

Communication from Public

Name: Jim Childs

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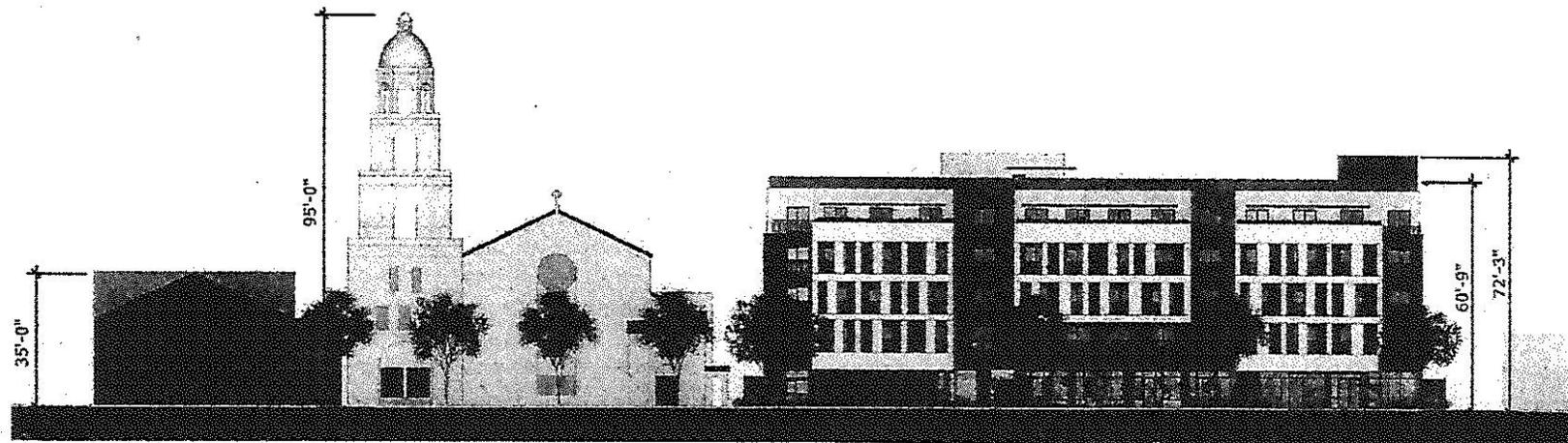
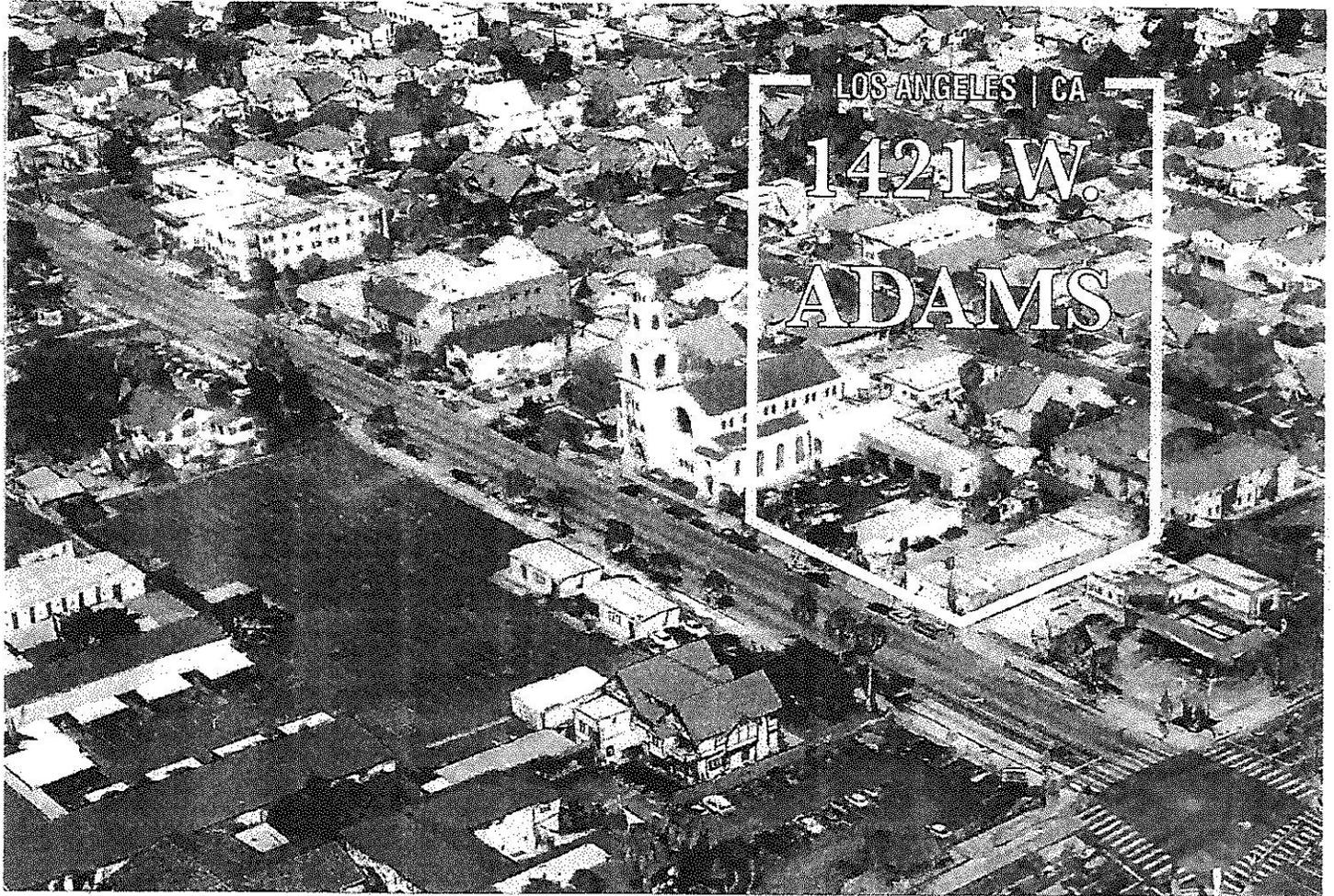
Council File No: 20-0328

Comments for Public Posting: As the appellant in this CEQA case, we urge the City Council to find that a categorical exemption is not the appropriate level of environmental review for a project that is highly discretionary, is in a historically sensitive environment, located on a scenic highway, and fails to meet the objectives of the Adams-Normandie Preservation Plan. The use of a CE, pursuant to Article 19, Section 15332, and Class 32 of the State CEQA Guidelines cannot be sustained by a clear factual analysis because:

- The proposed project does not conform to the Adams Normandie Preservation Plan
- The proposed project does not conform to the Secretary of the Interior's Standards And therefore will cause substantial and adverse changes

Attached is a summary of the appeal points, findings and information on the significance of the adjacent First AME Zion Cathedral which will be negatively impacts is this project proceeds as currently designed.

NORTH UNIVERSITY PARK COMMUNITY ASSOCIATION'S APPEAL
Appeal: Planning Director's Determination: Approve a Certificate of Compatibility-CCMP
Case No. DIR-2019-2727-CCMP-1A / CEQA: ENV-2019-2728-CE
1421-1439 West Adams Boulevard / CD-8 / Adams-Normandie H.P.O.Z.



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Project: 45-units (5-low), 127 bedrooms, 5-stories high, 3-lots wide, 2-level 70car-subterranean parking, roof-decks, gym, 250 USC students.

APPEAL POINTS: Facts and Appellant issues

- Subject property located: Adams-Normandie Historic Preservation Overlay Zone AN-HPOZ.
- All exterior work must be consistent with the AN-HPOZ Preservation Plan, ANPP, to be approved as Certificate of compatibility.
- The Project is NOT consistent and therefore does NOT comply with the ANPP and therefore NOT with CEQA.

- AN-HPOZ Board lacked the required 3-member quorum (3 of 5) to fulfill their review of the project with community input.
- Project design was reviewed and approved by Planning's downtown Office of Historic Resources staff absent required local public hearings. The AN-HPOZ Board was denied their active review participation by OHR staff, 10/02/19.

- OHR staff chose to review the Project design's for compliance with ANPP as "Commercial In-Fill" guidelines (chapter 11) because of its "location".
- Project is "65,140 square feet... a total of 3,640 square feet of commercial retail space at the ground level... The "Commercial" proportional use of the Project is only 5% of the building use.

- OHR staff also cherry-picked from ANPP Residential In-Fill (chapter 9) to support their claim of consistency because it is a "mixed-use" project.
- The mixed-use commercial buildings of yesterday were typically 1st-story retail and 2nd-story offices or apartments. There are still dozens of such historic structures throughout the North University Park. This five-story Project is not a commercial building. It is a residential building with a required token business used to qualify and benefit as a mixed-use project.

FINDING B

- **ANPP # 9.4.1. New residential structures should harmonize in scale and massing with the existing historic structures in the surrounding blocks.**
 - The Director acknowledges that the streetscape's historic structures are one to three stories tall and that the abutting historic church is 55 feet to the roof ridge of the sanctuary, and that the project is a five story structure measuring 60feet."
 - That the Director could Find this new infill project, which is taller than the 90-year old landmark church and three to four stories higher than the surrounding historic structures, is considered to be in compliance with the Guideline is a flight of fantasy

- **AANP # 11.2.2. New structures should reflect the traditional widths of historic structures in the area. If a structure is proposed that is wider than most historic structures along a street the new structure should be broken into appropriately sized modules.**
 - Throughout the written Findings where many of his non-compliant violations are acknowledged the Director has established the reoccurring mantra: "However, the.... (please insert obfuscating justifications)... will be minimized through modulated massing." as a catchall for the proposed design mitigations to achieve compliance.
 - There are NO historic 3-lot wide, 4-story, 5-story commercial or residential buildings in the AN-HPOZ.

- **ANPP # 9.3.7. The lot coverage for an in-fill project should be substantively consistent with the lot coverage of nearby Contributor proprietries**
 - Average lot area is 7,768 the Project is 21,580.
 - Average lot coverage is 51% the Project is 75%,

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- Average footprint is 4,055 the Project is 16,150.
- **ANPP # 9.4.1. New residential structures should harmonize in scale and massing with the existing historic structures in the surrounding blocks.**
- Average number of stories is 2 the Project has 5.
- Average approx. height is 26' the Project is 72'-3".
- Average setback is 15', the Project is 5'-6".

- First AME Church: African Methodist Episcopal Zion Cathedral & Community Center
- Los Angeles Historic-Cultural Monument # 341
- West Adams Blvd. A City Scenic Highway
- **ANPP: # 11.2.1. Where varying setbacks exist, new construction should attempt to function as a buffer by providing a variable setback.**
- The Director allows the Project to have a commercial front setback rather than a normal residential 15' setback. He reports; "the proposed front setbacks will help to ensure that the structure is aligned with the First AME".
- The inept act of placing this hulking 5-story, 3-lot wide apartment building in line with the front facade of First AME effectively and completely blocks the view of the Church from the westbound travelers along Adams Boulevard, a City Scenic Highway. It will also impair the eastbound travelers as the massing of the Project is well above the roof ridge and altar's the tower silhouette.
- First AME is not a commercial building it is a religious-institutional use and should never be construed as an appropriate baseline for an abutting building' setback unless that building was of the same use.

- The Project's Historic Resource Evaluation Report (Kaplan Chen Kaplan).
- **The construction of the proposed building to the side lot line will not impact the setting or the historic significance of the First AME Zion Church which was constructed on an urban parcel along a commercial corridor."**
- Adams Boulevard was and is NOT a "commercial corridor" it was NOT in 1904 when the original Church was built, it was NOT in 1928 when the First AME Church was built, and is NOT today. Residential housing along Adams continues today as it has since the 1880's. The applicant's building itself is a "residential" apartment built with a ground floor commercial space.
- The Case-File for the Project did not have a Light and Shadow study for the relationship between the Church's stain-glass windowed east façade and the Project's towering west façade.
- The Church's eastern nave-aisle-wall has a row of tall arching stain-glass windows and above are stain glass clerestory windows. A 60' high wall aligned with the Church's front east facade will most certainly and most negatively impact the religious services that they were conceived for.
- The glory of the sun's rising morning light is celebrated by the faithful through its collection and focus of the church's glass windows. They are intended to inspire the congregation with god's wonderful gift of light. The windows come in all matter of design but their placement is to allow the sun to shine inward, for both the illumination of the interior and of the soul.
- When a new proposed project interferes most significantly with this process it must be evaluated as a negative impact. It hasn't been and it must be done.

FINDING C

- **The proposed project is categorically exempt from the California Environmental Quality Act (CEQA) pursuant to Article 19 Section 15332, Class 32 of the State CEQA Guidelines**
- The use of a CE, pursuant to Article 19, Section 15332, and Class 32 of the State CEQA Guidelines cannot be sustained by a clear factual analysis because: 1. The proposed project does not conform to the Adams Normandie Preservation Plan. 2. The proposed project does not conform to the Secretary of the Interior's Standards, and therefore will cause substantial and adverse changes.

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TO: LOS ANGELES CITY COUNCIL

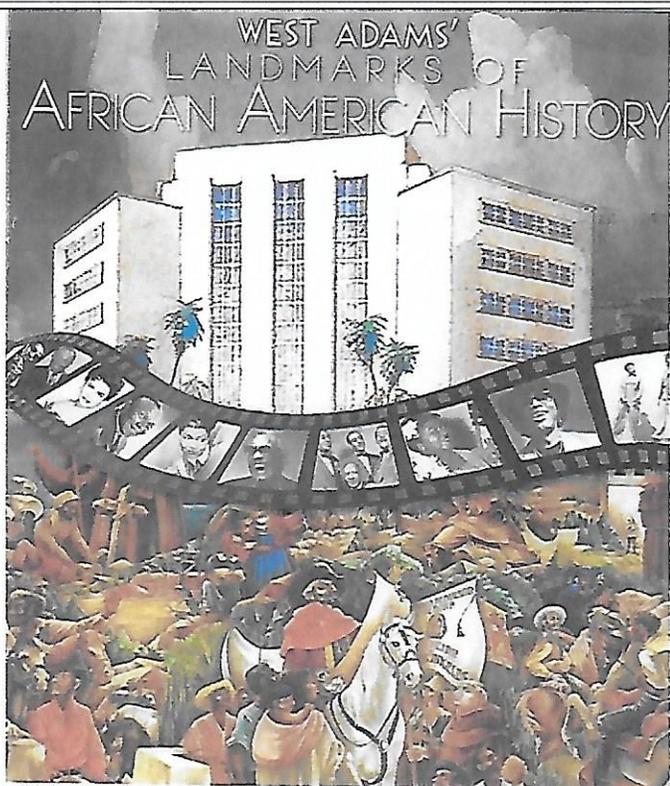
PLANNING AND LAND USE COMMITTEE

RE: CF 20-0328, 1421 WEST ADAMS BOULEVARD

WAHA supports the CEQA appeal and submits to you materials from its "West Adams Landmarks of African America History" publication which underscores the significance of the First AME Zion Cathedral and Community Center which will be significantly impacted if the 1421 West Adams project proceeds in its current design.

That the City has issued now a CE is not permissible under CEQA. CEQA sets a very low threshold for not permitting a Categorical Exemption, namely that it should not be used where there is a reasonable possibility of the activity having a significant effect.

The effects of this massive project on the Cathedral have not been adequately evaluated nor studied and we urge the City to support the appeal and commence environmental review under CEOA.



A PUBLICATION OF THE WEST ADAMS HERITAGE ASSOCIATION

WAHA
West Adams Heritage Association

FIRST AFRICAN
METHODIST-EPISCOPAL
ZION CATHEDRAL
AND COMMUNITY CENTER
1449 WEST ADAMS BLVD.

In early 1904, three West Adams area Presbyterian congregations merged, and soon hired architect H. M. Patterson to design a new, Gothic-inspired church near the corner of Adams Street and Vermont Avenue. In 1928, another cornerstone was laid for what is now the larger sanctuary building, also designed by Patterson along with architect George W. Kelham. This church complex eventually housed one of the earliest African American congregations in Los Angeles. No single institution was of greater importance to the social history of African Americans than the church, which was not only a center for religion but also for important political meetings and social gatherings. The First African Methodist-Episcopal Zion church was organized in Los Angeles in the early years of the 20th century, and like many Eastside congregations it eventually moved west. After renting for several years, First AME Zion purchased the sanctuary



and community center buildings in 1973. Unfortunately, in 1997 it was the victim of a hate-based crime, a purposefully-set fire that did more than \$1 million in damage. The Disney Corp. was one of many entities that donated funds for the institution's restoration.