

Communication from Public

Name: Nona Friedman

Date Submitted: 04/19/2024 06:01 PM

Council File No: 23-0623

Comments for Public Posting: I believe that single family residents within historic neighborhoods and HPOZs are an integral part of our city. I think it is imperative to keep them. There is plenty of space within Los Angeles city and county to accommodate housing needs without tearing Dow and destroying homes that have historical value and add character to our city. Please, please, please let the neighborhoods stay in tact.

Communication from Public

Name: Charles Rosin
Date Submitted: 04/22/2024 10:40 AM
Council File No: 23-0623
Comments for Public Posting: Attached please find a comment letter from the Coalition for Safe Coastal Development. Thank you-



April 12, 2024

Office of Mayor Bass
City Hall
200 N. Spring St.
Los Angeles, CA 90012

Honorable Mayor Bass,

The Coalition for Safe Coastal Development is a Venice-based organization working to ensure environmental protections, due process and legal requirements are respected for new development in our coastal community.

We appreciate this opportunity to give you our feedback on ED-1/100% Affordable Housing Streamlining Ordinance.

In order to ensure adequate environmental protections, the ED1 eligibility requirement should MIRROR the language found in AB 785, which you sponsored. Specifically, it should include the language of Public Resources Code Section 21080.27 (a)(1)(B):

(B) The housing development project site meets both of the following conditions:

(i) The site is located in an urbanized area or urban cluster, as designated by the United States Census Bureau.

(ii) If the project is located on a vacant site, the **site does not contain tribal cultural resources** that could be affected by the development that were found pursuant to a consultation as described by Section 21080.3.1 and the effects of which cannot be mitigated pursuant to the process described in Section 21080.3.2.

(C) The housing development project site is not any of the following:

(i) A **site located within a very high fire hazard severity zone**, as indicated on maps adopted by the Department of Forestry and Fire Protection pursuant to Section 4202 or as designated pursuant to subdivisions (a) and (b) of Section 51179 of the Government Code.

(ii) A site that is either prime farmland or farmland of statewide importance, as defined pursuant to United States Department of Agriculture land inventory and monitoring criteria, as modified for California, and designated on the maps prepared by the Farmland Mapping and Monitoring Program of the Department of Conservation, or land zoned or designated for agricultural protection or preservation by a local ballot measure that was approved by the voters of that jurisdiction.

(iii) **Wetlands**, as defined in the United States Fish and Wildlife Service Manual, Part 660 FW 2 (June 21, 1993).

(iv) A **hazardous waste site** that is listed pursuant to Section 65962.5 of the Government Code or a hazardous waste site designated by the Department of Toxic Substances Control pursuant to Section 25356 of the Health and Safety Code, unless either of the following apply:

(I) The site is an underground storage tank site that received a uniform closure letter issued pursuant to subdivision (g) of Section 25296.10 of the Health and Safety Code based on closure criteria established by the State Water Resources Control Board for residential use or residential mixed uses. This section does not alter or change the conditions to remove a site from the list of hazardous waste sites listed pursuant to Section 65962.5 of the Government Code.

(II) The State Department of Public Health, the State Water Resources Control Board, the Department of Toxic Substances Control, or a local agency making a determination pursuant to subdivision (c) of Section 25296.10 of the Health and Safety Code, has otherwise determined that the site is suitable for residential use or residential mixed uses.

(v) A site located within a special flood hazard area subject to inundation by the 1 percent annual chance flood (100-year flood) as determined by the Federal Emergency Management Agency in any official maps published by the Federal Emergency Management Agency. If a development proponent is able to satisfy all applicable federal qualifying criteria in order to provide that the site satisfies this clause and is otherwise eligible for an exemption under this section, a local government shall not deny the application on the basis that the development proponent did not comply with any additional permit requirement, standard, or action adopted by that local government that is applicable to that site. A development may be located on a site described in this clause if either of the following are met:

(I) The site has been subject to a Letter of Map Revision prepared by the Federal Emergency Management Agency and issued to the local jurisdiction.

(II) The site meets Federal Emergency Management Agency requirements necessary to meet minimum flood plain management criteria of the National Flood Insurance Program pursuant to Part 59 (commencing with Section 59.1) and Part 60 (commencing with Section 60.1) of Subchapter B of Chapter I of Title 44 of the Code of Federal Regulations.

(vi) A site located within a regulatory floodway as determined by the Federal Emergency Management Agency in any official maps published by the Federal Emergency Management Agency, unless the development has received a no-rise certification in accordance with Section 60.3(d)(3) of Title 44 of the Code of Federal Regulations. If a development proponent is able to satisfy all applicable federal qualifying criteria in order to provide that the site satisfies this clause and is otherwise eligible for an exemption under this section, a local government shall not deny the application on the basis that the development proponent did not comply with any additional permit requirement, standard, or action adopted by that local government that is applicable to that site.

(vii) Lands identified for conservation in an adopted natural community conservation plan pursuant to the Natural Community Conservation Planning Act (Chapter 10 (commencing with Section 2800) of Division 3 of the Fish and Game Code), habitat conservation plan pursuant to the federal Endangered Species Act of 1973 (16 U.S.C. Sec. 1531 et seq.), or other adopted natural resource protection plan.

(viii) Habitat for protected species identified as candidate, sensitive, or species of special status by state or federal agencies, fully protected species, or species protected by the federal Endangered Species Act of 1973 (16 U.S.C. Sec. 1531 et seq.), the California Endangered Species Act (Chapter 1.5 (commencing with Section 2050) of Division 3 of the Fish and Game Code), or the Native Plant Protection Act (Chapter 10 (commencing with Section 1900) of Division 2 of the Fish and Game Code).

(ix) Lands under conservation easement.

Again, thank you for the opportunity to comment. We would be honored to be able to discuss this with you or your representatives.

Sincerely,

Charles Rosin, Coalition for Safe Coastal Development

CC: City Attorney Hydee Feldstein-Soto, Councilmember Traci Park, Kevin Keller, Matthew Glesne