

Communication from Public

Name: Adams Severance Coalition

Date Submitted: 08/06/2021 12:05 PM

Council File No: 19-1603-S1

Comments for Public Posting: The Adams Severance Coalition joins with many area stakeholders in asking for environmental review. It is unfortunate that the substantial evidence in the record has been largely ignored in spite of the expert opinion, fact based observation and supplied factual data. Redevelopment requirements are greater than and exceed the city's and take precedence. There are obvious unique circumstances here and the record clearly demonstrates that fact. We ask that you find that this project IS an exception to the exemptions. There is significant effect due to unusual circumstances. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances. There ARE unusual circumstances. Further this does not comply with the goals 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 does not provide for housing to "satisfy the needs and desires of the various age, income, and ethnic groups of the community." For the record I am providing a comment letter from Brian League on behalf of USC.



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

Via Email

RE: 806 W Adams Boulevard / DIR-2020-43388-RDP-1A, ENV-2018-24554-CE

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

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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,

A handwritten signature in blue ink, appearing to read "B. C. League", with a long horizontal flourish extending to the right.

Brian C. League
Executive Director, Land Use and Planning

cc: Henry Chu, Zoning Administration
Council District 9