



November 29, 2024

City of Los Angeles  
Planning and Land Use Management Committee  
200 N Spring Street  
Los Angeles CA, 90012

RE: Council File 23-0796-ST-ENV2022-CE6190  
3601-3615 Mission Road & 2010-2036 Lincoln Park Ave  
Related approved entitlement CPC-2022-6189-CU-DB-ZAA-SPR-HCH

At its meeting of May 25, 2023, the Los Angeles City Planning Commission ("CPC") approved a Conditional Use Permit, Density Bonus Compliance Review, Zoning Administrator's Adjustment, and Site Plan Review to permit a housing development project consisting of 184 dwelling units with 47 units reserved for Very Low-Income Households at the Property (the "Project"). The CPC also found that the Project qualifies for a Class 32 Categorical Exemption under CEQA as an infill development. The CPC's Letter of Determination was issued on June 20, 2023, and the present appeals were filed on June 29, 2023 – nearly 15 months ago.

At the request of the Council Office, the Applicant agreed to extend the initial 75-day period to act on the appeals of the underlying entitlements – which would have expired on September 12, 2023 – to October 25, 2023. The initial hearing before this Committee was scheduled for October 3, 2023. On that date, the hearing was continued to October 17, 2023. On October 17, 2023, this Committee did not take any action, and on October 25, 2023, the Council lost jurisdiction to act on the appeals of the underlying entitlements due to a failure to act timely.

Because the City's Municipal Code does not provide a jurisdictional time limitation within which the Council must act on CEQA appeals, the CEQA appeals have remained pending since that time.

Prior to filing this Case there was plenty of outreach with the neighboring community stakeholders, the Chamber of Commerce, and Lincoln Heights Neighborhood Council. These meetings had a very positive impact on the design of the development, and all community leaders were updated continuously throughout the process. There have been 2 in-person and 11 phone meetings with Gerald Gubatan of Council District 14 and numerous calls with Kevin Keller at Mayor Bass's Office.

On June 20, 2023 the Letter of Determination was published, approving CPC-2022-6189-CU-DB-ZAA-SPR-HCA-CEQA and ENV-2022-6189-CE. The Area Planning Commission was unanimous.



The entire Case was appealed in June of 2023. However, PLUM sent the Case to City Council, which did not act in the time frame required; thus, the entitlement was stayed and active. The Appellants then continued the and appealed CEQA ENV-2022-6189-CE. Today this portion of the Case is still pending hearings at PLUM and City Council.

Mixed-income housing contributes to the well-being of communities and individuals. Mixed-income development fosters inclusivity, economic resilience, and creates healthier, more vibrant neighborhoods. As stated by the letters of support from housing research experts, housing prices in LA are not increasing because of new housing being built, they're increasing because we're not building enough new housing to absorb growing demand. Neighborhoods like Echo Park and Venice show that a lack of new housing development amid growing demand from higher-income residents leads to the displacement of legacy community members. Underbuilding housing does not protect low-income communities. It hurts them.

The Applicant's team reached out to staff at Council District 14 on numerous occasions between the end of 2023 and early August 2024 to determine what concerns the office had with the Project's environmental impacts so that it could address them and move the Project forward to a hearing on the CEQA appeals. However, Council District 14 failed to respond in any manner to the Applicant's request for direction on this issue. As such, when the matter was finally scheduled for hearing on August 6, 2024, the Applicant was surprised and at the same time somewhat relieved, to hear that a voluntary Phase 2 was being requested to address community concerns regarding soil contamination. The Applicant believed that the endless delays could finally be concluded and commissioned the report to be completed in time for the September 17, 2024 continued hearing date.

To date, we have been to City Council Planning and Land Use Committee 5 times between October 2023 and November 2024 and heard at LA City Council once during the same period of time. During this time frame, Council Member De Leon had 3 meetings with the Appellants. Representatives of Supporters Alliance for Environmental Responsibility and Lincoln Heights Preservation Coalition had requested an invite to join, and each time we were instructed not to join the meetings. Between March and August of 2024, I also offered to meet with the Appellants and stakeholders on 6 distinct occasions as the Applicant's Representative; they declined to meet with me on all 6 occasions.

Finally, we returned to PLUM on November 5, 2024, after confirming with Davida Koren, CD-14 Policy Planning and Tenants Rights Deputy, that we would not be continued and would support the approval for CEQA-NOENV-2022-6190-CE-I-A

I was entering City Hall on November 5th, when I received a call from Davida Koren (CD-14). She told me the case would be continued yet again because CD-14 received a call from the Los Angeles Carpenters Union and that we need to enter into a labor agreement before we could obtain approval of this Case. After we had a contract, we would then be placed back on the calendar for PLUM and City Council.

This Project is a unique opportunity to introduce new, quality, mixed-income housing without displacing anyone, as the proposed project site is currently a surface parking lot, it's essential for us to acknowledge the need for more housing in a neighborhood of increasing demand to prevent the forces



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of displacement. We are also proud the Project will implement an Affirmative Marketing Plan and encourage Section 8 applicants for the affordable and market rate units. As we know, it is expensive and time consuming for the City of Los Angeles to build low-income housing. The developers can and want to if they can proceed through entitlements in a timely manner. This is a more effective way and much faster for the City to reach its housing goals. This development also will have a blend of income levels which has proven to facilitate a person's recovery from homelessness in a faster and more gentle and effective process.

We are now delayed beyond what is required by state law. The project is supposed to be approved by now. We should have a permit and be building. The Owner risks losing his construction loan and new rates will hinder the project as it barely penciled out as is. It would be such a waste to miss this opportunity to provide much needed additional housing for a community that desperately needs it.

Thank you for your time.

*Elizabeth Peterson-Gower*

Elizabeth Peterson-Gower

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