

## City Living Realty

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*Specializing in Historic and Architectural Homes*

July 29, 2021

Honorable Members of the Los Angeles City Council

Members of the Los Angeles City Council Planning and Land Use Management Committee

200 N. Spring Street

Los Angeles, CA 90012

*RE Council File: 19-1603-S1*

*ENV-2018-2454-CE, DIR-2020-4338-RDP*

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

Dear Honorable Council Members,

I have been a resident, business owner and property owner in the West Adams District for 35 years. I am the owner and broker of City Living Realty, a local residential real estate company. I am opposed to this plan as it has been presented. It is overly dense, disrespects the streetscape of Adams Boulevard (a Scenic Highway), and is clearly NOT a development designed for faculty and staff, despite claims to the contrary.

In light of the proposed density and massing, which will have impacts relative to the streetscape of a city-designated Scenic Highway, on traffic, and potentially on noise, it is clear that the proposed Project at 806 West Adams Boulevard is not eligible for a Categorical Exemption from CEQA under Class 32 nor other categories.

It also does not meeting the Redevelopment Plan guidelines for a density bonus, and therefore (since there is a land use conflict) it also doesn't qualify for a Categorical Exemption.

As a part of my business in the sales of historic area properties, representing both buyers and sellers, I have significant experience with USC-related faculty purchases of homes in the area. I also have experience with both faculty/staff and student housing projects in the area. Some years ago, I represented the University of Southern California in the sales of units in its faculty/staff condominium housing project. More recently I have worked with student housing providers on their acquisitions of properties in the campus area. Also, I have served for over 17 years on the University Park HPOZ Board which provides design review on the north side of Adams Boulevard and for the residential and commercial neighborhoods north to Washington Boulevard.

I have previously made most of these same comments on this project, but they bear repeating.

It seems disingenuous and misleading for this Applicant to claim that the intended primary occupancy is for USC employees and faculty. Based on my knowledge and experience, the demographic of USC employees/staff and faculty is certainly not the primary market for five-bedroom units, rental or condo. This claim of USC faculty/staff housing would be more believable if the units were spacious, two-bedroom-plus-den or three-bedroom units, with substantial living/dining/kitchen areas befitting occupancy by a professional single/couple or a typical family.

But what this development proposes are five-bedroom units with much smaller than normal kitchen/living/dining spaces, and that is exactly what student housing developers in this area build to maximize rental streams, with rents often calculated at a per bedroom or even per bed rental rate.

Importantly, the design of the project is very inappropriate for Adams Boulevard, which was developed as an attractive residential streetscape and remains an important boulevard for the neighborhood. The proposed visible parking structure/podium at ground level and covering the entire site is unattractive and unfriendly, with perhaps an intentional “keep local pedestrians away from me” feel. At a minimum, fully below ground parking should be required along Adams and Severance.

The Project Description states: “the Project would introduce a modern and attractive multi-family residential development that would blend seamlessly into an established neighborhood.” But this is NOT remotely true. The architectural style and massing of this project, almost lot line to lot line, with minimal setbacks, is very bulky and thus the design is NOT sympathetic to the pattern of development along Adams Boulevard. The fact that the project as designed declares Severance as the “front yard” (e.g., with the required 15-foot setback) and Adams Boulevard as its “side yard” (e.g., with a 7-foot setback) means that it does not “blend seamlessly” with properties along Adams. Indeed, it relegates Adams Boulevard to a minimal setback, garage in your face, side yard.

The “Open Space” plan purporting to show open space/green space actually shows almost no open space and very little setback landscape area, most importantly along the most significant frontage of Adams Boulevard. This is an excessively dense, intensive and intrusive development. Please study the “Second Level Landscape Plan” which shows rows of very large multistory buildings with narrow corridors between them, with minimal planted areas. And as mentioned above, the Plan indicates only a seven foot planted setback area from the Adams Boulevard sidewalk.

Adams Boulevard is a designated “Scenic Highway.” It is the namesake for the Historic West Adams area. Its development pattern included wide setbacks from the street and architecturally distinctive properties. Even in 2018, nearly 120 years later, most properties still respect the setback. Adams Boulevard is not a “side yard” street.

This stretch of Adams Boulevard, from Figueroa to Hoover, comprises one of the most concentrated areas of significant landmark properties in the entire City of Los Angeles. These properties include the impressive Auto Club building and St. Vincent de Paul Church at Adams and Figueroa, multiple original Adams Boulevard estates adaptively reused and under excellent stewardship by Mount St. Mary's University, Chester Place including the Doheny mansion and other mansions comprising the main campus of Mount St. Mary's University, the Kerckhoff mansion owned by USC and adaptively reused as offices, the Stimson/Bilicke mansion adaptively used as affordable housing and recently restored, the Christian Science Church adaptively reused as a meditation center, and the historic Casa de Rosas compound at the SE corner of Hoover and Adams scheduled for reuse as housing for veterans and their families.

All of these buildings add to the presence and importance of Adams Boulevard while managing to respect setbacks and to maintain reasonable density.

Additional housing is critical for Los Angeles. Clearly new projects are to be going to be more dense than their predecessors. But projects should be respectful of their surroundings and be sympathetic to the other existing properties.

Unfortunately, this project as currently planned seems disrespectful to Adams Boulevard and its neighboring properties, seems overbuilt for its lot, and seems to be seeking support by falsely describing its target market and thus its purpose. It is clearly targeting student rentals given the emphasis on five bedrooms per unit. If this is a student housing development, then be honest about it and in addition to a critical review of the proposed density, open space and setbacks please also analyze whether this project appropriately meets requirements for student housing in the area, and not give the project support based on its claim to provide needed housing for Los Angeles families and USC faculty and staff.

Please reject the CEQA clearance of a Categorical Exemption for this Project, and please reject the Project until it is significantly rethought and redesigned.

Thank you for your consideration.

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