



April 12, 2017

Mr. Henry Chu
Deputy Advisory Agency / Associate Zoning Administrator
City Hall
200 North Spring Street
LA, CA 90012

Re: VTT-74283-SL; ZA-2016-4597-CU; CEQA No.: ENV-2016-3173-CE
1176-1182 West 37th Place

Via e mail: Courtney.Shum@lacity.org; 213 978-1916
Henry.Chu@lacity.org

Dear Deputy Advisory Agency and Staff Planner Courtney Shum:

Thank you keeping the record open to facilitate the submission of written comment. Please consider the following remarks relevant to the preliminary parcel map to allow a vesting tentative tract under the small lot ordinance for property at 1176 - 1182 37th Place.

On March 2 under the agenda item: *Action/Discussion: 1182 West 37th Place. Small lot Subdivision. Demolition of existing building, subdivision of lot into seven small lot homes, each containing five or more habitable rooms. Preliminary parcel map and conditional use per the West Adams Neighborhood Stabilization ordinance (NSO), the Empowerment Congress North Area Neighborhood Development Council (NANDC) voted to deny the project for the following reasons:*

- o Because of the density and scale, and incompatibility with the community character
- o The block face is two story craftsman homes
- o The area is not properly surveyed and needs to be studied as noted in the NANDC official comment on the draft South Community Plan
- o The development does not support the community character
- o Is out of scale with its surrounding
- o Is too dense and does not enhance the sense of community

In addition, a CE is not an adequate instrument in assessing the environmental impacts of this case. Absent an Initial Study and Checklist there is no fact based analysis of critical Initial Study Checklist categories which deal with Aesthetics, Cultural Resources, Land Use & Planning, Traffic & Circulation, Population & Housing, and Cumulative impacts and Mandatory Findings of Significance.



Cumulative impacts need to be evaluated in the context of the many current small lot proposals this year that we and the developer are aware of:

- 1182 37th Place
- 3431 Catalina
- 1284 1288 37th Street
- 1155 1157 36th Place

And there may be many others for which we have no notifications but are in the pipeline. These addresses above include demolition of what was previously affordable housing, not luxury rental townhomes. **And each of the above are within blocks of each other.** Such a proliferation must surely be considered cumulative. A CE will not be adequate. Findings must be fact based and without an initial study and checklist, you do not have the facts.

This particular small lot subdivision application has ramifications for all of the University District (also known as Expo Park West) as it sets a negative precedent for development the South Los Angeles that is in conflict with its historic pattern of development and which will erode the sense of place and community character. We are seeing a pattern of cumulative impacts that will disrupt and change the entire character of the University District.

Until the latter part of the 19th century, the District was a mixture of marshland, farmland and orchards. The establishment of the university in turn became a catalyst for the development of the neighborhood. West Los Angeles' name was changed to "University" in 1883. The University District has not had adequate attention in the assessment of its historic resources. Today it is comprised of primarily one and two story buildings except for the new four story intrusions.

While the submitted historic assessment contains valuable information, it comes to the wrong conclusion. These buildings are an important asset to the community context and character and set what is part of the historic and defining features of a neighborhood. And they tell a story of the development of early Los Angeles from farmlands to turn of the century urbanization. An MND is required.

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 business people 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.

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.

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.

The block face of 37th Place is comprised of one and two story buildings.

A small lot subdivision is a well-intended 2006 Ordinance meant to utilize undevelopable land and provide opportunities for home ownership. It was meant to allow for creative development on previously fallow and undevelopable lots, not to create artificial small lots on patently developable standard lots. But developers have seized upon it to erode character defining development standards to the detriment of the community. This project involves demolition of a three buildings, two craftsman bungalows and a Victorian era cottage; not the restoration of a bungalow court featured as an example in the small lot ordinance design examples.

This project encourages and provides an economic incentive for the creation of small tracts that never existed in its period of significance and endangers the character defining features of this historic area. Any proposed infill development should consider and conform to the character defining features of the 37th Place block face including massing, scale, materials, and the historic pattern of development.

Such negative factors – overbuilding 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 providing 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. Development patterns are continually being proposed which change the community character and have a chilling effect on the historic neighborhood's ability to demonstrate a sense of place.

The impacts of this project 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 pattern of development, cutting up traditionally sized lots into smaller undersized lots, and over building, creating massive lot coverage and significant parking demands. This pattern has the potential to create severe and irreparable damage to historic buildings and neighborhoods. Cutting up a parcel in its historic configuration is detrimental to the neighborhood character.

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 reasonably well designed addition of infill development, in compliance with the RD1.5 zoning. The Findings that the proposed map is consistent with applicable general and specific plans is not supported by expressed goals of the South Community Plan nor is the design and subdivision consistent with the Plan.

With the demonstrable cumulative impacts and substantial adverse change this Project entails, an MND should be prepared in the context of significant impacts including those on traffic and circulation, aesthetics, population and housing, historic resources. An MND would allow for mitigations and alternatives to be adopted which would reduce impacts of the Project on the surrounding residential area.

As one community member stated about the small lot design at a recent neighborhood council policy committee meeting (where a similarly designed small lot proposal was being discussed):

“The problem I have is that these buildings rarely blend well into existing single-family and multi-family home neighborhoods and I just don’t think it would blend in.” That statement is also true of the current Project.

A CE is not legally insufficient to meet the requirements of CEQA and should not be approved. Should the proponent pursue this subdivision, an MND should be drafted for the project that would allow for mitigations. With both the discretionary actions involved with a parcel map approval and with the discretionary action under the NSO, a CE should not be allowed to stand.

The evaluation of this development in the context of the NSO must include how this is incompatible with the existing community character of one and two story buildings that range from farmhouses to the creation of early Los Angeles in its urbanization. The NSO was adopted to address issues of overcrowding, community character and compatible development. This project does not fulfill the avowed intent of the NSO.

Sincerely.

Jean Frost
NANDC, Area 3 Representative
Chair, Policy Committee
c/o 2341 Scarff Street, LA, CA. 90007
213 747 2526