

## Communication from Public

**Name:** Buried Under the Blue

**Date Submitted:** 10/16/2023 02:43 AM

**Council File No:** 23-0796

**Comments for Public Posting:** We oppose the project, request the committee not to approve the CEQA exemption, and require the applicant to do a full environmental impact report.



**October 16, 2023**

**To:** Planning and Land use Management Committee

**Subject:** Letter of opposition to Categorical Exemption pursuant to California Environmental Quality Act (CEQA) Guidelines, Article 19, Section 15332, Class 32

- Case No. CPC20226189CUDBZAASPRHCA1A
- Environmental No. ENV20226190CE
- Related Case No. CPC20226189CUDBZAASPRHCA

We are in opposition of the following project to be awarded a CEQA Category exemption pursuant to article 9 section 15332 Class 32 for the following reasons listed below:

**(a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.**

- This project is not consistent with the applicable General plan designation nor the general plan policies as well as the applicable zoning designation regulations. This project is 100% out of scale for the Lincoln Heights community.
- The project is requesting a density bonus for Housing Development in which the density increase is greater than 35% permitted in LAMC Section 12.22 A. 25 2. For this reason, we believe that it violates section 15332 (A) of the class 32 CEQA Exemption.
- The project request On-Menu Incentive to permit a 22 percent increase in the allowable Floor Area Ratio (FAR) to allow a FAR of 3.67:1 in lieu of the 3.0:1 FAR permitted in the R31 Zone pursuant to LAMC Section 12.21.1 A.1; b). For this reason, we believe that it violates section 15332 (A) of the class 32 CEQA Exemption.
- The project request On-Menu Incentive to permit the area of land required to be dedicated for street or alley purposes to be included as lot area for the purposes of calculating the maximum density permitted by the R3 Zone; c) an Off-Menu Incentive to permit decrease in residential automobile parking to allow the provision of 103 parking spaces, with 18 in tandem, in lieu of the 216 parking spaces required pursuant to LAMC Section 12.21 A.4; d). For this reason, we believe that it violates section 15332 (A) of the class 32 CEQA Exemption.
- The project requests a Waiver of Development Standard to permit a 50 percent decrease in required east side yard setbacks to allow a five-foot side yard setback in lieu of the 10 feet required by the R31 Zone pursuant to LAMC Section 12.10 C.2; e) For this reason we believe that it violates section 15332 (A) of the class 32 CEQA Exemption. For this reason, we believe that it violates section 15332 (A) of the class 32 CEQA Exemption.
- The project requests a Waiver of Development Standard to permit a 50 percent decrease in required west side yard setbacks to allow a five-foot side yard setback in lieu of the 10 feet required by the R31 Zone pursuant to LAMC Section 12.10 C.2; f) For this reason we believe that it violates section 15332 (A) of the class 32 CEQA Exemption.

- The project requests a Waiver of Development Standard to permit a 41-foot increase in building height to allow up to 86 feet in lieu of the maximum 45 feet allowed in the R31 Zone pursuant to LAMC Section 12.21.1; g) For this reason we believe that it violates section 15332 (A) of the class 32 CEQA Exemption.
- The project requests a Waiver of Development Standard to permit a 20 percent reduction in required open space to allow the provision of 15,480 square feet in lieu of the 19,350 square feet required pursuant to LAMC 12.21 G.2; h) For this reason we believe that it violates section 15332 (A) of the class 32 CEQA Exemption.
- The project requests a Waiver of Development Standard to permit 10 compact parking stalls and 93 standard stalls in lieu of the one standard parking stall per dwelling unit minimum required pursuant to LAMC Section 12.21 A.5(c); 3) For this reason we believe that it violates section 15332 (A) of the class 32 CEQA Exemption.
- The project request approving a Site Plan Review, pursuant to LAMC Section 16.05, for a development project which creates, or results in an increase of more than 50 dwelling units; for the construction, use and maintenance of a new seven story residential development with 184 residential units. For this reason, we believe that it violates section 15332 (A) of the class 32 CEQA Exemption.

**(c) The project site has no value, as habitat for endangered, rare or threatened species.**

The project site is being built near the historical Lincoln Park Lake Formerly Known as Eastlake. Lincoln Park Lake Is home to many different species of migratory Birds some of which are on the verge of being in danger or endangered. The community and museums have conducted bat surveys. In a recent event while observing bats at Lincoln park Lake the community Collected the sounds of an endangered Hoary bat (*Lasiurus Cinereus*). Not too far away in the Los Angeles flood control Channel AKA Los Angeles River the Least Bell's Vireo an endangered species was found to be nesting. There is a very good chance that these birds would migrate to our local parks for habitat and food. The project site is also part of the Pacific Flyway in which many migratory Birds use trees and rooftops for nesting and housing. For this reason, we believe that the project will have a significant impact on habitat for endangered rare and threatened species. We also believe that because of these findings this project should not be Exempted and should be required to do a full environmental impact report.

**(d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.**

The site where the project is being proposed to be built already has a historical issue with not enough parking for local residents. The surrounding community also has high levels of traffic at all times of the day. Due to these conditions the noise and air quality has been greatly affected for many years adding this building that is out of scale will only add to the two main existing problems of the community traffic and not enough parking. This project will have a significant impact on the residents that live in the community and Will put their health, safety and Welfare at risk. The project should not be Exempted from CEQA It should be made to do a full environmental impact report as to study its full effect on environment wildlife and to the people that will have to live with this massive out of scale project.

We recommend the following. That the city of Los Angeles planning and land use management committee deny the CEQA exemption and require the applicant to do a full Environmental impact report. The full environmental impact report would address many of the concerns that both residents and local organizations are bringing up that are very valid. It is also important to keep in mind at the Lincoln Heights community has always been a victim of environmental Injustice and It's time to listen to the people and award them their full environmental Impact report.

We are 100% in solidarity with the Lincoln Heights preservation coalition and the residents of Lincoln Heights.

Sincerely,  
Buried under the blue