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May 7, 2025

Los Angeles City Council
c/o Office of the City Clerk
City Hall, Room 395
Los Angeles, California 90012

Attention: PLUM Committee

Dear Honorable Members:

APPEAL SUMMARY AND STAFF RESPONSE; 6136 WEST MANCHESTER AVENUE; 8651 SOUTH LA TIJERA BOULEVARD; CPC-2022-6064-DB-MCUP-CDO-SPR-HCA-PHP; CF 25-0287.

Project Background

The project involves the demolition of existing structures and the construction, use, and maintenance of a new 416,915-square-foot mixed-use building comprised of 489 residential units, including six (6) live-work units and 64 dwelling units set aside for Very Low-Income Households, and 16,120 square feet of ground-floor commercial space. The proposed uses would be located within an eight-story building with a maximum height of 96 feet and a 4:1 floor area ratio (FAR). The project would provide 549 vehicular parking spaces that would be located within two (2) subterranean parking levels. In addition, the project would include approximately 51,385 square feet of open space, including 43,235 square feet of common open space and 8,150 square feet of private open space.

At its meeting on February 13, 2025, the City Planning Commission approved the requested Density Bonus, Main Conditional Use Permit, Community Design Overlay, and Site Plan Review under Case No. CPC-2022-6064-DB-MCUP-CDO-SPR-HCA-PHP. The City Planning Commission also adopted the associated Sustainable Communities Environmental Assessment, under Case No. ENV-2022-6065-SCEA, and the corresponding Mitigation Monitoring Program. The Letter of Determination was issued on February 21, 2025, which established an appeal period until March 10, 2025.

On February 25, 2025, within the required 15-day appeal period, an appeal was filed by Supporters Alliance for Environmental Responsibility ("SAFER") for part of the City Planning Commission's determination, as filed under Council File No. 25-028. The instant appeal justification included points raised by SAFER prior to the City Planning Commission meeting and included the letter that was submitted to the City Planning Commission.

Staff Recommendation

Staff recommends that the PLUM Committee recommend for Council Action to deny the submitted appeal and sustain the City Planning Commission's determination which approved the affordable housing project. Based on the whole of the administrative record, there is substantial evidence to make all required findings related to the requested Density Bonus, Main Conditional Use Permit, Community Design Overlay, and Site Plan Review and find that the project has been adequately assessed under ENV-2022-6065-SCEA.

Appeal Summary

The following appeal statements have been compiled and summarized from the submitted appeal and responded to below.

1. Appeal Point:

The City may not rely on the SCEA because the project is not consistent with the General Plan. The project is not eligible to utilize a SCEA because the increase in FAR is inconsistent with the City's Zoning requirements and the General Plan.

Staff Response:

General Plan consistency is not the proper criterion for determining a project's eligibility to utilize a SCEA. Rather, the project must be consistent with the Regional Transportation Plan/Sustainable Communities Strategy ("RTP/SCS") prepared by the Southern California Association of Governments ("SCAG"). As set forth by the SCEA and supported by substantial evidence, the project is fully consistent with the general use designation, density, building intensity, and applicable policies of the RTP/SCS. Furthermore, although not required as a criterion for utilization of a SCEA, the project is also consistent with the applicable General Plan regulations for the Site. According to State Density Bonus law, the receipt of density bonus incentives, such as an increase in the FAR, as well as waivers from development standards do not result in any inconsistency with local planning and zoning regulations (see Government Code Sections 65915(f)(5) and 65915(j)(1)). Therefore, this claim by the Appellant has no merit.

2. Appeal Point:

The project will result in significant impacts to air quality not addressed in the Sustainable Communities Strategy. The project is likely to have significant air quality impacts because the SCEA failed to address and mitigate potentially significant human health impacts from indoor emissions of formaldehyde.

Staff Response:

The SCEA provides substantial evidence that the project would result in less than significant air quality impacts. In addition, as demonstrated by the Air Quality and Greenhouse Gas Emissions supplemental technical reports prepared by Eyestone Environmental, LLC, dated August 2024, and included as part of the case file, no potential health-related air quality impacts would occur in connection with the construction or operation of the project. These claims presented in the appeal justification, are the same claims which has already been fully rebutted with substantial evidence which is included in the case file. Specifically, SAFER submitted the exact same formaldehyde-related objections in a comment letter for the SCEA in that was circulated in August 2023. Those comments were reviewed and fully responded to by the Project's expert CEQA and air quality consultants in the cumulative responses to all public comments received regarding both versions of the SCEA. The subject Appeal provides no new arguments and simply states: "For the specific reasons set forth in the attached comment letter dated February 11, 2025, the Project is not eligible for a SCEA because the Project is not consistent with the applicable standards for the Project area and the Project fails

to mitigate potentially significant air quality impacts that were not mitigated to a level of insignificance in the Connect SoCal Sustainable Communities Strategy ("SCS")." On February 13, 2025, after consideration of all of the evidence in the record, including all comments and letters received from the Appellant as well as correspondence from the Applicant responding to the Appellant's objections (all letters are included in the case file), the CPC granted approval of the project and its SCEA. The Appellant's objections regarding the project and the SCEA are not supported by substantial evidence and do not demonstrate any deficiency in the SCEA's environmental review of the Project. Accordingly, the Appellant has not met their burden of proof and their claim lacks merit.

Conclusion

Based on the information in the record and after consideration of the appellant's arguments for the appeal, Staff concurs with the determination by the City Planning Commission which found that the project complied with all requirements under the Los Angeles Municipal Code and CEQA and that there is no substantial evidence that the project would result in a significant effect on the environment. Therefore, it is recommended that the PLUM Committee deny the appeal and affirm that the project is compliant with the Los Angeles Municipal Code, State Density Bonus law, and CEQA.

Sincerely,

VINCENT P. BERTONI, AICP
Director of Planning



Michelle Carter
City Planner

VPB:HB:MC