

Communication from Public

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Council File No: 26-0680

Comments for Public Posting: Appellant letter attached for 7354 Baird

Dear Councilmembers,

June 22, 2026

I sincerely apologize for not being able to present my concerns to you in person. I made a commitment months ago to help an out of state friend with post-surgery assistance, something I could not reschedule.

In any event, I wanted to make you aware of a type of project that should be cause for concern, and suggest some steps our city leaders could take to ensure we are providing safe and healthy living environments (inside and out) as we densify our housing.

The project before you is a Shared Housing building that proposes to operate as a Residential Care Facility for the Elderly (RCFE). This building will be 3-stories on a 7,500 square foot lot, with 34 bedroom units of which 30 units will be market rate and 4 units will be for Very Low Income units. These units will be approximately 200 square feet with private bathrooms. A shared living and dining area will be located on the 2nd and 3rd floors (approx. 400 sf each) and one communal kitchen will be located on the 3rd floor. The project has two spiral staircases and one small elevator (74 sf). These units are considered guest rooms and a shared housing building is considered one dwelling unit even though in many ways it is similar to a multi-residential unit building or multi-family building.

As this is a density bonus case, the applicant has taken advantage of off-menu incentives and waivers, and has been afforded “dismissals” of certain requested incentives and waivers based on how Shared Housing Buildings or Shared Housing Units are being defined and interpreted as it relates to the LAMC.

CREATION OF AN UNHEALTHY LIVING ENVIRONMENT

The applicant has requested 0 front and rear yard setbacks, reduced side yard setbacks of 3 feet, 10 inches, 0 landscaping, 0 on-site open space, and 0 trees to be planted. In addition, they will be removing two mature non-protected trees shade trees, of which one in the front southwest corner of the site could be spared. The entire site will be 100% impervious with concrete. Seniors will be primarily limited to their rooms and small living and dining areas. If

you have experienced assisted living facilities, most aim to provide outdoor open space with landscaping and trees as well as on-site activity rooms. This bodes well for the social and mental well-being for any population, but especially for our seniors, many of whom have mobility issues. The PVP likened this project to a warehouse for seniors. The CPC clearly had concerns with the project but said “their hands were tied” because of state density bonus law however they were unclear of what is required from the State department of Social Services that provides licenses for RCFE’s. Planning did not research this issue as they said they have been told to “stay in their lane” when it comes to state law. So, we have a situation where we are now knowingly approving unhealthy living environments by permitting extreme and unlimited waivers and incentives just because it is a cost reduction to a developer, no matter how small the cost. The same applicant has two more identical projects like this in the pipeline.

CUMULATIVE IMPACTS

As mentioned, the Categorical Exemption (CE32) did not fully analyze the cumulative impacts of worst case scenario, such as a 100% impervious site with no landscaping or trees. An excerpt from the Finding for Cumulative Impacts reads “...*there are no similar active Shared Housing Buildings used as a Residential Care Facility for the Elderly in the vicinity. As such, the cumulative impact of successive projects of the same type in the same place, over time, would not be significant.*” Although recent cases in the vicinity were identified in the DCP staff report, the environmental analysis appears limited by only focusing on Shared Housing Buildings used as an RCFE and instead should look at similar incentive and waiver density bonus cases that reduce yard space and call for less landscaping and trees. Comparing the base conditions to the proposed or approved project matters as well. For example, you could have removal of 50 mature shade trees and 50 percent permeable ground and replace with 100% concrete or have remove an existing parking lot and replace with concrete.

The point is, we are removing ground space, trees and landscaping without addressing the environmental impacts of such removal and not replacing, such as an increase in the urban heat island effect, increased runoff and flooding, and persistent or worsening air quality. Being an Angeleno for over 30 years, most of us can see and feel the effects as common knowledge. Recent articles also point to the same.

AIR QUALITY - LA Times- June 6, 2026 - L.A. region begins the year with the smoggiest first 5 months in a decade

“The first five months of 2026 in Southern California have been the smoggiest — with the highest number of unhealthy air days — in more than a decade, according to

statewide air monitoring.....The pollution has been especially severe in valleys. On April 18, an air monitor in Reseda in the San Fernando Valley measured the second highest spike in hourly ozone levels in the last decade...”

URBAN HEAT ISLAND/HIGH HEAT -May 27, 2026 - Los Angeles County Department of Public Health Releases Heat-Related Illness and Mortality Dashboard

“Extreme heat is becoming more frequent and severe, making heat-related illness an increasing concern especially for older adults, young children, outdoor workers, and people with underlying health conditions....said Barbara Ferrer, PhD, MPH, MEd, Director of the Los Angeles County Department of Public Health.”

<https://onebillionresilient.org/hot-cities-chilled-economies-los-angeles/>

FLOODING/IMPERVIOUS SURFACES – The Mechanics of Impervious Surfaces

- **Lack of Infiltration:** In natural settings, much of the rain absorbs into the soil and recharges groundwater aquifers. Concrete and asphalt block this process, turning light rainfalls into aggressive, pooling surface runoff...” <https://www.mdpi.com/2073-4441/14/19/3143>

Recognizing the above is more anecdotal evidence and not the substantial evidence needed to win an environmental appeal per se, it really starts to beg the question, what are we waiting for?? If we know intuitively potential harm will be caused by our actions, why can't our city leaders consider addressing cumulative impacts by gathering or conducting substantial evidence potentially being exacerbated by poor planning and make a case to the state?

PUBLIC SAFETY

The subject project is being approved without the public, decision makers, and our city leaders actually knowing how the elderly residents will be safe in the event of an emergency. We defer to LAFD not knowing anything more which doesn't make sense. There should be standard LAFD requirements for RCFE's projects (of course depends on number of units and number of stories, amongst other variations) that are included as Conditions of Approval in the formal determination. Without at least baseline conditions of approval, we can be approving projects that are unsafe, which I believe this project is.

In this project, no one knows how elderly residents will communicate in case of emergency.? Is there an LAFD requirement for all senior residents in an RCFE? Is it a state requirement? For example, does there need to be an alarm system in each room or does everyone have an alarm pendant?

Do we know beforehand if that ONE elevator is acceptable in case of fire or evacuation? When is it acceptable or when not? Are the spiral staircases in a RCFE a safety hazard? How fast can the one staff person or LAFD evacuate all the residents of this facility in a worst case scenario? What would be the turnaround time based on what is being provided and the maximum number of residents allowed? What would be an acceptable turnaround time? Can the 200 square foot room include two residents? What is the required ratio of RCFE staff to residents? Can non-ambulatory residents be on the 2nd and 3rd floors? Is there a requirement that these kind of restrictions be on the Certificate of Occupancy? Does LAFD check the emergency requirements on a yearly basis?

Councilmembers, I hope you can appreciate the concerns raised today. It's not just about this project. This project is a good example of what we should know beforehand and an eye opener to the bigger picture impacts of denser housing without addressing the potential environmental impacts. Below is a summary of requested actions for your consideration.

REQUESTED ACTIONS FROM OUR CITY COUNCIL:

1. REQUIRE A FORMAL REVIEW AND WRITTEN DIRECTOR'S INTERPRETATION as to whether the provisions under LAMC 12.21 C.1(g) and 12.21 G apply to Shared Housing Buildings. There are numerous housing typologies in our code. Shared Housing is fairly new and should be formally interpreted with respect to required on-site open space and landscaping. What is the purpose of requiring on-site open space and landscaping for multi-family buildings and why wouldn't we require the same for multi-unit residential buildings? I believe the current informal interpretation is incorrect and needs to be formally addressed for public review and consistency.
2. REQUEST RESEARCH be conducted on the potential cumulative impacts of impervious development projects, the removal and/or non-replacement of trees, and lack of landscaping.

3. REQUIRE AN LAFD REPORT BACK on current requirements for RCFE's and evaluate if more safety measures are needed such as evacuation requirements and provide greater understanding on RCFE impact on LAFD services/capacity.
4. REQUIRE LAFD conditions of approval before a project is approved.
5. EXPLORE STATE DEPARTMENT OF SOCIAL SERVICES requirements with respect to what is the minimum requirement for social activities, food service, staff ratios, etc.

Sincerely,

Marianne King

(Retired City Planner, Community Forest Advisory Commissioner, daughter of a mother who lived in an assisted living facility)