



PACIFIC PALISADES COMMUNITY COUNCIL

February __, 2021

DRAFT Comment Letter – Subject to PPCC Board Approval

City of Los Angeles, Dept. of City Planning
ATTN: Cally Hardy, City Planning Associate
200 N. Spring St., Rm. 750
Los Angeles, CA 90012

Via email: housingelement@lacity.org

Re Case Nos.: CPC-2020-1365-GPA; ENV-2020-6762-EIR (Citywide Housing Element 2021-2029 Update)

Dear Ms. Hardy:

Pacific Palisades Community Council (PPCC) is the most broad-based community organization and has been the voice of the Palisades since 1973. PPCC submits the following comments concerning the scope of the EIR for the Citywide Housing Element 2021-2029 Update (the Project).

These comments are based on a review of the January 2021 Initial Study by the PPCC Community Plan Update Committee (CPUC); on the Scoping Meeting conducted by the Planning Dept. on January 28, 2021; on the CPUC's recommendation to the full PPCC board; and upon further review, discussion and approval by the PPCC board at its public meeting on February 11, 2021. The sole purpose of this letter is to help assure that the Project EIR adequately analyzes and assesses potential significant environmental impacts and should not be deemed as either supporting or opposing the Project. PPCC has not taken a position on the merits of the Project.

We do, however, have a number of concerns, as outlined below.

Density / Public Safety Concerns: Pacific Palisades is a scenic, largely residential / R-1 and RE zoned community located **entirely in the Very High Fire Hazard Severity Zone (VHFHSZ)**. There are only two main routes of ingress and egress to and from the Palisades as a whole: Sunset Blvd. and Temescal Canyon Blvd. (to PCH). Many of our neighborhoods (including those located in hillsides as well as those in "flat" areas) have substandard streets and only one point of ingress and egress. We have long experienced significant problems with congestion during wildfire evacuations, most recently during the serious Palisades and Getty fires in fall 2019. For these reasons, PPCC has consistently opposed legislation that would mandate increased housing density in Pacific Palisades on public safety grounds. Our Councilmember Mike Bonin has supported us and agrees that increasing housing density in the VHFHSZ would be unsafe and inappropriate.

Despite the City's emergency evacuation plans and good intentions, due to human error the best laid plans sometimes don't succeed. An example occurred in Pacific Palisades during the 2019 Getty Fire, when some of our neighborhoods were under mandatory evacuation orders and the main evacuation route out of the Palisades (south on PCH towards Santa Monica) was mistakenly blocked by LA County Sheriff's officers and the City's emergency management team, leading to seriously clogged traffic conditions and diversion of traffic north and east back into the projected track of the fire. Although the blockage was temporary, hundreds of residents were prevented from accessing a safe and sensible route out of the area. Any emergency during heavy rush hour or beach day traffic on PCH or Sunset Blvd. only adds to the high risk to public safety. Additional housing density could conceivably exacerbate these types of conditions in future evacuations. This issue should be addressed in the EIR.

Community Plan Concerns: The communities of Pacific Palisades and Brentwood share one Community Plan – the Brentwood-Pacific Palisades Community Plan (the BPPCP). Pacific Palisades also has a Specific Plan – the Pacific Palisades Commercial Village and Neighborhoods Specific Plan (the PPSP). The process of updating these plans has not yet begun; City officials have advised us that the BPPCP update will not occur this year and will likely not even begin until an unspecified time much later in the future, long after the October 15, 2021, deadline for completion of the Project/Housing Element Update.

We note that the Notice of Preparation (NOP) of the draft EIR for the Project states that anticipated rezoning of sites to accommodate additional required housing “will need to be completed by 2024 and will likely be accomplished through updates to the City’s Community Plans, an update to the City’s Density Bonus program, targeted zone changes and zoning ordinances, and updates to specific plans and overlays” (NOP, p. 4). We are concerned that rezoning and/or other updates or changes may occur in order to accommodate additional required housing, and a number may even be assigned to the Palisades, before the process of updating the BPPCP and PPSP has even started and without adequate input or involvement of the Palisades community.

Project Concern: We understand that rezoning to accommodate additional required housing (from 419,261 to 429,261 units) “may occur **anywhere in the City** where residential uses are permitted,” although the program will “prioritize opportunities for rezoning or development incentives in areas that are located in a Transit Priority Area, near major job centers and in higher resource areas” (NOP, p. 4). **These categories are not static;** in fact, “high resource areas” are often defined as those with higher incomes, good schools and other quality amenities (characteristics which are often used to describe the Palisades). Under any of these criteria, it is not unreasonable to conclude that rezoning of Pacific Palisades, to add a currently unknown but possibly high number of additional housing units, may occur in connection with the Project – thus posing a potentially significant risk to public safety due to increased density in the VHFHSZ, as described above.

Based on these concerns, PPCC disagrees with certain findings in the Initial Study of “less than significant impact” and requests that the Project EIR specifically analyze and evaluate the topics specified below.

1 (a) and (b) – Aesthetics. PPCC disagrees with the finding that impacts on (a) scenic vistas and/or (b) scenic resources would be less than significant. The Palisades area encompasses bluffs above Pacific Coast Highway with views of the Pacific Ocean and nearby canyons; neighborhoods in the hillsides of the Santa Monica Mountains with panoramic mountain, canyon, city and ocean views; and a designated scenic corridor, Sunset Blvd., where the public may enjoy many of these scenic views and resources. Rare and protected native trees (*e.g.*, Torrey Pines, California Sycamores and Coast Live Oaks) are located in some areas along Sunset Blvd. where development has previously been proposed. Depending on the type and location of rezoning and the amount of additional housing that may be assigned, it is not unrealistic to conclude that significant impacts on scenic vistas and resources may occur.

We understand that the Initial Study states that “the Rezoned Sites would generally not be in areas of the City that are adjacent to scenic resources such as the mountainous and beach areas.” However, as noted above, the NOP emphasizes that rezoning may occur “anywhere in the City where residential uses are allowed,” and/or in “higher resource” areas, *i.e.*, rezoning/additional development in areas such as Pacific Palisades is not conclusively ruled out. The EIR should address the potential impact on scenic views and resources from a range of realistic rezoning possibilities/additional housing numbers that may be assigned to Pacific Palisades

9 (f) and (g) – Hazards. PPCC disagrees with the finding that impacts on (f) emergency evacuation and/or (g) exposure to risk of loss, injury or death involving wildland fires would be less than significant. As described above, the entirety of Pacific Palisades is in the VHFHSZ and our

community's routes of ingress and egress are severely limited. We have long experienced serious problems with congestion during wildfire evacuations. Depending on the type and location of rezoning and the amount of additional housing that may be assigned, it is not unrealistic to conclude that significant impacts on emergency evacuation and risk of loss, injury or death involving wildland fires may occur.

We understand that the Initial Study anticipates that existing emergency evacuation plans will be appropriately implemented during emergencies, and that rezoning will "tend to be concentrated in the more densely urbanized portions of the City, and not near the urban wildland interfaces that are subject to fire risk." However, as noted above, the plans are not always appropriately implemented, and the NOP emphasizes that rezoning may occur "anywhere in the City where residential uses are allowed," and/or in "higher resource" areas, *i.e.*, rezoning/additional development in areas such as Pacific Palisades is not conclusively ruled out. The EIR should address the potential impact on emergency evacuation and exposure to risk of loss, injury or death involving wildland fires from a range of realistic rezoning possibilities/additional housing numbers that may be assigned to Pacific Palisades.

20 (a) - (d) – Wildfire. For all of the reasons previously stated, PPCC disagrees with the finding that impacts would be less than significant with respect to evacuation plans and/or exacerbation of wildfire risks (a, b). Depending on the type and location of rezoning and the amount of additional housing that may be assigned, it is conceivable that more infrastructure (additional roads or power lines/other utilities) would be required that may exacerbate fire risk or otherwise impact the environment, or would expose people or structures to other risks (c, d). Although, again, the Initial Study maintains that rezoning/additional development would "largely occur" in other areas of the City, the Study also acknowledges: "it is possible that individual project development sites are identified in any area where the zoning permits residential uses or as part of the Rezoning Program, including lower density residential sites in the vicinity of a Very High Fire Hazard Severity Zones (VHFHSZ)."

In light of the fact that rezoning/additional development in areas such as Pacific Palisades is not conclusively ruled out – and is even acknowledged to be a possibility -- we must request, based on our community's long experience with wildfires and evacuation issues, that the EIR address the potential impacts involving wildland fires from a range of realistic rezoning possibilities/additional required housing numbers that may be assigned to Pacific Palisades.

Thank you for your consideration.

Sincerely,

David Card
Chair, Pacific Palisades Community Council
Chair, PPCC Community Plan Update Committee
310-508-3681

cc: Hon. Mike Bonin, Councilmember, CD 11
Michelle Bisnoff, Chair, Brentwood Community Council

Via email: mike.bonin@lacity.org

Via email: bisnoff@gmail.com

End D R A F T Comment Letter