

**ARMBRUSTER GOLDSMITH & DELVAC LLP**

LAND USE ENTITLEMENTS □ LITIGATION □ MUNICIPAL ADVOCACY

DAVE RAND  
DIRECT DIAL: 310-254-9025

12100 WILSHIRE BOULEVARD, SUITE 1600  
LOS ANGELES, CALIFORNIA 90025

Tel: (310) 209-8800  
Fax: (310) 209-8801

E-MAIL: Dave@AGD-LandUse.com

WEB: www.AGD-LandUse.com

June 1, 2021

**VIA EMAIL**

Planning and Land Use Management (PLUM) Committee  
Los Angeles City Council  
Attn: Armando Bencomo, Deputy City Clerk, PLUM  
Committee  
200 N. Spring Street, Room 395  
Los Angeles, CA 90012

clerk.plumcommittee@lacity.org

**Re: Case No. CPC-2019-4908-DB-SPR; CF 20-0680 (1309-1331 South Pacific Avenue) – Applicant’s Response to June 1, 2021 Letter from Appellant’s Counsel**

Honorable Members of the PLUM Committee:

This firm represents RKD 13 PAC., LP (the “Applicant”), the applicant for the above-referenced project (the “Project”) located at 1309-1331 South Pacific Avenue (the “Site”). The Project is the construction of a four-story, 45-foot and five-inch residential building with 102 dwelling units (including 12 Very Low-Income affordable units). This letter supplements the letters our firm submitted to the PLUM Committee on April 16, 2021 and May 19, 2021.

On June 1, 2021, counsel to appellant Citizens Protecting San Pedro (“Appellant”) sent a letter to this Committee (the “June 1 Appeal Letter”) arguing that the Project fails to comply with the Community Redevelopment Law’s affordable housing regulations, as set forth in California Health and Safety Code (“HSC”) Section 33413. The arguments in the June 1 Appeal Letter are meritless, and this letter rebuts them.

**I. HSC Section 33413(b)(1) is Inapplicable, as the Project is Privately Funded.**

Appellant appears to allege that, because the Project would develop new housing units in the Pacific Corridor Redevelopment Project Area, it is subject to a 30% affordable housing requirement, as set forth in HSC Section 33413(b)(1). Appellant is correct that the Redevelopment Plan for the Pacific Corridor Redevelopment Area (the “Redevelopment Plan”) remains in effect. However, the HSC subsection that Appellant cites is inapplicable to the Project, because the Project is not “developed by” a redevelopment agency. The Project will be developed entirely with private financing and would not receive any public subsidies. Therefore, the 30% affordable housing requirement is inapplicable to the Project.

**II. HSC Section 33413(b)(2)(A)(1) Applies in the Aggregate, and Not on a Project-by-Project Basis.**

PLUM Committee of  
The Los Angeles City Council  
June 1, 2021  
Page 2

Appellant alleges that 15% of the total units in the Project must be set aside as affordable units pursuant to HSC Section 33413(b)(2)(A)(1). However, Appellant fails to reference HSC Section 33413(b)(3), which clarifies that the “requirements of this subdivision shall apply, **in the aggregate**, to housing made available pursuant to paragraphs (1) and (2), respectively, **and not to each individual case of rehabilitation, development, or construction of dwelling units . . . .**” (Emphasis added.)

This subsection makes clear that the 15% affordable requirement applies on a Redevelopment Plan area-wide, and not project-by-project, basis. Neither the former Redevelopment Agency nor the City Planning Department have determined that the requirement applies to the Project, or indeed to individual projects in the Redevelopment Plan area generally. Appellant incorrectly asserts that this subsection applies a de facto 15% inclusionary affordable requirement to the Project.

As discussed below, the Project is a mixed-income development that would provide affordable units in compliance with the State Density Bonus Law (California Government Code (“CGC”) Section 65915). That said, 100% affordable housing projects proposed in the Redevelopment Plan area would make up for any deficiencies in area-wide affordable housing production caused by market-rate or mixed-income developments.

In particular, the One San Pedro Specific Plan project proposed by the Housing Authority of the City of Los Angeles (HACLA), for which a Notice of Preparation was filed in January 2021 (see enclosed **Exhibit A**), would redevelop an existing 478-unit public housing complex known as “Rancho San Pedro” with a 1,390-unit, mixed-income project. The vast majority of the proposed Specific Plan area is in the Redevelopment Plan area. The proposed Specific Plan, if approved and developed, would substantially increase total affordable housing within the Redevelopment Plan area and would more than supersede the Project’s minor contribution to any area-wide deficiency, if any.

### **III. The State Density Bonus Law, not the Community Redevelopment Law, Governs the Project’s Affordable Housing.**

Even if the 15% affordable requirement Appellant cites did apply to the Project individually, the Project does provide 15% affordable units using the density calculation required by the State Density Bonus Law (California Government Code (“CGC”) Section 65915).

As discussed in our April 16, 2021 letter, the Density Bonus Law provides that the affordable housing requirement is calculated based upon a site’s base density. Although the State Density Bonus Law uses the term “total units”, the Density Bonus Law expressly provides that “For the purposes of this section, “total units” . . . does not include units added by a density bonus awarded pursuant to this section or any local law granting a greater density bonus.” (CGC § 65915(b)(3).) The Project complies with the Density Bonus Law and is consistent with every other Density Bonus Law project in the City and State by calculating the affordable housing requirement

PLUM Committee of  
The Los Angeles City Council  
June 1, 2021  
Page 3

based upon the site's base density of 79 units and describing the affordable housing requirement as a percentage of base density.

The Density Bonus Law is designed to encourage mixed-income projects. It does not include any carve-outs with respect to the Community Redevelopment Law or compliance with HSC Section 33413. The specific density calculation the Density Bonus Law prescribes supersedes a general Community Redevelopment Law requirement. Thus, even if HSC Section 33413 did somehow apply to the Project individually, which it does not, using the density calculation the Density Bonus Law requires, the Project would effectively provide 15% Very Low-Income affordable units calculated based upon the Site's base density.

**IV. Requiring the Project to Provide Additional Affordable Housing Would Violate the State Housing Accountability Act.**

As discussed above, Section 33413 does not impose an inclusionary affordable housing requirement on the Project. However, even if the City wished to impose an additional affordable housing obligation on the Project as a policy matter, the State Housing Accountability Act (the "HAA"; CGC Section 65589.5) would prevent the City from doing so.

The HAA provides, in part, that when a project complies with all applicable, objective general plan and zoning standards, the City cannot disapprove the project or impose a condition that the project be developed at a lower density unless it makes specified written findings based upon a preponderance of the evidence that a specific, adverse health or safety impact exists. (CGC § 65589.5(j)(1).) As discussed in our April 16, 2021 letter, the Project would comply with all applicable zoning standards. Under the HAA, receipt of a density bonus, incentives, concessions, and waivers of development standards does not render a proposed housing project inconsistent with applicable zoning or land use plans. Therefore, the Project qualifies for the HAA's protections. The City cannot, as the Appellant suggests, deny the Project due to an allegedly deficient number of affordable units. Moreover, imposing a condition requiring additional affordable housing without a legal nexus would be tantamount to requiring that the project be developed at a lower density, and therefore would be prohibited under the HAA.

**V. Conclusion.**

As set forth in this letter, the Project would provide sufficient affordable housing to be eligible for State Density Bonus Law benefits. The Project is not individually subject to HSC Section 33413 and we respectfully submit that the City cannot deny approval of the Project on that basis.

*[Signature Follows]*

ARMBRUSTER GOLDSMITH & DELVAC LLP

PLUM Committee of  
The Los Angeles City Council  
June 1, 2021  
Page 4

Thank you for your time and consideration of this matter. Please do not hesitate to contact me with any questions.

Sincerely,



Dave Rand

cc: Connie Chauv, Department of City Planning  
Michelle Singh, Department of City Planning  
Jonathan Lonner, Burns & Bouchard  
Damon Mamalakis, AGD  
Daniel Mandel, AGD

Enclosures:

Exhibit A – One San Pedro Specific Plan – Notice of Preparation – Draft Environmental Impact Report and Public Scoping Meeting, January 13, 2021

# EXHIBIT A

## Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613  
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

|              |
|--------------|
| <b>SCH #</b> |
|--------------|

**Project Title:** \_\_\_\_\_

Lead Agency: \_\_\_\_\_ Contact Person: \_\_\_\_\_

Mailing Address: \_\_\_\_\_ Phone: \_\_\_\_\_

City: \_\_\_\_\_ Zip: \_\_\_\_\_ County: \_\_\_\_\_

**Project Location:** County: \_\_\_\_\_ City/Nearest Community: \_\_\_\_\_

Cross Streets: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Longitude/Latitude (degrees, minutes and seconds): \_\_\_\_\_° \_\_\_\_\_' \_\_\_\_\_" N / \_\_\_\_\_° \_\_\_\_\_' \_\_\_\_\_" W Total Acres: \_\_\_\_\_

Assessor's Parcel No.: \_\_\_\_\_ Section: \_\_\_\_\_ Twp.: \_\_\_\_\_ Range: \_\_\_\_\_ Base: \_\_\_\_\_

Within 2 Miles: State Hwy #: \_\_\_\_\_ Waterways: \_\_\_\_\_

Airports: \_\_\_\_\_ Railways: \_\_\_\_\_ Schools: \_\_\_\_\_

**Document Type:**

- |                                      |  |                                    |  |
|--------------------------------------|--|------------------------------------|--|
| CEQA: <input type="checkbox"/> NOP   | <input type="checkbox"/> Draft EIR                 | NEPA: <input type="checkbox"/> NOI | Other: <input type="checkbox"/> Joint Document |
| <input type="checkbox"/> Early Cons  | <input type="checkbox"/> Supplement/Subsequent EIR | <input type="checkbox"/> EA        | <input type="checkbox"/> Final Document        |
| <input type="checkbox"/> Neg Dec     | (Prior SCH No.) _____                              | <input type="checkbox"/> Draft EIS | <input type="checkbox"/> Other: _____          |
| <input type="checkbox"/> Mit Neg Dec | Other: _____                                       | <input type="checkbox"/> FONSI     | _____  |

**Local Action Type:**

- |   |   |  |   |
|---|---|--|---|
| <input type="checkbox"/> General Plan Update    | <input type="checkbox"/> Specific Plan            | <input type="checkbox"/> Rezone                            | <input type="checkbox"/> Annexation     |
| <input type="checkbox"/> General Plan Amendment | <input type="checkbox"/> Master Plan              | <input type="checkbox"/> Prezone                           | <input type="checkbox"/> Redevelopment  |
| <input type="checkbox"/> General Plan Element   | <input type="checkbox"/> Planned Unit Development | <input type="checkbox"/> Use Permit                        | <input type="checkbox"/> Coastal Permit |
| <input type="checkbox"/> Community Plan         | <input type="checkbox"/> Site Plan                | <input type="checkbox"/> Land Division (Subdivision, etc.) | <input type="checkbox"/> Other: _____   |

**Development Type:**

- |   |  |
|---|--|
| <input type="checkbox"/> Residential: Units _____ Acres _____                 | <input type="checkbox"/> Transportation: Type _____            |
| <input type="checkbox"/> Office: Sq.ft. _____ Acres _____ Employees _____     | <input type="checkbox"/> Mining: Mineral _____                 |
| <input type="checkbox"/> Commercial: Sq.ft. _____ Acres _____ Employees _____ | <input type="checkbox"/> Power: Type _____ MW _____            |
| <input type="checkbox"/> Industrial: Sq.ft. _____ Acres _____ Employees _____ | <input type="checkbox"/> Waste Treatment: Type _____ MGD _____ |
| <input type="checkbox"/> Educational: _____                                   | <input type="checkbox"/> Hazardous Waste: Type _____           |
| <input type="checkbox"/> Recreational: _____                                  | <input type="checkbox"/> Other: _____                          |
| <input type="checkbox"/> Water Facilities: Type _____ MGD _____               |  |

**Project Issues Discussed in Document:**

- |   |   |  |   |
|---|---|--|---|
| <input type="checkbox"/> Aesthetic/Visual         | <input type="checkbox"/> Fiscal                     | <input type="checkbox"/> Recreation/Parks                | <input type="checkbox"/> Vegetation               |
| <input type="checkbox"/> Agricultural Land        | <input type="checkbox"/> Flood Plain/Flooding       | <input type="checkbox"/> Schools/Universities            | <input type="checkbox"/> Water Quality            |
| <input type="checkbox"/> Air Quality              | <input type="checkbox"/> Forest Land/Fire Hazard    | <input type="checkbox"/> Septic Systems                  | <input type="checkbox"/> Water Supply/Groundwater |
| <input type="checkbox"/> Archeological/Historical | <input type="checkbox"/> Geologic/Seismic           | <input type="checkbox"/> Sewer Capacity                  | <input type="checkbox"/> Wetland/Riparian         |
| <input type="checkbox"/> Biological Resources     | <input type="checkbox"/> Minerals                   | <input type="checkbox"/> Soil Erosion/Compaction/Grading | <input type="checkbox"/> Growth Inducement        |
| <input type="checkbox"/> Coastal Zone             | <input type="checkbox"/> Noise                      | <input type="checkbox"/> Solid Waste                     | <input type="checkbox"/> Land Use                 |
| <input type="checkbox"/> Drainage/Absorption      | <input type="checkbox"/> Population/Housing Balance | <input type="checkbox"/> Toxic/Hazardous                 | <input type="checkbox"/> Cumulative Effects       |
| <input type="checkbox"/> Economic/Jobs            | <input type="checkbox"/> Public Services/Facilities | <input type="checkbox"/> Traffic/Circulation             | <input type="checkbox"/> Other: _____             |

**Present Land Use/Zoning/General Plan Designation:**

**Project Description:** (please use a separate page if necessary)

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

## Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with an "X".  
If you have already sent your document to the agency please denote that with an "S".

|  |  |
|--|--|
| <input type="checkbox"/> Air Resources Board                         | <input type="checkbox"/> Office of Historic Preservation                     |
| <input type="checkbox"/> Boating & Waterways, Department of          | <input type="checkbox"/> Office of Public School Construction                |
| <input type="checkbox"/> California Emergency Management Agency      | <input type="checkbox"/> Parks & Recreation, Department of                   |
| <input type="checkbox"/> California Highway Patrol                   | <input type="checkbox"/> Pesticide Regulation, Department of                 |
| <input type="checkbox"/> Caltrans District # _____                   | <input type="checkbox"/> Public Utilities Commission                         |
| <input type="checkbox"/> Caltrans Division of Aeronautics            | <input type="checkbox"/> Regional WQCB # _____                               |
| <input type="checkbox"/> Caltrans Planning                           | <input type="checkbox"/> Resources Agency                                    |
| <input type="checkbox"/> Central Valley Flood Protection Board       | <input type="checkbox"/> Resources Recycling and Recovery, Department of     |
| <input type="checkbox"/> Coachella Valley Mtns. Conservancy          | <input type="checkbox"/> S.F. Bay Conservation & Development Comm.           |
| <input type="checkbox"/> Coastal Commission                          | <input type="checkbox"/> San Gabriel & Lower L.A. Rivers & Mtns. Conservancy |
| <input type="checkbox"/> Colorado River Board                        | <input type="checkbox"/> San Joaquin River Conservancy                       |
| <input type="checkbox"/> Conservation, Department of                 | <input type="checkbox"/> Santa Monica Mtns. Conservancy                      |
| <input type="checkbox"/> Corrections, Department of                  | <input type="checkbox"/> State Lands Commission                              |
| <input type="checkbox"/> Delta Protection Commission                 | <input type="checkbox"/> SWRCB: Clean Water Grants                           |
| <input type="checkbox"/> Education, Department of                    | <input type="checkbox"/> SWRCB: Water Quality                                |
| <input type="checkbox"/> Energy Commission                           | <input type="checkbox"/> SWRCB: Water Rights                                 |
| <input type="checkbox"/> Fish & Game Region # _____                  | <input type="checkbox"/> Tahoe Regional Planning Agency                      |
| <input type="checkbox"/> Food & Agriculture, Department of           | <input type="checkbox"/> Toxic Substances Control, Department of             |
| <input type="checkbox"/> Forestry and Fire Protection, Department of | <input type="checkbox"/> Water Resources, Department of                      |
| <input type="checkbox"/> General Services, Department of             |  |
| <input type="checkbox"/> Health Services, Department of              | <input type="checkbox"/> Other: _____  |
| <input type="checkbox"/> Housing & Community Development             | <input type="checkbox"/> Other: _____  |
| <input type="checkbox"/> Native American Heritage Commission         |  |

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### Local Public Review Period (to be filled in by lead agency)

Starting Date \_\_\_\_\_ Ending Date \_\_\_\_\_

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### Lead Agency (Complete if applicable):

Consulting Firm: \_\_\_\_\_ Applicant: \_\_\_\_\_  
Address: \_\_\_\_\_ Address: \_\_\_\_\_  
City/State/Zip: \_\_\_\_\_ City/State/Zip: \_\_\_\_\_  
Contact: \_\_\_\_\_ Phone: \_\_\_\_\_  
Phone: \_\_\_\_\_

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Signature of Lead Agency Representative: Douglas Guthrie Date: \_\_\_\_\_

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.



## NOTICE OF PREPARATION DRAFT ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING

January 13, 2021

|                               |   |
|-------------------------------|---|
| <b>PROJECT NAME:</b>          | One San Pedro Specific Plan   |
| <b>LEAD AGENCY:</b>           | Housing Authority of the City of Los Angeles                        |
| <b>APPLICANT:</b>             | One San Pedro (collectively)  |
| <b>PROJECT ADDRESS:</b>       | 275 West First Street, Los Angeles, CA 90731                        |
| <b>COMMUNITY PLAN AREA:</b>   | San Pedro Community Plan Area                                       |
| <b>LA COUNCIL DISTRICT:</b>   | 15 – Buscaino   |
| <b>PUBLIC COMMENT PERIOD:</b> | January 13, 2021 – February 12, 2021                                |
| <b>SCOPING MEETING:</b>       | 10:00 A.M., February 6, 2021. See below for additional information. |

The Housing Authority of the City of Los Angeles (HACLA), which is the Lead Agency under CEQA (CEQA Lead Agency) for the proposed project, will be preparing a joint Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the proposed One San Pedro Specific Plan (Project). Pursuant to the California Environmental Quality Act (CEQA), Public Resources Code Sections 21000 et seq. and the CEQA Guidelines, Title 14 of the California Code of Regulations, section 15000 et seq., the Lead Agency has the principal responsibility for carrying out or approving a project and decides whether the project may have a significant effect on the environment. The U.S. Department of Housing and Urban Development (HUD), acting through the City of Los Angeles Housing + Community Investment Development (HCID) as the National Environmental Policy Act (NEPA) Lead Agency and Responsible Entity in accordance with Title 24 of the Code of Federal Regulations Part 58, is preparing the Environmental Impact Statement in compliance with NEPA.

In accordance with CEQA Guidelines Section 15082, HACLA has prepared this Notice of Preparation to provide the public, nearby residents/businesses and property owners, responsible agencies, and other interested parties with information regarding the Project and its potential environmental effects.

The CEQA Lead Agency requests your written comments on the scope and content of the EIR/EIS, including mitigation measures or project alternatives to reduce potential environmental impacts from the project. Comments must be submitted in writing according to directions below. If you represent a public agency, HACLA seeks written comments as to the scope and content of the environmental information in the EIR/EIS that are germane to your agency's statutory responsibilities in connection with the project. Your agency may need to use the EIR/EIS when considering your permit or other necessary approvals for the project.

A Public Scoping Meeting will be held to receive input regarding environmental areas of concern and topics the EIR/EIS should study. No decisions about the Project are made at the Public Scoping Meeting. Additional project details, meeting information, and instructions for public comment submittal are listed below.

### PROJECT LOCATION AND EXISTING ON-SITE USES:

The Project is located at 275 West First Street in the City of Los Angeles, CA 90731 in the community of San Pedro (project site). The project site is approximately 21 acres in size and is currently developed with an existing 478-unit public housing complex known as "Rancho San Pedro", which was initially developed in 1942 with subsequent development in 1955. The existing access to the project site is from local surface streets surrounding the site, which

include Santa Cruz Street to the north, Harbor Boulevard to the east, 3<sup>rd</sup> Street to the south, and Mesa Street to the west.

### **PROJECT DESCRIPTION:**

Development of the proposed project would occur in multiple phases. Initial phases would focus on replacement and expansion of the aging housing stock with the later phases dedicated to expansion of affordable units, community amenities, and services. The proposed phasing would be planned to minimize disturbance to current residents. The project would pursue a “build-first” approach to the greatest extent possible. When residents must be relocated, HACLA adheres to all of the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. For purposes of the environmental analysis and to provide a conservative analysis of environmental impacts., overall construction is estimated to take approximately 14 years, with construction activities occurring from 2024 to 2037. The opening year for the first constructed buildings is expected to occur in 2025. See attached Figure 1 – Conceptual Site Plan.

The proposed project involves the redevelopment of the Rancho San Pedro complex with a Specific Plan in order to improve the physical condition of the community and increase housing stock and amenities for residents. The proposed project would include demolition of the existing 478-unit Rancho San Pedro (in phases) complex, including 8,000 square feet (sf) of amenities, services and administration, and construction of new housing with a total of up to 1,390 multi-family residential units for mixed-income households, 85,000 sf of services, amenities and administration, and 45,000 sf of commercial/retail uses. Each building would have its own onsite parking garage with secured access limited to residents. In addition to secured parking garages, no zoning code on-street parking within and around the site would also be maximized, including expanding available diagonal parking where available. This would include reconfiguring on-street curb parking, transitioning from parallel to diagonal parking on some blocks. The proposed project would maintain the existing street grid and block configuration, with the exception of Beacon Street and the intersecting portion of Second Street, where a new pedestrian plaza is proposed. Site access would be similar to the existing conditions.

### **REQUESTED ACTIONS:**

- (1) Adoption of Master Development Agreement, Disposition and Development Agreements, Ground Leases, and Relocation Plan by HACLA;
- (2) National Environmental Policy Act (NEPA) Part 58 Compliance necessary for Demolition/Disposition and Rental Assistance Demonstration (RAD) Conversion of the existing Rancho San Pedro development from the United States Department of Housing and Urban Development (HUD) and potential federal funding for the Project;
- (3) Certification of the Environmental Impact Report/Environmental Impact Statement (EIR/EIS);
- (4) Adoption of the One San Pedro Specific Plan, General Plan Amendment, Phased Vesting Tentative Tract Map, and Zone and Height District change by the City of Los Angeles;
- (5) Haul route approval from the Los Angeles Department of Building and Safety (if required);
- (6) Permit for removal of street trees from the Los Angeles Board of Public Works (if required);
- (7) Approval of a Water Supply Assessment; and
- (8) Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, demolition, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits in order to execute and implement the Project.

### **POTENTIAL ENVIRONMENTAL EFFECTS OF THE PROJECT:**

The proposed project could have potentially significant environmental impacts in the following topic areas, which will be addressed in the EIR/EIS:

Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Energy, Environmental Justice (NEPA), Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Population and Housing, Public Services, Recreation, Transportation/Traffic, Tribal Cultural Resources, and Utilities/Service Systems.

**PUBLIC SCOPING MEETING:** A Public Scoping Meeting will be held in an online format using Zoom to share information regarding the project and the environmental review process and to receive written public comments regarding the scope and content of the environmental analysis to be addressed in the EIR/EIS. Staff, environmental consultants, and project representatives will be available, and a brief presentation is scheduled. HACLA encourages all interested individuals and organizations to attend this meeting. Written comments may be submitted during the project review period, but there will be no verbal comments or public testimony taken at the Public Scoping Meeting. No decisions about the project will be made at the Public Scoping Meeting. A separate public hearing on the underlying project approvals will be scheduled after the completion of the Draft EIR/EIS.

The date, time, and location of the Public Scoping Meeting are as follows:

**Date:** Saturday, February 6, 2021  
**Time:** 10:00 a.m.  
**Location:** Virtual Meeting via:

<https://zoom.us/j/94249457658?pwd=RnJpbm8rN01HZWFNVS9pZDgra2RrQT09>  
Meeting ID: 942 4945 7658  
Passcode: 639556

Dial in by phone:  
+1-408-638-0968 or +1-669-900-6833  
Meeting ID: 942 4945 7658  
Find your local number: <https://zoom.us/u/aeEM1qQ8kr>

#### **REVIEW AND COMMENTS:**

If you have questions about this Notice of Preparation, please contact Jessica Frazier at (213) 219-1401 or [jessica.frazier@hacla.org](mailto:jessica.frazier@hacla.org).

In an effort to broaden community outreach, this notice has been translated into Spanish and is available on the HACLA website at <https://home.hacla.org/>. Puede obtener información en español sobre esta reunión llamando a Jocelyn Aldana al (213) 252-1037. In the event of any inconsistency between this notice in English and a translated notice, this notice shall prevail.

HACLA will consider all written comments regarding the potential environmental impacts of the project and issues to be addressed in the EIR/EIS. If you wish to submit comments, please reference the project name above, and submit them in writing by February 12, 2021. Written comments will also be accepted at the Public Scoping Meeting described above.

Please direct comments to:

Mail: **Jessica E. Frazier, MBA** | Development Officer  
Strategic Development  
**Housing Authority of the City of Los Angeles**  
2600 Wilshire Blvd | 3rd Floor | Los Angeles, CA 90057  
☎:213-252-4215 | 📞:213-219-1401 | ✉:[jessica.frazier@hacla.org](mailto:jessica.frazier@hacla.org)

**ACCOMMODATIONS:** As a covered entity under Title II of the Americans with Disabilities Act, the Housing Authority of the City of Los Angeles does not discriminate on the basis of disability. The Public Scoping Meeting is a virtual meeting and multi-language translation will be provided. HACLA wants the meeting to be open to those with Limited English Proficiency and Individuals with Disabilities. In order to ensure HACLA is able to effectively communicate with individuals in another language or with disabilities, including individuals with hearing, vision or speech impairments, HACLA will furnish appropriate auxiliary aids and services, where necessary. Examples of auxiliary aids and services include amplification headsets, language interpreters, note-takers, transcription services, written materials and large print materials. To ensure availability, you are advised to make your request for an auxiliary aid or service at least 72 hours prior to the meeting/event. Requests should be directed to Jocelyn Aldana at (213) 252-1037 or by email [Jocelyn.aldana@hacla.org](mailto:Jocelyn.aldana@hacla.org).

Attachments:

Figure 1- Conceptual Site Plan

*Puede obtener información en español sobre esta reunión llamando a Jocelyn Aldana al (213) 252-1037*

Figure 1 Rancho San Pedro Redevelopment Conceptual Site Plan



**AGENCY:** Office of the Assistant Secretary for Community Planning and Development, HUD.

**ACTION:** Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS).

**SUMMARY:** The City of Los Angeles, through the Housing and Community Investment Department (HCID), is providing notice of its intent to prepare a combined Environmental Impact Report (EIR) in accordance with the California Environmental Quality Act (CEQA) and Environmental Impact Statement (EIS) in accordance with the National Environmental Policy Act (NEPA) (EIR/EIS) for the One San Pedro Redevelopment Project (project) located in Los Angeles, CA. The proposed action is subject to compliance with NEPA because the Housing Authority of the City of Los Angeles (HACLA) is proposing a HUD Section 18 demolition/disposition and the developer is planning to use Project Based Section 8 Vouchers. HACLA will consider a Disposition and Development Agreement with the developer. This Notice of Intent to prepare an EIR/EIS represents the beginning of the public scoping process. Following the scoping meeting referenced below, a Draft EIR/EIS will be prepared and ultimately circulated.

**ADDRESSES:** Comments relating to the scope of the EIR/EIS are requested and will be accepted by the contact persons listed below during the 30-day comment period. Any person or agency interested in receiving a notice and wishing to comment on the Draft EIR/EIS should contact the persons listed below. Documents are available at the following websites: <http://hcidla.lacity.org/NEPA-review> and [www.onesanpedro.org](http://www.onesanpedro.org).

**FOR FURTHER INFORMATION CONTACT:** Jinderpal Singh Bhandal, Environmental Supervisor, Finance & Development Division, HCID, (213) 808-8558, [Jinderpal.Bhandal@lacity.org](mailto:Jinderpal.Bhandal@lacity.org). Comments and questions can also be directed to Jessica Frazier, Development Officer, Strategic Development, HACLA, [jessica.frazier@hacla.org](mailto:jessica.frazier@hacla.org), telephone number: (213) 252-6120.

**PUBLIC PARTICIPATION:** The public will be invited to participate in the review of the Draft EIR/EIS. Release of the Draft EIR/EIS will be announced through public mailings as well as the local news media. All interested Federal, state, and local agencies, Indian tribes, groups, and the public are invited to comment on the scope of the EIR/EIS. If you are an agency with jurisdiction by law over natural or other public resources affected by the project, HCID needs to know what environmental information germane to your statutory responsibilities should be included in the EIR/EIS.

**SUPPLEMENTARY INFORMATION:** The project site is located in the Barton Hill neighborhood with the historic Downtown San Pedro located two blocks to the south and the San Pedro Waterfront to the east. The Port of Los Angeles (managed by the Los Angeles Harbor Department) lies to the east, and toward the north, north of the SR 47 (Vincent Thomas Bridge).

The majority of the surrounding Barton Hill neighborhood has a low-density residential character with single-family homes, though numerous properties host a main home on the front of the lot and an accessory dwelling unit to the rear. Additionally, there are a few vintage bungalow courts, small lot properties, and duplexes. The residential character of Barton Hill becomes denser with two- and three-story multifamily buildings around the Rancho San Pedro border. Other affordable housing developments to the immediate north and southwest of the project site host medium residential density development, with an increase in building scale towards Pacific Avenue to the west and Downtown San Pedro to the south. Immediately to the south between Rancho San Pedro and the Downtown core of 6th and 7th Street are a collection of civic and institutional buildings, including the Harbor Department Administration Building, Port Police Headquarters, Port of Los Angeles Charter High School, and The Port of Los Angeles Boys & Girls Club.

**PURPOSE AND NEED FOR AGENCY ACTION:** Rancho San Pedro is seventy to eighty years old and the structures are reaching their useful life expectancy. The buildings were constructed in a style, form and function typical of public housing developments at that time and suffer from monotonous building design, repetitive building pattern, long street frontages, and lack of through streets. These design deficiencies result in indefensible space and security issues, inadequately sized units, and accessibility issues, among other things. As the Greater Los Angeles region is experiencing a crisis of housing affordability, resulting in over-crowding conditions and homelessness, there is also the added imperative to use the large publicly owned property to expand affordable housing supply.

In 2015, HACLA, in cooperation with Los Angeles City Council District 15 and the Mayor's Office of Economic Development, commissioned a feasibility study to determine the highest and best use and development potential of the Rancho San Pedro public housing property. The study outlines potential strategies to maximize the value of the property to the public and concludes that replacing and expanding the available housing – both affordable as well as market-rate – would be the highest and best use of the public property with the primary objective to replace the existing affordable housing located at Rancho San Pedro for those currently residing there.

The location, size of the property, and potential redevelopment scale also provides the capacity to layer additional community benefits into redevelopment. These have been identified within the San Pedro Redevelopment Plan, as well as by residents of Rancho San Pedro.

The project would thrive as a revitalized, mixed-income neighborhood that builds on its existing assets and creates new, high-quality housing options. Adjacent to the waterfront and downtown, the project would be a model for other revitalization efforts, complete with cultural, community, and economic activity. It would be a safe neighborhood with new parks and recreational opportunities, walking and biking streets, and a variety of housing and supportive service options.

**PROJECT NAME AND DESCRIPTION:** The project is located at 275 West First Street in the City of Los Angeles in the community of San Pedro. The project site is approximately 21 acres in size and is currently developed with an existing 478-unit public housing complex known as "Rancho San Pedro," which was initially developed in 1942 with subsequent development in 1955. The existing access to the project site is from local surface streets surrounding the site, which include Santa Cruz Street to the north, Harbor Boulevard to the east, 3rd Street to the south, and Mesa Street to the west.

Development of the proposed project would occur in multiple phases. Initial phases would focus on replacement and expansion of the aging housing stock with the later phases dedicated to expansion of affordable units, homeownership, community amenities, and services. The proposed phasing would be planned to minimize disturbance to current residents. The project would pursue a "build-first" approach to the greatest extent possible. When residents must be relocated, HACLA adheres to all of the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. For purposes of the environmental analysis and to provide a conservative analysis of environmental impacts, overall construction is estimated to take approximately 14 years, with construction activities occurring from 2024 to 2037. The opening year for the first constructed buildings is expected to occur in 2025.

The proposed project involves the redevelopment of the Rancho San Pedro complex with a Specific Plan in order to improve the physical condition of the community and increase housing stock and amenities for residents. The proposed project would include demolition of the existing 478-unit Rancho San Pedro complex, including 8,000 square feet (sf) of amenities, services and administration, and construction of new housing (in phases) with a total of up to 1,390 multi-family residential units for mixed-income households, 85,000 sf of services, amenities and administration, and 45,000 sf of commercial/retail uses. Each building would have its own onsite parking garage with secured access limited to residents. In addition to secured parking garages, on-street parking within and

around the site would also be maximized for guests and customers, including expanding available diagonal parking where available. This would include reconfiguring on-street curb parking, transitioning from parallel to diagonal parking on some blocks. The proposed project would maintain the existing street grid and block configuration, with the exception of Beacon Street and the intersecting portion of Second Street, where a new pedestrian plaza is proposed. Site access would be similar to the existing conditions.

The project will require the following approvals: (1) Adoption of Master Development Agreement, Disposition and Development Agreements, Ground Leases, and Relocation Plan by HACLA; (2) NEPA Part 58 Compliance necessary for Demolition/Disposition and Rental Assistance Demonstration (RAD) Conversion of the existing Rancho San Pedro development from the United States Department of Housing and Urban Development (HUD) and potential federal funding for the project; (3) Certification of the EIR/EIS; (4) Adoption of the One San Pedro Specific Plan, General Plan Amendment, Phased Vesting Tentative Tract Map, and Zone and Height District change by the City of Los Angeles; (5) Haul route approval from the Los Angeles Department of Building and Safety (if required); (6) Permit for removal of street trees from the Los Angeles Board of Public Works (if required); (7) Approval of a Water Supply Assessment; and (8) Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, demolition permits for structures and trees, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits in order to execute and implement the project.

**ALTERNATIVES TO THE PROPOSED ACTION:** Consistent with the Council on Environmental Quality regulations (40 CFR 1502.14) implementing NEPA, the EIS will examine a range of reasonable alternatives to the proposed project that are potentially feasible. As required by NEPA, the alternatives will be evaluated at the same level of detail as the proposed project. As a result of the scoping efforts to date, the alternatives currently proposed for evaluation in the EIS include:

- (1) No Project/Action Alternative. This required alternative would evaluate the environmental impacts if the proposed project were not constructed and existing conditions remain unchanged.
- (2) Preferred Alternative. This alternative would implement the proposed project described above in this notice under Project Name and Description, including the demolition of the existing 478 housing units and the construction of up to 1,390 multi-family residential units for mixed-income households, 85,000 sf of services, amenities and administration, and 45,000 sf of commercial/retail uses.
- (3) A range of other reasonable alternatives (to be identified) based on input received during the scoping process will be considered in the EIR/EIS. These may include, an alternative where existing buildings will be rehabilitated pursuant to the Secretary of Interior Standards for Rehabilitation instead of being demolished and reconstructed; a decreased intensity alternative where the number of housing units, services, amenities and administration, and commercial/retail uses would be decreased; a modified site plan alternative where the layout and location of the buildings and critical infrastructure is modified; or an increased intensity alternative where the number of housing units, services, amenities and administration, and commercial/retail uses would be increased.
- (4) The following alternatives are infeasible and/or would not meet the purposes and needs described in this notice, and thus will not be considered: an off-site alternative as it would be financially infeasible to purchase another site of the same size in the same general geographic area; a non-residential alternative as California is experiencing a housing crisis, which has highlighted the severe deficiency of affordable housing; an alternative that reduces the number of existing housing units because of the areas significant housing need; and an alternative where the site is abandoned as it is crucial to providing affordable housing for current residents of the site and to meeting regional affordable housing needs.

**PROBABLE ENVIRONMENTAL EFFECTS:** The proposed project could have potentially significant environmental impacts in the following topic areas, which will be addressed in the EIR/EIS: Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Energy, Environmental Justice, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Population and Housing, Public Services, Recreation, Transportation/Traffic, Tribal Cultural Resources, and Utilities/Service Systems.

The scoping process also includes the initiation of the National Historic Preservation Act Section 106 consultation process. We invite comments from all interested parties about the potential impacts this project may have on historic properties, cultural resources, or biological and natural resources, as well as the impacts these resources may have on the project. We invite all interested parties to participate in the scoping meeting.

**SCOPING MEETING:** A Public Scoping Meeting will be held in an online format using Zoom to share information regarding the project and the environmental review process and to receive written public comments regarding the scope and content of the environmental analysis to be addressed in the EIR/EIS. Staff, environmental consultants, and project representatives will be available, and a brief presentation is scheduled. HACLA encourages all interested individuals and organizations to attend this meeting. Written comments may be submitted during the project review period, but there will be no verbal comments or public testimony taken at the Public Scoping Meeting. No decisions about the project will be made at the Public Scoping Meeting. A separate public hearing on the underlying project approvals will be scheduled after the completion of the Draft EIR/EIS.

The date, time, and location of the Public Scoping Meeting are as follows:

**Date:** Saturday, February 6, 2021

**Time:** 10:00 a.m.

**Location:** Virtual Meeting via:

<https://zoom.us/j/94249457658?pwd=RnJpbm8rN01HZWFNVS9pZDgra2RrQT09>

Meeting ID: 942 4945 7658

Passcode: 639556

Dial in by Phone: +1-408-638-0968 or +1-669-900-6833

Meeting ID: 942 4945 7658

Find your local number: <https://zoom.us/u/aeEM1qQ8kr>

HACLA wants the meeting to be open to those with Limited English Proficiency and Individuals with Disabilities. In order to ensure HACLA is able to effectively communicate with individuals in another language or with disabilities, including individuals with hearing, vision or speech impairments, HACLA will furnish appropriate auxiliary aids and services, where necessary. Examples of auxiliary aids and services include amplification headsets, language interpreters, note-takers, transcription services, written materials and large print materials. To ensure availability, you are advised to make your request for an auxiliary aid or service at least 72 hours prior to the meeting/event.

Requests should be directed to Jocelyn Aldana at (213) 252-1037 or by email [Jocelyn.aldana@hacla.org](mailto:Jocelyn.aldana@hacla.org). *Puede obtener información en español sobre esta Seunion llamando a Jocelyn Aldana al (213) 252-1037.*

**LEAD AGENCIES:** HCID is the responsible entity (RE) and lead agency for this project's EIS in accordance with 24 CFR part 58, "Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities." As a RE, HCID assumes the responsibility for environmental review, decision-making, and action that would otherwise apply to HUD under NEPA. Section 26 of the United States Housing Act (42 U.S.C. 1437x) allows units of general local government to assume NEPA responsibilities in projects involving Section 18 demolition/disposition and Section 8 Project-Based Vouchers. The project may use CDBG and HOME funds. If so, Section 104(g) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(g)) and Section 288 of the HOME Investment Partnerships Act (42 U.S.C. 12838) allow CDBG recipients and HOME jurisdictions, respectively, to assume NEPA responsibilities for CDBG and HOME projects.

In addition, HACLA is the CEQA lead agency and is responsible for preparing an EIR. Questions may be directed to the individuals named in this notice above under the heading FOR FURTHER INFORMATION CONTACT.

This is to be a combined environmental document, an EIR/EIS, prepared under the State of California CEQA (Public Resources Code 21000 et seq. and 14 California Code of Regulations 15000 et seq.), and an EIS, prepared under NEPA (42 U.S.C. 4321) and implementing regulations of the Council on Environmental Quality (40 CFR parts 1500–1508) and HUD (24 CFR part 58).

The project involves funding from HUD that qualifies as an "undertaking" subject to the existing Programmatic Agreement (PA) among the City of Los Angeles, the California State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation Regarding Historic Properties Affected by use of Community Development Block Grants; Rental Rehabilitation Block Grants; McKinney Act Homeless Programs including the Emergency Shelter Grants Program, Transitional Housing, Permanent Housing for the Homeless and Handicapped, and Supplemental Assistance for Facilities to Assist the Homeless; Home Investment Partnership Funds, and the Shelter Plus Care Program for compliance with 36 CFR part 800, the regulations implementing Section 106 of the National Historic Preservation Act. HCID will be initiating the Section 106 consultation process with the SHPO through the PA.