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NORTH UNIVERSITY PARK COMMUNITY ASSOCIATION

July 31, 2021

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

RE: Council File No. 19-1603-S1
ENV-2018-2454-CE, and related case DIR-2020-4338-RDP
806 West Adams Boulevard (758-832 West Adams Blvd.), Los Angeles CA 90007

I am writing this cover letter on behalf of NUPCA, the North University Park Community Association, which continues to support the appeal before you by West Adams Heritage Association (WAHA).

I served on the Community Redevelopment Agency's Hoover/University/Exposition Park project advisory committees (PAC and CAC) for approximately 25 years, first as an elected member and then as an appointed member (appointed by Council Member Mark Ridley-Thomas, when he served at Council District 8). I consider myself to be very knowledgeable as to the application of the Redevelopment Plan requirements ("Findings") to specific projects, because that is what I and my fellow committee members did for all those years.

I have been communicating specifically regarding this case to the City Planning Department staff, the Los Angeles City Planning Commission, the South Los Angeles Area Planning Commission, and Los Angeles City Council since 2018, via public testimony (in person and virtual), emails, and letters for more than three years, each time mostly regarding how the Redevelopment Plan Findings apply in this case, and also stating (over and over again) that the Applicants were required to present their request for a Density Bonus to the CRA's Successor Agency. Applicants refused to submit their project/case before the jurisdiction was transferred to the City of Los Angeles, and even after the transfer, Applicant did not do so in a timely manner. I have attached a collection of 6 of my letters, dating from 2018 through this past June, 2021, for your "reading pleasure."

A few bullet points about the matter before you now:

- Although this is a CEQA Appeal, you have not only a right but also a DUTY to review the entire case. That is because the underlying case involves whether or not the required Density Bonus Findings were appropriately made by Staff. (I do not believe so.) If the Findings were not correctly made, then a Land Use Conflict is created, thus rendering the Categorical Exemption an impermissible clearance to utilize.
- The Findings were not proper. In the Redevelopment Plan language, there is clarity that the Agency or now the City is not required to approve a density bonus unless 1). A project is not

overly dense (this one will house, apparently, about 1,000 students); 2). That there is adequate parking (for both CEQA and for the Redevelopment Plan, “adequate” is not defined by minimum code requirements but rather an assessment of whether or not 255 parking spaces actually would be adequate for 1,000 occupants – is there evidence that a parking ratio of about 1 space for every FOUR tenants is adequate?); and 3). As a student housing project, this project does NOT “satisfy the needs and desires of the various age, income and ethnic groups of the community” and therefore does not contribute to the revitalization goals of the Redevelopment Plan.

- Applicant complains that there have been too many hearings. But the Applicant had refused to file this case when the underlying case was filed. The Planning Commission included a condition that Applicant to file the case, though Applicant still did not. The City Council ADOPTED the City Planning Commission’s Determination and Conditions in that underlying 2020 case, thus requiring a Redevelopment Plan Approval.

This project is entirely incompatible with the City’s previously adopted land use initiatives, specifically including the Figueroa Corridor General Plan Amendment that increased allowable units/zoning density and FAR on Flower and Figueroa, at the same time adopting a policy that student housing should NOT be located in the historically-sensitive neighborhoods of University Park. It is also incompatible with the Adams Boulevard Scenic Highway; it relegates the Adams Boulevard north elevation to being a “side yard” with very little setback versus the prevailing setback in the neighborhood. These and other arguments have been made all along by diverse organizations including SEIU, UNIDAD, and the University of Southern California, along with numerous neighbors.

I thank you for your time, and urge you to please uphold the Appeal and require that this Project undergo an EIR process that would also explore alternatives, perhaps resulting in a Project where the required Redevelopment Findings could also be made.

Thank you,

Laura Meyers
323-868-0854
lauramink@aol.com

Collection of previous letters submitted by Laura Meyers, on behalf of the North University Park Community Association, in date order (oldest last), first letter written in December, 2018; most recent in June, 2021.

1).

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NORTH UNIVERSITY PARK COMMUNITY ASSOCIATION

June 15, 2021

TO: South Area Planning Commission
200 North Spring Street, Room 272
Los Angeles, CA 90012
via email: apcsouthla@lacity.org

RE: DIR-2020-4335-RDP, 806 West Adams Boulevard (758-832 West Adams Blvd.), Los Angeles CA 90007

Honorable Commissioners;

NUPCA, the North University Park Community Association, continues to support the appeal before you by West Adams Heritage Association (WAHA).

The only reason I am writing this letter/memorandum – since none of the facts have changed – is to express my utter SURPRISE and DISMAY at the newest letter/tactic submitted (on June 11, 2021) by the Applicant through its representatives, DLA Piper/Andrew Brady.

Mr. Brady wrote you to complain that there have been “too many” hearings in this matter. Yet on April 1, 2021, Applicant’s representatives specifically admitted that there had never been a public hearing on the matter before us in this Appeal, namely the requested variation from the Exposition/University Park Redevelopment Plan. The April 1 letter was lengthy, but essentially Mr. Brady argued, on page 1, that “**No Public Hearing Was Required Prior to the Issuance of the Director’s Determination.**”

And **no public hearing was held**. This appeal, in part, was to request that the Director hold what Appellant (and also other community stakeholders, including NUPCA) believe is a required hearing that allows members of the community to record their concerns and opinions before the Director issues not just a Determination but also Findings to support the letter of the Redevelopment Plan (e.g., “law”).

So it is ironic at best, but seemingly more calculated and strategic, for Applicant to now claim the number of public hearings has exceeded the law.

The primary reason that we are here at all is that Applicant refused to file redevelopment compliance case in a timely manner. This appears to be rather purposeful, a way of avoiding going before the Successor Agency to the Community Redevelopment Agency, and simply waiting until jurisdiction

transferred to the Los Angeles Department of City Planning, where it seems Applicant knew it would be an easier path.

It was a long wait.

This Commission may recall that on August 6, 2019, where the underlying case (ZA-2018-2453-CU-DB-SPR-1A) was initially scheduled for a hearing, I testified at some length about the requirements of the Redevelopment Plan and questioned WHY Planning staff was not requiring Applicant at that time to apply for and receive the required Redevelopment clearances before proceeding with the case. The matter was sent to the City Planning Commission (because it was a density bonus case) and the South Los Angeles Area Planning Commission did not take an action. But I want to put that date forward again: **August 6, 2019**.

Applicant did not submit anything to the Successor Agency. At the time the underlying matter finally went to City Council, staff scrambled literally on the morning of the hearing to amend the agenda (without even 24 hour notice required for “emergencies” under the Brown Act, another state law) to require that Applicant does get the clearance related to the Redevelopment Plan.

This was before COVID. So at that point, Applicant had been on public notice for at least six months that there was a still-extant Redevelopment Plan, and that a “variation” (variance) from the Plan was required, with Findings. Nonetheless, Applicant waited FIVE MORE MONTHS to comply with City Council’s action and submit that application, which is the NEW CASE we are dealing with today.

There have NOT been more than five hearings on this matter. This does not violate SB330. My perception – perhaps this is the public’s perception – is that Applicant’s representatives purposely and knowingly delayed their application for the Redevelopment case to 1). Avoid presenting to the Successor Agency, which does understand the Redevelopment Plan; and 2). To avoid a public hearing.

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 29th 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.

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.*

2).

Laura Meyers
1818 South Gramercy Place, Los Angeles CA 90019
email: lauramink@aol.com; cell phone: 323-868-0854

April 20, 2021

Honorable Commissioners,
South Los Angeles Area Planning Commission

Comment letter via email to APCsouthla@lacity.org

RE: Agenda Item No. 5

Case No. DIR-2020-4338-RDP-1A and ENV-2018-2454-CE

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

Dear Honorable Commissioners:

I have a great deal of experience with the former “Hoover” ~ Exposition/University Park Redevelopment Plan. I (on behalf of NUPCA, North University Park Community Association) was elected to and then sat on the Project Advisory Committee (PAC) to this Redevelopment Plan from 1989 for about two decades, and then was appointed to the PAC’s successor entity, a “CAC” (Community Advisory Committee) by Councilmember Mark Ridley-Thomas, then of CD8. In that role, I sat with (in monthly public meetings/hearings) representatives from the University of Southern California, Exposition Park/Coliseum Commission, the Figueroa Business Improvement District, and other business and residential representatives until the Community Redevelopment Agency’s demise.

The land use component of the Redevelopment Plan, however, continues to be in effect. I and others have testified and written numerous comment letters previously regarding how being within the footprint of this Specific Plan (e.g., the Redevelopment Plan) should impact decision-making for projects proposed within the Redevelopment Plan boundaries. Specifically, although the jurisdictional responsibility has transferred from the Successor Agency to the City Planning Department, the Redevelopment Plan remains intact as written.

This is a REBUTTAL comment letter to both certain staff statements which are not factual, and Applicant statements, which also are not factual.

1). The notion that a public hearing is not required, or only required in the case of an appeal, does not have merit. Starting on page 6 of the staff report for CPC-2018-6005-CA, the basis for the transfer of authority, Planning Staff lays out the review procedures for four types of cases. One is ministerial, three are discretionary. No one is arguing that this case is not discretionary. What the procedures state is that there will be a “Notice of Public Hearing.” And that “The Director shall provide any notice required by the applicable Redevelopment Plan regulations.” What the Redevelopment Plan says is that “The Agency [substitute Director of Planning] is authorized after the review and recommendations of the Project Area Committee [since the PAC did this at Brown Act compliant public meetings and at these held hearings and took testimony, substitute “public hearing”], to permit variations from the limits, restrictions and controls established by the Plan....”

For further clarity, the Agency Board would then conduct public hearings, before issuing a Determination. The expectation of this language is there are *public hearings before appeals are filed*.

2). Nicholas Ayers of the Planning Department confirmed that in an email to me (and Appellant Jean Frost) dated Tuesday, Nov. 5, 2019. It is improper for Applicant to refer to this as a “*purported*” email. Staff has the email in their possession.

3). To approve the Density Bonus (whatever the number of units approved) all Findings must be made. Not interpretations. Not in light of new laws (although, yes, these are pertinent, but not to the Findings). More pertinent than new State law on density bonuses is that for the Redevelopment Plan the Finding must be made that the project must avoid excessively dense development. Remember, this is to avoid a negative impact on a community defined as “blighted.”

Reviewing the established and adopted Redevelopment Plan Goals sheds light on what that means. It is stated in the Redevelopment Plan that new housing projects are “to make provisions for housing as required to satisfy the needs and desires of the various age, income and ethnic groups of the community, maximizing individual choice” AND “to alleviate overcrowded, substandard housing conditions and to promote the development of a sufficient number of affordable housing units for low and moderate-income households.”

As a student housing complex, this project meets neither goal. It should be clear that the set-aside affordable units would be uncomfortable at best for a “low or moderate-income household” (e.g. family) surrounded by raucous students and without living rooms or dining rooms for the families in question.

4). Adams Boulevard from Figueroa to Crenshaw is a locally-designated Scenic Highway. WHY are we still arguing about this? The adopted *Citywide Mobility Plan 2035, An Element of the General Plan*, which clearly indicates that West Adams Boulevard is a city-designated Scenic Highway, was adopted by City Council on September 16, 2016, and is the governing document. It would require that the project not only primarily face Adams Boulevard, and have entrances and windows facing Adams Boulevard, it would also need to respect the prevailing setbacks. (SB330 does not apply; this project was submitted long before that). This is relevant to today’s matter because in order for the Commission to approve a categorical exemption the project must be in compliance with the City’s General Plan.

I thank the Honorable Commissioners for taking the time to read through all of the attached material in the file for this case. 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

3).

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NORTH UNIVERSITY PARK COMMUNITY ASSOCIATION

April 1, 2021

TO: South Area Planning Commission

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

Honorable Commissioners;

NUPCA, the North University Park Community Association, would like to support the appeal before you by WAHA and make a few comments regarding this project and its proposed second CE.

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 29th 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 102-unit project.

The Project Is Inconsistent with the Redevelopment Plan

First and foremost, we are concerned the project was approved prior to review of its conformance to the Hoover-Exposition-University CRA Redevelopment Plan which was subsequently undertaken and reviewed in a January 28, 2021 Letter of Determination. As a land use overlay, it is very much still in place and it governs development within the adopted boundaries of the Project Area and was ignored until **after** project approval and with no public hearing.

This is important for multiple reasons, not least because the Redevelopment Plan specifically indicates that the Agency approve density bonuses. 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).¹

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*”). 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.”

¹ 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.

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 for this Project to include a proposed additional number of parking spaces as a part of the Conditional Use Permit.

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.

RDP Review Process

Staff and applicant spent several years totally ignoring the redevelopment plan requirements and refusing to go through the redevelopment process requesting a variance to the Plan during the project approval process. At the very last minute, at City Council on the morning of the hearing an "emergency" added note was placed on the agenda requiring the CRA/redevelopment plan review as a condition of the approval. Obviously, a major part of that problem is that a CEQA review was done but not including this portion. There should only be one environmental for one project yet there are two CEs. Given the facts of this case, and all of the record, the City should begin environmental review and public hearings for a variance to the Redevelopment Plan.

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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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 jurisdiction al 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*

5).

LAURA MEYERS

1818 South Gramercy Place • Los Angeles, CA 90019
Tel: 323-737-6146 • Fax: 323-730-0432 • E-mail: lauramink@aol.com

July 28, 2019
South Los Angeles Area Planning Commission
200 N. Spring Street, Room 272
Los Angeles, CA 90012

RE: ZA-2018-2453-CU-DB-SPR-1A, 806 West Adams Blvd., Los Angeles CA 90007

The project would demolish the existing on-site building and parking lot and construct 99 five-bedroom apartment units within six, three-story buildings over a single-level podium parking structure, totaling four stories. Five of the apartment units would be restricted affordable units for Very Low Income households. An additional four-story building would provide a clubhouse that would include a variety of resident-serving amenities. In total, the project would construct 183,150 square feet of new floor area. The seven buildings would sit on a fully enclosed and screened single-level, ground-floor parking structure providing a total of 259 vehicle parking spaces for off-street parking and 109 bicycle parking spaces. A total of 19 on-site, non-protected trees will be removed as a result of the project.

Dear Commissioners:

I am writing today **IN SUPPORT** of the Appellant Jim Childs and **NOT** in support of the Owner/Applicant/Appellant.

It is my understanding (not from receiving the Determination itself, because it was not sent to me despite my having submitted written materials for the case) that the Zoning Administrator somehow does not believe Adams Boulevard between Figueroa and Crenshaw is a Designated Scenic Highway.

I have attached the City of Los Angeles's own materials showing that Adams Boulevard has indeed been so designated locally – which is the only thing that matters in this case. Designation is designation, be it local or state.

This proposed Project as presented previously (I have not seen updated plans, if any) turns its face to Severance and its side to Adams Boulevard, with minimal setback and does not respect the Scenic Highway requirements.

I also have issues with Planning staff seemingly relying on the former Community Redevelopment Agency (CRA) minimal staff to somehow subsequently apply the Redevelopment Plan requirements and standards to this project, rather than requiring them NOW – especially in light of the fact that the City Planning Department is poised to take over the functions shortly (the MND is circulating now with an August 7 deadline for response).

Thank you for your consideration.

Laura Meyers
Cell 323-868-0854

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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 29th 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).²

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"). 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.

² 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.

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
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** Please send any notices to both addresses*