Appendix A: Comment Letters

October 19, 2019

PLUM Councilmembers
John Ferraro Council Chamber, Room 340 City Hall
Los Angeles, California 90012

Regarding the Southern California Flower Market, ENV-2016-3991-EIR

Dear Honorable Councilmembers,

As a young person who commutes to work in Downtown LA, I am currently looking to move downtown in order to avoid long commute times. Like many others in my age range, however, I am priced out of the expensive Arts District and the South Park area. The Flower Market project appears to provide a new opportunity to live Downtown.

I am resubmitting this letter to the Planning and Land Use Committee to reiterate my strong support for the Southern California Flower Market project and to encourage you to approve the project as proposed. Unfortunately, many young urban residents are limited in the selection of good housing opportunities close to work, especially when it comes to affordability. This project helps to alleviate such pressures by introducing new affordable housing options into the Flower District neighborhood.

In addition to better housing options in the area, this project will help to improve the livability and walkability of the Flower District. The proposed pedestrian level amenities and open space improve the aesthetic of the streetscape. The project will contribute to the overall improvement of Downtown.

Please support new housing opportunities to benefit the younger residents that are tirelessly searching for affordable options. Please support this project.

Regards,

Alexandra Hack



October 28, 2021

Los Angeles City Council John Ferraro Council Chamber, Room 340 City Hall Los Angeles, California 90012

Re: Southern California Flower Market, ENV-2016-3991-EIR

Dear Honorable City Councilmembers,

On behalf of the LA Fashion District Business Improvement District, we are writing to once again express support for Planning Case # ENV-2016-3991-EIR, Southern California Flower Market located at 709-765 S. Wall Street, 306-326 E. 7th Street and 750-752 S. Maple Ave, Los Angeles, CA 90014. The LA Fashion District BID is a non-profit organization that represents 4000+ businesses and 700+ property owners. It provides cleaning and security services for the 100 block district, including the Flower District.

The Southern California Flower Market project is a transformative project for our district. The project is located adjacent to a "residential hub". The redevelopment is innovative in scope by adding much-needed housing to downtown Los Angeles while maintaining its roots in the flower markets. This project will also add more of a 24/7 vibe to a vibrant, mostly daytime neighborhood.

Since the previous approval two years ago, our neighborhood has seen an increase in homeless impacts, civil unrest, and pandemic that has decimated business. Our District is in need of a project as presented here. This previously approved investment the Flower Market is making is exactly what our neighborhood needs. Vote yes again and allow this project to break ground.

Respectfully,

Anthony Rodriguez

Executive Director

cc: Fashion District Board of Directors

Willie Sanchez Wholesale Flowers 755 Wall Street, Los Angeles, CA 90014 213,627,5534

October 25, 2021

City Council- Planning and Land Use Management Committee John Ferraro Council Chamber, Room 340 City Hall Los Angeles, California 90012

RE: Case File - ENV-2016-3991-EIR

Dear PLUM Commissioners,

My name is Willie Sanchez and I have been a tenant in the Flower Market for over 50 years. As a matter of fact, I was the first Latino tenant permitted to open a wholesale flower business in the Flower Market during the 1970's. Back then, the only tenants in the market were actual flower growers. But because of the relationships I made with a lot of the Japanese American flower growers back then, they advocated for me to have my own space. I am also proud to say my family and me are shareholders in the Flower Market as well.

Since I am a first-generation Mexican immigrant, my experience is very similar to the Japanese immigrants who came before me in the early 1900's. That is why I believe they gave me a chance to open a business in the market. Today, almost half of our tenant base is of Latino descent. Therefore, it is vital to the entire community that you approve this project.

Since my son and daughter have taken over the business, it is important the Flower Market survives so their children will have the same opportunities given to me and my family. Please approve this project so our traditions and cultural values will live on for the next 100 years.

Sincerely,

Willie Sanchez



October 20, 2021

City Council- Planning and Land Use Management Committee
John Ferraro Council Chamber, Room 340 City Hall
Los Angeles, California 90012

Dear Honorable Los Angeles PLUM Committee members,

I hope this letter finds you well as we all endured and prepare for the end of an almost 2-year global pandemic that has impacted us all immensely. I am once again writing to you today, during the second Comment Period for this project and almost two years since my last letter to reiterate my unequivocal support for the previously approved Southern California Flower Market project (ENV-2016-3991-EIR) and to again encourage you approve the project as unanimously approved by Council on 11/26/2019.

I have owned and operated several family businesses in downtown since 1986 and my family has been in business in the area since 1948. Currently, I'm a board member of the LA Fashion District (BID) and the owner of the California Flower Mall located within two blocks of the Project Site. As a neighboring property owner, we welcome and clamor for the improvements this project will bring to the neighborhood as they will have numerous positive effects on my business as well as the overall area.

For many years, we have worked very hard with our fellow business owners along with the Fashion District (BID) to provide a clean and safe environment for business to survive and supporting our local economy, despite the day-to-day issues we all face. These issues have only continued to explode since this project's previous approval due to the impacts of Covid and rising housing costs. The day-to-day issues we face cannot be addressed by one project, but the investment the Flower Market brings will help to move our local businesses and residents in the right direction. We understand no one is an island, and this positive investment improves the quality of life for all local stakeholders.



By once again supporting this previously approved development, you support the much-needed attention and investment in and around our neighborhood. This project, like many others close by, will increase business vitality and local amenities in our area, provide much needed housing in the downtown core, and most importantly provide a clean and safe environment for the area and stakeholders.

We look to you to approve this project again and let the positivity of investment finally take shape in a neighborhood that for far too long has been neglected.

Vote yes and support our neighborhood.

Regards,

Mark Chatoff

President, California Flower Mall

Founding Board Member LA Fashion District (BID)



October 26, 2021

Erin Strelich City of Los Angeles, Dept. of Planning 221 N. Figueroa Street, Suite 1350 Los Angeles, CA 90012

Re: Southern California Flower Market, ENV-2016-3991-EIR

On behalf of the Central City East Association and the Downtown Industrial Business Improvement District (BID), we are writing to once again express support for the previously approved Southern California Flower Market mixed use investment project, Planning Case # ENV-2016-3991-EIR.

The L.A. Downtown Industrial District Business Improvement District (BID) was formed in 1998 by the Central City East Association (CCEA). CCEA is a 501(c)(6) not-for-profit business corporation – the principal advocate for property owners, businesses, employees and residents on 50 blocks of Downtown Los Angeles. CCEA administers the BID, spanning the area from San Pedro Street to Alameda; 3rd to 8th and a portion of Olympic Blvd. The BID is widely recognized as the leading advocate for improving the public safety and maintenance of the industrial area. Our coalition of 600 area property owners invest more than \$3 million annually to supplement City services in an effort to maintain the safety and cleanliness of a business district.

The Southern California Flower Market investment is a game-changing project that shows how far the Flower District has come and the promise of the Flower District to serve future generations of Angelenos. Recognizing that, our BID Board voted its unanimous support of this project on August 29, 2017, and we restate our support now.

The BID urges the City Council to take this opportunity to strongly support housing, investment, and stakeholder amenities that will help the Flower District thrive.

Sincerely,

Estela Lopez
Executive Director



October 24, 2021

City Council- Planning and Land Use Management Committee John Ferraro Council Chamber, Room 340 City Hall Los Angeles, California 90012

RE: ENV-2016-3991-EIR

Dear City Council PLUM Members.

I write to you today to once again voice my support for the proposed Southern California Flower Market project. I encourage you and the full City Council to approve this project,

My wife Kwini and I have owned and operated the Poppy & Rose restaurant in the SoCal Flower Market for over 7 years. We have been touted (numerous times) as one of the best Brunch restaurants in the greater Los Angeles area and pride ourselves as a black owned business. While running my high-end catering company eight years ago, I sought to look for a kitchen to continue growing my business. In 2014, the Flower Market took a chance and leased space to us, and Poppy + Rose was birthed. We have not looked back since and we are in the process of opening our third location in the new San Pedro waterfront development.

Any improvements to the neighborhood that will have a positive impact on our business (which this investment certainly will have) is always welcomed.

For years, we have worked with our fellow business owners to support our local economy while addressing the day to day issues we all face in the area.

By supporting this development, you support the natural growth occurring in and all around our downtown Los Angeles area. This project will not only increase business and local amenities in our area but will provide much needed housing that meets the income level our area desperately needs. Most importantly, this project will provide an increase in security and safety for all neighboring stakeholders by revitalizing the neighborhood.

Please support this project as it encourages the organic and continued growth of our local neighborhoods.

Sincerely,

Michael & Kwini Reed.

Owner, Poppy + Rose

Keep the Southern California Flower Market in Los Angeles





Keith Saito started this petition to Los Angeles City Council

As members of the local Asian American community, we submit this petition and urge the City Council to approve the Flower Market project. In the 1940's, the Japanese families who owned the market nearly lost the property when they were imprisoned in internment camps. They are at risk of losing the property again as they can no longer afford to maintain the upkeep of their old buildings.

PLEASE DO NOT hold the Asian American owners of the Flower Market to a higher standard than applied to other projects. Approve this project today and help the flower market continue on with its storied legacy!

408 have signed. Let's get to 500!



At 500 signatures, this petition is more likely to be featured in recommendations!



Los Angeles City Council: Keep the Southern California Flower ...

f Share on Facebook

- Send an email to friends
- Tweet to your followers
- Copy link

Name	City	State	Postal Co	d Country	Signed On
Keith Saito				US	10/11/2021
Jennifer Luna	Riverside	CA	92506	US	10/11/2021
Andrew Luna	Riverside	CA	92506	US	10/11/2021
Makiko Iwasaki	Manhattan Beach	CA	90266	US	10/11/2021
Christine Kelly	Brea	CA	92821	US	10/12/2021
Connor Kelly	Aliso Viejo	CA	92656	US	10/12/2021
Sally Wen	Woodland Hills	CA	91364	US	10/12/2021
Brenda Choi	Las Vegas	NV		US	10/12/2021
Michelle K	Los Angeles	CA	90015	US	10/12/2021
Justin Lee	Los Angeles	CA	90013	US	10/12/2021
Glenn Osako	Ladera Ranch	CA	92694	US	10/12/2021
Kathy Kurata	Los Angeles	CA	90015	US	10/12/2021
Kailey Cost	North Hollywood	CA	91601	US	10/12/2021
Ray Hughes	Los Angeles	CA	90010	US	10/12/2021
Jodi Mitchell	Ladera Ranch	CA	92694	US	10/12/2021
Saul Lopez	Pasadena	CA	91106	US	10/12/2021
mary yasui yamabe	Playa	CA	90023	US	10/12/2021
Jan Kuroyama	Los Angeles	CA	90046	US	10/12/2021
Amy Lew	Temple City	CA	91780	US	10/12/2021
Mitchell Abe	Los Angeles	CA	90009	US	10/12/2021
Dayna Yamabe	Ladera Ranch	CA	92694	US	10/12/2021
Tommy Ly	Arcadia	CA	91007	US	10/12/2021
Steven Lam	Los Angeles	CA	90031	US	10/12/2021
Kevin Manzo	Brea	CA	92821	US	10/12/2021
Hootan Kia	La Verne	CA	91750	US	10/12/2021
Nathalie Corral-Gonzalez	Yuma		85364	US	10/12/2021
James Miyake	Santa Ana	CA	92704	US	10/12/2021
Cameron Hvass	Snellville		30078	US	10/12/2021
Quinn Watts	Bend		97702	US	10/12/2021
Tom Hinojosa	Los Angeles	CA	90023	US	10/12/2021
Alice Quan	Montebello	CA	90640	US	10/12/2021
jamie fang	Downey	CA	90240	US	10/12/2021
Helen Ota	Los Angeles	CA	90026	US	10/12/2021
Erin WU	Beverly Hills	CA	90210	US	10/12/2021
Randy Nagai	Manhattan Beach	CA	90266	US	10/12/2021
Alexandra Hack	Los Angeles	CA	90026	US	10/12/2021
Jully Lee	Glendale	CA	91205	US	10/12/2021
Aniseth Zapata	Los Angeles	CA	90032	US	10/12/2021
Tina Kay	Santa Monica	CA	90404	US	10/12/2021
Michelle Pow	Los Angeles	CA	90019	US	10/12/2021

Chris Ingram	Murrieta	CA	92562	US	10/12/2021
Kelly Mock	Irvine	CA	92620	US	10/12/2021
Todd Odagawa	Monterey Park	CA	91755	US	10/12/2021
Brian Yamaoka	Santa Barbara	CA	93103	US	10/12/2021
michael palma	Los Angeles	CA	90026	US	10/12/2021
Camryn Sugita	San Francisco	CA	94109	US	10/12/2021
Kay Takano	Seal Beach	CA	90740	US	10/12/2021
Terry Hara	Long Beach,	CA	90808	US	10/12/2021
Lauren Hui	Los Angeles	CA	90006	US	10/12/2021
Gerald Wong	Los Angeles	CA	90032	US	10/12/2021
Summer Esparza	Fontana	CA	92335	US	10/12/2021
Steve Hara	Long Beach	CA	90802	US	10/12/2021
Jordan N	Garden Grove	CA	92840	US	10/12/2021
Ted Matsumoto	Cerritos	CA	90703	US	10/12/2021
Cierra White	Janesville	WI	53545	US	10/12/2021
Lauren Kinkade-Wong	Los Angeles	CA	90032	US	10/12/2021
Rei Umekubo	San Diego	CA	92115	US	10/12/2021
jamouri spencer	high point		27235	US	10/12/2021
Sammy Lee	Canyon Country	CA	91387	US	10/12/2021
Tod Wakamatsu	Los Angeles	CA	90012	US	10/12/2021
Mari Umekubo	Gardena	CA	90247	US	10/12/2021
Josh Standiford	Lake Zurich		60047	US	10/12/2021
Leiton Hashimoto	Chula Vista	CA	91914	US	10/12/2021
Masako Umekubo	Gardena	CA	90247	US	10/12/2021
vincent cherian	ronkonkoma		11779	US	10/12/2021
Alisa Okamoto	Glendale	CA	91205	US	10/12/2021
Annemarie Feliciano	Chicago		60629	US	10/12/2021
Gerald Fukui	Carson	CA	90746	US	10/12/2021
Keith Inatomi	Los Angeles	CA	90043	US	10/12/2021
Kelly Umekubo				US	10/12/2021
Veronica Ota	Sunland	CA	91040	US	10/12/2021
arushi maisuria	University Park		16802	US	10/12/2021
Rik Umekubo	Kathmandu			Nepal	10/12/2021
Richard Dumlao	Dana Point	CA	92629	US	10/12/2021
Joseph Bovino	Miami	FL	33125	US	10/12/2021
Robert Shibata	Fremont	CA	94536	US	10/12/2021
Raj Joshi	Beverly Hills	CA	90210	US	10/12/2021
Bill Lindner	San Rafael	CA	94901	US	10/12/2021
Frank Lee	Fountain Valley	CA	92708	US	10/12/2021
Greg Endow	Carpinteria	CA	93013	US	10/12/2021
Yukie Nitta	Gardena	CA	90247	US	10/12/2021

John Gurung	Los Angeles	CA	90047	US	10/12/2021
Phyllis Trentalange	Huntingdon Valley	PA	19006	US	10/12/2021 10/12/2021
Jennifer Yoshida	Trabuco Canyon	CA	92679	US	10/12/2021
Elora Lyda	North Hollywood	CA	91602	US	10/12/2021
Grace Silva	North Hollwyood	CA	91615	US	10/12/2021
Ted Ohara	Anaheim	CA	92805	US	10/12/2021
Mark Nishinaka	Los Angeles	CA	90042	US	10/12/2021
Pamela Shriver	Los Angeles	CA	90042	US	10/12/2021
Carol Soga	Torrance	CA	90505	US	10/12/2021
Michele Kaneshiro	Harbor City	CA	90710	US	10/12/2021
Sara Hutter	•	CA	92660	US	
Jennifer Thomas	Newport Beach San Leandro	CA	94577	US	10/12/2021
					10/12/2021
Tamlyn Tomita	Los Angeles	CA	91325	US	10/12/2021
Stephanie Nguyen	Lake Forest	CA	92630	US	10/12/2021
Beth Ann Bovino	Brooklyn	NY	11221	US	10/12/2021
Elisa Keller	Los Angeles	CA	90015	US	10/12/2021
Kathryn Kushman	Portland	OR	97229	US	10/12/2021
Ying Ng	Chino	CA	91710	US	10/12/2021
Vivian Lee	North Hollywood	CA	91605	US	10/12/2021
Nancy Araki	San Mateo	CA	94402	US	10/12/2021
Laurie Sale	Los Angeles	CA	90272	US	10/12/2021
Curtis Hitomi	San Gabriel	CA	91775	US	10/12/2021
doria wosk	miami	FL	33116-335		10/12/2021
Estrellita Nera	Peoria		85382	US	10/12/2021
Stephen Kono	Carpinteria	CA	93013	US	10/12/2021
Cesar Frias	Salinas		93901	US	10/12/2021
Marianne Matsuda	Rancho Palos Verdes	CA	90275	US	10/12/2021
Lois Kusunoki	Gardena	CA	90247	US	10/12/2021
BONNIE PATERNOSTER	North Fort Myers		33917	US	10/12/2021
Rick Noguchi	Los Angeles	CA	90012	US	10/12/2021
Maria Iriqui	Pacific Palisades	CA	90272	US	10/12/2021
Mark Nakagawa	Gardena	CA	90248	US	10/12/2021
Jeremy Anderson				US	10/12/2021
vera cheng	Torrance	CA	90504	US	10/12/2021
Marica Snyder	Lomita	CA	90717	US	10/12/2021
Sarina Simon	Malibu	CA	90265	US	10/12/2021
盈盈 刘	New York			America	10/12/2021
Paul Blackburn	Elizabethtown	KY	42701	US	10/12/2021
Valerie Ouchida	Sacramento	CA	95831	US	10/12/2021
Jane Taguchi	Los Angeles	CA	90039	US	10/12/2021
Kurt Yamamoto	Culver City	CA	90230	US	10/12/2021

Mike Hirahara	Torrance	CA	90503	US	10/12/2021
Jilka Pollack	San Francisco	CA	94102	US	10/12/2021
Andrew Carrillo	Canoga Park	CA	91304	US	10/12/2021
Judy Higashi	Los Angeles	CA	90020	US	10/12/2021
Ozaki Pami	Malibu	CA	90265	US	10/12/2021
June Sale	Los Angeles, CA	AL	90069	US	10/12/2021
Cathy Unger	Los Angeles	CA	90024	US	10/12/2021
Kelly King	Marina Del Rey	CA	90292	US	10/12/2021
Chiara Umekubo	Pacific Palisades	CA	90272	US	10/12/2021
Jane Leu	Los Angeles	CA	90023	US	10/12/2021
Stacey Inouye	Sacramento	CA	95823	US	10/13/2021
Kelly Hanabusa	Gardena	CA	90247	US	10/13/2021
NORIKO KAMIMURA	Gardena	CA	90248	US	10/13/2021
David YAMAHATA	Antioch	CA	94531	US	10/13/2021
Taisen Jimerson	Lansing		60438	US	10/13/2021
Tayla Bibb	Bowling Green		42104	US	10/13/2021
Cynthia Cost	Folsom	CA	95630	US	10/13/2021
Sean Slamon	Carson City	NV	89701	US	10/13/2021
Tricia Tanaka	Pasadena	CA	91105	US	10/13/2021
Jason Saito	NY	NY	10028	US	10/13/2021
Shannon Wong	Los Angeles	CA	90012	US	10/13/2021
Emma Sakuda	Los Angeles	CA	90003	US	10/13/2021
Tracie Chooey	San Francisco	CA	94121	US	10/13/2021
Douglas Montgomery	Torrance	CA	M5J	US	10/13/2021
ZA	Los Angeles	CA	90245	US	10/13/2021
Richard M. Murakami	Monterey Park	CA	91754	US	10/13/2021
Calimay Pham	Los Angeles	CA	90003	US	10/13/2021
Grace Yamamura	Santa Monica		90405	US	10/13/2021
Kim Hayashi	Yorba Linda	CA	92886	US	10/13/2021
Denise Iketani	Granada Hills	CA	91344	US	10/13/2021
Sandy Miyake	Santa Ana	CA	92704	US	10/13/2021
Eiko Nakano	Los Angeles	CA	90004	US	10/13/2021
Jeanne Warkentin	Mission Viejo	CA	92691	US	10/13/2021
Lili Huang	Glendale	CA	91203	US	10/13/2021
Joyce Nakashima	Los Angeles	CA	90049	US	10/13/2021
John Shimabuku	Gardena	CA	90247	US	10/13/2021
Luci-Ellen Chun	Rosemead	CA	91754	US	10/13/2021
Angela Ko	New York	NY	10022	US	10/13/2021
Grant Nakagawa	Sherman Oaks	CA	91423	US	10/13/2021
C. Hayashi	Yorba Linda	CA	92887	US	10/13/2021
Robin Vensel	Frisco	TX	75034	US	10/13/2021

Lindsay Warkentin	San Clemente	CA	92673	US	10/13/2021
brian sniegowski	los angeles	CA	90026	US	10/13/2021
Bill Hara	Seal Beach	CA	90740	US	10/13/2021
Faye Rye	Torrance	CA	90505	US	10/13/2021
Richard Sparkes	Grand Blanc	MI	48439	US	10/13/2021
Kaitlin H		CA	.0.05	US	10/13/2021
Randy Bennett	Colorado Springs	CO	80924	US	10/13/2021
Gary Ono	Los Angeles	CA	90012-423		10/13/2021
Masako Koga	Monterey Park	CA	91755	US	10/13/2021
Ryan Guinn	Los Angeles	CA	90019	US	10/13/2021
Irene Nakagawa	Sierra Madre	CA	91024	US	10/13/2021
Angie Yang	La Canada	CA	91011	US	10/13/2021
Tomoko Hatae	Rancho Palos Verdes	CA	90275	US	10/13/2021
MD WOODS	Clackamas	OR	97015	US	10/13/2021
Sally Kim	Burbank	CA	91501	US	10/13/2021
Michelle Lee	South Pasadena	CA	91030	US	10/13/2021
Nikki Kodama	Gardena	CA	90248	US	10/13/2021
Scott Endow	Woodland Hills	CA	91367	US	10/13/2021
Sasha Hjerpe	Bandon	OR	97411	US	10/13/2021
Camille Hiquiana	Woodland Hills	CA	91367	US	10/13/2021
Linda Comfort	San Clemente	CA	92673	US	10/13/2021
Richard Watanabe	Arcadia	CA	91006	US	10/13/2021
Alan Hong	Los Angeles	CA	90002	US	10/13/2021
Charlene Ishikawa	Chatsworth	CA	91311	US	10/13/2021
Ellen Mochizuki	Pasadena	CA	91108	US	10/13/2021
Staci Matsui	Montebello	CA	90640	US	10/13/2021
Diane Yokoyama	Los Angeles	CA	90003	US	10/13/2021
John Ishikawa	Chatsworth	CA	91311	US	10/13/2021
Cindy Saisho	Monterey Park	CA	91754	US	10/13/2021
Desiree Osugi	Monterey Park	CA	91754	US	10/13/2021
Karen Nakatani	Montebello	CA	90640	US	10/13/2021
Sophia Ly	Los Angeles	CA	90003	US	10/13/2021
Lindsey Sugimoto	Los Angeles	CA	90043	US	10/13/2021
T Louie	Monterey Park	CA	91754	US	10/13/2021
Kim Kato	Los Angeles	CA	90022	US	10/13/2021
Ronald Carver	Portland	OR	97211	US	10/13/2021
Robert Covarrubias	Los Angeles	CA	90068	US	10/13/2021
Ricky Matsui	Montebello	CA	90640	US	10/13/2021
Ivy Au	Monterey Park	CA	91755	US	10/13/2021
Mia Natsume	El Segundo	CA	90245	US	10/13/2021
Eva Rodriguez	Los Angeles	CA	90016	US	10/13/2021

Jean Tsutsui	Northridge	CA	91325	US	10/13/2021
Lisa Chong	Los Angeles	CA	90058	US	10/13/2021
Dana Simone	Hillsdale	NJ	7642	US	10/13/2021
Emily Glisson	Raleigh	NC	27613	US	10/13/2021
Renee Simone-Wiley	-			US	10/13/2021
Hazel Tate	Los Angeles	CA	90018	US	10/13/2021
Kathleen Nishida	Irvine	CA	92782	US	10/13/2021
Doreen Ogata	Yorba Linda	CA	92886	US	10/13/2021
Ashley Arikawa	Los Alamitos	CA	90720	US	10/13/2021
Ron Wakabayashi	Harbor City	CA	90710	US	10/13/2021
Katina Critopoulos	Rocklin	CA	95765	US	10/13/2021
Laura Higashi	Whittier	CA	90602	US	10/13/2021
James Imamoto	Monterey Park	CA	91754	US	10/13/2021
Daryl Fujii	Los Angeles	CA	90026	US	10/13/2021
Karen Cheng	Los Angeles	CA	90006	US	10/13/2021
So Vu	San Francisco	CA	94124	US	10/13/2021
Joann Cordeiro	Tustin	CA	92782	US	10/13/2021
Bruce Fujinami	San Diego	CA	92129	US	10/13/2021
Gerald Harada	Cypress	CA	90630	US	10/13/2021
Lauretta Padgett	Sullivan	IN	47882	US	10/13/2021
Yusa Chang	San Marino	CA	91208	US	10/13/2021
Betty Oyama	Alhambra	CA	91801	US	10/13/2021
Dale Beasley	Dinuba	CA	93618	US	10/13/2021
Michi Fu	Monterey Park	CA	91754	US	10/13/2021
Hugo Castro	Miami	FL	33234	US	10/13/2021
M A Jones	Tucson	AZ	85745	US	10/13/2021
Jonathan Kono	Carpinteria	CA	93013	US	10/13/2021
Reggie De Leon	Santa Fe Springs	CA	90670	US	10/13/2021
Juliann Lee	Alhambra	CA	91801	US	10/13/2021
Susan Fukushima	Placentia	CA	92870	US	10/13/2021
Vicki Dorvall	Huntington Beach	CA	92649	US	10/13/2021
Francis Yamazaki	Culver City	CA	90230	US	10/13/2021
Bill Shishima	Huntington Park	CA	90255	US	10/13/2021
Pat Honkawa	Los Angeles	CA	90272	US	10/13/2021
Gladys Endow	Carpinteria	CA	93013	US	10/14/2021
Bradley Nishida	Los Angeles	CA	90005	US	10/14/2021
Wendy Mori	Los Angeles	CA	90008	US	10/14/2021
Ken Nishida	Irvine	CA	92604	US	10/14/2021
Patricia Takahashi	Sacramento	CA	95821	US	10/14/2021
Yaeko Tanaka	Torrance	CA	90504	US	10/14/2021
Stacy Walker	Los Angeles	CA	90230	US	10/14/2021

James Takahashi	Walnut Creek	CA	94596	US	10/14/2021
Kim Siegmund	San Marino	CA	91108	US	10/14/2021
Jeff Yamahata	Torrance	CA	90505	US	10/14/2021
Barbara Clayton	Burbank	CA	91501	US	10/14/2021
Wayne Kitagawa	Huntington Beach	CA	92649	US	10/14/2021
Janet Chikami Maloney	Pasadena	CA	91104	US	10/14/2021
Russel Fujii	Los Angeles	CA	90031	US	10/14/2021
Christine Nakashima	Oakland	CA	94610	US	10/14/2021
Sharon James	San Pedro	CA	90732	US	10/14/2021
Elaine Ganiko	Yorba Linda	CA	92886	US	10/14/2021
DAN Fukushima	Placentia	CA	92870	US	10/14/2021
Linda Murata	Los Angeles	CA	90045	US	10/14/2021
Rex Matsui	Los Angeles	CA	91754	US	10/14/2021
James Kono	Santa Rosa	CA	95403	US	10/14/2021
Katelyn McDonald	Carpinteria	CA	93013	US	10/14/2021
Glenn Fukushima	Torrance	CA	90503	US	10/14/2021
Dustin Letinsky	Los Angeles	CA	90014	US	10/14/2021
Glenn Sanada	Torrance	CA	90504	US	10/14/2021
Wayne Munekiyo	Dyer	NV	89010	US	10/14/2021
Aziz Gutierrez	Middletown	CT	6457	US	10/14/2021
Mark Kitagawa	Carpinteria	CA	93013	US	10/14/2021
Candace Murata	Palo Alto	CA	94025	US	10/14/2021
Jaime Honkawa	Los Angeles	CA	90026	US	10/14/2021
James Timothy Davis	Washington	DC	20011	US	10/14/2021
Traci Kitagawa	Oakland	CA	94603	US	10/14/2021
Rene Van Wingerden	Los Angeles	CA	90014	US	10/14/2021
Janet Takahashi	Yorba Linda	CA	92886	US	10/14/2021
Jordan Tellez	Windsor	CA	95492	US	10/14/2021
Jennifer Koppera	Los Angeles	CA	90035	US	10/14/2021
Giuseppe Bonfiglio	Santa Barbara	CA	93101	US	10/14/2021
Mable Wakamatsu	Houston	TX	77002	US	10/14/2021
Justin Kitagawa	Ojai	CA	93023	US	10/14/2021
Rebekah Nelson	Santa Rosa	CA	95403	US	10/14/2021
Sheri Nakano	Fountain Valley	CA	92708	US	10/14/2021
Monica Gutierrez	Los Angeles	CA	90036	US	10/14/2021
Paul Fukushima	Norwalk	CA	90650	US	10/14/2021
Robert Groom	Phoenix	AZ	85018	US	10/14/2021
Sandra Nagamoto	Irvine	CA	92602	US	10/14/2021
Judy Phan	El Cajon	CA	92019	US	10/14/2021
Megan Kitagawa	Ojai	CA	93023	US	10/14/2021
Bailey Diioia	Ojai	CA	93023	US	10/14/2021

Rowan Diioia	Garden Grove	CA	92840	US	10/14/2021
Anthony Diioia	Santa Barbara	CA	93101	US	10/14/2021
Kalia Diioia	Santa Barbara	CA	93101	US	10/14/2021
Elijah Diioia	Santa Barbara	CA	93101	US	10/14/2021
Naoto Tashiro	Los Angeles	CA	90034	US	10/14/2021
Clement Hanami	los angeles	CA	90012	US	10/14/2021
Michael Brooks	McDonough	GA	30252	US	10/14/2021
Louie Garcia	Los Angeles	CA	90011	US	10/14/2021
Vicki Diioia	Santa Barbara	CA	93101	US	10/14/2021
Vicki Kubota	Santa Barbara	CA	93105	US	10/14/2021
Eiden Kubota	Carpinteria	CA	93013	US	10/14/2021
Patricia Roche-Fukushima	Ladera Ranch	CA	92694	US	10/14/2021
Jonathan Kubota	Carpinteria	CA	93013	US	10/14/2021
Warren Nishimura	Carpinteria	CA	93013	US	10/14/2021
Jane Bongiorno	Los Alamitos	CA	90720	US	10/14/2021
Norman Noji	South Pasadena	CA	91030	US	10/14/2021
Diana Fukushima	Norwalk	CA	90650	US	10/14/2021
Karl Kim	La Mirada	CA	90638	US	10/14/2021
Katerina Andrianos	Downey	CA	90240	US	10/14/2021
Colleen Miyano	Gardena	CA	90247	US	10/14/2021
Dante Gonzalez	Carpinteria	CA	93013	US	10/14/2021
Alice Kadowaki	Anaheim	CA	92807	US	10/14/2021
Denise Kono	Santa Barbara	CA	93105	US	10/15/2021
Susan Gregor	Upland	CA	91784	US	10/15/2021
Jamie Sakamoto	Glendale	CA	91205	US	10/15/2021
Joyce Edson	Pasadena	CA	91105	US	10/15/2021
Toby Chi	Culver City	CA	90232	US	10/15/2021
Christy Ann Clark Scaife	Hawthorne	CA	90250	US	10/15/2021
Hiroko Baba	Los Angeles	CA	90025	US	10/15/2021
Makoto Kotani	Los Angeles	CA	90005	US	10/15/2021
Sharlene Siegel	Long Beach	CA	90815	US	10/15/2021
Julie Firth	Redmond	WA	98052	US	10/15/2021
Robert Kadomatsu	La mirada	CA	90638	US	10/15/2021
Deborah Kantor		CA	90278	US	10/15/2021
Linda Becker	Los Angeles	CA	90014	US	10/15/2021
Bryan Mimaki	Camarillo	CA	93010	US	10/15/2021
Tori Leon	Los Angeles	CA	90042	US	10/15/2021
Lyda Eddington	Los Angeles	CA	90045	US	10/15/2021
pattie kasahara	Los Angeles	CA	90026	US	10/15/2021
Tammy Chan	Monterey Park	CA	91754	US	10/15/2021
Vanessa Mihara	Los Angeles	CA	90001	US	10/15/2021

ELIZABETH DOOMEY	Los Angeles	CA	90036	US	10/15/2021
Yoshiko Kawada	Granada Hills	CA	91344	US	10/15/2021
Barbara Yasuda	South Pasadena	CA	91030	US	10/15/2021
Shirley Docken	North Hills	CA	91343	US	10/15/2021
Nancy Oda	Los Angeles	CA	90011	US	10/15/2021
Jan Masamoto	Rock Island	IL	61201	US	10/15/2021
BettyAnn Uematsu	San Clemente	CA	92673	US	10/15/2021
Jill Hiraizumi	Irvine	CA	92603	US	10/15/2021
Drbob Schaefer	Orinda	CA	94563	US	10/15/2021
stephen kagawa	Monrovia	CA	91016	US	10/15/2021
Debbie Henson	Los Angeles	CA	93535	US	10/15/2021
Delia Nakayama	new Orleans	LA	70116	US	10/15/2021
Laurie Cornell				US	10/15/2021
Cathy Fujimoto	Granada Hills	CA	91344	US	10/16/2021
stacie tamaki	Caledonia	MI	48838	US	10/16/2021
Karen Takeiri-Pells	North Hollywood	CA	91605	US	10/16/2021
Spencer Horiuchi	West Covina	CA	91790	US	10/16/2021
Mariko Bird	Los Angeles	CA	91325	US	10/16/2021
Kim Froehlich	Calabasas	CA	91302	US	10/16/2021
Madeline Chandler	Walnut	CA	91788	US	10/16/2021
Kathleen Fleming	Torrance	CA	90501	US	10/16/2021
stevie hirsch	Los Angeles	CA	91423	US	10/16/2021
John Gota	Glendale	CA	91202	US	10/16/2021
Ngoc Hanh Pham	Gardena	CA	90247	US	10/16/2021
Kathleen Tokudomi	El Segundo	CA	90245	US	10/16/2021
Flo Kojima	Torrance	CA	90505	US	10/16/2021
Nelson Murata	Camarillo	CA	93012	US	10/16/2021
John Tajiri	Westlake Village	CA	91362	US	10/16/2021
Madelon Kranz	Studio City	CA	91604	US	10/17/2021
Natasha Nguyen	Hawthorne	CA	90250	US	10/17/2021
May Wood	Valencia	CA	91355	US	10/17/2021
Mihoko Tanabe	West Covina	CA	91792	US	10/17/2021
D Sakamoto	Alexandria	VA	22311	US	10/17/2021
Craig Osugi	Rosemead	CA	91770	US	10/17/2021
Kyle Yano-Goss	Rancho Cordova	CA	95742	US	10/17/2021
Stacy Osugi	Los Angeles	CA	90068	US	10/17/2021
Junko Kubota	Monterey Park	CA	91754	US	10/17/2021
Jesse Montoya	Whittier	CA	90605	US	10/17/2021
Veronica Rodarte	Agoura Hills	CA	91301	US	10/17/2021
Chris Tanimoto	Culver City	CA	90230	US	10/17/2021
Erik Osugi	Los Angeles	CA	90020	US	10/17/2021

Davine Suzuki	Monterey Park	CA	91754	US	10/17/2021
Jackie Miyauchi	Los Angeles	CA	90065	US	10/17/2021
Bryan Kimura	San Gabriel	CA	91754	US	10/18/2021
Mariko Yamashiro	Rosemead	CA	91770	US	10/18/2021
Ronald Kita	Torrance	CA	90505	US	10/18/2021
Janice Rodan	Merchantville	NJ	8109	US	10/18/2021
Steven Tsuruoka	San Mateo	CA	94403	US	10/18/2021
Keith Shintani	Orange	CA	92867	US	10/18/2021
Crandal Jue	Los Angeles	CA	90037	US	10/18/2021
Tim Manaka	Porter Ranch	CA	91326	US	10/18/2021
Kathleen Oda-Lew	Irvine	CA	92602	US	10/18/2021
Etzar Cisneros	Birmingham	AL	35206	US	10/18/2021
Russell Hirano	Torrance	CA	90503	US	10/18/2021
C Masuoka	Redondo Beach	CA	90277	US	10/19/2021
Richard Takagaki	Los Angeles	CA	90066	US	10/19/2021
Alex Van Wingerden	Santa Barbara	CA	93103	US	10/19/2021
Elizabeth Hernandez	Los Angeles	CA	90068	US	10/19/2021
Andrew Kan	Los Angeles	CA	90045	US	10/19/2021
Ronnica Weaver	Los Angeles	CA	90019	US	10/19/2021
Case Van Wingerden	Carpinteria	CA	93013	US	10/20/2021
Hank Kan	Arcadia	CA	91006	US	10/20/2021
Yuri Ogawa	Los Angeles	CA	90035	US	10/20/2021
Jeremy Kan	Los Angeles	CA	90064	US	10/20/2021
Tricia Shiota	Rosemead	CA	91770	US	10/20/2021
Eugene Fong	Los Angeles	CA	90064	US	10/20/2021
Diane Hara	Seal Beach	CA	90740	US	10/20/2021
Valerie Kan	Los Angeles	CA	90027	US	10/20/2021
Samantha Mek	North Hollywood	CA	91601	US	10/20/2021
Mel Kan	Arcadia	CA	91007	US	10/20/2021
Margaret Cheng	Fontana	CA	92336	US	10/20/2021
Johnson MaryGrace	Hacienda Heights	CA	91745	US	10/20/2021
Julia Murakami	Whittier	CA	90601	US	10/21/2021
James Kurata	Fontana	CA	92336	US	10/22/2021
Janis Tanji Wong	Pasadena	CA	91104	US	10/22/2021
Benida Sbicca	San Marino	CA	91108	US	10/22/2021
Mary Tamaki	Los Angeles	CA	90045	US	10/22/2021
Cisneros Jr Mariano	Kent	WA	98030	US	10/22/2021
Vedant Koppera	Los Angeles	CA	90503	US	10/22/2021
Stephen Kan	Newport Beach	CA	92660	US	10/25/2021

PRESERVE OUR JOBS!!

If you do not approve the Flower Market project, they will consider a land sale to the highest bidder. If such is the case, our jobs will be lost forever. **BY APPROVING THIS PROJECT**, it will not only retain our jobs, but create hundreds of **NEW JOBS** based on the project's description and scope.

j	HELP US KEEP OUR JOBS BY APPROVING	THE PROJECT!	
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APPROVE THE PROJECT AND KEEP THE FLOWER MARKET IN DTLA!

Dear Los Angeles City Council,

We urge you to approve the Flower Market project and keep it in DTLA. We use the market almost daily and it is imperative to our business that the flower market remain in a central location. If it were to move (i.e., to Orange County), this would be devastating to us since any place else would be too far to travel.

Please add me to the list of supporters and count of the Flower Market in DTLA.	n my support with future efforts that will keep
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Sonny Alexander Flowers	States Valley
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Hanadai Flourer	
Business Name	Signature
1-800-SUNFWILST.COM	Michael Statchiner
Business Name	Signature
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Morning Ordus	Wounday)
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Toral 1 mx	Alexan
Business Name	Signature
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Business Name	Signature
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Heaven's Market	Lady Car
Business Name	Signature
Samines Earden	Muni
Business Name	Signature
The Designer	Sheri Hurts
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Business Name	Signature

ENV-2016-3991-EIR

October, 2021

Los Angeles City Council 200 N. Spring Ave. Los Angeles, CA 90012

As members of the local Asian American community, we submit this petition and urge the City Council to approve the Flower Market project. In the 1940's, the Japanese families who owned the market nearly lost the property when they were imprisoned in internment camps. They are at risk of losing the property again as they can no longer afford to maintain the upkeep of their old buildings.

PLEASE DO NOT hold the Asian American owners of the Flower Market to a

higher standard than applied to other projects. Approve this project today and help the flower market continue on with its storied legacy!

| CISTORE CRITICAL CRITIC

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Travis Owens	(m/)
Printed Name	Signature
Brock BOOKWALTER	RR
Printed Name	Signature
Michael Connelly	Jel Com
Printed Name	Signature
Darren Rowe	Marie
Printed Name	Signature
Miguel Dian	2400
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Hyung Will Y- Printed Name	Deny
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David Crystal:	Jank Can
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Andrew Roldan	anden Male
Printed Name	Signature
Janice Wong	Sall and
Printed Name	Signature
Lauren Wong	
Printed Name	Signature
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Comment Letter No. 11

Support and Keep the So Cal Flower Market in DTLA!



Southern California Flower Market started this petition to City of Los Angeles Planning Department

The Southern California Flower Market has been a mainstay of the Fashion and Flower District of Los Angeles for 100 years. In 2016, the Market faced a life changing decision- move out of the City to address rising costs or look to the future and redevelop the property to ensure our health and longevity. We chose to stay and build upon our legacy and future.

Two years ago our families, which make up the ownership of the Market, were granted permission by the LA City Council to redevelop the property while maintaining our wholesale flower operations. This unique process helps us modernize, expand, and keep the hundreds of jobs that surround our operations on a daily basis. This approval for the addition of 323 new and much needed housing units 64,363 square feet of office, 13,420 square feet of neighborhood service restaurant space, and approximately 25,000 square feet of multipurpose commercial space while maintaining Market operations in the City for another 100 years.

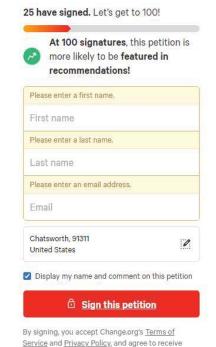
Our approval has been in jeopardy through a frivolous lawsuit and now it's our chance to share our voices publicly!

After years of litigation, the Judge has ruled we can move forward finally with minor technical tweaks to our Environmental Impact Report (EIR). Now, our previously approved project, returns to the City Council for two more hearings.

You have three opportunities to voice your support:

- 1- the EIR Comment Period (now-November 1st)
- 2- the Planning and Land Use Committee (Hearing anticipated mid-November)
- 3- the Full City Council (Hearing TBD)

Your signature helps at each Hearing and is vital to keeping the Market in Los Angeles for generations to enjoy!



occasional emails about campaigns on Change,org.

You can unsubscribe at any time.

Comment Letter No. 11 (Cont)

Name	City	State	Postal Code Country	Signed On
Scott Yamabe			US	10/5/21
Nancy Abreu	Los Angeles	CA	90015 US	10/15/21
Sophia Lisaius	Los Angeles	CA	90011 US	10/16/21
Kanel Suos	Los Angeles	CA	91206 US	10/16/21
Alison Nguyen	Los Angeles	CA	90023 US	10/16/21
Bryanda Rodriguez	Paramount	CA	92840 US	10/16/21
Adriana Herrera	Los Angeles	CA	90011 US	10/16/21
Louie Ortega	Reno	NV	89436 US	10/16/21
Ally Eandi	La Habra	CA	90632 US	10/16/21
Matan Birnbaum	Los Angeles	CA	90041 US	10/16/21
Christina Jimenez	Los Angeles	CA	90023 US	10/16/21
Krishni Satchi	Los Angeles	CA	90017 US	10/17/21
Jalisa Brown	Fresno	CA	93727 US	10/17/21
Lynn Pelkey	Los Angeles	CA	90014 US	10/17/21
Krystal Calderon	Fremont		68025 US	10/17/21
Jaya t	Racine		53402 US	10/17/21
Lisa Pozo	Los Angeles	CA	90039 US	10/18/21
Billy Rich	Burbank	CA	91505 US	10/18/21
Eric Gonzalez	Burbank	CA	91505 US	10/18/21
Josh James	Los Angeles	CA	90040 US	10/19/21
Fernanda James	Los Angeles	CA	90042 US	10/19/21
Jose Andrade	Los Angeles	CA	90040 US	10/19/21
Giles Clark	Los Angeles	CA	90021 US	10/21/21
Liz Navarro	Pasadena	CA	91101 US	10/22/21
Dan Carmen	Phoenix	AZ	85013 US	10/22/21

October 29, 2021

Advocates for the Environment

A non-profit public-interest law firm and environmental advocacy organization



Los Angeles Dept. of City Planning 221 N. Figueroa Street, #1350 Los Angeles, CA 90012

Via U.S. Mail and email to Erin.Strelich@lacity.org

Re: Comments on PR-DEIR for ENV-2016-3991-EIR

Dear Dept. of City Planning:

On June 4, 2021, the Court, in AIDS Healthcare Foundation v. City of Los Angeles, Los Angeles Superior Court Case # 19STCP05445, entered judgment in favor of Petitioner AHF in a CEQA lawsuit challenging the Environmental Impact Report (EIR) for the Flower Market Project (Project). The Project is a mixed-use project to develop 323 residential units and 167,248 square feet of commercial space on a site near Skid Row in Los Angeles.

The Court's judgment ordered the City to set aside its approvals of the Project, based on the Court's finding defects in the EIR's GHG and Noise sections. Respondent Southern California Flower Growers, Inc. has appealed the judgment.

On September 16, 2021, the City issued a Notice of Completion and Availability of a Partially Recirculated Draft Environmental Impact Report (**PR-DEIR**) for the Project. The PR-DEIR contains revisions to the EIR chapters on GHG Emissions and Noise. The purpose is to fix the defects the Court found in the original EIR.

The purpose of this letter is to comment on the PR-DEIR on behalf of our client, AIDS Healthcare Foundation.

Failure to Comply with Writ

The Writ of Mandate in the Case ordered the City to: "Decertify the environmental impact report for the Project, including the Draft EIR, No. ENV-2016-3991-EIR (SCH No. 2017051068), dated September 20, 2018, and the Final EIR, dated April 12, 2019, and set aside your approval of the Mitigation Monitoring Program and Mitigation Measures for the Flower Market Mixed Use Project."

In recirculating just the GHG and Noise chapters, the City is ignoring the Court's order to decertify the entire EIR. If the entire EIR was decertified, the City should be recirculating the whole EIR for comments and re-approval.

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29, 2021 Page 2

Improper Use of Appendix G as Threshold of Significance

The PR-DEIR states, at page 4.F-33, that the "City has adopted the thresholds set forth in Appendix G of the CEQA Guidelines as its project specific thresholds of significance." The City Planning Department, in early 2019, decided, without City Council approval, to adopt Guidelines Appendix G as the City's CEQA thresholds. This decision violated the law. CEQA Guidelines § 15064.7 sets forth the requirements for a City's adoption of thresholds of significance "that the agency uses in the determination of the significance of environmental effects." Such thresholds must be adopted by ordinance, resolution, rule or regulation. No such formal adoption occurred in this case. Since the City did not follow the requirements of Guidelines § 15064.7 in adopting Appendix G as the City's CEQA thresholds, the previous thresholds—those adopted in 2006—remain in effect. There are no thresholds for GHG emissions in the 2006 City of Los Angeles CEQA thresholds.

No Substantial Evidence Supporting Choice of Significance Thresholds

Given that Appendix G has not actually been adopted as a standard threshold by the City, the City needs to support its adoption of the Appendix G standards in this case with substantial evidence, which they haven't done. The PR-DEIR contains no substantial evidence justifying its choice of GHG thresholds, a CEQA violation.

GHG Analysis Time Frame is Too Short

The PR-EIR's GHG Chapter spends a lot of space analyzing the Project's consistency with AB 32, a GHG-control measure whose time has come and gone. It mandates reductions of the state's GHG emissions levels to 1990 levels by 2020. The goal has been achieved. It would be difficult for the Project to be inconsistent.

Most other analysis in the GHG Chapter looks only ten years into the future. But buildings like the ones proposed for the Project, tend to last at least fifty years. The Project's GHG analysis should extend at least thirty years from Project approval, i.e. to 2050.

Project Suffers from the Same Defect as the Newhall Project

The primary defect the California Supreme Court found in Newhall's EIR was that the EIR showed the Newhall project's mitigation measures would reduce the project's emissions 31% below a NAT scenario, and AB32's goal was a 29% reduction, so the EIR concluded the project's emissions were below the AB32 threshold and thus not significant. (62 Cal.4th 204, 225.) The Court held that the EIR failed to show that a project-level reduction of 31% corresponds to a state-level reduction of 29% or greater.

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October 29, 2021 Page 3

Here the EIR claims a 64% reduction from the NAT scenario, compared to SB32's target of reducing statewide GHG emissions by 40%. But there is, just as there was for Newhall, no attempt to show that a 64% reduction is an appropriate component for this project of the state-level 40% reduction. There are many reasons that housing projects like this one might be expected to reduce their GHG emissions by more than the average. There may be other sectors that can't reduce this much, so housing might need to reduce more. And, as the Newhall Court pointed out, retrofitting older construction to reduce its GHG emissions is much more costly than obtaining the same amount of GHG reduction in new construction, so new construction must reduce more than average to do its part.

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The Project is Not Consistent with the 2017 Scoping Plan

The EIR uses consistency with several plans as the significance threshold. In order for the Project's GHG impacts to be insignificant, the Project must comply with Executive Order B-30-15, SB 32, and CARB's 2017 Scoping plan, among others. But it's not consistent in several ways, including the following:

The CARB 2017 Scoping Plan contains a target of reducing the state's GHG emissions 80% below 1990 levels by 2050. The PR-DEIR contains no mention of this fact, and no discussion of how the Project would meet this standard

The CARB 2017 Scoping Plan contains a statewide annual GHG emissions target of 6 MTCO2e/capita in 2030, and 2 MTCO2e/capita in 2050. The Project is nowhere near meeting these targets. The project will have 323 dwelling units. If they are occupied by an average of 2.99 persons/dwelling unit, 1966 persons will occupy the Project. Even using the EIR's lowest estimate of the Project's GHG emissions, and ignoring emissions from the commercial space, the project will have 6,512 MTCO2e/year ÷ 966 persons = 6.74 MTCO2e/capita/year. In order to be consistent with the 2017 CARB Scoping Plan, the Project would need to have per-capita emissions well below the scoping plan targets, because the plan's targets include all sectors. The per-capita target must include each person's shares of emissions from transportation, electricity generation, and cement manufacture, for example, reducing the portion of each per-capita share that can be allocated towards their housing. The Project's per-capita share greatly exceeds both the 2030 and 2050 target, making the Project inconsistent with the 2017 Scoping Plan.

¹ The U.S. Census bureau estimates that the average household in Los Angeles County between 2015 and 2019 contained 2.99 persons. https://www.census.gov/quickfacts/losangelescountycalifornia

October 29, 2021 Page 4

The Project is Inconsistent with Executive Order B-55-18

The PR-DEIR correctly states that Executive Order B-55-18 requires the state to achieve carbon neutrality by 2045. But it doesn't include that order on the list of plans, policies, and regulations the Project must be consistent with in order for its GHG emissions not to be significant. This is an important emission. The adopted threshold is whether the Project would conflict with an applicable plan, policy or regulation adopted for the purposes of reducing the emissions of greenhouse gases. EO B-55-18 is such a policy.

The PR-DEIR violates CEQA by failing to analyze the Project's consistency with EO B-55.18. Ahe Project is not consistent with it because it requires the state to achieve carbon neutrality by 2045. The Project can never achieve carbon neutrality because it would burn natural gas.

The Project is Inconsistent with the L.A. Green New Deal Sustainability Plan 2019

The PR-DEIR claims the project is consistent with the City of Los Angeles Green New Deal Sustainability Plan 2019.² That plan sets a goal of reducing building energy use per square foot for all building types 22% by 2025; 34% by 2035; and 44% by 2050 from a baseline of 68 mBTU/sqft in 2015. In other words, its goal is for buildings to use no more than 53 mBTU/sqft/year in 2025, 45 mBTU/sqft/year in 2035, and 38 mBTU/sqft/year in 2050.

Project will have 656,350 square feet (DEIR p. 2-2), and use 1,780,734 cubic feet of natural gas per month (Appendix I-1 p. 9). A cubic foot of natural gas produces 1.037 mBTU of energy,³ so the Project will consume 22,159,454 mBTU/year of energy in the form of natural gas. The Project's estimated electricity demand is 4,257,332 kw-h/year (DEIR 4.N.4-12.) which amounts to 14,526,620 mBTU per year.⁴ Adding these up and dividing by the square footage shows the Project's energy intensity is 55.9 mBTU/sqft/year. This figure will stay the same during the Project's lifetime. The Project will not achieve the 53 mBTU/sqft target for 2025, let alone the later targets. The Project is therefore inconsistent with the L.A. Green New Deal, so its GHG impacts are significant.

Because the Project is inconsistent with the 2017 Scoping Plan, Executive Order B-55-18, and the L.A. Green New Deal, its emissions are significant and all feasible mitigation of the Project's GHG impacts is required. The City would violate CEQA if it certified the PR-EIR without fixing the defects discussed above.

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² Available at https://plan.lamayor.org/sites/default/files/pLAn_2019_final.pdf

³ U.S. Energy Information Administration, FAQs, https://www.eia.gov/tools/faqs/faq.php?id=45&t=8

⁴ https://www.rapidtables.com/convert/energy/kWh_to_BTU.html

Comment Letter No. 12 (Cont)

AHF Comments on Flower Market PR-DEIR

October 29, 2021 Page 5

Sincerely,

Dean Wallraff, Executive Director Advocates for the Environment

CERTIFIED FLORIST SUPPLIES INC

307 CULVER BLVD PLAYA DEL REY, CA 90293 310-821-0984

October 8, 2021 City Council – PLUM John Ferraro Council Chamber, Room 340 City Hall Los Angeles, California 90012

Dear Honorable Councilmembers of the Planning and Land Use Committee,

My name is Lance Williams and I represent Certified Florist Supplies Inc, a business directly across the street from the Flower Market on Wall Street. I am again writing to you to support the SoCal Flower Market and the minor tweaks to Case File #ENV-2016-3991-EIR in response to the judge's requests for greater clarity.

I am astounded that we are revisiting this after the project was overwhelmingly supported and approved two years ago. This project will enhance and improve our neighborhood which, over the last decade, has deteriorated resulting in a steady erosion of business and sales. I constantly hear comments from our patrons relating to the safety, or lack thereof, of our Flower District. Many of our long-standing customers have stopped shopping in our district because they have been harassed or threatened.

This is a game changing project that raises all businesses and stakeholders in the area. It was approved two years ago but then forced to revisit Council Hearings once again. This is why our neighborhood has lost all its hope and motivation since it is impossible to invest and improve when the uphill battle is never ending.

We are hopeful that this project will re-energize the area and activate a neighborhood in desperate need of improvement. The alternative if this previously approved project is modified in any way – loss of this storied Flower Market and the vision this project brings to our neighborhood. If the Flower Market is forced to leave the area, it will create a void which will result in the slow death of a district over 100 years old.

We cannot afford to lose one of the crown jewels of Los Angeles, not to mention one of the oldest businesses in California. It would be irresponsible of the City if it lost this major economic engine and its uplifting vision. Allow this previously approved project to build and build now!

Thank you for your attention.

Lance Williams

Sincerely,