



# MIKE BONIN

City of Los Angeles  
Councilmember, Eleventh District

June 28, 2018

David Ambroz, President  
Los Angeles City Planning Commission  
% Commission Secretariat  
200 N. Spring Street, Room 532  
Los Angeles, CA 90012  
**Mail Stop 395**

Dear Honorable Commissioners:

I write in opposition to the proposed mixed use project at 138 Culver Drive located in Playa del Rey, and I urge you to support the appeal before you today. I have three significant and substantial concerns with the proposed project: Compliance with the Coastal Act; public benefits related to use of the right-of-way; and, groundwater issues exacerbated by site dewatering.

## **Compliance with the Coastal Act**

The project is located in the Playa Del Rey Commercial District, which runs through the Del Rey Lagoon area within the Westchester - Playa Del Rey Community Plan. The Playa Del Rey Commercial District is identified in the Community Plan as an area with special design considerations. Specifically, development should be small-scale, and building heights are limited to a maximum of 36 feet. The Community Plan further states that the all of the specific design measures should be implemented through the future Coastal Land use Plan (LUP). Community Plan Objective 18-1, Policy 18-1.1 is to prepare a Local Coastal Program for the Westchester - Playa del Rey Coastal Zone, to consist of a Land Use Plan defining policy and a Local Implementation Plan including implementing ordinances. In addition, the Program under Policy 18.1-1 identifies the Del Rey Lagoon Specific Plan as being approved in concept by the Los Angeles City Council as a policy document to be considered in discretionary approvals. The Del Rey Lagoon Specific Plan, although not formally adopted by the City Council after the Coastal Commission approved it with revisions, has been consistently adhered to by both the City and the Coastal Commission with regard to policies such as a 37 foot height limitation. The project is also located in the Coastal Zone, thus is subject to the California Coast Act of 1976. Chapter 3 of the Coastal Act requires that permitted development is designed to protect views and to be visually compatible with the character of the surrounding areas.

The project, as currently designed, reaches heights of 48 feet, which far exceeds the 36 foot height limitation specified in the Community Plan and the 37 foot height limitation in the Del Rey Lagoon Specific Plan. It is also completely out of scale and character with the surrounding community of low rise commercial and two- to three-story residential. If approved, this project will open the floodgates to additional over-height and out-of-scale projects in the area, thus severely curtailing the city's future ability to create a Coastal Land Use Plan, and commensurate Local Coastal Plan, which is reflective of the Playa Del Rey beach community and adheres to Coastal Act mandates.

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### **Public Benefits Related to Use of the Right-of-Way**

Regarding the proposed right-of-way vacation of Culver Boulevard, I concur with the Neighborhood Council of Westchester/Playa del Rey which submitted a Community Impact Statement to support the appeal and oppose the right-of-way vacation request. The existing right-of-way serves a public purpose by providing the travel lanes necessary for commuter traffic to and from the Playa Vista development. The right-of-way could also serve a future public purpose by providing space for additional bicycle lanes, beach parking, and/or neighborhood parklets. Because of current and potential future public purpose for the existing right-of-way, I urge you to deny this request.

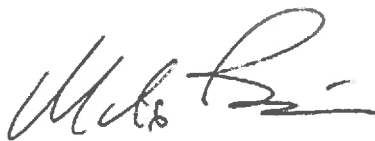
### **Dewatering Impacts on Groundwater**

Also of concern is the groundwater level at the site. According to two separate reports submitted to the applicant or applicant's representative, in 2015, the groundwater at the site ranges from about 5 feet to 8 feet below the existing ground surface. The proposed project, as currently designed, includes a subterranean garage. Dewatering plans for the construction phase of the project have been submitted; however, dewatering plans for the operation of the building have not been submitted. Further, it is acknowledged that there is a toxic groundwater plume emanating from a nearby site that formerly housed a dry-cleaning business. However, there has been no study or evaluation regarding the impact of ongoing dewatering on the migration of this toxic plume. This is uncertainty is concerning, given the potential and very grave public health and safety impacts. I would request that you require additional study on this issue.

I stand with the residents of Playa del Rey and the Neighborhood Council of Westchester Playa and urge you to both deny the vacation and support the appeal before you today.

Please contact my Planning Director Krista Kline, at (213) 473-7011 or [krista.kline@lacity.org](mailto:krista.kline@lacity.org) if you have any questions regarding this request. Thank you for your consideration.

Regards,



**MIKE BONIN**  
*Councilmember, 11<sup>th</sup> District*

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