

March 24, 2022

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

Re: Case Nos. CEQA No. ENV-2021-9073-CE; DIR-2021-9072-TOC-SPR-HCA  
Project Location: 603, 603 ½ & 605 S. Mariposa Avenue (“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 Coalition challenges the Site Plan Review Findings on the basis that the environmental findings upon which the Site Plan Review approval is based on is faulty since the Project does not qualify for an exemption. The findings state that there is not a succession of known projects of the same type and in the same place as the subject property.” However, this conclusive statement is not supported by substantial evidence.

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.

### **603 S. Mariposa (92 units)**

	<i>Address of proposed projects</i>	<i>Dist.</i>	<i>Existing</i>	<i>Proposed</i>	<i>Increase</i>	<i>Case No.</i>
1	689 S. Catalina St.	.4 miles	None	61 units	61 units	ZA-2017-4204-ZAA-SPR
2	924 S Catalina St.	.4 miles	4 units	30 units	26 units	DIR-2018-3005-TOC
3	826 S Mariposa Ave	.5 miles	None	98 units	98 units	CPC-2017-4369-CU-DB
4	936 S Mariposa Ave	.6 miles	1unit	21units	20 units	DIR-2019-4091-TOC
5	715 S Mariposa Ave	.3 miles	40 units	44 units	4 units	DIR-2020-149-TOC
6	846 S Mariposa Ave	.5 miles	8 units	38 units	30 units	DIR-2018-2943-TOC
7	909 S Fedora St	.6 miles	1 unit	23 units	22 units	DIR-2017-278-DB
8	936 S. Fedora St.	.6 miles	2 units	30 units	28 units	DIR-2021-7390-TOC-HCA

9	849 S Fedora St	.6 miles	None	75 units	75 units	CPC-2017-4346-CU-DB
10	3800 W. 6 <sup>th</sup> St.	.4 miles	None	301 units	301 units	ZA-2021-9345-TOC-ZAA-CU-SPR-HCA
11	3216 W 8th St	.4 miles	None	80 units	80 units	APCC-2018-1511-ZC-ZAA-CU-CUB-SPR
12	832 S. Kenmore Ave.	.6 miles	None	45 units	45 units	DIR-2022-1302-HCA-TOC
13	900 S Kenmore Ave	.6 miles	2 units	29 units	27 units	TT-74228-EXT
14	923 S Kenmore Ave	.6 miles	None	75 units	75 units	DIR-2019-3502-TOC
15	738 S Normandie Ave	.5 miles	None	50 units	50 units	DIR-2019-929-TOC
16	904 S Normandie Ave	.6 miles	2 units	29 units	27 units	DIR-2018-4983-TOC
17	860 S Normandie Ave	.6 miles	8 units	57 units	49 units	DIR-2018-2808-TOC
18	748 S. Irolo St.	.4 miles	10 units	33 Units	23 units	ENV-2021-1020-EAF
19	825 S Irolo St	.5 miles	1unit	29 units	28 units	DIR-2019-3143-TOC
20	620 S. Kingsley Dr.	.3 miles	None	127 units	127 units	DIR-2022-363-TOC-SPR-HCA
21	815 S Kingsley Dr,	.6 miles	8 units	114 units	106 units	DIR-2020-1881-SPR-TOC-VHCA-1A
22	4303 W. Pico Blvd.	.2 miles	None	75 units	75 units	DIR-2021-394-TOC-HCA
23	3440 W. Wilshire Blvd.	.1 mile	None	640 units	640 units	CPC-2016-3692-VZC-MCUP-SPR-1A
	<b>totals</b>	.6 miles	<u><b>Existing</b></u> 84 units	<u><b>Proposed</b></u> 2,104 units	<u><b>Increase</b></u> 2,020 units	<b>Note:</b> If we add the 92 units under the proposed project in question, then we get a <b>net increase of 2,112 new units</b> concentrated within .6 miles in this constantly changing neighborhood