

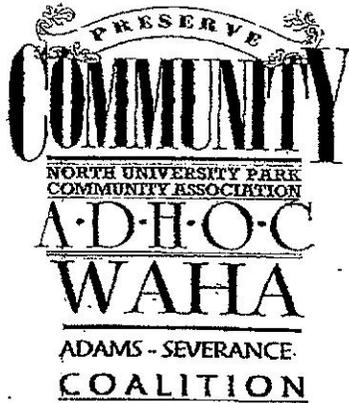
Communication from Public

Name: Adams Severance Coalition

Date Submitted: 01/14/2020 11:55 AM

Council File No: 19-1603

Comments for Public Posting: I ask that the Councilmembers, whatever else they may determine, require that the Project's parking be placed underground where it belongs and reject the Planning Department's improper use of a Categorical Exemption and require that a new environmental study be undertaken that includes evaluation of the ignored negative impacts to the surrounding historic setting. We Support the appeal.



January 14, 2020
Via email and by hand
CF 19-1603

Los Angeles City Council and Planning & Land Use Management Committee
c/o City Clerk (Holly L. Wolcott, CityClerk@lacity.org), www.LACouncilComment.com
City Hall, Room 395
200 N. Spring Street
Los Angeles, CA 90012

Re: CF19-1603
Case No. ZA-2018-2463-CU-DB-SPR-1A
Environmental No. ENV-2018-2454-CE, CD9

Honorable Members of the City Council PLUM Committee
Marqueece Harris-Dawson, Chair
Bob Blumenfield, Vice-Chair
Members Gilbert A. Cedillo, Curren D. Price Jr., John S. Lee

I am writing as Chair of the Adams Dockweiler Heritage Organizing Committee (A.D.H.O.C.) regarding my concerns about issues I have previously addressed to the Zoning Administrator (ADHOC letter 12/18/18). Of particular concern is the Project's proposed Podium-Parking. It is imperative to any potential resolution of the myriad of failed design issues the Project has proposed, that the required parking (whatever the final requirement may be) is relocated underground where it belongs.

In my letter of 12/18/18 I stated: "*I also serve on the NANDC Policy Committee and was present at its' meeting, November 27, 2018, when the representatives of the project-developer presented some basic information about the plans. One of my first questions was why the developer was not placing the parking component underground where it belonged? The answer was 'It costs a lot of money to do underground parking.'* I replied that I was aware of the costs of subterranean parking and also aware that it was however a common development requirement throughout historic University Park and cited several nearby examples of various residential projects that included underground parking:

- *2323 Scarff Street. Less than 2-blocks north of the subject site this is a 7-unit condominium project with 22 subterranean parking spaces.*
- *2317 Scarff Street. Also less than 2-blocks north of the subject site this 4-unit market rate student apartment has 10 subterranean parking spaces*

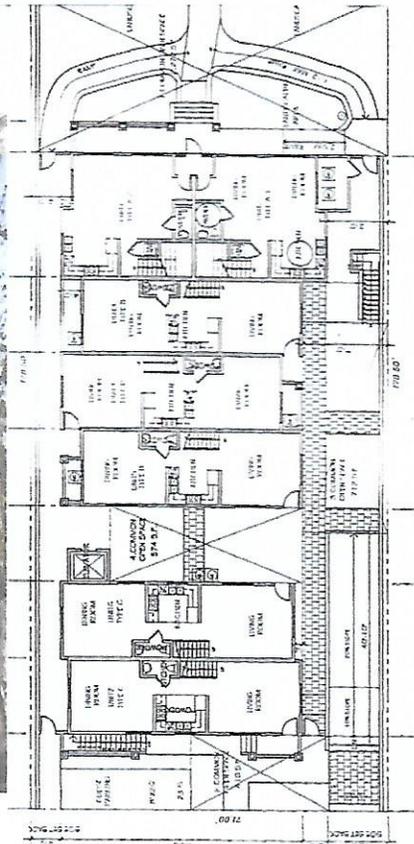
- 2000 Oak Street. Less than 4-blocks north of the subject site this 29-unit affordable housing complex has 79 parking spaces on 2-levels of subterranean parking.
- 1190 West 29th Street. Less than 4-blocks west of the subject site this 14-unit market rate student apartment has 28 subterranean parking spaces.
- 1264 West Adams, Less than 6-blocks west of the subject site this 12-unit market rate student apartment had 22 subterranean parking spaces.
- 3800 South Figueroa Street. South-east of campus this student housing apartment has 79-units (8-extremely low) with 79 subterranean parking spaces.

I informed the applicants the 29th Street example was in fact presented by the applicant & project that had just preceded them at the meeting. I asked them why it was that a small time developer had to afford the underground parking for his 14-unit project while a multi-million dollar project should be excused from the same responsibility. There was no answer. There is no answer. There is no excuse for new development not putting their cars where they belong, underground. I ask that you as the Zoning Administrator in granting any approval for this project make subterranean parking a condition for approval."

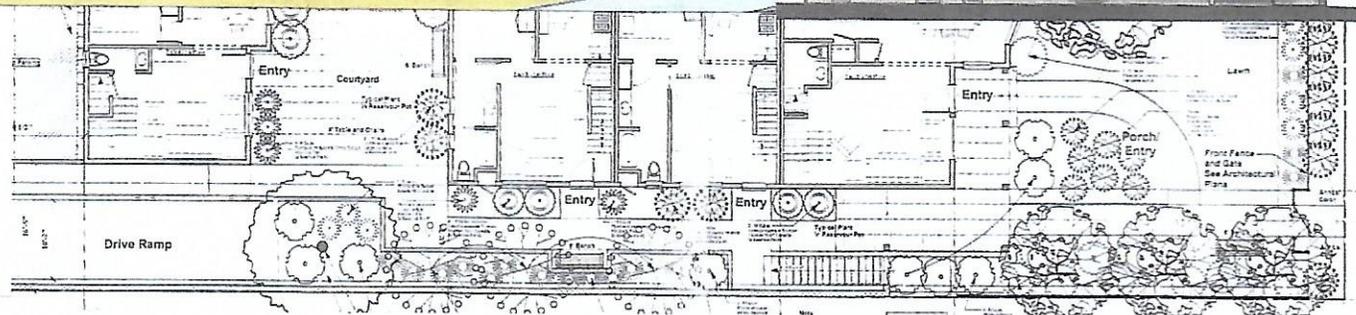
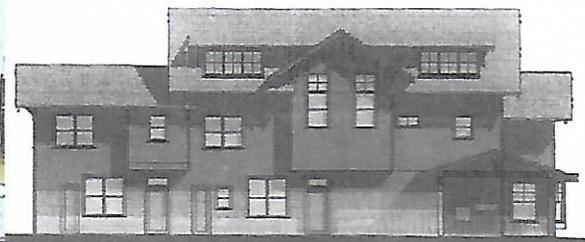
Clearly the elimination of the 1st story at-grade parking will be an excellent start in reducing the Project's objectionable scale and massing. This desired action immediately reduces the non-compatible 4-story height to a comparable 3-story configuration that relates to the surrounding historic properties. I am including several illustrative examples of nearby subterranean parking solutions for four projects just across Adams Boulevard for your comparatives.



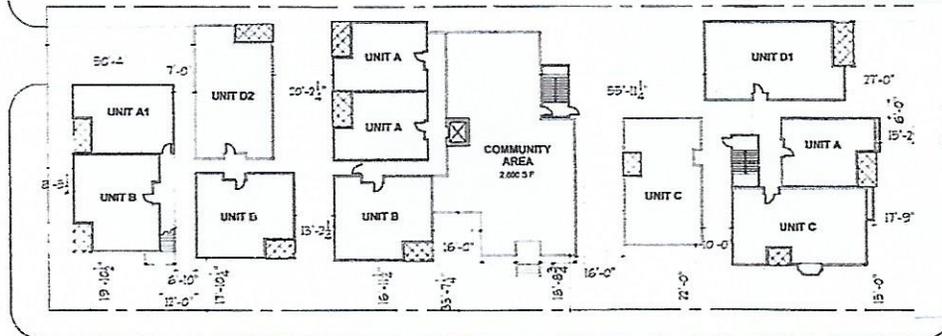
**2-blocks from Project
2323 Scarff Street
Condos: 7-units / 38 beds
Lot 12,568 sq. ft. / 2&3 story
TT-69695-CN / ENV-2008-MND
22 subterranean parking spaces**



2-blocks from Project
 2317 Scarff Street
 Market-rate: 4-units / 14 beds
 Lot 8,886 sq. ft. / 2&3 story
 DIR-2008-3375 / ENV-2008-3376-MND
 10 subterranean parking spaces



BUILDING 1 CRAFTSMAN BUILDING 2 CRAFTSMAN BUILDING 3 DUTCH COLONIAL BUILDING 4 DUTCH COLONIAL BUILDING 5 CRAFTSMAN



4-blocks from Project
 2003 Oak Street
 Affordable: 29-units / 54 beds
 Lot 31,851 sq. ft. / 2&3 story
 DIR-2012-1217-CCMP / ENV-2012-8
 72 subterranean parking spaces

Fiber Cement Shakes
 Asphalt Roofing Shingl



OAK STREET

BUILDING 3

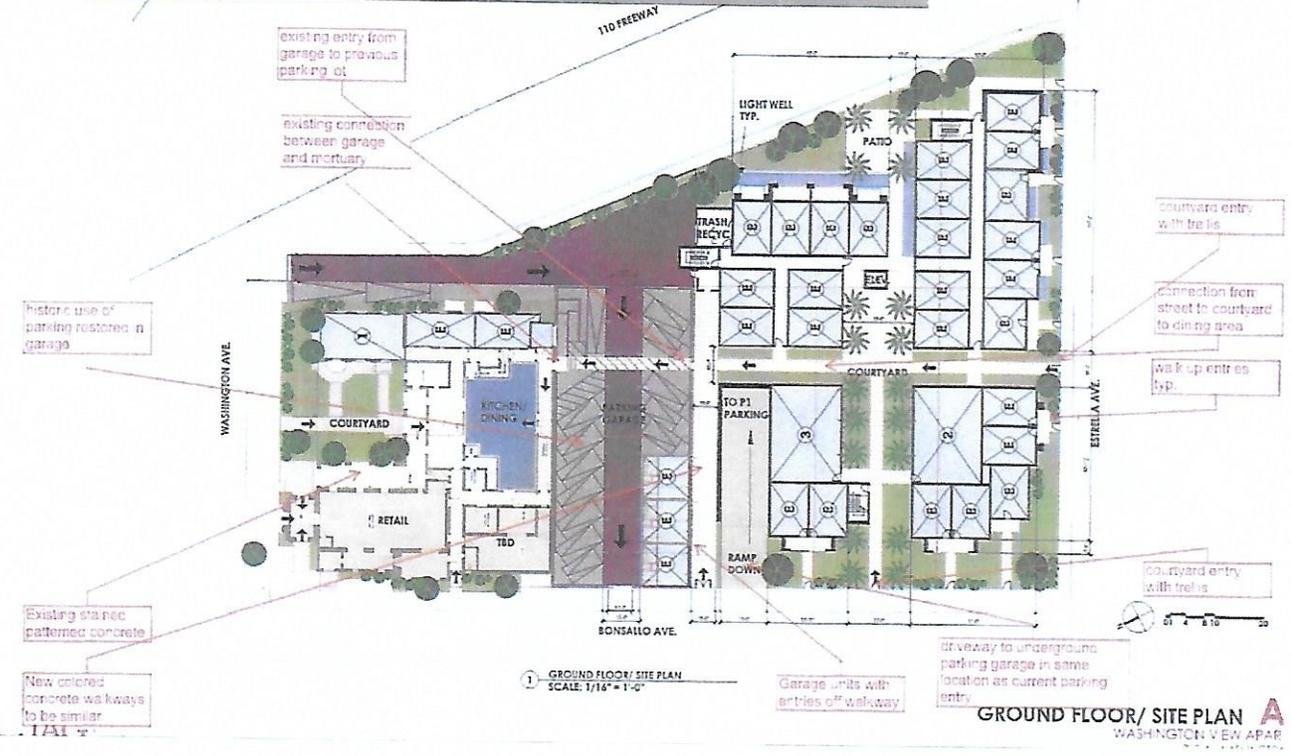
BUILDII



Washington View Apartments
Washington View, TP



6-blocks from Project
720 W. Washington Blvd.
Senior Housing: 115-units
25-beds 90-efficiency
Lot 54,564 sq. ft. / 2&3 story
45 subterranean parking spaces



Although these projects are within the University Park H.P.O.Z. and therefore have defined design requirements, they represent universal compliance resolutions for the Secretary of the Interior's Standard's and Guidelines that both the CRA and the South Community Plan require. These illustrated examples include various representative economic development possibilities all of which have a subterranean parking resolution:

A single-lot, Market rate, 4-unit configuration at 2317 Scarff.

A double-lot, Condominium, 7-unit configuration at 2323 Scarff.

A through block-face, Affordable, 29-unit configuration at 2003 Oak.

A whole-block, Senior, 115-unit configuration.

The applicant states that subterranean parking is both expensive and not a code requirement. These issues alone however cannot justify an approval determination that also mandates design compliance with the complexities of an historic setting. As I have reported the utilization of subterranean parking can easily allow for the immediate reduction in the Project's height incompatibility with the historic setting. The illustrated examples also show variations in a project's height massing, scale, materials and architectural styles, which is another problem this Project creates.

Currently this infill Project is a negative intrusion to the character defining historic streetscape of West Adams Boulevard. It also does not respect the historic streetscape of Severance Street. All new infill building must be compatible with the surrounding historic setting in order to satisfy the still overriding requirements of the CRA/LA Hoover (now Exposition/University Park) Project Area and the Southwest Community Plan.

I ask that the Councilmembers, whatever else they may determine, require that the Project's parking be placed underground were it belongs and reject the Planning Department's improper use of a Categorical Exemption and require that a new environmental study be undertaken that includes evaluation of the ignored negative impacts to the surrounding historic setting.

Thank you for your consideration.

A handwritten signature in blue ink, appearing to read "Jim Childs". The signature is stylized and written in a cursive-like font.

Jim Childs, Chair A.D.H.O.C.
213-748-1656 / jeanjim2341@att.net
2341 Scarff Street, University Park 90007