



LAND USE, ENVIRONMENTAL & MUNICIPAL LAWYERS

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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

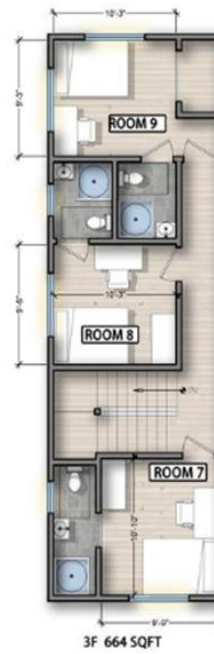
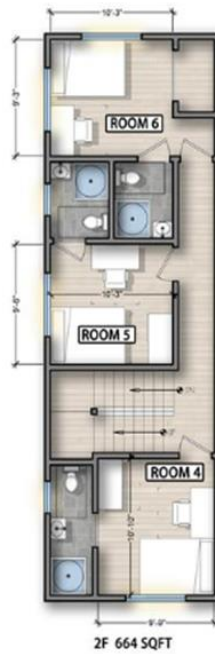
TRIPALINK WEBSITE	ZIMAS	BED	BATH	UNITS	ADDRESS	YEAR BUILT
Tripalink	ZIMAS	9	12	3	1164-76 W 24TH ST.	2017 & 2018
Tripalink	ZIMAS	10	9	3	1224 W 35TH ST.	1906/2019
Tripalink	ZIMAS	10	10	3	1225 W 37TH PL.	1904/2014
Tripalink	ZIMAS	12	12	4	1231 W 36TH PL.	2019
Tripalink	ZIMAS	12	13	4	1369 W. 36TH ST.	2018
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

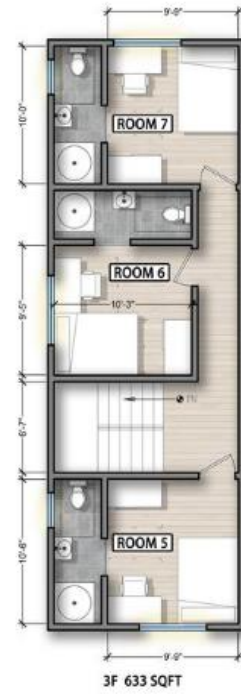
TRIPALINK



1815 W ADAMS BLVD

UNIT B

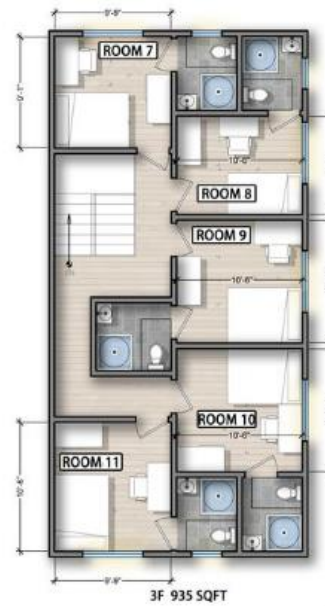
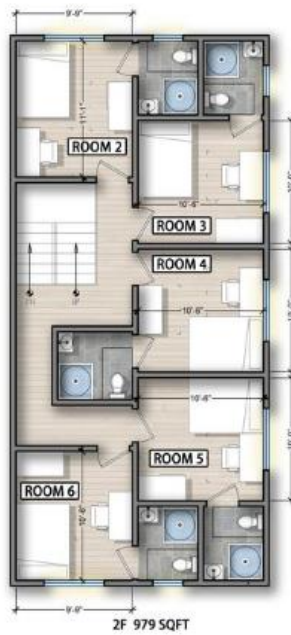
TRIPALINK



1815 W ADAMS BLVD

UNIT C

TRIPALINK



1815 W ADAMS BLVD

UNIT D