

April 17, 2023

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

Re: Case Nos. CEQA No. ENV-2021-644-CE; DIR-2021-643-TOC-HCA  
Project Location: 1537,1539,1541,1543 West Cambria Street (“the Project”)

Dear Los Angeles City Council:

I am writing to object to the City’s CEQA determination. A project qualifies for a Class 32 Categorical Exemption if it is developed on an infill site and meets certain criteria. However, 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. 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 City has a burden to provide substantial evidence, which must be based upon facts, reasonable assumptions based on facts and expert opinion, rather than the City’s mere speculation, to support its findings. CEQA Guidelines § 15384(a); *Save Our Big Trees v. City of Santa Cruz* (2015) 241 Cal. App. 4th 694, 711 (citing *Muzzy Ranch Co. v. Solano County Airport Land Use Com.* (2007) 41 Cal. 4th 372, 386). The City must demonstrate with substantial evidence that the Project would not result in significant environmental impacts pursuant to CEQA Guidelines § 15332

Additionally, any environmental impacts based on pre-Covid levels of public transit ridership that do not take into account declining public ridership, which is expected to further decline now after Covid emergency. <https://caltransit.org/news-publications/publications/transit-california/transit-california-archives/2019-editions/may/ridership-study-revisited>; <https://www.latimes.com/opinion/story/2021-04-07/los-angeles-public-transit-crisis>

Below I submit a list of past projects, current projects and future projects spanning back to January 1, 2017 that contribute towards the cumulative impacts of the Project that must be considered. The projects listed below are all within a .07 mile radius of the Project. Many have already been approved. The area within a .07 mile radius is heavily populated and is a high pedestrian and car traffic area.

The projects are listed by the address of the development, the distance from the project, the number of existing units, the number of units being constructed, the number of increased units per project and City Planning Departments assigned case number. Please see below.

### 1537 Cambria St. (43 units)

	<i>Address of proposed projects</i>	<i>Dist.</i>	<i>Existing</i>	<i>Proposed</i>	<i>Increase</i>	<i>Case No.</i>
1	451 S BONNIE BRAE ST	.7 Mile	4 units	26 Units	22 Units	DIR-2016-4972-DB
2	452 S BONNIE BRAE ST	.7 Mile	8 Units	30 Units	22 Units	DIR-2019-3222-TOC
3	500 S UNION AVE	.5 Mile	16 Units	85 Units	69 Units	DIR-2020-1867-TOC-SPR-HCA
4	1247 W 7TH ST	.3 Mile	None	304 Units	304 Units	ENV-2006-8586-MND-REC2
5	2005 W JAMES M. WOOD BLVD	.5 Mile	9 Units	100 Units	91 Units	CPC-2017-712-GPA-VZC-HD-VCU-SPR
6	1324 W WILSHIRE BLVD	.4 Mile	None	50 Units	50 Units	DIR-2017-1816-SPP
7	1600 W WILSHIRE BLVD	.2 Mile	12 Units	85 Units	73 Units	DIR-2019-2614-SPR
8	2001 W OLYMPIC BLVD	.6 Mile	None	150 rooms	150 Units	CPC-2017-4853-GPA-VZC-HD-CU-CUB-SPR
9	1925 W OLYMPIC BLVD	.6 Mile	None	238 Units	238 Units	DIR-2022-5371-TOC-SPR-HCA
10	1659 W 11TH ST	.6 Mile	None	5 Units	5 Units	DIR-2018-2578-CCMP
11	831 S WESTLAKE AVE	.5 Mile	17 Units	79 Units	62 Units	DIR-2019-2893-TOC
12	437 S WESTLAKE AVE	.7 Mile	None	63 Units	63 Units	ENV-2021-1315-EAF
13	2101 W 8TH ST	.5 Mile	None	57 Units	57 Units	DIR-2019-1663-TOC

14	1517 W 8TH ST	.2 Mile	None	60 Units	60 Units	DIR-2019-7742-TOC
15	905 S. BEACON	.3 Mile	None	145 Units	145 Units	DIR-2020-7604-SPR-TOC-HCA
16	918 S ALBANY ST	.5 Mile	None	23 Units	23 Units	DIR-2022-2074-TOC-SPP-HCA
17	1540 W 6TH ST	.3 Mile	1 unit	38 Units	37 Units	DIR-2022-5869-TOC-SPP-VHCA
18	1717 W. 6 <sup>th</sup> St.	.4 Mile	None	100 Units	100 Units	DIR-2021-7344-TOC-SPR-HCA
	<b>totals</b>	.7 miles	<b><u>Existing</u></b> 67 units	<b><u>Proposed</u></b> 1,648 units	<b><u>Increase</u></b> 1,581 units	<b>Note:</b> If we add the 43 units under the proposed project in question, then we get a <b>net increase of 1,624 new units</b> concentrated within .7 miles in this constantly gentrifying neighborhood. These new market rate units are not for low-income people who already live here. Longtime residents from this neighborhood cannot afford these units; new people with more money will move into them accelerating the gentrifying process going on in this neighborhood.