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 North Area Neighborhood Development Council  
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RE: City Planning Case CPC-2008-1553-CPU  
 Environmental Case ENV-2008-1780-EIR  
 City Planning Case CPC-2008-1552-CPU  
 Environmental Case ENV-2008-1781-EIR

We would like to thank planning staff and in particular Melissa Alofaituli, for attending NANDC Board and NANDC Committee meetings. Based on the consensus of comments made by NANDC and community members, we submit the following comments with the proviso that we may make additional comments as the South and Southeast Community Plans, and the combined Draft Environmental Impact Report, move through their review process.

One overall comment is that there are many positive concepts embraced in the draft South and Southeast Community Plans, but there are missing details and unsupported conclusions that impact its accuracy. The use of maps combined with change matrixes is cumbersome and challenging. The massive changes proposed are inordinately up zoning; there are some areas that should receive the opposite, downzoning. We expected that there would be a greater balance in up zoning some areas where appropriate and downzoning others to conserve neighborhoods.

Where up zoning has been proposed, it is not always supportable by the infrastructure present or planned. Traffic and infrastructure improvements are not guaranteed nor envisioned in many of the up zoned areas, and neighborhood experience anecdotally would confirm that the degree of up zoning at some sites is excessive. We provide in our letter specific examples that are planned for heights and density that are not supportable by the present infrastructure.

The TOD-oriented (Transit Oriented Districts) allow tall structures which are being placed in extremely traffic congested thoroughfares. They mention additional shuttle/DASH and bus services, but it's not logical to add one more vehicle until they address traffic flow. For example, neighborhood routes cut off by the EXPO line coupled with existing cul de sacs and dead end streets has pushed an inordinate amount traffic onto the main streets because other options have been eliminated because of poor city planning.

We are pleased to note that there are no new oil drilling districts proposed which is a positive.



There is a lack of clarity in the Plan regarding the incentives for desired uses in commercially zoned spaces. The board is generally in favor of the Commercial Use Incentives and Restrictions. The concern is that the CPIO's explanation of incentives and restrictions is unnecessarily complex and presents a barrier to community engagement. The board would like to see the incentive and restriction information integrated clearly and in plain language. There is also a trend to make all corridors transit centers and not enough detailed analysis has been done to evaluate where higher density can be accommodated as opposed to where infrastructure cannot sustain the higher scale of development.

### **The CPIO Program**

The CPIO program to provide guidelines for development is a positive step for neighborhood conservation in both commercial and residential areas. We support the CPIO for the Charles Victor Hall Tract. The details on how the CPIO process will be implemented and enforced are sketchy and how planning will interpret appropriateness and set guidelines is unclear.

One critical flaw in the current CPIO process is that Planning failed to utilize CRA surveys and relied too heavily on Survey LA. In some instances SurveyLA missed wide swaths of neighborhoods. The following areas should be included as CPIOs:

1. The Fraternity Sorority Row District should be included in the designated CPIOs (officially surveyed by CRA)
2. The area between Vermont and Normandie and Jefferson to Exposition needs to be studied for a potential CPIO (needs to be surveyed)
3. The Flower Drive California Register District should be included for CPIO designation (officially on the California Register)
4. There should be a mechanism, given the hasty current review process, to designate CPIOs as an ongoing process given the limitations in the current proposed Plans
5. For purposes of CEQA, CPIO areas need to be treated as a specific plan or historic area

The draft EIR and the Plan relies too heavily on only specific designated resources (HCMs and HPOZs) and SurveyLA. Historic resources should include those resources that are identified in CRA surveys or those over 50 years old and not yet identified. The South Community Plan draft EIR and the draft South Community Plan put forward a narrow view of historic resources relying too heavily on only designated resources HCMs and HPOZs, and those identified by Survey LA. It fails to recognize other designated resources such as those found in CRA surveys and in Bureau of Engineering surveys, to name just a few.



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If one looks at the Conservation Element of the City's General Plan, it describes five types of historic protection designations that apply in the city: (1) Historic-Cultural Monument designation by the city's Cultural Heritage Commission and approved by the City Council; (2) placement on the California Register of Historical Resources or (3) the National Register of Historic Places (1980 National Historic Preservation Act); (4) designation by the Community Redevelopment Agency (CRA) as being of cultural or historical significance within a designated redevelopment area; and (5) classification by the City Council (recommended by the planning commission) as an Historic Preservation Overlay Zone. Designations help protect structures and support rehabilitation fund requests. The California Environmental Quality Act (CEQA) also protects significant cultural and historic resources. CEQA was revised in 1998 to redefine "historic resource" to include resources that are presumed to be significant, unless the preponderance of evidence is to the contrary. A property no longer must be designated officially as a landmark or of historic importance to be considered under CEQA review.

The new South and Southeast Community Plan Draft EIR summary lists neighborhood conservation and historic preservation as secondary goals, which the current plan does not relegate to secondary. This should be a primary goal, not secondary. And the draft plans themselves appear to contradict the draft EIR. Neighborhood conservation and historic preservation should be included among the primary goals.

### **Specific Parcel Recommendations**

We offer NANDC Board comment on the following parcels, in numerical order, based the NANDC policy and Ad Hoc Committees review of the map and change matrix. It is by no means a complete review, given the time that been afforded for comment for both the draft EIR and two draft community plans. It is our expectation that there will be additional suggestions and the comment deadline should be extended beyond February 1.

1460 – The residential zoning along the east and west sides of Union Avenue between 22<sup>nd</sup> Street and Washington Boulevard should be retained, preserving the affordable housing.

1480, 1490 - The southerly portion (the north side of 20<sup>th</sup> Street) should be RD1.5 as it is directly across from the 20<sup>th</sup> Street National Register District;

1500 – While limiting the Mortuary Row area of Washington Boulevard height to three stories is a positive change, the "Row" consists of one and two story buildings and the zone should reflect this. Consider how to further limit height.

1540 – The P-1 and (Q) R 4 parcels should be adjusted to RD1.5, not C2-1- HPOZ

1610 – Should be zoned compatible to adjacent zoning, RD2



1690 – Retain existing height restrictions, implement no more than 3 stories. 6 stories is excessive and not neighborhood compatible for the NE corner of Vermont and Adams; also would exacerbate traffic issues

1800 - Retain existing height restrictions, implement no more than 3 stories. 6 stories is excessive and not neighborhood compatible for the NE corner of Hoover and Adams; parcel is adjacent to numerous designated historic resources; also would exacerbate traffic issues

1810 – Six stories is excessive

1830 – Six stories is excessive; TOD Medium is too dense.

1890, 1895 – change to RD1.5 is appropriate.

1920 – Change to RD1.5 is appropriate

1925, 1926 - The Mt. St. Mary's University (MSMU) parcel should retain the Q conditions (QR-4) which allows for the University use while protecting the historic properties; R-4 is not appropriate and not consistent with the goals achieved in the AB283 process. The community was promised that under the Q conditions, the underlying zoning was R-1. This will protect the historic campus where most of the structures are adaptively reused historic single family homes in the Chester Place National Register District.

2070 – The parcels here should not be rezoned to allow 6 stories which is excessive; the R-3 should be downzoned to RD1.5; a TOD Medium is excessive.

2160 – Residential should not be changed to commercial; should not be rezoned to allow 6 stories which is excessive; the R-3 should be downzoned to RD1.5; a TOD Medium is excessive.

2260 – Residential should not be changed to commercial; should not be rezoned to allow 8 stories which is excessive; a TOD High is overly dense.

2680 – To allow 6 stories on both sides of Western from Exposition to 38 place is excessive; a TOD Medium is too dense.

Parcel, SE Plan, intersection of the 110 and 10 Freeways - Washington Blvd at Figueroa, 110/10 interchange would be TOD regional. The Washington Boulevard parcel allowing 12 stories is not supportable due to traffic and infrastructure considerations.

The parcels within the University Park HPOZ that are RD1.5 should be down zoned to RD2; when the GPA was adopted increasing the Figueroa corridor density, the community was promised some relief in the interior residential neighborhoods.

### **The Draft Community Plan**



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The draft South Community Plan lacks the clarity of the design guidelines in the current plan; lacks specific conservation and preservation language about retaining existing community character. Policy objectives need to be clearer and more specific about protecting neighborhood character. Guidelines should be compulsory.

The Plan should recognize the CRA Area known as Adams Normandie 4321 (expired) as it does Normandie 5 (expired); Include the North University Park Specific Plan in designated historic resources

NANDC is concerned that the Plans should encourage building projects that enhance job opportunities and stimulate the community's economic growth while retaining a livable environment. While the Plans encourage increased housing and enterprise opportunities, discussions need to be had pertaining this massive development effort's planned impact on the stimulation of long term community-based economic growth and equitable housing opportunities. Looking at the Plan and seeing the realities of swift-moving investors, it appears that more money will flow out from our communities than will circulate to stimulate SLA's economic growth for internal wealth building opportunities. This is a historic opportunity to reverse the wealth-drought that has existed among the South LA and Southeast LA residents and businesses for more than 40 years. NANDC recommends the following: that the Planning and the Economic Development dialogues with local stakeholders should happen in tandem to craft a path that brings to fruition the economic prosperity, quality of life, and community resiliency to South and Southeast Los Angeles; create policy and framework to ensure a meaningful percentage of new residential and new or renovated commercial structures are designated for use by qualifying community residents and businesses; implement capacity building processes for South and Southeast Los Angeles community businesses so they are prepared and positioned to submit vendor bid for upcoming construction related work as well as structuring the skills and job training opportunities so that SLA and SELA residents are prepared to fulfill jobs available through the Local Hire Initiatives.

The draft EIR and the South and Southeast Plans assume the demolition of historic buildings. This should be deleted as it skews the environmental review process and does not conform to the established goals of the Community Plans. It has not been in previous community plans; the language that has been included should be deleted or clarified.

The NANDC Board and its committees are available to meet to further explain its comments. Our current recommendations are based on NANDC Board meetings of December 6 (2016) January 5 (2017) and NANDC Committee meetings on November 22, December 1, December 29, (2016) January 5 and January 24 (2017) which included the participation of many stakeholders. Due to the complexity of the materials to be reviewed, we suggest extending the comment period beyond February 1.

Thank you for your consideration of our comment and suggestions.

Adrienne Kuhre, President, on behalf of  
Empowerment Congress North Area Neighborhood Development Council