

COMMENTS (verbal) by Appellant (Jean Frost for WAHA)

Honorable Commissioners

I ask you to sustain the appeal before you. What happens on this unique 2.8-acre site will affect how University Park is developed for years to come and whether the housing created now and, in the future, will meet the stated objectives of the Redevelopment Plan:

“To make provisions for housing as is required to satisfy the needs and desires of the various age, income, and ethnic groups of the community, maximizing the opportunity for individual choice. 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.

To promote compatible development, with consideration to scale, height, material, architectural quality, and site orientation”

This project fails on every point. As a result, it has environmental impacts and is not CEQA exempt. The City in error states that the Redevelopment Plan procedures did not become effective until November 11, 2019 which is simply wrong.

There is every reason in the world to sustain our appeal based on the facts. There **is** substantial evidence in the record which the City ignores. (which includes CF 1603, the ZA 2018-2453-CU-DB-SPR-1A and Superior Court Case #20STCP00916.)

1. The record shows that substantive arguments have been made by WAHA, the Adams Severance Coalition and numerous other commenters: NANDC (neighborhood council), USC, WARD Economic Development, ACCE, NUPCA, City Living Realty, MSMU, UPAC, SEIU Local 721, the University Park HPOZ, and scores of individual experts and stakeholders that have given factual, eyewitness testimony. And yet the City continues to bury its head in the sand in a post hoc rationalization effort to approve what flies in the face of the facts.

2. From the beginning of the approval process, we and others have argued that the Redevelopment Plan is an overlay that takes precedence over other City rules (as the Redevelopment Plan clearly states.) Overlays are powerful tools adopted because there are special circumstances that warrant them. (The Hoover - Exposition/University Redevelopment Plan was adopted in 1966 and expires in 2029).
3. This project does not meet the requirements of the Redevelopment Plan and therefore does not qualify for a class 32 exemption.
4. Staff and applicant spent several years totally ignoring the redevelopment plan requirements. They refused to go through the redevelopment process requesting conformance and a variance to the Plan during the project approval process.¹ They cannot meet its requirements for density bonuses and housing objectives.
5. They applied for CRA approval **after** project approval and the City held no public hearings. Rather, it issued a Letter Determination on 1/28/2021 which includes the CE that we are appealing. The requirements of the Redevelopment Plan are greater than and exceed the city's requirements and very importantly take precedence.

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.

¹ 1. . At the very last minute, at City Planning Commission on the morning of the City's project hearing, an "emergency" added note was placed on the agenda requiring the CRA/redevelopment plan review as a condition of the approval.

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.²

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.

These findings cannot be made if the decision is based on facts.

We ask that you find that this project IS an **exception** to the exemptions. There **is** significant effect due to unusual circumstances. Adams Boulevard is a City scenic highway and yet the Adams Boulevard frontage is being treated as a side yard. There are impacts to the surrounding properties and streetscapes and elevations clearly show this. The applicants own data states there will be 1518 additional trips per day on Severance Street if this project is done. And 880 (possibly 1000) students will be added to this site. Their own Concord study based the monetizing of this development on student beds and compared the proposed project to other student bed-oriented rentals.

² DENSITY

The densest community in Los Angeles, per the Los Angeles Times, is Koreatown. Koreatown per this source has a density of 43,560 people per square mile. That translates to about 68 people per gross acre (43,560/640). On a net acre basis, after subtracting for roads and parks, this figure might be 25% greater or about 85 people per acre.

The development on Adams Boulevard has 506 bedrooms. Many of them will rent to students. Assuming about half of the bedrooms are occupied by two individuals, the population will be around 750 people on 2.85 acres or about 263 people per net acre or approximately three times the density of the densest neighborhood in Los Angeles. Of course, this is a focused analysis, but it does suggest that the project challenges its surroundings.

Los Angeles must get denser, and each neighborhood in Los Angeles needs to consider how to contribute to this, but at the same time, a project that is three times the density of the densest neighborhood in Los Angeles is not compatible in this circumstance. Given the density proposed, this project does little to alleviate existing housing inequities in the University Park/Hoover area. Rather, it does the opposite and adds luxury units for a transient population. This will likely exacerbate rents in the area and further drive rents and displacement upwards. The project's 5% of set aside affordable and workforce units in no way addresses the great needs or desires of working people in this community. Perhaps if the affordability quotient was more proportionate to the needs of the existing population, some degree of additional density, might be acceptable.

This is not the housing needed in our community and required by the Redevelopment Plan objectives.

The City staff response to the appeal is weak and misleading. "The challenger must show "that the project has some feature that distinguishes it from others in the exempt class, such as size or location"

WAHA has done so.

And show "that there is a reasonable possibility of a significant effect due to unusual circumstance"

We have done so.

There **ARE** cumulative impacts and the record so shows.

The City argues that aesthetics do not apply but 21099(d)(2)(B) explicitly states impacts on historic resources should be considered.

The applicant has engaged in a fatal self-imposed flaw: "that this is a by right project" (which he so stated at a public meeting.) Further, his representative claims that the Development requirements were imposed after project approval: again, not according to the facts.

You are being asked to concur that the findings for the density bonus under the redevelopment plan were made, determine that this project complies with the redevelopment plan objectives, which it clearly does not, and agree that this project qualifies for a categorical exemption which it clearly does not. The evidence IS there, and the record so shows. Please sustain the appeal. I am available for questions and our attorney Amy Minter is also available by phone for questions.

Jean Frost, appellant

For WAHA 213 840-5998