MND. This is a violation of CEQA Guidelines § 15004(b), which states:

- (2) To implement the above principles, public agencies shall not undertake actions concerning the proposed public project that would have a significant adverse effect or limit the choice of alternatives or mitigation measures, before completion of CEQA compliance. For example, agencies shall not:

- (A) Formally make a decision to proceed with the use of a site for facilities which would require CEQA review, regardless of whether the agency has made any final purchase of the site for these facilities, except that agencies may designate a preferred site for CEQA review and may enter into land acquisition agreements when the agency has conditioned the agency's future use of the site on CEQA compliance.
- (B) Otherwise take any action which gives impetus to a planned or foreseeable project in a manner that forecloses alternatives or mitigation measures that would ordinarily be part of CEQA review of that public project.

1.3 The City Circulated The Mitigated Negative Declaration For 21-Days, Rather Than The 30-Days Required For A Project Of Area-Wide Significance

The MND for the PSH Ordinance was release for public review and comment on November 30, 2017 for a 21-day period ending December 20, 2017. As noted on page II-1 of the MND: "The Proposed Ordinance would apply citywide." The MND is for a project of area-wide significance, as defined in CEQA Guidelines §15206(b)(2).² Therefore, pursuant to CEQA the MND should have been circulated for 30-day public review and comment.

As shown in MND Figure 4, included in **Attachment 4**, PSH-eligible parcels are located throughout the City and in close proximity to other jurisdictions. The proposed project has the potential to result in impacts that extend beyond the City in which the project is located.

Recent research has indicated the potential for the construction of PSH to induce in-migration of additional homeless into a Continuum of Care (CoC) area or inhibit out-migration of homeless.³ A Continuum of Care (CoC) is a regional or local planning body that coordinates housing and services funding for homeless families and individuals. There are 414 CoCs in the United States. The Los Angeles CoC covers the Los Angeles County area, but excludes the cities of Glendale, Pasadena and Long Beach. There are 88 incorporated cities in Los Angeles County. The PSH Ordinance thus has the potential to impact 85 of the cities and the County of Los Angeles, which are part of the Los Angeles CoC.

The proposed project is of area-wide significance as defined in CEQA Guidelines §15206(b)(2) since it will result in the construction of more than 500 dwelling units. As noted on page II-4 of the MND: "The City's Comprehensive Homeless Strategy identified a need to build at least 1,000 PSH units per year, an increase of up to 700 units from its current average production rate of approximately 300 units per year. As noted on page II-5 of the MND:

² In addition, several of the round-one parcels are located within the Coastal Zone, as shown on MND Figure 5. **Attachment 3** contains the City of Los Angeles Parcel Profile Report for the parcels located at 125 E Venice Boulevard (The Venice Dell Pacific Site, incorrectly listed as 200 E Venice Boulevard in the MND and Exhibit C to the Staff Report) and Thatcher Yard parcel at 3238 Thatcher Avenue, showing that these two parcels are located in the Coastal Zone. Therefore any EIR required for the project would need to be circulated to the State Clearinghouse pursuant to CEQA 15206(b)(4)(C).

³ Corinth, Kevin. "The Impact of Permanent Supportive Housing on Homeless Populations." Journal of Housing Economics 35 (2017) 69-84. Page 75. Available at: https://ac.els-cdn.com/S1051137715300474/1-s2.0-S1051137715300474-main.pdf?_tid=0cedc104-ba9c-11e7-a99d-00000aacb35f&acdnat=1509056685_fceb158ca8e69a34586fd1d9d46ba052

Based on this study, and due to the fact that the construction of PSH is constrained by the availability of public funding, it is reasonably foreseeable that the Proposed PSH Ordinance could, with the most generous assumptions (and conservative for purposes of environmental review), result in the construction of an additional 200 units per year of PSH in addition to the 1,000 units per year anticipated to result from Measure HHH and other previously approved gap-funding projects. Therefore, for purposes of the City's analysis of the PSH Ordinance in this MND, the City is analyzing the impacts of construction and operation of 2,000 units constructed over a 10-year period (200 units/year). Construction of the other 10,000 or 1,000 units a year for the next 10 years is part of the cumulative development allowed by the previously approved gap funding projects, identified above.

The public and affected and responsible agencies have been provided with inadequate time to review and comment on the MND for the PSH Ordinance. The PSH Ordinance should have been circulated for a 30-day comment period.

1.4 Violation of CEQA Guidelines § 15072(b) - The City Failed To Provide The Notice As Required By CEQA To Channel Law

In Channel Law's October 30, 2017 letter on the PSH Ordinance on page 2, Channel Law requested that the City:

Please contact us and provide information on the timeline for CEQA compliance and the type of CEQA document to be prepared. Indicate how participation in the CEQA process will be coordinated with the Ordinance review and consideration process. Please provide any notices or other information regarding this Ordinance to us at the address listed on our letterhead.

Although Jamie Hall of our office did receive email notice, on December 7, 2017⁴ (at 5:36 PM) from Cally Hardy - Los Angeles City Planning Assistant, regarding the fact that: "The Permanent Supportive Housing Ordinance (CPC-2017-3136-CA) has been scheduled for next Thursday's (12/14) meeting of the City Planning Commission," Channel Law received no notice regarding the availability of the MND or Addendum for the project, despite having commented on the need for CEQA compliance prior to approval of the PSH Ordinance, and having requested provision of notices or other information regarding this matter. CEQA Guideline § 15072 requires in part that:

- (b) The lead agency shall mail a notice of intent to adopt a negative declaration or mitigated negative declaration to the last known name and address of all organizations and individuals who have previously requested such notice in writing . . .

⁴ On November 30, 2017 the City released the Mitigated Negative Declaration (MND) for the project, for public review and comment. Notice of the Planning Commission hearing and how to access the Staff Report for the hearing was not received until December 7, seven days after the start of the comment period on the MND.

The City thus failed to proceed in the manner proscribed by law, and inhibited Channel Law's ability to participate in the CEQA process by failing to provide notice of the availability of the CEQA documents.

1.4. The City's Notice of Intent to Adopt the MND Fails to Comply with the Noticing Requirements of CEQA Guidelines Section 15070(g)

The environmental notice for the MND (Mitigated Negative Declaration-NG-17-140-PL: ENV-2017-3137) is included as **Attachment 5**. It states:

MITIGATED NEGATIVE DECLARATION-NG-17-140-PL: ENV-2017 3137. Citywide zoning ordinance affecting all parcels in the City of Los Angeles zoned for multifamily residential use & located within High Quality Transit Areas (HQTAs). Additionally, PSH development could occur on some parcels zoned Public Facilities (PF), and on some sites which are currently protected under the City's Residential Hotel Unit Conversion & Demolition Ordinance in LAMC Section 47.70 et seq. CD's 1-15. The Proposed Permanent Supportive Housing (PSH) Project is an ordinance (PSH Ordinance) that would amend the City of Los Angeles Municipal Code (LAMC) to facilitate development of PSH units. The purpose of this ordinance is to improve the process for the development of these units. The Proposed PSH Project would amend Sections 12.03, 12.04.09, 14.00 & 16.05 of the LAMC establishing regulations that define PSH & project eligibility criteria, establish unique development standards for PSH, and facilitate administrative review & approval, as well as modify certain provisions related to height & density, consistent with State Density Bonus Law. The PSH Ordinance would allow for projects to select up to four concessions with respect to Zoning Code, including up to 20% decrease in required setbacks, up to 20% reduction in required open space, up to 20% increase in lot coverage limits, up to 35% increase in FAR and depending on the height district up to a 35% increase in height or one additional story. Additional design requirements include that when adjacent to or across an alley from an R2 or more restrictive zone, the building's transitional height shall be stepped-back within a 45-degree angle. REVIEW/COMMENT period ends: Dec. 20, 2017.

The notice fails to include the following information required by CEQA Guidelines § 15070(g):

- (g) A notice of intent to adopt a negative declaration or mitigated negative declaration shall specify the following:
 - (2) The starting and ending dates for the review period during which the lead agency will receive comments on the proposed negative declaration or mitigated negative declaration. This shall include starting and ending dates for the review period. If the review period has been shortened pursuant to Section 15105, the notice shall include a statement to that effect.
 - (3) The date, time, and place of any scheduled public meetings or hearings to be held by the lead agency on the proposed project, when known to the lead agency at the time of notice.
 - (5) The presence of the site on any of the lists enumerated under Section 65962.5 of the Government Code including, but not limited to lists of

hazardous waste facilities, land designated as hazardous waste property, and hazardous waste disposal sites, and the information in the Hazardous Waste and Substances Statement required under subdivision (f) of that section.

The Notice fails to include several required items. Although the notice is dated November 30, 2017, it fails to specially state the starting and ending dates for public review per CEQA Guidelines § 15070(g)(2). Although a Planning Commission hearing was held on December 14, 2017 and separately noticed on December 7, 2017, the environmental notice published on the City's website and in the Los Angeles Times fails to list the date, time and place of this known public meeting per CEQA Guidelines § 15070(g)(3). Although the MND identifies the potential for PSH sites to be included on a list of hazardous materials sites complied pursuant to Government Code Section 65962.5, and includes a mitigation measure to address this,⁵ the environmental notice published by the City fails to identify this, per CEQA Guidelines § 15070(g)(5).

1.5 The City Inappropriately Relies In-Part On An Addendum Prepared By The City to An EIR Prepared By Another Agency

In an effort to provide cover for the City's failure to both prepare an adequate MND for the project and to comply with MND process requirements specified in CEQA, the Planning Commission was also presented with a second, separate environment document for the PSH Ordinance: a City-prepared Addendum to the Program Environmental Impacts Report (PEIR) for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by the Southern California Association of Governments (SCAG).⁶ This was included as a separate environmental document for the PSH Ordinance. This was no doubt done in order to further frustrate the ability of the public to review and comment on the environmental document for the project, since an Addendum need not be circulated for public review.

According to the Letter of Determination included in **Attachment 2**, Planning Commission then took the following action at its December 14, 2017 meeting:

At its meeting of December 14, 2017, the Los Angeles City Planning Commission took the actions below in conjunction with the approval of the proposed ordinance: . . .

2. Approve and recommend that the City Council find, based on their independent judgement, after consideration of the whole of the administrative record, including the SCAG 2016-2040 RTP/ SCS PEIR (SCH No. 2015031035), certified on April 7, 2016 (EIR) and the Addendum prepared for the PSH Ordinance (Addendum), the project was assessed in the EIR and pursuant to the CEQA Guidelines, Sections 15162 and 15164 and the

⁵ MND pages III-5 and IV-37 to IV-39.

⁶ A copy of the PEIR is available at: <http://scagrtpscscs.net/Pages/DRAFT2016PEIR.aspx>

Copies of the SCAG's two Addendums are available at:

<http://scagrtpscscs.net/Pages/FINAL2016PEIR.aspx>

<http://scagrtpscscs.net/Pages/2016RTPSCSAmendments.aspx>

Addendum that no major revisions to the EIR are required and no subsequent EIR, or negative declaration is required for approval of the project;

Use Of Both An MND and Addendum For The Same Project Is Inappropriate

Nowhere in CEQA is it contemplated that a Lead Agency would prepare two concurrent and separate environmental documents for a project. Doing so is particularly egregious when the public has been afforded inadequate time to review one of the documents and no time to review the other. In fact, preparation of the Addendum is contrary to a number of CEQA precepts, including:

- PRC § 21003, which states in part: “(f) All persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical, and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment.”
- Guidelines §15002(a), which states: Basic Purposes of CEQA. The basic purposes of CEQA are to: (1) Inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities.
- Guidelines §15002 (j), which states: Public Involvement. Under CEQA, an agency must solicit and respond to comments from the public and other agencies concerned with the project. (See: Sections 15073, 15086, 15087, and 15088.)

Addendum Process Failed To Comply With CEQA

Not only is the use of an Addendum inappropriate in this case for a number of reasons, the City has failed to comply with the procedural requirements for an Addendum. The requirements for use of an Addendum are specified in CEQA Guidelines §15164

15164. ADDENDUM TO AN EIR OR NEGATIVE DECLARATION

- (a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- (c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- (d) The decision making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
- (e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency’s findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

The Addendum prepared by the City does not specify the changes or additions that are necessary SCAG’s RTP/SCS PEIR to address the PSH Ordinance. As required by Guidelines §15164(c) the final PEIR was not provided along with the Addendum to the Planning Commission. As required by Guidelines §15164(d) the Planning Commission did not consider the Addendum with the final prior to making a decision on the project.

The City's preparation of an Addendum is clearly an attempt to circumvent criticism of inadequate provisions for public review of the MND for the PSH Ordinance. This is ironic, given, as shown in **Attachment 6**, the Southern California Association of Governments (SCAG) sent both the PEIR and the SCAG's Addendums to the RTP/SCS PEIR to the State Clearinghouse.⁷ The City has sent neither the MND nor the Addendum to the State Clearinghouse. SCAG not only circulated the Draft EIR for the RTP/SCS for public comment from 12/4/2015 to 2/1/2016, SCAG also circulated its Addendum to the RTP/SCS PEIR for public review and comment from 7/10/2017 to 8/24/2017 (see **Attachment 6**). The City has provided no opportunity for public review and comment on its "Addendum" to the RTP/SCS EIR, nor has it provided the Lead Agency for the PEIR, SCAG, with the opportunity to comment on the Addendum to the RTP/SCS PEIR.

Violation of CEQA Guidelines §15153

Given that the City's Addendum provides no information on the modifications to the RTP/SCD PEIR that are necessary to make the document adequate as the environmental document for the PSH Ordinance, the City is essentially making use of an EIR from an earlier project, the 2016-2040 RTP/SCS. While it is questionable whether a Lead Agency may make use of another agency's EIR for their own project, if the City were to do so, it would need to comply with the requirements of Guidelines §15153, which state in part:

15153. USE OF AN EIR FROM AN EARLIER PROJECT

- (a) The Lead Agency may employ a single EIR to describe more than one project, if such projects are essentially the same in terms of environmental impact. Further, the Lead Agency may use an earlier EIR prepared in connection with an earlier project to apply to a later project, if the circumstances of the projects are essentially the same.
- (b) When a Lead Agency proposes to use an EIR from an earlier project as the EIR for a separate, later project, the Lead Agency shall use the following procedures:
 - (1) The Lead Agency shall review the proposed project with an Initial Study, using incorporation by reference if necessary, to determine whether the EIR would adequately describe:
 - (A) The general environmental setting of the project,
 - (B) The significant environmental impacts of the project, and
 - (C) Alternatives and mitigation measures related to each significant effect.
 - (2) If the Lead Agency believes that the EIR would meet the requirements of subdivision (1), it shall provide public review as provided in Section 15087 stating that it plans to use the previously prepared EIR as the draft EIR for this project. . .
 - (3) The Lead Agency shall prepare responses to comments received during the review period.

Use of an EIR from an earlier project thusly does not absolve the City from the need to provide the public with the opportunity to review and comment on the EIR being used.

⁷ SCH # 2015031035.

The City Should Have Tiered Off the RTP/SCS PEIR Rather Than Prepared an Addendum to the RTP/SCS PEIR

Rather than prepare an Addendum to a Program EIR that was not prepared by the City, CEQA would dictate that the City prepare one environmental document for the PSH Ordinance and tier that environmental document off the RTP/SCS PEIR, if appropriate. This is in fact what SCAG envisioned cities would do, when it prepared the RTP/SCS PEIR. As explained by SCAG on page 1 of Addendum # 2 to the RTP/SCS PEIR:

Pursuant to Section 15152 of the CEQA Guidelines, subsequent environmental analyses for separate, but related, future projects may tier off the analysis contained in the 2016 RTP/SCS PEIR.

This is in fact noted in the City's Addendum, for the PSH Ordinance, which states on pages 1-2, that SCAG envisioned the 2016 RTP/SCS PEIR be used for tiering:

The 2016 RTP/SCS PEIR was drafted as a first tier document that would support local agencies in the SCAG region in considering subsequent projects. As stated in the 2016 RTP/SCS PEIR:

This PEIR provides a first-tier, programmatic environmental analysis, for a long range, regional scale plan document that will support local agencies in the evaluation of subsequent projects, and facilitate avoidance, reduction, and minimization of direct and indirect impacts, growth-inducing impacts, and cumulative environmental impacts with respect to local projects. The project proponent seeking to construct and operate individual properties will need to identify the public agency who will have the primary discretionary land use decision with respect to second tier projects. Consistent with the provisions of Section 15050(a) of the State CEQA Guidelines, the determination of the appropriate second-tier level of environmental review will be determined by the lead agency with primary discretion and decision-making authority for subsequent projects being considered for approval that is subject to CEQA. (RTP/SCS PEIR at 1-2.)

The tiering process is described in PRC §21094 and CEQA Guidelines §15152. As required by PRC §21094(c):

- (c) For purposes of compliance with this section, an initial study shall be prepared to assist the lead agency in making the determinations required by this section. The initial study shall analyze whether the later project may cause significant effects on the environment that were not examined in the prior environmental impact report.

As explained in CEQA Guidelines §15152(f), depending on the outcome of the Initial Study, the Lead Agency may then prepare either a EIR or negative declaration. There is no provision in CEQA or Guidelines §15152 for preparing an addendum when tiering:

- (f) A later EIR shall be required when the initial study or other analysis finds that the later project may cause significant effects on the environment that were not adequately addressed in the prior EIR. A negative declaration shall be required when the provisions of Section 15070 are met.

The City has inappropriately prepared an Addendum for the PSH Ordinance. The Addendum can not and does not excuse the flaws in the MND process for the PSH Ordinance.

2. COMMENTS ON THE STAFF REPORT FOR THE PSH ORDINANCE

2.1 Staff Report and MND Provide Unclear and Conflicting Information Regarding Application of the PSH Ordinance to the Venice Dell Pacific Site and the Thatcher Yard Site

City's Staff Report provide the following unclear and conflicting information regarding the applicability of the PSH Ordinance to the Venice Dell Pacific and Thatcher Yard Sites, stating:

Applicability of PSH Ordinance to Specific Sites

Staff have received numerous comments from members of the public pertaining to specific project sites (see "*Public Communications*"). The proposed ordinance was not drafted with any particular sites in mind, but rather to amend citywide land use regulations governing the development of PSH. In particular, two City-owned properties that are part of the AHOS Initiative led by the Office of the CAO were the subject of many comments received: the Venice Dell Pacific site and the Thatcher Yard site, both in the Venice Community Plan area. The CAO has selected a developer to submit a proposal for each of these sites; however, no proposal has been finalized at this time. It is not clear the extent to which the proposed ordinance may apply to any projects proposed for those sites, or whether the proposed projects would qualify for the provisions of the ordinance.

The Venice Dell Pacific site (125 E. Venice Blvd.) is zoned for Open Space (OS), and therefore would not be eligible for the proposed ordinance as residential uses are not an allowed use in the OS Zone.

The Thatcher Yard site (3233 S. Thatcher Ave.) is zoned for Public Facilities (PF), and is adjacent to an R1 and C4 Zone. The proposed amendments to the PF Zone could facilitate the application of the uses and standards of the adjacent C4 Zone to this site, only if the proposal were for a Qualified PSH project as defined in the ordinance. However, the site is within the Coastal Zone and the Oxford Triangle Specific Plan area and thus would be subject to discretionary review in accordance with these requirements and appropriate environmental clearance.

However, Exhibit C to the Staff Report, the MND and the Addendum identify both of these properties as Round-One Properties. Exhibit C and similar pages in the environmental documents indicate that the City has an Exclusive Negotiating Agreement (ENA) with Hollywood Community Housing Corporation and Venice Community Housing for the Venice

Dell Pacific Site, despite the fact that it is zoned Open Space. Is the City planning to re-zone the site? Exhibit C indicates that the City has an Exclusive Negotiating Agreement (ENA) with Thomas Safran and Associates for the Thatcher Yard Site. What environmental documents were prepared prior to entering into the ENAs for these two sites? As noted in our October 30, 2017 comment letter, Section 16.05 B.2 of the City's Municipal Code specifies that any project requiring a coastal development permit is discretionary, thus triggering CEQA. As shown in **Attachment 3**, both of these sites are located in the Coastal Zone. Pursuant to Public Resources Code § 21003.1 and CEQA Guidelines §15004 environmental review should have been conducted prior to executing the ENAs. What environmental document will be prepared prior to approving any project on these two sites? The MND should identify those site that will be subject to further environmental review, the nature of that review and whether the environmental documents will be circulated to the public for review and comment.

3. COMMENTS ON THE ENVIRONMENTAL DOCUMENTS FOR THE PSH ORDINANCE

As previously noted in this comment letter, Channel Law and members of the public have been provided with insufficient time to review and comment on the environmental documents for the PSH Ordinance. Given the time constrains, we off these preliminary comments on the defects in the environmental documents.

3.1 Inadequate Project Description – Failure to Identify All Potential PSH City Owned Land

The MND needs to explain which Round One Properties (MND Table 5, MND pages 38-39) will be subject to separate environmental review, which are addressed in the MND, and which are considered exempt from environmental review with and without the PSH Ordinance. (See also comments in Section 2.1 above.) The MND needs to identify the development potential of the Round One Properties. The environmental document for the project needs to provide site-specific analysis for known project sites.

In terms of City-owned property and sites in the Public Facilities Zone (PF), the environmental documents identify only the seven Round One Properties, and indicates that: The CAO intends to continue to identify suitable City owned properties on an annual basis, which will the be included in Request for Proposals to the City's qualified list of developers."⁸ The MND can not be used as the environmental clearance for PSH projects unless they are more specifically identified in the MND; Figure 4 is insufficient.

The project description in the MND fails to disclose that the Ordinance creates a new CEQA exemption for PSH projects in two sections of the Ordinance, and that this new exemption is inconsistent with Public Resources Code (CEQA) Section 21159.21 and does not require compliance with Public Resources Code (PRC) Section 21159.23. PRC Section 21159.21 provides the criteria for qualifying for housing project exemptions⁹ and PRC Section 21159.23 provides for an exemption for low-income housing for residential housing consisting of 100 or fewer units.¹⁰ Pursuant to CEQA a low-income housing project would not qualify for an

⁸ Addendum, page 39.

⁹ See also CEQA Guidelines Section 15192.

¹⁰ See also CEQA Guidelines Section 15194.

exemption “if there is a reasonable possibility that the project would have a significant effect on the environment or the residents of the project due to unusual circumstances or due to the related or cumulative impacts of reasonably foreseeable projects in the vicinity of the project.”¹¹ Pursuant to PRC Section 21159.21, a low income housing project would not qualify for an exemption if it is inconsistent with any applicable general plan, specific plan or local coastal program; community-level environmental review has not been adopted or certified; existing utilities are not adequate to serve the project; the site is on a list of hazardous materials sites; the project would impact historical resources; or is in a hazards area.

In contrast, the Ordinance provides for an exemption for PSH projects, by adding the following language to Article 6.1 – Review of Development Projects, Section 16.05D – Exemptions,¹² via Section 4 of the Ordinance:

Section 4. Subdivision 8 of Subsection D of Section 16.05 of the Los Angeles Municipal Code is added to read as follows:

8. A Qualified Permanent Supportive Housing Project developed pursuant to Section 14.00 A.11 of this Code and containing no more than 120 units, or no more than 200 units if it is located in the Greater Downtown Housing Incentive Area.¹³

The Ordinance thus allows for exemption of PSH projects with a larger number of units than would be allowed under existing CEQA exemptions. This change to existing CEQA exemptions, to create a less restrictive exemption for PSH projects is a discretionary action subject to CEQA review, should be disclosed in the MND and analyzed in the environmental document for the PSH Ordinance.

3.2 Project Impacts

We offer the following limited comments on the discussion of potential project impacts, given the inadequate time provided for review and comment on the environmental documents for the PSH Ordinance.

Impact on Crime

In addressing whether it is appropriate to increase the size of the low-income housing (i.e. PSH) projects eligible for an exemption, the environmental document for the Ordinance should address the fact that the Minnesota Housing Finance Agency’s Research and Evaluation Unit in their review of housing studies found:¹⁴

¹¹ CEQA (Public Resources Code) 21159.23(c).

¹² Section 16.05D states: “Unless made discretionary by any other provision of law, the approval of any building permit for a development project which does not exceed the thresholds set forth in this subsection and Section 12.24U14 is ministerial and exempt from the requirements of the California Environmental Quality Act.

¹³ Page 9, Draft Ordinance 8/30/2017.

¹⁴ Discussion Paper, Impact of Affordable Housing on Communities and Households, Minnesota Housing Finance Agency, page 4.

Impact on Neighborhood Crime

Research on the relationship between affordable housing and crime identifies project scale as the most important factor in determining the impact on neighborhood crime rates. Multiple studies find that smaller projects (typically less than 50 units) have no impact on neighborhood crime, but that larger projects may result in increased crime. This finding was common across multiple types of affordable housing, including non-profit rental housing, public housing, and supportive housing.

Impact on Property Values

The MND should address the fact that there is evidence, that PSH facilities may lead to a decrease in property values when located in higher income areas. According to “The Impacts of Supportive Housing on Neighborhoods and Neighbors:

While the *average* relationship between this set of supportive housing facilities and proximate house prices was positive, not all site/neighborhood combinations in Denver experienced the same relationship. When we disaggregated our analysis to measure impacts for different common clusters of sites/neighborhoods, we found that the set of five supportive housing sites located in low-valued, heavily minority-occupied (typically majority Black-occupied) neighborhoods consistently evinced the positive price impacts noted above. By contrast, the site in the highest-value, overwhelmingly white-occupied neighborhood apparently had a *negative* effect on house prices, as did another (poorly maintained) site in a modestly valued, high-density core neighborhood having 24 percent of its population classified as Hispanic.¹⁵

...

Our central finding—that supportive housing generally has a positive impact on neighborhoods when done at a small scale, but that poorly managed properties can be deleterious to neighborhoods—implies that public policy would do well to encourage both public education and high-quality operation in the realm of supportive housing. Our findings also strongly suggest that the public sector pay strict attention to the ongoing operation, tenant management, and physical maintenance of supportive housing facilities.¹⁶

The environmental document should address the potential environmental consequences of changes in property values.

Increase in Water Demand

CEQA Guidelines Section 15155 requires the City to consult with the applicable water agency for any water-demand project, including residential development of more than 500 units,

¹⁵ “The Impacts of Supportive Housing on Neighborhoods and Neighbors”, The Urban Institute (October 1999), George Galster et al, page xii:

¹⁶ Ibid, page xiv:

as part of the preparation of the environmental document for the project (in this case the Ordinance). Given that the intent of the Ordinance is to increase the production of PSH, with a goal of at least an additional 2000 units over 10 years, as part of the preparation of the environmental document for the Ordinance, the City should have consulted with the applicable water agency to determine if the intended effects of the Ordinance were included in the most recently adopted urban water management plan and to prepare a water assessment approved at a regular or special meeting of that governing body.

Growth Inducing Impacts

Recent research has indicated the potential for the construction of PSH to induce in-migration of additional homeless into a Continuum of Care (CoC) area¹⁷ or inhibit out-migration of homeless. As explained by Corinth:

One potentially important factor that could affect estimates of associations between PSH and homelessness is migration. A CoC that expands its inventory may experience an inflow of homeless people seeking services or a reduced outflow of homeless people to other CoCs.¹⁸

Between 2007 and 2014, communities across the United States rapidly expanded the inventory of PSH beds for homeless individuals with disabling conditions. . . I find that each additional PSH bed was associated with between 0.04 and 0.12 fewer homeless people after one year. Causal effects identified on the basis of lagged funding decisions imply that one additional PSH bed reduces homeless counts by up to 0.10 people. Effect sizes of greater than 0.72 can be rejected at the 95% confidence level, ruling out the simple reasoning that adding one unit of housing reduces homelessness by one person. Relatively modest effects may be explained by some combination of poor targeting, differential exit rates into private housing from PSH relative to homelessness, incentives for remaining homeless, errors in homeless counts, and migration in response to expanded PSH. Indeed, PSH expansion in the rest of a state is associated with significant reductions in homeless counts within a community, consistent with homeless migration in response to PSH expansion.¹⁹

The environmental analysis for the proposed Ordinance should therefore address the growth-inducing impacts of the proposed Ordinance.

¹⁷ A Continuum of Care (CoC) is a regional or local planning body that coordinates housing and services funding for homeless families and individuals. There are 414 CoCs in the United States. The Los Angeles CoC covers the Los Angeles County area, but excludes the cities of Glendale, Pasadena and Long Beach.

¹⁸ Corinth, Kevin. "The Impact of Permanent Supportive Housing on Homeless Populations." *Journal of Housing Economics* 35 (2017) 69-84. Page 75. Available at: https://ac.els-cdn.com/S1051137715300474/1-s2.0-S1051137715300474-main.pdf?_tid=0cedc104-ba9c-11e7-a99d-00000aacb35f&acdnat=1509056685_fceb158ca8e69a34586fd1d9d46ba052

¹⁹ Corinth, Kevin. "The Impact of Permanent Supportive Housing on Homeless Populations." *Journal of Housing Economics* 35 (2017) 69-84. Page 80.

Cumulative Impacts

The PSH Ordinance is not the only ordinance currently under consideration by the City to address homelessness. The City is concurrently considering an Interim Motel Conversion Ordinance (CPC-2017-3409-CA; ENV-2017-3410-ND). Although the case numbers for the Motel Conversion appear to indicate that a Negative Declaration has been prepared for the Motel Conversion Ordinance, the Negative Declaration does not appear to be available on the City's website. The environmental document for the PSH Ordinance should include the cumulative projects resulting from the Motel Conversion Ordinance and should address the potential cumulative impacts associated with the City's full Comprehensive Homeless Strategy.

4. CONCLUSION

The City has not proceeded in the manner prescribe by law regarding the environmental documentation for the PSH Ordinance. The City must therefore take the following actions:

- Void the actions taken by the Planning Commission regarding the PSH Ordinance and the associated environmental documents;
- Prepare a single environmental document for the PSH Ordinance and circulate that document for public review in accordance with the requirements for projects of area-wide significance;
- Provide Notice of the Availability of the revised document to all those who have comment on the environmental documents or the PSH Ordinance, including Channel Law.

Thank you in advance for your thoughtful consideration of these issues of concern. I maybe contacted at 310-982-1760 or at jamie.hall@channellawgroup.com if you have any questions, comments or concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jamie T. Hall', is centered on the page. The signature is fluid and cursive.

Jamie T. Hall

ATTACHMENTS:

1. Channel Law letter dated October 30, 2017 regarding: Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV- 2017-3137-EAF) and Notification of Non-Compliance with CEQA with Regard to the Permanent Supportive Housing Ordinance and Proposed Redevelopment of Venice Dell Pacific Site located at 125 E. Venice Blvd (APN 4238-024-900 to 911)
2. Planning Commission Letter of Determination Regarding the PSH Ordinance and Associated CEQA Documents and the Planning Commission Meeting Audio Links for the December 14, 2017 Hearing, See Item 12.
3. City of Los Angeles Parcel Profile Reports (ZIMAS Reports) For Two Parcels In the Coastal Zone.
4. Location of PSH Ordinance Eligible Parcels.
5. Notice of Intent to Adopt MND from City's Website
6. CEQANet, State Clearinghouse Records for SCAG's RTP/SCS EIR.

Attachments To The
Channel Law Comments On The Environmental Documentation For, And The,
Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And
Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd
(APN 4238-024-900 To 911)
December 20, 2017

**ATTACHMENTS TO CHANNEL LAW LETTER DATED DECEMBER 20, 2017
REGARDING THE PERMANENT SUPPORTIVE HOUSING ORDINANCE
AND ASSOCIATED ENVIRONMENTAL DOCUMENTS**

Attachments:

1. Channel Law letter dated October 30, 2017 regarding: Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV- 2017-3137-EAF) and Notification of Non-Compliance with CEQA with Regard to the Permanent Supportive Housing Ordinance and Proposed Redevelopment of Venice Dell Pacific Site located at 125 E. Venice Blvd (APN 4238-024-900 to 911)
2. Planning Commission Letter of Determination Regarding the PSH Ordinance and Associated CEQA Documents and the Planning Commission Meeting Audio Links for the December 14, 2017 Hearing, See Item 12.
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Attachments To The
Channel Law Comments On The Environmental Documentation For, And The,
Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And
Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd
(APN 4238-024-900 To 911)
December 20, 2017

Attachment 1

Channel Law letter dated October 30, 2017 regarding: Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV- 2017-3137-EAF) and Notification of Non-Compliance with CEQA with Regard to the Permanent Supportive Housing Ordinance and Proposed Redevelopment of Venice Dell Pacific Site located at 125 E. Venice Blvd (APN 4238-024-900 to 911)

Channel Law Group, LLP

8200 Wilshire Blvd.
Suite 300
Beverly Hills, CA 90211

Phone: (310) 347-0050
Fax: (323) 723-3960
www.channellawgroup.com

JULIAN K. QUATTLEBAUM, III *
JAMIE T. HALL **
CHARLES J. McLURKIN

Writer's Direct Line: (310) 982-1760
jamie.hall@channellawgroup.com

-
*ALSO Admitted in Colorado
**ALSO Admitted in Texas

October 30, 2017

VIA ELECTRONIC MAIL

Los Angeles Planning Commission
Department of City Planning,
City Hall - Room 763,
200 North Spring Street,
Los Angeles CA 90012

Via email: cally.hardy@lacity.org

Re: Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137-EAF) and Notification of Non-Compliance with CEQA with Regard to the Permanent Supportive Housing Ordinance and Proposed Redevelopment of Venice Dell Pacific Site located at 125 E. Venice Blvd (APN 4238-024-900 to 911)

Dear Planning Commissioners:

This firm represents Venice Vision with regard to the proposed development at 125 E. Venice Boulevard as well as the City's proposed Permanent Supportive Housing Ordinance. The City released a Notice of a Public Hearing on the Permanent Supportive Housing Ordinance (proposed Ordinance). The Notice listed two meeting dates: September 25, 2017 and September 28, 2017 and indicated that last day to submit comments to staff was October 30, 2017. The Notice indicated that after October 30, 2017 comments should be addressed to the City Planning Commission, but did not provide the date by which such comments should be provided. The Notice also did not indicate when the City Planning Commission would consider the proposed Ordinance. In addition the Notice provides no information on California Environmental Quality Act (CEQA) document availability for the proposed Ordinance.

Permanent Supportive Housing Ordinance Lack of CEQA Document

The timeline provided in the presentation materials at the Staff Public Hearing of September 25, 2017 indicates that the CEQA document would be completed by the time the Draft Ordinance was released for public comment (see **Attachment 1**), yet it appears no CEQA

document has been completed. Lack of a CEQA document inhibits the ability of the public to comment on, or fully understand, the potential impacts of the proposed Ordinance.

Given the project numbers assigned to the proposed Ordinance (CPC-2017-3136-CA; ENV-2017-3137-EAF) it appears only the City's Environmental Assessment Form (EAF) may have been completed to date for the Ordinance, and this document is not available on the City's website. An Environmental Assessment Form is not one of the three types of environmental documents specified in CEQA and the CEQA Guidelines. No action should be taken on the Ordinance until the appropriate CEQA document has been prepared and circulated for public review per the CEQA Guidelines.¹

Please contact us and provide information on the timeline for CEQA compliance and the type of CEQA document to be prepared. Indicate how participation in the CEQA process will be coordinated with the Ordinance review and consideration process. Please provide any notices or other information regarding this Ordinance to us at the address listed on our letterhead.

Inaccurate Project Description

The Frequently Asked Questions (and answers) attached to the Notice provides the following information:

Qualified PSH Projects would be allowed in zones that allow a multifamily residential use (RD zone and less restrictive).²

Per State law in California SB 2 (2007), PSH projects are required to be treated the same as any residential use in the same zone. This means that PSH projects can be built anywhere a multifamily residential building is allowed under the Zoning Code. The proposed ordinance does not change where PSH units are currently allowed in the city.³

This is misleading. Allowable uses in the Public Facilities (PF) zone currently are as follows (emphasis added):

B. Use. The following regulations shall apply to publicly owned land classified in the "PF" Public Facilities Zone. No building, structure or land shall be used and no building or structure shall be erected, moved onto a site, structurally altered, enlarged or maintained, except for the following uses:

1. Farming and nurseries, under power transmission rights-of-way. (Amended by Ord. No. 181,188, Eff. 7/18/10.)
2. Public parking facilities located under freeway rights-of-way.
3. Fire stations and police stations.

¹ See for example CEQA Guidelines 15075, 15089 and 15090.

² Notice, page 1.

³ Notice, page 3.

4. (Amended by Ord. No. 173,492, Eff. 10/10/00.) Government buildings, structures, offices and service facilities including maintenance yards, provided, however, that those uses identified in Section 12.24U21 shall require conditional use approval pursuant to that section.

5. Public libraries not located inside public parks.

6. Post offices and related facilities.

7. Public health facilities, including clinics and hospitals.

8. Public elementary and secondary schools.

9. Any joint public and private development uses permitted **in the most restrictive adjoining zones** if approved by the Director utilizing the procedures described in Section 16.05E to H. The phrase “adjoining zones” refers to the zones on properties abutting, across the street or alley from or having a common corner with the subject property. If there are two or more different adjoining zones, then **only the uses permitted by the most restrictive zone shall be permitted.**

10. (Amended by Ord. No. 174,132, Eff. 9/3/01.) Conditional uses as allowed pursuant to Section 12.24 U 21 and Section 12.24 W 49 of this Code when the location is approved pursuant to the provisions of the applicable section.⁴

The proposed Ordinance amends the Public Facilities (PF) Zone, to allow for automatic rezoning to allow for a qualified Permanent Supportive Housing Project as follows (emphasis added):

SEC. 12.04.09. “PF” PUBLIC FACILITIES ZONE.

9. Any joint public and private development uses permitted in the most restrictive adjoining zones if approved by the Director utilizing the procedures described in Section 16.05 E to H. The phrase “adjoining zones” refers to the zones on properties abutting, across the street or alley from or having a common corner with the subject property. If there are two or more different adjoining zones, then only the uses permitted by the most restrictive zone shall be permitted. **If the joint public and private development is a Qualified Permanent Supportive Housing Project developed pursuant to Section 14.00 A.11 of this Code, the uses and standards permitted by the least restrictive zone within a 1,320 foot radius shall be permitted utilizing the procedures described therein.**

The ordinance thus allows for automatic rezoning of a PF zone consistent with **the least restrictive zone within a 1,320 foot radius** for a Permanent Supportive Housing (PSH) project. Under the Ordinance Qualified PSH Projects would be allowed in a zone that currently may not allow multifamily residential.

⁴ Los Angeles Municipal Code, Chapter 1, Section 12.04.09 B.

Please explain how the 1,320-foot radius figure was selected. Please indicate how much of the parcel with less restrictive zoning must be within the 1,320-foot radius for the PF zoned parcel to take on the less restrictive zoning.

Inadequate Notice - Failure to Disclose Creation of A New CEQA Exemption

CEQA applies to discretionary approvals.⁵ Section 16.05 B.2 of the City's Municipal Code (LAMC) defines a discretionary approval as including:

2. Discretionary Approval. (Amended by Ord. No. 184,827, Eff. 3/24/17.) An approval initiated by application of a property owner or representative related to the use of land including, but not limited to a:

- (a) zone change;
- (b) height district change;
- (h) coastal development permit;
- (i) development agreement;
- (k) density bonus greater than the minimums pursuant to Government Code Section 65915;
- (m) exception from a geographically specific plan;
- (o) public benefit projects; or
- (p) floor area deviation of less than 50,000 square feet pursuant to [14.5.7](#) of [Article 4.5](#) of the Los Angeles Municipal Code.

Currently PF zoning allows joint public and private development uses permitted **in the most restrictive adjoining zones** if approved by the Director utilizing the procedures described in **Section 16.05E to H**.

Section 16.05E(4) of the Planning and Zoning Code specifies the following:

4. The Director shall not approve or conditionally approve a site plan review for a development project unless an appropriate environmental review clearance has been prepared in accordance with the requirements of CEQA. (Amended by Ord. No. 185,052, Eff. 8/14/17.)

Please verify that this requirement would continue to apply to joint public and private development uses in the PF Zone and that they would continue to be subject to the requirement to complete environmental review pursuant to CEQA.

⁵ CEQA Guidelines 15002(i).

The Notice fails to disclose that the Ordinance creates a new CEQA exemption for PSH projects in two sections of the Ordinance, and that this new exemption is inconsistent with Public Resources Code (CEQA) Section 21159.21 and does not require compliance with Public Resources Code (PRC) Section 21159.23. PRC Section 21159.21 provides the criteria for qualifying for housing project exemptions⁶ and PRC Section 21159.23 provides for an exemption for low-income housing for residential housing consisting of 100 or fewer units.⁷ Pursuant to CEQA a low-income housing project would not qualify for an exemption “if there is a reasonable possibility that the project would have a significant effect on the environment or the residents of the project due to unusual circumstances or due to the related or cumulative impacts of reasonably foreseeable projects in the vicinity of the project.”⁸ Pursuant to PRC Section 21159.21, a low income housing project would not qualify for an exemption if it is inconsistent with any applicable general plan, specific plan or local coastal program; community-level environmental review has not been adopted or certified; existing utilities are not adequate to serve the project; the site is on a list of hazardous materials sites; the project would impact historical resources; or is in a hazards area.

In contrast, the Ordinance provides for an exemption for PSH projects, by adding the following language to Article 6.1 – Review of Development Projects, Section 16.05D – Exemptions,⁹ via Section 4 of the Ordinance:

Section 4. Subdivision 8 of Subsection D of Section 16.05 of the Los Angeles Municipal Code is added to read as follows:

8. A Qualified Permanent Supportive Housing Project developed pursuant to Section 14.00 A.11 of this Code and containing no more than 120 units, or no more than 200 units if it is located in the Greater Downtown Housing Incentive Area.¹⁰

The Ordinance thus allows for exemption of PSH projects with a larger number of units than would be allowed under existing CEQA exemptions. This change to existing CEQA exemptions, to create a less restrictive exemption for PSH projects is a discretionary action subject to CEQA review.

Please verify that under Section 4, PSH projects with more than 120 units outside of the Greater Downtown Housing Incentive Area would still be subject to CEQA. Please discuss how the threshold levels of 120 outside Downtown and 200 in Downtown were selected. If the Ordinance creates an exemption for a higher number of units than provided for under CEQA, it must be demonstrated that no significant impacts would occur.

In addressing whether it is appropriate to increase the size of the low-income housing (i.e. PSH) projects eligible for an exemption, the environmental document for the Ordinance should

⁶ See also CEQA Guidelines Section 15192.

⁷ See also CEQA Guidelines Section 15194.

⁸ CEQA (Public Resources Code) 21159.23(c).

⁹ Section 16.05D states: “Unless made discretionary by any other provision of law, the approval of any building permit for a development project which does not exceed the thresholds set forth in this subsection and Section 12.24U14 is ministerial and exempt from the requirements of the California Environmental Quality Act.

¹⁰ Page 9, Draft Ordinance 8/30/2017.

address the fact that the Minnesota Housing Finance Agency's Research and Evaluation Unit in their review of housing studies found:¹¹

Impact on Neighborhood Crime

Research on the relationship between affordable housing and crime identifies project scale as the most important factor in determining the impact on neighborhood crime rates. Multiple studies find that smaller projects (typically less than 50 units) have no impact on neighborhood crime, but that larger projects may result in increased crime. This finding was common across multiple types of affordable housing, including non-profit rental housing, public housing, and supportive housing.

Although Section 4's new CEQA exemption limits the size of PSH projects exempted from CEQA, Section 2 (11b) of the Ordinance also provides that:

The (Permanent Supportive Housing) application shall be approved by the Director of Planning through a ministerial Public Benefit process if the eligibility criteria and performance standards of this subsection are met.

As written, it is unclear whether Section 2(11b) would apply only to PSH projects "containing no more than 120 units, or no more than 200 units if it is located in the Greater Downtown Housing Incentive Area" per Section 4, or to all PSH projects. Do the size limits in Section 4 constitute "eligibility criteria"? This needs to be clarified. Please provide information on the correct reading of the two sections and the nature of limitations on PSH projects that would be exempted from CEQA under the Ordinance. Pursuant to PRC Section 21159.23, no exemption should every be granted if there is a reasonable possibility that the project would have a significant effect on the environment or the residents of the project due to unusual circumstances or due to the related or cumulative impacts of reasonably foreseeable projects in the vicinity of the project.

In addition to increasing the size of a low income housing project exempt from CEQA, as written, the Ordinance allows for automatic rezoning for Permanent Supportive Housing and deems the approval of any such housing project a ministerial act, thus exempting it from CEQA analysis, even though PSH projects are likely to fall within the definition of a discretionary approval pursuant to LAMC Section 16.05 B.2(a). The Notice fails to disclose this important aspect of the proposed Ordinance.

The City is thus appears to be considering approval of an Ordinance that increases the size of low income housing project eligible for an exemption and provides for a new automatic rezoning process for PSH projects in the PF Zone without conducting the required CEQA review, for either the Ordinance or requiring CEQA review at the project level. This is unacceptable and is contrary to CEQA. The City is required to comply with CEQA prior to consideration of the Ordinance. Failure to do so deprives decision-makers and the public of important information regarding both the details and implications of the Ordinance and its potential environmental impacts.

Inadequate Notice - Inadequate Project Description

¹¹ Discussion Paper, Impact of Affordable Housing on Communities and Households, Minenesota Housing Finance Agency, page 4.

Number and Location of PSH Developments - No information is provided in the Notice, or the non-existent CEQA document regarding the number and likely location of parcels zoned PF that may be automatically rezoned under the Ordinance to provide for Permanent Supportive Housing (PSH). This information is necessary in order to understand the details and implications of the Ordinance and its potential environmental impacts.

In addition, little information is provided on the likely locations of the Permanent Supportive Housing that the City seeks to have constructed in other zones throughout the City. This information is necessary in order to understand the details and implications of the Ordinance and its potential environmental impacts.

The Notice fails to disclose that the City has already issued a Request for Qualifications/Proposals (RFP) for the Affordable Housing Opportunity Sites.¹² The RFP identifies eight potential sites for permanent supportive housing and other types of affordable housing on City-owned land. Are there any other sites within the City anticipated to be used for Permanent Supportive Housing? Please provide information on potential sites as part of the environmental review of the Ordinance.

The following table summarized the information provided about those sites in the RFP:

SITES FOR PERMANENT SUPPORTIVE HOUSING AND OTHER TYPES OF AFFORDABLE HOUSING ON CITY-OWNED LAND IDENTIFIED IN CITY'S RFP			
LOT	PROPERTY IS ZONED	PARCEL SIZE IS APPROXIMATELY	NOTES
Lincoln Heights DOT Lot Number 697 2332-2340 N. Workman Street APN: 5204-016-901	[Q]C4-1XL-CDO RAS3-1VL-CDO	6,600 s.f.	One of five non-contiguous lots located behind North Broadway commercial storefronts. If a development strategy incorporates all of the Lincoln Heights DOT lots, replacement parking for all of the lots must be included.
Lincoln Heights DOT Lot Number 658 216-224 S. Avenue 24 APN: 5204-005-901	PF-1-CD0 RAS3-1VL-CDO	19,379 s.f.	One of five non-contiguous lots located behind North Broadway commercial storefronts. Replacement public parking does not need to be assumed in the development submission for a single Lincoln Heights DOT lot, though it may be incorporated as

¹² Submission deadline: September 15, 2016. Available at: <http://cao.lacity.org/AHOSRFQ.PDF>

SITES FOR PERMANENT SUPPORTIVE HOUSING AND OTHER TYPES OF AFFORDABLE HOUSING ON CITY-OWNED LAND IDENTIFIED IN CITY'S RFP			
LOT	PROPERTY IS ZONED	PARCEL SIZE IS APPROXIMATELY	NOTES
			part of the eventual project.
Lincoln Heights DOT Lot Lot Number 659 2331-2337 N. Workman Street and 2332-2338 N. Daly APN: 5204-011-903	PF-1-CD0 RAS3-1VL-CDO	37,200 s.f.	One of five non-contiguous lots located behind North Broadway commercial storefronts.
Lincoln Heights DOT Lot Lot Number 661 2416-2422 N. Workman Street APN: 5204-015-901	PF-1-CD0 RAS3-1VL-CDO	16,502 s.f.	One of five non-contiguous lots located behind North Broadway commercial storefronts.
Lincoln Heights DOT Lot Lot Number 660 154 -164 S. Avenue 24 APN: 5204-004-901	PF-1-CD0 RAS3-1VL-CDO	20,295 s.f.	One of five non-contiguous lots located behind North Broadway commercial storefronts.
Hillside Parcel 11681 W. Foothill Blvd, Sylmar APN: 2530-008-901	(T)RD2-1	132,095 s.f.	
Imperial Lot 283 W. Imperial Highway APN: 6074-024-900	C2-1	17,385 s.f.	
Thatcher Yard 3233 S. Thatcher Ave APN: 4229-002-901	(Q) PF-1XL RD1.5	93,347 s.f.	A Coastal Development Permit from the City of Los Angeles will be required, and Coastal Commission approval may be required on appeal.
Old West L.A. Animal Shelter 11950 Missouri Ave APN: 4259-020-900	PF-1-XL and M2-1 R3	32,642 s.f.	
Old Fire Station #5 6621 W. Manchester Ave	R1-1 R3	19,507 s.f.	Improved with an abandoned fire station.

SITES FOR PERMANENT SUPPORTIVE HOUSING AND OTHER TYPES OF AFFORDABLE HOUSING ON CITY-OWNED LAND IDENTIFIED IN CITY'S RFP			
LOT	PROPERTY IS ZONED POTENTIAL FUTURE ZONING IS	PARCEL SIZE IS APPROXIMATELY	NOTES
APN: 4112-029-900			
Venice Dell Pacific Site 125 E Venice Blvd. APN: 4238-024-900 to 911	OS-1SL-O R3	122,171 s.f.	Developments must comply with the Venice Specific Plan. A Coastal Development Permit from the City of Los Angeles will be required, and approval from the California Coastal Commission will also be required.
Old Fire Station #53 438 N. Mesa Street APN: 7449-009-900	R2-1X	8,990 s.f.	The property is improved with an abandoned fire station.
Source: http://cao.lacity.org/AHOSRFQ.PDF			

Please provide information on the number of units that could potentially be developed on each of these sites under the Ordinance with an explanation of how the number was calculated and Ordinance provisions were applied.

According to the RFT, two of the sites, Thatcher Yard and the Venice Dell Pacific Site, require a Coastal Development Permit. Under Section 16.05 B.2 of the LAMC, preparation of an environmental document is required for this type of “discretionary” permit. However, proposed Section 2(11b) of the Ordinance would exempt the eight sites from environmental review. Pursuant to CEQA Guidelines Section 15268(d):

Where a project involves an approval that contains elements of both a ministerial action and a discretionary action, the project will be deemed to be discretionary and will be subject to the requirements of CEQA.

At a minimum, project level environmental review will be required for a PSH project on either the Thatcher Yard or Venice Dell Pacific Site. The Ordinance should be amended to require compliance with CEQA Guidelines Section 15268(d).

Concession and Incentives - Increased Density, Height etc. - Section 2, 11 – Permanent Supportive Housing (d – Zoning Compliance) states that (emphasis added):

(1) Minimum Lot Area per Dwelling Unit or Guest Room. In zones where multiple dwelling uses are permitted (R3 and less restrictive), the number of allowable dwelling units or guest rooms shall not be subject to the otherwise maximum allowable residential density under any applicable zoning ordinance and/or specific plan. In the RD1.5 Zone, the minimum lot area per dwelling unit or guest room shall be 500 square feet. **All applicable standards pertaining to**

height and floor area under any applicable zoning ordinance and/or specific plan or overlay shall apply.

However, Section 2, 11 – Permanent Supportive Housing (e - Additional Concessions or Incentives) states (emphasis added):

(d) Zoning Compliance. A Qualified Permanent Supportive Housing Project meeting the requirements in Paragraph (c) and the performance standards in Paragraph (g) must comply with all objective requirements in any applicable zoning code, specific plan or overlay district regulations **except**:

Section 2,11(d) then provides for a PSH project to obtain up to four concessions or incentives, from a list that includes: decreased yard/setback requirements; increased lot coverage limits; increased floor area ratio; increase height; decreased open space, averaging floor area ratio; parking or open space across two or more contiguous parcels.

Section 2,11(d)'s statement that "All applicable standards pertaining to height and floor area under any applicable zoning ordinance and/or specific plan or overlay shall apply," appears contradicted by Section 2,11(e). Please explain how this apparent contradiction would be resolved by providing examples of PSH projects in several zones, as they would look under existing zoning, as compared to under the Ordinance. It is important for the environmental document for the Ordinance to address consistency of the Ordinance with existing area plans and design guidelines.

Inadequate Requirements for the Provision Of Supportive Services

Although the Ordinance requires that PSH projects record a covenant acceptable to the Housing and Community Investment Department (HCIDLA) that reserves and maintains the number of dwelling units designated as restricted affordable for at least 55 years from the issuance of the Certificate of Occupancy, it does not appear that the Ordinance similarly requires the provision of supportive services on an on-going basis for the life of the project, or provides a mechanism to ensure that supportive services are being provided consistently over the life of the project and that they are adequate for the needs of a PSH project's target population. In addition, the Ordinance does not establish minimum required levels of support services to be provided at each PSH.

Whereas PSH projects are generally not associated with an increase in crime and a decrease in property values¹³, the same is not true for shelters or public housing projects that do

¹³ There is some evidence, however, that PSH facilities may lead to a decrease in property values when located in higher income areas. According to "The Impacts of Supportive Housing on Neighborhoods and Neighbors, The Urban Institute (October 1999), George Galster et al, page xii:

While the *average* relationship between this set of supportive housing facilities and proximate house prices was positive, not all site/neighborhood combinations in Denver experienced the same relationship. When we disaggregated our analysis to measure impacts for different common clusters of sites/neighborhoods, we found that the set of five supportive housing sites located in low-valued, heavily minority-occupied (typically majority Black-occupied) neighborhoods consistently evinced the positive price impacts noted above. By contrast, the site in the highest-value, overwhelmingly white-occupied neighborhood apparently had a *negative* effect on house prices, as did another (poorly maintained) site in a modestly valued, high-density core neighborhood having 24 percent of its population classified as Hispanic.

not provide supportive services for the target populations specified in Section 2, 11(a)(2) – Target Population of the Ordinance, or for poorly managed or maintained facilities.¹⁴ The nature and quality of the supportive services are important to ensuring surrounding neighborhoods will not experience an increase in crime or decrease in property values.

Issues to Address in the Environmental Analysis of the Proposed Ordinance

In addition to addressing the impact on the Ordinance on consistency with existing area plans and regulations, as well as the other CEQA Checklist issue areas, the environmental document for the Ordinance should address:

Growth Inducing Impacts - Recent research has indicated the potential for the construction of PSH to induce in-migration of additional homeless into a Continuum of Care (CoC) area¹⁵ or inhibit out-migration of homeless. As explained by Corinth:

One potentially important factor that could affect estimates of associations between PSH and homelessness is migration. A CoC that expands its inventory may experience an inflow of homeless people seeking services or a reduced outflow of homeless people to other CoCs.¹⁶

Between 2007 and 2014, communities across the United States rapidly expanded the inventory of PSH beds for homeless individuals with disabling conditions. . . I find that each additional PSH bed was associated with between 0.04 and 0.12 fewer homeless people after one year. Causal effects identified on the basis of lagged funding decisions imply that one additional PSH bed reduces homeless counts by up to 0.10 people. Effect sizes of greater than 0.72 can be rejected at the 95% confidence level, ruling out the simple reasoning that adding one unit of housing reduces homelessness by one person. Relatively modest effects may be explained by some combination of poor targeting, differential exit rates into private housing from PSH relative to homelessness, incentives for remaining homeless, errors in homeless counts, and migration in response to expanded PSH. Indeed, PSH expansion in the rest of a state is associated with significant reductions in homeless counts within a community, consistent with homeless migration in response to PSH expansion.¹⁷

¹⁴ Ibid, page xiv:

Our central finding—that supportive housing generally has a positive impact on neighborhoods when done at a small scale, but that poorly managed properties can be deleterious to neighborhoods—implies that public policy would do well to encourage both public education and high-quality operation in the realm of supportive housing. Our findings also strongly suggest that the public sector pay strict attention to the ongoing operation, tenant management, and physical maintenance of supportive housing facilities.

¹⁵ A Continuum of Care (CoC) is a regional or local planning body that coordinates housing and services funding for homeless families and individuals. There are 414 CoCs in the United States. The Los Angeles CoC covers the Los Angeles County area, but excludes the cities of Glendale, Pasadena and Long Beach.

¹⁶ Corinth, Kevin. “The Impact of Permanent Supportive Housing on Homeless Populations.” *Journal of Housing Economics* 35 (2017) 69-84. Page 75. Available at: https://ac.els-cdn.com/S1051137715300474/1-s2.0-S1051137715300474-main.pdf?_tid=0cedc104-ba9c-11e7-a99d-00000aacb35f&acdnat=1509056685_fceb158ca8e69a34586fd1d9d46ba052

¹⁷ Corinth, Kevin. “The Impact of Permanent Supportive Housing on Homeless Populations.” *Journal of Housing Economics* 35 (2017) 69-84. Page 80.

The environmental analysis for the proposed Ordinance should therefore address the growth-inducing impacts of the proposed Ordinance.

Cumulative Impacts – The PSH Ordinance is not the only ordinance currently under consideration by the City to address homelessness. The City is concurrently considering an Interim Motel Conversion Ordinance (CPC-2017-3409-CA; ENV-2017-3410-ND). Although the case numbers for the Motel Conversion appear to indicate that a Negative Declaration has been prepared for the Motel Conversion Ordinance, the Negative Declaration does not appear to be available on the City’s website. The environmental document for the PSH Ordinance should include the cumulative projects resulting from the Motel Conversion Ordinance and should address the potential cumulative impacts associated with the City’s full Comprehensive Homeless Strategy.

Increase in Water Demand - According to page 1 of the Background and Frequently Asked Questions portion of the Notice:

According to the City’s Comprehensive Homeless Strategy, a total of 1,000 PSH units need to be constructed annually to house the City’s homeless population – a significant increase from the current annual supply of 300 units. To help meet these goals, the Los Angeles electorate adopted Measure HHH in November 2016, a voter initiative that will create \$1.2 billion in new funding over the next decade to construct PSH units. The voters also adopted Measure H in March 2017, a County-wide measure that will provide ongoing funding to support rent subsidies and services for PSH, among other homeless services.

It thus appears the City is seeking to increase the production of PSH by 700 units per year. CEQA Guidelines Section 15155 requires the City to consult with the applicable water agency for any water-demand project, including residential development of more than 500 units, as part of the preparation of the environmental document for the project (in this case the Ordinance). Given that the intent of the Ordinance is to increase the production of PSH, with a goal of at least an additional 700 units per year, as part of the preparation of the environmental document for the Ordinance, the City should consult with the applicable water agency to determine if the intended effects of the Ordinance were included in the most recently adopted urban water management plan and to prepare a water assessment approved at a regular or special meeting of that governing body.

The Ordinance Needs to Be Amended

The Ordinance needs to be amended to:

- Remove the new CEQA exemption for PSH projects; instead the existing CEQA low-income housing exemption should be applied.
- Include language in the Ordinance to make clear that pursuant to CEQA Guidelines Section 15268(d) where a PSH project “involves an approval that contains elements of both a ministerial action and a discretionary action, the project will be deemed to be discretionary and will be subject to the requirements of CEQA.”

- Allow for automatic rezoning of only those parcels addressed in the environmental document for the proposed Ordinance, or specifically addressed in the environmental document for the applicable area plan.
- Add requirements for provision of an appropriate level of supportive services to be maintained over the life of individual PSH projects.

Conclusion

Thank you in advance for your thoughtful consideration of these issues of concern. I may be contacted at 310-982-1760 or at jamie.hall@channellawgroup.com if you have any questions, comments or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Jamie T. Hall". The signature is fluid and cursive, with the first name "Jamie" being the most prominent part.

Jamie T. Hall

ATTACHMENTS:

1. Page showing CEQA Timeline presented at City's informational meeting on the PSH Ordinance

cc: Councilman Mike Bonin
City Attorney Mike Feuer
Members of Los Angeles City Council

Project Timeline

		Preparation of CEQA Document		Public Hearings	
	Initial Outreach		Public Comment Period		
Project Launch	Identify Draft Ordinance Concepts		Release Draft Ordinance	City Planning Commission	City Council Adoption
Summer 2016	Fall 2016 – Spring 2017		Summer 2017	Fall 2017	Winter 2017-18

October 30, 2017

*Deadline to submit public comment to
cally.hardy@lacity.org*



Attachments To The
Channel Law Comments On The Environmental Documentation For, And The,
Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And
Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd
(APN 4238-024-900 To 911)
December 20, 2017

Attachment 2
Planning Commission Letter of Determination Regarding the PSH
Ordinance and Associated CEQA Documents and the Planning
Commission Meeting Audio Links for the December 14, 2017 Hearing,
See Item 12.



LOS ANGELES CITY PLANNING COMMISSION

200 North Spring Street, Room 532, Los Angeles, California, 90012-4801, (213) 978-1300

www.planning.lacity.org

LETTER OF DETERMINATION

MAILING DATE: DEC 19 2017

Case No.: CPC-2017-3136-CA

Council Districts: All

CEQA: ENV-2017-3137-MND

SCAG 2016-2040 RTP/SCS PEIR (SCH No. 2015031035)

Plan Areas: All

Project Site: Citywide

Applicant: City of Los Angeles
Representative: Cally Hardy, Planning Assistant

At its meeting of **December 14, 2017**, the Los Angeles City Planning Commission took the actions below in conjunction with the approval of the proposed ordinance:

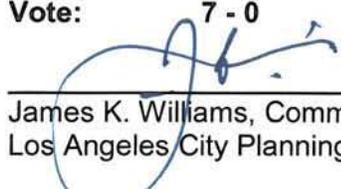
An ordinance amending Sections 12.03, 12.04.09, 14.00, and 16.05 of the Los Angeles Municipal Code establishing regulations to facilitate the production of Permanent Supportive Housing.

1. **Found** pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including Mitigated Negative Declaration No. ENV-2017-3137-MND (Mitigated Negative Declaration), and all comments received, with imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; **Found** that the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; **Found** the mitigation measures have been made enforceable conditions on the project; and adopt the Mitigated Negative Declaration; and **Adopted** the Mitigated Negative Declaration and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;
2. **Approve** and **recommend** that the City Council **find**, based on their independent judgement, after consideration of the whole of the administrative record, including the SCAG 2016-2040 RTP/SCS PEIR (SCH No. 2015031035), certified on April 7, 2016 (EIR) and the Addendum prepared for the PSH Ordinance (Addendum), the project was assessed in the EIR and pursuant to the CEQA Guidelines, Sections 15162 and 15164 and the Addendum that no major revisions to the EIR are required and no subsequent EIR, or negative declaration is required for approval of the project;
3. **Adopted** the staff report as the Commission report on the subject;
4. **Approved** and **recommended** that the City Council **adopt** the proposed ordinance, as amended by the Commission, subject to review by the City Attorney as to form and legality; and
5. **Adopted** and **recommended** that the City Council **adopt** the attached Findings.

The vote proceeded as follows:

Moved: Ambroz
Second: Khorsand
Ayes Choe, Dake Wilson, Millman, Padilla Campos, Perlman
Absent: Mitchell, Mack

Vote: 7 - 0



James K. Williams, Commission Executive Assistant II
Los Angeles City Planning Commission

Effective Date/Appeals: The decision of the Los Angeles City Planning Commission is final and not appealable.

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

Attachments: Ordinance, Findings

c: Ken Bernstein, Principal Planner
Arthi Varma, Principal City Planner
Claire Bowin, Senior City Planner
Matthew Glesne, City Planner
Cally Hardy, Planning Assistant

Información en Español acerca de esta junta puede ser obtenida Llamando al (213) 978-1300

COMMISSION MEETING AUDIO

CITY PLANNING COMMISSION
REGULAR MEETING AGENDA
THURSDAY, DECEMBER 14, 2017 after 8:30 a.m.
LOS ANGELES CITY HALL, COUNCIL CHAMBERS ROOM 340
200 NORTH SPRING STREET, LOS ANGELES, CALIFORNIA 90012

CLICK ON THE [BLUE](#) LINKS BELOW TO LISTEN TO AUDIO FROM THE MEETING

**TO REQUEST A COPY ON COMPACT DISC,
PLEASE CONTACT THE DEPARTMENT OF CITY PLANNING PUBLICATIONS AT (213) 978-1255**

1. [**DIRECTOR'S REPORT**](#)

- Update on City Planning Commission Status Reports and Active Assignments
- Legal actions and issues update
- Other Items of Interest

2. [**COMMISSION BUSINESS**](#)

- Advance Calendar
- Commission Requests
- Minutes of Meeting – November 9, 2017; November 16, 2017

3. [**NEIGHBORHOOD COUNCIL PRESENTATION**](#)

Presentation by Neighborhood Council representatives on any Neighborhood Council resolution, or community impact statement filed with the City Clerk, which relates to any agenda item listed or being considered on this agenda. The Neighborhood Council representative shall provide the Board or Commission with a copy of the Neighborhood Council's resolution or community impact statement. THESE PRESENTATIONS WILL BE TAKEN AT THE TIME THE AGENDA ITEM IS CALLED FOR CONSIDERATION.

4. [**GENERAL PUBLIC COMMENT**](#)

The Commission shall provide an opportunity in open meetings for the public to address it **on non-agenda items**, for a cumulative total of up to thirty (30) minutes, on items of interest to the public that are within the subject matter jurisdiction of the Commission.

PERSONS WISHING TO SPEAK MUST SUBMIT A SPEAKER'S REQUEST FORM. ALL REQUESTS TO ADDRESS THE COMMISSION ON **NON-AGENDA ITEMS** AND ITEMS OF INTEREST TO THE PUBLIC THAT ARE WITHIN THE JURISDICTION OF THE COMMISSION MUST BE SUBMITTED PRIOR TO THE COMMENCEMENT OF THE PUBLIC COMMENT PERIOD.

5. **RECONSIDERATIONS**

- 5a. **MOTIONS TO RECONSIDER** - The Commission may make a motion to reconsider a Commission Action on any agenda items from its previous meeting, consistently with the Commission Rule 8.3, provided the Commission retains jurisdiction over the matter.
- 5b. **MERITS OF ANY ITEM THE COMMISSION HAS VOTED TO RECONSIDER** – If a majority of the Commission has approved a motion to reconsider a Commission Action, the Commission may address the merits of the original Commission Action.

6. **CONSENT CALENDAR (None)**

Consent Calendar items are considered to be not controversial and will be treated as one agenda item. The Consent Calendar will be enacted by one motion. There will be no separate discussion of these items unless the item is removed from the Consent Calendar, in which event the item will be considered as time allows on the regular agenda.

- 6a. **CPC-2014-4942-ZC-HD-DB-SPR**
CEQA: ENV-2014-4943-MND
Plan Area: Wilshire

Council District: 1 - Cedillo
Last Day to Act: 12-19-17

PUBLIC HEARING – Completed July 24, 2017

PROJECT SITE: 2501 – 2515 West Olympic Boulevard;
980 – 992 South Arapahoe Street;
981 South Hoover Street

PROPOSED PROJECT:

Construction of a new seven-story, mixed-use development consisting of 173 residential units and 36,990 square feet of commercial uses with a total of 262 on-site vehicle parking spaces (201 spaces for residential uses, 61 spaces for commercial uses) located within one ground floor parking level and two subterranean parking levels, on a Project Site that consists of nine (9) contiguous lots totaling 51,949 square feet in size, and is currently vacant. The building will measure approximately 92 feet in height and contain approximately 183,190 square feet of floor area. As part of this application, the Department of City Planning has initiated a Zone Change and Height District Change from C2-2 to (T)(Q)C2-1 as a technical correction to a recorded mapping error which will create consistency between the Zone designation and the General Plan Land Use designation for the C2 zoned lots.

REQUESTED ACTIONS:

1. Pursuant to CEQA Guidelines Section 15074(b), consideration of the whole of the administrative record, including the Mitigated Negative Declaration, No. ENV-2014-4943-MND (“Mitigated Negative Declaration”), Errata dated November 17, 2017, all comments received, the imposition of mitigation measures and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;

ACTIONS INITIATED BY THE DIRECTOR OF PLANNING:

2. Pursuant to Los Angeles Municipal Code (LAMC) Section 12.32 F, a Zone Change and Height District Change from C2-2 to (T)(Q)C2-1;

ACTIONS REQUESTED BY THE APPLICANT:

3. Pursuant to Section 12.22 A.25(g)(2) a 33 percent Density Bonus for a project reserving 15 percent of the base dwelling units, or 20 units, for Very Low Income Households, in conjunction with Parking Option 1 and the following three (3) On-Menu Incentives:

REQUESTED ACTIONS:

1. Pursuant to CEQA Guidelines, Section 15332, an Exemption from CEQA, and that there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies; and
2. Pursuant to Section 12.22 A.25(g)(3) of the Los Angeles Municipal Code, a 32.5 percent Density Bonus for a project totaling 26 residential dwelling units reserving 10 percent, or two (2) units, for Very Low Income Households, and utilizing parking option 1, with one Off-Menu Incentive to allow a maximum Floor Area Ratio (FAR) of 2.01:1 in lieu of a 1:1, otherwise permitted pursuant to Ordinance No. 173,606 and Section 15.A of the Colorado Boulevard Specific Plan.

Applicant: Imad Boukai, General Procurement
Representative: Heather Lee

Staff: Azeen Khanmalek, City Planning Associate
azeen.khanmalek@lacity.org
(213) 978-1336

****THE FOLLOWING ITEMS WILL BE CONSIDERED AFTER 12:00 PM****

12. [CPC-2017-3136-CA](#)
CEQA: ENV-2017-3137-MND
SCAG 2016-2040 RTP/SCS PEIR (SCH No. 2015031035)
Plan Areas: All

Council Districts: All
Last Day to Act: N/A

PUBLIC HEARING – Completed September 25, 2017 and September 28, 2017

PROJECT AREA: Citywide

PROPOSED ORDINANCE:

An ordinance amending Sections 12.03, 12.04.09, 14.00, and 16.05 of the Los Angeles Municipal Code establishing regulations to facilitate the production of Permanent Supportive Housing.

RECOMMENDED ACTIONS:

1. Pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including Mitigated Negative Declaration No. ENV-2017-3137-MND (Mitigated Negative Declaration), and all comments received, with imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; find the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; find the mitigation measures have been made enforceable conditions on the project; and adopt the Mitigated Negative Declaration;
2. Approve and recommend that the City Council find, based on their independent judgement, after consideration of the whole of the administrative record, including the SCAG 2016-2040 RTP/ SCS PEIR (SCH No. 2015031035), certified on April 7, 2016 (EIR) and the Addendum prepared for the PSH Ordinance (Addendum), the project was assessed in the EIR and pursuant to the CEQA Guidelines, Sections 15162 and 15164 and the Addendum that no major revisions to the EIR are required and no subsequent EIR, or negative declaration is required for approval of the project;
3. Approve and recommend that the City Council adopt the proposed ordinance;
4. Adopt the Staff Report as the Commission Report on the subject; and
5. Adopt the Findings.

Applicant: City of Los Angeles

Staff: Cally Hardy, Planning Assistant
cally.hardy@lacity.org
(213) 978-1643

13. [CPC-2017-3409-CA](#)
CEQA: ENV-2017-4476-CE,
ENV-2017-3410-ND
Plan Areas: All

Council Districts: All
Last Day to Act: N/A

PUBLIC HEARINGS – Completed September 25, 2017 and September 28, 2017

PROJECT AREA: Citywide

PROPOSED ORDINANCE:

An ordinance amending Sections 12.03, 14.00 and 151.02 of the Los Angeles Municipal Code establishing regulations to facilitate the use of existing hotels and motels for Supportive Housing and/or Transitional Housing.

RECOMMENDED ACTIONS:

1. Determine, based on the whole of the administrative record, that the proposed ordinance is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15301, and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines Section 15300.2 applies;
2. Approve and recommend that the City Council find, pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including the Negative Declaration, No. ENV-2017-3410-ND (“Negative Declaration”), and all comments received, there is no substantial evidence that the project will have a significant effect on the environment; find the Negative Declaration reflects the independent judgment and analysis of the City; and adopt the Negative Declaration;
3. Approve and recommend that the City Council adopt the proposed ordinance;
4. Adopt the Staff Report as the Commission Report on the subject; and
5. Adopt the Findings.

Applicant: City of Los Angeles

Staff: Cally Hardy, Planning Assistant
cally.hardy@lacity.org
(213) 978-1643

14. [CPC-2017-4546-CA](#)
CEQA: ENV-2017-3361-SE
Plan Areas: All

Council Districts: All
Last Day to Act: N/A

PUBLIC HEARING REQUIRED

PROJECT AREA: Citywide

PROPOSED ORDINANCE:

An ordinance enacting restrictions on commercial advertising of cannabis, cannabis products, commercial cannabis activity, or businesses engaged in any commercial cannabis activity on signs.

RECOMMENDED ACTIONS:

1. Determine that based on the whole of the administrative record, the project is exempt from CEQA pursuant to California Business and Professions Code Section 26055(h) on the basis that the project will adopt ordinances, rules and/or regulations that will require discretionary review under CEQA to approve licenses to engage in commercial cannabis activity in the City of Los Angeles;
2. Approve and Recommend that the City Council adopt the proposed Ordinance;

3. Adopt the Staff Report as the Commission's Report on the subject; and
4. Adopt the Findings.

Applicant: City of Los Angeles

Staff: Niall Huffman, City Planning Associate
niall.huffman@lacity.org
(213) 978-3405

The next scheduled regular meeting of the City Planning Commission will be held on:

Thursday, December 21, 2017

Van Nuys City Hall
Council Chamber, 2nd Floor
14410 Sylvan Street
Van Nuys, CA 91401

An Equal Employment Opportunity/Affirmative Action Employer

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate. The meeting facility and its parking are wheelchair accessible. Translation services, sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services must be requested **7 days prior to the meeting** by calling the Planning Commission Secretariat at (213) 978-1300 or by email at CPC@lacity.org.

Attachments To The
Channel Law Comments On The Environmental Documentation For, And The,
Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And
Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd
(APN 4238-024-900 To 911)
December 20, 2017

Attachment 3
City of Los Angeles Parcel Profile Reports (ZIMAS Reports) For Two
Parcels In the Coastal Zone.



City of Los Angeles Department of City Planning

12/18/2017 PARCEL PROFILE REPORT

PROPERTY ADDRESSES

125 E VENICE BLVD
125 E SOUTH VENICE BLVD

ZIP CODES

90291

RECENT ACTIVITY

DIR-2008-4703-DI

CASE NUMBERS

CPC-2014-1456-SP
CPC-2005-8252-CA
CPC-2000-4046-CA
CPC-1998-119
CPC-1995-148-GPC-ZC
CPC-1987-648-ICO
CPC-1986-824-GPC
CPC-1984-226-SP
CPC-1972-24385
CPC-17630
ORD-175694
ORD-175693
ORD-172897
ORD-172019
ORD-170998-SA10
ORD-168999
ORD-164844-SA2190
ORD-145252
ORD-130336
DIR-2014-2824-DI
ZA-1992-484-PAD
ENV-2014-1458-EIR
ENV-2005-8253-ND
ENV-2004-2691-CE
ENV-2002-6836-SP
ENV-2001-846-ND
ED-73-307-ZC
AFF-36536

Address/Legal Information

PIN Number	106-5A145 436
Lot/Parcel Area (Calculated)	1,337.0 (sq ft)
Thomas Brothers Grid	PAGE 671 - GRID H6
Assessor Parcel No. (APN)	4238024900
Tract	SHORT LINE BEACH SUBDIVISION NO. 1
Map Reference	M B 2-59
Block	9
Lot	36
Arb (Lot Cut Reference)	1
Map Sheet	106-5A145

Jurisdictional Information

Community Plan Area	Venice
Area Planning Commission	West Los Angeles
Neighborhood Council	Venice
Council District	CD 11 - Mike Bonin
Census Tract #	2739.02
LADBS District Office	West Los Angeles

Planning and Zoning Information

Special Notes	None
Zoning	OS-1XL-O
	ZI-2471 Coastal Zone
	ZI-2452 Transit Priority Area in the City of Los Angeles
	ZI-2406 Director's Interpretation of the Venice SP for Small Lot Subdivisio
General Plan Land Use	Open Space
General Plan Note(s)	Yes
Hillside Area (Zoning Code)	No
Specific Plan Area	Los Angeles Coastal Transportation Corridor
Subarea	None
Specific Plan Area	Venice Coastal Zone
Subarea	Venice Canals
Special Land Use / Zoning	None
Design Review Board	No
Historic Preservation Review	No
Historic Preservation Overlay Zone	None
Other Historic Designations	None
Other Historic Survey Information	None
Mills Act Contract	None
CDO: Community Design Overlay	None
CPIO: Community Plan Imp. Overlay	None
Subarea	None
CUGU: Clean Up-Green Up	None
NSO: Neighborhood Stabilization Overlay	No
POD: Pedestrian Oriented Districts	None
SN: Sign District	No
Streetscape	No
Adaptive Reuse Incentive Area	None

This report is subject to the terms and conditions as set forth on the website. For more details, please refer to the terms and conditions at zimas.lacity.org
(*) - APN Area is provided "as is" from the Los Angeles County's Public Works, Flood Control, Benefit Assessment.

Ellis Act Property	No
Rent Stabilization Ordinance (RSO)	No
Transit Oriented Communities (TOC)	Tier 1
CRA - Community Redevelopment Agency	None
Central City Parking	No
Downtown Parking	No
Building Line	None
500 Ft School Zone	No
500 Ft Park Zone	No

Assessor Information

Assessor Parcel No. (APN)	4238024900
APN Area (Co. Public Works)*	0.635 (ac)
Use Code	2700 - Commercial - Parking Lot (Commercial Use Property) - Lots - Patron or Employee - One Story
Assessed Land Val.	\$230,543
Assessed Improvement Val.	\$0
Last Owner Change	12/12/1960
Last Sale Amount	\$0
Tax Rate Area	67
Deed Ref No. (City Clerk)	1-792
Building 1	No data for building 1
Building 2	No data for building 2
Building 3	No data for building 3
Building 4	No data for building 4
Building 5	No data for building 5

Additional Information

Airport Hazard	None
Coastal Zone	Coastal Zone Commission Authority Dual Jurisdictional Coastal Zone
Farmland	Area Not Mapped
Urban Agriculture Incentive Zone	YES
Very High Fire Hazard Severity Zone	No
Fire District No. 1	No
Flood Zone	None
Watercourse	No
Hazardous Waste / Border Zone Properties	No
Methane Hazard Site	Methane Zone
High Wind Velocity Areas	No
Special Grading Area (BOE Basic Grid Map A-13372)	No
Oil Wells	None

Seismic Hazards

Active Fault Near-Source Zone	
Nearest Fault (Distance in km)	5.5738776
Nearest Fault (Name)	Santa Monica Fault
Region	Transverse Ranges and Los Angeles Basin
Fault Type	B
Slip Rate (mm/year)	1.00000000
Slip Geometry	Left Lateral - Reverse - Oblique
Slip Type	Moderately / Poorly Constrained
Down Dip Width (km)	13.00000000
Rupture Top	0.00000000
Rupture Bottom	13.00000000
Dip Angle (degrees)	-75.00000000
Maximum Magnitude	6.60000000

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Alquist-Priolo Fault Zone	No
Landslide	No
Liquefaction	Yes
Preliminary Fault Rupture Study Area	No
Tsunami Inundation Zone	Yes

Economic Development Areas

Business Improvement District	VENICE BEACH
Promise Zone	None
Renewal Community	No
Revitalization Zone	None
State Enterprise Zone	None
Targeted Neighborhood Initiative	None

Public Safety

Police Information

Bureau	West
Division / Station	Pacific
Reporting District	1441

Fire Information

Bureau	West
Batallion	4
District / Fire Station	63
Red Flag Restricted Parking	No

CASE SUMMARIES

Note: Information for case summaries is retrieved from the Planning Department's Plan Case Tracking System (PCTS) database.

Case Number:	CPC-2014-1456-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	SPECIFIC PLAN AMENDMENT
Case Number:	CPC-2005-8252-CA
Required Action(s):	CA-CODE AMENDMENT
Project Descriptions(s):	AN ORDINANCE ESTABLISHING PERMANENT REGULATIONS IMPLEMENTING THE MELLO ACT IN THE COASTAL ZONE.
Case Number:	CPC-2000-4046-CA
Required Action(s):	CA-CODE AMENDMENT
Project Descriptions(s):	
Case Number:	CPC-1998-119
Required Action(s):	Data Not Available
Project Descriptions(s):	
Case Number:	CPC-1995-148-GPC-ZC
Required Action(s):	GPC-GENERAL PLAN/ZONING CONSISTENCY (AB283) ZC-ZONE CHANGE
Project Descriptions(s):	Data Not Available
Case Number:	CPC-1987-648-ICO
Required Action(s):	ICO-INTERIM CONTROL ORDINANCE
Project Descriptions(s):	INTERIM CONTROL ORDINANCE FOR THE ENTIRE VENICE COASTAL ZONE WHICH WILL TEMPORARILY PERMIT ONLY BUILDING DEVELOPMENT WHICH IS IN CONFORMANCE WITH REGULATIONS SUBSTANTIALLY BASED ON THE CALIFORNIA COASTAL COMMISSIONS INTERPRETIVE GUIDELINES FOR THE AREA
Case Number:	CPC-1986-824-GPC
Required Action(s):	GPC-GENERAL PLAN/ZONING CONSISTENCY (AB283)
Project Descriptions(s):	
Case Number:	CPC-1984-226-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	Data Not Available
Case Number:	CPC-1972-24385
Required Action(s):	Data Not Available
Project Descriptions(s):	
Case Number:	DIR-2014-2824-DI
Required Action(s):	DI-DIRECTOR OF PLANNING INTERPRETATION
Project Descriptions(s):	DIRECTOR'S INTERPRETATION OF A SPECIFIC PLAN PURSUANT TO LAMC SECTION 11.5.7.H. THE INTERPRETATION SHALL ONLY BE APPLICABLE TO THE VENICE COASTAL SPECIFIC PLAN.
Case Number:	ZA-1992-484-PAD
Required Action(s):	PAD-PLAN APPROVAL ONLY FOR A DEEMED-TO-BE-APPROVED CU
Project Descriptions(s):	THE CITY PROPOSES TO MAINTAIN THE SITE AS A PUBLIC MUNICIPAL PARKING LOT.
Case Number:	ENV-2014-1458-EIR
Required Action(s):	EIR-ENVIRONMENTAL IMPACT REPORT
Project Descriptions(s):	ENVIRONMENTAL IMPACT REPORT
Case Number:	ENV-2005-8253-ND
Required Action(s):	ND-NEGATIVE DECLARATION
Project Descriptions(s):	AN ORDINANCE ESTABLISHING PERMANENT REGULATIONS IMPLEMENTING THE MELLO ACT IN THE COASTAL ZONE.
Case Number:	ENV-2004-2691-CE
Required Action(s):	CE-CATEGORICAL EXEMPTION
Project Descriptions(s):	SMALL LOT/TOWNHOME ORDINANCE
Case Number:	ENV-2002-6836-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	VENICE COASTAL SPECIFIC PLAN AMENDMENT prepared and adopted by the City Planning Dept. in accordance with the Coastal Act provisions and guidelines.
Case Number:	ENV-2001-846-ND
Required Action(s):	ND-NEGATIVE DECLARATION
Project Descriptions(s):	
Case Number:	ED-73-307-ZC

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(*) - APN Area is provided "as is" from the Los Angeles County's Public Works, Flood Control, Benefit Assessment.

Required Action(s): ZC-ZONE CHANGE

Project Descriptions(s): Data Not Available

DATA NOT AVAILABLE

CPC-17630

ORD-175694

ORD-175693

ORD-172897

ORD-172019

ORD-170998-SA10

ORD-168999

ORD-164844-SA2190

ORD-145252

ORD-130336

AFF-36536



Address: 125 E VENICE BLVD

Tract: SHORT LINE BEACH
SUBDIVISION NO. 1

Zoning: OS-1XL-O

APN: 4238024900

Block: 9

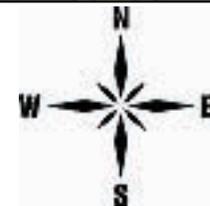
General Plan: Open Space

PIN #: 106-5A145 436

Lot: 36

Arb: 1

0.02 Miles
80 Feet



LEGEND

GENERALIZED ZONING

-  OS, GW
-  A, RA
-  RE, RS, R1, RU, RZ, RW1
-  R2, RD, RMP, RW2, R3, RAS, R4, R5
-  CR, C1, C1.5, C2, C4, C5, CW, ADP, LASED, CEC, USC, PVSP, PPSP
-  CM, MR, WC, CCS, UV, UI, UC, M1, M2, LAX, M3, SL
-  P, PB
-  PF

GENERAL PLAN LAND USE

LAND USE

RESIDENTIAL

-  Minimum Residential
-  Very Low / Very Low I Residential
-  Very Low II Residential
-  Low / Low I Residential
-  Low II Residential
-  Low Medium / Low Medium I Residential
-  Low Medium II Residential
-  Medium Residential
-  High Medium Residential
-  High Density Residential
-  Very High Medium Residential

COMMERCIAL

-  Limited Commercial
-  Limited Commercial - Mixed Medium Residential
-  Highway Oriented Commercial
-  Highway Oriented and Limited Commercial
-  Highway Oriented Commercial - Mixed Medium Residential
-  Neighborhood Office Commercial
-  Community Commercial
-  Community Commercial - Mixed High Residential
-  Regional Center Commercial

FRAMEWORK

COMMERCIAL

-  Neighborhood Commercial
-  General Commercial
-  Community Commercial
-  Regional Mixed Commercial

INDUSTRIAL

-  Commercial Manufacturing
-  Limited Manufacturing
-  Light Manufacturing
-  Heavy Manufacturing
-  Hybrid Industrial

PARKING

-  Parking Buffer

PORT OF LOS ANGELES

-  General / Bulk Cargo - Non Hazardous (Industrial / Commercial)
-  General / Bulk Cargo - Hazard
-  Commercial Fishing
-  Recreation and Commercial
-  Intermodal Container Transfer Facility Site

LOS ANGELES INTERNATIONAL AIRPORT

-  Airport Landside / Airport Landside Support
-  Airport Airside
-  LAX Airport Northside

OPEN SPACE / PUBLIC FACILITIES

-  Open Space
-  Public / Open Space
-  Public / Quasi-Public Open Space
-  Other Public Open Space
-  Public Facilities

INDUSTRIAL

-  Limited Industrial
-  Light Industrial

CIRCULATION

STREET

-  Arterial Mountain Road
-  Collector Scenic Street
-  Collector Street
-  Collector Street (Hillside)
-  Collector Street (Modified)
-  Collector Street (Proposed)
-  Country Road
-  Divided Major Highway II
-  Divided Secondary Scenic Highway
-  Local Scenic Road
-  Local Street
-  Major Highway (Modified)
-  Major Highway I
-  Major Highway II
-  Major Highway II (Modified)
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-  Major Scenic Highway II
-  Mountain Collector Street
-  Park Road
-  Parkway
-  Principal Major Highway
-  Private Street
-  Scenic Divided Major Highway II
-  Scenic Park
-  Scenic Parkway
-  Secondary Highway
-  Secondary Highway (Modified)
-  Secondary Scenic Highway
-  Special Collector Street
-  Super Major Highway

FREEWAYS

-  Freeway
-  Interchange
-  On-Ramp / Off-Ramp
-  Railroad
-  Scenic Freeway Highway

MISC. LINES

-  Airport Boundary
-  Bus Line
-  Coastal Zone Boundary
-  Coastline Boundary
-  Collector Scenic Street (Proposed)
-  Commercial Areas
-  Commercial Center
-  Community Redevelopment Project Area
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-  Desirable Open Space
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-  Horsekeeping Area
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-  Natural Resource Reserve
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-  Residential Planned Development
-  Scenic Highway (Obsolete)
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-  Site Boundary
-  Southern California Edison Power
-  Special Study Area
-  Specific Plan Area
-  Stagecoach Line
-  Wildlife Corridor

POINTS OF INTEREST

 Alternative Youth Hostel (Proposed)	 Horticultural Center	 Public Elementary School
 Animal Shelter	 Hospital	 Public Elementary School (Proposed)
 Area Library	 Hospital (Proposed)	 Public Golf Course
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 Campground	 e Important Ecological Area (Proposed)	 Public Housing (Proposed Expansion)
 Campground (Proposed)	 Interpretive Center (Proposed)	 JH Public Junior High School
 Cemetery	 JC Junior College	 JH Public Junior High School (Proposed)
 HW Church	 M MTA / Metrolink Station	 MS Public Middle School
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 CL Community Library (Proposed)	 MOB Municipal Office Building	 RCC Refuse Collection Center
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 CTC Community Transit Center	 NP Neighborhood Park (Proposed)	 RP Regional Park
 CH Convalescent Hospital	 OCC Oil Collection Center	 RP Regional Park (Proposed)
 CF Correctional Facility	 PE Parking Enforcement	 RPD Residential Plan Development
 CHS Cultural / Historic Site (Proposed)	 PHQ Police Headquarters	 SVS Scenic View Site
 CHS Cultural / Historical Site	 PS Police Station	 SVS Scenic View Site (Proposed)
 CAC Cultural Arts Center	 PS Police Station (Proposed Expansion)	 ADM School District Headquarters
 DMV DMV Office	 PS Police Station (Proposed)	 SC School Unspecified Loc/Type (Proposed)
 DWP DWP	 PTS Police Training site	 SC Skill Center
 DWP PS DWP Pumping Station	 PO Post Office	 SS Social Services
 EC Equestrian Center	 PO Post Office	 SF Special Feature
 FDH Fire Department Headquarters	 PDS Power Distribution Station	 SR Special Recreation (a)
 FS Fire Station	 PDS Power Distribution Station (Proposed)	 SSF Special School Facility
 FS Fire Station (Proposed Expansion)	 PRS Power Receiving Station	 SSF Special School Facility (Proposed)
 FS Fire Station (Proposed)	 PRS Power Receiving Station (Proposed)	 SP Steam Plant
 FSM Fire Supply & Maintenance	 C Private College	 SM Surface Mining
 FTS Fire Training Site	 E Private Elementary School	 TAA Trail & Assembly Area
 FBS Fireboat Station	 PG Private Golf Course	 TAA Trail & Assembly Area (Proposed)
 HCF Health Center / Medical Facility	 PG Private Golf Course (Proposed)	 UTYL Utility Yard
 HLI Helistop	 JH Private Junior High School	 WTR Water Tank Reservoir
 HM Historic Monument	 PS Private Pre-School	 WMC Wildlife Migration Corridor
 HCM Historical / Cultural Monument	 PRCF Private Recreation & Cultural Facility	 WPG Wildlife Preserve Gate
 HKA Horsekeeping Area	 SH Private Senior High School	
 HKA Horsekeeping Area (Proposed)	 SF Private Special School	
	 E Public Elementary (Proposed Expansion)	

SCHOOLS/PARKS WITH 500 FT. BUFFER

-  Existing School/Park Site
-  Planned School/Park Site
-  Inside 500 Ft. Buffer

- | | | |
|---|--|--|
|  Aquatic Facilities |  Other Facilities |  Opportunity School |
|  Beaches |  Park / Recreation Centers |  Charter School |
|  Child Care Centers |  Parks |  Elementary School |
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|  Horticulture/Gardens |  Senior Citizen Centers |  High School |
|  Skate Parks | |  Middle School |

TRANSIT ORIENTED COMMUNITIES (TOC)

- | | |
|--|--|
|  Tier 1 |  Tier 3 |
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-  Coastal Zone Commission Authority
-  Calvo Exclusion Area
-  Not in Coastal Zone
-  Dual Jurisdictional Coastal Zone

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-  Waiver of Dedication or Improvement (WDI)
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-  No vehicle dwelling anytime
-  No vehicle dwelling overnight between 9:00 PM - 6:00 AM. Must comply with all posted parking restrictions
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OTHER SYMBOLS

- | | | |
|---|---|--|
|  Lot Line |  Airport Hazard Zone |  Flood Zone |
|  Tract Line |  Census Tract |  Hazardous Waste |
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|  Easement |  Council District |  Hillside Grading |
|  Zone Boundary |  LADBS District Office |  Historic Preservation Overlay Zone |
|  Building Line |  Downtown Parking |  Specific Plan Area |
|  Lot Split |  Fault Zone |  Very High Fire Hazard Severity Zone |
|  Community Driveway |  Fire District No. 1 |  Oil Wells |
|  Lot Ties |  Tract Map | |
|  Building Outlines 2014 |  Parcel Map | |
|  Building Outlines 2008 | | |



City of Los Angeles Department of City Planning

12/18/2017 PARCEL PROFILE REPORT

PROPERTY ADDRESSES

200 E VENICE BLVD
200 E SOUTH VENICE BLVD

ZIP CODES

90291

RECENT ACTIVITY

DIR-2008-4703-DI
ENV-2008-1044

CASE NUMBERS

CPC-2014-1456-SP
CPC-2005-8252-CA
CPC-2000-4046-CA
CPC-1998-119
CPC-1987-648-ICO
CPC-1986-824-GPC
CPC-1984-226-SP
CPC-17630
ORD-175694
ORD-175693
ORD-172897
ORD-172019
ORD-168999
ORD-164844-SA3070
ORD-130336
DIR-2014-2824-DI
ZA-2008-1045-ZAA
ZA-1984-628-SM
ENV-2014-1458-EIR
ENV-2008-1044-CE
ENV-2005-8253-ND
ENV-2004-2691-CE
ENV-2002-6836-SP
ENV-2001-846-ND

Address/Legal Information

PIN Number	106-5A145 440
Lot/Parcel Area (Calculated)	2,991.8 (sq ft)
Thomas Brothers Grid	PAGE 671 - GRID H6
Assessor Parcel No. (APN)	4227003001
Tract	SHORT LINE BEACH SUBDIVISION NO. 1
Map Reference	M B 2-59
Block	13
Lot	1
Arb (Lot Cut Reference)	None
Map Sheet	106-5A145

Jurisdictional Information

Community Plan Area	Venice
Area Planning Commission	West Los Angeles
Neighborhood Council	Venice
Council District	CD 11 - Mike Bonin
Census Tract #	2739.02
LADBS District Office	West Los Angeles

Planning and Zoning Information

Special Notes	None
Zoning	R3-1-O
	ZI-2406 Director's Interpretation of the Venice SP for Small Lot Subdivisio
	ZI-2471 Coastal Zone
	ZI-2452 Transit Priority Area in the City of Los Angeles
General Plan Land Use	Medium Residential
General Plan Note(s)	Yes
Hillside Area (Zoning Code)	No
Specific Plan Area	Los Angeles Coastal Transportation Corridor
Subarea	None
Specific Plan Area	Venice Coastal Zone
Subarea	Venice Canals
Special Land Use / Zoning	None
Design Review Board	No
Historic Preservation Review	No
Historic Preservation Overlay Zone	None
Other Historic Designations	None
Other Historic Survey Information	None
Mills Act Contract	None
CDO: Community Design Overlay	None
CPIO: Community Plan Imp. Overlay	None
Subarea	None
CUGU: Clean Up-Green Up	None
NSO: Neighborhood Stabilization Overlay	No
POD: Pedestrian Oriented Districts	None
SN: Sign District	No
Streetscape	No
Adaptive Reuse Incentive Area	None

Rent Stabilization Ordinance (RSO)	No
Transit Oriented Communities (TOC)	Tier 1
CRA - Community Redevelopment Agency	None
Central City Parking	No
Downtown Parking	No
Building Line	None
500 Ft School Zone	No
500 Ft Park Zone	No

Assessor Information

Assessor Parcel No. (APN)	4227003001
APN Area (Co. Public Works)*	0.069 (ac)
Use Code	0101 - Residential - Single Family Residence - Pool
Assessed Land Val.	\$2,246,847
Assessed Improvement Val.	\$1,758,692
Last Owner Change	10/13/2015
Last Sale Amount	\$3,850,038
Tax Rate Area	67
Deed Ref No. (City Clerk)	996965
	996964
	67795
	409258
	2404751
	2404750
	1341496
	1289208
	1258991
Building 1	
Year Built	1987
Building Class	D10A
Number of Units	1
Number of Bedrooms	2
Number of Bathrooms	3
Building Square Footage	3,735.0 (sq ft)
Building 2	No data for building 2
Building 3	No data for building 3
Building 4	No data for building 4
Building 5	No data for building 5

Additional Information

Airport Hazard	None
Coastal Zone	Coastal Zone Commission Authority
	Dual Jurisdictional Coastal Zone
Farmland	Area Not Mapped
Urban Agriculture Incentive Zone	YES
Very High Fire Hazard Severity Zone	No
Fire District No. 1	No
Flood Zone	None
Watercourse	No
Hazardous Waste / Border Zone Properties	No
Methane Hazard Site	Methane Zone
High Wind Velocity Areas	No
Special Grading Area (BOE Basic Grid Map A-13372)	No
Oil Wells	None

Seismic Hazards

Nearest Fault (Distance in km)	5.58546
Nearest Fault (Name)	Santa Monica Fault
Region	Transverse Ranges and Los Angeles Basin
Fault Type	B
Slip Rate (mm/year)	1.00000000
Slip Geometry	Left Lateral - Reverse - Oblique
Slip Type	Moderately / Poorly Constrained
Down Dip Width (km)	13.00000000
Rupture Top	0.00000000
Rupture Bottom	13.00000000
Dip Angle (degrees)	-75.00000000
Maximum Magnitude	6.60000000
Alquist-Priolo Fault Zone	No
Landslide	No
Liquefaction	Yes
Preliminary Fault Rupture Study Area	No
Tsunami Inundation Zone	Yes

Economic Development Areas

Business Improvement District	None
Promise Zone	None
Renewal Community	No
Revitalization Zone	None
State Enterprise Zone	None
Targeted Neighborhood Initiative	None

Public Safety

Police Information

Bureau	West
Division / Station	Pacific
Reporting District	1441

Fire Information

Bureau	West
Batallion	4
District / Fire Station	63
Red Flag Restricted Parking	No

Note: Information for case summaries is retrieved from the Planning Department's Plan Case Tracking System (PCTS) database.

Case Number:	CPC-2014-1456-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	SPECIFIC PLAN AMENDMENT
Case Number:	CPC-2005-8252-CA
Required Action(s):	CA-CODE AMENDMENT
Project Descriptions(s):	AN ORDINANCE ESTABLISHING PERMANENT REGULATIONS IMPLEMENTING THE MELLO ACT IN THE COASTAL ZONE.
Case Number:	CPC-2000-4046-CA
Required Action(s):	CA-CODE AMENDMENT
Project Descriptions(s):	
Case Number:	CPC-1998-119
Required Action(s):	Data Not Available
Project Descriptions(s):	
Case Number:	CPC-1987-648-ICO
Required Action(s):	ICO-INTERIM CONTROL ORDINANCE
Project Descriptions(s):	INTERIM CONTROL ORDINANCE FOR THE ENTIRE VENICE COASTAL ZONE WHICH WILL TEMPORARILY PERMIT ONLY BUILDING DEVELOPMENT WHICH IS IN CONFORMANCE WITH REGULATIONS SUBSTANTIALLY BASED ON THE CALIFORNIA COASTAL COMMISSIONS INTERPRETIVE GUIDELINES FOR THE AREA
Case Number:	CPC-1986-824-GPC
Required Action(s):	GPC-GENERAL PLAN/ZONING CONSISTENCY (AB283)
Project Descriptions(s):	
Case Number:	CPC-1984-226-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	Data Not Available
Case Number:	DIR-2014-2824-DI
Required Action(s):	DI-DIRECTOR OF PLANNING INTERPRETATION
Project Descriptions(s):	DIRECTOR'S INTERPRETATION OF A SPECIFIC PLAN PURSUANT TO LAMC SECTION 11.5.7.H. THE INTERPRETATION SHALL ONLY BE APPLICABLE TO THE VENICE COASTAL SPECIFIC PLAN.
Case Number:	ZA-2008-1045-ZAA
Required Action(s):	ZAA-AREA, HEIGHT, YARD, AND BLDG LINE ADJMNTS GT 20% (SLIGHT MODIFICATIONS)
Project Descriptions(s):	AS PER 12.28 - ZONING ADMINISTRATOR'S ADJUSTMENT TO PERMIT A REDUCED FRONT YARD SETBACK OF 5' IN LIEU OF THE MINIMUM 15' REQUIRED (PER SECTION 12.10 C.1).
Case Number:	ZA-1984-628-SM
Required Action(s):	SM-SLIGHT MODIFICATIONS
Project Descriptions(s):	
Case Number:	ENV-2014-1458-EIR
Required Action(s):	EIR-ENVIRONMENTAL IMPACT REPORT
Project Descriptions(s):	ENVIRONMENTAL IMPACT REPORT
Case Number:	ENV-2008-1044-CE
Required Action(s):	CE-CATEGORICAL EXEMPTION
Project Descriptions(s):	AS PER 12.28 - ZONING ADMINISTRATOR'S ADJUSTMENT TO PERMIT A REDUCED FRONT YARD SETBACK OF 5' IN LIEU OF THE MINIMUM 15' REQUIRED (PER SECTION 12.10 C.1).
Case Number:	ENV-2005-8253-ND
Required Action(s):	ND-NEGATIVE DECLARATION
Project Descriptions(s):	AN ORDINANCE ESTABLISHING PERMANENT REGULATIONS IMPLEMENTING THE MELLO ACT IN THE COASTAL ZONE.
Case Number:	ENV-2004-2691-CE
Required Action(s):	CE-CATEGORICAL EXEMPTION
Project Descriptions(s):	SMALL LOT/TOWNHOME ORDINANCE
Case Number:	ENV-2002-6836-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	VENICE COASTAL SPECIFIC PLAN AMENDMENT prepared and adopted by the City Planning Dept. in accordance with the Coastal Act provisions and guidelines.
Case Number:	ENV-2001-846-ND
Required Action(s):	ND-NEGATIVE DECLARATION
Project Descriptions(s):	

DATA NOT AVAILABLE

CPC-17630

ORD-175694

ORD-175693

ORD-172897

ORD-172019

ORD-168999

ORD-164844-SA3070

ORD-130336

12/18/2017

Generalized Zoning

IMAS PUBLIC



Zoning: R3-1-O
General Plan: Medium Residential

Tract: SHORT LINE BEACH
SUBDIVISION NO. 1
Block: 13
Lot: 1
Arb: None

Address: 200 E VENICE BLVD
APN: 4227003001
N #: 106-5A145 440

LEGEND

GENERALIZED ZONING

-  OS, GW
-  A, RA
-  RE, RS, R1, RU, RZ, RW1
-  R2, RD, RMP, RW2, R3, RAS, R4, R5
-  CR, C1, C1.5, C2, C4, C5, CW, ADP, LASED, CEC, USC, PVSP, PPSP
-  CM, MR, WC, CCS, UV, UI, UC, M1, M2, LAX, M3, SL
-  P, PB
-  PF

GENERAL PLAN LAND USE

LAND USE

RESIDENTIAL

-  Minimum Residential
-  Very Low / Very Low I Residential
-  Very Low II Residential
-  Low / Low I Residential
-  Low II Residential
-  Low Medium / Low Medium I Residential
-  Low Medium II Residential
-  Medium Residential
-  High Medium Residential
-  High Density Residential
-  Very High Medium Residential

COMMERCIAL

-  Limited Commercial
-  Limited Commercial - Mixed Medium Residential
-  Highway Oriented Commercial
-  Highway Oriented and Limited Commercial
-  Highway Oriented Commercial - Mixed Medium Residential
-  Neighborhood Office Commercial
-  Community Commercial
-  Community Commercial - Mixed High Residential
-  Regional Center Commercial

FRAMEWORK

COMMERCIAL

-  Neighborhood Commercial
-  General Commercial
-  Community Commercial
-  Regional Mixed Commercial

INDUSTRIAL

-  Commercial Manufacturing
-  Limited Manufacturing
-  Light Manufacturing
-  Heavy Manufacturing
-  Hybrid Industrial

PARKING

-  Parking Buffer

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12/18/2017 PARCEL PROFILE REPORT

PROPERTY ADDRESSES

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3311 S THATCHER AVE
3321 S THATCHER AVE

ZIP CODES

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ORD-172019
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ORD-170155
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ENV-2004-2691-CE
ENV-2002-6836-SP
ENV-2001-846-ND
AFF-4831
CDP-1983-19

Address/Legal Information

PIN Number	105B149 535
Lot/Parcel Area (Calculated)	93,274.7 (sq ft)
Thomas Brothers Grid	PAGE 672 - GRID A6
Assessor Parcel No. (APN)	4229002901
Tract	RAFAEL AND ANDRES MACHADO TRACT
Map Reference	M R 84-33/34
Block	None
Lot	PT "UNNUMBERED LT"
Arb (Lot Cut Reference)	261
Map Sheet	105B149

Jurisdictional Information

Community Plan Area	Venice
Area Planning Commission	West Los Angeles
Neighborhood Council	Venice
Council District	CD 11 - Mike Bonin
Census Tract #	2741.00
LADBS District Office	West Los Angeles

Planning and Zoning Information

Special Notes	None
Zoning	[Q]PF-1XL
	ZI-2406 Director's Interpretation of the Venice SP for Small Lot Subdivisio
	ZI-2471 Coastal Zone
	ZI-2452 Transit Priority Area in the City of Los Angeles
General Plan Land Use	Public Facilities
General Plan Note(s)	Yes
Hillside Area (Zoning Code)	No
Specific Plan Area	Los Angeles Coastal Transportation Corridor
Subarea	None
Specific Plan Area	Oxford Triangle
Subarea	None
Specific Plan Area	Venice Coastal Zone
Subarea	Oxford Triangle
Special Land Use / Zoning	None
Design Review Board	No
Historic Preservation Review	No
Historic Preservation Overlay Zone	None
Other Historic Designations	None
Other Historic Survey Information	None
Mills Act Contract	None
CDO: Community Design Overlay	None
CPIO: Community Plan Imp. Overlay	None
Subarea	None
CUGU: Clean Up-Green Up	None
NSO: Neighborhood Stabilization Overlay	No
POD: Pedestrian Oriented Districts	None
SN: Sign District	No

Adaptive Reuse Incentive Area	None
Ellis Act Property	No
Rent Stabilization Ordinance (RSO)	No
Transit Oriented Communities (TOC)	Not Eligible
CRA - Community Redevelopment Agency	None
Central City Parking	No
Downtown Parking	No
Building Line	None
500 Ft School Zone	No
500 Ft Park Zone	No

Assessor Information

Assessor Parcel No. (APN)	4229002901
APN Area (Co. Public Works)*	2.110 (ac)
Use Code	8800 - Miscellaneous - Government Owned Property
Assessed Land Val.	\$176,888
Assessed Improvement Val.	\$0
Last Owner Change	00/00/1964
Last Sale Amount	\$0
Tax Rate Area	67
Deed Ref No. (City Clerk)	None
Building 1	No data for building 1
Building 2	No data for building 2
Building 3	No data for building 3
Building 4	No data for building 4
Building 5	No data for building 5

Additional Information

Airport Hazard	None
Coastal Zone	Calvo Exclusion Area Coastal Zone Commission Authority
Farmland	Area Not Mapped
Urban Agriculture Incentive Zone	YES
Very High Fire Hazard Severity Zone	No
Fire District No. 1	No
Flood Zone	None
Watercourse	No
Hazardous Waste / Border Zone Properties	No
Methane Hazard Site	Methane Zone
High Wind Velocity Areas	No
Special Grading Area (BOE Basic Grid Map A-13372)	No
Oil Wells	None

Seismic Hazards

Active Fault Near-Source Zone	
Nearest Fault (Distance in km)	6.2252352
Nearest Fault (Name)	Santa Monica Fault
Region	Transverse Ranges and Los Angeles Basin
Fault Type	B
Slip Rate (mm/year)	1.00000000
Slip Geometry	Left Lateral - Reverse - Oblique
Slip Type	Moderately / Poorly Constrained
Down Dip Width (km)	13.00000000
Rupture Top	0.00000000
Rupture Bottom	13.00000000
Dip Angle (degrees)	-75.00000000

Alquist-Priolo Fault Zone	No
Landslide	No
Liquefaction	Yes
Preliminary Fault Rupture Study Area	No
Tsunami Inundation Zone	Yes

Economic Development Areas

Business Improvement District	None
Promise Zone	None
Renewal Community	No
Revitalization Zone	None
State Enterprise Zone	None
Targeted Neighborhood Initiative	None

Public Safety

Police Information

Bureau	West
Division / Station	Pacific
Reporting District	1444

Fire Information

Bureau	West
Batallion	4
District / Fire Station	63
Red Flag Restricted Parking	No

Note: Information for case summaries is retrieved from the Planning Department's Plan Case Tracking System (PCTS) database.

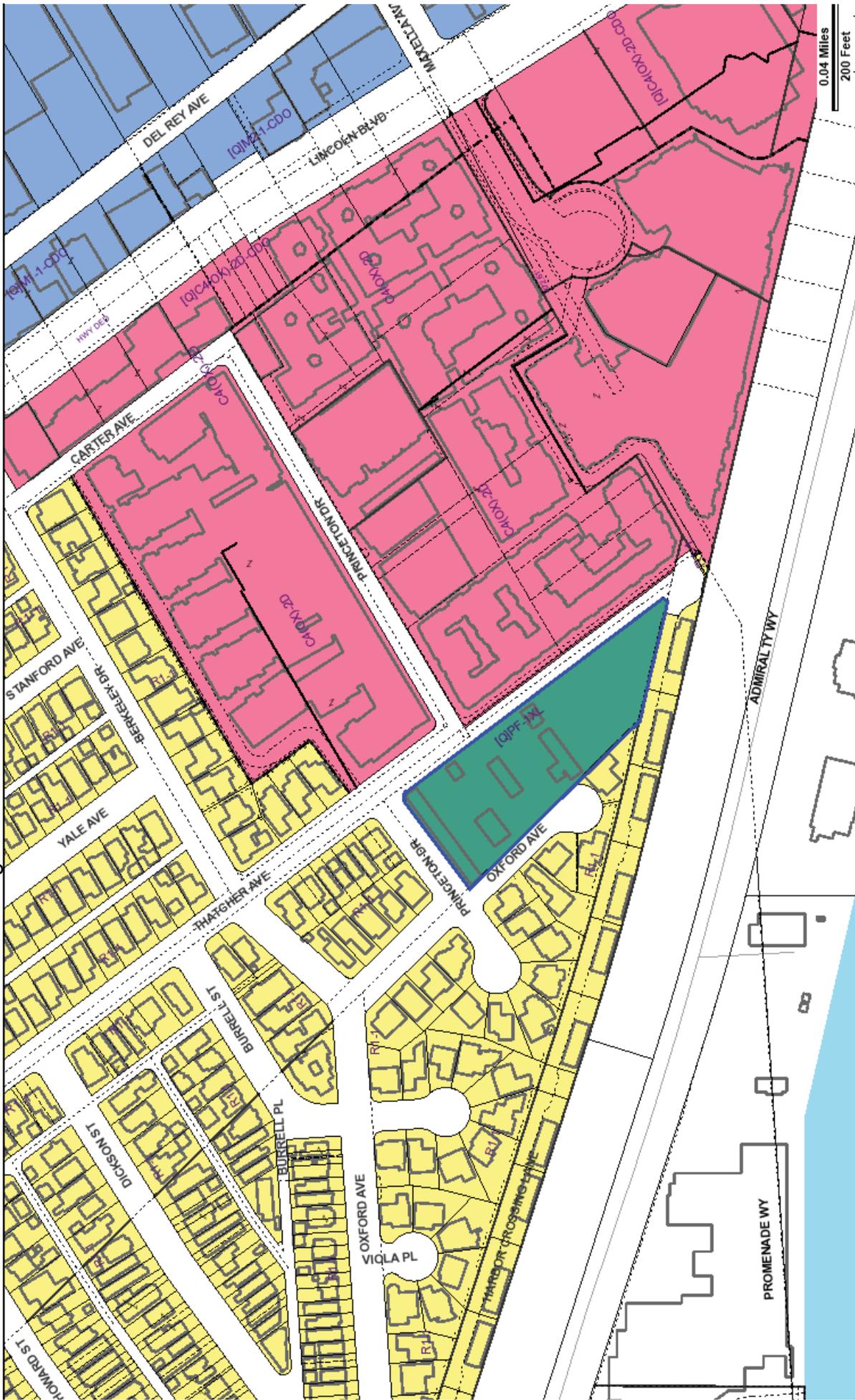
Case Number:	CPC-2014-1456-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	SPECIFIC PLAN AMENDMENT
Case Number:	CPC-2005-8252-CA
Required Action(s):	CA-CODE AMENDMENT
Project Descriptions(s):	AN ORDINANCE ESTABLISHING PERMANENT REGULATIONS IMPLEMENTING THE MELLO ACT IN THE COASTAL ZONE.
Case Number:	CPC-2000-4046-CA
Required Action(s):	CA-CODE AMENDMENT
Project Descriptions(s):	
Case Number:	CPC-1998-119
Required Action(s):	Data Not Available
Project Descriptions(s):	
Case Number:	CPC-1995-148-GPC-ZC
Required Action(s):	GPC-GENERAL PLAN/ZONING CONSISTENCY (AB283) ZC-ZONE CHANGE
Project Descriptions(s):	Data Not Available
Case Number:	CPC-1987-648-ICO
Required Action(s):	ICO-INTERIM CONTROL ORDINANCE
Project Descriptions(s):	INTERIM CONTROL ORDINANCE FOR THE ENTIRE VENICE COASTAL ZONE WHICH WILL TEMPORARILY PERMIT ONLY BUILDING DEVELOPMENT WHICH IS IN CONFORMANCE WITH REGULATIONS SUBSTANTIALLY BASED ON THE CALIFORNIA COASTAL COMMISSIONS INTERPRETIVE GUIDELINES FOR THE AREA
Case Number:	CPC-1984-226-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	Data Not Available
Case Number:	CPC-1963-14311
Required Action(s):	Data Not Available
Project Descriptions(s):	
Case Number:	CPC-1949-2836
Required Action(s):	Data Not Available
Project Descriptions(s):	
Case Number:	DIR-2014-2824-DI
Required Action(s):	DI-DIRECTOR OF PLANNING INTERPRETATION
Project Descriptions(s):	DIRECTOR'S INTERPRETATION OF A SPECIFIC PLAN PURSUANT TO LAMC SECTION 11.5.7.H. THE INTERPRETATION SHALL ONLY BE APPLICABLE TO THE VENICE COASTAL SPECIFIC PLAN.
Case Number:	ENV-2014-1458-EIR
Required Action(s):	EIR-ENVIRONMENTAL IMPACT REPORT
Project Descriptions(s):	ENVIRONMENTAL IMPACT REPORT
Case Number:	ENV-2005-8253-ND
Required Action(s):	ND-NEGATIVE DECLARATION
Project Descriptions(s):	AN ORDINANCE ESTABLISHING PERMANENT REGULATIONS IMPLEMENTING THE MELLO ACT IN THE COASTAL ZONE.
Case Number:	ENV-2004-2691-CE
Required Action(s):	CE-CATEGORICAL EXEMPTION
Project Descriptions(s):	SMALL LOT/TOWNHOME ORDINANCE
Case Number:	ENV-2002-6836-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	VENICE COASTAL SPECIFIC PLAN AMENDMENT prepared and adopted by the City Planning Dept. in accordance with the Coastal Act provisions and guidelines.
Case Number:	ENV-2001-846-ND
Required Action(s):	ND-NEGATIVE DECLARATION
Project Descriptions(s):	
Case Number:	CDP-1983-19
Required Action(s):	Data Not Available
Project Descriptions(s):	

ORD-175694
ORD-175693
ORD-172897
ORD-172019
ORD-170999-SA60
ORD-170155
ORD-168999
ORD-162509
AFF-4831

12/18/2017

Generalized Zoning

IMAS PUBLIC



Tract: RAFAEL AND ANDRES
MACHADO TRACT
Block: None
Lot: PT "UNNUMBERED LT"
Arb: 261

Address: 3233 S THATCHER AVE
Zoning: [QJPF-1XL
General Plan: Public Facilities

LEGEND

GENERALIZED ZONING

- OS, GW
- A, RA
- RE, RS, R1, RU, RZ, RW1
- R2, RD, RMP, RW2, R3, RAS, R4, R5
- CR, C1, C1.5, C2, C4, C5, CW, ADP, LASED, CEC, USC, PVSP, PPSP
- CM, MR, WC, CCS, UV, UI, UC, M1, M2, LAX, M3, SL
- P, PB
- PF

GENERAL PLAN LAND USE

LAND USE

RESIDENTIAL

- Minimum Residential
- Very Low / Very Low I Residential
- Very Low II Residential
- Low / Low I Residential
- Low II Residential
- Low Medium / Low Medium I Residential
- Low Medium II Residential
- Medium Residential
- High Medium Residential
- High Density Residential
- Very High Medium Residential

COMMERCIAL

- Limited Commercial
- Limited Commercial - Mixed Medium Residential
- Highway Oriented Commercial
- Highway Oriented and Limited Commercial
- Highway Oriented Commercial - Mixed Medium Residential
- Neighborhood Office Commercial
- Community Commercial
- Community Commercial - Mixed High Residential
- Regional Center Commercial

FRAMEWORK

COMMERCIAL

- Neighborhood Commercial
- General Commercial
- Community Commercial
- Regional Mixed Commercial

INDUSTRIAL

- Commercial Manufacturing
- Limited Manufacturing
- Light Manufacturing
- Heavy Manufacturing
- Hybrid Industrial

PARKING

- Parking Buffer

PORT OF LOS ANGELES

- General / Bulk Cargo - Non Hazardous (Industrial / Commercial)
- General / Bulk Cargo - Hazard
- Commercial Fishing
- Recreation and Commercial
- Intermodal Container Transfer Facility Site

LOS ANGELES INTERNATIONAL AIRPORT

- Airport Landside / Airport Landside Support
- Airport Airside
- LAX Airport Northside

OPEN SPACE / PUBLIC FACILITIES

- Open Space
- Public / Open Space
- Public / Quasi-Public Open Space
- Other Public Open Space
- Public Facilities

INDUSTRIAL

- Limited Industrial
- Light Industrial

CIRCULATION

STREET

-  Arterial Mountain Road
-  Collector Scenic Street
-  Collector Street
-  Collector Street (Hillside)
-  Collector Street (Modified)
-  Collector Street (Proposed)
-  Country Road
-  Divided Major Highway II
-  Divided Secondary Scenic Highway
-  Local Scenic Road
-  Local Street
-  Major Highway (Modified)
-  Major Highway I
-  Major Highway II
-  Major Highway II (Modified)

-  Major Scenic Highway
-  Major Scenic Highway (Modified)
-  Major Scenic Highway II
-  Mountain Collector Street
-  Park Road
-  Parkway
-  Principal Major Highway
-  Private Street
-  Scenic Divided Major Highway II
-  Scenic Park
-  Scenic Parkway
-  Secondary Highway
-  Secondary Highway (Modified)
-  Secondary Scenic Highway
-  Special Collector Street
-  Super Major Highway

FREEWAYS

-  Freeway
-  Interchange
-  On-Ramp / Off- Ramp
-  Railroad
-  Scenic Freeway Highway

MISC. LINES

-  Airport Boundary
-  Bus Line
-  Coastal Zone Boundary
-  Coastline Boundary
-  Collector Scenic Street (Proposed)
-  Commercial Areas
-  Commercial Center
-  Community Redevelopment Project Area
-  Country Road
-  DWP Power Lines
-  Desirable Open Space
-  Detached Single Family House
-  Endangered Ridgeline
-  Equestrian and/or Hiking Trail
-  Hiking Trail
-  Historical Preservation
-  Horsekeeping Area
-  Local Street
-  MSA Desirable Open Space
-  Major Scenic Controls
-  Multi-Purpose Trail
-  Natural Resource Reserve
-  Park Road
-  Park Road (Proposed)
-  Quasi-Public
-  Rapid Transit Line
-  Residential Planned Development
-  Scenic Highway (Obsolete)
-  Secondary Scenic Controls
-  Secondary Scenic Highway (Proposed)
-  Site Boundary
-  Southern California Edison Power
-  Special Study Area
-  Specific Plan Area
-  Stagecoach Line
-  Wildlife Corridor

POINTS OF INTEREST

 Alternative Youth Hostel (Proposed)	 Horticultural Center	 Public Elementary School
 Animal Shelter	 Hospital	 Public Elementary School (Proposed)
 Area Library	 Hospital (Proposed)	 Public Golf Course
 Area Library (Proposed)	HW House of Worship	 Public Golf Course (Proposed)
 Bridge	 Important Ecological Area	 Public Housing
 Campground	 Important Ecological Area (Proposed)	 Public Housing (Proposed Expansion)
 Campground (Proposed)	 Interpretive Center (Proposed)	 Public Junior High School
 Cemetery	 Junior College	 Public Junior High School (Proposed)
HW Church	 MTA / Metrolink Station	 Public Middle School
 City Hall	 MTA Station	 Public Senior High School
 Community Center	 MTA Stop	 Public Senior High School (Proposed)
 Community Library	MWD MWD Headquarters	 Pumping Station
 Community Library (Proposed Expansion)	 Maintenance Yard	 Pumping Station (Proposed)
 Community Library (Proposed)	 Municipal Office Building	 Refuse Collection Center
 Community Park	 Municipal Parking lot	 Regional Library
 Community Park (Proposed Expansion)	 Neighborhood Park	 Regional Library (Proposed Expansion)
 Community Park (Proposed)	 Neighborhood Park (Proposed Expansion)	 Regional Library (Proposed)
 Community Transit Center	 Neighborhood Park (Proposed)	 Regional Park
 Convalescent Hospital	 Oil Collection Center	 Regional Park (Proposed)
 Correctional Facility	 Parking Enforcement	RPD Residential Plan Development
 Cultural / Historic Site (Proposed)	 Police Headquarters	 Scenic View Site
 Cultural / Historical Site	 Police Station	 Scenic View Site (Proposed)
 Cultural Arts Center	 Police Station (Proposed Expansion)	 School District Headquarters
DMV DMV Office	 Police Station (Proposed)	 School Unspecified Loc/Type (Proposed)
DWP DWP	 Police Training site	 Skill Center
 DWP Pumping Station	PO Post Office	SS Social Services
 Equestrian Center	 Power Distribution Station	 Special Feature
 Fire Department Headquarters	 Power Distribution Station (Proposed)	 Special Recreation (a)
 Fire Station	 Power Receiving Station	 Special School Facility
 Fire Station (Proposed Expansion)	 Power Receiving Station (Proposed)	 Special School Facility (Proposed)
 Fire Station (Proposed)	C Private College	 Steam Plant
 Fire Supply & Maintenance	E Private Elementary School	 Surface Mining
 Fire Training Site	 Private Golf Course	 Trail & Assembly Area
 Fireboat Station	 Private Golf Course (Proposed)	 Trail & Assembly Area (Proposed)
 Health Center / Medical Facility	JH Private Junior High School	UTL Utility Yard
 Helistop	PS Private Pre-School	 Water Tank Reservoir
 Historic Monument	 Private Recreation & Cultural Facility	 Wildlife Migration Corridor
 Historical / Cultural Monument	SH Private Senior High School	 Wildlife Preserve Gate
 Horsekeeping Area	SF Private Special School	
 Horsekeeping Area (Proposed)	 Public Elementary (Proposed Expansion)	

SCHOOLS/PARKS WITH 500 FT. BUFFER

-  Existing School/Park Site
-  Planned School/Park Site
-  Inside 500 Ft. Buffer

- | | | |
|---|--|--|
|  Aquatic Facilities |  Other Facilities |  Opportunity School |
|  Beaches |  Park / Recreation Centers |  Charter School |
|  Child Care Centers |  Parks |  Elementary School |
|  Golf Course |  Performing / Visual Arts Centers |  Span School |
|  Historic Sites |  Recreation Centers |  Special Education School |
|  Horticulture/Gardens |  Senior Citizen Centers |  High School |
|  Skate Parks | |  Middle School |

TRANSIT ORIENTED COMMUNITIES (TOC)

- | | |
|--|--|
|  Tier 1 |  Tier 3 |
|  Tier 2 |  Tier 4 |

Note: TOC Tier designation and map layers are for reference purposes only. Eligible projects shall demonstrate compliance with Tier eligibility standards prior to the issuance of any permits or approvals. As transit service changes, eligible TOC Incentive Areas will be updated.

COASTAL ZONE

-  Coastal Zone Commission Authority
-  Calvo Exclusion Area
-  Not in Coastal Zone
-  Dual Jurisdictional Coastal Zone

WAIVER OF DEDICATION OR IMPROVEMENT

-  Waiver of Dedication or Improvement (WDI)
-  Public Work Approval (PWA)

LAMC SECTION 85.02 (VEHICLE DWELLING)

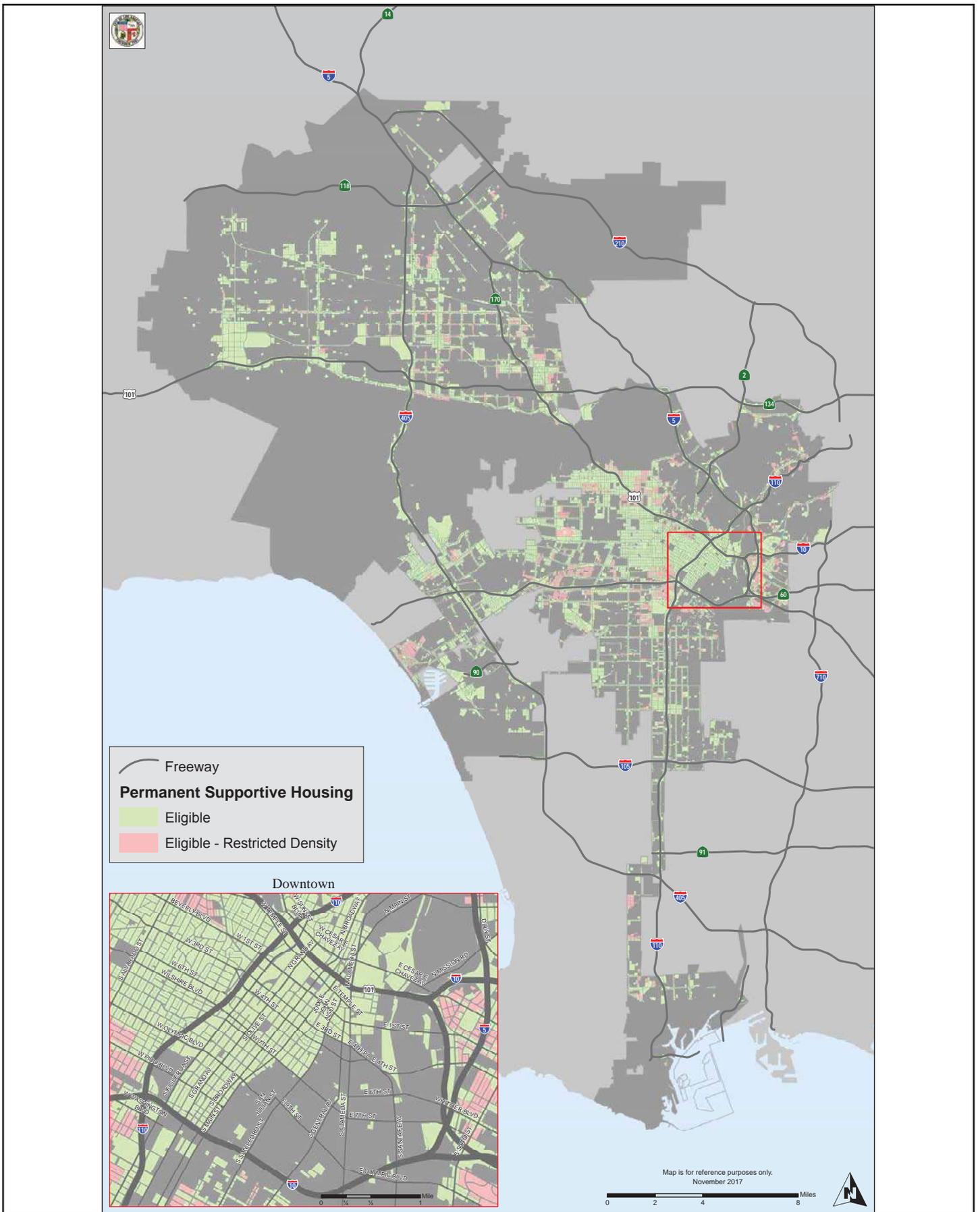
-  No vehicle dwelling anytime
-  No vehicle dwelling overnight between 9:00 PM - 6:00 AM. Must comply with all posted parking restrictions
-  Vehicle dwelling allowed. Must comply with all posted parking restrictions

OTHER SYMBOLS

- | | | |
|---|---|--|
|  Lot Line |  Airport Hazard Zone |  Flood Zone |
|  Tract Line |  Census Tract |  Hazardous Waste |
|  Lot Cut |  Coastal Zone |  High Wind Zone |
|  Easement |  Council District |  Hillside Grading |
|  Zone Boundary |  LADBS District Office |  Historic Preservation Overlay Zone |
|  Building Line |  Downtown Parking |  Specific Plan Area |
|  Lot Split |  Fault Zone |  Very High Fire Hazard Severity Zone |
|  Community Driveway |  Fire District No. 1 |  Oil Wells |
|  Lot Ties |  Tract Map | |
|  Building Outlines 2014 |  Parcel Map | |
|  Building Outlines 2008 | | |

Attachments To The
Channel Law Comments On The Environmental Documentation For, And The,
Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And
Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd
(APN 4238-024-900 To 911)
December 20, 2017

Attachment 4
Location of PSH Ordinance Eligible Parcels.



SOURCE: City of Los Angeles Department of City Planning, 2017

FIGURE 4

PSH Eligible Parcels

Attachments To The
Channel Law Comments On The Environmental Documentation For, And The,
Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And
Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd
(APN 4238-024-900 To 911)
December 20, 2017

Attachment 4
Notice of Intent to Adopt MND from City's Website



Search Classifieds for

In Category

Zip Code

Miles around

Example: "Brown Couch"

All Categories

90012

50 miles

Go

Place an Ad with the Los Angeles Times!

Browse Categories

▼ For Sale

- Antiques
- Arts & Crafts
- Auto Parts
- Baby & Kid Stuff
- Bicycles
- Boats
- Books & Magazines
- Building Supplies & Materials
- Business & Commercial
- CDs/DVDs/VHS
- Clothing & Accessories
- Collectibles
- Computers & Technology
- Electronics
- Furniture
- Games & Toys
- Health & Beauty
- Household Items
- Jewelry
- Motorcycles & Scooters
- Musical Instruments
- Outdoor & Garden
- Pets
- Powered by Gadzoo.com
- Photography & Video
- Recreational Vehicles
- Sporting Goods
- Tickets
- Tools
- Wanted to Buy
- Other

► Real Estate

► Services

► Announcements

► Events

Legal Notices: City Of

Legal Notices: CITY OF LOS ANGELES ENVIRONMENTAL NOTICES Notice is hereby given to the general public of the availability for public review and comment on the following Environmental documents. Please call Darlene Navarrete to review file: (213)978-1332. Files are available for REVIEW at: Los Angeles City Hall, 200 N. Spring St., Room 750, Los Angeles, CA 90012. Comments can be faxed to: (213)978-1343, or emailed to darlene.navarrete@lacity.org. (*unless otherwise noted). CD indicates the City Council District, sf indicates square feet and LAMC indicates Los Angeles Municipal Code. The publication is intended to serve as our Notice of Intent to adopt the following Mitigated Negative Declaration (MND) or Negative Declaration (ND) MITIGATED NEGATIVE DECLARATION-NG-17-138-PL: ENV-2017-1015. 15116-15216 S Vermont Ave & 747-761 W Redondo Beach Blvd; Harbor Gateway. CD15. The proposed project is the construction, use & maintenance of a new, 1-story (with mezzanine), 54-ft. tall, 466,402 sf warehouse/manufacturing/high-cube warehouse/distribution center with a total of 246 automobile parking spaces & 24 bicycle parking spaces. The proposed project requires Conditional Use Permits for a development which creates 250,000 sf or more of warehouse floor area & deviations from the Commercial Corner Development regulations; a Zoning Administrator's Adjustment to allow a 20% increase in the permitted building height; a Zoning Administrator's Determination to allow deviations from the Transitional Height provisions, and a Site Plan Review. REVIEW/COMMENT period ends: Jan. 2, 2018 NEGATIVE DECLARATION-NG-17-139-PL: ENV-2017-3410. Citywide zoning ordinance affecting all legally existing Hotels, Motels, Apartment Hotels, Transient Occupancy Residential Structures and Hostels located in the City of Los Angeles. CD's 1-15. The Proposed Interim Motel Conversion (IMC) Project is an ordinance (IMC Ordinance) that would amend Sections 12.03, 14.00 & 15.02 of the City of Los Angeles Municipal Code (LAMC) to establish regulations to facilitate the use of existing hotels & motels for Supportive Housing and/or Transitional Housing. The ordinance will remove regulatory barriers to allow for the temporary re-use of existing structures for residential purposes. The proposed amendment to LAMC Section 12.03 would formalize the definitions of Supportive Housing, Transitional Housing, and Supportive Services to reflect existing state law. The proposed amendments to LAMC Section 14.00 would change the approval process to allow existing residential structures such as Hotels, Motels, Apartment Hotels, Transient Occupancy Residential Structures & Hostels to conduct minor interior alterations & a temporary change of use to supportive housing and/or transitional housing. The supportive housing/transitional housing use is temporary, and is contingent upon the existence of a valid contract with a local public agency to provide that use; upon termination of any such contract, the Interim Motel Conversion Project would be required to revert to the previous legally existing use. Provisions are included in this section to ensure that the temporary change in use will not result in any increase in building footprint, the number of units, or the overall building height. The proposed amendments to LAMC Section 15.02 would amend the City's Rent Stabilization Ordinance to include an exemption for such projects, which are operating under the protection of a contract to provide the supportive housing and/or transitional housing use. REVIEW/COMMENT period ends: Dec. 20, 2017 MITIGATED NEGATIVE DECLARATION-NG-17-140-PL: ENV-2017-3137. Citywide zoning ordinance affecting all parcels in the City of Los Angeles zoned for multifamily residential use & located within High Quality Transit Areas (HQTA). Additionally, PSH development could occur on some parcels zoned Public Facilities (PF), and on some sites which are currently protected under the City's Residential Hotel Unit Conversion & Demolition Ordinance in LAMC Section 47.70 et seq. CD's 1-15. The Proposed Permanent Supportive Housing (PSH) Project is an ordinance (PSH Ordinance) that would amend the City of Los Angeles Municipal Code (LAMC) to facilitate development of PSH units. The purpose of this ordinance is to improve the process for the development of these units. The Proposed PSH Project would amend Sections 12.03, 12.04.09, 14.00 & 16.05 of the LAMC establishing regulations that define PSH & project eligibility criteria, establish unique development standards for PSH, and facilitate administrative review & approval, as well as modify certain provisions related to height & density. The Project also includes amendments to the Land Use element of the City's General Plan (consisting of 35 Community Plans) to allow PSH development to exceed any otherwise applicable minimum lot area per dwelling unit or guest room standards for the zone in which it is located. The PSH Ordinance would allow for projects to select up to 4 concessions with respect to the Zoning Code, including up to 20% decrease in required setbacks, up to 20% reduction in required open space, up to 20% increase in lot coverage limits, up to 35% increase in FAR and depending on the height district up to a 35% increase in height or one additional story. Additional design requirements include that when adjacent to or across an alley from an R2 or more restrictive zone, the building's transitional height shall be stepped-back within a 45-degree angle. REVIEW/COMMENT period ends: Dec. 20, 2017

Additional Information

Posted: 2 weeks, 5 days, 19 hours ago

Category: Public & Legal Notices

PUBLICATION OF ENVIRONMENTAL NOTICES

LOS ANGELES TIMES

THURSDAY, NOVEMBER 30, 2017

Notice is hereby given to the general public of the availability for public review and comment on the following Environmental documents. Please call Darlene Navarrete to review file: (213)978-1332. Files are available for REVIEW at: Los Angeles City Hall, 200 N. Spring St., Room 750, Los Angeles, CA 90012. Comments can be faxed to: (213)978-1343, or emailed to darlene.navarrete@lacity.org. (*unless otherwise noted). CD indicates the City Council District, sf indicates square feet and LAMC indicates Los Angeles Municipal Code. The publication is intended to serve as our Notice of Intent to adopt the following Mitigated Negative Declaration (MND) or Negative Declaration (ND)

MITIGATED NEGATIVE DECLARATION-NG-17-138-PL: [ENV-2017-1015](#). [ENV-2017-1015-A](#). [ENV-2017-1015-B](#). [ENV-2017-1015-C](#). [ENV-2017-1015-D](#). 15116-15216 S Vermont Ave & 747-761 W Redondo Beach Blvd; Harbor Gateway. CD15. The proposed project is the construction, use & maintenance of a new, 1-story (with mezzanine), 54-ft. tall, 466,402 sf warehouse/manufacturing/high-cube warehouse/distribution center with a total of 246 automobile parking spaces & 24 bicycle parking spaces. The proposed project requires Conditional Use Permits for a development which creates 250,000 sf or more of warehouse floor area & deviations from the Commercial Corner Development regulations; a Zoning Administrator's Adjustment to allow a 20% increase in the permitted building height; a Zoning Administrator's Determination to allow deviations from the Transitional Height provisions, and a Site Plan Review. REVIEW/COMMENT period ends: Jan. 2, 2018

NEGATIVE DECLARATION-NG-17-139-PL: [ENV-2017-3410](#). Citywide zoning ordinance affecting all legally existing Hotels, Motels, Apartment Hotels, Transient Occupancy Residential Structures and Hostels located in the City of Los Angeles. CD's 1-15. The Proposed Interim Motel Conversion (IMC) Project is an ordinance (IMC Ordinance) that would amend Sections 12.03, 14.00 & 151.02 of the City of Los Angeles Municipal Code (LAMC) to establish regulations to facilitate the use of existing hotels & motels for Supportive Housing and/or Transitional Housing. The ordinance will remove regulatory barriers to allow for the temporary re-use of existing structures for residential purposes. The proposed amendment to LAMC Section 12.03 would formalize the definitions of Supportive Housing, Transitional Housing, and Supportive Services to reflect existing state law. The proposed amendments to LAMC Section 14.00 would change the approval process to allow existing residential structures such as Hotels, Motels, Apartment Hotels, Transient Occupancy Residential Structures & Hostels to conduct minor interior alterations & a temporary change of use to supportive housing and/or transitional housing. The supportive housing/transitional housing use is temporary, and is contingent upon the existence of a valid contract with a local

public agency to provide that use; upon termination of any such contract, the Interim Motel Conversion Project would be required to revert to the previous legally existing use. Provisions are included in this section to ensure that the temporary change in use will not result in any increase in building footprint, the number of units, or the overall building height. The proposed amendments to LAMC Section 151.02 would amend the City's Rent Stabilization Ordinance to include an exemption for such projects, which are operating under the protection of a contract to provide the supportive housing and/or transitional housing use. REVIEW/COMMENT period ends: Dec. 20, 2017

MITIGATED NEGATIVE DECLARATION-NG-17-140-PL: [ENV-2017-3137](#). Citywide zoning ordinance affecting all parcels in the City of Los Angeles zoned for multifamily residential use & located within High Quality Transit Areas (HQTA). Additionally, PSH development could occur on some parcels zoned Public Facilities (PF), and on some sites which are currently protected under the City's Residential Hotel Unit Conversion & Demolition Ordinance in LAMC Section 47.70 et seq. CD's 1-15. The Proposed Permanent Supportive Housing (PSH) Project is an ordinance (PSH Ordinance) that would amend the City of Los Angeles Municipal Code (LAMC) to facilitate development of PSH units. The purpose of this ordinance is to improve the process for the development of these units. The Proposed PSH Project would amend Sections 12.03, 12.04.09, 14.00 & 16.05 of the LAMC establishing regulations that define PSH & project eligibility criteria, establish unique development standards for PSH, and facilitate administrative review & approval, as well as modify certain provisions related to height & density, consistent with State Density Bonus Law. The PSH Ordinance would allow for projects to select up to four concessions with respect to Zoning Code, including up to 20% decrease in required setbacks, up to 20% reduction in required open space, up to 20% increase in lot coverage limits, up to 35% increase in FAR and depending on the height district up to a 35% increase in height or one additional story. Additional design requirements include that when adjacent to or across an alley from an R2 or more restrictive zone, the building's transitional height shall be stepped-back within a 45-degree angle. REVIEW/COMMENT period ends: Dec. 20, 2017

Attachments To The
Channel Law Comments On The Environmental Documentation For, And The,
Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And
Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd
(APN 4238-024-900 To 911)
December 20, 2017

Attachment 6
CEQANet, State Clearinghouse Records for SCAG's RTP/SCS EIR



[OPR Home](#) > [CEQAnet Home](#) > [CEQAnet Query](#) > Search Results

Click Project Title link to display all related documents. Document Type link will display full document description.

Records Found: 8

[First] [Next] [Previous] [Last]

Page: 1

Query Parameters:

Date Range:

SCH#	Lead Agency	Project Title	Description	Document Type	Date Received
2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	The 2016 RTP/SCS Amendment #1 includes the inclusion and/or revision to 76 transportation projects, or approx. 2 percent of the total 2016 RTP/SCS projects. Changes include revisions to the project scope, cost and/or schedule to 54 projects already included in the 2016 RTP/SCS and inclusion of 22 new projects. The revisions and additions to the Project List will not result in substantial changes to the previously adopted 2016 RTP/SCS. (for further details, please refer to Page 4 "Project Description" in the ADD PEIR). An Addendum EIR was prepared since revisions would not result in new significant impacts or substantial increases to impacts.	NOD	7/11/2017
2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	Note: Review Per Lead The 2016 RTP/SCS Amendment #1 includes the inclusion and/or revision to 76 transportation projects, or approx. 2 percent of the total 2016 RTP/SCS projects. Changes include revisions to the project scope, cost and/or schedule to 54 projects already included in the 2016 RTP/SCS and inclusion of 22 new projects. The revisions and additions to the Project List will not result in substantial changes to the previously adopted 2016 RTP/SCS. (for further details, please refer to Page 4 "Project Description" in the ADD PEIR). An Addendum EIR was prepared since revisions would not result in new significant impacts or substantial increases to impacts.	ADM	7/10/2017
2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	The 2016 RTP/SCS Amendment #1 includes the inclusion and/or revision to 76 transportation projects, or approx. 2 percent of the total 2016 RTP/SCS projects. Changes include revisions to the project scope, cost and/or schedule to 54 projects already included in the 2016 RTP/SCS and inclusion of 22 new projects. The revisions and additions to the Project List will not result in substantial changes to the previously adopted 2016 RTP/SCS. (for further details, please refer to Page 4 "Project Description" in the ADD PEIR). An Addendum EIR was prepared since revisions would not result in new significant impacts or substantial increases to impacts.	ADM	4/10/2017
2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	The 2016 RTP/SCS Amendment #1 includes the inclusion and/or revision to 76 transportation projects, or approx. 2 percent of the total 2016 RTP/SCS projects. Changes include revisions to the project scope, cost and/or schedule to 54 projects already included in the 2016 RTP/SCS and inclusion of 22 new projects. The revisions and additions to the Project List will not result in substantial changes to the previously adopted 2016 RTP/SCS. (for further details, please refer to Page 4 "Project Description" in the ADD PEIR). An Addendum EIR was prepared since revisions would not result in new significant impacts or substantial increases to impacts.	NOD	4/10/2017
2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	Note: FYI Final The 2016 RTP/SCS updates the last adopted 2012 RTP/SCS, last amended in Sept. 2014, by refining goals, objectives, and policies and list of projects, and extending the planning horizon to 2040. As with the 2012 RTP/SCS, the 2016 RTP/SCS is intended to continue the region's various	FIN	4/8/2016

strategies that improve the balance between land use and transportation and transit systems, both current and future.

2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	The 2016 RTP/SCS updates the last adopted 2012 RTP/SCS, last amended in Sept. 2014, by refining goals, objectives, and policies and list of projects, and extending the planning horizon to 2040. As with the 2012 RTP/SCS, the 2016 RTP/SCS is intended to continue the region's various strategies that improve the balance between land use and transportation and transit systems, both current and future.	Oth	4/8/2016
2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	Note: Extended Review per lead. The 2016 RTP/SCS updates the last adopted 2012 RTP/SCS, last amended in Sept. 2014, by refining goals, objectives, and policies and list of projects, and extending the planning horizon to 2040. As with the 2012 RTP/SCS, the 2016 RTP/SCS is intended to continue the region's various strategies that improve the balance between land use and transportation and transit systems, both current and future.	EIR	12/4/2015
2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	The 2016 RTP/SCS updates the last adopted 2012 RTP/SCS, last amended in Sept. 2014, by refining goals, objectives, and policies and list of projects, and extending the planning horizon to 2040. As with the 2012 RTP/SCS, the 2016 RTP/SCS is intended to continue the region's various strategies that improve the balance between land use and transportation and transit systems, both current and future.	NOP	3/9/2015

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Addendum #2 to the 2016-2040 RTP/SCS

SCH Number: 2015031035

Document Type: EIR - Draft EIR

Project Lead Agency: Southern California Association of Governments

Project Description

Note: Extended Review per lead. The 2016 RTP/SCS updates the last adopted 2012 RTP/SCS, last amended in Sept. 2014, by refining goals, objectives, and policies and list of projects, and extending the planning horizon to 2040. As with the 2012 RTP/SCS, the 2016 RTP/SCS is intended to continue the region's various strategies that improve the balance between land use and transportation and transit systems, both current and future.

Contact Information

Primary Contact:

Ms. Lijin Sun
Southern California Association of Governments
213-236-1882
818 W. 7th Street; 12th Floor
Los Angeles, CA 90017-3435

Project Location

County: Los Angeles
City: Los Angeles, City of
Region:
Cross Streets:
Latitude/Longitude:
Parcel No:
Township:
Range:
Section:
Base:
Other Location Info: six-county area

Proximity To

Highways:
Airports:
Railways:
Waterways:
Schools:
Land Use:

Development Type

Power: Hydroelectric

Local Action

Project Issues

Agricultural Land, Air Quality, Archaeologic-Historic, Biological Resources, Coastal Zone, Drainage/Absorption, Economics/Jobs, Fiscal Impacts, Flood Plain/Flooding, Forest Land/Fire Hazard, Geologic/Seismic, Minerals, Noise, Population/Housing Balance, Public Services, Recreation/Parks, Schools/Universities, Sewer Capacity, Soil Erosion/Compaction/Grading, Solid Waste, Toxic/Hazardous, Traffic/Circulation, Vegetation, Water Quality, Wetland/Riparian, Water Supply, Growth Inducing, Landuse, Cumulative Effects, Aesthetic/Visual

Reviewing Agencies (Agencies in **Bold Type** submitted comment letters to the State Clearinghouse)

Resources Agency; California Coastal Commission; Coachella Valley Mountains Conservancy; **Department of Fish and Wildlife, Headquarters**; Cal Fire; Office of Emergency Services, California; California Highway Patrol; Caltrans, Division of Transportation Planning; Air Resources Board, Transportation Projects; State Water Resources Control Board, Division of Water Quality; Regional Water Quality Control Board, Region 4; Regional Water Quality Control Bd., Region 6 (Victorville); **Regional Water Quality Control Bd., Region 6 (So Lake Tahoe)**; Regional Water Quality Control Board, Region 7; Regional Water Quality Control Board, Region 8; Regional Water Quality Control Board, Region 9; Native American Heritage Commission; Public Utilities Commission

Date Received: 12/4/2015 **Start of Review:** 12/4/2015 **End of Review:** 2/1/2016

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Addendum #2 to the 2016-2040 RTP/SCS

SCH Number: 2015031035

Document Type: ADM - Addendum

Alternate Title: 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS)

Project Lead Agency: Southern California Association of Governments

Project Description

Note: Review Per Lead The 2016 RTP/SCS Amendment #1 includes the inclusion and/or revision to 76 transportation projects, or approx. 2 percent of the total 2016 RTP/SCS projects. Changes include revisions to the project scope, cost and/or schedule to 54 projects already included in the 2016 RTP/SCS and inclusion of 22 new projects. The revisions and additions to the Project List will not result in substantial changes to the previously adopted 2016 RTP/SCS. (for further details, please refer to Page 4 "Project Description" in the ADD PEIR). An Addendum EIR was prepared since revisions would not result in new significant impacts or substantial increases to impacts.

Contact Information

Primary Contact:

Ping Chang
Southern California Association of Governments
213-236-1839
818 W. 7th Street; 12th Floor
Los Angeles, CA 90017-3435

Project Location

County: Los Angeles
City:
Region:
Cross Streets:
Latitude/Longitude:
Parcel No:
Township:
Range:
Section:
Base:
Other Location Info: six-county area

Proximity To

Highways:
Airports:
Railways:
Waterways:
Schools:
Land Use:

Development Type

Other (2016 RTP/SCS)

Local Action

Project Issues

Coastal Zone, Drainage/Absorption, Economics/Jobs, Fiscal Impacts, Flood Plain/Flooding, Forest Land/Fire Hazard, Geologic/Seismic, Minerals, Noise, Population/Housing Balance, Public Services, Recreation/Parks, Schools/Universities, Sewer Capacity, Soil Erosion/Compaction/Grading, Solid Waste, Toxic/Hazardous, Traffic/Circulation, Vegetation, Water Quality, Wetland/Riparian, Water Supply, Growth Inducing, Landuse, Cumulative Effects, Aesthetic/Visual, Agricultural Land, Septic System, Air Quality, Archaeologic-Historic

Reviewing Agencies (Agencies in **Bold Type** submitted comment letters to the State Clearinghouse)

Resources Agency; Department of Fish and Wildlife, Headquarters; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, Division of Transportation Planning; Native American Heritage Commission; Public Utilities Commission; Regional Water Quality Control Board, Region 4; Regional Water Quality Control Bd., Region 6 (Victorville); Regional Water Quality Control Board, Region 7; Regional Water Quality Control Board, Region 8; Regional Water Quality Control Board, Region 9; Air Resources Board, Transportation Projects

Date Received: 7/10/2017 **Start of Review:** 7/10/2017 **End of Review:** 8/24/2017

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Appendices – Channel Law Letter

February 12, 2018

Comments On The Environmental Documentation For, And The, Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd (APN 4238-024-900 To 911)

APPENDIX B

**Minutes From Planning Commission Meeting from December 14, 2017
through February 8, 2018.**

**LOS ANGELES CITY PLANNING COMMISSION
OFFICIAL MINUTES
THURSDAY, DECEMBER 14, 2017**

CITY HALL COUNCIL CHAMBER
200 NORTH SPRING STREET, ROOM 340
LOS ANGELES CALIFORNIA 90012

THESE MINUTES OF THE LOS ANGELES CITY PLANNING COMMISSION ARE REPORTED IN ACTION FORMAT. COMPLETE DETAILS, INCLUDING THE DISCUSSION, RELATING TO EACH ITEM ARE CONTAINED IN THE AUDIO RECORDING FOR THIS MEETING. RECORDINGS ARE ACCESSIBLE ON THE INTERNET AT <http://planning.lacity.org>. OR MAY BE REQUESTED BY CONTACTING CENTRAL PUBLICATIONS AT (213) 978-1255.

Commission President David Ambroz called the regular meeting to order at 8:34 a.m. with Commission Vice President Renee Dake Wilson and Commissioners Vahid Khorsand, Samantha Millman, Marc Mitchell, Veronica Padilla-Campos and Dana Perlman in attendance. Commissioner Caroline Choe arrived at approximately 8:41 a.m.

Commissioner John Mack was absent.

Also in attendance were Vincent Bertoni, Director of Planning, Kevin Keller, Executive Officer, Lisa Webber, Deputy Planning Director and Donna Wong, Deputy City Attorney. Commission Office staff present were James K. Williams, Commission Executive Assistant II, Cecilia Lamas, Senior Administrative Clerk and Rocky Wiles, Commission Office Manager.

ITEM NO. 1

Planning Director Vince Bertoni introduced Tom Rothmann, Principal Planner and Phyllis Nathanson, Senior City Planner who gave an update on the sign ordinance.

Deputy City Attorney, Donna Wong had no report.

ITEM NO. 2

COMMISSION BUSINESS:

- Advance Calendar: There were no changes to the advanced calendar
- Commission Requests: Commissioner Khorsand requested information on using TAP cards as a mitigation measure to encourage public transit.
- Minutes of Meeting: Commissioner Perlman moved to approve the Minutes of November 9, 2017. The action was seconded by Commissioner Millman and the vote proceeded as follows:

Moved: Perlman
Seconded: Millman
Ayes: Ambroz, Khorsand, Padilla-Campos, Dake Wilson
Absent: Mack, Choe

Vote: 7 – 0

MOTION PASSED

ITEM NO. 3

NEIGHBORHOOD COUNCIL PRESENTATION:

There were two submissions by the Mid-City West Community Council on Item Nos. 8 and 9.

Commissioner Choe joined the meeting.

ITEM NO. 4

PUBLIC COMMENT:

No speakers requested to address the Commission.

ITEM NO. 5a

RECONSIDERATIONS

There were no requests for reconsideration.

President Ambroz took Item No. 10 out of order.

ITEM NO. 10

[CPC-2016-3608-GPA-ZC-HD-MCUP-CU-SPR](#)

CEQA: ENV-2016-3609-MND

Plan Area: Wilshire

Related Case: VTT-74511

Council District: 10 – Wesson

Last Day to Act: 01-12-18

PUBLIC HEARING – Completed November 8, 2017

PROJECT SITE: 800 South Western Avenue;
800 - 824 South Western Avenue;
3564 - 3566 West 8th Street;
3550, 3558, 3560 West 8th Street;
801 South Oxford Avenue

ADD AREA: 801 – 874 South Western Avenue;
855 South Manhattan Place

IN ATTENDANCE:

Kinikia Gardner, City Planner, Jane Choi, Senior City Planner and Shana Bonstin, Principal City Planner representing the Planning Department; Edgar Khalatian, Mayer Brown, LLP and Eric Olsen, TCA Architects, representing the applicant Western Plaza Capital Holding, LLC; Jordan Beroukhim, representing the Office of Council President Wesson.

MOTION:

Commissioner Dake Wilson put forth the actions below in conjunction with the approval of the following project with modifications as stated on the record by the Commission:

Demolition of the Eden Plaza building and the adaptive reuse and addition onto the existing 4-story IB Plaza Building, the construction use and maintenance of a new 12-story mixed-use building, and a new 3-story commercial building. The Project will include approximately 148 guest rooms (limited service hotel), 96 apartment units with 8 units set aside for Very Low Income Households, 58,343 square feet of commercial floor area with retail uses and restaurants with or without alcohol service and 241 vehicle parking spaces. The Project will include approximately 229,138 square feet of floor area, with a proposed floor area ratio (FAR) of 3.72:1. The amount of soils removed or exported would be approximately 20,000 cubic yards.

1. **Find**, based on the independent judgment of the decision-maker, after consideration of the whole of the administrative record, the project was assessed in Mitigated Negative Declaration, No. ENV-2016-3609-MND, adopted on November 13, 2017 (under Case No. VTT-74511) and reflected in the errata dated November 2, 2017 with mitigation measures and the Mitigation Monitoring Project prepared for the Mitigated Negative Declaration; and pursuant to CEQA Guidelines, Sections 15162 and 15164, no subsequent EIR, negative declaration, or addendum is required for approval of the project;
2. **Approve**, pursuant to Charter Section 555 and Section 11.5.6 of the Los Angeles Municipal Code (LAMC), a General Plan Amendment to the Wilshire Community Plan to amend Footnote 5.1 of the Community Plan's General Plan Land Use Map to apply to the property and the Add Area;
3. **Approve**, pursuant to LAMC Section 12.32 F, and **recommend** that the City Council adopt a Vesting Zone Change and Height District Change for the property from Height District No. 1 to Height District No. 2 to allow a Floor Area Ratio of 4:1 in lieu of 1.5:1;
4. **Approve**, pursuant to LAMC Section 12.22 A.25(g)(3), a Density Bonus setting aside eight (8) dwelling units for Very Low Income Households as Restricted Affordable Units for the following one (1) off-menu incentive:
 - (a) A reduction in one side yard to 2 feet 6 inches in lieu of the 15-foot side yard requirement as specified in LAMC Section 12.22.A.18(c)(2);
5. **Approve**, pursuant to LAMC Section 12.24 W.1, a Master Conditional Use for the sale or dispensing of a full line of alcoholic beverages for on-site consumption at six (6) restaurants on the premises;
6. **Approve**, pursuant to LAMC Section 12.24 W.24(a), a Conditional Use to permit a hotel located within 500 feet of an R-zoned property;
7. **Approve**, pursuant to LAMC Section 16.05, a Site Plan Review for a project with 96 dwelling units and 148 guest rooms;
8. **Adopt** the Conditions of Approval as modified by the Commission; and
9. **Adopt** the Findings.

The action was seconded by Commissioner Khorsand and the vote proceeded as follows:

Moved: Dake Wilson
 Seconded: Khorsand
 Ayes: Ambroz, Millman, Mitchell, Padilla-Campos
 Noes: Choe, Perlman
 Absent: Mack

Vote: 6 – 2

MOTION PASSED

President Ambroz recessed the meeting at 9:45 a.m. The meeting was reconvened at 9:52 a.m. with Commissioners Choe, Khorsand, Millman, Mitchell, Padilla-Campos, Perlman and Dake Wilson present.

ITEM NO. 6a

President Ambroz removed Item No. 6a from the consent calendar.

CPC-2014-4942-ZC-HD-DB-SPR

CEQA: ENV-2014-4943-MND

Plan Area: Wilshire

Council District: 1 - Cedillo

Last Day to Act: 12-19-17

PUBLIC HEARING – Completed July 24, 2017

PROJECT SITE: 2501 – 2515 West Olympic Boulevard;
980 – 992 South Arapahoe Street;
981 South Hoover Street

IN ATTENDANCE:

Mindy Nguyen, City Planner, Jane Choi, Senior City Planner and Shana Bonstin, Principal City Planner representing the Planning Department; James Santa Maria, Santa Maria Group and Tom Michali, Architect, representing the applicant.

MOTION:

Commissioner Ambroz moved to continue the matter to the City Planning Commission Meeting of February 8, 2018. The action was seconded by Commissioner Choe and the vote proceeded as follows:

Moved: Ambroz
Seconded: Choe
Ayes: Khorsand, Millman, Mitchell, Padilla-Campos, Perlman, Dake Wilson
Absent: Mack

Vote: 8 – 0

MOTION PASSED

ITEM NO. 7

CPC-2016-3748-DB-CUB-VCU-SPR

CEQA: ENV-2016-3749-MND

Plan Area: Wilshire

Council District: 10 – Wesson

Last Day to Act: 12-14-17

Continued from: 11-09-17

PUBLIC HEARING – Completed August 2, 2017

PROJECT SITE: 631 South Vermont Avenue (621 – 643 South Vermont Avenue)

IN ATTENDANCE:

Jenna Monterrosa, City Planner, Nick Hendricks, Senior City Planner and Charlie Rausch, Interim Chief Zoning Administrator; Joel Miller, PSOMAS, and Francis Park, Park and Vallejos, representing the applicant.

MOTION:

Commissioner Dake Wilson put forth the actions below in conjunction with the approval of the following project with modifications as stated on the record by the Commission:

A 33-story mixed-use building, measuring up to 450 feet in height, containing a new hotel with up to 200 rooms, approximately 16,410 square feet of office floor area, approximately 28,490 square feet of retail/restaurant floor area, 28,384 square-feet of open space and amenities, and up to 250 residential condominium units including 22 very-low income units. A total of 483 vehicular parking spaces will be provided; of which 279 will service residential uses and 204 will service commercial uses. The project site is currently developed with a used car sales office and lot, restaurant, and surface parking lot that will be demolished in conjunction with the proposed project.

1. **Find**, pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including the Mitigated Negative Declaration, No. ENV-2016-3749-MND, (“Mitigated Negative Declaration”), and all comments received, with the imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; **find**, the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; **find**, the mitigation measures have been made enforceable conditions on the project; and **adopt** the Mitigated Negative Declaration and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;
2. **Approve**, pursuant to Los Angeles Municipal Code (LAMC) Section 12.22-A,25, a Density Bonus, for an approximately 28.6% density bonus and the provision of 11% Very Low Income affordable housing units with an Off-Menu Incentive for increased Floor Area Ratio (FAR) up to 12:1 to exceed the FAR otherwise allowed by Footnote No. 6 in the Wilshire Community Plan land use policy map;
3. **Approve**, pursuant to LAMC Section 12.24-W,1, a Conditional Use, for on-site sales and consumption of alcoholic beverages in conjunction with a hotel;
4. **Approve**, pursuant to LAMC Sections 12.24-W, 24 and 12.24-T, a Vesting Conditional Use, to permit a hotel use within 500 feet of a residential zone;
5. **Approve**, pursuant to LAMC Section 16.05, a Site Plan Review for the construction of 250 residential condominium units and 200 hotel guest rooms;
6. **Adopt** the Conditions of Approval as modified by the Commission; and
7. **Adopt** the Findings.

The action was seconded by Commissioner Choe and the vote proceeded as follows:

Moved: Dake Wilson
 Seconded: Choe
 Ayes: Khorsand, Millman, Mitchell, Padilla-Campos, Perlman, Dake Wilson
 Absent: Mack

Vote : 8 – 0

MOTION PASSED

ITEM NO. 8

CPC-2014-2906-TDR-SPR

CEQA: ENV-2014-2907-MND

Plan Area: Central City

Council District: 14 – Huizar

Last Day to Act: 12-14-17

PUBLIC HEARING – Completed January 26, 2017

PROJECT SITE: 601 South Main Street;
601 – 641 South Main Street;
108 – 114 West 6th Street

IN ATTENDANCE:

May Sirinopwongsagon, City Planner, Blake Lamb, Principal City Planner and Shana Bonstin, Principal City Planner, representing the Department; Kate Bartolo representing the applicant.

MOTION:

Commissioner Ambroz moved to continue the matter to the City Planning Commission Meeting of February 8, 2018. The motion was seconded by Commissioner Khorsand and the vote proceeded as follows:

Moved: Ambroz
Seconded: Khorsand
Ayes: Choe, Millman, Mitchell, Padilla-Campos, Perlman, Dake Wilson
Absent: Mack

Vote: 8 – 0**MOTION PASSED**

President Ambroz recessed the meeting at 12:11 p.m. The meeting was reconvened at 12:26 p.m. with Commissioners Dake Wilson, Choe, Khorsand, Millman, Mitchell, Padilla-Campos and Perlman present.

President Ambroz took Item No. 12 out of order.

Commissioner Mitchell left the meeting at 1:00 p.m.

ITEM NO. 12

CPC-2017-3136-CA

CEQA: ENV-2017-3137-MND

SCAG 2016-2040 RTP/SCS PEIR (SCH No. 2015031035)

Plan Areas: All

Council Districts: All

Last Day to Act: N/A

PUBLIC HEARING – Completed September 25, 2017 and September 28, 2017

PROJECT AREA: Citywide**IN ATTENDANCE:**

Cally Hardy, City Planning Assistant, Claire Bowin, Senior City Planner and Ken Bernstein, Principal City Planner representing the Planning Department.

MOTION:

Commissioner Ambroz put forth the actions below in conjunction with the approval of the following ordinance with modifications as stated on the record by the Commission:

An ordinance amending Sections 12.03, 12.04.09, 14.00, and 16.05 of the Los Angeles Municipal Code establishing regulations to facilitate the production of Permanent Supportive Housing.

1. **Find** pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including Mitigated Negative Declaration No. ENV-2017-3137-MND (Mitigated Negative Declaration), and all comments received, with imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; **find** that the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; **find** the mitigation measures have been made enforceable conditions on the project; and adopt the Mitigated Negative Declaration; and **adopt** the Mitigated Negative Declaration and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;
2. **Approve** and **recommend** that the City Council **find**, based on their independent judgement, after consideration of the whole of the administrative record, including the SCAG 2016-2040 RTP/SCS PEIR (SCH No. 2015031035), certified on April 7, 2016 (EIR) and the Addendum prepared for the PSH Ordinance (Addendum), the project was assessed in the EIR and pursuant to the CEQA Guidelines, Sections 15162 and 15164 and the Addendum that no major revisions to the EIR are required and no subsequent EIR, or negative declaration is required for approval of the project;
3. **Adopt** the staff report as the Commission report on the subject;
4. **Approve** and **recommend** that the City Council **adopt** the proposed ordinance, as amended by the Commission, subject to review by the City Attorney as to form and legality; and
5. **Adopt** and **recommend** that the City Council **adopt** the Findings.

The action was seconded by Commissioner Khorsand and the vote proceeded as follows:

Moved: Ambroz
 Seconded: Khorsand
 Ayes: Choe, Millman, Padilla-Campos, Perlman, Dake Wilson
 Absent: Mack, Mitchell

Vote: 7 – 0

MOTION PASSED

Commissioner Padilla-Campos left the meeting at 3:00 p.m.

President Ambroz recessed the meeting at 3:04 p.m. The meeting was reconvened at 3:12 p.m. with Commissioners Choe, Khorsand, Millman, Perlman and Dake Wilson present.

ITEM NO. 9
CPC-2014-2590-TDR-SPR

CEQA: ENV-2014-2591-MND

Plan Area: Central City

Related Case: VTT-72343-CN

Council District: 14 – Huizar

Last Day to Act: 12-14-17

PUBLIC HEARING – Completed April 27, 2017**PROJECT SITE:** 920 South Hill Street;
916 – 930 South Hill Street**IN ATTENDANCE:**

May Sirinopwongsagon, City Planner, Blake Lamb, Principal City Planner and Shana Bonstin, Principal City Planner, representing the Planning Department; Kate Bartolo representing the applicant.

MOTION:

Commissioner Dake Wilson moved to continue the matter to the City Planning Commission Meeting of December 21, 2017. The action was seconded by Commissioner Ambroz and the vote proceeded as follows:

Moved: Dake Wilson
 Second: Ambroz
 Ayes: Choe, Khorsand, Millman, Perlman
 Absent: Mack, Mitchell, Padilla-Campos

Vote: 6 – 0**MOTION PASSED**

ITEM NO. 11
CPC-2017-1103-DB

CEQA: ENV-2017-1104-CE

Plan Area: Northeast Los Angeles

Council District: 14 – Huizar

Last Day to Act: 12-19-17

PUBLIC HEARING – Completed September 19, 2017**PROJECT SITE:** 1332 West Colorado Boulevard**IN ATTENDANCE:**

Azeen Khanmalek, City Planning Associate representing the Planning Department; Heather Lee representing the applicant Imad Boukai, General Procurement.

MOTION:

Commissioner Dake Wilson moved to continue the matter to the City Planning Commission Meeting of January 11, 2018. The action was seconded by Commissioner Ambroz and the vote proceeded as follows:

Moved: Dake Wilson
 Seconded: Ambroz

Ayes: Choe, Khorsand, Millman, Perlman
 Absent: Mack, Mitchell, Padilla-Campos

Vote: 6 – 0

MOTION PASSED

Commissioner Choe left the meeting at approximately 3:15 p.m.

ITEM NO. 13

CPC-2017-3409-CA

CEQA: ENV-2017-4476-CE,
 ENV-2017-3410-ND

Plan Areas: All

Council Districts: All
 Last Day to Act: N/A

PUBLIC HEARING – Completed September 25, 2017 and September 28, 2017

PROJECT AREA: Citywide

IN ATTENDANCE:

Cally Hardy, City Planning Assistant, Matthew Glesne, City Planner, Claire Bowin, Senior City Planner and Ken Bernstein, Principal City Planner representing the Planning Department.

MOTION:

Commissioner Dake Wilson put forth the actions below in conjunction with the approval of the following ordinance:

An ordinance amending Sections 12.03, 14.00 and 151.02 of the Los Angeles Municipal Code establishing regulations to facilitate the use of existing hotels and motels for Supportive Housing and/or Transitional Housing.

1. **Determine**, based on the whole of the administrative record, that the proposed ordinance is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15301, and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines Section 15300.2 applies;
2. **Approve and recommend** that the City Council **find**, pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including the Negative Declaration, No. ENV-2017-3410-ND (“Negative Declaration”), and all comments received, there is no substantial evidence that the project will have a significant effect on the environment; find the Negative Declaration reflects the independent judgment and analysis of the City; and adopt the Negative Declaration;
3. **Approve and recommend** that the City Council adopt the proposed ordinance;
4. **Adopt** the Staff Report as the Commission Report on the subject; and
5. **Adopt** the Findings.

The action was seconded by Commissioner Millman and the vote proceeded as follows:

Moved: Dake Wilson
Seconded: Millman
Ayes: Ambroz, Khorsand, Perlman
Absent: Choe, Mack, Mitchell, Padilla-Campos

Vote: 5 – 0

MOTION PASSED

ITEM NO. 14

[CPC-2017-4546-CA](#)
CEQA: ENV-2017-3361-SE
Plan Areas: All

Council Districts: All
Last Day to Act: N/A

PUBLIC HEARING HELD

PROJECT AREA: Citywide

IN ATTENDANCE:

Niall Huffman, City Planning Associate, Phyllis Nathanson, Senior City Planner and Tom Rothmann, Principal City Planner representing the Planning Department; Kenneth Fong Deputy City Attorney, representing the City Attorney’s Office.

MOTION:

Commissioner Ambroz moved to continue the matter to the City Planning Commission Meeting of December 21, 2017. The action was seconded by Commissioner Khorsand and the vote proceeded as follows:

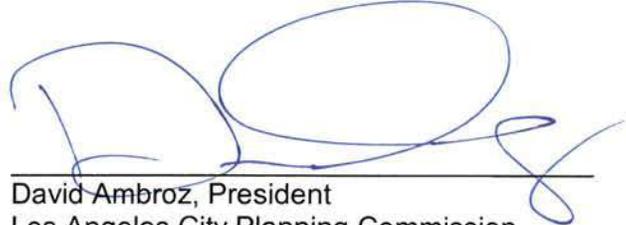
Moved: Ambroz
Seconded: Khorsand
Ayes: Millman
Noes: Perlman, Dake Wilson
Absent: Choe, Mack, Mitchell, Padilla-Campos

Vote: 3 – 2

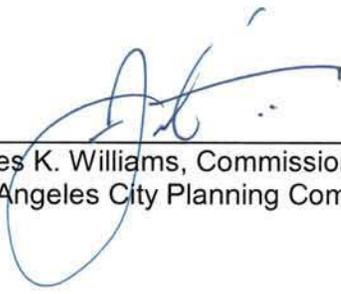
MOTION FAILED

Pursuant to Rule No. 8.5 of the City Planning Commission’s Rules and Operating Procedures, the matter is therefore continued to the next regular meeting of the Commission on December 21, 2017.

Commissioner Ambroz left the meeting at approximately 4:09 p.m. and quorum was lost. Commission Vice President Dake Wilson adjourned the meeting at 4:15 p.m.



David Ambroz, President
Los Angeles City Planning Commission



James K. Williams, Commission Executive Assistant II
Los Angeles City Planning Commission

ADOPTED
CITY OF LOS ANGELES
DEC 21 2017
CITY PLANNING DEPARTMENT
COMMISSION OFFICE

**LOS ANGELES CITY PLANNING COMMISSION
OFFICIAL MINUTES
THURSDAY, DECEMBER 21, 2017**

VAN NUYS CITY COUNCIL CHAMBERS
14410 SYLVAN STREET, 2ND FLOOR
VAN NUYS CALIFORNIA 91401

THESE MINUTES OF THE LOS ANGELES CITY PLANNING COMMISSION ARE REPORTED IN ACTION FORMAT. COMPLETE DETAILS, INCLUDING THE DISCUSSION, RELATING TO EACH ITEM ARE CONTAINED IN THE AUDIO RECORDING FOR THIS MEETING. RECORDINGS ARE ACCESSIBLE ON THE INTERNET AT <http://planning.lacity.org>. OR MAY BE REQUESTED BY CONTACTING CENTRAL PUBLICATIONS AT (213) 978-1255.

Commission President David Ambroz called the regular meeting to order at 8:34 a.m. with Commissioners Caroline Choe, Vahid Khorsand, Samantha Millman, Marc Mitchell, Veronica Padilla-Campos and Dana Perlman in attendance.

Commissioners John Mack and Renee Dake Wilson were absent.

Also in attendance were Vincent Bertoni, Director of Planning, Kevin Keller, Executive Officer, Lisa Webber, Deputy Planning Director and Amy Brothers, Deputy City Attorney. Commission Office staff present were James K. Williams, Commission Executive Assistant II, Cecilia Lamas, Senior Administrative Clerk and Rocky Wiles, Commission Office Manager.

ITEM NO. 1

DIRECTOR'S REPORT AND COMMISSION BUSINESS

- Planning Director Vince Bertoni gave no report.
- Legal actions and issues update: Deputy City Attorney, Amy Brothers had no report.
- Advance Calendar: There were no changes to the advanced calendar
- Commission Requests: There were no requests.
- Minutes of Meeting:
Commissioner Choe moved to approve the Minutes of November 16, 2017. The action was seconded by Commissioner Millman and the vote proceeded as follows:

Moved: Choe
Seconded: Millman
Ayes: Ambroz, Khorsand, Mitchell, Padilla-Campos, Perlman
Absent: Mack, Dake Wilson

Vote: 7 – 0

MOTION PASSED

- Commissioner Padilla Campos moved to approve the Minutes of December 14, 2017. The action was seconded by Commissioner Choe and the vote proceeded as follows:

Moved: Padilla-Campos
Seconded: Choe

Ayes: Ambroz, Khorsand, Millman, Mitchell, Perlman
Absent: Mack, Dake Wilson

Vote: 7 – 0

MOTION PASSED

ITEM NO. 2

NEIGHBORHOOD COUNCIL PRESENTATION:

There were no presentations by any Neighborhood Council representative or resolutions submitted to the Commission.

ITEM NO. 3

GENERAL PUBLIC COMMENT:

No speakers requested to address the Commission.

ITEM NO. 4a

RECONSIDERATIONS

There were no requests for reconsideration.

President Ambroz took Item No. 7 out of order.

ITEM NO. 7

[CPC-2017-4292-SP](#)

CEQA: ENV-1988-0026-SP-ZC-DA
Plan Area: Chatsworth-Porter Ranch

Council District: 12 – Englander
Last Day to Act: 12-21-17

PUBLIC HEARING HELD

PROJECT SITE: 19701 Rinaldi Street

IN ATTENDANCE:

Luciralia Ibarra, Senior City Planner and Charlie Rausch, Acting Chief Zoning Administrator representing the Planning Department; Tom Stemnock, Planning Associates, representing the applicant Porter Ranch Development Company.

MOTION:

Commissioner Khorsand put forth the actions below in conjunction with the approval of the following:

Amendment of the Porter Ranch Land Use/Transportation Specific Plan, Section 9.O.3, relating to the "Equestrian Staging Area", in order to be consistent with the recent amendment to the Porter Ranch Development Agreement, heard on September 28, 2017, where the City Planning Commission considered and recommended approval to the Porter Ranch Development Agreement, amending the language of Section V.a.2.o.iii. "Equestrian Staging Area" to read as follows: "permit the improvement of an equestrian staging area located within 1000 feet north or south of the 118 Freeway, between De Soto Avenue to the east and Topanga Canyon Boulevard to the west, at a location identified and provided by the City of Los Angeles, in consultation with the affected Council office(s)."

1. **Recommend** that the City Council **find**, based on the independent judgment of the decision-maker, after consideration of the whole of the administrative record, the project was assessed in EIR No. 88-0026(SP)(ZC)(DA) SCH No.88050420 certified on July 10, 1990; and pursuant to CEQA Guidelines 15162 and 15164, and as supported by Addendums dated April 2000, September 2000, October 2006;
2. **Approve** and **recommend** that the City Council **approve**, pursuant to 12.32-E, of the Los Angeles Municipal Code (LAMC), an amendment to the Porter Ranch Land Use/Transportation Specific Plan, Section 9.O.3, relating to the "Equestrian Staging Area" in order to be consistent with the recent amendment to the Porter Ranch Development Agreement, heard by the City Planning Commission on September 28, 2017; and
3. **Adopt** the Findings.

The action was seconded by Commissioner Millman and the vote proceeded as follows:

Moved: Khorsand
 Seconded: Millman
 Ayes: Ambroz, Choe, Mitchell, Padilla-Campos, Perlman
 Absent: Mack, Dake Wilson

Vote: 7 – 0

MOTION PASSED

President Ambroz took Item No. 8 out of Order. Commissioner Khorsand left meeting at approximately 9:27 am.

ITEM NO. 8

[CPC-2017-3900-VZCJ-SPR-CDO](#)

CEQA: ENV-2006-7269-MND

Plan Area: Reseda – Van Nuys

Council District: 3 - Blumenfield

Last Day to Act: 01-08-18

PUBLIC HEARING HELD

(Previous public hearings were held on April 29, 2011, October 17, 2016 and June 23, 2017 under Case No. CPC-2008-4730-VZCJ-SPR-CDO)

PROJECT SITE: 6724 North Amigo Avenue

IN ATTENDANCE:

Valentina Knox-Jones, City Planner, Kevin Jones, Senior City Planner and Shana Bonstin, Principal City Planner representing the Planning Department; Arthur Kassan, representing the Department of Transportation, Athena Novak, Ahn & Associates representing the applicant Steve Zipp, One Amigo LLC; and Elizabeth Ene representing the Office of Councilmember Blumenfield.

MOTION:

Commissioner Millman put forth the actions below in conjunction with the approval of the following project with modifications as stated on the record:

The construction, use, and maintenance of a new 100-unit senior citizen (62 years and older) independent housing complex (99 units reserved for senior citizens and 1 manager's unit). The housing complex will total approximately 122,730 square-feet on an approximately 2.43 acres (105,771 square-foot) parcel. The project will provide a total of 143 parking stalls. The building's height will be a maximum of 45 feet within four stories. The project will include a gym, recreation room, community dining room, game room, library, computer room, and 16,600 square feet of open space. The proposed project will provide five percent (5%) of the total units at rents affordable to Extremely Low Income households (five units) and six percent (6%) of the total units at rents affordable to Very Low Income households (six units).

1. **Find**, pursuant to CEQA Guidelines Section 15074.1, the Substituted Mitigation Measure ("MM") for Aesthetics (MM I-120), Air Quality (MM III-50), Green House Gases (MM VII-10), and Noise (XII-20) is equivalent or more effective in mitigating or avoiding potentially significant effects than the Original MM and the Substituted MM in itself will not cause any potential significant effect on the environment; **Find**, pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including the Mitigated Negative Declaration, No. ENV-2006-7269-MND ("Mitigated Negative Declaration"), and all comments received, with the imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; **Find** the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; **Find** the mitigation measures have been made enforceable conditions on the project; and **Adopt** the Mitigated Negative Declaration, and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;
2. **Approve and Recommend** that the City Council Adopt a Vesting Zone Change from R1-1-RIO to (T)(Q)RD1.5-1-RIO (Multiple Residential Zone) on the center portion of the lot and from [Q]RA-1VL-CDORIO to (T)(Q)RAS4-1VL-CDO-RIO (Residential Accessory Services Zone) on the eastern portion of the lot;
3. **Approve**, pursuant to LAMC Section 11.5.11 (e), three (3) Developer Incentives:
 - a. A maximum height of 4 stories in lieu of the permitted 3 stories as permitted in the RAS4-1VL Zone;
 - b. A maximum height of 4 stories in lieu of the limitation in the Reseda-West Van Nuys Community Plan's Footnote No. 7 restricting the height of buildings in the General Commercial land use category to a maximum of 3 stories; and
 - c. Floor area, density, open space, and parking averaging over the project site and to permit vehicular access from a more restrictive zone (RD1.5) to a less restrictive zone (RAS4).
4. **Approve** the Site Plan Review for a residential apartment building 50 units or more;
5. **Approve** a Community Design Overlay Plan Approval within the Reseda Central Business District;
6. **Adopt** the Conditions of Approval as modified by the Commission, including the staff's technical modifications dated December 19, 2017; and
7. **Adopt** the Findings.

The action was seconded by Commissioner Perlman, who introduced a friendly amendment to the motion. The amendment was accepted by Commissioner Millman and the vote proceeded as follows:

Moved: Millman
 Seconded: Perlman
 Ayes: Ambroz, Choe, Mitchell, Padilla-Campos
 Absent: Khorsand, Mack, Dake Wilson

Vote: 6 – 0

MOTION PASSED

Commissioner Khorsand returned to the meeting. President Ambroz took Item No. 9 out of order.

ITEM NO. 9

[CPC-2017-849-GPAJ-VZCJ-HD-SPR](#)

CEQA: ENV-2017-850-MND

Plan Area: Central City

Council District: 14 - Huizar

Last Day to Act: 02-12-18

PROJECT SITE: 656 - 660 South Stanford Avenue

IN ATTENDANCE:

May Sirinopwongsagon, City Planner, Blake Lamb, Principal City Planner representing the Planning Department; Mee Semcken, Lee Consulting Group, LLC, representing the applicant Aaron Mandel, Lamp Lodge, LP.

MOTION:

Commissioner Perlman put forth the actions below in conjunction with the approval of the following project as recommended in the staff report with modifications by the Commission as stated on the record:

The removal of an existing three-story, 50-unit single-room occupancy residential building and surface parking lot for the construction of a new seven-story, approximately 48,970 square-foot residential building. The building will have a maximum of 82 residential dwelling units, with 81 units set aside for Very-Low Income households and one-unit designated as a manager's unit and will provide 16 automobile parking spaces and 91 bicycle parking spaces. The project would require the removal of two non-protected trees within the public right-of-way.

1. **Find**, pursuant to CEQA Guidelines Section 1507 4(b), after consideration of the whole of the administrative record, including the Mitigated Negative Declaration, No. ENV-2017-850-MND ("Mitigated Negative Declaration"), and all comments received, with the imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; **find** the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; **find** the mitigation measures have been made enforceable conditions on the project; and **adopt** the Mitigated Negative Declaration, and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;
2. **Approve**, pursuant to Charter Section 555 and Section 11.5.6 of the Los Angeles Municipal Code (LAMC), a General Plan Amendment to the Central City Community Plan to re-designate the land use of the Project Site from Light Manufacturing to Regional Commercial;
3. **Approve** and **recommend** that the City Council **adopt**, pursuant to LAMC Section 12.32 Q and F, a Vesting Zone Change and Height District Change on the Project Site from M2-2D to [T][Q]C2-2D, consistent with the proposed General Plan Amendment, and approve two Developer Incentives to permit:

- a. An 18 percent reduction in the required open space pursuant to LAMC Section 12.21 G and 12.22 A, 29 (c); and
 - b. a 48 percent reduction in the number of trees required pursuant to LAMC Section 12.21 G.
4. **Approve** the Site Plan Review for a project with 82 residential dwelling units;
 5. **Adopt** the Conditions of Approval including staff's technical correction and modifications to the staff report dated December 20, 2017; and
 6. **Adopt** the Findings.

The action was seconded by Commissioner Millman and the vote proceeded as follows:

Moved: Perlman
 Seconded: Millman
 Ayes: Ambroz, Khorsand, Mitchell, Padilla-Campos, Dake Wilson
 Absent: Mack, Dake Wilson

Vote : 7 – 0

MOTION PASSED

President Ambroz took Item No. 10 out of order.

ITEM NO. 10

CPC-2008-3470-SP-GPA-ZC-SUD-BL-M2

CEQA: ENV-2008-3471-EIR

Plan Area: Canoga Park-Winnetka-Woodland Hills-West Hills

Council District: 3 - Blumenfield

Last Day to Act: N/A

PROJECT AREA: Warner Center 2035 Plan Area

IN ATTENDANCE:

Jonathan Hershey, Senior City Planner, Craig Weber, Principal City Planner representing the Planning Department.

MOTION:

Commissioner Choe put forth the actions below in conjunction with the approval of the following ordinance along with staff's technical modifications dated December 20, 2017:

An ordinance, creating a Plan Implementation Board, to provide coordination on implementation activities required to effectuate the vision of the Warner Center 2035 Plan, pursuant to Sections 8 and 10.1 of the Plan, and to prioritize the expenditure of fees collected through implementation of the Warner Center 2035 Plan.

1. **Find**, based on the independent judgement of the decision-maker, after consideration of the whole of the administrative record, the project was assessed in EIR-2008-3471-EIR, SCH No. 1990011055, certified by City Council on April 24, 2013, and pursuant to CEQA Guidelines Sections 15162 and 15164, no subsequent EIR, negative declaration, or addendum is required for approval of the Project; and
2. **Approve** and **recommend** that the City Council **adopt** the proposed Ordinance creating the Plan Implementation Board, pursuant to Section 10.1 of the Warner Center 2035 Specific Plan.

Moved: Choe
 Seconded: Khorsand
 Ayes: Ambroz, Millman, Mitchell, Padilla-Campos
 Absent: Mack, Dake Wilson
 Abstained: Perlman

Vote: 7 – 0

MOTION PASSED

President Ambroz took Item No.11 out of order.

ITEM NO. 11

[CPC-2017-3951-CA](#)

CEQA: ENV-2017-3952-CE
 Plan Areas: All

Council Districts: All
 Last Day to Act: N/A

PROJECT SITE: Citywide

IN ATTENDANCE:

Patrick Whalen, City Planning Assistant, Phyllis Nathanson, Senior City Planner and Tom Rothmann, representing the Planning Department

MOTION:

Commissioner Khorsand put forth the actions below in conjunction with the approval of the following ordinance as recommended by staff:

An ordinance amending Sections 12.03, 12.21 and 12.26 of the Los Angeles Municipal Code (LAMC) to regulate Collection Bins.

1. **Determine** based on the whole of the administrative record, that the Project is exempt from CEQA pursuant to CEQA Guidelines, Section 15303 (Class 3), 15308 (Class 8 and 11), and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines;
2. **Approve** and **recommend** that the City Council **adopt** the proposed ordinance;
3. **Adopt** the staff report as the Commission report on the subject; and
4. **Adopt** the Findings.

The action was seconded by Commissioner Mitchell and the vote proceeded as follows:

Moved: Khorsand
 Seconded: Mitchell
 Ayes: Ambroz, Choe, Millman, Padilla-Campos, Perlman
 Absent: Mack, Dake Wilson

Vote: 7 – 0

MOTION PASSED

President Ambroz took Item No. 13 out of order.

ITEM NO. 13

CPC-2014-2590-TDR-SPR

CEQA: ENV-2014-2591-MND

Plan Area: Central City

Related Case: VTT-72343-CN

Council District: 14 – Huizar

Last Day to Act: 12-21-17

Continued From: 12-14-17

PROJECT SITE: 920 South Hill Street;
916 – 930 South Hill Street

IN ATTENDANCE:

May Sirinopwongsagon, City Planner, Blake Lamb, Principal City Planner and Shana Bonstin, Principal City Planner, representing the Planning Department; Kate Bartolo & Associates representing the applicant Joe Bednar, Agoura Oaks, LLC.

MOTION:

Commissioner Millman put forth the actions below in conjunction with the approval of the following project with modifications as stated on the record by the Commission:

The demolition of an existing surface parking lot, and the construction of a new 32-story, 346-foot, four-inch tall mixed-use, high-rise development consisting of 239 residential condominium units and four commercial condominium units with 5,671 square-feet of commercial space. The project would provide 295 parking spaces within in one subterranean level, and six above-grade parking levels.

1. **Find**, based on the independent judgment of the decision-maker, after consideration of the whole of the administrative record, the project was assessed in Mitigated Negative Declaration, No. ENV-2014-2591-MND, adopted on June 6, 2017 (under Case No. VTT 72343-CN); and pursuant to CEQA Guidelines, Sections 15162 and 15164, no subsequent EIR, negative declaration, or addendum is required for approval of the project;;
2. **Continue** the matter until a date uncertain, after and until the Agency Board acts on the requested TFAR Transfer Plan and Public Benefits Payment;;
3. **Approve**, pursuant to Section 16.05 of the Los Angeles Municipal Code, a Site Plan Review for a project with 239 residential dwelling units;
4. **Adopt** the Conditions of Approval including the staff's technical modification; and
5. **Adopt** the Findings.

The action was seconded by Commissioner Choe. Commissioner Ambroz introduced a friendly amendment to the motion. Commissioner Millman accepted the amendment and the vote proceeded as follows:

Moved: Millman
Second: Choe
Ayes: Ambroz, Khorsand, Mitchell, Padilla-Campos, Perlman
Absent: Mack, Dake Wilson

Vote: 7 – 0

MOTION PASSED

President Ambroz called for a break at approximately 10:51 a.m. and reconvened the meeting at 11:00 a.m. with Commissioners Choe, Khorsand, Millman, Mitchell, Padilla Campos and Perlman present.

President Ambroz took Item No.14 out of order.

ITEM NO. 14

CPC-2017-4546-CA

CEQA: ENV-2017-3361-SE

Plan Areas: All

Council Districts: All

Last Day to Act: N/A

Continued From: 12-14-17

PROJECT AREA: Citywide

IN ATTENDANCE:

Niall Huffman, City Planning Associate, Phyllis Nathanson, Senior City Planner and Tom Rothmann, Principal City Planner representing the Planning Department; Kenneth Fong, Deputy City Attorney representing the City Attorney's Office.

MOTION:

Commissioner Ambroz put forth the actions below in conjunction with the approval of the following ordinance with modifications as stated on the record by the Commission:

An ordinance enacting restrictions on commercial advertising of cannabis, cannabis products, commercial cannabis activity, or businesses engaged in any commercial cannabis activity on signs.

1. **Determine** that based on the whole of the administrative record, the project is exempt from CEQA pursuant to California Business and Professions Code Section 26055(h) on the basis that the project will adopt ordinances, rules and/or regulations that will require discretionary review under CEQA to approve licenses to engage in commercial cannabis activity in the City of Los Angeles;
2. **Approve** and **recommend** that the City Council **adopt** the proposed Ordinance;
3. **Adopt** the Staff Report as the Commission's Report on the subject; and
4. **Adopt** the Findings.

Moved: Ambroz

Seconded: Padilla-Campos

Ayes: Choe, Khorsand, Millman, Mitchell, Perlman

Absent: Mack, Dake Wilson

Vote: 7 – 0

MOTION PASSED

Commissioner Choe recused herself from Item No. 6 and left the meeting at approximately 11:37 a.m.

President Ambroz took Item No. 6 out of order.

ITEM NO. 6

[VTT-75032-CN-1A](#)

CEQA: ENV-2017-2441-CE

Related Case: DIR-2017-2442-SPR

Council District 10 – Wesson

Last Day to Act: 12-21-17

PROJECT SITE: 500 South Oxford Avenue

IN ATTENDANCE:

Joann Lim, City Planning Associate, Heather Bleemers, City Planner and Nicholas Hendricks, Senior City Planner representing the Planning Department; Boaz Miodovsky, Ketter Design representing the applicant Sang Hoon Chung, Fred & Jamison, LLC; Elsa Tung representing the appellant Tamika L. Butler, Los Angeles Neighborhood Land Trust.

President Ambroz called for a break at approximately 12:12 p.m. and reconvened the meeting at 12:20 p.m. with Commissioners Khorsand, Millman, Mitchell, Padilla Campos and Perlman present.

MOTION:

Commissioner Perlman put forth the actions below in conjunction with the approval of the following project with modifications as stated on the record by the Commission:

The merger and re-subdivision of four lots into one lot in conjunction with the construction, use, and maintenance of a proposed seven-story building with a maximum height of 89 feet containing 89 residential condominium units. The project will include 178 residential automobile parking spaces and 23 guest automobile parking within two subterranean levels and one at-grade level. Nine bicycle parking spaces will be located on the ground floor level. The project includes an application for a haul route for the export of 27,562 cubic yards of earth.

1. **Determine**, that the project is categorically exempt pursuant to California Environmental Quality Act (CEQA) Section 15332 (Class 32) and Section 15304 (Class 4, Category 1) and Section 21080 of the California Public Resources Code, and that there is no substantial evidence demonstrating that an exception to categorical exemption pursuant to CEQA Guidelines Section 15300.2 applies;
2. **Grant** the appeal in part, and **sustain** in part the Deputy Advisory Agency's determination to approve the Vesting Tentative Tract;
4. **Adopt** the Conditions of Approval with the modification to Condition No. 5 as recommended by staff; and
5. **Adopt** the Findings.

The action was seconded by Commissioner Khorsand and the vote proceeded as follows:

Moved: Perlman
 Seconded: Khorsand
 Ayes: Ambroz, Millman, Mitchell
 Noes: Padilla-Campos
 Absent: Choe, Mack, Dake Wilson

Vote: 5 – 1

MOTION PASSED

ITEM NO. 12

FREEWAY ADJACENT RESIDENTIAL STRUCTURES DISCUSSION

CEQA: N/A
 Plan Areas: All

Council Districts: All
 Last Day to Act: N/A

PUBLIC HEARING - Not Required

PROJECT AREA: Citywide

IN ATTENDANCE:

Blake Lamb, Principal City Planner, Shana Bonstin, Principal City Planner and Tom Rothmann, Principal City Planner representing the Planning Department.

MOTION:

Commissioner Ambroz requested that staff return to the Commission in March 2018 with an update on the matter. The action was seconded by Commissioner Millman and the vote proceeded as follows:

Moved: Ambroz
 Seconded: Millman
 Ayes: Khorsand, Mitchell, Padilla-Campos, Perlman
 Absent: Choe, Mack, Dake Wilson

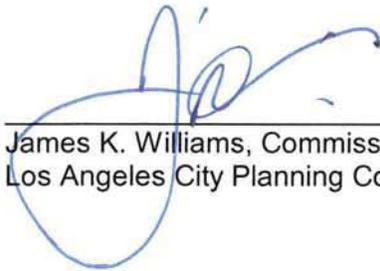
Vote: 6 – 0

MOTION PASSED

There being no further business before the Commission, the meeting adjourned at 12:55 p.m.



David Ambroz, President
Los Angeles City Planning Commission



James K. Williams, Commission Executive Assistant II
Los Angeles City Planning Commission

ADOPTED
CITY OF LOS ANGELES

JAN 11 2018

**CITY PLANNING DEPARTMENT
COMMISSION OFFICE**

LOS ANGELES CITY PLANNING COMMISSION
OFFICIAL MINUTES
THURSDAY, JANUARY 11, 2018

LOS ANGELES CITY COUNCIL CHAMBERS
200 NORTH SPRING STREET ROOM 340
LOS ANGELES, CALIFORNIA 90012

THESE MINUTES OF THE LOS ANGELES CITY PLANNING COMMISSION ARE REPORTED IN ACTION FORMAT. COMPLETE DETAILS, INCLUDING THE DISCUSSION, RELATING TO EACH ITEM ARE CONTAINED IN THE AUDIO RECORDING FOR THIS MEETING. RECORDINGS ARE ACCESSIBLE ON THE INTERNET AT <http://planning.lacity.org>. OR MAY BE REQUESTED BY CONTACTING CENTRAL PUBLICATIONS AT (213) 978-1255.

Commission Vice President Renee Dake Wilson called the regular meeting to order at 8:33 a.m. with Commissioners Caroline Choe, Vahid Khorsand, Marc Mitchell, Veronica Padilla-Campos and Dana Perlman in attendance.

Commissioners David Ambroz, John Mack and Samantha Millman were absent.

Also in attendance were Vincent Bertoni, Director of Planning, Kevin Keller, Executive Officer, Lisa Webber, Deputy Planning Director and Amy Brothers, Deputy City Attorney. Commission Office staff present were James K. Williams, Commission Executive Assistant II, Jason Wong, Senior Administrative Clerk and Rocky Wiles, Commission Office Manager.

ITEM NO. 1

DIRECTOR'S REPORT AND COMMISSION BUSINESS

- Director's Report - The Director gave a report related to the Department staffing and hiring. Ken Bernstein Principal City Planner is now overseeing the Urban Design Studio, Claire Bowin, Senior City Planner follows Ken in leaving Citywide Policy and will take a lead role in the Urban Design Studio. Arthi Varma, Principal City Planner has returned to the Department to head the Citywide Policy Section.
- Legal actions and issues update - Deputy City Attorney, Amy Brothers reported on two legal actions taken against the City of Los Angeles. The cases involved the project at 2171 Partridge Avenue and the Caruso Project at 333 La Cienega Boulevard. In both cases, the judge rejected the petitioners' challenges and found that the actions taken by the City were within its authority and according to Code.
- Advance Calendar - There were no changes to the advanced calendar
- Commission Requests - There were no requests by any member of the Commission.
- Minutes of Meeting - Commissioner Perlman moved to approve the Minutes of December 21, 2017 with corrections as stated on the record. The action was seconded by Commissioner Choe and the vote proceeded as follows:

Moved: Perlman
Seconded: Choe
Ayes: Khorsand, Mitchell, Padilla-Campos, Dake Wilson
Absent: Ambroz, Mack, Millman

Vote: 6 – 0

MOTION PASSED

ITEM NO. 2

NEIGHBORHOOD COUNCIL PRESENTATION:

There were no presentations by any Neighborhood Council representative or resolutions submitted to the Commission.

ITEM NO. 3

GENERAL PUBLIC COMMENT:

No speakers requested to address the Commission.

ITEM NO. 4a

RECONSIDERATIONS

There were no requests for reconsideration.

ITEM NO. 5 CONSENT CALENDAR

ITEM NO. 5a

[CPC-2016-4954-DB-SPR](#)

CEQA: ENV-2016-4955-MND

Plan Area: Westlake

Related Case: VTT-74711

Council District: 13 – O’Farrell

Last Day to Act: 1-11-18

PUBLIC HEARING – Completed December 6, 2018

PROJECT SITE: 1800-1850 West Beverly Boulevard, 114-118¾ South Bonnie Brae Street;
101-111 South Burlington Avenue

IN ATTENDANCE:

Oliver Netburn, City Planner, Nicholas Hendricks, Senior City Planner and Charlie Rausch, Acting Chief Zoning Administrator representing the Planning Department; Alex Irvine & Associates, Inc., representing the applicant Mike Schwartzman, CV 1800 Beverly, LLC.

MOTION:

Commissioner Choe put forth the actions below in conjunction with the approval of the following project as recommended in the staff report along with staff’s technical modifications dated January 10, 2018:

Demolition of the existing vacant warehouse, commercial building, 12-unit apartment building, and surface parking and the construction, use and maintenance of a new 79-foot tall, five-story mixed-use development with 243 residential units, of which 21 units or approximately 11 percent, would be designated for Very Low Income Households, and approximately 3,500 square feet of ground level retail and restaurant uses. The project would include 292 vehicle parking spaces and 272 bicycle parking spaces within a two and a half level parking garage.

1. **Find**, based on the independent judgment of the decision-maker, after consideration of the whole of the administrative record, the project was assessed in Mitigated Negative Declaration Case No. ENV-2016-4955-MND, adopted on December 20, 2017; and pursuant to CEQA Guidelines, Sections 15162 and 15164, no subsequent EIR, negative declaration, or addendum is required for approval of the project;
2. **Approve**, pursuant to Los Angeles Municipal Code (LAMC) Section 12.22 A.25 a 33 percent Density Bonus (with 11 percent of the base number of units set aside for Very Low Income Households), and pursuant to AB 744, one half parking space per bedroom for a total of 146 parking spaces;
3. **Approve**, pursuant to LAMC Section 12.22 A.25(f), two (2) On-Menu Incentives as follows:
 - a. Allow up to 20% decrease from the required open space, and
 - b. Allow the averaging of floor area, density, open space and parking over the project site, and permit vehicular access from a less restrictive zone to a more restrictive zone;
4. **Approve**, pursuant LAMC 12.22 A.25(g), one (1) Off-Menu Waiver to allow a 3.19:1 Floor Area Ratio (FAR) in lieu of the approximately 1.83:1 FAR otherwise permitted;
5. **Approve**, pursuant to LAMC Section 16.05, a Site Plan Review for a development which creates or results in an increase of more than 50 dwelling units;

The action was seconded by Commissioner Khorsand and the vote proceeded as follows:

Moved: Choe
 Seconded: Khorsand
 Ayes: Mitchell, Padilla-Campos, Perlman, Dake Wilson
 Absent: Ambroz, Mack, Millman

Vote: 6 – 0

MOTION PASSED

ITEM NO. 6

[CPC-2017-2121-DB](#)
 CEQA: ENV-2017-2122-CE
 Plan Area: Wilshire

Council District: 4 – Ryu
 Last Day to Act: 01-11-18
 Continued from: 11-16-17

Request from the Applicant to the City Planning Commission to extend the time in which to act on the application and to continue the matter to January 25, 2018. (Motion required)

PROJECT SITE: 4749 West Elmwood Avenue

IN ATTENDANCE:

Oliver Netburn, City Planner, Nicholas Hendricks, Senior City Planner and Charlie Rausch, Acting Chief Zoning Administrator representing the Planning Department.

MOTION:

Commissioner Khorsand moved to continue the matter to the City Planning Commission Meeting of February 22, 2018. The action was seconded by Commissioner Mitchell and the vote proceeded as follows:

Moved: Khorsand
 Seconded: Mitchell
 Ayes: Choe, Padilla-Campos, Perlman, Dake Wilson
 Absent: Ambroz, Mack, Millman

Vote: 6 – 0

MOTION PASSED

ITEM NO. 7

CPC-2017-1103-DB

CEQA: ENV-2017-1104-CE

Plan Area: Northeast Los Angeles

Council District: 14 – Huizar

Last Day to Act: 01-11-18

Continued from: 12-14-17

PUBLIC HEARING – Completed September 19, 2017

PROJECT SITE: 1332 West Colorado Boulevard

IN ATTENDANCE:

Azeen Khanmalek, City Planning Associate, Kevin Golden, City Planner and Shana Bonstin, Principal City Planner representing the Planning Department; Heather Lee, representing the applicant; Urita Ramos representing the Office of Councilmember Huizar.

MOTION:

Commissioner Perlman put forth the actions below in conjunction with the approval of the following project as recommended in the staff report along with staff's technical modifications dated January 11, 2018, and including modifications by the Commission as stated on the record:

Construction of a new, approximately 56,000 square foot mixed-use building with 26 residential units, 3,671 square feet of commercial floor area, and a total height of approximately 82 feet.

1. **Determine**, based on the whole of the administrative record that the project is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15332, and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies;
2. **Approve**, pursuant to Section 12.22 A.25(g)(3) of the Los Angeles Municipal Code (LAMC), a 32.5 percent Density Bonus for a project totaling 26 residential dwelling units reserving 10 percent, or two (2) units, for Very Low Income Households, and utilizing parking option 1, with one Off-Menu Incentive to allow a maximum Floor Area Ratio (FAR) of 2.01:1 in lieu of a 1:1, otherwise permitted pursuant to Ordinance No. 173,606 and Section 15.A of the Colorado

- Boulevard Specific Plan;
3. **Adopt** the Conditions of Approval as modified by the Commission, including the technical modifications by staff dated January 11, 2018; and
 4. **Adopt** the Findings.

The action was seconded by Commissioner Khorsand and the vote proceeded as follows:

Moved: Perlman
 Seconded: Khorsand
 Ayes: Choe, Mitchell, Padilla-Campos, Dake Wilson
 Absent: Ambroz, Mack, Millman

Vote : 6 – 0

MOTION PASSED

ITEM NO. 8

CPC-2017-1246-ZC-GPA

CEQA: ENV-2017-1247-ND

Plan Area: Northeast Los Angeles

Council District: 14 - Huizar

Last Day to Act: 03-27-18

PUBLIC HEARING REQUIRED

PROJECT SITE: 2093-2121 East Charlotte Street and 1201-1219 North Cornwell Street

IN ATTENDANCE:

Laura Krawczyk, City Planning Associate, Patricia Diefenderfer, Senior City Planner and Craig Weber, Principal City Planner representing the Planning Department.

MOTION:

Commissioner Dake Wilson put forth the actions below in conjunction with the approval of the following:

Pursuant to Los Angeles Municipal Code (LAMC) Sections 12.32 and 11.5.6, a City-initiated resolution and ordinance to revise the General Plan Land Use designation and zoning for private properties located at 2093-2121 East Charlotte Street and 1201-1219 North Cornwell Street. The proposed action does not include the demolition, remodel, construction, or alteration of existing structures.

1. **Find**, pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including the Negative Declaration, No. ENV-2017-1247-ND, (“Negative Declaration”), and all comments received, there is no substantial evidence that the project will have a significant effect on the environment; **Find** the Negative Declaration reflects the independent judgment and analysis of the City; and **Adopt** the Negative Declaration;
2. **Approve and Recommend** that the City Council **Adopt**, pursuant to City Charter Section 555 and Los Angeles Municipal Code Section 11.5.6, a General Plan Amendment to the

- Northeast Los Angeles Community Plan to change the land use designation from Public Facilities to Medium Residential;
3. **Approve and Recommend** that the City Council **Adopt**, pursuant to Los Angeles Municipal Code Section 12.32, a Zone Change from PF-1 to R3-1;
 4. **Adopt** the Findings.

The action was seconded by Commissioner Khorsand and the vote proceeded as follows:

Moved: Dake Wilson
 Seconded: Choe
 Ayes: Khorsand, Mitchell, Padilla-Campos, Perlman
 Absent: Ambroz, Mack, Millman

Vote: 6 – 0

MOTION PASSED



There being no further business before the Commission, the meeting adjourned at 9:19 a.m.

Renee Dake Wilson, Vice President
Los Angeles City Planning Commission

Vahid Khorsand, Commissioner
Los Angeles City Planning Commission

James K. Williams, Commission Executive Assistant II
Los Angeles City Planning Commission

ADOPTED
CITY OF LOS ANGELES

JAN 25 2018

**CITY PLANNING DEPARTMENT
COMMISSION OFFICE**

**LOS ANGELES CITY PLANNING COMMISSION
OFFICIAL MINUTES
THURSDAY, JANUARY 25, 2018**

VAN NUYS CITY COUNCIL CHAMBERS
14410 SYLVAN STREET, 2ND FLOOR
VAN NUYS CALIFORNIA 91401

THESE MINUTES OF THE LOS ANGELES CITY PLANNING COMMISSION ARE REPORTED IN ACTION FORMAT. COMPLETE DETAILS, INCLUDING THE DISCUSSION, RELATING TO EACH ITEM ARE CONTAINED IN THE AUDIO RECORDING FOR THIS MEETING. RECORDINGS ARE ACCESSIBLE ON THE INTERNET AT <http://planning.lacity.org>. OR MAY BE REQUESTED BY CONTACTING CENTRAL PUBLICATIONS AT (213) 978-1255.

Commission President David Ambroz called the regular meeting to order at 8:40 a.m. with Commission Vice President Renee Dake Wilson and Commissioners Vahid Khorsand, Marc Mitchell and Veronica Padilla-Campos in attendance.

Commissioners John Mack, Samantha Millman and Dana Perlman were absent.

Commissioner Caroline Choe arrived at 8:51 am.

Also in attendance were Vincent Bertoni, Director of Planning, Kevin Keller, Executive Officer, Lisa Webber, Deputy Planning Director and Donna Wong, Deputy City Attorney. Commission Office staff present were James K. Williams, Commission Executive Assistant II, Jason Wong, Senior Administrative Clerk and Rocky Wiles, Commission Office Manager.

ITEM NO. 1

DIRECTOR'S REPORT AND COMMISSION BUSINESS

- Planning Director Vince Bertoni gave an update on the Small Lot Subdivision Standard Revisions. This item came before the Commission approximately one year ago and went to the Planning and Land Use Management (PLUM) Committee which recommended approval before sending it to the full City Council for review and adoption. Director Bertoni yielded the floor to Deputy Director Lisa Webber who highlighted a few details of the ordinance. She stated that the ordinance would return to the City Planning Commission in March for a final approval.
- Legal actions and issues update: Deputy City Attorney, Donna Wong had no report.
- Advance Calendar: There were no changes to the advanced calendar.
- Commission Requests: There were no requests.
- Minutes of Meeting:
Commissioner Dake Wilson moved to approve the Minutes of January 11, 2018. The action was seconded by Commissioner Padilla-Campos and the vote proceeded as follows:

Moved: Dake Wilson
Seconded: Padilla-Campos
Ayes: Ambroz, Khorsand, Mitchell
Absent: Choe, Mack, Millman, Perlman

Vote: 5 – 0

MOTION PASSED

ITEM NO. 2

NEIGHBORHOOD COUNCIL PRESENTATION:

There were two presentations by Neighborhood Council representatives along with resolutions submitted to the Commission.

ITEM NO. 3

GENERAL PUBLIC COMMENT:

No speakers requested to address the Commission.

ITEM NO. 4

RECONSIDERATIONS

There were no requests for reconsideration.

ITEM NO. 5

CONSENT CALENDAR

There were no consent items.

ITEM NO. 6
CPC-2014-4226-DB-SPR-CDO

CEQA: ENV-2014-4227-MND

Plan Area: Reseda - West Van Nuys

Council District: 3 – Blumenfield

Last Day to Act: 01-25-18

Continued from: 10-26-17

PUBLIC HEARING Completed September 11, 2015 and October 26, 2017**PROJECT SITE:** 6916 North Reseda Boulevard

The Commission considered a request to extend the time to act in which to act on the application and to continue the matter to March 8, 2018.

IN ATTENDANCE:

Courtney Shoenwald, City Planner, Blake Lamb, Principal City Planner representing the Planning Department; Tom Stemnock, Planning Associates, Inc. representing the applicant EMC Capital Group, LLC.

MOTION:

Commissioner Ambroz moved to continue the item to the City Planning Commission Meeting of March 22, 2018. Commissioner Dake Wilson seconded the motion and the vote proceeded as follows:

Moved: Ambroz
 Seconded: Dake Wilson
 Ayes: Khorsand, Mitchell, Padilla-Campos
 Absent: Choe, Mack, Millman, Perlman

Vote: 5 – 0**MOTION PASSED**

Commissioner Choe joined the meeting.

ITEM NO. 7
CPC-2016-2248-GPA-VZC-HD-SP-CU-ZV-WDI

CEQA: ENV-2016-1662-EIR (SCH No. 2016071041)

Plan Area: Encino – Tarzana

Related Case: VTT-74314

Council District: 3 – Blumenfield

Last Day to Act: 01-25-18

PUBLIC HEARING - HELD Completed November 14, 2017**PROJECT SITE:** 18321 West Clark Street;
18365 West Clark Street;
18411 West Clark Street;
18370 West Burbank Boulevard;

18410 West Burbank Boulevard;
18420 West Burbank Boulevard;
APN No. 2160010035

IN ATTENDANCE:

Elva Nuno-O'Donnell, City Planner, Luciralia Ibarra, Senior City Planner and Charlie Rausch, Acting Zoning Administrator representing the Planning Department; Albert Sagulian, representing the Department of Transportation; Cindy Starrett and Beth Gordie, Latham & Watkins LLP representing the applicant Jeremy Stremme, Providence Health System Southern California; Dale Surowitz, Providence Tarzana; David Garfinkle, representing the Tarzana Neighborhood Council; Andrew Pennington, representing the Office of Councilmember Blumenfield.

MOTION:

Commissioner Khorsand put forth the actions below in conjunction with the approval of the following project with modifications to the Conditions of Approval:

Providence Health System-Southern California, the Project Applicant, proposes to renovate and construct new facilities at the Providence Tarzana Medical Center as part of the Providence Tarzana Medical Center Project (Project). The Project will be implemented on the existing Providence Tarzana Medical Center (Project Site) located in the Encino-Tarzana community of the City of Los Angeles. The Project Site comprises approximately 13 acres and is currently improved with four permanent buildings, eight modular buildings, a parking structure, and surface parking areas. The Project proposes upgrades and enhancements to the Hospital on the Project Site, including replacing the Hospital's Main Building (Main Building Replacement), expanding the diagnostic and treatment areas (D&T Expansion), constructing a new central utility plant in the basement of the New Patient Wing, and constructing a new patient wing (New Patient Wing). The Project would also include the construction of a new above-grade, six-level parking structure that would provide approximately 565 parking spaces. To provide for the proposed improvements, the Project would include removal of the existing pharmacy within the Hospital, eight modular buildings, and the MRI Building. The uses in these existing buildings, including the pharmacy, would be relocated within the Hospital. Overall, the Project would remove approximately 37,198 square feet of existing floor area and construct approximately 294,000 square feet of new floor area, resulting in a net increase of approximately 256,802 square feet of net new floor area within the Project Site. The Project would remove 115 existing trees on the Property.

1. **Find**, pursuant to Section 21082.1(c)(3) of the California Public Resources Code, the consideration and certification of the Environmental Impact Report (EIR), ENV-2016-1662-EIR, SCH No. 2016071041, for the above-referenced project, and **adopt** the Statement of Overriding Considerations setting forth the reason and benefits of adopting the EIR with full knowledge that significant impacts may remain; pursuant to Section 21081.6 of the California Public Resources Code, **adopt** the proposed Mitigation Measures and Mitigation Monitoring Program; and pursuant to Section 21081 of the California Public Resources Code, **adopt** of the required findings for the certification of the EIR;
2. **Approve** and **recommend** that the City Council **approve**, pursuant to Section 11.5.6 of the Los Angeles Municipal Code (LAMC), to add a site specific Footnote (No.19) to the Encino-Tarzana Community Plan to read as follows: "Height District 1. The use of this property shall be limited to Height District 1 and as established in the ordinance implementing CPC-2016-2248-GPA-VZC-HD-SP-CU-ZV-WDI;
3. **Approve**, and **recommend** that the City Council **adopt**, pursuant to LAMC Section 11.5.7 G, a Specific Plan Amendment to the Ventura/Cahuenga Boulevard Corridor Specific Plan to exclude the project site from Map 5-Tarzana Section and Pedestrian Oriented Areas;;
4. **Approve**, and **recommend** that the City Council **adopt**, pursuant to LAMC Sections 12.32

- F and 12.32 Q, a Vesting Zone and Height District Change from [Q]C2-1L, C2-1, and P-1 to [T][Q]C2-1;
5. **Approve**, pursuant to LAMC Section 12.24.U.14, a Conditional Use Permit for a Major Development Project that creates 100,000 square feet of floor area in the C2 Zone;
 6. **Approve**, pursuant to Charter Section 562 and LAMC Section 12.27, a Zone Variance from LAMC Sections 14.4.2 and 14.4.8.B for a monument sign with a vertical dimension greater than its horizontal dimension and with a height of more than eight feet above grade, and LAMC Sections 14.4.1 O.A(1) and (2) for a wall sign which exceeds its permitted sign area;
 7. **Dismiss** a Waiver of Dedications and Improvements as no longer necessary pursuant to the Advisory Agency's action of December 5, 2017 for related Case No. VTT-74314;
 8. **Adopt** the Conditions of Approval as modified by the Commission; and
 9. **Adopt** the Findings.

The action was seconded by Commissioner Dake Wilson and the vote proceeded as follows:

Moved: Khorsand
 Seconded: Dake Wilson
 Ayes: Ambroz, Choe, Mitchell, Padilla-Campos
 Absent: Mack, Millman, Perlman

Vote: 6 – 0

MOTION PASSED

Commissioner Ambroz called for a break at 10:01 a.m. The meeting reconvened at 10:07 a.m. with Commissioners Choe, Khorsand, Mitchell, Padilla-Campos and Dake Wilson in attendance.

Commissioner Mitchell recused himself from Item No. 8 and left the meeting.

ITEM NO. 8

CPC-2017-2864-ZC

CEQA: ENV-2017-2865-ND
 ENV-2018-0153-CE

Plan Area: Hollywood and Bel Air – Beverly Crest

Council District: 4 - Ryu
 Last Day to Act: N/A

PUBLIC HEARING – Completed September 27, 2017

PROJECT SITE:

The Project Area consists of the neighborhoods known as “Bird Streets” and “Laurel Canyon” within Council District 4. The Bird Streets neighborhood is generally bounded by Trousdale Estates neighborhood of the City of Beverly Hills to the west, Rising Glen Road / Sunset Plaza Drive to the east, Crescent Drive to the north and the City of West Hollywood to the south. The Laurel Canyon neighborhood is generally bounded by the City of West Hollywood to the south, Mulholland Drive / Woodrow Wilson Drive to the north, Nichols Canyon Road to the east, and Rising Glen Road / Sunset Plaza Drive to the west.

IN ATTENDANCE:

Giselle Corella, City Planning Associate, Christine Saponara, Senior City Planner and Craig Weber, Principal City Planner representing the Planning Department; Julia Duncan representing the Office of Councilmember Ryu.

MOTION:

Commissioner Ambroz put forth the actions below in conjunction with the approval of the following project with technical modifications as stated on the record:

The proposed Zone Change Ordinance establishes a Hillside Construction Regulation (HCR) Supplemental Use District (SUD) that applies specific supplemental development restrictions related to construction, grading quantities, and hauling requirements applicable to the Project Area. The proposed ordinance, by itself, does not authorize or expand any development or construction activities, but instead places development restrictions on construction or hauling practices related to by-right projects in order to reduce the potential impacts from development activities in hillside areas. The regulations would be triggered by application for a building permit for a "project" (defined as the construction, erection, alteration of, or addition to single-family dwelling units located entirely or partially in the Project Area). The Zone Change Ordinance would add the HCR SUD regulations in addition to the base zone (e.g., R1-1-HCR) to restrict the issuance of a building permit for a "project" (as defined above) that is not consistent with the provisions of the HCR SUD. The HCR SUD imposes specific supplemental development restrictions regarding the construction process including: proper identification of hauling vehicles, maximum quantity of allowable grading, and a site plan review process for projects relating to large-scale single-family units in the Project Area.

1. **Determine**, pursuant to CEQA Guidelines Section 15074(b), consideration of the whole of the administrative record, including the Negative Declaration, No. ENV-2017-2865-ND ("Negative Declaration"), and all comments received, that there is no substantial evidence that the project will have a significant effect on the environment; find the Negative Declaration reflects the independent judgment and analysis of the City; and adopt Negative Declaration;
2. **Determine**, pursuant to CEQA Guidelines, Section 15308 (Class 8), an Exemption from CEQA, and that there is no substantial evidence demonstrating that an exception to a Categorical Exemption pursuant to CEQA Guidelines, Section 15300.2 applies; and
3. **Approve** and **recommend** that the City Council **adopt**, pursuant to Section 12.32 F of the Los Angeles Municipal Code (LAMC), a Zone Change Ordinance from those parcels lying within the project boundaries identified in the proposed Ordinance Map from [Q]PF-1XL, [Q]R3-1XL, A1-1XL, C2-1, C4-1D, CR-1D, OS-1XL, PB-1, R1-1, R3-1, R4-1D, RD1.5-1XL, RD6-1, RE11-1, RE15-1, RE15-1-H, RE20-1-H, RE40-1, RE40-1-H, and RE9-1, to [Q]PF-1XL-HCR, [Q]R3-1XL-HCR, A1-1XL-HCR, C2-1-HCR, C4-1D-HCR, CR-1D-HCR, OS-1XL-HCR, PB-1-HCR, R1-1-HCR, R3-1-HCR, R4-1D-HCR, RD1.5-1XL-HCR, RD6-1-HCR, RE11-1-HCR, RE15-1-HCR, RE15-1-H-HCR, RE20-1-H-HCR, RE40-1-HCR, RE40-1-H-HCR, RE9-1-HCR;
4. **Adopt** the staff report as its report on the subject, including staff's Technical Modification dated January 19, 2018; and
5. **Adopt** the Findings.

The action was seconded by Commissioner Dake Wilson and the vote proceeded as follows:

Moved: Ambroz
 Seconded: Dake Wilson
 Ayes: Choe, Khorsand, Padilla-Campos
 Recused: Mitchell
 Absent: Mack, Millman, Perlman

Vote: 5 – 0

MOTION PASSED

Commissioner Mitchell returned to the meeting.

ITEM NO. 9

CPC-2017-1616-ZC

CEQA: ENV-2017-1617-CE

Plan Areas: Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass

Council District: 4 – Ryu

Last Day to Act: 01-25-18

PUBLIC HEARING – Completed December 4, 2017

PROJECT SITE: 4500 North Woodman Avenue;
4464, 4465, 4469, 4470, and 4471 North Ventura Canyon Avenue

IN ATTENDANCE:

Adrineh Melkonian, Planning Assistant, Christine Saponara, Senior City Planner and Blake Lamb, Principal City Planner representing the Planning Department; Julia Duncan representing the Office of Councilmember Ryu.

MOTION:

Commissioner Mitchell put forth the actions below in conjunction with the approval of the following ordinance as recommended in the staff report with technical modifications as stated on the record:

City-initiated ordinance to revise the existing zoning of the project site.

1. **Determine**, pursuant to CEQA Guidelines Section 15332, an Exemption from CEQA, and that there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies;
2. **Approve** and **recommend** that the City Council **adopt**, pursuant to Los Angeles Municipal Code Section 12.32, a Zone Change from R1-1-RIO to R3-1-RIO for the subject site;
3. **Adopt** staff's Technical Modification dated January 24, 2018, to include the Zoning Map, as part of the proposed ordinance; and
4. **Adopt** the Findings.

The action was seconded by Commissioner Choe and the vote proceeded as follows:

Moved: Mitchell

Seconded: Choe

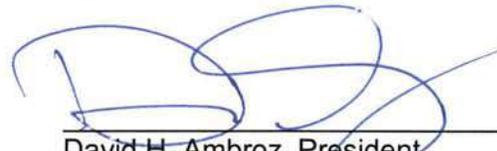
Ayes: Ambroz, Khorsand, Padilla-Campos, Dake Wilson

Absent: Mack, Millman, Perlman

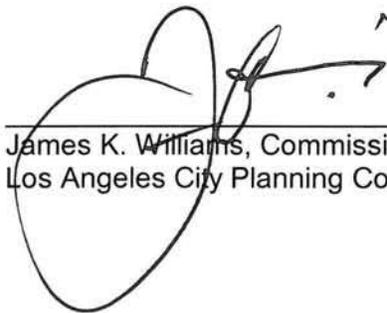
Vote : 6 – 0

MOTION PASSED

There being no further business before the Commission, the meeting adjourned at 10:39 a.m.



David H. Ambroz, President
Los Angeles City Planning Commission



James K. Williams, Commission Executive Assistant II
Los Angeles City Planning Commission

ADOPTED

CITY OF LOS ANGELES

FEB 08 2018

**CITY PLANNING DEPARTMENT
COMMISSION OFFICE**

**CITY PLANNING COMMISSION
REGULAR MEETING AGENDA
THURSDAY, FEBRUARY 8, 2018 after 8:30 a.m.
LOS ANGELES CITY COUNCIL CHAMBER, ROOM 340
200 NORTH SPRING STREET, LOS ANGELES, CALIFORNIA 90012**

David H. Ambroz, President
Renee Dake Wilson, AIA, Vice President
Caroline Choe, Commissioner
Vahid Khorsand, Commissioner
John W. Mack, Commissioner
Samantha Millman, Commissioner
Marc Mitchell, Commissioner
Veronica Padilla-Campos, Commissioner
Dana Perlman, Commissioner

Vincent P. Bertoni, AICP, Director
Kevin J. Keller, AICP, Executive Officer
Lisa M. Webber, AICP, Deputy Director

James K. Williams, Commission Executive Assistant II
cpc@lacity.org
(213) 978-1295

POLICY FOR DESIGNATED PUBLIC HEARING ITEMS

Pursuant to the Commission's general operating procedures, the Commission at times must necessarily limit the speaking times of those presenting testimony on either side of an issue that is designated as a public hearing item. In all instances, however, equal time is allowed for presentation of pros and cons of matters to be acted upon. All requests to address the Commission on public hearing items must be submitted prior to the Commission's consideration of the item. **EVERY PERSON WISHING TO ADDRESS THE COMMISSION MUST COMPLETE A SPEAKER'S REQUEST FORM AND SUBMIT IT TO THE COMMISSION STAFF.**

Written submissions are governed by Rule 4.3 of the Los Angeles City Planning Commission Rules and Operating Procedures which is posted online at https://planning.lacity.org/CPC_PoliciesAndAdvisoryNotices.html. All submissions within 48 hours of the meeting, including the day of meeting are limited to 2 pages plus accompanying photographs. 20 hard copies must be submitted the day of the meeting. Submissions that do not comply with these rules will be stamped "File Copy. Non-Complying Submission." Non-complying submissions will be placed into the official case file, but they will not be delivered to or considered by the CPC, and will not be included in the official administrative record for the item at issue.

The Commission may ADJOURN FOR LUNCH at approximately 12:00 Noon. Any cases not acted upon during the morning session will be considered after lunch.

The Commission may RECONSIDER and alter its action taken on items listed herein at any time during this meeting or during the next regular meeting, in accordance with the Commission Rules and Operating Procedures and provided that the Commission retains jurisdiction over the case. **In the case of a Commission meeting cancellation, all items shall be continued to the next regular meeting date or beyond, as long as the continuance is within the legal time limits of the case or cases.**

Sign language, interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request no later than **7 days** prior to the meeting by calling the Commission Executive Assistant at (213) 978-1300 or by e-mail at CPC@lacity.org.

If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agenzized here, or in written correspondence on these matters delivered to this agency at or prior to the public hearing.

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

AGENDAS are posted for public review in the Main Street lobby of City Hall East, 200 N. Main Street, Los Angeles. Commission meetings may be heard on Council Phone by dialing (213) 621-2489 or (818) 904-9450.

Agendas, Draft and Adopted Minutes are available on line at <http://planning.lacity.org>, by selecting "Commissions & Hearings", "City Planning Commission", "Agendas" under the specific meeting date. The Draft Minutes under Item 1 will also be available on the day of the meeting. Meeting Minutes are available to the public at the Commission Office, 200 North Spring Street, Room 532, Los Angeles, from 8:00 a.m. to 4:00 p.m. Monday through Friday.

1. **DIRECTOR'S REPORT AND COMMISSION BUSINESS**

- Update on City Planning Commission Status Reports and Active Assignments
- Legal actions and issues update
- Other Items of Interest
- Advance Calendar
- Commission Requests
- Meeting Minutes – January 25, 2018

2. **NEIGHBORHOOD COUNCIL PRESENTATION**

Presentation by Neighborhood Council representatives on any Neighborhood Council resolution, or community impact statement filed with the City Clerk, which relates to any agenda item listed or being considered on this agenda. The Neighborhood Council representative shall provide the Board or Commission with a copy of the Neighborhood Council's resolution or community impact statement. THESE PRESENTATIONS WILL BE TAKEN AT THE TIME THE AGENDA ITEM IS CALLED FOR CONSIDERATION.

3. **GENERAL PUBLIC COMMENT**

The Commission shall provide an opportunity in open meetings for the public to address it **on non-agenda items**, for a cumulative total of up to thirty (30) minutes, on items of interest to the public that are within the subject matter jurisdiction of the Commission.

PERSONS WISHING TO SPEAK MUST SUBMIT A SPEAKER'S REQUEST FORM. ALL REQUESTS TO ADDRESS THE COMMISSION ON NON-AGENDA ITEMS AND ITEMS OF INTEREST TO THE PUBLIC THAT ARE WITHIN THE JURISDICTION OF THE COMMISSION MUST BE SUBMITTED PRIOR TO THE COMMENCEMENT OF THE PUBLIC COMMENT PERIOD.

4. **RECONSIDERATIONS**

- a. **MOTIONS TO RECONSIDER** - The Commission may make a motion to reconsider a Commission Action on any agenda items from its previous meeting, consistently with the Commission Rule 8.3, provided the Commission retains jurisdiction over the matter.
- b. **MERITS OF ANY ITEM THE COMMISSION HAS VOTED TO RECONSIDER** – If a majority of the Commission has approved a motion to reconsider a Commission Action, the Commission may address the merits of the original Commission Action.

5. **CONSENT CALENDAR** *(No Items)*

Consent Calendar items are considered to be not controversial and will be treated as one agenda item. The Consent Calendar will be enacted by one motion. There will be no separate discussion of these items unless the item is removed from the Consent Calendar, in which event the item will be considered as time allows on the regular agenda.

6. **CPC-2016-3841-ZV-CU-CUB-SPR**
CEQA: ENV-2015-3167-MND-REC1
Plan Area: Hollywood
Related Case: DIR-2015-3166-SPR

Council District: 13 – O’Farrell
Last Day to Act: 02-08-18

PUBLIC HEARING – Completed December 5, 2017

PROJECT SITE: 1400 North Cahuenga Boulevard;
1414 North Cahuenga Boulevard; 6407, 6413 De Longpre Avenue;
1403, 1405, 1408, 1413 Ivar Avenue

PROPOSED PROJECT:

Construction, use, and maintenance of an eight-story (seven-story plus mezzanine), approximately 94-foot in height, 74,362 square-foot, 220 room boutique hotel (“The Godfrey”). The hotel will include a 2,723 square-foot ground floor restaurant, a third floor courtyard, and rooftop lounge with 1,440 square feet of floor area with a total of 476 seats (133 on the ground floor, 66 in the courtyard, and 277 seats on the rooftop). The project will include 104 on-site automobile parking spaces within three levels of subterranean parking and 94 bicycle parking spaces.

REQUESTED ACTIONS:

1. Based on the independent judgement of the decision-maker, after consideration of the whole of the administrative record, that the project was assessed in Mitigated Negative Declaration, No. ENV-2015-3167-MND adopted on June 16, 2016; and pursuant to CEQA Guidelines 15162 and 15164, as supported by the Addendum dated November 9, 2017, no major revisions are required to the Mitigated Declaration, and no subsequent EIR or negative declaration is required for approval of the project;
2. Pursuant to Los Angeles Municipal Code (LAMC) Section 12.27, a Zone Variance to permit rooftop dining above the ground floor in the C4 Zone;
3. Pursuant to LAMC Section 12.24 U, a Conditional Use to permit an increase in Floor Area Ratio (FAR) beyond the currently permitted 3:1 as established by the “D” Limitation under Ordinance No. 165,661, up to a maximum FAR of 3.69:1;
4. Pursuant to LAMC Section 12.24 W.1, a Conditional Use to permit the sale and dispensing of a full line of alcoholic beverages for on-site consumption in conjunction with a proposed hotel with on-site restaurants and bars; and
5. Pursuant to LAMC Section 16.05, Site Plan Review for a development that creates 50 or more guest rooms.

Applicant: 1400 Cahuenga JV, LLC; Oxford Hollywood, LLC
Representative: Dana Sayles, Three6ixty

Staff: JoJo Pewsawang, City Planner
jojo.pewsawang@lacity.org
(213) 978-1214

7. [CPC-2017-1014-CU-ZAA-ZAD-SPR](#)
CEQA: ENV-2017-1015-MND
Plan Area: Harbor Gateway

Council District: 15 – Buscaino
Last Day to Act: 02-08-18

PUBLIC HEARING – Completed December 20, 2017

PROJECT SITE: 15116-15216 South Vermont Avenue;
747-761 West Redondo Beach Boulevard

PROPOSED PROJECT:

Construction, use and maintenance of a one-story (with a 25,000 square-foot mezzanine), 54-foot tall, 341,402 square-foot warehouse/manufacturing/high-cube warehouse/distribution center with a total of 233 automobile parking spaces and 32 bicycle parking spaces. The project also includes 36 dock high truck loading positions and parking for up to 71 trailers.

REQUESTED ACTIONS:

1. Pursuant to CEQA Guidelines Section 15074(b), consideration of the whole of the administrative record, including the Mitigated Negative Declaration No. ENV-2017-1015-MND (“Mitigated Negative Declaration”), all comments received, the imposition of mitigation measures and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;
2. Pursuant to Los Angeles Municipal Code (LAMC) Section 12.24 U.14, a Conditional Use Permit for a development which creates 250,000 square feet or more of warehouse floor area;
3. Pursuant to LAMC Section 12.24 W.27, a Conditional Use Permit to allow:
 - a. Less than 50 percent glazing; and
 - b. 24-hour operation in lieu of the otherwise permitted 7:00 a.m. to 11:00 p.m.
4. Pursuant to LAMC Section 12.28 A, a Zoning Administrator’s Adjustments from LAMC 12.21.1 A, to allow a maximum building height of 54 feet in lieu of the otherwise 45 feet; and
5. Pursuant to LAMC Section 16.05, Site Plan Review for a development which creates or results in an increase of more than 50,000 square feet of non-residential floor area.

Applicant: Prologis, LP
Representative: Armen Ross, The Ross Group

Staff: Oliver Netburn, City Planner
oliver.netburn@lacity.org
(213) 978-1382

8. [CPC-2016-4962-VZC-HD-MCUP-ZV-SPR](#)
CEQA: ENV-2016-4963-CE
Plan Area: Central City

Council District: 14 – Huizar
Last Day to Act: 03-27-18

PUBLIC HEARING REQUIRED

PROJECT SITE: 755 South Los Angeles Street;
751 – 761 South Los Angeles Street

PROPOSED PROJECT:

Improvements to an existing 79,793 square-foot light manufacturing building with a 15,879 square-foot basement currently used for storage. The improvements would include a change of use from clothing manufacturing, retail, accessory office, and storage uses to office, food hall/restaurant, and storage uses; and a 9,541 square-foot rooftop restaurant addition, resulting in a net floor area increase of 6,856 square feet and a total floor area of 86,649 square feet. The Project Site has a lot area of approximately 18,024 square feet, and the Project would have a Floor Area Ratio (FAR) of approximately 4.9:1. The floor area will be distributed as follows: 59,292 square feet of general and/or

creative office space on floors two through five; and nine restaurants totaling 27,357 square feet, including an eight-tenant food hall with outdoor dining on the ground floor/mezzanine and basement, and one rooftop restaurant with outdoor dining. Four automobile parking spaces would be provided off-site, and 12 bicycle parking spaces would be provided on-site (four short-term and eight long-term).

REQUESTED ACTIONS:

1. Pursuant to CEQA Guidelines, Section 15300 an Exemption from CEQA, Article III, Section 1, Classes 1 and 32, and that there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies;
2. Pursuant to Los Angeles Municipal Code (LAMC) Sections 12.32 Q and F, a Vesting Zone Change and Height District Change from M2-2D to M2-2D to amend the Development “D” Limitation to permit a 4.9:1 FAR in lieu of the existing D Limitation of a 3:1 FAR;
3. Pursuant to LAMC Section 12.24 W.1, a Master Conditional Use Permit to allow the sale of a full line of alcoholic beverages for on-site consumption, in conjunction with nine restaurants totaling 27,357 square feet and 1,152 seats; and pursuant to LAMC Section 12.24 S, a 20 percent reduction in the number of required parking spaces;
4. Pursuant to LAMC Section 12.27, a Variance from LAMC Section 12.26 E.5 to provide automobile parking spaces off-site within 750 feet by lease in lieu of recorded covenant; and
5. Pursuant to LAMC Section 16.05, Site Plan Review for a change of use that results in an increase of 1,000 or more average daily trips.

Applicant: 755 South Los Angeles Street, LLC
Representative: Stephen Kia, Urban Concepts

Staff: Michael Sin, City Planning Associate
michael.sin@lacity.org
(213) 978-1345

9. [VTT-74169-1A](#)
CEQA: ENV-2016-1955-MND
Plan Area: Hollywood
Related Case: CPC-2016-1954-CU-MCUP-DB-SPR-SPP

Council District: 13 – O’Farrell
Last Day to Act: 02-08-18

PUBLIC HEARING REQUIRED

PROJECT SITE: 1860, 1868 North Western Avenue;
5440, 5446, 5448 West Franklin Avenue

PROPOSED PROJECT:

Demolition of a gas station, a one-story single-family residence and a one-story duplex and the construction of a 97,334-square-foot, 60-foot, five-story mixed use project that includes 87 residential units and approximately 6,000 square feet of ground floor commercial. Of the 87 units, 20 percent or 11 units will be set aside as Restricted Affordable Units for Very Low Income Households. The project provides a total of 112 parking spaces located on the ground level and in one subterranean parking level. The project is located in the C4-1D and R3-1 Zones within Subareas A (Neighborhood Conservation) and B (Mixed Use Boulevards) of the Vermont/Western Station Neighborhood Area Plan (SNAP) Transit Oriented District Specific Plan.

APPEAL:

Appeal of the Deputy Advisory Agency’s determination to approve a Vesting Tentative Tract Map to allow the merger and re-subdivision of the project site into a single ground lot and the merger of 4.5 feet of previously dedicated area along Franklin Avenue back into the project site and approval of a haul route; and appeal of the Mitigated Negative Declaration ENV-2016-1955-MND, mitigation measures and the Mitigation Monitoring Program for the project.

Applicant: Damon Porter, Western & Franklin, LLC
Representative: Craig Lawson, Craig Lawson & Company, LLC

Appellants: Ronald Ostrow; Mark Mauceri; Christina Khanjian; Gary Khanjian; Nuel Tate; Nyla Arslanian; Karen De La Carriere; Jeffrey Augustine; George Abrahams and Alexandra Kondrake; William and Rebecca Beech; Drew Murphy (Franklin & Western Improvement Association)
(11 Appellants)

Staff: Monique Acosta, City Planning Associate
monique.acosta@lacity.org
(213) 978-1173

10. **CPC-2016-1954-CU-MCUP-DB-SPP-SPR**

CEQA: ENV-2016-1955-MND
Plan Area: Hollywood
Related Case: VTT-74169-1A

Council District: 13 – O’Farrell
Last Day to Act: 02-28-18

PUBLIC HEARING - Completed March 23, 2017

PROJECT SITE: 1860, 1868 North Western Avenue;
5440, 5446, 5448 West Franklin Avenue

PROPOSED PROJECT:

Proposed Project involves the demolition of a gas station, a one-story single-family residence and a one-story duplex; and the construction of a 97,334 square-foot, five-story mixed use project that includes 87 residential units and approximately 6,000 square feet of commercial ground floor area, measuring 60 feet in height. Of the 87 units, 20 percent or 11 units will be set aside as Restricted Affordable Units for Very Low Income Households. The project provides a total of 112 parking spaces located on the ground level and in one subterranean parking level. The project is located in the C4-1D and R3-1 Zones within Subareas A (Neighborhood Conservation) and B (Mixed Use Boulevards) of the Vermont/Western Station Neighborhood Area Plan (SNAP) Transit Oriented District Specific Plan.

REQUESTED ACTIONS:

1. Pursuant to CEQA Guidelines Section 15074(b), consideration of the whole of the administrative record, including the Mitigated Negative Declaration, No. ENV-2016-1955-MND (“Mitigated Negative Declaration”), Errata 1 dated March 23, 2017, Errata 2 dated January 16, 2018, and all comments received, the imposition of mitigation measures and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;
2. Pursuant to Los Angeles Municipal Code (LAMC) 12.24 U.26 a Conditional Use to increase the density greater than the maximum permitted in LAMC Section 12.22 A.25, to 57.5 percent over the entire Project Site in order to permit 87 dwelling units, in lieu of 55 dwelling units;
3. Pursuant to LAMC Section 12.24 W.1, a Master Conditional Use to the sale and/or dispensing of a full-line of alcoholic beverages for on-site and off-site consumption for a maximum of three (3) commercial establishments within 6,000 square feet of commercial floor area;
4. Pursuant to LAMC 12.22 A.25(g)(2), the Applicant proposes to set aside 11 units, or 20 percent of the dwelling units as Restricted Affordable Units and requests the following two (2) On-Menu Incentives:
 - a. A 3:1 Floor Area Ratio (FAR) over the entire Project Site, in lieu of the permitted 1:1 FAR in the C4-1D zoned portion of Subarea A and the 2:1 FAR for a Mixed-Use Project in Subarea B; and
 - b. Averaging floor area ratio, density, parking, open space and permitting vehicular access within the C4-1D and R3-1 Zones and Subareas A and B.

5. Pursuant to LAMC Section 12.22 A.25(g)(3), the Applicant requests the following four (4) Off-Menu Incentives from the Vermont/Western SNAP Specific Plan:
 - a. From Section 7.A of the Vermont/Western SNAP Specific Plan to allow seven (7) lots having a combined lot area of 38,276 square feet to be tied together to form a single building site, in lieu of a maximum of two (2) lots having a combined lot area of 15,000 square feet to be tied together to form a single building site for residentially zoned properties in Subarea A;
 - b. From Section 7.B of the Vermont/Western SNAP Specific Plan to allow seven (7) lots having a combined lot area of 38,276 square feet to be tied together to form a single building site, in lieu of a maximum of two (2) lots having a combined lot area of 10,000 square feet to be tied together to form a single building site for commercially zoned properties in Subarea A;
 - c. From Section 8.B.1 of the Vermont/Western SNAP to permit an increase in building height of 60 feet over the entire Project Site, in lieu of the maximum permitted building height of 50 feet for a Mixed-Use Project in Subarea B; and
 - d. From the Vermont/Western SNAP Specific Plan to permit an increase in transitional height over the entire Project Site:
 - i. From Section 7.D of the Vermont/Western SNAP Specific Plan for an increase in height of 16 feet, 2 inches, thereby allowing 60 feet in transitional height, in lieu of 15 feet above the shortest adjacent building or 43 feet ten inches in Subarea A; and
 - ii. From Section 8.C of the Vermont/Western SNAP Specific Plan for an increase in height of 35 feet, thereby allowing 60 feet in transitional height, in lieu of 25 feet required for buildings located within a distance of 0 to 49 feet from an abutting lot in Subarea A; and to permit an increase in height of 27 feet, thereby allowing 60 feet in transitional height, in lieu of 33 feet required for buildings located within a distance of 50 to 99 feet from an abutting lot in Subarea A.
6. Pursuant to LAMC Section 11.5.7, a Project Permit Compliance Review with the Vermont/Western Station Neighborhood Area Plan (SNAP) Transit Oriented District Specific Plan; and
7. Pursuant to LAMC Section 16.05, a Site Plan Review for a project which creates, or results in an increase of 50 or more dwelling units.

Applicant: Damon Porter, Western & Franklin, LLC
 Representative: Craig Lawson, Craig Lawson & Company, LLC

Staff: Mindy Nguyen, City Planner
mindy.nguyen@lacity.org
 (213) 978-1241

11. [CPC-2014-4942-ZC-HD-DB-SPR-WDI](#)

CEQA: ENV-2014-4943-MND
 Plan Area: Wilshire

Council District: 1 - Cedillo
 Last Day to Act: 02-08-18
 Continued from: 12-14-17

PUBLIC HEARING – Completed July 24, 2017

PROJECT SITE: 2501 – 2515 West Olympic Boulevard;
 980 – 992 South Arapahoe Street;
 981 South Hoover Street

PROPOSED PROJECT:

Construction of a new seven-story, mixed-use development consisting of 173 residential units and 34,065 square feet of commercial uses with a total of 262 on-site vehicle parking spaces (201 spaces for residential uses, 61 spaces for commercial uses) located within one ground floor parking level and two

subterranean parking levels, on a Project Site that consists of nine (9) contiguous lots totaling 51,949 square feet in size, and is currently vacant. The building will measure approximately 90 feet in height and contain approximately 183,190 square feet of floor area. As part of this application, the Department of City Planning has initiated a Zone Change and Height District Change from C2-2 to (T)(Q)C2-1 as a technical correction to a recorded mapping error which will create consistency between the Zone designation and the General Plan Land Use designation for the C2 zoned lots.

REQUESTED ACTIONS:

1. Pursuant to CEQA Guidelines Section 15074(b), consideration of the whole of the administrative record, including the Mitigated Negative Declaration, No. ENV-2014-4943-MND (“Mitigated Negative Declaration”), Errata dated November 17, 2017, all comments received, the imposition of mitigation measures and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;
2. Pursuant to Los Angeles Municipal Code (LAMC) Section 12.32 F, a Zone Change and Height District Change from C2-2 to (T)(Q)C2-1;
3. Pursuant to LAMC Section 12.22 A.25(g)(2) a 33 percent Density Bonus for a project reserving 15 percent of the base dwelling units, or 20 units, for Very Low Income Households, in conjunction with Parking Option 1 and the following three (3) On-Menu Incentives:
 - a. Averaging of floor area, density, open space and parking over the Project Site, and to permit vehicular access from a less restrictive zone to a more restrictive zone;
 - b. Seventeen percent reduction in the required depth of the front yard setback along Arapahoe Street, for a 12-foot, 6-inch setback in lieu of the otherwise required 15-foot setback; and
 - c. Twenty percent maximum reduction in the required width of the northerly side yard, for an 8-foot setback in lieu of the otherwise required 10-foot setback.
4. Pursuant to LAMC Section 12.22 A.25(g)(3), an Off-Menu Waiver to allow a 3.90:1 Floor Area Ratio (FAR) for the entire Project Site, in lieu of the otherwise maximum permitted 3:1 FAR for the R4-1 Zone and 1.5:1 FAR for the proposed (T)(Q)C2-1 Zone; and
5. Pursuant to LAMC Section 16.05, Site Plan Review approval for a development project that results in an increase of 50 or more residential units.

Applicant: Shahin Simon Neman, NY Properties, LLC
Representative: James Santa Maria, Santa Maria Group

Staff: Mindy Nguyen, City Planner
mindy.nguyen@lacity.org
(213) 978-1241

12. [CPC-2014-2906-TDR-SPR](#)
CEQA: ENV-2014-2907-MND
Plan Area: Central City
Related Case: VTT-69839-CN

Council District: 14 – Huizar
Last Day to Act: 2-8-18
Continued from 12-14-17

Request from the Applicant to the City Planning Commission to extend the time in which to act on the application and to continue the matter to February 22, 2018. (Motion required)

PUBLIC HEARING – Completed January 26, 2017

PROJECT SITE: 601 South Main Street;
601 – 641 South Main Street;
108 – 114 West 6th Street

PROPOSED PROJECT:

The demolition of an existing surface parking lot, and the construction of a new 38-story, 390-foot, 3-inch tall, mixed-use, high-rise development consisting of 452 residential condominium units and 15 commercial condominium units with 21,514 square feet of commercial space. The project would provide 860 parking spaces within one subterranean level, and six above-grade parking levels.

REQUESTED ACTIONS:

1. Pursuant to CEQA Guidelines Section 15074(b), consideration of the whole of the administrative record, including the Mitigated Negative Declaration, No. ENV-2014-2907-MND (“Mitigated Negative Declaration”), all comments received, the imposition of mitigation measures and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;
2. Pursuant to Section 14.5.6 of the Los Angeles Municipal Code (LAMC), Transfer of Floor Area Rights (TFAR) from the Los Angeles Convention Center (Donor Site) at 1201 South Figueroa Street for the approximate amount of 186,435 square feet, to the project site (Receiver Site) permitting an FAR of 9.1:1 and 551,349 square feet of floor area in lieu of a 6:1 FAR which permits 364,914 square feet of floor area; and
3. Pursuant to LAMC Section 16.05, a Site Plan Review for a project which results in 50 or more residential units.

Applicant: Barry Shy, Sixth and Main, LLC
Representative: Kate Bartolo & Associates

Staff: May Sirinopwongsagon, City Planner
may.sirinopwongsagon@lacity.org
(213) 978-1372

13. [CPC-2017-4556-ZC](#)
CEQA: ENV-2016-2111-ND-REC1
Plan Area: Wilshire

Council District: 4 – Ryu
Last Day to Act: N/A

PUBLIC HEARING – Completed December 19, 2017

PROJECT SITE:

The area consists of the Brookside and Sycamore Square neighborhoods within Council District 4 as shown in the proposed Ordinance Maps. The Brookside area is generally bound by Wilshire Boulevard, Highland Avenue, Olympic Boulevard, and Muirfield Road. The Sycamore Square neighborhood generally consists of properties along Citrus Avenue and Orange Drive in between Wilshire Boulevard and Olympic Boulevard.

PROPOSED ORDINANCE:

As follow-up to Interim Control Ordinance number 184,381, the proposed Zone Change Ordinances will provide more specialized development regulations for single-family dwelling units within the project boundaries identified in the attached proposal utilizing the new “R1 One-Family Variation Zones.” The new zones represent context sensitive zoning meant to preserve the neighborhood character of the individual communities.

REQUESTED ACTIONS:

1. Find that, after consideration of the whole of the administrative record, the project was assessed in Negative Declaration, No. ENV-2016-2111-ND; and pursuant to CEQA Guidelines 15162 and 15164, as supported by the addendum Negative Declaration No. ENV-2016-2111-ND-REC-1 dated January 2018, no major revisions are required to the Negative Declaration; and no subsequent EIR or Negative Declaration is required for approval of the project;
2. Pursuant to Section 12.32 F of the Los Angeles Municipal Code (LAMC) a Zone Change

Ordinance changing those parcels lying within the proposed Brookside Ordinance Map from R1-1 to R1R3-RG and R1V3-RG; and

3. Pursuant to LAMC Section 12.32 F a Zone Change Ordinance changing those parcels lying within the proposed Sycamore Square Ordinance Map from R1-1 to R1V3-RG.

Applicant: City of Los Angeles

Staff: Giselle Corella, City Planning Associate
giselle.corella@lacity.org
(213) 978-1357

14. [CPC-2017-2533-ZC](#)
CEQA: ENV-2017-2534-ND
ENV-2018-224-CE

Council District: 4 – Ryu
Last Day to Act: N/A

Plan Area: Wilshire

PUBLIC HEARING – Completed December 11, 2017

PROJECT SITE:

Seventeen lots zoned [Q]C2-1 and located on South Sycamore Avenue between 4th Street to the north and 6th Street to the south, and located on South Sycamore Avenue, South Orange Drive, and South Citrus Avenue between 6th Street to the north and Carling Way to the south. Lots 37, 279, 280, 283, 284, 361, 362, 337, 338, 339, 340, 341, 342, 343, 344, 345, and 346 in Tract No. 5049, Map Book 54-52, County of Los Angeles.

PROPOSED ORDINANCE:

A Zone Change Ordinance to remove the existing [Q] Condition on the subject properties and replace it with a new [Q] Condition that would limit use of the subject properties to residential development that conforms to the allowable density and development provisions of the R1R3-RG One-Family Rear-Mass Variation Zone and Rear Detached Garage Supplemental Use District, or surface parking areas. The proposed ordinance implements context-sensitive zoning meant to preserve neighborhood character and does not, by itself, propose or authorize any development.

REQUESTED ACTIONS:

1. Pursuant to CEQA Guidelines, Section 15300 after consideration of the whole of the administrative record, the Project is exempt from CEQA pursuant to CEQA Guidelines Section 15305 and Section 15308 and City of Los Angeles Environmental Quality Act Guidelines, Article III, 1(e)(12), and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines Section 15300.2 applies;
2. Pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including the Negative Declaration No. ENV-2017-2534-ND (“Negative Declaration”), and all comments received, there is no substantial evidence that the project will have a significant effect on the environment; Find the negative declaration reflects the independent judgment and analysis of the City; and Adopt the negative declaration; and
3. Pursuant to Section 12.32 F of the Los Angeles Municipal Code, a Zone Change Ordinance establishing a Zone Change to those parcels lying within the project boundaries identified in the proposed Ordinance Map from [Q]C2-1 to [Q]C2-1, changing the text of the [Q] Condition.

Applicant: City of Los Angeles

Staff: Emily Gable, Planning Assistant
emily.gable@lacity.org
(213) 978-1342

The next scheduled regular meeting of the City Planning Commission will be held on:

Thursday, February 22, 2018

Van Nuys City Hall
Council Chamber, 2nd Floor
14410 Sylvan Street
Van Nuys, CA 91401

An Equal Employment Opportunity/Affirmative Action Employer

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate. The meeting facility and its parking are wheelchair accessible. Translation services, sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services must be requested **7 days prior to the meeting** by calling the Planning Commission Secretariat at (213) 978-1300 or by email at CPC@lacity.org.

Appendices – Channel Law Letter

February 12, 2018

Comments On The Environmental Documentation For, And The, Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd (APN 4238-024-900 To 911)

APPENDIX C

Notice of Intent to Adopt the MND (dated 1/8/2018)

1202 DEPARTMENT OF
CITY PLANNING

CITY PLANNING COMMISSION

DAVID H. J. AMBROZ
PRESIDENT

RENEE DAKE WILSON
VICE-PRESIDENT

CAROLINE CHOE
VAHID KHORSAND
JOHN W. MACK
SAMANTHA MILLMAN
MARC MITCHELL
VERONICA PADILLA-CAMPOS
DANA M. PERLMAN

ROCKY WILES
COMMISSION OFFICE MANAGER
(213) 978-1300

CITY OF LOS ANGELES
CALIFORNIA



ERIC GARCETTI
MAYOR

EXECUTIVE OFFICES
200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801

VINCENT P. BERTONI, AICP
DIRECTOR
(213) 978-1271

KEVIN J. KELLER, AICP
EXECUTIVE OFFICER
(213) 978-1272

LISA M. WEBBER, AICP
DEPUTY DIRECTOR
(213) 978-1274

<http://planning.lacity.org>

**NOTICE OF INTENT TO ADOPT
A MITIGATED NEGATIVE DECLARATION**

Public Resources Code Section 21092 and Cal. Code of Regulations Title 14, Section 15072 (the Guidelines for the California Environmental Quality Act) require a local agency to provide a notice of intent to adopt a negative declaration or mitigated negative declaration to the public, responsible agencies, trustee agencies, and the county clerk of each county within which the proposed project is located, sufficiently prior to adoption by the lead agency of the negative declaration or mitigated negative declaration to allow the public and agencies the review period provided under Section 15105 of the Guidelines.

Project Title: Permanent Supportive Housing Ordinance
CPC-2017-3136-CA
ENV-2017-3137-MND

Project Location: Citywide

Pursuant to CEQA Guidelines Section 15072(g)(5), the mitigated negative declaration (MND) does not identify any particular site on any of the lists enumerated under Government Code Section 65962.5, including lists of hazardous waste facilities, land designated as hazardous waste property, and hazardous waste disposal sites, and the information in the Hazardous Waste and Substances Statement required under subdivision (f) of that section. Please see the MND for discussion of the potential for future development under the project to be on a list described in Gov't Code Section 65962.5.

Project Description: An ordinance amending Sections 12.03, 12.04.09, 14.00 and 16.05 of the Los Angeles Municipal Code establishing regulations to facilitate the production of Permanent Supportive Housing, including adopting regulations that define PSH & project eligibility criteria, establish unique development standards for PSH, and facilitate administrative review & approval, as well as modify certain provisions related to height & density, consistent with State Density Bonus Law. The PSH Ordinance would allow for projects to select concessions with respect to Zoning Code, including up to 20% decrease in required setbacks, up to 20% reduction in required open space, up to 20% increase in lot coverage limits, up to 35% increase in FAR and depending on the height district up to a 35% increase in height or one additional story. Additional design requirements include that when adjacent to or across an alley

from an R2 or more restrictive zone, the building's transitional height shall be stepped-back within a 45-degree angle.

Schedule: The City of Los Angeles will receive comments on the proposed mitigated negative declaration beginning January 11, 2018 for 30 days, ending February 12, 2018. The City Council of the City of Los Angeles, as lead agency, will make a determination on the project, following a public hearing to be scheduled. A future public hearing by the Planning and Land Use Management (PLUM) City Council Committee will be scheduled. PLUM Agendas may be found online at <https://www.lacity.org/city-government/calendar>.

Copies of the proposed mitigated negative declaration and all documents referenced in the proposed mitigated negative declaration are available for review during the lead agency's normal business hours at: City of Los Angeles Planning Department, Environmental Review Section, 200 North Spring Street, Room 750, Los Angeles, California 90012. Documents are also available online at the Department of City Planning's website <http://planning.lacity.org/>.

Signature: _____



Date: _____

1/8/2018

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Jamie T. Hall
Channel Law Group, LLP
8200 Wilshire Blvd., Ste 300
Beverly Hills, CA 90211

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Appendices – Channel Law Letter

February 12, 2018

Comments On The Environmental Documentation For, And The, Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd (APN 4238-024-900 To 911)

APPENDIX D

**Los Angeles Times Article: A Plan to House L.A.'s Homeless Residents
Could Transform Parking Lots Across The City**

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A plan to house L.A.'s homeless residents could transform parking lots across the city



By DOUG SMITH FEB 09, 2018 | 3:00 AM



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Vietnam veteran Frank Costa lives in a pedestrian tunnel underneath Parking Lot 731 in Venice. Two non-profits, Venice Community Housing and Hollywood Community Housing Corp., have been selected to develop the lot, with plans for 140 housing units. (Genaro Molina / Los Angeles Times)



In the decades following World War II, when the suburbs were young and the car was king, Los Angeles went on a land-buying spree.

The city bought parcels in every size and shape, demolished any buildings on them and opened parking lots to serve emerging commercial districts.

By the 1970s the buying had mostly stopped, and today these 119 public lots blend into the urban quilt all but indistinguishable from their free-market competitors.

But now the city is cultivating plans that could transform much of that land again, this time from asphalt to multistory apartment buildings to house chronically homeless people.



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Plans are already underway to develop housing on large public lots in Venice and Hollywood, while officials review the rest to determine which could support housing.

Advocates of the conversion see it as more than a solution to homelessness.

"These opportunities ought to be evaluated in terms of the next vision of what the city ought to be," said Eric Moss, the architect on a project that would squeeze 140 units onto the Venice parking lot, along with a parking structure to preserve all the spaces there now. "Those lots belong to a completely different history and a completely different time."

But how many of them ultimately prove viable will depend on many unknowns, among them the reaction of council offices and neighborhood groups and the ingenuity of architects in making the most of parcels that in many cases are small, oddly shaped and represent a prized resource.

"I think we're going backwards," Lincoln Heights real estate broker Steven Koster said about a proposal to


City-owned parking lots

estate broker Steven Kasten said about a proposal to build on lots there. "Merchants are not going to have parking. People are going to move out. It's going to hurt business."

The idea of converting public parking to housing has been around for decades in L.A. but has gained little traction. In the 1980s, Mayor Tom Bradley proposed leasing rights to developers to build multifamily housing, but there was no follow-up.

Northeast-area Councilman Gil Cedillo revived the idea in 2008 with a plan to build 80 units on three city lots near the Gold Line in Highland Park.

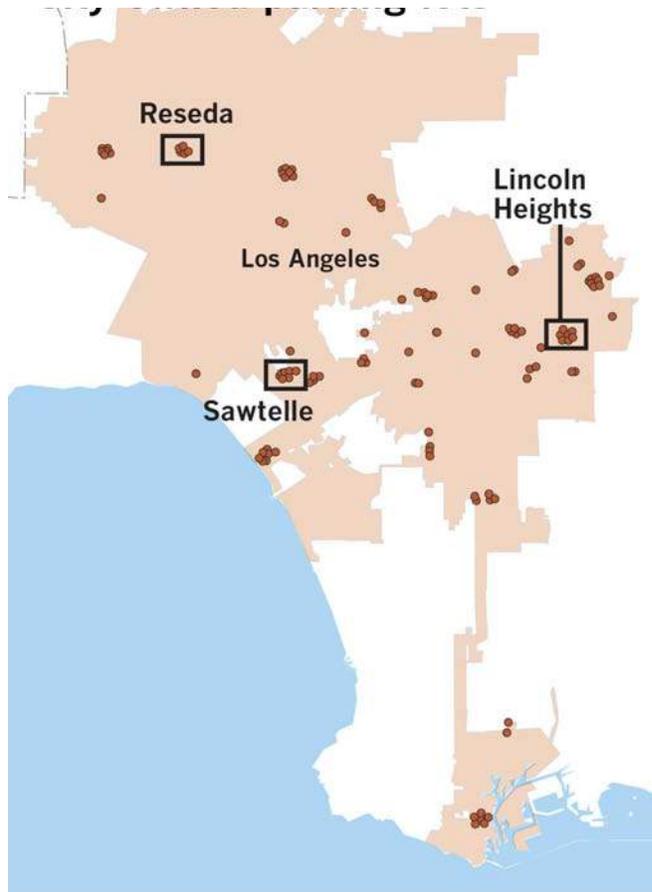
That plan fell into limbo after a neighborhood group, Friends of Highland Park, sued, alleging the environmental review approved by the city was inadequate. A trial court's ruling for the city was overturned on appeal. The city chose not to appeal further, and the project remains stalled.

The new parking lot review grew out of an urgency to implement Proposition HHH, the \$1.2-billion bond measure approved by the voters to help fund the construction of 1,000 permanent supportive housing units each year.



swaying palm trees and idling traffic, living under freeways, alongside riverbeds and on canyon hillsides. The mentally ill, the drug addicts, the economically disadvantaged, many with their life belongings in a backpack or shopping cart. In this ongoing series, Without a Home, The Times is examining the crisis of homelessness in our region.

After sifting through more than 500 prospects, the City Administrative Office has narrowed the field to 129 sites that are potentially large enough and in suitable zones. All but 10 are public parking lots.



Sources: Los Angeles City Administrative Office, Los Angeles Department of Transportation, Los Angeles County Assessor. Graphics reporting by Doug Smith

Paul Duginski / @latimesgraphics

With taxpayer funds now committed, a new obstacle emerged. The scarcity of suitable land in the city's highly competitive real estate market could add years to the start-up time for new projects.

Mayor Eric Garcetti and the City Council have promised the city would speed up construction by providing land from its portfolio of surplus property.

Sawtelle

Seven lots totaling 78,000 square feet are clustered around Santa Monica Boulevard west of the 405 Freeway. They produced \$224,523 in revenue in the last fiscal year.



Sources: Mapzen, OpenStreetMap, Times reporting

Paul Duginski / @latimesgraphics

The city's Housing and Community Investment Department is also planning to offer affordable housing developers 24 city-owned lots, most acquired from the Community Redevelopment Agency when it was dissolved by the state in 2012.

Combined, the properties could support thousands of new units. Some would go to low-income renters, whether they are homeless or not. But even if only half the units were set aside for homeless people, that would make up a substantial boost to the 10-year building goal.

But the hope that using city properties would dramatically speed the pace of construction is being tested by the realities of city procedures.

Yolanda Chavez, an assistant city administrative officer, said the office is reviewing lots a few at a time and will confer with the Department of Transportation to determine their suitability and the number of spaces that need to be preserved.

Then a motion from the City Council office is required to proceed with a planning report. After that the lot can be offered for bidding.

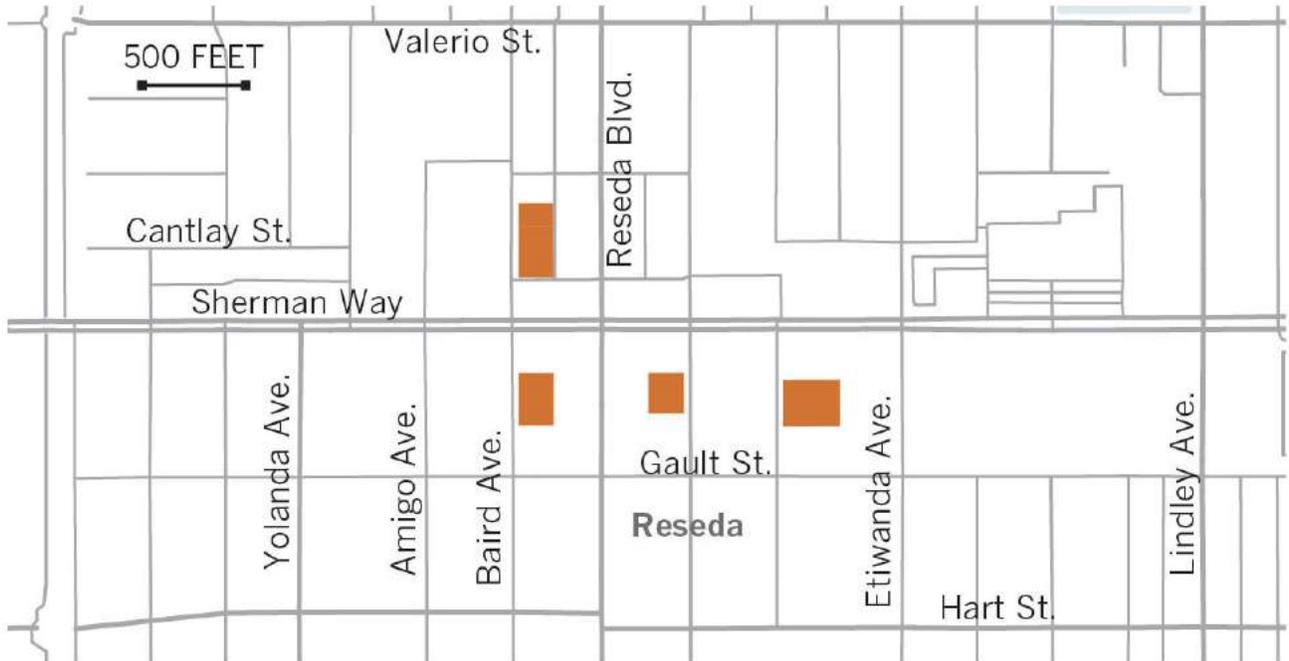
Chavez said she hopes to offer several properties for proposals in February and then a few more twice a year.

Because the process incurs costs, such as appraisal fees, Chavez said she requires a show of support from a City Council member in the form of a motion before she will begin it.

Though there are city parking lots in almost every council district, only a handful of motions have been introduced so far.

Reseda

Lots totaling 128,900 square feet are clustered around Sherman Way. None produce revenue.



Sources: Mapzen, OpenStreetMap, Times reporting

Paul Duginski / @latimesgraphics

A Times survey of dozens of lots showed challenges unique to each.

The smallest, with only seven spaces on West Washington Boulevard in Mid-City, is among a few that may simply be too small for multistory buildings. The largest is unlikely to be replaced by housing. It is a structure with more than 3,000 spaces built into the Dolby Theatre complex in Hollywood, and generates \$12 million a year in revenue.

Most are on side streets a block from major suburban boulevards and serve one- or two-story commercial buildings.

Architects will have to design three- to five-story buildings that blend with both the businesses and with adjoining residential neighborhoods.

About two-thirds of the lots are metered and bring revenue to the city.

The amount of parking to be replaced would have to be decided case by case.

Because many of the lots are in clusters, there are opportunities for creative planning. Replacement parking could be built on one lot, for example, with housing on other ones nearby.

In almost every case, the scale of the project would change the character of a neighborhood, potentially bringing new life to aging business districts, but almost certainly stirring opposition in some. The strategy is getting its first test in Venice.





Rebecca Dannenbaum peers out from the pedestrian tunnel where she and other homeless people have been living in Venice.



A couple walk through Parking Lot 731 in Venice, where 140 housing units could be built on either side of the historic canal.



Vietnam veteran Frank Costa lives in a pedestrian tunnel underneath Parking Lot 731 on Pacific Avenue in Venice. (Photographs by Genaro Molina / Los Angeles Times)

Parking Lot 731, spanning the Grand Canal, provides 188 spaces in a parking-tight district where bohemian businesses, struggling artists and owners of multimillion-dollar homes mix only two blocks from the beach. It pulls in more than \$1 million a year for the city.

Two nonprofits, Venice Community Housing and Hollywood Community Housing Corp., have been selected to develop the lot, with plans for 140 housing units in two buildings on either side of the historic canal.

The project is required to preserve all the public parking, with an additional 143 spaces for the tenants and retail, said Venice Community Housing executive director Becky Dennison.

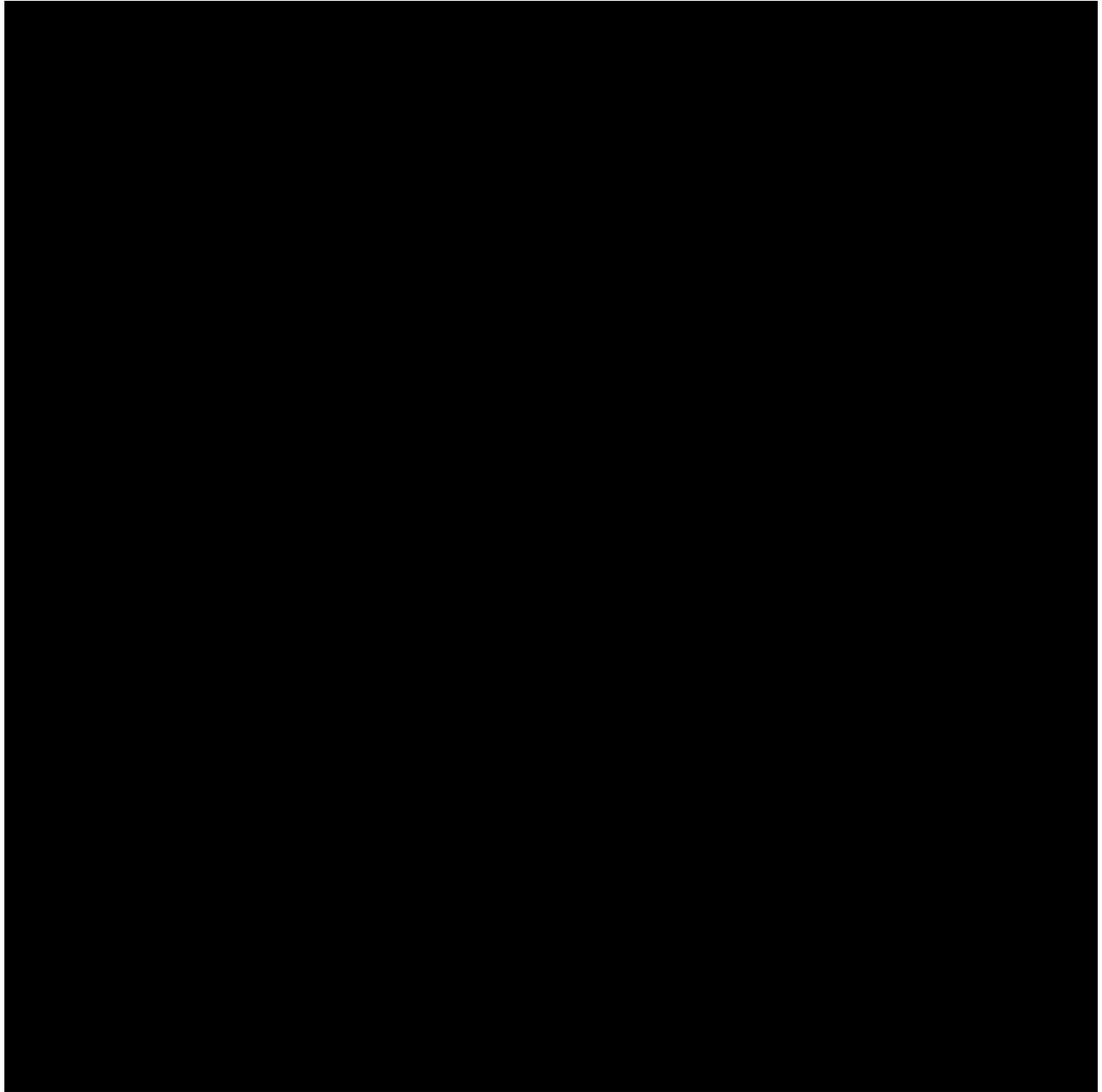
Preliminary designs by Eric Owen Moss Architects show the parking in two multistory structures encircled by the

living spaces and retail — a configuration made possible by the size of the property, at 121,000 square feet one of the city's largest parking lots.

The plan has yet to be formally presented to the community, but preliminary plans released last year stirred opposition from some community groups.

Moss said capturing the spirit of Venice is his challenge as he is "working carefully within a height limit, working carefully within a unit count, reconstitution of the canal, public sense of obligation to retail and art walks. We're fitting all of those intelligently onto the site."

Safran & Associates, a for-profit developer, has been selected to develop affordable housing on a lot on Wilcox Avenue in Hollywood, across the street from the high-end Dream Hollywood hotel.



Two men walk through the parking lot at 1637 North Wilcox Avenue in Hollywood. Safran & Associates, a for-profit developer of affordable housing, has been selected to develop the lot which rests across the street from the high-end Dream Hollywood hotel. (Genaro Molina / Los Angeles Times)



Tyler Monroe, Safran's vice president for development, said plans for the 45,000-square-foot lot are not set but

will preserve the existing 149 spaces.

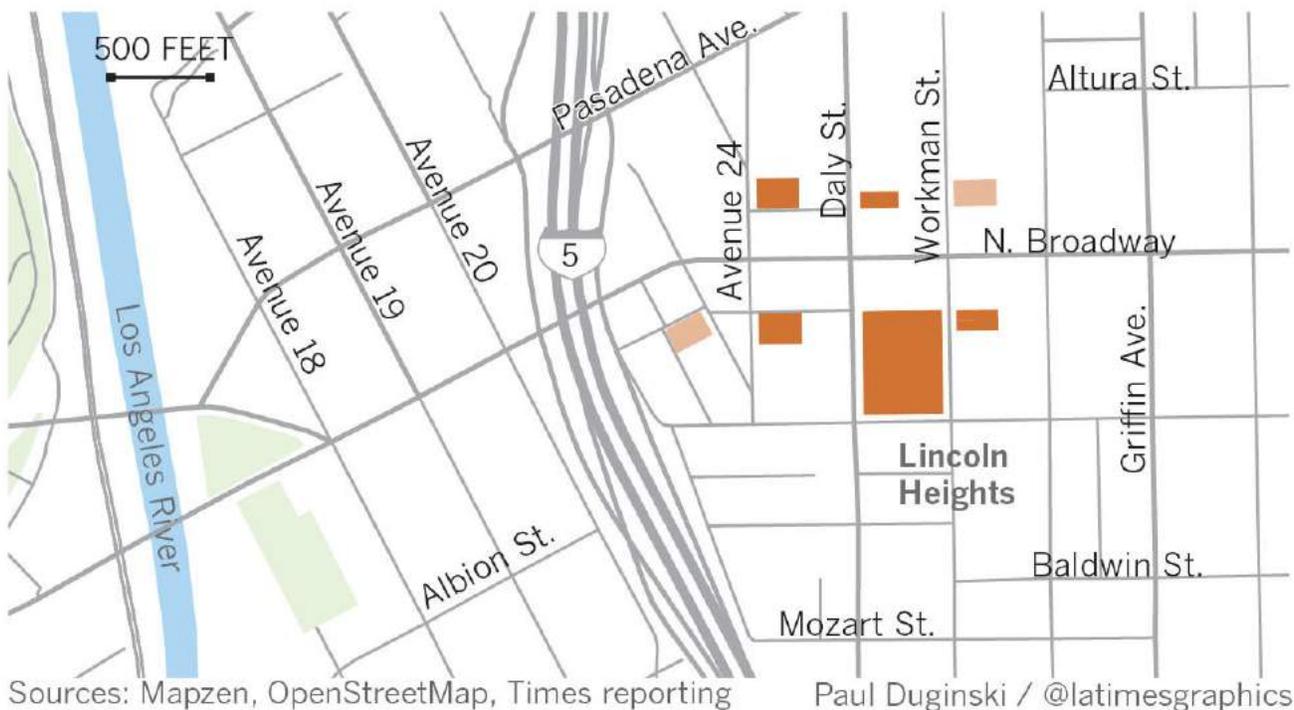
Because they are so large, the Venice and Hollywood lots are among the least challenging for designers.

Across the city, seven smallish lots scattered around North Broadway in Lincoln Heights may set the tone for how the program will unfold in other aging commercial centers, including Echo Park, Van Nuys, Reseda, Canoga Park and Sawtelle.

The lots are not financial assets for the city. Three offer free parking, and the others generate only hundreds of dollars a year per space, compared with thousands for more-productive lots.

Lincoln Heights

Lots totaling 132,180 square feet are clustered around North Broadway. A nonprofit development team is preparing plans for five of the lots. They produced \$94,214 in revenue in the last fiscal year.



Collectively they provide a large building space, but it is cut into inconveniently small pieces. The smallest is only 10,000 square feet.

Cedillo, the area's councilman, has proposed to offer five of the seven lots for housing. But community reaction could be critical.

At a January meeting of the Lincoln Heights Neighborhood Council, a field deputy for Cedillo faced more than 100 residents who were upset that two developers — WORKS, a northeast L.A. nonprofit, and the for-profit GTM Holdings — were given an exclusive negotiating agreement to build on the lots without public input.

The deputy, Jose Rodriguez, told the residents they would be able to work with the developer to design the plan.

Channa Grace, the president and chief executive of WORKS, said she expects the project to include senior housing

and other affordable housing and some replacement parking, in addition to permanent supportive housing for homeless people.

"We're looking to have a robust outreach and get input from the community," Grace said. "Take what we find and go out into the community. Talk to folks, see what they're thinking."

Some who attended the neighborhood council meeting expected those talks to be tough.

"There is no warmth for this project right now from this community," said Lincoln Heights resident and political blogger Scott Johnson.

doug.smith@latimes.com

Twitter: [@LATDoug](https://twitter.com/LATDoug)



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Senior writer Doug Smith scouts Los Angeles for the ragged edges where public policy meets real people, combining data analysis and gumshoe reporting to tell L.A. stories through his 45 years of experience covering the city. As past database editor from 2004 through 2015, he hunted down and analyzed data for news and investigative projects. Besides "[Grading the Teachers](#)," he contributed to investigations of construction abuse in the community college system and the rising toll of prescription drug overdoses. Smith has been at The Times since 1970, covering local and state government, criminal justice, politics and education. He was the lead writer for Times' coverage of the infamous North Hollywood shootout, winner of a 1997 Pulitzer Prize. Between 2005 and 2008, Smith made five trips to Iraq on loan to our foreign desk.

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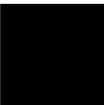
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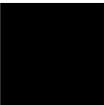
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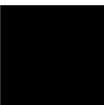
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Channel Law Group, LLP

8200 Wilshire Blvd.
Suite 300
Beverly Hills, CA 90211

Phone: (310) 347-0050
Fax: (323) 723-3960
www.channellawgroup.com

JULIAN K. QUATTLEBAUM, III *
JAMIE T. HALL **
CHARLES J. McLURKIN

Writer's Direct Line: (310) 982-1760
jamie.hall@channellawgroup.com

*ALSO Admitted in Colorado
**ALSO Admitted in Texas

February 12, 2018

VIA ELECTRONIC MAIL

City Council, Planning and
Land Use Management Committee
Department of City Planning,
City Hall - Room 763,
200 North Spring Street,
Los Angeles CA 90012

Via email: darlene.navarrete@lacity.org
and: cally.hardy@lacity.org

**Re: Comments On The Environmental Documentation For, And The,
Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-
3137) And Proposed Redevelopment Of Venice Dell Pacific Site Located At
125 E. Venice Blvd (APN 4238-024-900 To 911)**

Dear City Council Members:

This firm represents Venice Vision with regard to the proposed development at 125 E. Venice Boulevard as well as the Permanent Supportive Housing Ordinance (PSH Ordinance) proposed by the City of Los Angeles (City). This is our firm's third comment letter on the PSH Ordinance and associated environmental documents. We previously submitted letters on October 30, 2017 and December 20, 2017. Three letters have been necessitated by the City's flawed California Environmental Quality Act (CEQA) and project review process. Our previous two letters are incorporated herein by reference and included in **Appendix A**. We again request responses to all three of our letters.

This letter addresses both the continuing defects in the City's CEQA process regarding the PSH Ordinance, and defects in the November 27, 2017 Mitigated Negative Declaration (MND) re-circulated, without change, for public review and comment from January 11, 2018 to February 12, 2018. The November 27, 2017 MND was originally circulated for an inadequate 21-day comment period from November 30, 2017 to December 20, 2017. It appears that after we pointed out a number of serious defects in the City's process, including the failure to circulate the MND for the required 30-day period, that the City has responded by recirculating, without change, the November 27, 2017 MND. The re-circulated MND therefore does not respond to or

address any of the public comments received during the MND’s original and inadequate 21-day comment period, including Channel Law’s comments. All of the letters received during both this comment period and the original 21-day comment period should be presented to the City Council Planning and Land Use (PLUM) Committee, along with responses to comments. It should be noted that re-circulation of the MND only addresses two of the many failings of the City’s process.

1. PROCEEDURAL ISSUES - THE CITY’S PROCESS FOR REVIEWING AND APPROVING THE PERMANENT SUPPORTIVE HOUSING ORDINANCE IS FATAALLY FLAWED

The City has engaged in a confusing and fatally flawed process regarding the adoption of the PSH Ordinance, which has hampered meaningful public participation in the process.

1.1 The City Conducted Public Hearings and Ended The Comment Period On The Ordinance On October 30, 2017 Prior to Release of the MND

The City released the PSH Ordinance for a 60-day comment period beginning on August 31, 2017 and ending on October 30, 2017. On October 30, 2017 Channel Law provided the City with comments on the Permanent Supportive Housing (PSH) Ordinance, including comments on:

- The lack of availability of a CEQA document during the public review period for the PSH Ordinance;
- The inaccurate project description provided as part of the answers to the Frequently Asked Questions attached to the Notice requesting comments on the PSH Ordinance;
- The failure of the PSH Ordinance Notice to disclose the creation of a new CEQA exemption;
- The inadequate project description resulting from failure to describe the number and location of PSH developments;
- The inadequate requirement for the provision of supportive services, and its potential to result in environmental consequences; and,
- The need to address the potential for growth-inducing impacts, cumulative impacts, and increased water demand.

Channel Law’s October 30, 2017 comment letter is incorporated herein by reference and included in **Appendix A** to this letter. Channel Law asked a number of questions regarding the PSH Ordinance and also made the following suggestions regarding ways to amend the PSH Ordinance in that letter, including:

- Remove the new CEQA exemption for PSH projects; instead the existing CEQA low-income housing exemption should be applied.
- Include language in the Ordinance to make clear that pursuant to CEQA Guidelines Section 15268(d) where a PSH project involves an approval that contains elements of both a ministerial action and a discretionary action, the project will be deemed to be discretionary and will be subject to the requirements of CEQA.
- Allow for automatic rezoning of only those parcels addressed in the environmental document for the proposed Ordinance, or specifically addressed in the environmental document for the applicable area plan.

- Add requirements for provision of an appropriate level of supportive services to be maintained over the life of individual PSH projects

Channel Law has not received responses to our questions or comments. Channel Law's comment letter was not included in the December 14, 2017 Staff Report and agenda packet for the Planning Commission. Furthermore, Channel Law's comments and suggestions were largely ignored, and were not adequately addressed in the December 14, 2017 Planning Commission Staff Report, including the following Exhibits to the Staff Report:

- A - Proposed Permanent Supportive Housing Ordinance
- B - Environmental Clearance
 - B.1 Mitigated Negative Declaration
 - B.2 Addendum to the SCAG 2016-2040 RTP/SCS PEIR, SCH No. 2015031035
- C - Affordable Housing Opportunity Sites

Channel Law was not able to provide comments on the MND for the project during the 60-day comment period on the Ordinance, because the MND was not released until November 30, 2017. During the 60-day comment period, staff held two public hearings on the PSH Ordinance, on: September 25, 2017 and September 28, 2017. The comment period on the Ordinance thus ended a month before the City's November 30, 2017 release of the MND for the project.

The failure to provide the public with the MND for the PSH Ordinance until one month after the close of the public comment period on the PSH Ordinance inappropriately limited public comment on the PSH Ordinance, in violation of Public Resources Code (PRC) Section (§) 21003.1 and CEQA Guidelines §15004 which states:

- (b) Choosing the precise time for CEQA compliance involves a balancing of competing factors. EIRs and negative declarations should be prepared as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment.

...

- (c) The environmental document preparation and review should be coordinated in a timely fashion with the existing planning, review, and project approval processes being used by each public agency. These procedures, to the maximum extent feasible, are to run concurrently, not consecutively. When the lead agency is a state agency, the environmental document shall be included as part of the regular project report if such a report is used in its existing review and budgetary process.

Channel Law commented in our October 30, 2017 letter on the fact that failure to provide the public with a copy of the CEQA document during the public review period inhibited the ability of the public to comment on, or fully understand, the potential impacts of the proposed PSH Ordinance. In addition, requiring the public to separately comment on the PSH Ordinance

and then subsequently on the MND for the project, unduly burdened the public, since as noted in the Channel Law letter, a full description of the components and sites affected by the PSH Ordinance was not made available to the public during the comment period on the Ordinance.

1.2 The Planning Commission Made Changes To The PSH Ordinance After the MND Was Released For Comment

According to the Staff Report for the December 14, 2017 Planning Commission hearing on the PSH Ordinance, the City has made the following changes to the August 30, 2017 version of the PSH Ordinance, which was the version available to the public at the time the MND was released:

- References were added to State Density Bonus law to make clear that the ordinance is intended to create permanent supportive housing units consistent with state density bonus provisions. This revision ensures that the grant of any bonuses, incentives, or concessions under this ordinance shall not be considered an increase in density or other change which requires any corresponding zone change, general plan amendment, specific plan exception, or discretionary action. This does not supersede or in any way alter or lessen the effect or application of the Coastal Act.
- To ensure general plan land use consistency, the amendment to the PF Zone was revised to allow the application of the least restrictive adjacent zone, in lieu of the least restrictive zone within 1/4-mile radius of the project site.
- To more closely align with other incentives, a modification was made to allow for up to 20% relief in any other development standard not already specified, in lieu of 35% relief.
- The construction standards were revised to be more consistent with Mitigation Measures included in the Mitigated Negative Declaration prepared for the ordinance.
- The definition of a Qualified PSH Project was amended to reflect recent changes to definitions for project funding requirements under Measure HHH and ensure that these requirements are in alignment.
- The setback incentive was revised to respect prevailing front yards in residential zones.
- To further ensure high quality, pedestrian-scale design, additional design standards were added related to screening of parking structures.

While we are generally supportive of these changes, the modified PSH Ordinance was not made available to the public for comment concurrent with the release on the MND for the PSH Ordinance.

1.3 The Planning Commission Took Action on the Project on December 14, 2017 Prior to The Close of the MND Comment Period On December 20, 2017

The PSH Ordinance was considered by the Planning Commission on December 14, 2017, prior to the close of the 20-day comment period on the MND on December 20, 2017. At the Planning Commission hearing, recommended actions included (See **Appendix A, Attachment 2 – Audio Links Item 12**):¹

¹Item CPC-2017-3409-CA <https://planning.lacity.org/InternetCalendar/pdf.aspx?Id=59215> See Attachment 2 – Item 12 with a link to the Audio of hearing: <https://planning.lacity.org/InternetCalendar/pdf.aspx?Id=59322>
<http://planning.lacity.org/StaffRpt/Audios/CPC/2017/12-14-2017/13%20CPC-2017-3409.mp3>

- RECOMMENDED ACTIONS:
1. **Recommend** adoption of the proposed ordinance (Exhibit A);
 2. **Adopt** the staff report as the Commission report on the subject;
 3. **Adopt** the attached Findings;
 4. **Recommend** that the City Council FIND that pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including Mitigated Negative Declaration No. ENV-2017-3137-MND ("Mitigated Negative Declaration-) (Exhibit B.1), and all comments received, with imposition of mitigation measures, there is no substantial evidence that the project will have a Significant effect on the environment; FIND the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; FIND the mitigation measures have been made conditions on the project; and ADOPT the Mitigated Negative Declaration; and
 5. **Recommend** that the City Council FIND, based on their independent judgment, after consideration of the whole of the administrative record, including the SCAG 2016-2040 RTP/SCS PEIR, SCH No. 2015031035, certified on April 7, 2016 (EIR) and the Addendum prepared for the Permanent Supportive Housing Ordinance (Addendum) (Exhibit B.2), the project was assessed in the EIR and pursuant to the CEQA Guidelines, Sections 15162 and 15164 and the Addendum that no major revisions to the EIR are required and no subsequent EIR or negative declaration is required for approval of the project.

The Planning Commission took the actions recommended by Staff. As noted in the Letter of Determination dated December 19, 2017 for the PSH Ordinance included in **Appendix A, Attachment 2**, the Planning Commissions actions included the following finding (emphasis added):

1. Found pursuant to CEQA Guidelines Section 1507 4(b), after consideration of the whole of the administrative record, including Mitigated Negative Declaration No. ENV-2017- 3137-MND (Mitigated Negative Declaration), **and all comments received**, with imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; Found that the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; Found the mitigation measures have been made enforceable conditions on the project; and adopt the Mitigated Negative Declaration; and Adopted the Mitigated Negative Declaration and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;

...

4. Approved and recommended that the City Council adopt the proposed ordinance, as amended by the Commission, subject to review by the City Attorney as to form and legality; and
5. Adopted and recommended that the City Council adopt the attached Findings.

The Planning Commission's findings contain an untruth. The Planning commission could not have considered comments on the MND before approving the ordinance, since the Planning Commission acted before completion of the public comment period on the MND. This is a violation of CEQA Guidelines § 15004(b), which states:

- (2) To implement the above principles, public agencies shall not undertake actions concerning the proposed public project that would have a significant adverse effect or limit the choice of alternatives or mitigation measures, before completion of CEQA compliance. For example, agencies shall not:
 - (A) Formally make a decision to proceed with the use of a site for facilities which would require CEQA review, regardless of whether the agency has made any final purchase of the site for these facilities, except that agencies may designate a preferred site for CEQA review and may enter into land acquisition agreements when the agency has conditioned the agency's future use of the site on CEQA compliance.
 - (B) Otherwise take any action which gives impetus to a planned or foreseeable project in a manner that forecloses alternatives or mitigation measures that would ordinarily be part of CEQA review of that public project.

In addition to adopting findings regarding the MND, the Planning Commission also considered and approved use of a second environmental document for the project, an Addendum to the Program Environmental Impacts Report (PEIR) for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by the Southern California Association of Governments (SCAG).² This was clearly done in an effort to provide cover for the City's failure to both prepare an adequate MND for the project and to comply with MND process requirements specified in CEQA. This was included in the Planning Commission packet as a separate environmental document for the PSH Ordinance. The use of an Addendum was no doubt done in order to further frustrate the ability of the public to review and comment on the environmental document for the project, since an Addendum need not be circulated for public review. According to the Planning Commission's Letter of Determination included in **Appendix A, Attachment 2**, Planning Commission then took the following action at its December 14, 2017 meeting:

At its meeting of December 14, 2017, the Los Angeles City Planning Commission took the actions below in conjunction with the approval of the proposed ordinance: . . .

² A copy of the PEIR is available at: <http://scagrtpscs.net/Pages/DRAFT2016PEIR.aspx>
Copies of the SCAG's two Addendums are available at:
<http://scagrtpscs.net/Pages/FINAL2016PEIR.aspx>
<http://scagrtpscs.net/Pages/2016RTPSCSAmendments.aspx>

2. Approve and recommend that the City Council find, based on their independent judgement, after consideration of the whole of the administrative record, including the SCAG 2016-2040 RTP/ SCS PEIR (SCH No. 2015031035), certified on April 7, 2016 (EIR) and the Addendum prepared for the PSH Ordinance (Addendum), the project was assessed in the EIR and pursuant to the CEQA Guidelines, Sections 15162 and 15164 and the Addendum that no major revisions to the EIR are required and no subsequent EIR, or negative declaration is required for approval of the project;

Based on a review of subsequent Planning Commission meeting minutes (see **Appendix B**), it does not appear that the Planning Commission has rescinded its findings, despite the untruth contained therein.

1.4 Failure to Address Channel Law's December 20, 2017 Comments Regarding Procedural and Substantive Defects in the November 27, 2017 MND Circulated For Public Review and Comment From November 30, 2017 to December 20, 2017 and Associated Process

The MND for the PSH Ordinance was released for public review and comment on November 30, 2017 for a 21-day period ending December 20, 2017. As we noted in our comment letter on the MND dated December 20, 2017 incorporated herein by reference and included as **Appendix A**, there were a number of procedural and substantive defects in the MND and MND process:

1. Despite the fact that the project was of area-wide significance, the City circulated the MND for only 21-days, rather than the 30-days required for a project of area-wide significance by CEQA.
2. Violation of CEQA Guidelines § 15072(b) - The City Failed To Provide The Notice As Required By CEQA To Channel Law
3. The City's Notice of Intent to Adopt the MND Failed to Comply with the Noticing Requirements of CEQA Guidelines Section 15070(g)
4. The City and Planning Commission Findings Inappropriately Relied In-Part On An Addendum Prepared By The City to An EIR Prepared By Another Agency
5. Use Of Both An MND and Addendum For The Same Project Is Inappropriate
6. Addendum Process For the Addendum Presented to the Planning Commission Failed To Comply With CEQA
7. Violation of CEQA Guidelines §15153 – Use Of An EIR From an Earlier Project
8. If the City was Going to Hide Behind the TRP/SCS PEIR The City Should Have Tiered Off the RTP/SCS PEIR Rather Than Prepared an Addendum to the RTP/SCS PEIR
9. The Planning Commission Staff Report and MND Provide Unclear and Conflicting Information Regarding Application of the PSH Ordinance to the Venice Dell Pacific Site and the Thatcher Yard Site
10. Inadequate Project Description – Failure to Identify All Potential PSH City Owned Land
11. Inadequate Analysis of Impact on Crime and Public Services
12. Inadequate Analysis of Impact on Property Values and Resulting Physical Changes
13. Inadequate Analysis of Increase in Water Demand
14. Need for Analysis of Growth Inducing Impacts
15. Failure to Address Potential for Cumulative Impacts

Since the MND that has been re-circulated for public review and comment is the same November 27, 2017 MND originally circulated for public review and comment, it does not address the substantive issues identified in our December 20, 2017 comment letter. While re-circulation addresses the first two of our concerns and the revised Notice of Intent to Adopt addresses several of the noticing defects we identified in our comment letter, our remaining concerns have not been addressed.

1.5 Failure To Rescind Planning Commission Findings Despite Falsehood Contained In Those Findings

As we explained in our December 20, 2017 comment letter, the City did not proceed in the manner prescribe by law regarding the environmental documentation for the PSH Ordinance and the Planning Commission's findings, approval and recommendation of those documents. The City therefore needed to take the following actions:

- Void the actions taken by the Planning Commission regarding the PSH Ordinance and the associated environmental documents;
- Prepare a single environmental document for the PSH Ordinance and circulate that document for public review in accordance with the requirements for projects of area-wide significance;
- Provide Notice of the Availability of the revised document to all those who have comment on the environmental documents or the PSH Ordinance, including Channel Law.
- Allow the Planning Commission to reconsider the re-circulated MND and issue new findings.

While the City has re-circulated the November 27, 2017 MND for public review and comment, neither the Notice of Intent to Adopt (included as **Appendix C** to this letter), or minutes from any Planning Commission meetings after its December 14, 2017 actions on the MND and Addendum thorough the release of the re-circulated November 27, 2017 MND (**Appendix B**), indicate that the Planning Commission has voided its inappropriate findings, approvals and recommendations regarding the PSH Ordinance. Furthermore, there is no indication in the Notice that the City intends for the November 27, 2017 MND to be the sole environmental document for the proposed project. Our objections to the use of an Addendum included in our December 20, 2017 letter remain, and are incorporate herein by reference and detailed in **Appendix A** to this letter.

1.6 Problems With The City's January 8, 2018 Notice of Intent to Adopt the MND

The revised Notice of Intent to Adopt the MND (Mitigated Negative Declaration-NG-17-140-PL: ENV-2017-3137) received by Channel Law is included as **Appendix C** to this letter. There are several problems with the Notice. First, the Notice does not specify where comments are to be sent. While not specifically required by CEQA Guidelines § 15070(g), this information is common sense and is necessary for a City like Los Angeles, which is very large, and has an unusual planning and city council subcommittee structure. Unlike smaller cities, it is not clear where comments should be sent. Should they be sent to the Planning Department Environmental Review Unit, or to the City Clerk, given that the next step in the process, per the Notice, is the Council's PLUM committee?

Second, statements in the Notice create a misperception regarding the potential for particular sites potentially affected by the ordinance to be on any lists enumerated under Government Code Section 65962.5. The Notice states:

Pursuant to CEQA Guidelines Section 15072(g)(5), the mitigated negative declaration (MNO) does not identify any particular site on any of the lists enumerated under Government Code Section 65962.5, including lists of hazardous waste facilities, land designated as hazardous waste property, and hazardous waste disposal sites, and the information in the Hazardous Waste and Substances Statement required under subdivision (f) of that section.

However, the MND identifies the potential for PSH sites to be included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and includes a mitigation measure to address this.³ The environmental Notice published by the City fails to identify this, per CEQA Guidelines § 15070(g)(5). The Notice is therefore still deficient.

2. SUBSTANTIVE ISSUES - COMMENTS ON THE ENVIRONMENTAL DOCUMENTS FOR THE PSH ORDINANCE

2.1 Project Splitting – Failure to Analyze The Whole of the Action – Production of PSH Housing Per City’s Comprehensive Homeless Strategy

CEQA Guidelines Section 15003(h) requires: “The lead agency must consider the whole of an action, not simply its constituent parts, when determining whether it will have a significant environmental effect. (*Citizens Assoc. For Sensible Development of Bishop Area v. County of Inyo* (1985) 172 Cal.App.3d 151).” The City has failed to comply with this requirement when analyzing the proposed project, which should be defined as the City’s provision of housing for the homeless, including PSH units. As noted on page II-17 of the MND:

101-1

The PSH Ordinance would streamline the development process for PSH units including streamlining the environmental review process, expediting the permit process and by removing zoning hurdles.

According to page II-4 of the MND:⁴

³ MND pages III-5 and IV-37 to IV-39.

⁴ The footnotes (fn) in the MND for the quoted passage are:

2 Comprehensive Homeless Strategy, City of Los Angeles, 2015

http://clkrep.lacity.org/onlinedocs/2015/15-1138-SI_misc_I-7-16.pdf

3 Affordable Housing Cost Study, Analysis of the Factors that Influence the Cost of Building Multi-Family Affordable Housing in California, The California Department of Housing and Community Development, the California Tax Credit Allocation Committee, the California Housing Finance Agency, and the California Debt Limit Allocation Committee, October 2014
https://www.novoco.com/sites/default/files/a_toms/files/ca_development-cost-study_101314.pdf

4 On July 1, 2016, Governor Brown signed legislation enacting the No Place Like Home program to dedicate \$2 billion in bond proceeds to invest in the development of permanent supportive housing for persons who are in need of mental health services and are experiencing homelessness, chronic homelessness, or who are at risk of chronic homelessness.

The City's Comprehensive Homeless Strategy(fn2) identified a need to build at least 1,000 PSH units per year, an increase of up to 700 units from its current average production rate of approximately 300 units per year. Lack of adequate funding has been the primary barrier to achieving this goal. Exacerbating this constraint is the extent to which PSH projects often require lengthy planning entitlement and processing times, where project costs are driven up and construction completion may be delayed as long as one to two years.(fn3)

A number of new dedicated funding sources have recently been approved at the state and local levels:

- \$2 billion bond in the California "No Place Like Home" initiative;⁴
- \$1.2 billion local (City of Los Angeles) bond measure (Measure HHH) approved in November 2016, generated over a period of ten years;
- County-wide Measure H, approved in March 2017, provides a 0.25 percent sales tax which could generate \$355 million annually for ten years to fund homeless services and prevention, including rental subsidies and supportive services associated with PSH.

These revenue streams will help close the funding gap for supportive housing. Based on historical gap-funding sources and construction trends, the City anticipates that these funding sources will contribute to the production of 1,000 new PSH units per year, over a period of ten years.

According to page II-12 of the MND:⁵

The City estimates of the number of PSH units necessary to close the gap between what is available and what is needed to house the existing homeless population is approximately 9,050 PSH units for singles and 845 units for families.(fn12) PSH for single individuals represents the highest need the City is facing relative to the housing gap for the City's homeless. Housing current numbers of Los Angeles homeless singles will require more than doubling the current PSH supply. It is anticipated that recently adopted local gap-funding sources (Measure HHH and Measure H) will help meet the need for PSH by generating a total of 10,000 units of PSH.

However, according to page II-5 of the MND:

Based on this study, and due to the fact that the construction of PSH is constrained by the availability of public funding, it is reasonably foreseeable that the Proposed PSH Ordinance could, with the most generous assumptions (and conservative for purposes of environmental review), result in the construction of an additional 200 units per year of PSH in addition to the 1,000 units per year anticipated to result from Measure HHH and other previously approved gap-funding projects. Therefore, for purposes of the City's analysis of the PSH

⁵ Footnote 12 in the MND states:

12 Comprehensive Homeless Strategy, City of Los Angeles, 2015
http://clkrep.lacity.org/online/docs/2015/15-1138-SI_misc_1-7-16.pdf

Ordinance in this MND, the City is analyzing the impacts of construction and operation of 2,000 units constructed over a 10-year period (200 units/year). Construction of the other 10,000 or 1,000 units a year for the next 10 years is part of the cumulative development allowed by the previously approved gap funding projects, identified above.

The MND does not make clear why the PSH Ordinance would only apply to 200 units per year, and not the full number of PSH units anticipated as a result of gap funding. According to pages II-17-II-18 of the MND (emphasis added):

The City's method to estimate the 200 units a year potentially resulting from the PSH Ordinance is consistent with CEQA legal decisions that recognize that a City is not required to reanalyze the effect of ordinances or other projects that are **already approved** and are not being amended or are intended to be amended with the project. See, e.g., *Black Property Owners Assn. v. City of Berkeley* (1984) 22 Cal.AppAth 974, 985 (holding that a city was not required to analyze the effects of a rent control ordinance in its update to its housing element where there were no changes proposed to its rent control laws). Again, **Measure HHH, along with other previously approved cumulative gap-funding projects, are existing projects that will foreseeably result in the construction of up to 1,000 units a year for the next 10 years.** (See discussion above related to historical construction of 300 PSH units a year and cumulative impact discussion for analysis of these cumulative gap-funding projects.) Additionally, the City is not modifying its existing land use plans and is making limited amendments to its zoning ordinance **to in substantial part eliminate discretionary review for most PSH projects** and otherwise, facilitate the ability to construct PSH projects on PF zoned property and potentially larger PSH projects. As discussed, **PSH projects are dependent on gap-funding** and although the City may be modifying some of the allowed density restrictions (i.e. minimum lot area per du or guest room), the number of PSH units is not expected to go beyond the additional 200 units. Additionally, while PSH developments may be slightly larger, historical development of PSH projects demonstrates that applicants prefer smaller projects. The reasonably foreseeable result of these amendments is to potentially obtain larger PSH projects and up to 200 additional units, as explained above.

There are a number of problems with this statement. First, there has been no showing the additional 1,000 units per year (10,000 over 10 years) have been approved. Second, the PSH Ordinance constitutes a change to the zoning code and this is not the same as the unchanged rent control ordinance in the example. Third Measure HHH is a funding mechanism, passed by the voters, not a development project. Voter approved funding is not subject to CEQA review, but that does not mean that the funded projects are not. Fourth, the environmental document fails to identify previously approved gap-funding projects or to show that the 10,000 anticipated units have been previously approved and received CEQA review. Fourth, if the PSH Ordinance eliminates discretionary review for PSH project, then the potential environmental impacts of such projects should be addressed in the environmental document for the discretionary project/approval eliminating future discretionary review. Fifth, the paragraph states that PSH projects are dependent on gap funding, but fails to distinguish projects covered by the PSH Ordinance from other gap-funded PSH projects.

The MND does not cite any environmental documents analyzing the potential impacts of the construction of the other 10,000 units to be constructed over the next 10 years, or clarify why the PSH Ordinance would only apply to 200 units per year. It would therefore appear that the environmental document should address the potential environmental impacts of the combined actions the City is taking to implement its Comprehensive Homeless Strategy, and the construction of the total number of PSH and other homeless housing types that are part of the City’s homeless-elimination efforts. At a minimum the environmental document should analyze construction of the full 1,200 units per year, for a total of 12,000 units. To do otherwise would be to fail to analyze the project as a whole and to engage in project splitting when it comes to the City’s production of PSH units, and any other types of homeless housing units.

The need for the City to address its full Homeless Housing Strategy housing production implementation measures in a single environmental document is further evidenced by a recent Los Angeles Times article entitled: “A plan to house L.A.’s homeless residents could transform parking lots across the city.” This article is included as **Appendix D**. It therefore appears that the MND for the PSH Ordinance is an example of project splitting. This is not cured by the limited statements regarding cumulative impacts contained in the MND (see **Section 2.18**)

2.2 Project Splitting – Failure to Analyze The Whole of the Action – City’s Motel Conversion Ordinance

Although the MND discusses the City’s Residential Hotel Unit Conversion and Demolition Ordinance on MND page II-22, it fails to discuss the City’s proposed Interim Motel Conversion Ordinance as part of the larger housing production strategy for the homeless. According to the public hearing notice for the Interim Motel Conversion Ordinance, the City has assigned the following case numbers to that Ordinance: CPC-2017-3409-CA and ENV-2017-3410-ND. This would indicate that the City is preparing a separate Negative Declaration for this Ordinance. Rather than address the Motel Conversion Ordinance as part of the project, the MND treats it as a cumulative project. This is an additional example of project splitting.

101-2

2.3 Flawed Project Assumptions – Potential Underestimation of Impacts

The MND’s following assumptions regarding the size of PSH projects contained on pages II-22 to II23 of the MND, have not been supported by substantial evidence.⁶

101-3

Assumptions Regarding Size of PSH projects

Over the next 10 years it is assumed that, with the proposed PSH ordinance, 2,000 (200 per year) new PSH units would be developed as a result of the Project. Units developed as a result of the PSH Ordinance would occur in a combination of new (i.e., ground up) and rehabilitation.

⁶ MND footnote (fn) 14 states:
14 Unit size of 200 square feet based on California Tax Credit Allocation Committee Regulations Implementing The Federal And State Low Income Housing Tax Credit Laws; California Code Of Regulations; Title 4, Division 17, Chapter 1; May 17, 2017 <http://www.treasurer.ca.gov/ctcac/programreg/2017/20170517/clean.pdf> page 66
minimum of 200 square feet for special needs projects

The following assumptions are based on existing patterns of development of PSH units:

- Current PSH projects average 60 units per project; however, it is anticipated that the PSH Ordinance will result in slightly larger projects than the City has historically seen, approximately 75 units per project.
- On an annual basis, approximately 71 percent of all PSH projects would be new construction and 29 percent of all projects would be rehabilitation of existing structures.
- The PSH Ordinance requires a minimum of 50 percent of the total units as PSH. However, based on existing projects and Measure HHH funding allowance, it is assumed that 85% of the units would be PSH units (with a unit size of approximately 200 square feet)(fn14) and 15% of units would be affordable for families at risk of becoming homeless (with a unit size of approximately 1,000 square feet).

The MND's assumption that PSH developments would be approximately 75 units per project is not supported by substantial evidence, and if this were the typical project size, there would be no need for the Ordinance to include a CEQA Exemption for individual projects with up to 120 units (200 in downtown), as the existing CEQA exemption for low income project of up to 100 units would be adequate. These flawed project assumptions have the potential to result in the underestimation of project impacts.

2.4 Inadequate Project Description – Failure to Adequately Disclose and Analyze New CEQA Exemption Created By the Project

According to page II-10 MND, of the PSH Units completed between 2008 and 2016, 68% of the units required discretionary approvals. This would change under the PSH Ordinance. Although the MND does provide some information on the fact that the PSH Ordinance would to make many PSH project approvals ministerial, and that it provides an exemption from Site Plan Review requirements, it may not be clear to the reader that the PSH Ordinance creates a new CEQA exemption. According to page II-13-II-14 of the MND:

101-4

Application and Approval. Procedures for Qualified Permanent Supportive Housing Projects are established as:

The process whereby the applicant shall submit an application on a form developed by the Department of City Planning (DCP) that contains basic information about the project, the owner and/or applicant and conformance with this section. The Director of Planning shall review all applications for compliance with the definitions, requirements, zoning compliance, and adherence to the performance standards. The application shall be approved by the Director of Planning through a ministerial Public Benefit process if the eligibility criteria and performance standards are met.

Projects utilizing other affordable housing incentive programs would not be eligible for this application and approval process. For projects requesting additional waivers of development standards that would otherwise physically preclude the construction of the Qualified Permanent Supportive Housing Project,

the discretionary application procedures in Section 12.22 A.25(g)(3) of the LAMC would apply.

Requirements. A Qualified Permanent Supportive Housing project must comply with the following requirements:

- (1) *Supportive Services.* Projects shall provide documentation that describes the level and types of services that will be provided onsite and/or offsite. Prior to project approval, the application shall provide a signed funding commitment letter from a local public agency, verifying that the Supportive Services will be provided.
- (2) *Affordable Housing Covenant.* Projects shall record a covenant acceptable to the Housing and Community Investment Department (HCIDLA) that reserves and maintains the number of dwelling units designated as restricted affordable for at least 55 years from the issuance of the Certificate of Occupancy by the Department of Building and Safety.
- (3) *Housing Replacement.* Projects shall meet any applicable dwelling unit replacement requirements of California Government Code Section 65915(c)(3), as verified by the Housing and Community Investment Department (HCIDLA) prior to the issuance of any building permit.
- (4) *Public Notification.* Applicants shall be required to provide the following public notice of the application:
 - (i) Provide written notice of the application to the abutting property owners and the Council District Office with jurisdiction over the site; and
 - (ii) Post a public notice of the project application on the project site.

According to page II-17 of the MND

Amendment to Section 16.05 D Site Plan Review

An amendment is proposed to Section 16.05 D of the LAMC to provide an exemption from otherwise applicable Site Plan Review procedures for Qualified Permanent Supportive Housing Projects with fewer than 120 units (fewer than 200 units if located in the Greater Downtown Housing Incentive Area) and developed pursuant to the requirements and procedures in Section 14.00 A.11 of the LAMC.

The project description in the MND thus fails to adequately make clear that the Ordinance creates a new CEQA exemption for PSH projects in two sections of the Ordinance, and that this new exemption is inconsistent with Public Resources Code (CEQA) Section 21159.21 and does not require compliance with Public Resources Code (PRC) Section 21159.23. PRC Section 21159.21 provides the criteria for qualifying for housing project exemptions⁷ and PRC Section 21159.23 provides for an exemption for low-income housing for residential housing consisting of 100 or fewer units.⁸ Pursuant to CEQA a low-income housing project

⁷ See also CEQA Guidelines Section 15192.

⁸ See also CEQA Guidelines Section 15194.

would not qualify for an exemption “if there is a reasonable possibility that the project would have a significant effect on the environment or the residents of the project due to unusual circumstances or due to the related or cumulative impacts of reasonably foreseeable projects in the vicinity of the project.”⁹ Pursuant to PRC Section 21159.21, a low income housing project would not qualify for an exemption if it is inconsistent with any applicable general plan, specific plan or local coastal program; community-level environmental review has not been adopted or certified; existing utilities are not adequate to serve the project; the site is on a list of hazardous materials sites; the project would impact historical resources; or is in a hazards area.

In contrast, the Ordinance provides for an exemption for PSH projects, by adding the following language to Article 6.1 – Review of Development Projects, Section 16.05D – Exemptions,¹⁰ via Section 4 of the Ordinance:

Section 4. Subdivision 8 of Subsection D of Section 16.05 of the Los Angeles Municipal Code is added to read as follows:

- 8. A Qualified Permanent Supportive Housing Project developed pursuant to Section 14.00 A.11 of this Code and containing no more than 120 units, or no more than 200 units if it is located in the Greater Downtown Housing Incentive Area.¹¹

The Ordinance thus allows for exemption of PSH projects with a larger number of units than would be allowed under existing CEQA exemptions. This change to existing CEQA exemptions, to create a less restrictive exemption for PSH projects is a discretionary action subject to CEQA review, and should be fully described in the MND and analyzed in the environmental document for the PSH Ordinance. Since the number of projects that would be subject to CEQA review would be reduced by the Ordinance, it is important that the environmental document for the Ordinance provide environmental review of such projects, ideally in the form of a Program EIR.

2.5 Inadequate Project Description – Failure to Identify All Potential PSH City PF Owned Land

In terms of City-owned property and sites in the Public Facilities Zone (PF), the environmental documents identify only the seven Round One Properties, and indicates that: “The CAO intends to continue to identify suitable City owned properties on an annual basis, which will the be included in Request for Proposals to the City’s qualified list of developers.”¹² The MND cannot be used as the environmental clearance for PSH projects unless they are more specifically identified in the MND; Figure 4 is insufficient.

101-5

2.6 Inadequate Project Description – Failure to Identify Development Potential of Round One Properties

⁹ CEQA (Public Resources Code) 21159.23(c).
¹⁰ Section 16.05D states: “Unless made discretionary by any other provision of law, the approval of any building permit for a development project which does not exceed the thresholds set forth in this subsection and Section 12.24U14 is ministerial and exempt from the requirements of the California Environmental Quality Act.
¹¹ Page 9, Draft Ordinance 8/30/2017.
¹² Addendum, page 39.

The MND needs to explain which Round One Properties (MND Table 5, MND pages 38-39) will be subject to separate environmental review, which are addressed in the MND, and which are considered exempt from environmental review with and without the PSH Ordinance. The MND needs to identify the development potential of the Round One Properties. The environmental document for the project needs to provide site-specific analysis for known project sites. It does not do so, and is therefore inadequate.

101-6

2.7 Project Impacts - 1. Aesthetics

The discussion for Checklist Item 1(d) states that: “The Proposed Ordinance would not directly introduce new sources of glare as building materials would be non-reflective materials such as wood, brick, and similar materials. Therefore glare impacts would be less than significant. However, there is nothing in the ordinance that precludes the use of reflective materials and limits exterior materials to wood, brick or similar materials. The conclusion is therefore not supported by substantial evidence.

101-7

2.8 Project Impacts – 2. Air Quality

The MND at page IV-6 states that:

It should be noted that each individual PSH development project would in all likelihood fall below the City's air-quality-related screening criteria for projects eligible for a Categorical Exemption (80 units and less than 20,000 cubic yards of soil export) and therefore would not foreseeably result in significant adverse impact on air quality. The City's air quality screening criteria for preparation of Categorical Exemptions is based on numerous models of various projects; significant air emissions have not been identified for projects of this size (80 units) and less. As discussed above, based on historical PSH projects, PSH development of more than 75 units is unlikely. Projects with more than 120 units (200 units in Greater Downtown) are subject to site plan review and additional environmental review.

However, the PSH ordinance would create a new City CEQA exemption for projects of up to 120 units (200 units in Greater Downtown). The MND’s assumption that PSH developments would be less than 80 units is not supported by substantial evidence and, if this were the typical project size, there would be no need for the Ordinance to provide an CEQA exemption for 120 units (200 in downtown) as the existing CEQA exemption would be adequate.

101-8a

(a) Conflict with or obstruct implementation of the applicable air quality plan?

The analysis states that: “The Proposed Ordinance would not add any new population to the region.” This statement and assumption is not supported by substantial evidence. As discussed in **Section 2.20** of this letter, research indicates that the provision of PSH housing may induce immigration of additional homeless persons into the area. The PSH Ordinance and PSH construction in the City may result in population increases that have not been addressed in the projections underlying the Air Quality Management Plan (AQMP). Evidence exists to support an argument that the PSH Ordinance is not consistent with the AQMP. In addition, the analysis should address the full number of PSH units anticipated to be developed per year over the next

101-8b

ten years.

b) Violation of any air quality standard or contribute substantially to an existing or projected air quality violation?

The analysis is fatally flawed because it does not analyze the project as a whole (the full number of PSH and other homeless housing units be constructed per year and over the life of the project – see **Section 2.1**). The model runs have not been included as an appendix to the MND; the reader is therefore precluded from checking the assumptions in the model runs.

101-8c

2.9 Project Impacts – 4. Biological Resources

The discussion under 4(a) states the following regarding impacts under the Migratory Bird Treaty Act (MBTA):

Construction activities that occur pursuant to the Proposed Ordinance would be required to comply with the provisions of the MBTA as detailed in the Regulatory Compliance Measure RCM BIO-1. Adherence to RCM BIO-1 would ensure that if construction occurs during the breeding season, appropriate measures would be taken to avoid impacts to nesting birds if present. Thus impacts would be less than significant, and no mitigation is required.

Since the PSH Ordinance will render a number of projects exempt from CEQA review, how will Regulatory Compliance Measure RCM BIO-1 and BIO-2 be enforced? For any “Regulatory Compliance Measure” cited in the MND, the specific reference for the regulatory requirements (code, ordinance, etc) should be cited so the reader can be sure the specified measure is in fact a regulatory requirement and not a mitigation measure. As written the PSH Ordinance does not require compliance with this measure. The potential for impacts remains.

101-9a

The discussion under 4(d) states that there is an absence of habitat in High Quality Transit Areas (HQTAs) within the City of Los Angeles and that no significant wildlife movement occurs through potential PSH sites. However, Figure 4 of the MND appears to show eligible parcels along the I-405 through the Santa Monica Mountains. There are wildlife corridors and important habitat linkages along this segment of the I-405.¹³ This segment of I-405 is considered a HQTA.¹⁴ The statement is not supported by substantial evidence and the potential for impacts remains.

101-9b

2.10 Project Impacts – 5. Cultural Resources

Since the PSH Ordinance will render a number of projects exempt from CEQA review, how will Mitigation Measures MM-CUL-1, MM-CUL-2, MM-CUL-3 be enforced? As written the PSH Ordinance does not require compliance with this measure. The potential for impacts remains.

101-10

¹³ See: Eastern Santa Monica Mountains Habitat Linkage Planning Map, Santa Monica Mountains Conservancy, Adopted January 23, 2017, Item 13: <http://smmc.ca.gov/attachment.asp?agendaId=549>; and, Sepulveda Pass Widening Project, Final Environmental Impact Report/Environmental Impact Statement and Section 4(f) Evaluation. http://www.dot.ca.gov/d7/env-docs/docs/Final%20LA405DOC_022208.pdf

¹⁴ See: http://sustain.scag.ca.gov/Documents/HQTA/Maps/LA_MidCityWestsidescagHQTAeligible.pdf and http://sustain.scag.ca.gov/Documents/HQTA/Maps/LA_SanFernandoValley_scagHQTAeligible.pdf

2.11 Project Impacts – 6. Geology and Soils

Since the PSH Ordinance will render a number of projects exempt from CEQA review, how will Regulatory Compliance Measure RCM-GEO-1, RCM-GEO-2, RCM-GEO-3, RCM-GEO-4, RCM-GEO-15/HYD-1, be enforced? For any “Regulatory Compliance Measure” cited in the MND, the specific reference for the regulatory requirements (code, ordinance, etc) should be cited so the reader can be sure the specified measure is in fact a regulatory requirement and not a mitigation measure. For example, it is unclear that the following measure is, in fact, a regulatory requirement:

101-11

ReM GEO-3: Applicants to provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor.

2.12 Project Impacts – 8. Hazards and Hazardous Materials

Since the PSH Ordinance will render a number of projects exempt from CEQA review, how will Mitigation Measures MM-HAZ-1 be enforced? As written the PSH Ordinance does not require compliance with this measure. For Item 8(e) the MND contains the following conclusionary statement, which is not supported by substantial evidence:

101-12a

101-12b

Three airports are located within the City of Los Angeles: two public and one general aviation, respectively they are: Los Angeles International (LAX) and Van Nuys, and Whiteman Airport. Development in accordance with the PSH Ordinance is anticipated to be located in HQTAs away from airport clear zones and accident potential zones. No impact would occur.

The MND should include figures overlaying the PSH eligible parcels shown in Figure 4, and the relevant airport clear and accident potential zones. Given the level of detail provided in Figure 4, it is not possible for a reader of the MND to perform this analysis.

For Item 8(h) the MND relies on the statement that PSH projects would be located in HQTAs and therefore not in hilly or mountainous areas. However, as shown on the Southern California Association of Government’s maps of the HQTA’s¹⁵, large parts of the City, including some hilly areas, are located within HQTA. The statement is not supported by substantial evidence and the potential for impacts remains.

101-12c

For Item 8(g) the MND relies on the statement that PSH projects would be located in HQTAs and therefore not within a 100-year flood hazard area. However, as shown on the Southern California Association of Government’s maps of the HQTA’s¹⁶, large parts of the City, are located within HQTA. The statement is not supported by substantial evidence, as there has been no showing in the MND that HQTA areas are all outside of the 100-year flood zone; the potential for impacts remains. Similarly the statement in 8(i) that development in accordance with the PSH Ordinance would result in no impacts related to the failure of a levee or dam or by

101-12d

¹⁵ <http://sustain.scag.ca.gov/Pages/HQTA.aspx>
¹⁶ <http://sustain.scag.ca.gov/Pages/HQTA.aspx>

inundation by seiche, tsunami, or mudflow is not supported by substantial evidence. The potential for impacts remains.

2.13 Project Impacts – 12. Noise

Since the PSH Ordinance will render a number of projects exempt from CEQA review, how will compliance with the Regulatory Compliance Measures be enforced? How will Mitigation Measures MM-NOI-1 be enforced? As written the PSH Ordinance does not require compliance with this measure. RCM-NOI-2 states that (emphasis added): “LAMC Sections 111.0 through 116.01 require that construction noise greater than 75 dBA at 50 feet is prohibited between the hours of 7 am and 10 pm within 500 feet of a residential zone **unless compliance is technically infeasible.**” Any measure that includes the out of technical infeasibility is moot, and therefore cannot be relied on to reduce potential impacts to less than significant.

101-13a
101-13b

2.14 Project Impacts – 13. Population and Housing

The analysis states that the “PSH Ordinance would not induce substantial population growth, as it would serve an existing population located within the City of Los Angeles.” This statement and assumption is not supported by substantial evidence. As discussed in **Section 2.20** of this letter, research indicates that the provision of PSH housing may induce immigration of additional homeless persons. The PSH Ordinance and PSH construction in the City may result in population increases and these increases will involve additional in migration of homeless persons, a group largely dependent on publically funded housing. This must be addressed in the environmental document for the project.

101-14

The statement in MND Section 13, that: “Some homeless population could seek to move in to the area in search of PSH housing, but this population is not very mobile and it is not anticipated to be a large impact” is not supported by substantial evidence. According to the Los Angeles Homeless Services Authority (Homeless Authority), 12% of the homeless in the County (4,241 persons) have been here for less than one year.¹⁷ The following figure from page 40 of the Greater Los Angeles Homeless Count – Presentation – Los Angeles County and Continuum of Care, Los Angeles Homeless Services Authority, shows the length of time members of the homeless population have spent in the area. In addition, the figure from page 41 of that same presentation, also reproduced below, shows that only approximately 70 percent of the areas homeless population lived in Los Angeles County before becoming homeless. It should also be noted that, according to the Los Angeles Services Authority, homelessness in Los Angeles County has increased 23% since 2016. The potential for population and housing impacts remains.

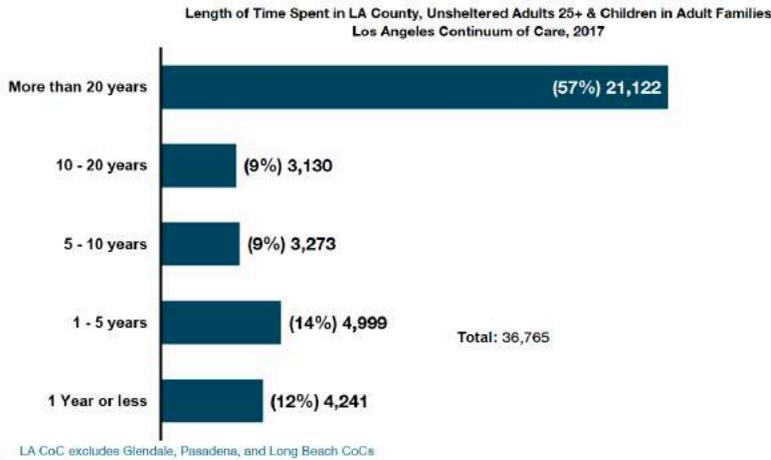
¹⁷ Page 40, Greater Los Angeles Homeless Count – Presentation – Los Angeles County and Continuum of Care, Los Angeles Homeless Services Authority, available at: <https://www.lahsa.org/documents?id=1385-2017-homeless-count-results-los-angeles-county-presentation.pdf>

Length of Time in LA County

Length of Time Spent in LA County by year similar in 2016

Geography:
LA CoC

Population:
Unsheltered Adults 25+
and Children in Adult
Families

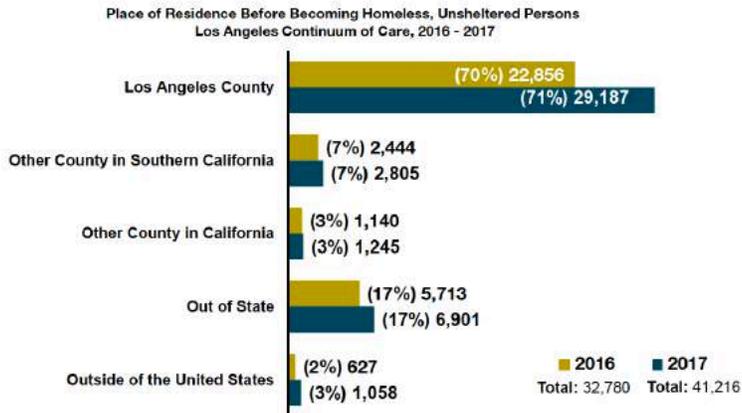


2017 HOMELESS COUNT RESULTS 40

Place of Residence Before Becoming Homeless

Geography:
LA CoC

Population:
Unsheltered



2017 HOMELESS COUNT RESULTS 41

2.15 Project Impacts – 14. Public Services (Police Protection)

As discussed in Section 2.14 of this comment letter, the assumption that the proposed project will not induce population growth is not supported by the evidence.

In addressing whether it is appropriate to increase the size of the low-income housing (i.e. PSH) projects eligible for an exemption, the environmental document for the Ordinance should address the fact that the Minnesota Housing Finance Agency's Research and Evaluation Unit in their review of housing studies found:¹⁸

101-15

Impact on Neighborhood Crime

Research on the relationship between affordable housing and crime identifies project scale as the most important factor in determining the impact on neighborhood crime rates. Multiple studies find that smaller projects (typically less than 50 units) have no impact on neighborhood crime, but that larger projects may result in increased crime. This finding was common across multiple types of affordable housing, including non-profit rental housing, public housing, and supportive housing.

The PSH Ordinance thus has the potential to result in an increase in crime, and thus police services.

2.16 Project Impacts – 17. Tribal Cultural Resources

Since the PSH Ordinance will render a number of projects exempt from CEQA review, how will Mitigation Measures MM-TCR-1 be enforced? As written the PSH Ordinance does not require compliance with this measure. The potential for impacts remains.

101-16

2.17 Project Impacts – 18. Public Services

CEQA Guidelines Section 15155 requires the City to consult with the applicable water agency for any water-demand project, including residential development of more than 500 units, as part of the preparation of the environmental document for the project (in this case the Ordinance). Given that the intent of the Ordinance is to increase the production of PSH, with a goal of at least an additional 2000 units over 10 years, and PSH gap funding would provide for an additional 10,000 units, as part of the preparation of the environmental document for the Ordinance, the City should have consulted with the applicable water agency to determine if the intended effects of the Ordinance were included in the most recently adopted urban water management plan and to prepare a water assessment approved at a regular or special meeting of that governing body. The MND does not demonstrate that the required consultation has taken place.

101-17

2.18 Mandatory Findings of Significance - 19(b). Cumulative Impacts

The MND has not addressed the potential impacts of the additional 10,000 PSH units anticipated to be constructed as a result of Measure HHH in either its analysis of the proposed project, or in its cumulative impacts analysis. The MND is thus fatally flawed. According to page II-17 of the MND (emphasis added):

101-18

The PSH Ordinance could reasonably foresee ably, with the most generous (and

¹⁸ Discussion Paper, Impact of Affordable Housing on Communities and Households, Minnesota Housing Finance Agency, page 4.

conservative) assumptions, result in approximately 200 units in addition to the 1,000 a year units anticipated to result from the previously approved gap-funding projects. Therefore, for purposes of the City's analysis of the PSH Ordinance, the City is analyzing impacts of 2,000 units constructed over a 10-year period (200 units/year). Construction of the other 10,000 units or 1,000 units per year for the next 10 years is assumed to be part of **cumulative development** in the impact analysis.

However, the stated analysis of the other 10,000 units is not contained in either the project impacts analysis or in the MND's discussion of item 19. Mandatory Findings of Significance, part (b) Cumulative Impacts.

As previously noted, the City should prepare an environmental document that addresses the impact of all of its homeless housing production efforts. To do otherwise is to engage in project splitting.

The MND cannot rely on the 2016 RTP/SCS PEIR as its cumulative analysis. MND page IV-75 states that the: "2016 RTP/SCS PEIR identifies the anticipated impacts of cumulative development through 2040 throughout the region," and indicates that overall cumulative development in the City could result in significant impacts. However, the MND fails to identify the significant cumulative impacts identified in the 2016 RTP/SCS PEIR for either the region or the City. As explained in the Executive Summary to the Draft RTP/SCS PEIR, the RTP/SCS would create significant and unavoidable impacts related to the following topics:

- **Aesthetics** (Scenic Vistas, Scenic Highways, Visual Character, Light and Glare/Shadow and Shadow)
- **Air Quality** (Criteria Pollutants Emissions and Construction Emissions)
- **Biological Resources and Open Space** (Special Status Species and Habitat, Natural Lands, Loss of Open Space)
- **Cultural Resources** (Historical Resources, Archeological Resources, Paleontological Resources and Human Remains)
- **Geology, Soils, and Mineral Resources** (Seismicity, Soil Erosion, Expansive Soils, and Aggregate and Mineral Resources)
- **Greenhouse Gas Emissions** (Total GHG Emissions and AB 32 Analysis)
- **Hazardous Materials** (Routine Transport, Upset and Accident Conditions, Contaminated Property, and Schools)
- **Land Use and Agricultural Resources** (Consistency with Plans and Policies, Division of Communities, and Agricultural and Farmlands)
- **Noise** (Construction Noise and Vibration, Land Use Compatibility, and Vibration)
- **Population, Housing and Employment** (Population and Displacement)
- **Public Services and Utilities** (Police, Fire Protection & Emergency Services, Wildfire Hazards, Educational Facilities, Recreational Facilities, Non-Renewable Energy Consumption)
- **Transportation, Traffic and Security** (Vehicle Miles Traveled, Truck Delay)
- **Water Resources** (Water Supply, Wastewater, Riparian Habitats, Groundwater, Water Quality, and Runoff/Drainage)

The MND dismisses the potential for the PSH units analyzed in the MND to contribute to these cumulative impacts, stating that:

PSH development in general would not result in a cumulatively significant contribution to these impacts because:

- PSH development must comply with numerous applicable regulations in the City of Los Angeles (see identified Regulatory Compliance measures throughout this document)
- PSH development would be located in urban areas well-served by infrastructure
- PSH units are generally required to be energy efficient by funding sources
- PSH units have generally very low trip generation

These statements are not sufficient to show that the PSH projects will not result in a contribution to impacts, which is cumulatively considerable. The potential for cumulative impacts remains.

Furthermore, the 2012-2035 Regional Transportation Plan and Sustainable Communities Strategy (2012-2035 RTP/SCS, Plan or Project) analyzed in the PEIR is a “long-range regional transportation plan that provides a blueprint to help achieve a coordinated regional transportation system by creating a vision for transportation investment throughout the region and identifying regional transportation and land use strategies to address mobility needs. The 2012-2035 RTP/SCS includes goals, policies and performance indicators, identifies specific projects, programs and implementation, and includes a description of regional growth trends that identify future needs for travel and goods movement.” It is not a document that analyzes the impacts of PSH development and no housing projects are included on the PEIR Project List (PEIR Appendix B). The City therefore cannot rely on the 2016 PEIR as the cumulative impacts analysis for the PSH Ordinance and gap-funded projects.

2.19 Indirect Impacts - Property Values

The MND should address the fact that there is evidence, that PSH facilities may lead to a decrease in property values when located in higher income areas. According to “The Impacts of Supportive Housing on Neighborhoods and Neighbors”:

101-19

While the *average* relationship between this set of supportive housing facilities and proximate house prices was positive, not all site/neighborhood combinations in Denver experienced the same relationship. When we disaggregated our analysis to measure impacts for different common clusters of sites/neighborhoods, we found that the set of five supportive housing sites located in low-valued, heavily minority-occupied (typically majority Black-occupied) neighborhoods consistently evinced the positive price impacts noted above. By contrast, the site in the highest-value, overwhelmingly white-occupied neighborhood apparently had a *negative* effect on house prices, as did another (poorly maintained) site in a modestly valued, high-density core neighborhood having 24 percent of its population classified as Hispanic.¹⁹

¹⁹ “The Impacts of Supportive Housing on Neighborhoods and Neighbors”, The Urban Institute (October 1999), George Galster et al, page xii:

Our central finding—that supportive housing generally has a positive impact on neighborhoods when done at a small scale, but that poorly managed properties can be deleterious to neighborhoods—implies that public policy would do well to encourage both public education and high-quality operation in the realm of supportive housing. Our findings also strongly suggest that the public sector pay strict attention to the ongoing operation, tenant management, and physical maintenance of supportive housing facilities.²⁰

The environmental document should address the potential environmental consequences of changes in property values and the potential for associated environmental deterioration.

2.20 Growth Inducing Impacts

According to page II-6 of the MND:²¹

According to the Los Angeles Homeless Services Authority (LAHSA) January 2017 Greater Los Angeles Homeless Count there are approximately 34,189 homeless in the City of Los Angeles, of which 25,237 (74%) are unsheltered and 8,952 (26%) are sheltered. (fn6)

Recent research has indicated the potential for the construction of PSH to induce in-migration of additional homeless into a Continuum of Care (CoC) area²² or inhibit out-migration of homeless. As explained by Corinth:

101-20

One potentially important factor that could affect estimates of associations between PSH and homelessness is migration. A CoC that expands its inventory may experience an inflow of homeless people seeking services or a reduced outflow of homeless people to other CoCs.²³

Between 2007 and 2014, communities across the United States rapidly expanded the inventory of PSH beds for homeless individuals with disabling conditions. . . I find that each additional PSH bed was associated with between 0.04 and 0.12 fewer homeless people after one year. Causal effects identified on the basis of lagged funding decisions imply that one additional PSH bed reduces homeless counts by up to 0.10 people. Effect sizes of greater than 0.72 can be rejected at the

²⁰ Ibid, page xiv:

²¹ Footnote 6 in the MND states:

6 Los Angeles Homeless Services Authority, Data and Reports, City of Los Angeles, 2016, [https://documents.lahsa.org/planning/homelesscount/2016/datasummaries/La City. pdf](https://documents.lahsa.org/planning/homelesscount/2016/datasummaries/La%20City.pdf)

²² A Continuum of Care (CoC) is a regional or local planning body that coordinates housing and services funding for homeless families and individuals. There are 414 CoCs in the United States. The Los Angeles CoC covers the Los Angeles County area, but excludes the cities of Glendale, Pasadena and Long Beach.

²³ Corinth, Kevin. “The Impact of Permanent Supportive Housing on Homeless Populations.” *Journal of Housing Economics* 35 (2017) 69-84. Page 75. Available at: https://ac.els-cdn.com/S1051137715300474/1-s2.0-S1051137715300474-main.pdf?_tid=0ccdc104-ba9c-11e7-a99d-00000aacb35f&acdnat=1509056685_fceb158ca8e69a34586fd1d9d46ba052

95% confidence level, ruling out the simple reasoning that adding one unit of housing reduces homelessness by one person. Relatively modest effects may be explained by some combination of poor targeting, differential exit rates into private housing from PSH relative to homelessness, incentives for remaining homeless, errors in homeless counts, and migration in response to expanded PSH. Indeed, PSH expansion in the rest of a state is associated with significant reductions in homeless counts within a community, consistent with homeless migration in response to PSH expansion.²⁴

The environmental analysis for the proposed Ordinance should therefore address the growth-inducing impacts of the proposed Ordinance.

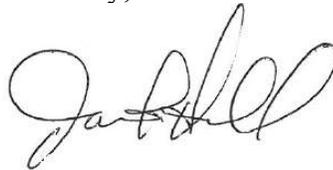
3. CONCLUSION

The City has not proceeded in the manner prescribe by law regarding the environmental documentation for the PSH Ordinance. The City must therefore take the following actions:

- Void the actions taken by the Planning Commission regarding the PSH Ordinance and the associated environmental documents;
- Prepare an EIR to address the potential impacts of the full range of the City’s efforts to provide housing for homeless persons in the City.
- The EIR should include an analysis of the growth-inducing impacts of the production of housing for homeless persons.
- Comply with CEQA-mandated process requirements.

Thank you in advance for your thoughtful consideration of these issues of concern. I maybe contacted at 310-982-1760 or at jamie.hall@channellawgroup.com if you have any questions, comments or concerns.

Sincerely,



Jamie T. Hall

APPENDICES:

- A Past Channel Law Letters on the PSH Ordinance and MND
- B Minutes From Planning Commission Meeting from December 14, 2017 through February 8, 2018.
- C Notice of Intent to Adopt the MND (dated 1/8/2018)
- D Los Angeles Times Article: A Plan to House L.A.’s Homeless Residents Could Transform Parking Lots Across The City

²⁴ Corinth, Kevin. “The Impact of Permanent Supportive Housing on Homeless Populations.” *Journal of Housing Economics* 35 (2017) 69-84. Page 80.

Appendices – Channel Law Letter

February 12, 2018

Comments On The Environmental Documentation For, And The, Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd (APN 4238-024-900 To 911)

APPENDIX A

The Two Past Channel Law Letters on the PSH Ordinance and MND

Channel Law Group, LLP

8200 Wilshire Blvd.
Suite 300
Beverly Hills, CA 90211

Phone: (310) 347-0050
Fax: (323) 723-3960
www.channellawgroup.com

JULIAN K. QUATTLEBAUM, III *
JAMIE T. HALL **
CHARLES J. McLURKIN

Writer's Direct Line: (310) 982-1760
jamie.hall@channellawgroup.com

*ALSO Admitted in Colorado
**ALSO Admitted in Texas

December 20, 2017

VIA ELECTRONIC MAIL

Los Angeles Planning Commission
Department of City Planning,
City Hall - Room 763,
200 North Spring Street,
Los Angeles CA 90012

Via email: darlene.navarrete@lacity.org
and: cally.hardy@lacity.org

**Re: Comments On The Environmental Documentation For, And The,
Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-
3137) And Proposed Redevelopment Of Venice Dell Pacific Site Located At
125 E. Venice Blvd (APN 4238-024-900 To 911)**

Dear Planning Commissioners:

This firm represents Venice Vision with regard to the proposed development at 125 E. Venice Boulevard as well as the Permanent Supportive Housing Ordinance proposed by the City of Los Angeles (City). The City released the Permanent Supportive Housing (PSH) Ordinance for a 60-day comment period beginning on August 31, 2017 and ending on October 30, 2017. On October 30, 2017 Channel Law provided the City with comments on the Permanent Supportive Housing (PSH) Ordinance, including comments on:

- The lack of availability of a California Environmental Quality Act (CEQA) document during the public review period for the PSH Ordinance;
- The inaccurate project description provided as part of the answers to the Frequently Asked Questions attached to the Notice requesting comments on the PSH Ordinance;
- The failure of the PSH Ordinance Notice to disclose the creation of a new CEQA exemption;
- The inadequate project description resulting from failure to describe the number and location of PSH developments;
- The inadequate requirement for the provision of supportive services, and its potential to result in environmental consequences; and,

- The need to address the potential for growth-inducing impacts, cumulative impacts, and increased water demand.

Channel Law’s comment letter is incorporated herein by reference and included as **Attachment 1** to this letter. Channel Law asked a number of questions regarding the PSH Ordinance and also made the following suggestions regarding ways to amend the PSH Ordinance in that letter, including:

- Remove the new CEQA exemption for PSH projects; instead the existing CEQA low-income housing exemption should be applied.
- Include language in the Ordinance to make clear that pursuant to CEQA Guidelines Section 15268(d) where a PSH project involves an approval that contains elements of both a ministerial action and a discretionary action, the project will be deemed to be discretionary and will be subject to the requirements of CEQA.
- Allow for automatic rezoning of only those parcels addressed in the environmental document for the proposed Ordinance, or specifically addressed in the environmental document for the applicable area plan.
- Add requirements for provision of an appropriate level of supportive services to be maintained over the life of individual PSH projects.

Channel Law has not received responses to our questions or comments. Channel Law’s comment letter was not included in the December 14, 2017 Staff Report and agenda packet for the Planning Commission. Furthermore, Channel Law’s comments and suggestions have been largely ignored, and have not been adequately addressed in the December 14, 2017 Staff Report, including the following Exhibits to the Staff Report:

- A - Proposed Permanent Supportive Housing Ordinance
- B - Environmental Clearance
 - B.1 Mitigated Negative Declaration
 - B.2 Addendum to the SCAG 2016-2040 RTP/SCS PEIR, SCH No. 2015031035
- C - Affordable Housing Opportunity Sites

On November 30, 2017 the City released the Mitigated Negative Declaration (MND) for the project, for public review and comment. The City has not circulated the “Addendum” to the SCAG 2016-2040 RTP/SCS PEIR or noticed the availability of the Addendum.

This comment letter provides comments on both the City’s flawed process and problems with the environmental documents for the PSH Ordinance. We would request responses to both the comments contained in this letter, and our October 30, 2017 letter.

1. THE CITY’S PROCESS FOR REVIEWING AND APPROVING THE PERMANENT SUPPORTIVE HOUSING ORDINANCE IS FATALLY FLAWED

The City has engaged in a confusing and fatally flawed process regarding the adoption of the Permanent Supportive Housing Ordinance (PSH Ordinance).

1.1 The City Conducted Public Hearings and Ended The Comment Period On The Ordinance Prior to Release of the Environmental Document

The City released the PSH Ordinance for a 60-day comment period beginning on August 31, 2017 and ending on October 30, 2017. During the 60-day comment period, staff held two public hearings on the PSH Ordinance, on: September 25, 2017 and September 28, 2017. The comment period thus ended a month before the City's November 30, 2017 release of the MND for the project.

The failure to provide the public with the MND for the PSH Ordinance until one month after the close of the public comment period on the PSH Ordinance has inappropriately limited public comment on the PSH Ordinance, in violation of Public Resources Code (PRC) Section (§) 21003.1 and CEQA Guidelines §15004 which states:

(b) Choosing the precise time for CEQA compliance involves a balancing of competing factors. EIRs and negative declarations should be prepared as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment.

...

(c) The environmental document preparation and review should be coordinated in a timely fashion with the existing planning, review, and project approval processes being used by each public agency. These procedures, to the maximum extent feasible, are to run concurrently, not consecutively. When the lead agency is a state agency, the environmental document shall be included as part of the regular project report if such a report is used in its existing review and budgetary process.

Channel Law commented in our October 30, 2017 letter on the fact that failure to provide the public with a copy of the CEQA document during the public review period inhibited the ability of the public to comment on, or fully understand, the potential impacts of the proposed PSH Ordinance. In addition, requiring the public to separately comment on the PSH Ordinance and then subsequently on the MND for the project, unduly burdens the public, since as noted in the Channel Law letter, a full description of the components and sites affected by the PSH Ordinance was not made available to the public during the comment period on the Ordinance.

According to the Staff Report for the December 14, 2017 Planning Commission hearing on the PSH Ordinance, the City has made the following changes to the August 30, 2017 version of the PSH Ordinance:

- References were added to State Density Bonus law to make clear that the ordinance is intended to create permanent supportive housing units consistent with state density bonus provisions. This revision ensures that the grant of any bonuses, incentives, or concessions under this ordinance shall not be considered an increase in density or other change which requires any corresponding zone change, general plan amendment, specific plan

exception, or discretionary action. This does not supersede or in any way alter or lessen the effect or application of the Coastal Act.

- To ensure general plan land use consistency, the amendment to the PF Zone was revised to allow the application of the least restrictive adjacent zone, in lieu of the least restrictive zone within 1/4-mile radius of the project site.
- To more closely align with other incentives, a modification was made to allow for up to 20% relief in any other development standard not already specified, in lieu of 35% relief.
- The construction standards were revised to be more consistent with Mitigation Measures included in the Mitigated Negative Declaration prepared for the ordinance.
- The definition of a Qualified PSH Project was amended to reflect recent changes to definitions for project funding requirements under Measure HHH and ensure that these requirements are in alignment.
- The setback incentive was revised to respect prevailing front yards in residential zones.
- To further ensure high quality, pedestrian-scale design, additional design standards were added related to screening of parking structures.

The modified PSH Ordinance was not made available to the public concurrent with the release on the MND for the PSH Ordinance. In addition, it is unclear whether the MND analyzes the August 17, 2017 or current version of the PSH Ordinance. Which version is analyzed in the MND?

1.2 The Planning Commission Took Action on the Project Prior to The Close of the MND Comment Period

The PSH Ordinance was considered by the Planning Commission on December 14, 2017, prior to the close of the 20-day comment period on the MND on December 20, 2017. At the Planning Commission hearing, recommended actions included (See **Attachment 2** – Audio Links Item 12):¹

- | | |
|-------------|--|
| RECOMMENDED | 1. Recommend adoption of the proposed ordinance (Exhibit A); |
| ACTIONS: | 2. Adopt the staff report as the Commission report on the subject; |
| | 3. Adopt the attached Findings; |
| | 4. Recommend that the City Council FIND that pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including Mitigated Negative Declaration No. ENV-2017-3137-MND ("Mitigated Negative Declaration-) (Exhibit B.1), and all comments received, with imposition of mitigation measures, there is no substantial evidence that the project will have a Significant effect on the |

¹Item CPC-2017-3409-CA <https://planning.lacity.org/InternetCalendar/pdf.aspx?Id=59215>

See Attachment 2 – Item 12 with a link to the Audio of hearing:

<https://planning.lacity.org/InternetCalendar/pdf.aspx?Id=59322>

<http://planning.lacity.org/StaffRpt/Audios/CPC/2017/12-14-2017/13%20CPC-2017-3409.mp3>

environment; FIND the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; FIND the mitigation measures have been made conditions on the project; and ADOPT the Mitigated Negative Declaration; and

5. **Recommend** that the City Council FIND, based on their independent judgment, after consideration of the whole of the administrative record, including the SCAG 2016-2040 RTP/SCS PEIR, SCH No. 2015031035, certified on April 7, 2016 (EIR) and the Addendum prepared for the Permanent Supportive Housing Ordinance (Addendum) (Exhibit B.2), the project was assessed in the EIR and pursuant to the CEQA Guidelines, Sections 15162 and 15164 and the Addendum that no major revisions to the EIR are required and no subsequent EIR or negative declaration is required for approval of the project.

The Planning Commission took the actions recommended by Staff. As noted in the Letter of Determination dated December 19, 2017 for the PSH Ordinance included as **Attachment 2**, the Planning Commissions actions included the following finding (emphasis added):

1. Found pursuant to CEQA Guidelines Section 1507 4(b), after consideration of the whole of the administrative record, including Mitigated Negative Declaration No. ENV-2017- 3137-MND (Mitigated Negative Declaration), **and all comments received**, with imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; Found that the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; Found the mitigation measures have been made enforceable conditions on the project; and adopt the Mitigated Negative Declaration; and Adopted the Mitigated Negative Declaration and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;
- ...
4. Approved and recommended that the City Council adopt the proposed ordinance, as amended by the Commission, subject to review by the City Attorney as to form and legality; and
5. Adopted and recommended that the City Council adopt the attached Findings.

The Planning Commission's findings contain an untruth. The Planning commission could not have considered comments on the MND before approving the ordinance, since the Planning Commission acted before completion of the public comment period on the MND. This is a violation of CEQA Guidelines § 15004(b), which states:

- (2) To implement the above principles, public agencies shall not undertake actions concerning the proposed public project that would have a significant adverse effect or limit the choice of alternatives or mitigation measures, before completion of CEQA compliance. For example, agencies shall not:

- (A) Formally make a decision to proceed with the use of a site for facilities which would require CEQA review, regardless of whether the agency has made any final purchase of the site for these facilities, except that agencies may designate a preferred site for CEQA review and may enter into land acquisition agreements when the agency has conditioned the agency's future use of the site on CEQA compliance.
- (B) Otherwise take any action which gives impetus to a planned or foreseeable project in a manner that forecloses alternatives or mitigation measures that would ordinarily be part of CEQA review of that public project.

1.3 The City Circulated The Mitigated Negative Declaration For 21-Days, Rather Than The 30-Days Required For A Project Of Area-Wide Significance

The MND for the PSH Ordinance was release for public review and comment on November 30, 2017 for a 21-day period ending December 20, 2017. As noted on page II-1 of the MND: "The Proposed Ordinance would apply citywide." The MND is for a project of area-wide significance, as defined in CEQA Guidelines §15206(b)(2).² Therefore, pursuant to CEQA the MND should have been circulated for 30-day public review and comment.

As shown in MND Figure 4, included in **Attachment 4**, PSH-eligible parcels are located throughout the City and in close proximity to other jurisdictions. The proposed project has the potential to result in impacts that extend beyond the City in which the project is located.

Recent research has indicated the potential for the construction of PSH to induce in-migration of additional homeless into a Continuum of Care (CoC) area or inhibit out-migration of homeless.³ A Continuum of Care (CoC) is a regional or local planning body that coordinates housing and services funding for homeless families and individuals. There are 414 CoCs in the United States. The Los Angeles CoC covers the Los Angeles County area, but excludes the cities of Glendale, Pasadena and Long Beach. There are 88 incorporated cities in Los Angeles County. The PSH Ordinance thus has the potential to impact 85 of the cities and the County of Los Angeles, which are part of the Los Angeles CoC.

The proposed project is of area-wide significance as defined in CEQA Guidelines §15206(b)(2) since it will result in the construction of more than 500 dwelling units. As noted on page II-4 of the MND: "The City's Comprehensive Homeless Strategy identified a need to build at least 1,000 PSH units per year, an increase of up to 700 units from its current average production rate of approximately 300 units per year. As noted on page II-5 of the MND:

² In addition, several of the round-one parcels are located within the Coastal Zone, as shown on MND Figure 5. **Attachment 3** contains the City of Los Angeles Parcel Profile Report for the parcels located at 125 E Venice Boulevard (The Venice Dell Pacific Site, incorrectly listed as 200 E Venice Boulevard in the MND and Exhibit C to the Staff Report) and Thatcher Yard parcel at 3238 Thatcher Avenue, showing that these two parcels are located in the Coastal Zone. Therefore any EIR required for the project would need to be circulated to the State Clearinghouse pursuant to CEQA 15206(b)(4)(C).

³ Corinth, Kevin. "The Impact of Permanent Supportive Housing on Homeless Populations." Journal of Housing Economics 35 (2017) 69-84. Page 75. Available at: https://ac.els-cdn.com/S1051137715300474/1-s2.0-S1051137715300474-main.pdf?_tid=0cedc104-ba9c-11e7-a99d-00000aacb35f&acdnt=1509056685_fceb158ca8e69a34586fd1d9d46ba052

Based on this study, and due to the fact that the construction of PSH is constrained by the availability of public funding, it is reasonably foreseeable that the Proposed PSH Ordinance could, with the most generous assumptions (and conservative for purposes of environmental review), result in the construction of an additional 200 units per year of PSH in addition to the 1,000 units per year anticipated to result from Measure HHH and other previously approved gap-funding projects. Therefore, for purposes of the City's analysis of the PSH Ordinance in this MND, the City is analyzing the impacts of construction and operation of 2,000 units constructed over a 10-year period (200 units/year). Construction of the other 10,000 or 1,000 units a year for the next 10 years is part of the cumulative development allowed by the previously approved gap funding projects, identified above.

The public and affected and responsible agencies have been provided with inadequate time to review and comment on the MND for the PSH Ordinance. The PSH Ordinance should have been circulated for a 30-day comment period.

1.4 Violation of CEQA Guidelines § 15072(b) - The City Failed To Provide The Notice As Required By CEQA To Channel Law

In Channel Law's October 30, 2017 letter on the PSH Ordinance on page 2, Channel Law requested that the City:

Please contact us and provide information on the timeline for CEQA compliance and the type of CEQA document to be prepared. Indicate how participation in the CEQA process will be coordinated with the Ordinance review and consideration process. Please provide any notices or other information regarding this Ordinance to us at the address listed on our letterhead.

Although Jamie Hall of our office did receive email notice, on December 7, 2017⁴ (at 5:36 PM) from Cally Hardy - Los Angeles City Planning Assistant, regarding the fact that: "The Permanent Supportive Housing Ordinance (CPC-2017-3136-CA) has been scheduled for next Thursday's (12/14) meeting of the City Planning Commission," Channel Law received no notice regarding the availability of the MND or Addendum for the project, despite having commented on the need for CEQA compliance prior to approval of the PSH Ordinance, and having requested provision of notices or other information regarding this matter. CEQA Guideline § 15072 requires in part that:

- (b) The lead agency shall mail a notice of intent to adopt a negative declaration or mitigated negative declaration to the last known name and address of all organizations and individuals who have previously requested such notice in writing . . .

⁴ On November 30, 2017 the City released the Mitigated Negative Declaration (MND) for the project, for public review and comment. Notice of the Planning Commission hearing and how to access the Staff Report for the hearing was not received until December 7, seven days after the start of the comment period on the MND.

The City thus failed to proceed in the manner proscribed by law, and inhibited Channel Law's ability to participate in the CEQA process by failing to provide notice of the availability of the CEQA documents.

1.4. The City's Notice of Intent to Adopt the MND Fails to Comply with the Noticing Requirements of CEQA Guidelines Section 15070(g)

The environmental notice for the MND (Mitigated Negative Declaration-NG-17-140-PL: ENV-2017-3137) is included as **Attachment 5**. It states:

MITIGATED NEGATIVE DECLARATION-NG-17-140-PL: ENV-2017 3137. Citywide zoning ordinance affecting all parcels in the City of Los Angeles zoned for multifamily residential use & located within High Quality Transit Areas (HQTAs). Additionally, PSH development could occur on some parcels zoned Public Facilities (PF), and on some sites which are currently protected under the City's Residential Hotel Unit Conversion & Demolition Ordinance in LAMC Section 47.70 et seq. CD's 1-15. The Proposed Permanent Supportive Housing (PSH) Project is an ordinance (PSH Ordinance) that would amend the City of Los Angeles Municipal Code (LAMC) to facilitate development of PSH units. The purpose of this ordinance is to improve the process for the development of these units. The Proposed PSH Project would amend Sections 12.03, 12.04.09, 14.00 & 16.05 of the LAMC establishing regulations that define PSH & project eligibility criteria, establish unique development standards for PSH, and facilitate administrative review & approval, as well as modify certain provisions related to height & density, consistent with State Density Bonus Law. The PSH Ordinance would allow for projects to select up to four concessions with respect to Zoning Code, including up to 20% decrease in required setbacks, up to 20% reduction in required open space, up to 20% increase in lot coverage limits, up to 35% increase in FAR and depending on the height district up to a 35% increase in height or one additional story. Additional design requirements include that when adjacent to or across an alley from an R2 or more restrictive zone, the building's transitional height shall be stepped-back within a 45-degree angle. REVIEW/COMMENT period ends: Dec. 20, 2017.

The notice fails to include the following information required by CEQA Guidelines § 15070(g):

- (g) A notice of intent to adopt a negative declaration or mitigated negative declaration shall specify the following:
 - (2) The starting and ending dates for the review period during which the lead agency will receive comments on the proposed negative declaration or mitigated negative declaration. This shall include starting and ending dates for the review period. If the review period has been shortened pursuant to Section 15105, the notice shall include a statement to that effect.
 - (3) The date, time, and place of any scheduled public meetings or hearings to be held by the lead agency on the proposed project, when known to the lead agency at the time of notice.
 - (5) The presence of the site on any of the lists enumerated under Section 65962.5 of the Government Code including, but not limited to lists of

hazardous waste facilities, land designated as hazardous waste property, and hazardous waste disposal sites, and the information in the Hazardous Waste and Substances Statement required under subdivision (f) of that section.

The Notice fails to include several required items. Although the notice is dated November 30, 2017, it fails to specially state the starting and ending dates for public review per CEQA Guidelines § 15070(g)(2). Although a Planning Commission hearing was held on December 14, 2017 and separately noticed on December 7, 2017, the environmental notice published on the City's website and in the Los Angeles Times fails to list the date, time and place of this known public meeting per CEQA Guidelines § 15070(g)(3). Although the MND identifies the potential for PSH sites to be included on a list of hazardous materials sites complied pursuant to Government Code Section 65962.5, and includes a mitigation measure to address this,⁵ the environmental notice published by the City fails to identify this, per CEQA Guidelines § 15070(g)(5).

1.5 The City Inappropriately Relies In-Part On An Addendum Prepared By The City to An EIR Prepared By Another Agency

In an effort to provide cover for the City's failure to both prepare an adequate MND for the project and to comply with MND process requirements specified in CEQA, the Planning Commission was also presented with a second, separate environment document for the PSH Ordinance: a City-prepared Addendum to the Program Environmental Impacts Report (PEIR) for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) prepared by the Southern California Association of Governments (SCAG).⁶ This was included as a separate environmental document for the PSH Ordinance. This was no doubt done in order to further frustrate the ability of the public to review and comment on the environmental document for the project, since an Addendum need not be circulated for public review.

According to the Letter of Determination included in **Attachment 2**, Planning Commission then took the following action at its December 14, 2017 meeting:

At its meeting of December 14, 2017, the Los Angeles City Planning Commission took the actions below in conjunction with the approval of the proposed ordinance: . . .

2. Approve and recommend that the City Council find, based on their independent judgement, after consideration of the whole of the administrative record, including the SCAG 2016-2040 RTP/ SCS PEIR (SCH No. 2015031035), certified on April 7, 2016 (EIR) and the Addendum prepared for the PSH Ordinance (Addendum), the project was assessed in the EIR and pursuant to the CEQA Guidelines, Sections 15162 and 15164 and the

⁵ MND pages III-5 and IV-37 to IV-39.

⁶ A copy of the PEIR is available at: <http://scagrtpscscs.net/Pages/DRAFT2016PEIR.aspx>

Copies of the SCAG's two Addendums are available at:

<http://scagrtpscscs.net/Pages/FINAL2016PEIR.aspx>

<http://scagrtpscscs.net/Pages/2016RTPSCSAmendments.aspx>

Addendum that no major revisions to the EIR are required and no subsequent EIR, or negative declaration is required for approval of the project;

Use Of Both An MND and Addendum For The Same Project Is Inappropriate

Nowhere in CEQA is it contemplated that a Lead Agency would prepare two concurrent and separate environmental documents for a project. Doing so is particularly egregious when the public has been afforded inadequate time to review one of the documents and no time to review the other. In fact, preparation of the Addendum is contrary to a number of CEQA precepts, including:

- PRC § 21003, which states in part: “(f) All persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical, and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment.”
- Guidelines §15002(a), which states: Basic Purposes of CEQA. The basic purposes of CEQA are to: (1) Inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities.
- Guidelines §15002 (j), which states: Public Involvement. Under CEQA, an agency must solicit and respond to comments from the public and other agencies concerned with the project. (See: Sections 15073, 15086, 15087, and 15088.)

Addendum Process Failed To Comply With CEQA

Not only is the use of an Addendum inappropriate in this case for a number of reasons, the City has failed to comply with the procedural requirements for an Addendum. The requirements for use of an Addendum are specified in CEQA Guidelines §15164

15164. ADDENDUM TO AN EIR OR NEGATIVE DECLARATION

- (a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- (c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- (d) The decision making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
- (e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency’s findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

The Addendum prepared by the City does not specify the changes or additions that are necessary SCAG’s RTP/SCS PEIR to address the PSH Ordinance. As required by Guidelines §15164(c) the final PEIR was not provided along with the Addendum to the Planning Commission. As required by Guidelines §15164(d) the Planning Commission did not consider the Addendum with the final prior to making a decision on the project.

The City's preparation of an Addendum is clearly an attempt to circumvent criticism of inadequate provisions for public review of the MND for the PSH Ordinance. This is ironic, given, as shown in **Attachment 6**, the Southern California Association of Governments (SCAG) sent both the PEIR and the SCAG's Addendums to the RTP/SCS PEIR to the State Clearinghouse.⁷ The City has sent neither the MND nor the Addendum to the State Clearinghouse. SCAG not only circulated the Draft EIR for the RTP/SCS for public comment from 12/4/2015 to 2/1/2016, SCAG also circulated its Addendum to the RTP/SCS PEIR for public review and comment from 7/10/2017 to 8/24/2017 (see **Attachment 6**). The City has provided no opportunity for public review and comment on its "Addendum" to the RTP/SCS EIR, nor has it provided the Lead Agency for the PEIR, SCAG, with the opportunity to comment on the Addendum to the RTP/SCS PEIR.

Violation of CEQA Guidelines §15153

Given that the City's Addendum provides no information on the modifications to the RTP/SCD PEIR that are necessary to make the document adequate as the environmental document for the PSH Ordinance, the City is essentially making use of an EIR from an earlier project, the 2016-2040 RTP/SCS. While it is questionable whether a Lead Agency may make use of another agency's EIR for their own project, if the City were to do so, it would need to comply with the requirements of Guidelines §15153, which state in part:

15153. USE OF AN EIR FROM AN EARLIER PROJECT

- (a) The Lead Agency may employ a single EIR to describe more than one project, if such projects are essentially the same in terms of environmental impact. Further, the Lead Agency may use an earlier EIR prepared in connection with an earlier project to apply to a later project, if the circumstances of the projects are essentially the same.
- (b) When a Lead Agency proposes to use an EIR from an earlier project as the EIR for a separate, later project, the Lead Agency shall use the following procedures:
 - (1) The Lead Agency shall review the proposed project with an Initial Study, using incorporation by reference if necessary, to determine whether the EIR would adequately describe:
 - (A) The general environmental setting of the project,
 - (B) The significant environmental impacts of the project, and
 - (C) Alternatives and mitigation measures related to each significant effect.
 - (2) If the Lead Agency believes that the EIR would meet the requirements of subdivision (1), it shall provide public review as provided in Section 15087 stating that it plans to use the previously prepared EIR as the draft EIR for this project. . .
 - (3) The Lead Agency shall prepare responses to comments received during the review period.

Use of an EIR from an earlier project thusly does not absolve the City from the need to provide the public with the opportunity to review and comment on the EIR being used.

⁷ SCH # 2015031035.

The City Should Have Tiered Off the RTP/SCS PEIR Rather Than Prepared an Addendum to the RTP/SCS PEIR

Rather than prepare an Addendum to a Program EIR that was not prepared by the City, CEQA would dictate that the City prepare one environmental document for the PSH Ordinance and tier that environmental document off the RTP/SCS PEIR, if appropriate. This is in fact what SCAG envisioned cities would do, when it prepared the RTP/SCS PEIR. As explained by SCAG on page 1 of Addendum # 2 to the RTP/SCS PEIR:

Pursuant to Section 15152 of the CEQA Guidelines, subsequent environmental analyses for separate, but related, future projects may tier off the analysis contained in the 2016 RTP/SCS PEIR.

This is in fact noted in the City's Addendum, for the PSH Ordinance, which states on pages 1-2, that SCAG envisioned the 2016 RTP/SCS PEIR be used for tiering:

The 2016 RTP/SCS PEIR was drafted as a first tier document that would support local agencies in the SCAG region in considering subsequent projects. As stated in the 2016 RTP/SCS PEIR:

This PEIR provides a first-tier, programmatic environmental analysis, for a long range, regional scale plan document that will support local agencies in the evaluation of subsequent projects, and facilitate avoidance, reduction, and minimization of direct and indirect impacts, growth-inducing impacts, and cumulative environmental impacts with respect to local projects. The project proponent seeking to construct and operate individual properties will need to identify the public agency who will have the primary discretionary land use decision with respect to second tier projects. Consistent with the provisions of Section 15050(a) of the State CEQA Guidelines, the determination of the appropriate second-tier level of environmental review will be determined by the lead agency with primary discretion and decision-making authority for subsequent projects being considered for approval that is subject to CEQA. (RTP/SCS PEIR at 1-2.)

The tiering process is described in PRC §21094 and CEQA Guidelines §15152. As required by PRC §21094(c):

- (c) For purposes of compliance with this section, an initial study shall be prepared to assist the lead agency in making the determinations required by this section. The initial study shall analyze whether the later project may cause significant effects on the environment that were not examined in the prior environmental impact report.

As explained in CEQA Guidelines §15152(f), depending on the outcome of the Initial Study, the Lead Agency may then prepare either a EIR or negative declaration. There is no provision in CEQA or Guidelines §15152 for preparing an addendum when tiering:

- (f) A later EIR shall be required when the initial study or other analysis finds that the later project may cause significant effects on the environment that were not adequately addressed in the prior EIR. A negative declaration shall be required when the provisions of Section 15070 are met.

The City has inappropriately prepared an Addendum for the PSH Ordinance. The Addendum can not and does not excuse the flaws in the MND process for the PSH Ordinance.

2. COMMENTS ON THE STAFF REPORT FOR THE PSH ORDINANCE

2.1 Staff Report and MND Provide Unclear and Conflicting Information Regarding Application of the PSH Ordinance to the Venice Dell Pacific Site and the Thatcher Yard Site

City's Staff Report provide the following unclear and conflicting information regarding the applicability of the PSH Ordinance to the Venice Dell Pacific and Thatcher Yard Sites, stating:

Applicability of PSH Ordinance to Specific Sites

Staff have received numerous comments from members of the public pertaining to specific project sites (see "*Public Communications*"). The proposed ordinance was not drafted with any particular sites in mind, but rather to amend citywide land use regulations governing the development of PSH. In particular, two City-owned properties that are part of the AHOS Initiative led by the Office of the CAO were the subject of many comments received: the Venice Dell Pacific site and the Thatcher Yard site, both in the Venice Community Plan area. The CAO has selected a developer to submit a proposal for each of these sites; however, no proposal has been finalized at this time. It is not clear the extent to which the proposed ordinance may apply to any projects proposed for those sites, or whether the proposed projects would qualify for the provisions of the ordinance.

The Venice Dell Pacific site (125 E. Venice Blvd.) is zoned for Open Space (OS), and therefore would not be eligible for the proposed ordinance as residential uses are not an allowed use in the OS Zone.

The Thatcher Yard site (3233 S. Thatcher Ave.) is zoned for Public Facilities (PF), and is adjacent to an R1 and C4 Zone. The proposed amendments to the PF Zone could facilitate the application of the uses and standards of the adjacent C4 Zone to this site, only if the proposal were for a Qualified PSH project as defined in the ordinance. However, the site is within the Coastal Zone and the Oxford Triangle Specific Plan area and thus would be subject to discretionary review in accordance with these requirements and appropriate environmental clearance.

However, Exhibit C to the Staff Report, the MND and the Addendum identify both of these properties as Round-One Properties. Exhibit C and similar pages in the environmental documents indicate that the City has an Exclusive Negotiating Agreement (ENA) with Hollywood Community Housing Corporation and Venice Community Housing for the Venice

Dell Pacific Site, despite the fact that it is zoned Open Space. Is the City planning to re-zone the site? Exhibit C indicates that the City has an Exclusive Negotiating Agreement (ENA) with Thomas Safran and Associates for the Thatcher Yard Site. What environmental documents were prepared prior to entering into the ENAs for these two sites? As noted in our October 30, 2017 comment letter, Section 16.05 B.2 of the City's Municipal Code specifies that any project requiring a coastal development permit is discretionary, thus triggering CEQA. As shown in **Attachment 3**, both of these sites are located in the Coastal Zone. Pursuant to Public Resources Code § 21003.1 and CEQA Guidelines §15004 environmental review should have been conducted prior to executing the ENAs. What environmental document will be prepared prior to approving any project on these two sites? The MND should identify those site that will be subject to further environmental review, the nature of that review and whether the environmental documents will be circulated to the public for review and comment.

3. COMMENTS ON THE ENVIRONMENTAL DOCUMENTS FOR THE PSH ORDINANCE

As previously noted in this comment letter, Channel Law and members of the public have been provided with insufficient time to review and comment on the environmental documents for the PSH Ordinance. Given the time constrains, we off these preliminary comments on the defects in the environmental documents.

3.1 Inadequate Project Description – Failure to Identify All Potential PSH City Owned Land

The MND needs to explain which Round One Properties (MND Table 5, MND pages 38-39) will be subject to separate environmental review, which are addressed in the MND, and which are considered exempt from environmental review with and without the PSH Ordinance. (See also comments in Section 2.1 above.) The MND needs to identify the development potential of the Round One Properties. The environmental document for the project needs to provide site-specific analysis for known project sites.

In terms of City-owned property and sites in the Public Facilities Zone (PF), the environmental documents identify only the seven Round One Properties, and indicates that: The CAO intends to continue to identify suitable City owned properties on an annual basis, which will the be included in Request for Proposals to the City's qualified list of developers."⁸ The MND can not be used as the environmental clearance for PSH projects unless they are more specifically identified in the MND; Figure 4 is insufficient.

The project description in the MND fails to disclose that the Ordinance creates a new CEQA exemption for PSH projects in two sections of the Ordinance, and that this new exemption is inconsistent with Public Resources Code (CEQA) Section 21159.21 and does not require compliance with Public Resources Code (PRC) Section 21159.23. PRC Section 21159.21 provides the criteria for qualifying for housing project exemptions⁹ and PRC Section 21159.23 provides for an exemption for low-income housing for residential housing consisting of 100 or fewer units.¹⁰ Pursuant to CEQA a low-income housing project would not qualify for an

⁸ Addendum, page 39.

⁹ See also CEQA Guidelines Section 15192.

¹⁰ See also CEQA Guidelines Section 15194.

exemption “if there is a reasonable possibility that the project would have a significant effect on the environment or the residents of the project due to unusual circumstances or due to the related or cumulative impacts of reasonably foreseeable projects in the vicinity of the project.”¹¹ Pursuant to PRC Section 21159.21, a low income housing project would not qualify for an exemption if it is inconsistent with any applicable general plan, specific plan or local coastal program; community-level environmental review has not been adopted or certified; existing utilities are not adequate to serve the project; the site is on a list of hazardous materials sites; the project would impact historical resources; or is in a hazards area.

In contrast, the Ordinance provides for an exemption for PSH projects, by adding the following language to Article 6.1 – Review of Development Projects, Section 16.05D – Exemptions,¹² via Section 4 of the Ordinance:

Section 4. Subdivision 8 of Subsection D of Section 16.05 of the Los Angeles Municipal Code is added to read as follows:

8. A Qualified Permanent Supportive Housing Project developed pursuant to Section 14.00 A.11 of this Code and containing no more than 120 units, or no more than 200 units if it is located in the Greater Downtown Housing Incentive Area.¹³

The Ordinance thus allows for exemption of PSH projects with a larger number of units than would be allowed under existing CEQA exemptions. This change to existing CEQA exemptions, to create a less restrictive exemption for PSH projects is a discretionary action subject to CEQA review, should be disclosed in the MND and analyzed in the environmental document for the PSH Ordinance.

3.2 Project Impacts

We offer the following limited comments on the discussion of potential project impacts, given the inadequate time provided for review and comment on the environmental documents for the PSH Ordinance.

Impact on Crime

In addressing whether it is appropriate to increase the size of the low-income housing (i.e. PSH) projects eligible for an exemption, the environmental document for the Ordinance should address the fact that the Minnesota Housing Finance Agency’s Research and Evaluation Unit in their review of housing studies found:¹⁴

¹¹ CEQA (Public Resources Code) 21159.23(c).

¹² Section 16.05D states: “Unless made discretionary by any other provision of law, the approval of any building permit for a development project which does not exceed the thresholds set forth in this subsection and Section 12.24U14 is ministerial and exempt from the requirements of the California Environmental Quality Act.

¹³ Page 9, Draft Ordinance 8/30/2017.

¹⁴ Discussion Paper, Impact of Affordable Housing on Communities and Households, Minnesota Housing Finance Agency, page 4.

Impact on Neighborhood Crime

Research on the relationship between affordable housing and crime identifies project scale as the most important factor in determining the impact on neighborhood crime rates. Multiple studies find that smaller projects (typically less than 50 units) have no impact on neighborhood crime, but that larger projects may result in increased crime. This finding was common across multiple types of affordable housing, including non-profit rental housing, public housing, and supportive housing.

Impact on Property Values

The MND should address the fact that there is evidence, that PSH facilities may lead to a decrease in property values when located in higher income areas. According to “The Impacts of Supportive Housing on Neighborhoods and Neighbors:

While the *average* relationship between this set of supportive housing facilities and proximate house prices was positive, not all site/neighborhood combinations in Denver experienced the same relationship. When we disaggregated our analysis to measure impacts for different common clusters of sites/neighborhoods, we found that the set of five supportive housing sites located in low-valued, heavily minority-occupied (typically majority Black-occupied) neighborhoods consistently evinced the positive price impacts noted above. By contrast, the site in the highest-value, overwhelmingly white-occupied neighborhood apparently had a *negative* effect on house prices, as did another (poorly maintained) site in a modestly valued, high-density core neighborhood having 24 percent of its population classified as Hispanic.¹⁵

...

Our central finding—that supportive housing generally has a positive impact on neighborhoods when done at a small scale, but that poorly managed properties can be deleterious to neighborhoods—implies that public policy would do well to encourage both public education and high-quality operation in the realm of supportive housing. Our findings also strongly suggest that the public sector pay strict attention to the ongoing operation, tenant management, and physical maintenance of supportive housing facilities.¹⁶

The environmental document should address the potential environmental consequences of changes in property values.

Increase in Water Demand

CEQA Guidelines Section 15155 requires the City to consult with the applicable water agency for any water-demand project, including residential development of more than 500 units,

¹⁵ “The Impacts of Supportive Housing on Neighborhoods and Neighbors”, The Urban Institute (October 1999), George Galster et al, page xii:

¹⁶ Ibid, page xiv:

as part of the preparation of the environmental document for the project (in this case the Ordinance). Given that the intent of the Ordinance is to increase the production of PSH, with a goal of at least an additional 2000 units over 10 years, as part of the preparation of the environmental document for the Ordinance, the City should have consulted with the applicable water agency to determine if the intended effects of the Ordinance were included in the most recently adopted urban water management plan and to prepare a water assessment approved at a regular or special meeting of that governing body.

Growth Inducing Impacts

Recent research has indicated the potential for the construction of PSH to induce in-migration of additional homeless into a Continuum of Care (CoC) area¹⁷ or inhibit out-migration of homeless. As explained by Corinth:

One potentially important factor that could affect estimates of associations between PSH and homelessness is migration. A CoC that expands its inventory may experience an inflow of homeless people seeking services or a reduced outflow of homeless people to other CoCs.¹⁸

Between 2007 and 2014, communities across the United States rapidly expanded the inventory of PSH beds for homeless individuals with disabling conditions. . . I find that each additional PSH bed was associated with between 0.04 and 0.12 fewer homeless people after one year. Causal effects identified on the basis of lagged funding decisions imply that one additional PSH bed reduces homeless counts by up to 0.10 people. Effect sizes of greater than 0.72 can be rejected at the 95% confidence level, ruling out the simple reasoning that adding one unit of housing reduces homelessness by one person. Relatively modest effects may be explained by some combination of poor targeting, differential exit rates into private housing from PSH relative to homelessness, incentives for remaining homeless, errors in homeless counts, and migration in response to expanded PSH. Indeed, PSH expansion in the rest of a state is associated with significant reductions in homeless counts within a community, consistent with homeless migration in response to PSH expansion.¹⁹

The environmental analysis for the proposed Ordinance should therefore address the growth-inducing impacts of the proposed Ordinance.

¹⁷ A Continuum of Care (CoC) is a regional or local planning body that coordinates housing and services funding for homeless families and individuals. There are 414 CoCs in the United States. The Los Angeles CoC covers the Los Angeles County area, but excludes the cities of Glendale, Pasadena and Long Beach.

¹⁸ Corinth, Kevin. "The Impact of Permanent Supportive Housing on Homeless Populations." *Journal of Housing Economics* 35 (2017) 69-84. Page 75. Available at: https://ac.els-cdn.com/S1051137715300474/1-s2.0-S1051137715300474-main.pdf?_tid=0cedc104-ba9c-11e7-a99d-00000aacb35f&acdnat=1509056685_fceb158ca8e69a34586fd1d9d46ba052

¹⁹ Corinth, Kevin. "The Impact of Permanent Supportive Housing on Homeless Populations." *Journal of Housing Economics* 35 (2017) 69-84. Page 80.

Cumulative Impacts

The PSH Ordinance is not the only ordinance currently under consideration by the City to address homelessness. The City is concurrently considering an Interim Motel Conversion Ordinance (CPC-2017-3409-CA; ENV-2017-3410-ND). Although the case numbers for the Motel Conversion appear to indicate that a Negative Declaration has been prepared for the Motel Conversion Ordinance, the Negative Declaration does not appear to be available on the City's website. The environmental document for the PSH Ordinance should include the cumulative projects resulting from the Motel Conversion Ordinance and should address the potential cumulative impacts associated with the City's full Comprehensive Homeless Strategy.

4. CONCLUSION

The City has not proceeded in the manner prescribe by law regarding the environmental documentation for the PSH Ordinance. The City must therefore take the following actions:

- Void the actions taken by the Planning Commission regarding the PSH Ordinance and the associated environmental documents;
- Prepare a single environmental document for the PSH Ordinance and circulate that document for public review in accordance with the requirements for projects of area-wide significance;
- Provide Notice of the Availability of the revised document to all those who have comment on the environmental documents or the PSH Ordinance, including Channel Law.

Thank you in advance for your thoughtful consideration of these issues of concern. I maybe contacted at 310-982-1760 or at jamie.hall@channellawgroup.com if you have any questions, comments or concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jamie T. Hall", is centered on the page. The signature is fluid and cursive.

Jamie T. Hall

ATTACHMENTS:

1. Channel Law letter dated October 30, 2017 regarding: Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV- 2017-3137-EAF) and Notification of Non-Compliance with CEQA with Regard to the Permanent Supportive Housing Ordinance and Proposed Redevelopment of Venice Dell Pacific Site located at 125 E. Venice Blvd (APN 4238-024-900 to 911)
2. Planning Commission Letter of Determination Regarding the PSH Ordinance and Associated CEQA Documents and the Planning Commission Meeting Audio Links for the December 14, 2017 Hearing, See Item 12.
3. City of Los Angeles Parcel Profile Reports (ZIMAS Reports) For Two Parcels In the Coastal Zone.
4. Location of PSH Ordinance Eligible Parcels.
5. Notice of Intent to Adopt MND from City's Website
6. CEQANet, State Clearinghouse Records for SCAG's RTP/SCS EIR.

Attachments To The
Channel Law Comments On The Environmental Documentation For, And The,
Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And
Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd
(APN 4238-024-900 To 911)
December 20, 2017

**ATTACHMENTS TO CHANNEL LAW LETTER DATED DECEMBER 20, 2017
REGARDING THE PERMANENT SUPPORTIVE HOUSING ORDINANCE
AND ASSOCIATED ENVIRONMENTAL DOCUMENTS**

Attachments:

1. Channel Law letter dated October 30, 2017 regarding: Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV- 2017-3137-EAF) and Notification of Non-Compliance with CEQA with Regard to the Permanent Supportive Housing Ordinance and Proposed Redevelopment of Venice Dell Pacific Site located at 125 E. Venice Blvd (APN 4238-024-900 to 911)
2. Planning Commission Letter of Determination Regarding the PSH Ordinance and Associated CEQA Documents and the Planning Commission Meeting Audio Links for the December 14, 2017 Hearing, See Item 12.
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Attachments To The
Channel Law Comments On The Environmental Documentation For, And The,
Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And
Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd
(APN 4238-024-900 To 911)
December 20, 2017

Attachment 1

Channel Law letter dated October 30, 2017 regarding: Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV- 2017-3137-EAF) and Notification of Non-Compliance with CEQA with Regard to the Permanent Supportive Housing Ordinance and Proposed Redevelopment of Venice Dell Pacific Site located at 125 E. Venice Blvd (APN 4238-024-900 to 911)

Channel Law Group, LLP

8200 Wilshire Blvd.
Suite 300
Beverly Hills, CA 90211

Phone: (310) 347-0050
Fax: (323) 723-3960
www.channellawgroup.com

JULIAN K. QUATTLEBAUM, III *
JAMIE T. HALL **
CHARLES J. McLURKIN

Writer's Direct Line: (310) 982-1760
jamie.hall@channellawgroup.com

-
*ALSO Admitted in Colorado
**ALSO Admitted in Texas

October 30, 2017

VIA ELECTRONIC MAIL

Los Angeles Planning Commission
Department of City Planning,
City Hall - Room 763,
200 North Spring Street,
Los Angeles CA 90012

Via email: cally.hardy@lacity.org

Re: Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137-EAF) and Notification of Non-Compliance with CEQA with Regard to the Permanent Supportive Housing Ordinance and Proposed Redevelopment of Venice Dell Pacific Site located at 125 E. Venice Blvd (APN 4238-024-900 to 911)

Dear Planning Commissioners:

This firm represents Venice Vision with regard to the proposed development at 125 E. Venice Boulevard as well as the City's proposed Permanent Supportive Housing Ordinance. The City released a Notice of a Public Hearing on the Permanent Supportive Housing Ordinance (proposed Ordinance). The Notice listed two meeting dates: September 25, 2017 and September 28, 2017 and indicated that last day to submit comments to staff was October 30, 2017. The Notice indicated that after October 30, 2017 comments should be addressed to the City Planning Commission, but did not provide the date by which such comments should be provided. The Notice also did not indicate when the City Planning Commission would consider the proposed Ordinance. In addition the Notice provides no information on California Environmental Quality Act (CEQA) document availability for the proposed Ordinance.

Permanent Supportive Housing Ordinance Lack of CEQA Document

The timeline provided in the presentation materials at the Staff Public Hearing of September 25, 2017 indicates that the CEQA document would be completed by the time the Draft Ordinance was released for public comment (see **Attachment 1**), yet it appears no CEQA

document has been completed. Lack of a CEQA document inhibits the ability of the public to comment on, or fully understand, the potential impacts of the proposed Ordinance.

Given the project numbers assigned to the proposed Ordinance (CPC-2017-3136-CA; ENV-2017-3137-EAF) it appears only the City's Environmental Assessment Form (EAF) may have been completed to date for the Ordinance, and this document is not available on the City's website. An Environmental Assessment Form is not one of the three types of environmental documents specified in CEQA and the CEQA Guidelines. No action should be taken on the Ordinance until the appropriate CEQA document has been prepared and circulated for public review per the CEQA Guidelines.¹

Please contact us and provide information on the timeline for CEQA compliance and the type of CEQA document to be prepared. Indicate how participation in the CEQA process will be coordinated with the Ordinance review and consideration process. Please provide any notices or other information regarding this Ordinance to us at the address listed on our letterhead.

Inaccurate Project Description

The Frequently Asked Questions (and answers) attached to the Notice provides the following information:

Qualified PSH Projects would be allowed in zones that allow a multifamily residential use (RD zone and less restrictive).²

Per State law in California SB 2 (2007), PSH projects are required to be treated the same as any residential use in the same zone. This means that PSH projects can be built anywhere a multifamily residential building is allowed under the Zoning Code. The proposed ordinance does not change where PSH units are currently allowed in the city.³

This is misleading. Allowable uses in the Public Facilities (PF) zone currently are as follows (emphasis added):

B. Use. The following regulations shall apply to publicly owned land classified in the "PF" Public Facilities Zone. No building, structure or land shall be used and no building or structure shall be erected, moved onto a site, structurally altered, enlarged or maintained, except for the following uses:

1. Farming and nurseries, under power transmission rights-of-way. (Amended by Ord. No. 181,188, Eff. 7/18/10.)
2. Public parking facilities located under freeway rights-of-way.
3. Fire stations and police stations.

¹ See for example CEQA Guidelines 15075, 15089 and 15090.

² Notice, page 1.

³ Notice, page 3.

4. (Amended by Ord. No. 173,492, Eff. 10/10/00.) Government buildings, structures, offices and service facilities including maintenance yards, provided, however, that those uses identified in Section 12.24U21 shall require conditional use approval pursuant to that section.

5. Public libraries not located inside public parks.

6. Post offices and related facilities.

7. Public health facilities, including clinics and hospitals.

8. Public elementary and secondary schools.

9. Any joint public and private development uses permitted **in the most restrictive adjoining zones** if approved by the Director utilizing the procedures described in Section 16.05E to H. The phrase “adjoining zones” refers to the zones on properties abutting, across the street or alley from or having a common corner with the subject property. If there are two or more different adjoining zones, then **only the uses permitted by the most restrictive zone shall be permitted.**

10. (Amended by Ord. No. 174,132, Eff. 9/3/01.) Conditional uses as allowed pursuant to Section 12.24 U 21 and Section 12.24 W 49 of this Code when the location is approved pursuant to the provisions of the applicable section.⁴

The proposed Ordinance amends the Public Facilities (PF) Zone, to allow for automatic rezoning to allow for a qualified Permanent Supportive Housing Project as follows (emphasis added):

SEC. 12.04.09. “PF” PUBLIC FACILITIES ZONE.

9. Any joint public and private development uses permitted in the most restrictive adjoining zones if approved by the Director utilizing the procedures described in Section 16.05 E to H. The phrase “adjoining zones” refers to the zones on properties abutting, across the street or alley from or having a common corner with the subject property. If there are two or more different adjoining zones, then only the uses permitted by the most restrictive zone shall be permitted. **If the joint public and private development is a Qualified Permanent Supportive Housing Project developed pursuant to Section 14.00 A.11 of this Code, the uses and standards permitted by the least restrictive zone within a 1,320 foot radius shall be permitted utilizing the procedures described therein.**

The ordinance thus allows for automatic rezoning of a PF zone consistent with **the least restrictive zone within a 1,320 foot radius** for a Permanent Supportive Housing (PSH) project. Under the Ordinance Qualified PSH Projects would be allowed in a zone that currently may not allow multifamily residential.

⁴ Los Angeles Municipal Code, Chapter 1, Section 12.04.09 B.

Please explain how the 1,320-foot radius figure was selected. Please indicate how much of the parcel with less restrictive zoning must be within the 1,320-foot radius for the PF zoned parcel to take on the less restrictive zoning.

Inadequate Notice - Failure to Disclose Creation of A New CEQA Exemption

CEQA applies to discretionary approvals.⁵ Section 16.05 B.2 of the City's Municipal Code (LAMC) defines a discretionary approval as including:

2. Discretionary Approval. (Amended by Ord. No. 184,827, Eff. 3/24/17.) An approval initiated by application of a property owner or representative related to the use of land including, but not limited to a:

- (a) zone change;
- (b) height district change;
- (h) coastal development permit;
- (i) development agreement;
- (k) density bonus greater than the minimums pursuant to Government Code Section 65915;
- (m) exception from a geographically specific plan;
- (o) public benefit projects; or
- (p) floor area deviation of less than 50,000 square feet pursuant to [14.5.7](#) of [Article 4.5](#) of the Los Angeles Municipal Code.

Currently PF zoning allows joint public and private development uses permitted **in the most restrictive adjoining zones** if approved by the Director utilizing the procedures described in **Section 16.05E to H**.

Section 16.05E(4) of the Planning and Zoning Code specifies the following:

4. The Director shall not approve or conditionally approve a site plan review for a development project unless an appropriate environmental review clearance has been prepared in accordance with the requirements of CEQA. (Amended by Ord. No. 185,052, Eff. 8/14/17.)

Please verify that this requirement would continue to apply to joint public and private development uses in the PF Zone and that they would continue to be subject to the requirement to complete environmental review pursuant to CEQA.

⁵ CEQA Guidelines 15002(i).

The Notice fails to disclose that the Ordinance creates a new CEQA exemption for PSH projects in two sections of the Ordinance, and that this new exemption is inconsistent with Public Resources Code (CEQA) Section 21159.21 and does not require compliance with Public Resources Code (PRC) Section 21159.23. PRC Section 21159.21 provides the criteria for qualifying for housing project exemptions⁶ and PRC Section 21159.23 provides for an exemption for low-income housing for residential housing consisting of 100 or fewer units.⁷ Pursuant to CEQA a low-income housing project would not qualify for an exemption “if there is a reasonable possibility that the project would have a significant effect on the environment or the residents of the project due to unusual circumstances or due to the related or cumulative impacts of reasonably foreseeable projects in the vicinity of the project.”⁸ Pursuant to PRC Section 21159.21, a low income housing project would not qualify for an exemption if it is inconsistent with any applicable general plan, specific plan or local coastal program; community-level environmental review has not been adopted or certified; existing utilities are not adequate to serve the project; the site is on a list of hazardous materials sites; the project would impact historical resources; or is in a hazards area.

In contrast, the Ordinance provides for an exemption for PSH projects, by adding the following language to Article 6.1 – Review of Development Projects, Section 16.05D – Exemptions,⁹ via Section 4 of the Ordinance:

Section 4. Subdivision 8 of Subsection D of Section 16.05 of the Los Angeles Municipal Code is added to read as follows:

8. A Qualified Permanent Supportive Housing Project developed pursuant to Section 14.00 A.11 of this Code and containing no more than 120 units, or no more than 200 units if it is located in the Greater Downtown Housing Incentive Area.¹⁰

The Ordinance thus allows for exemption of PSH projects with a larger number of units than would be allowed under existing CEQA exemptions. This change to existing CEQA exemptions, to create a less restrictive exemption for PSH projects is a discretionary action subject to CEQA review.

Please verify that under Section 4, PSH projects with more than 120 units outside of the Greater Downtown Housing Incentive Area would still be subject to CEQA. Please discuss how the threshold levels of 120 outside Downtown and 200 in Downtown were selected. If the Ordinance creates an exemption for a higher number of units than provided for under CEQA, it must be demonstrated that no significant impacts would occur.

In addressing whether it is appropriate to increase the size of the low-income housing (i.e. PSH) projects eligible for an exemption, the environmental document for the Ordinance should

⁶ See also CEQA Guidelines Section 15192.

⁷ See also CEQA Guidelines Section 15194.

⁸ CEQA (Public Resources Code) 21159.23(c).

⁹ Section 16.05D states: “Unless made discretionary by any other provision of law, the approval of any building permit for a development project which does not exceed the thresholds set forth in this subsection and Section 12.24U14 is ministerial and exempt from the requirements of the California Environmental Quality Act.

¹⁰ Page 9, Draft Ordinance 8/30/2017.

address the fact that the Minnesota Housing Finance Agency's Research and Evaluation Unit in their review of housing studies found:¹¹

Impact on Neighborhood Crime

Research on the relationship between affordable housing and crime identifies project scale as the most important factor in determining the impact on neighborhood crime rates. Multiple studies find that smaller projects (typically less than 50 units) have no impact on neighborhood crime, but that larger projects may result in increased crime. This finding was common across multiple types of affordable housing, including non-profit rental housing, public housing, and supportive housing.

Although Section 4's new CEQA exemption limits the size of PSH projects exempted from CEQA, Section 2 (11b) of the Ordinance also provides that:

The (Permanent Supportive Housing) application shall be approved by the Director of Planning through a ministerial Public Benefit process if the eligibility criteria and performance standards of this subsection are met.

As written, it is unclear whether Section 2(11b) would apply only to PSH projects "containing no more than 120 units, or no more than 200 units if it is located in the Greater Downtown Housing Incentive Area" per Section 4, or to all PSH projects. Do the size limits in Section 4 constitute "eligibility criteria"? This needs to be clarified. Please provide information on the correct reading of the two sections and the nature of limitations on PSH projects that would be exempted from CEQA under the Ordinance. Pursuant to PRC Section 21159.23, no exemption should every be granted if there is a reasonable possibility that the project would have a significant effect on the environment or the residents of the project due to unusual circumstances or due to the related or cumulative impacts of reasonably foreseeable projects in the vicinity of the project.

In addition to increasing the size of a low income housing project exempt from CEQA, as written, the Ordinance allows for automatic rezoning for Permanent Supportive Housing and deems the approval of any such housing project a ministerial act, thus exempting it from CEQA analysis, even though PSH projects are likely to fall within the definition of a discretionary approval pursuant to LAMC Section 16.05 B.2(a). The Notice fails to disclose this important aspect of the proposed Ordinance.

The City is thus appears to be considering approval of an Ordinance that increases the size of low income housing project eligible for an exemption and provides for a new automatic rezoning process for PSH projects in the PF Zone without conducting the required CEQA review, for either the Ordinance or requiring CEQA review at the project level. This is unacceptable and is contrary to CEQA. The City is required to comply with CEQA prior to consideration of the Ordinance. Failure to do so deprives decision-makers and the public of important information regarding both the details and implications of the Ordinance and its potential environmental impacts.

Inadequate Notice - Inadequate Project Description

¹¹ Discussion Paper, Impact of Affordable Housing on Communities and Households, Minnesota Housing Finance Agency, page 4.

Number and Location of PSH Developments - No information is provided in the Notice, or the non-existent CEQA document regarding the number and likely location of parcels zoned PF that may be automatically rezoned under the Ordinance to provide for Permanent Supportive Housing (PSH). This information is necessary in order to understand the details and implications of the Ordinance and its potential environmental impacts.

In addition, little information is provided on the likely locations of the Permanent Supportive Housing that the City seeks to have constructed in other zones throughout the City. This information is necessary in order to understand the details and implications of the Ordinance and its potential environmental impacts.

The Notice fails to disclose that the City has already issued a Request for Qualifications/Proposals (RFP) for the Affordable Housing Opportunity Sites.¹² The RFP identifies eight potential sites for permanent supportive housing and other types of affordable housing on City-owned land. Are there any other sites within the City anticipated to be used for Permanent Supportive Housing? Please provide information on potential sites as part of the environmental review of the Ordinance.

The following table summarized the information provided about those sites in the RFP:

SITES FOR PERMANENT SUPPORTIVE HOUSING AND OTHER TYPES OF AFFORDABLE HOUSING ON CITY-OWNED LAND IDENTIFIED IN CITY'S RFP			
LOT	PROPERTY IS ZONED	PARCEL SIZE IS APPROXIMATELY	NOTES
Lincoln Heights DOT Lot Number 697 2332-2340 N. Workman Street APN: 5204-016-901	[Q]C4-1XL-CDO RAS3-1VL-CDO	6,600 s.f.	One of five non-contiguous lots located behind North Broadway commercial storefronts. If a development strategy incorporates all of the Lincoln Heights DOT lots, replacement parking for all of the lots must be included.
Lincoln Heights DOT Lot Number 658 216-224 S. Avenue 24 APN: 5204-005-901	PF-1-CD0 RAS3-1VL-CDO	19,379 s.f.	One of five non-contiguous lots located behind North Broadway commercial storefronts. Replacement public parking does not need to be assumed in the development submission for a single Lincoln Heights DOT lot, though it may be incorporated as

¹² Submission deadline: September 15, 2016. Available at: <http://cao.lacity.org/AHOSRFQ.PDF>

SITES FOR PERMANENT SUPPORTIVE HOUSING AND OTHER TYPES OF AFFORDABLE HOUSING ON CITY-OWNED LAND IDENTIFIED IN CITY'S RFP			
LOT	PROPERTY IS ZONED	PARCEL SIZE IS APPROXIMATELY	NOTES
			part of the eventual project.
Lincoln Heights DOT Lot Lot Number 659 2331-2337 N. Workman Street and 2332-2338 N. Daly APN: 5204-011-903	PF-1-CD0 RAS3-1VL-CDO	37,200 s.f.	One of five non-contiguous lots located behind North Broadway commercial storefronts.
Lincoln Heights DOT Lot Lot Number 661 2416-2422 N. Workman Street APN: 5204-015-901	PF-1-CD0 RAS3-1VL-CDO	16,502 s.f.	One of five non-contiguous lots located behind North Broadway commercial storefronts.
Lincoln Heights DOT Lot Lot Number 660 154 -164 S. Avenue 24 APN: 5204-004-901	PF-1-CD0 RAS3-1VL-CDO	20,295 s.f.	One of five non-contiguous lots located behind North Broadway commercial storefronts.
Hillside Parcel 11681 W. Foothill Blvd, Sylmar APN: 2530-008-901	(T)RD2-1	132,095 s.f.	
Imperial Lot 283 W. Imperial Highway APN: 6074-024-900	C2-1	17,385 s.f.	
Thatcher Yard 3233 S. Thatcher Ave APN: 4229-002-901	(Q) PF-1XL RD1.5	93,347 s.f.	A Coastal Development Permit from the City of Los Angeles will be required, and Coastal Commission approval may be required on appeal.
Old West L.A. Animal Shelter 11950 Missouri Ave APN: 4259-020-900	PF-1-XL and M2-1 R3	32,642 s.f.	
Old Fire Station #5 6621 W. Manchester Ave	R1-1 R3	19,507 s.f.	Improved with an abandoned fire station.

SITES FOR PERMANENT SUPPORTIVE HOUSING AND OTHER TYPES OF AFFORDABLE HOUSING ON CITY-OWNED LAND IDENTIFIED IN CITY'S RFP			
LOT	PROPERTY IS ZONED POTENTIAL FUTURE ZONING IS	PARCEL SIZE IS APPROXIMATELY	NOTES
APN: 4112-029-900			
Venice Dell Pacific Site 125 E Venice Blvd. APN: 4238-024-900 to 911	OS-1SL-O R3	122,171 s.f.	Developments must comply with the Venice Specific Plan. A Coastal Development Permit from the City of Los Angeles will be required, and approval from the California Coastal Commission will also be required.
Old Fire Station #53 438 N. Mesa Street APN: 7449-009-900	R2-1X	8,990 s.f.	The property is improved with an abandoned fire station.
Source: http://cao.lacity.org/AHOSRFQ.PDF			

Please provide information on the number of units that could potentially be developed on each of these sites under the Ordinance with an explanation of how the number was calculated and Ordinance provisions were applied.

According to the RFT, two of the sites, Thatcher Yard and the Venice Dell Pacific Site, require a Coastal Development Permit. Under Section 16.05 B.2 of the LAMC, preparation of an environmental document is required for this type of “discretionary” permit. However, proposed Section 2(11b) of the Ordinance would exempt the eight sites from environmental review. Pursuant to CEQA Guidelines Section 15268(d):

Where a project involves an approval that contains elements of both a ministerial action and a discretionary action, the project will be deemed to be discretionary and will be subject to the requirements of CEQA.

At a minimum, project level environmental review will be required for a PSH project on either the Thatcher Yard or Venice Dell Pacific Site. The Ordinance should be amended to require compliance with CEQA Guidelines Section 15268(d).

Concession and Incentives - Increased Density, Height etc. - Section 2, 11 – Permanent Supportive Housing (d – Zoning Compliance) states that (emphasis added):

(1) Minimum Lot Area per Dwelling Unit or Guest Room. In zones where multiple dwelling uses are permitted (R3 and less restrictive), the number of allowable dwelling units or guest rooms shall not be subject to the otherwise maximum allowable residential density under any applicable zoning ordinance and/or specific plan. In the RD1.5 Zone, the minimum lot area per dwelling unit or guest room shall be 500 square feet. **All applicable standards pertaining to**

height and floor area under any applicable zoning ordinance and/or specific plan or overlay shall apply.

However, Section 2, 11 – Permanent Supportive Housing (e - Additional Concessions or Incentives) states (emphasis added):

(d) Zoning Compliance. A Qualified Permanent Supportive Housing Project meeting the requirements in Paragraph (c) and the performance standards in Paragraph (g) must comply with all objective requirements in any applicable zoning code, specific plan or overlay district regulations **except**:

Section 2,11(d) then provides for a PSH project to obtain up to four concessions or incentives, from a list that includes: decreased yard/setback requirements; increased lot coverage limits; increased floor area ratio; increase height; decreased open space, averaging floor area ratio; parking or open space across two or more contiguous parcels.

Section 2,11(d)'s statement that "All applicable standards pertaining to height and floor area under any applicable zoning ordinance and/or specific plan or overlay shall apply," appears contradicted by Section 2,11(e). Please explain how this apparent contradiction would be resolved by providing examples of PSH projects in several zones, as they would look under existing zoning, as compared to under the Ordinance. It is important for the environmental document for the Ordinance to address consistency of the Ordinance with existing area plans and design guidelines.

Inadequate Requirements for the Provision Of Supportive Services

Although the Ordinance requires that PSH projects record a covenant acceptable to the Housing and Community Investment Department (HCIDLA) that reserves and maintains the number of dwelling units designated as restricted affordable for at least 55 years from the issuance of the Certificate of Occupancy, it does not appear that the Ordinance similarly requires the provision of supportive services on an on-going basis for the life of the project, or provides a mechanism to ensure that supportive services are being provided consistently over the life of the project and that they are adequate for the needs of a PSH project's target population. In addition, the Ordinance does not establish minimum required levels of support services to be provided at each PSH.

Whereas PSH projects are generally not associated with an increase in crime and a decrease in property values¹³, the same is not true for shelters or public housing projects that do

¹³ There is some evidence, however, that PSH facilities may lead to a decrease in property values when located in higher income areas. According to "The Impacts of Supportive Housing on Neighborhoods and Neighbors, The Urban Institute (October 1999), George Galster et al, page xii:

While the *average* relationship between this set of supportive housing facilities and proximate house prices was positive, not all site/neighborhood combinations in Denver experienced the same relationship. When we disaggregated our analysis to measure impacts for different common clusters of sites/neighborhoods, we found that the set of five supportive housing sites located in low-valued, heavily minority-occupied (typically majority Black-occupied) neighborhoods consistently evinced the positive price impacts noted above. By contrast, the site in the highest-value, overwhelmingly white-occupied neighborhood apparently had a *negative* effect on house prices, as did another (poorly maintained) site in a modestly valued, high-density core neighborhood having 24 percent of its population classified as Hispanic.

not provide supportive services for the target populations specified in Section 2, 11(a)(2) – Target Population of the Ordinance, or for poorly managed or maintained facilities.¹⁴ The nature and quality of the supportive services are important to ensuring surrounding neighborhoods will not experience an increase in crime or decrease in property values.

Issues to Address in the Environmental Analysis of the Proposed Ordinance

In addition to addressing the impact on the Ordinance on consistency with existing area plans and regulations, as well as the other CEQA Checklist issue areas, the environmental document for the Ordinance should address:

Growth Inducing Impacts - Recent research has indicated the potential for the construction of PSH to induce in-migration of additional homeless into a Continuum of Care (CoC) area¹⁵ or inhibit out-migration of homeless. As explained by Corinth:

One potentially important factor that could affect estimates of associations between PSH and homelessness is migration. A CoC that expands its inventory may experience an inflow of homeless people seeking services or a reduced outflow of homeless people to other CoCs.¹⁶

Between 2007 and 2014, communities across the United States rapidly expanded the inventory of PSH beds for homeless individuals with disabling conditions. . . I find that each additional PSH bed was associated with between 0.04 and 0.12 fewer homeless people after one year. Causal effects identified on the basis of lagged funding decisions imply that one additional PSH bed reduces homeless counts by up to 0.10 people. Effect sizes of greater than 0.72 can be rejected at the 95% confidence level, ruling out the simple reasoning that adding one unit of housing reduces homelessness by one person. Relatively modest effects may be explained by some combination of poor targeting, differential exit rates into private housing from PSH relative to homelessness, incentives for remaining homeless, errors in homeless counts, and migration in response to expanded PSH. Indeed, PSH expansion in the rest of a state is associated with significant reductions in homeless counts within a community, consistent with homeless migration in response to PSH expansion.¹⁷

¹⁴ Ibid, page xiv:

Our central finding—that supportive housing generally has a positive impact on neighborhoods when done at a small scale, but that poorly managed properties can be deleterious to neighborhoods—implies that public policy would do well to encourage both public education and high-quality operation in the realm of supportive housing. Our findings also strongly suggest that the public sector pay strict attention to the ongoing operation, tenant management, and physical maintenance of supportive housing facilities.

¹⁵ A Continuum of Care (CoC) is a regional or local planning body that coordinates housing and services funding for homeless families and individuals. There are 414 CoCs in the United States. The Los Angeles CoC covers the Los Angeles County area, but excludes the cities of Glendale, Pasadena and Long Beach.

¹⁶ Corinth, Kevin. “The Impact of Permanent Supportive Housing on Homeless Populations.” *Journal of Housing Economics* 35 (2017) 69-84. Page 75. Available at: https://ac.els-cdn.com/S1051137715300474/1-s2.0-S1051137715300474-main.pdf?_tid=0cedc104-ba9c-11e7-a99d-00000aacb35f&acdnat=1509056685_fceb158ca8e69a34586fd1d9d46ba052

¹⁷ Corinth, Kevin. “The Impact of Permanent Supportive Housing on Homeless Populations.” *Journal of Housing Economics* 35 (2017) 69-84. Page 80.

The environmental analysis for the proposed Ordinance should therefore address the growth-inducing impacts of the proposed Ordinance.

Cumulative Impacts – The PSH Ordinance is not the only ordinance currently under consideration by the City to address homelessness. The City is concurrently considering an Interim Motel Conversion Ordinance (CPC-2017-3409-CA; ENV-2017-3410-ND). Although the case numbers for the Motel Conversion appear to indicate that a Negative Declaration has been prepared for the Motel Conversion Ordinance, the Negative Declaration does not appear to be available on the City’s website. The environmental document for the PSH Ordinance should include the cumulative projects resulting from the Motel Conversion Ordinance and should address the potential cumulative impacts associated with the City’s full Comprehensive Homeless Strategy.

Increase in Water Demand - According to page 1 of the Background and Frequently Asked Questions portion of the Notice:

According to the City’s Comprehensive Homeless Strategy, a total of 1,000 PSH units need to be constructed annually to house the City’s homeless population – a significant increase from the current annual supply of 300 units. To help meet these goals, the Los Angeles electorate adopted Measure HHH in November 2016, a voter initiative that will create \$1.2 billion in new funding over the next decade to construct PSH units. The voters also adopted Measure H in March 2017, a County-wide measure that will provide ongoing funding to support rent subsidies and services for PSH, among other homeless services.

It thus appears the City is seeking to increase the production of PSH by 700 units per year. CEQA Guidelines Section 15155 requires the City to consult with the applicable water agency for any water-demand project, including residential development of more than 500 units, as part of the preparation of the environmental document for the project (in this case the Ordinance). Given that the intent of the Ordinance is to increase the production of PSH, with a goal of at least an additional 700 units per year, as part of the preparation of the environmental document for the Ordinance, the City should consult with the applicable water agency to determine if the intended effects of the Ordinance were included in the most recently adopted urban water management plan and to prepare a water assessment approved at a regular or special meeting of that governing body.

The Ordinance Needs to Be Amended

The Ordinance needs to be amended to:

- Remove the new CEQA exemption for PSH projects; instead the existing CEQA low-income housing exemption should be applied.
- Include language in the Ordinance to make clear that pursuant to CEQA Guidelines Section 15268(d) where a PSH project “involves an approval that contains elements of both a ministerial action and a discretionary action, the project will be deemed to be discretionary and will be subject to the requirements of CEQA.”

- Allow for automatic rezoning of only those parcels addressed in the environmental document for the proposed Ordinance, or specifically addressed in the environmental document for the applicable area plan.
- Add requirements for provision of an appropriate level of supportive services to be maintained over the life of individual PSH projects.

Conclusion

Thank you in advance for your thoughtful consideration of these issues of concern. I may be contacted at 310-982-1760 or at jamie.hall@channellawgroup.com if you have any questions, comments or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Jamie T. Hall". The signature is fluid and cursive, with the first name "Jamie" being the most prominent part.

Jamie T. Hall

ATTACHMENTS:

1. Page showing CEQA Timeline presented at City's informational meeting on the PSH Ordinance

cc: Councilman Mike Bonin
City Attorney Mike Feuer
Members of Los Angeles City Council

Project Timeline

		Preparation of CEQA Document		Public Hearings	
	Initial Outreach		Public Comment Period		
Project Launch	Identify Draft Ordinance Concepts		Release Draft Ordinance	City Planning Commission	City Council Adoption
Summer 2016	Fall 2016 – Spring 2017		Summer 2017	Fall 2017	Winter 2017-18

October 30, 2017

*Deadline to submit public comment to
cally.hardy@lacity.org*



Attachments To The
Channel Law Comments On The Environmental Documentation For, And The,
Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And
Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd
(APN 4238-024-900 To 911)
December 20, 2017

Attachment 2
Planning Commission Letter of Determination Regarding the PSH
Ordinance and Associated CEQA Documents and the Planning
Commission Meeting Audio Links for the December 14, 2017 Hearing,
See Item 12.



LOS ANGELES CITY PLANNING COMMISSION

200 North Spring Street, Room 532, Los Angeles, California, 90012-4801, (213) 978-1300

www.planning.lacity.org

LETTER OF DETERMINATION

MAILING DATE: DEC 19 2017

Case No.: CPC-2017-3136-CA

Council Districts: All

CEQA: ENV-2017-3137-MND

SCAG 2016-2040 RTP/SCS PEIR (SCH No. 2015031035)

Plan Areas: All

Project Site: Citywide

Applicant: City of Los Angeles
Representative: Cally Hardy, Planning Assistant

At its meeting of **December 14, 2017**, the Los Angeles City Planning Commission took the actions below in conjunction with the approval of the proposed ordinance:

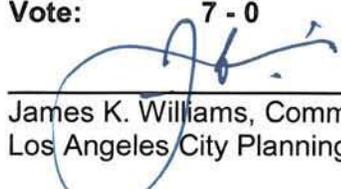
An ordinance amending Sections 12.03, 12.04.09, 14.00, and 16.05 of the Los Angeles Municipal Code establishing regulations to facilitate the production of Permanent Supportive Housing.

1. **Found** pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including Mitigated Negative Declaration No. ENV-2017-3137-MND (Mitigated Negative Declaration), and all comments received, with imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; **Found** that the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; **Found** the mitigation measures have been made enforceable conditions on the project; and adopt the Mitigated Negative Declaration; and **Adopted** the Mitigated Negative Declaration and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;
2. **Approve** and **recommend** that the City Council **find**, based on their independent judgement, after consideration of the whole of the administrative record, including the SCAG 2016-2040 RTP/SCS PEIR (SCH No. 2015031035), certified on April 7, 2016 (EIR) and the Addendum prepared for the PSH Ordinance (Addendum), the project was assessed in the EIR and pursuant to the CEQA Guidelines, Sections 15162 and 15164 and the Addendum that no major revisions to the EIR are required and no subsequent EIR, or negative declaration is required for approval of the project;
3. **Adopted** the staff report as the Commission report on the subject;
4. **Approved** and **recommended** that the City Council **adopt** the proposed ordinance, as amended by the Commission, subject to review by the City Attorney as to form and legality; and
5. **Adopted** and **recommended** that the City Council **adopt** the attached Findings.

The vote proceeded as follows:

Moved: Ambroz
Second: Khorsand
Ayes Choe, Dake Wilson, Millman, Padilla Campos, Perlman
Absent: Mitchell, Mack

Vote: 7 - 0



James K. Williams, Commission Executive Assistant II
Los Angeles City Planning Commission

Effective Date/Appeals: The decision of the Los Angeles City Planning Commission is final and not appealable.

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

Attachments: Ordinance, Findings

c: Ken Bernstein, Principal Planner
Arthi Varma, Principal City Planner
Claire Bowin, Senior City Planner
Matthew Glesne, City Planner
Cally Hardy, Planning Assistant

Información en Español acerca de esta junta puede ser obtenida Llamando al (213) 978-1300

COMMISSION MEETING AUDIO

CITY PLANNING COMMISSION
REGULAR MEETING AGENDA
THURSDAY, DECEMBER 14, 2017 after 8:30 a.m.
LOS ANGELES CITY HALL, COUNCIL CHAMBERS ROOM 340
200 NORTH SPRING STREET, LOS ANGELES, CALIFORNIA 90012

CLICK ON THE [BLUE](#) LINKS BELOW TO LISTEN TO AUDIO FROM THE MEETING

**TO REQUEST A COPY ON COMPACT DISC,
PLEASE CONTACT THE DEPARTMENT OF CITY PLANNING PUBLICATIONS AT (213) 978-1255**

1. [**DIRECTOR'S REPORT**](#)

- Update on City Planning Commission Status Reports and Active Assignments
- Legal actions and issues update
- Other Items of Interest

2. [**COMMISSION BUSINESS**](#)

- Advance Calendar
- Commission Requests
- Minutes of Meeting – November 9, 2017; November 16, 2017

3. [**NEIGHBORHOOD COUNCIL PRESENTATION**](#)

Presentation by Neighborhood Council representatives on any Neighborhood Council resolution, or community impact statement filed with the City Clerk, which relates to any agenda item listed or being considered on this agenda. The Neighborhood Council representative shall provide the Board or Commission with a copy of the Neighborhood Council's resolution or community impact statement. THESE PRESENTATIONS WILL BE TAKEN AT THE TIME THE AGENDA ITEM IS CALLED FOR CONSIDERATION.

4. [**GENERAL PUBLIC COMMENT**](#)

The Commission shall provide an opportunity in open meetings for the public to address it **on non-agenda items**, for a cumulative total of up to thirty (30) minutes, on items of interest to the public that are within the subject matter jurisdiction of the Commission.

PERSONS WISHING TO SPEAK MUST SUBMIT A SPEAKER'S REQUEST FORM. ALL REQUESTS TO ADDRESS THE COMMISSION ON **NON-AGENDA ITEMS** AND ITEMS OF INTEREST TO THE PUBLIC THAT ARE WITHIN THE JURISDICTION OF THE COMMISSION MUST BE SUBMITTED PRIOR TO THE COMMENCEMENT OF THE PUBLIC COMMENT PERIOD.

5. **RECONSIDERATIONS**

- 5a. **MOTIONS TO RECONSIDER** - The Commission may make a motion to reconsider a Commission Action on any agenda items from its previous meeting, consistently with the Commission Rule 8.3, provided the Commission retains jurisdiction over the matter.
- 5b. **MERITS OF ANY ITEM THE COMMISSION HAS VOTED TO RECONSIDER** – If a majority of the Commission has approved a motion to reconsider a Commission Action, the Commission may address the merits of the original Commission Action.

6. **CONSENT CALENDAR (None)**

Consent Calendar items are considered to be not controversial and will be treated as one agenda item. The Consent Calendar will be enacted by one motion. There will be no separate discussion of these items unless the item is removed from the Consent Calendar, in which event the item will be considered as time allows on the regular agenda.

- 6a. **CPC-2014-4942-ZC-HD-DB-SPR**
CEQA: ENV-2014-4943-MND
Plan Area: Wilshire

Council District: 1 - Cedillo
Last Day to Act: 12-19-17

PUBLIC HEARING – Completed July 24, 2017

PROJECT SITE: 2501 – 2515 West Olympic Boulevard;
980 – 992 South Arapahoe Street;
981 South Hoover Street

PROPOSED PROJECT:

Construction of a new seven-story, mixed-use development consisting of 173 residential units and 36,990 square feet of commercial uses with a total of 262 on-site vehicle parking spaces (201 spaces for residential uses, 61 spaces for commercial uses) located within one ground floor parking level and two subterranean parking levels, on a Project Site that consists of nine (9) contiguous lots totaling 51,949 square feet in size, and is currently vacant. The building will measure approximately 92 feet in height and contain approximately 183,190 square feet of floor area. As part of this application, the Department of City Planning has initiated a Zone Change and Height District Change from C2-2 to (T)(Q)C2-1 as a technical correction to a recorded mapping error which will create consistency between the Zone designation and the General Plan Land Use designation for the C2 zoned lots.

REQUESTED ACTIONS:

1. Pursuant to CEQA Guidelines Section 15074(b), consideration of the whole of the administrative record, including the Mitigated Negative Declaration, No. ENV-2014-4943-MND (“Mitigated Negative Declaration”), Errata dated November 17, 2017, all comments received, the imposition of mitigation measures and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;

ACTIONS INITIATED BY THE DIRECTOR OF PLANNING:

2. Pursuant to Los Angeles Municipal Code (LAMC) Section 12.32 F, a Zone Change and Height District Change from C2-2 to (T)(Q)C2-1;

ACTIONS REQUESTED BY THE APPLICANT:

3. Pursuant to Section 12.22 A.25(g)(2) a 33 percent Density Bonus for a project reserving 15 percent of the base dwelling units, or 20 units, for Very Low Income Households, in conjunction with Parking Option 1 and the following three (3) On-Menu Incentives:

REQUESTED ACTIONS:

1. Pursuant to CEQA Guidelines, Section 15332, an Exemption from CEQA, and that there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies; and
2. Pursuant to Section 12.22 A.25(g)(3) of the Los Angeles Municipal Code, a 32.5 percent Density Bonus for a project totaling 26 residential dwelling units reserving 10 percent, or two (2) units, for Very Low Income Households, and utilizing parking option 1, with one Off-Menu Incentive to allow a maximum Floor Area Ratio (FAR) of 2.01:1 in lieu of a 1:1, otherwise permitted pursuant to Ordinance No. 173,606 and Section 15.A of the Colorado Boulevard Specific Plan.

Applicant: Imad Boukai, General Procurement
Representative: Heather Lee

Staff: Azeen Khanmalek, City Planning Associate
azeen.khanmalek@lacity.org
(213) 978-1336

****THE FOLLOWING ITEMS WILL BE CONSIDERED AFTER 12:00 PM****

12. [CPC-2017-3136-CA](#)
CEQA: ENV-2017-3137-MND
SCAG 2016-2040 RTP/SCS PEIR (SCH No. 2015031035)
Plan Areas: All

Council Districts: All
Last Day to Act: N/A

PUBLIC HEARING – Completed September 25, 2017 and September 28, 2017

PROJECT AREA: Citywide

PROPOSED ORDINANCE:

An ordinance amending Sections 12.03, 12.04.09, 14.00, and 16.05 of the Los Angeles Municipal Code establishing regulations to facilitate the production of Permanent Supportive Housing.

RECOMMENDED ACTIONS:

1. Pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including Mitigated Negative Declaration No. ENV-2017-3137-MND (Mitigated Negative Declaration), and all comments received, with imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; find the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; find the mitigation measures have been made enforceable conditions on the project; and adopt the Mitigated Negative Declaration;
2. Approve and recommend that the City Council find, based on their independent judgement, after consideration of the whole of the administrative record, including the SCAG 2016-2040 RTP/ SCS PEIR (SCH No. 2015031035), certified on April 7, 2016 (EIR) and the Addendum prepared for the PSH Ordinance (Addendum), the project was assessed in the EIR and pursuant to the CEQA Guidelines, Sections 15162 and 15164 and the Addendum that no major revisions to the EIR are required and no subsequent EIR, or negative declaration is required for approval of the project;
3. Approve and recommend that the City Council adopt the proposed ordinance;
4. Adopt the Staff Report as the Commission Report on the subject; and
5. Adopt the Findings.

Applicant: City of Los Angeles

Staff: Cally Hardy, Planning Assistant
cally.hardy@lacity.org
(213) 978-1643

13. [CPC-2017-3409-CA](#)
CEQA: ENV-2017-4476-CE,
ENV-2017-3410-ND
Plan Areas: All

Council Districts: All
Last Day to Act: N/A

PUBLIC HEARINGS – Completed September 25, 2017 and September 28, 2017

PROJECT AREA: Citywide

PROPOSED ORDINANCE:

An ordinance amending Sections 12.03, 14.00 and 151.02 of the Los Angeles Municipal Code establishing regulations to facilitate the use of existing hotels and motels for Supportive Housing and/or Transitional Housing.

RECOMMENDED ACTIONS:

1. Determine, based on the whole of the administrative record, that the proposed ordinance is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15301, and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines Section 15300.2 applies;
2. Approve and recommend that the City Council find, pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including the Negative Declaration, No. ENV-2017-3410-ND (“Negative Declaration”), and all comments received, there is no substantial evidence that the project will have a significant effect on the environment; find the Negative Declaration reflects the independent judgment and analysis of the City; and adopt the Negative Declaration;
3. Approve and recommend that the City Council adopt the proposed ordinance;
4. Adopt the Staff Report as the Commission Report on the subject; and
5. Adopt the Findings.

Applicant: City of Los Angeles

Staff: Cally Hardy, Planning Assistant
cally.hardy@lacity.org
(213) 978-1643

14. [CPC-2017-4546-CA](#)
CEQA: ENV-2017-3361-SE
Plan Areas: All

Council Districts: All
Last Day to Act: N/A

PUBLIC HEARING REQUIRED

PROJECT AREA: Citywide

PROPOSED ORDINANCE:

An ordinance enacting restrictions on commercial advertising of cannabis, cannabis products, commercial cannabis activity, or businesses engaged in any commercial cannabis activity on signs.

RECOMMENDED ACTIONS:

1. Determine that based on the whole of the administrative record, the project is exempt from CEQA pursuant to California Business and Professions Code Section 26055(h) on the basis that the project will adopt ordinances, rules and/or regulations that will require discretionary review under CEQA to approve licenses to engage in commercial cannabis activity in the City of Los Angeles;
2. Approve and Recommend that the City Council adopt the proposed Ordinance;

3. Adopt the Staff Report as the Commission's Report on the subject; and
4. Adopt the Findings.

Applicant: City of Los Angeles

Staff: Niall Huffman, City Planning Associate
niall.huffman@lacity.org
(213) 978-3405

The next scheduled regular meeting of the City Planning Commission will be held on:

Thursday, December 21, 2017

Van Nuys City Hall
Council Chamber, 2nd Floor
14410 Sylvan Street
Van Nuys, CA 91401

An Equal Employment Opportunity/Affirmative Action Employer

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate. The meeting facility and its parking are wheelchair accessible. Translation services, sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services must be requested **7 days prior to the meeting** by calling the Planning Commission Secretariat at (213) 978-1300 or by email at CPC@lacity.org.

Attachments To The
Channel Law Comments On The Environmental Documentation For, And The,
Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And
Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd
(APN 4238-024-900 To 911)
December 20, 2017

Attachment 3
City of Los Angeles Parcel Profile Reports (ZIMAS Reports) For Two
Parcels In the Coastal Zone.



City of Los Angeles Department of City Planning

12/18/2017 PARCEL PROFILE REPORT

PROPERTY ADDRESSES

125 E VENICE BLVD
125 E SOUTH VENICE BLVD

ZIP CODES

90291

RECENT ACTIVITY

DIR-2008-4703-DI

CASE NUMBERS

CPC-2014-1456-SP
CPC-2005-8252-CA
CPC-2000-4046-CA
CPC-1998-119
CPC-1995-148-GPC-ZC
CPC-1987-648-ICO
CPC-1986-824-GPC
CPC-1984-226-SP
CPC-1972-24385
CPC-17630
ORD-175694
ORD-175693
ORD-172897
ORD-172019
ORD-170998-SA10
ORD-168999
ORD-164844-SA2190
ORD-145252
ORD-130336
DIR-2014-2824-DI
ZA-1992-484-PAD
ENV-2014-1458-EIR
ENV-2005-8253-ND
ENV-2004-2691-CE
ENV-2002-6836-SP
ENV-2001-846-ND
ED-73-307-ZC
AFF-36536

Address/Legal Information

PIN Number	106-5A145 436
Lot/Parcel Area (Calculated)	1,337.0 (sq ft)
Thomas Brothers Grid	PAGE 671 - GRID H6
Assessor Parcel No. (APN)	4238024900
Tract	SHORT LINE BEACH SUBDIVISION NO. 1
Map Reference	M B 2-59
Block	9
Lot	36
Arb (Lot Cut Reference)	1
Map Sheet	106-5A145

Jurisdictional Information

Community Plan Area	Venice
Area Planning Commission	West Los Angeles
Neighborhood Council	Venice
Council District	CD 11 - Mike Bonin
Census Tract #	2739.02
LADBS District Office	West Los Angeles

Planning and Zoning Information

Special Notes	None
Zoning	OS-1XL-O ZI-2471 Coastal Zone ZI-2452 Transit Priority Area in the City of Los Angeles ZI-2406 Director's Interpretation of the Venice SP for Small Lot Subdivisio
General Plan Land Use	Open Space
General Plan Note(s)	Yes
Hillside Area (Zoning Code)	No
Specific Plan Area	Los Angeles Coastal Transportation Corridor
Subarea	None
Specific Plan Area	Venice Coastal Zone
Subarea	Venice Canals
Special Land Use / Zoning	None
Design Review Board	No
Historic Preservation Review	No
Historic Preservation Overlay Zone	None
Other Historic Designations	None
Other Historic Survey Information	None
Mills Act Contract	None
CDO: Community Design Overlay	None
CPIO: Community Plan Imp. Overlay	None
Subarea	None
CUGU: Clean Up-Green Up	None
NSO: Neighborhood Stabilization Overlay	No
POD: Pedestrian Oriented Districts	None
SN: Sign District	No
Streetscape	No
Adaptive Reuse Incentive Area	None

This report is subject to the terms and conditions as set forth on the website. For more details, please refer to the terms and conditions at zimas.lacity.org
(*) - APN Area is provided "as is" from the Los Angeles County's Public Works, Flood Control, Benefit Assessment.

Ellis Act Property	No
Rent Stabilization Ordinance (RSO)	No
Transit Oriented Communities (TOC)	Tier 1
CRA - Community Redevelopment Agency	None
Central City Parking	No
Downtown Parking	No
Building Line	None
500 Ft School Zone	No
500 Ft Park Zone	No

Assessor Information

Assessor Parcel No. (APN)	4238024900
APN Area (Co. Public Works)*	0.635 (ac)
Use Code	2700 - Commercial - Parking Lot (Commercial Use Property) - Lots - Patron or Employee - One Story
Assessed Land Val.	\$230,543
Assessed Improvement Val.	\$0
Last Owner Change	12/12/1960
Last Sale Amount	\$0
Tax Rate Area	67
Deed Ref No. (City Clerk)	1-792
Building 1	No data for building 1
Building 2	No data for building 2
Building 3	No data for building 3
Building 4	No data for building 4
Building 5	No data for building 5

Additional Information

Airport Hazard	None
Coastal Zone	Coastal Zone Commission Authority Dual Jurisdictional Coastal Zone
Farmland	Area Not Mapped
Urban Agriculture Incentive Zone	YES
Very High Fire Hazard Severity Zone	No
Fire District No. 1	No
Flood Zone	None
Watercourse	No
Hazardous Waste / Border Zone Properties	No
Methane Hazard Site	Methane Zone
High Wind Velocity Areas	No
Special Grading Area (BOE Basic Grid Map A-13372)	No
Oil Wells	None

Seismic Hazards

Active Fault Near-Source Zone	
Nearest Fault (Distance in km)	5.5738776
Nearest Fault (Name)	Santa Monica Fault
Region	Transverse Ranges and Los Angeles Basin
Fault Type	B
Slip Rate (mm/year)	1.00000000
Slip Geometry	Left Lateral - Reverse - Oblique
Slip Type	Moderately / Poorly Constrained
Down Dip Width (km)	13.00000000
Rupture Top	0.00000000
Rupture Bottom	13.00000000
Dip Angle (degrees)	-75.00000000
Maximum Magnitude	6.60000000

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Alquist-Priolo Fault Zone	No
Landslide	No
Liquefaction	Yes
Preliminary Fault Rupture Study Area	No
Tsunami Inundation Zone	Yes

Economic Development Areas

Business Improvement District	VENICE BEACH
Promise Zone	None
Renewal Community	No
Revitalization Zone	None
State Enterprise Zone	None
Targeted Neighborhood Initiative	None

Public Safety

Police Information

Bureau	West
Division / Station	Pacific
Reporting District	1441

Fire Information

Bureau	West
Batallion	4
District / Fire Station	63
Red Flag Restricted Parking	No

CASE SUMMARIES

Note: Information for case summaries is retrieved from the Planning Department's Plan Case Tracking System (PCTS) database.

Case Number:	CPC-2014-1456-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	SPECIFIC PLAN AMENDMENT
Case Number:	CPC-2005-8252-CA
Required Action(s):	CA-CODE AMENDMENT
Project Descriptions(s):	AN ORDINANCE ESTABLISHING PERMANENT REGULATIONS IMPLEMENTING THE MELLO ACT IN THE COASTAL ZONE.
Case Number:	CPC-2000-4046-CA
Required Action(s):	CA-CODE AMENDMENT
Project Descriptions(s):	
Case Number:	CPC-1998-119
Required Action(s):	Data Not Available
Project Descriptions(s):	
Case Number:	CPC-1995-148-GPC-ZC
Required Action(s):	GPC-GENERAL PLAN/ZONING CONSISTENCY (AB283) ZC-ZONE CHANGE
Project Descriptions(s):	Data Not Available
Case Number:	CPC-1987-648-ICO
Required Action(s):	ICO-INTERIM CONTROL ORDINANCE
Project Descriptions(s):	INTERIM CONTROL ORDINANCE FOR THE ENTIRE VENICE COASTAL ZONE WHICH WILL TEMPORARILY PERMIT ONLY BUILDING DEVELOPMENT WHICH IS IN CONFORMANCE WITH REGULATIONS SUBSTANTIALLY BASED ON THE CALIFORNIA COASTAL COMMISSIONS INTERPRETIVE GUIDELINES FOR THE AREA
Case Number:	CPC-1986-824-GPC
Required Action(s):	GPC-GENERAL PLAN/ZONING CONSISTENCY (AB283)
Project Descriptions(s):	
Case Number:	CPC-1984-226-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	Data Not Available
Case Number:	CPC-1972-24385
Required Action(s):	Data Not Available
Project Descriptions(s):	
Case Number:	DIR-2014-2824-DI
Required Action(s):	DI-DIRECTOR OF PLANNING INTERPRETATION
Project Descriptions(s):	DIRECTOR'S INTERPRETATION OF A SPECIFIC PLAN PURSUANT TO LAMC SECTION 11.5.7.H. THE INTERPRETATION SHALL ONLY BE APPLICABLE TO THE VENICE COASTAL SPECIFIC PLAN.
Case Number:	ZA-1992-484-PAD
Required Action(s):	PAD-PLAN APPROVAL ONLY FOR A DEEMED-TO-BE-APPROVED CU
Project Descriptions(s):	THE CITY PROPOSES TO MAINTAIN THE SITE AS A PUBLIC MUNICIPAL PARKING LOT.
Case Number:	ENV-2014-1458-EIR
Required Action(s):	EIR-ENVIRONMENTAL IMPACT REPORT
Project Descriptions(s):	ENVIRONMENTAL IMPACT REPORT
Case Number:	ENV-2005-8253-ND
Required Action(s):	ND-NEGATIVE DECLARATION
Project Descriptions(s):	AN ORDINANCE ESTABLISHING PERMANENT REGULATIONS IMPLEMENTING THE MELLO ACT IN THE COASTAL ZONE.
Case Number:	ENV-2004-2691-CE
Required Action(s):	CE-CATEGORICAL EXEMPTION
Project Descriptions(s):	SMALL LOT/TOWNHOME ORDINANCE
Case Number:	ENV-2002-6836-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	VENICE COASTAL SPECIFIC PLAN AMENDMENT prepared and adopted by the City Planning Dept. in accordance with the Coastal Act provisions and guidelines.
Case Number:	ENV-2001-846-ND
Required Action(s):	ND-NEGATIVE DECLARATION
Project Descriptions(s):	
Case Number:	ED-73-307-ZC

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(*) - APN Area is provided "as is" from the Los Angeles County's Public Works, Flood Control, Benefit Assessment.

Required Action(s): ZC-ZONE CHANGE

Project Descriptions(s): Data Not Available

DATA NOT AVAILABLE

CPC-17630

ORD-175694

ORD-175693

ORD-172897

ORD-172019

ORD-170998-SA10

ORD-168999

ORD-164844-SA2190

ORD-145252

ORD-130336

AFF-36536



0.02 Miles
80 Feet

Address: 125 E VENICE BLVD

Tract: SHORT LINE BEACH
SUBDIVISION NO. 1

Zoning: OS-1XL-O

APN: 4238024900

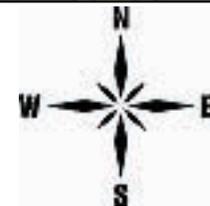
Block: 9

General Plan: Open Space

PIN #: 106-5A145 436

Lot: 36

Arb: 1



LEGEND

GENERALIZED ZONING

-  OS, GW
-  A, RA
-  RE, RS, R1, RU, RZ, RW1
-  R2, RD, RMP, RW2, R3, RAS, R4, R5
-  CR, C1, C1.5, C2, C4, C5, CW, ADP, LASED, CEC, USC, PVSP, PPSP
-  CM, MR, WC, CCS, UV, UI, UC, M1, M2, LAX, M3, SL
-  P, PB
-  PF

GENERAL PLAN LAND USE

LAND USE

RESIDENTIAL

-  Minimum Residential
-  Very Low / Very Low I Residential
-  Very Low II Residential
-  Low / Low I Residential
-  Low II Residential
-  Low Medium / Low Medium I Residential
-  Low Medium II Residential
-  Medium Residential
-  High Medium Residential
-  High Density Residential
-  Very High Medium Residential

COMMERCIAL

-  Limited Commercial
-  Limited Commercial - Mixed Medium Residential
-  Highway Oriented Commercial
-  Highway Oriented and Limited Commercial
-  Highway Oriented Commercial - Mixed Medium Residential
-  Neighborhood Office Commercial
-  Community Commercial
-  Community Commercial - Mixed High Residential
-  Regional Center Commercial

FRAMEWORK

COMMERCIAL

-  Neighborhood Commercial
-  General Commercial
-  Community Commercial
-  Regional Mixed Commercial

INDUSTRIAL

-  Commercial Manufacturing
-  Limited Manufacturing
-  Light Manufacturing
-  Heavy Manufacturing
-  Hybrid Industrial

PARKING

-  Parking Buffer

PORT OF LOS ANGELES

-  General / Bulk Cargo - Non Hazardous (Industrial / Commercial)
-  General / Bulk Cargo - Hazard
-  Commercial Fishing
-  Recreation and Commercial
-  Intermodal Container Transfer Facility Site

LOS ANGELES INTERNATIONAL AIRPORT

-  Airport Landside / Airport Landside Support
-  Airport Airside
-  LAX Airport Northside

OPEN SPACE / PUBLIC FACILITIES

-  Open Space
-  Public / Open Space
-  Public / Quasi-Public Open Space
-  Other Public Open Space
-  Public Facilities

INDUSTRIAL

-  Limited Industrial
-  Light Industrial

CIRCULATION

STREET

-  Arterial Mountain Road
-  Collector Scenic Street
-  Collector Street
-  Collector Street (Hillside)
-  Collector Street (Modified)
-  Collector Street (Proposed)
-  Country Road
-  Divided Major Highway II
-  Divided Secondary Scenic Highway
-  Local Scenic Road
-  Local Street
-  Major Highway (Modified)
-  Major Highway I
-  Major Highway II
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-  Major Scenic Highway II
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-  Scenic Park
-  Scenic Parkway
-  Secondary Highway
-  Secondary Highway (Modified)
-  Secondary Scenic Highway
-  Special Collector Street
-  Super Major Highway

FREEWAYS

-  Freeway
-  Interchange
-  On-Ramp / Off- Ramp
-  Railroad
-  Scenic Freeway Highway

MISC. LINES

-  Airport Boundary
-  Bus Line
-  Coastal Zone Boundary
-  Coastline Boundary
-  Collector Scenic Street (Proposed)
-  Commercial Areas
-  Commercial Center
-  Community Redevelopment Project Area
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-  Scenic Highway (Obsolete)
-  Secondary Scenic Controls
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-  Site Boundary
-  Southern California Edison Power
-  Special Study Area
-  Specific Plan Area
-  Stagecoach Line
-  Wildlife Corridor

POINTS OF INTEREST

 Alternative Youth Hostel (Proposed)	 Horticultural Center	 Public Elementary School
 Animal Shelter	 Hospital	 Public Elementary School (Proposed)
 Area Library	 Hospital (Proposed)	 Public Golf Course
 Area Library (Proposed)	 HW House of Worship	 Public Golf Course (Proposed)
 Bridge	 e Important Ecological Area	 Public Housing
 Campground	 e Important Ecological Area (Proposed)	 Public Housing (Proposed Expansion)
 Campground (Proposed)	 Interpretive Center (Proposed)	 JH Public Junior High School
 Cemetery	 JC Junior College	 JH Public Junior High School (Proposed)
 HW Church	 M MTA / Metrolink Station	 MS Public Middle School
 City Hall	 M MTA Station	 SH Public Senior High School
 CC Community Center	 ● MTA Stop	 SH Public Senior High School (Proposed)
 CL Community Library	 MWD MWD Headquarters	 PS Pumping Station
 CL Community Library (Proposed Expansion)	 MY Maintenance Yard	 PS Pumping Station (Proposed)
 CL Community Library (Proposed)	 MOB Municipal Office Building	 RCC Refuse Collection Center
 CP Community Park	 P Municipal Parking lot	 RL Regional Library
 CP Community Park (Proposed Expansion)	 NP Neighborhood Park	 RL Regional Library (Proposed Expansion)
 CP Community Park (Proposed)	 NP Neighborhood Park (Proposed Expansion)	 RL Regional Library (Proposed)
 CTC Community Transit Center	 NP Neighborhood Park (Proposed)	 RP Regional Park
 CH Convalescent Hospital	 OCC Oil Collection Center	 RP Regional Park (Proposed)
 CF Correctional Facility	 PE Parking Enforcement	 RPD Residential Plan Development
 CHS Cultural / Historic Site (Proposed)	 HQ Police Headquarters	 SVS Scenic View Site
 CHS Cultural / Historical Site	 PS Police Station	 SVS Scenic View Site (Proposed)
 CAC Cultural Arts Center	 PS Police Station (Proposed Expansion)	 ADM School District Headquarters
 DMV DMV Office	 PS Police Station (Proposed)	 SC School Unspecified Loc/Type (Proposed)
 DWP DWP	 PTS Police Training site	 SC Skill Center
 DWP PS DWP Pumping Station	 PO Post Office	 SS Social Services
 EC Equestrian Center	 PDS Power Distribution Station	 SF Special Feature
 FDH Fire Department Headquarters	 PDS Power Distribution Station (Proposed)	 SR Special Recreation (a)
 FS Fire Station	 PRS Power Receiving Station	 SSF Special School Facility
 FS Fire Station (Proposed Expansion)	 PRS Power Receiving Station (Proposed)	 SSF Special School Facility (Proposed)
 FS Fire Station (Proposed)	 C Private College	 SP Steam Plant
 FSM Fire Supply & Maintenance	 E Private Elementary School	 sm Surface Mining
 FTS Fire Training Site	 PG Private Golf Course	 TA Trail & Assembly Area
 FBS Fireboat Station	 PG Private Golf Course (Proposed)	 TA Trail & Assembly Area (Proposed)
 HCF Health Center / Medical Facility	 JH Private Junior High School	 UTL Utility Yard
 HLI Helistop	 PS Private Pre-School	 WTR Water Tank Reservoir
 HM Historic Monument	 PRCF Private Recreation & Cultural Facility	 WMC Wildlife Migration Corridor
 HCM Historical / Cultural Monument	 SH Private Senior High School	 WPG Wildlife Preserve Gate
 HKA Horsekeeping Area	 SF Private Special School	
 HKA Horsekeeping Area (Proposed)	 E Public Elementary (Proposed Expansion)	

SCHOOLS/PARKS WITH 500 FT. BUFFER

-  Existing School/Park Site
-  Planned School/Park Site
-  Inside 500 Ft. Buffer

- | | | |
|---|--|--|
|  Aquatic Facilities |  Other Facilities |  Opportunity School |
|  Beaches |  Park / Recreation Centers |  Charter School |
|  Child Care Centers |  Parks |  Elementary School |
|  Golf Course |  Performing / Visual Arts Centers |  Span School |
|  Historic Sites |  Recreation Centers |  Special Education School |
|  Horticulture/Gardens |  Senior Citizen Centers |  High School |
|  Skate Parks | |  Middle School |

TRANSIT ORIENTED COMMUNITIES (TOC)

- | | |
|--|--|
|  Tier 1 |  Tier 3 |
|  Tier 2 |  Tier 4 |

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COASTAL ZONE

-  Coastal Zone Commission Authority
-  Calvo Exclusion Area
-  Not in Coastal Zone
-  Dual Jurisdictional Coastal Zone

WAIVER OF DEDICATION OR IMPROVEMENT

-  Waiver of Dedication or Improvement (WDI)
-  Public Work Approval (PWA)

LAMC SECTION 85.02 (VEHICLE DWELLING)

-  No vehicle dwelling anytime
-  No vehicle dwelling overnight between 9:00 PM - 6:00 AM. Must comply with all posted parking restrictions
-  Vehicle dwelling allowed. Must comply with all posted parking restrictions

OTHER SYMBOLS

- | | | |
|---|---|--|
|  Lot Line |  Airport Hazard Zone |  Flood Zone |
|  Tract Line |  Census Tract |  Hazardous Waste |
|  Lot Cut |  Coastal Zone |  High Wind Zone |
|  Easement |  Council District |  Hillside Grading |
|  Zone Boundary |  LADBS District Office |  Historic Preservation Overlay Zone |
|  Building Line |  Downtown Parking |  Specific Plan Area |
|  Lot Split |  Fault Zone |  Very High Fire Hazard Severity Zone |
|  Community Driveway |  Fire District No. 1 |  Oil Wells |
|  Lot Ties |  Tract Map | |
|  Building Outlines 2014 |  Parcel Map | |
|  Building Outlines 2008 | | |



City of Los Angeles Department of City Planning

12/18/2017 PARCEL PROFILE REPORT

PROPERTY ADDRESSES

200 E VENICE BLVD
200 E SOUTH VENICE BLVD

ZIP CODES

90291

RECENT ACTIVITY

DIR-2008-4703-DI
ENV-2008-1044

CASE NUMBERS

CPC-2014-1456-SP
CPC-2005-8252-CA
CPC-2000-4046-CA
CPC-1998-119
CPC-1987-648-ICO
CPC-1986-824-GPC
CPC-1984-226-SP
CPC-17630
ORD-175694
ORD-175693
ORD-172897
ORD-172019
ORD-168999
ORD-164844-SA3070
ORD-130336
DIR-2014-2824-DI
ZA-2008-1045-ZAA
ZA-1984-628-SM
ENV-2014-1458-EIR
ENV-2008-1044-CE
ENV-2005-8253-ND
ENV-2004-2691-CE
ENV-2002-6836-SP
ENV-2001-846-ND

Address/Legal Information

PIN Number	106-5A145 440
Lot/Parcel Area (Calculated)	2,991.8 (sq ft)
Thomas Brothers Grid	PAGE 671 - GRID H6
Assessor Parcel No. (APN)	4227003001
Tract	SHORT LINE BEACH SUBDIVISION NO. 1
Map Reference	M B 2-59
Block	13
Lot	1
Arb (Lot Cut Reference)	None
Map Sheet	106-5A145

Jurisdictional Information

Community Plan Area	Venice
Area Planning Commission	West Los Angeles
Neighborhood Council	Venice
Council District	CD 11 - Mike Bonin
Census Tract #	2739.02
LADBS District Office	West Los Angeles

Planning and Zoning Information

Special Notes	None
Zoning	R3-1-O
	ZI-2406 Director's Interpretation of the Venice SP for Small Lot Subdivisio
	ZI-2471 Coastal Zone
	ZI-2452 Transit Priority Area in the City of Los Angeles
General Plan Land Use	Medium Residential
General Plan Note(s)	Yes
Hillside Area (Zoning Code)	No
Specific Plan Area	Los Angeles Coastal Transportation Corridor
Subarea	None
Specific Plan Area	Venice Coastal Zone
Subarea	Venice Canals
Special Land Use / Zoning	None
Design Review Board	No
Historic Preservation Review	No
Historic Preservation Overlay Zone	None
Other Historic Designations	None
Other Historic Survey Information	None
Mills Act Contract	None
CDO: Community Design Overlay	None
CPIO: Community Plan Imp. Overlay	None
Subarea	None
CUGU: Clean Up-Green Up	None
NSO: Neighborhood Stabilization Overlay	No
POD: Pedestrian Oriented Districts	None
SN: Sign District	No
Streetscape	No
Adaptive Reuse Incentive Area	None

Rent Stabilization Ordinance (RSO)	No
Transit Oriented Communities (TOC)	Tier 1
CRA - Community Redevelopment Agency	None
Central City Parking	No
Downtown Parking	No
Building Line	None
500 Ft School Zone	No
500 Ft Park Zone	No

Assessor Information

Assessor Parcel No. (APN)	4227003001
APN Area (Co. Public Works)*	0.069 (ac)
Use Code	0101 - Residential - Single Family Residence - Pool
Assessed Land Val.	\$2,246,847
Assessed Improvement Val.	\$1,758,692
Last Owner Change	10/13/2015
Last Sale Amount	\$3,850,038
Tax Rate Area	67
Deed Ref No. (City Clerk)	996965
	996964
	67795
	409258
	2404751
	2404750
	1341496
	1289208
	1258991
Building 1	
Year Built	1987
Building Class	D10A
Number of Units	1
Number of Bedrooms	2
Number of Bathrooms	3
Building Square Footage	3,735.0 (sq ft)
Building 2	No data for building 2
Building 3	No data for building 3
Building 4	No data for building 4
Building 5	No data for building 5

Additional Information

Airport Hazard	None
Coastal Zone	Coastal Zone Commission Authority
	Dual Jurisdictional Coastal Zone
Farmland	Area Not Mapped
Urban Agriculture Incentive Zone	YES
Very High Fire Hazard Severity Zone	No
Fire District No. 1	No
Flood Zone	None
Watercourse	No
Hazardous Waste / Border Zone Properties	No
Methane Hazard Site	Methane Zone
High Wind Velocity Areas	No
Special Grading Area (BOE Basic Grid Map A-13372)	No
Oil Wells	None

Seismic Hazards

Nearest Fault (Distance in km)	5.58546
Nearest Fault (Name)	Santa Monica Fault
Region	Transverse Ranges and Los Angeles Basin
Fault Type	B
Slip Rate (mm/year)	1.00000000
Slip Geometry	Left Lateral - Reverse - Oblique
Slip Type	Moderately / Poorly Constrained
Down Dip Width (km)	13.00000000
Rupture Top	0.00000000
Rupture Bottom	13.00000000
Dip Angle (degrees)	-75.00000000
Maximum Magnitude	6.60000000
Alquist-Priolo Fault Zone	No
Landslide	No
Liquefaction	Yes
Preliminary Fault Rupture Study Area	No
Tsunami Inundation Zone	Yes

Economic Development Areas

Business Improvement District	None
Promise Zone	None
Renewal Community	No
Revitalization Zone	None
State Enterprise Zone	None
Targeted Neighborhood Initiative	None

Public Safety

Police Information

Bureau	West
Division / Station	Pacific
Reporting District	1441

Fire Information

Bureau	West
Batallion	4
District / Fire Station	63
Red Flag Restricted Parking	No

Note: Information for case summaries is retrieved from the Planning Department's Plan Case Tracking System (PCTS) database.

Case Number:	CPC-2014-1456-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	SPECIFIC PLAN AMENDMENT
Case Number:	CPC-2005-8252-CA
Required Action(s):	CA-CODE AMENDMENT
Project Descriptions(s):	AN ORDINANCE ESTABLISHING PERMANENT REGULATIONS IMPLEMENTING THE MELLO ACT IN THE COASTAL ZONE.
Case Number:	CPC-2000-4046-CA
Required Action(s):	CA-CODE AMENDMENT
Project Descriptions(s):	
Case Number:	CPC-1998-119
Required Action(s):	Data Not Available
Project Descriptions(s):	
Case Number:	CPC-1987-648-ICO
Required Action(s):	ICO-INTERIM CONTROL ORDINANCE
Project Descriptions(s):	INTERIM CONTROL ORDINANCE FOR THE ENTIRE VENICE COASTAL ZONE WHICH WILL TEMPORARILY PERMIT ONLY BUILDING DEVELOPMENT WHICH IS IN CONFORMANCE WITH REGULATIONS SUBSTANTIALLY BASED ON THE CALIFORNIA COASTAL COMMISSIONS INTERPRETIVE GUIDELINES FOR THE AREA
Case Number:	CPC-1986-824-GPC
Required Action(s):	GPC-GENERAL PLAN/ZONING CONSISTENCY (AB283)
Project Descriptions(s):	
Case Number:	CPC-1984-226-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	Data Not Available
Case Number:	DIR-2014-2824-DI
Required Action(s):	DI-DIRECTOR OF PLANNING INTERPRETATION
Project Descriptions(s):	DIRECTOR'S INTERPRETATION OF A SPECIFIC PLAN PURSUANT TO LAMC SECTION 11.5.7.H. THE INTERPRETATION SHALL ONLY BE APPLICABLE TO THE VENICE COASTAL SPECIFIC PLAN.
Case Number:	ZA-2008-1045-ZAA
Required Action(s):	ZAA-AREA, HEIGHT, YARD, AND BLDG LINE ADJMNTS GT 20% (SLIGHT MODIFICATIONS)
Project Descriptions(s):	AS PER 12.28 - ZONING ADMINISTRATOR'S ADJUSTMENT TO PERMIT A REDUCED FRONT YARD SETBACK OF 5' IN LIEU OF THE MINIMUM 15' REQUIRED (PER SECTION 12.10 C.1).
Case Number:	ZA-1984-628-SM
Required Action(s):	SM-SLIGHT MODIFICATIONS
Project Descriptions(s):	
Case Number:	ENV-2014-1458-EIR
Required Action(s):	EIR-ENVIRONMENTAL IMPACT REPORT
Project Descriptions(s):	ENVIRONMENTAL IMPACT REPORT
Case Number:	ENV-2008-1044-CE
Required Action(s):	CE-CATEGORICAL EXEMPTION
Project Descriptions(s):	AS PER 12.28 - ZONING ADMINISTRATOR'S ADJUSTMENT TO PERMIT A REDUCED FRONT YARD SETBACK OF 5' IN LIEU OF THE MINIMUM 15' REQUIRED (PER SECTION 12.10 C.1).
Case Number:	ENV-2005-8253-ND
Required Action(s):	ND-NEGATIVE DECLARATION
Project Descriptions(s):	AN ORDINANCE ESTABLISHING PERMANENT REGULATIONS IMPLEMENTING THE MELLO ACT IN THE COASTAL ZONE.
Case Number:	ENV-2004-2691-CE
Required Action(s):	CE-CATEGORICAL EXEMPTION
Project Descriptions(s):	SMALL LOT/TOWNHOME ORDINANCE
Case Number:	ENV-2002-6836-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	VENICE COASTAL SPECIFIC PLAN AMENDMENT prepared and adopted by the City Planning Dept. in accordance with the Coastal Act provisions and guidelines.
Case Number:	ENV-2001-846-ND
Required Action(s):	ND-NEGATIVE DECLARATION
Project Descriptions(s):	

DATA NOT AVAILABLE

CPC-17630

ORD-175694

ORD-175693

ORD-172897

ORD-172019

ORD-168999

ORD-164844-SA3070

ORD-130336

12/18/2017

Generalized Zoning

IMAS PUBLIC



Zoning: R3-1-O
General Plan: Medium Residential

Tract: SHORT LINE BEACH
SUBDIVISION NO. 1
Block: 13
Lot: 1
Arb: None

Address: 200 E VENICE BLVD
APN: 4227003001
N #: 106-5A145 440

LEGEND

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- | | | |
|---|--|--|
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- | | |
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|  Zone Boundary |  LADBS District Office |  Historic Preservation Overlay Zone |
|  Building Line |  Downtown Parking |  Specific Plan Area |
|  Lot Split |  Fault Zone |  Very High Fire Hazard Severity Zone |
|  Community Driveway |  Fire District No. 1 |  Oil Wells |
|  Lot Ties |  Tract Map | |
|  Building Outlines 2014 |  Parcel Map | |
|  Building Outlines 2008 | | |



City of Los Angeles Department of City Planning

12/18/2017 PARCEL PROFILE REPORT

PROPERTY ADDRESSES

3233 S THATCHER AVE
3311 S THATCHER AVE
3321 S THATCHER AVE

ZIP CODES

90292

RECENT ACTIVITY

DIR-2008-4703-DI

CASE NUMBERS

CPC-2014-1456-SP
CPC-2005-8252-CA
CPC-2000-4046-CA
CPC-1998-119
CPC-1995-148-GPC-ZC
CPC-1987-648-ICO
CPC-1984-226-SP
CPC-1963-14311
CPC-1949-2836
ORD-175694
ORD-175693
ORD-172897
ORD-172019
ORD-170999-SA60
ORD-170155
ORD-168999
ORD-162509
DIR-2014-2824-DI
ENV-2014-1458-EIR
ENV-2005-8253-ND
ENV-2004-2691-CE
ENV-2002-6836-SP
ENV-2001-846-ND
AFF-4831
CDP-1983-19

Address/Legal Information

PIN Number	105B149 535
Lot/Parcel Area (Calculated)	93,274.7 (sq ft)
Thomas Brothers Grid	PAGE 672 - GRID A6
Assessor Parcel No. (APN)	4229002901
Tract	RAFAEL AND ANDRES MACHADO TRACT
Map Reference	M R 84-33/34
Block	None
Lot	PT "UNNUMBERED LT"
Arb (Lot Cut Reference)	261
Map Sheet	105B149

Jurisdictional Information

Community Plan Area	Venice
Area Planning Commission	West Los Angeles
Neighborhood Council	Venice
Council District	CD 11 - Mike Bonin
Census Tract #	2741.00
LADBS District Office	West Los Angeles

Planning and Zoning Information

Special Notes	None
Zoning	[Q]PF-1XL
	ZI-2406 Director's Interpretation of the Venice SP for Small Lot Subdivisio
	ZI-2471 Coastal Zone
	ZI-2452 Transit Priority Area in the City of Los Angeles
General Plan Land Use	Public Facilities
General Plan Note(s)	Yes
Hillside Area (Zoning Code)	No
Specific Plan Area	Los Angeles Coastal Transportation Corridor
Subarea	None
Specific Plan Area	Oxford Triangle
Subarea	None
Specific Plan Area	Venice Coastal Zone
Subarea	Oxford Triangle
Special Land Use / Zoning	None
Design Review Board	No
Historic Preservation Review	No
Historic Preservation Overlay Zone	None
Other Historic Designations	None
Other Historic Survey Information	None
Mills Act Contract	None
CDO: Community Design Overlay	None
CPIO: Community Plan Imp. Overlay	None
Subarea	None
CUGU: Clean Up-Green Up	None
NSO: Neighborhood Stabilization Overlay	No
POD: Pedestrian Oriented Districts	None
SN: Sign District	No

Adaptive Reuse Incentive Area	None
Ellis Act Property	No
Rent Stabilization Ordinance (RSO)	No
Transit Oriented Communities (TOC)	Not Eligible
CRA - Community Redevelopment Agency	None
Central City Parking	No
Downtown Parking	No
Building Line	None
500 Ft School Zone	No
500 Ft Park Zone	No

Assessor Information

Assessor Parcel No. (APN)	4229002901
APN Area (Co. Public Works)*	2.110 (ac)
Use Code	8800 - Miscellaneous - Government Owned Property
Assessed Land Val.	\$176,888
Assessed Improvement Val.	\$0
Last Owner Change	00/00/1964
Last Sale Amount	\$0
Tax Rate Area	67
Deed Ref No. (City Clerk)	None
Building 1	No data for building 1
Building 2	No data for building 2
Building 3	No data for building 3
Building 4	No data for building 4
Building 5	No data for building 5

Additional Information

Airport Hazard	None
Coastal Zone	Calvo Exclusion Area Coastal Zone Commission Authority
Farmland	Area Not Mapped
Urban Agriculture Incentive Zone	YES
Very High Fire Hazard Severity Zone	No
Fire District No. 1	No
Flood Zone	None
Watercourse	No
Hazardous Waste / Border Zone Properties	No
Methane Hazard Site	Methane Zone
High Wind Velocity Areas	No
Special Grading Area (BOE Basic Grid Map A-13372)	No
Oil Wells	None

Seismic Hazards

Active Fault Near-Source Zone	
Nearest Fault (Distance in km)	6.2252352
Nearest Fault (Name)	Santa Monica Fault
Region	Transverse Ranges and Los Angeles Basin
Fault Type	B
Slip Rate (mm/year)	1.00000000
Slip Geometry	Left Lateral - Reverse - Oblique
Slip Type	Moderately / Poorly Constrained
Down Dip Width (km)	13.00000000
Rupture Top	0.00000000
Rupture Bottom	13.00000000
Dip Angle (degrees)	-75.00000000

Alquist-Priolo Fault Zone	No
Landslide	No
Liquefaction	Yes
Preliminary Fault Rupture Study Area	No
Tsunami Inundation Zone	Yes

Economic Development Areas

Business Improvement District	None
Promise Zone	None
Renewal Community	No
Revitalization Zone	None
State Enterprise Zone	None
Targeted Neighborhood Initiative	None

Public Safety

Police Information

Bureau	West
Division / Station	Pacific
Reporting District	1444

Fire Information

Bureau	West
Batallion	4
District / Fire Station	63
Red Flag Restricted Parking	No

Note: Information for case summaries is retrieved from the Planning Department's Plan Case Tracking System (PCTS) database.

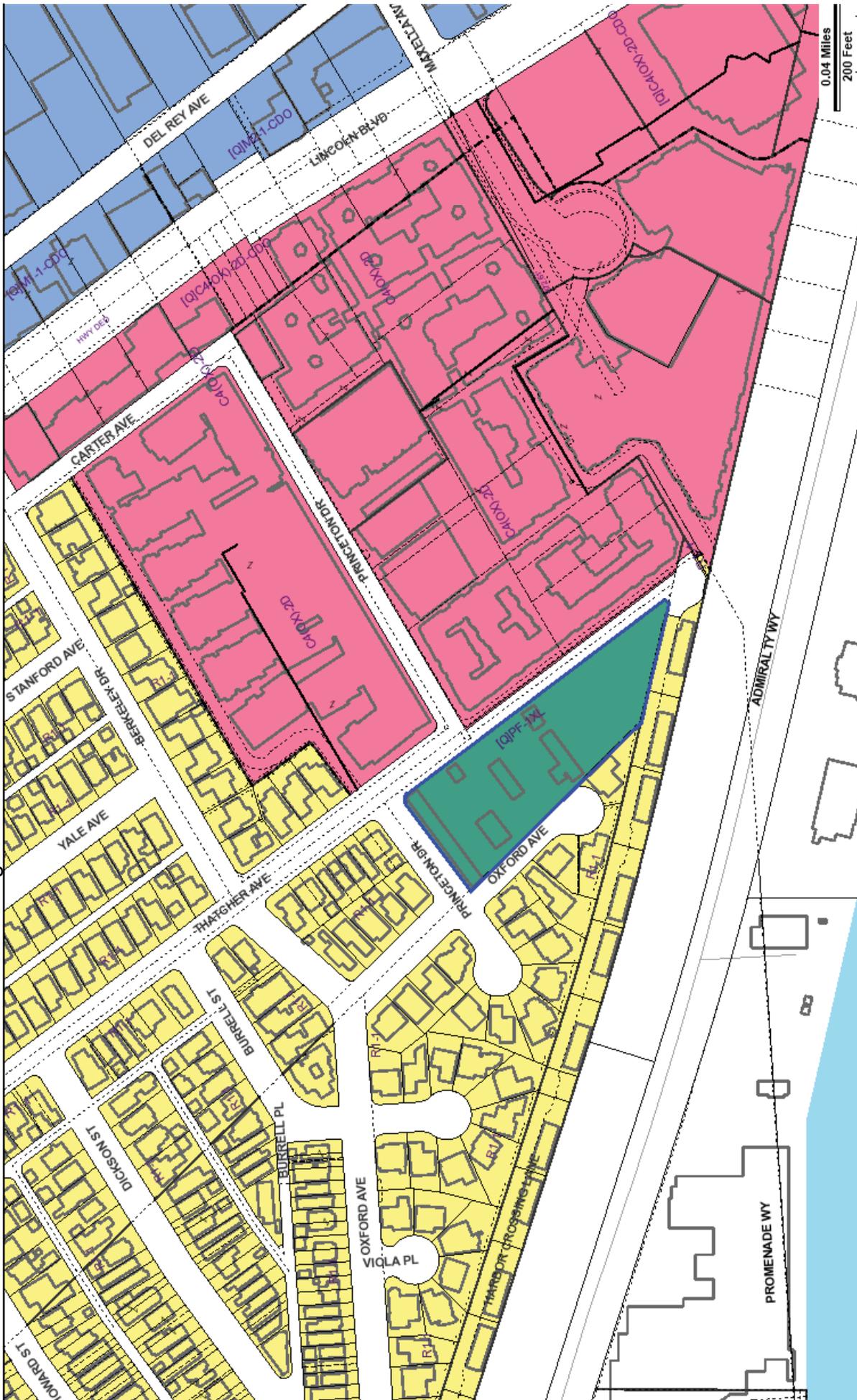
Case Number:	CPC-2014-1456-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	SPECIFIC PLAN AMENDMENT
Case Number:	CPC-2005-8252-CA
Required Action(s):	CA-CODE AMENDMENT
Project Descriptions(s):	AN ORDINANCE ESTABLISHING PERMANENT REGULATIONS IMPLEMENTING THE MELLO ACT IN THE COASTAL ZONE.
Case Number:	CPC-2000-4046-CA
Required Action(s):	CA-CODE AMENDMENT
Project Descriptions(s):	
Case Number:	CPC-1998-119
Required Action(s):	Data Not Available
Project Descriptions(s):	
Case Number:	CPC-1995-148-GPC-ZC
Required Action(s):	GPC-GENERAL PLAN/ZONING CONSISTENCY (AB283) ZC-ZONE CHANGE
Project Descriptions(s):	Data Not Available
Case Number:	CPC-1987-648-ICO
Required Action(s):	ICO-INTERIM CONTROL ORDINANCE
Project Descriptions(s):	INTERIM CONTROL ORDINANCE FOR THE ENTIRE VENICE COASTAL ZONE WHICH WILL TEMPORARILY PERMIT ONLY BUILDING DEVELOPMENT WHICH IS IN CONFORMANCE WITH REGULATIONS SUBSTANTIALLY BASED ON THE CALIFORNIA COASTAL COMMISSIONS INTERPRETIVE GUIDELINES FOR THE AREA
Case Number:	CPC-1984-226-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	Data Not Available
Case Number:	CPC-1963-14311
Required Action(s):	Data Not Available
Project Descriptions(s):	
Case Number:	CPC-1949-2836
Required Action(s):	Data Not Available
Project Descriptions(s):	
Case Number:	DIR-2014-2824-DI
Required Action(s):	DI-DIRECTOR OF PLANNING INTERPRETATION
Project Descriptions(s):	DIRECTOR'S INTERPRETATION OF A SPECIFIC PLAN PURSUANT TO LAMC SECTION 11.5.7.H. THE INTERPRETATION SHALL ONLY BE APPLICABLE TO THE VENICE COASTAL SPECIFIC PLAN.
Case Number:	ENV-2014-1458-EIR
Required Action(s):	EIR-ENVIRONMENTAL IMPACT REPORT
Project Descriptions(s):	ENVIRONMENTAL IMPACT REPORT
Case Number:	ENV-2005-8253-ND
Required Action(s):	ND-NEGATIVE DECLARATION
Project Descriptions(s):	AN ORDINANCE ESTABLISHING PERMANENT REGULATIONS IMPLEMENTING THE MELLO ACT IN THE COASTAL ZONE.
Case Number:	ENV-2004-2691-CE
Required Action(s):	CE-CATEGORICAL EXEMPTION
Project Descriptions(s):	SMALL LOT/TOWNHOME ORDINANCE
Case Number:	ENV-2002-6836-SP
Required Action(s):	SP-SPECIFIC PLAN (INCLUDING AMENDMENTS)
Project Descriptions(s):	VENICE COASTAL SPECIFIC PLAN AMENDMENT prepared and adopted by the City Planning Dept. in accordance with the Coastal Act provisions and guidelines.
Case Number:	ENV-2001-846-ND
Required Action(s):	ND-NEGATIVE DECLARATION
Project Descriptions(s):	
Case Number:	CDP-1983-19
Required Action(s):	Data Not Available
Project Descriptions(s):	

ORD-175694
ORD-175693
ORD-172897
ORD-172019
ORD-170999-SA60
ORD-170155
ORD-168999
ORD-162509
AFF-4831

12/18/2017

Generalized Zoning

IMAS PUBLIC



Zoning: [QJPF-1XL]
General Plan: Public Facilities

Tract: RAFAEL AND ANDRES
MACHADO TRACT
Block: None
Lot: PT "UNNUMBERED LT"
Arb: 261

Address: 3233 S THATCHER AVE
APN: 4229002901
N #: 105B149 535

LEGEND

GENERALIZED ZONING

- OS, GW
- A, RA
- RE, RS, R1, RU, RZ, RW1
- R2, RD, RMP, RW2, R3, RAS, R4, R5
- CR, C1, C1.5, C2, C4, C5, CW, ADP, LASED, CEC, USC, PVSP, PPSP
- CM, MR, WC, CCS, UV, UI, UC, M1, M2, LAX, M3, SL
- P, PB
- PF

GENERAL PLAN LAND USE

LAND USE

RESIDENTIAL

- Minimum Residential
- Very Low / Very Low I Residential
- Very Low II Residential
- Low / Low I Residential
- Low II Residential
- Low Medium / Low Medium I Residential
- Low Medium II Residential
- Medium Residential
- High Medium Residential
- High Density Residential
- Very High Medium Residential

COMMERCIAL

- Limited Commercial
- Limited Commercial - Mixed Medium Residential
- Highway Oriented Commercial
- Highway Oriented and Limited Commercial
- Highway Oriented Commercial - Mixed Medium Residential
- Neighborhood Office Commercial
- Community Commercial
- Community Commercial - Mixed High Residential
- Regional Center Commercial

FRAMEWORK

COMMERCIAL

- Neighborhood Commercial
- General Commercial
- Community Commercial
- Regional Mixed Commercial

INDUSTRIAL

- Commercial Manufacturing
- Limited Manufacturing
- Light Manufacturing
- Heavy Manufacturing
- Hybrid Industrial

PARKING

- Parking Buffer

PORT OF LOS ANGELES

- General / Bulk Cargo - Non Hazardous (Industrial / Commercial)
- General / Bulk Cargo - Hazard
- Commercial Fishing
- Recreation and Commercial
- Intermodal Container Transfer Facility Site

LOS ANGELES INTERNATIONAL AIRPORT

- Airport Landside / Airport Landside Support
- Airport Airside
- LAX Airport Northside

OPEN SPACE / PUBLIC FACILITIES

- Open Space
- Public / Open Space
- Public / Quasi-Public Open Space
- Other Public Open Space
- Public Facilities

INDUSTRIAL

- Limited Industrial
- Light Industrial

CIRCULATION

STREET

-  Arterial Mountain Road
-  Collector Scenic Street
-  Collector Street
-  Collector Street (Hillside)
-  Collector Street (Modified)
-  Collector Street (Proposed)
-  Country Road
-  Divided Major Highway II
-  Divided Secondary Scenic Highway
-  Local Scenic Road
-  Local Street
-  Major Highway (Modified)
-  Major Highway I
-  Major Highway II
-  Major Highway II (Modified)

-  Major Scenic Highway
-  Major Scenic Highway (Modified)
-  Major Scenic Highway II
-  Mountain Collector Street
-  Park Road
-  Parkway
-  Principal Major Highway
-  Private Street
-  Scenic Divided Major Highway II
-  Scenic Park
-  Scenic Parkway
-  Secondary Highway
-  Secondary Highway (Modified)
-  Secondary Scenic Highway
-  Special Collector Street
-  Super Major Highway

FREEWAYS

-  Freeway
-  Interchange
-  On-Ramp / Off- Ramp
-  Railroad
-  Scenic Freeway Highway

MISC. LINES

-  Airport Boundary
-  Bus Line
-  Coastal Zone Boundary
-  Coastline Boundary
-  Collector Scenic Street (Proposed)
-  Commercial Areas
-  Commercial Center
-  Community Redevelopment Project Area
-  Country Road
-  DWP Power Lines
-  Desirable Open Space
-  Detached Single Family House
-  Endangered Ridgeline
-  Equestrian and/or Hiking Trail
-  Hiking Trail
-  Historical Preservation
-  Horsekeeping Area
-  Local Street
-  MSA Desirable Open Space
-  Major Scenic Controls
-  Multi-Purpose Trail
-  Natural Resource Reserve
-  Park Road
-  Park Road (Proposed)
-  Quasi-Public
-  Rapid Transit Line
-  Residential Planned Development
-  Scenic Highway (Obsolete)
-  Secondary Scenic Controls
-  Secondary Scenic Highway (Proposed)
-  Site Boundary
-  Southern California Edison Power
-  Special Study Area
-  Specific Plan Area
-  Stagecoach Line
-  Wildlife Corridor

POINTS OF INTEREST

 Alternative Youth Hostel (Proposed)	 Horticultural Center	 Public Elementary School
 Animal Shelter	 Hospital	 Public Elementary School (Proposed)
 Area Library	 Hospital (Proposed)	 Public Golf Course
 Area Library (Proposed)	HW House of Worship	 Public Golf Course (Proposed)
 Bridge	 Important Ecological Area	 Public Housing
 Campground	 Important Ecological Area (Proposed)	 Public Housing (Proposed Expansion)
 Campground (Proposed)	 Interpretive Center (Proposed)	 Public Junior High School
 Cemetery	 Junior College	 Public Junior High School (Proposed)
HW Church	 MTA / Metrolink Station	 Public Middle School
 City Hall	 MTA Station	 Public Senior High School
 Community Center	 MTA Stop	 Public Senior High School (Proposed)
 Community Library	MWD MWD Headquarters	 Pumping Station
 Community Library (Proposed Expansion)	 Maintenance Yard	 Pumping Station (Proposed)
 Community Library (Proposed)	 Municipal Office Building	 Refuse Collection Center
 Community Park	 Municipal Parking lot	 Regional Library
 Community Park (Proposed Expansion)	 Neighborhood Park	 Regional Library (Proposed Expansion)
 Community Park (Proposed)	 Neighborhood Park (Proposed Expansion)	 Regional Library (Proposed)
 Community Transit Center	 Neighborhood Park (Proposed)	 Regional Park
 Convalescent Hospital	 Oil Collection Center	 Regional Park (Proposed)
 Correctional Facility	 Parking Enforcement	RPD Residential Plan Development
 Cultural / Historic Site (Proposed)	 Police Headquarters	 Scenic View Site
 Cultural / Historical Site	 Police Station	 Scenic View Site (Proposed)
 Cultural Arts Center	 Police Station (Proposed Expansion)	 School District Headquarters
DMV DMV Office	 Police Station (Proposed)	 School Unspecified Loc/Type (Proposed)
DWP DWP	 Police Training site	 Skill Center
 DWP Pumping Station	PO Post Office	SS Social Services
 Equestrian Center	 Power Distribution Station	 Special Feature
 Fire Department Headquarters	 Power Distribution Station (Proposed)	 Special Recreation (a)
 Fire Station	 Power Receiving Station	 Special School Facility
 Fire Station (Proposed Expansion)	 Power Receiving Station (Proposed)	 Special School Facility (Proposed)
 Fire Station (Proposed)	C Private College	 Steam Plant
 Fire Supply & Maintenance	E Private Elementary School	 Surface Mining
 Fire Training Site	 Private Golf Course	 Trail & Assembly Area
 Fireboat Station	 Private Golf Course (Proposed)	 Trail & Assembly Area (Proposed)
 Health Center / Medical Facility	JH Private Junior High School	UTL Utility Yard
 Helistop	PS Private Pre-School	 Water Tank Reservoir
 Historic Monument	 Private Recreation & Cultural Facility	 Wildlife Migration Corridor
 Historical / Cultural Monument	SH Private Senior High School	 Wildlife Preserve Gate
 Horsekeeping Area	SF Private Special School	
 Horsekeeping Area (Proposed)	 Public Elementary (Proposed Expansion)	

SCHOOLS/PARKS WITH 500 FT. BUFFER

-  Existing School/Park Site
-  Planned School/Park Site
-  Inside 500 Ft. Buffer

- | | | |
|---|--|--|
|  Aquatic Facilities |  Other Facilities |  Opportunity School |
|  Beaches |  Park / Recreation Centers |  Charter School |
|  Child Care Centers |  Parks |  Elementary School |
|  Golf Course |  Performing / Visual Arts Centers |  Span School |
|  Historic Sites |  Recreation Centers |  Special Education School |
|  Horticulture/Gardens |  Senior Citizen Centers |  High School |
|  Skate Parks | |  Middle School |

TRANSIT ORIENTED COMMUNITIES (TOC)

- | | |
|--|--|
|  Tier 1 |  Tier 3 |
|  Tier 2 |  Tier 4 |

Note: TOC Tier designation and map layers are for reference purposes only. Eligible projects shall demonstrate compliance with Tier eligibility standards prior to the issuance of any permits or approvals. As transit service changes, eligible TOC Incentive Areas will be updated.

COASTAL ZONE

-  Coastal Zone Commission Authority
-  Calvo Exclusion Area
-  Not in Coastal Zone
-  Dual Jurisdictional Coastal Zone

WAIVER OF DEDICATION OR IMPROVEMENT

-  Waiver of Dedication or Improvement (WDI)
-  Public Work Approval (PWA)

LAMC SECTION 85.02 (VEHICLE DWELLING)

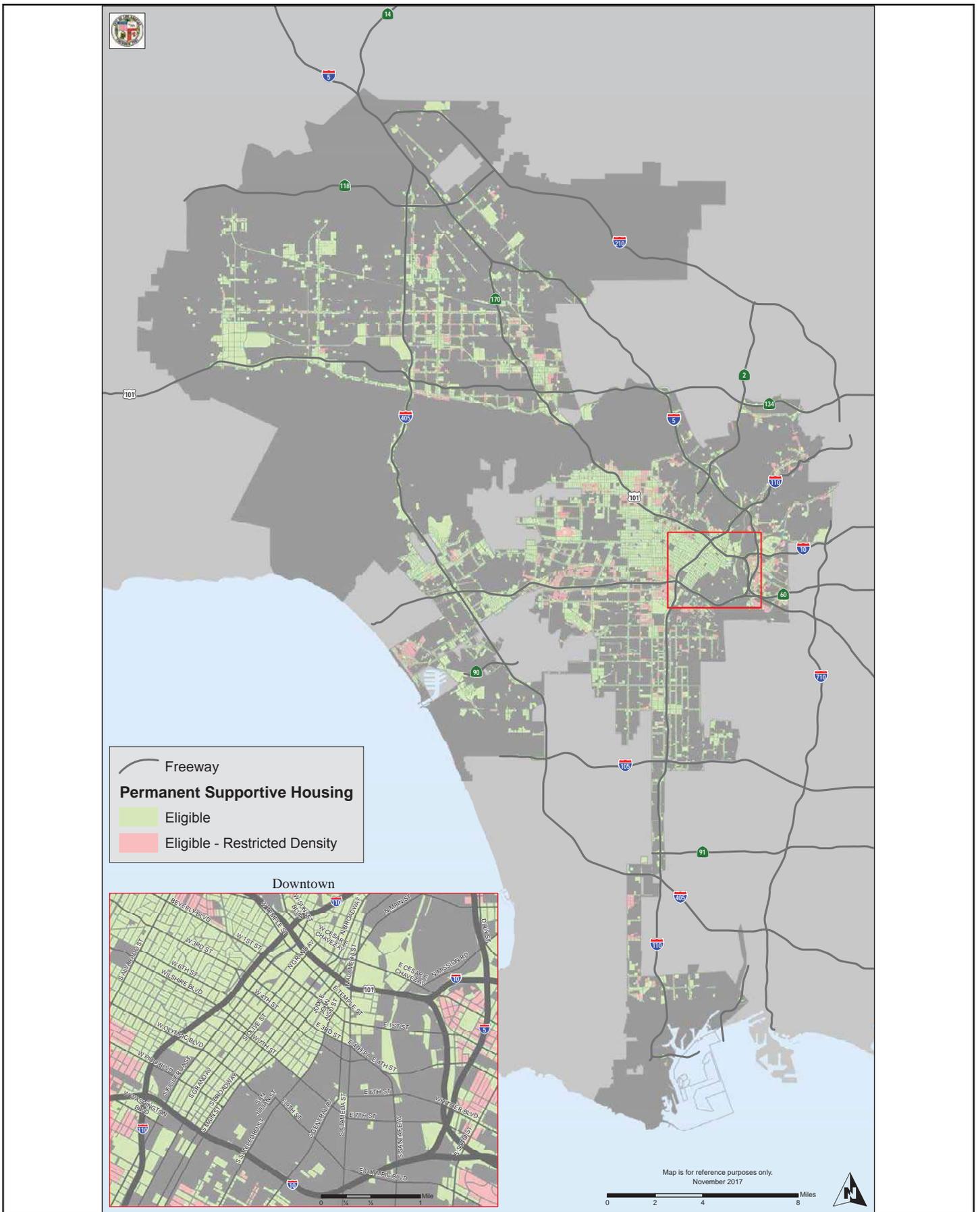
-  No vehicle dwelling anytime
-  No vehicle dwelling overnight between 9:00 PM - 6:00 AM. Must comply with all posted parking restrictions
-  Vehicle dwelling allowed. Must comply with all posted parking restrictions

OTHER SYMBOLS

- | | | |
|---|---|--|
|  Lot Line |  Airport Hazard Zone |  Flood Zone |
|  Tract Line |  Census Tract |  Hazardous Waste |
|  Lot Cut |  Coastal Zone |  High Wind Zone |
|  Easement |  Council District |  Hillside Grading |
|  Zone Boundary |  LADBS District Office |  Historic Preservation Overlay Zone |
|  Building Line |  Downtown Parking |  Specific Plan Area |
|  Lot Split |  Fault Zone |  Very High Fire Hazard Severity Zone |
|  Community Driveway |  Fire District No. 1 |  Oil Wells |
|  Lot Ties |  Tract Map | |
|  Building Outlines 2014 |  Parcel Map | |
|  Building Outlines 2008 | | |

Attachments To The
Channel Law Comments On The Environmental Documentation For, And The,
Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And
Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd
(APN 4238-024-900 To 911)
December 20, 2017

Attachment 4
Location of PSH Ordinance Eligible Parcels.



SOURCE: City of Los Angeles Department of City Planning, 2017

FIGURE 4

PSH Eligible Parcels

Attachments To The
Channel Law Comments On The Environmental Documentation For, And The,
Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And
Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd
(APN 4238-024-900 To 911)
December 20, 2017

Attachment 4
Notice of Intent to Adopt MND from City's Website



Search Classifieds for

In Category

Zip Code

Miles around

Example: "Brown Couch"

All Categories

90012

50 miles

Go

Place an Ad with the Los Angeles Times!

Browse Categories

▼ For Sale

- Antiques
- Arts & Crafts
- Auto Parts
- Baby & Kid Stuff
- Bicycles
- Boats
- Books & Magazines
- Building Supplies & Materials
- Business & Commercial
- CDs/DVDs/VHS
- Clothing & Accessories
- Collectibles
- Computers & Technology
- Electronics
- Furniture
- Games & Toys
- Health & Beauty
- Household Items
- Jewelry
- Motorcycles & Scooters
- Musical Instruments
- Outdoor & Garden
- Pets
- Powered by Gadzoo.com
- Photography & Video
- Recreational Vehicles
- Sporting Goods
- Tickets
- Tools
- Wanted to Buy
- Other

► Real Estate

► Services

► Announcements

► Events

Legal Notices: City Of

Legal Notices: CITY OF LOS ANGELES ENVIRONMENTAL NOTICES Notice is hereby given to the general public of the availability for public review and comment on the following Environmental documents. Please call Darlene Navarrete to review file: (213)978-1332. Files are available for REVIEW at: Los Angeles City Hall, 200 N. Spring St., Room 750, Los Angeles, CA 90012. Comments can be faxed to: (213)978-1343, or emailed to darlene.navarrete@lacity.org. (*unless otherwise noted). CD indicates the City Council District, sf indicates square feet and LAMC indicates Los Angeles Municipal Code. The publication is intended to serve as our Notice of Intent to adopt the following Mitigated Negative Declaration (MND) or Negative Declaration (ND) MITIGATED NEGATIVE DECLARATION-NG-17-138-PL: ENV-2017-1015. 15116-15216 S Vermont Ave & 747-761 W Redondo Beach Blvd; Harbor Gateway. CD15. The proposed project is the construction, use & maintenance of a new, 1-story (with mezzanine), 54-ft. tall, 466,402 sf warehouse/manufacturing/high-cube warehouse/distribution center with a total of 246 automobile parking spaces & 24 bicycle parking spaces. The proposed project requires Conditional Use Permits for a development which creates 250,000 sf or more of warehouse floor area & deviations from the Commercial Corner Development regulations; a Zoning Administrator's Adjustment to allow a 20% increase in the permitted building height; a Zoning Administrator's Determination to allow deviations from the Transitional Height provisions, and a Site Plan Review. REVIEW/COMMENT period ends: Jan. 2, 2018 NEGATIVE DECLARATION-NG-17-139-PL: ENV-2017-3410. Citywide zoning ordinance affecting all legally existing Hotels, Motels, Apartment Hotels, Transient Occupancy Residential Structures and Hostels located in the City of Los Angeles. CD's 1-15. The Proposed Interim Motel Conversion (IMC) Project is an ordinance (IMC Ordinance) that would amend Sections 12.03, 14.00 & 15.02 of the City of Los Angeles Municipal Code (LAMC) to establish regulations to facilitate the use of existing hotels & motels for Supportive Housing and/or Transitional Housing. The ordinance will remove regulatory barriers to allow for the temporary re-use of existing structures for residential purposes. The proposed amendment to LAMC Section 12.03 would formalize the definitions of Supportive Housing, Transitional Housing, and Supportive Services to reflect existing state law. The proposed amendments to LAMC Section 14.00 would change the approval process to allow existing residential structures such as Hotels, Motels, Apartment Hotels, Transient Occupancy Residential Structures & Hostels to conduct minor interior alterations & a temporary change of use to supportive housing and/or transitional housing. The supportive housing/transitional housing use is temporary, and is contingent upon the existence of a valid contract with a local public agency to provide that use; upon termination of any such contract, the Interim Motel Conversion Project would be required to revert to the previous legally existing use. Provisions are included in this section to ensure that the temporary change in use will not result in any increase in building footprint, the number of units, or the overall building height. The proposed amendments to LAMC Section 15.02 would amend the City's Rent Stabilization Ordinance to include an exemption for such projects, which are operating under the protection of a contract to provide the supportive housing and/or transitional housing use. REVIEW/COMMENT period ends: Dec. 20, 2017 MITIGATED NEGATIVE DECLARATION-NG-17-140-PL: ENV-2017-3137. Citywide zoning ordinance affecting all parcels in the City of Los Angeles zoned for multifamily residential use & located within High Quality Transit Areas (HQTA). Additionally, PSH development could occur on some parcels zoned Public Facilities (PF), and on some sites which are currently protected under the City's Residential Hotel Unit Conversion & Demolition Ordinance in LAMC Section 47.70 et seq. CD's 1-15. The Proposed Permanent Supportive Housing (PSH) Project is an ordinance (PSH Ordinance) that would amend the City of Los Angeles Municipal Code (LAMC) to facilitate development of PSH units. The purpose of this ordinance is to improve the process for the development of these units. The Proposed PSH Project would amend Sections 12.03, 12.04.09, 14.00 & 16.05 of the LAMC establishing regulations that define PSH & project eligibility criteria, establish unique development standards for PSH, and facilitate administrative review & approval, as well as modify certain provisions related to height & density. The Project also includes amendments to the Land Use element of the City's General Plan (consisting of 35 Community Plans) to allow PSH development to exceed any otherwise applicable minimum lot area per dwelling unit or guest room standards for the zone in which it is located. The PSH Ordinance would allow for projects to select up to 4 concessions with respect to the Zoning Code, including up to 20% decrease in required setbacks, up to 20% reduction in required open space, up to 20% increase in lot coverage limits, up to 35% increase in FAR and depending on the height district up to a 35% increase in height or one additional story. Additional design requirements include that when adjacent to or across an alley from an R2 or more restrictive zone, the building's transitional height shall be stepped-back within a 45-degree angle. REVIEW/COMMENT period ends: Dec. 20, 2017

Additional Information

Posted: 2 weeks, 5 days, 19 hours ago

Category: Public & Legal Notices

PUBLICATION OF ENVIRONMENTAL NOTICES

LOS ANGELES TIMES

THURSDAY, NOVEMBER 30, 2017

Notice is hereby given to the general public of the availability for public review and comment on the following Environmental documents. Please call Darlene Navarrete to review file: (213)978-1332. Files are available for REVIEW at: Los Angeles City Hall, 200 N. Spring St., Room 750, Los Angeles, CA 90012. Comments can be faxed to: (213)978-1343, or emailed to darlene.navarrete@lacity.org. (*unless otherwise noted). CD indicates the City Council District, sf indicates square feet and LAMC indicates Los Angeles Municipal Code. The publication is intended to serve as our Notice of Intent to adopt the following Mitigated Negative Declaration (MND) or Negative Declaration (ND)

MITIGATED NEGATIVE DECLARATION-NG-17-138-PL: [ENV-2017-1015](#). [ENV-2017-1015-A](#). [ENV-2017-1015-B](#). [ENV-2017-1015-C](#). [ENV-2017-1015-D](#). 15116-15216 S Vermont Ave & 747-761 W Redondo Beach Blvd; Harbor Gateway. CD15. The proposed project is the construction, use & maintenance of a new, 1-story (with mezzanine), 54-ft. tall, 466,402 sf warehouse/manufacturing/high-cube warehouse/distribution center with a total of 246 automobile parking spaces & 24 bicycle parking spaces. The proposed project requires Conditional Use Permits for a development which creates 250,000 sf or more of warehouse floor area & deviations from the Commercial Corner Development regulations; a Zoning Administrator's Adjustment to allow a 20% increase in the permitted building height; a Zoning Administrator's Determination to allow deviations from the Transitional Height provisions, and a Site Plan Review. REVIEW/COMMENT period ends: Jan. 2, 2018

NEGATIVE DECLARATION-NG-17-139-PL: [ENV-2017-3410](#). Citywide zoning ordinance affecting all legally existing Hotels, Motels, Apartment Hotels, Transient Occupancy Residential Structures and Hostels located in the City of Los Angeles. CD's 1-15. The Proposed Interim Motel Conversion (IMC) Project is an ordinance (IMC Ordinance) that would amend Sections 12.03, 14.00 & 151.02 of the City of Los Angeles Municipal Code (LAMC) to establish regulations to facilitate the use of existing hotels & motels for Supportive Housing and/or Transitional Housing. The ordinance will remove regulatory barriers to allow for the temporary re-use of existing structures for residential purposes. The proposed amendment to LAMC Section 12.03 would formalize the definitions of Supportive Housing, Transitional Housing, and Supportive Services to reflect existing state law. The proposed amendments to LAMC Section 14.00 would change the approval process to allow existing residential structures such as Hotels, Motels, Apartment Hotels, Transient Occupancy Residential Structures & Hostels to conduct minor interior alterations & a temporary change of use to supportive housing and/or transitional housing. The supportive housing/transitional housing use is temporary, and is contingent upon the existence of a valid contract with a local

public agency to provide that use; upon termination of any such contract, the Interim Motel Conversion Project would be required to revert to the previous legally existing use. Provisions are included in this section to ensure that the temporary change in use will not result in any increase in building footprint, the number of units, or the overall building height. The proposed amendments to LAMC Section 151.02 would amend the City's Rent Stabilization Ordinance to include an exemption for such projects, which are operating under the protection of a contract to provide the supportive housing and/or transitional housing use. REVIEW/COMMENT period ends: Dec. 20, 2017

MITIGATED NEGATIVE DECLARATION-NG-17-140-PL: [ENV-2017-3137](#). Citywide zoning ordinance affecting all parcels in the City of Los Angeles zoned for multifamily residential use & located within High Quality Transit Areas (HQTA). Additionally, PSH development could occur on some parcels zoned Public Facilities (PF), and on some sites which are currently protected under the City's Residential Hotel Unit Conversion & Demolition Ordinance in LAMC Section 47.70 et seq. CD's 1-15. The Proposed Permanent Supportive Housing (PSH) Project is an ordinance (PSH Ordinance) that would amend the City of Los Angeles Municipal Code (LAMC) to facilitate development of PSH units. The purpose of this ordinance is to improve the process for the development of these units. The Proposed PSH Project would amend Sections 12.03, 12.04.09, 14.00 & 16.05 of the LAMC establishing regulations that define PSH & project eligibility criteria, establish unique development standards for PSH, and facilitate administrative review & approval, as well as modify certain provisions related to height & density, consistent with State Density Bonus Law. The PSH Ordinance would allow for projects to select up to four concessions with respect to Zoning Code, including up to 20% decrease in required setbacks, up to 20% reduction in required open space, up to 20% increase in lot coverage limits, up to 35% increase in FAR and depending on the height district up to a 35% increase in height or one additional story. Additional design requirements include that when adjacent to or across an alley from an R2 or more restrictive zone, the building's transitional height shall be stepped-back within a 45-degree angle. REVIEW/COMMENT period ends: Dec. 20, 2017

Attachments To The
Channel Law Comments On The Environmental Documentation For, And The,
Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And
Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd
(APN 4238-024-900 To 911)
December 20, 2017

Attachment 6
CEQANet, State Clearinghouse Records for SCAG's RTP/SCS EIR



[OPR Home](#) > [CEQAnet Home](#) > [CEQAnet Query](#) > Search Results

Click Project Title link to display all related documents. Document Type link will display full document description.

Records Found: 8

[First] [Next] [Previous] [Last]

Page: 1

Query Parameters:

Date Range:

SCH#	Lead Agency	Project Title	Description	Document Type	Date Received
2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	The 2016 RTP/SCS Amendment #1 includes the inclusion and/or revision to 76 transportation projects, or approx. 2 percent of the total 2016 RTP/SCS projects. Changes include revisions to the project scope, cost and/or schedule to 54 projects already included in the 2016 RTP/SCS and inclusion of 22 new projects. The revisions and additions to the Project List will not result in substantial changes to the previously adopted 2016 RTP/SCS. (for further details, please refer to Page 4 "Project Description" in the ADD PEIR). An Addendum EIR was prepared since revisions would not result in new significant impacts or substantial increases to impacts.	NOD	7/11/2017
2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	Note: Review Per Lead The 2016 RTP/SCS Amendment #1 includes the inclusion and/or revision to 76 transportation projects, or approx. 2 percent of the total 2016 RTP/SCS projects. Changes include revisions to the project scope, cost and/or schedule to 54 projects already included in the 2016 RTP/SCS and inclusion of 22 new projects. The revisions and additions to the Project List will not result in substantial changes to the previously adopted 2016 RTP/SCS. (for further details, please refer to Page 4 "Project Description" in the ADD PEIR). An Addendum EIR was prepared since revisions would not result in new significant impacts or substantial increases to impacts.	ADM	7/10/2017
2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	The 2016 RTP/SCS Amendment #1 includes the inclusion and/or revision to 76 transportation projects, or approx. 2 percent of the total 2016 RTP/SCS projects. Changes include revisions to the project scope, cost and/or schedule to 54 projects already included in the 2016 RTP/SCS and inclusion of 22 new projects. The revisions and additions to the Project List will not result in substantial changes to the previously adopted 2016 RTP/SCS. (for further details, please refer to Page 4 "Project Description" in the ADD PEIR). An Addendum EIR was prepared since revisions would not result in new significant impacts or substantial increases to impacts.	ADM	4/10/2017
2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	The 2016 RTP/SCS Amendment #1 includes the inclusion and/or revision to 76 transportation projects, or approx. 2 percent of the total 2016 RTP/SCS projects. Changes include revisions to the project scope, cost and/or schedule to 54 projects already included in the 2016 RTP/SCS and inclusion of 22 new projects. The revisions and additions to the Project List will not result in substantial changes to the previously adopted 2016 RTP/SCS. (for further details, please refer to Page 4 "Project Description" in the ADD PEIR). An Addendum EIR was prepared since revisions would not result in new significant impacts or substantial increases to impacts.	NOD	4/10/2017
2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	Note: FYI Final The 2016 RTP/SCS updates the last adopted 2012 RTP/SCS, last amended in Sept. 2014, by refining goals, objectives, and policies and list of projects, and extending the planning horizon to 2040. As with the 2012 RTP/SCS, the 2016 RTP/SCS is intended to continue the region's various	FIN	4/8/2016

strategies that improve the balance between land use and transportation and transit systems, both current and future.

2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	The 2016 RTP/SCS updates the last adopted 2012 RTP/SCS, last amended in Sept. 2014, by refining goals, objectives, and policies and list of projects, and extending the planning horizon to 2040. As with the 2012 RTP/SCS, the 2016 RTP/SCS is intended to continue the region's various strategies that improve the balance between land use and transportation and transit systems, both current and future.	Oth	4/8/2016
2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	Note: Extended Review per lead. The 2016 RTP/SCS updates the last adopted 2012 RTP/SCS, last amended in Sept. 2014, by refining goals, objectives, and policies and list of projects, and extending the planning horizon to 2040. As with the 2012 RTP/SCS, the 2016 RTP/SCS is intended to continue the region's various strategies that improve the balance between land use and transportation and transit systems, both current and future.	EIR	12/4/2015
2015031035	Southern California Association of Governments	Addendum #2 to the 2016-2040 RTP/SCS	The 2016 RTP/SCS updates the last adopted 2012 RTP/SCS, last amended in Sept. 2014, by refining goals, objectives, and policies and list of projects, and extending the planning horizon to 2040. As with the 2012 RTP/SCS, the 2016 RTP/SCS is intended to continue the region's various strategies that improve the balance between land use and transportation and transit systems, both current and future.	NOP	3/9/2015

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Addendum #2 to the 2016-2040 RTP/SCS

SCH Number: 2015031035

Document Type: EIR - Draft EIR

Project Lead Agency: Southern California Association of Governments

Project Description

Note: Extended Review per lead. The 2016 RTP/SCS updates the last adopted 2012 RTP/SCS, last amended in Sept. 2014, by refining goals, objectives, and policies and list of projects, and extending the planning horizon to 2040. As with the 2012 RTP/SCS, the 2016 RTP/SCS is intended to continue the region's various strategies that improve the balance between land use and transportation and transit systems, both current and future.

Contact Information

Primary Contact:

Ms. Lijin Sun
Southern California Association of Governments
213-236-1882
818 W. 7th Street; 12th Floor
Los Angeles, CA 90017-3435

Project Location

County: Los Angeles
City: Los Angeles, City of
Region:
Cross Streets:
Latitude/Longitude:
Parcel No:
Township:
Range:
Section:
Base:
Other Location Info: six-county area

Proximity To

Highways:
Airports:
Railways:
Waterways:
Schools:
Land Use:

Development Type

Power: Hydroelectric

Local Action

Project Issues

Agricultural Land, Air Quality, Archaeologic-Historic, Biological Resources, Coastal Zone, Drainage/Absorption, Economics/Jobs, Fiscal Impacts, Flood Plain/Flooding, Forest Land/Fire Hazard, Geologic/Seismic, Minerals, Noise, Population/Housing Balance, Public Services, Recreation/Parks, Schools/Universities, Sewer Capacity, Soil Erosion/Compaction/Grading, Solid Waste, Toxic/Hazardous, Traffic/Circulation, Vegetation, Water Quality, Wetland/Riparian, Water Supply, Growth Inducing, Landuse, Cumulative Effects, Aesthetic/Visual

Reviewing Agencies (Agencies in **Bold Type** submitted comment letters to the State Clearinghouse)

Resources Agency; California Coastal Commission; Coachella Valley Mountains Conservancy; **Department of Fish and Wildlife, Headquarters**; Cal Fire; Office of Emergency Services, California; California Highway Patrol; Caltrans, Division of Transportation Planning; Air Resources Board, Transportation Projects; State Water Resources Control Board, Division of Water Quality; Regional Water Quality Control Board, Region 4; Regional Water Quality Control Bd., Region 6 (Victorville); **Regional Water Quality Control Bd., Region 6 (So Lake Tahoe)**; Regional Water Quality Control Board, Region 7; Regional Water Quality Control Board, Region 8; Regional Water Quality Control Board, Region 9; Native American Heritage Commission; Public Utilities Commission

Date Received: 12/4/2015 **Start of Review:** 12/4/2015 **End of Review:** 2/1/2016

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Addendum #2 to the 2016-2040 RTP/SCS

SCH Number: 2015031035

Document Type: ADM - Addendum

Alternate Title: 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS)

Project Lead Agency: Southern California Association of Governments

Project Description

Note: Review Per Lead The 2016 RTP/SCS Amendment #1 includes the inclusion and/or revision to 76 transportation projects, or approx. 2 percent of the total 2016 RTP/SCS projects. Changes include revisions to the project scope, cost and/or schedule to 54 projects already included in the 2016 RTP/SCS and inclusion of 22 new projects. The revisions and additions to the Project List will not result in substantial changes to the previously adopted 2016 RTP/SCS. (for further details, please refer to Page 4 "Project Description" in the ADD PEIR). An Addendum EIR was prepared since revisions would not result in new significant impacts or substantial increases to impacts.

Contact Information

Primary Contact:

Ping Chang
Southern California Association of Governments
213-236-1839
818 W. 7th Street; 12th Floor
Los Angeles, CA 90017-3435

Project Location

County: Los Angeles
City:
Region:
Cross Streets:
Latitude/Longitude:
Parcel No:
Township:
Range:
Section:
Base:
Other Location Info: six-county area

Proximity To

Highways:
Airports:
Railways:
Waterways:
Schools:
Land Use:

Development Type

Other (2016 RTP/SCS)

Local Action

Project Issues

Coastal Zone, Drainage/Absorption, Economics/Jobs, Fiscal Impacts, Flood Plain/Flooding, Forest Land/Fire Hazard, Geologic/Seismic, Minerals, Noise, Population/Housing Balance, Public Services, Recreation/Parks, Schools/Universities, Sewer Capacity, Soil Erosion/Compaction/Grading, Solid Waste, Toxic/Hazardous, Traffic/Circulation, Vegetation, Water Quality, Wetland/Riparian, Water Supply, Growth Inducing, Landuse, Cumulative Effects, Aesthetic/Visual, Agricultural Land, Septic System, Air Quality, Archaeologic-Historic

Reviewing Agencies (Agencies in **Bold Type** submitted comment letters to the State Clearinghouse)

Resources Agency; Department of Fish and Wildlife, Headquarters; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, Division of Transportation Planning; Native American Heritage Commission; Public Utilities Commission; Regional Water Quality Control Board, Region 4; Regional Water Quality Control Bd., Region 6 (Victorville); Regional Water Quality Control Board, Region 7; Regional Water Quality Control Board, Region 8; Regional Water Quality Control Board, Region 9; Air Resources Board, Transportation Projects

Date Received: 7/10/2017 **Start of Review:** 7/10/2017 **End of Review:** 8/24/2017

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Appendices – Channel Law Letter

February 12, 2018

Comments On The Environmental Documentation For, And The, Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd (APN 4238-024-900 To 911)

APPENDIX B

**Minutes From Planning Commission Meeting from December 14, 2017
through February 8, 2018.**

**LOS ANGELES CITY PLANNING COMMISSION
OFFICIAL MINUTES
THURSDAY, DECEMBER 14, 2017**

CITY HALL COUNCIL CHAMBER
200 NORTH SPRING STREET, ROOM 340
LOS ANGELES CALIFORNIA 90012

THESE MINUTES OF THE LOS ANGELES CITY PLANNING COMMISSION ARE REPORTED IN ACTION FORMAT. COMPLETE DETAILS, INCLUDING THE DISCUSSION, RELATING TO EACH ITEM ARE CONTAINED IN THE AUDIO RECORDING FOR THIS MEETING. RECORDINGS ARE ACCESSIBLE ON THE INTERNET AT <http://planning.lacity.org>. OR MAY BE REQUESTED BY CONTACTING CENTRAL PUBLICATIONS AT (213) 978-1255.

Commission President David Ambroz called the regular meeting to order at 8:34 a.m. with Commission Vice President Renee Dake Wilson and Commissioners Vahid Khorsand, Samantha Millman, Marc Mitchell, Veronica Padilla-Campos and Dana Perlman in attendance. Commissioner Caroline Choe arrived at approximately 8:41 a.m.

Commissioner John Mack was absent.

Also in attendance were Vincent Bertoni, Director of Planning, Kevin Keller, Executive Officer, Lisa Webber, Deputy Planning Director and Donna Wong, Deputy City Attorney. Commission Office staff present were James K. Williams, Commission Executive Assistant II, Cecilia Lamas, Senior Administrative Clerk and Rocky Wiles, Commission Office Manager.

ITEM NO. 1

Planning Director Vince Bertoni introduced Tom Rothmann, Principal Planner and Phyllis Nathanson, Senior City Planner who gave an update on the sign ordinance.

Deputy City Attorney, Donna Wong had no report.

ITEM NO. 2

COMMISSION BUSINESS:

- Advance Calendar: There were no changes to the advanced calendar
- Commission Requests: Commissioner Khorsand requested information on using TAP cards as a mitigation measure to encourage public transit.
- Minutes of Meeting: Commissioner Perlman moved to approve the Minutes of November 9, 2017. The action was seconded by Commissioner Millman and the vote proceeded as follows:

Moved: Perlman
Seconded: Millman
Ayes: Ambroz, Khorsand, Padilla-Campos, Dake Wilson
Absent: Mack, Choe

Vote: 7 – 0

MOTION PASSED

ITEM NO. 3

NEIGHBORHOOD COUNCIL PRESENTATION:

There were two submissions by the Mid-City West Community Council on Item Nos. 8 and 9.

Commissioner Choe joined the meeting.

ITEM NO. 4

PUBLIC COMMENT:

No speakers requested to address the Commission.

ITEM NO. 5a

RECONSIDERATIONS

There were no requests for reconsideration.

President Ambroz took Item No. 10 out of order.

ITEM NO. 10

[CPC-2016-3608-GPA-ZC-HD-MCUP-CU-SPR](#)

CEQA: ENV-2016-3609-MND

Plan Area: Wilshire

Related Case: VTT-74511

Council District: 10 – Wesson

Last Day to Act: 01-12-18

PUBLIC HEARING – Completed November 8, 2017

PROJECT SITE: 800 South Western Avenue;
800 - 824 South Western Avenue;
3564 - 3566 West 8th Street;
3550, 3558, 3560 West 8th Street;
801 South Oxford Avenue

ADD AREA: 801 – 874 South Western Avenue;
855 South Manhattan Place

IN ATTENDANCE:

Kinikia Gardner, City Planner, Jane Choi, Senior City Planner and Shana Bonstin, Principal City Planner representing the Planning Department; Edgar Khalatian, Mayer Brown, LLP and Eric Olsen, TCA Architects, representing the applicant Western Plaza Capital Holding, LLC; Jordan Beroukhim, representing the Office of Council President Wesson.

MOTION:

Commissioner Dake Wilson put forth the actions below in conjunction with the approval of the following project with modifications as stated on the record by the Commission:

Demolition of the Eden Plaza building and the adaptive reuse and addition onto the existing 4-story IB Plaza Building, the construction use and maintenance of a new 12-story mixed-use building, and a new 3-story commercial building. The Project will include approximately 148 guest rooms (limited service hotel), 96 apartment units with 8 units set aside for Very Low Income Households, 58,343 square feet of commercial floor area with retail uses and restaurants with or without alcohol service and 241 vehicle parking spaces. The Project will include approximately 229,138 square feet of floor area, with a proposed floor area ratio (FAR) of 3.72:1. The amount of soils removed or exported would be approximately 20,000 cubic yards.

1. **Find**, based on the independent judgment of the decision-maker, after consideration of the whole of the administrative record, the project was assessed in Mitigated Negative Declaration, No. ENV-2016-3609-MND, adopted on November 13, 2017 (under Case No. VTT-74511) and reflected in the errata dated November 2, 2017 with mitigation measures and the Mitigation Monitoring Project prepared for the Mitigated Negative Declaration; and pursuant to CEQA Guidelines, Sections 15162 and 15164, no subsequent EIR, negative declaration, or addendum is required for approval of the project;
2. **Approve**, pursuant to Charter Section 555 and Section 11.5.6 of the Los Angeles Municipal Code (LAMC), a General Plan Amendment to the Wilshire Community Plan to amend Footnote 5.1 of the Community Plan's General Plan Land Use Map to apply to the property and the Add Area;
3. **Approve**, pursuant to LAMC Section 12.32 F, and **recommend** that the City Council adopt a Vesting Zone Change and Height District Change for the property from Height District No. 1 to Height District No. 2 to allow a Floor Area Ratio of 4:1 in lieu of 1.5:1;
4. **Approve**, pursuant to LAMC Section 12.22 A.25(g)(3), a Density Bonus setting aside eight (8) dwelling units for Very Low Income Households as Restricted Affordable Units for the following one (1) off-menu incentive:
 - (a) A reduction in one side yard to 2 feet 6 inches in lieu of the 15-foot side yard requirement as specified in LAMC Section 12.22.A.18(c)(2);
5. **Approve**, pursuant to LAMC Section 12.24 W.1, a Master Conditional Use for the sale or dispensing of a full line of alcoholic beverages for on-site consumption at six (6) restaurants on the premises;
6. **Approve**, pursuant to LAMC Section 12.24 W.24(a), a Conditional Use to permit a hotel located within 500 feet of an R-zoned property;
7. **Approve**, pursuant to LAMC Section 16.05, a Site Plan Review for a project with 96 dwelling units and 148 guest rooms;
8. **Adopt** the Conditions of Approval as modified by the Commission; and
9. **Adopt** the Findings.

The action was seconded by Commissioner Khorsand and the vote proceeded as follows:

Moved: Dake Wilson
 Seconded: Khorsand
 Ayes: Ambroz, Millman, Mitchell, Padilla-Campos
 Noes: Choe, Perlman
 Absent: Mack

Vote: 6 – 2

MOTION PASSED

President Ambroz recessed the meeting at 9:45 a.m. The meeting was reconvened at 9:52 a.m. with Commissioners Choe, Khorsand, Millman, Mitchell, Padilla-Campos, Perlman and Dake Wilson present.

ITEM NO. 6a

President Ambroz removed Item No. 6a from the consent calendar.

CPC-2014-4942-ZC-HD-DB-SPR

CEQA: ENV-2014-4943-MND

Plan Area: Wilshire

Council District: 1 - Cedillo

Last Day to Act: 12-19-17

PUBLIC HEARING – Completed July 24, 2017

PROJECT SITE: 2501 – 2515 West Olympic Boulevard;
980 – 992 South Arapahoe Street;
981 South Hoover Street

IN ATTENDANCE:

Mindy Nguyen, City Planner, Jane Choi, Senior City Planner and Shana Bonstin, Principal City Planner representing the Planning Department; James Santa Maria, Santa Maria Group and Tom Michali, Architect, representing the applicant.

MOTION:

Commissioner Ambroz moved to continue the matter to the City Planning Commission Meeting of February 8, 2018. The action was seconded by Commissioner Choe and the vote proceeded as follows:

Moved: Ambroz
Seconded: Choe
Ayes: Khorsand, Millman, Mitchell, Padilla-Campos, Perlman, Dake Wilson
Absent: Mack

Vote: 8 – 0

MOTION PASSED

ITEM NO. 7

CPC-2016-3748-DB-CUB-VCU-SPR

CEQA: ENV-2016-3749-MND

Plan Area: Wilshire

Council District: 10 – Wesson

Last Day to Act: 12-14-17

Continued from: 11-09-17

PUBLIC HEARING – Completed August 2, 2017

PROJECT SITE: 631 South Vermont Avenue (621 – 643 South Vermont Avenue)

IN ATTENDANCE:

Jenna Monterrosa, City Planner, Nick Hendricks, Senior City Planner and Charlie Rausch, Interim Chief Zoning Administrator; Joel Miller, PSOMAS, and Francis Park, Park and Vallejos, representing the applicant.

MOTION:

Commissioner Dake Wilson put forth the actions below in conjunction with the approval of the following project with modifications as stated on the record by the Commission:

A 33-story mixed-use building, measuring up to 450 feet in height, containing a new hotel with up to 200 rooms, approximately 16,410 square feet of office floor area, approximately 28,490 square feet of retail/restaurant floor area, 28,384 square-feet of open space and amenities, and up to 250 residential condominium units including 22 very-low income units. A total of 483 vehicular parking spaces will be provided; of which 279 will service residential uses and 204 will service commercial uses. The project site is currently developed with a used car sales office and lot, restaurant, and surface parking lot that will be demolished in conjunction with the proposed project.

1. **Find**, pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including the Mitigated Negative Declaration, No. ENV-2016-3749-MND, (“Mitigated Negative Declaration”), and all comments received, with the imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; **find**, the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; **find**, the mitigation measures have been made enforceable conditions on the project; and **adopt** the Mitigated Negative Declaration and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;
2. **Approve**, pursuant to Los Angeles Municipal Code (LAMC) Section 12.22-A,25, a Density Bonus, for an approximately 28.6% density bonus and the provision of 11% Very Low Income affordable housing units with an Off-Menu Incentive for increased Floor Area Ratio (FAR) up to 12:1 to exceed the FAR otherwise allowed by Footnote No. 6 in the Wilshire Community Plan land use policy map;
3. **Approve**, pursuant to LAMC Section 12.24-W,1, a Conditional Use, for on-site sales and consumption of alcoholic beverages in conjunction with a hotel;
4. **Approve**, pursuant to LAMC Sections 12.24-W, 24 and 12.24-T, a Vesting Conditional Use, to permit a hotel use within 500 feet of a residential zone;
5. **Approve**, pursuant to LAMC Section 16.05, a Site Plan Review for the construction of 250 residential condominium units and 200 hotel guest rooms;
6. **Adopt** the Conditions of Approval as modified by the Commission; and
7. **Adopt** the Findings.

The action was seconded by Commissioner Choe and the vote proceeded as follows:

Moved: Dake Wilson
 Seconded: Choe
 Ayes: Khorsand, Millman, Mitchell, Padilla-Campos, Perlman, Dake Wilson
 Absent: Mack

Vote : 8 – 0

MOTION PASSED

ITEM NO. 8

CPC-2014-2906-TDR-SPR

CEQA: ENV-2014-2907-MND

Plan Area: Central City

Council District: 14 – Huizar

Last Day to Act: 12-14-17

PUBLIC HEARING – Completed January 26, 2017

PROJECT SITE: 601 South Main Street;
601 – 641 South Main Street;
108 – 114 West 6th Street

IN ATTENDANCE:

May Sirinopwongsagon, City Planner, Blake Lamb, Principal City Planner and Shana Bonstin, Principal City Planner, representing the Department; Kate Bartolo representing the applicant.

MOTION:

Commissioner Ambroz moved to continue the matter to the City Planning Commission Meeting of February 8, 2018. The motion was seconded by Commissioner Khorsand and the vote proceeded as follows:

Moved: Ambroz
Seconded: Khorsand
Ayes: Choe, Millman, Mitchell, Padilla-Campos, Perlman, Dake Wilson
Absent: Mack

Vote: 8 – 0**MOTION PASSED**

President Ambroz recessed the meeting at 12:11 p.m. The meeting was reconvened at 12:26 p.m. with Commissioners Dake Wilson, Choe, Khorsand, Millman, Mitchell, Padilla-Campos and Perlman present.

President Ambroz took Item No. 12 out of order.

Commissioner Mitchell left the meeting at 1:00 p.m.

ITEM NO. 12

CPC-2017-3136-CA

CEQA: ENV-2017-3137-MND

SCAG 2016-2040 RTP/SCS PEIR (SCH No. 2015031035)

Plan Areas: All

Council Districts: All

Last Day to Act: N/A

PUBLIC HEARING – Completed September 25, 2017 and September 28, 2017

PROJECT AREA: Citywide**IN ATTENDANCE:**

Cally Hardy, City Planning Assistant, Claire Bowin, Senior City Planner and Ken Bernstein, Principal City Planner representing the Planning Department.

MOTION:

Commissioner Ambroz put forth the actions below in conjunction with the approval of the following ordinance with modifications as stated on the record by the Commission:

An ordinance amending Sections 12.03, 12.04.09, 14.00, and 16.05 of the Los Angeles Municipal Code establishing regulations to facilitate the production of Permanent Supportive Housing.

1. **Find** pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including Mitigated Negative Declaration No. ENV-2017-3137-MND (Mitigated Negative Declaration), and all comments received, with imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; **find** that the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; **find** the mitigation measures have been made enforceable conditions on the project; and adopt the Mitigated Negative Declaration; and **adopt** the Mitigated Negative Declaration and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;
2. **Approve** and **recommend** that the City Council **find**, based on their independent judgement, after consideration of the whole of the administrative record, including the SCAG 2016-2040 RTP/SCS PEIR (SCH No. 2015031035), certified on April 7, 2016 (EIR) and the Addendum prepared for the PSH Ordinance (Addendum), the project was assessed in the EIR and pursuant to the CEQA Guidelines, Sections 15162 and 15164 and the Addendum that no major revisions to the EIR are required and no subsequent EIR, or negative declaration is required for approval of the project;
3. **Adopt** the staff report as the Commission report on the subject;
4. **Approve** and **recommend** that the City Council **adopt** the proposed ordinance, as amended by the Commission, subject to review by the City Attorney as to form and legality; and
5. **Adopt** and **recommend** that the City Council **adopt** the Findings.

The action was seconded by Commissioner Khorsand and the vote proceeded as follows:

Moved: Ambroz
 Seconded: Khorsand
 Ayes: Choe, Millman, Padilla-Campos, Perlman, Dake Wilson
 Absent: Mack, Mitchell

Vote: 7 – 0

MOTION PASSED

Commissioner Padilla-Campos left the meeting at 3:00 p.m.

President Ambroz recessed the meeting at 3:04 p.m. The meeting was reconvened at 3:12 p.m. with Commissioners Choe, Khorsand, Millman, Perlman and Dake Wilson present.

ITEM NO. 9
CPC-2014-2590-TDR-SPR

CEQA: ENV-2014-2591-MND

Plan Area: Central City

Related Case: VTT-72343-CN

Council District: 14 – Huizar

Last Day to Act: 12-14-17

PUBLIC HEARING – Completed April 27, 2017**PROJECT SITE:** 920 South Hill Street;
916 – 930 South Hill Street**IN ATTENDANCE:**

May Sirinopwongsagon, City Planner, Blake Lamb, Principal City Planner and Shana Bonstin, Principal City Planner, representing the Planning Department; Kate Bartolo representing the applicant.

MOTION:

Commissioner Dake Wilson moved to continue the matter to the City Planning Commission Meeting of December 21, 2017. The action was seconded by Commissioner Ambroz and the vote proceeded as follows:

Moved: Dake Wilson
 Second: Ambroz
 Ayes: Choe, Khorsand, Millman, Perlman
 Absent: Mack, Mitchell, Padilla-Campos

Vote: 6 – 0**MOTION PASSED**

ITEM NO. 11
CPC-2017-1103-DB

CEQA: ENV-2017-1104-CE

Plan Area: Northeast Los Angeles

Council District: 14 – Huizar

Last Day to Act: 12-19-17

PUBLIC HEARING – Completed September 19, 2017**PROJECT SITE:** 1332 West Colorado Boulevard**IN ATTENDANCE:**

Azeen Khanmalek, City Planning Associate representing the Planning Department; Heather Lee representing the applicant Imad Boukai, General Procurement.

MOTION:

Commissioner Dake Wilson moved to continue the matter to the City Planning Commission Meeting of January 11, 2018. The action was seconded by Commissioner Ambroz and the vote proceeded as follows:

Moved: Dake Wilson
 Seconded: Ambroz

Ayes: Choe, Khorsand, Millman, Perlman
 Absent: Mack, Mitchell, Padilla-Campos

Vote: 6 – 0

MOTION PASSED

Commissioner Choe left the meeting at approximately 3:15 p.m.

ITEM NO. 13

CPC-2017-3409-CA

CEQA: ENV-2017-4476-CE,
 ENV-2017-3410-ND

Plan Areas: All

Council Districts: All
 Last Day to Act: N/A

PUBLIC HEARING – Completed September 25, 2017 and September 28, 2017

PROJECT AREA: Citywide

IN ATTENDANCE:

Cally Hardy, City Planning Assistant, Matthew Glesne, City Planner, Claire Bowin, Senior City Planner and Ken Bernstein, Principal City Planner representing the Planning Department.

MOTION:

Commissioner Dake Wilson put forth the actions below in conjunction with the approval of the following ordinance:

An ordinance amending Sections 12.03, 14.00 and 151.02 of the Los Angeles Municipal Code establishing regulations to facilitate the use of existing hotels and motels for Supportive Housing and/or Transitional Housing.

1. **Determine**, based on the whole of the administrative record, that the proposed ordinance is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15301, and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines Section 15300.2 applies;
2. **Approve and recommend** that the City Council **find**, pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including the Negative Declaration, No. ENV-2017-3410-ND (“Negative Declaration”), and all comments received, there is no substantial evidence that the project will have a significant effect on the environment; find the Negative Declaration reflects the independent judgment and analysis of the City; and adopt the Negative Declaration;
3. **Approve and recommend** that the City Council adopt the proposed ordinance;
4. **Adopt** the Staff Report as the Commission Report on the subject; and
5. **Adopt** the Findings.

The action was seconded by Commissioner Millman and the vote proceeded as follows:

Moved: Dake Wilson
Seconded: Millman
Ayes: Ambroz, Khorsand, Perlman
Absent: Choe, Mack, Mitchell, Padilla-Campos

Vote: 5 – 0

MOTION PASSED

ITEM NO. 14

CPC-2017-4546-CA
CEQA: ENV-2017-3361-SE
Plan Areas: All

Council Districts: All
Last Day to Act: N/A

PUBLIC HEARING HELD

PROJECT AREA: Citywide

IN ATTENDANCE:

Niall Huffman, City Planning Associate, Phyllis Nathanson, Senior City Planner and Tom Rothmann, Principal City Planner representing the Planning Department; Kenneth Fong Deputy City Attorney, representing the City Attorney’s Office.

MOTION:

Commissioner Ambroz moved to continue the matter to the City Planning Commission Meeting of December 21, 2017. The action was seconded by Commissioner Khorsand and the vote proceeded as follows:

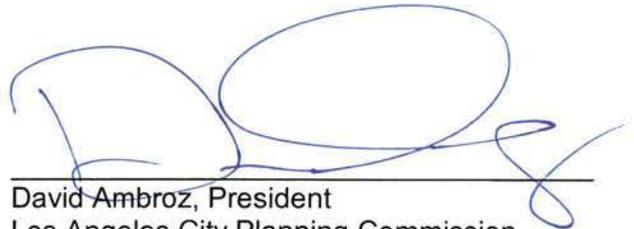
Moved: Ambroz
Seconded: Khorsand
Ayes: Millman
Noes: Perlman, Dake Wilson
Absent: Choe, Mack, Mitchell, Padilla-Campos

Vote: 3 – 2

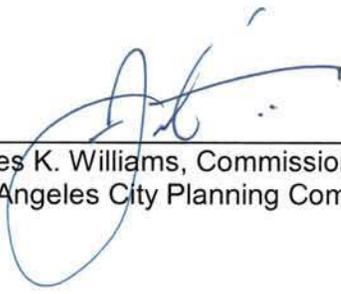
MOTION FAILED

Pursuant to Rule No. 8.5 of the City Planning Commission’s Rules and Operating Procedures, the matter is therefore continued to the next regular meeting of the Commission on December 21, 2017.

Commissioner Ambroz left the meeting at approximately 4:09 p.m. and quorum was lost. Commission Vice President Dake Wilson adjourned the meeting at 4:15 p.m.



David Ambroz, President
Los Angeles City Planning Commission



James K. Williams, Commission Executive Assistant II
Los Angeles City Planning Commission

ADOPTED
CITY OF LOS ANGELES
DEC 21 2017
CITY PLANNING DEPARTMENT
COMMISSION OFFICE

**LOS ANGELES CITY PLANNING COMMISSION
OFFICIAL MINUTES
THURSDAY, DECEMBER 21, 2017**

VAN NUYS CITY COUNCIL CHAMBERS
14410 SYLVAN STREET, 2ND FLOOR
VAN NUYS CALIFORNIA 91401

THESE MINUTES OF THE LOS ANGELES CITY PLANNING COMMISSION ARE REPORTED IN ACTION FORMAT. COMPLETE DETAILS, INCLUDING THE DISCUSSION, RELATING TO EACH ITEM ARE CONTAINED IN THE AUDIO RECORDING FOR THIS MEETING. RECORDINGS ARE ACCESSIBLE ON THE INTERNET AT <http://planning.lacity.org>. OR MAY BE REQUESTED BY CONTACTING CENTRAL PUBLICATIONS AT (213) 978-1255.

Commission President David Ambroz called the regular meeting to order at 8:34 a.m. with Commissioners Caroline Choe, Vahid Khorsand, Samantha Millman, Marc Mitchell, Veronica Padilla-Campos and Dana Perlman in attendance.

Commissioners John Mack and Renee Dake Wilson were absent.

Also in attendance were Vincent Bertoni, Director of Planning, Kevin Keller, Executive Officer, Lisa Webber, Deputy Planning Director and Amy Brothers, Deputy City Attorney. Commission Office staff present were James K. Williams, Commission Executive Assistant II, Cecilia Lamas, Senior Administrative Clerk and Rocky Wiles, Commission Office Manager.

ITEM NO. 1

DIRECTOR'S REPORT AND COMMISSION BUSINESS

- Planning Director Vince Bertoni gave no report.
- Legal actions and issues update: Deputy City Attorney, Amy Brothers had no report.
- Advance Calendar: There were no changes to the advanced calendar
- Commission Requests: There were no requests.
- Minutes of Meeting:
Commissioner Choe moved to approve the Minutes of November 16, 2017. The action was seconded by Commissioner Millman and the vote proceeded as follows:

Moved: Choe
Seconded: Millman
Ayes: Ambroz, Khorsand, Mitchell, Padilla-Campos, Perlman
Absent: Mack, Dake Wilson

Vote: 7 – 0

MOTION PASSED

- Commissioner Padilla Campos moved to approve the Minutes of December 14, 2017. The action was seconded by Commissioner Choe and the vote proceeded as follows:

Moved: Padilla-Campos
Seconded: Choe

Ayes: Ambroz, Khorsand, Millman, Mitchell, Perlman
Absent: Mack, Dake Wilson

Vote: 7 – 0

MOTION PASSED

ITEM NO. 2

NEIGHBORHOOD COUNCIL PRESENTATION:

There were no presentations by any Neighborhood Council representative or resolutions submitted to the Commission.

ITEM NO. 3

GENERAL PUBLIC COMMENT:

No speakers requested to address the Commission.

ITEM NO. 4a

RECONSIDERATIONS

There were no requests for reconsideration.

President Ambroz took Item No. 7 out of order.

ITEM NO. 7

[CPC-2017-4292-SP](#)

CEQA: ENV-1988-0026-SP-ZC-DA
Plan Area: Chatsworth-Porter Ranch

Council District: 12 – Englander
Last Day to Act: 12-21-17

PUBLIC HEARING HELD

PROJECT SITE: 19701 Rinaldi Street

IN ATTENDANCE:

Luciralia Ibarra, Senior City Planner and Charlie Rausch, Acting Chief Zoning Administrator representing the Planning Department; Tom Stemnock, Planning Associates, representing the applicant Porter Ranch Development Company.

MOTION:

Commissioner Khorsand put forth the actions below in conjunction with the approval of the following:

Amendment of the Porter Ranch Land Use/Transportation Specific Plan, Section 9.O.3, relating to the "Equestrian Staging Area", in order to be consistent with the recent amendment to the Porter Ranch Development Agreement, heard on September 28, 2017, where the City Planning Commission considered and recommended approval to the Porter Ranch Development Agreement, amending the language of Section V.a.2.o.iii. "Equestrian Staging Area" to read as follows: "permit the improvement of an equestrian staging area located within 1000 feet north or south of the 118 Freeway, between De Soto Avenue to the east and Topanga Canyon Boulevard to the west, at a location identified and provided by the City of Los Angeles, in consultation with the affected Council office(s)."

1. **Recommend** that the City Council **find**, based on the independent judgment of the decision-maker, after consideration of the whole of the administrative record, the project was assessed in EIR No. 88-0026(SP)(ZC)(DA) SCH No.88050420 certified on July 10, 1990; and pursuant to CEQA Guidelines 15162 and 15164, and as supported by Addendums dated April 2000, September 2000, October 2006;
2. **Approve** and **recommend** that the City Council **approve**, pursuant to 12.32-E, of the Los Angeles Municipal Code (LAMC), an amendment to the Porter Ranch Land Use/Transportation Specific Plan, Section 9.O.3, relating to the "Equestrian Staging Area" in order to be consistent with the recent amendment to the Porter Ranch Development Agreement, heard by the City Planning Commission on September 28, 2017; and
3. **Adopt** the Findings.

The action was seconded by Commissioner Millman and the vote proceeded as follows:

Moved: Khorsand
 Seconded: Millman
 Ayes: Ambroz, Choe, Mitchell, Padilla-Campos, Perlman
 Absent: Mack, Dake Wilson

Vote: 7 – 0

MOTION PASSED

President Ambroz took Item No. 8 out of Order. Commissioner Khorsand left meeting at approximately 9:27 am.

ITEM NO. 8

[CPC-2017-3900-VZCJ-SPR-CDO](#)

CEQA: ENV-2006-7269-MND

Plan Area: Reseda – Van Nuys

Council District: 3 - Blumenfield

Last Day to Act: 01-08-18

PUBLIC HEARING HELD

(Previous public hearings were held on April 29, 2011, October 17, 2016 and June 23, 2017 under Case No. CPC-2008-4730-VZCJ-SPR-CDO)

PROJECT SITE: 6724 North Amigo Avenue

IN ATTENDANCE:

Valentina Knox-Jones, City Planner, Kevin Jones, Senior City Planner and Shana Bonstin, Principal City Planner representing the Planning Department; Arthur Kassan, representing the Department of Transportation, Athena Novak, Ahn & Associates representing the applicant Steve Zipp, One Amigo LLC; and Elizabeth Ene representing the Office of Councilmember Blumenfield.

MOTION:

Commissioner Millman put forth the actions below in conjunction with the approval of the following project with modifications as stated on the record:

The construction, use, and maintenance of a new 100-unit senior citizen (62 years and older) independent housing complex (99 units reserved for senior citizens and 1 manager's unit). The housing complex will total approximately 122,730 square-feet on an approximately 2.43 acres (105,771 square-foot) parcel. The project will provide a total of 143 parking stalls. The building's height will be a maximum of 45 feet within four stories. The project will include a gym, recreation room, community dining room, game room, library, computer room, and 16,600 square feet of open space. The proposed project will provide five percent (5%) of the total units at rents affordable to Extremely Low Income households (five units) and six percent (6%) of the total units at rents affordable to Very Low Income households (six units).

1. **Find**, pursuant to CEQA Guidelines Section 15074.1, the Substituted Mitigation Measure ("MM") for Aesthetics (MM I-120), Air Quality (MM III-50), Green House Gases (MM VII-10), and Noise (XII-20) is equivalent or more effective in mitigating or avoiding potentially significant effects than the Original MM and the Substituted MM in itself will not cause any potential significant effect on the environment; **Find**, pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including the Mitigated Negative Declaration, No. ENV-2006-7269-MND ("Mitigated Negative Declaration"), and all comments received, with the imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; **Find** the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; **Find** the mitigation measures have been made enforceable conditions on the project; and **Adopt** the Mitigated Negative Declaration, and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;
2. **Approve and Recommend** that the City Council Adopt a Vesting Zone Change from R1-1-RIO to (T)(Q)RD1.5-1-RIO (Multiple Residential Zone) on the center portion of the lot and from [Q]RA-1VL-CDORIO to (T)(Q)RAS4-1VL-CDO-RIO (Residential Accessory Services Zone) on the eastern portion of the lot;
3. **Approve**, pursuant to LAMC Section 11.5.11 (e), three (3) Developer Incentives:
 - a. A maximum height of 4 stories in lieu of the permitted 3 stories as permitted in the RAS4-1VL Zone;
 - b. A maximum height of 4 stories in lieu of the limitation in the Reseda-West Van Nuys Community Plan's Footnote No. 7 restricting the height of buildings in the General Commercial land use category to a maximum of 3 stories; and
 - c. Floor area, density, open space, and parking averaging over the project site and to permit vehicular access from a more restrictive zone (RD1.5) to a less restrictive zone (RAS4).
4. **Approve** the Site Plan Review for a residential apartment building 50 units or more;
5. **Approve** a Community Design Overlay Plan Approval within the Reseda Central Business District;
6. **Adopt** the Conditions of Approval as modified by the Commission, including the staff's technical modifications dated December 19, 2017; and
7. **Adopt** the Findings.

The action was seconded by Commissioner Perlman, who introduced a friendly amendment to the motion. The amendment was accepted by Commissioner Millman and the vote proceeded as follows:

Moved: Millman
 Seconded: Perlman
 Ayes: Ambroz, Choe, Mitchell, Padilla-Campos
 Absent: Khorsand, Mack, Dake Wilson

Vote: 6 – 0

MOTION PASSED

Commissioner Khorsand returned to the meeting. President Ambroz took Item No. 9 out of order.

ITEM NO. 9

[CPC-2017-849-GPAJ-VZCJ-HD-SPR](#)

CEQA: ENV-2017-850-MND

Plan Area: Central City

Council District: 14 - Huizar

Last Day to Act: 02-12-18

PROJECT SITE: 656 - 660 South Stanford Avenue

IN ATTENDANCE:

May Sirinopwongsagon, City Planner, Blake Lamb, Principal City Planner representing the Planning Department; Mee Semcken, Lee Consulting Group, LLC, representing the applicant Aaron Mandel, Lamp Lodge, LP.

MOTION:

Commissioner Perlman put forth the actions below in conjunction with the approval of the following project as recommended in the staff report with modifications by the Commission as stated on the record:

The removal of an existing three-story, 50-unit single-room occupancy residential building and surface parking lot for the construction of a new seven-story, approximately 48,970 square-foot residential building. The building will have a maximum of 82 residential dwelling units, with 81 units set aside for Very-Low Income households and one-unit designated as a manager's unit and will provide 16 automobile parking spaces and 91 bicycle parking spaces. The project would require the removal of two non-protected trees within the public right-of-way.

1. **Find**, pursuant to CEQA Guidelines Section 1507 4(b), after consideration of the whole of the administrative record, including the Mitigated Negative Declaration, No. ENV-2017-850-MND ("Mitigated Negative Declaration"), and all comments received, with the imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; **find** the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; **find** the mitigation measures have been made enforceable conditions on the project; and **adopt** the Mitigated Negative Declaration, and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;
2. **Approve**, pursuant to Charter Section 555 and Section 11.5.6 of the Los Angeles Municipal Code (LAMC), a General Plan Amendment to the Central City Community Plan to re-designate the land use of the Project Site from Light Manufacturing to Regional Commercial;
3. **Approve** and **recommend** that the City Council **adopt**, pursuant to LAMC Section 12.32 Q and F, a Vesting Zone Change and Height District Change on the Project Site from M2-2D to [T][Q]C2-2D, consistent with the proposed General Plan Amendment, and approve two Developer Incentives to permit:

- a. An 18 percent reduction in the required open space pursuant to LAMC Section 12.21 G and 12.22 A, 29 (c); and
 - b. a 48 percent reduction in the number of trees required pursuant to LAMC Section 12.21 G.
4. **Approve** the Site Plan Review for a project with 82 residential dwelling units;
 5. **Adopt** the Conditions of Approval including staff's technical correction and modifications to the staff report dated December 20, 2017; and
 6. **Adopt** the Findings.

The action was seconded by Commissioner Millman and the vote proceeded as follows:

Moved: Perlman
 Seconded: Millman
 Ayes: Ambroz, Khorsand, Mitchell, Padilla-Campos, Dake Wilson
 Absent: Mack, Dake Wilson

Vote : 7 – 0

MOTION PASSED

President Ambroz took Item No. 10 out of order.

ITEM NO. 10

CPC-2008-3470-SP-GPA-ZC-SUD-BL-M2

CEQA: ENV-2008-3471-EIR

Plan Area: Canoga Park-Winnetka-Woodland Hills-West Hills

Council District: 3 - Blumenfield

Last Day to Act: N/A

PROJECT AREA: Warner Center 2035 Plan Area

IN ATTENDANCE:

Jonathan Hershey, Senior City Planner, Craig Weber, Principal City Planner representing the Planning Department.

MOTION:

Commissioner Choe put forth the actions below in conjunction with the approval of the following ordinance along with staff's technical modifications dated December 20, 2017:

An ordinance, creating a Plan Implementation Board, to provide coordination on implementation activities required to effectuate the vision of the Warner Center 2035 Plan, pursuant to Sections 8 and 10.1 of the Plan, and to prioritize the expenditure of fees collected through implementation of the Warner Center 2035 Plan.

1. **Find**, based on the independent judgement of the decision-maker, after consideration of the whole of the administrative record, the project was assessed in EIR-2008-3471-EIR, SCH No. 1990011055, certified by City Council on April 24, 2013, and pursuant to CEQA Guidelines Sections 15162 and 15164, no subsequent EIR, negative declaration, or addendum is required for approval of the Project; and
2. **Approve** and **recommend** that the City Council **adopt** the proposed Ordinance creating the Plan Implementation Board, pursuant to Section 10.1 of the Warner Center 2035 Specific Plan.

Moved: Choe
 Seconded: Khorsand
 Ayes: Ambroz, Millman, Mitchell, Padilla-Campos
 Absent: Mack, Dake Wilson
 Abstained: Perlman

Vote: 7 – 0

MOTION PASSED

President Ambroz took Item No.11 out of order.

ITEM NO. 11

[CPC-2017-3951-CA](#)

CEQA: ENV-2017-3952-CE
 Plan Areas: All

Council Districts: All
 Last Day to Act: N/A

PROJECT SITE: Citywide

IN ATTENDANCE:

Patrick Whalen, City Planning Assistant, Phyllis Nathanson, Senior City Planner and Tom Rothmann, representing the Planning Department

MOTION:

Commissioner Khorsand put forth the actions below in conjunction with the approval of the following ordinance as recommended by staff:

An ordinance amending Sections 12.03, 12.21 and 12.26 of the Los Angeles Municipal Code (LAMC) to regulate Collection Bins.

1. **Determine** based on the whole of the administrative record, that the Project is exempt from CEQA pursuant to CEQA Guidelines, Section 15303 (Class 3), 15308 (Class 8 and 11), and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines;
2. **Approve** and **recommend** that the City Council **adopt** the proposed ordinance;
3. **Adopt** the staff report as the Commission report on the subject; and
4. **Adopt** the Findings.

The action was seconded by Commissioner Mitchell and the vote proceeded as follows:

Moved: Khorsand
 Seconded: Mitchell
 Ayes: Ambroz, Choe, Millman, Padilla-Campos, Perlman
 Absent: Mack, Dake Wilson

Vote: 7 – 0

MOTION PASSED

President Ambroz took Item No. 13 out of order.

ITEM NO. 13

CPC-2014-2590-TDR-SPR

CEQA: ENV-2014-2591-MND

Plan Area: Central City

Related Case: VTT-72343-CN

Council District: 14 – Huizar

Last Day to Act: 12-21-17

Continued From: 12-14-17

PROJECT SITE: 920 South Hill Street;
916 – 930 South Hill Street

IN ATTENDANCE:

May Sirinopwongsagon, City Planner, Blake Lamb, Principal City Planner and Shana Bonstin, Principal City Planner, representing the Planning Department; Kate Bartolo & Associates representing the applicant Joe Bednar, Agoura Oaks, LLC.

MOTION:

Commissioner Millman put forth the actions below in conjunction with the approval of the following project with modifications as stated on the record by the Commission:

The demolition of an existing surface parking lot, and the construction of a new 32-story, 346-foot, four-inch tall mixed-use, high-rise development consisting of 239 residential condominium units and four commercial condominium units with 5,671 square-feet of commercial space. The project would provide 295 parking spaces within in one subterranean level, and six above-grade parking levels.

1. **Find**, based on the independent judgment of the decision-maker, after consideration of the whole of the administrative record, the project was assessed in Mitigated Negative Declaration, No. ENV-2014-2591-MND, adopted on June 6, 2017 (under Case No. VTT 72343-CN); and pursuant to CEQA Guidelines, Sections 15162 and 15164, no subsequent EIR, negative declaration, or addendum is required for approval of the project;;
2. **Continue** the matter until a date uncertain, after and until the Agency Board acts on the requested TFAR Transfer Plan and Public Benefits Payment;;
3. **Approve**, pursuant to Section 16.05 of the Los Angeles Municipal Code, a Site Plan Review for a project with 239 residential dwelling units;
4. **Adopt** the Conditions of Approval including the staff's technical modification; and
5. **Adopt** the Findings.

The action was seconded by Commissioner Choe. Commissioner Ambroz introduced a friendly amendment to the motion. Commissioner Millman accepted the amendment and the vote proceeded as follows:

Moved: Millman
Second: Choe
Ayes: Ambroz, Khorsand, Mitchell, Padilla-Campos, Perlman
Absent: Mack, Dake Wilson

Vote: 7 – 0

MOTION PASSED

President Ambroz called for a break at approximately 10:51 a.m. and reconvened the meeting at 11:00 a.m. with Commissioners Choe, Khorsand, Millman, Mitchell, Padilla Campos and Perlman present.

President Ambroz took Item No.14 out of order.

ITEM NO. 14

CPC-2017-4546-CA

CEQA: ENV-2017-3361-SE

Plan Areas: All

Council Districts: All

Last Day to Act: N/A

Continued From: 12-14-17

PROJECT AREA: Citywide

IN ATTENDANCE:

Niall Huffman, City Planning Associate, Phyllis Nathanson, Senior City Planner and Tom Rothmann, Principal City Planner representing the Planning Department; Kenneth Fong, Deputy City Attorney representing the City Attorney's Office.

MOTION:

Commissioner Ambroz put forth the actions below in conjunction with the approval of the following ordinance with modifications as stated on the record by the Commission:

An ordinance enacting restrictions on commercial advertising of cannabis, cannabis products, commercial cannabis activity, or businesses engaged in any commercial cannabis activity on signs.

1. **Determine** that based on the whole of the administrative record, the project is exempt from CEQA pursuant to California Business and Professions Code Section 26055(h) on the basis that the project will adopt ordinances, rules and/or regulations that will require discretionary review under CEQA to approve licenses to engage in commercial cannabis activity in the City of Los Angeles;
2. **Approve** and **recommend** that the City Council **adopt** the proposed Ordinance;
3. **Adopt** the Staff Report as the Commission's Report on the subject; and
4. **Adopt** the Findings.

Moved: Ambroz

Seconded: Padilla-Campos

Ayes: Choe, Khorsand, Millman, Mitchell, Perlman

Absent: Mack, Dake Wilson

Vote: 7 – 0

MOTION PASSED

Commissioner Choe recused herself from Item No. 6 and left the meeting at approximately 11:37 a.m.

President Ambroz took Item No. 6 out of order.

ITEM NO. 6

[VTT-75032-CN-1A](#)

CEQA: ENV-2017-2441-CE

Related Case: DIR-2017-2442-SPR

Council District 10 – Wesson

Last Day to Act: 12-21-17

PROJECT SITE: 500 South Oxford Avenue

IN ATTENDANCE:

Joann Lim, City Planning Associate, Heather Bleemers, City Planner and Nicholas Hendricks, Senior City Planner representing the Planning Department; Boaz Miodovsky, Ketter Design representing the applicant Sang Hoon Chung, Fred & Jamison, LLC; Elsa Tung representing the appellant Tamika L. Butler, Los Angeles Neighborhood Land Trust.

President Ambroz called for a break at approximately 12:12 p.m. and reconvened the meeting at 12:20 p.m. with Commissioners Khorsand, Millman, Mitchell, Padilla Campos and Perlman present.

MOTION:

Commissioner Perlman put forth the actions below in conjunction with the approval of the following project with modifications as stated on the record by the Commission:

The merger and re-subdivision of four lots into one lot in conjunction with the construction, use, and maintenance of a proposed seven-story building with a maximum height of 89 feet containing 89 residential condominium units. The project will include 178 residential automobile parking spaces and 23 guest automobile parking within two subterranean levels and one at-grade level. Nine bicycle parking spaces will be located on the ground floor level. The project includes an application for a haul route for the export of 27,562 cubic yards of earth.

1. **Determine**, that the project is categorically exempt pursuant to California Environmental Quality Act (CEQA) Section 15332 (Class 32) and Section 15304 (Class 4, Category 1) and Section 21080 of the California Public Resources Code, and that there is no substantial evidence demonstrating that an exception to categorical exemption pursuant to CEQA Guidelines Section 15300.2 applies;
2. **Grant** the appeal in part, and **sustain** in part the Deputy Advisory Agency's determination to approve the Vesting Tentative Tract;
4. **Adopt** the Conditions of Approval with the modification to Condition No. 5 as recommended by staff; and
5. **Adopt** the Findings.

The action was seconded by Commissioner Khorsand and the vote proceeded as follows:

Moved: Perlman
 Seconded: Khorsand
 Ayes: Ambroz, Millman, Mitchell
 Noes: Padilla-Campos
 Absent: Choe, Mack, Dake Wilson

Vote: 5 – 1

MOTION PASSED

ITEM NO. 12

FREEWAY ADJACENT RESIDENTIAL STRUCTURES DISCUSSION

CEQA: N/A
 Plan Areas: All

Council Districts: All
 Last Day to Act: N/A

PUBLIC HEARING - Not Required

PROJECT AREA: Citywide

IN ATTENDANCE:

Blake Lamb, Principal City Planner, Shana Bonstin, Principal City Planner and Tom Rothmann, Principal City Planner representing the Planning Department.

MOTION:

Commissioner Ambroz requested that staff return to the Commission in March 2018 with an update on the matter. The action was seconded by Commissioner Millman and the vote proceeded as follows:

Moved: Ambroz
 Seconded: Millman
 Ayes: Khorsand, Mitchell, Padilla-Campos, Perlman
 Absent: Choe, Mack, Dake Wilson

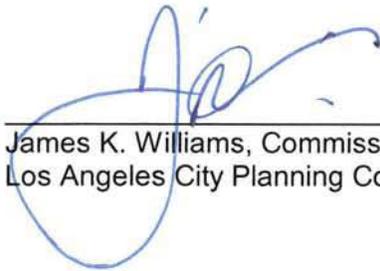
Vote: 6 – 0

MOTION PASSED

There being no further business before the Commission, the meeting adjourned at 12:55 p.m.

 FOR

David Ambroz, President
Los Angeles City Planning Commission



James K. Williams, Commission Executive Assistant II
Los Angeles City Planning Commission

ADOPTED
CITY OF LOS ANGELES

JAN 11 2018

**CITY PLANNING DEPARTMENT
COMMISSION OFFICE**

LOS ANGELES CITY PLANNING COMMISSION
OFFICIAL MINUTES
THURSDAY, JANUARY 11, 2018

LOS ANGELES CITY COUNCIL CHAMBERS
200 NORTH SPRING STREET ROOM 340
LOS ANGELES, CALIFORNIA 90012

THESE MINUTES OF THE LOS ANGELES CITY PLANNING COMMISSION ARE REPORTED IN ACTION FORMAT. COMPLETE DETAILS, INCLUDING THE DISCUSSION, RELATING TO EACH ITEM ARE CONTAINED IN THE AUDIO RECORDING FOR THIS MEETING. RECORDINGS ARE ACCESSIBLE ON THE INTERNET AT <http://planning.lacity.org>. OR MAY BE REQUESTED BY CONTACTING CENTRAL PUBLICATIONS AT (213) 978-1255.

Commission Vice President Renee Dake Wilson called the regular meeting to order at 8:33 a.m. with Commissioners Caroline Choe, Vahid Khorsand, Marc Mitchell, Veronica Padilla-Campos and Dana Perlman in attendance.

Commissioners David Ambroz, John Mack and Samantha Millman were absent.

Also in attendance were Vincent Bertoni, Director of Planning, Kevin Keller, Executive Officer, Lisa Webber, Deputy Planning Director and Amy Brothers, Deputy City Attorney. Commission Office staff present were James K. Williams, Commission Executive Assistant II, Jason Wong, Senior Administrative Clerk and Rocky Wiles, Commission Office Manager.

ITEM NO. 1

DIRECTOR'S REPORT AND COMMISSION BUSINESS

- Director's Report - The Director gave a report related to the Department staffing and hiring. Ken Bernstein Principal City Planner is now overseeing the Urban Design Studio, Claire Bowin, Senior City Planner follows Ken in leaving Citywide Policy and will take a lead role in the Urban Design Studio. Arthi Varma, Principal City Planner has returned to the Department to head the Citywide Policy Section.
- Legal actions and issues update - Deputy City Attorney, Amy Brothers reported on two legal actions taken against the City of Los Angeles. The cases involved the project at 2171 Partridge Avenue and the Caruso Project at 333 La Cienega Boulevard. In both cases, the judge rejected the petitioners' challenges and found that the actions taken by the City were within its authority and according to Code.
- Advance Calendar - There were no changes to the advanced calendar
- Commission Requests - There were no requests by any member of the Commission.
- Minutes of Meeting - Commissioner Perlman moved to approve the Minutes of December 21, 2017 with corrections as stated on the record. The action was seconded by Commissioner Choe and the vote proceeded as follows:

Moved: Perlman
Seconded: Choe
Ayes: Khorsand, Mitchell, Padilla-Campos, Dake Wilson
Absent: Ambroz, Mack, Millman

Vote: 6 – 0

MOTION PASSED

ITEM NO. 2

NEIGHBORHOOD COUNCIL PRESENTATION:

There were no presentations by any Neighborhood Council representative or resolutions submitted to the Commission.

ITEM NO. 3

GENERAL PUBLIC COMMENT:

No speakers requested to address the Commission.

ITEM NO. 4a

RECONSIDERATIONS

There were no requests for reconsideration.

ITEM NO. 5 CONSENT CALENDAR

ITEM NO. 5a

[CPC-2016-4954-DB-SPR](#)

CEQA: ENV-2016-4955-MND

Plan Area: Westlake

Related Case: VTT-74711

Council District: 13 – O’Farrell

Last Day to Act: 1-11-18

PUBLIC HEARING – Completed December 6, 2018

PROJECT SITE: 1800-1850 West Beverly Boulevard, 114-118¾ South Bonnie Brae Street;
101-111 South Burlington Avenue

IN ATTENDANCE:

Oliver Netburn, City Planner, Nicholas Hendricks, Senior City Planner and Charlie Rausch, Acting Chief Zoning Administrator representing the Planning Department; Alex Irvine & Associates, Inc., representing the applicant Mike Schwartzman, CV 1800 Beverly, LLC.

MOTION:

Commissioner Choe put forth the actions below in conjunction with the approval of the following project as recommended in the staff report along with staff’s technical modifications dated January 10, 2018:

Demolition of the existing vacant warehouse, commercial building, 12-unit apartment building, and surface parking and the construction, use and maintenance of a new 79-foot tall, five-story mixed-use development with 243 residential units, of which 21 units or approximately 11 percent, would be designated for Very Low Income Households, and approximately 3,500 square feet of ground level retail and restaurant uses. The project would include 292 vehicle parking spaces and 272 bicycle parking spaces within a two and a half level parking garage.

1. **Find**, based on the independent judgment of the decision-maker, after consideration of the whole of the administrative record, the project was assessed in Mitigated Negative Declaration Case No. ENV-2016-4955-MND, adopted on December 20, 2017; and pursuant to CEQA Guidelines, Sections 15162 and 15164, no subsequent EIR, negative declaration, or addendum is required for approval of the project;
2. **Approve**, pursuant to Los Angeles Municipal Code (LAMC) Section 12.22 A.25 a 33 percent Density Bonus (with 11 percent of the base number of units set aside for Very Low Income Households), and pursuant to AB 744, one half parking space per bedroom for a total of 146 parking spaces;
3. **Approve**, pursuant to LAMC Section 12.22 A.25(f), two (2) On-Menu Incentives as follows:
 - a. Allow up to 20% decrease from the required open space, and
 - b. Allow the averaging of floor area, density, open space and parking over the project site, and permit vehicular access from a less restrictive zone to a more restrictive zone;
4. **Approve**, pursuant LAMC 12.22 A.25(g), one (1) Off-Menu Waiver to allow a 3.19:1 Floor Area Ratio (FAR) in lieu of the approximately 1.83:1 FAR otherwise permitted;
5. **Approve**, pursuant to LAMC Section 16.05, a Site Plan Review for a development which creates or results in an increase of more than 50 dwelling units;

The action was seconded by Commissioner Khorsand and the vote proceeded as follows:

Moved: Choe
 Seconded: Khorsand
 Ayes: Mitchell, Padilla-Campos, Perlman, Dake Wilson
 Absent: Ambroz, Mack, Millman

Vote: 6 – 0

MOTION PASSED

ITEM NO. 6

[CPC-2017-2121-DB](#)
 CEQA: ENV-2017-2122-CE
 Plan Area: Wilshire

Council District: 4 – Ryu
 Last Day to Act: 01-11-18
 Continued from: 11-16-17

Request from the Applicant to the City Planning Commission to extend the time in which to act on the application and to continue the matter to January 25, 2018. (Motion required)

PROJECT SITE: 4749 West Elmwood Avenue

IN ATTENDANCE:

Oliver Netburn, City Planner, Nicholas Hendricks, Senior City Planner and Charlie Rausch, Acting Chief Zoning Administrator representing the Planning Department.

MOTION:

Commissioner Khorsand moved to continue the matter to the City Planning Commission Meeting of February 22, 2018. The action was seconded by Commissioner Mitchell and the vote proceeded as follows:

Moved: Khorsand
 Seconded: Mitchell
 Ayes: Choe, Padilla-Campos, Perlman, Dake Wilson
 Absent: Ambroz, Mack, Millman

Vote: 6 – 0

MOTION PASSED

ITEM NO. 7

CPC-2017-1103-DB

CEQA: ENV-2017-1104-CE
 Plan Area: Northeast Los Angeles

Council District: 14 – Huizar
 Last Day to Act: 01-11-18
 Continued from: 12-14-17

PUBLIC HEARING – Completed September 19, 2017

PROJECT SITE: 1332 West Colorado Boulevard

IN ATTENDANCE:

Azeen Khanmalek, City Planning Associate, Kevin Golden, City Planner and Shana Bonstin, Principal City Planner representing the Planning Department; Heather Lee, representing the applicant; Urita Ramos representing the Office of Councilmember Huizar.

MOTION:

Commissioner Perlman put forth the actions below in conjunction with the approval of the following project as recommended in the staff report along with staff's technical modifications dated January 11, 2018, and including modifications by the Commission as stated on the record:

Construction of a new, approximately 56,000 square foot mixed-use building with 26 residential units, 3,671 square feet of commercial floor area, and a total height of approximately 82 feet.

1. **Determine**, based on the whole of the administrative record that the project is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15332, and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies;
2. **Approve**, pursuant to Section 12.22 A.25(g)(3) of the Los Angeles Municipal Code (LAMC), a 32.5 percent Density Bonus for a project totaling 26 residential dwelling units reserving 10 percent, or two (2) units, for Very Low Income Households, and utilizing parking option 1, with one Off-Menu Incentive to allow a maximum Floor Area Ratio (FAR) of 2.01:1 in lieu of a 1:1, otherwise permitted pursuant to Ordinance No. 173,606 and Section 15.A of the Colorado

- Boulevard Specific Plan;
3. **Adopt** the Conditions of Approval as modified by the Commission, including the technical modifications by staff dated January 11, 2018; and
 4. **Adopt** the Findings.

The action was seconded by Commissioner Khorsand and the vote proceeded as follows:

Moved: Perlman
 Seconded: Khorsand
 Ayes: Choe, Mitchell, Padilla-Campos, Dake Wilson
 Absent: Ambroz, Mack, Millman

Vote : 6 – 0

MOTION PASSED

ITEM NO. 8

CPC-2017-1246-ZC-GPA

CEQA: ENV-2017-1247-ND

Plan Area: Northeast Los Angeles

Council District: 14 - Huizar

Last Day to Act: 03-27-18

PUBLIC HEARING REQUIRED

PROJECT SITE: 2093-2121 East Charlotte Street and 1201-1219 North Cornwell Street

IN ATTENDANCE:

Laura Krawczyk, City Planning Associate, Patricia Diefenderfer, Senior City Planner and Craig Weber, Principal City Planner representing the Planning Department.

MOTION:

Commissioner Dake Wilson put forth the actions below in conjunction with the approval of the following:

Pursuant to Los Angeles Municipal Code (LAMC) Sections 12.32 and 11.5.6, a City-initiated resolution and ordinance to revise the General Plan Land Use designation and zoning for private properties located at 2093-2121 East Charlotte Street and 1201-1219 North Cornwell Street. The proposed action does not include the demolition, remodel, construction, or alteration of existing structures.

1. **Find**, pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including the Negative Declaration, No. ENV-2017-1247-ND, (“Negative Declaration”), and all comments received, there is no substantial evidence that the project will have a significant effect on the environment; **Find** the Negative Declaration reflects the independent judgment and analysis of the City; and **Adopt** the Negative Declaration;
2. **Approve and Recommend** that the City Council **Adopt**, pursuant to City Charter Section 555 and Los Angeles Municipal Code Section 11.5.6, a General Plan Amendment to the

- Northeast Los Angeles Community Plan to change the land use designation from Public Facilities to Medium Residential;
3. **Approve and Recommend** that the City Council **Adopt**, pursuant to Los Angeles Municipal Code Section 12.32, a Zone Change from PF-1 to R3-1;
 4. **Adopt** the Findings.

The action was seconded by Commissioner Khorsand and the vote proceeded as follows:

Moved: Dake Wilson
 Seconded: Choe
 Ayes: Khorsand, Mitchell, Padilla-Campos, Perlman
 Absent: Ambroz, Mack, Millman

Vote: 6 – 0

MOTION PASSED



There being no further business before the Commission, the meeting adjourned at 9:19 a.m.

Renee Dake Wilson, Vice President
Los Angeles City Planning Commission

Vahid Khorsand, Commissioner
Los Angeles City Planning Commission

James K. Williams, Commission Executive Assistant II
Los Angeles City Planning Commission

ADOPTED
CITY OF LOS ANGELES

JAN 25 2018

CITY PLANNING DEPARTMENT
COMMISSION OFFICE

**LOS ANGELES CITY PLANNING COMMISSION
OFFICIAL MINUTES
THURSDAY, JANUARY 25, 2018**

VAN NUYS CITY COUNCIL CHAMBERS
14410 SYLVAN STREET, 2ND FLOOR
VAN NUYS CALIFORNIA 91401

THESE MINUTES OF THE LOS ANGELES CITY PLANNING COMMISSION ARE REPORTED IN ACTION FORMAT. COMPLETE DETAILS, INCLUDING THE DISCUSSION, RELATING TO EACH ITEM ARE CONTAINED IN THE AUDIO RECORDING FOR THIS MEETING. RECORDINGS ARE ACCESSIBLE ON THE INTERNET AT <http://planning.lacity.org>. OR MAY BE REQUESTED BY CONTACTING CENTRAL PUBLICATIONS AT (213) 978-1255.

Commission President David Ambroz called the regular meeting to order at 8:40 a.m. with Commission Vice President Renee Dake Wilson and Commissioners Vahid Khorsand, Marc Mitchell and Veronica Padilla-Campos in attendance.

Commissioners John Mack, Samantha Millman and Dana Perlman were absent.

Commissioner Caroline Choe arrived at 8:51 am.

Also in attendance were Vincent Bertoni, Director of Planning, Kevin Keller, Executive Officer, Lisa Webber, Deputy Planning Director and Donna Wong, Deputy City Attorney. Commission Office staff present were James K. Williams, Commission Executive Assistant II, Jason Wong, Senior Administrative Clerk and Rocky Wiles, Commission Office Manager.

ITEM NO. 1

DIRECTOR'S REPORT AND COMMISSION BUSINESS

- Planning Director Vince Bertoni gave an update on the Small Lot Subdivision Standard Revisions. This item came before the Commission approximately one year ago and went to the Planning and Land Use Management (PLUM) Committee which recommended approval before sending it to the full City Council for review and adoption. Director Bertoni yielded the floor to Deputy Director Lisa Webber who highlighted a few details of the ordinance. She stated that the ordinance would return to the City Planning Commission in March for a final approval.
- Legal actions and issues update: Deputy City Attorney, Donna Wong had no report.
- Advance Calendar: There were no changes to the advanced calendar.
- Commission Requests: There were no requests.
- Minutes of Meeting:
Commissioner Dake Wilson moved to approve the Minutes of January 11, 2018. The action was seconded by Commissioner Padilla-Campos and the vote proceeded as follows:

Moved: Dake Wilson
Seconded: Padilla-Campos
Ayes: Ambroz, Khorsand, Mitchell
Absent: Choe, Mack, Millman, Perlman

Vote: 5 – 0

MOTION PASSED

ITEM NO. 2

NEIGHBORHOOD COUNCIL PRESENTATION:

There were two presentations by Neighborhood Council representatives along with resolutions submitted to the Commission.

ITEM NO. 3

GENERAL PUBLIC COMMENT:

No speakers requested to address the Commission.

ITEM NO. 4

RECONSIDERATIONS

There were no requests for reconsideration.

ITEM NO. 5

CONSENT CALENDAR

There were no consent items.

ITEM NO. 6
CPC-2014-4226-DB-SPR-CDO

CEQA: ENV-2014-4227-MND

Plan Area: Reseda - West Van Nuys

Council District: 3 – Blumenfield

Last Day to Act: 01-25-18

Continued from: 10-26-17

PUBLIC HEARING Completed September 11, 2015 and October 26, 2017**PROJECT SITE:** 6916 North Reseda Boulevard

The Commission considered a request to extend the time to act in which to act on the application and to continue the matter to March 8, 2018.

IN ATTENDANCE:

Courtney Shoenwald, City Planner, Blake Lamb, Principal City Planner representing the Planning Department; Tom Stemnock, Planning Associates, Inc. representing the applicant EMC Capital Group, LLC.

MOTION:

Commissioner Ambroz moved to continue the item to the City Planning Commission Meeting of March 22, 2018. Commissioner Dake Wilson seconded the motion and the vote proceeded as follows:

Moved: Ambroz
 Seconded: Dake Wilson
 Ayes: Khorsand, Mitchell, Padilla-Campos
 Absent: Choe, Mack, Millman, Perlman

Vote: 5 – 0**MOTION PASSED**

Commissioner Choe joined the meeting.

ITEM NO. 7
CPC-2016-2248-GPA-VZC-HD-SP-CU-ZV-WDI

CEQA: ENV-2016-1662-EIR (SCH No. 2016071041)

Plan Area: Encino – Tarzana

Related Case: VTT-74314

Council District: 3 – Blumenfield

Last Day to Act: 01-25-18

PUBLIC HEARING - HELD Completed November 14, 2017**PROJECT SITE:** 18321 West Clark Street;
18365 West Clark Street;
18411 West Clark Street;
18370 West Burbank Boulevard;

18410 West Burbank Boulevard;
18420 West Burbank Boulevard;
APN No. 2160010035

IN ATTENDANCE:

Elva Nuno-O'Donnell, City Planner, Luciralia Ibarra, Senior City Planner and Charlie Rausch, Acting Zoning Administrator representing the Planning Department; Albert Sagulian, representing the Department of Transportation; Cindy Starrett and Beth Gordie, Latham & Watkins LLP representing the applicant Jeremy Stremme, Providence Health System Southern California; Dale Surowitz, Providence Tarzana; David Garfinkle, representing the Tarzana Neighborhood Council; Andrew Pennington, representing the Office of Councilmember Blumenfield.

MOTION:

Commissioner Khorsand put forth the actions below in conjunction with the approval of the following project with modifications to the Conditions of Approval:

Providence Health System-Southern California, the Project Applicant, proposes to renovate and construct new facilities at the Providence Tarzana Medical Center as part of the Providence Tarzana Medical Center Project (Project). The Project will be implemented on the existing Providence Tarzana Medical Center (Project Site) located in the Encino-Tarzana community of the City of Los Angeles. The Project Site comprises approximately 13 acres and is currently improved with four permanent buildings, eight modular buildings, a parking structure, and surface parking areas. The Project proposes upgrades and enhancements to the Hospital on the Project Site, including replacing the Hospital's Main Building (Main Building Replacement), expanding the diagnostic and treatment areas (D&T Expansion), constructing a new central utility plant in the basement of the New Patient Wing, and constructing a new patient wing (New Patient Wing). The Project would also include the construction of a new above-grade, six-level parking structure that would provide approximately 565 parking spaces. To provide for the proposed improvements, the Project would include removal of the existing pharmacy within the Hospital, eight modular buildings, and the MRI Building. The uses in these existing buildings, including the pharmacy, would be relocated within the Hospital. Overall, the Project would remove approximately 37,198 square feet of existing floor area and construct approximately 294,000 square feet of new floor area, resulting in a net increase of approximately 256,802 square feet of net new floor area within the Project Site. The Project would remove 115 existing trees on the Property.

1. **Find**, pursuant to Section 21082.1(c)(3) of the California Public Resources Code, the consideration and certification of the Environmental Impact Report (EIR), ENV-2016-1662-EIR, SCH No. 2016071041, for the above-referenced project, and **adopt** the Statement of Overriding Considerations setting forth the reason and benefits of adopting the EIR with full knowledge that significant impacts may remain; pursuant to Section 21081.6 of the California Public Resources Code, **adopt** the proposed Mitigation Measures and Mitigation Monitoring Program; and pursuant to Section 21081 of the California Public Resources Code, **adopt** of the required findings for the certification of the EIR;
2. **Approve** and **recommend** that the City Council **approve**, pursuant to Section 11.5.6 of the Los Angeles Municipal Code (LAMC), to add a site specific Footnote (No.19) to the Encino-Tarzana Community Plan to read as follows: "Height District 1. The use of this property shall be limited to Height District 1 and as established in the ordinance implementing CPC-2016-2248-GPA-VZC-HD-SP-CU-ZV-WDI;
3. **Approve**, and **recommend** that the City Council **adopt**, pursuant to LAMC Section 11.5.7 G, a Specific Plan Amendment to the Ventura/Cahuenga Boulevard Corridor Specific Plan to exclude the project site from Map 5-Tarzana Section and Pedestrian Oriented Areas;;
4. **Approve**, and **recommend** that the City Council **adopt**, pursuant to LAMC Sections 12.32

- F and 12.32 Q, a Vesting Zone and Height District Change from [Q]C2-1L, C2-1, and P-1 to [T][Q]C2-1;
5. **Approve**, pursuant to LAMC Section 12.24.U.14, a Conditional Use Permit for a Major Development Project that creates 100,000 square feet of floor area in the C2 Zone;
 6. **Approve**, pursuant to Charter Section 562 and LAMC Section 12.27, a Zone Variance from LAMC Sections 14.4.2 and 14.4.8.B for a monument sign with a vertical dimension greater than its horizontal dimension and with a height of more than eight feet above grade, and LAMC Sections 14.4.1 O.A(1) and (2) for a wall sign which exceeds its permitted sign area;
 7. **Dismiss** a Waiver of Dedications and Improvements as no longer necessary pursuant to the Advisory Agency's action of December 5, 2017 for related Case No. VTT-74314;
 8. **Adopt** the Conditions of Approval as modified by the Commission; and
 9. **Adopt** the Findings.

The action was seconded by Commissioner Dake Wilson and the vote proceeded as follows:

Moved: Khorsand
 Seconded: Dake Wilson
 Ayes: Ambroz, Choe, Mitchell, Padilla-Campos
 Absent: Mack, Millman, Perlman

Vote: 6 – 0

MOTION PASSED

Commissioner Ambroz called for a break at 10:01 a.m. The meeting reconvened at 10:07 a.m. with Commissioners Choe, Khorsand, Mitchell, Padilla-Campos and Dake Wilson in attendance.

Commissioner Mitchell recused himself from Item No. 8 and left the meeting.

ITEM NO. 8

CPC-2017-2864-ZC

CEQA: ENV-2017-2865-ND
 ENV-2018-0153-CE

Plan Area: Hollywood and Bel Air – Beverly Crest

Council District: 4 - Ryu
 Last Day to Act: N/A

PUBLIC HEARING – Completed September 27, 2017

PROJECT SITE:

The Project Area consists of the neighborhoods known as “Bird Streets” and “Laurel Canyon” within Council District 4. The Bird Streets neighborhood is generally bounded by Trousdale Estates neighborhood of the City of Beverly Hills to the west, Rising Glen Road / Sunset Plaza Drive to the east, Crescent Drive to the north and the City of West Hollywood to the south. The Laurel Canyon neighborhood is generally bounded by the City of West Hollywood to the south, Mulholland Drive / Woodrow Wilson Drive to the north, Nichols Canyon Road to the east, and Rising Glen Road / Sunset Plaza Drive to the west.

IN ATTENDANCE:

Giselle Corella, City Planning Associate, Christine Saponara, Senior City Planner and Craig Weber, Principal City Planner representing the Planning Department; Julia Duncan representing the Office of Councilmember Ryu.

MOTION:

Commissioner Ambroz put forth the actions below in conjunction with the approval of the following project with technical modifications as stated on the record:

The proposed Zone Change Ordinance establishes a Hillside Construction Regulation (HCR) Supplemental Use District (SUD) that applies specific supplemental development restrictions related to construction, grading quantities, and hauling requirements applicable to the Project Area. The proposed ordinance, by itself, does not authorize or expand any development or construction activities, but instead places development restrictions on construction or hauling practices related to by-right projects in order to reduce the potential impacts from development activities in hillside areas. The regulations would be triggered by application for a building permit for a "project" (defined as the construction, erection, alteration of, or addition to single-family dwelling units located entirely or partially in the Project Area). The Zone Change Ordinance would add the HCR SUD regulations in addition to the base zone (e.g., R1-1-HCR) to restrict the issuance of a building permit for a "project" (as defined above) that is not consistent with the provisions of the HCR SUD. The HCR SUD imposes specific supplemental development restrictions regarding the construction process including: proper identification of hauling vehicles, maximum quantity of allowable grading, and a site plan review process for projects relating to large-scale single-family units in the Project Area.

1. **Determine**, pursuant to CEQA Guidelines Section 15074(b), consideration of the whole of the administrative record, including the Negative Declaration, No. ENV-2017-2865-ND ("Negative Declaration"), and all comments received, that there is no substantial evidence that the project will have a significant effect on the environment; find the Negative Declaration reflects the independent judgment and analysis of the City; and adopt Negative Declaration;
2. **Determine**, pursuant to CEQA Guidelines, Section 15308 (Class 8), an Exemption from CEQA, and that there is no substantial evidence demonstrating that an exception to a Categorical Exemption pursuant to CEQA Guidelines, Section 15300.2 applies; and
3. **Approve** and **recommend** that the City Council **adopt**, pursuant to Section 12.32 F of the Los Angeles Municipal Code (LAMC), a Zone Change Ordinance from those parcels lying within the project boundaries identified in the proposed Ordinance Map from [Q]PF-1XL, [Q]R3-1XL, A1-1XL, C2-1, C4-1D, CR-1D, OS-1XL, PB-1, R1-1, R3-1, R4-1D, RD1.5-1XL, RD6-1, RE11-1, RE15-1, RE15-1-H, RE20-1-H, RE40-1, RE40-1-H, and RE9-1, to [Q]PF-1XL-HCR, [Q]R3-1XL-HCR, A1-1XL-HCR, C2-1-HCR, C4-1D-HCR, CR-1D-HCR, OS-1XL-HCR, PB-1-HCR, R1-1-HCR, R3-1-HCR, R4-1D-HCR, RD1.5-1XL-HCR, RD6-1-HCR, RE11-1-HCR, RE15-1-HCR, RE15-1-H-HCR, RE20-1-H-HCR, RE40-1-HCR, RE40-1-H-HCR, RE9-1-HCR;
4. **Adopt** the staff report as its report on the subject, including staff's Technical Modification dated January 19, 2018; and
5. **Adopt** the Findings.

The action was seconded by Commissioner Dake Wilson and the vote proceeded as follows:

Moved: Ambroz
 Seconded: Dake Wilson
 Ayes: Choe, Khorsand, Padilla-Campos
 Recused: Mitchell
 Absent: Mack, Millman, Perlman

Vote: 5 – 0

MOTION PASSED

Commissioner Mitchell returned to the meeting.

ITEM NO. 9

CPC-2017-1616-ZC

CEQA: ENV-2017-1617-CE

Plan Areas: Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass

Council District: 4 – Ryu

Last Day to Act: 01-25-18

PUBLIC HEARING – Completed December 4, 2017

PROJECT SITE: 4500 North Woodman Avenue;
4464, 4465, 4469, 4470, and 4471 North Ventura Canyon Avenue

IN ATTENDANCE:

Adrineh Melkonian, Planning Assistant, Christine Saponara, Senior City Planner and Blake Lamb, Principal City Planner representing the Planning Department; Julia Duncan representing the Office of Councilmember Ryu.

MOTION:

Commissioner Mitchell put forth the actions below in conjunction with the approval of the following ordinance as recommended in the staff report with technical modifications as stated on the record:

City-initiated ordinance to revise the existing zoning of the project site.

1. **Determine**, pursuant to CEQA Guidelines Section 15332, an Exemption from CEQA, and that there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies;
2. **Approve** and **recommend** that the City Council **adopt**, pursuant to Los Angeles Municipal Code Section 12.32, a Zone Change from R1-1-RIO to R3-1-RIO for the subject site;
3. **Adopt** staff's Technical Modification dated January 24, 2018, to include the Zoning Map, as part of the proposed ordinance; and
4. **Adopt** the Findings.

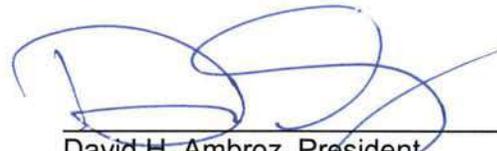
The action was seconded by Commissioner Choe and the vote proceeded as follows:

Moved: Mitchell
Seconded: Choe
Ayes: Ambroz, Khorsand, Padilla-Campos, Dake Wilson
Absent: Mack, Millman, Perlman

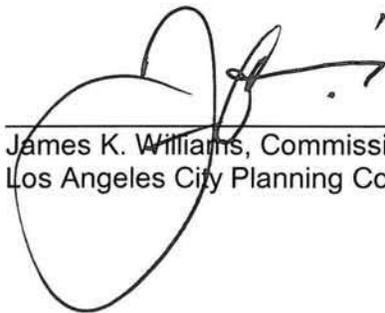
Vote : 6 – 0

MOTION PASSED

There being no further business before the Commission, the meeting adjourned at 10:39 a.m.



David H. Ambroz, President
Los Angeles City Planning Commission



James K. Williams, Commission Executive Assistant II
Los Angeles City Planning Commission

ADOPTED

CITY OF LOS ANGELES

FEB 08 2018

**CITY PLANNING DEPARTMENT
COMMISSION OFFICE**

**CITY PLANNING COMMISSION
REGULAR MEETING AGENDA
THURSDAY, FEBRUARY 8, 2018 after 8:30 a.m.
LOS ANGELES CITY COUNCIL CHAMBER, ROOM 340
200 NORTH SPRING STREET, LOS ANGELES, CALIFORNIA 90012**

David H. Ambroz, President
Renee Dake Wilson, AIA, Vice President
Caroline Choe, Commissioner
Vahid Khorsand, Commissioner
John W. Mack, Commissioner
Samantha Millman, Commissioner
Marc Mitchell, Commissioner
Veronica Padilla-Campos, Commissioner
Dana Perlman, Commissioner

Vincent P. Bertoni, AICP, Director
Kevin J. Keller, AICP, Executive Officer
Lisa M. Webber, AICP, Deputy Director

James K. Williams, Commission Executive Assistant II
cpc@lacity.org
(213) 978-1295

POLICY FOR DESIGNATED PUBLIC HEARING ITEMS

Pursuant to the Commission's general operating procedures, the Commission at times must necessarily limit the speaking times of those presenting testimony on either side of an issue that is designated as a public hearing item. In all instances, however, equal time is allowed for presentation of pros and cons of matters to be acted upon. All requests to address the Commission on public hearing items must be submitted prior to the Commission's consideration of the item. **EVERY PERSON WISHING TO ADDRESS THE COMMISSION MUST COMPLETE A SPEAKER'S REQUEST FORM AND SUBMIT IT TO THE COMMISSION STAFF.**

Written submissions are governed by Rule 4.3 of the Los Angeles City Planning Commission Rules and Operating Procedures which is posted online at https://planning.lacity.org/CPC_PoliciesAndAdvisoryNotices.html. All submissions within 48 hours of the meeting, including the day of meeting are limited to 2 pages plus accompanying photographs. 20 hard copies must be submitted the day of the meeting. Submissions that do not comply with these rules will be stamped "File Copy. Non-Complying Submission." Non-complying submissions will be placed into the official case file, but they will not be delivered to or considered by the CPC, and will not be included in the official administrative record for the item at issue.

The Commission may ADJOURN FOR LUNCH at approximately 12:00 Noon. Any cases not acted upon during the morning session will be considered after lunch.

The Commission may RECONSIDER and alter its action taken on items listed herein at any time during this meeting or during the next regular meeting, in accordance with the Commission Rules and Operating Procedures and provided that the Commission retains jurisdiction over the case. **In the case of a Commission meeting cancellation, all items shall be continued to the next regular meeting date or beyond, as long as the continuance is within the legal time limits of the case or cases.**

Sign language, interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request no later than **7 days** prior to the meeting by calling the Commission Executive Assistant at (213) 978-1300 or by e-mail at CPC@lacity.org.

If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agenzized here, or in written correspondence on these matters delivered to this agency at or prior to the public hearing.

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

AGENDAS are posted for public review in the Main Street lobby of City Hall East, 200 N. Main Street, Los Angeles. Commission meetings may be heard on Council Phone by dialing (213) 621-2489 or (818) 904-9450.

Agendas, Draft and Adopted Minutes are available on line at <http://planning.lacity.org>, by selecting "Commissions & Hearings", "City Planning Commission", "Agendas" under the specific meeting date. The Draft Minutes under Item 1 will also be available on the day of the meeting. Meeting Minutes are available to the public at the Commission Office, 200 North Spring Street, Room 532, Los Angeles, from 8:00 a.m. to 4:00 p.m. Monday through Friday.

1. **DIRECTOR'S REPORT AND COMMISSION BUSINESS**

- Update on City Planning Commission Status Reports and Active Assignments
- Legal actions and issues update
- Other Items of Interest
- Advance Calendar
- Commission Requests
- Meeting Minutes – January 25, 2018

2. **NEIGHBORHOOD COUNCIL PRESENTATION**

Presentation by Neighborhood Council representatives on any Neighborhood Council resolution, or community impact statement filed with the City Clerk, which relates to any agenda item listed or being considered on this agenda. The Neighborhood Council representative shall provide the Board or Commission with a copy of the Neighborhood Council's resolution or community impact statement. THESE PRESENTATIONS WILL BE TAKEN AT THE TIME THE AGENDA ITEM IS CALLED FOR CONSIDERATION.

3. **GENERAL PUBLIC COMMENT**

The Commission shall provide an opportunity in open meetings for the public to address it **on non-agenda items**, for a cumulative total of up to thirty (30) minutes, on items of interest to the public that are within the subject matter jurisdiction of the Commission.

PERSONS WISHING TO SPEAK MUST SUBMIT A SPEAKER'S REQUEST FORM. ALL REQUESTS TO ADDRESS THE COMMISSION ON NON-AGENDA ITEMS AND ITEMS OF INTEREST TO THE PUBLIC THAT ARE WITHIN THE JURISDICTION OF THE COMMISSION MUST BE SUBMITTED PRIOR TO THE COMMENCEMENT OF THE PUBLIC COMMENT PERIOD.

4. **RECONSIDERATIONS**

- a. **MOTIONS TO RECONSIDER** - The Commission may make a motion to reconsider a Commission Action on any agenda items from its previous meeting, consistently with the Commission Rule 8.3, provided the Commission retains jurisdiction over the matter.
- b. **MERITS OF ANY ITEM THE COMMISSION HAS VOTED TO RECONSIDER** – If a majority of the Commission has approved a motion to reconsider a Commission Action, the Commission may address the merits of the original Commission Action.

5. **CONSENT CALENDAR** *(No Items)*

Consent Calendar items are considered to be not controversial and will be treated as one agenda item. The Consent Calendar will be enacted by one motion. There will be no separate discussion of these items unless the item is removed from the Consent Calendar, in which event the item will be considered as time allows on the regular agenda.

6. [CPC-2016-3841-ZV-CU-CUB-SPR](#)
CEQA: ENV-2015-3167-MND-REC1
Plan Area: Hollywood
Related Case: DIR-2015-3166-SPR

Council District: 13 – O’Farrell
Last Day to Act: 02-08-18

PUBLIC HEARING – Completed December 5, 2017

PROJECT SITE: 1400 North Cahuenga Boulevard;
1414 North Cahuenga Boulevard; 6407, 6413 De Longpre Avenue;
1403, 1405, 1408, 1413 Ivar Avenue

PROPOSED PROJECT:

Construction, use, and maintenance of an eight-story (seven-story plus mezzanine), approximately 94-foot in height, 74,362 square-foot, 220 room boutique hotel (“The Godfrey”). The hotel will include a 2,723 square-foot ground floor restaurant, a third floor courtyard, and rooftop lounge with 1,440 square feet of floor area with a total of 476 seats (133 on the ground floor, 66 in the courtyard, and 277 seats on the rooftop). The project will include 104 on-site automobile parking spaces within three levels of subterranean parking and 94 bicycle parking spaces.

REQUESTED ACTIONS:

1. Based on the independent judgement of the decision-maker, after consideration of the whole of the administrative record, that the project was assessed in Mitigated Negative Declaration, No. ENV-2015-3167-MND adopted on June 16, 2016; and pursuant to CEQA Guidelines 15162 and 15164, as supported by the Addendum dated November 9, 2017, no major revisions are required to the Mitigated Declaration, and no subsequent EIR or negative declaration is required for approval of the project;
2. Pursuant to Los Angeles Municipal Code (LAMC) Section 12.27, a Zone Variance to permit rooftop dining above the ground floor in the C4 Zone;
3. Pursuant to LAMC Section 12.24 U, a Conditional Use to permit an increase in Floor Area Ratio (FAR) beyond the currently permitted 3:1 as established by the “D” Limitation under Ordinance No. 165,661, up to a maximum FAR of 3.69:1;
4. Pursuant to LAMC Section 12.24 W.1, a Conditional Use to permit the sale and dispensing of a full line of alcoholic beverages for on-site consumption in conjunction with a proposed hotel with on-site restaurants and bars; and
5. Pursuant to LAMC Section 16.05, Site Plan Review for a development that creates 50 or more guest rooms.

Applicant: 1400 Cahuenga JV, LLC; Oxford Hollywood, LLC
Representative: Dana Sayles, Three6ixty

Staff: JoJo Pewsawang, City Planner
jojo.pewsawang@lacity.org
(213) 978-1214

7. [CPC-2017-1014-CU-ZAA-ZAD-SPR](#)
CEQA: ENV-2017-1015-MND
Plan Area: Harbor Gateway

Council District: 15 – Buscaino
Last Day to Act: 02-08-18

PUBLIC HEARING – Completed December 20, 2017

PROJECT SITE: 15116-15216 South Vermont Avenue;
747-761 West Redondo Beach Boulevard

PROPOSED PROJECT:

Construction, use and maintenance of a one-story (with a 25,000 square-foot mezzanine), 54-foot tall, 341,402 square-foot warehouse/manufacturing/high-cube warehouse/distribution center with a total of 233 automobile parking spaces and 32 bicycle parking spaces. The project also includes 36 dock high truck loading positions and parking for up to 71 trailers.

REQUESTED ACTIONS:

1. Pursuant to CEQA Guidelines Section 15074(b), consideration of the whole of the administrative record, including the Mitigated Negative Declaration No. ENV-2017-1015-MND (“Mitigated Negative Declaration”), all comments received, the imposition of mitigation measures and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;
2. Pursuant to Los Angeles Municipal Code (LAMC) Section 12.24 U.14, a Conditional Use Permit for a development which creates 250,000 square feet or more of warehouse floor area;
3. Pursuant to LAMC Section 12.24 W.27, a Conditional Use Permit to allow:
 - a. Less than 50 percent glazing; and
 - b. 24-hour operation in lieu of the otherwise permitted 7:00 a.m. to 11:00 p.m.
4. Pursuant to LAMC Section 12.28 A, a Zoning Administrator’s Adjustments from LAMC 12.21.1 A, to allow a maximum building height of 54 feet in lieu of the otherwise 45 feet; and
5. Pursuant to LAMC Section 16.05, Site Plan Review for a development which creates or results in an increase of more than 50,000 square feet of non-residential floor area.

Applicant: Prologis, LP
Representative: Armen Ross, The Ross Group

Staff: Oliver Netburn, City Planner
oliver.netburn@lacity.org
(213) 978-1382

8. [CPC-2016-4962-VZC-HD-MCUP-ZV-SPR](#)
CEQA: ENV-2016-4963-CE
Plan Area: Central City

Council District: 14 – Huizar
Last Day to Act: 03-27-18

PUBLIC HEARING REQUIRED

PROJECT SITE: 755 South Los Angeles Street;
751 – 761 South Los Angeles Street

PROPOSED PROJECT:

Improvements to an existing 79,793 square-foot light manufacturing building with a 15,879 square-foot basement currently used for storage. The improvements would include a change of use from clothing manufacturing, retail, accessory office, and storage uses to office, food hall/restaurant, and storage uses; and a 9,541 square-foot rooftop restaurant addition, resulting in a net floor area increase of 6,856 square feet and a total floor area of 86,649 square feet. The Project Site has a lot area of approximately 18,024 square feet, and the Project would have a Floor Area Ratio (FAR) of approximately 4.9:1. The floor area will be distributed as follows: 59,292 square feet of general and/or

creative office space on floors two through five; and nine restaurants totaling 27,357 square feet, including an eight-tenant food hall with outdoor dining on the ground floor/mezzanine and basement, and one rooftop restaurant with outdoor dining. Four automobile parking spaces would be provided off-site, and 12 bicycle parking spaces would be provided on-site (four short-term and eight long-term).

REQUESTED ACTIONS:

1. Pursuant to CEQA Guidelines, Section 15300 an Exemption from CEQA, Article III, Section 1, Classes 1 and 32, and that there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies;
2. Pursuant to Los Angeles Municipal Code (LAMC) Sections 12.32 Q and F, a Vesting Zone Change and Height District Change from M2-2D to M2-2D to amend the Development “D” Limitation to permit a 4.9:1 FAR in lieu of the existing D Limitation of a 3:1 FAR;
3. Pursuant to LAMC Section 12.24 W.1, a Master Conditional Use Permit to allow the sale of a full line of alcoholic beverages for on-site consumption, in conjunction with nine restaurants totaling 27,357 square feet and 1,152 seats; and pursuant to LAMC Section 12.24 S, a 20 percent reduction in the number of required parking spaces;
4. Pursuant to LAMC Section 12.27, a Variance from LAMC Section 12.26 E.5 to provide automobile parking spaces off-site within 750 feet by lease in lieu of recorded covenant; and
5. Pursuant to LAMC Section 16.05, Site Plan Review for a change of use that results in an increase of 1,000 or more average daily trips.

Applicant: 755 South Los Angeles Street, LLC
Representative: Stephen Kia, Urban Concepts

Staff: Michael Sin, City Planning Associate
michael.sin@lacity.org
(213) 978-1345

9. [VTT-74169-1A](#)
CEQA: ENV-2016-1955-MND
Plan Area: Hollywood
Related Case: CPC-2016-1954-CU-MCUP-DB-SPR-SPP

Council District: 13 – O’Farrell
Last Day to Act: 02-08-18

PUBLIC HEARING REQUIRED

PROJECT SITE: 1860, 1868 North Western Avenue;
5440, 5446, 5448 West Franklin Avenue

PROPOSED PROJECT:

Demolition of a gas station, a one-story single-family residence and a one-story duplex and the construction of a 97,334-square-foot, 60-foot, five-story mixed use project that includes 87 residential units and approximately 6,000 square feet of ground floor commercial. Of the 87 units, 20 percent or 11 units will be set aside as Restricted Affordable Units for Very Low Income Households. The project provides a total of 112 parking spaces located on the ground level and in one subterranean parking level. The project is located in the C4-1D and R3-1 Zones within Subareas A (Neighborhood Conservation) and B (Mixed Use Boulevards) of the Vermont/Western Station Neighborhood Area Plan (SNAP) Transit Oriented District Specific Plan.

APPEAL:

Appeal of the Deputy Advisory Agency’s determination to approve a Vesting Tentative Tract Map to allow the merger and re-subdivision of the project site into a single ground lot and the merger of 4.5 feet of previously dedicated area along Franklin Avenue back into the project site and approval of a haul route; and appeal of the Mitigated Negative Declaration ENV-2016-1955-MND, mitigation measures and the Mitigation Monitoring Program for the project.

Applicant: Damon Porter, Western & Franklin, LLC
Representative: Craig Lawson, Craig Lawson & Company, LLC

Appellants: Ronald Ostrow; Mark Mauceri; Christina Khanjian; Gary Khanjian; Nuel Tate; Nyla Arslanian; Karen De La Carriere; Jeffrey Augustine; George Abrahams and Alexandra Kondrake; William and Rebecca Beech; Drew Murphy (Franklin & Western Improvement Association)
(11 Appellants)

Staff: Monique Acosta, City Planning Associate
monique.acosta@lacity.org
(213) 978-1173

10. **CPC-2016-1954-CU-MCUP-DB-SPP-SPR**

CEQA: ENV-2016-1955-MND
Plan Area: Hollywood
Related Case: VTT-74169-1A

Council District: 13 – O’Farrell
Last Day to Act: 02-28-18

PUBLIC HEARING - Completed March 23, 2017

PROJECT SITE: 1860, 1868 North Western Avenue;
5440, 5446, 5448 West Franklin Avenue

PROPOSED PROJECT:

Proposed Project involves the demolition of a gas station, a one-story single-family residence and a one-story duplex; and the construction of a 97,334 square-foot, five-story mixed use project that includes 87 residential units and approximately 6,000 square feet of commercial ground floor area, measuring 60 feet in height. Of the 87 units, 20 percent or 11 units will be set aside as Restricted Affordable Units for Very Low Income Households. The project provides a total of 112 parking spaces located on the ground level and in one subterranean parking level. The project is located in the C4-1D and R3-1 Zones within Subareas A (Neighborhood Conservation) and B (Mixed Use Boulevards) of the Vermont/Western Station Neighborhood Area Plan (SNAP) Transit Oriented District Specific Plan.

REQUESTED ACTIONS:

1. Pursuant to CEQA Guidelines Section 15074(b), consideration of the whole of the administrative record, including the Mitigated Negative Declaration, No. ENV-2016-1955-MND (“Mitigated Negative Declaration”), Errata 1 dated March 23, 2017, Errata 2 dated January 16, 2018, and all comments received, the imposition of mitigation measures and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;
2. Pursuant to Los Angeles Municipal Code (LAMC) 12.24 U.26 a Conditional Use to increase the density greater than the maximum permitted in LAMC Section 12.22 A.25, to 57.5 percent over the entire Project Site in order to permit 87 dwelling units, in lieu of 55 dwelling units;
3. Pursuant to LAMC Section 12.24 W.1, a Master Conditional Use to the sale and/or dispensing of a full-line of alcoholic beverages for on-site and off-site consumption for a maximum of three (3) commercial establishments within 6,000 square feet of commercial floor area;
4. Pursuant to LAMC 12.22 A.25(g)(2), the Applicant proposes to set aside 11 units, or 20 percent of the dwelling units as Restricted Affordable Units and requests the following two (2) On-Menu Incentives:
 - a. A 3:1 Floor Area Ratio (FAR) over the entire Project Site, in lieu of the permitted 1:1 FAR in the C4-1D zoned portion of Subarea A and the 2:1 FAR for a Mixed-Use Project in Subarea B; and
 - b. Averaging floor area ratio, density, parking, open space and permitting vehicular access within the C4-1D and R3-1 Zones and Subareas A and B.

5. Pursuant to LAMC Section 12.22 A.25(g)(3), the Applicant requests the following four (4) Off-Menu Incentives from the Vermont/Western SNAP Specific Plan:
 - a. From Section 7.A of the Vermont/Western SNAP Specific Plan to allow seven (7) lots having a combined lot area of 38,276 square feet to be tied together to form a single building site, in lieu of a maximum of two (2) lots having a combined lot area of 15,000 square feet to be tied together to form a single building site for residentially zoned properties in Subarea A;
 - b. From Section 7.B of the Vermont/Western SNAP Specific Plan to allow seven (7) lots having a combined lot area of 38,276 square feet to be tied together to form a single building site, in lieu of a maximum of two (2) lots having a combined lot area of 10,000 square feet to be tied together to form a single building site for commercially zoned properties in Subarea A;
 - c. From Section 8.B.1 of the Vermont/Western SNAP to permit an increase in building height of 60 feet over the entire Project Site, in lieu of the maximum permitted building height of 50 feet for a Mixed-Use Project in Subarea B; and
 - d. From the Vermont/Western SNAP Specific Plan to permit an increase in transitional height over the entire Project Site:
 - i. From Section 7.D of the Vermont/Western SNAP Specific Plan for an increase in height of 16 feet, 2 inches, thereby allowing 60 feet in transitional height, in lieu of 15 feet above the shortest adjacent building or 43 feet ten inches in Subarea A; and
 - ii. From Section 8.C of the Vermont/Western SNAP Specific Plan for an increase in height of 35 feet, thereby allowing 60 feet in transitional height, in lieu of 25 feet required for buildings located within a distance of 0 to 49 feet from an abutting lot in Subarea A; and to permit an increase in height of 27 feet, thereby allowing 60 feet in transitional height, in lieu of 33 feet required for buildings located within a distance of 50 to 99 feet from an abutting lot in Subarea A.
6. Pursuant to LAMC Section 11.5.7, a Project Permit Compliance Review with the Vermont/Western Station Neighborhood Area Plan (SNAP) Transit Oriented District Specific Plan; and
7. Pursuant to LAMC Section 16.05, a Site Plan Review for a project which creates, or results in an increase of 50 or more dwelling units.

Applicant: Damon Porter, Western & Franklin, LLC
 Representative: Craig Lawson, Craig Lawson & Company, LLC

Staff: Mindy Nguyen, City Planner
mindy.nguyen@lacity.org
 (213) 978-1241

11. [CPC-2014-4942-ZC-HD-DB-SPR-WDI](#)

CEQA: ENV-2014-4943-MND
 Plan Area: Wilshire

Council District: 1 - Cedillo
 Last Day to Act: 02-08-18
 Continued from: 12-14-17

PUBLIC HEARING – Completed July 24, 2017

PROJECT SITE: 2501 – 2515 West Olympic Boulevard;
 980 – 992 South Arapahoe Street;
 981 South Hoover Street

PROPOSED PROJECT:

Construction of a new seven-story, mixed-use development consisting of 173 residential units and 34,065 square feet of commercial uses with a total of 262 on-site vehicle parking spaces (201 spaces for residential uses, 61 spaces for commercial uses) located within one ground floor parking level and two

subterranean parking levels, on a Project Site that consists of nine (9) contiguous lots totaling 51,949 square feet in size, and is currently vacant. The building will measure approximately 90 feet in height and contain approximately 183,190 square feet of floor area. As part of this application, the Department of City Planning has initiated a Zone Change and Height District Change from C2-2 to (T)(Q)C2-1 as a technical correction to a recorded mapping error which will create consistency between the Zone designation and the General Plan Land Use designation for the C2 zoned lots.

REQUESTED ACTIONS:

1. Pursuant to CEQA Guidelines Section 15074(b), consideration of the whole of the administrative record, including the Mitigated Negative Declaration, No. ENV-2014-4943-MND (“Mitigated Negative Declaration”), Errata dated November 17, 2017, all comments received, the imposition of mitigation measures and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;
2. Pursuant to Los Angeles Municipal Code (LAMC) Section 12.32 F, a Zone Change and Height District Change from C2-2 to (T)(Q)C2-1;
3. Pursuant to LAMC Section 12.22 A.25(g)(2) a 33 percent Density Bonus for a project reserving 15 percent of the base dwelling units, or 20 units, for Very Low Income Households, in conjunction with Parking Option 1 and the following three (3) On-Menu Incentives:
 - a. Averaging of floor area, density, open space and parking over the Project Site, and to permit vehicular access from a less restrictive zone to a more restrictive zone;
 - b. Seventeen percent reduction in the required depth of the front yard setback along Arapahoe Street, for a 12-foot, 6-inch setback in lieu of the otherwise required 15-foot setback; and
 - c. Twenty percent maximum reduction in the required width of the northerly side yard, for an 8-foot setback in lieu of the otherwise required 10-foot setback.
4. Pursuant to LAMC Section 12.22 A.25(g)(3), an Off-Menu Waiver to allow a 3.90:1 Floor Area Ratio (FAR) for the entire Project Site, in lieu of the otherwise maximum permitted 3:1 FAR for the R4-1 Zone and 1.5:1 FAR for the proposed (T)(Q)C2-1 Zone; and
5. Pursuant to LAMC Section 16.05, Site Plan Review approval for a development project that results in an increase of 50 or more residential units.

Applicant: Shahin Simon Neman, NY Properties, LLC
Representative: James Santa Maria, Santa Maria Group

Staff: Mindy Nguyen, City Planner
mindy.nguyen@lacity.org
(213) 978-1241

12. [CPC-2014-2906-TDR-SPR](#)
CEQA: ENV-2014-2907-MND
Plan Area: Central City
Related Case: VTT-69839-CN

Council District: 14 – Huizar
Last Day to Act: 2-8-18
Continued from 12-14-17

Request from the Applicant to the City Planning Commission to extend the time in which to act on the application and to continue the matter to February 22, 2018. (Motion required)

PUBLIC HEARING – Completed January 26, 2017

PROJECT SITE: 601 South Main Street;
601 – 641 South Main Street;
108 – 114 West 6th Street

PROPOSED PROJECT:

The demolition of an existing surface parking lot, and the construction of a new 38-story, 390-foot, 3-inch tall, mixed-use, high-rise development consisting of 452 residential condominium units and 15 commercial condominium units with 21,514 square feet of commercial space. The project would provide 860 parking spaces within one subterranean level, and six above-grade parking levels.

REQUESTED ACTIONS:

1. Pursuant to CEQA Guidelines Section 15074(b), consideration of the whole of the administrative record, including the Mitigated Negative Declaration, No. ENV-2014-2907-MND (“Mitigated Negative Declaration”), all comments received, the imposition of mitigation measures and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;
2. Pursuant to Section 14.5.6 of the Los Angeles Municipal Code (LAMC), Transfer of Floor Area Rights (TFAR) from the Los Angeles Convention Center (Donor Site) at 1201 South Figueroa Street for the approximate amount of 186,435 square feet, to the project site (Receiver Site) permitting an FAR of 9.1:1 and 551,349 square feet of floor area in lieu of a 6:1 FAR which permits 364,914 square feet of floor area; and
3. Pursuant to LAMC Section 16.05, a Site Plan Review for a project which results in 50 or more residential units.

Applicant: Barry Shy, Sixth and Main, LLC
Representative: Kate Bartolo & Associates

Staff: May Sirinopwongsagon, City Planner
may.sirinopwongsagon@lacity.org
(213) 978-1372

13. [CPC-2017-4556-ZC](#)
CEQA: ENV-2016-2111-ND-REC1
Plan Area: Wilshire

Council District: 4 – Ryu
Last Day to Act: N/A

PUBLIC HEARING – Completed December 19, 2017

PROJECT SITE:

The area consists of the Brookside and Sycamore Square neighborhoods within Council District 4 as shown in the proposed Ordinance Maps. The Brookside area is generally bound by Wilshire Boulevard, Highland Avenue, Olympic Boulevard, and Muirfield Road. The Sycamore Square neighborhood generally consists of properties along Citrus Avenue and Orange Drive in between Wilshire Boulevard and Olympic Boulevard.

PROPOSED ORDINANCE:

As follow-up to Interim Control Ordinance number 184,381, the proposed Zone Change Ordinances will provide more specialized development regulations for single-family dwelling units within the project boundaries identified in the attached proposal utilizing the new “R1 One-Family Variation Zones.” The new zones represent context sensitive zoning meant to preserve the neighborhood character of the individual communities.

REQUESTED ACTIONS:

1. Find that, after consideration of the whole of the administrative record, the project was assessed in Negative Declaration, No. ENV-2016-2111-ND; and pursuant to CEQA Guidelines 15162 and 15164, as supported by the addendum Negative Declaration No. ENV-2016-2111-ND-REC-1 dated January 2018, no major revisions are required to the Negative Declaration; and no subsequent EIR or Negative Declaration is required for approval of the project;
2. Pursuant to Section 12.32 F of the Los Angeles Municipal Code (LAMC) a Zone Change

Ordinance changing those parcels lying within the proposed Brookside Ordinance Map from R1-1 to R1R3-RG and R1V3-RG; and

3. Pursuant to LAMC Section 12.32 F a Zone Change Ordinance changing those parcels lying within the proposed Sycamore Square Ordinance Map from R1-1 to R1V3-RG.

Applicant: City of Los Angeles

Staff: Giselle Corella, City Planning Associate
giselle.corella@lacity.org
(213) 978-1357

14. **CPC-2017-2533-ZC**
CEQA: ENV-2017-2534-ND
ENV-2018-224-CE

Council District: 4 – Ryu
Last Day to Act: N/A

Plan Area: Wilshire

PUBLIC HEARING – Completed December 11, 2017

PROJECT SITE:

Seventeen lots zoned [Q]C2-1 and located on South Sycamore Avenue between 4th Street to the north and 6th Street to the south, and located on South Sycamore Avenue, South Orange Drive, and South Citrus Avenue between 6th Street to the north and Carling Way to the south. Lots 37, 279, 280, 283, 284, 361, 362, 337, 338, 339, 340, 341, 342, 343, 344, 345, and 346 in Tract No. 5049, Map Book 54-52, County of Los Angeles.

PROPOSED ORDINANCE:

A Zone Change Ordinance to remove the existing [Q] Condition on the subject properties and replace it with a new [Q] Condition that would limit use of the subject properties to residential development that conforms to the allowable density and development provisions of the R1R3-RG One-Family Rear-Mass Variation Zone and Rear Detached Garage Supplemental Use District, or surface parking areas. The proposed ordinance implements context-sensitive zoning meant to preserve neighborhood character and does not, by itself, propose or authorize any development.

REQUESTED ACTIONS:

1. Pursuant to CEQA Guidelines, Section 15300 after consideration of the whole of the administrative record, the Project is exempt from CEQA pursuant to CEQA Guidelines Section 15305 and Section 15308 and City of Los Angeles Environmental Quality Act Guidelines, Article III, 1(e)(12), and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines Section 15300.2 applies;
2. Pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including the Negative Declaration No. ENV-2017-2534-ND (“Negative Declaration”), and all comments received, there is no substantial evidence that the project will have a significant effect on the environment; Find the negative declaration reflects the independent judgment and analysis of the City; and Adopt the negative declaration; and
3. Pursuant to Section 12.32 F of the Los Angeles Municipal Code, a Zone Change Ordinance establishing a Zone Change to those parcels lying within the project boundaries identified in the proposed Ordinance Map from [Q]C2-1 to [Q]C2-1, changing the text of the [Q] Condition.

Applicant: City of Los Angeles

Staff: Emily Gable, Planning Assistant
emily.gable@lacity.org
(213) 978-1342

The next scheduled regular meeting of the City Planning Commission will be held on:

Thursday, February 22, 2018

Van Nuys City Hall
Council Chamber, 2nd Floor
14410 Sylvan Street
Van Nuys, CA 91401

An Equal Employment Opportunity/Affirmative Action Employer

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate. The meeting facility and its parking are wheelchair accessible. Translation services, sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services must be requested **7 days prior to the meeting** by calling the Planning Commission Secretariat at (213) 978-1300 or by email at CPC@lacity.org.

Appendices – Channel Law Letter

February 12, 2018

Comments On The Environmental Documentation For, And The, Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd (APN 4238-024-900 To 911)

APPENDIX C

Notice of Intent to Adopt the MND (dated 1/8/2018)

1202 DEPARTMENT OF
CITY PLANNING

CITY PLANNING COMMISSION

DAVID H. J. AMBROZ
PRESIDENT

RENEE DAKE WILSON
VICE-PRESIDENT

CAROLINE CHOE
VAHID KHORSAND
JOHN W. MACK
SAMANTHA MILLMAN
MARC MITCHELL
VERONICA PADILLA-CAMPOS
DANA M. PERLMAN

ROCKY WILES
COMMISSION OFFICE MANAGER
(213) 978-1300

CITY OF LOS ANGELES
CALIFORNIA



ERIC GARCETTI
MAYOR

EXECUTIVE OFFICES
200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801

VINCENT P. BERTONI, AICP
DIRECTOR
(213) 978-1271

KEVIN J. KELLER, AICP
EXECUTIVE OFFICER
(213) 978-1272

LISA M. WEBBER, AICP
DEPUTY DIRECTOR
(213) 978-1274

<http://planning.lacity.org>

**NOTICE OF INTENT TO ADOPT
A MITIGATED NEGATIVE DECLARATION**

Public Resources Code Section 21092 and Cal. Code of Regulations Title 14, Section 15072 (the Guidelines for the California Environmental Quality Act) require a local agency to provide a notice of intent to adopt a negative declaration or mitigated negative declaration to the public, responsible agencies, trustee agencies, and the county clerk of each county within which the proposed project is located, sufficiently prior to adoption by the lead agency of the negative declaration or mitigated negative declaration to allow the public and agencies the review period provided under Section 15105 of the Guidelines.

Project Title: Permanent Supportive Housing Ordinance
CPC-2017-3136-CA
ENV-2017-3137-MND

Project Location: Citywide

Pursuant to CEQA Guidelines Section 15072(g)(5), the mitigated negative declaration (MND) does not identify any particular site on any of the lists enumerated under Government Code Section 65962.5, including lists of hazardous waste facilities, land designated as hazardous waste property, and hazardous waste disposal sites, and the information in the Hazardous Waste and Substances Statement required under subdivision (f) of that section. Please see the MND for discussion of the potential for future development under the project to be on a list described in Gov't Code Section 65962.5.

Project Description: An ordinance amending Sections 12.03, 12.04.09, 14.00 and 16.05 of the Los Angeles Municipal Code establishing regulations to facilitate the production of Permanent Supportive Housing, including adopting regulations that define PSH & project eligibility criteria, establish unique development standards for PSH, and facilitate administrative review & approval, as well as modify certain provisions related to height & density, consistent with State Density Bonus Law. The PSH Ordinance would allow for projects to select concessions with respect to Zoning Code, including up to 20% decrease in required setbacks, up to 20% reduction in required open space, up to 20% increase in lot coverage limits, up to 35% increase in FAR and depending on the height district up to a 35% increase in height or one additional story. Additional design requirements include that when adjacent to or across an alley

from an R2 or more restrictive zone, the building's transitional height shall be stepped-back within a 45-degree angle.

Schedule: The City of Los Angeles will receive comments on the proposed mitigated negative declaration beginning January 11, 2018 for 30 days, ending February 12, 2018. The City Council of the City of Los Angeles, as lead agency, will make a determination on the project, following a public hearing to be scheduled. A future public hearing by the Planning and Land Use Management (PLUM) City Council Committee will be scheduled. PLUM Agendas may be found online at <https://www.lacity.org/city-government/calendar>.

Copies of the proposed mitigated negative declaration and all documents referenced in the proposed mitigated negative declaration are available for review during the lead agency's normal business hours at: City of Los Angeles Planning Department, Environmental Review Section, 200 North Spring Street, Room 750, Los Angeles, California 90012. Documents are also available online at the Department of City Planning's website <http://planning.lacity.org/>.

Signature: _____



Date: _____

1/8/2018

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Jamie T. Hall
Channel Law Group, LLP
8200 Wilshire Blvd., Ste 300
Beverly Hills, CA 90211

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Appendices – Channel Law Letter

February 12, 2018

Comments On The Environmental Documentation For, And The, Permanent Supportive Housing Ordinance (CPC-2017-3136-CA; ENV-2017-3137) And Proposed Redevelopment Of Venice Dell Pacific Site Located At 125 E. Venice Blvd (APN 4238-024-900 To 911)

APPENDIX D

**Los Angeles Times Article: A Plan to House L.A.'s Homeless Residents
Could Transform Parking Lots Across The City**

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A plan to house L.A.'s homeless residents could transform parking lots across the city



By DOUG SMITH FEB 09, 2018 | 3:00 AM



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Vietnam veteran Frank Costa lives in a pedestrian tunnel underneath Parking Lot 731 in Venice. Two non-profits, Venice Community Housing and Hollywood Community Housing Corp., have been selected to develop the lot, with plans for 140 housing units. (Genaro Molina / Los Angeles Times)



In the decades following World War II, when the suburbs were young and the car was king, Los Angeles went on a land-buying spree.

The city bought parcels in every size and shape, demolished any buildings on them and opened parking lots to serve emerging commercial districts.

By the 1970s the buying had mostly stopped, and today these 119 public lots blend into the urban quilt all but indistinguishable from their free-market competitors.

But now the city is cultivating plans that could transform much of that land again, this time from asphalt to multistory apartment buildings to house chronically homeless people.



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Plans are already underway to develop housing on large public lots in Venice and Hollywood, while officials review the rest to determine which could support housing.

Advocates of the conversion see it as more than a solution to homelessness.

"These opportunities ought to be evaluated in terms of the next vision of what the city ought to be," said Eric Moss, the architect on a project that would squeeze 140 units onto the Venice parking lot, along with a parking structure to preserve all the spaces there now. "Those lots belong to a completely different history and a completely different time."

But how many of them ultimately prove viable will depend on many unknowns, among them the reaction of council offices and neighborhood groups and the ingenuity of architects in making the most of parcels that in many cases are small, oddly shaped and represent a prized resource.

"I think we're going backwards," Lincoln Heights real estate broker Steven Koster said about a proposal to


City-owned parking lots

estate broker Steven Kasten said about a proposal to build on lots there. "Merchants are not going to have parking. People are going to move out. It's going to hurt business."

The idea of converting public parking to housing has been around for decades in L.A. but has gained little traction. In the 1980s, Mayor Tom Bradley proposed leasing rights to developers to build multifamily housing, but there was no follow-up.

Northeast-area Councilman Gil Cedillo revived the idea in 2008 with a plan to build 80 units on three city lots near the Gold Line in Highland Park.

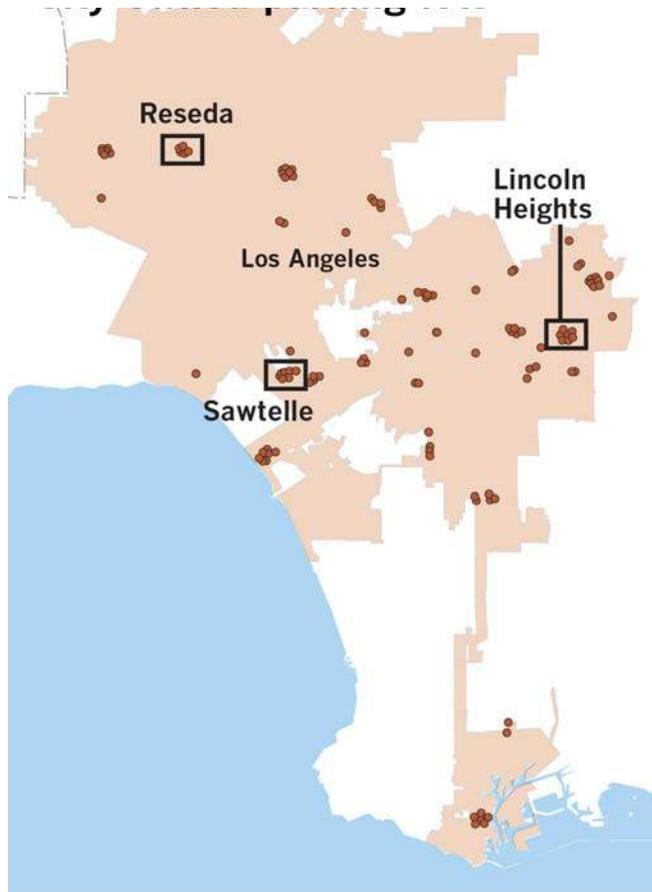
That plan fell into limbo after a neighborhood group, Friends of Highland Park, sued, alleging the environmental review approved by the city was inadequate. A trial court's ruling for the city was overturned on appeal. The city chose not to appeal further, and the project remains stalled.

The new parking lot review grew out of an urgency to implement Proposition HHH, the \$1.2-billion bond measure approved by the voters to help fund the construction of 1,000 permanent supportive housing units each year.



swaying palm trees and idling traffic, living under freeways, alongside riverbeds and on canyon hillsides. The mentally ill, the drug addicts, the economically disadvantaged, many with their life belongings in a backpack or shopping cart. In this ongoing series, Without a Home, The Times is examining the crisis of homelessness in our region.

After sifting through more than 500 prospects, the City Administrative Office has narrowed the field to 129 sites that are potentially large enough and in suitable zones. All but 10 are public parking lots.



Sources: Los Angeles City Administrative Office, Los Angeles Department of Transportation, Los Angeles County Assessor. Graphics reporting by Doug Smith

Paul Duginski / @latimesgraphics

With taxpayer funds now committed, a new obstacle emerged. The scarcity of suitable land in the city's highly competitive real estate market could add years to the start-up time for new projects.

Mayor Eric Garcetti and the City Council have promised the city would speed up construction by providing land from its portfolio of surplus property.

Sawtelle

Seven lots totaling 78,000 square feet are clustered around Santa Monica Boulevard west of the 405 Freeway. They produced \$224,523 in revenue in the last fiscal year.



Sources: Mapzen, OpenStreetMap, Times reporting

Paul Duginski / @latimesgraphics

The city's Housing and Community Investment Department is also planning to offer affordable housing developers 24 city-owned lots, most acquired from the Community Redevelopment Agency when it was dissolved by the state in 2012.

Combined, the properties could support thousands of new units. Some would go to low-income renters, whether they are homeless or not. But even if only half the units were set aside for homeless people, that would make up a substantial boost to the 10-year building goal.

But the hope that using city properties would dramatically speed the pace of construction is being tested by the realities of city procedures.

Yolanda Chavez, an assistant city administrative officer, said the office is reviewing lots a few at a time and will confer with the Department of Transportation to determine their suitability and the number of spaces that need to be preserved.

Then a motion from the City Council office is required to proceed with a planning report. After that the lot can be offered for bidding.

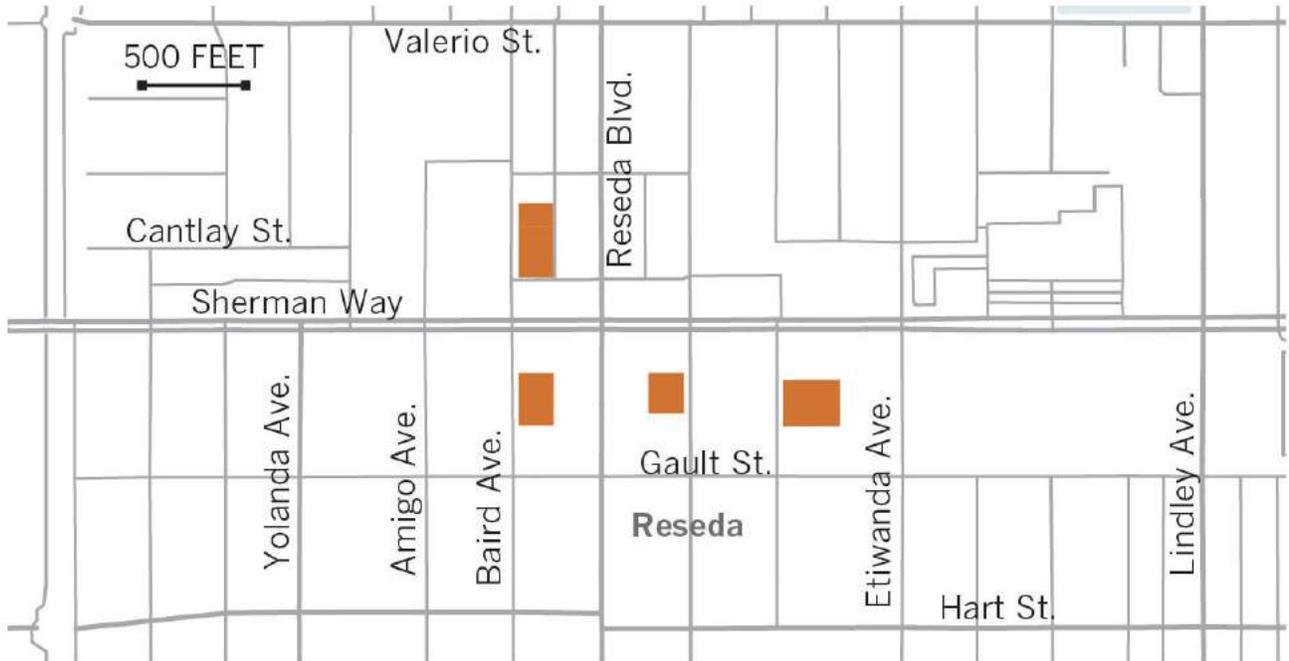
Chavez said she hopes to offer several properties for proposals in February and then a few more twice a year.

Because the process incurs costs, such as appraisal fees, Chavez said she requires a show of support from a City Council member in the form of a motion before she will begin it.

Though there are city parking lots in almost every council district, only a handful of motions have been introduced so far.

Reseda

Lots totaling 128,900 square feet are clustered around Sherman Way. None produce revenue.



Sources: Mapzen, OpenStreetMap, Times reporting

Paul Duginski / @latimesgraphics

A Times survey of dozens of lots showed challenges unique to each.

The smallest, with only seven spaces on West Washington Boulevard in Mid-City, is among a few that may simply be too small for multistory buildings. The largest is unlikely to be replaced by housing. It is a structure with more than 3,000 spaces built into the Dolby Theatre complex in Hollywood, and generates \$12 million a year in revenue.

Most are on side streets a block from major suburban boulevards and serve one- or two-story commercial buildings.

Architects will have to design three- to five-story buildings that blend with both the businesses and with adjoining residential neighborhoods.

About two-thirds of the lots are metered and bring revenue to the city.

The amount of parking to be replaced would have to be decided case by case.

Because many of the lots are in clusters, there are opportunities for creative planning. Replacement parking could be built on one lot, for example, with housing on other ones nearby.

In almost every case, the scale of the project would change the character of a neighborhood, potentially bringing new life to aging business districts, but almost certainly stirring opposition in some. The strategy is getting its first test in Venice.





Rebecca Dannenbaum peers out from the pedestrian tunnel where she and other homeless people have been living in Venice.



A couple walk through Parking Lot 731 in Venice, where 140 housing units could be built on either side of the historic canal.



Vietnam veteran Frank Costa lives in a pedestrian tunnel underneath Parking Lot 731 on Pacific Avenue in Venice. (Photographs by Genaro Molina / Los Angeles Times)

Parking Lot 731, spanning the Grand Canal, provides 188 spaces in a parking-tight district where bohemian businesses, struggling artists and owners of multimillion-dollar homes mix only two blocks from the beach. It pulls in more than \$1 million a year for the city.

Two nonprofits, Venice Community Housing and Hollywood Community Housing Corp., have been selected to develop the lot, with plans for 140 housing units in two buildings on either side of the historic canal.

The project is required to preserve all the public parking, with an additional 143 spaces for the tenants and retail, said Venice Community Housing executive director Becky Dennison.

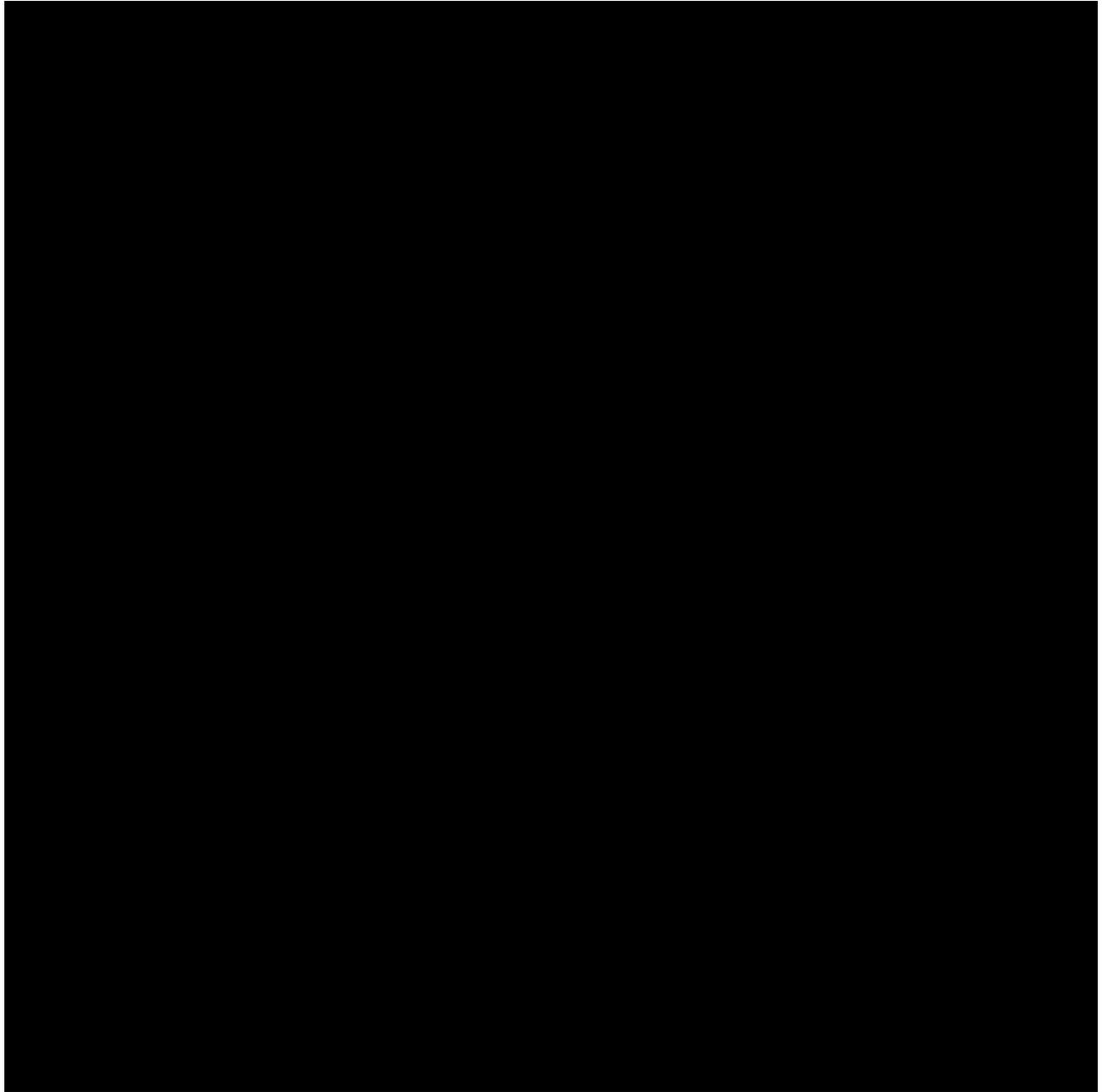
Preliminary designs by Eric Owen Moss Architects show the parking in two multistory structures encircled by the

living spaces and retail — a configuration made possible by the size of the property, at 121,000 square feet one of the city's largest parking lots.

The plan has yet to be formally presented to the community, but preliminary plans released last year stirred opposition from some community groups.

Moss said capturing the spirit of Venice is his challenge as he is "working carefully within a height limit, working carefully within a unit count, reconstitution of the canal, public sense of obligation to retail and art walks. We're fitting all of those intelligently onto the site."

Safran & Associates, a for-profit developer, has been selected to develop affordable housing on a lot on Wilcox Avenue in Hollywood, across the street from the high-end Dream Hollywood hotel.



Two men walk through the parking lot at 1637 North Wilcox Avenue in Hollywood. Safran & Associates, a for-profit developer of affordable housing, has been selected to develop the lot which rests across the street from the high-end Dream Hollywood hotel. (Genaro Molina / Los Angeles Times)



Tyler Monroe, Safran's vice president for development, said plans for the 45,000-square-foot lot are not set but

will preserve the existing 149 spaces.

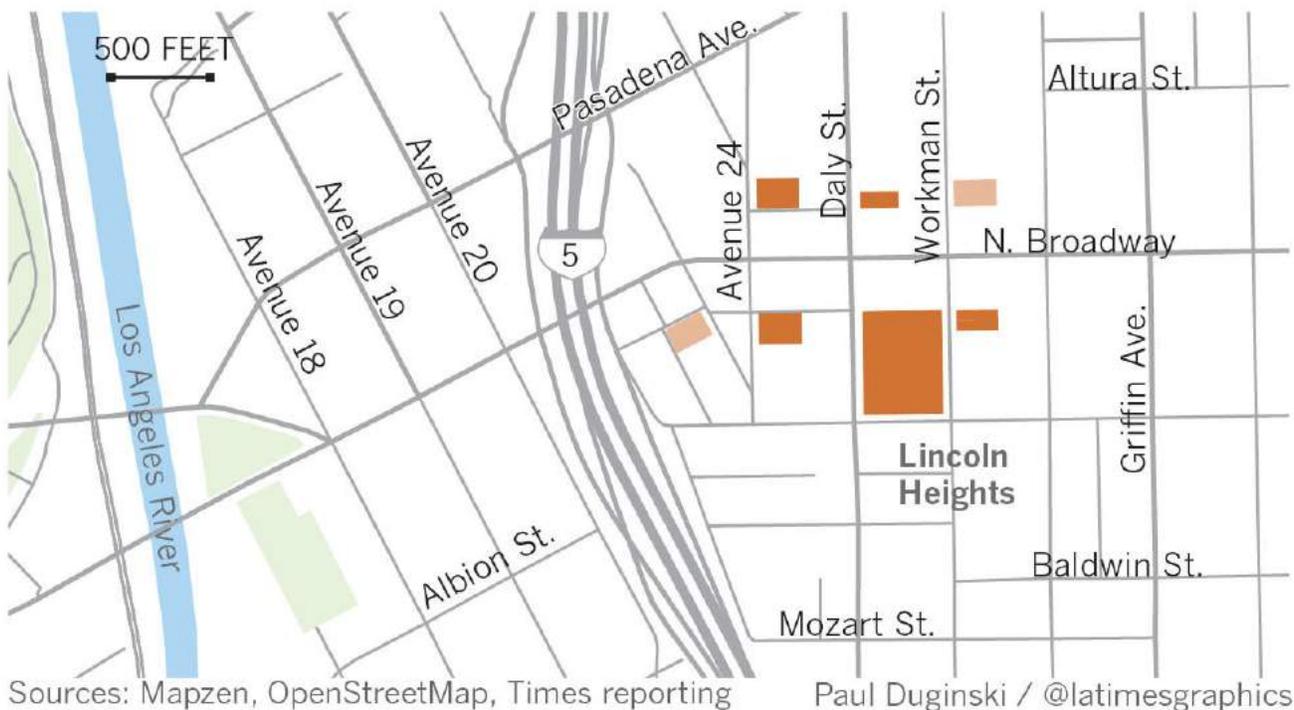
Because they are so large, the Venice and Hollywood lots are among the least challenging for designers.

Across the city, seven smallish lots scattered around North Broadway in Lincoln Heights may set the tone for how the program will unfold in other aging commercial centers, including Echo Park, Van Nuys, Reseda, Canoga Park and Sawtelle.

The lots are not financial assets for the city. Three offer free parking, and the others generate only hundreds of dollars a year per space, compared with thousands for more-productive lots.

Lincoln Heights

Lots totaling 132,180 square feet are clustered around North Broadway. A nonprofit development team is preparing plans for five of the lots. They produced \$94,214 in revenue in the last fiscal year.



Collectively they provide a large building space, but it is cut into inconveniently small pieces. The smallest is only 10,000 square feet.

Cedillo, the area's councilman, has proposed to offer five of the seven lots for housing. But community reaction could be critical.

At a January meeting of the Lincoln Heights Neighborhood Council, a field deputy for Cedillo faced more than 100 residents who were upset that two developers — WORKS, a northeast L.A. nonprofit, and the for-profit GTM Holdings — were given an exclusive negotiating agreement to build on the lots without public input.

The deputy, Jose Rodriguez, told the residents they would be able to work with the developer to design the plan.

Channa Grace, the president and chief executive of WORKS, said she expects the project to include senior housing

and other affordable housing and some replacement parking, in addition to permanent supportive housing for homeless people.

"We're looking to have a robust outreach and get input from the community," Grace said. "Take what we find and go out into the community. Talk to folks, see what they're thinking."

Some who attended the neighborhood council meeting expected those talks to be tough.

"There is no warmth for this project right now from this community," said Lincoln Heights resident and political blogger Scott Johnson.

doug.smith@latimes.com

Twitter: [@LATDoug](https://twitter.com/LATDoug)



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Doug Smith

CONTACT



Senior writer Doug Smith scouts Los Angeles for the ragged edges where public policy meets real people, combining data analysis and gumshoe reporting to tell L.A. stories through his 45 years of experience covering the city. As past database editor from 2004 through 2015, he hunted down and analyzed data for news and investigative projects. Besides "[Grading the Teachers](#)," he contributed to investigations of construction abuse in the community college system and the rising toll of prescription drug overdoses. Smith has been at The Times since 1970, covering local and state government, criminal justice, politics and education. He was the lead writer for Times' coverage of the infamous North Hollywood shootout, winner of a 1997 Pulitzer Prize. Between 2005 and 2008, Smith made five trips to Iraq on loan to our foreign desk.

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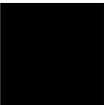
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March 6, 2018

Advocates for the Environment

A non-profit public-interest law firm
and environmental advocacy organization



Planning and Land Use Management Committee
City of Los Angeles
200 N. Spring Street
City Hall—Room 360
Los Angeles, CA 90012

Date: 3-6-18
Submitted in PLUM Committee
Council File No: 17-1422
Item No.: 5
Deputy: publi-

Via U.S. Mail and email to clerk.plumcommittee@lacity.org

Re: PLUM Committee March 6, 2018 Meeting, Item No. 5, Council File #17-1422,
Permanent Supportive Housing Ordinance, Case No. CPC-2017-3136-CA, ENV-
2017-3137-MND

Dear PLUM Committee:

I write on behalf of Advocates for the Environment as well as this firm's client, Coalición para Proteger Lincoln Heights, a Lincoln Heights citizens group. We are concerned about the fact that the City is proposing to build six separate Permanent Supportive Housing (PSH) facilities in Lincoln Heights. While we generally support the City's efforts to accommodate the local homeless population, putting such a large number of PSH facilities in a single neighborhood unduly burdens that neighborhood. And it raises environmental-justice concerns. Even though some of the proposed PSH facilities are located in Venice, most of them, and many of the completed PSH projects, are located in relatively poor areas and areas populated primarily by people of color. Many of them are located in areas designated by the California Environmental Protection Agency as "disadvantaged communities" under SB 535. There are no PSH properties proposed, and no previously approved PSH projects, on the West Side of Los Angeles or in relatively affluent areas of the San Fernando Valley such as Sherman Oaks and Encino.

102-1

My clients are very concerned about the PSH Project's potential impacts on parking in Lincoln Heights. The sites the City chose for PSH facilities in that neighborhood are primarily City-owned parking lots that the City acquired based on an understanding with local businesses that the parking lots would continue to provide parking for businesses in the area. The PSH Ordinance allows PSH facilities to be built with no parking or minimal parking when they are to be occupied by disadvantaged or chronically homeless individuals. That would reduce the already scarce supply of parking in Lincoln Heights.

The PSH ordinance is inconsistent with the City's General Plan—the Framework Element and the Community Plans—in many ways. It allows the construction of PSH facilities in areas with land-use designations inconsistent with those facilities and with the relaxed standards contained in the PSH Ordinance. The proposed new Los Angeles Municipal Code (LAMC) § 14.00 A(13) declares that “the grant of any bonuses, incentives, or concessions under this subdivision shall not be considered an increase in density or other change which requires any corresponding zone change, general plan amendment, specific plan exception or discretionary action,” but the City cannot legally override its General Plan in this manner. Before the PSH Ordinance can be adopted by the City, the General Plan must be amended to be consistent with the ordinance, or the ordinance will be void when adopted. (*Leshar Communications, Inc. v. City of Walnut Creek* (1990) 52 Cal.3d 531, 541.)

102-2

The Mitigated Negative Declaration (MND) for the PSH Ordinance glosses over several potentially significant impacts. The Ordinance would potentially exempt hundreds of PSH projects over the coming years from CEQA analysis, but the MND fails to take into account the myriad different circumstances that may attend the various projects. From this perspective, the PSH Ordinance may be one of the most significant Projects the City has been asked to approve, in terms of its environmental impacts. The MND analysis assumes that 200 PSH units will be built each year for 10 years, and that another 1,000 PSH units/year may be built, based on Measure HHH funding. (Page II-5.) But the MND fails to include cumulative-impacts analysis showing the effects of these 12,000 PSH units that could be built over the next 10 years.

102-3

The MND analysis of the following effects fails to show that those effects will be mitigated into insignificance by the mitigation measures required by the MND:

- Aesthetics: nighttime glare from project lights. The MND just dismisses this as an issue, but adding hundreds of buildings, each with indoor and outside lighting, will add significantly to the area's light pollution. See https://en.wikipedia.org/wiki/Light_pollution
- Air Quality: The MND's analysis (on page IV-6) says that each PSH project will likely be under the City's threshold, but the project enables the construction of thousands of such projects. The Project's cumulative air-quality impacts have not been adequately analyzed, given the potential for construction of 12,000 PSH units city-wide, and a great deal of other construction occurring in the City.
- Greenhouse Gases: The MND's analysis shows that the Project's GHG emissions may be on the order of 12,474 metric tons per year. (Page IV-32.) This is a large enough number to represent a significant impact, and the MND contains no analysis showing this amount would not be significant. It also indulges in improper CEQA piecemealing when it points out that most PSH projects would individually be exempt under SB 375. (Page IV-35.) The MND is required to analyze the entire Project, and not break it up into individual pieces, then find their individual environmental effects insignificant.

102-4

102-5

102-6

Many of the MND's discussions of environmental impacts, e.g. of native-American cultural resources, assume that applicable regulations will mitigate the impacts to a level that is insignificant, but the MND in many cases fails to provide evidence or analysis supporting these assumptions.

102-7

We request that, before approving the PSH Ordinance, the City Council:

- Re-evaluate the distribution of proposed PSH facilities to distribute them more fairly and evenly over the City, consistent with principles of environmental justice;
- Amend the General Plan to be consistent with the proposed ordinance;
- Find a way to replace the parking in Lincoln Heights that would be lost as a result of replacement of City parking lots with homeless facilities; and
- Prepare an Environmental Impact Report for the PSH Ordinance.

Sincerely,



Dean Wallraff, Attorney at Law
Executive Director, Advocates for the Environment



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

Karen Kennedy <kkennedy@nasassets.com>
Reply-To: kkennedy@nasassets.com
To: cally.hardy@lacity.org

Mon, Mar 12, 2018 at 6:39 AM

Cally Hardy,

Is there a homeless crisis in Los Angeles? For sure there is, this fact is not in question. However, State and local safeguards which have protected citizens and the environment for over 40 years are in place for very good and rationale reasons. A crisis of homelessness does not mean that those reasons no longer exist. In a time of crisis, rules that protect the environment and those that live in it cannot be pushed aside as an inconvenience, they must be observed and protected. To do otherwise backslides on 40 years of environmental progresses and ignores the rights of impacted parties, citizens and property owners, alike, throughout Los Angeles.

We live in District 11, in an area commonly known as the Oxford Triangle. Our properties are bounded by Lincoln Blvd. to the east, Washington Blvd. to the north and Admiralty to the southwest. We strongly object and bring to your attention the breach that is taking place in full view of the City's obligation to adhere to the CEQA process regarding the Permanent Supportive Housing Ordinance.

We have repeatedly pointed out a number of serious defects in the City's process, including the failure to circulate the Mitigated Negative Declaration ["MND"] for the required 30-day period. The re-circulated MND does not respond to, nor does it address, any of the public comments received during the MND's initial and inadequate 21-day comment period. All letters received during both the current comment period and also the original 21-day comment period must, by operation of law, be presented to the City Council Planning and Land Use ["PLUM"] committee, along with responses to said comments. You should be clear, as are we, that recirculation of the MND only addressed two of the many failing of the City's process.

We are not asking for special consideration. Rather, we are demanding that our rights be acknowledged and not quashed in the City's attempt to right a serious issue.

We have taken the step of retaining counsel, Channel Law, to represent us. While this was not something we wanted to do, the actions and deliberate steps taken by the City, in its various capacities, left us with no other alternative.

Here are some, but not all of the issues we have identified to date:

1. The City conducted public hearings and ended the comment period on the ordinance on October 30, 2017, prior to the release of the MND

2. The Planning Commission made changes to the PSH Ordinance after the MND was released for comment
3. The Planning Commission took action on the project on December 14, 2017 prior to the close of the MND comment period on December 20, 2017
4. The City has demonstrated failure to address Channel Law's December 20, 2017 comments regarding procedural and substantive defects in the November 27, 2017 MND circulated for Public Review and Comment from November 30, 2017 to December 20, 2017 and the associated process
5. The City has failed to rescind the Planning Commission findings despite the falsehoods contained in those same findings
6. Project Splitting – Failure to Analyze the whole of the action – production of PSH Housing per City's Comprehensive Homeless Strategy
7. Flawed Project assumptions and the potential underestimation of impacts
8. Inadequate Project Description and failure to adequately disclose and analyze new CEQA exemptions created the project
9. Project impacts not taken into consideration include but not limited to aesthetics, air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, noise, population and housing, public services [police/fire/emergency protection, water demand vs. resources, schools]

Given the foregoing we respectfully demand the City take the following actions:

1. Void the actions taken by the Planning Commission regarding the PSH Ordinance and associated environment documents
2. Prepare an EIR to address the potential impacts of the full range of the City's efforts to provide housing for homeless persons in the City
3. The EIR should include an analysis of the growth-inducing impacts of the production of housing for homeless persons
4. Comply with CEQA-mandated process requirements.

Thank you.

Karen Kennedy

kkennedy@nasassets.com

847 Dickson St.

[Marina del Rey, California 90292](#)



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

CJ Cole <cj16@cjcole.com>
Reply-To: cj16@cjcole.com
To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 1:08 PM

Cally Hardy,

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Thank you.

CJ Cole

cj16@cjcole.com

457 Carroll Canal

Cenice, California 90291



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

Jay Cole <jay@venicebeachliving.com>
Reply-To: jay@venicebeachliving.com
To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 1:09 PM

Cally Hardy,

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Jay Cole

jay@venicebeachliving.com

457 carroll canal

[venice, California 90291](#)



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

39 messages

JT RAPPORT <info@actionnetwork.org>

Reply-To: jtrapport@gmail.com

To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 1:06 PM

Cally Hardy,

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JT RAPPORT

jtrapport@gmail.com

848 HARBOR CROSSING LN

CA, California 90292

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Elizabeth Le
mamalepek@yahoo.com
13700 Marina Pointe Drive
[Marina Del rey, California 90292](#)

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Thank you.

Jeanne Austin
jcaustin11@hotmail.com

Bakersfield, California 93312

Fara Pasarell <info@actionnetwork.org>
Reply-To: fara.pasarell@gmail.com
To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 1:17 PM

Cally Hardy,

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Fara Pasarell

fara.pasarell@gmail.com

13700 Marina Pointe Drive #729

[Marina Del Rey, California 90292](#)

Amir Behrozi <info@actionnetwork.org>
Reply-To: abehrozi@gmail.com
To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 1:18 PM

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Amir Behrozi
abehrozi@gmail.com

Marina del Rey, California 90292

Farideh Behrozi <info@actionnetwork.org>
Reply-To: faridehbehrozi@yahoo.com
To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 1:23 PM

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Farideh Behrozi
faridehbehrozi@yahoo.com

Marina del Rey, California 90292

Francesca Bress <info@actionnetwork.org>
Reply-To: fmcoloma@hotmail.com
To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 1:24 PM

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Nathan Janos <info@actionnetwork.org>
Reply-To: nathan.janos@gmail.com
To: cally.hardy@lacity.org

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Thank you.

Nathan Janos

nathan.janos@gmail.com

1111 Berkeley Dr

[Marina Del Rey, California 90292](#)

Kim Gordon <info@actionnetwork.org>
Reply-To: kimconcha@gmail.com
To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 1:35 PM

Cally Hardy,

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Kim Gordon
kimconcha@gmail.com
941 Princeton dr
[Marina Del Rey , California 90292](#)

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Thank you.

Nina Cerbo
neners56@yahoo.com
708 Oxford ave
[Marina del rey, California 90292](#)

Serafino Sini <info@actionnetwork.org>
Reply-To: serafino.sini@gmail.com
To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 1:46 PM

Cally Hardy,

Hello,

My name is Serafino Sini, i am a resident in the Marina Del Rey neighborhood. I have attended meetings with the planning commission and am disappointed that none of my concerns or other

residents concerns were taken seriously regarding the re-use of the "Thatcher Yard". The issue of most concern is the fact that as a resident I have to follow all guidelines from the city of Los Angeles as well as the Coastal commission, and now for the thatcher yard all rules and regulatory compliance requirements are being circumvented. You cannot apply laws and regulations when convenient: This is the fabric of a viable democracy. Rules should be followed by all parties, otherwise we no different then an oligarchy! If you are letting some break the rules, then set new rules for all! But, guess what, this approach would lead to the City of Los Angeles, becoming the city of hell (not "Angels")

Every other city has pushed their problems to Los Angeles, because we care. I am ok with that, I care, but lets try to not to "kill the patient" while "administering the cure"

I agree there is a homeless crisis in Los Angeles. For sure there is, this fact is not in question. However, State and local safeguards which have protected citizens and the environment for over 40 years are in place for very good and rationale reasons. A crisis of homelessness does not mean that those reasons no longer exist. In a time of crisis, rules that protect the environment and those that live in it cannot be pushed aside as an inconvenience, they must be observed and protected. To do otherwise backslides on 40 years of environmental progresses and ignores the rights of impacted parties, citizens and property owners, alike, throughout Los Angeles.

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Serafino Sini
serafino.sini@gmail.com
843 Oxford Ave.
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Patricia Schroeder
designingbytricia@yahoo.com
marina Pointe Drive Unit 1508
Marina del rey, California 90292

Steven Erwin <info@actionnetwork.org>
Reply-To: sperwin98@gmail.com
To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 2:01 PM

Cally Hardy,

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Steven Erwin
sperwin98@gmail.com

Marina Del Rey, California 90292

Cassandra Blanco <info@actionnetwork.org>
Reply-To: cassavega7@yahoo.com
To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 2:15 PM

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Cassandra Blanco
cassavega7@yahoo.com
3259 thatcher ave
Mdr, California 90292

Jeffrey B Stoll <info@actionnetwork.org>
Reply-To: jstoll@hotmail.com
To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 2:17 PM

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Jeffrey B Stoll

jstoll@hotmail.com

13600 Marina Pointe Dr. No. 1107

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John Slezak <info@actionnetwork.org>
Reply-To: jslezak1@hotmail.com
To: cally.hardy@lacity.org

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4. Comply with CEQA-mandated process requirements.

Thank you.

John Slezak
jslezak1@hotmail.com

Marina Del Rey, California 90292

Samuel Klein <info@actionnetwork.org>
Reply-To: klein_samuel@hotmail.com
To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 3:03 PM

Cally Hardy,

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Thank you.

Samuel Klein
klein_samuel@hotmail.com
927 Burrell Street
Venice, California 90292

Ann Beck <info@actionnetwork.org>
Reply-To: purplebeck@yahoo.com
To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 3:09 PM

Cally Hardy,

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Thank you.

Ann Beck

Ann Beck

purplebeck@yahoo.com

13700 marina Pointe dr

[Marina del Rey, California 90292](#)

Reply-To: billhubner@gmail.com
To: cally.hardy@lacity.org

Cally Hardy,

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WILLIAM F HUBNER
billhubner@gmail.com
13700 MARINA POINTE DR. # 829
[MARINA DEL REY, California 90292](#)

Alice Kwan <info@actionnetwork.org>
Reply-To: envdoc@yahoo.com
To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 3:55 PM

Cally Hardy,

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[Marina del Rey, California 90292](#)

Charles Cowley <info@actionnetwork.org>
Reply-To: mdrchuck@gmail.com
To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 4:07 PM

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Charles Cowley
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850 Dickson Street
[Marina del Rey, California 90292](#)

Tim Korba <info@actionnetwork.org>
Reply-To: timkorba@yahoo.com
To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 4:45 PM

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Tim Korba
timkorba@yahoo.com

Marina Del Rey, California 90292

Tina Bonrouhi <info@actionnetwork.org>
Reply-To: tinagbon@yahoo.com
To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 4:48 PM

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Tina Bonrouhi
tinagbon@yahoo.com

Marina Del Rey, California 90292

RAMIN GHODSI <info@actionnetwork.org>
Reply-To: ghodsim@yahoo.com
To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 4:55 PM

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4. Comply with CEQA-mandated process requirements.

Thank you.

RAMIN GHODSI

ghodsim@yahoo.com

13700 marina pointe drive

[Marina Del rey, California 90292](#)

Adam Liebross <info@actionnetwork.org>

Reply-To: liebross@gmail.com

To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 5:04 PM

Cally Hardy,

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Thank you.

Adam Liebross
liebross@gmail.com
402 Howland canal
CA, California 90291

Mark Merritt <info@actionnetwork.org>
Reply-To: markemerritt@gmail.com
To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 5:08 PM

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Mark Merritt
markemerritt@gmail.com
924 burrell street
[marina del rey, California 90292](#)

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DONNA GOODLEY
donnakei@yahoo.com
3008 YALE AVE
[MARINA DEL REY, California 90292](#)

Dominic Ornato <info@actionnetwork.org>
Reply-To: djorn2000@yahoo.com
To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 6:03 PM

Cally Hardy,

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Dominic Ornato
djorn2000@yahoo.com
13600 Marina Pointe Drive
CA, California 90292

Blake Taylor <info@actionnetwork.org>
Reply-To: blake.r.taylor@gmail.com
To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 6:07 PM

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Blake Taylor
blake.r.taylor@gmail.com
13700 Marina Pointe Drive #1107
[Marina Del Rey, California 90292](#)

Susan Steinberg-Oren <info@actionnetwork.org>
Reply-To: steinbergoren1@gmail.com
To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 7:21 PM

Cally Hardy,

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Susan Steinberg-Oren
steinbergoren1@gmail.com

Marina Del Rey, California 90292-9253

Jeanne Barry <info@actionnetwork.org>
Reply-To: jeannebarry86@gmail.com
To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 7:38 PM

Cally Hardy,

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Jeanne Barry
jeannebarry86@gmail.com
814 Howard Street
Marina del Rey, California 90292

Susan Zechter <info@actionnetwork.org>
Reply-To: sczechter@aol.com
To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 7:48 PM

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4. Comply with CEQA-mandated process requirements.

Thank you.

Susan Zechter
sczechter@aol.com

Marina Del Rey, California 90292

Ken Halloway <info@actionnetwork.org>
Reply-To: kenhalloway10@gmail.com
To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 8:00 PM

Cally Hardy,

This is my neighborhood. This is where I live. This affects me. I request your attention to this.

Is there a homeless crisis in Los Angeles? For sure there is, this fact is not in question. However, State and local safeguards which have protected citizens and the environment for over 40 years are in place for very good and rationale reasons. A crisis of homelessness does not mean that those reasons no longer exist. In a time of crisis, rules that protect the environment and those that live in it cannot be pushed aside as an inconvenience, they must be observed and protected. To do otherwise backslides on 40 years of environmental progresses and ignores the rights of impacted parties, citizens and property owners, alike, throughout Los Angeles.

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Thank you.

Ken Halloway
kenhalloway10@gmail.com
3013 Carter Avenue
[marina del rey, California 90292](#)

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Thank you.

Alexandra Gucovsky
beachbubbles94@gmail.com
2909 Grayson Avenue
[Venice, California 90291](#)

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Thank you.

Gary Mancuso
gpm008a@gmail.com
13700 Marina Pointe Drive, #1020
[Marina Del Rey, California 90292](#)

William Durfee <info@actionnetwork.org>
Reply-To: williamdurfee@gmail.com
To: cally.hardy@lacity.org

Thu, Mar 15, 2018 at 9:22 AM

Cally Hardy,

Is there a homeless crisis in Los Angeles? For sure there is, this fact is not in question. However, State and local safeguards which have protected citizens and the environment for over 40 years are in place for very good and rationale reasons. A crisis of homelessness does not mean that those reasons no longer exist. In a time of crisis, rules that protect the environment and those that live in it cannot be pushed aside as an inconvenience, they must be observed and

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Thank you.

William Durfee

williamdurfee@gmail.com

13600 Marina Pointe Drive #507

[Marina del Rey, California 90292](#)

Richard Barry <info@actionnetwork.org>
Reply-To: ricbarr2@aol.com
To: cally.hardy@lacity.org

Thu, Mar 15, 2018 at 6:19 PM

Cally Hardy,

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Richard Barry
ricbarr2@aol.com
814 Howard Street
CA, California 90292

Meredith Austin <info@actionnetwork.org>
Reply-To: Meredith.Austin22@gmail.com
To: cally.hardy@lacity.org

Thu, Mar 15, 2018 at 11:10 PM

Cally Hardy,

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Meredith Austin

Meredith.Austin22@gmail.com

Marina Del Rey, California 90292

Bruce W. Rapport <info@actionnetwork.org>
Reply-To: bwrapport@gmail.com
To: cally.hardy@lacity.org

Fri, Mar 16, 2018 at 9:42 AM

Cally Hardy,

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Thank you.

Bruce W. Rapport

bwrapport@gmail.com

848 Harbor Crossing Ln

Marina del Rey, California 90292



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

Tyson Caffo <tcaffo@me.com>
Reply-To: tcaffo@me.com
To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 1:14 PM

Cally Hardy,

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Tyson Caffo

tcaffo@me.com

749 Oxford Ave

[Marina del Rey, California 90292](#)



Cally Hardy <cally.hardy@lacity.org>

The PSH Ordinance and Mitigated Negative Declaration actions

1 message

GORDON SMITH <info@actionnetwork.org>

Reply-To: gordonsmith17@yahoo.com

To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 1:15 PM

Cally Hardy,

There is no question that there is a homeless crisis in Los Angeles, however, State and local safeguards which have protected citizens and the environment for over 40 years are in place for very good and rationale reasons. A crisis of homelessness does not mean that those reasons no longer exist. In a time of crisis, rules that protect the environment and those that live in it cannot be pushed aside as an inconvenience, they must be observed and protected. To do otherwise backslides on 40 years of environmental progresses and ignores the rights of impacted parties, citizens and property owners, alike, throughout Los Angeles.

We live in District 11, in an area commonly known as the Oxford Triangle. Our properties are bounded by Lincoln Blvd. to the east, Washington Blvd. to the north and Admiralty to the southwest. We strongly object and bring to your attention the breach that is taking place in full view of the City's obligation to adhere to the CEQA process regarding the Permanent Supportive Housing Ordinance.

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Given the foregoing we respectfully demand the City take the following actions:

1. Void the actions taken by the Planning Commission regarding the PSH Ordinance and associated environment documents
2. Prepare an EIR to address the potential impacts of the full range of the City's efforts to provide housing for homeless persons in the City
3. The EIR should include an analysis of the growth-inducing impacts of the production of housing for homeless persons
4. Comply with CEQA-mandated process requirements.

Thank you.

GORDON SMITH

gordonsmith17@yahoo.com

13600 Marina Pointe Drive, unit 1603

[Marina Del Rey, California 90292](#)



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

1 message

Jonathan Hyman <Jonathan.Hyman@knobbe.com>

Wed, Mar 14, 2018 at 1:31 PM

Reply-To: Jonathan.Hyman@knobbe.com

To: cally.hardy@lacity.org

Cally Hardy,

Save our single family neighborhoods! Save our neighborhood from more traffic and more overcrowding at our schools!

Is there a homeless crisis in Los Angeles? For sure there is, this fact is not in question. However, State and local safeguards which have protected citizens and the environment for over 40 years are in place for very good and rationale reasons. A crisis of homelessness does not mean that those reasons no longer exist. In a time of crisis, rules that protect the environment and those that live in it cannot be pushed aside as an inconvenience, they must be observed and protected. To do otherwise backslides on 40 years of environmental progresses and ignores the rights of impacted parties, citizens and property owners, alike, throughout Los Angeles.

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4. Comply with CEQA-mandated process requirements.

Thank you.

Jonathan Hyman
Jonathan.Hyman@knobbe.com
3012 Yale Avenue
[Marina del Rey, California 90292](#)



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

1 message

Hannah Hempstead <hannahhempstead@mac.com>

Wed, Mar 14, 2018 at 1:43 PM

Reply-To: hannahhempstead@mac.com

To: cally.hardy@lacity.org

Cally Hardy,

Is there a homeless crisis in Los Angeles? For sure there is, this fact is not in question. However, State and local safeguards which have protected citizens and the environment for over 40 years are in place for very good and rationale reasons. A crisis of homelessness does not mean that those reasons no longer exist. In a time of crisis, rules that protect the environment and those that live in it cannot be pushed aside as an inconvenience, they must be observed and protected. To do otherwise backslides on 40 years of environmental progresses and ignores the rights of impacted parties, citizens and property owners, alike, throughout Los Angeles.

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4. Comply with CEQA-mandated process requirements.

Thank you.

Hannah Hempstead
hannahhempstead@mac.com
835 Dickson Street
[Marina Del Rey, California 90292](#)



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

Stephen Courtney <stephencourtney@mindspring.com>
Reply-To: stephencourtney@mindspring.com
To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 1:45 PM

Cally Hardy,

Is there a homeless crisis in Los Angeles? For sure there is, this fact is not in question. However, State and local safeguards which have protected citizens and the environment for over 40 years are in place for very good and rationale reasons. A crisis of homelessness does not mean that those reasons no longer exist. In a time of crisis, rules that protect the environment and those that live in it cannot be pushed aside as an inconvenience, they must be observed and protected. To do otherwise backslides on 40 years of environmental progresses and ignores the rights of impacted parties, citizens and property owners, alike, throughout Los Angeles.

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4. Comply with CEQA-mandated process requirements.

Thank you.

Stephen Courtney
stephencourtney@mindspring.com
835 Dickson Street
Marina del Rey, California 90292



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

1 message

George Hesse <georgehesse@verizon.net>

Wed, Mar 14, 2018 at 1:53 PM

Reply-To: georgehesse@verizon.net

To: cally.hardy@lacity.org

Cally Hardy,

Is there a homeless crisis in Los Angeles? For sure there is, this fact is not in question. However, State and local safeguards which have protected citizens and the environment for over 40 years are in place for very good and rationale reasons. A crisis of homelessness does not mean that those reasons no longer exist. In a time of crisis, rules that protect the environment and those that live in it cannot be pushed aside as an inconvenience, they must be observed and protected. To do otherwise backslides on 40 years of environmental progresses and ignores the rights of impacted parties, citizens and property owners, alike, throughout Los Angeles.

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Thank you.

George Hesse
georgehesse@verizon.net
830 Harbor Crossing Lane
[Marina del Rey, California 90292](#)



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

1 message

Shane Hutton <shaneh33@me.com>
Reply-To: shaneh33@me.com
To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 2:10 PM

Cally Hardy,

Is there a homeless crisis in Los Angeles? For sure there is, this fact is not in question. However, State and local safeguards which have protected citizens and the environment for over 40 years are in place for very good and rationale reasons. A crisis of homelessness does not mean that those reasons no longer exist. In a time of crisis, rules that protect the environment and those that live in it cannot be pushed aside as an inconvenience, they must be observed and protected. To do otherwise backslides on 40 years of environmental progresses and ignores the rights of impacted parties, citizens and property owners, alike, throughout Los Angeles.

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Thank you.

Shane Hutton

shaneh33@me.com

3155 Thatcher Ave

[Marina Del Rey, California 90292](#)



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

1 message

Jennifer Hesse <sophstress@verizon.net>

Wed, Mar 14, 2018 at 2:57 PM

Reply-To: sophstress@verizon.net

To: cally.hardy@lacity.org

Cally Hardy,

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Jennifer Hesse
sophstress@verizon.net

Marina Del Rey, California 90292-5450



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

1 message

stephanie Wolff <stephaniewolff@me.com>

Wed, Mar 14, 2018 at 3:22 PM

Reply-To: stephaniewolff@me.com

To: cally.hardy@lacity.org

Cally Hardy,

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We own a condo in District 11, in the Azzurra-[13700 Marina Pointe Dr., Marina del Rey](#) which is very close to an area commonly known as the Oxford Triangle.

My husband & I strongly object and bring to your attention the breach that is taking place in full view of the City's obligation to adhere to the CEQA process regarding the Permanent Supportive Housing Ordinance.

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Thank you.

stephanie Wolff

stephaniewolff@me.com

100 S. Orange Grove Blvd., #303

[CA, California 91105](#)



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

1 message

Gabriele Schnack <schnack_g@yshoo.com>

Wed, Mar 14, 2018 at 3:24 PM

Reply-To: schnack_g@yshoo.com

To: cally.hardy@lacity.org

Cally Hardy,

Is there a homeless crisis in Los Angeles? For sure there is, this fact is not in question. However, State and local safeguards which have protected citizens and the environment for over 40 years are in place for very good and rationale reasons. A crisis of homelessness does not mean that those reasons no longer exist. In a time of crisis, rules that protect the environment and those that live in it cannot be pushed aside as an inconvenience, they must be observed and protected. To do otherwise backslides on 40 years of environmental progresses and ignores the rights of impacted parties, citizens and property owners, alike, throughout Los Angeles.

We live in District 11, in an area commonly known as the Oxford Triangle. Our properties are bounded by Lincoln Blvd. to the east, Washington Blvd. to the north and Admiralty to the southwest. We strongly object and bring to your attention the breach that is taking place in full view of the City's obligation to adhere to the CEQA process regarding the Permanent Supportive Housing Ordinance.

We have repeatedly pointed out a number of serious defects in the City's process, including the failure to circulate the Mitigated Negative Declaration ["MND"] for the required 30-day period. The re-circulated MND does not respond to, nor does it address, any of the public comments received during the MND's initial and inadequate 21-day comment period. All letters received during both the current comment period and also the original 21-day comment period must, by operation of law, be presented to the City Council Planning and Land Use ["PLUM"] committee, along with responses to said comments. You should be clear, as are we, that recirculation of the MND only addressed two of the many failing of the City's process.

We are not asking for special consideration. Rather, we are demanding that our rights be acknowledged and not quashed in the City's attempt to right a serious issue.

We have taken the step of retaining counsel, Channel Law, to represent us. While this was not something we wanted to do, the actions and deliberate steps taken by the City, in its various capacities, left us with no other alternative.

Here are some, but not all of the issues we have identified to date:

1. The City conducted public hearings and ended the comment period on the ordinance on October 30, 2017, prior to the release of the MND

2. The Planning Commission made changes to the PSH Ordinance after the MND was released for comment
3. The Planning Commission took action on the project on December 14, 2017 prior to the close of the MND comment period on December 20, 2017
4. The City has demonstrated failure to address Channel Law's December 20, 2017 comments regarding procedural and substantive defects in the November 27, 2017 MND circulated for Public Review and Comment from November 30, 2017 to December 20, 2017 and the associated process
5. The City has failed to rescind the Planning Commission findings despite the falsehoods contained in those same findings
6. Project Splitting – Failure to Analyze the whole of the action – production of PSH Housing per City's Comprehensive Homeless Strategy
7. Flawed Project assumptions and the potential underestimation of impacts
8. Inadequate Project Description and failure to adequately disclose and analyze new CEQA exemptions created the project
9. Project impacts not taken into consideration include but not limited to aesthetics, air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, noise, population and housing, public services [police/fire/emergency protection, water demand vs. resources, schools]

Given the foregoing we respectfully demand the City take the following actions:

1. Void the actions taken by the Planning Commission regarding the PSH Ordinance and associated environment documents
2. Prepare an EIR to address the potential impacts of the full range of the City's efforts to provide housing for homeless persons in the City
3. The EIR should include an analysis of the growth-inducing impacts of the production of housing for homeless persons
4. Comply with CEQA-mandated process requirements.

Thank you.

Gabriele Schnack
schnack_g@yshoo.com

Marina Del Rey, California 90292



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

1 message

Martin Flynn MD <flynnmd@mac.com>

Wed, Mar 14, 2018 at 3:53 PM

Reply-To: flynnmd@mac.com

To: cally.hardy@lacity.org

Cally Hardy,

A crisis of homelessness does not mean that rules enacted to protect the environment and those that live in it can be pushed aside as an inconvenience. They must be properly observed and protected. To do otherwise would backslide on 40 years of environmental progresses and ignores the rights of affected parties, citizens and property owners throughout Los Angeles.

I live in District 11, in an small residential area commonly known as the Oxford Triangle. My home is within an area bounded by Lincoln Blvd. to the east, Washington Blvd. to the north and Admiralty to the southwest.

As such, I strongly object and add to the voices in objection to the breach of duty that is taking place in full view of the City's obligation to adhere to the CEQA process regarding the Permanent Supportive Housing Ordinance.

Others have repeatedly pointed out a number of serious defects in the City's process, including the failure to circulate the Mitigated Negative Declaration ["MND"] for the required 30-day period. The re-circulated MND does not respond to, nor does it address, any of the public comments received during the MND's initial and inadequate 21-day comment period. All letters received during both the current comment period and also the original 21-day comment period must, by operation of law, be presented to the City Council Planning and Land Use ["PLUM"] committee, along with responses to said comments. Please understand that recirculation of the MND only addressed two of the many failing of the City's process.

This is NOT a request for special consideration. Rather, for recognition that our rights be acknowledged and not quashed as the City attempts to correct a serious issue.

The Oxford Triangle Assn. have taken the step of retaining counsel, Channel Law, for representation. While this is an expensive proposition, the actions and deliberate steps, taken by the City in its various capacities, left the OTA with no other alternative.

Some of the enumerated issues, which I'm sure you've heard before, and loudly! :

1. The City conducted public hearings and ended the comment period on the ordinance on October 30, 2017, prior to the release of the MND
2. The Planning Commission made changes to the PSH Ordinance after the MND was released for comment

3. The Planning Commission took action on the project on December 14, 2017 prior to the close of the MND comment period on December 20, 2017
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8. Inadequate Project Description and failure to adequately disclose and analyze new CEQA exemptions created the project
9. Project impacts not taken into consideration include but not limited to aesthetics, air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, noise, population and housing, public services [police/fire/emergency protection, water demand vs. resources, schools]

Given the foregoing, please please please take the following actions:

1. Void the actions taken by the Planning Commission regarding the PSH Ordinance and associated environment documents
2. Prepare an EIR to address the potential impacts of the full range of the City's efforts to provide housing for homeless persons in the City
3. The EIR should include an analysis of the growth-inducing impacts of the production of housing for homeless persons
4. Comply with CEQA-mandated process requirements.

Thank you. for wading through this matter; imagine how we feel!

Best,

Martin Flynn MD
flynnmd@mac.com

Marina Del Rey, California 90292



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

1 message

Fred Talisman <wizz@earthlink.net>

Wed, Mar 14, 2018 at 4:41 PM

Reply-To: wizz@earthlink.net

To: cally.hardy@lacity.org

Cally Hardy,

Is there a homeless crisis in Los Angeles? For sure there is, this fact is not in question. However, State and local safeguards which have protected citizens and the environment for over 40 years are in place for very good and rationale reasons. A crisis of homelessness does not mean that those reasons no longer exist. In a time of crisis, rules that protect the environment and those that live in it cannot be pushed aside as an inconvenience, they must be observed and protected. To do otherwise backslides on 40 years of environmental progresses and ignores the rights of impacted parties, citizens and property owners, alike, throughout Los Angeles.

We live in District 11, in an area commonly known as the Oxford Triangle. Our properties are bounded by Lincoln Blvd. to the east, Washington Blvd. to the north and Admiralty to the southwest. We strongly object and bring to your attention the breach that is taking place in full view of the City's obligation to adhere to the CEQA process regarding the Permanent Supportive Housing Ordinance.

We have repeatedly pointed out a number of serious defects in the City's process, including the failure to circulate the Mitigated Negative Declaration ["MND"] for the required 30-day period. The re-circulated MND does not respond to, nor does it address, any of the public comments received during the MND's initial and inadequate 21-day comment period. All letters received during both the current comment period and also the original 21-day comment period must, by operation of law, be presented to the City Council Planning and Land Use ["PLUM"] committee, along with responses to said comments. You should be clear, as are we, that recirculation of the MND only addressed two of the many failing of the City's process.

We are not asking for special consideration. Rather, we are demanding that our rights be acknowledged and not quashed in the City's attempt to right a serious issue.

We have taken the step of retaining counsel, Channel Law, to represent us. While this was not something we wanted to do, the actions and deliberate steps taken by the City, in its various capacities, left us with no other alternative.

Here are some, but not all of the issues we have identified to date:

1. The City conducted public hearings and ended the comment period on the ordinance on October 30, 2017, prior to the release of the MND

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9. Project impacts not taken into consideration include but not limited to aesthetics, air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, noise, population and housing, public services [police/fire/emergency protection, water demand vs. resources, schools]

Given the foregoing we respectfully demand the City take the following actions:

1. Void the actions taken by the Planning Commission regarding the PSH Ordinance and associated environment documents
2. Prepare an EIR to address the potential impacts of the full range of the City's efforts to provide housing for homeless persons in the City
3. The EIR should include an analysis of the growth-inducing impacts of the production of housing for homeless persons
4. Comply with CEQA-mandated process requirements.

Thank you.

Fred Talisman

wizz@earthlink.net

3132 Thatcher Ave.

[Marina Del Rey, California 90292](#)



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

1 message

Bambi Christie <bambichristie@me.com>

Wed, Mar 14, 2018 at 4:48 PM

Reply-To: bambichristie@me.com

To: cally.hardy@lacity.org

Cally Hardy,

Is there a homeless crisis in Los Angeles? For sure there is, this fact is not in question. However, State and local safeguards which have protected citizens and the environment for over 40 years are in place for very good and rationale reasons. A crisis of homelessness does not mean that those reasons no longer exist. In a time of crisis, rules that protect the environment and those that live in it cannot be pushed aside as an inconvenience, they must be observed and protected. To do otherwise backslides on 40 years of environmental progresses and ignores the rights of impacted parties, citizens and property owners, alike, throughout Los Angeles.

We live in District 11, in an area commonly known as the Oxford Triangle. Our properties are bounded by Lincoln Blvd. to the east, Washington Blvd. to the north and Admiralty to the southwest. We strongly object and bring to your attention the breach that is taking place in full view of the City's obligation to adhere to the CEQA process regarding the Permanent Supportive Housing Ordinance.

We have repeatedly pointed out a number of serious defects in the City's process, including the failure to circulate the Mitigated Negative Declaration ["MND"] for the required 30-day period. The re-circulated MND does not respond to, nor does it address, any of the public comments received during the MND's initial and inadequate 21-day comment period. All letters received during both the current comment period and also the original 21-day comment period must, by operation of law, be presented to the City Council Planning and Land Use ["PLUM"] committee, along with responses to said comments. You should be clear, as are we, that recirculation of the MND only addressed two of the many failing of the City's process.

We are not asking for special consideration. Rather, we are demanding that our rights be acknowledged and not quashed in the City's attempt to right a serious issue.

We have taken the step of retaining counsel, Channel Law, to represent us. While this was not something we wanted to do, the actions and deliberate steps taken by the City, in its various capacities, left us with no other alternative.

Here are some, but not all of the issues we have identified to date:

1. The City conducted public hearings and ended the comment period on the ordinance on October 30, 2017, prior to the release of the MND

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9. Project impacts not taken into consideration include but not limited to aesthetics, air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, noise, population and housing, public services [police/fire/emergency protection, water demand vs. resources, schools]

Given the foregoing we respectfully demand the City take the following actions:

1. Void the actions taken by the Planning Commission regarding the PSH Ordinance and associated environment documents
2. Prepare an EIR to address the potential impacts of the full range of the City's efforts to provide housing for homeless persons in the City
3. The EIR should include an analysis of the growth-inducing impacts of the production of housing for homeless persons
4. Comply with CEQA-mandated process requirements.

Thank you.

Bambi Christie

bambichristie@me.com

13700 Marina Pointe Drive

Marina Del Rey, California 90292



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

1 message

Louise Brady <loulou111@mac.com>
Reply-To: loulou111@mac.com
To: cally.hardy@lacity.org

Wed, Mar 14, 2018 at 5:50 PM

Cally Hardy,

Is there a homeless crisis in Los Angeles? For sure there is, this fact is not in question. However, State and local safeguards which have protected citizens and the environment for over 40 years are in place for very good and rationale reasons. A crisis of homelessness does not mean that those reasons no longer exist. In a time of crisis, rules that protect the environment and those that live in it cannot be pushed aside as an inconvenience, they must be observed and protected. To do otherwise backslides on 40 years of environmental progresses and ignores the rights of impacted parties, citizens and property owners, alike, throughout Los Angeles.

We live in District 11, in an area commonly known as the Oxford Triangle. Our properties are bounded by Lincoln Blvd. to the east, Washington Blvd. to the north and Admiralty to the southwest. We strongly object and bring to your attention the breach that is taking place in full view of the City's obligation to adhere to the CEQA process regarding the Permanent Supportive Housing Ordinance.

We have repeatedly pointed out a number of serious defects in the City's process, including the failure to circulate the Mitigated Negative Declaration ["MND"] for the required 30-day period. The re-circulated MND does not respond to, nor does it address, any of the public comments received during the MND's initial and inadequate 21-day comment period. All letters received during both the current comment period and also the original 21-day comment period must, by operation of law, be presented to the City Council Planning and Land Use ["PLUM"] committee, along with responses to said comments. You should be clear, as are we, that recirculation of the MND only addressed two of the many failing of the City's process.

We are not asking for special consideration. Rather, we are demanding that our rights be acknowledged and not quashed in the City's attempt to right a serious issue.

We have taken the step of retaining counsel, Channel Law, to represent us. While this was not something we wanted to do, the actions and deliberate steps taken by the City, in its various capacities, left us with no other alternative.

Here are some, but not all of the issues we have identified to date:

1. The City conducted public hearings and ended the comment period on the ordinance on October 30, 2017, prior to the release of the MND

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9. Project impacts not taken into consideration include but not limited to aesthetics, air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, noise, population and housing, public services [police/fire/emergency protection, water demand vs. resources, schools]

Given the foregoing we respectfully demand the City take the following actions:

1. Void the actions taken by the Planning Commission regarding the PSH Ordinance and associated environment documents
2. Prepare an EIR to address the potential impacts of the full range of the City's efforts to provide housing for homeless persons in the City
3. The EIR should include an analysis of the growth-inducing impacts of the production of housing for homeless persons
4. Comply with CEQA-mandated process requirements.

Thank you.

Louise Brady

loulou111@mac.com

829 Oxford Ave

[Marina Del Rey, California 90292](#)



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

1 message

Kristin Bogart <kb209@earthlink.net>

Wed, Mar 14, 2018 at 6:21 PM

Reply-To: kb209@earthlink.net

To: cally.hardy@lacity.org

Cally Hardy,

Is there a homeless crisis in Los Angeles? Absolutely, this fact is not disputable. That said, state and local safeguards which have protected citizens and the environment for over 40 years were enacted for good reason. In a time of crisis, these rules cannot be pushed aside. To do so backslides on 40 years of environmental progress and ignores the rights of impacted parties.

We live in District 11, in an area commonly known as the Oxford Triangle. Our properties are bounded by Lincoln Blvd. to the east, Washington Blvd. to the north and Admiralty to the southwest. We strongly object and bring to your attention failure to adhere to the CEQA process.

We have repeatedly pointed out a number of serious defects in the City's process, including the failure to circulate the Mitigated Negative Declaration ["MND"] for the required 30-day period. The re-circulated MND does not respond to, nor does it address, any of the public comments received during the MND's initial and inadequate 21-day comment period. All letters received during both the current comment period and also the original 21-day comment period must, by operation of law, be presented to the City Council Planning and Land Use ["PLUM"] committee, along with responses to said comments. You should be clear, as are we, that recirculation of the MND only addressed two of the many failings of the City's process.

We are not asking for special consideration. Rather, we are demanding that our rights be acknowledged and not quashed in the City's attempt to address the homeless issue.

We have taken the step of retaining counsel, Channel Law, to represent us. While this was not something we wanted to do, the actions and deliberate steps taken by the City, in its various capacities, left us with no other alternative.

Here are some, but not all of the issues we have identified to date:

1. The City conducted public hearings and ended the comment period on the ordinance on October 30, 2017, prior to the release of the MND
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3. The Planning Commission took action on the project on December 14, 2017 prior to the close of the MND comment period on December 20, 2017

4. The City has demonstrated failure to address Channel Law's December 20, 2017 comments regarding procedural and substantive defects in the November 27, 2017 MND circulated for Public Review and Comment from November 30, 2017 to December 20, 2017 and the associated process
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Given the foregoing we respectfully demand the City take the following actions:

1. Void the actions taken by the Planning Commission regarding the PSH Ordinance and associated environment documents
2. Prepare an EIR to address the potential impacts of the full range of the City's efforts to provide housing for homeless persons in the City
3. The EIR should include an analysis of the growth-inducing impacts of the production of housing for homeless persons
4. Comply with CEQA-mandated process requirements.

Thank you.

Kristin Bogart

kb209@earthlink.net

3213 Thatcher Ave

[Marina Del Rey, California 90292](#)



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

1 message

Simon Gabriel <simongabriel@icloud.com>

Wed, Mar 14, 2018 at 8:31 PM

Reply-To: simongabriel@icloud.com

To: cally.hardy@lacity.org

Cally Hardy,

Is there a homeless crisis in Los Angeles? For sure there is, this fact is not in question. However, State and local safeguards which have protected citizens and the environment for over 40 years are in place for very good and rationale reasons. A crisis of homelessness does not mean that those reasons no longer exist. In a time of crisis, rules that protect the environment and those that live in it cannot be pushed aside as an inconvenience, they must be observed and protected. To do otherwise backslides on 40 years of environmental progresses and ignores the rights of impacted parties, citizens and property owners, alike, throughout Los Angeles.

We live in District 11, in an area commonly known as the Oxford Triangle. Our properties are bounded by Lincoln Blvd. to the east, Washington Blvd. to the north and Admiralty to the southwest. We strongly object and bring to your attention the breach that is taking place in full view of the City's obligation to adhere to the CEQA process regarding the Permanent Supportive Housing Ordinance.

We have repeatedly pointed out a number of serious defects in the City's process, including the failure to circulate the Mitigated Negative Declaration ["MND"] for the required 30-day period. The re-circulated MND does not respond to, nor does it address, any of the public comments received during the MND's initial and inadequate 21-day comment period. All letters received during both the current comment period and also the original 21-day comment period must, by operation of law, be presented to the City Council Planning and Land Use ["PLUM"] committee, along with responses to said comments. You should be clear, as are we, that recirculation of the MND only addressed two of the many failing of the City's process.

We are not asking for special consideration. Rather, we are demanding that our rights be acknowledged and not quashed in the City's attempt to right a serious issue.

We have taken the step of retaining counsel, Channel Law, to represent us. While this was not something we wanted to do, the actions and deliberate steps taken by the City, in its various capacities, left us with no other alternative.

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3. The EIR should include an analysis of the growth-inducing impacts of the production of housing for homeless persons
4. Comply with CEQA-mandated process requirements.

Thank you.

Simon Gabriel
1038 Berkeley Dr.

Simon Gabriel
simongabriel@icloud.com
1038 Berkeley Dr.
Marina del Ray, California 90292



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

1 message

Taleen Gabriel <taleen@jimandjacks.com>

Wed, Mar 14, 2018 at 8:59 PM

Reply-To: taleen@jimandjacks.com

To: cally.hardy@lacity.org

Cally Hardy,

Is there a homeless crisis in Los Angeles? For sure there is, this fact is not in question. However, State and local safeguards which have protected citizens and the environment for over 40 years are in place for very good and rationale reasons. A crisis of homelessness does not mean that those reasons no longer exist. In a time of crisis, rules that protect the environment and those that live in it cannot be pushed aside as an inconvenience, they must be observed and protected. To do otherwise backslides on 40 years of environmental progresses and ignores the rights of impacted parties, citizens and property owners, alike, throughout Los Angeles.

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We have repeatedly pointed out a number of serious defects in the City's process, including the failure to circulate the Mitigated Negative Declaration ["MND"] for the required 30-day period. The re-circulated MND does not respond to, nor does it address, any of the public comments received during the MND's initial and inadequate 21-day comment period. All letters received during both the current comment period and also the original 21-day comment period must, by operation of law, be presented to the City Council Planning and Land Use ["PLUM"] committee, along with responses to said comments. You should be clear, as are we, that recirculation of the MND only addressed two of the many failing of the City's process.

We are not asking for special consideration. Rather, we are demanding that our rights be acknowledged and not quashed in the City's attempt to right a serious issue.

We have taken the step of retaining counsel, Channel Law, to represent us. While this was not something we wanted to do, the actions and deliberate steps taken by the City, in its various capacities, left us with no other alternative.

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Given the foregoing we respectfully demand the City take the following actions:

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4. Comply with CEQA-mandated process requirements.

Thank you.

Taleen Gabriel
taleen@jimandjacks.com

Marina Del Rey, California 90292



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

1 message

David Karlsberg <dk@davidkarlsberg.com>

Wed, Mar 14, 2018 at 9:03 PM

Reply-To: dk@davidkarlsberg.com

To: cally.hardy@lacity.org

Cally Hardy,

Is there a homeless crisis in Los Angeles? For sure there is, this fact is not in question. However, State and local safeguards which have protected citizens and the environment for over 40 years are in place for very good and rationale reasons. A crisis of homelessness does not mean that those reasons no longer exist. In a time of crisis, rules that protect the environment and those that live in it cannot be pushed aside as an inconvenience, they must be observed and protected. To do otherwise backslides on 40 years of environmental progresses and ignores the rights of impacted parties, citizens and property owners, alike, throughout Los Angeles.

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1. Void the actions taken by the Planning Commission regarding the PSH Ordinance and associated environment documents
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3. The EIR should include an analysis of the growth-inducing impacts of the production of housing for homeless persons
4. Comply with CEQA-mandated process requirements.

Thank you.

David Karlsberg

dk@davidkarlsberg.com

739 oxford ave

[Los Angeles, California 90292](#)



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

1 message

Anita DAUENHAUER <ABARTI@gmail.com>

Wed, Mar 14, 2018 at 9:36 PM

Reply-To: ABARTI@gmail.com

To: cally.hardy@lacity.org

Cally Hardy,

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4. Comply with CEQA-mandated process requirements.

Thank you.

Anita DAUENHAUER
ABARTI@GMAIL.COM
2916 Thatcher Avenue
[Marina del Rey, California 90292](#)



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

1 message

Ken Englert <maritime@maritimecomm.com>
Reply-To: maritime@maritimecomm.com
To: cally.hardy@lacity.org

Thu, Mar 15, 2018 at 7:41 AM

Cally Hardy,

Is there a homeless crisis in Los Angeles? For sure there is, this fact is not in question. However, State and local safeguards which have protected citizens and the environment for over 40 years are in place for very good and rationale reasons. A crisis of homelessness does not mean that those reasons no longer exist. In a time of crisis, rules that protect the environment and those that live in it cannot be pushed aside as an inconvenience, they must be observed and protected. To do otherwise backslides on 40 years of environmental progresses and ignores the rights of impacted parties, citizens and property owners, alike, throughout Los Angeles.

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4. Comply with CEQA-mandated process requirements.

Thank you.

Ken Englert
maritime@maritimecomm.com
1263 Warner Ave
Los Angeles, California 90292



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

1 message

Daniel Whalen <whalen@ca.r.com>

Thu, Mar 15, 2018 at 2:41 PM

Reply-To: whalen@ca.r.com

To: cally.hardy@lacity.org

Cally Hardy,

Is there a homeless crisis in Los Angeles? For sure there is, this fact is not in question. However, State and local safeguards which have protected citizens and the environment for over 40 years are in place for very good and rationale reasons. A crisis of homelessness does not mean that those reasons no longer exist. In a time of crisis, rules that protect the environment and those that live in it cannot be pushed aside as an inconvenience, they must be observed and protected. To do otherwise backslides on 40 years of environmental progresses and ignores the rights of impacted parties, citizens and property owners, alike, throughout Los Angeles.

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4. Comply with CEQA-mandated process requirements.

Thank you.

Daniel Whalen
whalen@ca.r.com

Marina Del Rey, California 90292



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

1 message

Angela McGregor <info@actionnetwork.org>
Reply-To: angusmcg1961@gmail.com
To: cally.hardy@lacity.org

Sat, Mar 17, 2018 at 9:56 AM

Cally Hardy,

Is there a homeless crisis in Los Angeles? For sure there is, this fact is not in question. However, State and local safeguards which have protected citizens and the environment for over 40 years are in place for very good and rationale reasons. A crisis of homelessness does not mean that those reasons no longer exist. In a time of crisis, rules that protect the environment and those that live in it cannot be pushed aside as an inconvenience, they must be observed and protected. To do otherwise backslides on 40 years of environmental progresses and ignores the rights of impacted parties, citizens and property owners, alike, throughout Los Angeles.

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Angela McGregor

angusmcg1961@gmail.com

3107 Thatcher Avenue

[Los Angeles, California 90292](#)



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

1 message

Richard Corben <info@actionnetwork.org>
Reply-To: rcorben@gmail.com
To: cally.hardy@lacity.org

Sat, Mar 17, 2018 at 11:11 PM

Cally Hardy,

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Richard Corben

rcorben@gmail.com

13650 Marina Point Dr., Unit 705

[Marina del Rey, California 90292](#)



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

1 message

David Shall <davidshall@sbcglobal.net>

Sun, Mar 18, 2018 at 10:36 AM

Reply-To: davidshall@sbcglobal.net

To: cally.hardy@lacity.org

Cally Hardy,

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Thank you.

David Shall

davidshall@sbcglobal.net

13650 Marina Pointe Dr, Unit 307

[Marina del Rey, California 90292](#)



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

1 message

Bernadette Lee <bernadette.lee@ggp.com>

Sun, Mar 18, 2018 at 11:42 AM

Reply-To: bernadette.lee@ggp.com

To: cally.hardy@lacity.org

Cally Hardy,

We have a homeless couple sleeping behind an alleyway a couple blocks from our house. The homeless crisis in Los Angeles did not develop over the last few years. However, State and local safeguards which have protected citizens and the environment for over 40 years are in place for very good and rationale reasons. A crisis of homelessness does not mean that those reasons no longer exist. In a time of crisis, rules that protect the environment and those that live in it cannot be pushed aside as an inconvenience, they must be observed and protected. To do otherwise backslides on 40 years of environmental progresses and ignores the rights of impacted parties, citizens and property owners, alike, throughout Los Angeles.

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Bernadette Lee

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bernadette.lee@ggp.com

843 Oxford Ave.

[Marina del Rey, California 90292](#)



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

1 message

Steven Mandel <info@actionnetwork.org>
Reply-To: mandel.steven@gmail.com
To: cally.hardy@lacity.org

Sun, Mar 18, 2018 at 5:08 PM

Cally Hardy,

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4. Comply with CEQA-mandated process requirements.

Thank you.

Steven Mandel

mandel.steven@gmail.com

928 harbor Crossing Lane

[Marina Del Rey, California 90292](#)



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

1 message

Richard Charnley <rlc@charnleyrian.com>

Sun, Mar 18, 2018 at 9:32 PM

Reply-To: rlc@charnleyrian.com

To: cally.hardy@lacity.org

Cally Hardy,

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Thank you.

Richard Charnley

Richard Charnley

rlc@charnleyrian.com

932 Dickson Street

[Marina del Rey, California 90292](#)



Cally Hardy <cally.hardy@lacity.org>

PSH Ordinance and Mitigated Negative Declaration actions

4 messages

Bridget Rohmer <info@actionnetwork.org>
Reply-To: bridgetrohmer@gmail.com
To: cally.hardy@lacity.org

Mon, Mar 19, 2018 at 3:17 PM

Cally Hardy,

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Thank you.

Bridget Rohmer
bridgetrohmer@gmail.com

Marina Del Rey, California 90292

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Thank you.

Mary Anne Christensen
mawcdk@gmail.com
13700 Marina Pointe Dr #1416
[Marina del Rey, California 90292](#)

Ferrell McDonald <info@actionnetwork.org>
Reply-To: efmcdonald@yahoo.com
To: cally.hardy@lacity.org

Tue, Mar 20, 2018 at 11:54 AM

Cally Hardy,

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Ferrell McDonald
efmcdonald@yahoo.com
948 Princeton Dr.
[Marina del Rey, California 90292](#)

Nashir Hirjee <info@actionnetwork.org>
Reply-To: nashdfw@yahoo.com
To: cally.hardy@lacity.org

Tue, Mar 20, 2018 at 2:20 PM

Cally Hardy,

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Nashir Hirjee

nashdfw@yahoo.com

13700 Marina Pointe Drive Unit 1412

[Marina del Rey, California 90292](#)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

Letter 104

DATE: December 26, 2017

TO: Vincent P. Bertoni, Director of Planning
Department of City Planning

Attn: Cally Hardy, City Planning Associate
Environmental Review Section
Department of City Planning

FROM: Ali Poosti, Division Manager
Wastewater Engineering Services Division
LA Sanitation



SUBJECT: PERMANENT SUPPORTIVE HOUSING ORDINANCE – NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION

This is in response to your November 27, 2017 Notice of Intent to Adopt a Mitigated Negative Declaration for the Permanent Supportive Housing Ordinance. LA Sanitation, Wastewater Engineering Services Division has received and logged the notification. Upon review, it has been determined that the project is unrelated to wastewater conveyance and does not require any hydraulic analysis. Please notify our office in the instance that additional environmental review is necessary for this project.

If you have any questions, please call Christopher DeMonbrun at (323) 342-1567 or email at chris.demonbrun@lacity.org

CD/AP:al

c: Kosta Kaporis, LASAN
Abdulsamad Danishwar, LASAN
Christopher DeMonbrun, LASAN



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

February 13, 2018

Cally Hardy
City of Los Angeles
200 N. Spring Street, Room 278
Los Angeles, CA 90012

Subject: Permanent Supportive Housing Ordinance (CPC-2017-3136-CA)
SCH#: 2018011017

Dear Cally Hardy:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. The review period closed on February 12, 2018, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Morgan".

Scott Morgan
Director, State Clearinghouse

**Document Details Report
State Clearinghouse Data Base**

SCH# 2018011017
Project Title Permanent Supportive Housing Ordinance (CPC-2017-3136-CA)
Lead Agency Los Angeles, City of

Type MND Mitigated Negative Declaration

Description An ordinance amending sections 12.03, 12.04.09, 14.00 and 16.05 of the LA Municipal code establishing regulations to facilitate the production of permanent supportive housing, including adopting regulations that define PSH & Project eligibility criteria, establish unique development standards for PSH, and facilities administrative review & approval, as well as modify certain provisions related to height & density, consistent with state density bonus law. The PSH Ordinance would allow for projects to select concessions with respect to zoning code, including up to 20% increase in required setbacks, up to 20% reduction in required open space, up to a 35% increase in height or one additional story. Additional design requirements include that when adjacent to or across an alley.

Lead Agency Contact

Name Cally Hardy
Agency City of Los Angeles
Phone (213) 978-1643 **Fax**
email
Address 200 N. Spring Street, Room 278
City Los Angeles **State** CA **Zip** 90012

Project Location

County Los Angeles
City Los Angeles, City of
Region
Lat / Long
Cross Streets
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways
Airports
Railways
Waterways
Schools
Land Use

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Geologic/Seismic; Landuse; Minerals; Noise; Other Issues; Population/Housing Balance; Public Services; Recreation/Parks; Septic System; Sewer Capacity; Toxic/Hazardous; Traffic/Circulation; Tribal Cultural Resources; Water Quality

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Cal Fire; Department of Parks and Recreation; Department of Water Resources; Caltrans, District 7; Office of Emergency Services, California; Department of Housing and Community Development; Regional Water Quality Control Board, Region 4; Native American Heritage Commission

Date Received 01/12/2018 **Start of Review** 01/12/2018 **End of Review** 02/12/2018