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June 11, 2021

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:

CALIFORNIA ENVIRONMENTAL QUALITY ACT ("CEQA") APPEAL OF CASE NO. ENV-2019-2790-CE, FOR PROPERTY LOCATED AT 1300 WESTWOOD BOULEVARD; CF 21-0250

The project proposes the construction of a seven-story building with 31 residential units, with a maximum building height of 75 feet. The project includes one level of subterranean parking consisting of 12 parking spaces with driveway access off the alley. The proposed project encompasses 25,693 square feet of floor area, with a maximum Floor Area Ratio ("FAR") of 3.89:1. The site is currently developed with a parking lot built in 1975, which will be demolished for the project. The project will involve grading of approximately 3,000 cubic yards of soil.

On September 10, 2020, the Director of Planning approved Case No. DIR-2019-2789-TOC for the construction of the Project ("Director's Determination"). The Director determined, under Environmental Case No. ENV-2019-2790-CE that the Project is exempt from the California Environmental Quality Act ("CEQA") pursuant to CEQA Guidelines, Section 15332 (Class 32), and that there is no substantial evidence demonstrating that an exception to a categorical exemption, pursuant to Section 15300.2, applies.

On September 23, 2020, the Director's Determination was appealed to the City Planning Commission by one aggrieved party (George Merkert, represented by Laura Lake, Fix the City). On January 14, 2021, the City Planning Commission conducted a public hearing to consider the appeal under Case No. DIR-2019-2789-TOC-1A. The City Planning Commission denied the appeal with a 5-0 vote. The Letter of Determination of the City Planning Commission was issued on February 2, 2021 ("City Planning Commission Determination").

On February 8, 2021, a CEQA appeal was filed by an aggrieved party (Fix the City, represented by Laura Lake; "Appellant") to the City Council (Case No. ENV-2019-2790-CE-1A). The appeal in its entirety, including supplemental appeal points dated February 16, 2021 that were submitted after the appeal was filed on February 8, 2021, is located within Council File No. 21-0250. The appellant's claims in the February 16, 2021 materials incorporate the prior claims in the February 8, 2021 materials. Below is a summary of the appeal points with a staff response to each point.

APPEAL ANALYSIS

Appeal Point 1: *“Class 32 Criterion (e) requires adequate infrastructure, utilities, and public services. The site is served but inadequately and the city failed to make a finding of adequacy and support it with substantial evidence. This Class 32 CEQA exemption is arbitrary and capricious and a prejudicial abuse of discretion. It is an abdication of the City’s responsibility to protect public safety under the California Constitution (Article XIII, Section 35). The deception starts with fire safety CEQA analysis by the Planning Department by addressing water pressure, distance from a station, or the number of hydrants. It does not reveal whether the station is actually available or whether traffic congestion severely delays response time. While Fix the City’s focus in emergency services, this city has also experienced chronic water rationing, power outages, sinkholes, air pollution that exceeds federal limits, inadequate park space per capita, etc. This city is not adequately served. Under these circumstances, a Class 32 Exemption cannot be lawfully granted. We asked that the Class 32 CEQA Determination be rescinded. Abundant substantial evidence exists of an inadequate and worsening emergency response service from LAFD. Emergency services are inadequate as defined by the City of Los Angeles. LAFD service is inadequate and therefore a Class 32 exemption may not be lawfully granted.*

Staff Response: The proposed project was evaluated for a Class 32 Categorical Exemption as set forth in justification for ENV-2019-2790-CE. The Appellant has failed to provide substantial evidence to support its general allegations that no project within the City can qualify for Class 32 categorical exemption. Here, the Appellant has also failed to produce any project specific arguments as to why this particular project does not qualify for a Class 32 CE other than the general allegations identified above. Argument, speculation, unsubstantiated opinion, or narrative does not constitute substantial evidence, as provided in CEQA Guidelines Section 15384, which defines “substantial evidence” as:

(a) “Substantial evidence” as used in these guidelines means enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached. Whether a fair argument can be made that the project may have a significant effect on the environment is to be determined by examining the whole record before the lead agency. Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence.

(b) Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.

Contrary to Appellant’s unsubstantiated claims, the City has determined the project site can be adequately served by all required utilities and public services as set forth in the staff report, the justification set forth in the ENV-2019-2790-CE and the remainder of the administrative record. In addition, the project is required to comply with all applicable regulations and requirements of the California Building Code, the Department of Building and Safety, and the Los Angeles Fire Department. The project will incorporate contemporary building safety standards, with a new building adhering to higher fire safety standards.

The Project would be adequately served by existing utilities. Utility system capacity must be demonstrated during the City review and approval process for each project and would be required to comply with State/City water and energy conservation requirements (e.g., Title 24, Green Building Code, etc.) to minimize water and energy use, and State/City SWPPP and LID requirements to minimize stormwater runoff. In addition, the City continues to monitor wastewater flows and update infrastructure, as necessary, to accommodate the growth within the City. Lastly, both LADWP's UWMP and the City's One Water LA 2040 Plan indicate that the City has adequate water supplies to serve projected growth through at least 2040. Furthermore, the County of Los Angeles conducts ongoing evaluations to ensure that landfill capacity is adequate to serve the forecasted disposal needs of the region.

Lastly, the appellant's references to the LAFD resources are outdated, misrepresented, or not related to this specific project. The appellant has not provided substantial evidence related to this project. A vague claim to another project does not explain the relevance of the materials to this particular project. The City has provided substantial evidence to support its determination that the Project is exempt from CEQA pursuant to CEQA Guidelines, Section 15332 (Class 32).

Appeal Point 2: *"Inadequate infrastructure and public services prevent discretionary increases in density or intensity. Under General Plan Framework Mandatory Mitigation Policy 3.3.2, discretionary increases in density or intensity cannot be lawfully approved unless adequate infrastructure and public services can accommodate current development as well as the added demand."*

Staff Response: As mentioned in Appeal Point No. 1, the project can be adequately served by all required utilities and public services. The project would be required to comply with all applicable regulations and requirements of the California Building Code, the Department of Building and Safety, and the Los Angeles Fire Department. The project will incorporate contemporary building safety standards, replacing the structure on the subject site with a new building adhering to higher fire safety standards than the existing structure built in 1937.

According to the Los Angeles Fire Department, response time is considered in assessment of the adequacy of fire protection services, it is only one factor among several utilized in evaluating ability to respond to fires, life, and health safety emergencies. A variety of other criteria, including required fire flow, response distance from existing fire stations, and the LAFD's judgement for needs in an area are also weighed. If the number of incidents in a given area increases, it is the LAFD's responsibility to assign new staff and equipment and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service.

The project is required to comply with all applicable provisions of Chapter 5, Article 7, Fire Protection and Prevention (Fire Code), of the Los Angeles Municipal Code. The adequacy of existing water pressure and availability in the Project area with respect to required fire flow would be confirmed by LAFD during the plan check review process. As part of the normal building permit process the project would be required to upgrade water service laterals, meters, and related devices, as applicable, in order to provide required fire flow; however, no new water facilities are anticipated.

The Proposed Project is an infill development that makes maximum use of existing infrastructure and will be required to make the necessary local improvements (such as connections to sewer and water lines and upgraded substations and pumping facilities) per the normal development process. Ultimately, decisions regarding new development are policy decisions made by the City Council. The General Plan Framework, and specifically Policy 3.3.2, does not require the City to halt development based upon claims of inadequate infrastructure. The programs set forth

in Chapter 10 of the Framework Element to implement Policy 3.3.2 are discretionary and dependent upon available funding. However, as provided in the Director's Determination and City Planning Commission Determination, the project site will be adequately served by all public utilities and services given that the project site has previously been developed and is surrounded by urban uses and served by existing infrastructure. As mentioned in Appeal Point No. 1, the Appellant has failed to provide substantial evidence to support its general allegations that no project within the City can provide adequate infrastructure and public services. Argument, speculation, unsubstantiated opinion, or narrative does not constitute substantial evidence. Furthermore, the appellant does not provide substantial evidence supporting the need for different analysis or conclusions from those in the CEQA Exemption and has not offered any evidence that the project will increase response times.

Appeal Point 3: *"Discretionary approvals with conditions of approval make this project ineligible for Class 32 exemption. To grant a Class 32 CEQA Exemption a project must be consistent with ALL FIVE criteria for Class 32 Exemptions. The project not only violates Criterion (e) as discussed above, it is also in violation of Criterion (a) and is therefore not exempt from CEQA review."*

Staff Response: The appellant argues that the proposed project does not qualify for a Class 32 categorical exemption because the proposed project is discretionary and not consistent with all applicable general plan policies and zoning regulations. This argument misstates the law. Discretionary projects may use one or more categorical exemptions if the project satisfies the requirements as set forth in the CEQA Guidelines and as supported by substantial evidence in the administrative record. The appellant characterizes the City's issuance of TOC Incentives as prohibited under the LAMC. This characterization is also incorrect as stated in the City Planning Commission Staff Recommendation Report dated January 14, 2021 ("Staff Report"). Nothing in CEQA prohibits the use of Class 32 Exemptions for TOC projects and Appellant has not provided any legal authority to support its claim that TOC projects are not eligible for Class 32 exemptions.

As mentioned in Appeal Point Nos. 1 and 2, a Class 32 categorical exemption, at issue here, is the categorical exemption for infill development projects meeting certain conditions. As detailed in the Director's Determination, Staff Report, the City Planning Commission Determination, and the rest of the administrative record, the City has provided substantial evidence to support its determination that the Project is exempt from CEQA pursuant to CEQA Guidelines, Section 15332 (Class 32), and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies. As discussed therein, the Project substantially complies with the applicable regulations, findings, standards, and provisions of the Community Plan and Pedestrian Oriented District and is consistent with the TOC Program. Here, the Appellant has not provided any evidence to support its implied claim that the City has erred or abused its discretion by making this determination. As provided under Appeal Point No. 1, argument, speculation, unsubstantiated opinion, or narrative does not constitute substantial evidence.

Appeal Point 4: *"Class 32 Criterion (A) Class CEQA exemptions for infill projects are limited to by-right, ministerial projects that are "consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations" (Emphasis added, Criterion (a)). The project is not consistent. Therefore, granting a Class 32 CEQA exemption for a project limited to 45-feet and approved for 75-feet adjacent to a single-family home, as well as reduced yards and open space, is a substantial prejudicial abuse of discretion."*

Staff Response: The Appellant has failed to provide substantive evidence to support its allegations that the Project is not consistent with the applicable General Plan and Westwood Community Plan policies and other applicable zoning regulations. The Director and City Planning Commission have made findings of consistency with the general plan and applicable policies and regulations when approving the Project and no new substantial evidence has been raised by the Appellant regarding this analysis. As detailed in the Director's Determination, Staff Report, the City Planning Commission Determination, other appeal points in this report, and elsewhere in the administrative record, the Project is consistent with the City's General Plan, Community Plan, land use designation, zoning code, Westwood Pedestrian Oriented District, and TOC Guidelines as set forth below.

In *Wollmer v. City of Berkeley* (2011) 193 Cal. App.4th 1329, a California Court of Appeal held that the city should apply, "the plain meaning of Guidelines section 15332, subdivision (a) to its own codes in a manner that [is] in harmony with the state's density bonus law." Further, the Court held that, "in the context of a density bonus project, it is clear that the waived zoning standards are not 'applicable.'" The City has, similarly in this instance, harmonized the requirements of the General Plan and Specific Plan with its own TOC incentive program to determine the applicable set of regulations for the Project. As detailed in the Director's Determination, the City Planning Commission Determination, and the rest of the administrative record, the City has provided substantial evidence to support its harmonization and clearly define the applicable regulations.

In addition to the reasons set forth elsewhere in the record, the Project is consistent with the Housing Element of the General Plan. The Project meets the Housing Element goal, policy, and objective cited below by creating additional housing units in a transit oriented district and including four (4) units for Extremely Low Income household occupancy for a period of 55 years. As such, the following goal, objective and policy are specifically achieved.

- Goal 1: A City where housing production and preservation result in an adequate supply of ownership and rental housing that is safe, healthy, and affordable to people of all income levels, races, ages, and suitable for their various needs.
- Objective 1.1: Produce an adequate supply of rental and ownership housing in order to meet current and projected needs.
- Policy 1.1.4: Expand opportunities for residential development, particularly in designated Centers, Transit Oriented Districts and along Mixed-Use Boulevards.

The Project is also consistent with the Westwood Community Plan (part of the Land use Element of the General Plan). The Project meets the Westwood Community Plan goal, policies, and objective cited below by providing multi-family dwelling units in a new, safe, and secure building. The Project is located within a neighborhood designated for Neighborhood Office Commercial Land Uses, which allows multiple-family residential uses, and is well served by facilities and necessary infrastructure. The site is located within 750 feet from the future Metro "D" (Purple) Line-Westwood/UCLA Station and the Metro Rapid 720 bus line, which encourages alternative modes of transportation. The four covenanted affordable units will ensure that the Project is accessible to lower-income segments of the population. As such, the following goal, policies and objective are specifically achieved.

- Goal 1: A safe, secure and high-quality residential environment for all economic, age and ethnic segments of the community.

Policy 1-1.3: Provide for adequate multi-family residential development.

Policy 1-2.1: Locate higher density residential within designated multiple family areas and near commercial centers and major bus routes where public service facilities and infrastructure will support this development.

Objective 1-4: To promote the adequacy and affordability of multiple-family housing and increase its accessibility to more segments of the population.

The Director's Determination and the City Planning Commission Determination verifies that the project is consistent with the City's land use designation, zoning code, Westwood Pedestrian Oriented District, and TOC Guidelines. The project was determined eligible for three (3) Base Incentives for residential density, floor area ratio, and parking, which are granted by-right for eligible TOC projects, and was approved three (3) Additional Incentives for height and transitional height, yards/setbacks, and open space, consistent with the TOC Guidelines. Therefore, the project meets Class 32 findings (a) that "the project is consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations".

Appeal Point 5: *Westwood Boulevard is a designated POD to attract pedestrian activity yet there is no discussion of the sidewalk width. Is this project required to provide a 15-foot-wide sidewalk on Westwood Boulevard? What is the designation in Mobility Plan 2035?*

Staff Response: The appeal asserts that the project needs to meet sidewalk width requirements listed in the Westwood POD and Mobility Plan 2035. The Westwood POD does not have a sidewalk width requirement for proposed projects located in the POD. The Bureau of Engineering (BOE) is responsible for any dedication/improvement requirements for new development per LAMC 12.37. In the BOE Planning Case Referral Form dated June 11, 2018 (see Staff Report, Exhibit "J"), BOE requires the project dedicate 5-feet of width along the property street frontage facing Westwood Boulevard to complete the 55-foot half-width right-of-way, which is shown on the project plans (see Staff Report, Exhibit "A"). BOE is also requiring a 20-foot corner dedication or a 15-foot by 15-foot corner cut at the intersection of Westwood Boulevard and Wellworth Avenue, which is also shown on the project plans (see Staff Report, Exhibit "A"). BOE also requires that any broken or off-grade asphalt, sidewalk, or curb and gutters shall be repaired and/or replaced, all unused driveways shall be closed, and the curb return at the intersection of Westwood Boulevard and Wellworth Avenue with a 20-foot curb radius and ADA standard access shall be reconstructed.

The applicant has not filed for a Waiver of Dedication and Improvements entitlement to request any deviations from BOE requirements. Therefore, the sidewalk width is not part of the entitlement case since there is no Waiver of Dedication and Improvements being requested. The project will be subject to review by the Bureau of Engineering. The appeal fails to provide substantial evidence showing how the proposed project will not meet the 15-foot sidewalk width requirements. Furthermore, the City Planning Commission Determination includes Condition No. 15 that reads, "The Department of Building and Safety shall not issue a building permit for the Project unless the Project conforms to all of the applicable provisions of the Westwood Boulevard Pedestrian Oriented District, Ordinance No. 174,260." This will ensure project compliance with the Westwood Boulevard Pedestrian Oriented District prior to issuance of building permits, and is consistent with standard practice.

Appeal Point 6: *"Westwood Community Plan Violations. This project violates LAMC Section 13.07(d): "Pedestrian Access: All new developments fronting on Pedestrian Oriented Streets shall provide at least one entrance for pedestrians to each Ground Floor." This project has no door on its Westwood Boulevard frontage within the Westwood POD. The building entrance is on Wellworth Avenue, not Westwood Blvd. Therefore, the project violates the POD and does not qualify for a Class 32 Exemption. The height of this project violates LAMC 13.07.5(a): "The height of a building shall not exceed 40 feet. If the underlying zone otherwise permits a height in excess of 40 feet, then any portion of the building above 40 feet in height, including the roof and roof structure, shall be set back from the front line at a 45-degree angle, for a horizontal distance of not less than 20 feet." This project does not provide required setback above 40-feet and therefore does not qualify for a Class 32 Exemption. See p. 32 (Exhibit A, A3.12) shows Westwood frontage does not conform to the above-40-feet setback.*

Staff Response: The appeal asserts the project violates specific land-use policies and purposes of the Westwood Community Plan and the Westwood Boulevard Pedestrian Oriented District. While specific land-use policies and purposes are cited, the appeal fails to provide substantive evidence showing how the proposed project does not adhere to those policies and purposes. The Director's Determination verifies that the project is consistent with the City's land use designation, zoning code, Westwood Pedestrian Oriented District, and TOC Guidelines.

The project is consistent with the requirements of the C4-1VL-POD Zone, the TOC Guidelines, and the Westwood Boulevard Pedestrian Oriented District, and meets the applicable setback requirements. The C4 zone and Westwood POD do not require commercial uses at the site and do not prohibit 100% residential projects; therefore, a 100 percent residential project is consistent with the subject zone. The project complies with the design standards of the Westwood POD which encourages exterior building continuity and requires that building setbacks are no more than 5 feet from the Primary Lot Line per POD Section 5.A. The project also adheres to LAMC Section 13.07.E.1(d), which states that "All new developments fronting on Pedestrian Oriented Streets shall provide at least one entrance for pedestrians to each Ground Floor." The proposed project does in fact provide two entrances for pedestrians on the Ground Floor, which is defined as the lowest story within a building which is accessible to the street, the floor level of which is within three feet above or below curb level, which has frontage on or is primarily facing any Pedestrian Oriented Street, and which is at least 20 feet in depth or the total depth of the building, whichever is less. There is one pedestrian entrance off Westwood Boulevard that provides access to an individual unit, and an additional pedestrian entrance that is located off Wellworth Avenue and provides access to the lobby. The project includes transitional height from the RW1 zoned properties and a landscaped rooftop buffer to be compatible with the abutting single-family properties to the east, consistent with Policy 1-1.1 of the Westwood Community Plan, which states: "Protect existing single-family residential neighborhoods from new out of scale development and other incompatible uses". The setbacks also help enhance the façade facing Westwood Boulevard, along with the landscape buffer and elevated design to elevate the pedestrian experience. The project is conditioned to comply with POD Section 5.E.1 to provide street trees at a ratio of at least one street tree for each 30 feet of street frontage.

The appeal fails to show how the project violates Community Plan Policy 1-2, which states, "To coordinate residential density with infrastructure and to reduce vehicular trips and pass-through traffic in single-family neighborhoods by developing new multiple-family housing in proximity to services and facilities." The project is consistent with the underlying zone, TOC Guidelines, Westwood POD, and is a Tier 4 TOC development and is located less than 750 feet from a

regional transit center (from the future Metro Purple Line Rail and the existing Metro Rapid 720 bus line). The new 31-unit apartment protects the quality of the residential environment by providing residential units consistent with the land use designation and zone and enhances the visual aesthetic environment of the community by replacing a vacant parking lot with a multi-family building that will enhance the pedestrian experience of Westwood Boulevard and is located near commercial centers and major bus routes where public service facilities and infrastructure will support this development.

The appellant contends that the project violates the 40-foot building height and transitional height provisions of LAMC 13.07.E.5(a), the Westwood POD states that LAMC Section 13.07.E.5 is inapplicable. The Westwood Boulevard POD Section 5 states that "Furthermore Sections 13.07E 1(c), 1(g) 2, 3, 4, 5, 6(a), 6(b), 7, 8, 9 and 11 of the LAMC are inapplicable and have been superseded by the following development regulations contained in this Section pursuant to Section 13.07 of the LAMC". The Westwood POD also states that the provisions therein "supersede the requirements of Section 13.07 E of the LAMC".

As conditioned in the Director's Determination and City Planning Commission Determination, the project is eligible for Tier 4 Base and Additional Incentives of the TOC Guidelines. TOC Transitional height requires that the project building height limit shall be stepped back at a 45-degree angle as measured from a horizontal plane originating 25 feet above grade at the property line of the adjoining lot in the RW1 Zone or more restrictive zone, per TOC Guidelines. Therefore, the project meets the Transitional Height requirements of the TOC Guidelines, as conditioned in the Director's Determination and City Planning Commission Determination.

As provided in the Director's Determination and City Planning Commission Determination, the project site is located in the Westwood Community Plan and subject to the C4-1VL-POD zone and Height District 1VL. The site's zoning would allow a building height of 45 feet by-right. The project is eligible for Tier 4 Base and Additional Incentives of the TOC Guidelines. Therefore, the Tier 4 Height Incentive would allow a maximum height of 78 feet as stated in the Director's Determination and City Planning Commission Determination.

A restriction on height could limit the ability to construct the additional residential dwelling units, and specifically the Restricted Affordable Units. The applicant has requested a Tier 4 Additional Incentive for increased height, which allows for three additional stories up to 33 additional feet and transitional height. The C4-1VL-POD zone and Height District No. 1VL allows for a maximum height of 45 feet. Therefore, the Tier 4 Height Incentive would allow a maximum height of 78 feet. The project is within that envelope at 75 feet and 7 stories and is consistent with the TOC Guidelines. The proposed project requests an increase of 30 additional feet to allow for approximately 75 feet in building height, in lieu of the otherwise permitted 45 feet in building height in the C4-1VL-POD Zone.

As mentioned in the Appeal Point No. 5, the City Planning Commission Determination includes Condition No. 15 that reads, "The Department of Building and Safety shall not issue a building permit for the Project unless the Project conforms to all of the applicable provisions of the Westwood Boulevard Pedestrian Oriented District, Ordinance No. 174,260." This will ensure project compliance with the Westwood Boulevard Pedestrian Oriented District prior to issuance of building permits, and is consistent with standard practice.

RECOMMENDATION

Staff recommends that the PLUM Committee recommend for City Council to **deny** the appeal and **determine**, based on the whole of the administrative record, as supported by the justification prepared and found in the environmental case file, ENV-2019-2790-CE and as based on above, the project is exempt from CEQA pursuant to CEQA Guidelines, Section 15332 (Class 32), and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies.

Sincerely,

VINCENT P. BERTONI, AICP
Director of Planning

Connie Chauw for
Michelle Singh
Senior City Planner

VPB:MS:CC:JO