



**APPLICATIONS:**

**Related Code Section:** The Los Angeles Municipal Code (LAMC) Section 11.5.13 (Ord. No. 186,338) established the appeal procedure to the City Council for California Environmental Quality Act (CEQA) determinations.

**Purpose:** *The Appeal* - A CEQA clearance can only be appealed if a non-elected decision-making body (ZA, APC, CPC, DIR) makes a determination for a project that is not further appealable. To initiate appeal of a CEQA document this form must be completely filled out with the required materials attached and filed within 15 calendar days from the final administrative decision, of the entitlement application.

**General Information**

Appealable CEQA documents:

- Certified Environmental Impact Report (EIR)
- Statutory Communities Environmental Assessment (SCEA)
- Mitigated Negative Declaration (MND)
- Negative Declaration (ND)
- Categorical Exemption (CE) determination
- Statutory Exemption (SE) determination

**NOTE:**

- Actions not appealable include an addendum, findings made pursuant to CEQA Guidelines Section 15162, or a determination that an action does not constitute a project under CEQA.
- All CEQA appeals are heard by the City Council.

This form is only for the appeal of Department of City Planning determinations: All other CEQA appeals are filed with the City Clerk pursuant to the LAMC Section 197.01.

A Certified Neighborhood Council (CNC) or a person identified as a member of a CNC or as representing the CNC may not file an appeal on behalf of the Neighborhood Council; persons affiliated with a CNC may only file as an individual on behalf of self.

**1. Case Information**

Environmental Case Number: ENV-2019-4093-CE

Related Entitlement Case Number(s): DIR-2019-4090-TOC

Project Address: 719 South Hoover Street & 2801 West Leeward Avenue

Date of Final Entitlement Determination: 03/19/2020

The CEQA Clearance being appealed is a(n):

- EIR     
  SCEA     
  MND     
  ND     
  CE     
  SC

**2. Appellant Identity** (check all that apply)

- Representative     
  Property Owner     
  Other Person  
 Applicant     
  Operator of the Use/Site

**3. Appellant Information**

Appellant Name: Margarita Lopez

Company/Organization: Coalition For An Equitable Westlake/Macarthur Park

Mailing Address: 811 Wilshire Blvd., 17th Floor

City: Los Angeles State: CA Zip: 90017

Telephone: (213) 269-4001 E-mail: \_\_\_\_\_

a. Is the appeal being filed on your behalf or on behalf of another party, organization or company?  
 Self       Other: Coalition For An Equitable Westlake/Macarthur Park

b. Is the appeal being filed to support the original applicant's position?       Yes       No

**4. Representative/Agent Information**

Representative/Agent name (if applicable): Claudia Medina  
 Company: Law Office of Claudia Medina  
 Mailing Address: 811 Wilshire Blvd., 17th Floor  
 City: Los Angeles State: CA Zip: 90017  
 Telephone: (213) 269-4001 E-mail: claudia@cmedinalawoffice.com

**5. Appeal Justification**

Attach a separate sheet providing your specific reasons for the appeal. Your reasons must state how you believe CEQA was incorrectly applied, providing a legal basis for the appeal.

**6. Applicant's Affidavit**

I certify that the statements contained in this application are complete and true:

Appellant Signature:  Date: 03-09-2020

**ENVIRONMENTAL APPEAL FILING REQUIREMENTS**

Note: City Clerk prepares mailing list for CEQA appeals per LAMC Section 11.5.13 E.

**1. Three (3) sets** - The following documents are required for each appeal filed (1 original and 2 duplicates) Each case being appealed is required to provide three (3) sets of the listed documents.

- Environmental Appeal Application (form CP-7840)
- Justification/Reason for Appeal
- Copies of the written Determination Letter, from the final appellate body, which must be a non-elected decision-making body

**2. Electronic Copy**

- Provide an electronic copy of your appeal documents on a flash drive (planning staff will upload materials during filing and return the flash drive to you) or a CD (which will remain in the file). The following items must be saved as individual PDFs and labeled accordingly (e.g. "Environmental Appeal Application.pdf", "Justification/Reason Statement.pdf", "Final Determination Letter.pdf"). No file should exceed 9.8 MB in size.

**3. Appeal Fee**

- Original Applicant - A fee equal to 85% of the original application fee of the Environmental case; provide a copy of the original application receipt(s) to calculate the fee per LAMC Section 19.01B 1.
- Other Persons - The fee charged shall be in accordance with the LAMC Section 19.01B 1.

This Section for City Planning Staff Use Only		
Base Fee:	Reviewed & Accepted by (DSC Planner):	Date:
Receipt No:	Deemed Complete by (Project Planner):	Date:
<input type="checkbox"/> Determination authority notified		<input type="checkbox"/> Original receipt and BTC receipt (if original applicant)

March 31, 2020

**Justifications for Appeal**

Re: Case Nos. CEQA No. ENV-2019-4093-CE; DIR-2019-4090-TOC  
Project Location: 719 South Hoover Street & 2801 West Leeward Avenue (“the Project”)

On behalf of Coalition for an Equitable Westlake/Macarthur Park, an unincorporated association of long-time community residents, we are writing to object to the above referenced Project Determination, and corresponding CEQA exemption determination for the reason stated below.

A project qualifies for a Class 32 Categorical Exemption if it is developed on an infill site and meets certain criteria. Additionally, before a project can be determined to qualify for a categorical CEQA exemption, exceptions to the exemption, such as cumulative impacts, must be considered. If an exception to a categorical exemption applies, CEQA review in the form of an MND or EIR must be conducted. The CEQA notice of exemption states that there are no known succession of projects of the same type and in the same place as the known project. However, this is incorrect. For example, within a one mile radius of the Project, the following projects have either been proposed, approved, are in the pipeline in some way.

- 1930 Wilshire Blvd at Westlake: construction of 478 residential units and a 220 room hotel
- 2001 W. Olympic at Alvarado: construction of 150 room hotel (.7 miles)
- 933 S. Park View: construction of a 22 condominium unit (1 mile)
- 714 S. Grand View Street: construction of 100 residential units (.6 miles)
- 823 S. Coronado Street: construction of 77 residential dwellings (1 mile)
- 1600 W. Wilshire Blvd: construction of 85 residential units
- 831 S. Westlake: construction of 79 residential units (.6)
- 719 S. Hoover: construction of 38 condominium units ( 1 mile)
- 827 S. Grand View: construction of 60 residential units (.8 miles)
- 2250 W. Pico Blvd.: construction of a 125 room hotel. (1.3 miles)
- 619 S. Westlake: construction of 78 residential, affordable units (.3 miles)
- 971 S. Hoover: construction of 39 residential apartments (1.1 miles)
- 2525 Wilshire Blvd at Coronado: construction of 152 residential units (.7 miles)
- 2500 Wilshire Blvd. at Coronado: construction of 248 residential units (.7 miles)
- 2806 7<sup>th</sup> St. at Hoover: construction of 158 residential units (1 mile)
- 2902-2908 Wilshire at Hoover: construction of 644 residential units (.9 miles)
- 2801 Park View at 8<sup>th</sup> Street: 144 residential units (.6 miles)
- 2501-2515 Olympic Blvd. at Hoover: construction of 173 residential units (1.1 miles)
- 668 Coronado: construction of 122 residential units.
- 2108 W. 8<sup>th</sup> Street

CEQA Guidelines section 15355 states: “Cumulative impacts refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” The importance of evaluating cumulative impacts of this project is high, given that the amount of projects being proposed for the area in such a short amount of time. For the reasons set forth in this letter, we urge the City to require the preparation of an environmental review document to analyze the potential cumulative impacts of the Project.