



NANDC
North Area Neighborhood Development Council



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February 8, 2022

Councilmember Marqueece Harris-Dawson
Councilmember Curren Price Jr.
Councilmember Gil Cedillo

Via e mail

Honorable Councilmembers,

On behalf of our NANDC community, as well as all of our City’s sister neighborhoods, we are seeking your leadership and cooperation in supporting some form of a solution to the sudden losses to our existing neighborhoods’ integrity by a tsunami of inappropriate demolitions. In our City’s rush to find solutions to today’s housing crises they have opened a door to the classic “unintended- consequences” scenarios that allows for ill-regulated new development at the expense of stable and affordable housing.

This new “in-fill replacement” is being built on the bones of family housing and current affordable units. These intrusions tower over their neighbors and ravage the social fabric. They are being built without the needed thorough analysis of what the actual negative impacts are to the specific block and the surrounding neighborhood context.

This current critical escalation of inappropriate demolitions to our City’s finite historic affordable housing units has alarmed the community. Their anxiety and confusion is overwhelming when a non-noticed demolition greets them with bulldozed rubble next door when they come home from work. Their anger slowly turns to dismay when they learn about size and intent of the new replacement neighbor.

The NANDC Board has been working on these issues for the last several years. Thanks to Council leadership a Task-Force was created to provide administrative



methodologies to address our local concerns. At our last Task-Force meeting Planning Department staff reported on the successful adoption of the proposed Plan and announced the implementation time frame would take at least another year to complete.

Although Task-Force members were excited by their success thus far, the prospects for the continuing loss of neighbors and more surprise demolitions without an opportunity for community input was demoralizing. During the ensuing conversation, a specific concept for action evolved and was forwarded to the NANDC Policy Committee for review and action. The Policy Committee, in turn, forwarded their recommendation to the Board. The Board voted to approve the recommendation for action and therefore we submit the following for your consideration:

ACTION:

That NANDC's City Council Representatives co-ordinate their leadership in adopting an administrative decision to modify the current "policy and practices" by the Office of Historic Resources, Building & Safety, and Housing. When there is oversight for compliance with the California Environmental Quality Act (CEQA) to now include additional protections for the demolitions of affordable Housing & Historic units.

The Departments shall provide a revised framework for a more robust review of all new residential development projects that require the demolition of any residential structure built before 1970. The proposed changes will include two new check-off boxes in addition to those of the "Initial Study & Checklist."

One check-off box would be for: "Year of Construction." The other check-off box would be a "yes or "no" for affordable units. This would allow required review of all affected Affordable and Historical units, 50-years or older, to not be categorical exempt due to unique circumstances, and have at a CEQA minimum, a circulated



Negative Declaration for the appropriate CEQA compliance to all demolition requests.

All affected CEQA actions other than Categorical Exceptions: Negative Declaration (ND), Mitigated Negative Declaration (MND), Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) are publicly noticed as announcements in local newspapers. The public issuance notice for CEQA review serves the public as a wake-up call that new development plans have been made and that they include a residential demolition.

The empowerment of the community through a simple public CEQA notice allows for critical public comments. Many of our older housing units include shadow affordable units not necessarily known to the City administrators but known to neighbors.

A current local example 1848 S. Gramercy Place where a proposed demolition of a listed single-family home was in fact a relocation of over twenty long term affordable tenants. All extant affordable units should be replaced, one-to-one, on site, as part of any new development. Much of our community's historic housing stock was underserved by the Survey LA effort and without the opportunity provided by public CEQA notice, unknown important historic resources continue to be lost.

A recent example is 1271 W. 35th Street. The modest and architecturally non-descript California Bungalow slated for redevelopment was discovered at the last minute to be the onetime home of the notable architect Paul Revere Williams. The house has been saved from impending demolition and been declared as a Los Angeles Historic-Cultural Monument. Without the community's intervention it would have been lost forever.

The erosion of a stable community by ill-approved demolition and non-compatible development undermines the existing quality of life for long-term residents. The community must always be kept informed when drastic events such as demolition



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are being planned and approved. The City's forced reliance on Categorical Exemptions to fulfill their CEQA responsibility is little more than a supportive convenience for developers. The community however pays for the price.

Our communities' have suffered from the cumulative effect of decades of demolitions over time and are a matter of record. They now constitute unique circumstances that make a categorical exemption inappropriate.

The Board respectfully requests your assistance in at least leveling the playing field by giving the community an opportunity to speak out to the proposed plans that so greatly impact their lives. Residents should be able to go to sleep without the fear of the next bulldozer on the block. Action is requested by unanimous motion of NANDC at its General Board meeting on February 3, 2022.

Sincerely

Thryeris Mason, President

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