

July 15, 2022

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

Re: Case Nos. CEQA - ENV-2022-757-CE; DIR-2022-756-TOC-HCA
Project Location: 1037 S. Dewey 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 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.

1037 S. Dewey Ave. (60 units)

	<i>Address of proposed projects</i>	<i>Dist.</i>	<i>Existing</i>	<i>Proposed</i>	<i>Increase</i>	<i>Case No.</i>
1	966 S DEWEY AVE	.1 miles	None	99 units	99 units	ZA-2017-3446-VCU-CUB-ZAA-SPR
2	909 S. FEDODORA ST	.6 miles	1 unit	23 units	22 units	DIR-2017-278-DB
3	924 S. CATALINA	.3 miles	4 units	30 units	24 units	DIR-2018-3005-TOC
4	950 S BERENDO ST	.3 miles	7 units	75 units	70 units	ENV-2018-3646-EAF
5	904 S NORMANDIE AVE	.5 miles	21 units	29 units	8 units	ENV-2018-4984-EAF
6	3031 W OLYMPIC BLVD	.4 miles	None	14 units	14 units	DIR-2019-1053-TOC
7	968 S FEDORA ST	.3 miles	None	50 units	50 units	DIR-2019-1113-TOC
8	2870 W OLYMPIC BLVD	.1 miles	None	126 units	126 units	DIR-2019-2498-SPR
9	982 S DEWEY AVE	.1 miles	2 units	14 units	12 units	ENV-2019-3453-EIR
10	936 S MARIPOSA AVE	.6 miles	1 unit	21 units	20 units	DIR-2019-4091-TOC
11	986 S MARIPOSA AVE	.3 miles	3 units	100 units	97 units	DIR-2020-1140-TOC-SPR-HCA
12	944 S DEWEY AVE	.2 miles	4 units	51 units	47 units	DIR-2020-5590-TOC-HCA
13	900 S KENMORE AVE	.5 miles	None	29 units	29 units	TT-74228-EXT
14	950 S BERENDO ST	.3 miles	7 units	77 units	70 units	DIR-2021-9706-TOC-HCA
15	832 S KENMORE AVE	.6 miles	6 units	45 units	39 units	DIR-2022-1302-HCA-TOC
	totals	.6 miles	<u>Existing</u> 56 units	<u>Proposed</u> 783 units	<u>Increase</u> 727 units	Note: If we add the 60 units under the proposed project in question, then we get a net increase of 787 new units concentrated within .6 miles in this constantly changing neighborhood