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September 28, 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:

**SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT REQUEST FOR  
PROPOSED CRENSHAW CROSSING PROJECT, 3502-3606 W. EXPOSITION BOULEVARD,  
3630-3646 S. CRENSHAW BOULEVARD, 3501-3633 W. OBAMA BOULEVARD, AND 3631-  
3645 S. BRONSON AVENUE, CF 21-1030**

This report includes Environmental Findings, Justification, Response to Comments, and supporting documents and technical analyses for the Sustainable Communities Environmental Assessment (SCEA) that was published for public review from June 10, 2021 to July 9, 2021 for the following project:

Project Name: Crenshaw Crossing Project  
Environmental Case No.: ENV-2019-5426-SCEA  
Project Applicant: WIP Expo Crenshaw, LLC  
Project Address: 3502-3606 W. Exposition Boulevard, 3630-3646 S. Crenshaw Boulevard, and 3501-3633 W. Obama Boulevard, 3631-3645 S. Bronson Avenue,  
Community Plan Area: West Adams-Baldwin Hills-Leimert  
Specific Plan Area: Crenshaw Corridor  
Council District: 10 – Ridley-Thomas

An initial study has been prepared and circulated in compliance with Public Resources Code (PRC) Section 21155.2(b). A public hearing on the SCEA, and all comments received on the SCEA, will be considered by City Council prior to SCEA adoption and approval of the Project. The Transit Priority Project (TPP) has incorporated all feasible mitigation measures, performance standards, or criteria set forth in prior Environmental Impact Report(s) (EIR), including the current

Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP) to include a Sustainable Communities Strategy (SCS), the City of Los Angeles West Adams-Baldwin Hills-Leimert Community Plan EIR, adopted May 2016, and the Community Redevelopment Agency of the City of Los Angeles (CRA/LA) Mid-City Redevelopment Plan EIR, adopted April 1996; finding that all potentially significant effects identified in the initial study have been identified and analyzed in the SCEA; finding that with respect to each significant effect on the environment required to be identified in the initial study for the SCEA, changes or alterations have been required in or incorporated into the Project that avoid or mitigate the significant effects to a level of insignificance or those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.

It is hereby requested that the City Council consider and determine if the proposed project qualifies for a SCEA, pursuant to PRC Section 21155.2.

### **Background**

Through the “Sustainable Communities and Climate Protection Act of 2008,” known as Senate Bill 375 (SB 375), the state legislature created a new document for environmental review called a SCEA. The intent of a SCEA is to encourage projects that would implement regional plans to reduce greenhouse gas emissions (e.g. by building housing near public transit) by providing for streamlined environmental review of Transit Priority Projects that are consistent with an adopted sustainable communities strategy. The SCEA provides complete environmental analysis by evaluating the potential effects of a Project in an Initial Study similar to a Mitigated Negative Declaration (MND), with additional requirements specific to a SCEA as described below.

SB 375 requires Metropolitan Planning Organizations (MPOs), such as SCAG, to create a new component in their Regional Transportation Plan to include a Sustainable Communities Strategy. Government Code Section 65080(b)(2)(B) requires the SCS to set forth a forecasted development pattern for the region that integrates transportation policies to reduce greenhouse gas emissions and achieve the reduction targets approved by the California Air Resources Board. SB 375 also contains new environmental clearances in the California Environmental Quality Act (CEQA) for projects that can qualify under PRC Section 21155 as TPPs. The SB 375 clearances are intended to meet the goals of the SCS to encourage higher density, infill development located near transit. If a project qualifies as a TPP and would mitigate potentially significant impacts to a level of insignificance, the lead agency may choose to prepare a SCEA. Under PRC Section 21155, to be a TPP, the project must be consistent with the general land use designation, density, building intensity, and policies in the SCAG RTP/SCS; and meet the criteria in PRC Section 21155(b) related to minimum density, residential uses, and distance from a major transit stop or high-quality transit corridor included in a regional transportation plan. Under PRC Section 21155.2(b), a TPP may qualify for a SCEA if it meets all of the following:

- The Project has incorporated all feasible mitigation measures, performance standards, or criteria set forth in applicable EIRs; and
- An initial study is prepared and the initial study shows the Project will have less than significant impacts, including if needed, through the imposition of mitigation measures.

The evaluation of a SCEA differs from standard MND environmental review in that it requires the following additional analysis: (1) consistency analysis with the SCAG RTP/SCS; and (2) analysis

to demonstrate all applicable mitigation measures from applicable EIRs have been incorporated into the Project. The SCEA also has additional procedural requirements from an MND. Under a SCEA, the City is not required to analyze growth inducing impacts or project specific or cumulative impacts from cars and light trucks on global warming or the regional transportation network. The Initial Study should identify any cumulative effects that have been adequately analyzed and mitigated in prior applicable certified EIRs. Projects that use the SCEA provisions will still need to obtain discretionary permits or other approvals from the lead agency.

### **Project Description**

The subject of this SCEA is a Project that would include the construction and operation of two mixed-use buildings, up to 86 feet in height, with up to 380,112 square feet of total floor area, including up to 401 residential units, with 61 units reserved for Very-Low Income households and 20 units reserved for Very-Low Income or Low Income households, and 40,454 square feet of commercial and community floor area, on two sites comprising approximately 4.18-acres (net area). The West Site would include a 206,803 square foot building, with 225 residential units, 7,504 square feet of ground-floor commercial/restaurant uses, and 2,650 square feet of community space, on a 1.93 acre site. The East Site would include a 173,309 square foot building, with 176 residential units and 30,300 square feet of commercial floor area (including a 22,277 square foot grocery store) on a 2.25 acre site.

The Project approvals requested by the Applicant include:

1. Pursuant to Los Angeles Municipal Code (LAMC) Section 12.22 A.25, Density Bonus Compliance Review for a Housing Development Project totaling 401 dwelling units and setting aside 15 percent (61 units) as Very Low Income Restricted Affordable Units and five percent (20 units) as Very Low or Low Income Restricted Affordable Units for a period of 55 years, with the following requested incentives and waivers:
  - i. An On-Menu Incentive to allow an increase in height of 11 feet for a 86-foot building height, in lieu of the 75 feet otherwise permitted for buildings within Subarea A of the Crenshaw Corridor Specific Plan, and an increase in height of four feet for a 34-foot building, in lieu of the 30 feet otherwise permitted for buildings within the first 50 feet of lot depth along Victoria Avenue per the Crenshaw Corridor Specific Plan;
  - ii. An On-Menu Incentive to allow a 20 percent reduction of residential open space for the West Site for a total required open space of 19,080 square feet, in lieu of the 23,850 square feet otherwise required;
  - iii. An Off-Menu Incentive to allow 43 percent (97 parking spaces) of the 225 primary residential parking spaces on the West Site and 34 percent (60 parking spaces) of the 176 primary residential parking spaces on the East Site to be compact spaces, in lieu of the requirement of one standard stall per residential unit;
  - iv. A Waiver of Development standards to allow a 5.5-foot side yard setback on the southern property line on the West Site, in lieu of the 11-feet otherwise required; and
  - v. A Waiver of Development standards to allow a zero-foot side yard setback on the eastern property line on the West Site, in lieu of the 11 feet otherwise required.
2. Pursuant to LAMC Section 12.24 W.1, a Main Conditional Use Permit to allow for the sale and dispensing of a full-line of alcoholic beverages for on-site consumption for up to six establishments, and for the sale and dispensing of a full-line of alcoholic beverages for off-

- site consumption in conjunction with a grocery store, within the South Los Angeles Alcohol Sales Specific Plan;
3. Pursuant to LAMC Section 11.5.7, a Project Permit Compliance Review to permit a mixed-use development within the Crenshaw Corridor Specific Plan;
  4. Pursuant to LAMC Section 16.05, a Site Plan Review for a development project which creates more than 50 dwelling units; and
  5. Pursuant to LAMC Section 17.15, a Vesting Tentative Tract Map to merge the existing lots, consisting of one lot on the West Site and five lots on the East Site, including portions of the public right-of-way of Lower Exposition Boulevard and Bronson Avenue, and re-subdivide into two ground lots and 34 airspace lots; and a haul route for the export of 34,000 cubic yards of soil.

### **Public Comments & Response to Comments**

The SCEA was released for public comment from June 10, 2021 to July 9, 2021. During the public comment period of the SCEA, the Department of City Planning received two written comments from members of the public. The public comments included concerns over: liquefaction, the Project's impact on water resources during a drought, the size of parking stalls, access to outdoor space relative to the Project's density, the provision of public benefits to ensure local hiring, and the adequacy of the SCEA as the environmental clearance for the project

Attached as Exhibit A of this Staff Report, a Response to Comments letter dated September 13, 2021 has been added to the Council File and provides the applicant's responses to each of the written comments received for the SCEA. Copies of the written comments in their entirety can be found in the administrative record of Case No. ENV-2019-5426-SCEA and as part of the Response to Comments letter. In summary, there is no substantial evidence that the project will have a significant effect on the environment in any of the areas of environmental concern identified by the public. Furthermore, only the project's environmental clearance is before the Planning and Land Use Management Committee of the City Council; the validity of the requested land use entitlements will be evaluated by the appropriate decisionmaker at a later date.

### **Erratum**

Attached as Exhibit B of this Staff Report, an Erratum was prepared which makes minor technical corrections and clarifications to the SCEA. These modifications clarify and refine the SCEA and provide supplemental information to City decision-makers and the public. CEQA requires recirculation of an environmental document only when substantial revisions are made or significant new information is added (refer to CEQA Guidelines Section 15088.5 regarding environmental impact reports and CEQA Guidelines Section 15073.5 regarding negative declarations) before the document is certified or adopted.

The information added pursuant to this Erratum does not disclose any new significant environmental impact that would result from the Project, nor does it identify any new or different mitigation measures resulting in new significant effects. All information added pursuant to this Erratum merely clarifies, amplifies, or makes insignificant modifications to the information contained in the SCEA. The City has reviewed the information in this Erratum and has determined that it does not change any of the basic findings or conclusions of the SCEA, does not constitute

a “substantial revision” pursuant to CEQA Guidelines Section 15073.5, and does not require recirculation of the SCEA.

The Erratum addresses a correction to the labelling of the SCEA’s Appendix F and corrections to references to the RTP/SCS. Appendix F is correctly labeled as Appendix F in the Table of Contents of the SCEA. However, the Appendix cover page is incorrectly labeled as Appendix E in the SCEA and is corrected to be labeled as Appendix F.

In addition, in Section 1.0: Introduction of the SCEA, the discussion of Senate Bill 375 pertaining to the SCEA and the discussion of Transit Priority Project Criteria refer only to the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS) and do not refer to the newly adopted 2020-2045 RTP/SCS (Connect SoCal). As such, an additional paragraph on page 1.0-2 has been added in Section 1.0: Introduction. The additional language addressing Connect SoCal makes the Introduction consistent with the rest of the existing SCEA, and does not change the analysis of impacts.

The conclusion of the level of significance for air quality impacts in Chapter III: Air Quality of the Initial Study identifies the impacts as reduced with mitigation, but incorrectly states that they would not be reduced to a less than significant level. The fifth sentence on page 4.0-35 is revised to conclude a less than significant impact with mitigation. The correction of this language makes the statement consistent with the analysis in Chapter III: Air Quality of the Initial Study and does not change the analysis of the original SCEA.

Finally, both the Initial Study checklist and the statement of level of significance for Threshold B in Chapter XIII: Noise of the Initial Study, Threshold B for groundborne vibration refers to impacts being less than significant with mitigation; however, the vibration analysis concluded this impact will be less than significant without mitigation. The table on page 4.0-140 has been revised to show the “Less than Significant” box checked. The conclusory heading associated with Threshold B on page 4.0-148 is revised to be consistent with this determination. The correction of this language makes the statement consistent with the analysis in Threshold B in Chapter XIII: Noise of the Initial Study to conclude that the Project will have less than significant impacts, and does not change the analysis in the original SCEA.

The technical corrections and clarifications described above do not add, or delete, significant, new information to the SCEA, and do not include any significant changes to the project or environmental setting, nor identify any new substantial adverse environmental effects or feasible mitigation measures.

### **Mitigation Monitoring Program**

Attached as Exhibit C of this Staff Report is the Mitigation Monitoring Program (MMP). Section 21081.6 of the Public Resources Code requires a Lead Agency to adopt a “reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” Section 15097 of the CEQA Guidelines provides additional direction on mitigation monitoring or reporting. A MMP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6, and Section 15097 of the CEQA Guidelines.

As described in the SCEA and in the Erratum dated September 2021, PRC Section 21151.2(a) requires that a TPP such as the Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. As a new predominantly residential project to be developed on an urban infill site that is within a SCAG-identified high-quality transit area and transit priority area, the most relevant prior EIRs for the Project are: the program EIR (PEIR) prepared for SCAG's 2020-2045 RTP/SCS, which was adopted by SCAG on September 3, 2020 and certified by the California Air Quality Board (CARB) on October 30, 2020, the City of Los Angeles West Adams-Baldwin Hills-Leimert Community Plan EIR, adopted May 2016, and the Community Redevelopment Agency of the City of Los Angeles (CRA/LA) Mid-City Redevelopment Plan EIR, adopted April 1996. An analysis of the mitigation measures that are applicable to the Project is provided in Section 3.0, SCEA Criteria.

Where appropriate, the SCEA has identified Project design features, regulatory compliance measures, or potential mitigation measures to avoid or to reduce potentially significant environmental impacts of the proposed Project. This MMP is designed to monitor implementation of any mitigation measures identified for the Project.

### **Environmental Findings**

The City of Los Angeles finds that the Proposed Project complies with the requirements of CEQA for using an SCEA as authorized pursuant to Public Resources Code Section 21155.2(b). The City of Los Angeles has determined that:

The Project is a Transit Priority Project (TPP) pursuant to PRC Section 21155:

- (a) The Project is consistent with the general use designation, density, building intensity, and applicable policies specified in the project area in the current SCAG RTP/SCS.
- (b) The Project contains at least 50 percent residential use, based on total building square footage, and if the project contains between 26 percent and 50 percent non-residential uses, a floor area ratio of not less than 0.75;
- (c) The Project provides a minimum net density of at least 20 dwelling units per acre;
- (d) The Project is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan, consistent with PRC Section 21155(b). A major transit stop means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. A high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

The Transit Priority Project has incorporated all feasible mitigation measures, performance standards, or criteria set forth in the following prior applicable EIRs: SCAG's 2020-2045 RTP/SCS EIR, the City of Los Angeles West Adams-Baldwin Hills-Leimert Community Plan EIR, and the Community Redevelopment Agency of the City of Los Angeles (CRA/LA) Mid-City Redevelopment Plan EIR.

An initial study has been prepared and circulated in compliance with PRC Section 21155.2(b). A public hearing on the SCEA, and all comments received on the SCEA, will be considered by City Council prior to SCEA adoption and approval of the Project.

All potentially significant or significant effects required to be identified in the initial study have been identified and analyzed.

With respect to each significant effect on the environment required to be identified in the initial study, either of the following apply:

- (i) Changes or alterations have been required in or incorporated into the project that avoid or mitigate the significant effects to a level of insignificance.
- (ii) Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.

### **Conclusion & Actions for the City Council**

In light of the foregoing, the City of Los Angeles finds that the Project complies with the requirements of CEQA for using a SCEA as authorized pursuant to Public Resources Code Section 21155.2(b). City Planning Staff recommends that PLUM recommend for City Council action the adoption of the SCEA, with the following recommended actions:

FIND, pursuant to Public Resources Code (PRC) Section 21155.2, after consideration of the whole of the administrative record, including the SB 375 Sustainable Communities Environmental Assessment, No. ENV-2019-5426-SCEA ("SCEA"), and all comments received, after imposition of all mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment;

FIND that the City Council held a hearing on and adopted the SCEA pursuant to PRC Section 21155.2(b);

FIND the Project is a transit priority project pursuant to PRC Section 21155 and the Project has incorporated all feasible mitigation measures, performance standards, or criteria set forth in prior EIR(s), including SCAG's 2020-2045 RTP/SCS EIR, the City of Los Angeles West Adams-Baldwin Hills-Leimert Community Plan EIR, and the Community Redevelopment Agency of the City of Los Angeles (CRA/LA) Mid-City Redevelopment Plan EIR;

FIND all potentially significant effects required to be identified in the initial study have been identified and analyzed in the SCEA;

FIND with respect to each significant effect on the environment required to be identified in the initial study for the SCEA, changes or alterations have been required in or incorporated into the Project that avoid or mitigate the significant effects to a level of insignificance or those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency;

FIND the SCEA reflects the independent judgment and analysis of the City;

FIND the mitigation measures have been made enforceable conditions on the project; and  
ADOPT the SCEA and the Mitigation Monitoring Program prepared for the SCEA.

Sincerely,

VINCENT P. BERTONI, AICP  
Director of Planning

Alan Como, AICP  
City Planner

VPB:MZ:AC

Enclosures

- Exhibit A – Response to Comments
- Exhibit B – Erratum
- Exhibit C – Mitigation Monitoring Program