

April 20, 2021

Los Angeles Planning and Land Use Management (PLUM) Committee  
200 North Spring Street  
Los Angeles, CA 90012

RE: 1309-1331 South Pacific Avenue, San Pedro  
CPC-2019-4908-DB-SPR-1A and ENV-2019-4909-CE  
and  
2111-2139 South Pacific Avenue, San Pedro  
CPC-2019-4884-CU-DB-SPR-RDP and ENV-2019-4885-CE

Dear Honorable PLUM Committee Members:

On behalf of the Center on Race, Poverty & the Environment, I write to share our concerns regarding the proposed development project at 1309-1331 South Pacific Avenue in San Pedro ("Project"), in support of Citizens Protecting San Pedro ("CPSP")'s appeal. We share similar concerns for another proposed project at 2111-2139 South Pacific Avenue.

As you know, the predominantly low-income communities and communities of color surrounding the Ports of LA and Long Beach are ground zero for toxic pollution emissions in LA County. The human buffer zone around this industrial complex is a city-sanctioned health disaster area, adversely affecting more than 56,000 residents in San Pedro, 52,000 residents in Wilmington, and 205,000 residents in West and North Long Beach. Historically, the health and well-being of these 313,000 low-income, predominately non-white residents have been disregarded by the City of LA. Affordable, healthy housing development that meets the unique needs of vulnerable Port-adjacent communities is one necessary and effective way to protect them from further harm. We ask for your help to establish legal precedents in San Pedro that will safeguard and bring some level of environmental and economic justice to these already vulnerable communities.

**Unfortunately, in San Pedro and other nearby low-income communities, the City is enabling luxury housing disproportionately over affordable housing (despite the glut of empty market rate units), and is allowing developers to violate environmental law, land-use regulations, and community plans.** Not only does this type of action further harm the environment and quality of life for longtime residents, it will displace and replace them due to the cumulative impact of market rate developments.

We support CPSP's conclusion that a Categorical Exemption for this Project is erroneous, that further environmental study is required, and that the Project must comply with land use and density bonus zoning regulations as well as the various Community Plans. Additionally, the significant adverse impacts from the Project cannot be meaningfully addressed by individual mitigations for each impact identified. Therefore, we also agree with CPSP's recommendation to reduce the size of the Project in order to effectively mitigate their potential significant adverse environmental impacts. We also request the City to work with the developer to increase the percentage of affordable units to low-income and very low-income families.

As the City's decision-makers on land use matters, you have the opportunity and responsibility to follow the City's environmental goals and protect the environmental health and housing stability of San Pedro's vulnerable communities. **We urge you to ensure that this Project complies with CEQA, zoning codes, and existing Community/Redevelopment Plans before considering its approval.**

Thank you for your consideration.

Sincerely,

Chelsea Tu  
*Senior Attorney*  
*Center on Race, Poverty & the Environment*