

April 21, 2022

Los Angeles City Council  
200 N. Spring Street  
Los Angeles, CA, 90012

Re: Case Nos. CEQA No. ENV-2021-8105-CE; DIR-2021-8104-TOC-VHCA  
Project Location: 1900-1914 West 8<sup>th</sup> Street and 805-807 South Bonnie Brae Street (“the Project”)

Dear Los Angeles City Council:

On behalf of Coalition for an Equitable Westlake/MacArthur Park (“Coalition”), an unincorporated association of long-time community residents, we are writing to object to the City’s CEQA determination. A project qualifies for a Class 32 Categorical Exemption if it is developed on an infill site and meets certain criteria. However, before a project can be determined to qualify for a categorical CEQA exemption, exceptions to the exemption, such as cumulative impacts, must be considered. If an exception to a categorical exemption applies, CEQA review in the form of an MND or EIR must be conducted. CEQA Guidelines section 15355 states: “Cumulative impacts refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.”

The City has a burden to provide substantial evidence, which must be based upon facts, reasonable assumptions based on facts and expert opinion, rather than the City’s mere speculation, to support its findings. CEQA Guidelines § 15384(a); *Save Our Big Trees v. City of Santa Cruz* (2015) 241 Cal. App. 4th 694, 711 (citing *Muzzy Ranch Co. v. Solano County Airport Land Use Com.* (2007) 41 Cal. 4th 372, 386). The City must demonstrate with substantial evidence that the Project would not result in significant environmental impacts pursuant to CEQA Guidelines § 15332

Additionally, any environmental impacts based on pre-Covid levels of public transit ridership that do not take into account declining public ridership, which is expected to further decline after Covid. <https://caltransit.org/news-publications/publications/transit-california/transit-california-archives/2019-editions/may/ridership-study-revisited>; <https://www.latimes.com/opinion/story/2021-04-07/los-angeles-public-transit-crisis>

Below the Coalition submits a list of past projects, current projects and future projects spanning back to January 1,2017 that contribute towards the cumulative impacts of the Project that must be considered. The projects listed below are all within a .06 mile radius of the Project. Many have already been approved. The area within a .06 mile radius is heavily populated and is a high pedestrian and car traffic area.

The projects are listed by the address of the development, the distance from the project, the number of existing units, the number of units being constructed, the number of increased units per project and City Planning Departments assigned case number. Please see below.

### **805 S. Bonnie Brae St. (64 units)**

	<i>Address of proposed projects</i>	<i>Distance</i>	<i>Existing</i>	<i>Proposed</i>	<i>Increase</i>	<i>Case No.</i>
1	500 S UNION AVE	.6 miles	19 units	85 units	66 units	DIR-2020-1867-TOC-SPR-HCA
2	425 S UNION AVE	.6 miles	4 units	38 units	34 units	DIR-2022-310-TOC-VHCA
3	452 S. Bonnie Brae St.	.5 miles	8 units	30 units	22 units	DIR-2019-3222-TOC
4	451 S. Bonnie Brae St.	.5 miles	4 units	26 units	22 units	CPC-2018-6005-CA
5	1237 W. 7 <sup>th</sup> St.	.6 miles	None	304 units	304 units	CPC-2018-5222-SP
6	2005 W. James Wood Blvd	.2 miles	9 units	100 units	91 units	CPC-2018-6005-CA
7	820 S. Hoover St.	.6 miles	None	44 units	44 units	DIR-2017-1741-DB-CLQ-ACT
8	827 S. Grand View St.	.4 miles	9 units	60 units	51 units	DIR-2019-4221-TOC
9	714 S. Grand View St.	.4 miles	6 units	100 units	94 units	DIR-2018-4135-TOC-SPR
10	823 S. Coronado St.	.6 miles	None	77 units	77 units	DIR-2019-761-TOC
11	1600 W. Wilshire Blvd.	.4 mile	12 units	85 units	73 units	DIR-2019-2614-SPR

12	1930 Wilshire Blvd.	.3 miles	None	698 units	698 units	CPC-2018-6005-CA
13	437 S WESTLAKE AVE	.5 miles	None	63 units	63 units	ENV-2021-1315-EAF
14	831 S. Westlake Ave.	.1 mile	17 units	79 units	62 units	DIR-2019-2893-TOC
15	1517 W. 8th St.	.4 miles	None	60 units	60 units	DIR-2019-7742-TOC
16	2101 W. 8 <sup>th</sup> St.	.2 miles	None	57 units	57 units	DIR-2019-1663-TOC
17	804 S. Garland	.6 miles	None	118 units	118 units	DIR-2018-3333-SPP
18	946 S LAKE ST	.4 miles	None	67 units	67 units	DIR-2022-220-TOC-HCA
19	933 S. Park View St.	.5 miles	None	22 units	22 units	VTT-82089
20	1001 S. Park View St.	.6 miles	None	138 units	138 units	DIR-2020-929-TOC-SPR
21	924 S. Park View St.	.5 miles	None	65 units	65 units	DIR-2020-1281-TOC-HCA
22	2001 W. Olympic Blvd.	.3 miles	None	150 units	150 units	CPC-2017-4853-GPA-VZC-HD-CU-CUB-SPR
23	1543 W. Olympic Blvd	.5 miles	1 unit	200 units	199 units	CPC-2018-6005-CA
	<b>totals</b>	.6 mile	<u>Existing</u> 89 units	<u>Proposed</u> 2,462 units	<u>Increase</u> 2,373 units	<b>Note:</b> If we add the 64 units under the proposed project in question, then we get a <b>net increase of 2,437 new units</b> concentrated within 1 mile in this constantly changing neighborhood