



# COASTAL SAN PEDRO NEIGHBORHOOD COUNCIL

**Doug Epperhart**  
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April 27, 2021

To:

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planning.mello@lacity.org  
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councilmember.buscaino@lacity.org

Re: **City Mello Act ordinance must not allow demolitions/conversion of 100% residential structures for purposes of mixed-use projects.**

The following resolution was passed at the April 2021 Coastal San Pedro Neighborhood Council Board meeting:

***Whereas*, the Mello Act law was enacted by the State Legislature in 1982 in order to set forth requirements concerning the demolition, conversion and construction of housing within California's Coastal Zone.**

***Whereas*, the Mello Act requires each Coastal Zone area to enforce three basic rules, including that existing residential structures shall be maintained as residential uses unless the local jurisdiction finds that residential uses are no longer feasible; the Act specifically states: "The conversion or demolition of any residential structure for purposes of a nonresidential use which is not 'coastal dependent...' shall not be authorized..."**

***Whereas*, a mixed-use building is a non-residential use and that is clear throughout the Los Angeles Municipal Code (LAMC) and all coastal regulations.**

***Whereas*, the City intends to exceed its jurisdiction by changing both the letter and the intent of the Mello Act law in order to allow conversion or demolition of 100% residential structures for the purpose of commercial mixed uses if the same number of units are maintained.**

***Whereas*, there are 29 100% residential structures in Neighborhood Commercial zones in the San Pedro Coastal Zone, which contain 231 units, 164 of them protected by the City's Rent Stabilization Ordinance. See attached listing.**

***Whereas*, changing 100% residential structures to mixed use projects would change the character of those buildings and the surrounding neighborhood to commercial in nature.**

**Whereas, there is a housing shortage and not a mixed use or commercial use shortage.**

**Resolved, the Coastal San Pedro Neighborhood Council insists the City Planning Department and the City Planning Commission assure the proposed Mello Act Ordinance does not allow conversions or demolitions of 100% residential structures in the Los Angeles Coastal Zones, whether commercial or residential zoning, for purposes of mixed-use projects.**

Please contact Robin Rudisill, Chair of the CSPNC Planning Committee, at 310-721-2343 should you have any questions related to this letter.

Sincerely,

A handwritten signature in black ink that reads "Douglas Epperhart". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Doug Epperhart, President  
On behalf of the Coastal San Pedro Neighborhood Council Board

ATTACHMENT INCLUDED

cc:

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CPC February 25, 2021, Agenda Item 9. draft Mello Act Ordinance  
 Noel Gould, Coastal San Pedro Neighborhood Council  
 100% Residential Structures in Commercial Zones in the San Pedro Coastal Zone

ADDRESS	USE CODE	GPLU	CPIO -SUB AREA	RSO: #UNITS
3413 S PACIFIC AVE	0100 RESIDENTIAL SINGLE FAMILY	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	1
3407 PACIFIC AVE	0100 RESIDENTIAL SINGLE FAMILY	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	1
3337 PACIFIC AVE	0100 RESIDENTIAL SINGLE FAMILY	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	1
3333 PACIFIC AVE	0100 RESIDENTIAL SINGLE FAMILY	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	1
3329 PACIFIC AVE	0100 RESIDENTIAL SINGLE FAMILY	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	1
2733 PACIFIC AVE	0100 RESIDENTIAL SINGLE FAMILY	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	1
2729 PACIFIC AVE	0100 RESIDENTIAL SINGLE FAMILY	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	1
2316 PACIFIC AVE	0400 RESIDENTIAL 4 UNITS ANY COMBO 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	RSO 4
2300 PACIFIC AVE AND NORTH AND SOUTH ADJECENT PROPERTY	7500 INSTUTIONAL HOMES FOR AGED AND OTHERS	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	RSO 32
2226 1-3 PACIFIC AVE	0300 RESIDENTIAL 3 UNITS 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	RSO 3
2220 PACIFIC AVE	0400 RESIDENTIAL 4 UNITS ANY COMBO 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	RSO 4
2110 PACIFIC AVE	0500 RESIDENTIAL 5 OR MORE UNITS OR APARTMENTS 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	RSO 15
497 W 21ST STREET	0500 RESIDENTIAL 5 OR MORE UNITS OR APARTMENTS 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	RSO 15
2040 PACIFIC AVE	0500 RESIDENTIAL 5 OR MORE UNITS OR APARTMENTS 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	RSO 21
1704 PACIFIC AVE	0500 RESIDENTIAL 5 OR MORE UNITS OR APARTMENTS 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	15
485 W 17TH STREET	0500 RESIDENTIAL 5 OR MORE UNITS OR APARTMENTS 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	COASTAL COMMERCIAL B	15
302 W 16TH STREET	0100 RESIDENTIAL SINGLE FAMILY	NEIGHBORHOOD COMMERCIAL	NONE	1
312 W 16TH STREET	0100 RESIDENTIAL SINGLE FAMILY	NEIGHBORHOOD COMMERCIAL	NONE	1

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316 W 16TH STREET	0100 RESIDENTIAL SINGLE FAMILY	NEIGHBORHOOD COMMERCIAL	NONE		1
1529 CENTRE STREET	0300 RESIDENTIAL 3 UNITS 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	NONE	RSO	2
1523 CENTRE STREET	0100 RESIDENTIAL SINGLE FAMILY	NEIGHBORHOOD COMMERCIAL	NONE		1
287 W 15TH STREET	0200 RESIDENTIAL DOUBLE DUPLEX OR 2 UNIT 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	NONE	RSO	1
1312 PACIFIC AVE	0500 RESIDENTIAL 5 OR MORE UNITS OR APARTMENTS 4 STORIES OR LESS	COMMUNITY COMMERCIAL	COASTAL COMMERCIAL A	RSO	24
1226 PACIFIC AVE	0500 RESIDENTIAL 5 OR MORE UNITS OR APARTMENTS 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	CENTRAL COMMERCIAL B		30
124 W 11TH STREET	0500 RESIDENTIAL 5 OR MORE UNITS OR APARTMENTS 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	MILTI FAMILY RESIDENTIAL	RSO	15
1012 S PALOS VERDES STREET	0500 RESIDENTIAL 5 OR MORE UNITS OR APARTMENTS 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	NONE	RSO	12
125 W 10TH STREET	0500 RESIDENTIAL 5 OR MORE UNITS OR APARTMENTS 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	NONE	RSO	16
134 W 10TH STREET	0200 RESIDENTIAL DOUBLE DUPLEX OR 2 UNIT 4 STORIES OR LESS	NEIGHBORHOOD COMMERCIAL	NONE	RSO	1
939-915 S BEACON STREET	7500 INSTUTIONAL HOMES FOR AGED AND OTHERS	NEIGHBORHOOD COMMERCIAL	NONE	RSO	0

231 UNITS TOTAL

164 RSO UNITS

The draft Mello Act Ordinance proposes to allow for conversions of residential structures to mixed use. Please do not allow the conversion of these 29 residential properties in San Pedro's Coastal Zone to mixed use. Not only is this not allowed by the Mello Act, but a change to mixed use would not conform with the Coastal Act, which requires the existing mix of uses to be maintained. It would lead to intensified commercial development in the area and chip away at the existing housing, which would change the character of the neighborhood.