

## Communication from Public

**Name:** Andrew Brady  
**Date Submitted:** 03/30/2022 01:59 PM  
**Council File No:** 19-1603-S1  
**Comments for Public Posting:** Please see the attached letter from the Applicant's representative, Andrew Brady of DLA Piper. Part 4 of 17 documents attached.

- (b) **The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.**

The approximately 2.8-acre Project Site is located in the South Los Angeles Community Plan area within the city limits of Los Angeles. The Project Site is located within a previously developed portion of the University Park neighborhood, situated between a four-story residential building to the west across Severance Street, a three-story residential building to the north across Adams Boulevard, and a two-story commercial building to the south owned by the University of Southern California. The location is close to transit, as well as cultural, commercial/retail, and entertainment amenities. Therefore, the Project would occur within city limits on a site of no more than five acres substantially surrounded by urban uses.

- (c) **The project site has no value as habitat for endangered, rare or threatened species.**

The Project Site is located in an urbanized area within the South Los Angeles Community Plan area. This site is currently developed and occupied by a two-story plaster building and accompanying surface parking lot with ornamental trees and landscaping. Existing development covers the majority of the Project Site. There are no special-status plant species observed within a 2-mile radius of the Project Site (California Natural Diversity Database, 2018). While occurrences of American Badger, Burrowing owl, and Southwestern willow flycatcher have been observed within a 2-mile radius of the Project Site (California Natural Diversity Database, 2018), the existing landscaping at the Project Site is ornamental and not expected to provide habitat for any special-status species. Further, the Project Site is in an urban area and heavily disturbed. Therefore, the Project Site has no value as habitat for endangered, rare, or threatened species. While ornamental landscaping may provide nesting habitat for native birds and temporary roosting habitat for tree-nesting bats, the applicant will be required to comply with existing laws and regulations that protect raptors and migrating birds. In accordance with standard City conditions of approval and in compliance with applicable regulatory standards, pre-construction surveys of all potential special-status bird nesting habitat in the area of construction disturbance would be required as a condition of approval if Project construction occurs during nesting season. Therefore, the Project would not result in any impacts to listed species or the degradation of habitat for endangered, rare, or threatened species.

- (d) **Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.**

The Project Site is currently developed and occupied by a two-story plaster building and associated surface parking lot and landscaping. The Project involves the demolition of the existing two-story plaster building and the construction of a multi-family residential development which would include 100 five-bedroom and two three-bedroom apartment units (up to 506 bedrooms) within six, four-story buildings and a four-story clubhouse building totaling 185,985 square feet. All construction-related impacts would be less than significant and temporary in nature. No permanent significant impacts are anticipated to occur.

### Traffic

The Project Site occupies approximately 2.8 acres, or 124,257 square feet, and is developed with a two-story building, surface parking lot, and associated landscaping. The Project would demolish the existing building and replace it with a multi-family residential development which would provide off-campus student housing. The Los Angeles Department of Transportation (LADOT) analyzes potential project-generated traffic impacts by measuring traffic at selected intersections during typical weekday morning (7:00 AM to 10:00 AM) and afternoon (3:00 PM to 6:00 PM) peak hours, and then comparing these existing conditions with projections of present and future conditions, with and without the Project. The August 2018 *Transportation Impact Study for the 806 W. Adams Boulevard Residential Project* (Gibson, 2018) and the July 2018 July 2019 *Supplemental Analysis for 806 West Adams Boulevard* (Gibson 2019) determined that, after accounting for trip reduction credits, the Project would generate 1,158 net new trips to and from the Project Site on a typical weekday (see Attachment A). This would include 14 morning peak hour trips and 77 afternoon peak hour trips. The study conducted detailed analyses of the effect of these trips within study area that includes six intersections under Existing with Project Conditions and Future with Project Conditions. Under Existing with Project Conditions, the study determined that all intersections would continue to operate at a Level of Service (LOS D) or better during the analyzed peak hours (consistent with existing conditions). Under Future with Project Conditions, the study determined that incremental traffic increases resulting from the Project would not exceed the applicable thresholds of significance created by LADOT that are utilized by the City for CEQA traffic analyses, and thus would not result in a significant impact at any of the six intersections within the study area. Thus, the Project would not result in significant traffic and transportation impacts and no mitigation measures are required. The study also concluded, in accordance with the 2010 Los Angeles County Congestion Management Program (Metro, 2010) (CMP) guidelines, that the Project would not have a significant impact on the regional freeway, arterial, or regional transit system.

### Noise

A significant impact would occur if the Project would result in exposure of persons to or generation of noise levels in excess of standards established in the General Plan or applicable provisions the City's noise ordinance. The City of Los Angeles has established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise-sensitive land uses. These regulations pertain to construction hours (LAMC Section 41.40). LAMC Section 41.40 specifies that no person shall, between the hours of 9:00 p.m. and 7:00 a.m. of the following day, perform any construction or repair work of any kind upon, or any excavating for, any building or structure. In addition, the operation, repair or servicing of construction equipment and the delivery of construction materials to the Project Site shall be prohibited during the hours specified. Of particular relevance to the Project, LAMC Section 112.05 also specifies the maximum noise level of powered equipment or powered hand tools in residential land use zones. It states that between the hours of 7:00 a.m. and 10:00 p.m., in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level

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September 12, 2019

Applicant/Owner:  
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Suite 1150  
Los Angeles, CA 90025

Representative:  
Kyndra Casper  
DLA Piper LLP (US)  
550 South Hope Street  
Suite 2400  
Los Angeles, CA 90071-2678

RE: Case No. ZA-2018-2453-DB-CU-SPR  
Address: 806 West Adams Boulevard (758 –  
832 West Adams Boulevard)  
Planning Area: South Los Angeles  
Zone : RD1.5-1-O  
D. M. : 121-5A201, 123A201, 123A203  
C. D. : 9  
CEQA : ENV-2018-2454-CE

**RE: ENV-2018-2454-CE (Categorical Exemption - Class 32)**

**Project Description:**

The proposed project is located at 758 – 832 West Adams Boulevard & 2610 South Severance Street and involves the construction and operation of an urban infill residential development on an approximately 2.8-acre site in the University Park neighborhood of the South Los Angeles Community Plan Area, less than one mile from the University of Southern California (USC) campus. The irregularly-shaped project site is located at the southeast corner of West Adams Boulevard and Severance Street on a block that is also bordered by Figueroa Street to the east, 28th Street to the south, and University Avenue to the southeast. The Project Site is zoned RD1.5-1-O (Restricted Density Multiple Dwelling, Height District 1, Oil Drilling Supplemental Use District) in the Los Angeles Municipal Code (LAMC) and designated as Low Medium II Residential in the South Los Angeles Community Plan. The project site is currently occupied by a two-story plaster building used by the University of Southern California as an office, childcare, and classroom facility, as well as a surface parking lot and ornamental trees and landscaping. The project site previously contained a separate two-story office, childcare, and classroom facility that was demolished in 2017 as a separate action that is not part of the currently proposed project. The existing building was constructed in 1971. Adjacent land uses include a four-story residential building to the west across Severance Street, a three-story residential building to the north across Adams Boulevard, a two-story commercial building on the adjacent property to the east, and two

and one-story residential and educational buildings to the south owned by the University of Southern California. Transit bus service is provided along Washington Boulevard, 23rd Street, Adams Boulevard, Jefferson Boulevard, Figueroa Street, Flower Street, Vermont Avenue, and Hoover Street within the project site vicinity. Additionally, the Project Site is located less than 0.5 miles southwest of the Los Angeles County Metropolitan Transportation Authority's (Metro) Expo Line LATT/Ortho Institute light rail station, which provides service between downtown Los Angeles and downtown Santa Monica.

The project will demolish the existing on-site building and parking lot and construct 100 five-bedroom apartment units and two three-bedroom apartment within six, three-story buildings over a single-level podium parking structure, totaling four stories. Five of the units will be restricted affordable units for Very Low Income households. An additional four-story building provides a clubhouse that would include a variety of resident-serving amenities. In total, the project will construct 185,895 square feet of new floor area. The seven proposed buildings sit on a fully enclosed and screened single-level, ground-floor parking structure providing a total of 255 vehicle parking spaces for off-street parking. Vehicular access to the project site will be provided via a full access driveway (accommodating both right-turn and left-turn ingress/egress movements) located on Severance Street and a restricted access driveway (accommodating only right-turn ingress/egress movements) located on Adams Boulevard. The driveways will be designed to LADOT standards under the review of City staff.

The project includes outdoor residential amenity spaces at the podium and building roof levels. The podium-level amenity space would include landscaping, gathering areas, paseos, outdoor cooking areas, and an outdoor swimming pool. Building roofs contain additional private amenity spaces that would include landscaping and outdoor lounge and cooking areas.

Construction of the project is scheduled to begin in 2019 and would occur over a 22-month period, with anticipated completion in 2021. Although the project is anticipated to be constructed in a single phase, construction could occur in multiple phases.

During the construction period, approximately 16,120 cubic yards of building demolition material, asphalt/pavement, and soil would be exported from the project site. The proposed haul route from the project site would involve trucks traveling east on Adams Boulevard, north on Figueroa Street, west on 18<sup>th</sup> Street, and north on I-110 to a proposed export site in Santa Clarita. The final haul route is subject to review and approval by the Los Angeles Department of Building and Safety.

Because the project applicant is seeking discretionary City approvals, the Project meets the definition of a "project" under the California Environmental Quality Act (CEQA). (See CEQA Guidelines § 15378.) However, technical analyses of the Project determined that it is eligible for the Categorical Exemption from CEQA environmental review pursuant to Article III, Section I, Class 32 of the CEQA Guidelines. The Class 32 Exemption is intended to promote infill development within urbanized areas. It applies to urban infill projects that meet the following criteria:

- a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.
- b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.
- c) The project site has no value as habitat for endangered, rare or threatened species.

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September 12, 2019

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Los Angeles, CA 90025

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DLA Piper LLP (US)  
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