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- **“Initial Submissions”**: Compliant submissions received no later than by end of day Monday of the week prior to the meeting, which are not integrated by reference or exhibit in the Staff Report, will be appended at the end of the Staff Report. The Staff Report is linked to the case number on the specific meeting agenda.
- **“Secondary Submissions”**: Submissions received after the Initial Submission deadline up to 48-hours prior to the Commission meeting are contained in this file and bookmarked by the case number.
- **“Day of Hearing Submissions”**: Submissions after the Secondary Submission deadline up to and including the day of the Commission meeting will be uploaded to this file within two business days after the Commission meeting.

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If you have any questions, please contact the Commission Office at (213) 978-1300.

DAY OF HEARING SUBMISSIONS



Planning APC South LA <apcsouthla@lacity.org>

(no subject)

1 message

catherine m estrada <simpaticostudiola@gmail.com>
To: apcsouthla@lacity.org

Tue, Jun 15, 2021 at 10:50 AM

Dear S.A.P.C,

Writing to you regarding the project under review at 806 W Adams Boulevard /DIR-2020-43388-RDP-1A, ENV-2018-24554-CE.806.

As a member of the community I appreciate the councils' thoughtful consideration regarding this matter. I want the council to consider that although there is an opportunity for more housing in this project, it is not the type of housing that would be appropriate or appreciated in my community.

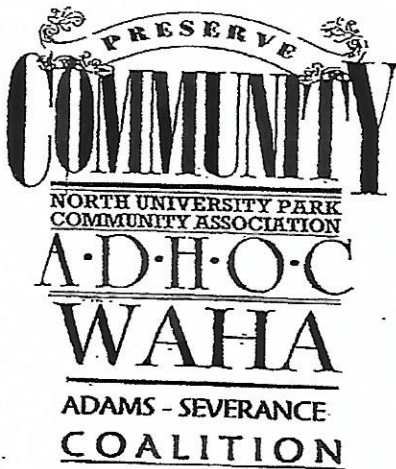
We need more affordable housing for families and working class individuals, not more student housing.

This project is far too big for our community. Please consider the needs and desires of the community. The outpouring against this project, as it is, should be the deciding factor. We aren't against development. We are in favor of more housing that will meet the needs of the community.

This project is excessive development and is not compatible with the historic character of our community. Neither will it contribute to a desirable residential environment.

Please listen to the voice of the community and do not approve this project.

Sincerely,
Cathy Estrada



Case No.
DIR-2020-4338-RDP-1A
CEQA No.
ENV-2018-2454-CE

Project Site:
806 W. Adams Blvd.

PUBLIC HEARING:
Tuesday, April 06, 2021
South Area Planning
Commission (S.A.P.C.)
Telephonically by Zoom

Planning Staff,
Rafael Fontes / 231-978-1189
Email: Rafael.fontes@lacity.org

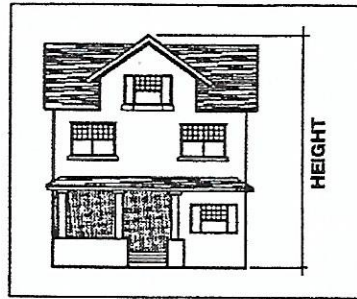
Project Description:
185,985 square feet
102 five-bedroom apartments
7 four-story buildings
259 vehicle parking spaces

Applicant;
Bob Champion

APPELLANT:
Jean Frost / W.A.H.A.

1.1.2 HEIGHT

The height of a building or structure shall be defined by the Los Angeles Planning and Zoning Code, height of Building or Structure.



Height shall be measured from grade to the highest point on the main roof. The prevailing height is the most commonly occurring height on a block face on which a project is proposed.

A new project shall not dominate existing buildings and structures.

In general the new project shall look as though it belonged to an

area. Height is generally used to create accent and make an object "stand out". Because the existing conditions tend toward low profile buildings, new projects shall be appropriate to this character and look of the area.

Standard

The maximum height allowed is to be equal to or less than that permitted by the existing zoning. Height shall be measured to the highest point on the primary roof.

Application

If the prevailing height is less than prescribed by code then a new project shall adopt a height similar to the prevailing.

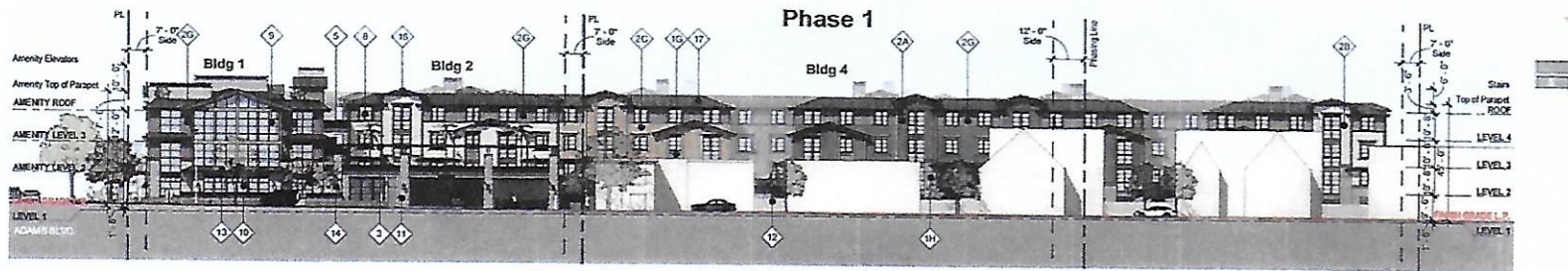
L.A. COMMUNITY REDEVELOPMENT AGENCY URBAN DESIGN PROGRAM

Honorable members of the South Area Planning commission,
I am a historic preservation consultant. I have served as an elected official on the CRA/LA Project Area Committee and by appointment of the LA Cultural Heritage Association to the University Park Historic Preservation Overlay Zone Board.

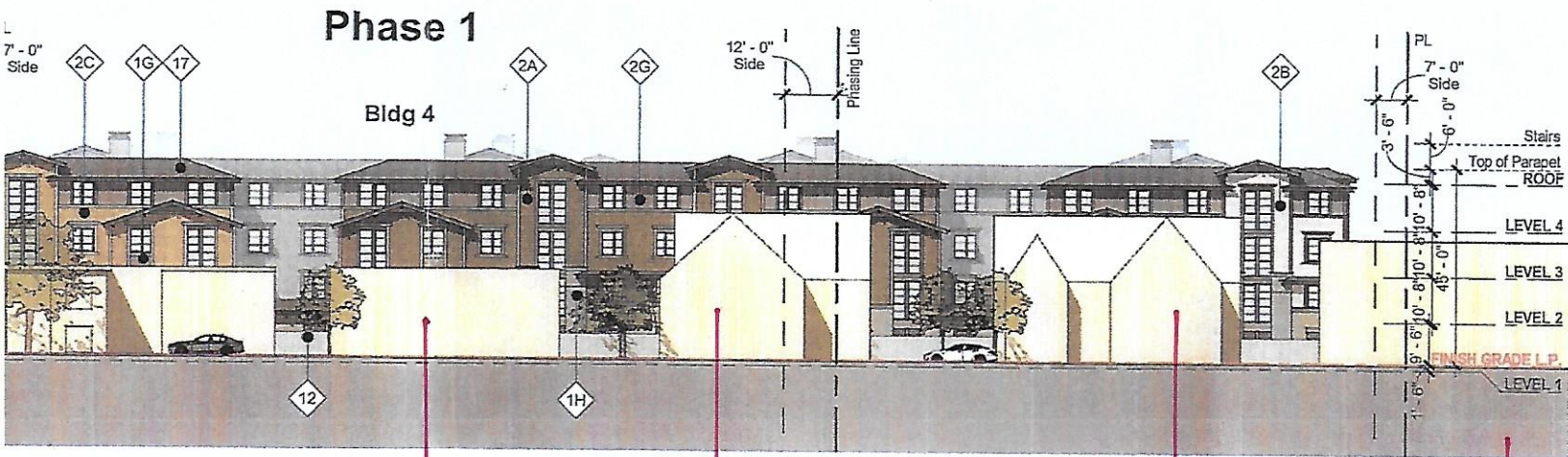
In all three positions I have had responsibility to render opinions regarding issues of compliance with the Secretary of the Interior's Standards and Guidelines. A primary concept and a fundamental application is that "**A new project SHALL NOT dominate existing buildings and Structures.**" Domination occurs when a building is taller than another building.

The following illustrations of the developer's Severance Street Elevation clearly shows the massive 4½-story student dormitory Project towering over the historic 2-story homes. The Project dominates the historic setting and context, as such it is therefore NOT in compliance with the Standards and therefore cannot be CEQA Exempt.

What ever else you may decide you must reject the City's proposed Environmental document and require a new CEQA review with either an MND or and EIR. There are impacts,
Jim Childs, Chair ADHOC. 213/748-1656 / jeanjim2341@att.net



West Elevation (Severance St.)



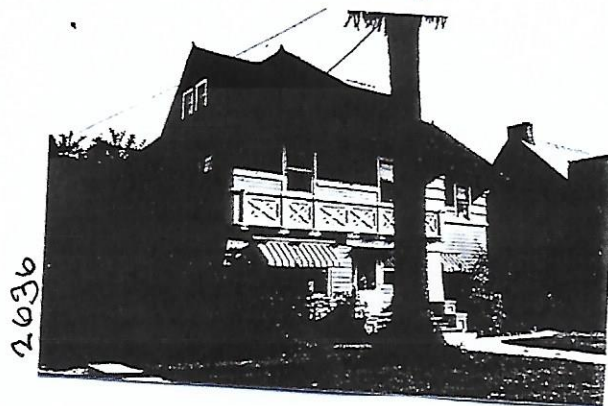
East Elevation (Severance St.)



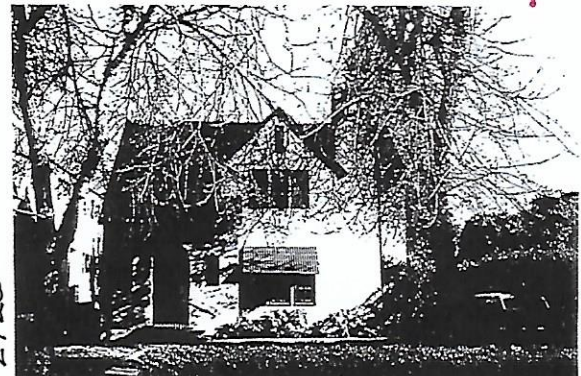
View of the Severance Street Apartments at 2630 Severance St. (Map Reference #11), facing east.



View of the Waters-Shaw Family Residence (Map Reference #10), facing southeast.



2636



2720



Planning APC South LA <apcsouthla@lacity.org>

Fwd: 806 W Adams, Champion Project, SAPC Hearing

2 messages

katie rainey <kraineydvm@gmail.com>

Tue, Apr 20, 2021 at 12:35 PM

To: apcsouthla@lacity.org

Cc: aurorabupac@gmail.com

Hello

This is Dr. Katie Rainey, a long time resident of the University Park Community. I am writing this email, because my work schedule may make it not possible to attend the phone or live Zoom meeting today. But I want to make sure my voice is heard in regards to this matter.

The construction and existence of a 100 unit or 50 unit living residence in the Adams Blvd corridor would be an environmental and socioeconomic disaster.

The constructions of such a large project would send so much dust and debris into the lungs of the young and elderly residents of this community of single family homes.

Adams Blvd between Vermont Ave to the west, and Figueroa to the East moves at a snails pace on many days. Now add to that delimma a major construction project is not well thought through.

The State of California has a staggering homeless crisis. Cities such as San Francisco and Los Angeles are leading on all aspects of this socioeconomic disaster.

The mayor just announced a billion dollar plan for alleviating this disaster. And through all of this Someone wants to plot a major residential project for the cities elite, when this same area no to long ago was the very site for a homeless encampment. The homeless encampments between King Blvd to the South, the 10 Freeway to the North, Western Avenue to the West, and the 110 Freeway to the East is vast. Too vast for a 100 unit housing project for such a "let em eat cake"

use of land. Not to mention the exposure to heavy dust for the kids to breathe at a number of close proximity secondary schools (Hoover St, Adams Preparoty, Saint Agnes, Baxter Middle, Vermont Ave School, etc). This is an unconscionable project for all the wrong reasons.

The people who are in charge of the decision making the nay or yea say for the construction of this project have the choice to make and do the right thing for a lifetime or our City's most vulnerable, during a time when many have forgotten what it means to care for those who can't speak or care for themselves.

The crisis in this City and state is because of the divide between those that have and those who have not is too wide or gone all together. So, I ask those who are in power for this decision --- take a step for what really helps bring this community together. Allowing this project is not for the good of the University Park Community or the City of Los Angeles.

Katie Rainey, DVM
(310) 343-3915
25th Street
kraineydvm@gmail.com

katie rainey <kraineydvm@gmail.com>

Tue, Jun 15, 2021 at 11:11 AM

To: apcsouthla@lacity.org

Cc: Aurora Becerra <aurorabupac@gmail.com>, University Park Action Coalition <losangeles.upac@gmail.com>

Hello All

I made my point on this subject before in this email. There is no enviromental health and socioeconomic benifit of this project. And to even concider such a project in the middle of a State let alone a large metropolitan area plague with one of the greatest homeless crisis is unconciable.

Sp, my original email on this matter stands as is.

Thank You

Dr.Katie Rainey
Former LA City Chief Veterinarian
Former LA County Public Health Veterinaian.
Current USDA Accreditate Veterinarian.
(310) 343-3915
kraineydvm@gmail.com
[Quoted text hidden]



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Andrew Brady
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T 213.694.3108
F 310.595.3406

June 11, 2021
VIA EMAIL

Etta Armstrong
Commission Executive Assistant
South Los Angeles Area Planning Commission
200 North Spring Street, Room 272
Los Angeles, CA 90012
Email: apcsouthla@lacity.org

Re: Case Number: DIR-2020-4338-RDP; 806 West Adams Boulevard (758 – 832 West Adams Boulevard; 2610 South Severance Street

Honorable Commissioners of the South Los Angeles Area Planning Commission:

This letter supplements our May 3, 2021 letter regarding the proposed 102-unit residential development project (“Project”) located at 806 W. Adams Boulevard, Los Angeles, California (“City”). The Project is currently before the Commission on an appeal (“Appeal”) challenging a Redevelopment Plan Project Compliance Review approval issued by the Director of Planning on January 28, 2021 (“Approval”).

The Project application was originally submitted in 2018. It received final entitlement approvals on appeal from the City Planning Commission (“CPC”) in October 2019 and approval of a Class 32 CEQA exemption on appeal from the City Council in February 2020. Following its final approval, the Planning Department determined the Project was required to apply for one additional entitlement, a Redevelopment Plan Project Compliance approval, which was required by an ordinance adopted by the City in November 2019 – after the final CPC hearing on the Project’s entitlements. That Redevelopment Plan Project Compliance approval is the only approval at issue in the present Appeal, though the issues raised by the Appellants here are issues they have previously and repeatedly raised to the City, which *have previously been rejected repeatedly*. Further, same appellants filed suit against the City on the same issues and the City is currently defending that lawsuit in court.

As explained in further detail in our May 3, 2021 letter, the South Los Angeles Area Planning Commission (“Commission”) lacks jurisdiction to hold any further hearings on the Project because:

- 1) The City has already held six hearings on the Project, which is already more than the maximum number allowed for the Project by state law SB 330.¹ The failure to render a final decision on the Appeal within the five allowed hearings results in an automatic denial of the appeal and loss of jurisdiction by the Commission. We have submitted a more detailed letter into the file dated June 10, 2021 that further explains why this SB 330 applies here, eliminates the Commission’s jurisdiction and why the counterarguments presented by the City are not correct;
- 2) The Commission is past its 75-day deadline to render a decision on the Appeal under Los Angeles Municipal Code (“LAMC”) Section 11.5.14-D.5(g)(3), which deadline is not extended by the Mayor’s March 21, 2020 tolling order due to the applicability of state law SB 330 (the tolling

¹ SB 330 is the “Housing Crisis of 2019.”



June 11, 2021

Page Two

order does not apply where a contrary state law applies). For this additional reason, the Commission lacks jurisdiction to hold the June 15, 2021 hearing.

On this basis, we therefore formally object to the proposed June 15, 2021 continued Commission hearing on the Appeal and request the Commission make a finding that it lacks jurisdiction to hold the continued hearing.

Further, if the Commission moves forward with the hearing notwithstanding SB 330, the Commission cannot uphold the Appeal because:

- 1) The SB 330 findings required for denial of a housing project cannot not be made in light of contrary findings already made by the CPC and City Council as fully discussed in the June 10, 2021 letters to the Commissioners regarding the previous entitlements approved for the Project;
- 2) The only approval at issue here is a Redevelopment Plan Project Compliance approval. The applicable Redevelopment Plan does not implement an affordable housing requirement on individual projects and the Project provides affordable housing that *exceeds* applicable state Density Bonus law requirements, as set forth in our May 3, 2021 letter to the Commission;
- 3) The exact same Class 32 CEQA exemption for the Project was already approved by the City Council on an appeal brought by the same appellants with the same arguments here regarding the prior entitlements the City approved for the Project, and nothing has changed since that approval. The City is currently defending a lawsuit on this Project on the same issues by the same appellants and a contrary ruling here would conflict with the City's prior, well-reasoned decisions the City is defending in court; and
- 4) The Director's Determination approving the Redevelopment Plan Project Compliance Review for the Project is well supported by substantial evidence in the record. The Appeal relies exclusively on unsubstantiated opinions and misstatements of both fact and law, which do not constitute substantial evidence and do not support overturning the Director's Determination as fully discussed on our April 1, 2021 letter to the Commission.

Thank you.

Best regards,

A handwritten signature in blue ink, appearing to be 'AB', with a long, sweeping horizontal stroke extending to the right.

Andrew Brady

AB:

From: Jim Robinson <Jim@RobinsonResidences.com>
Sent: Monday, May 10, 2021 5:12 PM
To: apcsouthla@lacity.org
Subject: DIR-2020-4338-RDP-1A

To: South Los Angeles Area Planning Commission

Re: DIR-2020-4338-RDP-1A
CEQA: ENV-2018-2454-CE

Honorable Commissioners:

It's very encouraging that two commissioners have already chosen to support this appeal. Now the commission has an opportunity to make it unanimous.

Please keep this in mind: The appeal and its supporters in the community are not asking you to decide, one way or the other, on the merits of the project. We're simply asking you to recognize that residents have genuine concerns that deserve a hearing. A categorical exemption denies that hearing.

Some people are concerned about the project's effect on a historic neighborhood. Some are concerned about neighborhood parking. Some fear the noise from roof-deck partying, whose solution, says the applicant, is for neighbors to call the police.

We think the police are busy already, and a better solution to these adverse impacts is to consider a design that mitigates them. Whether or not you share our concerns, you'll surely agree there is reasonable doubt.

And if that doubt exists, a CEQA exemption is clearly inappropriate.

Sincerely

Jim Robinson
27 St. James Park
Los Angeles, CA 90007
(213) 663-3022

· N · U · P · C · A ·

NORTH UNIVERSITY PARK COMMUNITY ASSOCIATION

June 15, 2021

TO: South Area Planning Commission
200 North Spring Street, Room 272
Los Angeles, CA 90012
via email: apcsouthla@lacity.org

RE: DIR-2020-4335-RDP, 806 West Adams Boulevard (758-832 West Adams Blvd.), Los Angeles CA 90007

Honorable Commissioners;

NUPCA, the North University Park Community Association, continues to support the appeal before you by West Adams Heritage Association (WAHA).

The only reason I am writing this letter/memorandum – since none of the facts have changed – is to express my utter SURPRISE and DISMAY at the newest letter/tactic submitted (on June 11, 2021) by the Applicant through its representatives, DLA Piper/Andrew Brady.

Mr. Brady wrote you to complain that there have been “too many” hearings in this matter. Yet on April 1, 2021, Applicant’s representatives specifically admitted that there had never been a public hearing on the matter before us in this Appeal, namely the requested variation from the Exposition/University Park Redevelopment Plan. The April 1 letter was lengthy, but essentially Mr. Brady argued, on page 1, that **“No Public Hearing Was Required Prior to the Issuance of the Director’s Determination.”**

And **no public hearing was held**. This appeal, in part, was to request that the Director hold what Appellant (and also other community stakeholders, including NUPCA) believe is a required hearing that allows members of the community to record their concerns and opinions before the Director issues not just a Determination but also Findings to support the letter of the Redevelopment Plan (e.g., “law”).

So it is ironic at best, but seemingly more calculated and strategic, for Applicant to now claim the number of public hearings has exceeded the law.

The primary reason that we are here at all is that Applicant refused to file redevelopment compliance case in a timely manner. This appears to be rather purposeful, a way of avoiding going before the Successor Agency to the Community Redevelopment Agency, and simply waiting until jurisdiction transferred to the Los Angeles Department of City Planning, where it seems Applicant knew it would be an easier path.

It was a long wait.

This Commission may recall that on August 6, 2019, where the underlying case (ZA-2018-2453-CU-DB-SPR-1A) was initially scheduled for a hearing, I testified at some length about the requirements of the Redevelopment Plan and questioned WHY Planning staff was not requiring Applicant at that time to apply for and receive the required Redevelopment clearances before proceeding with the case. The matter was sent to the City Planning Commission (because it was a density bonus case) and the South Los Angeles Area Planning Commission did not take an action. But I want to put that date forward again: **August 6, 2019.**

Applicant did not submit anything to the Successor Agency. At the time the underlying matter finally went to City Council, staff scrambled literally on the morning of the hearing to amend the agenda (without even 24 hour notice required for “emergencies” under the Brown Act, another state law) to require that Applicant does get the clearance related to the Redevelopment Plan.

This was before COVID. So at that point, Applicant had been on public notice for at least six months that there was a still-extant Redevelopment Plan, and that a “variation” (variance) from the Plan was required, with Findings. Nonetheless, Applicant waited FIVE MORE MONTHS to comply with City Council’s action and submit that application, which is the NEW CASE we are dealing with today.

There have NOT been more than five hearings on this matter. This does not violate SB330. My perception – perhaps this is the public’s perception – is that Applicant’s representatives purposely and knowingly delayed their application for the Redevelopment case to 1). Avoid presenting to the Successor Agency, which does understand the Redevelopment Plan; and 2). To avoid a public hearing.

NUPCA was founded four decades ago with the specific mission and purposes of building community and protecting both historic resources and the character of the community in the University Park/North University Park neighborhoods. Along with efforts to establish the University Park HPOZ, NUPCA successfully advocated for the establishment of the North University Park Specific Plan and DRB, and also for the creation of the two designated National Register Historic Districts (the Menlo Avenue West 29th Street District and the North University Park District). NUPCA served on the Community Redevelopment Agency’s “Hoover” (later Exposition/University Park) Project Area Advisory Committee from approximately 1983 until the Agency’s demise. Thus, as a longtime community stakeholder and advocacy organization, NUPCA is a stakeholder in this matter.

Thank you for your consideration.

Laura Meyers
On behalf of NUPCA
HOME: 1818 S. Gramercy Place, Los Angeles CA 90019
NUPCA: P.O. Box 15881, Los Angeles CA 90015*

** Please send any notices to both addresses.*

TO: South Area Planning Commission
 FROM: Jean Frost, West Adams Heritage Association (WAHA), Appellant
 2020-4338-RDP-1A, CE 2018-2454-CE, related case ZA 2018-2453-CU-DB-SPR-1A

Honorable Commissioners.

First, I want to thank you for the time and attention this appeal has generated to date. Once again we ask for your sustaining of the appeal. In my appellant rebuttal on April 6, I said, in all of the appeals in all of the cases you hear, this one is particularly worthy of your sustaining. The record so demonstrates.

The record generated at the two prior commission meetings I understand will be carried over to the June 15 hearing. Based on the extensive record, we ask that the commissioners support the appeal. And by reference we add ZA- ZA 2018-2453-CU-DB-SPR-1A which the case file here ignores. And Superior Court Case 20STCP00916 which is in process. The fact that it has taken us to a 2-2 split on the Commission's voting shows that there is **substantial** evidence in the record and that we have provided a reasonable argument that this is an exception to the CEQA exemptions. How can I convince you of that? The record. Look at the record.

First, the record shows that substantive arguments have been made by WAHA, the Adams Severance Coalition and numerous other commenters: NANDC (neighborhood council), USC, WARD Economic Development, ACCE, NUPCA, City Living Realty, MSMU, UPAC, SEIU Local 721, the University Park HPOZ, and scores of individual stakeholders that have given factual, eyewitness testimony. And yet the City continues to bury its head in the sand in a post hoc rationalization effort to approve what flies in the face of the facts.

From the beginning of the approval process, we and others have argued and the City so stated that the Redevelopment Plan is an overlay that takes precedence over other City rules (as the Ordinance wherein the City is responsible for CRA compliance clearly states.). Staff and applicant spent several years totally **ignoring the redevelopment plan requirements**. They cannot meet its requirements both in density bonus requirements and housing objectives. They refused to go through the redevelopment process requesting conformance and a variance to the Plan during the project approval process. At the very last minute, at City Council on the morning of the City's project hearing, an "emergency" added note was placed on the agenda **requiring the CRA/redevelopment plan review as a condition of the approval**. That approval is now before you. They applied for CRA approval **after project approval** and the City held no public hearings. Rather, it issued a Letter Determination on 1/28/2021 which we are appealing. The requirements of the Redevelopment are greater than and exceed the city's and take precedence.

We ask that you find that this project IS an exception to the exemptions. There is significant effect due to unusual circumstances. **A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.** There ARE unusual circumstances. Adams Boulevard is a City scenic highway and yet the Adams Boulevard frontage is being treated as a side yard. There are impacts to the surrounding properties and streetscapes and elevations clearly show this.

This appears to be a post hoc rationalization to cure a defect when City Council already affirmed ENV-2018-2454-CE. Now in a separate segmented action (2020-4338-RDP-1A, CE 2018-2454-CE), you are being asked to make findings for the density bonus under the redevelopment plan, determine that this project complies with the redevelopment plan objectives, **which it clearly does not**, and agree that this project qualifies for a categorical exemption **which it clearly does not**. The evidence IS there, and the record so shows.

There are impacts to the surrounding properties and streetscapes and elevations clearly show this. Yet and in its staff report continually opines "there is no substantive evidence." This is blatantly not true. See this elevation? The Severance properties (1 and 2 story) are in beige with the project hovering behind.



Does Not Meet the Redevelopment Plan Objectives

This proposed project fails to meet other stated objectives of the Redevelopment Plan:

"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.

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.

To promote compatible development, with consideration to scale, height, material, architectural quality, and site orientation”
This project does not provide for housing to “satisfy the needs and desires of the various age, income, and ethnic groups of the community.”

It is an off-campus student housing project as their own study states, which will generate 1,559 daily trips.¹ All affecting Severance Street. Their own economic study also used a measure of 800 students in the bedrooms on Severance. Expert testimony by experienced realtors and land use experts show that this **is** a student housing model. It is an off-campus student housing project not aimed to “**satisfy the needs and desires of the various age, income, and ethnic groups of the community**” as the Redevelopment Plan requires.

THE CE cannot be justified.

The City fails to recognize the facts and asserts *there is no substantial evidence demonstrating that an exception to a categorical exemption applies pursuant to CEQA Guidelines, Section 15300.2 applies.*

Decision and Appeal

On January 28, 2021, the Director of Planning issued a Determination that approved ENV-2018-2454-CE.

*“The City has based its approval of this Project upon a Class 32 categorical exemption to environmental review under CEQA. This categorical exemption is inapplicable because the Project is inconsistent with City plan and zoning policies, goals, and regulations, would result in traffic impacts due to a severe parking shortage and would have adverse noise impacts on the surrounding residential community due to rooftop open space. The use of a categorical exemption is also unavailable because the Project may have aesthetic and cultural resource impacts on the historic West Adams neighborhood, at a Project and cumulative level, and due to the need for conditions of approval to mitigate potential impacts. Further, the Project is inconsistent with the Hoover-Exposition/University Park Redevelopment Plan requirements for density, compatibility, and adequate amounts of affordable housing.”*²

15300.2 Classes 3, 4, 5, 6, and 11 are qualified by consideration of **where the project is to be located** – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant.³

The errors proliferate as the report continually asserts there is no substantive evidence in the record. This is simply not true based on the whole of the record. There IS substantial evidence. In the whole of the record which includes related case ZA 2018-2453-CU-DB-SPR-1A as well as DIR 2020-4338-RDP-1A, and the shared CE 2018-2454-CE.

Unique circumstances

2.16 Scenic Highways: Ensure that future modifications to any scenic highway do not impact the unique identity or characteristic of that scenic highway. Scenic Highways include many of the City’s iconic streets. Preservation and enhancement of these streets and their scenic resources need to be preserved per the Scenic Highways Guidelines in Appendix B of this Plan.⁴ We are aware that the CEQA Guidelines are specific as to state scenic highways, but city scenic designation has an actual impact that needs to be considered and this project TREATS Adams Boulevard as a SIDE YARD.

Compatibility

At our April 6 meeting, Commissioner Orozco considered this project as compatible based on Adams and Figueroa as a benchmark. But the zoning there is C-2, NOT RD1.5 and if this project were an Adams and Figueroa, we would be having a different discussion. If you look at page 5 of the staff presentation you will see a stretch of Adams Boulevard in pink (C2) and then Adams Boulevard breaks into RD1.5. That is where our project is sited. The RD1.5 applies to all of the parcels except for this one pink stretch of C2. The applicant’s examples of compatible construction cherry picks three of the tallest buildings, 2 of which are in the C2 zoning. Attached is the Severance streetscape which shows the one- and two-story scale of most of the properties surrounding this site.

The Density Bonus Findings Cannot Be Made

The record shows that what the built form encourages here is a student housing facility that will be incompatible with its surroundings and disrupt the quality of life for the residents and stakeholders. The project will not **“contribute to the revitalization goals of the plan. The project will not contribute to a desirable residential environment, neighborhood stability, and will adversely impact the neighboring environment. The project will not provide units with adequate living area and avoid excessively dense development. The project will not provide adequate parking.”**

In closing, “The project’s scale and massing, in addition to the podium level add to a development that would not be comparable to any residential project in the immediate area. In addition to the height and massing, though not deviating from the Code, the rooftop amenity would overwhelm those multi-family structures immediately abutting the subject project on Severance Street.”⁵

For all these reasons, and based on the record, the appeal should be sustained.

¹ Transportation Impact Study for the 806 W Adams Residential Project

² Amy Minter, Chattem-Brown, Carstens & Minter

³ 2019 California Environmental Quality Act (CEQA) Statute and Guidelines

⁴ Mobility Plan 2035, An Element of the General Plan, adopted by City Council 9/7/2016

⁵ ZA Henry Chu, ZA Determination Letter, May 17, 2019