



NANDC
 North Area Neighborhood Development Council
www.NANDC.org



October 22, 2021

Department of City Planning
 200 N. Spring Street
 LA, CA 90012
 Att: Theodore L. Irving, Associate Zoning Administrator
 Helen Jadali, Planning Assistant

Via email (Theodore.Irving@lacity.org, Helen.Jadali@lacity.org)

RE: 3685 S. Vermont, ZA-2020-55-CU-SPR, proposed 168 room hotel with 4300 sq. ft. ground floor retail

Dear Mr. Irving and Ms. Jadali:

The Empowerment Congress North Area Neighborhood Development Council (NANDC) Board discussed additional comments to be submitted regarding the hotel development proposal on October 7, 2021, at its duly noticed General Board Meeting. By motion, the Board voted to submit these additional comments to the ZA on findings required for a conditional use.

The Board approved the following comments:

1. That the project will not enhance the built environment in the surrounding neighborhood nor will it perform a function or provide a service that is essential or beneficial to the community, city, or region.

A Hotel is not an essential service. Housing is. The United Neighbors in Defense Against Displacement (UNIDAD) Coalition called on the City to prioritize public land for public good by committing to use the site of the former Bethune Library, a vacant 34,000 square foot city-owned parcel located at 3685 S. Vermont Avenue, for the development of affordable housing, as residents have continuously called for over the last decade. This publicly owned land has been selected for a hotel development. We need affordable housing, not hotels!

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History

The site of the former Bethune Library has a long-standing history in the community. The former Bethune Library opened in 1975, and named in honor of Mary McLeod Bethune, a prominent entrepreneur, philanthropist, and leader in civil and women's rights. Like its namesake the Bethune Library exemplified the value of equal access to education and equity for black communities. The library offered crucial resources and a vibrant community meeting space to the South Central community until it was demolished in 2009. In the absence of this integral community asset, the City and other local entities have over the years supported an affordable housing project in its place. In 2016, the City sought approval to convert the site into permanent supportive housing. Still, in 2019 City Council voted to prioritize this land for commercial development. The Bethune Library Site was selected for an affordable housing development in the past:

2. The project does not substantially conform with the purpose, intent and provisions of the General Plan, the applicable community plan, and any applicable specific plan.

The applicable plan overlay is its location within the Hoover Expo University Park Redevelopment Plan area whose expressed goals are:

Goal 2: To make provisions for housing as is required to satisfy the needs and desires of the various age, income, and ethnic groups of the community, maximizing the opportunity for individual choice.

Goal 3: To alleviate overcrowded, substandard housing conditions and to promote the development of a sufficient number of affordable housing units for low and moderate-income households.

Goal 4: To make provisions, throughout the Project Area, for well-planned community uses, facilities, pedestrian and vehicular circulation, and adequate parking, particularly as these relate to Exposition Park.

Goal 5: To implement the City's policy to establish "opportunity areas" to specifically encourage private investment, consistent with the plan's objectives in housing, commerce, and industry.



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Goal 6: To encourage a thriving commercial environment which will contribute to neighborhood improvement.

This project does not meet these goals nor the decades under redevelopment where the community was made promises about this site when CRA acquired the site, and the Bethune Library was demolished.

Hotels do not historically contribute to neighborhood improvement and create a thriving environment except within its own confines. Another project which had been in the works and nearing approval was a mixed use and economic incubator project. This had a relationship to community improvement which hotels do not.

3. The project's location, size, height, operations, and other significant features will not be compatible with and will adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.

The entire area west of the site is zoned RD1.5. Hotels do not enhance the livability of residential neighborhoods but rather create an intrusion. The site itself is within PIO whose goals are to encourage new, compatible uses to support vibrant commercial corridors. It's adjacency to RD1.5 land does not support a hotel development. The purpose of the South Los Angeles CPIO District is "to implement the goals and policies of the South Los Angeles Community Plan by tailoring development in order to promote better urban design and enhance the aesthetic character of the community; to ensure appropriate scale, intensity, and transition; and to encourage a diversified range of quality retail and services that meets the needs of the community."

4. That any residential project provides recreational and service amenities to improve habitability for its residents and minimize impacts on neighboring properties.

The applicant explained: "The project does not propose residential development, and this finding is not applicable. Regardless, the proposed hotel includes two outdoor terraces and a fitness center for use by hotel guests that will improve the hotel experience and minimize impacts on neighboring properties."

A hotel by its nature offers security enhanced housing and amenities for travelers. It does not offer community amenities and the record of this site shows that an alternative other than a hotel will better serve the area residents.



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5. The hotel project will not build community, create a commercial opportunity nor enhance the surrounding residential area. Stakeholders questioned the assessment of impacts, the actual economic benefits, the nonunion status of the hotel and the failure of a hotel project to build community. The issues of safety and neighborhood security according to residents will be impacted in a negative and ancillary activities adjacent to the hotel may create a dangerous environment to families and children.

6. This should not be CEQA exempt.

Thank you for keeping the file and comment period open for an additional month.

NANDC is a self-governed, self-directed and independent organization empowered by the Los Angeles City Charter. This charter offers neighborhood councils a role in the City's decision-making process. NANDC was certified by the City of Los Angeles on April 27, 2002, and was the 24th neighborhood council formed under the guidelines of the City Charter.

Sincerely,

Ms. Thryeris Mason, President

cc: Councilmember Marqueece Harris-Dawson.
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