



# PACIFIC PALISADES COMMUNITY COUNCIL

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September 7, 2021

City of Los Angeles, Department of City Planning (DCP)  
Attention: Cally Hardy, City Planning Associate  
Via email to: [housing.element@lacity.org](mailto:housing.element@lacity.org)

and

Los Angeles City Planning Commission  
Via email to: [cpc@lacity.org](mailto:cpc@lacity.org)

Re: Comments on the Draft Housing Element 2021-2029 Update (“Draft HE”) and the Draft EIR prepared by City of Los Angeles Department of City Planning with the assistance of Rincon Consultants, Inc. July 2021 (the “Draft EIR”)

DCP and Planning Commission:

Pacific Palisades Community Council (“PPCC”) is the broadest-based Palisades community organization, representing approximately 25,000 stakeholders. PPCC submits the following comments concerning the Draft EIR for the Draft HE and Safety Element Update, as well as the Draft HE and the Safety Element Updates. These comments are based upon a review of the documents by the PPCC Executive Committee and by the concerns and positions stated in PPCC’s February 12, 2021 comment letter.<sup>1</sup>

Our comments are also based on the letter submitted on September 6, 2021 in this matter by Brentwood Community Council (BCC) (9/6 BCC Letter).<sup>2</sup> Brentwood is a community to the immediate east of Pacific Palisades. We share a community plan – the Brentwood-Pacific Palisades Community Plan (BPPCP) – and we also share common concerns related to wildfire and evacuation hazards.

Specifically, PPCC shares the following concerns and comments as expressed in the 9/6 BCC letter:

- The concerns expressed in the comments under the heading “*The Draft EIR is deficient as the Draft Housing Element Update is Missing Critical Data.*”
- The concerns expressed under the heading “Draft EIR Elements: 4.9. Land Use and Planning.”

We note that the BPPCP has not been scheduled for an update yet; we are still completely unaware of the City’s land use and zoning plans for our area.

- The concerns expressed under the heading “Draft EIR Elements: 4.11. Population and Housing.”
- The concerns expressed under the heading “Draft EIR Elements: 4.12. Public Services – Fire.”
- The concerns expressed under the heading “Draft EIR Elements: 4.17. Wildfire.”

In this regard, we appreciate that the Draft EIR expressly recognizes comments previously submitted by PPCC with respect to wildfire impacts. We also appreciate the following statement: “Environmentally sensitive areas,

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<sup>1</sup> <http://pacpalicc.org/wp-content/uploads/2021/02/PPCCHousing-Element-Comment-Letter.pdf>.

<sup>2</sup> [https://drive.google.com/drive/folders/1FW1Zq\\_nSU1c3MGqUh3AhKJuwFO3uTr](https://drive.google.com/drive/folders/1FW1Zq_nSU1c3MGqUh3AhKJuwFO3uTr)

including Very High Fire Hazard Severity Zones (VHFHSZ) and areas vulnerable to sea level rise, will be excluded from the Rezoning Program, even if they have overlap with the above-described growth areas and higher resource areas.”

We reiterate that 100% of Pacific Palisades is within the Very High Fire Hazard Severity Zone (VHFHSZ). Pacific Palisades otherwise shares the same conditions noted in issues b) – g) under the heading “4.17. Wildfire” of the 9/6 BCC Letter.

We further agree with the concluding sentences of the 9/6/21 BCC Letter, regarding prioritizing the use of surplus City property for affordable housing,

For all of these reasons, we respectfully submit that Pacific Palisades should be excluded from the Rezoning Program.

Thank you for your consideration and attention to our comments and concerns.

Sincerely,

Executive Committee, Pacific Palisades Community Council

David Card, Chair

Christina Spitz, Secretary

David Kaplan, Vice-Chair

John Padden, Organization Representative (P.R.I.D.E.)

Richard G. Cohen, Treasurer

Joanna Spak, Elected Representative (Area 1; Castellammare, Paseo Miramar)