

Communication from Public

Name: Northwest San Pedro Neighborhood Council
Date Submitted: 08/08/2020 09:22 AM
Council File No: 20-0680
Comments for Public Posting: See attached letter

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Certification Date 02-12-02
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August 7, 2020

Dear LA City Councilmembers,

Many of us devoted countless hours to shaping the San Pedro Local Community Plan (LCP), the Community Plan Implementation Overlay (CPIO), and the Pacific Corridor Redevelopment Plan, including the required environmental reviews, which were ultimately approved by the City Council. These statutes, which allow for a population increase of over 50% to approximately 120,000, define the densities, height limitations and zoning throughout San Pedro and include transportation, recreation, and public facilities while paying attention to community character, massing, and transitions.

For the property at 1309-1331 S. Pacific Ave., the LCP, CPIO, and the Pacific Corridor Redevelopment Plan would permit multifamily housing with a floor to area ratio of 1.5:1 and a height of 30', among with other requirements.

We recognize that the City and developer are taking advantage of a density bonus for 12 very low-income units as allowed under State law. With incentives and waivers provided by the City, the developer proposes 102 units with a height of 45', a floor to area ratio of 2.65:1, and reduced setbacks and open space. Further, the developer claims that the project is categorically exempt from further environmental review even though their proposal far exceeds the impacts assessed in the EIR for the LCP.

While the documentation supporting the proposed project appears to contain a number of errors that are included in the appeal of the project, the errors in calculating the traffic impacts are notable. The City requires the use of the Institute of Traffic Engineers (ITE) studies to calculate the amount of traffic generated. In this case, the ITE manuals require a trip-end generation rate of between 5.44 and 7.32 [depending on building height] but the developer used a net figure of 3.65 trip ends per day by deducting a claimed 181 trip ends for a bar on the current property which has been closed for a long time. The traffic impact they claim is thus understated by several hundred trip-ends per day and results in an unreliable analysis of the impact on local intersections. It also doesn't appear to use the "miles traveled" analysis mandated by state law.

Further, the developers have proposed another similarly sized project at 22nd and Pacific that was not included as part of a cumulative impact analysis because the project is not within 500 feet of this project. We are not aware of any such legal excuse for not evaluating the impact that their other projects will have on traffic. The city deliberately made Pacific Avenue one lane in each direction and it has become a crimp on the umbilical cord of traffic flow to the south end of San Pedro. The traffic impact of the two projects should be considered together.

The City and the developer have played hopscotch through the laws and regulations in order to permit this development. In return for including 12 very low-income units, the developer gets to increase its unit count by 35%, increase the height from 30' to 45', and still claim a categorical exemption from environmental analysis for infill construction.

Density bonus incentives and waivers disrupt our carefully developed community plan. They disrupt the character of our community, not because they attempt to provide affordable housing, but because they so seriously undermine all our community planning efforts. We participated in efforts for good planning in good faith with the expectation that our elected officials and planning personnel would at least strictly construe any change to the densities and height zones in the LCP and how those criteria affect transportation and impact on our community. We believe the City's review should require the highest level of consistency possible with our community's efforts to provide good planning. Otherwise, our efforts are meaningless.

Very Truly Yours,

A handwritten signature in black ink that reads "R. Regalado". The signature is written in a cursive style with a large, looping "R" and "D".

Ray Regalado, President

On behalf of the Northwest San Pedro Neighborhood Council Board

(This letter was approved by the Board on 7/13/20)