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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.
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SECONDARY SUBMISSIONS



Department of City Planning

City Hall, 200 N. Spring Street, Room 525, Los Angeles, CA 90012

April 17, 2023

TO: City Planning Commission

FROM: Matthew Glesne, Senior City Planner

TECHNICAL CORRECTIONS TO THE STAFF RECOMMENDATION REPORT AND EXHIBIT A FOR ITEM NO. 6 – ADVISORY NOTICE RELATIVE TO THE USE OF THE TERM WORKFORCE HOUSING

The following minor technical corrections are to be incorporated into the staff report and Exhibit A to be considered at the City Planning Commission meeting of April 20, 2023 related to Item No. 6 on the meeting agenda.

INSTRUCTIONS:

Amend the Exhibit A reference in the Table of Contents of the Staff Recommendation Report as follows:

~~A – Advisory Notice Relative to Above-Grade Parking~~ Advisory Notice Relative to the Use of the Term Workforce Housing

Amend the conclusion on pg. A-2 of the Staff Recommendation Report as follows:

The proposed Advisory Notice ~~Regarding~~ Relative to the Use of the Term Workforce Housing is attached as Exhibit A.

Amend the title of Exhibit A as follows:

EXHIBIT A
ADVISORY NOTICE ~~REGARDING~~ RELATIVE TO THE USE OF THE TERM
WORKFORCE HOUSING

Amend the effective date on page 1 of Exhibit A reference as follows:

EFFECTIVE DATE: ~~FEBRUARY 23, 2023~~ APRIL 20, 2023



DEPARTMENT OF CITY PLANNING RECOMMENDATION REPORT

City Planning Commission

Date: April 20, 2023*
Time: After 8:30
Place: In conformity with Government Code Section 54953 and due to concerns over COVID-19, the CPC meeting will be conducted entirely telephonically by Zoom [<https://zoom.us/>].

The meeting's telephone number and access code access number will be provided no later than 72 hours before the meeting on the meeting agenda published at:
<https://planning.lacity.org/about/commissions-boards-hearings> and/or by contacting cpc@lacity.org

Public Hearing: Not Required
Appeal Status: Not Appealable
Expiration Date: N/A

PROJECT LOCATION: Citywide

PROPOSED PROJECT: Advisory Notice to Applicants Relative to the Use of the Term Workforce Housing

REQUESTED ACTION: Endorse Advisory Notice to Applicants Relative to the Use of the Term Workforce Housing, Attached as Exhibit A.

RECOMMENDED ACTIONS:

ENDORSE the Advisory Notice to Applicants Relative to the Use of the Term Workforce Housing, Attached as Exhibit A.

VINCENT P. BERTONI, AICP
Director of Planning

Nicholas P. Maricich, Principal City Planner

Matt Glesne, Senior City Planner
(213) 978-2666

Workforce Housing Advisory Notice
April 2023

ADVICE TO PUBLIC: *The exact time this report will be considered during the meeting is uncertain since there may be several other items on the agenda. Requirements for submission of materials can be found on the Department of City Planning website at <https://planning.lacity.org/about/virtualcommission-instructions>. If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendaized herein, or in written correspondence on these matters delivered to this agency at or prior to the public hearing. As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability, and upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request no later than three working days (72 hours) prior to the meeting by calling the Commission Secretariat at (213) 978-1299.

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A – Advisory Notice Relative to the Use of the Term Workforce Housing

PROJECT ANALYSIS

SUMMARY

The City Planning Commission directed the Department to draft an Advisory Notice to address their concerns regarding the use of the terms “workforce housing” and “workforce income.” The Advisory Notice is attached as Exhibit A. It includes the background and rationale for this action, which is primarily intended to advance the equity agenda of the Commission in working against systemic racism and promoting more inclusive language.

BACKGROUND

The City Planning Commission is often presented with development projects that include restricted affordable housing units at a variety of income levels. The highest income category found in the Los Angeles Municipal Code is Workforce Income, which refers to households earning between 120 and 150 percent of the Area Median Income (AMI). Though it is only referenced for a particular purpose in the Greater Downtown Housing Incentive Area, the term is often used by development proponents in other areas of the city as an income category they propose to accommodate as part of a discretionary entitlement request. The term is also used more generally in housing policy discussions, usually in the context of identifying middle income groups that are not served by current affordability programs, which generally target lower income households. Another potential official reference the City may encounter is the Workforce Housing Program administered by the California Statewide Communities Development Authority (CSCDA).

The Los Angeles Municipal Code (LAMC) reference is in Section 12.22A.29, which is the set of exceptions for the Greater Downtown Housing Incentive Area. Workforce Income is one of the allowable income categories for which units can be provided in exchange for development incentives in this area. This income category is defined in this section as “the annual income of a household that does not exceed 150% of the Area Median Income as determined by HUD, or any successor agency.” This LAMC reference has been proposed to be deleted, as part of the DTLA Community Plan Update, already approved by the City Planning Commission and awaiting final City Council action. Upon adoption of the DTLA Plan, this reference will no longer exist in the LAMC.

DISCUSSION

Proposed Advisory Notice

The proposed Advisory Notice states the intention of the City Planning Commission to discontinue the use of the terms Workforce Housing and Workforce Income. It states the reasons for the discontinuance, in line with the Commission’s prior discussion on this topic. In short, the terms incorrectly imply that lower income households are not part of the workforce and carry negative historical implications in terms of identifying who is (and is not) deserving of public assistance such as affordable housing. The Advisory implements the Commission’s formal efforts to address systemic bias in the use of language that inflicts harm.

The Notice requests that all members of the Commission and staff use alternative terms whenever possible. When detailed income categories are being discussed, official state and federal terms should be used, as should specific AMI levels. Staff can simply use the “120-150% AMI” terminology or follow the lead of the Los Angeles Housing Department (LAHD), who uses the term “Moderate 150%” to refer to the 120% to 150% AMI income range. City Planning

has consulted with the Los Angeles Housing Department, who agrees with the intent of the notice.

CONCLUSION

The proposed Advisory Notice Regarding the Use of the Term Workforce Housing is attached as Exhibit A. For any questions, please reach out to the City Planning Commission office (cpc@lacity.org) or the Housing Policy section of the Department of City Planning (planning.housingpolicy@lacity.org).

Exhibit A

**DEPARTMENT OF
CITY PLANNING**

COMMISSION OFFICE
(213) 978-1300

CITY PLANNING COMMISSION

SAMANTHA MILLMAN
PRESIDENT

CAROLINE CHOE
VICE-PRESIDENT

JENNA HORNSTOCK
HELEN LEUNG
KAREN MACK
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**CITY OF LOS ANGELES
CALIFORNIA**



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ARTHI L. VARMA, AICP
DEPUTY DIRECTOR

LISA M. WEBBER, AICP
DEPUTY DIRECTOR

**EXHIBIT A
ADVISORY NOTICE RELATIVE TO THE USE OF THE TERM WORKFORCE HOUSING**

TO: INTERESTED PARTIES

FROM: THE CITY PLANNING COMMISSION

EFFECTIVE DATE: APRIL 20, 2023

APPLICABILITY AND INTENT OF THIS NOTICE:

The purpose of this notice is to alert the public to the City Planning Commission's position relative to the use of the terms "workforce housing" and "workforce income." The City Planning Commission expresses its deep concern and this notice serves to advise the Department of City Planning, members of the public, project applicants and other representatives of the City that the Commission has discontinued use of this term in all its official communications and documents and urges others to do the same.

BACKGROUND:

Over the years workforce housing has become part of the vernacular in housing policy. While it is used in a variety of contexts, the term is most often used to indicate a housing program targeted at households that earn too much to qualify for traditional affordable housing subsidies. The term is referenced in the Los Angeles Municipal Code as part of the Greater Downtown Housing Incentive Area (LAMC Section 12.22A.29), where Workforce Income is one of the allowable income categories that can be provided to obtain certain development incentives. Workforce Income is defined as "the annual income of a household that does not exceed 150% of the Area Median Income as determined by HUD, or any successor agency." Because it is currently the only LAMC definition that covers this income category, the term has also been used in other contexts outside of downtown.

The Merriam Webster definition of "workforce" refers broadly to all "workers engaged in a specific activity or enterprise," or the "number of workers potentially assignable for a particular purpose." When workforce is used in the affordable housing context, however, it becomes a term of exclusion by implying that households with other, lower income levels are not part of the workforce. While some may be unable to work due to a disability, age or other reasons, the vast majority of households residing in affordable housing are part of the workforce. Therefore it works against the equity agenda of this Commission to single out a higher income bracket as being part of the workforce, while implying that others who earn lower wages are not. Not affording certain jobs dignity and respect also makes it easier to tolerate low wages and poor working conditions, further perpetuating inequality and systemic racism.

2022 Los Angeles County Area Median Incomes (AMIs) and Sample Occupations

	Very Low Income (0-50% AMI)	Low Income (50- 80% AMI)	Moderate Income (80-120% AMI)	120-150% AMI
2022 HUD Income Range (1 Person)	\$0 - \$41,700	\$41,701 - \$66,750	\$66,751 - \$100,100	\$100,101 - \$125,100
Sample Occupations*	Home Health Care Nursing Asst. Food Prep Childcare Retail/Cashier	Transportation Office Production Sales Construction	Elem. Teachers Sales Rep Electricians Human Resources Accountants	Architects Police Reg. Nurse Dental Hygienist Sales Manager
Los Angeles Count occupation and wage data taken from the State of California's Employment Development Department's Occupational Employment and Wage Statistics (OEWS) website , 1Q 2022.				

Workforce housing also has several negative historical implications. As part of the Commission's formal efforts to address systemic racism, it is imperative to correct harmful language. The term "workforce housing" has roots in anti-affordable housing discussions, where opponents of affordable housing would argue that housing policies should target the "deserving poor" or that certain jobs should be prioritized because they are more important (often the discussion centers around occupations such as nurses, firefighters, and teachers). Others have used the term as a way to fight negative stereotypes that some neighbors have against affordable housing regarding issues such as crime and property values (all of which have been repeatedly disproven). However, this language only reinforces negative stereotypes and therefore does not advance the cause of equity.

This advisory implements the Commission's formal efforts to address systemic bias by being mindful of language that inflicts harm, even if inadvertently. Moving forward, the Commission is committed to language that is inclusive and respectful to all members of our community and avoid any terminology that results in the othering of or demeaning members of the public, particularly lower income communities of color.

Finally, it is worth noting that the City Planning Commission acted on September 12, 2021 to recommend the removal of this term from the Los Angeles Municipal Code through the approval of the DTLA 2040 Community Plan update. Once acted upon by the City Council this code change will be effective.

CONCLUSION

The Commission encourages all members of the Commission and staff to use alternative terms whenever possible. When detailed income categories are being discussed, official state and federal terms should be used, as should specific AMI levels. Staff can follow the lead of the Los Angeles Housing Department (LAHD), who uses the term "Moderate 150%" to refer to the 120% to 150% AMI income range, or simply use the "120-150% AMI" terminology. While the Workforce Income term remains in the LAMC, and in state programs, the Commission acknowledges that some formal documents such as staff reports and affordability covenants may need to continue to use the workforce term for legal reasons. However, the Commission asks the term be used as infrequently as possible, and not in public discussions.

April 17, 2023

Submitted electronically

City Planning Commission
Los Angeles City Hall
200 N. Spring Street
Los Angeles, CA 90012
Email: cpc@lacity.org

**RE: Item 8: CPC-2016-2905-CPU (Boyle Heights Community Plan Update,
CEQA: ENV-2016-2906-EIR)**

Dear President Millman and Members of the City Planning Commission:

The Los Angeles Conservancy thanks the City for preparing the Boyle Heights Community Plan Update (CPU) and for the opportunity to provide comment to the City Planning Commission. The CPU is the culmination of many years of outreach and will guide development in Boyle Heights for the next twenty years. Because of its long-term application, it is vital for the City to provide a considered and comprehensive Community Plan that successfully plans for and protects some of Los Angeles's most important historic resources.

Boyle Heights is among the oldest neighborhoods in Los Angeles and was developed as one of the city's first residential suburbs. Referred to as the "Ellis Island of the West Coast" by longtime residents and historians alike, Boyle Heights reflects Los Angeles's diverse history and built heritage. Historic properties in the Boyle Heights Community Plan Area (CPA) are particularly at risk given the low percentage of designated historic resources and the increased levels of new and proposed development. According to the DEIR for the Boyle Heights Community Plan Update, there are a total of 153 parcels in the CPA identified as historic properties either individually or as contributors in a historic district. At the time of this writing, only 19 Historic-Cultural Monuments (HCMs) and no Historic Preservation Overlay Zones (HPOZs) are located in the CPA. Eight properties have been listed in the National Register of Historic Places. The CPU offers a unique opportunity to incentivize and plan for more proactive, robust protections for historic resources.

We submit the following comments to further ensure the intent and goals associated with historic resources effectively avoid and mitigate against significant and harmful impacts.

We support the following updates:

- Two-story height limit and application of "Character Commercial 1" Frontage in the Brooklyn Avenue Neighborhood Corridor (HCM #590)
- New zoning and use districts to retain existing longtime corner stores and legacy businesses in residential neighborhoods



Boyle Heights Community Plan

Los Angeles Conservancy

Page 2

- New zoning applied through character frontages and requirement that new infill development responds to neighborhood characteristics of historic neighborhoods in Community Plan Implementation Overlay (CPIO) Subarea B
- Improve compatibility between industrial land and residential neighborhoods through new zoning to limit future uses to light manufacturing, storage and distribution, and office space so industrial land uses do not adversely impact human health and the environment
- Use of CX2 and CX5 to feature a maximum size limit to ground story commercial to support existing and future small and longtime neighborhood-serving business

We do not think the Plan goes far enough in these areas and recommend the following:

- To provide consistency in the CPU, CPIO Historic Preservation Subarea B should be further expanded to include all local, state, and National Register eligible and identified historic districts, planning districts, and bungalow court properties in the CPA. This includes, but, is not limited to such historic resources as Stone Street Residential Historic District, Estrada Courts, and 1415-2417 Malabar Street Bungalow Court, all of which remain vulnerable to redevelopment and degradation.
- To address the affordable housing shortage and displacement concerns, we recommend adding demolition and permit delays for projects where an existing structure is 45 years of age or older in CPIO Subareas A and B
- Apply “CX5” Use District to a portion of First Street between Mathews and Fickett Streets where there is a concentration of small legacy businesses

With respect to preserving and celebrating Boyle Heights’ cultural heritage, a strong emphasis has been placed on ensuring new development is compatible with existing eligible residential historic districts and the designated Brooklyn Avenue Neighborhood Corridor (HCM #590) on Cesar Chavez Boulevard. While this approach is appreciated, it is limiting in its ability to preserve existing older and historic housing stock and significant finite historic resources in Boyle Heights.

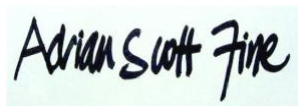
The Conservancy has pressed for ways to strengthen these proposed provisions and additional aspects of the Boyle Heights Community Plan to support the preservation of historic resources. Thank you for all the City’s hard work in crafting this plan and for your consideration of our recommendations.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

Sincerely,



Adrian Scott Fine
Senior Director of Advocacy

cc: Council District 14, Kevin de León
Office of Historic Resources





Our Eastside: By Us, For Us
3467 Whittier Blvd., Los Angeles, CA 90023

Los Angeles City Planning Commission
200 N. Spring Street, Room 340
Los Angeles, CA 90012
cpc@lacity.org

Delivered via electronic mail

April 17, 2023

RE: Proposed Boyle Heights Community Plan Update

Honorable Commissioners,

The Eastside Leadership for Equitable and Accountable Development Strategies (Eastside LEADS) Coalition is pleased to offer the following comments and policy recommendations to advance equity and racial justice in the Boyle Heights Community Plan Update (BHCPU). We appreciate the Planning Department for their engagement and thoughtful consideration throughout the past few years, including working with the Eastside LEADS coalition to familiarize the community with the BHCPU process and hear from community members on the needs of Boyle Heights residents.

Eastside LEADS is a coalition made up of residents and community organizations working in the Eastside of Los Angeles and committed to creating an inclusive, meaningful process that is responsive to the needs of existing residents and stakeholders. Together, we are working to ensure that development in the Eastside of Los Angeles – including the neighborhoods of Boyle Heights, Lincoln Heights, El Sereno, City Terrace, and East Los Angeles – is both equitable and accountable to longtime resident needs and priorities. We are actively working to support residents as they engage in the community planning process of the City of Los Angeles and Los Angeles County.

Background on Boyle Heights

Boyle Heights has long been ignored by traditional institutions like the City, commercial banks, and investors. Despite this, the local community has thrived because of a rich presence of cultural resources and a deep social network. However, as investors now turn their eyes toward Boyle Heights, existing residents are at risk of suffering new and deepening harms, including displacement and gentrification, which paired with the economic impacts of the COVID-19 pandemic, make displacement a looming threat for the large low-income renter population. According to the COVID-19 Neighborhood Profile of East LA conducted by the USC Sol Price Center for Social Innovation, “East LA has had the third highest

cases of COVID-19 and 7th highest deaths in LA County.”¹ Furthermore, the same study highlights how 22% of residents do not have access to internet connectivity and 25% have limited English language proficiency. These gaps in technology and language literacy have made it very difficult for these households to apply to local and State aid programs, sending these households into deeper debt and making their journey to economic recovery more difficult.

Recommendations

1. Maintain policies that support the existing Boyle Heights community and prevent displacement.

There are a number of key policies and programs that Eastside LEADS has advocated for over the past several years, and we are pleased that they are now included in the Proposed Plan. These include:

- The addition of an Acutely Low-Income option in the Community Plan Implementation Overlay (CPIO) District. A central shortcoming of Federal housing subsidies’ ongoing reliance on large Area Median Income (AMI) geographies is low-income strata that are much higher than working families’ actual income. Inclusion of an Acutely Low-Income category for families earning 0-15 percent of the AMI will allow families most in need to qualify for the affordable housing that the BHCPU will make possible.
- The requirement that any development that uses the CPIO provide at least 30% of the units as 2-bedroom units or larger. As the average household in Boyle Heights has 4 members, the CPIO’s 2-bedroom or larger requirement reflects the BHCPU’s commitment to facilitating housing opportunities for local residents.
- The limitation on square footage for commercial storefronts along key commercial corridors to 5,000 square feet, ensuring that affordable commercial rentals will continue to exist in the community and provide a pathway for local businesses to survive. Commercial development is often a key driver of residential gentrification, steadily changing what type of resident a community’s infrastructure is designed to serve. With this policy, Boyle Heights’ vibrant local entrepreneurs will have a place in the future of this community.

2. Reject the proposal to exempt 100% affordable housing projects from the requirement to provide 30% of a project’s units as 2-bedroom units or larger. The proposed CPIO District program has long included a provision that requires 30% of residential units to include at least 2 bedrooms. Eastside LEADS has previously expressed its strong support for this provision, as it is desperately needed to serve multigenerational families with children that are prevalent in Boyle Heights and are often forced into overcrowded housing.

Eastside LEADS welcomes and supports 100% affordable housing in Boyle Heights, but studio or 1-bedroom affordable housing units would simply not serve the vast majority of local residents, who disproportionately need larger units. As a result, we request that the Planning Commission reject this recent amendment.

3. Include stronger protections to protect against the loss of rent stabilized units and other naturally occurring affordable housing units. According to the DEIR, Boyle Heights has lost four percent (-4%) of its housing stock from 2010-2016, compared to a housing stock growth of three percent (3%) Citywide during the same time period.² While much of the proposed Community Plan update

¹ USC Price Center for Social Innovation, “COVID-19 Neighborhood Profiles,” last accessed Dec. 22, 2021, available at <https://usc.data.socrata.com/stories/s/wtbf-fzfa>.

² Los Angeles Department of City Planning, “Draft Environmental Impact Report: Boyle Heights Community Plan Update” (July 2022) at 4.12-4, available at

focuses on the production of desperately needed new housing, it should not be done at the expense of current naturally occurring affordable housing in the neighborhood. There are several proposed policies and programs in the proposed Community Plan that would avoid this self-defeating result, including a policy requiring the 1-for-1 replacement of demolished residential units and the creation of a right of first refusal program to allow temporarily displaced residents to return. However, for these policies to meet their promise, they must be implemented and not merely encouraged.

As such, we are proposing the following line amendments to the Proposed Plan's Land Use policies:

LU 1.3: ~~Ensure~~ **Require** that each recently occupied housing unit demolished as a result of new development is replaced on-site, and offered back to former residents at rent levels previously paid.

LU 1.4: ~~Discourage~~ **Prohibit** permits from being issued for the demolition of multi-family buildings until a project providing an equivalent or greater number of units is approved.

LU 2.2: ~~Limit~~ **Cap** the conversion of existing affordable and rent stabilized units into for-sale units in order to avoid reducing the supply of affordable rental units locally.

4. Draft specific policies that support the development of Community Land Trusts (CLTs) in Boyle Heights. The Proposed Plan's LU 3.7 already requires the development of "strategies to assist "community land trusts and affordable housing developers with property acquisitions," and LU 1.5 already directs the use of "public land and funding for the development of supportive housing projects and affordable housing for extremely-low, very-low, and low-income households." These policies can and should meet in a specific policy requiring the consideration of CLT ownership in the disposition or development of public land in Boyle Heights.

5. Require mixed income projects to utilize HCD 6 rents (Schedule 6) for affordable units. Consistent with longstanding City policy, affordable units in mixed income projects created under the CPIO incentives should follow California State Department of Housing and Community Development's (HCD) Schedule 6 rents. The March 2023 AECOM feasibility analysis determined that the community benefits program was feasible when utilizing HCD rents in many scenarios. The City should not allow increased rents on Extremely- and Very-Low Income households in mixed income developments under the BHCPU. While the Department's explanatory materials reference Schedule 6, the draft CPIO and Article 9 appear ambiguous.³ We are concerned with LAHD's decision to shift mixed-income Transit Oriented Communities (TOC) projects to Schedule 1 HUD rents citywide and are asking that the current ambiguity be resolved in the CPIO so that the longstanding practice of utilizing HCD Schedule 6 rents will be continued in Boyle Heights.

6. Finally, the proposed Community Plan must require the Planning Department to effectively monitor demolition projects in Boyle Heights in order to ensure that the aforementioned 1-for-1 replacement and right of return policies are implemented. Given the large number of policies in the Proposed Plan that intervene in instances of demolition, drafting a separate policy that requires monitoring of demolition projects is crucial to ensuring the implementation of the Proposed Plan as a whole.

https://planning.lacity.org/eir/BoyleHeightsCPU/sections/Consolidated_BHCPU_DEIR_FINAL.pdf (hereinafter referenced as "DEIR").

³ Los Angeles Department of City Planning, "Boyle Heights Community Plan Update: Affordable Housing Incentive Program." Spring 2023, available at https://planning.lacity.org/odocument/a59a52d5-2e54-44ea-994d-1f48b90070f3/202303_BH_Handout1_AH-IncentivesProgram.pdf

The Boyle Heights Community Plan presents an important and timely opportunity to establish a framework for equitable growth and just recovery for a long-ignored neighborhood at the heart of the City of Los Angeles. If done right, this Plan can protect current Boyle Heights residents, create new opportunities for safe and affordable housing, and support legacy, community-serving small businesses. Thank you for considering these recommendations and please reach out with any questions.

Sincerely,

The Eastside LEADS Coalition

Alliance for California Traditional Arts
Community Power Collective
East LA Community Corporation
InnerCity Struggle
Latino Equality Alliance
Legacy LA
Public Counsel
Self Help Graphics & Art
The Wellness Center

DAY OF HEARING SUBMISSIONS



Department of City Planning

City Hall, 200 N. Spring Street, Room 272, Los Angeles, CA 90012

April 19, 2023

TO: City Planning Commission

FROM: Craig Weber, Principal City Planner

TECHNICAL MODIFICATION/CORRECTION TO THE AGENDA FOR THE APRIL 20, 2023 CITY PLANNING COMMISSION SPECIAL MEETING; STAFF RECOMMENDATION REPORT; AND EXHIBITS A.1, A.3, B.1, B.2 FOR CASE NO. CPC-2016-2905-CPU; ENV-2016-2906-EIR

The following technical modifications/corrections are to be incorporated into the special meeting agenda, the staff recommendation report, and Exhibits A.1, A.3, B.1, and B.2 to be considered at the City Planning Commission meeting of Thursday April 20, 2023, related to Item No. 8 on the meeting agenda.

Deleted text is shown in strikethrough and added text is shown in underline.

1. **Modification to the CPC Special Meeting Agenda** for April 20, 2023 to reflect a corrected time to act date, from ~~7-19-2023~~ to 6-28-2023.
2. **Modification to Chapter II of the Boyle Heights Community Plan Implementation Overlay (CPIO) District (Exhibit B.1)**, to include the following under II-2. Eligibility:
 3. Dwelling Units. All units in an Eligible Housing Development shall meet the definition of a "Household Dwelling Unit" as defined in LAMC Ch. 1A Div. 14.2.
3. **Modification to Chapter V of the Boyle Heights Community Plan Implementation Overlay (CPIO) District (Exhibit B.1)**, to include the following:
 - a. Add parcels with Assessor Parcel Number 5172015900 to the Subarea D map.
 - b. Add parcels with Assessor Parcel Numbers 5410009901 and 5410009907 to the Subarea D map.
 - c. Add parcels with Assessor Parcel Numbers 5171015906 and 5171015905 to the Subarea D Map.
4. **Revisions to the Zoning Map (Exhibit B.2):**

- a. Change parcels with Assessor Parcel Number 5410009901 and 5410009907 from the zone [VF2-WH1-4][P1-FA][CPIO] to the zone [LM4-WH1-4][P2-FA][CPIO].
- b. Change the parcels with Assessor Parcel Number 5172015900 (361 S. Anderson Street) from the zone [VM2-WH1-4][IX5-FA][CPIO] to the zone [LM4-WH1-4][P2-FA][CPIO].
- c. Change parcels with Assessor Parcel Number 5171015906 and 5171015905 from the zone [VM1-GW1-3][IX5-FA][CPIO] to the zone [LM4-WH1-4][P2-FA][CPIO].
- d. Change parcels with Assessor Parcel Number 5180008908 (318 N. Mathews Street) from the zone [LN1-MU3-4][RX2-6][CPIO] to the zone [VF2-WH1-4][OS1-N][CPIO].

5. Revisions to the Proposed General Plan Land Use Map (Exhibit A.3):

- a. Change the Land Use Designation of the parcels with Assessor Parcel Number 5172015900 (361 S. Anderson Street) from Light Industrial to Public Facilities
 - b. Change the Land Use Designation of the parcels with Assessor Parcel Number 5171015906 and 5171015905 from Light Industrial to Public Facilities.
 - c. Change the Land Use Designation of the parcels with Assessor Parcel Number 5180008908 (318 N. Mathews Street) from Medium Neighborhood Residential to Open Space
6. Where revisions to the General Plan Land Use Designation Map (Exhibit A.3) are made as noted in (5) above, revise the related inset maps, acreages, and percentages in the General Plan Land Use Descriptions section of Chapter 1 of the **Community Plan Text (Exhibit A.1)**.

7. Staff Report Corrections:

- a. Amend the Staff Recommendation Report dated 4/20/2023 to read as follows:
 - i. Page A-10: "...and ~~introduces~~ presents for Commission consideration a new income category for Acutely Low Restricted Affordable Units, for households making 0-15 percent of the Area Median Income (AMI). With nearly 23% of persons in Boyle Heights estimated to have incomes below the poverty level, compared to 16% citywide (ACS, 2021), this would ~~introduces~~ affordable housing that is more affordable and accessible to households in Boyle Heights."
 - ii. Page A-35: "Of note, the Plan presents for Commission consideration ~~CPIO would establish~~ an Acutely-Low Income category, which is intended to create new affordable housing units for households that earn 0-15 percent of Area Median Income."
 - iii. Page F-8: "The Proposed CPIO District's Community Benefits Program subarea introduces a requirement that mixed-income projects include 30 percent of units in a new development as 2 -bedroom units or greater and

presents for Commission Consideration ~~introduces~~ a new income category for Acutely Low Restricted Affordable Units, for households making 0-15 percent of the Area Median Income (AMI). This would ~~introduces~~ affordable housing that is affordable to households in Boyle Heights and requires new mixed-income developments utilizing the program to include units that can accommodate multi-generational and other larger household sizes.”

- iv. Page F-11: “Finally, the Proposed Plan Community Benefits Program introduces a requirement that projects include 30 percent of units in a new development as 2-bedroom units or greater and presents for Commission consideration ~~introduces~~ a new income category for Acutely Low Restricted Affordable Units, for households making 0-15 percent of the Area Median Income (AMI). This would ~~introduces~~ affordable housing that is affordable to households in Boyle Heights and requires new mixed-income developments utilizing the program to include units that can accommodate multi-generational and other larger household sizes.”



Department of City Planning

City Hall, 200 N. Spring Street, Room 525, Los Angeles, CA 90012

April 19, 2023

TO: City Planning Commission

FROM: Alex Truong, City Planning Associate

TECHNICAL MODIFICATION TO THE STAFF RECOMMENDATION REPORT FOR CASE NO. CPC-2021-10170-GPA-ZC-HD; 1200-1210 NORTH CAHUENGA BOULEVARD; 6337-6357 WEST LEXINGTON AVENUE; 6332 – 6356 WEST LA MIRADA AVENUE

The following technical modifications are to be incorporated into the staff recommendation report to be considered at the City Planning Commission meeting of April 20, 2023, related to Item No. 7 on the meeting agenda.

“D” DEVELOPMENT LIMITATIONS

1. **Height.** The project shall be limited to four (4) stories and ~~61 feet (61')~~ 65 feet 5 inches (66'-5"). Roof structures and equipment may exceed the height limit, as permitted in LAMC Section 12.21.1-B,3.



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T 213.694.3141
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April 18, 2023

Via E-mail

Honorable Members of the City Planning Commission
City of Los Angeles
200 North Spring Street, Room 210
Los Angeles, CA 90012
E-mail: cpc@lacity.org

**Re: 1200 Cahuenga Project: CPC-2021-10170-GPA-ZC-WDI
Proposed Planning Conditions of Approval
Applicant Technical Condition Comment Letter No. 1**

Honorable Members of the City Planning Commission:

We write today on behalf of the applicant for the 1200 Cahuenga project ("Project"), Cahuenga Boulevard Owner, LLC ("Applicant"), to request certain revisions to "D" Development Limitation No. 2 of the proposed "D" Development Limitations identified in the Department of City Planning Recommendation Report for the April 20, 2023 City Planning Commission hearing for the Project.

"D" Development Limitation No. 2:

Current draft condition:

Height. The project shall be limited to four (4) stories and 61 feet (61'). Roof structures and equipment may exceed the height limit, as permitted in LAMC Section 12.21.1-B,3.

Proposed revision:

Height. The project shall be limited to four (4) stories and 66 feet 5 inches (66'-5"). Roof structures and equipment may exceed the height limit, as permitted in LAMC Section 12.21.1-B,3.

This revision is being requested because the height was inadvertently measured between the adjacent grade and the roof in a previous set of entitlement plans. The height is currently revised to be measured from the lowest grade within 5 feet of the building parameter to the highest point of the roof, structure, or the parapet wall, whichever is highest. Due to the change in the method of measurement, the measured height of the buildings increased. The physical



Page Two

massing of the building structures remains the same as previously shown in the Hearing Officer hearing and the structures did not increase in height.

Thank you for your time and consideration. We are happy to answer any questions you may have.

Best regards,

A handwritten signature in black ink, appearing to read 'K. Casper', with a stylized flourish at the end.

Kyndra Casper

*Cc: Alexander Truong, City Planning Associate (alexander.truong@lacity.org)
Oliver Netburn, City Planner (oliver.netburn@lacity.org)*

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139 South Hudson Avenue
Suite 200
Pasadena, California 91101

VIA E-MAIL

April 19, 2023

Alexander Truong Planning Associate
City of Los Angeles
200 North Spring Street, Room 763
Los Angeles, CA 90012
Em: alexander.truong@lacity.org

RE: City of Los Angeles, 1200 North Cahuenga Boulevard Project (CPC-2021-10170-GPA-ZC-WDI ENV-2021-10171-MND)

Dear Mr. Truong:

On behalf of the Southwest Mountain States Regional Council of Carpenters (“**Southwest Carpenters**” or “**SWMSRCC**”), my Office is submitting these comments for the City of Los Angeles’ City Planning Commission meeting addressing the 1200 North Cahuenga Boulevard Project (CPC-2021-10170-GPA-ZC-WDI, ENV-2021-10171-MND) (“**Project**”).

SWMSRCC would like to express its support for this Project. After further reviewing this Project, SWMSRCC believes that the Project will benefit the environment and the local economy by practicing protocols that will protect worker health and safety and will incorporate adequate environmental mitigation.

Should the City have any questions or concerns, it should feel free to contact my office.

Sincerely,



Talia Nimmer, Esq.

Attorneys for Southwest Mountain States
Regional Council of Carpenters



Planning CPC <cpc@lacity.org>

Boyle Heights EIR Comment

Knighton, Andrew <aknight@exchange.calstatela.edu>

Thu, Apr 20, 2023 at 8:00 AM

To: "cpc@lacity.org" <cpc@lacity.org>

Cc: "rsagara@laconservancy.org" <rsagara@laconservancy.org>, "Knighton, Andrew" <aknight@exchange.calstatela.edu>

Greetings,

First, let me thank the city and all the various stakeholders for undertaking the difficult consultative process that has led to the Boyle Heights draft EIR under consideration today. I endorse an overall vision of encouraging infrastructural improvements to public transit and mobility with a sensitive program for protecting historic resources and mitigating the human costs of displacement. I encourage revision of the plan to more clearly emphasize these latter principles.

It is of particular importance that we reinforce the centrality of small businesses in the neighborhood; the guidelines for commercial frontage in the Brooklyn Avenue Neighborhood Corridor and the embrace of neighborhood stores are welcome gestures in that direction. I encourage the extension of these guidelines to small business districts along First Street as well, especially at Fickett street, and between Cummings and Soto as well, where a sensitive strategy could pay huge dividends. Additionally, it is crucial to develop protections for multi-family housing structures in the area, many of which are not only crucial for housing in this dense area, but also contribute to the historical character of the neighborhood (I think in particular of the Rudolph Schindler apartment building just north of First and Soto!). I encourage a fuller inventory of potentially significant properties be conducted in a revised plan.

As a longtime resident of Boyle Heights, I have been energized by the way this neighborhood – unlike any other I know of – is defined by the tendrils of lived history that organically link its residents, its housing, and its infrastructure. I have lived here for a dozen years, and am still thought of as the “new guy” on my block. And as I learn more about the many ways the history of this district is inscribed in its small businesses, in the durable facades of its homes and businesses, and in the pathways traversed by its people on their ways to work, school, worship, and play, and am ever more convinced that this neighborhood deserves a unique conservation strategy. Such a strategy should meet the challenges of the present by resisting its worst impulses toward accelerated gratification and quick profit. Let the roots of this neighborhood remain as undisturbed as possible, so that its shade trees can continue to create comfort for those who dwell here.

Accordingly, I endorse the findings of the LA Conservancy and encourage a thoughtful approach to development balanced with genuine concern for protecting what is unique and meaningful about Boyle Heights and its residents. I appreciate the efforts invested in drafting the draft EIR, and hope it will go further in protecting these legacies.

Thank you for the opportunity to share my thoughts on this matter.

Sincerely,

Dr. Andrew Lyndon Knighton

3rd and St. Louis



Planning CPC <cpc@lacity.org>

Boyle Heights

adthdfyr@aol.com <adthdfyr@aol.com>

Tue, Apr 18, 2023 at 6:47 PM

Reply-To: adthdfyr@aol.com

To: "cpc@lacity.org" <cpc@lacity.org>

Cc: "rsagara@laconservancy.org" <rsagara@laconservancy.org>

Please do not allow Boyle Heights to become gentrified. Boyle Heights is a vibrant Hispanic working-class community with a rich cultural heritage which must be preserved. Boyle Heights does not need art galleries, chain stores, skyscrapers, mansions or luxury condos. Such developments and businesses are incompatible with Boyle Heights' heritage.

Thank you.



Kevin de León
Councilmember, Fourteenth District

April 19, 2023

Submitted Electronically

Ms. Samantha Millman, President, and Commissioners
City Planning Commission
City of Los Angeles
200 North Spring Street
Los Angeles, CA. 90012

**Re: Item 8 - Boyle Heights Community Plan Update
CPC-2016-2905-CPU**


Dear President Millman and Honorable Commissioners:

Throughout its history, Boyle Heights has been a multicultural community, often a landing pad for recent immigrants and immigrant communities, variably consisting of displaced Indigenous peoples; immigrants from Eastern Europe – many of whom were Jewish. Mexicans crossed by the shifting U.S. border; Japanese immigrants; African-Americans; Armenians; Italians. Over the past half century, Boyle Heights gradually became an almost all-Latino neighborhood consisting of diverse Latino cultures.

Unfortunately, the Boyle Heights community has also been subject to urban renewal policies that have had negative impacts. These policies have included the construction of freeways - the 5, 10, 60, 101, and 210 freeways - that have dissected the community and made Boyle Heights the neighborhood with the most freeways in the City, the development of large public housing projects situated next to these freeways, and the

permitted industrial facilities adjacent to residential areas exposing the community to dangerous air pollutants and toxins for decades.

Ironically, affordable housing, whether newly constructed or renovated, often remains inaccessible to the very community it is intended to serve. One such case is the historic Boyle Hotel located next to Mariachi Plaza. The hotel was once home to mariachis, working musicians with deep cultural ties to the surrounding community, who gave the adjacent plaza its name. In 2012, an affordable housing developer renovated the hotel with the promise of better housing conditions and improved living standards for the mariachis.

However, the increased rents made it unaffordable for the very population that ostensibly the renovated hotel was intended to serve. As a result, the tenants of the Boyle Hotel were replaced by individuals from outside the Boyle Heights community, forcing the previous tenants to seek housing outside of the community they had once called home but could no longer afford. This displacement of the mariachis and other longtime residents has had a profound impact on the community, as Mariachi Plaza is now notably emptier of the performers for whom the plaza is known.

Tenant displacement is a recurring issue throughout the Boyle Heights community, and the Boyle Hotel is just one of numerous examples of it happening. Boyle Heights maintains a disproportionately large share of multi-family zoning in comparison to other parts of the city and yet affordable housing has been produced in a way that has not benefited local residents. **It's imperative to establish a process whereby residents of this community will have a viable opportunity to actually live in these new affordable units.**

To address this very issue, I introduced a motion calling on our City leadership to evaluate the Federal Fair Housing Act, assess its unintended consequence of contributing to displacement by impeding access by local residents, and to promote a policy to give equitable preference to eligible local residents to prevent egregious acts of displacement from happening in the future. The goal of this will also help to ensure that the community can directly benefit from the affordable housing produced in their *own* neighborhood.

In the meantime, we now have an opportunity to make a substantive change. We cannot simply pat ourselves on the back for creating "affordable housing" if we fail to address the obvious displacement that results when it is built without regard to the needs of *existing community members*, many of whom are rent-burdened and housing-insecure. **How can we claim to be tackling our City's housing crisis if the**

overwhelming majority of residents cannot afford to live in the affordable units being built in their own community?

My office's recent experience with the COVID-19 pandemic revealed ongoing structural inequities in the Boyle Heights community, including food insecurity, severely overcrowded housing conditions, and vulnerable households - particularly seniors on fixed-incomes. There are over 23,000 units in Boyle Heights and renters make up 75% of those households. According to the most recent census data, there is an average of four people per housing unit. In most of these households, multi-generational families share a single unit. Families of five, six, or more reside in cramped studios and one bedroom apartments because units of a more appropriate size remain unaffordable or simply do not exist in adequate supply to meet the demand.

In the past year alone, 25% of demolitions in my district took place in Boyle Heights alone. Of those demolitions, 35% were units subject to the City's Rent Stabilization Ordinance (RSO). As we reflect on the COVID-19 pandemic, we can see clearly that the hardest hit neighborhoods were those with three times the average rate of overcrowding - defined as more occupants than rooms - and twice the rate of poverty. It comes as no surprise that Boyle Heights was one of the epicenters of the pandemic across all of Los Angeles County.

The City enacted the COVID-19 emergency eviction moratorium in order to protect renters from losing their housing during a time of unprecedented threats to economic and social stability. Despite the protections, residents of Boyle Heights were still illegally evicted. Now that the decision to lift the moratorium has taken effect, eviction assistance requests have dramatically increased and my office has been inundated with calls from my constituents in Boyle Heights pleading for help to prevent their displacement. When an eviction happens in Boyle Heights, it is rarely a single person that loses their housing. An eviction in Boyle Heights will almost always leave an entire family without housing which too often ends in that family becoming homeless.

Furthermore, there are an estimated 4,300 properties subject to the City's Rent Stabilization Ordinance (RSO). Policies to promote renter protections, such as "first right of refusal" and "no net loss" policies, and protections to regulate demolitions of rent-stabilized units and mitigate the displacement of low-income residents should be reinforced in the plan to make sure they incorporate all of the pieces of the Tenant Anti-Harassment Ordinance.

The lack of affordable housing in Boyle Heights has not only impacted residential tenants, but also the small businesses that make up the community. When demolitions

and evictions occur, the housing displacement that follows can shrink the workforce of legacy businesses and customer bases, and even displace business owners from their own community.

As a result, many small businesses that are fixtures in the Boyle Heights have disappeared, and when residents and legacy businesses leave, gentrification fills the void. The displacement and lack of new housing options for Boyle Heights residents have created an affordability crisis where the people of Boyle Heights can no longer afford to live, work, or run businesses in the neighborhood they have always called home. This has led to a significant loss of community cohesion and is a threat to cultural identity.

Furthermore, the affordability crisis has had a ripple effect on the local economy. When residents and businesses are forced to leave, the tax base is impacted and stores that once filled the needs of community residents disappear. The displacement of residents and small businesses can also result in a loss of neighborhood character and cultural heritage, which is vital to the social fabric of Boyle Heights. Therefore, it's crucial to address the lack of affordable housing and displacement of residents to preserve the community's identity, promote economic growth, and ensure that all members of the community can thrive.

The Boyle Heights Community Plan update presents an opportunity to address contemporary challenges and guide future development. The proposed plan identifies a full range of key community concerns, including the need to stabilize residential neighborhoods, protect renters, produce affordable housing, protect small businesses, create local jobs, plan for industrial areas adjacent to the Los Angeles River in a way that respects the surrounding community, preserves neighborhood identity, and advance environmental justice.

I urge the Commission to thoughtfully consider the following issues and recommendations as you deliberate upon the plan update:

1. Affordable Housing System

Any system that doesn't allow members of a community to access affordable units in their *own* neighborhood is a broken system. Just building affordable housing without ensuring that our community members can continue to reside in our communities is overtly destabilizing.

A local preference policy to fill affordable housing vacancies should be further studied. As an example of a local preference policy, one can consider a process found in the

City of Santa Monica, which has a similar population and geographic size to Boyle Heights, which gives preference to local residents to fill affordable housing vacancies. To receive this preference, the head of household must:

- Live in Santa Monica;
- Work in Santa Monica at least 25 hours per week (or did prior to March 1, 2020, but lost employment due to COVID-19-related reasons);
- Participate in an approved job training program in Santa Monica;
- Have last worked at least 25 hours per week in Santa Monica and now receive unemployment, worker's compensation, vocational rehabilitation benefits, disability benefits, or retirement benefits from the City of Santa Monica.

In addition, as initially proposed, a residential project seeking to utilize the Affordable Housing Incentive Program must meet the following requirements: (1) Include a percentage of the total units as Affordable Units; (2) Include at least 30% of total units with 2 or more bedrooms to accommodate various household sizes, and (3) Include 5 or more units in the project.

However, the proposed plan would create an exemption for 100% affordable housing projects so that they do not need to provide 30% of their units as 2 or more bedrooms. Boyle Heights is in desperate need of affordable family housing. Many residents have 5 people living in a one bedroom apartment. All projects should provide multi-bedroom units so that the community can be better served. Furthermore, this percentage should be increased to 40% to facilitate the construction of more multi-bedroom units.

Finally, the plan needs modifications to provide affordability to residents who make even less than Extremely Low Income (ELI). The plan provides an Affordable Housing Incentive Program that requires developers to build 25% of their units at Lower Income (50-80% of AMI), 15% of their units at Very Low Income (30-50% of AMI), or 11% of their units at ELI (0-30% of AMI). An additional category should be added for Acutely Low Income (ALI) individuals that make 0-15% of the AMI that allows developers to utilize the incentive program if they provide 10% of their units for acutely low income residents.

My recommendations are as follows:

1A. LOCAL PREFERENCE PROGRAM

Request the Department of City Planning to develop a local preference housing program for inclusion in the plan similar to the City of Santa Monica's policy that

provides preference for residents who live in Boyle Heights and work in the City of Los Angeles.

1B. MULTI-BEDROOM REQUIREMENT

Request the Department of City Planning to incorporate for CPIO Sub Area 2 a requirement that all projects with 5 or more units shall provide 40% of units with 2 or more bedrooms and remove the exemption for 100% affordable housing projects stated in the Spring 2023 BCHP Update.

1C. ACUTELY LOW INCOME CATEGORY

Request the Department of City Planning to the Affordable Housing Incentive Program an additional category titled “Acutely Low Income” (ALI) - defined as individuals making between 0-15% of AMI - that allows developers to utilize the program if they provide 10% of their units at ALI.

2. Community Benefits Program

Public agencies in California establish household income limits using the State Department of Housing and Community Development (HCD) data derived from the County’s Area Median Income (AMI) to determine eligibility to various housing assistance programs.

The proposed Community Benefits Program should consider utilizing data specific to the Boyle Heights community in the City of Los Angeles as a more accurate representation. Community stakeholders have rightfully cited USC Price Center’s Neighborhood Data for Social Change (NDSC) platform, which revealed that the average median household income for Boyle Heights in 2016 was \$36,068. In 2022, HCD determined that the Los Angeles County Area Median Income (AMI) was \$91,100. The disparity between the AMI measures could not be more stark or divergent. Ignoring the differences is an invitation to potential displacement of the lowest income residents in Boyle Heights. Utilizing the Los Angeles County AMI would not provide housing that is accessible to the current residents of Boyle Heights and defeat the purpose of addressing the community’s local housing needs.

My recommendation is as follows:

2A. CALCULATION OF AMI

Request the Department of City Planning to establish calculation of AMI based upon the geography of the Boyle Heights community and not the State or Los Angeles County AMIs.

3. River Adjacent Industrial Area

I have significant concerns about the area adjacent to the Los Angeles River - roughly bounded by the 101 Freeway on the north and east, the LA River on the west, and the 10 Freeway on the south. The city has spent half a billion dollars on the construction of the new Sixth Street Viaduct and will shortly be breaking ground on the construction of the new Sixth Street PARC under the bridge. Throughout the community process for these public works projects there has been a constant refrain from the community that these improvements weren't made for them. At every turn, the city has stated that is not true. However, the city's proposed land use policies in the Boyle Heights Community Plan show those to be empty words as both of the below options do not address the concerns of gentrification and affordable housing.

The proposed plan identifies two land-use alternatives: one that preserves industrial land and one that allows for a mix of land uses. For the industrial alternative, I am deeply worried about companies coming in that provide almost no local jobs for the residents of Boyle Heights. Already we see existing buildings being converted for light industrial uses that have zero connection or relation to the neighborhood or that offer little-to-no job opportunities for local residents. For the mixed-use option, I am concerned that it does not mandate affordable housing in each project that is commensurate with the affordable housing needs of Boyle Heights. Furthermore, as I stated previously, there is no plan to ensure that the residents of Boyle Heights have priority access to this housing.

My recommendations are as follows:

3A. INCLUSIONARY HOUSING STUDY

Request the Department of City Planning to conduct an inclusionary housing study of the River Adjacent Area that mandates all projects include at least 60% affordable housing. This study should examine creative incentives the city can provide to developers, such as helping fund off-site street improvements, in order to make the 60% affordable housing goal achievable. Furthermore, the inclusionary housing study should develop incentives so that *tienditas*, small corner stores in residential areas, can be easily added into conversions or new housing projects.

3B. LOCAL HIRE STUDY

Local hire is *often* talked about and touted by the government, but apart from city public works projects, local hire is *rarely implemented well*.

Request the Department of City Planning, in coordination with the Economic and Workforce Development Department and Bureau of Contract Administration, to

conduct a study as a basis to establish a local hire policy which includes a requirement that all projects in the River Adjacent Area implement a local hire program for both the construction and operations of all projects. Furthermore, this study should provide concrete recommendations on how this local hire policy can be enforced by the City.

4. Environment and Public Spaces

Boyle Heights has long been the victim of environmental injustice. Throughout the mid 20th century, homes were torn down and freeways were built - crisscrossing the whole community. One freeway, the 5 Freeway, was built right through Hollenbeck Park - the neighborhood's largest park and open space area. Additionally, the Exide Battery Recycling Plant, located in the City of Vernon, deposited lead over many square miles of Boyle Heights, negatively affecting the health of tens of thousands of people. The pollution from that plant continues to impact residents in the community. A more robust approach must be taken to our public spaces in Boyle Heights, one that remediates decades of pollutants and improves the quality of life for its residents.

I wish to elaborate, as noted below, on the topics of Tree Canopies, Street and Pedestrian Lighting, Open Space, Heat Mitigation and Traffic Safety and their impacts on the quality of life of Boyle Heights residents.

Tree Canopy: A 2020 study by the Bureau of Street Services Urban Forestry Division counted 10,023 street trees in the Boyle Heights Neighborhood Council, with 3,626 vacant tree wells, a stock rate of 71.3%. In contrast, the Greater Wilshire Neighborhood Council, which includes the neighborhoods of Hancock Park and Windsor Square, has 15,449 trees and 2,425 vacant tree wells, a stock rate of 85.2%. There is a clear need for more street trees to increase shade across the community and combat the heat island effect resulting from heat-absorbing materials and a lack of vegetation.

Street & Pedestrian Lighting: A major component of creating a safe environment for pedestrians is adequate street lighting. Current city standards require that projects light the roadway to a higher luminosity than sidewalks. This has created a condition where developments are required to light streets much brighter than sidewalks, creating unsafe situations for pedestrians. A study by the University of Chicago determined that pedestrian lighting can reduce crime by 36%.

Open Space: Boyle Heights is severely lacking in adequate open space. Recreation centers exist throughout the neighborhood, but they are woefully inadequate for the residents. For example, despite Boyle Heights having over 90,000 people, there is only one dedicated soccer field at a city facility for the whole neighborhood. Furthermore,

overall park acreage is severely lacking. The 2016 Los Angeles County Park Needs Assessment showed Boyle Heights has .6 acres of park space per 1,000 people while the LA County average is 3.3 acres of park space per 1,000 people. This ranks Boyle Heights among the worst communities for open space in all of Los Angeles County. The study showed that Boyle Heights rates in the “Very High” Park Need Category.

The City must aggressively pursue the addition of open space in the neighborhood through any means necessary. Government parcels that are underutilized or defunct should be analyzed to determine if they can provide additional park space. Moreover, alleyways in Boyle Heights should be made “green” by improving stormwater capture, adding landscaping and lighting, and planting trees where feasible.

Heat Mitigation: With the continued threat posed by climate change on our city, the city must use every option available to reduce the effects of heat. One of the tools the city has used is the application of “cool pavement” when slurry sealing a street. “Cool pavement” is gray and has been shown to reduce temperatures by 25 degrees. Coupled with the installation of trees, the effects of rising temperatures in the community could be significantly reduced, making it healthier and safer for residents, especially seniors and children.

Traffic Safety: Traffic safety is a major issue in Boyle Heights. A 2022 study by MoneyGeek analyzed 13,851 traffic collisions in Los Angeles between 2020 and 2022. Boyle Heights was rated the 8th most dangerous neighborhood for traffic safety with 305 collisions during that time frame. In that same study, Cesar Chavez Avenue and Soto Street was identified as one of the 86 worst intersections in the city, with at least 10 collisions that resulted in bodily injury or death. We have recently witnessed very tragic accidents in Boyle Heights, including those involving children. The city must take a comprehensive look at traffic safety using all possible tools, including but not limited to increased protections at designated crosswalks that so many of Boyle Heights residents rely on, but especially seniors and children.

My recommendations are as follows:

4A. OFF-SITE TREE PLANTING

Request the Department of City Planning, in coordination with the Bureau of Street Services, to prepare and present a report with recommended language that requires the planting of 36” box trees in the public right of way when the sidewalk and parkway width is 8’ or greater.

4B. PEDESTRIAN LIGHTING

Request the Department of City Planning, in coordination with the Bureau of Street Lighting, to prepare and present a report with recommended language to require that all projects in Boyle Heights require pedestrian and street lighting.

4C. PARK SPACE ANALYSIS

Request the Department of City Planning, in coordination with the Department of Recreation and Parks, to identify all areas of Boyle Heights with high or very high need of a park as identified in the 2016 LA County Park Needs Assessment and identify government-owned properties and right-of-ways of at least 5,000 square feet that could be used for public park space.

4D. GREEN ALLEYWAYS

Request the Department of City Planning, in coordination with the Bureau of Engineering, Bureau of Sanitation, and Bureau of Street Services, to develop policies and standards that require, whenever a development abuts an alleyway, the construction of green alleyways adjacent to all developments that are not 100% affordable housing projects or single family residences.

4E. VEHICLE SPEED LIMITS

Request the Department of City Planning, in coordination with the Department of Transportation, to report back with a list of streets, particularly Boulevards, Avenues, or Collectors, that can be downgraded in order to reduce posted speed limits and targeted operating speeds.

4F. COOL PAVEMENT

Request the Department of City Planning, in coordination with the Bureau of Street Services, to identify areas in Boyle Heights where “Cool Pavement” can be applied to a whole street grid to reduce temperatures across a larger area.

4G. PEDESTRIAN SAFETY IMPROVEMENTS

Request the Department of City Planning, in coordination with the Department of Transportation, to report back with policy recommendations that require developers to upgrade existing marked crosswalks with traffic control devices if the crosswalk is located on the same block as the development. This report should also look at how developers can be required to install new marked crosswalks with traffic control devices on their block if the development is within one-quarter mile of a school or park.

Boyle Heights is home to a diverse group of residents, including low-income families and people of color, who have already been historically marginalized and

disadvantaged. Therefore, the City of Los Angeles holds a duty and responsibility to ensure that the needs and rights of all residents are prioritized.

I urge you to consider the recommendations provided above and to take the necessary actions to protect the residents of Boyle Heights. We cannot let this community continue to face the threats to their potential displacement through gentrification, health disparities, and overall quality of life. I urge you to take into account the diverse composition of the community and ensure that their voices are heard and their needs are met. We must act now to ensure that Boyle Heights is not left behind and that its residents are given the quality of life they deserve.

Sincerely,



KEVIN DE LEÓN

Councilmember, Fourteenth District
City of Los Angeles



Planning CPC <cpc@lacity.org>

Draft Environmental Impact Report for the Boyle Heights Community Plan (EIR)

Dorthy White <dottywhitebiz@aol.com>

Thu, Apr 20, 2023 at 8:29 AM

To: cpc@lacity.org

Cc: rsagara@laconservancy.org

Dear Members of the L.A. City Planning Commission:

I support the L.A. Conservancy's April 17, 2023 position on the Boyle Heights Community Plan and Environmental Impact Report.

Among the first suburbs of Los Angeles, Boyle Heights, has offered shelter over time to indigenous peoples, colonial Spaniards, Mexicans, Japanese, Jewish, Armenians, Yugoslavians, African Americans, Russians, and many other minorities and ethnicities, who have contributed greatly to its vitality. It was an early home of XLNT Foods, the oldest Mexican food brand in the entire US. Today it houses Father Greg Boyle, S.J. and his Homeboy Industries. You may have lunched at their Homegirls Diner in City Hall.

Yet it has been plagued by urban planning ignorance, its significant architectural designs like Aliso Gardens demolished, its is ringed by freeways, its air polluted far beyond sickening levels, redlined by banks and lenders.

For example, Boyle Heights' Aliso Gardens was described as a slum and demolished while The Village Green in Baldwin Hills was placed on the National Register and given a preservation award by the L.A. Conservancy. Yet, the two projects shared architectural styles with like budgets and landscaping,

Despite it's 20th century planners' poor treatment, Boyle Heights has recently been hailed as "the future of American Democracy" by George F. Sanchez in his book: *Boyle Heights: How a Los Angeles Neighborhood Became the Future of American Democracy*. George F. Sanchez. Berkeley: Univ. of Calif. Press, 2021. ISBN 9780520237070

It deserves preservation to retain its authenticity and livability.

The expansion of the Overlay, limiting building heights to two stories, preserving characteristic storefronts, etc., and supporting longtime businesses are highly effective in preserving the cultural character of a neighborhood.

Old Town Newhall is an example of unintended consequences. Its ancient Newhall Hardware, Market, Ice House, and several other businesses had survived nearly a century of earthquakes, a flood, and many recessions but could not survive several years of redesigning downtown Newhall's once-historic Main Street. With no sidewalks, zero street parking, few parking lots, dust and debris, no landscaping and no street lights, stores remained empty for years. Most front elevations were "updated" to eliminate their original character. Trendy restaurants with blocky stucco designs neither elegantly contrast nor enhance the kitschy cowboy character of Old Town's new victorian streetlights, town clock, boardwalks, sidewalks (think "Cowboy Walk of Fame") and parking. Now, the mismatches are reminiscent of "Nightmare Before Christmas."

Please don't repeat Old Town Newhall's mistakes.

Please adopt The L.A. Conservancy's changes to the Boyle Heights CPU.

Regards,

Dotty White

4/20/23, 8:59 AM

City of Los Angeles Mail - Draft Environmental Impact Report for the Boyle Heights Community Plan (EIR)

Valencia, CA



Araceli Sandoval
Chair
Independent Consultant

Manuel Bernal
Vice Chair
Cesar Chavez
Foundation

Daniel Rodriguez
Treasurer
Bank of America

Mercedes Martin
Secretary
Buchalter

Aaron Elster
Member
Buchalter

Arnoldo Ulloa
Member
Edgemoor Infrastructure

Roberto Viramontes
Member
UNITE-LA

Sarah Yun
Member
William and Flora
Hewlett Foundation

April 19, 2023

City of Los Angeles Planning Commission
Los Angeles City Hall
200 N. Spring Street
Los Angeles, CA 90012

Re: Boyle Heights Community Plan, item CPC- 2016-2905-CPU

Dear Commissioners,

Thank you for your consideration of the Boyle Heights Community Plan. I would like to request additional review of the proposed plan to create a more clear zoning for the building called Casa Del Mexicano, which is located at 2900 Calle Pedro Infante, and also on lots 15, 6, 7 of tract 2271 within Boyle heights.

Casa Del Mexicano is a historic building that was originally permitted as a church in 1914. It has a history as both a church and a synagogue. Over the years, it was also known as a dance hall, cultural center, and community center. Programming in the space has included immigration programs, music programs, and English language programs. It was used for posadas and fundraising events. The current use is to for folkloric dance classes for low-income families and cultural performances as well as light artisan manufacturing in the large workshop basement.

The proposed zoning for the three parcels is RX2 which allows a mix of residential and commercial uses.

Please consider allowing uses that match the historic use of the building, which is as a community serving space, such as entertainment venue or light industrial with artistic or artisanal use.

Thank you for your consideration of this request. Please see attached a few pictures of the space.

Monica Mejia
Monica Mejia
President and CEO

2917 East 1st Street, Suite 101 | Los Angeles, CA 90033







Planning CPC <cpc@lacity.org>

Preserve Boyle Heights

G. Smith <baiami@aol.com>

Wed, Apr 19, 2023 at 11:34 AM

To: "cpc@lacity.org" <cpc@lacity.org>

To whom it may concern:

Although Boyle Heights is one of the Black Sheep communities in Los Angeles, it is rich in history, nonetheless.

Boyle Heights is the original "downtown" of Los Angeles and deserves to be brought out of the shadows and into the light.

Perhaps a little T.L.C. as well as respectful and responsible development, will tastefully preserve and update the community.

Updating is not done at the expense of preservation, but compliments it.

Los Angeles has few celebrated historical, architectural jewels, including communities, buildings and districts in use, most are in architectural Heaven; with this known, please take care when determining how to combine preservation with modernization.

Remember one thing, you have only one original and anything put in its place is either a reproduction or something else; once something is gone, it can not be brought back.

Thank you.



Planning CPC <cpc@lacity.org>

Draft Environmental Impact Report for the Boyle Heights Community Plan

Podvalov, Ivan <ipodvalov@recreation.ucla.edu>

Wed, Apr 19, 2023 at 1:03 PM

To: "cpc@lacity.org" <cpc@lacity.org>

Cc: "rsagara@laconservancy.org" <rsagara@laconservancy.org>

Good afternoon,

I would like to extend my support to the letter, which was sent to the City of Los Angeles, Department of planning dated October 11, 2022.

The area of Boyle Hights is specifically of a greater interest to the Russian community of Los Angeles, as it was basically landing grounds to the community of the Russian speaking Angelinos, including the Molokans in the early 20th century. This is the place where its all started.

My name is Ivan Podvalov, and I am working as a swim coach at UCLA and one of the founding members of the Russian Los Angeles Research/Collective.

Thank you for your attention.

Regards, Ivan Podvalov



Planning CPC <cpc@lacity.org>

Draft EIR Comments for the Boyle Heights Community Plan Update, File number ENV-2016-2906-EIR

Patricia Morton <patricia.morton@ucr.edu>

Wed, Apr 19, 2023 at 1:14 PM

To: cpc@lacity.org

Cc: rsagara@laconservancy.org

Dear Commissioners,

I write to strongly support the Los Angeles Conservancy's recommendations for amending the Draft EIR Comments for the Boyle Heights Community Plan Update, File number ENV-2016-2906-EIR, sent October 11, 2022.

These recommendations will help ensure the intent and goals associated with historic resources effectively avoid and mitigate against significant and harmful impacts. In particular, I urge you to adopt a plan that balances the need for new growth and development with retention of existing resources (both people and places) through expanded strategies and tools. Doing more to preserve historic buildings, existing multi-family housing stock, and small businesses can only strengthen the Plan.

Best regards,

Patricia Morton
President, Society of Architectural Historians
Associate Professor of Architectural History
Media and Cultural Studies Department
University of California, Riverside



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

April 18, 2023

cpc@lacity.org

cc: kiran.rishi@lacity.org

City Planning Commission

Room 340, City Hall

200 N. Spring St.,

Los Angeles, CA 90012

Los Angeles City Planning Boyle Heights Community Plan Summer 2022 Draft

To Whom it May Concern,

South Coast Air Quality Management District (South Coast AQMD) appreciates the opportunity to comment on the Boyle Heights Community Plan Summer 2022 Draft (Proposed Project). The Proposed Project aims to promote community health and environmental justice by mitigating the air pollution impacts from industrial land uses and truck traffic within the Boyle Heights community. Assembly Bill 617 (AB 617) was signed into law in July 2017, requiring new community-focused action to reduce emissions and improve public health in communities which are disproportionately burdened by air pollution. Boyle Heights is a part of the East Los Angeles, Boyle Heights, West Commerce (ELABHWC) AB 617 community. The ELABHWC Community Steering Committee (CSC) members have identified air quality priorities and concerns, which the realization of the goals and policies outlined in the Proposed Project can help address.

The goals and policies described in the Proposed Project are consistent with the goals of the Community Emissions Reduction Plan (CERP) for the ELABHWC community. South Coast AQMD developed the CERP under the direction of the CSC, which includes actions for South Coast AQMD to collaborate with land-use agencies to reduce odors and emissions from industrial facilities, to ensure facilities are operating with the necessary air district permits, and to encourage measures that reduce emissions and/or exposures in the community (e.g., warehouse design).

Based on a review of the policy goals described in the Proposed Project, South Coast AQMD comments involve specific measures which are consistent with policies outlined in the Proposed Project or are in addition to those goals and policies mentioned. More detailed comments are provided below.

1. Warehouse Uses

Land Use Policy 12.2 of the Proposed Project promotes the maintenance of land and infrastructure for warehouses in the community, while Land Use Policies 12.8, 23.1, and 23.5 aim to mitigate potential health risks and disruptions from warehouses and industrial facilities and discourages siting of disruptive industries near residential neighborhoods. Furthermore, Land Use Policy 12.8 of the Proposed Project discourages the siting of warehouses without direct access to the Metro Countywide Significant Truck Arterial Network. The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*¹ (AQLU Handbook) recommends avoiding siting sensitive land uses within 1,000 feet of warehouses (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week). South Coast AQMD recommends incorporating the following measures to reduce operational air quality impacts from warehouses:

¹ The California Air Resources Board's (CARB) Air Quality and Land Use Handbook: A Community Health Perspective available at <http://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf>

- Create a buffer zone of at least 1,000 feet which can be office space, employee parking, greenbelt, etc. between the warehouse use and sensitive receptors, where feasible.
- Design warehouse entrances and exits such that trucks do not traverse past sensitive uses, do not queue outside of the facility (e.g., ensure that check-in points are within the site) and that truck traffic within the site is located away from sensitive receptors.
- Establish truck routes are clearly marked and avoid sensitive receptor locations and require that the truck routes be used for truck traffic associated with the warehouse.
- Install “No Truck Idling” and other signage informing of CARB truck regulations.
- Restrict overnight truck parking in residential areas.
- Maximize tree planting and use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.

2. Metal Facilities and Other Industrial Uses

The AQLU Handbook recommends avoiding siting sensitive land uses within 1,000 feet of chrome platers. South Coast AQMD recommends that the Proposed Project prohibit metal processing uses within 1,000 feet of a sensitive land use and that automobile dismantling and other industrial activities which emit fugitive dust, smoke, gas, or fumes are to only occur within a fully enclosed building, consistent with Land Use Policies 23.1 and 23.6.

Additionally, South Coast AQMD recommends that the Proposed Project require the Los Angeles City Planning and/or Building and Safety Departments to consult with South Coast AQMD to conduct permit cross-checks for new or renewal permit applications for industrial uses. Permit cross-checks may help ensure compliance with South Coast AQMD regulations. Examples include requirements for facilities to check with South Coast AQMD to ensure necessary permits are obtained as part of their permit application or renewal, or notifying South Coast AQMD that an industrial facility or auto body shop has received a by-right approval.

3. Signage for Filing Air Quality Complaints

South Coast AQMD recommends including signage requirements for industrial uses subject to South Coast AQMD rules. South Coast AQMD recommends signage include information about how to submit air quality complaints by calling 1-800-CUT-SMOG or online by visiting www.aqmd.gov. An example of signage requirements is in Paragraph (k) of South Coast AQMD Rule 1430 – Control Of Emissions From Metal Grinding Operation At Metal Forging Facilities².

4. Damaged Pavement

Damaged pavement at organic and solid waste facilities may result in odors. South Coast AQMD recommends requirements to repair damaged pavement in receiving areas outside of an enclosure to prevent standing water or waste material from collecting. An example of pavement requirements is in Paragraph (e)(6) of South Coast AQMD Rule 415 – Odors From Rendering Facilities³.

If you have any questions regarding this letter, please contact me at nkrishnamurthy@aqmd.gov.

Sincerely,

Nish Krishnamurthy, Ph.D.

Program Supervisor (Working out of Class), Community Emissions Reduction Program
Diversity, Equity, and Inclusion Office with Community Air Programs

² South Coast AQMD Rule 1430 available at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1430.pdf>

³ South Coast AQMD Rule 415 available at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-415.pdf>