

Communication from Public

Name: Roland Souza WAHA

Date Submitted: 10/11/2022 11:00 AM

Council File No: 22-1055

Comments for Public Posting: 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 project is within a Subarea A neighborhood serving commercial 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 will impact the neighboring character residential neighborhood in aesthetics, parking, traffic congestion, and health of the residents. The project fails to meet the goals of the small lot subdivision which was intended to promote affordable homeownership.



October 11, 2022

PLUM

Via email

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

Honorable Councilmembers:

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 project is within a Subarea A neighborhood serving commercial 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 will impact the neighboring character residential neighborhood in aesthetics, parking, traffic congestion, and health of the residents.

The project fails to meet the goals of the small lot subdivision which was intended to promote affordable homeownership.

The project fails to meet the aesthetic requirements of a city designated scenic highway, Adams Boulevard nor the established setback of Adams Boulevard.

The design is not compatible with design guidelines standards for the Community Plan nor is it compatible with the City’s Small Lot Subdivision Design Guidelines.

The site is not suitable for this barrack like type of development nor is the proposed density suitable. 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 adjacent, the historic Church.

This project does not provide family housing or affordable housing that would meet the goals of the City’s Housing Element.

This development does not meet the requirements for a categorical exemption due to its significant negative impacts.

Adams Boulevard is a scenic highway.

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

Given all of the record, "A categorical exemption is not the appropriate level of environmental review for a project that is highly discretionary, is in a historically sensitive environmental, located on a scenic highway, and fails to meet objectives of the community plan and Small Lot Subdivision Ordinances and CPIOs.

The project will have a demonstrable significant effect on the environment and does not qualify under Article III, Class 32 exemption.



The Class 32 "Infill" Categorical Exemption (CEQA Guideline Section 15332), hereafter referred to as the Class 32 Exemption, exempts infill development within urbanized areas if it meets certain criteria. The class consists of environmentally benign infill projects that are consistent with the General Plan and Zoning requirements. This class is not intended for projects that would result in any significant traffic, noise, air quality, or water quality impacts.

The appeal by WANA and the Greater Page should be sustained and the tract map 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.

The City has based its approval of this Project upon a Class 32 categorical exemption to environmental review under CEQA. This categorical exemption is inapplicable because the Project is inconsistent with City plan and zoning policies, goals, and regulations, would result in health and safety impacts. The use of a categorical exemption is also unavailable because the Project may have aesthetic and cultural resource impacts on the historic WANA and Adams neighborhood, at a Project and cumulative level.

West Adams Heritage Association

Roland Souza, President (preservation@westadams.org)
1724 Westmoreland Avenue, LA, CA 90006

¹

Communication from Public

Name: Andrea Rojas

Date Submitted: 10/11/2022 12:51 PM

Council File No: 22-1055

Comments for Public Posting: Hello Councilmembers, My name is Andrea Rojas and I am a constituent of District 8. I support the appeal -- This project is missing using the small lot subdivision program. The small lot subdivision program was not intended to allow developers to have an effect on what is the traditional setting and configuration of parcels in South LA. It was meant to allow homeownership and opportunity for people to buy into what is a pathway to improving their assets and upward mobility. Tripalink is building an enormous project to continue to profit from USC students because USC is failing to provide on campus housing. Tripalink units are not intended for the working class community - they are specifically reserved for USC students. Please do NOT allow Tripalink to develop on 1840 --1848 West Adams Boulevard.
Thank you, Andrea

Communication from Public

Name: Jordan R. Sisson
Date Submitted: 10/11/2022 01:39 PM
Council File No: 22-1055
Comments for Public Posting: See attached revised comment letter with a corrected date. No other changes have been made.



LAND USE, ENVIRONMENTAL & MUNICIPAL LAWYERS

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Oct. 11, 2022

VIA EMAIL & ONLINE WEB PORTAL: <https://cityclerk.lacity.org/publiccomment/>

Planning And Land Use Management Committee, City of Los Angeles
c/o Candy Rosales (clerk.plumcommittee@lacity.org)
Albizaal De Valle, Council District 8 (albizaal.delvalle@lacity.org)

**RE: Item 4, PLUM Special Meeting Scheduled October 11, 2022 (Council File No. 22-1055);
Tripalink Project (1840-1848 W. Adams Blvd.);
DCP Case Nos. VTT-83081-SL-HCA-1A, ENV-2020-3308-CE**

Dear Chair Harris-Dawson and Honorable Councilmembers:

On behalf of USC Forward (“**Appellant**”), this office respectfully submits the following comments¹ on the above-referenced “**Appeal**” involving the above-referenced proposed four-story, 30,218 square foot structure which includes 96 bedrooms each with a dedicated bathroom (i.e., 96 total bathrooms) (“**Project**”), which the applicant Tripalink (“**Applicant**”) claims to be just ten single-family dwelling units.² No reasonable person could conclude that the Project is merely proposing 10 dwelling units—when was the last time you saw a single-family dwelling unit contain more than 9 bedrooms and 9 bathrooms?

There is substantial evidence in the record showing the Applicant’s pattern-and-practice of operating co-living facilities that serve almost exclusively college students near the University of Southern California (“**USC**”) campus. No reasonable person could conclude that the Project will operate as a maximum of 10 single-family dwelling units. Tripalink has a well-established track record of renting each bedroom to USC college students—here amounting to not 10 single-family dwelling units but rather 96 individual student dorms/studios units akin to “efficiency dwelling units,” “dormitories,” or guest rooms in a boarding house. (See LAMC § 12.03 [definitions].)

First, Tripalink is well-known for renting rooms—not dwelling units or single-family homes. This is plainly seen by reviewing the properties listed on Tripalink’s website. (See Exhibit A, attached hereto [providing links to over 23 properties].)

Second, Tripalink has a history of entitling dwelling units but renting rooms like single-room student dorms. For example, at 1815 W. Adams Blvd. (DCP Case No. ADM-2020-2509-CPIOC), the submitted plans showed merely two new, 4-story duplexes with a total of 4 units, each ranging

¹ Herein, page citations are either the stated pagination (i.e., “p. #”) or PDF-page location (i.e., “PDF p. #”).

² Applicant (4/28/20) Application Materials, PDF pp. 4, 7, <https://planning.lacity.org/pdiscaseinfo/document/Nzc00DQ0/4596a256-522b-4c94-acc5-77ce1b3c8ef1/esubmit>; Applicant (3/18/20) Project Plans, PDF p. 2 (Site Plan A1.01), <https://planning.lacity.org/pdiscaseinfo/document/Nzc00DY0/4596a256-522b-4c94-acc5-77ce1b3c8ef1/esubmit>; DCP (2/24/22) Initial Advisory Agency LOD, pp. 14-16, <https://planning.lacity.org/pdiscaseinfo/document/MTg1MzM0/1823a02c-5d95-4003-95c4-258347c32f18/pdd>.


between 2,427 to 2,523 square feet each.³ However, Tripalink now advertises that same project as a “gated community” comprised of 36 rooms—*each individually rentable*—ranging between 664 and 935 square feet, with each one having a dedicated bathroom. (See *Exhibit B, attached hereto* [Tripalink Website screenshots].)

Third, the 96-unit Project exceeds density limits on the Site. Admittedly, the approximate 14,142 square-foot Site is permitted a maximum density of 35 dwelling units.⁴ So too, the Project amounts to roughly 142 square feet per unit, which exceeds the South Los Angeles Community Plan Implementation Overlay District (“**CPIO**”) residential density--both generally (i.e., 1 unit per 800 square feet) and for Transit-Oriented Communities (“**TOC**”) projects (i.e., 1 unit per 400 square feet). (See CPIO,⁵ pp. 32.)

Fourth, the Applicant is incorrect when it claims that the Appeal has been “deemed denied” by operation of law because the City has not acted within 30 days of the Appeal being filed.⁶ The Applicant has made a similar argument about prior appeals being “deemed denied” due to operation by law. However, timelines to act under the Code have been tolled due to the COVID emergency, according to Deputy City Attorney Ernesto Vasquez.⁷ Mr. Vasquez, who served as counsel to both Central and South Los Angeles Area Planning Commissions (“**APC(s)**”), made these statements just three weeks before the South LA APC heard fellow appellants’ initial appeal on July 19, 2022, and in direct response to this office’s concerns about claims of appeals being considered deemed denied.⁸ And, of course, the appeal was heard by APC July 19, 2022 notwithstanding Applicant’s deemed denied argument.

In sum, the Project is inconsistent with applicable zoning regulations and, therefore, ineligible for the claimed categorical exemptions. Please grant the appeal.

Sincerely,



Jordan R. Sisson
Attorney for Appellant

Enclosed: Exhibits A & B

³ DCP Case Summary, <https://planning.lacity.org/pdiscaseinfo/search/encoded/MjM3MzQ50>; Plot Plan, <https://planning.lacity.org/pdiscaseinfo/document/MjMyMzU40/46e6f77e-051c-4e11-ad6d-6ce8558211cd/pdd>; floor plan, <https://planning.lacity.org/pdiscaseinfo/document/MjMyMzU30/46e6f77e-051c-4e11-ad6d-6ce8558211cd/pdd>.

⁴ DCP (4/5/22) Reissued Advisory Agency LOD, pp. 14, 15, 17, <https://planning.lacity.org/pdiscaseinfo/document/MjAzMjM0/1823a02c-5d95-4003-95c4-258347c32f18/pdd>; see also APC Staff Report, pp. A-4 (“As the Vesting Tentative Tract Map meets the technical requirements of the LAMC, including standards for the maximum permitted density, height, and subdivision of land, the proposed map demonstrates compliance with the LAMC as well as the intent and purpose of the General Plan with regard to density and use.”)

⁵ <https://planning.lacity.org/odocument/0e95b194-a2b7-4da2-8346-720f71f59e35/CPIO.pdf>.

⁶ Applicant Letter (10/7/22), p. 1, https://clkrep.lacity.org/onlinedocs/2022/22-1055_misc_10-07-22.pdf.

⁷ DCP (6/28/22) Central APC Agenda, p. 3 (Item 6 regarding appeal of Hollywood project), <https://planning.lacity.org/dcpapi/meetings/document/72240>; DCP (6/28/22) Central APC Meeting Audio, mm:ss 17:30-21:00, https://planning.lacity.org/plndoc/Audio/Central_LA/2022/06-28-2022/6_ZA_2019_5239.mp3.

⁸ Central APC Meeting Audio, *ibid.*, mm:ss 05:30-07:15.

EXHIBIT A: TRIPALINK/ZIMAS PROPERTY REVIEW

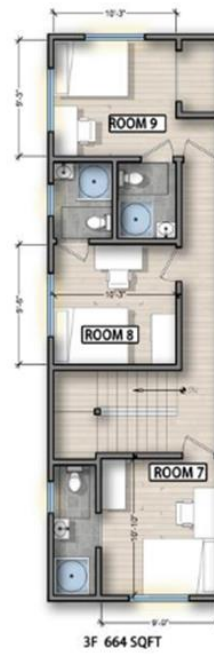
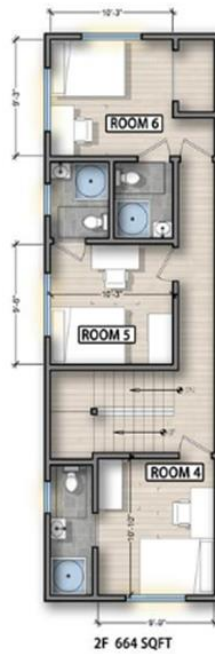
TRIPALINK WEBSITE	ZIMAS	BED	BATH	UNITS	ADDRESS	YEAR BUILT
Tripalink	ZIMAS	9	12	3	1164-76 W 24TH ST.	2017 & 2018
Tripalink	ZIMAS	10	9	3	1224 W 35TH ST.	1906/2019
Tripalink	ZIMAS	10	10	3	1225 W 37TH PL.	1904/2014
Tripalink	ZIMAS	12	12	4	1231 W 36TH PL.	2019
Tripalink	ZIMAS	12	13	4	1369 W. 36TH ST.	2018
Tripalink	ZIMAS	16	16	2	1451 W. 36TH PL.	2018
Tripalink	ZIMAS	12	12	4	1259 W 36TH PL.	2017
Tripalink	ZIMAS	12	12	4	1230 W. 36TH ST.	2012
Tripalink	ZIMAS	6	4	2	1374 W. 35TH PL.	2011
Tripalink	ZIMAS	8	4	2	3009 S. BUDLONG AVE.	2009
Tripalink	ZIMAS	6	6	2	1200 W 24TH ST.	2006
Tripalink	ZIMAS	9	4	2	1384 W 37TH PL.	2004
Tripalink	ZIMAS	17	15	5	1193 W 36TH PL.	2002
Tripalink	ZIMAS	17	9	9	1250 W. 37TH ST.	1964
Tripalink	ZIMAS	10	6	6	1277 W 23RD ST.	1964
Tripalink	ZIMAS	6	6	6	1324 W 36TH ST.	1962
Tripalink	ZIMAS	37	20	19	1296 W. 37TH PL.	1959
Tripalink	ZIMAS	14	13	12	1115 W. 30TH ST.	1957
Tripalink	ZIMAS	16	8	8	1580 W. 30TH ST.	1924
Tripalink	ZIMAS	6	3	3	1354 W. 24TH	1923
Tripalink	ZIMAS	8	4	4	3102 KENWOOD AVE.	1923
Tripalink	ZIMAS	8	8	2	1409 W 25 ST.	1907
Tripalink	ZIMAS	Pending			1430 W. 37TH ST.	
Tripalink	ZIMAS	Pending			1729 W ADAMS BLVD.	
Tripalink	ZIMAS	Pending			1815 W. ADAMS BLVD	
Tripalink	ZIMAS	Pending			2909 ORCHARD AVE.	

EXHIBIT B: TRIPALINK WEBSITE SCREENSHOT

(<https://tripalink.com/apartments/los-angeles/usc-off-campus-student-housing/10000219?date=2022-08-10&cityRoute=los-angeles&areaRoute=usc-off-campus-stu>)



TRIPALINK



1815 W ADAMS BLVD

UNIT A

TRIPALINK



1815 W ADAMS BLVD

UNIT B

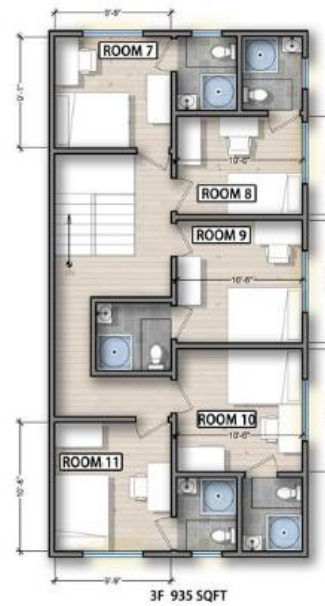
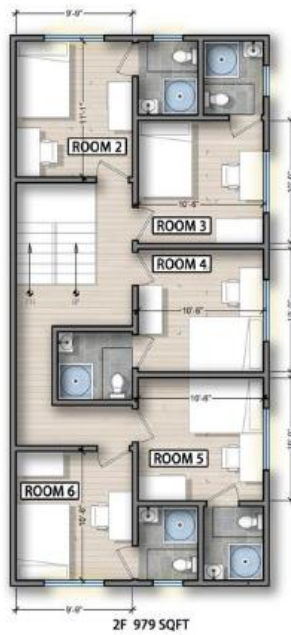
TRIPALINK



1815 W ADAMS BLVD

UNIT C

TRIPALINK



1815 W ADAMS BLVD

UNIT D