

## Communication from Public

**Name:** Roland Souza, President, West Adams Heritage Association

**Date Submitted:** 01/18/2020 01:49 PM

**Council File No:** 19-1603

**Comments for Public Posting:** We ask the Councilmembers in the light of numerous omissions and inaccuracies in the record and the substantial evidence making a fair argument of the serious impacts of this project, to support the CEQA appeal and:

- To not accept a categorical exemption;
- To require a factual evaluation of the land use designations under the redevelopment plan
- To initiate design guidelines for compatibility as the South Community Plan requires
- To not certify the CE and commence environmental review



January 18, 2020

Via email and by hand

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: CF 19-1603**

**ZA-2018-2453-CU-DB-SPR-VTT-82114, ENV-2018-2454-CE, 806 W. Adams Boulevard, 758-832 West Adams Boulevard, 2610 Severance**, a for rent 99 unit townhouse project by Champion Development

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

On behalf of the West Adams Heritage Association, a non-profit organization in the area in which this development is sited, I would like to make the following comments and recommendations.

**Environmental Review**

A categorical exemption is not the appropriate level of environmental review for a project that is highly discretionary, is in a historically sensitive environmental, located on a scenic highway, and fails to meet objectives of the community plan and redevelopment plan. There is substantial evidence in the record that supports the existence of serious impacts.

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.

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, within an officially designated scenic highway;<sup>1</sup>

A categorical exemption should not be issued when there are sensitive issues and the project fails to comply with the redevelopment plan and the south community stated objectives. To permit a CE in

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<sup>1</sup> SLA Community Plan -- Aesthetics Chapter of EIR, page 4.1-8 Within the South Los Angeles CPA, the City has designated Adams Boulevard from Arlington Ave to Figueroa Street, as City Scenic Highways.

this case would cause irreparable and irreversible harm to the environment of historic West Adams.

The evaluations of impacts prepared by the developer is based solely on the development site itself and ignores its adjacency to the University Park HPOZ, the North University Park Specific Plan, the Fraternity Sorority Row surveyed history district, numerous historic monuments and its importance as a site within the CRA Redevelopment Project Area.

*This report evaluates the property at 806 W. Adams Boulevard in the City of Los Angeles, California, formerly the John Tracy Clinic (the "Clinic"), for potential historic significance.<sup>2</sup>*

The report, prepared for the developer, did not even pretend to evaluate the setting in which these six dormitory style buildings would be placed nor the secondary or indirect impacts on the numerous historic resources adjacent.

The project is also within a City Scenic Highway (Arlington to Figueroa) which should effect the proposed design.

### **The Proposed Development of the Site as Proposed Has Serious Negative Impacts**

The proposed map is not consistent with applicable general and specific plans which includes the South Community Plan and Redevelopment Plan. It will have a demonstrable environmental effect on the population and land use of University Park/West Adams.

The site is NOT physically suitable for the proposed type of development. It places an incompatible six buildings (plus a recreation building) in the middle of a neighborhood developed over centuries where there are front yards, rear yards, sidewalk offering pedestrian access to individualized buildings whether they are built in at the turn of this century or the last century. The project fails to enhance the character of the existing neighborhood as required by the South Community Plan. The east west orientation is also contrary to Adams Boulevard's significance as a scenic highway.<sup>3</sup>

The site is NOT suitable for the proposed density of development.<sup>4</sup> "The Project's scale and massing, in addition to the podium level add to a development that would not be comparable to any residential project in the immediate area. In addition to the height and massing, though not deviating from the Code, the rooftop amenity would overwhelm those multi-family structures immediately abutting the subject project on Severance Street, as shown on the Overall Elevations of "Exhibit A" (page 16). As such, the finding that the arrangement of the building and associate components of this finding cannot be made."<sup>5</sup>

The Redevelopment Plan requires that to allow for the requested density bonus:

*The "Agency approval of such development shall:*

- 1). Contribute to the revitalization goals of the Plan.*
- 2). Contribute to a desirable residential environment, neighborhood stability, and not adversely impact the neighboring environment.*
- 3). Provide units with adequate living area and avoid excessively dense development.*

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<sup>2</sup> HRG Phase 1, Historic Assessment Report, June 14, 2018

<sup>3</sup> The South Community Plan calls for development that *reinforces the distinctive and historical character of the corridors and the residential neighborhood*, Chapter 3-7

<sup>4</sup> The CRA low medium density designation limits development to 24 units per gross acre -- this is site 2.8 acres. This CRA plan overlay sets the allowed density; RD1.5 is not the allowable density.

<sup>5</sup> Determination Letter, May 17, 2019, Henry Chu, Associate Zoning Administrator

4). *Provide adequate parking.*”<sup>6</sup>

The City is adopting a CRA Takeover Ordinance (CF 13-1482-S3) that transfers the duties of all unexpired Redevelopment Plans to City Planning. This emphasizes the need to understand and implement the requirements of the applicable Plan. The Ordinance provides “*Whenever the Redevelopment Regulations conflict with provisions contained in Chapter 1 of this Code or any other relevant City ordinances, the Redevelopment Regulations shall supersede those provisions.*”

This would also include identifying as a historic resource, “*properties identified as significant per eligibility criteria in SurveyLA and the Community Redevelopment Agency surveys or any subsequent City sanctioned or accepted surveys*” which would include the Fraternity/Sorority Row historic district surveyed by architectural historian Pete Moruzzi for CRA in 2006 and adopted by CRA. “*CRA was required to complete Historic-Cultural Resource Assessment Surveys to determine the condition of those resources and their potential for certification as a historic-cultural resource either individually or collectively. Such a survey was completed by LA/CRA for their Hoover Project Area known now as the University Park-Exposition Park Project Area in 2006.*”<sup>7</sup> The Fraternity/Sorority Row District is directly southerly adjacent to the subject site. We include herein by reference the extensive evaluation of the setting and the historic resources in the ADHOC letter of January 4, 2019, by preservation expert Jim Childs.

### **Parking**

There is substantial evidence in the record that there will be significant parking, traffic, circulation, noise and safety impacts, all of which have been ignored.

*The applicant has referenced USC generated student parking studies to support this minimal amount of parking. The USC parking analysis includes first-year students who have very low rates of automobile ownership. Applying these parking rates to off-campus, privately owned student housing would be improper. If only 40% of the student residents own an automobile, the project will be considerably underparked, resulting in hundreds of vehicles searching for on-street parking in the residential neighborhoods in the vicinity of the project. The resulting congestion and potential increased pedestrian crossings of Adams Boulevard represent a safety risk for the student tenants of the project.*<sup>8</sup>

The Class 32 exemption does not specifically mention child care. However, to qualify for the exemption the project must not have any significant noise or air quality impacts. A child care facility would be considered to be a sensitive receptor for both. The project would likely result in at least a significant noise impact under the City's CEQA thresholds guide. The typical way around the guide, compliance with the noise ordinance, would arguably not work as limiting construction hours at night would not reduce impacts during the day.

### **The NSO**

The project fails to meet the goals of the Neighborhood Stabilization Ordinance (NSO). WAHA was a participant in the creation of the NSO which sought to preserve the neighborhood residential family character. This project inserts an essentially a dormitory style building in the heart of University Park walling off the site from its neighbors with a podium design, completely out of scale with the existing neighborhood of two and three story homes and apartment buildings.

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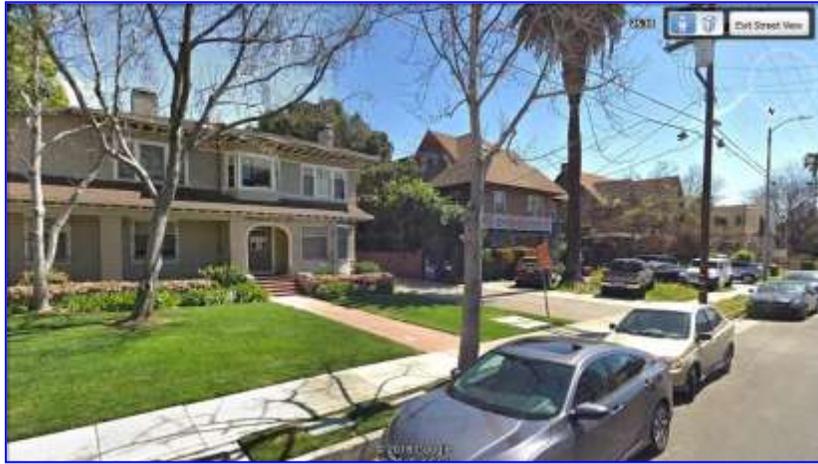
<sup>6</sup> The Redevelopment Plan does allow density bonuses [Sec. 1334], and is not specific as to the percentage. However, the Plan is quite specific as to the circumstances and mandatory requirements under which such density bonuses are to be approved.

<sup>7</sup> ADHOC Letter to the ZA, January 4, 2019,

<sup>8</sup> October 3, 2019 Letter from USC Land Use and Planning Executive Director Brian League

## Compatible Design

Podium parking should not be permitted; it does not substantially exist in University Park; underground parking should be required. All infill in University Park development have buildings sited at grade establishing a relationship with the street and pedestrian friendly. The South Community Plan and the newly adopted plan establishes design criteria that this development ignores.



**Figure 1 Severance Street streetscape (east)**

The material submitted fails in a very basic understanding that it is building within an historic area and seeks preferential bonuses that, at their core, cannot comply with the purpose and intent of the applicable plans and zoning. Whatever is built here needs to reinforce not ignore the community character.

We ask the Councilmembers in the light of numerous omissions and inaccuracies in the record and the substantial evidence making a fair argument of the serious impacts of this project, to support the CEQA appeal and:

- To not accept a categorical exemption;
- To require a factual evaluation of the land use designations under the redevelopment plan
- To initiate design guidelines for compatibility as the South Community Plan requires
- To not certify the CE and commence environmental review

Very Truly Yours

Roland Souza  
President, WAHA c/o 1724  
Westmoreland Boulevard, LA, CA  
90006  
ATT: Scenic Highways



**Figure 2 Detail east side of Severance, the Waters Shaw Family Residence (HCM #884)**



**Map E**  
**Transportation Element of the General Plan**  
**Scenic Highways**  
**In the City of Los Angeles**

- Designated Scenic Highways
- - - - - State Scenic Highway (other jurisdictions)
- Future Alignments Designated as Scenic

**NOTES**

1. An inventory of these designated Scenic Highways is attached as Appendix E to the Transportation Element. Scenic Highway Guidelines are presented in chapter VI of the Transportation Element.



## Communication from Public

**Name:** Laura Meyers, NUPCA Representative to the Hoover-Exposition-University Park Advisory to CRA

**Date Submitted:** 01/18/2020 02:55 PM

**Council File No:** 19-1603

**Comments for Public Posting:** I sat on the Project Advisory Committee to the Redevelopment Plan with jurisdiction over this site from 1989 until the Community Redevelopment Agency's demise. The land use component of the Redevelopment Plan, however, continues to be in effect. The import of that is outlined in detail both in my attached previous letter and also in the Appeal, which has updated information now that the jurisdictional responsibility has transferred from the Successor Agency to the City Planning Department. The basic "rules" for a project within the redevelopment project/plan area have not changed. For a density bonus, several specific findings shall be made (details in the attached letter as well as the Appeal). No one has made any move to do so. Applicant (as far as anyone can see with transparency on the City website) has thus far not applied for the Director's Determination that is required in this case; no staff-led public hearing has been yet held, and no report/determination has been issued. No related CEQA evaluation has occurred. In any case, the required Redevelopment Findings (not yet made) are at odds with a Categorical Exemption, Class 32. I thank the Honorable Members for taking the time to read through this attached material. We are all working toward a better community and we all appreciate how hard you work for us.

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NORTH UNIVERSITY PARK COMMUNITY ASSOCIATION

January 16, 2020

The Honorable Members of City Council and the PLUM Committee  
200 N. Spring St.  
Los Angeles, CA 90012

**RE: Council File No. CF-19-1603**

**Case No. ZA-2018-CU-DB-SPR, VTT-82114**

806 West Adams Boulevard (758-832 West Adams Blvd.), Los Angeles CA 90007

Dear Honorable Councilmembers:

Relative to the Appeal before you on Tuesday, January 21, 2020, I have previously submitted the attached detailed comment letter, as well as selected pages from the adopted Citywide Mobility Plan 2035, An Element of the General Plan, the latter of which clearly indicates that West Adams Boulevard is a city-designated Scenic Highway.

A part of the CEQA process is reliance on factual information, e.g., CEQA must be fact-based. However, Planning Staff has repeatedly denied that which is patently clear (as you can see in the attached Mobility Plan 2035 pages), namely that the Los Angeles City Council adopted (*on September 7, 2016*) the Mobility Plan 2035 which among other things did indeed designate 68 streets and arteries as Scenic Highways, including Adams Boulevard from Figueroa to Crenshaw, and thus for this reason alone a Class 32 Exemption ought not to apply.

Moreover, as I and others repeatedly have made clear, and has been stated in the Appeal, this Project is inconsistent with the Hoover-Exposition-University CRA Redevelopment Plan.

I sat on the Project Advisory Committee to this Redevelopment Plan from 1989 until the Community Redevelopment Agency's demise. The land use component of the Redevelopment Plan, however, continues to be in effect. The import of that is outlined in detail both in my attached previous letter and also in the Appeal, which has updated information now that the jurisdictional responsibility has transferred from the Successor Agency to the City Planning Department.

The basic “rules” for a project within the redevelopment project/plan area have not changed. For a density bonus, several specific findings shall be made (details in the attached letter as well as the Appeal). No one has made any move to do so. Applicant (as far as anyone can see with transparency on the City website) has thus far not applied for the Director’s Determination that is required in this case; no staff-led public hearing has been yet held, and no report/determination has been issued. No related CEQA evaluation has occurred.

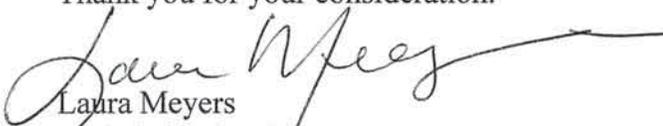
This despite my having brought it to the Planning Staff’s attention via a series of letters, and via public testimony on several occasions.

Indeed, on the morning of the Planning Commission hearing, Staff made the unprecedented action of including an agenda amendment that resulted in the Commission adopting relatively loose language regarding that the Applicant must get a clearance from the CRA (or, now, Planning Department Staff who handle redevelopment) before obtaining a building permit. I do not know why was this treated as an “emergency” under the Brown Act, allowing for a sudden agenda addition, when Staff had known of the issue for many, many months.

In any case, the required Redevelopment Findings (not yet made) are at odds with a Categorical Exemption, Class 32.

I thank the Honorable Members for taking take the time to read through this attached material. We are all working toward a better community and we all appreciate how hard you work for us.

Thank you for your consideration.



Laura Meyers  
On behalf of NUPCA

HOME: 1818 S. Gramercy Place, Los Angeles CA 90019

NUPCA: P.O. Box 15881, Los Angeles CA 90015\*

*\* Please send any notices to both addresses*

· N · U · P · C · A ·  
NORTH UNIVERSITY PARK COMMUNITY ASSOCIATION

December 19, 2018

Department of City Planning, Zoning Administrator  
Nicholas Ayars, Planning Associate  
200 N. Spring St., Room 763  
Los Angeles, CA 90012

RE: **Case No. ZA-2018-CU-DB-SPR, VTT-82114**  
806 West Adams Boulevard (758-832 West Adams Blvd.), Los Angeles CA 90007

Dear Administrators:

NUPCA, the North University Park Community Association, would like to make a few comments regarding this proposed project and its proposed MND.

NUPCA was founded four decades ago with the specific mission and purposes of building community, and protecting both historic resources and the character of the community in the University Park/North University Park neighborhoods. Along with efforts to establish the University Park HPOZ, NUPCA successfully advocated for the establishment of the North University Park Specific Plan and DRB, and also for the creation of the two designated National Register Historic Districts (the Menlo Avenue West 29<sup>th</sup> Street District and the North University Park District).

NUPCA served on the Community Redevelopment Agency's "Hoover" (later Exposition/University Park) Project Area Advisory Committee from approximately 1983 until the Agency's demise. Thus, as a longtime community stakeholder and advocacy organization, NUPCA is a stakeholder in this matter.

We have a few issues to address regarding this proposed 99-unit project.

**The Project Is Inconsistent with the Redevelopment Plan**

First and foremost, we are concerned that there is no mention of the Hoover-Exposition-University CRA Redevelopment Plan. As a land use overlay, it is very much still in place and it governs development within the adopted boundaries of the Project Area – which definitely includes the Subject property. The Applicant failed to mention this, and has not requested any sort of project approval from the Successor Agency. The Planning Department's Staff Report also failed to mention the Redevelopment Plan.

This is important for multiple reasons, not least because the Redevelopment Plan specifically indicates that the Agency (thus, now, the Successor Agency) is the only entity that shall approve a re-subdivision of parcels [Sec. 1333]. While we at NUPCA understand that the current iteration of the CRA Agency doesn't have the staff to be a "lead" agency, certainly if it is the technical jurisdictional entity for any subdivisions within the Project Area boundaries then at minimum a report from that Agency should have been included within the documents to be approved in this case.

Importantly, as a result of ignoring the Redevelopment Plan, Staff and Applicant alike have made a major error in calculating density.

The zoning for the City is RD1.5, which is accurately stated as allowing 82 units (one unit for each 800 square feet) by right on these parcels. But the Redevelopment Plan calculates it differently [Sec. 1305]. For those parcels with a "Low Medium II" land use designation, the calculation is 24 units per gross acre. This property is 2.8 acres, which results in a unit count of approximately 67 (24 + 24 + 19).<sup>1</sup>

A 20 percent Density Bonus for 67 units is 13 or 14 more units, for a total of 81, not 99.

The Redevelopment Plan does allow density bonuses [Sec. 1334], and is not specific as to the percentage. However, the Plan is quite specific as to the circumstances and mandatory requirements under which such density bonuses are to be approved.

*The "Agency approval of such development shall:*

- 1). Contribute to the revitalization goals of the Plan.*
- 2). Contribute to a desirable residential environment, neighborhood stability, and not adversely impact the neighboring environment.*
- 3). Provide units with adequate living area and avoid excessively dense development.*
- 4). Provide adequate parking."*

Findings need to be made that support each of these requirements, noting that these findings would be "and" not "or" for each of the above-listed requirements.

This project will have 495 bedrooms with at least that number of beds (quite possibly, if as built it is like most other student housing projects, twice that number of beds; "beds" is shorthand for "occupants").

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<sup>1</sup> We are aware that in 2005, the California Legislature adopted AB 2805, which changed the name of the Redevelopment Project Area from Hoover to Exposition/University Park, and which was also intended to bring its land use "zones" into more exact concurrence with the City's own zoning. The City adopted an implementation ordinance with amendments on October 11, 2005. However, excepting the name change, this ordinance amendment regarding zoning concurrence never took effect, since it was coupled with another amendment that required that a National Football League team not from California enter into a lease/written contract with the City of Los Angeles to play at the Coliseum. This did not happen while the Agency was still in existence. The current Rams agreement is temporary and is not with the City of Los Angeles.

And yet it will only have 259 parking spaces. It would be difficult at best to make a positive finding that 259 parking spaces is adequate for somewhere between 495 and 990 occupants; the Agency would require that the bed count, not just the bedroom count, be revealed in a complete application.

On the same hand, the sheer number of proposed bedrooms combined with a project submission that does not include floor plans nor written description of, say, living rooms or other common areas within these apartments does not lead to a positive finding that this project provides units with “adequate living area.” It does appear to be an “excessively dense development.”

NUPCA is also not sure a decision-maker could make a finding that this project will contribute to a desirable residential environment or neighborhood stability. How could it? 500-plus students moving in and out annually?

### **Adams Boulevard is a Scenic Highway**

The project as proposed is also inconsistent with the goals established by its Scenic Highway designation. (see the Mobility/Transportation Element of the General Plan). Scenic Highways, according to the Mobility/Transportation Element, “include many of the City’s iconic streets. Preservation and enhancement of these streets and their scenic resources need to be preserved.” Adams Boulevard between Figueroa and Crenshaw is a designated Scenic Highway.

The Project as proposed not only ignores this fact, but turns its new front “face” away from Adams Boulevard – which is not in keeping with the pattern of development along this Scenic Highway – and declares the Adams side (north elevation) a “side yard” with a more minimal side yard setback. Adams Boulevard along this stretch offers generous landscaped front yards with buildings set back anywhere from 15 feet to more dramatic deep setbacks in some cases (and, yes, there are exceptions – but the current built form on the site is NOT one of the exceptions).

This Project should respect the pattern of development AND the Scenic Highway designation and point its face toward Adams Boulevard.

In addition, there should not be a visible parking garage and/or parking podium on Adams Boulevard. This violates every design guideline (Scenic Highway, Community Redevelopment Agency, Citywide Design Guidelines, South Los Angeles Community Plan design guidelines and the General Plan Framework guidelines) on the books. A project like this should have doors and windows at ground level facing Adams (behind a landscaped front yard), inviting pedestrians in – even if the remainder of the project away from Adams is set upon a parking podium.

Ironically, if the Project was properly faced with Adams as its front yard, then there would be no need for the request to reduce the “required back yard” (east elevation of the project) from 15 feet to 12 feet, since the setback requirement would be seven feet.

## **Student Housing Overlay**

NUPCA and the Exposition/University Park Project Area staff and community advisory committee were very involved with the drafting of what is now called the “North University Park – Exposition Park – West Adams Neighborhood Stabilization District.” The broad intention from the very beginning was to discourage new student housing initiatives within the community’s character neighborhoods and instead encourage such development along the Figueroa Corridor (east side of Figueroa, west side of Flower), and to require additional parking that would accommodate the number of occupants in larger projects. The effort was spurred by a proposed project within the CRA boundaries that would erect seven townhouses, each with multiple bedrooms, and each bedroom with multiple beds/occupants, but only requiring 14 parking spaces, per LADBS. Everyone was outraged; on a Planning Department staff training day we brought a busload of planning staff to the site, and soon this NSO ordinance was initiated.

There were years of hearings, and in the end we have the ordinance as written. It requires a Conditional Use Permit (CUP) for any project where there are five or more rooms (not exactly the original intent, but here we are). The stated and intended purpose of the CUP was to require parking that reflects the number of occupants, e.g. a “condition” to be imposed.

However, there is no reference in the Staff Report for this Project to a proposed additional number of parking spaces as a part of the Conditional Use Permit.

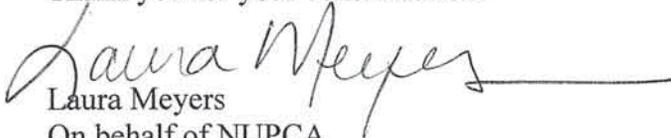
We hope that is an oversight. A project of this density (if this density is to be permitted) should have at least one parking space per bedroom. Although most students would not drive their cars to campus, they do park their cars (albeit for weeks at a time) and need somewhere to do so.

## **This Project is Not Housing for USC Faculty and Staff**

Basically, “grown-ups” do not need five bedrooms and minimal common living areas for their rental apartments. Both faculty and staff members more likely need to live like other working people, with a nice kitchen, dining room, living room, a den/media room/study and usually two bedrooms. This Project is clearly being designed as student housing and should be honest about that fact.

I am sorry that I will not be able to attend today’s hearing, but would like these comments entered into the record.

Thank you for your consideration.

  
Laura Meyers

On behalf of NUPCA

HOME: 1818 S. Gramercy Place, Los Angeles CA 90019

NUPCA: P.O. Box 15881, Los Angeles CA 90015\*

\* Please send any notices to both addresses



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## Citywide General Plan Circulation System Maps

The Citywide General Plan Circulation System maps establish the designated street classifications for arterial streets, scenic highways, divided streets, and depict modified segments as well. Any changes to these street designations would require a general plan amendment.

The first maps that displays all of the arterial streets onto a single map describes the “generalized circulation” meaning that further details such as whether a street is divided, modified, or a scenic highway are not depicted. The following sub-area maps provide a more detailed description of the streets’ complete designation as a divided, modified, or scenic highway in addition to its primary designation as a Boulevard or Avenue.

Scenic Highways depicted within the City of Los Angeles have special controls for protection and enhancement of scenic resources. Scenic Highway Guidelines (for those designated scenic highways for which there is no adopted scenic corridor plan) are presented in the appendices of this Plan. Proposed streets are depicted in the Community Plans, consistent with General Plan standards and criteria (see Policy 3.12 on proposed streets). Community Plans also designate collector streets.

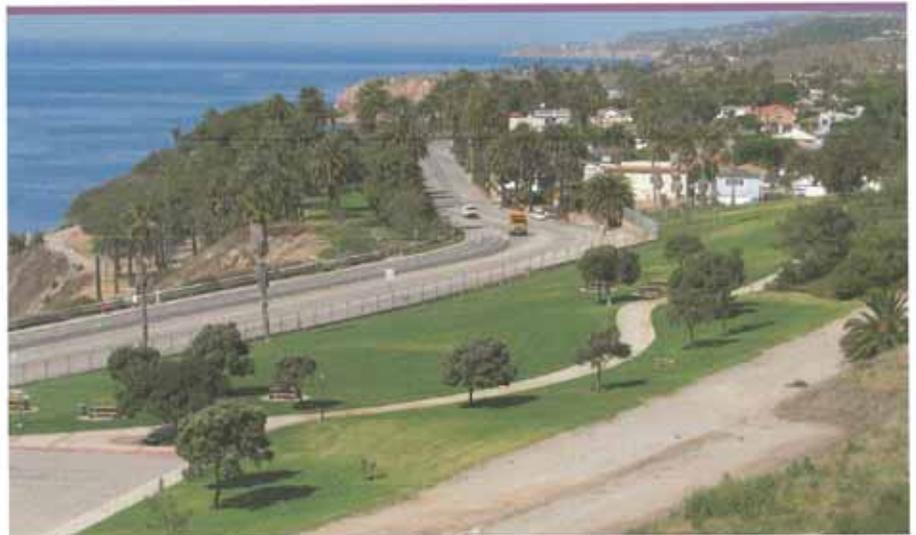
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## 2.16 Scenic Highways:

**E**nsure that future modifications to any scenic highway do not impact the unique identity or characteristic of that scenic highway.

Scenic Highways include many of the City's iconic streets. Preservation and enhancement of these streets

and their scenic resources need to be preserved per the Scenic Highways Guidelines in Appendix B of this Plan.



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# Appendix B: Inventory of Designated Scenic Highways and Guidelines

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## Scenic Highways Guidelines

Corridor Plans for each designated Scenic Highway should be prepared in accordance with each corridor's individual character or concept. These Corridor Plans may be incorporated into specific plan or district plan ordinances. In the absence of such adopted Scenic Corridor Plans, the following interim guidelines are established as part of this Plan:

### 1. Roadway

- a. Design and alignment of a Scenic Highway roadway must include considerations of safety and capacity as well as preservation and enhancement of scenic resources. However, where a standard roadway design or roadway realignment would destroy a scenic feature or preclude visual access to a scenic feature cited in Appendix B of this Plan, design alternatives must be considered through preparation of an environmental impact report.
- b. Design characteristics such as curves, changes of direction and topography which provide identity to individual Scenic Highways shall be preserved to the maximum extent feasible.

### 2. Earthwork / Grading

- a. Grading for new cuts or fills shall be minimized. Angular cuts and fills shall be avoided to the maximum extent feasible.
- b. All grading shall be contoured to match with the surrounding terrain.
- c. In order to negate the environmental impacts of grading in designated Hillside Areas (as depicted on Bureau of Engineering Basic Grid Map No. A-13372), maximum effort shall be made to balance cut and fill on-site.

### 3. Planting / Landscaping

- a. Fire-resistant native plants and trees shall be utilized in any parkway landscaping along Scenic Highways located within designated Hillside Areas.
- b. In designated Hillside Areas, where previous plant material has been washed away or destroyed (due to excessive rainfall, fire, grading, etc.) erosion-controlling plants shall be planted to prevent erosion and mud/land slides. Such Hillside parkways and slope easements shall either be hydro-seeded, or terraced and then planted, with native fire-resistant plants.
- c. Outstanding specimens of existing trees and plants located within the public right-of-way of a Scenic Highway shall be retained to the maximum extent feasible within the same public right-of-way.
- d. Low-growing ground cover and/or shrubs shall be utilized as parkway planting along Scenic Highways in order to avoid blocking a desirable view of a scenic feature listed in Appendix E of this Element. Plant material size at maturity as well as overall scale of plants within the landscaped area must be carefully studied in the site analysis and design stages.

- e. Landscaped medians of Scenic Highways shall not be removed. Such medians may be reduced in width (1) to accommodate left turn channelization within one hundred feet of a signalized intersection; or (2) to accommodate a designated Class II bikeway provided that there is compliance with Guideline 3c above, and that the resulting median width is not less than eight (8) feet.

### 4. Signs / Outdoor Advertising

- a. Only traffic, informational, and identification signs shall be permitted within the public right-of-way of a Scenic Highway.
- b. Off-site outdoor advertising is prohibited in the public right-of-way of, and on publicly-owned land within five hundred feet of the center line of, a Scenic Highway.
- c. A standard condition for discretionary land use approvals involving parcels zoned for non-residential use located within five hundred feet of the center line of a Scenic Highway shall be compliance with the sign requirements of the CR zone.
- d. Designated Scenic Highways shall have first priority for removal of nonconforming billboards or signs. Such priority extends to properties located along, or within five hundred feet of the center line of, designated Scenic Highways.

### 5. Utilities

- a. To the maximum extent feasible, all new or relocated electric, communication, and other public utility distribution facilities within five hundred feet of the center line of a Scenic Highway shall be placed underground.
- b. Where undergrounding of such utilities is not feasible, all such new or relocated utilities shall be screened to reduce their visibility from a Scenic Highway.

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## Scenic Byways Guidelines

Guidelines for Scenic Byways designated in the Community Plans should be established as part of the Community Plan Update or Revision process, with guidelines tailored to local considerations. Such guidelines may be incorporated into the Community Plan text or into a Community Design Overlay (CDO). Guidelines for scenic byway protection and/or enhancement should consider the following aspects:

1. Roadway Design and Alignment
2. Parkway Planting / Landscaping
3. Signs / Outdoor Advertising Restrictions
4. Utilities (e.g. undergrounding of new or relocated utility facilities)
5. Opportunity for Enhanced Non-motorized Circulation

## Inventory of Designated Scenic Highways

Street Name	Alignment	Scenic Features or Resources/Comment
Adams Blvd	Figueroa to Crenshaw	
Avenue of the Stars	Santa Monica to Pico	Wide landscaped median, fountains
Balboa Blvd	1.Fwy. 5 to Sesnon; 2.Victory to Burbank Blvd	Streets should be designed so as to least disrupt the scenic qualities of the area it traverses. Sepulveda Basin, park access
Barham Blvd	Fwy. 101 to Forest Lawn Dr.	Dramatic pass with northerly Valley views
Beverly Glen Blvd.	Ventura Blvd. to Sunset Blvd.	Winding cross mountain road; valley views
Big Tujunga Canyon Blvd.	Fwy. 210 to northerly City boundary	Canyon road with impressive views of rugged mountains
Brand Blvd	Sepulveda to City boundary	Landscaped median
Broadway	98th St. to 112th St.	Wide landscaped median
Burbank Blvd	Balboa to Fwy. 405	Sepulveda Basin, park access
Burton Way	Le Doux Rd to City boundary with Beverly Hills	Wide landscaped median
Coldwater Canyon Dr	Ventura Blvd to City boundary with Beverly Hills	Winding cross mountain road providing access to the Mulholland Scenic Parkway
Colorado Blvd	Eagledale to Monte Bonito	(Specific Plan Ord. No. 168,046)
Crenshaw Blvd	Fwy. 10 to Slauson	
Culver Blvd	Vista Del Mar to Ballona Creek	Ocean and Marina views, Ballona wetlands
Eagle Rock Blvd	NE'ly Verdugo Rd to Colorado Blvd	Landscaped median
Forest Lawn Dr	Barham to Griffith Park Dr.	Winding road past Hollywood Hills; gateway to Griffith Park
Fwy. 5	Fwy. 210 to N'ly City limit	State Scenic Highway
Fwy. 101	Topanga Canyon Blvd to W'ly City limit	State Scenic Highway
Fwy. 118	DeSoto Ave to W'ly City limit	State Scenic Highway
Fwy. 210	Fwy. 5 to E'ly City limit	State Scenic Highway
Glendale Blvd	LA River Bridge to City Boundary with Glendale	Wide landscaped median
Harbor Blvd	Vincent Thomas Bridge to Crescent Ave + future alignment to Shepard St	Views of historic San Pedro and the Port
Highland Ave	Wilshire to Melrose	Landscaped median, significant palm trees
Huntington Dr N	Monterey Rd to E'ly City limit	Wide landscaped median
John S. Gibson Blvd	Harry Bridges Blvd to Pacific Ave	Views of harbor activities, Vincent Thomas Bridge
La Tuna Canyon Blvd	Sunland Blvd to Fwy. 210	Views of ranches in Verdugo Hills
Laurel Canyon Blvd	Ventura Blvd to Hollywood Blvd	Winding cross mountain road through rustic area

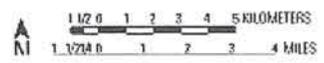


**Map E**  
**Transportation Element of the General Plan**  
**Scenic Highways**  
**In the City of Los Angeles**

- Designated Scenic Highways
- State Scenic Highway (other jurisdictions)
- Future Alignments Designated as Scenic

**NOTES**

1. An inventory of these designated Scenic Highways is attached as Appendix E to the Transportation Element. Scenic Highway Guide Lines are presented in chapter VI of the Transportation Element.



## Communication from Public

**Name:** Adams Severance Coalition, Ed Conery  
**Date Submitted:** 01/18/2020 03:28 PM  
**Council File No:** 19-1603  
**Comments for Public Posting:** The Adams Severance Coalition submits to you the expert analysis provided by USC to the Zoning Administrator and the City Planning Commission which demonstrates the serious parking, traffic, circulation, design and incompatibility issues inherent in the project as currently proposed.



July 31, 2019

Etta Armstrong  
Commission Executive Assistant  
South Area Planning Commission  
200 N. Spring Street, Room 272  
Los Angeles, CA 90012  
apcsouthla@lacity.org

*Via Email and Hand Delivery*

**RE: ZA-2018-2453-CU-DB-SPR, ENV-2018-2454-CE (Agenda Item 6)**

Honorable Commissioners of the South Los Angeles Area Planning Commission:

After careful review of the above-referenced proposed project, the Zoning Administrator denied the Site Plan Review (“SPR”) component of the project. This denial was based on the Zoning Administrator’s finding “*that the arrangement of buildings and structures will be compatible with existing and future development on adjacent and neighboring properties cannot be made*”. The University of Southern California agrees with the Zoning Administrator’s finding. We remain concerned that the proposed student housing project located at 806 West Adams is out of scale with the surrounding residential neighborhood and lacks adequate on-site automobile parking to meet the parking demand that will be generated by its student tenants.

***The Proposed Project is Purpose-Built Student Housing***

The proposed project consists of 99 five-bedroom, four-bathroom apartment units, with each bedroom designed to house two students. As currently configured, the project could easily accommodate over 900 students. The proposed project includes 259 parking spaces. If only 40% of the student residents own an automobile, the project will be considerably under-parked, resulting in hundreds of vehicles searching for on-street parking. Although the project applicant has added additional bicycle spaces and scooter parking spaces to its design, the fact remains that there is still inadequate parking for the project.

***The Project is Incompatible with the Surrounding Neighborhood***

The proposed project consists of a podium with three levels of housing above an on-grade parking deck. This building type is not compatible with the surrounding neighborhood. The City’s design guidelines specify pedestrian oriented development with doors and

July 31, 2019

Page 2

windows on the ground floor. In addition, Adams Boulevard is a City designated Scenic Highway. The current design is incompatible with the Scenic Highway designation and surrounding properties, which have a significant setback from Adams Boulevard. Despite being advised of this incompatibility, the project applicant has not proposed any changes to resolve this issue.

***The Proposed Project does not Comply with Standards Set by the University Park Neighborhood Stabilization Ordinance***

The proposed project is located within the boundaries of the University Park Neighborhood Stabilization Overlay (“NSO”) ordinance. The intent of this ordinance was to protect campus-adjacent neighborhoods from large-scale, purpose-built student housing developments and under-parked projects. One of the tools of the NSO ordinance was to require projects to be subject to a Conditional Use Permit to allow for appropriate community and City review and to ensure that adequate parking was included in the development to meet student demand. Unfortunately, a newer State Density Bonus law now prevents the City from requiring the additional parking imposed by the NSO. As such, the proposed project’s expected parking demand substantially exceeds the proposed parking, and the project applicant has made no provision to provide additional on- or off-site parking.

The University welcomes and encourages responsible, appropriate third-party development of student housing in the area surrounding campus. We are disappointed that the project applicant has not made sufficient changes to its design, in particular its parking, to address or resolve the issues raised above. We respectfully request that the South Area Planning Commission uphold the Zoning Administrator’s denial of the Site Plan Review component of the project.

Sincerely,



Brian C. League  
Executive Director, Land Use and Planning

cc: Henry Chu, Zoning Administration  
Council District 9



January 10, 2019

Mr. Henry Chu  
Zoning Administrator  
200 N. Spring Street  
Los Angeles, CA 90012

*Via Email*

**RE: ZA-2018-2453-CU-DB-SPR (806 West Adams Blvd)**

Thank you for agreeing to leave the public record open on the proposed project located at 806 West Adams (the "Project"), in response to the North Area Neighborhood Development Council's request.<sup>1</sup> On January 9, 2019, the applicant and its legal representatives met with the University of Southern California ("University" or "USC") to present and discuss the Project. At this meeting, USC raised a number of concerns regarding the Project and emphasized that, as currently designed, we do not believe the Project is compatible with the neighborhood. Our most notable concerns are as follows:

- **Parking:** The applicant represents that they have not made a decision regarding the number of residents who may be accommodated in the project. However, the floor plans provided for review in our meeting with the applicant indicate two beds per room and four bathrooms per five-bedroom unit, indicating the applicant's ability to pursue maximum occupancy. Accounting for some single-occupancy premium rooms, residential advisors in single rooms and perhaps a few non-student rentals, the Project is likely to accommodate upwards of 800 students. The Project includes 259 on-site parking spaces. We believe the majority of students living in this project would own cars, based on our experience with students living in off-campus student housing. The cars not parked on-site would need to park in the adjacent neighborhood, materially impacting an already-congested street parking scenario.
- **Neighborhood Compatibility:** The five-bedroom unit configuration is a typical student housing model and not compatible with the one to two-bedroom multifamily apartment buildings in the vicinity of this location.
- **Design:** The podium design on the "L" shaped lot maximizes the ground floor lot coverage and leaves almost no open area at the ground level.

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<sup>1</sup> The University has reviewed the letter submitted by the North Area Neighborhood Council regarding the Project and concurs with the concerns set forth therein.

As you are aware, the area north of the USC University Park Campus is included in the Neighborhood Stabilization Overlay (“NSO”) ordinance. The intent of this ordinance was to protect campus-adjacent neighborhoods from large-scale, purpose-built student housing developments; insufficient project parking was a driving factor behind the intent of the ordinance. Accordingly, one of the tools of the NSO ordinance was to require projects to obtain a Conditional Use Permit to allow for appropriate community and City review and to ensure that adequate parking was included in the development to meet student demand. Unfortunately, a new State Density Bonus law prevents the City from requiring additional parking to meet this Project’s expected demand, and the applicant has made no provision to provide additional on- or off-site parking.

In discussion with the applicant and its legal counsel, the applicant acknowledged hearing our concerns and indicated they would respond to the University in the next few weeks. We believe this site represents an exciting development opportunity and, with the proper design, it could contribute positively to the community. The University welcomes third party development of student housing, but also wants to ensure that the development is responsible, complies with the NSO ordinance, and will be attractive to both the students and our surrounding community.

The University is aware of the January 10, 2019 deadline to submit comments on this Project. Regrettably, this deadline does not allow for the applicant to respond to the concerns we discussed on January 9<sup>th</sup>. We welcome working with the applicant to improve the Project. However, in absence of a formal response from the applicant to address these concerns, the University believes the Project as currently designed is not compatible with the neighborhood, would have a significant detrimental parking impact on the neighborhood and would result in a detrimental concentration of large-scale campus-serving housing in location not suitable for this type of development. We therefore respectfully request that the City Planning Department deny the Conditional Use Permit (ZA-2018-2454-CU-DB-SPR).

If the applicant is willing to extend the time frame for the public record to remain open and can present a more favorable Project addressing our concerns, the University would be willing to withdraw this letter from the public record.

Sincerely,



Brian C. League  
Executive Director, Land Use and Planning

cc: Nicholas Ayers  
Council District 9

## Communication from Public

**Name:** Adams Severance Coalition Ed Conery  
**Date Submitted:** 01/18/2020 12:10 AM  
**Council File No:** 19-1603  
**Comments for Public Posting:** There is a lack of respect for the context in which this proposed 99 unit 5 bedroom project is to be placed. Here are some visual aides to show the remarkable historic setting. Environmental review is critical to achieve a compatible development.

City Clerk, Room 395, City Hall  
200 N. Spring Street  
Los Angeles Calif. 90012

**COUNCIL FILE 19-1603**

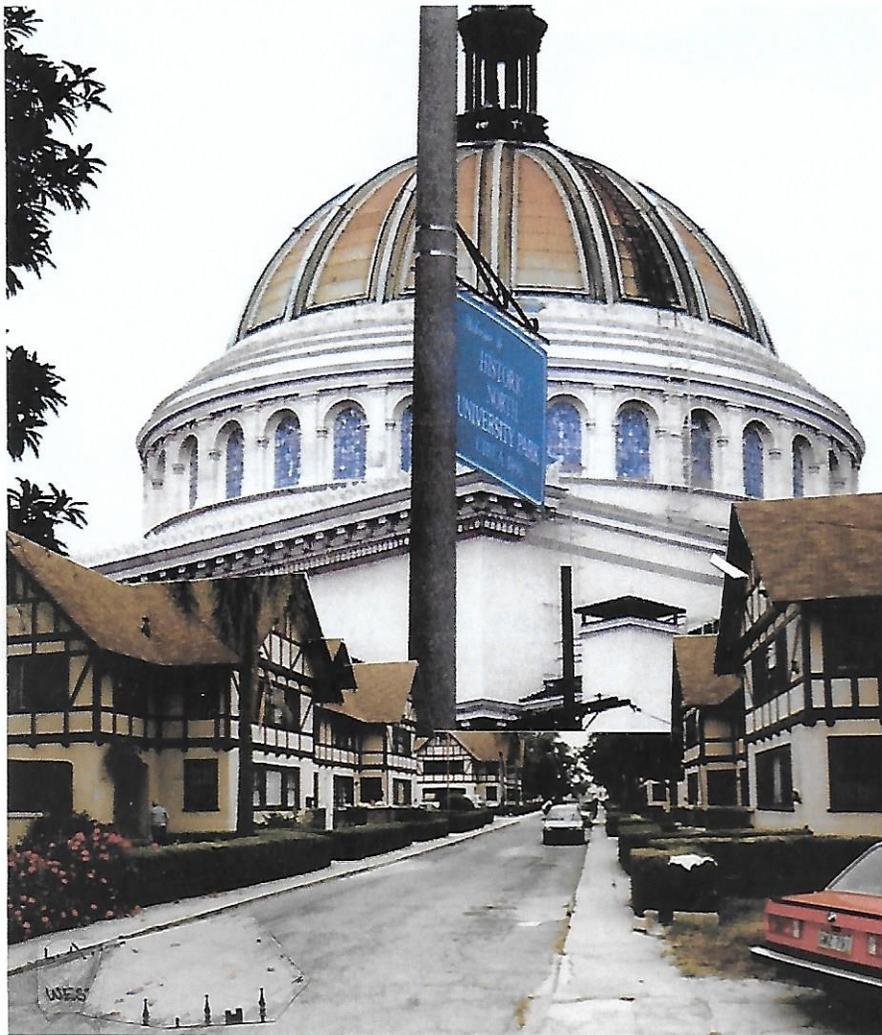
Case No. ZA-2018-2453-CU-DB-SPR-1A  
ENV-2018-2454-CE

Council District 9  
Project Site: 758-832 West Adams Boulevard  
2610 South Severance Street  
Planning Staff, Nicholas Ayars / 213-978-1074  
nicholas.ayars@lacity.org

**PUBLIC HEARING:** Tuesday, January 21, 2020  
Planning & Land Use Management Committee  
City Council Chamber Room 340  
City Clerk Staff, Rita Moreno / 213-978-1074  
Clerk.plumcommittee@lacity.org

**Project Description:** 183,150 square feet  
99 five-bedroom apartments  
7 four-story buildings  
259 vehicle parking spaces  
Podium parking structure

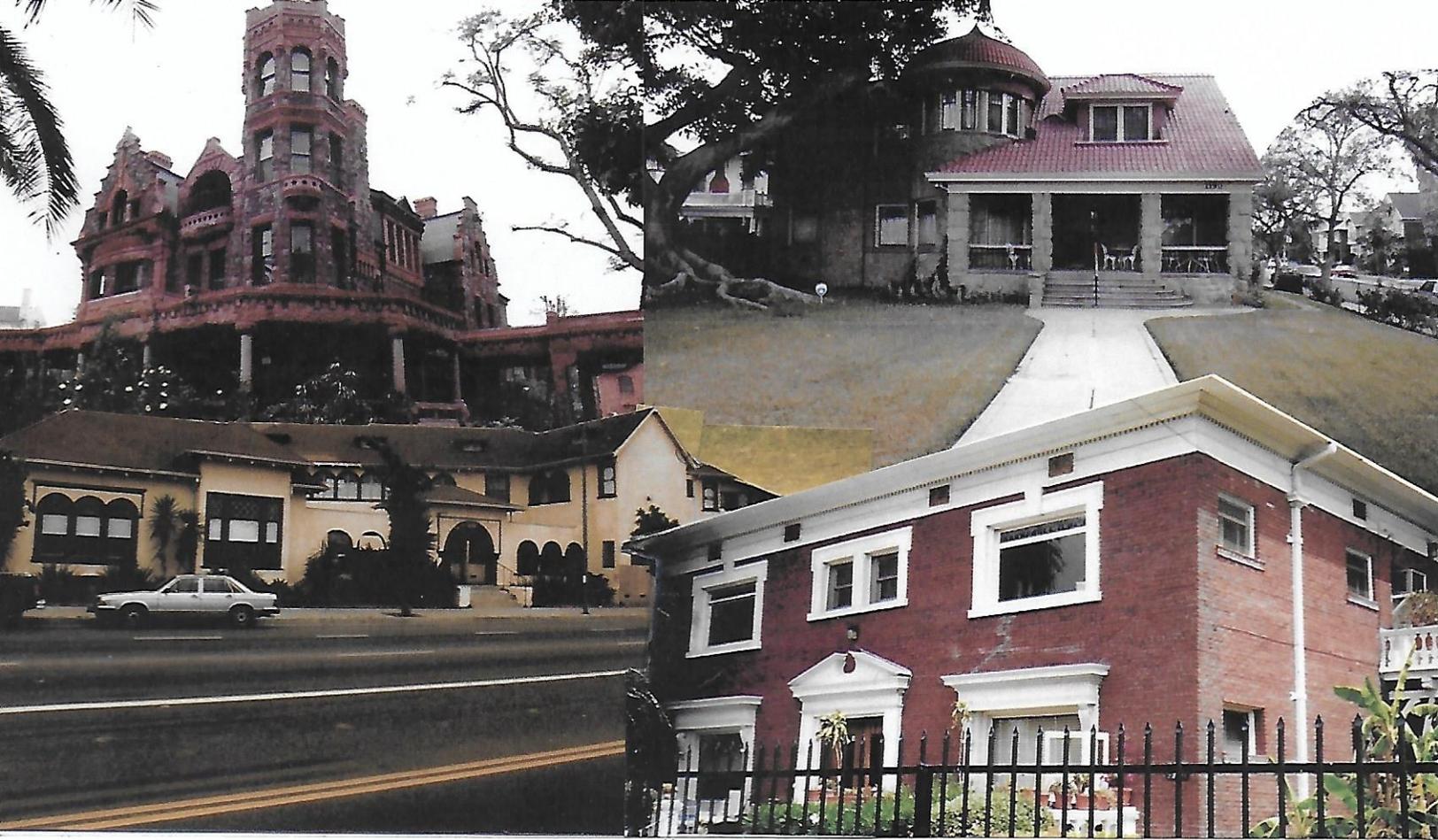
**APPEAL:** Jim Childs  
North University Park Community Association



Honorable P.L.U.M. Committee-members,

Throughout the our City's administrative processing of the above referenced Project I have become more disillusioned and concerned about the lack of respect and disregard of the importance of the existing historic resources affected by the proposal's non-compatible design and its negative impact on our historic resources. Although Planning Staff, Zoning Administer and the Central Planning Commission have received numerous letters justifying concerns and supplying significant data in support of their opposition, there has only been entrenched support for your unsustainable decisions in response. I am therefore, optimistically, offering some visual aides in the hope of opening your eyes to a remarkable historic setting since you fail to hear our pleas.





The photo illustrations of the historic properties in this letter are all located in a 1,500-foot radius of the subject property. The area is roughly Figueroa Street on the east and Hoover Street on the west. ALL of these historic properties are designated Los Angeles Historic-Cultural Monuments. They are All also listed on the federal National Register of Historic Places. This includes: the St. James Park National Register Historic District, the Chester Place National Register Historic District, the North University Park National Register Historic District, and the USC Fraternity & Sorority Row National Register Historic District (eligible). Additionally ALL historic properties are located in either the City's: University Park Historic Preservation Overlay Zone (H.P.O.Z.), the North University Park Specific Plan, or the LA/CRA Hoover redevelopment Plan.





**PRESERVE**  
**COMMUNITY**  
NORTH UNIVERSITY PARK  
COMMUNITY ASSOCIATION  
**A·D·H·O·C**  
**WAHA**  
ADAMS - SEVERANCE  
COALITION

North University Park, in addition to the dozens of Los Angeles Historic-Cultural Monuments, and scores of National Register listed buildings has hundreds of historic Contributing Structures in the HPOZ and Specific Plan. The City has irresponsibly approved placing 7-non-conforming 4-story student housing buildings in the very heart of this sensitive habitat. Approved with a Categorical Exemption, this action must be reconsidered and with an appropriate CEQA designation.

Ed Conery, Adams-Severance Coalition  
P.O. Box 15881, LA CA 90015

