

November 30, 2022

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

Re: Case Nos. CEQA No. ENV-2020-1868-CE; DIR-2020-1867-TOC-HCA  
Project Location: 500, 500 1/2, 502, 502 1/2, 508, 510, 510 1/4, 510 1/2, 512, 512 1/4, 512 1/2 S. Union Ave  
("the Project")

Dear Los Angeles City Council:

I am 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 I submit 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.

**500, 500 1/2, 502, 502 1/2, 508, 510, 510 1/4, 510 1/2, 512, 512 1/4, 512 1/2  
S. Union Ave (85 Units)**

	<i>Address of proposed projects</i>	<i>Dist.</i>	<i>Existing</i>	<i>Proposed</i>	<i>Increase</i>	<i>Case No.</i>
1	451 S Bonnie Brae St	.4 mile	4 units	26 units	22 units	DIR-2016-4972-DB
2	329 S Bonnie Brae St	.5 mile	4 units	30 units	26 units	DIR-2018-5515-TOC
3	452 S Bonnie Brae St	.4 mile	9 units	30 units	21 units	DIR-2019-3222-TOC
4	366 S Loma Dr.	.3 mile	None	39 units	39 units	DIR-2018-2831-TOC
5	500 S Lucas Ave	.5 mile	None	54 units	54 units	ZA-2018-1458-CUB-CU-ZAD-WDI-SPP
6	1324 Wilshire Blvd.	.4 mile	None	50 units	50 units	DIR-2017-1816-SPR
7	1600 W Wilshire Blvd	.3 mile	None	85 units	85 units	DIR-2019-2614-SPR
8	1540 W. 6 <sup>th</sup> St.	.2 mile	1 unit	38 units	37 units	DIR-2022-5869-TOC-SPP-VHCA
9	1701 W 6th St	469 ft	None	100 units	100 units	ENV-2020-5078-EAF
10	1822 W 4th St	.4 miles	1 unit	20 units	19 units	DIR-2020-2769-TOC

11	425 S. Union Ave.	446 ft	4 units	38 units	34 units	DIR-2022-310-TOC-VHCA
12	521 S Union Ave.	85ft	22 units	32 units	10 units	B20VN06324
13	525 S Union Ave.	100ft	17 units	44 units	27 units	B20VN06324
14	1247 W. 7 <sup>th</sup> St.	.6 mile	None	304 units	304 units	ENV-2006-8586-MND-REC2
15	437 S. Westlake Ave.	.4 mile	None	63 units	63 units	ENV-2021-1315-EAF
16	1517 W. 8 <sup>th</sup> St.	.6 mile	None	60 units	60 units	DIR-2019-7742-TOC
	<b>Totals</b>	<u><i>Distance</i></u> .6 miles	<u><i>Existing</i></u> 62 units	<u><i>Proposed</i></u> 1,013 units	<u><i>Increase</i></u> 951 units	<b>Note:</b> Adding the <b>85</b> units from this project, we get a net increase of <b>1,036</b> new units in one of the, if not the most densely populated neighborhood in LA. Any neighborhood's social fabric will inevitably be changed with this number of new market rate units, especially this Latino neighborhood that already is going through a gentrification process.