

Communication from Public

Name: Jean Frost for NANDC

Date Submitted: 01/16/2023 02:33 PM

Council File No: 22-1055-S1

Comments for Public Posting: NANDC supports the appeals by the West Adams Neighborhood Association and the USC Forward Coalition. There is substantial evidence in the administrative record to support the Appellants' allegations that the City has erred in its judgment for purposes of CEQA and the use of the Class 32 Categorical Exemption and in its finding that the Project is consistent with the applicable zoning regulations. In addition, the City has failed to analyze the cumulative impacts of the proliferation of student housing in the area. The Empowerment Congress North Area Neighborhood Development Council (NANDC) Board discussed the development proposal for 1840-1848 West Adams Boulevard on November 5, 2020 at its General Board Meeting and at the Policy/Joint Board Committee meeting on October 27, 2020. By motion, the Board opposes the small lot subdivision and 10-unit development as currently proposed as it is incompatible with the community character due to its size, design, excessive room count, and overall architecture and failure to comply with established community plans. A categorical exemption is not adequate environmental review as the record shows. The Policy Committee had extensive discussion with the developers' representative at its Policy Committee meeting on October 27, 2020. The ten units include 96 bedrooms and the counter per each of the units was not clearly explained. The design fails to meet any of the requirements of the CPIO and the South Community Plan. "The Plan contains policies that ensure that new construction and the rehabilitation of existing buildings is of high quality architectural, landscape and environmental design. Projects should contribute to reinforcing the distinctive and historical character of the corridors and the residential communities they serve." (South Community Plan, "Revitalize Corridors and Preserve Neighborhood Character," 3-6) 1. The City and SAPC erred in their determination, based on the whole of the administrative record, that the Project is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines, Article 19, Section 15332, Class 32. There is substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies. 2. The City Cannot Rely on a Categorical Exemption when mitigation measures are required. The South

Area Planning Commission conditioned the tract map approval with the mitigation that the developed small lots be for sale, which is an unlawful attempt to mitigate a project in violation of CEQA. 3. Decisions must be fact-based. The statement that “there is no substantial evidence in the record demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines Article 19, 15399.2 applies” contradicts what the administrative record and the testimony at the VTT and SAPC hearings clearly establish. The exemption pursuant to CEQA Guidelines 15332 does not apply because the project falls within the exception under Section 15300.2. When one examines the whole of the administrative record it is clear, given all of the record, a categorical exemption is not the appropriate level of environmental review for a project that is discretionary, is in a historically sensitive environmental, located on a scenic highway, and fails to meet objectives of the community plan and the subdivision map act. The project will have a demonstrable significant effect on the environment and does not qualify under Article III, Class 32 exemption. Substantial Evidence Standard The record shows that substantive fact-based arguments have been made by an entire phalanx of stakeholders which include city officials and experts, including WANA, NANDC, WAHA, the ACCE, the Greater Page Temple, NUPCA, NANDC, two former presidents of the neighborhood council, and scores of individual stakeholders that have given factual, eyewitness testimony. And yet the City continues to bury its head in the sand and approve what flies in the face of the facts. So often in their rebuttal to the appeal to the SAPC, staff answered questions not asked in the appeal and set arbitrary and capricious standards that do not reflect the thresholds for a CE under CEQA. This project IS an exception to the exemptions. There ARE unusual circumstances. The site is within a Community Plan Implementation Overlay. It is adjacent to the historic Charles Victor Hall Tract which is within a character residential CPIO. It is on Adams Boulevard, a City scenic highway. It abuts the historic Greater Page Temple. The circulation and parking issues are exacerbated by the main access being via a 20 foot alley. There are impacts to the surrounding properties and streetscapes.



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North Area Neighborhood Development Council
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Area 3
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At Large
Representative

Nina Womack
At Large
Representative

Cindy Gaete
At Large
Representative

Christopher Perez
USC Interest
Representative

Jim Childs
Business
Representative

November 10, 2020

Department of City Planning
200 N. Spring Street
LA, CA 90012
ATT: Sergio Ibarra (Sergio.Ibarra@lacity.org)

Via email

RE: 1840 1848 West Adams Boulevard, VTT-83081-SL-HCA, 10 unit small lot subdivision,

Rep: Nevis Capital LLC, Scott Yang

Dear Mr. Ibarra:

The Empowerment Congress North Area Neighborhood Development Council (NANDC) Board discussed the above referenced development proposal on November 5, 2020 at its General Board Meeting and at the Policy/Joint Board Committee meeting on October 27. By motion, the Board opposes the small lot subdivision and 10 unit development as currently proposed as it is incompatible with the community character due to its size, design, excessive room count, and overall architecture and failure to comply with established community plans.

The Policy Committee had extensive discussion with the developers' representative at its Policy Committee meeting on October 27. The ten units include 96 bedrooms and the counter per each of the units was not clearly explained. The design fails to meet any of the requirements of the CPIO and the South Community Plan. "The Plan contains policies that ensure that new construction and the rehabilitation of existing buildings is of high quality architectural, landscape and environmental design. Projects should contribute to reinforcing the distinctive and historical character of the corridors and the residential neighborhoods they serve."¹

The proposed project fails to reinforce the character of the Charles Victor Hall Tract in which the project is located, identified as a historic area by the Community

¹ South Community Plan, "Revitalize Corridors and Preserve Neighborhood Character," 3-6



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Redevelopment Agency and in the South Community Plan as a character residential CPIO. The development also has serious impacts on traffic, parking and circulation.

The Policy Committee recommended that the Board reject the project as proposed (8-0-0) and the NANDC Board unanimously adopted the Policy Committee recommendation on November 5, 2020.

NANDC is a self-governed, self-directed and independent organization empowered by the Los Angeles City Charter. This charter offers neighborhood councils a role in the City's decision-making process. NANDC was certified by the City of Los Angeles on April 27, 2002 and was the 24th neighborhood council formed under the guidelines of the City Charter. We urge the Deputy Advisory Agency reject this proposal.

Sincerely,

A handwritten signature in blue ink, appearing to read "Thryeris Mason". The signature is fluid and cursive, with a long horizontal stroke at the end.

Thryeris Mason, President

Cc: Councilmember Marqueece Harris-Dawson.
Albizaal Del Valle CD8
Kristen Gorden CD8
NANDC Board
Scott Yang, Nevis Capital LLC

Communication from Public

Name: Jim Childs for NUPCA

Date Submitted: 01/16/2023 02:50 PM

Council File No: 22-1055-S1

Comments for Public Posting: NUPCA was founded four decades ago with the specific mission and purposes of building community and protecting both historic resources and the character of the community in the University Park neighborhoods. Along with efforts to establish the University Park HPOZ, NUPCA successfully advocated for the establishment of the North University Park Specific Plan and DRB, and for the creation of the two designated National Register Historic Districts (the Menlo Avenue West 29th Street District and the North University Park District). We are commenting on the tract map request and project because it has significant impacts to historic Adams Boulevard, the Greater Page Temple and the historic Charles Victor Hall tract. The City and SAPC approved this Project upon a Class 32 categorical exemption to environmental review under CEQA. This categorical exemption is inappropriate because the Project is inconsistent with the applicable City plans; would result in traffic impacts due to a severe parking shortage; and would have adverse environmental impacts on the surrounding residential community. The use of a categorical exemption is also unsupportable because the Project may have aesthetic and cultural resource impacts on the historic Charles Victor Hall tract and the adjacent Greater Paige Temple. And most significantly, the project would have negative impacts on Adams Boulevard, a city designated scenic highway. I submitted materials to the record and incorporate these materials by reference from an earlier case that has application here RE: ZA-2018-2453-CU-DB-SPR-1A, DIR-2020-4338-RDP-1A, ENV-2018-2454-CE as it relates to impacts to Adams Boulevard and its significance. In that case, there was misinformation circulated that because it wasn't a state scenic highway, no impacts should be considered. The developer alleged there was no such thing as environmental concern or impacts on a city scenic highway. As stated in the City's adopted Mobility Plan: 2.16 Scenic Highways: Ensure that future modifications to any scenic highway do not impact the unique identity or characteristic of that scenic highway. Scenic Highways include many of the City's iconic streets. Preservation and enhancement of these streets and their scenic resources need to be preserved per the Scenic Highways Guidelines in Appendix B of this Plan. . These referenced materials in the record document existing historic

resources on Adams Boulevard. Please accept this documentation for the administrative record to ensure that as decision makers you are cognizant of the importance of Adams Boulevard as a scenic highway. This can guide the decision-making process for this tract map public hearing. The Project is contrary to the requirements for a Scenic Highway: In addition to failing to meet the requirements of the South Community Plan, the site is on Adams Boulevard which is a City designated scenic highway. The project as proposed is also inconsistent with the goals established by its Scenic Highway designation. (see the Mobility/Transportation Element of the General Plan). Scenic Highways, according to the Mobility/Transportation Element, "include many of the City's iconic streets. Preservation and enhancement of these streets and their scenic resources need to be preserved." Adams Boulevard between Figueroa and Crenshaw is a designated Scenic Highway. The Project as proposed not only ignores this fact, but provides no Adams Boulevard setback and green. Adams Boulevard offers a development pattern with generous landscaped front yards with buildings set back anywhere from 15 feet to more dramatic deep setbacks in some cases (and, yes, there are exceptions.) This Project should respect the pattern of development AND the Scenic Highway designation and point its face toward Adams Boulevard.

2.16 Scenic Highways: Ensure that future modifications to any scenic highway do not impact the unique identity or characteristic of that scenic highway. Scenic Highways include many of the City's iconic streets. Preservation and enhancement of these streets and their scenic resources need to be preserved per the Scenic Highways Guidelines in Appendix B of this Plan. We support the appeal by WANA and USC Forward. The City cannot rely on a Categorical Exemption when mitigation measures are required. Here, the South Area Planning Commission acknowledged that the project appeared to be student housing and added a mitigation to the determination letter's findings that these 10 buildings will be for sale. It underscores that the Commission members had serious concerns about this development and made an effort to mitigate its impact. These are dormitories, not family housing. Jim Childs North University Park Community Association c/o 2326 Scarff Street, LA, CA 90007

· N · U · P · C · A ·
NORTH UNIVERSITY PARK COMMUNITY ASSOCIATION

July 18, 2022

South Area Planning Commission

Via e mail

RE: VTT-83081-SL-HCA, ENV-2020-3308-CE

Honorable Commissioners

NUPCA was founded four decades ago with the specific mission and purposes of building community and protecting both historic resources and the character of the community in the University Park neighborhoods. Along with efforts to establish the University Park HPOZ, NUPCA successfully advocated for the establishment of the North University Park Specific Plan and DRB, and for the creation of the two designated National Register Historic Districts (the Menlo Avenue West 29th Street District and the North University Park District). We are commenting on the tract map request because it has significant impacts to historic Adams Boulevard.

The City is considering approving this Project upon a Class 32 categorical exemption to environmental review under CEQA. This categorical exemption is inappropriate because the Project is inconsistent with the applicable City plans; would result in traffic impacts due to a severe parking shortage; and would have adverse environmental impacts on the surrounding residential community. The use of a categorical exemption is also unsupportable because the Project may have aesthetic and cultural resource impacts on the historic Charles Victor Hall tract and the adjacent Greater Paige Temple. And most significantly, the project would have negative impacts on Adams Boulevard, a city designated scenic highway.

I submitted materials to the record and incorporate these materials by reference from an earlier case that has application here RE: ZA-2018-2453-CU-DB-SPR-1A, DIR-2020-4338-RDP-1A, ENV-2018-2454-CE as it relates to impacts to Adams Boulevard and its significance. In that case, there was misinformation circulated that because it wasn't a state scenic highway, no impacts should be considered. The developer alleged there was no such thing as environmental concern or impacts on a city scenic highway.

As stated in the City's adopted Mobility Plan:

2.16 Scenic Highways: Ensure that future modifications to any scenic highway do not impact the unique identity or characteristic of that scenic highway. Scenic Highways include many of the

City's iconic streets. Preservation and enhancement of these streets and their scenic resources need to be preserved per the Scenic Highways Guidelines in Appendix B of this Plan.

These referenced materials in the record document existing historic resources on Adams Boulevard. Please accept this documentation for the administrative record to ensure that as decision makers you are cognizant of the importance of Adams Boulevard as a scenic highway. This can guide the decision-making process for this tract map public hearing.

The Project is contrary to the requirements for a Scenic Highway:

In addition to failing to meet the requirements of the South Community Plan, the site is on Adams Boulevard which is a City designated scenic highway. The project as proposed is also inconsistent with the goals established by its Scenic Highway designation. (see the Mobility/Transportation Element of the General Plan). Scenic Highways, according to the Mobility/Transportation Element, “include many of the City’s iconic streets. Preservation and enhancement of these streets and their scenic resources need to be preserved.” Adams Boulevard between Figueroa and Crenshaw is a designated Scenic Highway.

The Project as proposed not only ignores this fact, but provides no Adams Boulevard setback and green. Adams Boulevard offers a development pattern with generous landscaped front yards with buildings set back anywhere from 15 feet to more dramatic deep setbacks in some cases (and, yes, there are exceptions.)

This Project should respect the pattern of development AND the Scenic Highway designation and point its face toward Adams Boulevard.



*2.16 Scenic Highways: Ensure that future modifications to any scenic highway do not impact the unique identity or characteristic of that scenic highway. Scenic Highways include many of the City’s iconic streets. Preservation and enhancement of these streets and their scenic resources need to be preserved per the Scenic Highways Guidelines in Appendix B of this Plan.*¹

Jim Childs
North University Park Community Association
c/o 2326 Scarff Street, LA, CA 90007

¹ Mobility Plan 2035, An Element of the General Plan, adopted by City Council 9/7/2016