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Public Comments Not Uploaded Fw: CF 23-0497, 1848 S. Gramercy Place (PLUM agenda item No. 8 for Tuesday, Aug. 15)

1 message

'Laura Meyers' via Clerk-PLUM-Committee <clerk.plumcommittee@lacity.org>

Sun, Aug 13, 2023 at 4:08 PM

Reply-To: clerk.plumcommittee@lacity.org

To: "clerk.cps@lacity.org" <clerk.cps@lacity.org>, Clerk-PLUM-Committee <clerk.plumcommittee@lacity.org>, Candy Rosales <candy.rosales@lacity.org>

Cc: Preservation <preservation@westadamsheritage.org>

To the City Clerk:

I am one of the Appellants in this case, Council File No. 23-0497, [1848 S. Gramercy Place, Los Angeles CA 90019](#) (to be heard at PLUM on Tuesday, Aug. 15, Agenda Item No. 8).

The Council Comment portal is not working this weekend (for me at least) and freezes each time I try to submit the comment below and the attachment(s). I ask that you please consider this a properly-submitted Public Comment and attachment, and that you can upload the comment and documents on my behalf. I appreciate your help.

>> The first PDF document is a compilation of the multiple public comment letters that had been submitted to the City Planning Commission but **NOT FORWARDED** by the Planning Department. While the public is always assured that their testimony is permanently a part of the case file and public record, it seems that the usual practice is to EXCLUDE this written material (and also the oral testimony) from the material made available to the City Council. So with this submission I am supplementing the case file with the previous written testimony.

In the compilation of the written public comments, I would first like to draw your attention to Mitchell Tsai's letter (begins on page 1 of the attached PDF). Mr. Tsai is an attorney NOT representing me or any of the Appellants. He notes that the project does not even qualify for a density bonus or incentives since it will displace numerous low-income residents without true equivalent replacement housing or relocation.

Regarding **CEQA issues**, Mr. Tsai informed the Planning Commission that, "*Class 32 Does Not Apply In View of Applicable Exceptions. Guidelines § 15300.2(b), (c) and (f) exclude categorical exemptions, including Class 32, if a project may have cumulative impacts, significant impacts due to unusual circumstances, and impacts to historical resources. All three apply here. First, the site is immediately across from another 64-unit project at 1275 W. Washington Blvd., but is not mentioned by the City for cumulative impacts. Also, City's cumulative analysis is improperly limited to 500 feet radius. Second, due to the Project's unusual mass/scale and design features, location in methane zone, commercial corner, within RDP, the Project may have adverse impacts. Third, the Project site itself contains a building of historical significance, proposed to be demolished. The fact it was not registered as a Historical Monument is not dispositive.*"

The second (long) letter is from me, Laura Meyers, and includes relevant excerpts from the Redevelopment Plan.

The third and fourth letters are from West Adams Heritage Association (WAHA) and include excerpts from the City Planning Department's own previous Historic Resources Study for South Los Angeles that identifies 1848 S. Gramercy Place as a Contributor to a local historic district in the Angelus Vista Neighborhood. That

Study makes clear that [1848 S. Gramercy Place](#) is a historic resource under CEQA, and needs to be treated as such.

Additionally there are 11 other comment letters (including one in favor of the project -- this is a complete compilation of the public comments).

>> The second stand-alone PDF document is a **transcript of the audio tape of the oral testimony and Commissioners' discussion** at the final City Planning Commission hearing.

Thank you very much.

Laura Meyers

2 attachments

CF 23-0497__1848 Gramercy_CPC-2020-2115-DB__CPC Meeting Audio Transcription.pdf
150K



CF 23-0497__1848 S Gramercy - CPC public Comments.pdf
4755K

06_CPC_2020_2115_DB

Thu, Mar 02, 2023 4:03PM 1:21:05

SUMMARY KEYWORDS

project, applicant, building, units, neighborhood, proceed, commissioners, housing, affordable housing, waiver, house, proposed, question, zoning, site, incentives, record, developer, law, cpc

SPEAKERS

Giselle Santos, Maria Cabildo, Akhilesh Jha, Commissioner Millman, Natalie Neith, Caroline Choe, Sergio Borough, Amy Brothers, Laura Meyers, Dana M. Perlman, Cecilia Lamas, Michelle Sing, Brian Jett, Dimitrios Pohl, John Arnold, Grace, Helen Leung, HAKEEM PARKE-DAVIS (CD-10), Lisa Weber, Jim Childs, Alex Jaspersen, Sean O'Brien, Rafael Fontas

- C** Commissioner Millman 00:00
Item number six is case number CPC 2022 115 DB related environmental is EMV 2022 116 C II The project is located at 1848 South grammar seat place within council district 10. Before we proceed with this item, I just want to confirm commissioners can be zoned dimora have listened on the record to our previous audios for the meetings of March 24. June 23, October 27 and December eighth 2022. Yes. This is a way to get some more on Yeah. Thank you so much, commissioners. Celia, do we have any day of submissions?
- C** Cecilia Lamas 00:45
Proceed LMS. For the record, we do have dibs submissions for item number six commissioners and stuff. I'd like to direct you all to the Google share drive for members of the public compliance if submissions can be viewed in the shared drive by clicking on the link located at the top of the first page of the agenda. Thank you.
- C** Commissioner Millman 01:00
Thank you. At this time, we are going to hear from planning staff please go ahead when you're ready.
- R** Rafael Fontas 01:10
Morning, commissioners is the presentation visible?

C

Commissioner Millman 01:15

It is Thank you. Great, thank

R

Rafael Fontas 01:16

you. My name is Rafael Fontas. From the planning department, presenting a density bonus case for a site at 1848 South grand mercy place on October 27 2020. To this commission at the request of the applicant continued the item as the applicant wish to modify the project scope. The applicant waive the December 8 scheduled CPC hearing that's counting towards the five hearing limit for the housing crisis act, and on November 28th 2022, granted an extension of time to act on the project to today's date of February 23 2023. By two the project remains a mixed use development containing 33 apartment units, three of which will be affordable to very low income households. Buy three the building. Previously seven storeys with a height of 73 feet four inches will now be eight storeys and 89 feet in height. The maximum SAR previously 5.1 to one will now be 6.1 to one with 20 parking spaces at grade and on the second level. The rendering on this slide depicts the proposed project as it would look from the north of the site. street trees to the north of the site have been visually omitted to show the building's northern elevation, but are not proposed to be removed or altered. Like for the site is located near the northeast corner of West Washington Boulevard and South Gramercy place just west of Western Avenue. The site lives within a quarter mile a bus stop service by two metro lines and the LA D O T dash Midtown line by five the site is designated for neighborhood commercial land uses zoned C 1.5 dash one VL dash cpio and lies within the South Los Angeles Community Plan area and Community Plan Implementation overlay. By six site is currently developed with a two storey residential structure proposed to be demolished. But seven surrounding properties are improved with a mix of uses, including multifamily residential and commercial storefront uses with buildings up to three storeys in height. A four story TOC project has recently been completed across the street from the subject site. By Date, the architectural site plan demonstrates how the proposed building fills out most of the lot fronting Gramercy place to the west. The building footprint has not changed from previous design by design. As with earlier designs, there are two pedestrian entrances from the eastern side of grammer see, the entrance of budding the primary frontage is for retail space, and is demarcated by overhead entrance canopies. The residential entry indicated here by a blue arrow is set back from the street to accommodate a below grade transformer pad. And at great parking spaces, including one commercial parking space will be accessed from a driveway in the northern half of the lot frontage. Portions of this level will also be devoted to bike storage or residential lobby, elevator shaft garbage and recycling rooms. Like 10 The second floor will provide an additional 10 parking spaces. This will likewise be accessed from a vehicle entry ramp along the building's northern facade At this level, the frontage along Rameses primarily devoted to a 600 square foot gym, with the remainder given over to a 110 square foot retail mezzanine. The rest of this floor is given over to storage, longterm bicycle parking and egress staircases. Slide 11 project initially had 21 One bedroom units 10 two bedroom units, and two three bedroom units on the third through seven levels. The updated design now has 21 bedroom units 12 two bedroom units, and one three bedroom unit on the third through eighth levels. Additional interior space from the added square footage is now devoted to one children's play room, one co working space, one business center, one clubhouse, and three recreation rooms. These amenities are distributed throughout the third to eighth levels by 12. As with earlier designs, units on all residential floors share egress onto a single loaded corridor, which is open to the exterior and inset into the building southern facade units on each floor button Gramercy place will have a private patio facing west and remaining units will have private patios facing north by 13. As

with earlier designs, the south and east elevations are clad with stucco walls at the first and second levels on the south elevation. Balcony like openings along the single loaded residential corridor provide the most significant variation, along with an elevator shaft clad with a vertically oriented corrugated metal. Articulation is restrained at the first and second levels of the North elevation, with the largest change resulting from ventilation openings at the first and second levels. These openings have been reduced to align with and match the size of picture windows on the upper floors, and are visually obscured by series of offset vertical louvers. This is contrasted from the third to eighth floors, provided by alternative rows of picture windows and private balconies inset into the building mass. The West Elevation fronting grammars the place is the most varied in terms of material color and massing. The street level frontage is entirely devoted to vehicular, commercial and residential lobby entries, while the second level is distinguished by three groupings of picture windows that respond to these entries. Race a picture windows balconies, and the elevator shaft provide variation for the floors above. Vinyl Siding with a wood face pattern breaks up the verticality of the buildings northwest corner and visually aligns with vertical massing on the building's Northern and Southern elevations. This cladding strategy is relatively unchanged from earlier iterations, save for the added height resulting from an additional residential floor. By 14 the applicant has requested a 35% density bonus, the SAR incentive has been increased again from 5.1 to one to 6.1 to one, the request for increased storeys in height is now a waiver of development standard in its place, the applicant has requested and off menu incentive to waive the requirements of the low impact development ordinance. Additional request consists of the following waivers of development standards, the aforementioned waiver for heightened stories to permit an 89 foot eight storey height in lieu of 45 feet. A waiver to reduce the transitional height to a zero foot depth in lieu of a 25 foot depth for the South Los Angeles cpio. waiver to permit a zero foot landscape buffer in lieu of the required five feet between this site and the more restrictive zone abutting it to the north. A waiver to permit a 10 foot ground floor height and little required 14 feet part of the South LA cpio. By 15. waiver for side setbacks to permit zero foot side yard setbacks from the first to second floors, and five foot side yard setbacks for the third through eighth floors in lieu of the required 10 feet. A waiver for rear setbacks to permit a five foot rear yard setback for the first two second floors and a 10 foot rear yard setback for the third through eighth floors in lieu of the required 19 feet. An open space waiver to permit 2418 square feet of open space in lieu of the required 3675 square feet. A waiver to permit a three foot wide passageway in lieu of the required 20 feet. And finally, a waiver to permit a commercial frontage of 10 feet in lieu of the required 17.5 feet

C

Commissioner Millman 09:55

by 16.

R

Rafael Fontas 09:59

That concludes our The presentation staff is available to answer any questions. Thank you.

C

Commissioner Millman 10:04

Thank you so much. Commissioners. Do you have any technical questions at this time?

M Maria Cabildo 10:11

President Melman, I have some questions about the affordable housing units, and I'm not sure if that's considered a technical question are not certain about the distribution of the affordable units and the process for lease up for those

C Commissioner Millman 10:27

can stop answer that now. Sir J varsity

H HAKEEM PARKE-DAVIS (CD-10) 10:34

bunny, can you repeat your question?

M Maria Cabildo 10:36

Sure. So one question is, we have one twos and three bedroom units. And I want to know, is a three bedroom one affordable unit, and then one, two and one one? Because that's what I would expect. And the second question is, I want to know how these units will be leased up. To make sure that there aren't any fair housing violations and Elisa these properties. These units

S Sergio Borough 11:06

Sergio borough city planning in regards to your first question, there is a three bedroom unit and presumably that would be required to replace the existing unit that is four bedrooms. In regards to leasing requirements, that would be entirely Housing Department issue, and they would be enforcing the covenant related to the Affordable Housing for this project.

M Maria Cabildo 11:31

So can it be covenanted that the three bedroom is an affordable unit?

S Sergio Borough 11:37

It would have to be because it would be replacing the current unit.

M Maria Cabildo 11:42

Okay, so that's we are definitely looking at a three bedroom being an affordable Yes.

S Seraio Borouah 11:48

Sergio Berroghn 11:18
That is correct.

L Lisa Weber 11:49
Yes. And good morning, commissioners. Good morning, Commissioner Cabildo. This is Lisa Weber are with the City Planning Department. As Sergio indicated, the Los Angeles housing department administers the requirements for onsite covenanted affordable housing units. We know that those units are to be evenly distributed throughout the building so as to avoid all units being on the ground floor, for example. And so that is a requirement and something that LHD will check as they're going through the covenant process.

M Maria Cabildo 12:29
Okay. And in the recordings. My other question was, I know that these parking spaces, there are 20 parking spaces. And I just want to make sure that the low income units will have access to those as well, that they will be discriminated against because they're low income units, and not have access to a proportionate number of parking spaces.

C Commissioner Millman 12:57
That speak to that?

M Michelle Sing 12:59
Michelle saying city planning? Yes, I believe that is a requirement of you know, LHD,

M Michelle Sing 13:04
that the parking spaces are, you know, allocated to the low income units as well.

M Maria Cabildo 13:14
Thank you very much

C Commissioner Millman 13:16
Thank you great questions. At this point, we are going to let the applicant proceed with their their presentation. Welcome, please let us know how much time you'd like.

A Akhilesh Jha 13:30

Like about four minutes or so.

C

Commissioner Millman 13:34

Okay, let's put four on the clock. Please go ahead. When you're ready.

A

Akhilesh Jha 13:38

I'm ready. I don't have a presentation. I just wanted to share some of the thoughts I have with the Commission and the people involved in this project. First of all, I would like to thank the city staff for preparing the report they have done an excellent job they have done the analysis they have understood the project, they have understood my concern. Staff and I went through several several design iterations where they asked me hard question that why the parking like that? Why is the height like that? Why can't I have underground parking? And to me, I believe that I have answered those questions. Because that is what the project required to provide for 33 units, which are you could see that most of them are single one bedroom unit. That is what we ended up doing. We're going to also note that I bought this property in October of 2017. And I started the process with the city to build a housing here in about February of 2018. So after more than four years of struggling with this product, I'm still here I don't have any even the first series of approval. And as you maybe are aware that time is money when we talk about a business when we talk about investment, so I lost a lot of money pursuing this project. Some people say that okay, project is tall. That is why there is so much of opposition from the neighborhood. That is not the case. When I asked for a demolition permit for that house, I had almost the same number of opposition, thanks to the to the neighbor, who is so keenly interested in keeping that 120 year old house intact. And I had to go through the one year of sem process all the lawyers attorney City Council Plan Committee, a city report that then had to go to the TOC project where the city ultimately rejected my application, saying that I don't need some criteria of commercial weight or some parking. And I don't have any mechanism to ask the city to give me those instant demand or waivers because of our TOC program. So there they are, they kind of got me saying that I will give you more density, but at the end, I could not do it, then I had to revise my my project again. So it has gone through too many times. Even even this council has taken five hearing the limit of the five hearing that it could take it did. Everything has a consequence anything, somebody's bleeding money, we are in this project. For the last two, three years, with the eviction moratorium, I have been barely being paid. And then from the house houses calling the I have to come up with the repairs and maintenance 400, you are aware of how the house looks like it's an old house ready to fall any day. But then, since I have to keep it standing, somebody is footing the bill to maintain it. So my point is that, that in the last four years, the construction cost has risen by more than 50%. So to make the the project feasible, what else would I have done? I don't know, I understand that the single family homes in the neighborhood. But you have to also understand that this house is three miles from the downtown, it cannot be more central to Los Angeles. That is extremely central to Los Angeles. So so if the city is serious about the housing, if the mayor is serious about the housing, if the state is serious about the housing on homelessness, then we have to let go of our reservation that oh, it is going to set a brand. That is what the CPC has come and was last time that they are afraid of that business setup set a brand of a bigger building. But that is what you want. Anyway, we are behind the housing element, we are behind the housing quota. We are the worst in this nation, when it comes to the rental housing unit. These problems cannot be solved by just by paper, somebody has to build a house to solve the housing crisis. So so the problem that I see here is that the left hand doesn't know what the

right hand is doing. And that is why we are in this mess. You're squeezing me from one hand and other and you're asking me to make it shorter, make it smaller, make it it is not possible. So this is my best effort. And I let you decide in a more objective manner, not by going because that 30 people who will be speaking right now against it not because of that, because of the merit of what we are saying that the staff has analyzed every sentence of that housing and the plan, and they have gone to report that's a very strong report, I would urge you to read it carefully, and then do the right thing for the housing. Thank you. That's all.

C Commissioner Millman 19:13

Thank you so much. At this time, we are going to open the public testimony portion of this hearing. Each speaker who's participating by phone can press star nine. If you're participating by zoom, please click the raise hand button. For those on the phone we'll call out the last four digits of your phone number when it's your turn. Please state your name clearly and proceed with your comments. When you hear a message that states you are unmuted please press star six to unmute yourself. For those on Zoom we will call out your name when it is your turn. You'll see a prompt pop up that says the host would like you to unmute, please click on unmute at that time each speaker will have one minute to meet please go ahead and call our speakers

C Commissioner Millman 20:01

Grace, you are now able to unmute, please proceed.

G Grace 20:06

Thank you, commissioners, my name is Grace Yoo and I live a block away. I am actually happened to live next to a project where it was built four storeys high. And our community welcomed it. This is the permanent supportive housing for seniors and formerly homeless people. So my community supports housing that is appropriate. I would like for you to consider asking the staff what happened between

G Grace 20:39

this last juncture and the last hearing we had, I think it was October of 2022. The builder is the developer is wanting more units to be built, and is being really coy by putting in full bathrooms and these units that are labeled as like play room, community rooms, so it's easily convertible to apartments. So I think there's dishonesty once again from the developer, so please ask about this.

C Commissioner Millman 21:11

Thank you. Mimi, folks for the record. Gene, you are now able to unmute, please proceed.

M

Maria Cabildo 21:20

Good morning, commissioners. I know you have a difficult task. I'm here today representing West Adams Heritage Association. Our comments have been submitted in writing. We had hoped that there would be a better development at this meeting than at previous meetings. But this appears to go completely askance from what the commissioners I believe had hoped for at a previous meeting to allow for more time. So there would not be what seemed to be way excessive waivers. There are health and safety issues. The changes go in completely the opposite direction of I believe, the commissioners, the council office, the neighborhood council, and certainly West Adams heritage would like to see we're also dismayed that this 120 year old house and its occupants have not been correctly or factually analyzed in the report. Please deny this. It ought to be it ought to be denied because it is excessive and thank you. Thank you. Jill, please proceed. Good morning city commissioners. My name is Joe wells and my family and I live at 2243 West 28th Street on the corner of Gramsci and 20th. near Washington Boulevard and right across the street from proposed from the proposed housing I implore you not to improve the proposed project. No one has reached out to us on the regarding the impact on children and I will tell you we have lived here for almost seven years. And during this time, the sense of community and camaraderie I felt is unmatched. I've watched my daughter grow from a shy anxious six year old to a feisty entrepreneurial caring teenager, she has the opportunity to develop friendships, ride her bike with other children whose car washes start dog walking business, and ideally childhood that is all but gone for most urban areas in Los Angeles. These similar growth opportunities is what LA is all about. The addition of a high rise would impact children in the community and this will be detrimental to the livelihood of our families. Traffic noise speeding and other activities will make these outdoor activities unsafe. I urge you to vote against this. Thank you.

C

Commissioner Millman 23:33

Thank you. Brian Bryan,

C

Commissioner Millman 23:38

please proceed.

B

Brian Jett 23:41

Good morning. My name is Brian Jett, other than 1834 South Gramercy place and I'm just really trying to control my anger. I can't believe after four continuances where we implore the applicants to work with the community to try to put in something that was more suited for the area. He came back with something that was even worth it's it's mind boggling. He talks about the money he's lost and that he has no choice but to put in eight stores. Of course he has a choice. That's ridiculous. As already mentioned, there was a three storey project across the street. It was another two storey close by that's insane. He's also complaining already about having to maintain the house now, which is currently occupied by low low income residents living this lead. Well, if he's complaining about that, imagine what he's going to be like with his maintenance of this monstrosity. I urge you to please turn this African down. Thank you. Thank you. Shawn. Please proceed.

 Sean O'Brien 24:49

Yeah, hi, this is Sean O'Brien. I would cross Washington Boulevard in Western Heights and I know this area very well. I walk there on that street every day with my dogs. I'm just in shock to that. From the last meeting in October, there were no real changes made to the requests to the community or even nothing to me. It's gotten worse. The building is taller, it has no green space, and it's just an eyesore. And I take offense to on about the comments that the house he has now is 100 years old and falling apart. We all many of us live in this neighborhood because the houses are 100 years old. And they need you know, this is a historic district. And that's why we live here. We have a house that was built in 1970 1907 that we restored in love and it contributes to the neighborhood this building would not it would just be an eyesore. And I just take offense that no real change was made from the previous hearing in October and our concerns were not really listened to. Thank you. Thank you.

 Commissioner Millman 25:55

Color too to five to six, please press star six to unmute.

 Jim Childs 25:58

Good. Good morning, Jim Childs for Adams Dockweiler. Heritage. I made a comment about this project before. We are concerned about the demolition of the historic house which you are well aware of the fact that it's categorically exempt. You as the planning commissioners have to start responding to this insanity that you've imposed by negligence on our communities. I've spent 40 years in planning and have attended zoning meetings forever. And to have all our efforts ignored by state mandated laws is more than ridiculous. It's threatening to the very future of the city. You need to be planners, not lemmings. So thank in ask questions, especially of staff who have been deliberately under the thumb of the city attorney's office for way too long. This is a joke. When you send something out and it comes back gross. Thank you. Thank you. Caller

 Commissioner Millman 27:13

1735 please press star six to unmute. Caller 1735 please press star six to unmute. Please press star six.

 Commissioner Millman 27:35

Hello. Yes, we can hear you.

 27:38

Hi, my name is Su solvers.



27:40

I'm a parent of a student at better Academy.



27:44

I'm calling on behalf for the approval of the school to be built on this lot.



27:50

I hear a lot of comments. And honestly, I haven't heard nobody talking about the school. So I don't even know I'm in the right meeting or not.



Commissioner Millman 28:06

This is item number six when we get to item number seven will call for members of the public to give their input. And we look forward to hearing from you at that time. Thank you so much for joining us this morning.



Commissioner Millman 28:24

Alex, please proceed.



Alex Jaspersen 28:27

Hi, my name is Alex Jaspersen. I'm the president of the Western Heights Neighborhood Association. Western Heights is an HPLC neighborhood that is located just south of the proposed structure that runs along Washington just want to echo what a lot of the residents have already said. We've spent about the better part of a year trying to work with this developer as we've worked with other developers in the neighborhood in the past, and he's refused to even speak with us, which has obviously been very disheartening and disappointing, especially when we see proposed changes that make the building even bigger and more of an eyesore for the community. We also know that there are more individuals living in the house at the moment, then would be able to be placed into the new unit, even if it was a three bedroom again, which is very disheartening and very disappointing. So we hope that you'll deny this applicants.



Commissioner Millman 29:27

Thank you so much.



 Commissioner Millman 29:30

Laura, please proceed.

 Laura Meyers 29:33

Can you confirm that you can hear me please? Loud and clear. Thank you. That's fun with this computer on and off. My name is Laura Meyers. I live in 1818 South Gramercy place. I have written too many letters I suppose at this point. In my most recent letter, I really did point out that the current zoning on purpose is C 1.51. VO C Pio when the applicant purchased the property If it was zoned industrial, it had acute condition not allowing residency. So when he complains that he's been trying since 2017 to build apartments, yeah, but you bought something. He's bleeding money. He says that when we bought it, it had \$15,000 or more rental revenue per the MLS. He's the one who puts people out of the house. He also applied for PPP firms to forcefully through his grammar see manual LLC, which is on your plans and replaced that last thing so I could speak for five minutes but obviously you won't let me so thank you so much for considering my letter and the zoning changes should not be approved. The speaker should not be approved with a violation of

 Commissioner Millman 30:50

Thank you. So thank you so much and we have read all of your correspondence so we do know all of your concerns with the project thank you so much for joining us again. Andy please proceed

 Commissioner Millman 31:02

Kennedy Gomez, you are able to unmute.

 Commissioner Millman 31:23

You have another computer on in the background. You're in the room with someone else who's listening to this hearing. If you could have them turn the volume off on their will prevent drama

 Commissioner Millman 31:53

give her a moment. Again, let's make sure any other computers that are in the room with you, or any other phones on speakerphone are have their volume off while you speak because we're getting feedback and if you could unmute yourself Miss Gomez. We would love to hear from you at this time

 32:18

my name is Sandy Gomez and I'm about



32:30

I support valor Academy elementary school



Commissioner Millman 32:41

this is this for item number six or you testifying for the school that we will be considering an item seven Are you here to testify on the apartment building or the school?



Grace 33:04

Similar must for the record Commission President moment if you'd like we can proceed an attempt to go back to candy to confirm.



Commissioner Millman 33:10

Let's do that. I'd love that we have a student such as it I just want to make sure we she has heard correctly. Thank you. Thank you.



Commissioner Millman 33:19

Giselle, you are now able to unmute please proceed. Good morning,



Giselle Santos 33:25

my name is Giselle Santos, retired, I have lived in this neighborhood of 40 years, I have seen a lot of transition. And I love my neighborhood. I'm also very, very upset about this facility and the fact that this developer hasn't reached out. I'm just kind of curious, the house that he that the house is 125 years old that has current tenants in there are any of those tenants who appear to be low income going to be considered as possible new tenants in this wonderful building that he wants to build that we'll have three units to, to rent to low income people. I'm just also concerned to see what's going to happen to those people because in fact, if we are concerned about homeless and low income people, that means that those individuals should be able to have a chance because they're going to lose their homes. And that's just one of my concerns today. And of course I oppose this. But I understand we need housing.



Commissioner Millman 34:31

Thank you, and staff when we respond if you could speak to when we do staff responsive if you could speak to that question. Thank you.



...



Natalie Neith 34:43

Natalie, please proceed. Thank you. My name is Natalie knees and I also live in Western Heights. I will be able to see this building from my bedroom window. Looming high above all the historic part nobody's in the neighborhood. I'm a realtor. I've been a realtor in Los Angeles for 33 years. My concern about this is much the same as everybody else. I do not understand why he has carte blanche to ask for nine or 10 waivers. There's just disregarded and no one's mentioned the fact that he's providing plenty parking spaces for eight, an eight storey building with more than 30 units. That will obviously spill over until the neighboring neighborhoods he has not as has been previously mentioned, reached out to our neighborhood associations to talk to them about any kind of concessions. And it's also interesting that there are more there's almost more thin staff on this meeting than there are commissioners. I I just feel like you're being ignored. I'm being asked I suppose. violently opposed. Thank you. Caller 9169 please press star six to unmute. Caller 9169



Commissioner Millman 36:10

please press star six to unmute. We'll come back.



36:22

Color 3010 please press star six to unmute. Polar 3010 please press star six to unmute.



36:40

Okay, we'll come back.



36:45

Color for seven to eight. Please press star six to unmute.



Commissioner Millman 36:55

Please press star six to unmute.



37:02

We'll come back.



Commissioner Millman 37:06

Demetrius please proceed.



37:14

Demetrius poll,



37:15

are you there? You may now unmute. I can make



Dimitrios Pohl 37:23

it across. Yes, you are. Good. Thank you. I have lived in this neighborhood for 30 odd years. They have a neighbor who has will have a view of this proposed monstrosity. I am objecting to this proposed project for the second time in the strongest possible terms. This project is the same old wine and a new bottle and unfortunately, time has not improved, it has gone completely sour. My objections expressed in my letter of May 17 2020 to still stand. But now the applicant has added further insults to the neighborhood. By increasing the height of the project. The developer continues to game the city's planning process, and this new proposal is even worse than the original. This project is designed entirely to make a profit at the expense of the surrounding neighborhood. Whereas the open space that is required will be waved away. The city's already insufficient tree canopy will be reduced further. When the material street trees in front of the property are cut down and make way for the driveway. The Zone height limit of 45 feet is exceeded by an even greater margin than before. Taking the height of the building from 75 feet to 90.6 feet by adding an extra floor the applicant is crammed in at a time. Thank you. Thank you.



Commissioner Millman 38:48

Friendly reminder for members of the public dialing in please press star six to unmute polar 9169



Commissioner Millman 38:59

You may now speak



Commissioner Millman 39:05

call 9169 Yes, we can hear you. Hi I'm so sorry. I



Commissioner Millman 39:09

was calling for item number seven and dialed in accidentally



 Cecilia Lamas 39:13

too soon. Thank you

 Cecilia Lamas 39:21

caller for seven to eight. You may not speak caller for seven to eight. Please press star six

 Cecilia Lamas 39:33

if you'd like to speak or press star nine to lower your hand okay, okay, we'll come back and then the hand was lowered. Perfect. Thank you.

 Cecilia Lamas 39:48

Color 3010 Please proceed. Please press star six

 Cecilia Lamas 39:57

to unmute or star nine to lower your hand

 Commissioner Millman 40:05

Okay.

 Cecilia Lamas 40:07

Candy Gomez, you are now

 Cecilia Lamas 40:09

able to speak. Please unmute.

 Laura Meyers 40:17

This is an LMS for the record. Kenny Gomez, who's joining in and do you have the ability to unmute yourself?

 40:24

Is there number items coming?

 Commissioner Millman 40:27

Thank you so much. We'll come back to you that meaningful for the record. There are no more members of the public raising their hand. However, we do have one neighborhood council representatives. Excellent. Let's hear from our neighborhood council representative. Welcome. Let's put three minutes on the clock. And you can begin when you're ready. Can you hear me? Loud and clear?

 John Arnold 40:54

Good morning, commissioners. My name is John Arnold. I am a co chair for the planning and zoning committee for the neighborhood council for this area, which United Neighborhoods Neighborhood Council. I am here to reaffirm the resolutions, yes, that we submitted back in March. This will be the fourth time that I've been at this meeting, justifying an opposition on behalf of the neighbor council for this project for the reasons stated in our letter, as much of what has been said already. We are a first of all, I'd like to say that UNNC is not your typical NIMBY neighborhood counsel. We have actively supported hundreds if not 1000s, I think we might be up into the 1000s now of housing in our neighborhood along our Boulevard in our neighborhoods, including a lot of affordable housing. And we're proud of that. So we are opposed to this project for a number of reasons that have been stated they're all outlined in the letter, they generally focused around demolishing the current house which has affordable housing. The as you've seen, the aggressive number of waivers, which essentially puts zoning, zoning it as we know it and the CPA requirements aside and asked for just about anything. And as the noted, it's gotten worse since the last time we saw it. Toward design is also bad multiple building and safety issues that will come up and plan check. So we doubt that this project will ever be able to achieve substantial conformance, and also new building safety requirements. I know that's not your purview. But there are violations here because of the aggressive nature of how they're filling out the locks. So I'm here to reaffirm what we what we've already said, we are opposed to this project, we have reviewed the plans. And it has gotten worse, as has been noted by a previous caller, the quote, amenities that have been inserted in are not curiously shaped like units with the full bathrooms in them. So we fully expect that the unit count will grow and go up, which is fine where we are for housing, but it just points to the nature of the egregiousness of this project and trying to get more and more and more at the expense of quality of life for the neighborhood and for the tenant future tenants of this project. This brings no community benefits in only community judgments. And I thank you for your time.

 Commissioner Millman 43:25

Thank you so much. It appears that we have two more members of the public who have raised their hand and I am assuming they're here to speak on item number six on grammar see place. So let's go ahead and call the speaker's.

 43:41

Me folks for the record. Dale, you are able to unmute please proceed.

B

Brian Jett 43:47

Yes thank you I live in the neighborhood I learned solid and beautiful and part of the appeal and allure of this entire area are these amazing historic bones which the craftsmanship was unrivaled. You can't get it anywhere your beauty is unmatched and to have the complete eyesore which is a ticking a Home Depot type box in this name horrible that is ridiculously tall. And it's gotten taller every time we talked about it and it was over doesn't really want

B

Brian Jett 44:28

me whatsoever. No

B

Brian Jett 44:33

it's just it's egregious. This thing is going to be looming over the city over the communities in which the kids plan and it's going to spill resistible Jazziz cars on the streets.

C

Commissioner Millman 44:53

Thank you for your time.

B

Brian Jett 44:54

Okay

C

Commissioner Millman 44:58

Eric, please proceed.

R

Rafael Fontas 45:01

Yeah, hi, my name is Eric a guard. I'm a homeowner in Western Heights. I've lived here for about 16 years now. I chose this neighborhood to raise my family and I have three kids. And it's it's a wonderful neighborhood. It's, you know, we came here for the reasons of the people and buildings and the houses, and the community. And this project is just disgusting. It goes against everything that is important to this neighborhood. And everything that we value here. And I asked you to please, please do not hide this. And let it just continue to be a beautiful old house in a beautiful neighborhood. And not bring in some just terrible, poorly thought out poorly designed a box that eight stories now that has no connection to the neighborhood and will add no value to it. Thank you.



 Commissioner Millman 46:03

Thank you. Maria, please proceed.

 46:14

Hello, welcome. Hi. Well, thank you so much for having us. My name is Maria. I'm a fan of the Bandra Elementary School. Marina, I'm so sorry to interrupt you. We're on item number six, and seven is the elementary school. You do look forward to hearing from you in a few minutes. We will call for the speakers when we hear that item. Momentarily after we are finished with this item. So hard to find. My son came on mute. So I was my friend. No problem. We'll hear from you soon. Thank you. You're welcome. And we have someone named Jordan who has raised their hand.

 Commissioner Millman 46:57

Jordan, please proceed.

 Grace 47:03

To see Alana for the record, Jordan, I hear you very, very low. So we're not getting audio, you may want to turn up your audio on your end.

 Commissioner Millman 47:14

Or get very close to your microphone. Make sure that your microphone is not obscured by anything very faintly. By I don't so turning up the volume I don't think is going to help you get as close to the microphone as you possibly can. And speak loudly from the diaphragm please. Barely, but please go ahead.

 Commissioner Millman 47:55

We just lost you.

 48:02

As a consequence, he's now coming before you with a middle finger to your entire process. This is not a building that will provide quality housing to anyone who lives in it. Much less safety to the surrounding houses work fields will come from that dance up above ground parking right into bedrooms. There are health and safety issues. And I hope you will do your best to represent the good of the city, the good of the community and not reject this project. Thank you.



C

Commissioner Millman 48:33

Thank you. Okay, that was our last public speaker. Are we joined by council office today?

i

48:43

This evening. I'm just for the record. i Oh, it looks like we are let me promote a team.

H

HAKEEM PARKE-DAVIS (CD-10) 48:54

Hi there commissioners, Hakeem Parke-Davis, council district 10. I'm a little concerned that this project came back bigger and more intense than we had previously seen. It doesn't not appear that any of the concerns that have been discussed with this project have been addressed. Those being the issues with the project itself in terms of scale, scope, and intensity, but also the concerns with the tenants of the previously operating mens home on the site as it related to outreach and education for those tenants. It was asked of the developer to provide that to those individuals. We have not had any success with the developer and really addressing any of the concerns here. There's some concern with the implication of the density bonus that's asked of here. One of the main requirements of density bonuses really having the agency for the CPC has the agency to make this determination to assume that the incentives are required in order to provide the affordable housing costs as defined by the California Health and Safety Code. And then also, it also has agency to determine evidence since it will have a specific adverse impact upon the pelvic health, safety or physical environment on any real property that is listed in the California Register of Historic Resources, not particularly the project site instant. So I just would implore the CPC to take into account the history of this case and the agency that you have to actually make a decision to approve or deny this project. It's on the affordable housing commensurate to the requests and instances. And it is of our counsel person's opinion that these instances are egregious, to say the least. So I'll leave my comments there. And I'll thank you for this time. Have a good day.

C

Commissioner Millman 51:26

Thank you so much. I'm gonna go ahead and close the public hearing or public comment, testimony or public testimony portion of this hearing, and turn it over to staff to respond to anything you heard. Specifically, I'd like to hear about rate of return. That came up the difference between a character home or, you know, architecture with character versus the threshold for a historic cultural monument. Under the Housing Accountability Act, what sort of evidence this commission would need to determine that the incentives are not necessary to provide the amount of affordable housing and also similarly, under the Housing Accountability Act, the evidence necessary for impacts to health and safety.

S

Sergio Borough 52:31

Sergio borough city planning, I can take a stab at a few of those questions. And I'd also like to offer a few clarifications. Since the last hearing, changes to their project as outlined by rockville font, as in this presentation includes additional rec rooms and interior amenities that have been added. A portion of these amenities contribute towards the open space requirements, which is

now at 20 418 square feet instead of the previous 1500. In regards to the timeline for this project, the applicant applied for a POC project back in 2018. However, the incentives asked for did not qualify under the incentives offered in the POC program. And the applicant was advised to apply for a density bonus project with off menu incentives and waivers in order to achieve the proposed project, which we have now, in regards to the tenants, if the tenants in the current home qualify as low income, they would have the first right of return. As of today, the tenants have not provided income verification to La HD and have until the time of building permits for this project to do so. This project will also have to comply with SBA requirements are LHDs letter to planning dated March 2 2022, which is available in Exhibit A. In regards to the Housing Accountability Act, I'll defer to our city attorney. And funding is available for additional lessons as well.

C Commissioner Millman 54:15

Thank you. Thank you.

A Amy Brothers 54:17

Good morning, deputy city attorney Amy brothers and I I'm I think there are a couple of questions. Let me rephrase them with the standards of law that needs to be applied. And then if there are actual facts that are in the record, perhaps planning can talk to those. First of all, one question was, what is the evidence needed to show that this project as designed and proposed today would have significant adverse impact on a historic resource? And I'm going to answer that and then if you want to tinker with the question, please, please do I just want to give you the definition of significant adverse impact, which is the same under the Housing Accountability Act, and density bonus.

A Amy Brothers 55:12

It is this

A Amy Brothers 55:14

a significant adverse impact means a significant quantifiable, direct and unavoidable impact based on objective written public health, or safety standards. So it's really a two part, look at this, which is you're going to have to show the impact, significant quantifiable, direct, unavoidable. And it's going to have to be based on objective written public health or safety standards. Not thoughts, not speculation, actual written standards. This planning want to jump in here? Or shall I go to the let me go to the next and then when can come in? So the next question that I believe on answering is, what evidence does the CPC need to find that the incentives were not or will not be awarded? Using let me rephrase the evidence, the CPC would need to find that the incentives requested here are not needed to provide for cost of affordable housing. That's governed by density bonus law. And in density bonus law, it is assumed that the incentives for which a project qualifies and in this instance based on the affordable housing proposed it qualifies for two incentives. Those incentives must be granted. Unless the CPC can find that they are not needed to allow for affordable housing, not as a financial analysis, there

have to be there has to be evidence in the record demonstrating the finances demonstrating that those incentives are not needed to provide for affordable housing in this project. Let me since the question wasn't exactly asked, but let me go to waivers. Because waivers are not exactly the same as incentives. Incentives, there can only be three Max in any density bonus project. Here, based on the amount of affordable this project qualifies for two incentives. A waiver is slightly different. a waiver of development standards is allowed. So that the project with all the density bonus, and all the incentives for which it qualifies can be put into the building envelope. And sometimes development standards need to be waived in order to fit the bonus density bonus, and the incentives into the building envelope. In fact, the city's required to grant a waiver if a development standard would preclude construction of that building envelope. Now, when you look at whether or not a development standard should be waived. You look at the project as proposed including all the amenities, including parking, including rec room, including office space. Those are amenities. So they will have to be evidence to show that without the waivers, the project can still be built as proposed.

C Commissioner Millman 59:08

Me. So what you're saying is we can't say to the developer, under state law, we can't say you need to get rid of this amenity so that we don't have to grant the waiver. It goes the other way. They get to propose a building description and then ask for the waivers that allow them to build their project description.

A Amy Brothers 59:32

That is what the case law precedent handed by handed down by the appellate courts is saying.

C Commissioner Millman 59:47

Commissioners we have a very controversial density bonus in front of us that we've heard a couple of times. I think we've heard from the city attorney what our press Our view is, I think, based on the testimony or the discussions that we've had in the past, and the facial expressions that I see on the screen, there is frustration. I'm frustrated too. And I'm required to follow state law. And I am generally supportive of state law. We're in a housing crisis. And our legislators have passed laws in order to prevent certain communities or cities. I think, in this case, the laws were aimed at cities that have a history of exclusionary zoning to preclude them from further exclusionary practices and require a certain level of density in return for affordable housing. And I think, generally speaking, it's a wonderful law, and has allowed the city of Los Angeles to achieve a development program where nearly all multifamily housing in our city is now providing on site affordable. In this case, we have a very savvy applicant, who has come in to an area that I would not describe as an area with exclusionary zoning practices. And has availed themselves of state law and in some cases, put together multiple state laws in order to achieve this project. And I think as this case has moved forward and been continued, and been objected to, I hear them saying that they have incurred additional costs, and yes, I'm in the real estate, business time is money. And I think also they're like, Okay, you're gonna continue our case, look what we can do now. And they've done it legally. It is no less frustrating, but it is legal. What I do take issue with However, one thing that our applicant said was when they complained about having to maintain the building on site. This was a project site that was

purchased with due diligence, knowing the condition of that home. And it is the responsibility as a landlord of this project applicant to maintain that home to proper habitability standards. And I do not have any, I don't feel bad for you that you have to maintain this home that you knew was in poor repair and that you knew was old, and that you knew had tenants in it, to be habitable until you get your entitlements. That's your responsibility. As a property owner, it's your responsibility to make sure that it is a safe place for the tenants to live until such time as you get the necessary approvals to relocate these tenants. Under what I assume will be Ellis. So I have, I don't feel bad for you, please do continue to maintain it. And that's your responsibility. As far as members of the public eye, we hear you. We have read all of your letters, we have listened. We absolutely hear you. And if we had the level of discretion that we used to have on cases that came before this commission, I assure you, we would be exercising them. But in the past five to seven years, the level of discretion that we have on cases that come before this body has changed significantly. Most of the cases that we do here, instead of being zone changes, and general plan amendments, where this body could exercise a significant amount of discretion. Instead, we're getting state density bonus and TOC, which is great. We're getting onsite affordable housing. When we did not in the past. At the same time that we're getting in most cases, the Housing Accountability Act has had more teeth put into it. We're more limited in what we can ask of developers. So it's not that this commission is acting as lemming. It's that the laws have changed. The rules have changed the types of projects that become that come before this body have changed. And we're far more restricted in what we can ask of applicants. So under done To the bonus line under housing accounted Accountability Act, we would need what I assume as a performer, which, frankly, under state law used to be required of applicants to show that off menu density bonus, incentives and waivers were necessary, the state legislature decided to get rid of that requirement and operate under the assumption that the incentives being granted are necessary. And the burden of proof fell on to decision makers and members of the public to go out and hire experts to show that they're not necessary. Similarly, we would need specific, measurable quantifiable data from an objective source meaning an expert to say that there is a specific threat to health and safety in order to either deny the project or deny the categorical exemption, I would assume that correct, Amy, in order to require a greater level of environmental review.

A

Amy Brothers 1:06:13

The standard for requiring greater environmental review would be the same across all projects. It's it's not to this one.

C

Commissioner Millman 1:06:21

And it's there needs to be specific quantifiable,

A

Amy Brothers 1:06:26

right, I mean, we typically, infill is a class 32 exemption, there would have to be something very particular unique, special about the hazards of this project that would justify going beyond the class 32.



C

Commissioner Millman 1:06:43

And so, I think as shocked as we are to see a project that because of the site constraints is a very small narrow lot is saying they need these incentives. And they need these waivers that are grossly out of scale, with the surrounding community, double the height, completely covering the lot area, we do not have the specific quantifiable evidence in the record necessary to deny this case under state law. And so even though every fiber of my being would like to make modifications to this, I'd like to see something built there. I'd like to see density. And I'd like to see on site affordable, I'd like to see it presented differently. I'd like to see a different project, I don't have that discretion, I have to follow the law. And therefore I feel for me, I have no choice, but to approve this project. I look forward to hearing from my colleagues. And if anyone does have specific and measurable data, I'd love to hear it. Maria

M

Maria Cabildo 1:08:07

President Milner, thank you. I have just some additional questions that may be technical. So I added up the amount of additional spaces, conference rooms, golf houses, co working spaces, rec rooms. And as a total of 6874 feet I noticed that there's a typical size oh one bedroom or studio and they have those full baths. Do we have discretion to eliminate things like full baths? Because I just think it's very odd. The one place you would expect a bath which is the gym doesn't have one. I see deputy director of labor shaking her head and we get

L

Lisa Weber 1:08:56

Yeah, this is Lisa lever. Yeah, we really don't have discretion to to dictate the placement of bathrooms in those recreation spaces.

M

Maria Cabildo 1:09:07

What is that placement but why do they need showers and baths ducts?

C

Commissioner Millman 1:09:11

Well, that that would be a question for the for the applicant.

M

Maria Cabildo 1:09:17

Okay, because I think that's very unusual. Maybe

L

Lisa Weber 1:09:18

maybe that would be a you know, something to



L Lisa Weber 1:09:24
request of the applicant?

M Maria Cabildo 1:09:25
Yeah, I understand that. I also noticed in the in the floorplan that there are walls. They're kind of great divisions within those spaces that you would expect to be open spaces. So I don't know if that's trying to demarcate future bedroom space on the part of the obligate I guess.

L Lisa Weber 1:09:45
Yes. And Commissioner Cabildo. We have certainly seen this. It is permissible that an applicant after the certificate of occupancy can come back in and do a commit version of, you know, what's what's non habitable? Like, you know, recreation spaces, laundry room spaces of that sort. Garage spaces, Conversions can occur to accessory dwelling units in multifamily developments.

M Maria Cabildo 1:10:19
So does do they have to meet affordability requirements. If there's a conversion, are there? Is there a certain percentage that needs to be affordable?

C Commissioner Millman 1:10:28
I don't know that information off the top of my head. I'm looking at Michelle, if she does, that might be something we have to get back to you on.

M Michelle Sing 1:10:36
Myself seeing I would I would get back to meet in the law and allows a 25% conversion, but it's silent as far as I can see on the affordability requirements.

M Maria Cabildo 1:10:46
And if there was a affordability requirement, what our governing body has the power to impose that.

C Commissioner Millman 1:10:54
Well, la HD is is really the city agency that manages all covenanted affordable units

—

M

Maria Cabildo 1:11:02

open if there's not an existing law that requires the conversions to comply with affordability requirements, then LHD doesn't have the power to act. That would be correct. So would that be the city council? Would it be at the state level? Like where does that happen? Well,

L

Lisa Weber 1:11:18

it would be a state mandate, you know, the state provides sets the regulatory environment for all accessory dwelling units.

M

Maria Cabildo 1:11:27

Okay, so that's, that's great. And I guess I will let I'm looking forward to hearing from the rest of the commissioners. I listened to the tapes. And I thought it was very fitting the use of egregious disrespectful. And this is my second time on the planning commission. And last time I found in the planning commission, there were times that I approved projects, and I was really proud of what we approved. And there were times that I had a hole of my nose, and was disgusted by what was being proposed. This is an instance that disgusts me. I am really offended as a longtime affordable housing advocate that the developer is saying we need housing. And we have to rush and do this. And we have to approve with a monstrous project. Because I know that the majority of these units aren't going to go to the people with the affordable housing need. We have a need in LA county of half a million units affordable to low income households, and that it's not who's going to be living in this building. So I have not moved for his call to suddenly be an affordable housing advocate, and try to meet our Rena numbers. Because we do really great at meeting our high end read the numbers we do. On our lower level Rena numbers, so I'm not moved. I don't think he's housing advocate. I think that this is just great. So thank you very much for the opportunity to speak.

C

Commissioner Millman 1:13:07

Thank you, Dana.

D

Dana M. Perlman 1:13:12

Thank you. And I'm so glad to hear once again. Rick builders voice on this commission. However loud IT projects or doesn't project it is very powerful. And and I share your concerns, as you heard from the prior meetings, I'm extremely disappointed in this just disappointment is such a weak understatement. And unfortunately, when you and I served previously, Maria, we used we had more authority, we had more discretion, as Samantha said, it's changed dramatically. And this is one of the problems I see with when Sacramento and well meaning legislators there who seek frustration, as Matt said, with certain jurisdictions who do not take their role seriously to add to work to expand housing. I think sometimes they paint with a brush that's a bit too broad. And the splatter is falls on us. And as a result, we're stuck with projects like this, which really are an abomination I feel for the community here. I really do. I feel for the neighbors on the north, we're going to have this exhaust pumping out five feet away from

them. And if we had some evidence in the record that I know is out there, but we don't have it in the record. Nobody's presented it to us to show the damage of that neighboring exhausts on that Nate on that existing structure. The homeowner says, Well, I can't do it on the other the builder can't do it on the other side, because maybe someone will build their well that's pure speculation and conjecture. What we know is someone does have have a home and live on the north side. And unfortunately, there's nothing in the record that we have to point to. Which is, I think, a shame. I appreciate how many members of the community have come to multiple meetings have written very powerful letters, I share your frustration. I wish that that fell within our authority, but it does not. Unfortunately, one of the gentleman's had we need to do planning? Well, you're right, we do need to do planning. I think all of us sitting on this commission, and staff we take very, we take great pride in what roles we have, and we do our best to plan. But we have to do it within the scope of the law. And unfortunately, as as, as Samantha, I think, rightly pointed out, we just don't have discretion here. There's very little for us, I, I wonder why we even have this, we're spending our time, all of us having to spend the last hour and a half going through this because there's our hands are tied. And unfortunately, we will have to I will have to plug my nose and stick my fingers in my ears and everything else to vote for this project. And it's not something I it's not something I relish.

C Commissioner Millman 1:16:22

Thank you, Dana. Any other comments? Seeing none, Commissioner learn?

H Helen Leung 1:16:34

Don't have anything needs to add other than I agree with what my fellow Commissioners have said, I always look at Commissioner Perlman to think like can he find something that is grounded in law to figure out an alternative. And I think that as much as we would like to approve the appeal, we would just be entangled in lawsuits and set the city up to spend our limited resources fighting, a case that we're not able to win. So I think this is the you know, as as much as density bonus has created so many needed projects. I think this is probably the example of when state law like this kind of goes wrong. And I wish it could be a different outcome when they want to, I still think that it is important that community members fought and delayed and continue to work on a better outcome. And I wish that we were in the place that we can do something to support that. And I'm sorry that we can't. Thank you.

D Dana M. Perlman 1:17:41

Can I quickly I just want to piggyback on something Alan just said, I hope that many members out there on this project will be extremely frustrated and dejected. But I hope they continue to remain vigilant and engage and involve the vast majority of developers and applicants, at least we see and I know that staff sees are not like this applicant. And they do try to build something that they will feel proud of and that there is going to fit into their community and work with their community. It's a shame that this applicant is gaming the system. But I certainly hope that the overwhelming majority of developers out there people who want to invest their their dollars and their property in in building a future will remain determined and work with their

neighbors to build things that work for the neighborhood that fit in that architecturally belong, that have open space that are places people are going to want to call home. And so with that, let's say when else has anything else to say, I would bring your motion

C Commissioner Millman 1:18:55

Dana before you bring a motion, I just have to say, again, I'm gonna hold my nose and vote for this because that's what I'm required to do under state law. I saw a middle finger to the community. The last time we heard this case, it just became more vigorous. I think that this applicant is buoyed by organizations whose work I usually am very supportive of who are looking to try to get a commission like ours, to say no, so they can make a point about state law and the needs to comply with it. And I think they've done it by building the most proposing the most provocative out of scale project possible, and basically saying, I dare you. That's what I think this project is. I'm offended by it. But I have no choice but to vote for it. So Dana, please go ahead and make your motion.

D Dana M. Perlman 1:19:58

Actually I would love for someone else to make them wish to know the more I think about it. I don't know what my name is someone who moved to Poland.

C Commissioner Millman 1:20:07

This is Commissioner Millman and I'm gonna go ahead and move steps recommended actions on this item.

C Caroline Choe 1:20:17

Airline show I will second

 1:20:22

Thank you Cynthia Lemme for the record Commission President Millman Yes. We can vice president toe? Yes. Commissioner Zamora? Yes. Mr. Perlman. Yes. Commissioner. Yes. Commissioner Camila.

M Maria Cabildo 1:20:43

holding the nose and say yes. Because this project sticks.

G Grace 1:20:49

Thank you and the motion carries.



Commissioner Millman 1:20:51

Thank you. And thank you again to all the members of the public who invested so much of your personal time to communicating with us. We really did hear you and we're sorry.

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October 25, 2022

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RE: City of Los Angeles's 1848 South Gramercy Place (Case Nos. CPC-2020-2115-DB-HCA; ENV-2020-2116-CE; Related Case Nos. PAR-2020-3292-VHCA & CHC-2018-3217-HCM); Planning Commission Hearing, Agenda Item No. 7

Honorable Ms. Millman and Planning Commissioners:

On behalf of the Southwest Regional Council of Carpenters (“**Southwest Carpenters**” or “**SWRCC**”), my Office is submitting these comments for the City of Los Angeles’s (“**City**”) October 27, 2022 Planning Commission meeting for the 1848 South Gramercy Place Project (“**Project**”).

The SWRCC is a labor union representing 57,000 union carpenters in six states, including California, and has a strong interest in well-ordered land use planning and in addressing the environmental impacts of development projects.

Individual members of SWRCC live, work, and recreate in the City and surrounding communities and would be directly affected by the Project’s environmental impacts.

SWRCC reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearing and proceeding related to this Project. Gov. Code, § 65009, subd. (b); Pub. Res. Code, § 21177, subd. (a); see *Bakersfield Citizens for Local*

Control v. Bakersfield (2004) 124 Cal.App.4th 1184, 1199-1203; see also *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal.App.4th 1109, 1121.

SWRCC incorporates by reference all comments raising issues regarding the Environmental Impact Report (EIR) submitted prior to certification of the EIR for the Project. See *Citizens for Clean Energy v City of Woodland* (2014) 225 Cal.App.4th 173, 191 (finding that any party who has objected to the project’s environmental documentation may assert any issue timely raised by other parties).

Moreover, SWRCC requests the City provide notice for any and all notices referring or related to the Project issued under the California Environmental Quality Act (**CEQA**) (Pub. Res. Code, § 21000 *et seq.*), and the California Planning and Zoning Law (“**Planning and Zoning Law**”) (Gov. Code, §§ 65000–65010). California Public Resources Code Sections 21092.2, and 21167(f) and California Government Code Section 65092 require agencies to mail such notices to anyone who has filed a written request for them with the clerk of the agency’s governing body.

The City should require the Project to be built using local workers who have graduated from a Joint Labor-Management Apprenticeship Program approved by the State of California, have at least as many hours of on-the-job experience in the applicable craft which would be required to graduate from such a state-approved apprenticeship training program, or who are registered apprentices in a state-approved apprenticeship training program.

Community benefits such as local hire can also be helpful to reduce environmental impacts and improve the positive economic impact of the Project. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project site can reduce the length of vendor trips, reduce greenhouse gas emissions, and provide localized economic benefits. As environmental consultants Matt Hagemann and Paul E. Rosenfeld note:

[A]ny local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site. [EXHIBITS A-C](#)

Workforce requirements promote development of skilled trades that yield sustainable economic development. As the California Workforce Development Board and University of California, Berkeley Center for Labor Research and Education found:

[L]abor should be considered an investment rather than a cost—and investments in growing, diversifying, and upskilling California’s workforce can positively affect returns on climate mitigation efforts. In other words, well-trained workers are key to delivering emissions reductions and moving California closer to its climate targets.¹

Further, workforce policies have significant environmental benefits given they improve an area’s jobs-housing balance, decreasing the amount and length of job commutes and associated greenhouse gas (GHG) emissions. On May 7, 2021, the South Coast Air Quality Management District found the “[u]se of a local state-certified apprenticeship program” can result in air pollutant reductions.²

Locating jobs closer to residential areas can have significant environmental benefits. As the California Planning Roundtable noted in 2008:

People who live and work in the same jurisdiction would be more likely to take transit, walk, or bicycle to work than residents of less balanced communities and their vehicle trips would be shorter. Benefits would include potential reductions in both vehicle miles traveled and vehicle hours traveled.³

Moreover, local hire mandates and skill-training are critical facets of a strategy to reduce vehicle miles traveled (VMT). As planning experts Robert Cervero and Michael Duncan have noted, simply placing jobs near housing stock is insufficient to

¹ California Workforce Development Board (2020) Putting California on the High Road: A Jobs and Climate Action Plan for 2030 at p. ii, *available at* <https://laborcenter.berkeley.edu/wp-content/uploads/2020/09/Putting-California-on-the-High-Road.pdf>.

² South Coast Air Quality Management District (May 7, 2021) Certify Final Environmental Assessment and Adopt Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions Program, and Proposed Rule 316 – Fees for Rule 2305, Submit Rule 2305 for Inclusion Into the SIP, and Approve Supporting Budget Actions, *available at* <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10>.

³ California Planning Roundtable (2008) Deconstructing Jobs-Housing Balance at p. 6, *available at* <https://cproundtable.org/static/media/uploads/publications/cpr-jobs-housing.pdf>

achieve VMT reductions given that the skill requirements of available local jobs must match those held by local residents.⁴ Some municipalities have even tied local hire and other workforce policies to local development permits to address transportation issues. Cervero and Duncan note that:

In nearly built-out Berkeley, CA, the approach to balancing jobs and housing is to create local jobs rather than to develop new housing. The city's First Source program encourages businesses to hire local residents, especially for entry- and intermediate-level jobs, and sponsors vocational training to ensure residents are employment-ready. While the program is voluntary, some 300 businesses have used it to date, placing more than 3,000 city residents in local jobs since it was launched in 1986. When needed, these carrots are matched by sticks, since the city is not shy about negotiating corporate participation in First Source as a condition of approval for development permits.

Recently, the State of California verified its commitment to workforce development through the Affordable Housing and High Road Jobs Act of 2022, also known as Assembly Bill No. 2011 (“**AB2011**”). AB2011 amended the Planning and Zoning Law to allow ministerial, by-right approval for projects being built alongside commercial corridors that meet affordability and labor requirements.

The City should consider using local workforce policies and requirements to benefit the local area economically and mitigate greenhouse gas, improve air quality, and reduce transportation impacts.

Construction work is defined as a Lower to High-risk activity for COVID-19 spread by the Occupational Safety and Health Administration. Recently, several construction sites have been identified as sources of community spread of COVID-19.⁵

⁴ Cervero, Robert and Duncan, Michael (2006) Which Reduces Vehicle Travel More: Jobs-Housing Balance or Retail-Housing Mixing? *Journal of the American Planning Association* 72 (4), 475-490, 482, *available at* <http://reconnectingamerica.org/assets/Uploads/UTCT-825.pdf>.

⁵ Santa Clara County Public Health (June 12, 2020) COVID-19 CASES AT CONSTRUCTION SITES HIGHLIGHT NEED FOR CONTINUED VIGILANCE IN SECTORS THAT HAVE REOPENED, *available at* <https://www.sccgov.org/sites/covid19/Pages/press-release-06-12-2020-cases-at-construction-sites.aspx>.

SWRCC recommends the Lead Agency adopt requirements to mitigate public health risks from the Project's construction activities. SWRCC requests the Lead Agency require safe on-site construction work practices as well as training and certification for any construction workers on the Project Site.

SWRCC recommends the Lead Agency require that while construction activities are being conducted at the Project Site:

Construction Site Design:

- Project Site will be limited to two controlled entry points.
- Entry points will have temperature screening technicians taking temperature readings when the entry point is open.
- Temperature Screening Site Plan shows details regarding access to the Project Site and Project Site logistics for conducting temperature screening.
- A 48-hour advance notice will be provided to all trades prior to the first day of temperature screening.
- The perimeter fence directly adjacent to the entry points will be clearly marked indicating the appropriate 6-foot social distancing position for when you approach the screening area. Please reference the Apex temperature screening site map for additional details.
- Clear signage will be posted at the project site directing you through temperature screening.
- Provide hand washing stations on the construction site.

Testing Procedures:

- The temperature screening used are non-contact devices.
- Temperature readings will not be recorded.
- Personnel will be screened upon entering the testing center and should only take 1-2 seconds per individual.

- Hard hats, head coverings, sweat, dirt, sunscreen or any other cosmetics must be removed on the forehead before temperature screening.
- Anyone who refuses to submit to a temperature screening or does not answer the health screening questions will be refused access to the Project Site.
- Screening will be performed at both entrances from 5:30 am to 7:30 am.; main gate [ZONE 1] and personnel gate [ZONE 2]
- After 7:30 am only the main gate entrance [ZONE 1] will continue to be used for temperature testing for anybody gaining entry to the project site such as returning personnel, deliveries, and visitors.
- If the digital thermometer displays a temperature reading above 100.0 degrees Fahrenheit, a second reading will be taken to verify an accurate reading.
- If the second reading confirms an elevated temperature, DHS will instruct the individual that he/she will not be allowed to enter the Project Site. DHS will also instruct the individual to promptly notify his/her supervisor and his/her human resources (HR) representative and provide them with a copy of Annex A.

Planning

- Require development of an Infectious Disease Preparedness and Response Plan that includes basic infection prevention measures (requiring the use of personal protection equipment), policies and procedures for prompt identification and isolation of sick individuals, social distancing (prohibiting gatherings of more than 10 people including all-hands meetings and all-hands lunches) communication, training, and workplace controls that meet standards that may be promulgated by the Center for Disease Control, Occupational Safety and Health

Administration, Cal/OSHA, California Department of Public Health or applicable local public health agencies.⁶

Finally, SWRCC has also developed a rigorous Infection Control Risk Assessment (“ICRA”) training program to ensure it delivers a workforce that understands how to identify and control infection risks by implementing protocols to protect themselves and all others during renovation and construction projects in healthcare environments.⁷

ICRA protocols are intended to contain pathogens, control airflow, and protect patients during the construction, maintenance and renovation of healthcare facilities. ICRA protocols prevent cross contamination, minimizing the risk of secondary infections in patients at hospital facilities.

The City should require the Project to use a workforce trained in ICRA protocols.

I. THE PROJECT WOULD BE APPROVED IN VIOLATION OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

A. Background Concerning the California Environmental Quality Act

CEQA has two basic purposes. First, CEQA is to inform decision makers and the public about the potential, significant environmental effects of a project. (CEQA Guidelines § 15002(a)(1).) “Its purpose is to inform the public and its responsible officials of the environmental consequences of their decisions *before* they are made. Thus, the EIR ‘protects not only the environment but also informed self-government.’ [Citation.]” (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564.)

Second, CEQA directs public agencies to avoid or reduce environmental damage when possible by requiring alternatives or mitigation measures. (CEQA Guidelines § 15002(a)(2) and (3); *see also*, *Berkeley Keep Jets Over the Bay Committee v. Board of Port Com'rs* (2001) 91 Cal.App.4th 1344, 1354 (“*Berkeley Jets*”); *Citizens of Goleta Valley v. Board*

⁶ *See also* The Center for Construction Research and Training, North America’s Building Trades Unions (April 27 2020) NABTU and CPWR COVID-19 Standards for U.S. Construction Sites, *available at* https://www.cpwr.com/sites/default/files/NABTU_CPWR_Standards_COVID-19.pdf; Los Angeles County Department of Public Works (2020) Guidelines for Construction Sites During COVID-19 Pandemic, *available at* https://dpw.lacounty.gov/building-and-safety/docs/pw_guidelines-construction-sites.pdf.

⁷ For details concerning Southwest Carpenters’s ICRA training program, *see* <https://icrahealthcare.com/>.

of Supervisors (1990) 52 Cal.3d 553; *Laurel Heights Improvement Ass’n v. Regents of the University of California* (1988) 47 Cal.3d 376, 400.)

While the courts review an EIR (or CEQA exemption) using an “abuse of discretion” standard, “the reviewing court is not to ‘*uncritically* rely on every study or analysis presented by a project proponent in support of its position.’ A ‘clearly inadequate or unsupported study is entitled to no judicial deference.’” (*Berkeley Jets*, 91 Cal.App.4th 1344, 1355 (emphasis added) (quoting *Laurel Heights*, 47 Cal.3d at 391, 409 fn. 12).)

Where the Lead Agency chooses to dispose of CEQA by asserting a CEQA exemption, it has a duty to support its CEQA exemption findings by substantial evidence, including evidence that there are no applicable exceptions to exemptions. This duty is imposed by CEQA and related case law. (Guidelines § 15020; *Citizens for Environmental Responsibility v. State ex rel. 14th Dist. Ag. Assn.* (2015) 242 Cal.App.4th 555, 568; *Association for Protection etc. Values v. City of Ukiah* (1991) 2 Cal.App.4th 720, 732.)

The duty to support CEQA (and/or exemption) findings with substantial evidence is also required by the Code of Civil Procedure and case law on administrative or traditional writs. (See, Code of Civil Procedure (“CCP”) § 1094.5(b); *Topanga Assn. for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 515.)

Further, CEQA exemptions must be narrowly construed to accomplish CEQA’s environmental objectives. (*California Farm Bureau Federation v. California Wildlife Conservation Bd.* (2006) 143 Cal.App.4th 173, 187.)

II. THE PROJECT DOES NOT QUALIFY FOR A DENSITY BONUS, INCENTIVES, CONCESSIONS OR WAIVERS, AS A MATTER OF LAW.

The Project and its CEQA exemption must be denied as it violates various laws.

A. The Project Does Not Qualify for a Density Bonus or Incentives.

State Density Law imposes a strict replacement requirement when the Project will in fact demolish the existing affordable units or displace low-income people. (Govt. Code § 65915(c)(3)(A)-(D).) The Project fails to meet this replacement requirement since it demolishes an affordable home of over 3,700 sf. and displaces over two dozens of low-income adults but provides no equivalent replacement or relocation.

B. The Project Does Not Qualify for Incentives or Waivers.

First, City can deny incentives or concessions under Govt. Code § 65915(d), if it makes written findings supported with substantial evidence that the requested

incentives “do not result in identifiable cost reductions to provide for affordable housing costs.” Here, City can make such findings since there is such substantial evidence in the record that the Project’s 33 units and incentives to support those solely seek to maximize the Applicant’s profits rather than compensate for the affordable housing costs of 3 units. The Project *reduces* rather than *provides* affordable housing.

Further, City can deny incentives since the Project, with its mass and scale, reduced setbacks, reduced open space, and close proximity to the nearby residential building, and its location within methane zone, in a commercial corner (“CDD”) while evading CDD requirements, and as well as its evasion of replacement requirements, including under the applicable Redevelopment Plan (RDP) constitutes substantial written evidence that the Project may have adverse impacts on human health and safety.

Lastly, City can deny incentives because those would violate state density bonus law, for failure to comply with replacement requirements.

Next, City can deny the Project’s *waivers* since those are allowed only when the zoning regulations physically preclude the development of the *allowed* density. As such, waivers are similar to variances (requiring specific findings including those of physical hardship and no detriment) and involve physical hardship, as compared with other lots. Here, no such physical preclusion or hardship applies. In fact, allowing such mass and scale and waivers will result in illegal spot zoning and illegal privilege to Applicant.

Finally, despite housing crisis, the State of California has made it clear that production of housing or affordable housing does not trump or override the state’s environmental concerns or human health and safety and CEQA remains a superior competing interest. (Govt. Code § 65589.5(d).) As detailed below, the Project violates CEQA.

In sum, the Project’s density bonus, incentives or waivers should not be approved.

III. THE PROJECT IS NOT ELIGIBLE FOR A CEQA EXEMPTION.

The Project should not be approved also because it does not qualify for the Class 32 CEQA exemption the City invoked under Guidelines § 15332.

A. The Project Is Not Consistent with GP and Zoning Regulations.

The Project does not meet Class 32 exemption’s *consistency* prong under Guidelines § 15332(a), as shown by the Project’s requested (and undisclosed) many incentives, waivers, variances, deviations that are not warranted by law. (*See*, Sec. II, *supra*.) The

Project is inconsistent with various RDP requirements, which City failed to properly consider, contrary to ruling in *Aids Healthcare Foundation v. City of LA, et al.*

Lastly, City's Class 32 *consistency* finding focused only on the Project's *consistencies* with GP and omits *inconsistencies* in density, open space, historical, affordability and other requirements, as prescribed by GP, recently updated Community Plan (part of GP), CPIO, RDP, CDD, and *other* zoning regulations.

B. The Project May Have Traffic, Air, Noise, Water Quality Impacts.

There is substantial evidence in the record that the Project – with its mass and scale, waivers, variances and evasions (e.g., RDP, CUP/CDD) – will have significant traffic, air, and noise. City's contrary findings are unsupported and clearly erroneous. So is the City's reliance on regulatory compliance measures.

C. Class 32 Does Not Apply In View of Applicable Exceptions.

Guidelines § 15300.2(b), (c) and (f) exclude categorical exemptions, including Class 32, if a project may have cumulative impacts, significant impacts due to unusual circumstances, and impacts to historical resources. All three apply here. First, the site is immediately across from another 64-unit project at 1375 W. Washington blvd., but is not mentioned by the City for cumulative impacts. Also, City's cumulative analysis is improperly limited to 500 feet radius. Second, due to the Project's unusual mass/scale and design features, location in methane zone, commercial corner, within RDP, the Project may have adverse impacts. Third, the Project site itself contains a building of *historical significance*, proposed to be demolished. The fact it was not registered as a *Historical Monument* is not dispositive.

IV. CONCLUSION.

In view of the aforementioned, we request to deny the Project and its CEQA exemption(s) and to require compliance with all laws, regulations, and CEQA.

If the City has any questions or concerns, please feel free to contact my Office.

Sincerely,



Stephanie Papayanis

Attorneys for Southwest Regional
Council of Carpenters

LAURA MEYERS

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October 24, 2022

City Planning Commission
RE: CPC-2020-2115-DB (HCA), 1848 S Gramercy Place

Dear Commissioners:

I am writing you today, once again, about this proposed massively-oversized, 31,263-square-foot, seven-story, 75-foot tall building on a single city parcel with nearly 100% lot coverage, little to no setbacks, two above-ground levels of parking, for 33 units, 3 of which are affordable building that essentially covers the entire lot with a minimal 5-foot setback at the rear. It is a project that dislodges longtime residents (my neighbors) who are members of a protected class; a project that is actually inconsistent with the underlying zoning; and is a project that also is inconsistent with the still-extant redevelopment plan.

Appended to this letter are a few selected pages from the Mid-City Recovery Redevelopment Project Redevelopment Plan, which overlays this parcel (thus its land use regulations govern the project, along with other zoning requirements). I have also included some recommendations for alternative Findings at the end of this letter.

As I have previously noted, and despite the repeated statements by Planning Staff, you are NOT required to approve all of this project's requested waivers and incentives (see discussion below).

Applicant asks for 2 incentives (the maximum allowed under both state and city regulations for this level of affordability) and then a self-described additional 8 "waivers," some of which are not waivers of development standards but rather are requests to vary from the zoning. This is beyond unreasonable.

In the face of an out-of-character, out-of-scale project that will displace neighbors and tower over a neighborhood, please find the strength to *just.say.no*.

You are able to do so.

I read with interest a prior letter submitted by attorney Mitchell M. Tsai, representing the Southwest Regional Council of Carpenters, in which he noted that the City can deny both the incentives and the waivers.

Regarding the incentives, he writes that the "*City can deny incentives or concessions under Govt. Code 65915(d), if it makes written findings supported with substantial evidence that the requested incentives 'do not result in identifiable cost reductions to provide for affordable housing costs.'* Here, City can make such findings since there is such substantial evidence in the record that the Project's 33 units and incentives to support those solely seek to maximize the Applicant's profits rather than compensate for the affordable housing costs of 3 units. The Project in fact reduces rather than provides affordable housing."

Indeed, the requested incentives do appear only to be necessary to achieve Applicant's personal vision or, rather, Applicant's challenge to the City wherein Applicant demands to be allowed to build whatever Applicant can think of, no matter the zoning.

Even the updated Staff Recommendation report prepared for this October 27th hearing acknowledges that the Applicant[s] “*view this option [to reduce the number of units and/or parking spaces] as contrary to their financial interests, claiming that it is only a matter of time until much of Washington Boulevard in this area has taller buildings.*”

Whether or not Applicant’s crystal ball predicting the future comes true at some point...this project is **NOT on Washington Boulevard**, but rather is placed adjacent to and facing the residential properties on South Gramercy Place.

In addition, according to Tsai (and I concur), the “*City can deny incentives since the Project, with its mass and scale, reduced setbacks, reduced open space, and close proximity to the nearby residential building, and its location within methane zone, in a commercial corner (“CDD”) while evading CDD requirements, and as well as its evasion of replacement requirements, including under the applicable Redevelopment Plan (RDP), constitutes substantial written evidence that the Project may have adverse impacts on human health and safety.*”

Regarding the Applicant’s requested waivers, my opinion is that many of these particular requests actually constitute variances to the underlying zoning (and, in the case of the redevelopment plan, “variations” – a different word with the same core meaning). The Redevelopment Plan makes clear that the “Agency” – now the City as the Successor to the Agency – may decide to approve a variance/variation when certain conditions are met, and it may not do so if those conditions are not met.

For purposes of the Redevelopment Plan, no variations are allowed except minor departures from the Plan’s provisions, and only when there are “exceptional circumstances... that do not apply generally to other properties.” Inarguably, every parcel in this zone is subject to the same (not different or exceptional) requirements of FAR, setbacks, height, lot coverage, etc.

Aside from the Redevelopment Plan, the zoning itself is C1.5-1VL-CPIO. Let’s examine that zoning designation: the 1VL height is a part of the zoning (e.g. not a development standard) and limits the height to 45 feet or 3 stories. The CPIO zoning does the same, while making exceptions for affordable housing, but limited exceptions. To vary from the zoning would require a “variance” – not a “waiver.”

The Staff Report references two housing laws/ statutes, *CA Govt. Section 69515(c)(1)*, and *LAMC 12.22 Sec. 25*, as the fundamental reasons for approving Applicant’s requests. *LAMC 12.22 Sec. 25* states in its preamble that it was adopted to implement *Gov. Code section 69515 through 65918*, in order “to increase the production of affordable housing, consistent with City policies.”

But contrary to the recommendations and the instructions in the Staff Recommendation Report, *Section 69515(c)(1)* does NOT require that you approve any and all requested incentives. Rather, *Section 69515(c)(1)* says that only “*When a proposed housing development project complies with applicable, objective general plan, zoning, and subdivision standards and criteria, including design review standards, in effect at the time that the application was deemed complete,*” does the decision-maker need to do an additional, over-riding finding of adverse effect to deny a project. Given that this proposed project does not comply with any of this, the Commission is able to deny, or approve the density bonus but none of the incentives, without a separate finding of adverse effect.

Furthermore, as Tsai writes, the “City can deny the Project’s *waivers* since those are allowed only when the zoning regulations physically preclude the development of the *allowed* density. As such, waivers are similar to variances (requiring specific findings including those of physical hardship and no detriment) and involve physical hardship, as compared with other lots. Here, no such physical preclusion or hardship applies. In fact, allowing such mass and scale and waivers will result in illegal spot zoning and illegal privilege to Applicant.”

For clarity, under both state and city statutes, this project qualifies automatically for two incentives only. But instead of selecting On-Menu incentives, the Applicant is requesting off-menu incentives that are wildly out-of-compliance with the zoning, the CPIO Neighborhood-Serving Corridor Subarea. The CPIO contains additional regulations for ground floor and building height (including transitional height), floor area, and building design.

Also, the aforementioned Mid-City Recovery Redevelopment Plan includes specific policies, goals and requirements, including a requirement when two or more incentives are requested that the decision-maker “shall find that the project provides for an arrangement of uses, Buildings, Structures, open spaces and other improvements that are compatible with the scale and character of the adjacent properties and surrounding neighborhood.” Based on the application, other evidence presented, and testimony, the Commission cannot make that Finding.

You have received multiple other communications objecting to this project, and its CEQA clearance (e.g., that it does not qualify for a Categorical Exemption). I won’t repeat everything here.

But as I requested in June, I once again ask that the Commissioners **DENY** the requested actions, **FIND** that the requested incentives do not comply with *Government Code Section 69515(c)(1)*, and *LAMC Section 12.22 A.25(c)*, **FIND** that the requested waivers do not meet the criteria set forth in *LAMC Section 12.22 A.25(c)*, and that the Commission **NOT ADOPT** the categorical exemption as a CEQA clearance for this proposed project.

I therefore ask that you please make these (or similar) Alternative Findings:

1). **That LAMC Section 12.22.A.25 does not permit an off-menu incentive to “permit a Floor Area Ratio of 5.1:1 in lieu of 1.5:1 permitted in the LAMC.”** This code section only permits a “not to exceed” FAR of 3:1.¹

2). **That LAMC Section 12.22.A.25 does not allow an off-menu incentive to “permit a 7-story building with a height of 75 feet (to the rooftop parapet) in lieu of 45 feet otherwise permitted in the C2 zone.”** This code section states that in zones that limit the height, such as the subject zoning, it only permits “a maximum of 11 feet or one story, whichever is lower.” Applicant is requesting an 80% increase in height.² Additionally, when approving a height increase, it is coupled with the requirement of increased setbacks; since this is an ordinance, requesting relief as a “waiver” for

¹ (4) **Floor Area Ratio.**

(i) A percentage increase in the allowable Floor Area Ratio equal to the percentage of Density Bonus for which the Housing Development Project is eligible, not to exceed 35%; **or** (ii) In lieu of the otherwise applicable Floor Area Ratio, a Floor Area Ratio not to exceed 3:1, provided the parcel is in a commercial zone in Height District 1 (including 1VL, 1L and 1XL), and fronts on a Major Highway as identified in the City’s General Plan, **and** a. the Housing Development Project includes the number of Restricted Affordable Units sufficient to qualify for a 35% Density Bonus, **and** b. 50% or more of the commercially zoned parcel is located in or within 1,500 feet of a Transit Stop/Major Employment Center.

² (5) **Height.** A percentage increase in the height requirement in feet equal to the percentage of Density Bonus for which the Housing Development Project is eligible. This percentage increase in height shall be applicable over the entire parcel regardless of the number of underlying height limits. For purposes of this subparagraph, Section 12.21.1 A.10. of this Code shall not apply.

(i) In any zone in which the height or number of stories is limited, this height increase shall permit a maximum of eleven additional feet or one additional story, whichever is lower, to provide the Restricted Affordable Units.

(a) No additional height shall be permitted for that portion of a of a building in a Housing Development Project that is located within fifteen feet of a lot classified in the R2 Zone.

(b) For each foot of additional height the building shall be set back one horizontal foot.

Waivers Nos. B and C is not allowed because this is not a development standard when coupled with an incentive, but rather it is a requirement of the incentive.

3). Regarding the requested waivers, **That LAMC Section 12.22.A.25 does not permit nor require the Commission to approve reductions in setbacks, open space or lot coverage when the “landscaping for the Housing Development Project” is not “sufficient to qualify for the number of landscape points equivalent to 10% more than otherwise required by Section 12.40 of this Code and Landscape Ordinance Guidelines ‘O.’”** The Commission is not required to approve waivers of development standards when a project is subject to other discretionary approvals; the approval of the requested off-menu incentives is discretionary.

4). Additionally, that the request to vary so far from the underlying zoning of 1VL **constitutes a variance from the zoning**, and is not in fact a request for an incentive or waiver.

5). That **the project DOES NOT provide for an arrangement of uses**, Buildings, Structures, open spaces and other improvements that are compatible with the scale and character of the adjacent properties and surrounding neighborhood, as required by the Mid-City Recovery Redevelopment Plan.

6). That the applicant has not provided written documentation in the record that any waivers or modifications of development standards are required to make the affordable units economically feasible, as required by **LAMC Section 12.22.A.25 (8)(g)(3)**.

Thank you very much,

Laura Meyers

REDEVELOPMENT PLAN
FOR THE
MID-CITY RECOVERY REDEVELOPMENT PROJECT

ADOPTED: 5/10/96
ORDINANCE NO. 171064

PREPARED BY THE
THE COMMUNITY REDEVELOPMENT AGENCY OF
THE CITY OF LOS ANGELES, CALIFORNIA

§ 105. Project Objectives

The objectives of this Project with respect to the Project Area are as follows:

1. Promote the elimination and prevention of blight and deterioration, and promote the conservation, rehabilitation, renewal and redevelopment of the Project Area to the extent permitted by law and specified in this Plan.
2. Encourage the involvement and participation of residents, business persons, property owners, public agencies, and community organizations in the redevelopment and revitalization of the community.
3. Preserve and increase employment, business, and investment opportunities through redevelopment programs, and to the greatest extent feasible, promote these opportunities for all residents.
4. Support and encourage the development of social service facilities and programs, with special consideration given to projects involving community based organizations that serve the homeless and senior citizens, and that provide child care services and other social services, such as gang prevention and intervention, counseling and programs for teenagers, to enable the development of a community with a variety of lifestyles.
5. Improve the quality of the environment, promote a positive image for the Project Area, and provide a safe environment through mechanisms such as:
 - a. adopting land use standards;
 - b. promoting architectural and urban design standards including standards for: height; building setback; continuity of street facade; building materials; compatibility of new construction with existing structures; and concealment of mechanical appurtenances;
 - c. promoting landscape criteria and planting programs;
 - d. encouraging maintenance of the built environment;
 - e. promoting sign and billboard standards;
 - f. coordinating the provision of high quality public improvements;
 - g. promoting rehabilitation and restoration guidelines;
 - h. integrating public safety concerns into planning efforts, including standards for fences and barriers, and investigating alternative security measures;

Policy of this Plan includes urban design standards including building setbacks, continuity of street facade and compatibility of new construction with existing structures, along with concealing mechanicals

§ 513. Utilities

The Agency shall require that all utilities be placed underground when physically and economically feasible, as determined by the Agency.

§ 514. Parking and Loading Facilities

Parking shall be provided in a manner consistent with standards for contemporary development practices, but in no case shall parking be less than the requirements of the Los Angeles Municipal Code. No parking space shall be located in a front setback area except with prior written approval of the Agency. Parking spaces shall be paved and drained so that storm and surface waters draining from parcels will not cross public sidewalks. Parking spaces visible from streets shall be landscaped in accordance with the City's zoning ordinance to prevent unsightly or barren appearance. Lighting for parking spaces shall be shielded from adjacent properties and adjoining streets.

Off-street loading facilities for commercial and industrial uses shall be located in a manner to avoid interference with public use of sidewalks and in conformance with the Los Angeles Municipal Code. Off-street loading facilities must also be screened by landscaping to the extent and in the manner required by the Agency.

Agency may establish setbacks that exceed City ordinance

§ 515. Setbacks

All setback areas shall be landscaped and maintained by the owner. Any portion necessary for access shall be paved. The Agency may establish setback requirements for new development within the Project Area which may exceed the requirements of the City's zoning ordinance.

Must be compatible in appearance

§ 516. Incompatible Uses

No use or structure, which by reason of appearance, traffic, smoke, glare, noise, odor or similar factors that would be incompatible with the surrounding areas or structures, shall be permitted in any part of the Project Area. Within the Project Area, except with the approval of the Agency, there shall be no extraction of oil, gas or other mineral substances, nor any opening or penetration for any purpose connected therewith within 500 feet of the surface.

§ 517. Resubdivision of Parcels

After rehabilitation and/or development pursuant to this Plan, no parcel, including any parcel retained by a conforming owner or participant, shall be resubdivided without Agency approval.

§ 518. Minor Variations

The Agency is authorized to permit a variation from the limits, restrictions and controls established by this Plan. In order to permit such variation, the Agency must determine that:

1. The application of certain provisions of this Plan would result in practical difficulties or unnecessary hardships which would make development inconsistent with the general purpose and intent of this Plan; or

No variation allowed except one that is a minor departure from the provisions, and only if there are exceptional circumstances

- 2. There are exceptional circumstances or conditions applicable to the property or to the intended development of the property which do not apply generally to other properties having the same standards, restrictions and controls; and
- 3. Permitting a variation will not be materially detrimental to the public welfare or injurious to property or improvements in the area or contrary to the objectives of this Plan or the applicable Community Plan.

No variation shall be granted which changes a basic land use or which permits other than a minor departure from the provisions of this Plan. In permitting any such variation, the Agency shall impose such conditions as are necessary to protect the public health, safety or welfare, and to assure compliance with the purposes of this Plan. Any variation permitted by the Agency hereunder shall not supersede any other approval required under City codes and ordinances.

§ 519. Nondiscrimination and Nonsegregation

There shall be no discrimination or segregation based upon race, color, creed, religion, sex, marital status, disability, national origin or ancestry permitted in the sale, lease, sublease, transfer, use, occupancy, tenure or enjoyment of property in the Project Area.

Design Guidelines require open space and good design.

§ 520. Design Guidelines

Within the limits, restrictions and controls established in this Plan, the Agency is authorized to establish heights of buildings, land coverage, setback requirements, design criteria, traffic circulation, traffic access, and other development and design controls necessary for the proper development of both private and public areas within the Project Area.

No new improvement shall be constructed and no existing improvement shall be substantially modified, altered, repaired, or rehabilitated except in accordance with this Plan and any such controls, and in accordance with architectural, landscape and site plans submitted to and approved in writing by the Agency. One of the objectives of this Plan is to create an attractive and pleasant environment in the Project Area. Therefore, such plans shall give consideration to good design, open space and other amenities to enhance the aesthetic quality of the Project Area. The Agency shall not approve any plans that do not comply with this Plan.

Applicable design guidelines shall be utilized, look at CPIO

§ 521. Variances, Conditional Use Permits, Building Permits and Other Land Development Entitlements

No zoning variance, conditional use permit, building permit, demolition permit or other land development entitlement shall be issued in the Project Area from the date of adoption of this Plan unless and until the application therefor has been reviewed by the Agency and determined to be in conformance with this Plan and any applicable design guidelines.

No permits shall be issued for the construction of any new building or any addition to or rehabilitation of an existing building in the Project Area until the application for such permit has been processed in the manner provided. Any permit that is issued hereunder must be in conformance with the provisions and intent of this Plan.



June 21, 2022

City Planning Commission

RE: CPC-2020-2115-DB (HCA), 1848 S Gramercy Place

Dear Commissioners:

West Adams Heritage Association has submitted several previous letters regarding 1848 S. Gramercy Place. We are appalled that any developer would think that, just because they have an overly-grand (or greedy) idea for building an oversized project anywhere they would like...that that would mean it "must" be approved. In this case, the Applicant is simply asking for too much – ten so-called "waivers" which in fact consist primarily of variances to zoning. We would therefore simply ask you to NOT APPROVE this proposed housing project, or at least NOT APPROVE the majority of the requested incentives and adjustments/waivers.

There are so many continuing issues with this project and the process that brought us here today:

- It is not true that you are required to approve all aspects of this density bonus project. Both state law and the LAMC contain "caveats" and exceptions that permit the Commission to make Findings disallowing the requested variances from the project site's zoning. The proposed project is not consistent with the C1.5-1VL-CPIO zoning nor the stated policies and requirements of the Mid City Corridor Redevelopment Plan.
- Of strong concern: Staff has repeatedly selected only some community comments (emails & letters) to include in the Staff Recommendation Reports for the March 24, 2022 hearing and the June 23, 2022 hearing. Some letters are included. However, neither of Laura Meyers's previous letters are included. Nor were emails from several neighbors who live 100 feet from the project, and several other WAHA members who also copied us on these communications over time. Nor was at least one other community member's detailed letter regarding the requirements of the Redevelopment Plan. What else was excluded? A public process is to be a transparent process. What information is being hidden from the public, and the Commissioners, due to this *selectivity* on the part of Staff?
- The updated Staff Report references a meeting between Staff and Applicant in early April where the Applicant acknowledged to Staff the need to do more community outreach. First, there was between then and now no such outreach. Not only was WAHA never contacted (again, despite two letters in the file), our understanding is that none of the neighbors (many of whom belong to our organization) were contacted either. The local neighborhood associations (Western Heights, and Angelus Vista) and the Neighborhood Council (UNNC) also were not contacted. **IMPORTANTLY, why would Staff only write about the promise? Shouldn't Staff have verified whether or not Applicant really did the task before issuing this new Report – finalized two months after Staff met with Applicant?**
- Similar is the continued lack of Staff effort to fact-check the assertion that the house is vacant (it is not; as of this morning, there are 7 cars visibly parked at the premises and they do move around.) Yet on page A-2 of the supplemental report it still states that the house is vacant. How many other "facts" are also not factual?

The proposed project at 1848 S. Gramercy Place proposes the construction of an over-bulked, 31,263-square-foot, seven-story, 75-foot tall building (not counting the additional 11 feet for a staircase tower that rises above the roofline) on a single city parcel with nearly 100% lot coverage, little to no setbacks, two above-ground levels of parking, for 33 units, 3 of which are affordable. Applicant asks for 2 incentives (the maximum allowed under both state and city regulations for this level of affordability) and then a self-described additional 8 "waivers," some of which are not waivers of development standards but rather are requests to vary from the zoning.

Keep in mind that the zoning itself is C1.5-1VL-CPIO: the 1VL height is a part of the zoning (e.g. not a development standard) and limits the height to 45 feet or 3 stories. The CPIO zoning does the same, while making exceptions for affordable housing, but limited exceptions. To vary from the zoning would require a "variance" – not a "waiver."

It will fill nearly every spec of space on its lot. It will tower over the neighborhood. At a 5.1:1 FAR, its by right square footage of 9,195 more than triples. The building will have no common open space, nor a pedestrian-oriented plaza; it will have little-to-no landscaping, and will decimate one or two mature street trees. Worse of all, it will displace low-income residents/renters who have been living in this house, which has operated as a supportive housing group home/dormitory for nearly two decades.

WAHA asks that you DENY approval of the eight requested waivers. We ask that you examine closely whether you are required to approve the two off-menu incentives, neither of which are supported in state law or the Los Angeles Municipal Code section cited by Staff in the Recommendation Report. I urge that you reject the Categorical Exemption as a CEQA clearance, given that this discretionary project does not comport with, and is not in compliance with, the zoning, the CPIO or the Redevelopment Plan. Clearly this project is an exception to the exemption.

WAHA notes that the lack of housing, including emergency shelter, is a critical statewide problem. We know that lack of supply and rising costs are compounding inequality and limiting advancement opportunities for many Californians. That's the reasoning behind recently enacted state laws that require approvals of many – but not all – proposed housing projects.

This proposed housing development project is one of the exceptions. It is inconsistent with multiple zoning ordinances and land use designations; and in multiple ways it is not in compliance, and not in conformity, with “an applicable plan, program, policy, ordinance, standard, requirement, or other similar provision” as required by Government Code Section 69515(c)(1).

The Planning Department memos on implementing California's housing and density bonus laws note that Developers can *request* off-menu incentives and waivers of development standards that extend beyond the incentives enumerated by State law provided that applicants can demonstrate that their request is necessary to allow for the project's economic feasibility.

What the Staff memos do not say is that the requests **need not be granted** if the proposed project is objectively non-compliant with previously-adopted plans, zoning or local standards. Specifically, when one reads the entirety of the law, it says that cities, including charter cities (Los Angeles) cannot turn down a proposed development if it complies with applicable, objective zoning standards (uniform benchmarks), including design standards.

Since this project **DOES NOT** comply with those benchmarks, the City need not make a finding of specific, adverse effect.

Government Code Section 65915 does mandate that the City grant a density bonus when a project provides a specified amount of affordable housing. For this proposed project at 1848 S. Gramercy Place, which is offering 10% of the units as Very Low Income units, the City shall approve, according to Section 65915, “Two incentives or concessions for projects that include at least 17 percent of the total units for lower income households, at least 10 percent for very low income households...” The LAMC describes those specific incentives and their requirements. The Applicant is asking for “incentives” that are far in excess to those listed in the LAMC, and therefore you don't need to say “yes.”

However, the Applicant is requesting two incentives PLUS eight “waivers” (concessions). You do not need to approve any nor all of the waivers/concessions – just two out of ten of the combined incentives and waivers.

This project's Applicant is not arguing that the combined incentives and waivers/concessions are necessary for the physical construction of a project but rather, that the Applicant wants all of these concessions to build it the way the Applicant envisioned and designed it. This is circular thinking. It would lead to the conclusion that anyone can ask for anything, in any zone in the City – so long as they are also building a couple of affordable housing units – and receive a yes answer, *no matter what*. This defies logic. Why would we have any zoning at all? Or a City Planning Commission? Or so-called discretionary projects, if there is no discretion to make informed judgements?

Can anyone build a megastructure anywhere in Los Angeles, just because they want to?

Thank you for your consideration.

Jean Frost, Vice President, West Adams Heritage Association, preservation@westadamsheritage.org

Postscript dated October 24, 2022: Supplemental to this 6/21/2022 letter, a notation regarding CEQA -- Planning Staff has accepted the argument that the 1908 House at 1848 S. Gramercy Place is not historic because it was not found to be eligible as an individual "landmark" Historic Cultural Monument (HCM). However, City Planning had previously surveyed the property and found it to be a Contributor to what was then called the "18th Street District" within Angelus Vista. CEQA does apply to such properties, since CEQA addresses "historic resources" not specifically Los Angeles HCMs. It should not be categorically exempt for the CEQA clearance, and we support other comments to this effect. The Survey is attached and incorporated into this PDF. In addition, the CRA redevelopment plan regulations supercede and was in effect previous to the Applicant's requests.



March 21, 2022

Los Angeles City Planning Commission

RE: *CPC-2020-2115-DB (HCA), 1848 S Gramercy Place*

Dear Commissioners:

West Adams Heritage Association (WAHA) routinely comments on planning issues affecting the West Adams area. We are concerned about the proposal for this 33-unit, 7-story project with virtually no setbacks, no communal open space and no landscaping at this site.

WAHA supports sensitive infill housing, both market rate and affordable, but not at the expense of the soon-to-be-displaced neighbors. For clarity, the Staff Recommendation Report is mistaken in calling this house “vacant” when actual visitors to the site can testify otherwise. As of this writing, the house is occupied by a group of tenants who have been there for many years. Cars drive in and out, and park at the house; men socialize on the front porch, and every Monday morning the normal trash is set out for pick up. People visibly live there.

Regarding the project being proposed: It is so out of character with the neighborhood and so out of conformance with all the Redevelopment Plan and CPIO and zoning regulations that on its face it ought not to be subject to a categorical exemption (CE). This is described in more detail below.

To base this CE upon a Class 32 categorical exemption to environmental review under CEQA is inapplicable because the Project is inconsistent with City planning and zoning policies, goals, and regulations. The use of a categorical exemption is also unavailable because the Project may have aesthetic and cultural resource impacts on this historic West Adams neighborhood (Angelus Vista), at both a Project and cumulative level. Further, the Project is inconsistent with the Mid City Corridors Recovery Redevelopment Plan requirements for compatibility.

There are cumulative effects of multiple demolitions in the City Planning Department’s own identified historic district (e.g., the District formerly called the “18th Street Neighborhood Historic District”). For purposes of CEQA, the District need not be designated to require a further investigation into impacts and exploration of alternatives and/or mitigations. A CE is not appropriate. A categorical exemption is not the appropriate level of environmental review for a project that is highly discretionary, is in a historically sensitive environmental and fails to meet objectives of the community plan and redevelopment plan.

The project will have a demonstrable significant effect on the environment and does not qualify under Article III, Class 32 exemption.

The Class 32 “Infill” Categorical Exemption (CEQA Guideline Section 15332), hereafter referred to as the Class 32 Exemption, exempts infill development within urbanized areas if it meets certain criteria. **The class consists of environmentally benign infill projects that are consistent with the General Plan and Zoning requirements.** This class is not intended for projects that would result in any significant traffic, noise, air quality, or water quality impacts. The sheer number of waivers requested to justify this project calls into serious question any compatibility with the adopted Community Plan, its CPIO, and the Redevelopment Plan.

A CE should not be issued when there are unusual circumstances creating the reasonable possibility of significant effects; the project may result in damage to scenic resources, including, but not limited to, **trees**, historic buildings, rock outcroppings, or similar resources. This project appears to be specifically removing a mature Camphor tree in the public realm/parkway, and also appears to endanger the adjacent (likely protected) mature Sycamore tree also in the parkway, on the lot line (its roots would not survive the construction at a zero-foot setback).

A categorical exemption also should not be issued when there are sensitive issues and the project fails to comply with the redevelopment plan, CPIO and the community plan’s stated objectives. To permit a CE in this case would cause irreparable and irreversible harm to the environment.

Here are just a few of the land use issues where the project is non-conforming and is in conflict:

The zone is C1.5-1VL-CPIO. The 1-VL is a height district ("very low") with a maximum of 3 stories and 45 feet. The normal density bonus incentive is one more story and 11 more feet. Why would 7 stories and 76 feet ever be deemed appropriate? It is out of character with any building currently existing on Washington Boulevard from Figueroa until at least Culver City, except for the one building, *Casa Vertigo* on Oak Street.

For the CPIO, there is a required front yard setback of 10 feet that seems to have disappeared from all discussions in the Staff Recommendation Report. In any case, noting there are conflicting regulations, the Mid-City Recovery Redevelopment Plan (which is also an "overlay" like a specific plan over the underlying zoning) does require that setbacks be compatible with adjacent properties as one of many components to be considered before approving a design or approving discretionary actions, and there is no language in the CPIO overriding that requirement.

The project is exceptionally over-reaching and even its two density bonus incentives are categorized as "off-menu"; it asks for multiple "waivers" (versus incentives) yet provides few public benefits in return. The project will displace, and has begun to displace, 20-25 low-income individuals. Only 3 ELI affordable units are offered in return. Why wouldn't more RSO/affordable units be required?

Why has applicant continued to state the residence is in use as a "single family home" when it is observable and provable, in the City's own records, that the use is and has been for a long-time supportive housing/boarding house/dormitory?

The redevelopment plan specifically says its policy is to NOT displace individuals or families of low or moderate income; and that the Redevelopment Plan does not permit any variation (e.g., variances or other discretionary grants) that would be "contrary to the objectives of this Plan."

The 1907-1908 house is identified this house as a Contributor to the "18th Street Neighborhood" historic district (essentially the Angelus Vista Tracts I and II, and adjacent smaller tracts). That this is not an HCM does not dismiss its Contributor status to a potential historic district; and the Cultural Heritage Commission's action was appropriately silent as to that. Also, one of the policies within the Redevelopment plan is that the City shall "encourage historic preservation" (page 25, #700).

Unfortunately, though the City has now adopted that historic district as the "Angelus Vista Character Residential Overlay District CPIO" (excluding commercially-zoned properties in that overlay but that doesn't mean they no longer contribute to the underlying historic district) – the community has experienced since that adoption multiple demolitions of historic homes after the effective date of the Character Residential District in late December, 2018. The demolitions include 1509 S. Gramercy Pl.; 1537 S. Wilton Pl.; 1839 S. Gramercy Pl. (across from the Subject property); 1540 and 1546 S. St. Andrews Pl.; and 1660 S. Arlington, all of which were constructed between 1903 and 1910 and represent the remaining original homes. Several other homes from that era are facing demolition, including 1310 S. St. Andrews and the subject property at 1848 S. Gramercy Place. Technically, this series of demolitions is a cumulative effect that would be an exception that disallows the use of a categorical exemption.

The Redevelopment Plan also specifically states that setbacks may be established that exceed the requirements of the City's zoning ordinance(s) and it also places an emphasis on "adequate amounts of affordable housing."

It is concerning that the application seems nowhere to relate to the Redevelopment Plan which we understand to be in effect as an overlay through the year 2028.

The waiver requests appear excessive and contrary to the Redevelopment Plan and CPIO. Lot coverage is not 30% but rather 88%. The setbacks are insufficient. A 60% reduction of open space cannot be justified. Balconies are being counted as open space and this ignores the environmental need for green space and landscaping. There are significant impacts to adjacent properties in massing, scale and air quality. The developer needs to look at underground parking to reduce mass. The developer is not conforming to the area's most basic environmental needs nor responding to the CPIO and Redevelopment Plan.

If the developer proceeds with this project as currently designed and proposed, it will not meet the qualifications for a categorical exemption. Therefore, WAHA asks that the Commission send this project back to planning for environmental review and not adopt the CE.

Roland Souza, President, West Adams Heritage Association
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president@westadamsheritage.org OR roland.e.souza@gmail.com

D R A F T

Historic Studies Section

Community Plan Revision Program

Historic Resources Final Report
for the
South Central Los Angeles
District Plan Area

Work Product 5D

June 21, 1996

Prepared For:

The City of Los Angeles
Department of Planning

Prepared By:

Richard Starzak
MYRA L. FRANK & ASSOCIATES, INC.

in conjunction with:

Leslie Heumann
LESLIE HEUMANN & ASSOCIATES

and:

THE LOS ANGELES CONSERVANCY

SOUTH CENTRAL LOS ANGELES DISTRICT PLAN -- LIST OF POTENTIAL HISTORIC RESOURCES

LOCATION OF RESOURCE	HISTORIC NAME	YEAR BUILT	EVALUATION	DESCRIPTION	ARCHITECT/ BUILDER	SOURCE AND/ OR SIGNIFICANCE	PHOTO NO. & DATE
1645 S GRAMERCY PL		1906 C.	eD	AMERICAN FOURSQUARE/ CLASSICAL BOX, 2-STORY RESIDENCE		LADOP 1995 SURVEY PART OF THE 18TH STREET NEIGHBORHOOD	067-14 05/15/1995
1651-1653 S GRAMERCY PL		1908	eD	CRAFTSMAN/ TUDOR REVIVAL, 2 1/2-STORY RESIDENCE		LADOP 1995 SURVEY PART OF THE 18TH STREET NEIGHBORHOOD	067-13 05/15/1995
1657 S GRAMERCY PL		1904 C.	c/eD	AMERICAN FOURSQUARE/ CRAFTSMAN/ QUEEN ANNE, 2 1/2-STORY RESIDENCE		LADOP 1995 SURVEY PART OF THE 18TH STREET NEIGHBORHOOD	067-12 05/15/1995
1815 S GRAMERCY PL		1908	eD	CRAFTSMAN/ TUDOR REVIVAL, 2-STORY RESIDENCE		LADOP 1995 SURVEY PART OF THE 18TH STREET NEIGHBORHOOD	067-21 05/15/1995
1818 S GRAMERCY PL		1904	eD	CRAFTSMAN/ TUDOR REVIVAL, 2-STORY RESIDENCE		LADOP 1995 SURVEY PART OF THE 18TH STREET NEIGHBORHOOD	067-05 05/15/1995
1828 S GRAMERCY PL		1907 C.	eD	CRAFTSMAN/ FOLK VICTORIAN, 2-STORY RESIDENCE		LADOP 1995 SURVEY PART OF THE 18TH STREET NEIGHBORHOOD	067-06 05/15/1995
1829 S GRAMERCY PL		1908	eD	CRAFTSMAN/ TUDOR REVIVAL, 2-STORY RESIDENCE		LADOP 1995 SURVEY PART OF THE 18TH STREET NEIGHBORHOOD	067-11 05/15/1995
1829 S GRAMERCY PL		1908	eD	CRAFTSMAN/ CLIPPED GABLE, 2-STORY RESIDENCE		LADOP 1995 SURVEY PART OF THE 18TH STREET NEIGHBORHOOD	067-20 05/15/1995
1834 S GRAMERCY PL		1905	eD	SHINGLE/ CRAFTSMAN/ CLEFT GABLE, 2-STORY RESIDENCE		LADOP 1995 SURVEY PART OF THE 18TH STREET NEIGHBORHOOD	067-07 05/15/1995
1834 S GRAMERCY PL		1905	eD	AMERICAN FOURSQUARE, 2-STORY RESIDENCE		LADOP 1995 SURVEY PART OF THE 18TH STREET NEIGHBORHOOD	067-18 05/15/1995
1835 S GRAMERCY PL		1909	c/eD	CRAFTSMAN/ TUDOR REVIVAL, 2-STORY RESIDENCE		LADOP 1995 SURVEY PART OF THE 18TH STREET NEIGHBORHOOD	067-10 05/15/1995
1839 S GRAMERCY PL		1906	eD	AMERICAN FOURSQUARE, 2-STORY RESIDENCE		LADOP 1995 SURVEY PART OF THE 18TH STREET NEIGHBORHOOD	067-09 05/15/1995
1848 S GRAMERCY PL	Subject Property	1905 C.	eD	CRAFTSMAN/ TUDOR REVIVAL, 2-STORY RESIDENCE		LADOP 1995 SURVEY PART OF THE 18TH STREET NEIGHBORHOOD	067-08 05/15/1995
1849 S GRAMERCY PL		1906 C.	eD	SHINGLE/ CRAFTSMAN, 2-STORY RESIDENCE		LADOP 1995 SURVEY PART OF THE 18TH STREET NEIGHBORHOOD	067-19 05/15/1995
2223 S GRAMERCY PL		1908	e/cD	CRAFTSMAN/ TUDOR REVIVAL, 2 1/2-STORY RESIDENCE		LADOP 1995 SURVEY PART OF THE SUGAR HILL SHINGLE AND CRAFTSMAN DISTRICT SITUS ADDRESS A.K.A. 2219 S. GRAMERCY PLACE	065-09 05/09/1995
2229 S GRAMERCY PL		1908	cD	SHINGLE/ CRAFTSMAN, 2-STORY RESIDENCE		LADOP 1995 SURVEY PART OF THE SUGAR HILL SHINGLE AND CRAFTSMAN DISTRICT	065-08 05/09/1995
2301 S GRAMERCY PL		1905	cD	SHINGLE/ CRAFTSMAN, 2-STORY RESIDENCE		LADOP 1995 SURVEY PART OF THE SUGAR HILL SHINGLE AND CRAFTSMAN DISTRICT	064-17 05/09/1995

SOUTH CENTRAL LOS ANGELES DISTRICT PLAN AREA

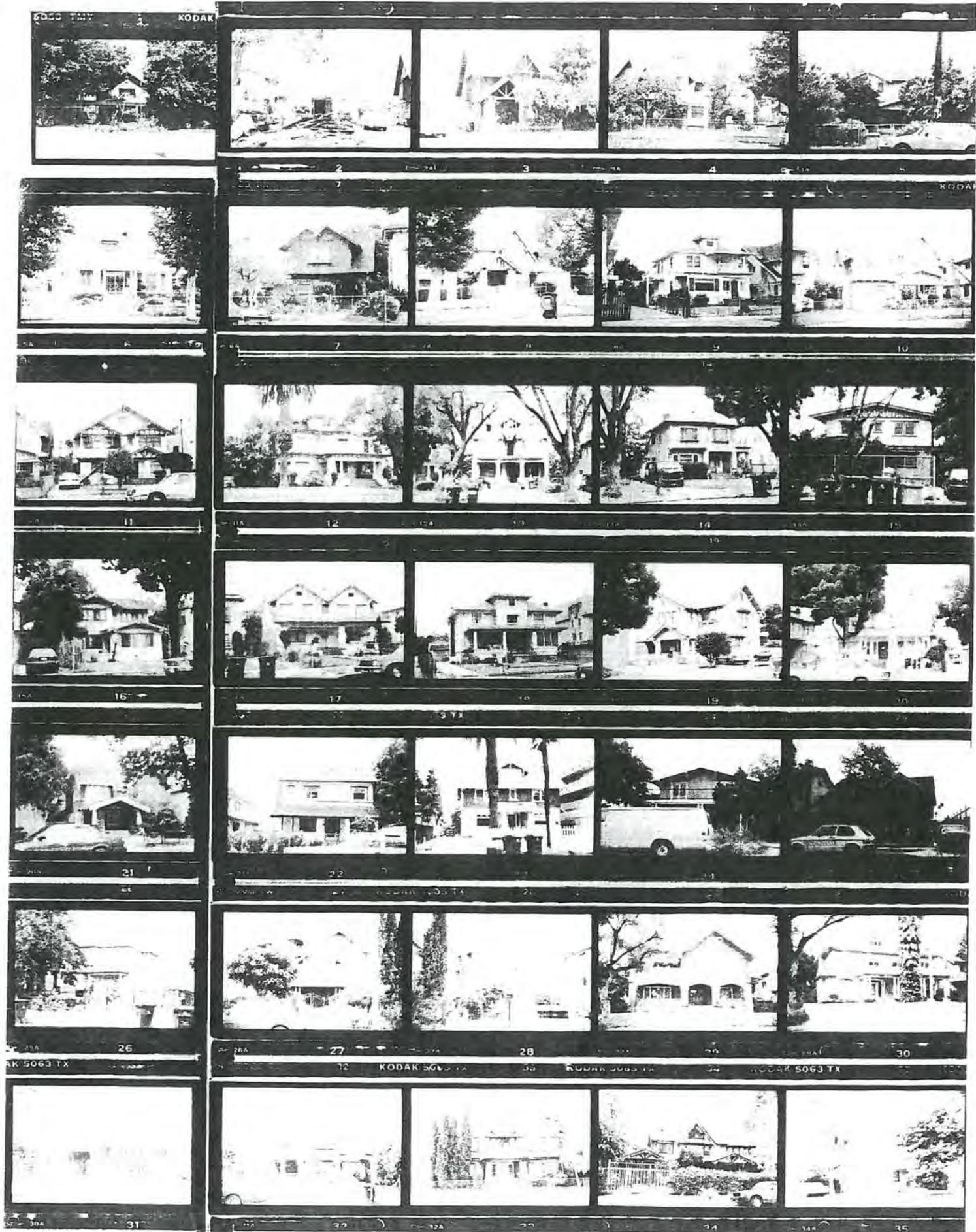
HISTORIC RESOURCES PHOTOGRAPHS -- PLATE 67

Subject
Property

Photo No.	Photo Date	Location of Resource	Historic or Common Name or Description
067-01	05/15/1995	1609 S WILTON PL	SHINGLE/CRAFTSMAN, 2-STORY RESIDENCE
067-02	05/15/1995	1614 S GRAMERCY PL	SHINGLE/CRAFTSMAN, 2-STORY RESIDENCE
067-03	05/15/1995	1618 S GRAMERCY PL	CRAFTSMAN/CENTER GABLE, 2-STORY RESIDENCE
067-04	05/15/1995	1624 S GRAMERCY PL	CRAFTSMAN/SIDE GABLE, 2-STORY RESIDENCE
067-05	05/15/1995	1818 S GRAMERCY PL	CRAFTSMAN/TUDOR REVIVAL, 2-STORY RESIDENCE
067-06	05/15/1995	1828 S GRAMERCY PL	CRAFTSMAN/FOLK VICTORIAN, 2-STORY RESIDENCE
067-07	05/15/1995	1834 S GRAMERCY PL	SHINGLE/CRAFTSMAN/CLEFT GABLE, 2-STORY RESIDENCE
067-08	05/15/1995	1848 S GRAMERCY PL	CRAFTSMAN/TUDOR REVIVAL, 2-STORY RESIDENCE
067-09	05/15/1995	1839 S GRAMERCY PL	AMERICAN FOURSQUARE, 2-STORY RESIDENCE
067-10	05/15/1995	1835 S GRAMERCY PL	CRAFTSMAN/TUDOR REVIVAL, 2-STORY RESIDENCE
067-11	05/15/1995	1829 S GRAMERCY PL	CRAFTSMAN/TUDOR REVIVAL, 2-STORY RESIDENCE
067-12	05/15/1995	1657 S GRAMERCY PL	AMERICAN FOURSQUARE/CRAFTSMAN/QUEEN ANNE, 2 1/2-STORY RESIDENCE
067-13	05/15/1995	1651-1653 S GRAMERCY PL	CRAFTSMAN/TUDOR REVIVAL, 2 1/2-STORY RESIDENCE
067-14	05/15/1995	1645 S GRAMERCY PL	AMERICAN FOURSQUARE/CLASSICAL BOX, 2-STORY RESIDENCE
067-15	05/15/1995	1808 SAINT ANDREWS PL	CRAFTSMAN/FRONT GABLE, 2-STORY RESIDENCE
067-16	05/15/1995	1814 SAINT ANDREWS PL	CRAFTSMAN, 2-STORY RESIDENCE
067-17	05/15/1995	1824 SAINT ANDREWS PL	CRAFTSMAN/SIDE GABLE, 2-STORY RESIDENCE
067-18	05/15/1995	1834 S GRAMERCY PL	AMERICAN FOURSQUARE, 2-STORY RESIDENCE
067-19	05/15/1995	1849 S GRAMERCY PL	SHINGLE/CRAFTSMAN, 2-STORY RESIDENCE
067-20	05/15/1995	1829 S GRAMERCY PL	CRAFTSMAN/CLIPPED GABLE, 2-STORY RESIDENCE
067-21	05/15/1995	1815 S GRAMERCY PL	CRAFTSMAN/TUDOR REVIVAL, 2-STORY RESIDENCE
067-22	05/15/1995	1639 S GRAMERCY PL	CRAFTSMAN/FLARED ROOF, 2-STORY RESIDENCE
067-23	05/15/1995	1615 S GRAMERCY PL	CRAFTSMAN/SIDE GABLE, 2 1/2-STORY RESIDENCE
067-24	05/15/1995	1828 S MANHATTAN PL	CRAFTSMAN/FRONT GABLE, 2-STORY RESIDENCE
067-25	05/15/1995	1838-1840 S MANHATTAN PL	CRAFTSMAN/SIDE GABLE, 1 1/2-STORY DUPLEX
067-26	05/15/1995	1831 S MANHATTAN PL	AMERICAN FOURSQUARE/CLASSICAL BOX, 2-STORY RESIDENCE
067-27	05/15/1995	1829 S MANHATTAN PL	CRAFTSMAN/TUDOR REVIVAL, 2 1/2-STORY RESIDENCE
067-28	05/15/1995	1825 S MANHATTAN PL	CRAFTSMAN/SIDE GABLE, 2 1/2-STORY RESIDENCE
067-29	05/15/1995	1326 S MANHATTAN PL	SHINGLE/CRAFTSMAN/ASHLAR MASONRY, 2-STORY RESIDENCE
067-30	05/15/1995	1400 S MANHATTAN PL	MISSION REVIVAL/COLONIAL REVIVAL, 2-STORY RESIDENCE
067-31	05/15/1995	1404 S MANHATTAN PL	CRAFTSMAN/TUDOR REVIVAL, 2-STORY RESIDENCE
067-32	05/15/1995	1510 S MANHATTAN PL	CRAFTSMAN/ASHLAR MASONRY, 2 1/2-STORY RESIDENCE
067-33	05/15/1995	1555 S MANHATTAN PL	CRAFTSMAN/TUDOR REVIVAL, 2-STORY RESIDENCE
067-34	05/15/1995	1547 S MANHATTAN PL	CRAFTSMAN/TUDOR REVIVAL, 2-STORY RESIDENCE
067-35	05/15/1995	1533 S MANHATTAN PL	CRAFTSMAN/CLASSICAL REVIVAL INFLUENCE, 2 1/2-STORY RESIDENCE

South Central District Plan Area

Date: 05/15/95 Roll: 067



LEVEL 5 IS LISTED OR APPEARS ELIGIBLE FOR LISTING UNDER A LOCAL LANDMARK ORDINANCE

- 5 Is listed under a local landmark ordinance.
- 5P Appears eligible for listing under a local landmark ordinance as a result of a previous survey, and/or a visual analysis substantiated by research.
- e Appears eligible for listing under a local landmark ordinance as a result of a visual analysis only.
- 5D Is listed as a contributor to a locally designated historic district or preservation area.
- 5PD Appears eligible for listing as a contributor to a potential locally designated historic district or preservation area as a result of a previous survey, and/or a visual analysis substantiated by research. In a thematic group, this evaluation is meant to define that the resource was previously evaluated, although not necessarily as part of the thematic group established as a result of the LADOP 1991 Survey.
- eD Appears eligible for listing as a contributor to a potential locally designated historic district or preservation area as a result of a visual analysis only. In the case of a thematic group, this evaluation indicates that the resource had not been previously evaluated in any known documentation.

Los Angeles Planning Department, Historic Studies Section
Community Plan Revision Program
"List of Potentially Significant Historic Resources for the
South Central Los Angeles District Plan Area,"
June 21, 1996

Authors: Richard Starzak, MYRA L. FRANK & ASSOCIATES, INC.,
in conjunction with:
Leslie Heumann, LESLIE HEUMANN & ASSOCIATES

THE 18TH STREET NEIGHBORHOOD
(AKA Angelus Vista + Angelus Vista #2 tracts)

The 81 buildings that are part of the 18th Street Neighborhood were all constructed from 1904 to 1917. 89% of the buildings are 2 stories in height while 9% of the buildings are 1 story in height. Of the architectural styles represented: 19% are Craftsman; 14% are Craftsman/Tudor Revival; 11% are Shingle/Craftsman; 10% are Craftsman/Side Gable; 6% are Craftsman/Folk Victorian; 5% are American Foursquare; 4% are Shingle; 1% are Craftsman/Oriental Influence; 1% are Mediterranean Revival/Moorish; 1% are Craftsman/Shingle; 4% are Craftsman/Flared Roof; 1% are Craftsman Shed Dormer; 2% are American Foursquare/Classical Revival; 1% are Shingle/Classical Revival; 5% are Craftsman/Cross Gable; 1% are Craftsman/Arroyo Stone; 1% are Craftsman/Ashlar Masonry; 1% are Shingle/Craftsman W/Arroyo Stone Details; 1% are Colonial Revival; 1% are Craftsman/Center Gable.

Address ranges:

1619-1839 S VAN NESS AVE

1625-1841 CIMARRON ST

1609-1847 S WILTON PL

1614-1849 S GRAMERCY PL¹ **See footnote below, includes 1848 S. Gramercy Place**

1808-1824 SAINT ANDREWS PL

1825-1838 S MANHATTAN PL

1996 general description:

Each district, cluster, or neighborhood has been selected on the basis of some consistent theme or unifying features, whether it be style of architecture, period of construction, or even scale. Several important criteria are used to determine qualification as a type of district, namely: the group should exhibit architectural quality and integrity, that is, lack intrusions of non-compatible structures and significant alterations; the group should exhibit an overall quality of design, preferably anchored by exceptional individual examples; the group should have definable geographic boundaries; and the character and quality of the group should be significant relative not only to the immediate area, but also to the overall City of Los Angeles.... A cluster is a small group of structures, usually less than 10. A district represents a larger area, often exceeding the length of a block. A neighborhood may be much larger in size and less dense than a district, usually because many structures which have become isolated are still significant examples of style, but probably would not otherwise qualify for individual monument status.

¹ Includes 1848 S. Gramercy Place, identified as a Contributor and described as a Craftsman-Tudor. See spreadsheet.



March 21, 2022

Rafael Fontes, Planning Assistant

rafael.fontes@lacity.org

(213) 978-1179

Dear City Planning Commission,

We are writing to you in support of the proposed 33-unit mixed use development, including 3 affordable units, at 1848 South Gramercy Place, cases CPC-2020-2115-DB-HCA/CEQA No.: ENV-2020-2116-CE. We urge the city to find the project Categorical Exempt from the provisions of CEQA and to approve it with the Density Bonus and additional incentives.

The greater Los Angeles region is facing a severe housing shortage, particularly affordable housing. Abundant Housing LA believes that these housing challenges can only be addressed if everyone in the region does their part.

This project is in a walkable neighborhood, close to bus stops and walking and bicycling distance to shopping, restaurants, and schools.

It is great to see the developer using the Density Bonus program to bring new homes, including badly needed affordable housing to the city. Affordable housing programs that depend on a percentage of new construction being affordable need a lot of new construction to have an impact, and the city should work to increase the number of developers using the Density Bonus. This project is a good project for Los Angeles and for the region. Again, we urge the city to approve the Density Bonus and incentives, and find the project Categorical Exempt from the provisions of CEQA.

Best Regards,

Leonora Camner

Leonora Camner
AHLA Executive Director

Jaime Del Rio

Jaime Del Rio
AHLA Field Organizer

Tami Kagan-Abrams

Tami Kagan-Abrams
AHLA Project Director



Planning CPC <cpc@lacity.org>

Item 8 Case No. CPC-2020-2115-DB and ENV-2020-2116-CE, 1848 S. Gramercy Place

Benjamin Steen <ben.d.steen@gmail.com>
To: cpc@lacity.org

Wed, Mar 23, 2022 at 12:48 PM

This proposed building is an insult to those of us who have invested time and money to preserve the historical integrity of our homes in the adjacent Western Heights HPOZ. We all understand the need for higher density housing, but this project is asking for too much while providing very little in return for our community.

I stand with my neighborhood of Western Heights in urging the commission to reject all of the waivers for this project.

Ben Steen
2251 w 20th St



Benjamin Steen
Focus Puller
Camera Operator
IATSE Local 600
818.309.5419

Christine Carlson
Demetrius Pohl

2179 West 20th Street
Los Angeles, CA 90018
Tel: +1 323 735 1027
dpohl@carlsonpohl.com

Los Angeles City Planning Commission

March 23, 2022

Dear Commissioners:

RE: CPC-2020-2115-DB (HCA), 1848 S Gramercy Place

My wife and I live some 600 feet southeast of the proposed seven story residential building and from the upper floors of our 1903 American foursquare transitional craftsman house we have a view north to the Hollywood Hills over single to three story houses. The proposed project would be totally out of scale with surrounding neighborhood in its height, and massing. We are strongly opposed to it and ask you DENY all waivers.

Not only is the project out of scale, the Proposer's application is egregiously deceptive and mendacious, and their request for waivers attempts an end-run around the City's and Planning Department's zoning requirements and building regulations. The zoning of the property is C1.5-1VL-CPIO. The 1VL zoning designation is Height District 1, "very low," i.e., a maximum of three stories, and 45 feet. The Applicant wants to erect a 7-story, 76-foot building, more than 100% out of compliance in terms of the number of stories. This is not a mere "waiver" of a development standard, but a wanton disregard of it.

The Applicant's proposal includes waivers from lot coverage; setbacks; height; transitional height requirements; common open space; required commercial frontage; landscape buffers; and more. The project is not in compliance with either the Mid-City Corridors Recovery Redevelopment Project or the CPIO.

The absolute lack of common open space (private balconies are not common space as the Applicant wants you to believe); the lack of side yard and rear setbacks; the utter disregard of the 40-foot Building Line on the east side of Gramercy Place; and the failure to include any sort of Transitional Height design adjacent to the RD2-zoned, two-story, 1920s fourplex north of the property are all in disregard of applicable City building standards, codes and regulations. A 7-story building at this location would be the only building of that height on Washington Boulevard between Downtown (Figueroa) Los Angeles and Culver City, a distance of 8 miles. The landmark Oddfellows Hall (Casa Vertigo), located at Washington and Oak, is only six stories. Ross Plaza, located on Western at 18th Street, is only five stories. The Applicants did not provide the Citywide Design Compliance form. The project therefore does not demonstrate alignment with the City's Design approach. The project is wildly out of compliance with many of the current planning guidelines, and the Redevelopment Plan guidelines.

The Applicant's waiver requests appear excessive and contrary to the Redevelopment Plan and CPIO. Lot coverage is not 30% but rather 88%. The setbacks are insufficient. A 60% reduction of open space cannot be justified.

The Applicants state the dwelling at 1848 S Gramercy Place is vacant, which is patently not the case; it is being used as low-income supportive housing. Lastly and most significantly, at time of a severe crisis of homelessness, the project will demolish a structure currently being used as low-income supportive housing. There is no guarantee that the residents who will be displaced, will be housed in the three proposed low-income units proposed or elsewhere.

We ask that you deny approval of the eight requested waivers and urge that you reject the Categorical Exemption as a CEQA clearance.

Yours truly,

A handwritten signature in black ink that reads "Christine Carlson". The signature is written in a cursive style with a long, sweeping tail on the "n" of "Carlson".

Christine Carlson

A handwritten signature in blue ink that reads "Demetrius Pohl". The signature is written in a cursive style with a prominent horizontal stroke at the beginning.

Demetrius Pohl

March 22, 2022

To the Los Angeles City Planning Commission

RE: CPC-2020-2115-DB (HCA), 1848 South Gramercy Place (Agenda Item 8, March 24, 2022)

Dear City Planning Commissioners:

I am writing a brief comment about the obvious problematic design issues of this project. I am the broker and owner of City Living Realty. Since the 1980s I have specialized in properties and neighborhoods of architectural and historical interest. I have served on the Los Angeles Conservancy Board of Directors. I have also served on the University Park HPOZ for two decades; I am the current HPOZ Chair. In my professional endeavors, I rely on and have the utmost respect for architects, landscape architects, and other design professionals. And that is why I simply do not understand the reasoning behind the Planning Department Staff's dismissal of the assessments by both the City's Urban Design Studio and the Professional Volunteer Program (PVP), both of which rejected the project (as submitted) as being, it seems, non-compliant with all of the zoning regulations as well as the City's Citywide Design Standards.

Why would Staff go ahead and recommend approval? I ask that you **DO NOT APPROVE** this project.

The summary from the Staff Recommendation Report from the Urban Design Studio and PVP's assessments was buried within the report. So that you can easily read the assessments, I have copied the section here (*my highlights*):

"ISSUES: The following section includes a discussion of issues and considerations related to the project.

Urban Design Studio: The Urban Design Studio reviewed the project on Thursday, August 6, 2020 and received the project **unfavorably** with the following comments:

- The project is **significantly out of scale** with its surroundings.
- The **height creates issues for neighbors in the Character Residential Subarea to the north, blocking sunlight** especially and presenting **a monolithic street wall two stories high**.
- Articulation at the two-story podium is fairly limited due to parking requirements.
- The commercial space and mezzanine is fairly small in terms of square footage, limiting its utility for any future tenants.
- **Very little community benefit** is being provided in exchange for number of waivers of development being requested.

Professional Volunteer Program (PVP): The project was presented to the Professional Volunteer Program on Tuesday, June 15, 2021 and received **unfavorably**. Below is a summary of the comments organized in along areas outlined in the city's Urban Design Guidelines:

- **Pedestrian First Design**

- **The project presents operational issues.** For example the trash and recycling enclosure are too small and not accessible from the retail space and **the retail space is constrained with a difficult to lease layout.**
- Reduce the width of the driveway to the minimum allowed by LADOT.
- Consider ways to embed the stairs to the residential lobby to promote physical activity.
- **Protect and maintain the existing mature street tree.** Reach out to LAUFD to discuss potential options. If the tree needs to be removed you need to replace it in a 2-1 rate.

- **360 Degree Design**

- Provide detailed materials on the elevations.
- The project should **respond to the local area context, the public realm and the relationships with adjacent buildings and should be shaped to consider the quality and functionality of the urban fabric.**
- **Can the parking be placed underground?** If not consider ways to design the podium so it is adaptable to a different use in the future and make sure it is appropriately screened per the Above Ground Parking Advisory. A visible long wall, non-screened openings or metallic louvers overlooking residential windows should be avoided. Consider landscaping and high quality architectural elements that are opaque and add visual interest. Make sure that headlights, structure lights and exhaust gas do not impact the residential adjacent properties.
- Ensure that access and the building entrance is prominent and clearly legible and the lobby is comfortable to use with space for mail boxes.
- Use architectural elements to reduce the perceived mass of the project.
- Make sure that the project complies with the South Los Angeles CPIO District ([Neighborhood-Serving Corridor Sub Area](#)) Development Standards, including building design, articulation and glazing. For example, **a 5-foot landscape buffer, shall be provided between the project and the abutting lot zoned RD2 to the north.** The landscaping should be drought tolerant, evergreen, and capable of growing to a height of 10 feet. If you need additional recommendations, the Urban Design Studio has developed a Native Screening Hedges resource.
- The East and South Elevations need additional work.
- Windows should incorporate well-designed trims and details. Consider adding awnings above the windows at the west elevation to features to reduce heat gain and glare and add visual interest.
- Consider a redesign of the awning above the building's entrance.
- What is the small unidentified space at the back of the project?
- Consider clearstory windows for bathrooms that overlook the exterior corridor with access to natural light.
- Provide an open space diagram and ensure the balcony dimensions comply with the private open space minimum requirements. Can the rooftop used for common open space?
- **Provide more information on the landscaping of the sideyards** and **consider ways to better buffer** from the adjoining properties.

- **Climate Adapted Design**

- G Provide a rooftop plan with any mechanical units and indicate solar on the roof.
- Vines should be placed at the ground and exterior of the building's walls.
- **Indicate required and provided on-site trees.** On site trees need to be 24"-box size or above to count as provided trees and palms are excluded. Trees should be native and provide shade upon maturity.
- Consider native plants that provide year-long habitat.
- Indicate LID compliance.

In response to both the UDS and PVP feedback, the applicant team reiterated the need to maintain the current building design with respect to the Waivers of Development standard requested. The applicant claimed that these waivers are necessary to address several constraints related to the site's base zoning and the CPIO."

I believe that Planning Staff should have taken all of these directives and comments into full account, rather than to simply allow the "applicant team" to say that they have "constraints" due to the zoning. That is what zoning does – it describes the rules and regulations. While it is good that Staff included these summary remarks in the Report, albeit buried within the Report, it seems inappropriate that then Staff recommended approval just because the applicant complains about the zoning. I would ask that the City Planning Commission **REJECT** the Staff recommendation and instead **ADOPT** the recommendations from the Urban Design Studio and the Professional Volunteer Program.

I especially would prefer to see a new concept entirely that retains the 1908 house and builds units in the rear yard.

Thank you very much,

David Raposa

2515 4th Avenue, Los Angeles CA 90018

03/24/2022

Item #8

Case No. CPC-2020-2115-DB

1848 S. Gramercy Pl Los Angeles CA 90019

Dear members of City Planning Commission,

I have studied the project in a great detail.

To be built on a commercial lot, surrounded by commercial-zoned lots and apartment, this is the correct place to maximize the housing units and floor area.

This is also close to the transit point, which is another reason that we should maximize the build capacity of the lot. The project design fully addresses this point of view and, therefore, I fully support this project

Jehu Salazar
Los Angeles, CA



Item 8 Case No. CPC-2020-2115-DB and ENV-2020-2116-CE, 1848 S. Gramercy Place

Natalie Neith <natalieneith@gmail.com>

Wed, Mar 23, 2022 at 12:04 PM

To: cpc@lacity.org, natalie neith <NatalieNeith@gmail.com>

Cc: Alex Jaspersen <jaspy7@gmail.com>, Herman DeBose <hdebose@aol.com>, Gregory Jackson <gregorydjackson2020@gmail.com>, Tony Specchierla <tspeex@mac.com>, Jill & Tony Specchierla <jillandtony@gmail.com>, Douglas Hanson <dmhanson@hansonla.com>, Donna Hanson <donna.hanson@gmail.com>, Bridgette <iambreezey652@aol.com>, Charles Palmer <cpalmer6074@sbcglobal.net>, John Maroney <vtrek9679@aol.com>, Denis Soldatenko <dlspace@gmail.com>, Galen Bean <gbean01@gmail.com>, Nadine Hettle & Eric Aagaard <aagaard@prodigy.net>, Stormie Leoni <stormie.leoni@compass.com>

To the Planning Commission:

I live in the adjacent neighborhood, Western Heights,0 so this proposed structure would effectively be in my backyard.

I have been a realtor in Los Angeles for almost 33 years, primarily specializing in historic properties, and thus would consider it a tragedy to destroy this house-- a piece of our architectural history--which much historic detail (I have been inside.)

I have devoted more than 8 years volunteering as the mayoral appointee to a Historic Preservation Overlay Zone--why do we even bother to give lip service to preserving the fragile history of our city, if we are willing to let it be destroyed by non-conforming projects such as this?

While I certainly support new housing, (I am a realtor , after all), THIS structure (putting it nicely) is NOT the solution.

The staff says the property is vacant--I know it is not. I walk by there on a regular basis and see men coming and going throughout the day.I have grave concerns about displacing this large number of occupants-- (possibly up to 25?) who would then find it difficult to find housing. That is exacerbating our homeless crisis. Our community accepted and supported the recent project --just across the street--that provided senior low income housing-- that was brought before the community for community input and local residents were encouraged to visit projects by the same builders. That has NOT been the case here.

As if that is not enough, it seems the applicant is asking for not just the typical two potentially allowable waivers, but asking for 8 more special exceptions or concessions for a total of 10. Basically it is giving carte blanche to him to build whatever he wants wherever he wants , with rampant disregard for the neighborhood-- which he does not and will not live in. I do not understand how the rest of the city is expected to follow zoning guidelines and all are waived for this project.

I URGE the commission to DENY all of the waivers-- a SEVEN STORY building in the midst of a historic neighborhood?
22 parking spaces --ABOVE GROUND -(how unattractive) for a 33 unit building? It does not even make any attempt to be consistent with anything in the community--or even be attractive or appealing.

Our United Neighborhood Council came out strongly against this-- and you can be sure that the majority of the homeowners in the area would too--but unfortunately there is oftentimes little or no notification of these hearings and the process to learn how to actually be present or express opinions is so unwieldy that many of our resident stakeholders are unaware--or unable to express their opinions.
The last hearing almost made me fear that this project was being rubber stamped through with rampant disregard for any neighborhood input-- and it almost felt like it was a fait accompli!

I hope that this planning commission will do the right thing and listen to those in the community who want to preserve our neighborhood and not allow every developer to propose anything they want and expect to get planning commission support.
This community of West Adams is a treasure and I (we) hope that the planning commission will recognize that!

Natalie Neith
323 595-9414

Natalie Neith
Compass
Realtor, Architectural Director
DRE#: 01045639

www.natalieneith.com
o: 323.595.9414

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3/24/22, 7:57 AM

City of Los Angeles Mail - Item 8 Case No. CPC-2020-2115-DB and ENV-2020-2116-CE, 1848 S. Gramercy Place

No cost, and no obligation.



Planning CPC <cpc@lacity.org>

Item 8 Case No. CPC-2020-2115-DB and ENV-2020-2116-CE, 1848 S. Gramercy Place

Stormie Leoni <stormie.leoni@compass.com>
To: cpc@lacity.org

Wed, Mar 23, 2022 at 12:18 PM

To the planning commission I live close to the project and enjoy viewing the subject property from my window every day as it adds to the historic character of the neighborhood. I'm shocked it's not on Survey LA or protected as it is so obviously a historic contributor.

I can also say that the area on Washington is already too busy. We have excess cars parking on our streets, leaving trash compromising the character of our homes. With such a behemoth of a project, 7 stories (!) and not enough parking spots created this will only get worse. Then to hear the parking would be visible?! That is insane and would really tarnish what makes this community special.

Also there are people living there! We see the building is occupied so what is this that it's vacant? I am strongly against this and it would be an example of corruption if it snuck through - 7 stories?! It's ridiculous. Please understand how horrible this would be for the people living in the building and for the neighborhood. This is NOT the right project for this location. I strongly strongly oppose it.

--
Stormie Leoni
Top 1.5% of Agents in the US
DRE#: 01949760
m: 310.227.5996



--
Stormie Leoni
Top 1.5% of Agents in the US
DRE#: 01949760
m: 310.227.5996





Department of City Planning

City Hall, 200 N. Spring Street, Room 272, Los Angeles, CA 90012

March 24, 2022

TO: City Planning Commission

FROM: Sergio Ibarra, City Planner

ADDITIONAL INFORMATION/TECHNICAL MODIFICATION TO THE STAFF RECOMMENDATION REPORT FOR CASE NO. CPC-2020-2115-DB-HCA; 1848 SOUTH GRAMERCY PLACE

The following technical modifications are to be incorporated into the staff recommendation report to be considered at the City Planning Commission meeting of March 24th, 2022, related to Item No. 8 on the meeting agenda.

The following condition of approval No.7 has been revised to reflect the correct section of the LAMC as it relates to commercial parking requirements within an Enterprise Zone and within a Major Transit Stop.

- 7. Automobile Parking for Commercial Uses.** The project shall provide a minimum of one (1) parking space, as shown in Exhibit A; ~~per AB 2345~~. as the Property is located within an Enterprise Zone, commercial parking is required at 2 parking spaces per 1,000 SF, consistent with LAMC Section 12.21 A.4.(x)(3)6.

GENERAL INFORMATION ABOUT THE CONTENTS OF THIS FILE

Submissions by the public in compliance with the Commission Rules and Operating Procedures (ROPs), Rule 4.3, are distributed to the Commission and uploaded online. Please note that “compliance” means that the submission complies with deadline, delivery method (hard copy and/or electronic) AND the number of copies. Please review the Commission ROPs to ensure that you meet the submission requirements. The ROPs can be accessed at <http://planning.lacity.org>, by selecting “Commissions & Hearings” and selecting the specific Commission.

All compliant submissions may be accessed as follows:

- **“Initial Submissions”**: Compliant submissions received no later than by end of day Monday of the week prior to the meeting, which are not integrated by reference or exhibit in the Staff Report, will be appended at the end of the Staff Report. The Staff Report is linked to the case number on the specific meeting agenda.
- **“Secondary Submissions”**: Submissions received after the Initial Submission deadline up to 48-hours prior to the Commission meeting are contained in this file and bookmarked by the case number.
- **“Day of Hearing Submissions”**: Submissions after the Secondary Submission deadline up to and including the day of the Commission meeting will be uploaded to this file within two business days after the Commission meeting.

Material which does not comply with the submission rules is not distributed to the Commission.

ENABLE BOOKMARS ONLINE:

**If you are using Explorer, you need will need to enable the Acrobat  toolbar to see the bookmarks on the left side of the screen.

If you are using Chrome, the bookmarks are on the upper right-side of the screen. If you do not want to use the bookmarks, simply scroll through the file.

If you have any questions, please contact the Commission Office at (213) 978-1300.

SECONDARY SUBMISSIONS

Law Offices of Grace E. Yoo

March 21, 2022

City Planning Commission
CPC Hearing Officer
VIA EMAIL: Sergio.ibarra@lacity.org
Rafael.fontes@lacity.org
cpc@lacity.org

Re: 1848 S. Gramercy PI - CPC-2020-2115-DB (HCA)

Dear Honorable Commissioners and City Planning Staff:

My name is Grace Yoo, and I am a resident of Angelus Vista, literally one block from the property in question. Back in August 2021, several of my neighbors and I objected to the lack of proper notice and procedural defects concerning the project, on top of the misrepresentation of the facts of this matter.

Since August 2021, there have been additional irregularities concerning procedure and lack of information that should have been provided to the Commissioners, not sure if it is merely an oversight or for egregious reasons. The City Planning staff has inadvertently left out letters that were timely submitted, and prevented the Commissioners to review all materials to make an informed decision, and distorted the realities of this project.

Please understand that I am in favor of affordable housing and Very Low Income housing, which has literally been built next door to my house and opened in 2021. The building next door known as the Gramercy Place Apartments is four stories high and abuts Washington Blvd to the south, Wilton Place to the West and Gramercy Place to the East. My house is on one half of the northern boundary for the Gramercy Place Apartments. My family and neighbors endured the constant construction noise and pollution because we knew it was to help the lives of Angelenos.

I am attempting to keep this letter short, as it is one of many that is being submitted for your consideration on reviewing this project. My request is that you have the City Planning Department staff submit to you a packet of information that is free from internal inconsistencies. Perhaps it is because the City staff is overwhelmed with not enough staff to help with all the reviews, however, as this is a very serious diversion of what is allowable, I would request that the Commissioners require the information that you are presented to be re-evaluated with all relevant information at hand before the City's Planning department, so that the person(s) involved can write as accurate of a project analysis as possible.

I am aware of City Staff, not necessarily the person(s) working on this packet, have been known to make decisions without actually having visited the site and checking thoroughly.

I find disingenuous the conclusion that this project with three (3) Very Low Income units is somehow providing a service to my neighbors and the Angelus Vista neighborhood, when this

project displaces nearly two dozen people of Very Low Income rents from the property to provide 30 at market rate units.

The livability of the neighborhood does not increase with the many many variances requested, but rather diminishes the quality of life for the neighbors with blocking of the sun and not to mention, issues for the new residents to live at this property. Urban Design even states that there is "very little community benefit is being provided in exchange for the number of waivers of development being requested." The summarily killing of good mature trees is also another consideration that is not being factored into the balance. Replacing mature trees with seedlings, even at a 2-1 rate is a hollow attempt to show concern when the mature trees can be saved.

Additionally, the lack of trash and recycling space is a problem mentioned by Pedestrian First Design. And reducing the driveway to not be in compliance with LADOT requirements is a waiver that should not be allowed. There are too many variances for setbacks and height requirements that are not consistent with The South Los Angeles CPIO District that it just does not make sense for the City to grant all the variance requests as the balance of benefits is completely lopsided in favor of the developer against the neighbors.

The applicant should be applying for a zone variance for the many many variances that are being requested but as a Variance application requires findings to justify the variance, the applicant is attempting to get the waivers without justification.

It is my sincere hope that the City Planning Commissioners will do a more thorough vetting of this particular project as too many irregularities and inconsistencies exist at this point of the development plan.

Sincerely,



Grace Yoo, Esq
Co-Founder Environmental Justice Collaborative

PRESERVATION VIDEO

HISTORIC PRESERVATION: RESEARCH / CONSULTING / ADVOCACY

March 21, 2022

Los Angeles City Planning Commission
RE: CPC-2020-2115-DB-HCA, 1848 S. Gramercy Place

Dear Commissioners:

My name is Jim Childs. I am very familiar with the former Community Redevelopment Agency (CRA) and its redevelopment plans, which are under state law a special kind of specific plan overlay district. I served as an elected community member of the CRA/LA Project Advisory Committee (PAC) for the Adams-Normandie 4321 Project Area located in the West Adams' University Park Neighborhoods.

For 12 years I was the Chair of the PAC's Housing and Planning Committee. Our committee reviewed ALL external development permits for projects located in the Project Area that required CRA staff sign-offs. Our reviews included compatibility issues with the Secretary of the Interior's Standards and Guidelines for historic properties and compliance with the California Environmental Quality Act. The requirements for an CRA approval were often disparate from those of normal LA City code standards. Simply put, the CRA' redevelopment goals for the community were to encourage projects that supported the economic growth of the community while not sacrificing the historic-cultural integrity of the community

I am writing today about a proposed project at 1848 South Gramercy Place. Even though the current building itself is a 110-year-old residence that was, obviously, in a residential zone and neighborhood for most of its lifetime, at some point in recent decades it was rezoned to commercial manufacturing and then, more recently, to C1.5-CPIO. Then, thirty years ago, in the wake of the 1992 Civil Unrest, the City Council voted to adopt the Mid-City Recovery Redevelopment Plan, including 1848 S. Gramercy Place within that boundary.

Unfortunately, the proposed project does not appear to be at all compliant or conforming with the requirements of the redevelopment plan. Indeed, there has been **no effort made to try to comply**, nor to – as the Redevelopment Referral application form indicates they must – “**show compliance.**”

As you are aware, the CRA was basically dissolved about a decade ago. But its redevelopment plans – which are best described as a land use specific plan adopted by the Los Angeles City Council – live on. This includes the Mid-City Recovery Redevelopment Plan.

The Mid-City Recovery Redevelopment Plan includes specific policies, goals and requirements – including the broad rule regulation (common to all redevelopment plans) that allowing residential uses in a commercial zone is itself a discretionary action subject to both “rules” and actual decision-making. In addition, and this is also a broad, citywide regulation, when two or more incentives are requested for a Mixed-Use project, the lead agency or decision maker “shall find that the project provides for an arrangement of uses, Buildings, Structures, open spaces and other improvements that are compatible with the scale and character of the adjacent properties and surrounding neighborhood.”

This is just one example of missing evaluations and findings for this project.

I would like to go through point by point both the transfer of the authority from the CRA to City Planning to administer the City’s redevelopment plans, and then the actual Mid-City Recovery Redevelopment plan.

The stated purpose of the transfer of authority was not to undo the CRA regulations but, rather, to ensure their continued implementation. Page 5 of the pertinent Staff Report (dated May 8, 2014) to the City Planning Commission and City Council states: *“The Department of City Planning would serve as the responsible agency for the continued implementation of the existing 21 active Redevelopment Plans, the latest of which expire in 2033.”*

It goes on to point out that doing so provides a continuity to “vulnerable communities” including our own: *“Each of the redevelopment plans have been adopted by the City and found by both the City Planning Commission and the City Council to be consistent with the City’s General Plan. Further, consolidating the land use controls in the redevelopment plans to the City Planning Department is critical to ensure that the goals of the General Plan are met by **maintaining important land use provisions in some of the City’s most vulnerable communities and that the City retains local control over land use policy.**”*

Further: *“DCP develops and administers overlay zones and specific plans that have provided more tailored land-use requirements for many of Los Angeles’ unique neighborhoods. **Similarly, most of the 21 active Redevelopment Plans have tailored requirements that specify permits cannot be issued without some level of signoff ensuring that development proposals are consistent with the governing Redevelopment Plans. Redevelopment Plans and land use review provide important protections for neighborhoods in regards to development scale, use, density, intensity, parking, design, and historic preservation. These land use tools provide standards for development in many of the City’s most economically disadvantaged neighborhoods.**”*

Also noted is that: *“Redevelopment land use approvals are therefore essential to allow property owners and applicants to utilize their full development rights, as well as to ensure community protection through careful review of design, signage, use restrictions, historic preservation and other local priorities in some of the City’s most sensitive and economically disadvantaged*

*communities.” For example, in South Los Angeles, which the Mid-City Recovery Redevelopment Plan is a part of, “South Los Angeles’ commercial corridors have land use controls regulating auto related uses, **design review of new construction**, and preserving employment land uses.”*

Importantly, “The transition of land use authority from the former CRA/LA to the City Planning Department makes certain that the Redevelopment Plans, which serve as legal expressions of public policy adopted by the City Council, will continue to be implemented to ensure continued community protection in the redevelopment plan areas.... All stakeholders that are impacted by development and uses in redevelopment project areas stand to benefit. The proposal does not change the intent or function of the regulations in the Redevelopment Plans; however, it does provide certainty to the development community and neighborhoods that land use rights and controls in redevelopment project areas will continue to be enforced in a clear and consistent manner.”

The City Planning Commission, in adopting the resolution approving the transfer of authority, included this language: *“WHEREAS, transitioning the land use controls in the redevelopment plans to the City is critical to: 1) ensure continuity and certainty for the development community; 2) ensure that the City’s economic development goals are achieved; 3) maintain important land use protections in some of the City’s most vulnerable communities; and 4) retain local control over land use policy.”*

Despite all of this broad language, the statements of policy regarding protecting vulnerable communities and ensuring continuation of the redevelopment plans, and the specific adoption of changes to the LAMC to assure that this is implemented – despite this, for this project in particular there has been basically zero attention paid to any of this OR to the actual Mid-City Recovery Redevelopment Plan itself.

The Project Objectives of the redevelopment plan (page 2, Sec. 105.5) include “architectural and urban design standards including standards for: height, building setback, continuity of street façade; building materials; compatibility of new construction with existing structures, and concealment of mechanical appurtenances.”

The proposed project does not conform to height (although we all recognize there are some exceptions under the Housing Crisis Act, the requested waiver from 3 stories to 7 stories, and from 45 feet to 75 feet, is excessive and is not in conformance with the redevelopment plan); OR building setback (requested waiver to zero feet on the frontage in lieu of 10 feet or more); continuity of street façade (the street façade is set back 40 feet).

Project Objective 105.16 (page 4) underscores the purpose of this redevelopment plan to be an economic catalyst in the wake of the Civil Unrest: “Promote a thriving commercial environment which will contribute to the economic well-being of the Project Area.”

The proposed project is asking for relief from that redevelopment objective by asking for two waivers from the zoning (CPIO) requirements: one, to reduce the height of the first-floor commercial component from 14 feet to 10 feet; and two, to reduce the frontage from the minimum required identified as a “bakery.” I do not see how this minimum space allotment could possibly lead to a contribution to the economic well-being of the community, a redevelopment plan objective.

In the redevelopment plan’s Land Use section, it acknowledges that areas shown on the map as Commercial shall be developed with commercial uses “consistent with the applicable Community Plans,” as they may be amended from time to time. (page 15, Section 503.1) The Community Plan designation for this location was amended to C1.5-1VL-CPIO. The “CPIO” is a zoning designation and not just a theoretical set of regulations and standards; in other words, it is the new zoning that new commercial (or in this case, mixed use) developments shall be consistent with, in order to be in compliance with the redevelopment plan.

With all the waiver requests to not follow the CPIO regulations, this proposed project does not show compliance with the Mid-City Recovery Redevelopment Plan.

Additionally, Section 503.5 (page 16), which describes residential uses in a commercial zone, states specifically that “The Agency may permit appropriately designed...residential and mixed-use development within commercial.”

So we are back to the phrase “appropriately designed” and the nuance of meaning where the Agency (now the Planning Department and the City) “may” permit. This is a discretionary action on the part of the decision-maker and must be based on whether or not a project meets appropriate design standards.

One standard this redevelopment plan includes is FAR, which is at a maximum of 3:1. The CPIO maxes out at 1.5:1. The Applicant is requesting 5.1:1 – 3.4 times as dense as the CPIO maximum.

This proposed project also requests waivers from, essentially, all setback requirements on all four sides. These are the required setbacks in the C1.5-1VL-CPIO zone. However, the redevelopment plan (Section 515) actually goes a bit further, granting the decision maker to “establish setback requirements for new development within the Project Area which may exceed the requirements of the City’s zoning ordinance.” This is because a major part of the former CRA’s responsibility was to ensure a good quality of life (not just aesthetics), especially for discretionary approvals.

Section 516 (page 19) specifically excludes the approval of “Incompatible Uses.” “No use or structure, which by reason of appearance...or similar factors that would be incompatible with the surrounding areas or structures, shall be permitted in any part of the Project Area.”

I believe that is a pretty clear statement – **nothing incompatible shall be permitted.**

On page 20 of the redevelopment plan, it notes (518.2) that no variation from the redevelopment plan except one that is a minor variation or minor departure from the plan except under “exceptional circumstances or conditions.” There is nothing exceptional about the parcel of this proposed project in Angelus Vista; indeed several other developers are now in the process of constructing multi-family projects on similarly sized lots without asking for all of the waivers that this applicant requests. The redevelopment plan states, “No variation shall be granted which changes a basic land use or which permits other than a minor departure...” But in essence, the Applicant is asking for so many waivers as to make the C1.5-1VL-CPIO zoning changed, e.g., it changes the basic land use.

On the same page, Section 520, Design Guidelines, the requirement is that applicable design guidelines shall be utilized. At this writing, the applicable design guidelines would be a combination of the CPIO and the citywide guidelines, and they shall be used. Moreover, the specific language of the redevelopment plan is: “...the Agency [City] is authorized to establish heights of buildings, land coverage, setback requirements, design criteria, traffic circulation, traffic access, and other development and design controls necessary for the proper development of both private and public areas within the Project Area....One of the objectives of this Plan is to create an attractive and pleasant environment in the Project Area. Therefore, such plans shall give consideration to good design, open place and other amenities to enhance the aesthetic quality of the Project Area. The Agency shall not approve any plans that do not comply with this Plan.”

If the Agency could not (shall not) approve any such plans, nor should the Planning Department, or the City Planning Commission.

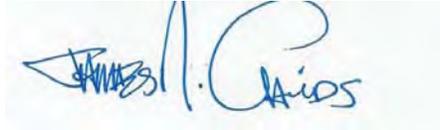
I would like to reiterate that the Planning Department and this Commission is charged with implementing the Mid-City Recovery Redevelopment Plan. So far, both Planning Staff and the Applicant have instead ignored it, avoided it, and failed to actually implement it.

I ask that the Commission therefore *deny all of the proposed project’s requested waivers*, all of which are not in compliance with the redevelopment plan (not to mention the CPIO nor any sensible urban planning standards).

Last but certainly not least, one of the most important policies in this and any redevelopment plan is to help ensure that individuals not be displaced and do remain housed. But (despite reports to the contrary) the Applicant is a housing provider (having become so by dint of acquiring this property, which has served as supportive housing for nearly two decades for more than twenty occupants, in a group/dormitory setting). The Applicant has stated repeatedly that this is a single-family home, and apparently now has told staff it is vacant. That is not true. I will let others describe the situation more fully but given that I am writing about the City’s redevelopment plans, I do want to note that any project that results in displacement

without mitigations (relocation, assurances that homelessness will not result) is not compliant with the redevelopment plan.

Thank you,

A handwritten signature in blue ink on a light blue background. The signature is stylized and appears to read "Jim Childs".

Jim Childs
Preservation Video
2326 Scarff Street, LA, CA 90007
Jeanjim2341@att.net
213 747 2526



Jean Frost
2341 Scarff Street
Los Angeles, CA 90007

March 21, 2022

Los Angeles City Planning Commission
RE: CPC-2020-2115-DB-HCA, 1848 S. Gramercy Place

Dear Commissioners:

I am dismayed to learn that my colleague Laura Meyers' very thorough August 23, 2021 comment letter was not included in the Staff Recommendation Report that has been distributed to you and to the public. This overt omission could be construed as an appearance of bias. I attended the August hearing and so much of the record would justify a conclusion and recommendation other than the current staff report before you.

Ms. Meyers had submitted her comments in advance of the August public hearing; receipt of her email with this letter attached was confirmed by the Mayor's deputy as well as the Council District 10 Planning Deputy (and several neighbors, plus I was also copied on her email and received the letter). It is clear from the group of downloaded documents that resulted from Laura's Public Records Act (PRA) Request last August that staff had also received her email with the comment letter attached, because that email from Laura was included in the PRA materials.

It makes all of us wonder if there are other letters received by staff that were not included in Staff's report to the Commission?

Below this introduction I am therefore (in smaller type, to fit the CPA requirements/limits) incorporating Laura's previous email into this comment letter (*see full text below*).

I would also like to express concern regarding the Staff Report's reference to 15 speakers at the public hearing, but without including any real specifics and just a two-sentence summary of the comments. The usual procedure, including recent ZA reports by way of example, would have staff include a discussion of the comments made and then perhaps staff's rebuttal to same, but that is the only way the Commissioners would know the content of the public hearing. This should be a transparent process. Instead, it looks like a biased process designed to diminish community input and expressions of concern, opinion and, yes, facts, all in order to reach a preconceived, foregone conclusion. I was present at the (virtual) hearing and I can tell you that a great deal of relevant and important information was communicated to Staff. Moreover, the Council District 10 representative's comments regarding concerns have also not been addressed in the Staff Report.

I hope you will take the time to read Laura's original letter below. She has asked staff to also submit it, but as of close of business on Friday had not received a response.

Thank you for your consideration,

Jean Frost
indiejean@att.net

LAURA MEYERS

1818 South Gramercy Place • Los Angeles, CA 90019
Tel: 323-868-0854 • Fax: 323-730-0432 • E-mail: lauramink@aol.com

August 23, 2021

City Planning Commission
CPC Hearing Officer
200 North Spring Street, Room 721
Los Angeles, CA 90012

Via email: sergio.ibarra@lacity.org
Rafael.fontes@lacity.org
cpc@lacity.org

RE: CPC-2020-2115-DB (HCA)

Dear Honorable Commissioners and City Planning Staff:

I am writing to express my very strong, personal concerns about this proposed project. As proposed, it is objectively completely out of compliance with the City's adopted regulations, the zoning for the parcel, the two specific plans that overlay the zoning, the neighborhood character, and, importantly, it is out of compliance all policies designed to prevent displacement of low-income persons.

No reasonable person would consider a dozen requests for "waivers" from the requirements of the zoning and the parcel's overlays/specific plans as inconsequential. These requested waivers – which are not all properly stated in the Hearing Notice – include waivers from lot coverage; setbacks; height; transitional height requirements; common open space (stated as a requested waiver to 1,500 feet in lieu of 3,700 feet, however that is not true because the 1,500 square feet is comprised of private balcony space – not common open space); FAR; required commercial frontage; landscape buffers; and more. What is not included in the Hearing Notice as a subject matter is the project's compliance (or, rather, lack thereof) with either the Mid-City Corridors Recovery Redevelopment Project OR the CPIO. (The case should have been filed as a Multiple Approvals Case, but appears not to have been).

Indeed, it would seem that in practical fact the Applicant is requesting a Zone Variance but is attempting to utilize waiver requests to avoid filing a Variance application or making the required Findings to support that request.

I support increased housing production, but not at the expense of all reasonable adopted standards. I especially do not support a project that will increase displacement rather than solve our increasing problem of unhoused individuals.

I will try to summarize my concerns in this letter in advance of today's hearing, but reserve the right to submit further comments after the case is presented and others may have also testified.

Zoning Conflicts:

The zoning is C1.5-1VL-CPIO. The 1VL zoning designation is Height District 1, "very low." Very low means a maximum of three stories, and 45 feet. The Applicant desires to build a 7-story, 76-foot building, more than 100% out of compliance in terms of the number of stories, and represents an approximate 69% increase in height as measured in feet. This is not a mere "waiver" of a development standard.

Too, in the adopted CPIO ordinance, it is stated explicitly that the CPIO itself shall govern any conflicts between height and/or transitional height requirements in any other portion of the LAMC. The matter before the City Planning Commission hearing officer appears to not include an application for an "Exception" (or other variation) to the CPIO. Noting also, to gain a CPIO Exception, the Director of Planning shall make a Finding that the project substantially complies the CPIO's design guidelines or other applicable design guidelines (this will be discussed further, below).

The CPIO designation is an overlay or Specific Plan that changes certain general requirements of the C1.5 zone to requirements that are more particular and exacting to “Subarea A, Neighborhood Serving Corridor.” This Subarea does allow for more multi-family housing, along with "a refined range of commercial uses that serve the needs of the surrounding neighborhood. Development standards promote neighborhood activity and facilitate a more pedestrian-oriented environment."

However, this project offers zero pedestrian amenities, and does not promote neighborhood activity.

For clarity and to give current staff some historical background they may not be aware of, the Community proposed and presented supporting materials for a Washington Boulevard Specific Plan (from Normandie to Crenshaw) almost two decades ago, in 2004. There were a series of approximately three dozen community meetings over several years with business owners, homeowners associations, two neighborhood councils, the Community Redevelopment Agency, and the Planning Department throughout the process. This process led to both mapping and a written proposed Specific Plan based on the Colorado Boulevard Specific Plan, the CRA/City Council-adopted Urban Design Guidelines for Adams-Normandie 4321 (University Park) and the comments received in the series of community meetings.

Faisal Roble, currently the City Planning Department’s Chief Equity Officer, led the Planning Department team that was evaluating the Washington Boulevard Specific Plan proposal. In the end (the “end” was years in the making) Mr. Roble informed the Community that the new CPIO for Washington Boulevard would adopt the Specific Plan’s proposed development requirements, and that the CPIO would be utilized as a Specific Plan.

The reason for this long discourse is, quite simply put: If Planning Staff informs and confirms with the Community that it achieved its goal of having specific plan requirements adopted, *and Planning Staff did do that*, then it is completely improper to even consider dispensing with those requirements at the first opportunity. How does a citizenry trust its government when what is said (and adopted) can be so easily ignored? How is this equitable in a diverse BIPOC community where the evidence of prior racist zoning within this community/neighborhood is evident in the very history of zoning on this particular parcel?

Design

There is nothing in the renderings included in the initial Application packet in February 2020 (the only architectural/design information available to me; the current renderings are not online in the City Planning Department’s Case Summaries section) that would indicate that any thought was given to the requirement of neighborhood compatibility (per the CPIO) nor the Redevelopment Plan’s requirements and policies related to “architectural and urban design standards including standards for: height, building setback, continuity of street façade; building materials; [and] compatibility of new construction with existing structures....”

Moreover, Staff may not be aware that within this (and most) Redevelopment Plans, the approval of a project that does not fully comport with the underlying zoning is itself a discretionary action. In other words, approving residential uses in a commercial zone is possible, but discretionary (see **503.5** of the Redevelopment Plan: The Agency may permit appropriately designed and properly located Residential and mixed use development within Commercial... areas....”). So a project to be approved must also meet certain design standards. Now that the CRA’s jurisdictional authority has transferred, the “Agency” is now Planning Staff, the Director of Planning and/or the City Planning Commission. At **515** of the Plan, it is also stated that the decision maker may establish setbacks in excess of the zoning requirements (see discussion about the 40-foot Building Line below).

No project may be approved that is “incompatible” for a number of reasons, including “by reason of appearance” (**516**). For land use entitlements (**521**), none *shall* be issued “unless and until” the project is “determined to be in conformance with this Plan and any applicable design guidelines.” Those Design Guidelines (**520**) include an analysis of land/lot coverage, setbacks, design criteria, and height. “One of the objectives of this Plan is to create an attractive and pleasant environment in the Project Area. Therefore, such [project/improvement] plans *shall* give consideration to good design, open space and other amenities to enhance the aesthetic quality of the Project Area. The Agency *shall* not approve any plans that do not comply with this Plan.”

For the review and approval of discretionary requests within the CPIO, the decision makers should make Findings “related to neighborhood compatibility, the degradation or benefit of the Project to surrounding properties and the community, and conformity with the intent and purpose of the Community Plan.”

I recognize that objective standards are required in these evaluations, but objectively the absolute lack of common open space; the lack of side yard and rear setbacks; the utter disregard of the 40-foot Building Line on the east side of Gramercy Place, technically the *prevailing setback* which is also the actual setback for all properties without exception located between Venice and Washington on the east side of South Gramercy Place (1600-1848 S. Gramercy Place); and the failure to include any sort of Transitional Height design adjacent to the RD2-zoned, two-story, 1920s fourplex north of the property are all objective standards that are being dispensed with in the proposal.

Objectively, a 7-story building at this location would be the only building of that height on Washington Boulevard between Downtown (Figueroa) Los Angeles and Culver City, a many-miles stretch of road. The landmark Oddfellows Hall (Casa Vertigo), located at Washington and Oak, is only six stories. Ross Plaza, located on Western at 18th Street, is only five stories. This project’s uninspired, block-like masonry design is not iconic (I hesitate to evaluate it further on architectural merits), but would dominate the Washington Boulevard corridor.

The **Citywide Design Compliance form** was not included in the package nor is it online. The project therefore does not demonstrate alignment with the City’s Design approach. The project is out of compliance with many of the current guidelines, as well as the narrative guidelines in the prior iteration AND the Redevelopment Plan guidelines.

In cases where the Citywide Design Guidelines conflict with a provision in a Community Plan’s Urban Design chapter, specific plan, overlays, or other local design guidelines the community specific requirement shall prevail. Applications that do not substantially conform to specific guidelines should provide rationale for an alternative design approach.

Here’s my attempt to drill down to the Citywide Guidelines for this project:

Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.

RESPONSE: A 7-story building with a 0-foot setback does not maintain human scale and the design does not actively engage with the street nor create a public space.

Guideline 4: Organize and shape projects to recognize and respect surrounding context.

RESPONSE: This project design does not respect the surrounding context.

Guideline 5: Express a clear and coherent architectural idea

The design of the site and the building should have a comprehensive concept experienced through scale, proportion, enclosure, and compositional clarity

Building Design

- *Shape building design to respond to the setbacks, fenestration patterns and important horizontal datums of adjacent structures.*
- *Select materials and develop façade details that consider the views of the building from all sides*

RESPONSE: This project does not respond in any way to adjacent structures. Its scale and proportion is not compatible with anything in the neighborhood or along the Washington Boulevard Streetcar Commercial Corridor, which dates to the 1920s. The materials do not align with anything nearby. The Applicant does not seem to have considered the views of the building from all sides.

Guideline 6: Provide amenities that support community building and provide an inviting, comfortable user experience.

Design to create livable places and desirable environments where people want to spend time engaging in social, civic, and recreational activities. Projects that encourage connections with a variety of transit modes and enhance their immediate environment with amenities are highly encouraged.

For buildings with six units or more, cluster code-required common open space areas in a central location, rather than dispersing smaller less usable areas throughout the site.

RESPONSE: There is no common open space. There are no pedestrian amenities. This is not a project that encourages connections with a variety of transit modes.

Objective 1: Consider neighborhood Context & Linkages in Building and Site Design

1.1 Site Planning

>> ... where additional setback is necessary or a prevailing setback exists, activates the area with a courtyard or “outdoor room” adjacent to the street by incorporating residential amenities such as seating or water features, for example

>> Locates a majority of code-required open space at the ground level in a manner that is equally accessible to all residential units to promote safety and the use of outdoor space. [podiums may be used.]

1.2 Building Orientation

>> Locate gathering spaces such as gyms....at the ground level and accessible to the street

1.3 Entrances

>> Maintain an active street presence for ground floor retail establishments in mixed use projects by incorporating at least one usable street-facing entrance with doors unlocked during regular business hours

>> In mixed use projects, ensure that ground floor uses maintain a high degree of transparency and maximize a visual connection to the street by providing clear and unobstructed windows, free of reflective glass coatings....

1.4 Relationship to Adjacent Buildings

>> Ensure that new buildings are compatible in scale, massing, style, and/architectural materials with existing structures in the surrounding neighborhood. In older neighborhoods, new developments should likewise respect the character of existing buildings with regards to height, scale, style and architectural materials

RESPONSE: The project violates each of these Bullet points.

Issues with Submitted Plans:

There are conflicts between the submitted plans (even internally, comparing the landscape plans to the primary plans) and the other Application materials.

For example:

1). The amount of square footage for the commercial portion varies on different pages and in different forms, ranging from 204.4 square feet to 260 square feet to 360 square feet. What is the correct number? [The space is clearly very small, compared to the total 28,000 square feet for the project. Noting again that this proposed project is within the Mid-City Recovery Redevelopment Plan, in a commercial zone.]

2). One of the entitlement requests is for a 0-foot setback on the south side of the project. But on the plans page L3, it shows “perm pavers or permeable concrete walk” and a sweet bay laurel hedge in that same location (at the first floor level)

3). There is also conflict in the stated FAR numbers. On the Application, the request is for an FAR of 3.4:1 in lieu of 1.5:1. Elsewhere in the submitted materials 3.25:1 is mentioned. But on the Hearing Notice it states 5.1:1. Which figure (request for incentive, in this case) is correct?

The Setback (or lack thereof):

To place this commentary into the record (although it has been in several emails sent by me and, to-date, unanswered by the Planning Department), the east side of Gramercy Place between Washington Boulevard and Venice Boulevard (1600-1800 blocks) has a 40-foot Building Line.

The 40-foot setback was originally established on the deeds circa 1903. In 1919, the California Supreme Court (in the landmark case, *Fritz Werner v. Mary M. Graham, et al*) determined that conditions set forth on deeds are not enforceable. This had many implications throughout Los Angeles and the state, but for this section of South Gramercy Place the simple result appears to be that the City Council, 100 years ago, adopted **by ordinance** the enforceable 40-foot Building Line.

That building line designation was not only on ZIMAS, it also appeared as an attachment in the first application by this self-same Applicant for his TOC case. (2018 ZIMAS report attached, see page 2 near the top of the page).

To be clear, every single property on the east side of Gramercy is built behind and respects the 40-foot setback building line, including the adjacent liquor store facing Washington Boulevard.

Subsequently at an unknown date with no notice to the property owners on the east side of Gramercy, the 40-foot Building Line was removed from this parcel (as well as the parcel to the south), thus showing a termination of the Building Line at 1844 S. Gramercy. I see no City Council action in the Clerk's online file management system, and of course none of us were notified that such an action was pending (if an action was pending). Did a voted-upon action to amend the original ordinance happen? If yes, I would like a copy. If not, WHO changed the ZIMAS record?

A Building Line is not a “development standard” for which a waiver should be given. And, as detailed above, for a project to be compatible in situ at this location, it should not jut 40 feet forward beyond the properties both to its north and south.

Environmental and CEQA Concerns:

I will be brief.

The residence was not declared a City of Los Angeles Historic Cultural Monument (HCM) in 2018. There were several legal and political issues that swirled around the situation, but that would not be pertinent to CEQA. What is pertinent are two facts:

- 1). As a part of his response to the HCM nomination, the owner/Applicant for this project had hired several representatives who in turned submitted a false document purporting that this property had been evaluated and rejected as a Contributor to the National Register. It turned out that the evaluation had been for a property in Hollywood located at 1848 North Gramercy Place. Unfortunately, that document was not removed from the file; and it was not made clear that it was an incorrect assessment. It may not have made a difference, but the situation does demonstrate the lack of rigor in the 2018 evaluation by Planning (OHR) staff.
- 2). Conversely, Planning Staff is well aware that its own 1996 Historic Resources Survey for this Community – prepared by a well-known Historic Consultant firm – identified as a potential historic district the “18th Street Neighborhood,” which basically comprises the Angelus Vista tracts. That survey did not differentiate between properties zoned residential and properties zoned industrial (unlike the later South Los Angeles SurveyLA, which excluded properties – like 1848 S. Gramercy – which were zoned commercial manufacturing at the time). And, 1848 S. Gramercy Place was identified as a Contributor to that District. Staff is aware of this and has had the paperwork for some time. The bulk of the identified properties now sit within the new Angelus Vista Character Residential Overlay District CPIO – a so-called “HPOZ Lite” district – but because 1848 S. Gramercy Place sits within the commercial zoning, it was excluded from the protections of the Character Residential District. That does not exclude its proposed demolition from CEQA consideration, and indeed the Redevelopment Plan does require a further evaluation as well. (One component of the Redevelopment Plan is historic preservation – see Objective 7 and other references).
- 3). Then there is the matter of the two-level, above-ground parking structure. As proposed, it would have a mere 5-foot setback from the small apartment building to the north. That building, in turn, is set back only five feet from the

property line – so ten feet total separation, for the residents, from the fumes vented (through the grilles showing on the renderings) by the cars in this parking garage. A mitigation (assuming staff is inclined to approve the requested reduction of side yard setback) is readily available: put the parking underground. That, of course, would also reduce the height. But for this comment, I am addressing the environmental concern/CEQA.

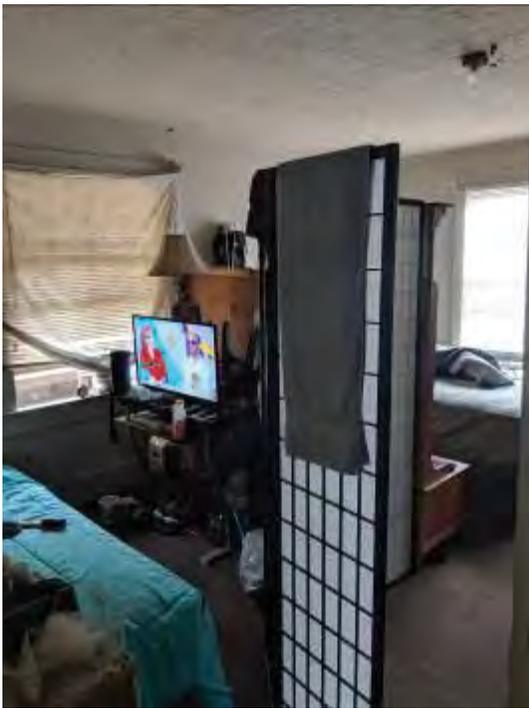
Displacement:

How long can the Department pretend that this project would NOT displace 20-25 individuals from their longtime supportive housing?

As you are aware, I was engaged by (the former) Council District 10 staff to represent the City in its above-referenced application for Historic Cultural Monument status for this property. I do want to remind you that in addition to myself, many city family members toured this house and took official photos of its interior. Present on the tour were OHR staff members; two Cultural Heritage Commissioners; CD10's field deputy (prior) for the area; several city interns; Applicant and Applicant's representatives; and maybe others. City staff and I all took photos; this documentation is part of the City's records. There are many photographs available to you that show occupied "dormitory" rooms with multiple beds and dressers. On the first floor, the dining room, the large rear addition, and perhaps one other room were all in use as dormitory-style bedrooms or units. On the second floor, all four bedrooms were similarly set up. In addition, while we were not able to take photos in the third-floor attic space, there appeared to be a similar set-up.

I am inserting several (albeit random) photos of the dorm rooms at 1848 S. Gramercy Place from that site visit that were taken by staff (not me) and which are a part of the public file.







I want to emphasize that while these are random photos, and there are more, it is clearly evident in the pictures that the residence is used for multiple persons.

As of today, Monday, August 23, 2021, we (the neighbors) still do not know of the gentlemen who reside at the property are even aware of this project. The property was not posted for the public hearing.

A few “clean up” items. First, I am writing this letter as an individual, and not on behalf of any organization I may be associated with.

Second, I am happy to provide Planning Staff with a copy of the Redevelopment Plan, or a version I annotated to call out elements that are relevant to the approval of this project.

Third, I am able to share a Dropbox link to the CHC/staff photos for 1848 S. Gramercy Place. However, I suspect you may wish to acquire the photos directly from the Department. Please just let me know how you wish to proceed on that.

And last, again I do reserve the right to submit further comments after we see and hear the presentation from Applicant at today's hearing, noting that the files online were incomplete.

Thank you very much,

Laura Meyers

Cell 323-868-0854

LAURA MEYERS

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March 21, 2022

City Planning Commission
RE: CPC-2020-2115-DB (HCA), 1848 S Gramercy Place

Dear Commissioners:

I am a strong supporter of new housing. I personally helped shepherd through the community the new Gramercy Apartments, an award-winning, 64-unit affordable senior complex located at 1856 S. Wilton Place (Washington Boulevard between Gramercy and Wilton). As a longtime member of my neighborhood council and its land use co-chair, I have helped usher through approvals for well over 1,000 housing units in our community in the past decade – half of which are affordable units. I worked closely with the Clifford Beers organization to help envision a 22-unit affordable supportive housing project that will incorporate a rehabbed 1908 house into the project, located at 1808 S. St. Andrews Place.

The best of these projects considered very seriously how to be good neighbors – how to design a project that is compatible with its neighborhood while at the same time providing much-needed housing.

Today, however, I am writing you to strongly request that you DO NOT approve the proposed project at 1848 S. Gramercy Place. Please do not say “yes” to the construction of a massive, 31,263-square-foot, seven-story, 75-foot tall building on a single city parcel with nearly 100% lot coverage, little to no setbacks, two above-ground levels of parking, for 33 units, 3 of which are affordable.

It will fill nearly every spec of space on its lot. It will tower over my neighborhood. It will eclipse the great design of the Gramercy Apartments. At a 5.1:1 FAR, its by right square footage of 9,195 more than triples. The building will have no common open space, nor a pedestrian-oriented plaza; it will have little-to-no landscaping, and will decimate at least two mature street trees, one of which is a Sycamore (likely a Protected tree). And, worse of all, it will displace some 20 to 25 low-income residents/renters who have been living in this house, which has operated as a supportive housing group home/dormitory for nearly two decades.

I ask that you DENY approval of the eight requested waivers. I urge that you reject the Categorical Exemption as a CEQA clearance.

We all agree, as the State Legislature has stated, that the lack of housing, including emergency shelter, is a critical statewide problem. We know that lack of supply and rising costs are compounding inequality and limiting advancement opportunities for many Californians. That’s the reasoning behind recently enacted state laws that require approvals of many – but not all – proposed housing projects.

This proposed housing development project is one of the exceptions. It is inconsistent with multiple zoning ordinances and land use designations; and it is not in compliance, and not in conformity, with “an applicable plan, program, policy, ordinance, standard, requirement, or other similar provision” (this is the language of the state legislation). The Applicant was informed every step of the way that his project needed work, that it was not complete, and was not compliant (there are multiple, increasingly defiant and belligerent emails in the case file from the Applicant’s representative that support this statement); and of course this request is discretionary, since the Applicant is asking for off-menu incentives and multiple additional waivers/concessions.

The Planning Department memos on implementing California’s housing and density bonus laws note that Developers can *request* off-menu incentives and waivers of development standards that extend beyond the incentives enumerated by State law provided that applicants can demonstrate that their request is necessary to allow for the project’s physical construction.

What the City memos do not say is that the requests **need not be granted** if the proposed project is objectively non-compliant with previously-adopted plans, zoning or local standards. Specifically, when one reads the entirety of the law, it says that cities, including charter cities (Los Angeles) cannot turn down a proposed development if it complies with applicable, objective zoning standards (uniform benchmarks), including design standards. But this project **DOES NOT** comply with those benchmarks, and therefore the City need not make a finding of specific, adverse effect.¹

Government Code Section 65915 does mandate that the City grant a density bonus when a project provides a specified amount of affordable housing. For this proposed project at 1848 S. Gramercy Place, which is offering 10% of the units as Very Low Income units, the City shall approve, according to Section 65915, “Two incentives or concessions for projects that include at least 17 percent of the total units for lower income households, at least 10 percent for very low income households...”

However, the Applicant is requesting two incentives PLUS eight “waivers” (concessions). You do not need to approve any nor all of the waivers/concessions – just two out of ten of the combined incentives and waivers.

This project’s Applicant is not arguing that the combined incentives and waivers/concessions are necessary for the physical construction of a project but rather, that the Applicant needs all of these concessions to build it the way the Applicant envisioned and designed it. This is circular thinking. It would lead to the conclusion that anyone can ask for anything, in any zone in the City – so long as they are also building a couple of affordable housing units – and receive a yes answer, *no matter what*.

¹ “When a proposed housing development project “complies with applicable, objective general plan, zoning, and subdivision standards and criteria, including design review standards, in effect at the time that the application was deemed complete, but the local agency proposes to disapprove the project or to impose a condition that the project be developed at a lower density, the local agency shall base its decision regarding the proposed housing development project upon written findings supported by a preponderance of the evidence on the record that both of the following conditions exist:

(A) The housing development project would have a specific, adverse impact upon the public health or safety”

This defies logic. Why would we have any zoning at all? Or a City Planning Commission? Or so-called discretionary projects, if there is no discretion to make informed judgements?

Can anyone build a megastructure anywhere in Los Angeles, just because they want to?

Please let us not confuse the phrase “development standard” with the actual zoning. The actual zoning on this property at 1848 S. Gramercy Place is **C1.5-1VL-CPIO**. The 1VL is NOT a development standard; it is an adopted height district of “very low” that not only regulates height but also FAR. In the C zones, 1VL specifies an FAR of 1.5:1. Again, this is not a development standard, it is the zoning. That zoning is itself further defined by both the CPIO and the Mid-City Recovery Redevelopment Plan – both of which lay OVER the underlying zoning, and not the other direction. What does that mean? It means that any project is subject to the regulations of the underlying zone, the CPIO and the redevelopment plan. For a Density Bonus project, the decision maker may well need to determine what items are “regulations” versus what items may be “standards.” And which are “objective.”

Objectively, this parcel’s zoning requires certain specified setbacks on all sides. There is a confusion regarding the front setback – is it 10 feet (per the C1.5 zoning)? Is it 7 feet (that is in the CPIO)? Is it zero feet (also the CPIO, but noting the requirements for the Washington Boulevard commercial corridor were predicated on an assumption that new projects would face the commercial boulevard, not the residential side street.) But there is no confusion, objectively, as to the side or rear yard setbacks.

Applicant is requesting a zero-foot side yard setback. Potential future fire-fighting difficulties aside, this would leave only a five-foot separation between this building and the small multi-family apartment building to the north. This is unhealthy for those residents.

Objectively, the zoning specifies “three stories or 45 feet” as the maximum height. Usually for density bonus projects, a developer may request a one-story or two-story increase (11 to 22 feet); here we have a request for a four-story increase, more than 100% increase (and two of those stories are above-ground parking).

Objectively, the CPIO requires utilizing transition height adjacent to residential zoning/uses at RD1.5 or lesser zoning. The adjacent parcel is zoned RD2. Applicant requests relief from this requirement.

Objectively, the project requires 3,700 square feet of open space, and it should be communal. Applicant requests a waiver from this, too, down to 1,500 square feet – mostly individual apartment balconies (and not all of the apartments have balconies).

Without the open space, there is also virtually no landscaping. This one is a little less objective in that the amount of landscaping may not be defined. But zero is zero.

Objectively, the CPIO (and also the Redevelopment Plan) requires a measurable commercial component with a 14 foot ground floor interior height and 17.5 feet of commercial frontage. The redevelopment Plan would require this to support economic revitalization on a commercial corridor. However, Applicant requests a reduction to 10 feet in height and 10 feet of frontage, yielding a very small commercial space in the building.

The community worked very hard to achieve the Washington Boulevard Corridor’s CPIO (which we had initiated ourselves beginning in 2004 as a proposed “Washington Boulevard Specific Plan.”)

The effort began two years before that, with CORO training for some 60 community leaders in CD10, who together came up with the broad program to revitalize the District’s commercial corridors, which remained blighted despite many improvements in the residential areas. The community worked with the Planning Department and also the Community Redevelopment Agency to rethink the zoning on Washington Boulevard (which was primarily Q-CM but had many more warehouses and abandoned buildings than industrial uses). The idea was to help revitalize the Washington Boulevard Corridor and to permit some reasonable amount of new housing while still conserving the adjacent historic neighborhoods, Angelus Vista and Arlington Heights.

This Public-Private partnership between the community and the City allowed many well-considered regulations to be put into place, winning the support from the community to change the zoning to allow housing. There were de facto guarantees that, for example, new buildings would be limited in height to three stories, with exceptions to be made for 100% affordable housing projects. The result: the adoption of a corridor-specific, neighborhood-serving CPIO along the western portion of Washington Boulevard (Arlington to Crenshaw) reflecting the community’s goals and policies.

In 2017, that first CPIO for Washington Boulevard was adapted and then adopted for the eastern portion of the Corridor (Normandie to Arlington) and, in fact, also adopted for similar commercial corridors throughout South Los Angeles – inspired by the work we did in our neighborhood. The Planning Commission approved the CPIO in June, 2017; the City Council adopted it the following Thanksgiving, and it became effective on December 29, 2018.

The new zone, C1.5-1VL-CPIO, was greeted with open arms. But now it seems regrettable, since the Planning Staff responsible for assuring its regulations are applied instead are recommending to the Commission that CPC totally ignore the zoning – not to mention the still-in-effect redevelopment plan – and approve a project that is so massive that it will dwarf every building for miles around and yet be squeezed onto one single city lot.

The CPIO’s intent is clear: “...to revitalize neighborhood commercial areas to better serve nearby residential neighborhoods. Basic development standards promote the aesthetic upgrading of the subarea, and regulations seek to encourage a diverse range of services and retail uses.”

The CPIO also states: “Basic development standards promote the aesthetic upgrading of the subarea, and regulations seek to encourage a diverse range of services and retail uses. Projects within a Corridors Subarea *shall* comply with the applicable supplemental development regulations in this Chapter.”

This proposed project is non-compliant and inconsistent with the CPIO in numerous ways (e.g., as presented, in *every* way that requires a waiver and/or off-menu incentive).

Applicant's justification for requesting each of the off-menu incentives and waivers/concessions is that the current zoning constrains the project. But these "constraints" are self-imposed. Any reasonable person would read the zoning regulations, take a look at the property he or she owns, and hire an architect who could design a proper building with a reasonably-sized commercial space and a desirable number of units without triggering the need to either A). actually apply for a variance from the zoning (as should have been required in this instance) or B). apply for an excessive number of waivers, in addition to two off-menu incentives.

Noting that at the time of the Applicant's purchase, October 2017, new residential projects were forbidden on this stretch of Washington Boulevard. The zoning was "Q-CM" commercial manufacturing. The Q condition on Washington from Normandie west to Arlington was in a stage of being eliminated in favor of the then-proposed CPIO, but that had not been approved yet. The Redevelopment Plan also did not permit new residential uses at this site when the Applicant purchased the property. Applicant should not have had an expectation at the time of purchase that anyone would be able to build a multi-family residence.²

Tree canopy

To the extent this project is by right, as a Density Bonus project, it still boggles the mind that the architect and the Applicant failed to consider the simple impacts (and simple fixes) this project would have on the public realm on Gramercy Place. The east side of Gramercy has a series of beautiful, mature street trees reaching heights of 40 to 50 feet and with canopies of, it appears, 30 feet. If the building's design was flipped, so that the existing driveway remains the driveway, then there may not be a need to cut down the lovely Camphor tree in front of the house.

Also, on the initial Application evaluation forms, Applicant stated there are "No" mature trees on the lot. That is not true, as evidenced by a later evaluation stating otherwise.

Of equal concern is the future of the adjacent Sycamore tree, which may be a Protected Tree, which sits at the lot line. With the driveway on the north side of the project, combined with the zero-foot setback and construction need to excavate for the concrete (and likely steel) foundation, the project cannot help but cut deeply into the roots of the tree. If instead the project to have its 10-foot side yard setback on the north side, AND was set back from the street by the same amount, and the driveway was on the south side, then likely both trees can be saved.

Application Veracity

So much about this project is murky, including its ownership, compliance with notice, and actual use (as described previously, and by others, and above).

² And in fact, the residence was sold as an ongoing operation with tenants; the MLS Agent's Private Remarks stated: "*This home is currently managed as a sober living and is quite profitable.*" The Applicant has continuously operated this business subsequent to the 2017 purchase.

The property was purchased in the name of an individual (Janet Jha, the wife of the project’s advocate, identified as the Applicant’s representative, Akhilesh Jha, in some paperwork) and recorded as such.



However, the submitted project plans and renderings show the owner to be “**Gramercy Manor LLC**” (see the name in the image to the left, below the architect’s stamp). This entity is owned by Janet Jha.

This is important because if the property is individually owned, then it is not subject to AB 1482, the State’s rent control ordinance; but if an entity owns the property, then the gentlemen who live at the house have far more rental protections and their eventual eviction(s) are more difficult to accomplish. So it is legally smart to avoid the ramifications of AB 1482 if one wishes to more easily remove one’s tenants.

But should we, as a City, continue to look the other way when it comes to the displacement – and potential homelessness, given the vulnerability of their housing situation – of the men who live at this home? Should we simply rubber stamp the Applicant’s assertion that no one does live there, or has lived there, other than in single family use? Should we also look the other way when the Staff Recommendation Report says the residence is “vacant” when in fact, on this day of writing my letter, it is visibly occupied by multiple tenants?

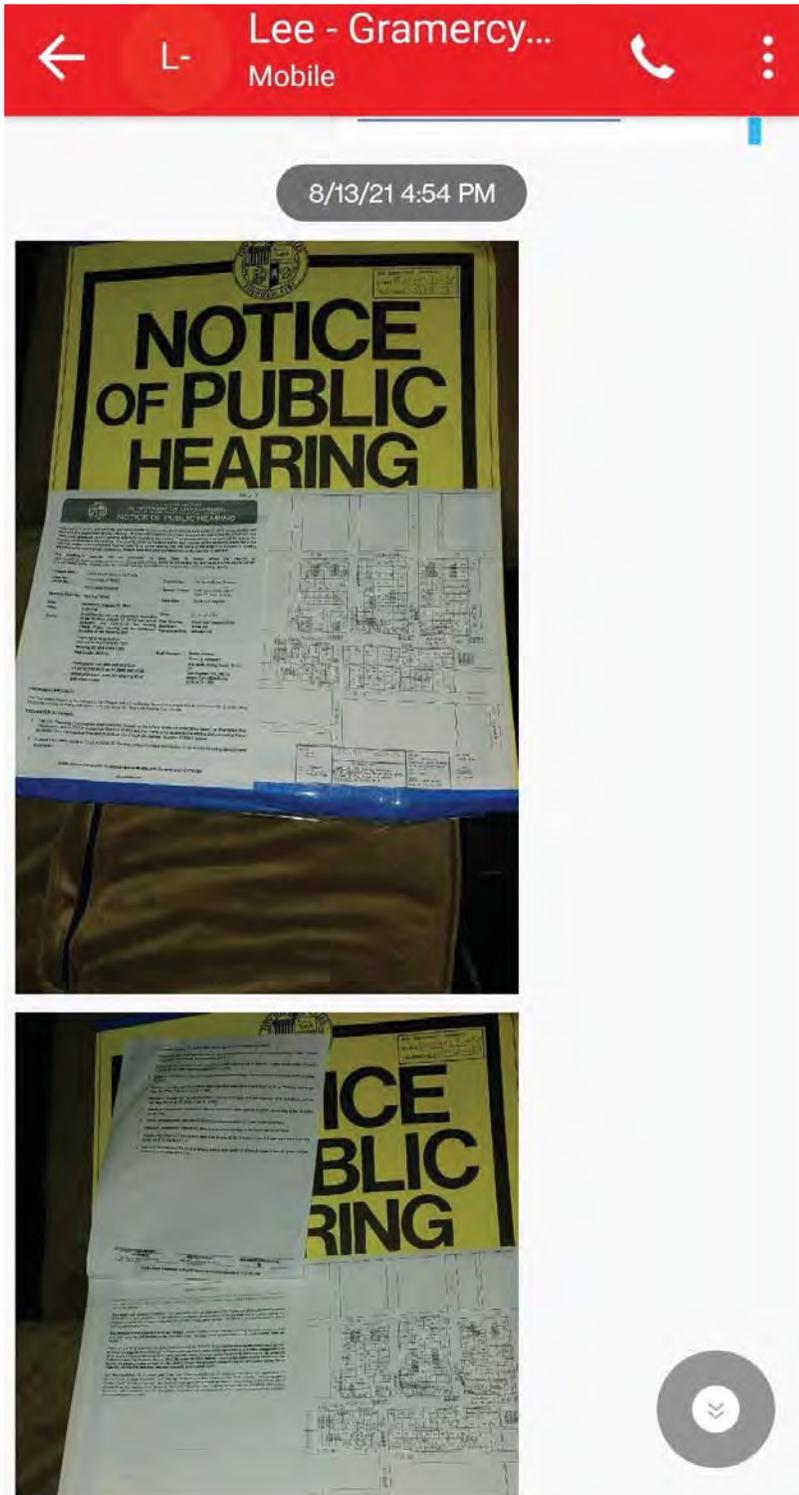
Gramercy Manor LLC is an active entity, with annual Secretary of State filings. It even qualified for two PPP loans during the COVID crisis.

There are other questions regarding this situation.

For instance, Planning Staff received numerous complaints in advance of the Staff-led CPC August initial hearing that the property WAS NOT POSTED with a hearing notice. But how does one prove that? Well, coincidental to my doing a Public Records Request (PRA) in late August regarding this case, I also received copies of emails between Staff and the Applicant’s representative Akhilesh Jha about whether or not Applicant had in fact posted the notice.

First, Akhilesh Jha emailed a photograph taken by his “manager” Earl Lee, purporting to show evidence of the posting (see below). Planning Assistant Rafael Fontes emailed back, stating that the photo was difficult to see, and could a new photograph be sent.

Here is the first photo. Most of the neighbors who have looked at it think the notice is affixed to a brown sofa cushion. Please compare it to the photo on the next page:



After receiving the photo above, Mr. Fontes asked Mr. Jha to send a better photo that would show the house in the rear. Here it is:



Please note that on the front porch amid other furnishings is a pile of brown sofa cushions. Clearly Applicant had not previously posted the notice and, when it was called into question, the manager scrambled to provide the visual proof.

My PRA request in August yielded 170 documents, including these unintentionally. If the Commissioners would like to review the others, here is the link to the “data dump.”

<https://spaces.hightail.com/receive/6Sa1B1y4gc/dXMtOWFjYmE2NjQtN2RmYS0xMwVhLWFiYtQtMGEyYzYxZTgxOGNj>

Why is this important more than six months later?

First, it brings into question the validity of the public hearing. I am unaware whether or not anyone asked for that hearing to be repeated. I also do not know whether or not – if the property had had a proper posted notice – more people would have attended the virtual hearing. In fact, I do not know how many attendees were present, since the Staff Recommendation Report only refers to the number of people who testified.

However, if there is any question as to validity, I would then argue that the Commission itself must endeavor to have a full, robust hearing on Thursday – not quite a do-over, but please more than the usual one minute apiece, in order to allow you to hear fulsome testimony.

Second, this represents just one more example of a lack of veracity on the part of the Applicant's team.

How can we know what else in the Application is true, or false, if the most simple matter of posting a Notice of Public Hearing is not just ignored (remember, neighbors who live on the block and in the surrounding blocks had complained about the lack of posting, which led to Mr. Fontes reaching out to ask about it) but then clearly and visibly lied about?

- Is it true that no one lives at the house? NO.
- Is it true that it has been in use as only a single family home? NO, not for two decades.
- Is it true that it is not subject to and qualifies for an exemption from AB 1482, the California Tenant Protection Act?
- Is it true that

And, bluntly, does the City want to be in the position of saying “Yes” to multiple incentives, waivers and concessions, when State law basically authorizes only two, for an Applicant who is beginning to appear to be a bad actor?

Group Home/Supportive Housing

I know others have written about this, and you now also have my initial comment letter from August (which was submitted to your file by a colleague when we all realized Staff had failed to include it in the Staff Recommendation Report). The City has photos demonstrating that in fact multiple people live in the house, in dorm-like bedrooms. You can see these photos with beds, dressers, hanging clothes, and other men's belongings on pages 120, 121, 132, 133, 134, 140, 141, 142, 143, and 144 of the Staff Recommendation Report.

I have inserted just one example below:



Conclusion

I am not opposed to a good housing project on this site. Of course, as you likely know, I am an advocate for preserving our historic fabric and the character of the neighborhood. One definition of a “good housing project” would be to simply build units in the rear of this property – that would be allowed by right – and rehabbing the house itself to either accommodate a continuing group home operation OR a commercial use OR a mixed commercial (on the first floor) / residential use.

But a properly-designed new building that respects the neighborhood, and respects the regulations, would also fulfill all of our goals to provide more safe and healthy housing.

The C1.5-1VL-CPIO zoning already offers a substantial incentive for Density Bonus projects, upping the base density from 1/800 to 1/400. The trouble here is that the Applicant wants to go far beyond reason, with little public benefit.

For that reason, I request that you DENY the waivers, DENY the categorical exemption, only approve the two incentives if you are truly required to, and REQUIRE that the project be re-designed to, among other things, move the driveway to the south side and have a 10-foot side yard setback on the north side, adjacent to the residential structure.

Thank you,

Laura Meyers



March 17, 2022

City Planning Commission
Los Angeles City Planning Department
Los Angeles, CA 90012

CC: Cecilia Lamas, LADCP
Rafael Fontes, LADCP

RESOLUTION AND COMMUNITY IMPACT STATEMENT:

**RE: Case No. CPC-2020-2115-DB-HCA– 1848 S Gramercy PI - OPPOSED
CPC Meeting scheduled for March 24, 2022**

This letter is to formally inform the Los Angeles City Planning Commission (CPC) that on October 7, 2021, the United Neighborhoods Neighborhood Council (UNNC) voted to affirm its position and re-adopt the below letter as a Resolution and Community Impact Statement to be sent specifically to the CPC upon that time that the above case was to be heard for its final approval or denial.

That CPC meeting is scheduled for March 24, 2022. As this letter is a resolution, we request our due time as an NC to present our position, which is OPPOSED to the project as presented and per the letter below. At this moment, it is UNNC's intention that I (John Arnold) will represent the NC at the meeting. If that changes, I will let you know who will be the designated representative. Note that we also have several NC stakeholders who live close to the site and who may also be present at the meeting to testify as individuals.

Below is the board's motion and formal position on the case from August 12, 2021. Attached in the email with this letter is the BAC (the voting record, if needed) from the October 7, 2021 UNNC governing board meeting authorizing this Resolution and Community Impact Statement to the CPC.

The UNNC Governing Board shall write a letter to the City of Los Angeles Planning Department, Council District 10, City Planning Commission, and other City governmental bodies, as appropriate, for the 33-unit Density Bonus project referenced above voicing the following concerns with the proposed project, based on an original motion passed by the UNNC Planning and Zoning Committee on November 4, 2020:

- a. The current structure on the site, proposed to be demolished, is affordable housing for approximately 25 special needs individuals. Historically, the UNNC*

Governing Board is extremely sensitive to the reduction of affordable housing in the district (as this project is proposing). Additionally, there is concern over the fate of the tenants even after required relocation payout, which was not outlined by the applicant. It is unclear whether payout will be per person, per unit, or some other baseline, and whether that is sufficient to keep from creating many homeless individuals as a result of this project.

- b. The current design is aggressively pursuing “off menu” Density Bonus incentives. The applicant is asking for 12 incentives that attempt to justify the inclusion of 33 units (the maximum allowed for a density bonus project). The incentive requests are unusual, egregious, and aggressive, including: addition of 30’ of building height and 4 extra stories (45’ allowable to 75’ height – normal density bonus incentive is 11’ and 1 extra story); provision of no open space except private balconies and a gym (60% reduction as compared to the standard 20% reduction for density bonus projects); provision of no landscaped areas except 18” possible planting along the north and east property line; reduction of the required commercial space for a mixed-use building from 17’-5” to 10’-0” of frontage; reduction of setbacks beyond the normal 20% allowed for density bonus projects (0’ front setback in lieu of 10’, 50% reduction at sides, and 74%-48% variable reduction at rear); provision of no transitional height to abutting residential lots; a proposed 193% increase in lot coverage (normal density bonus incentive is 20% increase); a proposed FAR increase beyond what is allowable for a density bonus incentive, among others. Additionally, Density Bonus projects are normally only allowed 3 incentives in lieu of the 12 proposed.*
- c. The pre-existing 40’ building line along Gramercy Pl, which conforms to the entire street, appears to have been removed since the filing of the case in 2018, and an inquiry needs to be made if this was done in error. UNNC committee investigation in 2018 indicates that this appears to be done in error.*
- d. The current design elevations were not provided to the Planning and Zoning Committee or the Governing Board. With a previous version of the project (on which the Governing Board passed a similar motion of non-support on December 6, 2018) with a similar floor layout but two stories shorter from 2018, the architectural design, neighborhood fit, and tenant habitability were not adequately considered. The design had an apparent disregard for the South Los Angeles CPIO conditions for the site that requires design review to ensure conformance with the character and development standards, such as setbacks, and lot development intensity. The current project will need to have a public hearing at the City Planning Commission (CPC), where design will be a consideration, including any effects on design performance from the requested off-menu incentives, and the omission of building design from the submittal renders the project incomplete and difficult to assess by the UNNC in advance of the CPC hearing.*
- e. The building, as currently designed, has multiple Building and Safety design violations (e.g. fire access, utility provisions, exiting, and building code setbacks).*

United Neighborhoods Neighborhood Council

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When these are resolved during plan check, the planning requests and character of the building will change significantly. This therefore makes the current proposal difficult to assess, much less approve, for entitlements.

- f. The mostly market rate project does not provide significant community benefits or resident amenities to justify a request of this magnitude, including adequate provision of affordable housing to replace what is lost from demolition.*

Further, the Governing Board requests of the Planning Department to allow the above provisions to be adjusted by the UNNC Planning and Zoning Committee and Governing Board in the event of any new information, such as a rendering or elevations, becomes available and which will further inform the position UNNC and its recommendations to City Council, Planning Department, and City Planning Commission.

The United Neighborhoods N.C. was certified in May 2002, and is one of the largest neighborhood councils in the City of Los Angeles, representing 80,000+ residential and non-resident stakeholders in the neighborhoods roughly bounded by Pico on the north, Exposition Place on the south, Crenshaw to the west and Normandie-Western-Arlington to the east. The subject property is within UNNC boundaries. This matter has been voted upon at public meetings which have complied with the Brown Act in their agendas and distribution of meeting notices, and at which were present members of the general public.

Thank you. Do not hesitate to contact me with any questions.

Sincerely,



John Arnold
UNNC Chair of Planning & Zoning Committee
323-829-9987
John.Arnold@UNNC.org



March 21, 2022

Los Angeles City Planning Commission

RE: *CPC-2020-2115-DB (HCA), 1848 S Gramercy Place*

Dear Commissioners:

West Adams Heritage Association (WAHA) routinely comments on planning issues affecting the West Adams area. We are concerned about the proposal for this 33-unit, 7-story project with virtually no setbacks, no communal open space and no landscaping at this site.

WAHA supports sensitive infill housing, both market rate and affordable, but not at the expense of the soon-to-be-displaced neighbors. For clarity, the Staff Recommendation Report is mistaken in calling this house “vacant” when actual visitors to the site can testify otherwise. As of this writing, the house is occupied by a group of tenants who have been there for many years. Cars drive in and out, and park at the house; men socialize on the front porch, and every Monday morning the normal trash is set out for pick up. People visibly live there.

Regarding the project being proposed: It is so out of character with the neighborhood and so out of conformance with all the Redevelopment Plan, the CPIO, and zoning regulations that on its face it ought not to be subject to a categorical exemption (CE). This is described in more detail below.

To base this CE upon a Class 32 categorical exemption to environmental review under CEQA is inapplicable because the Project is inconsistent with City planning and zoning policies, goals, and regulations. The use of a categorical exemption is also unavailable because the Project may have aesthetic and cultural resource impacts on this historic West Adams neighborhood (Angelus Vista), at both a Project and cumulative level. Further, the Project is inconsistent with the Mid-City Corridors Recovery Redevelopment Plan requirements for compatibility.

There are cumulative effects of multiple demolitions in the City Planning Department’s own identified historic district (e.g., the District formerly called the “18th Street Neighborhood Historic District”). For purposes of CEQA, the District need not be designated to require a further investigation into impacts and exploration of alternatives and/or mitigations. A CE is not appropriate. A categorical exemption is not the appropriate level of environmental review for a project that is highly discretionary, is in a historically sensitive environmental and fails to meet objectives of the community plan and redevelopment plan.

The project will have a demonstrable significant effect on the environment and does not qualify under Article III, Class 32 exemption.

The Class 32 "Infill" Categorical Exemption (CEQA Guideline Section 15332), hereafter referred to as the Class 32 Exemption, exempts infill development within urbanized areas if it meets certain criteria. **The class consists of environmentally benign infill projects that are consistent with the General Plan and Zoning requirements.** This class is not intended for projects that would result in any significant traffic, noise, air quality, or water quality impacts. The sheer number of waivers requested to justify this project calls into serious question any compatibility with the adopted Community Plan, its CPIO, and the Redevelopment Plan.

A CE should not be issued when there are unusual circumstances creating the reasonable possibility of significant effects; the project may result in damage to scenic resources, including, but not limited to, **trees**, historic buildings, rock outcroppings, or similar resources. This project appears to be specifically removing a mature Camphor tree in the public realm/parkway, and also appears to endanger the adjacent (likely protected) mature Sycamore tree also in the parkway, on the lot line (its roots would not survive the construction at a zero-foot setback).

A categorical exemption also should not be issued when there are sensitive issues and the project fails to comply with the redevelopment plan, CPIO and the community plan's stated objectives. To permit a CE in this case would cause irreparable and irreversible harm to the environment.

Here are just a few of the land use issues where the project is non-conforming and is in conflict:

The zone is C1.5-1VL-CPIO. The 1-VL is a height district ("very low") with a maximum of 3 stories and 45 feet. The normal density bonus incentive is one more story and 11 more feet. Why would 7 stories and 76 feet ever be deemed appropriate? It is out of character with any building currently existing on Washington Boulevard from Figueroa until at least Culver City, except for the one building, *Casa Vertigo*, on Oak Street.

For the CPIO, there is a required front yard setback of 10 feet that seems to have disappeared from all discussions in the Staff Recommendation Report. In any case, noting there are conflicting regulations, the Mid-City Recovery Redevelopment Plan (which is also an "overlay" like a specific plan over the underlying zoning) does require that setbacks be compatible with adjacent properties as one of many components to be considered before approving a design or approving discretionary actions, and there is no language in the CPIO overriding that requirement.

The project is exceptionally over-reaching and even its two density bonus incentives are categorized as "off-menu"; it asks for multiple "waivers" (versus incentives) yet provides few public benefits in return. The project will displace, and has begun to displace, 20-25 low-income individuals. Only 3 ELI affordable units are offered in return. Why wouldn't more RSO/affordable units be required?

Why has applicant continued to state the residence is in use as a "single family home" when it is observable and provable, in the City's own records, that the use is and has been for a long-time supportive housing/boarding house/dormitory?

The redevelopment plan specifically says its policy is to NOT displace individuals or families of low or moderate income; and that the Redevelopment Plan does not permit any variation (e.g., variances or other discretionary grants) that would be "contrary to the objectives of this Plan."

The 1907-1908 house is identified as a Contributor to the "18th Street Neighborhood" historic district (essentially the Angelus Vista Tracts I and II, and adjacent smaller tracts). That this is not an HCM does not dismiss its Contributor status to a potential historic district; and the Cultural Heritage Commission's action was appropriately silent as to that. Also, one of the policies within the Redevelopment plan is that the City shall "encourage historic preservation" (page 25, #700).

Unfortunately, though the City has now adopted that historic district as the "Angelus Vista Character Residential Overlay District CPIO" (excluding commercially-zoned properties in that overlay but that doesn't mean they no longer contribute to the underlying historic district) – the community has experienced since that adoption multiple demolitions of historic homes after the effective date of the Character Residential District in late December 2018. The demolitions include 1509 S. Gramercy Pl.; 1537 S. Wilton Pl.; 1839 S. Gramercy Pl. (across from the Subject property); 1540 and 1546 S. St. Andrews Pl.; and 1660 S. Arlington, all of which were constructed between 1903 and 1910 and represent the remaining original homes. Several other homes from that era are facing demolition, including 1310 S. St. Andrews and the subject property at 1848 S. Gramercy Place. Technically, this series of demolitions is a cumulative effect that would be an exception that disallows the use of a categorical exemption.

The Redevelopment Plan also specifically states that setbacks may be established that exceed the requirements of the City's zoning ordinance(s) and it also places an emphasis on "adequate amounts of affordable housing."

It is concerning that the application seems nowhere to relate to the Redevelopment Plan which we understand to be in effect as an overlay through the year 2028.

The waiver requests appear excessive and contrary to the Redevelopment Plan and CPIO. Lot coverage is not 30% but rather 88%. The setbacks are insufficient. A 60% reduction of open space cannot be justified. Balconies are being counted as open space and this ignores the environmental need for green space and landscaping. There are significant impacts to adjacent properties in massing, scale and air quality. The developer needs to look at underground parking to reduce mass. The developer is not conforming to the area's most basic environmental needs nor responding to the CPIO and Redevelopment Plan.

If the developer proceeds with this project as currently designed and proposed, it will not meet the qualifications for a categorical exemption. Therefore, WAHA asks that the Commission send this project back to planning for environmental review and not adopt the CE.

Roland Souza, President
West Adams Heritage Association
c/o 1724 Westmoreland Boulevard, L.A., CA 90006
preservation@westadamsheritage.org
roland.e.souza@gmail.com



March 21, 2022

Rafael Fontes, Planning Assistant

rafael.fontes@lacity.org

(213) 978-1179

Dear City Planning Commission,

We are writing to you in support of the proposed 33-unit mixed use development, including 3 affordable units, at 1848 South Gramercy Place, cases CPC-2020-2115-DB-HCA/CEQA No.: ENV-2020-2116-CE. We urge the city to find the project Categorical Exempt from the provisions of CEQA and to approve it with the Density Bonus and additional incentives.

The greater Los Angeles region is facing a severe housing shortage, particularly affordable housing. Abundant Housing LA believes that these housing challenges can only be addressed if everyone in the region does their part.

This project is in a walkable neighborhood, close to bus stops and walking and bicycling distance to shopping, restaurants, and schools.

It is great to see the developer using the Density Bonus program to bring new homes, including badly needed affordable housing to the city. Affordable housing programs that depend on a percentage of new construction being affordable need a lot of new construction to have an impact, and the city should work to increase the number of developers using the Density Bonus. This project is a good project for Los Angeles and for the region. Again, we urge the city to approve the Density Bonus and incentives, and find the project Categorical Exempt from the provisions of CEQA.

Best Regards,

Leonora Camner

Leonora Camner
AHLA Executive Director

Jaime Del Rio

Jaime Del Rio
AHLA Field Organizer

Tami Kagan-Abrams

Tami Kagan-Abrams
AHLA Project Director



Planning CPC <cpc@lacity.org>

Item 8 Case No. CPC-2020-2115-DB and ENV-2020-2116-CE, 1848 S. Gramercy Place

Benjamin Steen <ben.d.steen@gmail.com>
To: cpc@lacity.org

Wed, Mar 23, 2022 at 12:48 PM

This proposed building is an insult to those of us who have invested time and money to preserve the historical integrity of our homes in the adjacent Western Heights HPOZ. We all understand the need for higher density housing, but this project is asking for too much while providing very little in return for our community.

I stand with my neighborhood of Western Heights in urging the commission to reject all of the waivers for this project.

Ben Steen
2251 w 20th St



Benjamin Steen
Focus Puller
Camera Operator
IATSE Local 600
818.309.5419

Christine Carlson
Demetrius Pohl

2179 West 20th Street
Los Angeles, CA 90018
Tel: +1 323 735 1027
dpohl@carlsonpohl.com

Los Angeles City Planning Commission

March 23, 2022

Dear Commissioners:

RE: CPC-2020-2115-DB (HCA), 1848 S Gramercy Place

My wife and I live some 600 feet southeast of the proposed seven story residential building and from the upper floors of our 1903 American foursquare transitional craftsman house we have a view north to the Hollywood Hills over single to three story houses. The proposed project would be totally out of scale with surrounding neighborhood in its height, and massing. We are strongly opposed to it and ask you DENY all waivers.

Not only is the project out of scale, the Proposer's application is egregiously deceptive and mendacious, and their request for waivers attempts an end-run around the City's and Planning Department's zoning requirements and building regulations. The zoning of the property is C1.5-1VL-CPIO. The 1VL zoning designation is Height District 1, "very low," i.e., a maximum of three stories, and 45 feet. The Applicant wants to erect a 7-story, 76-foot building, more than 100% out of compliance in terms of the number of stories. This is not a mere "waiver" of a development standard, but a wanton disregard of it.

The Applicant's proposal includes waivers from lot coverage; setbacks; height; transitional height requirements; common open space; required commercial frontage; landscape buffers; and more. The project is not in compliance with either the Mid-City Corridors Recovery Redevelopment Project or the CPIO.

The absolute lack of common open space (private balconies are not common space as the Applicant wants you to believe); the lack of side yard and rear setbacks; the utter disregard of the 40-foot Building Line on the east side of Gramercy Place; and the failure to include any sort of Transitional Height design adjacent to the RD2-zoned, two-story, 1920s fourplex north of the property are all in disregard of applicable City building standards, codes and regulations. A 7-story building at this location would be the only building of that height on Washington Boulevard between Downtown (Figueroa) Los Angeles and Culver City, a distance of 8 miles. The landmark Oddfellows Hall (Casa Vertigo), located at Washington and Oak, is only six stories. Ross Plaza, located on Western at 18th Street, is only five stories. The Applicants did not provide the Citywide Design Compliance form. The project therefore does not demonstrate alignment with the City's Design approach. The project is wildly out of compliance with many of the current planning guidelines, and the Redevelopment Plan guidelines.

The Applicant's waiver requests appear excessive and contrary to the Redevelopment Plan and CPIO. Lot coverage is not 30% but rather 88%. The setbacks are insufficient. A 60% reduction of open space cannot be justified.

The Applicants state the dwelling at 1848 S Gramercy Place is vacant, which is patently not the case; it is being used as low-income supportive housing. Lastly and most significantly, at time of a severe crisis of homelessness, the project will demolish a structure currently being used as low-income supportive housing. There is no guarantee that the residents who will be displaced, will be housed in the three proposed low-income units proposed or elsewhere.

We ask that you deny approval of the eight requested waivers and urge that you reject the Categorical Exemption as a CEQA clearance.

Yours truly,

A handwritten signature in black ink that reads "Christine Carlson". The signature is written in a cursive style with a long, sweeping tail on the "n" of Carlson.

Christine Carlson

A handwritten signature in blue ink that reads "Demetrius Pohl". The signature is written in a cursive style with a prominent horizontal stroke at the beginning.

Demetrius Pohl

March 22, 2022

To the Los Angeles City Planning Commission

RE: CPC-2020-2115-DB (HCA), 1848 South Gramercy Place (Agenda Item 8, March 24, 2022)

Dear City Planning Commissioners:

I am writing a brief comment about the obvious problematic design issues of this project. I am the broker and owner of City Living Realty. Since the 1980s I have specialized in properties and neighborhoods of architectural and historical interest. I have served on the Los Angeles Conservancy Board of Directors. I have also served on the University Park HPOZ for two decades; I am the current HPOZ Chair. In my professional endeavors, I rely on and have the utmost respect for architects, landscape architects, and other design professionals. And that is why I simply do not understand the reasoning behind the Planning Department Staff's dismissal of the assessments by both the City's Urban Design Studio and the Professional Volunteer Program (PVP), both of which rejected the project (as submitted) as being, it seems, non-compliant with all of the zoning regulations as well as the City's Citywide Design Standards.

Why would Staff go ahead and recommend approval? I ask that you **DO NOT APPROVE** this project.

The summary from the Staff Recommendation Report from the Urban Design Studio and PVP's assessments was buried within the report. So that you can easily read the assessments, I have copied the section here (*my highlights*):

"ISSUES: The following section includes a discussion of issues and considerations related to the project.

Urban Design Studio: The Urban Design Studio reviewed the project on Thursday, August 6, 2020 and received the project **unfavorably** with the following comments:

- The project is **significantly out of scale** with its surroundings.
- The **height creates issues for neighbors in the Character Residential Subarea to the north, blocking sunlight** especially and presenting **a monolithic street wall two stories high**.
- Articulation at the two-story podium is fairly limited due to parking requirements.
- The commercial space and mezzanine is fairly small in terms of square footage, limiting its utility for any future tenants.
- **Very little community benefit** is being provided in exchange for number of waivers of development being requested.

Professional Volunteer Program (PVP): The project was presented to the Professional Volunteer Program on Tuesday, June 15, 2021 and received **unfavorably**. Below is a summary of the comments organized in along areas outlined in the city's Urban Design Guidelines:

- **Pedestrian First Design**

- **The project presents operational issues.** For example the trash and recycling enclosure are too small and not accessible from the retail space and **the retail space is constrained with a difficult to lease layout.**
- Reduce the width of the driveway to the minimum allowed by LADOT.
- Consider ways to embed the stairs to the residential lobby to promote physical activity.
- **Protect and maintain the existing mature street tree.** Reach out to LAUFD to discuss potential options. If the tree needs to be removed you need to replace it in a 2-1 rate.

- **360 Degree Design**

- Provide detailed materials on the elevations.
- The project should **respond to the local area context, the public realm and the relationships with adjacent buildings and should be shaped to consider the quality and functionality of the urban fabric.**
- **Can the parking be placed underground?** If not consider ways to design the podium so it is adaptable to a different use in the future and make sure it is appropriately screened per the Above Ground Parking Advisory. A visible long wall, non-screened openings or metallic louvers overlooking residential windows should be avoided. Consider landscaping and high quality architectural elements that are opaque and add visual interest. Make sure that headlights, structure lights and exhaust gas do not impact the residential adjacent properties.
- Ensure that access and the building entrance is prominent and clearly legible and the lobby is comfortable to use with space for mail boxes.
- Use architectural elements to reduce the perceived mass of the project.
- Make sure that the project complies with the South Los Angeles CPIO District ([Neighborhood-Serving Corridor Sub Area](#)) Development Standards, including building design, articulation and glazing. For example, **a 5-foot landscape buffer, shall be provided between the project and the abutting lot zoned RD2 to the north.** The landscaping should be drought tolerant, evergreen, and capable of growing to a height of 10 feet. If you need additional recommendations, the Urban Design Studio has developed a Native Screening Hedges resource.
- The East and South Elevations need additional work.
- Windows should incorporate well-designed trims and details. Consider adding awnings above the windows at the west elevation to features to reduce heat gain and glare and add visual interest.
- Consider a redesign of the awning above the building's entrance.
- What is the small unidentified space at the back of the project?
- Consider clearstory windows for bathrooms that overlook the exterior corridor with access to natural light.
- Provide an open space diagram and ensure the balcony dimensions comply with the private open space minimum requirements. Can the rooftop used for common open space?
- **Provide more information on the landscaping of the sideyards** and **consider ways to better buffer** from the adjoining properties.

- **Climate Adapted Design**

- G Provide a rooftop plan with any mechanical units and indicate solar on the roof.
- Vines should be placed at the ground and exterior of the building's walls.
- **Indicate required and provided on-site trees.** On site trees need to be 24"-box size or above to count as provided trees and palms are excluded. Trees should be native and provide shade upon maturity.
- Consider native plants that provide year-long habitat.
- Indicate LID compliance.

In response to both the UDS and PVP feedback, the applicant team reiterated the need to maintain the current building design with respect to the Waivers of Development standard requested. The applicant claimed that these waivers are necessary to address several constraints related to the site's base zoning and the CPIO."

I believe that Planning Staff should have taken all of these directives and comments into full account, rather than to simply allow the "applicant team" to say that they have "constraints" due to the zoning. That is what zoning does – it describes the rules and regulations. While it is good that Staff included these summary remarks in the Report, albeit buried within the Report, it seems inappropriate that then Staff recommended approval just because the applicant complains about the zoning. I would ask that the City Planning Commission **REJECT** the Staff recommendation and instead **ADOPT** the recommendations from the Urban Design Studio and the Professional Volunteer Program.

I especially would prefer to see a new concept entirely that retains the 1908 house and builds units in the rear yard.

Thank you very much,

David Raposa

2515 4th Avenue, Los Angeles CA 90018

03/24/2022

Item #8

Case No. CPC-2020-2115-DB

1848 S. Gramercy Pl Los Angeles CA 90019

Dear members of City Planning Commission,

I have studied the project in a great detail.

To be built on a commercial lot, surrounded by commercial-zoned lots and apartment, this is the correct place to maximize the housing units and floor area.

This is also close to the transit point, which is another reason that we should maximize the build capacity of the lot. The project design fully addresses this point of view and, therefore, I fully support this project

Jehu Salazar
Los Angeles, CA



Item 8 Case No. CPC-2020-2115-DB and ENV-2020-2116-CE, 1848 S. Gramercy Place

Natalie Neith <natalieneith@gmail.com>

Wed, Mar 23, 2022 at 12:04 PM

To: cpc@lacity.org, natalie neith <NatalieNeith@gmail.com>

Cc: Alex Jaspersen <jaspy7@gmail.com>, Herman DeBose <hdebose@aol.com>, Gregory Jackson <gregorydjackson2020@gmail.com>, Tony Specchierla <tspeex@mac.com>, Jill & Tony Specchierla <jillandtony@gmail.com>, Douglas Hanson <dmhanson@hansonla.com>, Donna Hanson <donna.hanson@gmail.com>, Bridgette <iambreezey652@aol.com>, Charles Palmer <cpalmer6074@sbcglobal.net>, John Maroney <vtrek9679@aol.com>, Denis Soldatenko <dlspace@gmail.com>, Galen Bean <gbean01@gmail.com>, Nadine Hettle & Eric Aagaard <aagaard@prodigy.net>, Stormie Leoni <stormie.leoni@compass.com>

To the Planning Commission:

I live in the adjacent neighborhood, Western Heights,0 so this proposed structure would effectively be in my backyard.

I have been a realtor in Los Angeles for almost 33 years, primarily specializing in historic properties, and thus would consider it a tragedy to destroy this house-- a piece of our architectural history--which much historic detail (I have been inside.)

I have devoted more than 8 years volunteering as the mayoral appointee to a Historic Preservation Overlay Zone--why do we even bother to give lip service to preserving the fragile history of our city, if we are willing to let it be destroyed by non-conforming projects such as this?

While I certainly support new housing, (I am a realtor , after all), THIS structure (putting it nicely) is NOT the solution.

The staff says the property is vacant--I know it is not. I walk by there on a regular basis and see men coming and going throughout the day.I have grave concerns about displacing this large number of occupants-- (possibly up to 25?) who would then find it difficult to find housing. That is exacerbating our homeless crisis. Our community accepted and supported the recent project --just across the street--that provided senior low income housing-- that was brought before the community for community input and local residents were encouraged to visit projects by the same builders. That has NOT been the case here.

As if that is not enough, it seems the applicant is asking for not just the typical two potentially allowable waivers, but asking for 8 more special exceptions or concessions for a total of 10. Basically it is giving carte blanche to him to build whatever he wants wherever he wants , with rampant disregard for the neighborhood-- which he does not and will not live in. I do not understand how the rest of the city is expected to follow zoning guidelines and all are waived for this project.

I URGE the commission to DENY all of the waivers-- a SEVEN STORY building in the midst of a historic neighborhood?
22 parking spaces --ABOVE GROUND -(how unattractive) for a 33 unit building? It does not even make any attempt to be consistent with anything in the community--or even be attractive or appealing.

Our United Neighborhood Council came out strongly against this-- and you can be sure that the majority of the homeowners in the area would too--but unfortunately there is oftentimes little or no notification of these hearings and the process to learn how to actually be present or express opinions is so unwieldy that many of our resident stakeholders are unaware--or unable to express their opinions.
The last hearing almost made me fear that this project was being rubber stamped through with rampant disregard for any neighborhood input-- and it almost felt like it was a fait accompli!

I hope that this planning commission will do the right thing and listen to those in the community who want to preserve our neighborhood and not allow every developer to propose anything they want and expect to get planning commission support.
This community of West Adams is a treasure and I (we) hope that the planning commission will recognize that!

Natalie Neith
323 595-9414

Natalie Neith
Compass
Realtor, Architectural Director
DRE#: 01045639

www.natalieneith.com
o: 323.595.9414

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City of Los Angeles Mail - Item 8 Case No. CPC-2020-2115-DB and ENV-2020-2116-CE, 1848 S. Gramercy Place

No cost, and no obligation.



Planning CPC <cpc@lacity.org>

Item 8 Case No. CPC-2020-2115-DB and ENV-2020-2116-CE, 1848 S. Gramercy Place

Stormie Leoni <stormie.leoni@compass.com>
To: cpc@lacity.org

Wed, Mar 23, 2022 at 12:18 PM

To the planning commission I live close to the project and enjoy viewing the subject property from my window every day as it adds to the historic character of the neighborhood. I'm shocked it's not on Survey LA or protected as it is so obviously a historic contributor.

I can also say that the area on Washington is already too busy. We have excess cars parking on our streets, leaving trash compromising the character of our homes. With such a behemoth of a project, 7 stories (!) and not enough parking spots created this will only get worse. Then to hear the parking would be visible?! That is insane and would really tarnish what makes this community special.

Also there are people living there! We see the building is occupied so what is this that it's vacant? I am strongly against this and it would be an example of corruption if it snuck through - 7 stories?! It's ridiculous. Please understand how horrible this would be for the people living in the building and for the neighborhood. This is NOT the right project for this location. I strongly strongly oppose it.

--
Stormie Leoni
Top 1.5% of Agents in the US
DRE#: 01949760
m: 310.227.5996



--
Stormie Leoni
Top 1.5% of Agents in the US
DRE#: 01949760
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Department of City Planning

City Hall, 200 N. Spring Street, Room 272, Los Angeles, CA 90012

March 24, 2022

TO: City Planning Commission

FROM: Sergio Ibarra, City Planner

ADDITIONAL INFORMATION/TECHNICAL MODIFICATION TO THE STAFF RECOMMENDATION REPORT FOR CASE NO. CPC-2020-2115-DB-HCA; 1848 SOUTH GRAMERCY PLACE

The following technical modifications are to be incorporated into the staff recommendation report to be considered at the City Planning Commission meeting of March 24th, 2022, related to Item No. 8 on the meeting agenda.

The following condition of approval No.7 has been revised to reflect the correct section of the LAMC as it relates to commercial parking requirements within an Enterprise Zone and within a Major Transit Stop.

- 7. Automobile Parking for Commercial Uses.** The project shall provide a minimum of one (1) parking space, as shown in Exhibit A; ~~per AB 2345~~. as the Property is located within an Enterprise Zone, commercial parking is required at 2 parking spaces per 1,000 SF, consistent with LAMC Section 12.21 A.4.(x)(3)6.