

Communication from Public

Name: Jean Frost West Adas Heritage Association

Date Submitted: 04/04/2022 10:46 AM

Council File No: 19-1603-S1

Comments for Public Posting: We offer these supplemental comments as the appellant in this matter. Under separate submission, we will submit a cover letter from Catten Brown Carstens and Minter. WAHA and the Adams Severance coalition files this appeal not to prevent development but to seek a higher level of compliance with the Redevelopment Plan and environmental and societal health; WAHA has offered solutions to mitigate the impacts but were rejected. We would like to see housing that meets the needs of all sections of the community, that does not create a podium based, barracks-like seven buildings in the heart of a historic and diverse community. Ideally, we would like to see a 1/3 affordable housing, 1/3 family housing and 1/3 student housing; a pedestrian friendly design that does not wall itself off from what is a vibrant and diverse community; undergrounding of parking to reduce the mass of the buildings. This is a brief wish list of what might serve as mitigations which a process of environmental review might consider. We do not understand how the applicant is unwilling to commence environmental review and yet underwrites legal and consultant costs that exceed what an MND would have cost. We ask PLUM to sustain its earlier 4-1 decision. The record shows that this is an exception to an exemption under CEQA. The Project's potential impacts to historic resources, the cumulative impacts of this type of student housing development in the University Park neighborhood and the unusual circumstances of this Project's failure to comply with the Redevelopment Plan, Community Plan and Municipal Code requirements need to be evaluated in the context of the Redevelopment Plan which sets specific standards for development and density bonuses, over and above what is required by the LAMC.



Supplemental Submittal By Appellant: ENV-2018-2454-CE-1A; CF 19-1603-SI (Case no. DIR-2020-4338-RDP-1A) April 4, 2022

Honorable Members of the Planning and Land Use Committee of Council:

Facts do matter. It is at the heart of CEQA that facts guide decision making. The PLUM action taken on August 17, 2021, was fact based, as was the August 12 Planning Department Memorandum making specific findings in support of the appeal. There is no reason to change the PLUM position and no reason to reconsider this valid, transparent and community affirming decision.

The reconsideration is not an appropriate action.

“At a regular meeting held on August 17, 2021, the PLUM Committee considered a report from the SLAAPC and a CEQA appeal filed for the property located at 806 West Adams Boulevard. DCP staff provided an overview of the matter. After an opportunity for public comment, and presentations from the Applicant’s Representative and Appellant, the Committee recommended to grant the appeal and thereby overturn the determination of the SLAAPC in approving a Categorical Exemption as the environmental clearance for the Redevelopment Plan Project Compliance for the project. **This matter is now submitted to the Council for consideration.** This matter is now submitted to the Council for consideration.”

We see no basis for reconsideration by PLUM. There is no new information to alter what was a carefully considered decision to support the appeal by the West Adams Heritage Association and the Adams Severance Coalition. Instead, what has been offered by the applicant and his representatives continues the succession of half-truths that confuse and alter the facts. When confronted with a decision that the developer finds unacceptable, his representatives consistently alter reality.

In a March 31, 2022, a recent submittal by the developer representative, he applies law **that does not apply to this development.** The applicant once again inaccurately claims that Redevelopment Plan Project Compliance is a ministerial approval. This is clearly incorrect, as the City has already determined. A determination of consistency with the Redevelopment Plan requires some subjective determinations by the City, as well as some objective determinations such as the Redevelopment Plan’s base density, thus it is a discretionary approval. (CEQA Guidelines, § 15268, subd. (d) [“Where a project involves an approval that contains elements of both a ministerial action and a discretionary action, the project will be deemed to be discretionary and will be subject to the requirements of CEQA.”].)

The applicant attempts to mislead the City by relying on an inapplicable section of the Housing Accountability Act in support of this claim. The applicant cites to the version of Government

Code section 65589.5(j)(2)(B) that is currently in effect, when the applicable statutory provision is the version that was in effect in 2018 when the applicant's application was deemed complete. That version, (see WAHA's submittal of the applicable statutory provisions submitted on April 3) states:

“(j) When a proposed housing development project complies with applicable, objective general plan and zoning standards and criteria, including design review standards, in effect at the time that the housing development project's application is determined to be complete, but the local agency proposes to disapprove the project or to approve it upon the condition that the project be developed at a lower density, the local agency shall base its decision regarding the proposed housing development project upon written findings supported by substantial evidence on the record that both of the following conditions exist:

(1) The housing development project would have a specific, adverse impact upon the public health or safety unless the project is disapproved or approved upon the condition that the project be developed at a lower density. As used in this paragraph, a “specific, adverse impact” means a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete.

(2) There is no feasible method to satisfactorily mitigate or avoid the adverse impact identified pursuant to paragraph (1), other than the disapproval of the housing development project or the approval of the project upon the condition that it be developed at a lower density.”

The applicant representative misleads the City by relying on an inapplicable version of the Housing Accountability Act that did not go into effect until January 2020, nearly two years after their application was deemed complete. The version in effect when this project's application was deemed complete does not set a time limit for the City's determination of compliance.

Further Planning in its August 12, 2021 letter was very specific as to not rely on any earlier planning department analysis:

*“As discussed below, upon careful consideration of the appellants' points and in review of the entire record, Planning staff has determined that the Project does not qualify for use of the Class 32 Categorical Exemption for the Redevelopment Plan Project Compliance Review. The appeal in its entirety is located within Council File No.19-1603-S1. Below is a summary of the findings demonstrating that the project is not categorically exempt from the California Environmental Quality Act pursuant to CEQA Guidelines, section 15332 (Class 32). To the extent any of the analysis in this report appears to conflict with the analysis contained in the Staff Appeal Report dated July 28, 2021, or any other appeal reports contained in the Council File, the analysis in **this report shall supersede any conflicting analysis in the previous appeal reports.**”*

The misrepresentations of the developer and his representatives have been systemic and enduring. In the presentation the developer made to the Neighborhood Council on January 3,

2019, he asserted that it was a By-Right project and informed those in attendance that categorical exemptions were difficult to overturn.

The applicant also misrepresented or misunderstood the significance of both the Redevelopment Plan and the South Community Plan:

*Following its final approval, the Planning Department determined the Project was required to apply for one additional entitlement, a Redevelopment Plan Project Compliance approval, which was required by an ordinance adopted by the City in November 2019 – after the final CPC hearing on the Project’s entitlements.*¹ Not true. The applicant has been advised of this clearance on numerous occasions. And that there are stated conditions: Redevelopment Plan compliance.

In fact, the requirement for Redevelopment Compliance was noted at the City Planning Commission hearing and was also noted numerous times in public testimony. The Redevelopment Plan compliance had been ignored by the applicant until he belatedly filed for Redevelopment Plan compliance approval in 2021. The required compliance process had no public hearings, a fact which was strongly objected to by stakeholders when the City issued its RDP compliance letter and CE on January 28, 2021. The developers’ representation that all of a sudden the City imposed a new entitlement requirement is simply misleading and contrary to the facts.

The developer stated that “the CEQA analysis for our project was previously upheld by the PLUM committee and full City Council in January 2020 on an appeal raising the same arguments as the current appeal. The City is also currently defending this same CEQA analysis in litigation that followed from that prior approval, and nothing about the project has changed since that time.”²

Again, an inaccurate and misleading reference ignoring that the fact that current case before you considers the Redevelopment Plan compliance which the “project” case did not. The developer ignores that the Redevelopment Plan compliance had been delayed by his own actions when as the applicant he filed for Redevelopment Plan compliance approval in 2021.

The earlier case – the “project case”- which the developer wishes to bring you back to as “final” did not consider conformance to the Redevelopment Plan which triggers as an overlay that supersedes the LAMC, new requirements not considered in the earlier “project case” and CEQA review.

And the earlier case continues to be on appeal in the courts. The trial court decision which the applicant’s representative has submitted to you is **not final but on appeal**. But the trial judge nevertheless understood that while:

¹ DLA Piper Andrew Brady letter of June 11, 2021, to SAPC

² August 17, 2021 Letter to PLUM, from applicant Robert Champion, CEO Champion Real Estate

The City persuasively argues that conditioning its approval on the CRA/LA approval assures consistency with the Redevelopment Plan because if Real Parties were somehow unable to obtain the CRA/LA approval, the City would not issue a building permit to Real Parties.

The trial court recognized that conditioned approval is not final approval.

Which brings us to the appeal by the West Adams Heritage Association and the Adams Severance Coalition. The appeal is supported by substantial evidence in the record.

We ask you to sustain the appeal before you as PLUM did on August 17, 2021. 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 purpose of this appeal is to obtain environmental review of a project that can and ought to be mitigated through the environmental process.

There is every reason in the world to sustain our appeal based on the facts. There **is** substantial evidence in the record. How this 2.8 acres site should meet Redevelopment Plan goals that bring social justice to this deemed “blighted” Plan area.

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, UNIDAD and scores of individual experts and stakeholders that have given factual, eyewitness testimony.

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).

This project does not meet the requirements of the Redevelopment Plan and therefore is not CEQA exempt. The suggestion made on March 31 by the developers representative that Charter provision 245 should have been applied is yet another misleading attempt by the applicant create false procedural barriers to avoid the evaluation under CEQA. This appeal is a CEQA appeal, completely appropriate and justified; absent CEQA approval no RDP project approval is sustained, as the applicant ought to realize.

WAHA and the Adams Severance coalition files this appeal not to prevent development but to seek a higher level of compliance with the Redevelopment Plan and environmental and societal health; WAHA has offered solutions to mitigate the impacts but were rejected. We would like to see housing that meets the needs of all sections of the community, that does not create a podium based, barracks-like seven buildings zin the heart of a historic and diverse community. Ideally, we would like to see a 1/3 affordable housing, 1/3 family housing and 1/3 student housing; a pedestrian friendly design that does not wall itself off from what is a vibrant and diverse community; undergrounding of parking to reduce the mass of the buildings. This is a brief wish list of what might serve as mitigations which a process of environmental review might consider.

We do not understand how the applicant is unwilling to commence environmental review and yet underwrites legal and consultant costs that exceed what an MND would have cost. We ask PLUM to sustain its earlier 4-1 decision. The record shows that this is an exception to an exemption under CEQA. The Project's potential impacts to historic resources, the cumulative impacts of this type of student housing development in the University Park neighborhood and the unusual circumstances of this Project's failure to comply with the Redevelopment Plan, Community Plan and Municipal Code requirements need to be evaluated in the context of the Redevelopment Plan which sets specific standards for development and density bonuses, over and above what is required by the LAMC.

Sincerely,

Jean Frost
For the West Adams Heritage Association and
The Adams Severance Coalition
c/o 2341 Scarff Street, LA, CA 90007
213 747 2526
indiejean@att.net

Communication from Public

Name: Jean Frost West Adams Heritage Association

Date Submitted: 04/04/2022 10:56 AM

Council File No: 19-1603-S1

Comments for Public Posting: Cover letter to appellant 4.4.2022 submittal. WAHA submits the following cover enclosure from Chatten Brown Carstens & Minter, on behalf of the West Adams Heritage Association (“WAHA”) and the Adams Severance Coalition (“ASC”), objecting to the proposed reconsideration of a determination made by this Committee nearly eight months ago and in support of the PLUM Committee’s recommendation to grant WAHA’s and ASC’s appeal regarding the above referenced Project. This completes supplemental comments submitted by WAHA that was prepared in consultation with our firm.



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April 4, 2022

Via Email

Hon. Chair Marqueece Harris-Dawson
Members of the Planning and Land Use Management (PLUM) Committee
200 N. Spring Street, Rm. 272
Los Angeles, CA 90012
Attn: Leyla Campos, Legis. Asst. (clerk.plumcommittee@lacity.org)

Re: Proposed "Reconsideration" of August 17, 2021 Granting of Appeal of
Redevelopment Plan Consistency Determination; **CF 19-1603-S1**;
APPEAL ENV-2018-2454-CE-1A; Related Case DIR-2020-4338-RDP, ZA-2018-2453-
CU-DB-SPR 806 W. Adams Boulevard and 2810 S. Severance; CEQA Appeal under
LAMC Section 197.01

Dear Committee Members:

We write on behalf of the West Adams Heritage Association ("WAHA") and the Adams Severance Coalition ("ASC") ***objecting to the proposed reconsideration of a determination made by this Committee nearly eight months ago*** and in support of the PLUM Committee's recommendation to grant WAHA's and ASC's appeal regarding the above referenced Project. Enclosed please find supplemental comments submitted by WAHA that was prepared in consultation with our firm. In summary, issues for raised by the proposed reconsideration and appeal include:

- The Rules for Conduct of the City Council do not provide any allowance for reconsideration of a determination made by the PLUM Committee. (See Rules 58-74.) Moreover, while Rule 51 does allow for the City Council to reconsider a matter, it may only do so at the next regular hearing. The PLUM Committee made its determination to recommend granting the appeal on August 17, 2021. There has been numerous PLUM Committee meeting since that time. Thus, reconsideration is not allowed and even if it were, it is far too late to do so.
- In a March 31, 2022 submission, the Project applicant attempts to mislead the PLUM Committee by relying on a version of the Housing Accountability Act that did not go into effect until nearly two years after their application was deemed

complete. The deadlines included in the updated statute did not go into effect until January 1, 2020 and do not apply to an application deemed complete in April 2018.

- A final determination in the *WAHA v. City of Los Angeles* litigation has not yet been reached because this matter is on appeal. Moreover, in the trial court litigation, the City relied on the post-approval Redevelopment Plan Consistency determination to ensure that the Project is consistent with the Hoover/Exposition/University Park Redevelopment Plan.
- As the PLUM Committee determined on August 17, 2021, the approval of Redevelopment Plan Consistency cannot rely on a Class 32 categorical exemption, which requires consistency with applicable land use plans, because the Project is inconsistent with the Hoover/Exposition/University Park Redevelopment Plan.

I will be available to address questions you may have at the April 5, 2022 PLUM Committee meeting. Thank you for your time and consideration in this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Amy Minter", is written over the printed name.

Amy Minter

Enclosures

Communication from Public

Name: Laura Meyers

Date Submitted: 04/04/2022 08:52 PM

Council File No: 19-1603-S1

Comments for Public Posting: My name is Laura Meyers, and I have lived in the Historic West Adams District for four decades. Among my community activities over these years, I served for 25 years as a member of the Community Redevelopment Agency's University /Expo Park Project Area (Advisory) Committee. This was initially an elected position, and later was converted to a City-appointed position (I was appointed by Council District 8). Much of our time was spent consulting with developers, and reviewing proposed projects, to make recommendations to the CRA Agency Board, which was responsible for approving all discretionary land use proposals. I am very familiar with the requirements of the Redevelopment Plan, which is still in effect. For clarity, any project that varies in any way from the Redevelopment Plan is considered to be a "variation" from the Plan. It is clear that the "Successor" to the Agency Board (the City of Los Angeles) is able to approve projects that vary in small or large ways from the Plan, but to do so is always a discretionary decision that requires Findings related to the Redevelopment Plan. Sadly, I find myself writing yet another comment letter on this very same matter – a project that has been before City decision-makers since 2018. Indeed, because this matter was previously considered by this Body, you will find in the Council File for this case my submission, dated August 2, 2021, which includes a collection of SIX prior letters going back to December, 2018. 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 about four (4) 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. The letters, and my public testimony, repeatedly note that the Applicant needed to adhere to the Redevelopment Plan process. And yet, still and once again, the Applicant is attempting to flout the Redevelopment Plan, not just failing to acknowledge its

importance but claiming that it is only a ministerial approval. This is SIMPLY NOT TRUE. The Redevelopment Plan under State law is an adopted Specific Plan. 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. Per above, I had written a first letter regarding the need for the Applicant to comply with the Redevelopment Plan in 2018. In my remarks on August 6, 2019 at the South Los Angeles Area Planning Commission I reiterated the importance of complying with the Redevelopment Plan. My perception – perhaps this is the general 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 did understand the Redevelopment Plan and recognized that this matter does NOT QUALIFY FOR A MINISTERIAL APPROVAL; and 2). Frankly, it appears that Applicant was attempting to avoid a public hearing. Bottom line: The Project at 806 West Adams Boulevard is INCONSISTENT with the Redevelopment Plan. Therefore, it cannot have a categorical exemption, nor a ministerial approval of the Project itself. Please do read my prior submission for a far more detailed analysis. I also don't understand how this matter can be reconsidered, since PLUM already acted, in August, and a Reconsideration matter is usually required to be done at the legislative body’s next meeting. Isn’t PLUM subject to the regular City Council Rules, which (like most legislative bodies in California) set forth the manner in which an item may be reconsidered? Specifically, Item 51, in Chapter IX, “Disposition of Items,” states that a motion to reconsider is to be made by a member who voted on “the prevailing side,” and “The motion shall only be in order once during the legislative day in which the given question was voted upon, and once during the next regular meeting.” The agenda does not make clear if there was a motion to reconsider, nor who made it; and certainly PLUM has met numerous times between August and now. The agenda also does not indicate that this item is a “Reconsideration” at all. Thank you very much.

Communication from Public

Name: Mitzi March Mogul

Date Submitted: 04/05/2022 02:35 AM

Council File No: 19-1603-S1

Comments for Public Posting: The project has apparently been erroneously approved without understanding the impacts the project will have on the many historic resources surrounding the project location. And with no environmental review in spite of its lack of compliance to the Redevelopment Plan. There are many types of impacts, none of which have been evaluated with regard to this project. It is imperative that a full CEQA review be done to address the impacts on the surrounding historic resources and make the necessary changes to the proposed project so that it is compatible with its neighbors. It is my hope that a proper CEQA evaluation be done. Only then can the project proceed in a manner appropriate to its location and compliant to the Redevelopment Plan.

MITZI MARCH MOGUL
HISTORIC PRESERVATION CONSULTANT
1725 Wellington Road Los Angeles, CA 90019 323/734-9980 Mogulink@gmail.com

April 5, 2022

Re: 806 West Adams, DIR-2020-4338-RDP, ENV-2018-2454-CE1A
Environmental No. ENV-2018-2454-CE, CD9

Honorable Members of the Planning and Land Use Committee:

I have been asked by the West Adams Heritage Association (WAHA), the North University Park Community Association (NUPCA) and the Adams Severance Coalition (ASC) to address the issues regarding the project located at 806 W. Adams Boulevard and 2610 Severance Street. I am a Historic Preservation Consultant with more than 30 years in practice in Los Angeles.

The project has apparently been erroneously approved without understanding the impacts the project will have on the many historic resources surrounding the project location. And with no environmental review in spite of its lack of compliance to the Redevelopment Plan.

Two buildings have already been demolished in anticipation of approval of the project; one building remains, as well as a parking lot, both of which are part of the project site. Although the property is not located within an HPOZ and neither the remaining building or the parking lot are designated historic in any way, does not minimize the impact of the project as currently proposed on adjacent historic properties.

In the CPC Decision Site Plan Review Findings, #7, Pages 5-6 it is stated:

The project is not within a Historic Preservation Overlay Zone. The subject property is comprised of four lots at 758 – 832 West Adams Boulevard and 2610 South Severance Street. 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. None of the existing structures on the project site are designated as historic cultural monuments and the project site is not located within a Historic Preservation Overlay Zone.

While the above description of the actual site is accurate, it fails to mention the proximity of a number of significant historic properties within close range and which would be substantially damaged in terms of their context, ambiance, environment (ie shade/shadow) and in some cases, quality of life.

When a project directly involves a listed historic property, certain regulations apply because of direct impact. In this case, even though the parcels for construction do not involve historic resources, those parcels are located in an area that is rich in historic resources. The secondary impacts to those resources have been completely ignored in examining the project. The City

documents as well as the Historic Resources Report do not even acknowledge that these other historic properties exist. The City only looked at the parcels intended for construction, however they do not exist in a vacuum. A 4-story contemporary building looming over a 2-story historic building is a major impact. Issues of traffic, noise, and other human-induced actions and effects will alter the quality of life for those occupying the historic structures as well as the way that others will experience the historic resources.

One of the reasons that we (Society) have developed mechanisms for preserving, restoring, and maintaining properties which have been determined to have historic value is that we recognize that these properties enhance our built environment and contribute to our understanding of history and our appreciation of outstanding design. Part of protecting them is controlling the nearby environment, be it natural or man-made. The point is not to prevent, only to control.

Ordinances and regulations have been instituted over the years without regard to whether or not they are in conflict with each other, producing only the “law of unintended consequences.” All indications are that both the City and the developer are taking advantage of this confusion in order to push the project through. For instance, stating that replacing a parking lot with a structure has no impact is wrong on its face: a parking lot is open space which affords views as well as minimizing encroachment. Clearly, there are impacts; whether they are significant cannot be determined without an acknowledgement and evaluation.

Page one of the Letter of Determination dated November 20, 2019 states:

...that based on the whole of the administrative record, the Project is exempt from CEQA pursuant to CEQA Guidelines, Section 15332, and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies;

As stated previously, there is significant and substantial evidence that the project as currently proposed would negatively affect historic resources. Just because those resources are not located on the project site does not mean that they are not impacted. The above statement has clearly been made by someone not versed in the guiding principles of historic preservation or the procedures and criteria for evaluation.

Under Site Plan Review Findings, the CPC Decision, #10, Page 10, states:

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. The revised project locates accessible rooftop amenities away from the perimeter of the building to minimize impacts on neighboring properties.

Far from minimizing impacts on the surrounding neighborhood, this project would dramatically increase negative impacts. The balconies, rooftop decks, outdoor lounge and cooking (barbeque) area, and outdoor swimming pool represent cumulative impacts of noise and unwanted odors. Locating these areas away from the perimeter of the building will not contain sound or odor; sound reverberates and carries, and odor rises and drifts through the air.

The same section further states:

The abundant landscaping will soften the appearance of the development, thus allowing the new design to blend in well with surrounding uses.

The comment about landscaping softening the building's appearance is a tacit admission that the building has a hard, unpleasant design and needs softening. Indeed, the design apparently does not blend in well with the surrounding area—it is attempting to use landscaping as a disguise.

The second driveway will be off of Severance Street where there will be one lane for vehicles to enter and another lane to exit.

Funneling all of that traffic on Severance Street would be disastrous for the residents of Severance Street, which is narrow and contains many historic structures. It is obvious that everyone has failed to observe current traffic patterns and anticipated traffic and brushed aside its cumulative impacts.

There is no question that there are secondary (also known as indirect) impacts of the project on adjacent and neighboring historic resources (which include the Kerkhoff Residence, Ezra Stimson House, Mount St. Mary's Doheny Campus/Chester Place Historic District, St. Vincent DePaul Church, Fraternity/Sorority Row, and many private residences on Severance and Scarff Streets).

It is not my intent to present arguments in order to prevent all development in that location, only to impress upon the City the need to fully assess the potential impacts on the community. As it stands, the decision seems to have been made without all the facts being examined and is therefore substandard. Regardless of whether or not it is the case, the appearance of the City favoring the developer is a slap in the face of the citizens.

There are many types of impacts, none of which have been evaluated with regard to this project. It is imperative that a full CEQA review be done to address the impacts on the surrounding historic resources and make the necessary changes to the proposed project so that it is compatible with its neighbors. It is my hope that a proper CEQA evaluation be done. Only then can the project proceed in a manner appropriate to its location and compliant to the Redevelopment Plan.

Sincerely,

Mitzi March Mogul

Mitzi March Mogul

ATT: Curriculum Vitae

CURRICULUM VITAE

Mitzi March Mogul
(323) 734-9980

1725 Wellington Road
Los Angeles, CA 90019
Email:

Mogulink@gmail.com

RELEVANT EXPERIENCE:

Continuing Historic Preservation Consultant
Advise on restoration, including paint, lighting, conservation techniques, CEQA regulations, tax credits, adaptive re-use, research, reports. Projects include Dominguez-Wilshire Building, Max Factor Building, Genesee Apartments, Mel's Drive-In, Hermosa Beach Community Center, Café Club Fais Do-Do, Desmond's Building, The Boat Recording Studio, Sonic Automotive,

Flower Drive Historic District, Versailles Apartments, Alvarado Terrace Park, Four Star Theater, Alexandria Hotel Addition; numerous private residences and Historic-Cultural Monument nominations and Mills Act submissions, including West Boulevard Bridge, Kite Coffee Shop, Heritage Square Museum, Alexandria Hotel Addition, Chateau Chaumont Apartments, numerous private residences, etc.

- 1997 Regional Arts Council Facilitator, Los Angeles Cultural Affairs Dept.
Responsible for promoting Councils, recruitment of Council members, reports on process, procedure, management, and recommendations, etc.
- 1991-1996 Writer, regular feature column, Collector Magazine
- 1991-1999 Preservation Editor, L.A. Architect
Monthly column and feature stories
- 1990-95 Regular contributor, Urban Explorer Magazine
- 1995-97 Historian, Tanzmann Associates
Project historian for the Community Redevelopment Agency Normandie 4321
Historic Preservation Education Program
- 1993 Prince of Wales' Foundation for Architecture
Organized the visit of Prince Charles on behalf of the Royal Household and represented the Prince of Wales' Institute and Foundation
- 1990-91 Consultant, Los Angeles Historic Theatre Foundation
Advise and coordinate membership campaign, fundraising and marketing
- 1991 Consultant, Maestro Foundation
Advised on development and membership
- 1989-90 Instructor, American College for Applied Arts
Historic Preservation: Designed curriculum and taught courses
- 1988--90 Director of Development, Heritage Square Museum
Responsible for pres/public relations; program development and implementation; fundraising and marketing; commercial use; staff management
- 1987-88 Administrator, West Adams Heritage Association
Handled all inquiries and correspondence; advised Board of Directors on Preservation Issues, assisted in coordinating activities of the organization; edited and produced monthly newsletter
- 1984-87 Administrative Assistant, Los Angeles Conservancy

Lectures and Tours

Wilshire Boulevard Centennial Walking Tour series
Northridge Arts Council (tour)
Friends of Hollyhock House (lecture)
Frank Lloyd Wright Home & Studio Foundation (lecture/tour)
Rudolph M. Schindler house tour

Berkeley School Alumni (lecture)
National Charity League (tour)
WPA Art & Architecture (tour/lecture) for Society of Architectural Historians
Workman Temple Homestead International Delegates to World Congress (tour)
International Interior Design Association (lecture)
Charles Rennie Mackintosh Society (lecture/tour)
American Institute of Architects (tour)
International Association of Assessing Officers, L.A. Chapter (lecture)
Istituto Italiano Di Cultura (panel discussion on Art Deco)
Windsor Square Hancock Park Historical Society ((lecture)
National Trust for Historic Preservation (tour, L.A. conference)
Los Angeles Pierce College (lecture)
Price Tower Museum (lecture)
Philbrook Museum, Tulsa OK (lecture)
AIA, Eastern Oklahoma chapter (lecture)
Cooper-Hewitt Museum (lecture)
Fresno Art Museum (lecture)
Palace of the Legion of Honor, San Francisco (lecture)
Museum of Latin American Art (lecture)
Antiquarian Society of California (lecture)
Curator, “Having a Wonderful Time: The History of Los Angeles Through Postcards”
Curator, “Well Done: The Story of Cookbooks and Commerce” exhibit at Heritage Square Museum
Curator, “Paving the Way” exhibit at Heritage Square Museum

Affiliations, Honors, Publications, Appearances:

Martin E. Weil Award for Historic Preservation
President, Los Angeles Historic Theatre Foundation
Vice-President, Board of Directors, Heritage Square Museum
President Emeritus, Art Deco Society of Los Angeles
Miracle Mile Design Guidelines Committee
Member, West Adams Heritage Association Preservation Committee
Chair, Lafayette Square Historic Preservation Overlay Zone Board
Co-chair, West Hollywood Centennial Celebration Committee, 1995
President, Board of Directors, Art Deco Society of Los Angeles, 1991-2006
Facilitator, International Coalition of Art Deco Societies, 1999-2001
Education Committee, Los Angeles Chamber Orchestra
Board of Directors, L.A. Architect
Board of Directors, West Hollywood Urban Conservation League
Historic Resources Committee, American Institute of Architects, L.A. Chapter
Board of Directors, Hollywood Media District BID
Member, Mayor’s Advisory Committee on the Arts
Member, Victorian Society in America
Organizer, Fourth World Congress on Art Deco, Los Angeles (1995-97)
Featured Speaker, 2nd World Congress on Art Deco, Perth Australia (1993)
Featured Speaker, World Congress on Art Deco III, Brighton, England (1995)
Speaker, 5th World Congress on Art Deco, Napier, New Zealand (1999)
Key Speaker, Sixth World Congress on Art Deco, Tulsa Oklahoma (2001)
Graduate, with honors, Victorian Society Alumni Summer School, Glasgow, Scotland
“The Search for Art Deco in London,” 1987 “Footnotes,” Los Angeles Conservancy
Hollywood Be Thy Name, 1988, Art Deco Society of Los Angeles

Santa Monica's Art Deco Architecture, 1988, Art Deco Society of Los Angeles
West Hollywood's Period Revival Architecture, 1991, Art Deco Society of Los Angeles
The Bungalows, 1991 monograph
"The Craftsman Bungalow in Australia and New Zealand," 1995, American Bungalow Magazine
Your Neighborhood--A Very Special Place, 1996 monograph
Lafayette Square Historic Homes, 2000 monograph
Historic Hotels of America, KCET TV
"Sightings, w/ Mary Lou Gelbhard," Australian Broadcasting Commission
Doug McIntyre Show, KTZN Radio, Los Angeles
Larry Mantle Show, KPPC Radio, Los Angeles
"Life & Times," KCET TV
NBC Today Show
"Interior Motives," Discovery Channel
Visiting with Huell Howser, KCET TV
1997 Women in Leadership Award, West Hollywood Chamber of Commerce & West Hollywood Women's Advisory Council
Los Angeles Conservancy Preservation Award 2000 for Dominguez Wilshire Building
"Tulsa Times," OETA Public Television
"L.A. Commons" (Cable Access)
Helga Sitkin Show, American Radio Network
Chef Jaime Show, KABC Radio
Featured Speaker, 12th World Congress on Art Deco, Napier, Havana, Cuba (2013)
Featured Speaker, 15th World Congress on Art Deco, Buenos Aires, Argentina (2019)

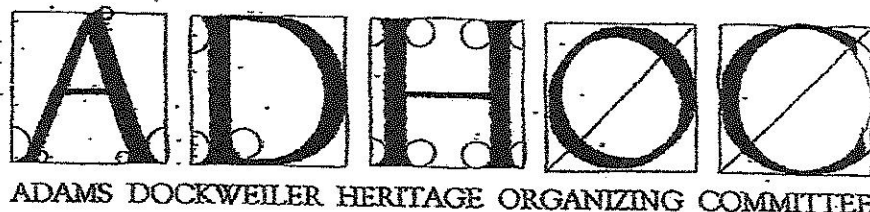
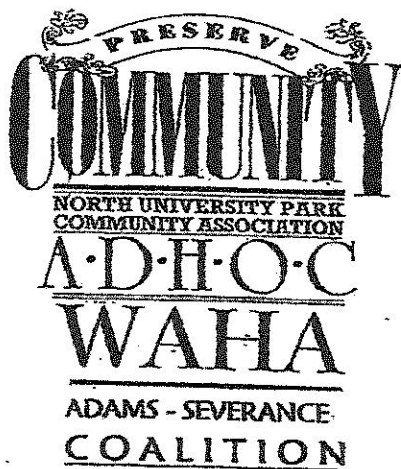
Communication from Public

Name: Jim Childs

Date Submitted: 04/05/2022 03:09 AM

Council File No: 19-1603-S1

Comments for Public Posting: Please accept this background material on the Community Redevelopment Agency (CRA/LA) and the Hoover and Adams Normandie 4321 Project areas. The site at 806 West Adams is within the Hoover Exposition University Park Project Area and the Adams Normandie Project Area is contiguous to the north of the subject site. All Redevelopment Projects are fundamentally a specific plan overlay zone. The project's area rules supersede the LAMC in order to fight blight and mitigate negative impacts. The Hoover Project in its 1983 report set goals to provide housing for various age, income and ethnic groups of the community; alleviate overcrowded substandard housing conditions; and develop a sufficient number of housing units for low- and moderate-income households. This project does not meet Plan goals and should have environmental review. Please continue to support the WAHA Appeal. .



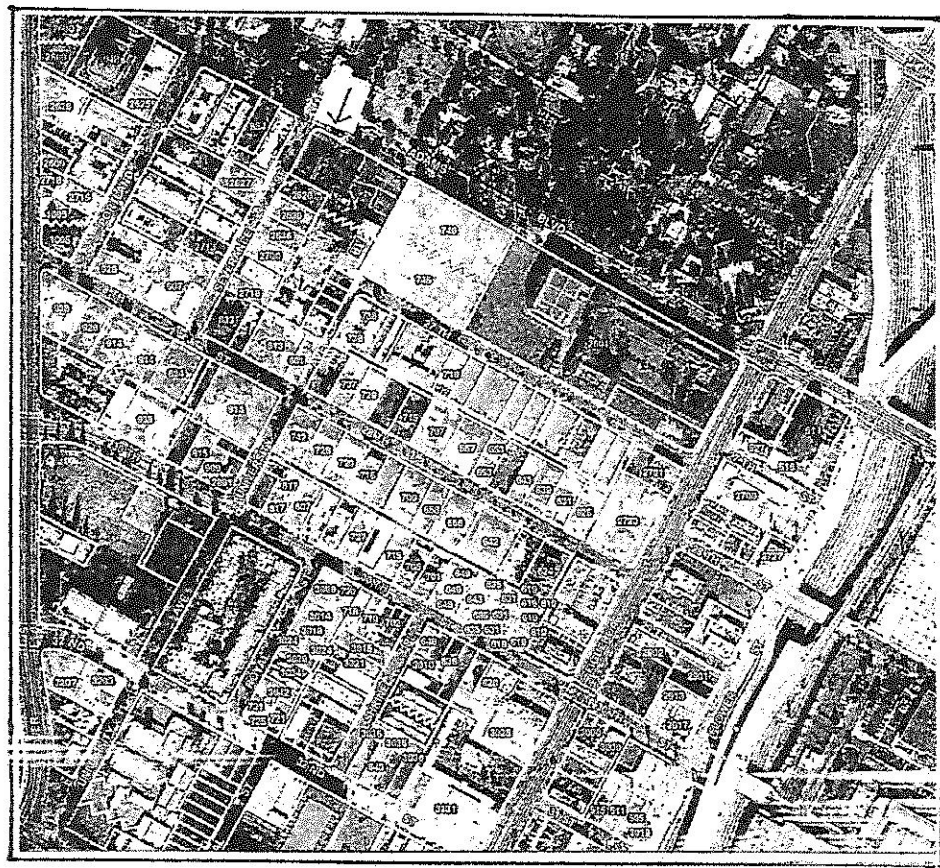
Case No.
DIR-2020-4338-RDP-1A
CEQA No.
ENV-2018-2454-CE;
CF 19-1603-S1

Project Site:
806 W. Adams Blvd.

PUBLIC HEARING:
Tuesday, April 05, 2022
Planning and Land Use
Management Committee
Telephonically by Zoom

Planning Staff,
Rafael Fontes / 231-978-1189
Email: Rafael.fontes@lacity.org

Project Description:
185,985 square feet
102 five-bedroom apartments
7 four-story buildings
259 vehicle parking spaces



CRA/LA. HOOVER REDEVELOPMENT PROJECT AREA
(aka Exposition / University Park Redevelopment Project)

Honorable members of the Planning and Land Use Management Committee (PLUM),

I am a Los Angeles historic-preservation consultant. I was appointed in 2000, by the Los Angeles Cultural Heritage Commission (CHC) as their representative to serve on the University Park Historic Preservation Overlay Zone Board. Prior to my service on the UP-HPOZ Board I was an elected "business representative" to the **CRA/LA Adams-Normandie 4321 Project Area's Project Area Committee (PAC)**. I served for 12-years as Chair of the AN-4321 Housing and Planning Committee.

The CRA/LA Adams-Normandie 4321 Project abuts the CRA/LA Hoover Project along its northern boundary of Adams Boulevard. There were very few differences between the two project-sister's application of: underlying land-use designations, CEQA

compliance, the Secretary of the Interior's Standards and the administrative Goals and Objectives.

The policy and practice of the Housing and Planning Committee was to review ALL permits within the Project Area for which a CRA sign-off was required. The through permit review was to ensure that proposed projects were indeed "in compliance" with the CRA/LA responsibilities.

All redevelopment projects are fundamentally a specific-plan overlay zone. Most overlay zones are administratively created to allow for variations from normal code requirements in order to mitigate potential negative impacts to the identified resource. Because there can be confusing differences about applicability when reviewing project cases that require B&S as well as CRA sign-offs experience is a welcomed perspective.

I have had responsibility to render opinions and decisions regarding issues of compliance with: CRA/LA land-use, CEQA, the Secretary of the Interior's Standards and Preservation-Restoration Guidelines. It is my finding that the proposed Project at 806 W. Adams Boulevard is not in compliance with the fundamental requirements of the Hoover Redevelopment Project Area as required by law.

For those who may be unfamiliar with the Hoover Redevelopment Project I am including material from their: "*CRA/LA Hoover Redevelopment Project 1988 1989 Biannual Report*". The Report provides the important CRA/LA policy objectives that were established for the Hoover Project's 1983 incorporated sub-areas:

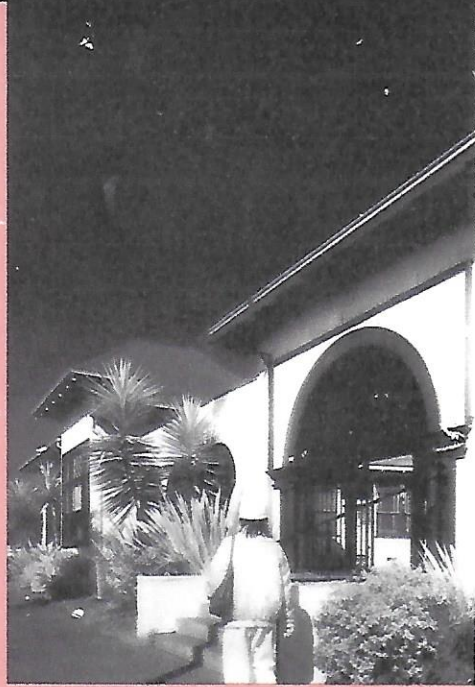
- **To eliminate and prevent the spread of blight and deterioration, and to conserve, rehabilitate and redevelop the area.**
- **To provide housing for various age, income and ethnic groups of the community; to alleviate overcrowded, substandard housing conditions; and develop a sufficient number of housing units for low-and moderate-income households.**

The Report also provides important data on several residential development projects that have relevance to the proposed 806-Project. One project is for; "137 residential units for very low-and moderate income large families. Two apartment buildings, each with a subterranean garage, will provide a total of:

21 one-bedroom units, 80 two-bedroom units, 32 three-bedroom units, 3 four-bedroom units, 1 five-bedroom unit

The one-and four-story buildings will complement the existing low-rise housing stock along 40th Street as well as the mid-rise composition of King Boulevard. Each unit will include a private patio or balcony, A separate community building with an adjacent play area will be located in the center of the site between the two major buildings"

This practical variation in the size of available units is a far cry from the excessively exploitive **102 5-bedrooms** proffered by the 806 Project.



Community
Redevelopment
Agency
of the City of
Los Angeles

Project Background

Hoover is a 739-acre redevelopment project located just southwest of downtown Los Angeles. The original project, established by the Los Angeles City Council in 1966, covered 165 acres surrounding the campus of the University of Southern California. The project boundaries were subsequently expanded in 1983 to incorporate three sub-areas: the Vermont Avenue commercial corridor, Exposition Park, and the Figueroa Corridor (which includes USC's fraternity/sorority row). An additional 3 acres, adjacent to the Vermont Avenue commercial sub-area, were incorporated in 1989 in order to allow for the development of a community shopping center.

The Hoover community is comprised of a multicultural and economically diverse population. This demographic composition includes a large number of low- and moderate-income families, USC students and faculty members, and young professionals who are making a commitment to preserving the architectural and historical heritage of the community by purchasing and restoring turn-of-the-century homes.

Introduction

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The Hoover community is comprised of a multicultural and economically diverse population. This demographic composition includes a large number of low- and moderate-income families, USC students and faculty members, and young professionals who are making a commitment to preserving the architectural and historical heritage of the community by purchasing and restoring turn-of-the-century homes.

There are several major cultural and educational institutions located in the area that have a significant impact in the community. These include the University of Southern California, the Shrine Auditorium, the Los Angeles Memorial Coliseum and Sports Arena, the California Museum of Science and Industry, the County Museum of Natural History, and the California Afro-American Museum.

The Agency's commitment to addressing the diverse and sometimes conflicting needs of this complex community has been the driving force for revitalization in the Hoover Redevelopment Project.

History

At the turn of the century, the Hoover community was characterized by many stately homes and thriving neighborhood shops that surrounded the campus of the University of Southern California. However, by the mid-sixties, the neighborhood started showing signs of disrepair. Some residences and many of the commercial structures had deteriorated. Public facilities designed for a single-family neighborhood had become outdated and overcrowded. These blighted conditions, together with the need to expand the university campus, led to the establishment of the Hoover Redevelopment Project on January 27, 1966, by the Los Angeles City Council. Seeking to encourage and promote new development, the Plan, as adopted, called for acquisition of land, demolition of existing structures, and redistribution of parcels in a major portion of the project area.

Project Boundaries

The Hoover Redevelopment Project is located on the east side of the city, between Adams Boulevard and the south.

Project Goals and Objectives

Additional objectives, established for the sub-areas incorporated in 1983, are as follows:

To eliminate and prevent the spread of blight and deterioration, and to stabilize and redevelop the area.

To eliminate and prevent the spread of the disease, the area must be conserved, rehabilitate, and redevelop the area.

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To eliminate and prevent the spread of disease and conserve, rehabilitate

To eliminate and prevent the spread of blight and deterioration, and to conserve, rehabilitate, and redevelop the area.

To encourage the cooperation and participation of residents, property owners, business persons, public agencies, and community organizations in the revitalization of the area.

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Housing

Hoover and Figueroa streets. The development program provides for 137 residential rental units for very low- and moderate-income large families. Two apartment buildings, each with a subterranean garage, will provide a total of 21 one-bedroom units, 80 two-bedroom units, 32 three-bedroom units, three four-bedroom units, and one five-bedroom unit. The one- and four-story buildings will complement the existing low-rise housing stock along 40th Street as well as the mid-rise composition of King Boulevard. Each unit will include a private patio or balcony. A separate community building with an adjacent play area will be located in the center of the site between the two major buildings.

Villa del Coliseo
Construction is underway on Villa del Coliseo family rental apartments. The development is located on Martin Luther King Jr. Boulevard between Hoover and Figueroa streets. The development program provides for 137 residential rental units for very low- and moderate-income large families. Two apartment buildings, each with a subterranean garage, will provide a total of 21 one-bedroom units, 80 two-bedroom units, 32 three-bedroom units, three four-bedroom units, and one five-bedroom unit. The one- and four-story buildings will complement the existing low-rise housing stock along 40th Street as well as the mid-rise composition of King Boulevard. Each unit will include a private patio or balcony. A separate community building with an adjacent play area will be located in the center of the site between the two major buildings.

Twenty-eight units will be used as replacement housing for the Hoover Redevelopment Project and the balance of 109 units will be used as Convention Center replacement housing. Thirty percent of the total units will be restricted to occupancy for very low-income families, and the remainder will be restricted to moderate-income occupancy. Coliseo Partnership, the developer, is a joint partnership of the Bedford Group, United Housing Preservation Corporation, D&S Development Corporation, and P.O.Z. Village Development Corporation, a non-profit development corporation affiliated with the neighborhood based Praises of Zion Church. Construction is scheduled for completion by April 1991.

Coliseum Apartments
Construction activity has begun on Coliseum Apartments, a seven-unit rental apartment complex located at the northwest corner of Hoover Street and 40th Place. The development, which is designed to accommodate large families, will include two four-bedroom units, two three-bedroom units and three four-bedroom units. The units are designed as townhouses with a Mediterranean motif. All seven units will be restricted to very low income occupancy and will be part of the Agency's program to replace housing units removed to make way for expansion of the Convention Center. The developer is L.A. Family Housing Corp. Construction completion is scheduled for Spring 1991.

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Developments Proposed or Under Negotiations

Housing

Wisconsin Apartments
Faithful Central Missionary Baptist Church, in conjunction with the Community Design Center, has responded to the Notice of Program Availability (NOPA) for Citywide Family/Large Family Housing. The group anticipates constructing 11 units for low income families on a site located at the corner of Wisconsin and 30th Street. Close to \$400,000 in Agency funds has been awarded to the developer to begin preparation of designs, acquisition of land, and other predevelopment costs. The developer is also investigating the possibility of developing additional housing on nearby properties.

Union Square Faculty Housing
USC Real Estate Development Corporation and Hebrew Union College are jointly proposing to develop 130-160 residential units for faculty and university staff on underutilized Hebrew Union College land, located at the corner of 30th Street and Hoover Street. Approximately 75 of the residential units will be sold as condominiums and the remainder will be rented. Twenty percent of the units will be reserved for persons of low income. It is anticipated that the Agency will consider the proposal within the next several months. Construction is projected for late 1990.

Cultural/Institutional

L.A. Child Guidance Clinic
Agency staff is currently providing teacher the development of a new L.A. Child Guidance Clinic at 746 W. Adams Boulevard and providing therapy for individual and group unable to cope in a regular learning environment. Construction is anticipated to begin.

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Citizen Participation

Since the inception of the Hoover Redevelopment Project in 1966, the Agency has worked closely with the community through the Hoover Urban Renewal Advisory Committee (HURAC) and the Project Area Committee (PAC), which was established when the project was expanded in 1983.

HURAC

The Hoover Urban Renewal Advisory Committee is a group of community members appointed by the Mayor to advise the Agency of the community's needs in the original project area. Rather than observing a regular meeting schedule, HURAC meets as issues arise.

PAC

Under the chairmanship of Michael D. Thomson, the community elected Project Area Committee has served as an advisory group on all matters affecting the project area incorporated in 1983. The PAC is composed of property owners, residential tenants, business persons, and community organization representatives. Project area meetings are held monthly to discuss specific issues ranging from design guidelines for development to the review of specific development proposals. The Agency strongly supports all efforts to maintain a regular dialogue with those most affected by redevelopment. Over the years, the assistance and active involvement of community members has proved invaluable in achieving the Agency mission.

14

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As a former member of a CRA/LA Project Area Committee with over a dozen years reviewing CRA/LA projects in the North University Park community I can categorically state that the proposed 806 Project fails to meet several of CRA/LA compliance requirements.

Among them is the fact that this massive Project dominates the historic setting and context, as such it is therefore NOT in compliance with the Secretary's Standards and therefore cannot be CEQA Exempt.

Please decide to again reject the City's proposed Categorical Exception and require a new CEQA review with either an MND or and EIR as Planning Staff has recommended.

Please support the Appeal by Jean Frost and WAHA.

Jim Childs, Chair ADHOC.
2314 Scarff Street, University Park, LA 90007
213/748-1656 / jeanjim2341@att.net