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December 6, 2022

Department of City Planning
200 North Spring Street
Los Angeles, CA 90012

Case No: VTT-83081-SL-HCA
Address: 1840-1848 West Adams Boulevard
CEQA: ENV-2020-3308-CE

Dear Los Angeles City Council:

The West Adams Neighborhood Association (WANA), the Greater Page Temple Church of God in Christ (Greater Page Temple COGIC), and many residents and stakeholders of the historic Charles Victor Hall Tract respectfully appeal the proposed property known as 1840 – 1848 W. Adams Boulevard as exempt from the California Environmental Quality Act (CEQA) and the Vesting Tentative Tract Map which was denied on or around October 14, 2022.

When one examines the proposed project in its entirety, a categorical exemption is not the appropriate level of environmental review for a project that is discretionary, is in a historically sensitive environment located on a Los Angeles City designated scenic highway, Adams Boulevard as designated by the City in its Mobility Plan 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.

- I. The design and over dense development will result in environmental issues creating a negative effect on the historic residential neighborhood adjacent (officially recognized in the CPIO of the South Community Plan), on the adjacent historic Greater Page Temple COGIC, and the concern is not only regarding the proposed development to be located at 1840-1848 W. Adams Blvd., but the cumulative effects of having multiple high-density barrack style co-living developments within a ¼ mile radius. The current proposed project design will:
 - a. Result in an increase of negative emissions due to the number of vehicles. This common emission is a contributing factor that leads to an increase in smog. The developer has not mentioned providing Electrical Vehicle Charging Stations to help decrease emissions.
 - b. Increase in utility usage such as electricity, water, gas, and trash/waste.

- c. Impede sunlight, which is needed for solar panels and views. Los Angeles is a city that promotes solar panels with the selling point that it will help with the health and well-being of residents, business owners, and the overall community in years to come. Several homeowners have spent a lot of money to add solar panels to their homes for these various reasons including lowering their electricity bills. This project will certainly prohibit the sun from providing and decrease energy and electricity usage.
- d. Result in increased noise due to the anticipated number of residents.
- e. Tripalink does not consider adaptive reuse or mixed-use development that would result in less environmental impact and loss of existing businesses within the community.
- f. While we realize the transmission of COVID-19 which is caused by a coronavirus called SARS-CoV-2 is subject to many variables, it is clear from the data below (provided from the Los Angeles County Department of Public Health) that highly dense neighborhoods have higher transmission rates and can cause higher death rates.

Neighborhood	Cases	Deaths
West Adams	10,422	182
Adams-Normandie	3,059	19
Crenshaw District	4,995	340
Jefferson Park	3,022	23
Pico Union*	15,831	295
Westlake*	19,960	389
East Los Angeles*	56,417	557
Westwood**	15,575	47
University Park**	11,100	78

* High density neighborhoods

** University communities

- g. Overall, these factors are significant when you think about the effects of setbacks. In addition to the above-mentioned points, we must also include the limited accessibility for first responders, the proposed entrance and exit way which is a single 20-foot alleyway, and Los Angeles being vulnerable to natural disasters,

primarily earthquakes in this neighborhood. This development, as of the public hearing held on January 12, 2022, still did not adhere to required setbacks. It is too large for the lot, especially when compared to other residential structures in the neighborhood.

II. Because the CEQA clearance cannot be approved, the **entire case** cannot be approved, and we appeal the decision for these additional reasons:

a. Activities at the Greater Page Temple Church of God in Christ, a contributing historic structure to the CPIO as noted in the Normandie 5 Survey, will be affected adversely due to increased traffic through the alleyway that will provide the main vehicle access to the proposed development. The activities affected include:

1. Daily daycare drop-off and pick-up occurs in the alley.
2. Midweek events in which parking is accessed through the alley.
3. Special events held in the parking lot/ or in which parking is accessed through the alley.
4. Sunday services in which parking is accessed through the alley.

b. The community has health concerns because the number of bedrooms filled by tenants at the existing Tripalink structures and other increased density, oversized apartment and/or co-living structures has created access issues at the only full-service grocery store in the area, Ralphs #294 located at 2600 S. Vermont Ave. The amount of traffic in the parking lot and the amount of people in the store at any given time has become a detriment to grocery shopping for the older and disabled residents of our community and is a nuisance to all residents in the community.

1. Tripalink has stated that they provide a shuttle to Ralphs for residents to use, but that is not a guarantee that all, or even a large percentage of Tripalink residents take advantage of the shuttle service.

c. The community has safety concerns due to the proposed increase in residents and vehicles.

1. The proposed property is next to two double traffic lights that run north and south on La Salle Blvd. On any given day regardless of time, traffic traveling west to east on Adams Blvd will run one or both of these lights. If a vehicle is traveling at a high speed to catch the lights, they are unable to come to a safe stop which is a few feet away from the proposed entrance and exit way. We are already concerned about the possibility of accidents and possible fatalities. Our concern increases due to the number of residents, vehicles including bikes and scooters, and pedestrians.

2. This neighborhood has a limited amount of parking spaces. We were informed in 2021 that Tripalink would provide sufficient parking spaces for their residents. During the public hearing on January 12, 2022, it was stated that Tripalink is only responsible for providing a certain amount of parking spaces due to the location of

the building on Adams Blvd which is a main thoroughfare. We are estimating that parking will only be provided for half of the residents and that will cause further strain on this already sensitive issue.

d. The proposed tract map is not consistent with the South Community Plan which places a high value on infill development being consistent with the community character. The size, scale, excessive room count (96) is contrary to the goals of the South Community Plan. Additionally, the project fails to meet the goals of the small lot subdivision which was intended to promote affordable homeownership.

1. The main purpose/function of Tripalink developments, as described on their LinkedIn business description, is co-housing for students and young working adults who do not intend to rent for extended periods of time. Tripalink advertises their developments as such on their own website and on college/university websites. The renters who do/will occupy units in the Charles Victor Hall Tract do not have the same investment in the community as homeowners and long-term renters.

e. While it was mentioned at the City public hearing on January 12, 2022, and the South Los Angeles Area Planning Commission on July 19, 2022, that the units located at the development would be available for purchase, this was communicated in response to public objection to the co-living dormitory style of the buildings that will provide 96 bedrooms on the small lot. With the recent increase in interest rates and with the Federal Reserve intent to raise interest rates again in 2023, and with none of the units designated as affordable, this development does not contribute to providing affordable or moderately affordable housing in the Charles Victor Hall Tract as defined by local affordability levels.

1. No interior floorplan or design plan was provided at during any of the public hearings to substantiate that the proposed units would be appropriate to be purchased by families rather than to be rented as co-living dormitories.
2. The public is repeatedly told by government leaders and through the media that California has a shortage of housing, especially affordable housing. The Tripalink Corporation doesn't build traditional single family, multiple family, or affordable housing to satisfy the city's Housing Element, yet Tripalink is being granted the most permits to develop dormitory style housing in the South Los Angeles area.

We are concerned residents, business owners, and stakeholders who want to ensure our neighborhood remains an affordable, safe, and family friendly environment for everyone while preserving its historical integrity. The continued overdevelopment in the area by Tripalink is placing the success of one corporation ahead of the needs of local, longtime community members and often violates City of Los Angeles requirements for demolition and development. The City denied our appeal based on an inappropriate CEQA review which we requested during our previous appeal. In conclusion, Councilman Marquece Harris-Dawson, Council District 8 is also opposed to the current state of this proposed project.

I am available by phone and/or a meeting (virtual or in person) if needed to further discuss this matter. I can be reached at Tanishat@wana-la.org or (213) 308-2852. Thank you for taking the time to review our appeal and we patiently await the decision.

Respectfully yours,



Tanisha B. Thomas
President
West Adams Neighborhood Association

c: Letter of Determination
Letter from NANDC 11-9-2021
Letter from WAHA 11-9-2021



Jean Frost
2341 Scarff Street
Los Angeles, CA 90007

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

November 9, 2021

Deputy Advisory Agency
200 North Spring Street, Room 720
Los Angeles, CA, 90012

Att: Rafael Fontes, Planning Assistant
rafael.fontes@lacity.org (213) 978-1189

Dear Sir/Madam:

The tract map before you today should not be granted because the findings required for such approval cannot be made based on the facts before you. The proposal is not in conformance to the adopted plans for the area which include the South Community Plan, the adopted CPIOs, and the Mobility Plan Element which includes the scenic highway, nor can it qualify for a Class 32 CEQA Exemption.

The proposed tract map is not consistent with the South Community Plan which places a high value on infill development being consistent with the community character. The size, scale, excessive room count (96) is contrary to the goals of the South Community Plan. The Community Plan recognizes that this area includes neighborhoods that are "unique and historically significant in character" and thus includes provisions specifically to address compatibility of new development with the existing neighborhood character.

The South Los Angeles Community Plan provides an official guide to the future development of the District for use by the City Council, the Mayor, and the City Planning Commission; other concerned governmental agencies; residents, property owners and businesspeople of the Plan Area, along with private organizations concerned with Planning and civic improvement. One of the objectives for housing in the South Los Angeles Community Plan is to conserve and improve the varied and distinctive residential character of the Plan area. Some of the policies listed in the South Los Angeles Community Plan are as follows:

Historic.

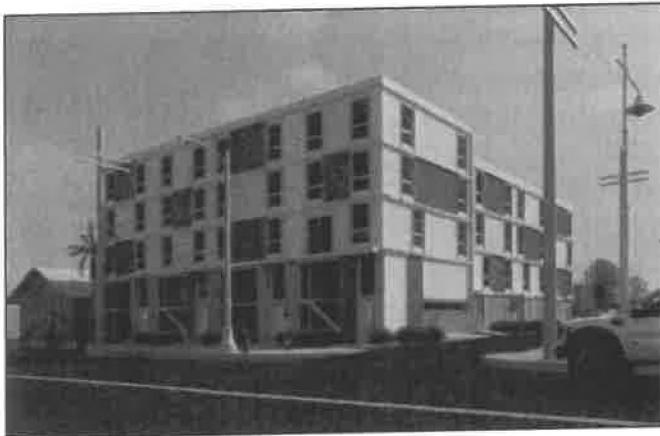
Issues...New development and rehabilitation projects that are sensitive to the character of established historic areas.¹

Neighborhood Character- Preserve and enhance the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks, and appearance. ²

Issues. Scale, density, and character of structures housing adjacent to Historic Buildings...

The need to preserve and rehabilitate historic areas with sensitivity to the character of the established neighborhood.³

This project is a stark unarticulated block designed to maximize the number of bedrooms and profit. Such negative factors – overbuilding, squeezing the maximum number of bedrooms into the volume of the building, and detrimentally changing the historic pattern of development- constitute cumulative impact. To grant a small lot subdivision would be another nail in the coffin of supporting a livable community



A project's reasonably foreseeable effects on established development patterns need to be considered in determining whether there is an adverse effect. Incompatible development patterns are continually being proposed as our low income and communities of color are being monetized, changing the community character and having a chilling effect on the historic neighborhood's ability to demonstrate a sense of place.

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.

¹ South Los Angeles Community Plan, Section I-7

² South Los Angeles Community Plan, Section I-9

³ South Los Angeles Community Plan, Section I-10

The Project as proposed not only ignores this fact, but provides no Adams Boulevard setback and green space and places its entry way on a side street – which is not in keeping with the pattern of development along this Scenic Highway .– and declares the Adams side (north elevation) a “side yard” with a more minimal side yard setback. 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. ⁴

The Project Fails to Meet the Requirements of the CPIOs

The site is within a neighborhood serving corridor Subarea A CPIO, the **Subarea A: Neighborhood Serving Corridor**. The Neighborhood Serving Corridor Subarea allows for a refined range of commercial uses, as well as multi-family residential uses. Development standards promote neighborhood activity and facilitate a more pedestrian-oriented environment. These 96 bedrooms on 10 small lots does not meet this requirement. This project fails to achieve these goals.

The project is within a Subarea A CPIO and is adjacent to the character residential CPIO of the Charles Victor Hall tract which consists largely of two-story craftsman homes. A massive 96-bedroom development on this site with impact the neighboring

⁴ Mobility Plan 2035, An Element of the General Plan, adopted by City Council 9/7/2016

character residential neighborhood in aesthetics, parking, traffic congestion, and health of the residents.

Small Lot Subdivision

The project fails to meet the goals of the small lot subdivision which was intended to promote affordable homeownership. Its goal is to encourage opportunities for home ownership. But alas this was not the result.

“Though the factors contributing to the loss of existing multi-family housing are complex, City’s Small Lot Subdivision Ordinance process is often cited as a primary cause. The ordinance, originally conceived as a way of promoting first-time homeownership, has had a tremendous effect on multi-family neighborhoods. Similar to teardowns and mansionization in single-family residential neighborhoods, these developments represent a growing threat to community character.”⁵

Ten small lots do not serve the purpose nor intent of the Small Lot Subdivision Ordinance nor other applicable Plans.

Severe Impacts

The design and over dense development will result in health and safety problems, parking congestion, and have a negative effect on the historic residential neighborhood and the adjacent, the historic Church (The Greater Paige Temple r.) The issue of parking, traffic and circulation has not been addressed. The environmental review process is the key to ascertaining all the facts so that decision makers can make sound judgments and not impact this historic community negatively.



The City is considering approving this Project upon a Class 32 categorical exemption to environmental review under CEQA. This categorical exemption is inapplicable because the Project is inconsistent with the applicable City plans and 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 unavailable because the Project may have aesthetic and cultural resource impacts on the historic Charles Victor Hall tract and the adjacent Greater Paige Temple.

⁵ Los Angeles Conservancy

Cumulative Impacts

The impacts of this project also need to be viewed in the context of cumulative impacts. At this moment in time, there are various projects in stages of development that create a new "co-living" pattern of development, adding bedrooms or cutting up significant interior spaces into bedrooms, and over building, creating massive lot coverage and significant parking demands, which have the potential to create severe and irreparable damage to historic buildings and neighborhoods. Cutting up two parcels into 10 small lots is contrary to Adams Boulevard's historic configuration and is detrimental to the neighborhood character. ⁶

The South Los Angeles Community plan calls for *Preserving and enhancing the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks, and appearance*. It is entirely possible to develop this parcel with a neighborhood serving commercial development within the stated goals of the CPIO.

Conclusion:

The required findings for approval of a tract map cannot be made. Further, due to the unique circumstances applicable to this site, a CE is legally insufficient to meet the requirements of CEQA and should not be adopted. Should the proponent pursue this subdivision, an Environmental Impact Report should be drafted for the project. the only acceptable mitigation for the project is denial of the subdivision a tract map

Please notify of any hearings or meetings that may take place regarding this project.

Sincerely,



Jean Frost
Area3 Rep NANDC
indiejean@att.net
213 747 2526

⁶ To cite a few of the projects that are in various stages: 1341 W. Adams, 1233 W. Adams, 2833 Menlo. 806 W Adams