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The following submissions are not integrated or addressed in the Staff Report but have been distributed to the Commission.

Material which does not comply with the submission rules is not distributed to the Commission.

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



Planning APC South LA <apcsouthla@lacity.org>

Request for South L.A. APC Report & Discussion Item for USC Specific Plan

jordan@gideonlaw.net <jordan@gideonlaw.net>

Fri, Jun 16, 2023 at 5:33 PM

To: rafael.fontes@lacity.org, michelle.singh@lacity.org, theodore.iring@lacity.org, sergio.ibarra@lacity.org, apcsouthla@lacity.org

Cc: mayor.helpdesk@lacity.org, chris.thompson@lacity.org, krista.kline@lacity.org, curtis.earnest@lacity.org, xavier.clark@lacity.org, sherilyn.correa@lacity.org, councilmember.harris-dawson@lacity.org, solomon.rivera@lacity.org, belem.lamas@lacity.org, albizel.delvalle@lacity.org

Dear President Orozco and Area Planning Commissioners:

On behalf of USC Forward, please see attached letter asking the South Los Angeles Area Planning Commission ("APC") request the Department of City Planning ("DCP") provide a written report—to be presented during a publicly agendaized item before APC—regarding the status of the University of Southern California ("USC") Park Specific Plan ("Specific Plan").

In short, the South Los Angeles APC may receive from the Planning Director an annual report on the status of all projects within the Specific Plan area. (See Specific Plan § 15.) The last time APC received such a report was in 2016. *Much has changed since 2016, as indicated in the letter sent by Service Employees International Union Local 721 ("Local 721") dated June 16, 2023 (included in the attached USC Forward letter).* For these reasons (discussed further in the attached letter), USC Forward respectfully urges APC to request a comprehensive report from DCP on the status of the Specific Plan that addresses the issues discussed in the Local 721 letter, including:

- 1) Development status under phases 1, 2, and 3 of the Specific Plan;
- 2) Status of USC's commitment of 3,000 new beds within the context of lost beds (e.g., the proposed demolition of Fluor Tower, Trojan, and Marks Residence structures);
- 3) Update on the parking studies and substantiation of proper calculations of FTE students;
- 4) Status of the \$5 million payment to the Affordable Housing Trust Fund (i.e., DA section 3.1.3.1.B);
- 5) An in-depth analysis of USC's enrollment/housing data over the relevant school years and USC campuses, such as:
 - i. An accounting of enrollment at the UPC and HSC campuses within the context of what was anticipated under the Specific Plan EIR and HSC EIR;
 - ii. USC's enrollment figures and percentage of students living on- and off-campus and/or in housing controlled by USC; and
 - iii. Inventory of student housing provided on and off campus controlled by USC between the two campuses and other locations.

Do not hesitate to contact me if you have any questions regarding the attached letter. Lastly, per LAMC sec. 48.08.8 disclosure requirement, please note that this letter is sent by the attorney and law firm on behalf of its client(s) subject to the City's lobbying registration requirement.

Very truly yours,

Jordan R. Sisson, Attorney

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APC Letter.vf.pdf
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June 16, 2023

VIA EMAIL:

South Los Angeles Area Planning Commission, City of Los Angeles

c/o Neverly Ann Hill, Commission Executive Assistant (APCsouthla@lacity.org)

Rafael Fontes, City Planning Associated (rafael.fontes@lacity.org)

Michelle Singh, Senior City Planner (michelle.singh@lacity.org)

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Sergio Ibarra, City Planner (sergio.ibarra@lacity.org)

RE: Request for South L.A. APC Report & Discussion Item for USC Specific Plan

Dear President Orozco and Area Planning Commissioners:

USC Forward respectfully asks the South Los Angeles Area Planning Commission (“APC”) to request from the City of Los Angeles (“City”) Department of City Planning (“DCP”) a written report—to be presented during a publicly agendized item before APC—regarding the status of the University of Southern California (“USC”) Park Specific Plan (“Specific Plan”) approved in 2013 with its associated Development Agreement (“DA”) and Environmental Impact Report (“EIR”).¹ A comprehensive update to the South Los Angeles APC is allowed per section 15 of the Specific Plan and last occurred in 2016. It is well past time for another, which should be done during a public, agendized item before APC.

As a threshold matter, USC Forward is an unincorporated association comprised of a broad coalition of community organizations, students, and union members (including SEIU Local 721 (“Local 721”) and the Greater Page Temple Church of God in Christ) united to make USC a better neighbor and accountable to its surrounding communities. To this end, the association’s recent efforts include advocating for more robust housing protections in the South Los Angeles Community Planning Implementation Overlay and successful participation in the environmental appeal granted by the City Council involving a 98-room/98-bathroom dorm-like Tripalink co-living facility masquerading as a ten small-lot single family home development. (See Council File Nos. 20-1265 & 22-1055, respectively).

Here, the South Los Angeles APC may receive from the Planning Director an annual report on the status of all projects within the Specific Plan area. (See Specific Plan § 15.) Based on documents provided per multiple requests made under the California Public Records Act, the

¹ Both the DA and USC Specific Plan available on City website, <https://planning.lacity.org/plans-policies/overlays/usc>, and Specific Plan EIR available at https://clkrep.lacity.org/online/docs/2012/12-0968_misc_5-27-10.pdf.

last time APC received such a report was in 2016.² Much has changed since 2016, as indicated in the letter sent by Local 721 to DCP dated June 16, 2023, attached hereto as “Attachment 1”. These include the recently issued letter of Director’s Determination (“LODD”) regarding USC’s lack of compliance with certain public benefit obligations under the Specific Plan DA, such as the requirement to provide a full-service grocery store that accepts food vouchers (i.e., “WIC”) or document annual funding for public parks within the nearby USC Specific Plan Nexus area. (See LODD,³ pp. 1, 9-10.) Attachment 1 also highlights several outstanding issues not addressed in the LODD, such as: (i) the erroneous conclusion that COVID-19 prevented USC from satisfying its parks funding requirement (see Attachment 1, pp. 3-6); (ii) significant reductions to USC shuttle bus service since 2016 that may amount to improper removal of traffic mitigation under the California Environmental Quality Act (“CEQA”) (id., at pp. 7-10); and the lack of annual parking studies (required per section 10 of the Specific Plan) that have not been submitted since late-2019, which also amounts to improper removal of CEQA mitigation (id., at p. 13).

The key issue not addressed in the LODD is USC’s aggressive graduate/undergraduate enrollment over the past ten years, which substantially exceeded what was anticipated in the Specific Plans EIR. (Id., at pp. 10-12.) For example, while the 2010 Specific Plan Draft EIR anticipated only a “small annual increase in student enrollment” (i.e., approximately 30,828 students in 2009 to 36,000 students by 2030),⁴ USC’s own enrollment figures show 49,318 total students as of October 2021 (including 42,631 full-time students).⁵ (Id., at p. 11 [Figs. 4 & 5].) The increased enrollment places a greater demand for housing around both USC’s University Park Campus (“UPC”) and Health Science Campus (“HSC”). The imbalance between USC’s enrollment and student housing is further exacerbated by the demolition of several student housing structures located on the UPC campus (i.e., Flour Tower, Trojan & Marks Residence), with no clear replacement plan. Over the last ten years, USC’s aggressive expansion without commensurate housing has led to serious community impacts, such as the demolition and/or conversion of residential homes into dorm-like student housing facilities—resulting in loss of housing stock, displacement, more traffic, noise, and other adverse impacts to the surrounding community.

In sum, much has changed since the last update was given to the South Los Angeles APC in 2016 and, thus, USC Forward respectfully urges APC to request a comprehensive report from DCP on the status of the Specific Plan that addresses the issues discussed in Attachment 1, including:

- 1) Development status under phases 1, 2, and 3 of the Specific Plan;
- 2) Status of USC’s commitment of 3,000 new beds within the context of lost beds (e.g., the proposed demolition of Fluor Tower, Trojan, and Marks Residence structures);
- 3) Update on the parking studies and substantiation of proper calculations of FTE students;

² <https://www.dropbox.com/s/0w52v8sdk23hkur/USC%20SP%20Annual%20Report%203%20%282015-2016%29.pdf?dl=0>.

³ Director’s Determination, Ninth Annual Review, https://www.dropbox.com/s/az5tf0yj2ot8k43/Directors%20Determination_Ninth%20Annual%20Review_2023-04-09%2016-38.pdf?dl=0.

⁴ Specific Plan EIR, supra fn. 1, PDF pp. 884, 929, 1091 2685-2688, 2768-2776, 6497, 6747.

⁵ https://oir.usc.edu/wp-content/uploads/2022/06/CDS_2021-2022_FINAL.pdf.

- 4) Status of the \$5 million payment to the Affordable Housing Trust Fund (i.e., DA section 3.1.3.1.B);
- 5) An in-depth analysis of USC's enrollment/housing data over the relevant school years and USC campuses, such as:
 - i) An accounting of enrollment at the UPC and HSC campuses within the context of what was anticipated under the Specific Plan EIR and HSC EIR;
 - ii) USC's enrollment figures and percentage of students living on- and off-campus and/or in housing controlled by USC; and
 - iii) Inventory of student housing provided on and off campus controlled by USC between the two campuses and other locations.

In conclusion, USC Forward believes it is time for DCP to update the South Los Angeles APC in public during an agenda item on the status of the Specific Plan. The concerns set forth in this letter and Attachment 1 must be addressed and cannot be overlooked as USC seeks yet more discretionary City actions relying on outdated studies and assumptions.⁶ Thank you for your consideration.

Sincerely,

USC FORWARD

Felipe Caceres

Felipe Caceres
(213) 361-7848
felipe.caceres@seiu721.org

ATTACHMENT 1:

SEIU Local 721 Letter (6/16/23) (including Exhibits A – F attached thereto)

CC: (via email)

Mayor's Office:

Hon. Mayor Karen Bass
Chris Thompson, Chief of Staff
Krista Kline, Dir. of Leg. Affairs

Council District 8

Hon. Marqueece Harris-Dawson
Solomon Rivera, Chief of Staff
Belem Lamas, Senior Leg. Deputy
Albizael Del Valle, Econ. Dev. Deputy

Council District 9

Curtis Earnest, Chief of Staff
Xavier Clark, Planning Assistant
Sherilyn Correa, Dir. of Planning
and Econ. Dev.

⁶ Such as a new Soccer/Lacrosse stadium located at the UPC campus relying on an addendum to the Specific Plan EIR (i.e., DCP Case No. CPC-2022-5429) and a new 7-story research lab project on the HSC campus relying on a second addendum to a 2005/2006 HSC EIR (i.e., DCP Case No. CPC-2022-9266-CU).

ATTACHMENT 1



SERVICE EMPLOYEES
INTERNATIONAL UNION, CTW, CLC

OFFICERS

David Green
PRESIDENT &
EXECUTIVE DIRECTOR

Simboa Wright
VICE PRESIDENT

Lillian Cabral
SECRETARY

Adolfo Granados
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Charlotte Ramos
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Maria Sneed
Tara Stoddart

RETIREE MEMBER
Charley Mims

<http://www.seiu721.org>

June 16, 2023

VIA EMAIL

Rafael Fontes, City Planning Associated (rafael.fontes@lacity.org)
Michelle Singh, Senior City Planner (michelle.singh@lacity.org)
Theodor L. Irving, Principal Planner (theodore.irving@lacity.org)
Sergio Ibarra, City Planner (sergio.ibarra@lacity.org)
Department of City Planning, City of Los Angeles

**RE: REQUEST FOR SOUTH LA APC REPORT & PUBLIC HEARING FOR USC
SPECIFIC PLAN COMPLIANCE**

Dear Mr. Fontes and Department of City Planning Staff:

Service Employees International Union Local 721 ("Local 721") writes to the City of Los Angeles ("City") Department of City Planning ("DCP") in response to the recent letter of Director's Determination ("LODD")¹ regarding the Ninth Annual review of the University of Southern California ("USC") Development Agreement ("DA") associated with the USC Park Campus Specific Plan ("Specific Plan").²

SEIU Local 721 represents more than 98,000 members throughout Southern California, including over 9,000 members who work for the City of Los Angeles. Local 721 is also a member of USC Forward, an unincorporated association comprised of a broad coalition of community organizations, students, and union members united to make the University of Southern California a better neighbor and more accountable for its impacts on surrounding neighborhoods.

In short, Local 721 agrees with the Director's Determination that USC has *not complied* with certain terms and conditions of the DA, specifically with regard to the full-service grocery store that accepts food vouchers commonly referred to as "WIC" (*infra* section 1) and the annual public parks payment within the specified USC Specific Plan Nexus area. (See LODD, pp. 1, 9-10.) The lack of documented compliance has been brought to your attention in our numerous prior comment letters, emails, and communications sent to DCP over the past two years. We thank DCP staff for their consideration.

/ / /

¹ Director's Determination, Ninth Annual Review, https://www.dropbox.com/s/az5tf0yj2ot8k43/Directors%20Determination_Ninth%20Annual%20Review_2023-04-09%2016-38.pdf?dl=0.

² Both the DA and USC Specific Plan available on City website, <https://planning.lacity.org/plans-policies/overlays/usc>.

However, there appear to be several outstanding issues not addressed in the LODD, including the erroneous conclusion that COVID-19 prevented USC from satisfying its parks funding requirement, as well as the significant improper reduction to the USC shuttle bus service. Additionally, it is far too long since DCP provided the South Los Angeles Area Planning Commission (“**APC**”) with an update³ on activities under the 2013 Specific Plan Environmental Impact Report (“**EIR**”), such as whether USC’s aggressive graduate/undergraduate enrollment has substantially exceeded the Specific Plan’s EIR model. It is time for an update in public to the APC on all these topics, including the fact that USC is currently demolishing several on-campus student housing structures (i.e., Fluor Tower, Trojan & Marks Residence) without a clear replacement plan with required annual parking studies tied to specific enrollment data. All this impacts Local 721’s members, USC Forward and the community because the increase of USC’s enrollment, absent commensurate on-campus housing, has led to the demolition and/or conversion of residential homes into dorm-like student housing projects—resulting in loss of housing stock, displacement, more traffic, noise, and other adverse impacts.

We also wish to note that under the California Environmental Quality Act (“**CEQA**”), USC’s enrollment/housing imbalance constitutes a substantial change in circumstance to both USC’s University Park Campus (“**UPC**”) and Health Science Campus (“**HSC**”). As such, it is improper for USC to use an addendum to the 2013 Specific Plan EIR for the newly proposed Women’s Soccer Stadium at the UPC campus or an addendum to the 2005/2006 HSC EIR for the newly proposed seven-story research building at the HSC campus. USC planning needs a major, public update that does not rely on outdated decade-old assumptions. APC should hold a hearing.

In sum, as discussed in detail in this letter, and based on the LODD, documents provided by the City pursuant to an updated request for documents under the California Public Records Act (“**CPRA**”), and the information/comments attached hereto as “**Exhibit A**” through “**Exhibit F**,” Local 721 requests the City:

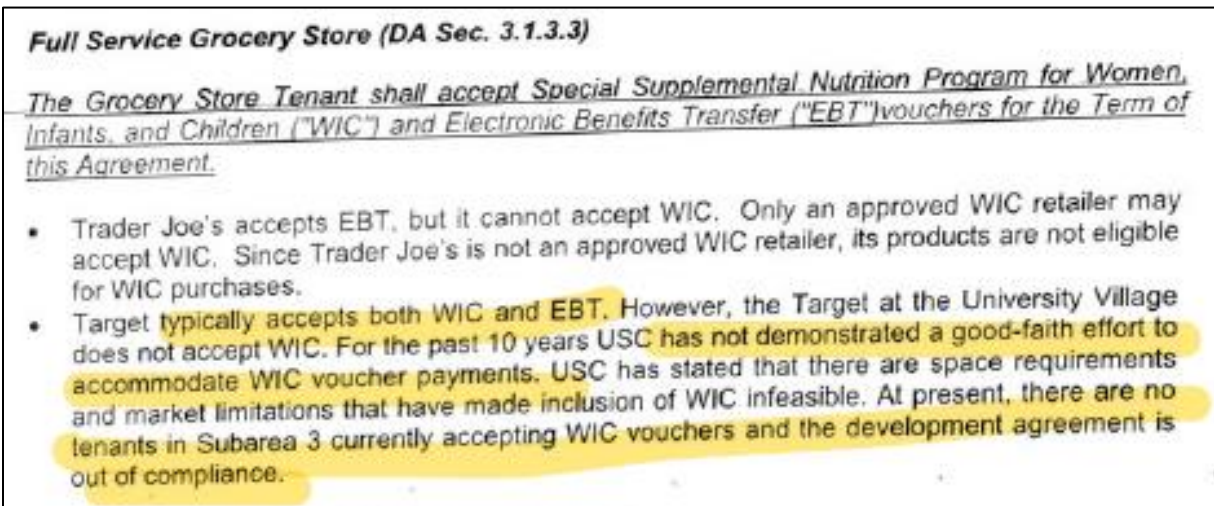
- Remedy the non-compliance with the WIC voucher requirement by requiring Target to accept WIC vouchers, like it does at other locations.
- Require all USC’s payments to the City Department of Parks and Recreation for each year USC fails to show funding went to public parks within the USC Specific Plan Nexus Area.
- Find USC non-compliance with its Expanded Shuttle Service requirement (DA § 3.1.3.19) and order the remedy of restoring several routes that have been removed in recent years (i.e., Routes A, B, LA Live [discussed further below]) and take further steps to properly monitor changes made to routes in the future.
- Prepare a written report—to be presented during a publicly agendized item before the South Los Angeles APC—that provides a comprehensive update to the status of the Specific Plan area, including enrollment/housing data as compared to what was

³ Under section 15 of the Specific Plan, the South Los Angeles APC may receive from the Planning Director an annual report on the status of all projects within the Specific Plan area. Based on CPRA-provided documents, the last time APC received such a report was in 2016.

anticipated in the 2013 Specific Plan EIR, as well as the other requested information (*infra* section 4d).

1. REMEDY FOR NON-COMPLIANCE WITH WIC VOUCHER REQUIREMENT

DCP found that USC has not complied with the DA § 3.1.3.3 requirement that the full-service grocery store accepts both WIC and EBT food vouchers. (See LODD, p. 9; see figure below.) Local 721 urges the City to compel “specific performance,” whether by Target (like at other Target locations), Trader Joe’s, or an alternative grocery store that accepts WIC. Additionally, for the “past 10 years USC has not demonstrated a good-faith effort to accommodate WIC voucher payments.” (LODD, p. 9; see also excerpt below.) This may be remedied by including additional community benefits, which should be codified in a modification to the DA after holding a public hearing before the City Council. (See DA §§ 4.7, 5.1.4.) Furthermore, Local 721 requests to be placed on the notification list in the event USC appeals the LODD and/or a public hearing is held on the matter.



2. NO ACTUAL ENFORCED DELAY TO EXCUSE SERIAL NON-COMPLIANCE WITH PARKS FUNDING

Because the Department of Parks and Recreation (“**Parks & Rec.**”) has not received the required payment, DCP found USC is non-compliant with its DA § 3.1.3.11 park funding requirement. (See LODD, pp. 9-10; see figure below.) However, citing COVID-19, the LODD suggests that this non-compliance is excused as “enforced delay” per section 6.4 of the DA. (Id.) This is incorrect given that the DA clearly indicates that enforced delay merely “extend[s] [the] period of time equal to the number of days during which [USC] is actually prevented from, or is unreasonably interfered with, the doing or completion of such act, matter or thing because of causes beyond the [its] reasonable control” like wars, riots, and other acts of God. (DA, p. 29.) While USC is not responsible for COVID-19, there is no indication that COVID-19 prevented

USC's ability to write a check to Parks & Rec.⁴ It simply stretches credulity and the caselaw to suggest enforced delay applies here.⁵

Programming at Public Parks (DA Sec. 3.1.3.11)

The Property Owner will expend, or contribute resources of equivalent value of, a minimum of \$10,000 annually for the Term of the Development Agreement.

- **Women's History Month 2021:**
USC invited Girls Play Los Angeles to campus for a panel with current female student athletes to hear about the importance of women empowerment. Additionally, panelists shared their journey to playing sports in college in addition to encouraging GPLA youth to be courageous and confident young girls in their everyday lives. Troy Camp provides a week -long mountain summer camp, followed by long term mentorship to students in South Los Angeles to foster personal and academic growth and facilitate high school graduation and post- secondary matriculation

* * *

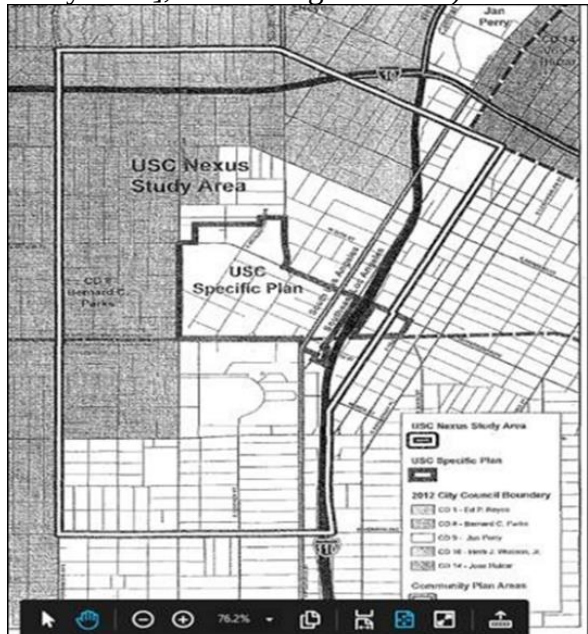
- **Department of Recreation and Parks Payment: \$10,000**
A minimum \$10,000 payment has not yet been made to the Department of Recreation and Parks to fund parks programming within the ninth reporting period.

For 2021-2022, The Public Parks programming partnership have been severely limited by COVID 19 and associated restrictions, which constitute enforced delay under DA Section 6.4.

Additionally, the LODD does not address seemingly years of non-compliance in payments to Parks & Rec, which failure was well documented in our prior comment letters that cite documents provided by the City pursuant to Local 721's multiple CPRA requests. As summarized in the table on the following pages, there are numerous flaws with USC's documentation of purported compliance, starting in 2015 (i.e., 3rd Annual Review Period) and continuing through the present (i.e., 9th Annual Review Period). Local 721 urges the City to compel USC to: (a) provide documentation that funding/programs were paid/provided for public parks within the USC Specific Plan Nexus Area (discussed below); (b) pay the minimum due for each Annual Review period where adequate documentation is lacking; and (c) consider a modification to the DA that ensures future compliance.

⁴ See e.g., City of Los Angeles Emergency Authority (3/21/20), https://lachamber.com/clientuploads/pdf/2020/2020-03-21_MEG_Emergency_Order_-_Toll_Land_Use_Timelines.pdf; see also Mayor Karen Bass (posted 12/16/22) Executive Directive No. 1, <https://mayor.lacity.gov/news/mayor-bass-signs-executive-directive-dramatically-accelerate-and-lower-cost-affordable-housing>; Governor Newsom to End the COVID-19 State of Emergency (10/17/22) ("... COVID-19 State of Emergency will end on February 28, 2023..."), <https://www.gov.ca.gov/2022/10/17/governor-newsom-to-end-the-covid-19-state-of-emergency/#:~:text=SACRAMENTO%20%E2%80%93%20Today%2C%20Governor%20Gavin%20Newsom,used%20to%20combat%20COVID%2D19.>

⁵ See e.g., *County of Monterey v. Bosler* (2020) 57 Cal.App.5th 466, 473 (former redevelopment agency accepted "enforced delay" to excuse developer's \$1.5 million obligation in 2008 during the Great Recession); *West Pueblo Partners, LLC v. Stone Brewing Co., LLC* (Apr. 3, 2023, No. A164022) ___ Cal.App.5th ___ (2023 Cal. App. LEXIS 328, at *1) (held force majeure provision not applicable where commercial tenant had financial resources to pay rent during the period of COVID 19).

USC Purported Compliance		Reasons for Non-Compliance	
1 st Annual Review (2013-2014)			
USC has awarded \$36,100 to the Kids in Sports (KIS) South LA Sports Club for the 2013-2014 fiscal year.			
2 nd Annual Review (2014-2015)			
USC has awarded \$18,525 to the Kids in Sports (KIS) South LA Sports Club for the 2014-2015 fiscal year.			
3 rd Annual Review (2015-2016)			
Neither a Letter of Director Determination nor any other documentation has been provided showing any payments were made.			
4 th Annual Review (2016-2017)			
Neither a Letter of Director Determination nor any other documentation has been provided showing any payments were made.			
5 th Annual Review (2017-2018)			
USC Thornton JazzReach: \$37,900 Community Partner: Foshay Learning Center (Lisa Beebe) University Partner: USC Thornton School of Music (Susan Helfter) Website: http://music.usc.edu/departments/scholarly-and-professional-studies/outreach/schools/ JazzReach is a stimulating jazz enrichment program that provides weekly group/individual instruction and in-school concerts for students in the USC community, while also creating opportunities for USC Thornton students to gain teaching and administrative skills. JazzReach provides high-quality, low-cost jazz programming to more than 2,300 students and families from USC neighborhood schools, with almost 70 USC Thornton students serving as teachers. More than 260 neighborhood students participate in weekly classes and an additional 2,100 students and/or families experience concerts performed by USC Thornton jazz ensembles and JazzReach ensembles. USC Troy Camp: \$58,430 Community Partner: Lenicia B. Weemes Elementary School (Shirley Crout) University Partner: USC Campus Activities (Jennifer Perdomo) Website: www.troycamp.org USC Troy Camp is a youth development organization that enriches the lives of children, broadening their horizons through long-term mentoring experiences with USC undergraduate students. USC students operate the program, which begins in May with a weeklong summer camp at Idyllwild Pines in Idyllwild, CA, with oversight from a small advisory board. The 210 children who attend the annual camp are third through fifth grade students from 19 partner schools in South Los Angeles. Counselors facilitate character development through daily programs such as swimming, horseback riding, hiking, arts, and athletics. The mentoring relationship between counselors and campers continues after camp with a series of monthly Kids Events, including trips to museums and a USC football game. Throughout the school year, Troy Camp also hosts after-school tutoring and enrichment opportunities for students. To date, Troy Camp has served more than 11,000 children in the south Los Angeles community.		No indication that disbursements to the USC Thornton JazzReach and USC Troy Camp were for “programs <u>at public parks within the Nexus study area</u>” as required under section 3.1.3.11 of the DA (emphasis added). (See Exhibit C of the DA [map of USC Nexus Study Area]; see also figure below). 	
6 th Annual Review (2018-2019)			
USC has awarded \$18,525 to the Kids in Sports (KIS) South LA Sports Club for the 2014-2015 fiscal year.		USC relies on three-year-old disbursements made to Kids in Sports (“KIS”) program during the 2014-2015 period.	

Combined 7 th (2019-2020) and 8 th (2020-2021) Annual Review ⁶	
<i>Programming at Public Parks (DA Sec. 3.1.3.11)</i> The Property Owner will expend, or contribute resources of equivalent value of, a minimum of \$10,000 annually for the Term of the Development Agreement. (See Attachment C 2020 Compliance Letter) Troy Camp Program 2019-2020: \$52,590 USC /Troy Camp provides a week -long mountain summer camp, followed by long term mentorship to students in South Los Angeles to foster personal and academic growth and facilitate high school graduation and post- secondary matriculation Trojan Kids Camp Program 2019-2020: \$27,000 Trojan Kids Camp provides sports, education, and nutrition instruction to participating youth, which targets underserved youths 9-15. For 2020-2021, The Public Parks programming partnership have been severely limited by COVID 19 and associated restrictions, which constitute enforced delay under DA Section 6.4.	No indication that USC Troy Camp, Thornton Outreach Program, Mission Science, or Schools Facilitators funding were for “programs at public parks within the Nexus study area” (discussed supra for 5th Annual Review). Additionally, no indication of enforced delay whereby COVID-19 prevented USC’s ability to pay Parks & Rec. (discussed supra for 9th Annual Review).
USC Thornton Outreach Program (“TOP”): \$26,540 USC’s TOP is a diverse and comprehensive music education program that seeks to provide low or no-cost, high-quality music-learning opportunities to underserved students in the USC community. At the same time, it affords USC Thornton students the opportunity to develop teaching, mentoring, and community engagement skills. Mission Science: \$28,510 Mission Science is an afterschool program that exposes 3rd-5th graders to hands-on, inquiry-based science and engineering activities. Taught by USC STEM majors, the curriculum is designed to build confidence in STEM studies and students’ ability to succeed. USC Family of Schools Facilitators: \$62,660. The USC Family of Schools (FOS) offers schools in the USC University Park and Health Sciences campus neighborhoods access to free extracurricular programming. The FOS system continually works to provide additional resources and inform teachers, staff, administrators and more about the programming available in their area. It also serves to recruit students to participate in a variety of programs.	

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⁶ LODD (2/18/22), https://www.dropbox.com/s/nhh49ykau8jqbg5/exh.%20c_2022-03-22%2020-27.pdf?dl=0.

3. SINCE PURPORTED COMPLIANCE IN 2016, EXTENSIVE MAJOR SHUTTLE SERVICE HAS IMPROPERLY BEEN REMOVED IN VIOLATION OF THE DA

According to the LODD, USC complied with DA § 3.1.3.19's expanded shuttle service because "LADOT determined the University's expanded tram service satisfies this requirement." (LODD, p. 8.) Based on various documents provided pursuant to a CPRA request, this determination was apparently made sometime in 2016 based upon five improvements outlined in the CPRA-provided document titled "DA Section 3.1.3.19 Expanded Shuttle Service" dated March 4, 2016 (attached hereto as "**Exhibit A**"), including those listed below:

1. *"Increased capacity on the Union Station and Health Science Campus routes by adding additional stops at Union Station and Soto building and increasing the size of the vehicle, adding 20 passengers per departure.*
2. *Added weekend service to Union Station and Health Science Campus.*
3. *Increased capacity to City Center by extending service to 8:20pm and increasing the size of the vehicle, adding 22 passengers per departure.*
4. *Increased capacity to Marina Del Rey by increasing the size of the vehicle, adding 22 passengers per departure.*
5. *Resumed shuttle service to LA Live."*

However, there has been an extensive major reduction in shuttle services since 2016 when comparing USC's online bus schedules from Fall 2014 (i.e., shortly after the DA was first approved), Spring 2016 (i.e., when LADOT purportedly determined USC's expanded tram service satisfied DA requirement), and the most recent Spring 2023 schedule (see "**Exhibit B**" attached hereto). First, Route A, Route B, and L.A. Live service is entirely missing from the current schedule and has apparently been eliminated since the Spring 2016 and Fall 2014 schedules. (See Exh. B [highlighted in blue].) This amounts to improper removal of CEQA mitigation.^{7, 8}

Second, multiple services have seen a reduction in hours since Spring 2016 (id., highlighted in red), such as: (i) USC Tower/City Center/AT&T to UPC starting 40 minutes later in the morning and ending three hours early in the evening; (ii) Parking Center ending 4 hours early in the evening; (iii) Route C, while starting 10 minutes earlier in the morning ends nearly five hours earlier in the evening; and (iv) UPC to USC Tower/City Center/AT&T starts 30 minutes later in the morning and ends 25 minutes earlier in the evenings.

/ / /

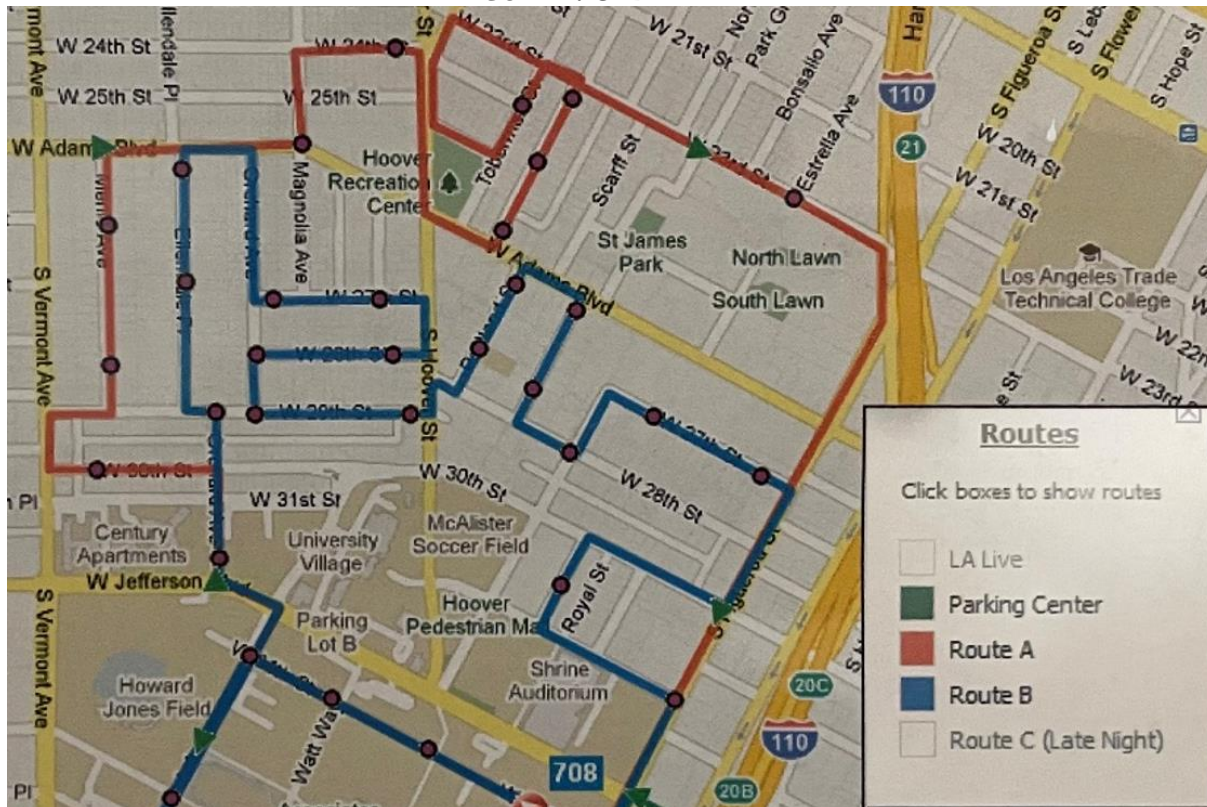
⁷ Under CEQA, adopted mitigation measures cannot be removed absent substantial evidence demonstrating mitigation is no longer needed. (See e.g., *Katzeff v. Dept. of Forestry & Fire Protection* (2010) 181 Cal.App.4th 601, 614; *Lincoln Place Tenants Ass'n v. City of Los Angeles* (2005) 130 Cal.App.4th 1491, 1508.)

⁸ The Specific Plan EIR included several traffic mitigation measures, including but not limited measure K.1-1, Transportation Demand Management Program that called for various measures, such as "Tram/Shuttle System Modifications" and "Shuttle To/From LA Live and USC." (Final EIR, PDF pp. 5174 – 5175 [pp. IV-46 – IV-47], https://clkrep.lacity.org/online/docs/2012/12-0968_misc_5-27-10.pdf.)

Third, the Marina Del Rey service (id., [highlighted green]), which is roughly 10 miles from the campus, does not fall within the plain meaning of the DA to “provide connectivity between the surrounding community” or provide funding for LADOT “Dash Services in the local area.” (DA § 3.1.3.19 [emphasis added].)

Fourth, the removal of Routes A and B effectively disconnected the northeastern portions of the University Park Campus. This is evident when comparing the old USC tram map posted at USC’s Parking Center to the current tram map online (see “**Exhibit C**” attached hereto). (Compare Fig. 1 with Fig. 2 below). Also evident is that USC has never provided a shuttle stop at the University Village. Under USC’s current services (i.e., Route C, Parking Center, USC Tower), not a single shuttle stop is co-located with any of the roughly 12 bus stops adjacent to the USC Village area (i.e., bounded by Hoover St., McClintock Ave., and Jefferson Blvd.). (See Fig. 3 below.)

FIGURE 1: OLD TRAM MAP⁹



⁹ Posted on bulletin board located at the waiting room at the USC Parking Center on around April 22, 2023. However, according to discussions between Local 721 member and shuttle drivers, Routes A & B are no longer provided.

FIGURE 2: CURRENT TRAMP MAP (MAY 2023)

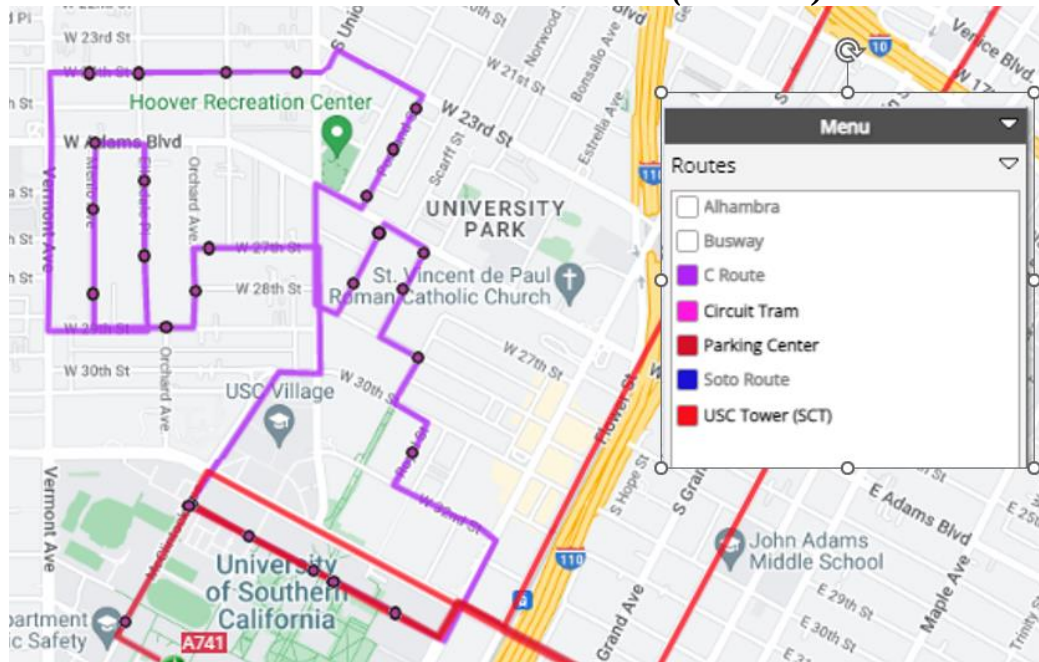
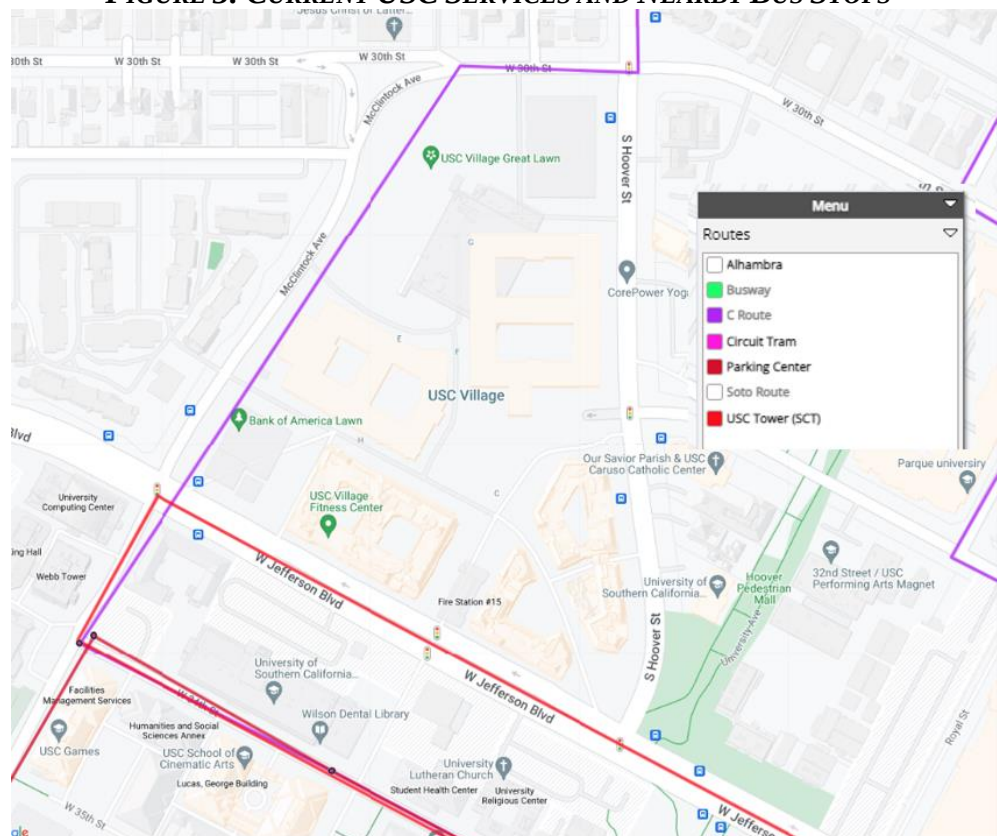


FIGURE 3: CURRENT USC SERVICES AND NEARBY BUS STOPS¹⁰



¹⁰ <https://www.uscbuses.com/map>.

In sum, USC has removed significant services since 2016, when it purportedly satisfied the DA's Section 3.1.3.19 Expanded Shuttle Service requirement. It now fails to connect USC's tram services to public transit stops near USC Village. This is a major concern to Local 21 and USC Forward members because the community is excluded from accessing by bus the grocery store and other public amenities, as well because it also eliminates traffic mitigation measures intended to alleviate adverse impacts suffered by the community. Local 721 urges the City to compel USC's compliance by: (a) restoring Routes A, B, and to L.A. Live; (b) require annual reporting of routes provided; and (c) require prior City approval before USC may remove and/or modify routes established in satisfaction of DA Section 3.1.3.19.

4. THE DIRECTOR SHOULD PROVIDE A PUBLIC UPDATE TO THE SOUTH LA APC ON STATUS OF THE UPC SPECIFIC PLAN AND ADDRESS USC'S AGGRESSIVE ENROLLMENT, DEMOLITION OF ON-CAMPUS HOUSING, AND OTHER SIGNIFICANT CHANGES AT USC

Under section 15 of the Specific Plan, the South Los Angeles APC may receive from the Planning Director an annual report on the status of all projects within the Specific Plan area. Based on CPRA-provided documents, the last time APC received such a report was in 2016.¹¹ It is due time for another.

a) The APC should learn that USC's enrollment has exceeded what it promised and studied in 2010, and USC is not doing enough to address its growth.¹²

In 2010, the Specific Plan EIR anticipated only a "small annual increase in student enrollment" from approximately 30,828 students (2009) to 36,000 students (2030).¹³ However, based on USC's enrollment figures disclosed in its most recent 2021 Common Data Set ("CDS"), USC had 49,318 total students as of October 15, 2021 (in yellow)—42,631 of which were full-time students (in green).¹⁴ (See Fig. 4 following page.) *This is a massive unplanned-for increase that has significant community impacts such as more traffic, more noise, and the conversion of residential communities and homes into dorm-like student housing facilities.*

To put this enormous unplanned enrollment growth in context, Figure 5 in the chart on the following page—based on USC's own enrollment figures listed in its CDS and annual financial reports (summarized in "Exhibit D" attached hereto)—reflects the anticipated growth in total enrollment from the USC Specific Plan (grey line) to the actual growth in total enrollment (blue line) and the trajectory of USC enrollment if the current rate of growth

¹¹ <https://www.dropbox.com/s/0w52v8sdk23hkur/USC%20SP%20Annual%20Report%203%20%282015-2016%29.pdf?dl=0>.

¹² See also USC Annenberg Media (9/14/21) Freshmen, sophomores struggle to get on-campus housing ("‘It was kind of a crazy process,’ said sophomore Kaelyn Moses, a global health major living in the USC Village. ‘Honestly, the housing application was really confusing.’"), <https://www.uscannenbergmedia.com/2021/09/14/freshmen-sophomores-struggle-to-get-on-campus-housing/>.

¹³ DEIR, Appendix J, Employment, Housing and Population Impacts Assessment, PDF p. 29, https://planning.lacity.org/eir/USC/Feir/files/USC%20Appendix%20J%20-%20Emp-Hsg-Pop%20Tech%20Report%205_13_10.pdf; DEIR, Appendix C-2, Historic Resources Evaluation University Park Campus, PDF p. 118, 156 <https://planning.lacity.org/eir/USC/Feir/files/USC%20Appendix%20C-2%20Historic%20Resources%20Evaluation%20University%20Pa.pdf>.

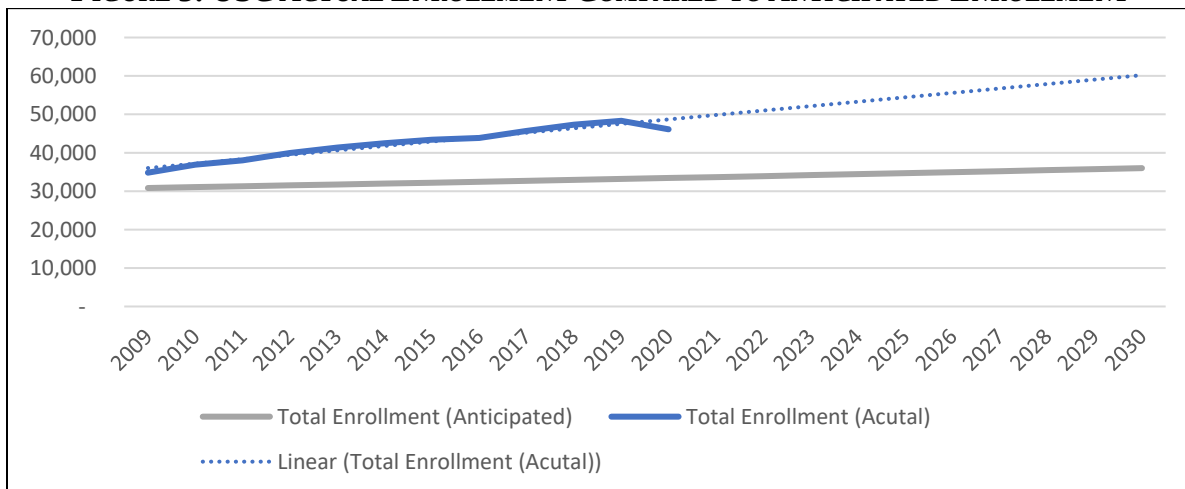
¹⁴ https://oir.usc.edu/wp-content/uploads/2022/06/CDS_2021-2022_FINAL.pdf.

continues through 2030 (blue dashed line). Clearly, USC enrollment has grown well beyond what was anticipated for 2023, much less where enrollment will be in 2030 at current rates, which has put a substantial increase in demand for housing near the University Park Campus (further compounded by the removal of existing on-campus student housing, discussed below).

FIGURE 4: USC's 2021-2022 CDS REPORT

B. ENROLLMENT AND PERSISTENCE				
B1 Institutional Enrollment - Men and Women				
Provide numbers of students for each of the following categories as of the institution's official fall reporting date or as of October 15, 2021 .				
• Note: Report students formerly designated as "first professional" in the graduate cells. For information on reporting study abroad students please see this link .				
	FULL-TIME		PART-TIME	
	Men	Women	Men	Women
Undergraduates				
Degree-seeking, first-time freshmen	1,736	1,928	1	3
Other first-year, degree-seeking	655	688	1	9
All other degree-seeking	7,311	7,792	270	225
Total degree-seeking	9,702	10,408	272	237
All other undergraduates enrolled in credit courses	54	42	46	29
Total undergraduates	9,756	10,450	318	266
Graduate				
Degree-seeking, first-time	3,763	4,430	510	744
All other degree-seeking	5,940	7,818	2,051	2,469
All other graduates enrolled in credit courses	211	263	158	171
Total graduate	9,914	12,511	2,719	3,384
Total all students	19,670	22,961	3,037	3,650
Total all undergraduates	20,790			
Total all graduate	28,528			
GRAND TOTAL ALL STUDENTS	49,318			

FIGURE 5: USC ACTUAL ENROLLMENT COMPARED TO ANTICIPATED ENROLLMENT



b) USC is also demolishing several existing on-campus student housing facilities with no public plans to replace them.

USC has already started demolition of the 11-story Fluor Tower dormitory, located near the corner of Jefferson Blvd. and Orchard Avenue,¹⁵ which previously served as student housing, including a special interest Latinx community (i.e., El Sol y La Luna) whose freshman members lived on the sixth floor.¹⁶ So too, USC is starting the demolition of the Trojan Residence and Marks Hall structures located near the corner of Figueroa Street and Childs Way.¹⁷ (See Fig. 6 below.) Together, these are hundreds of units of student housing being removed at the same time that USC has significantly increased both its graduate and undergraduate enrollment exceeding prior estimates (discussed supra). This begs the question of how many USC-owned/affiliated units are being provided to undergraduate and graduate students at the UPC campuses and whether the current situation complies with what was studied, expected, and promised when the Specific Plan EIR and DA were approved by the City in 2013 (a question equally relevant to the HSC campus, discussed below).

FIGURE 6: DEMOLITION FENCING AROUND TROJAN AND MARKS RESIDENCE STUDENT HOUSING



¹⁵ Department of Building and Safety Permit Application Nos. 21019-10000-04896 and 20019-10000-05328, https://ladbsdoc.lacity.org/IDISPublic_Records/idis/ImageMain.aspx?DocIds={EBBE1CD4-6FD6-4212-9A93-45748EB09FB3},.

¹⁶ Daily Trojan, <https://dailytrojan.com/2022/02/14/fluor-tower-vacant-since-march-2020-to-be-demolished/>.

¹⁷ LADBS Permit No. 21019-10000-05328, https://ladbsdoc.lacity.org/IDISPublic_Records/idis/ImageMain.aspx?DocIds={EBBE1CD4-6FD6-4212-9A93-45748EB09FB3},; see also <https://www.uscannenbergmedia.com/2022/04/12/ground-zero-performance-cafe-set-for-demolishment/>; https://www.reddit.com/r/USC/comments/10juto1/trojan_hall_and_marks_hall_being_demolished/.

c) There appear to be missing annual parking studies since 2019.

Section 10 of the Specific Plan requires USC to provide an annual parking study that “establishes the University population each year” and ensures adequate parking in accordance with the parking requirements, including but not limited to those Full-Time Equivalent (“FTE”) students residing within the nearby South LA area and elsewhere. (See also § 4 Definitions.) However, this office has received only five parking studies dated between November 2014 and December 2019—all titled “J1229 Parking Monitoring Report.”¹⁸ There has been no documentation showing any parking reports provided from 2020 to the present. Notwithstanding COVID, the time has come for USC to provide these parking reports. So too, the updated reports should provide more clarity on their calculations of FTE students within the South LA area and beyond. Furthermore, the failure to provide annual reports also amounts to improper removal of CEQA mitigation.¹⁹ These parking studies are also relevant to the enrollment and student housing issues discussed above.

d) USC is considering new discretionary actions (i.e., Women’s Sports Stadium and USC Medical Center projects) relying on old, outdated analysis in the face of significant changed circumstances.

When acting on new discretionary approvals, the City has the ability to require new CEQA analysis if there have been substantial changes in circumstances or new information of substantial importance since the Specific Plan EIR was approved. (See DA §§ 3.2.4 & 3.2.5.) Currently, USC is proposing a new Soccer/Lacrosse stadium relying on an addendum to the Specific Plan EIR (i.e., DCP Case No. CPC-2022-5429). As discussed by Local 721 in its prior comment letters on the stadium project (see “**Exhibit E**” attached hereto), an addendum is not appropriate because the old Specific Plan enrollment/housing assumptions are entirely outdated given USC’s aggressive and unilateral expansion in enrollment. The old Specific Plan analysis is no longer good – especially for approvals not studied or contemplated, like the Soccer stadium project.

Similarly, USC is proposing a new 7-story research lab project on its Health Science Campus (i.e., DCP Case No. CPC-2022-9266-CU). As discussed in Local 721’s prior letters on that project (see “**Exhibit F**” attached hereto), USC is utilizing a second addendum to a very old 2005/2006 EIR that already was subject to a first addendum in 2012 for various improvements to the HSC Campus. Despite the EIR and first addendum assuming graduate enrollment would not

¹⁸ See (11/17/14), <https://www.dropbox.com/s/2gaojlaicxg9z/J1229%20Parking%20Monitoring%20Report%20-%20October%202014%20%282%29.pdf?dl=0>, (2/9/17), <https://www.dropbox.com/s/8q9r0sfl4fvws9u/J1229%20Parking%20Monitoring%20Report%20-%20October%202016.pdf?dl=0>, (12/11/17), <https://www.dropbox.com/s/8ptut34o7nwzh88/J1229%20Parking%20Monitoring%20Report%20-%202017.pdf?dl=0>, (11/28/18), <https://www.dropbox.com/s/fkvqjgn1pl73bfa/J1229%20Parking%20Monitoring%20Report%20-%202018%20%28Attachment%20A%29.pdf?dl=0>, and (12/10/19), <https://www.dropbox.com/s/mbxmvks0iylp3hv/J1229%20Parking%20Monitoring%20Report%20-%202019%20%28Attachment%20A%29.pdf?dl=0>.

¹⁹ Adopted CEQA mitigation measures cannot be removed absent substantial evidence demonstrating mitigation is no longer needed. (Supra fn. 7.) The Specific Plan EIR included mitigation measure K.2-1 calling for the annual parking monitoring reports. (See Final EIR, supra fn. 8, PDF p. 5180 [p. IV-52].)

significantly increase due to those improvements, USC has seen a significant jump in graduate enrollment—both in total enrollment and as a percentage of USC’s overall enrollment. For example, from June 1999 to October 2021, USC’s graduate enrollment increased from 13,186 (or 46% of total enrollment) to 28,528 (or 58% of the total). Similarly, total faculty and staff also increased from 12,224 to 16,623 between 2005 and 2012. Like the Specific Plan EIR, the HSC EIR has become outdated because of USC’s unilateral expansion in enrollment.

USC’s apparent aggressive expansion over the last ten years has serious community impacts in many ways (e.g., conversion of housing into student dormitories/co-living facilities). Moreover, it undermines the fundamental assumptions of not only the Specific Plan EIR but also the HSC EIR—just like the case of *Save Berkeley’s Neighborhoods v. Regents of University of California*, (2020) 51 Cal.App.5th 226, where the university made several discretionary decisions leading to increased enrollment without analyzing and mitigating new impacts. (Id., at p. 237.)

Much has changed since the last APC report was provided in 2016 and, thus, Local 721 urges the Planning Director to provide a Specific Plan report to the South LA APC during a public hearing, that addresses the above-mentioned issues, including but not limited to:

- Development status under phases 1, 2, and 3 of the Specific Plan;
- Status of USC’s commitment of 3,000 new beds within the context of lost beds (e.g., the proposed demolition of Fluor Tower, Trojan, and Marks Residence structures);
- Update on the parking studies and substantiation of proper calculations of FTE students;
- Status of the \$5 million payment to the Affordable Housing Trust Fund (i.e., DA section 3.1.3.1.B); and
- An in-depth analysis of USC’s enrollment/housing data over the relevant school years and USC campuses, such as:
 - i. An accounting of enrollment at the UPC and HSC campuses within the context of what was anticipated under the Specific Plan EIR and HSC EIR;
 - ii. USC’s enrollment figures and percentage of students living on- and off-campus and/or in housing controlled by USC;
 - iii. Inventory of student housing provided on and off campus controlled by USC between the two campuses and other locations;
 - iv. Information about the location of students living arrangements (e.g., on/off-campus, within one mile and other useful increments, etc.);
 - v. Other relevant student housing data provided by USC to the U.S. Census; and
 - vi. Other factors that influence USC’s enrollment levels and impacts on the surrounding community, such as the displacement caused by pseudo-student dormitories like the co-living facilities built and operated by Tripalink and alike.

In conclusion, Local 721 thanks DCP staff for their consideration of prior comments. We agree with staff that USC is non-compliant with the DA’s WIC requirement and parks funding which are not excused. So too, based on new information provided, we believe USC has significantly eliminated shuttle service and is no longer compliant with its expanded shuttle

service requirement. Local 721 hopes for a speedy remedy and urges the City to compel compliance at once. Furthermore, Local 721 respectfully believes it is time to update the South LA APC in public on the status of the Specific Plan area under Specific Plan section 15—and the community impacts caused by major, unplanned-for enrollment increases with far too little accompanying housing. These concerns must be addressed and cannot be overlooked as USC seeks yet more discretionary City actions relying on outdated studies and assumptions.

Thank you for your consideration.

Sincerely,



David Green, President and Executive Director
SEIU Local 721

ATTACHMENTS:

Exhibit A:	CPRA Document (3/4/16) DA Section 3.1.3.19 Expanded Shuttle Service
Exhibit B:	USC Bus Schedule for Fall 2014, Spring 2016, & Spring 2023
Exhibit C:	Posted USC Tram Map and Current USC Tram Map
Exhibit D:	USC Enrollment Table (Anticipated v. Actual)
Exhibit E:	Local 721 Letter RE: Sports Stadium (4/19/23); USC Forward Letter RE: Sports Stadium (4/19/23)
Exhibit F:	Local 721 Letter RE: HSC Project (4/19/23); USC Forward Letter RE: HSC Project (4/19/23)

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EXHIBIT A

DA Section 3.1.3.19 Expanded Shuttle Service

Since 2012 USC Transportation has continued to improve shuttle operations for USC and the surrounding community. We have increased service to and from Union Station and our Health Sciences Campus by including stops at Union Station on all intercampus routes, as well as upgrading the vehicles on route from 40 passenger buses to 60 passenger buses. In addition, we now provide weekend service to Union Station and the Health Science Campus, which is a great service for those needing transportation to Keck Hospital or LAC+USC Medical Center on the weekends.

Furthermore, we have increased service to the City Center, located on Olive Street near 12th Street, by extending our service through 8:20 pm. We have also increased our capacity by upgrading the vehicle on route to a 30 passenger bus from an eight passenger van.

We also increased the capacity on our Marina Del Rey shuttle. This route was limited to an eight passenger van in 2012. It has since been upgraded to a 30 passenger bus.

Finally, we brought back the service to LA Live. This service was actually cancelled in Fall of 2012 due to funding. The expectation was that the ExpoLine would be the preferred mode of travel. We were able to secure funding for the shuttle and resumed service in January 2014.

If the information is better summarized by a list, here is a list of changes we have made to increase service.

1. Increased capacity on the Union Station and Health Science Campus routes by adding additional stops at Union Station and Soto building and increasing the size of the vehicle, adding 20 passengers per departure.
2. Added weekend service to Union Station and Health Science Campus.
3. Increased capacity to City Center by extending service to 8:20pm and increasing the size of the vehicle, adding 22 passengers per departure.
4. Increased capacity to Marina Del Rey by increasing the size of the vehicle, adding 22 passengers per departure.
5. Resumed shuttle service to LA Live

EXHIBIT B

Bus Schedules - FALL 2014

Closed on all University Holidays

University Park Campus

Health Sciences Campus

Union Station

Alhambra

L.A. Live-Resumes Aug 29

6:30 PM to 2:00 AM Friday and Saturday Only

Route does not have a departure time from L.A. Live.

Trip to LA Live is about 15 minutes.

[View Schedule & Stops](#)

NEW: Weekend Intercampus Shuttle-starts Sept 6

Departs UPC from 8:30 AM to 3:55 PM, Saturday and Sunday

Shuttle does not operate on Sept 27, Oct 4, Oct 18, Nov 29 (Football Saturdays)

[View Schedule & Stops](#)

CAL to UPC to Union Station

This bus will stop at CAL before continuing on to UPC then to Union Station

[View Schedule & Stops](#)

Route A

Service from 7:35 AM to 11:05 PM, Monday-Friday.

Shuttles leave Leavey Library every 30 minutes.

[View Schedule & Stops](#)

AT&T to UPC

Service from 7:50 AM to 8:20 PM, Monday-Friday

Board the shuttle at AT&T

[View Schedule & Stops](#)

Parking Center

Service from 6:00 AM to 10:00 PM, Monday-Friday

Bus departs Parking Center Structure every 15 minutes between 8:00 AM – 7:00 PM

Every 20 minutes between 6:00 AM-8:00 AM and 7:00 PM-10 PM

[View Schedule & Stops](#)

Route C

Service from 6:30 AM to 7:00 AM, Monday-Friday

and 11:10 PM to 2:50 AM, 7 days a week

Bus departs from Leavey Library every 30 minutes

[View Schedule & Stops](#)

Route B

Service from 7:20 AM to 10:50 PM, Monday-Friday.

Shuttles leave Leavey Library every 30 minutes.

[View Schedule & Stops](#)

UPC to Union Station

Service from 7:00 AM to 10:05 PM, Monday-Friday

Shuttles leave JEP House and also stop at 34th & McClintock

[View Schedule & Stops](#)

UPC to AT&T

Service from 7:40 AM to 5:20 PM, Monday-Friday

Board the shuttle at The Alumni House / Gate 2

[View Schedule & Stops](#)

Bus Schedules - Spring 2016 (Begins Monday, January 11th)

Closed on all University Holidays

University Park Campus

Health Sciences Campus

Union Station

Alhambra

Route A

Service from 7:35 AM to 8:05 PM, Monday-Friday.
Shuttles leave Leavey Library every 30 minutes.

[View Schedule & Stops](#)

L.A. Live – Begins January 15th

6:30 PM to 2:00 AM Friday and Saturday Only
Route does not have a departure time from L.A. Live.
Trip to LA Live is about 15 minutes.

[View Schedule & Stops](#)

Inter-campus (ICS) UPC-UNION STATION-HSC

Service from 7:00 AM to 9:20 PM, Monday-Friday.
Shuttles depart from JEP House and 34th Street/McClintock.
All shuttles stop at Union Station with the exception of the 7:30 AM departure.
[View Schedule & Stops](#)

Marina Del Rey Shuttle

Service from 8:05 AM to 5:45 PM, Monday-Friday.
Bus departs from The Alumni House / Gate 2.
Drop off at ICT and ISI
[View Schedule & Stops](#)

City Center (AT&T) to UPC

Service from 7:40 AM to 8:20 PM, Monday-Friday
Board the shuttle at City Center (AT&T)
[View Schedule & Stops](#)

Parking Center

Service from 6:00 AM to 10:00 PM, Monday-Friday
Bus departs Parking Center Structure every 15 minutes between 7:00 AM – 6:00 PM
Every 20 minutes between 6:00 AM-7:00 AM and 6:00 PM-10 PM
[View Schedule & Stops](#)

Route C

Service at 6:30 AM and 7:00 AM, and also from 8:20 PM to 2:50 AM, Monday-Friday
Bus departs from Leavey Library every 30 minutes

[View Schedule & Stops](#)

Route B

Service from 7:20 AM to 7:50 PM, Monday-Friday.
Shuttles leave Leavey Library every 30 minutes.

[View Schedule & Stops](#)

UPC to Union Station

Service from 7:00 AM to 10:05 PM, Monday-Friday.
Prior to 3:10 PM, all service is provided by the Inter-campus Shuttle
Shuttles depart from JEP House and 34th Street/McClintock.
[View Schedule & Stops](#)

UPC to City Center (AT&T)

Service every hour from 7:30 AM to 5:30 PM, Monday-Friday
Board the shuttle at The Alumni House / Entrance 2
[View Schedule & Stops](#)

CAL to UPC to Union Station

This bus will stop at CAL before continuing on to UPC then to Union Station
[View Schedule & Stops](#)

Weekend Inter-campus Shuttle – Begins January 23rd

Service from 8:30 am to 4:30 pm on Saturdays and Sundays.

[View Schedule & Stops](#)

Bus Schedules - Spring 2023

Closed on all University Holidays

University Park Campus

Health Sciences Campus

Union Station

Alhambra

Weekend Intercampus Shuttle (begins Saturday, January 21st)

Operates from 8:30AM to 4:30PM on Saturdays and Sundays, beginning January 21, 2023.

There is no service during Spring Break: Saturday March 18, and Sunday March 19.

The last day of service will be Sunday, May 7, 2023.

[View Schedule & Stops](#)

Intercampus (ICS) UPC-Union Station-HSC

Service from 7:00 AM to 9:20 PM, Monday-Friday.

Board the shuttle at the bus stops at Jefferson bus turnout (just east of Hoover)

All shuttles stop at Union Station **Berth #6**.

Bus discharges at HSC at the bus stop on Eastlake, just south of Biggy. Bus does not service Soto.

[View Schedule & Stops](#)

Marina Del Rey Shuttle

Service from UPC at Vivian Hall (VHE) to ICT and ISI Monday-Friday.

ICT: 12015 Waterfront Dr, Playa Vista 90094

ISI: Bus Stop is at the Northwest corner of Mindanao Way and Admiralty Way. (May relocate due to construction)

[View Schedule & Stops](#)

USC Tower (SCT) "aka City Center" to UPC

Service every hour from **8:20 AM to 5:20 PM** Monday-Friday from SCT to University Club on 34th Street.

Board the shuttle at USC Tower (SCT) "aka City Center" on Olive St between 12th and 11th.

***Beginning Monday, October 17th, there will be a second stop at Michelson added to the route.

[View Schedule & Stops](#)

Parking Center

Service from 6:00 AM to **6:00 PM**, Monday-Friday.

Bus departs Grand Ave Structure (formerly USC Parking Center) every 15 minutes between 7:00 AM – 6:00 PM.

Every 20 minutes between 6:00 AM-7:00 AM.

[View Schedule & Stops](#)

C Route

Bus departs from Leavey Library every 20 minutes, from 7:00am-6:00pm, then every 30 minutes from 6:30pm to **10:00pm** Monday-Friday. There is also an early bus that departs at **6:20am**.

[View Schedule & Stops](#)

UPC to Union Station

Service from 7:00 AM to 10:05 PM, Monday-Friday.

Prior to 3:20 PM, all service is provided by the Intercampus Shuttle.

Between 6:05 PM and 9:25 PM, all service is provided via the Intercampus Shuttle.

Shuttles depart from Jefferson bus turnout (just east of Hoover)

[View Schedule & Stops](#)

UPC to USC Tower (SCT) "aka City Center"

Service from University Club (on 34th Street) and Michelson Hall (MCB) to USC Tower (SCT).

Bus departs University Club at the top of every hour from **8:00 AM** to 5:00 PM. Then the bus departs Michelson Hall 5 minutes later from 8:05 AM to **5:05 PM**, Monday-Friday.

***Beginning Monday, October 17th, the bus will also service Michelson on McClintock 5 minutes after departing University Club before heading to SCT.

[View Schedule & Stops](#)

CAL to Union Station

Bus departs CAL then goes on to Jefferson bus turnout en-route to Union Station.

[View Schedule & Stops](#)

EXHIBIT C

Outdated USC Tram Map Posted Near USC Parking Center



Current USC Tram Map (retrieve May 10, 2023) <https://www.uscbuses.com/map>.

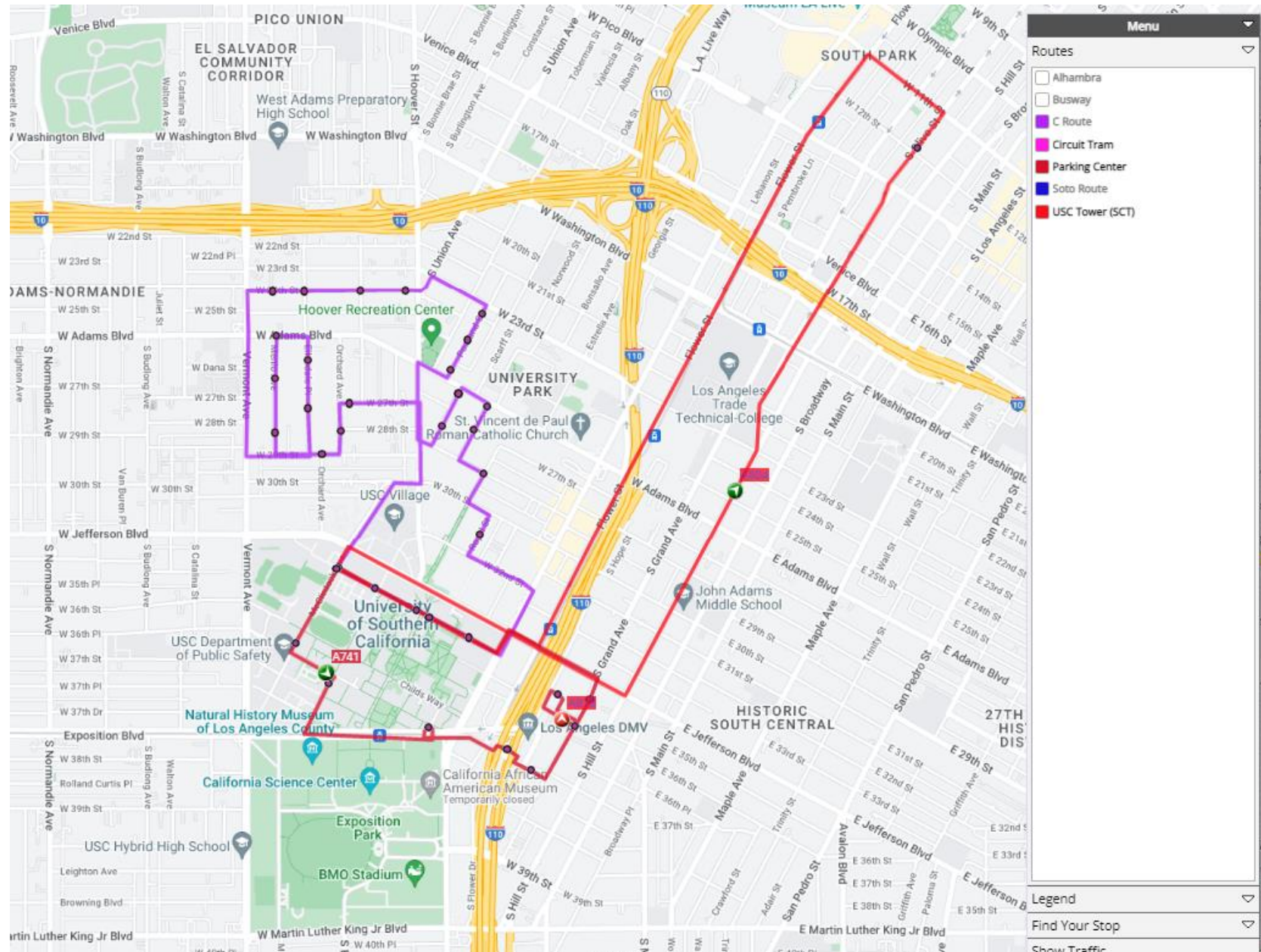


EXHIBIT D

EXHIBIT B: USC ENROLLMENT (ANTICIPATED V. ACTUAL)

ACADEMIC PERIOD		ANTICIPATED ENROLLMENT [a]			ACTUAL ENROLLMENT		
		Undergraduate	Graduate	Total	Undergraduate	Graduate	Total
2009	2010	16,023	14,805	30,828	16,751	18,073	34,824 [b]
2010	2011	16,103	14,951	31,055	17,380	19,516	36,896 [c]
2011	2012	16,184	15,099	31,283	17,414	20,596	38,010 [d]
2012	2013	16,266	15,248	31,514	18,316	21,642	39,958 [e]
2013	2014	16,347	15,399	31,746	18,445	22,923	41,368 [f]
2014	2015	16,429	15,551	31,980	18,740	23,729	42,469 [g]
2015	2016	16,512	15,705	32,216	18,810	24,591	43,401 [h]
2016	2017	16,595	15,860	32,454	18,794	25,077	43,871 [i]
2017	2018	16,678	16,016	32,694	19,170	26,517	45,687 [j]
2018	2019	16,762	16,175	32,936	19,907	27,403	47,310 [k]
2019	2020	16,846	16,334	33,180	20,351	27,970	48,321 [l]
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2024	2025	17,273	17,157	34,431	20,761	30,459	51,219
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2029	2030	17,711	18,022	35,733	22,300	36,247	58,547
2030	2031	17,800	18,200	36,000	22,622	37,530	60,152
CAGR		0.50%	0.99%		1.44%	3.54%	

NOTES:

a: Draft EIR, APP-J, Employment, Housing and Population Impacts Assessment, PDF p. 29, https://planning.lacity.org/eir/USC/Feir/files/USC%20Appendix%20J%20-%20Emp-Hsg-Pop%20Tech%20Report%205_13_10.pdf.

b: USC 2010 Financial Report, PDF p. 15, <https://customsitesmedia.usc.edu/wp-content/uploads/sites/501/2019/02/19101238/2010-USC-Financial-Report.pdf>.

c: USC 2011 Financial Report, PDF p. 16, <https://customsitesmedia.usc.edu/wp-content/uploads/sites/501/2019/02/19101237/2011-USC-Financial-Report.pdf>.

d: CDS 2011-2012, PDF p. 2, https://oir.usc.edu/wp-content/uploads/2015/11/CDS_2011-2012-public1.pdf; USC 2012 Financial Report, PDF p. 21, <https://customsitesmedia.usc.edu/wp-content/uploads/sites/501/2019/02/19101236/2012-USC-Financial-Report.pdf>.

e: CDS 2011-2012, PDF p. 2, https://oir.usc.edu/wp-content/uploads/2015/10/CDS-2012-2013-public_new3.pdf.

f: CDS 2013-2014, PDF p. 2, https://oir.usc.edu/wp-content/uploads/2015/11/CDS_2013-2014_public.pdf.

g: CDS 2014-2015, PDF p. 2, <https://oir.usc.edu/wp-content/uploads/2015/11/CDS-2014-15.pdf>.

h: CDS 2015-2016, PDF p. 2, https://oir.usc.edu/wp-content/uploads/2017/05/CDS-2015-2016_2.pdf; USC 2016 Financial Report, PDF p. 5, <https://customsitesmedia.usc.edu/wp-content/uploads/sites/501/2019/02/19101234/2016-USC-Financial-Report.pdf>.

i: CDS 2016-2017, PDF p. 3, https://oir.usc.edu/wp-content/uploads/2015/10/CDS_2016-2017.pdf.

j: CDS 2017-2018, PDF p. 3, https://oir.usc.edu/wp-content/uploads/2018/03/CDS_2017-2018_FINAL_2.pdf; USC 2017 Financial Report, PDF p. 5, <https://customsitesmedia.usc.edu/wp-content/uploads/sites/501/2019/02/19101234/2017-USC-Financial-Report.pdf>.

k: CDS 2018-2019, PDF p. 1, https://oir.usc.edu/wp-content/uploads/2019/06/CDS_2018-2019_FINAL1.pdf; USC 2018 Financial Report, PDF p. 5, <https://customsitesmedia.usc.edu/wp-content/uploads/sites/501/2019/02/19101233/2018-USC-Financial-Report.pdf>.

l: CDS 2019-2020, PDF p. 1, https://oir.usc.edu/wp-content/uploads/2020/07/CDS_2019-2020_FINAL.pdf; USC 2019 Financial Report, PDF p. 5, <https://about.usc.edu/files/2020/07/USC-2019-Annual-ReportFINAL.pdf>.

m: CDS 2020-2021, PDF p. 2, https://oir.usc.edu/wp-content/uploads/2021/07/CDS_2020-2021.pdf; USC 2020 Financial

EXHIBIT E



LAND USE, ENVIRONMENTAL & MUNICIPAL LAWYERS

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April 19, 2023

VIA E-MAIL:

Stephanie Escobar, City Planning Associate (stephanie.escobar@lacity.org)
Department of City Planning, City of Los Angeles

**RE: USC WOMEN'S SPORTS STADIUM (3011-3025 S. UNIVERSITY AVENUE, 90007);
DCP CASE NOS. CPC-2022-5429, ENV-2009-271;
REQUEST FOR SUPPLEMENTAL/SUBSEQUENT EIR AND/OR 30-DAY PUBLIC REVIEW OF ADDENDUM**

Dear Ms. Escobar:

On behalf of SEIU Local 721 and its members ("Local 721"), this office respectfully requests that the City of Los Angeles ("City") Department of City Planning ("DCP") provide no less than 30 days of public review of any addendum to a previously certified environmental impact report ("EIR") involving the above-referenced University of Southern California ("USC") women's sports stadium project ("Project") located at the USC University Park Campus ("UPC").

Local 721 understands that, for purposes of the stadium Project's environmental review under the California Environmental Quality Act ("CEQA"), USC intends to use an addendum to a 2010/2013 Environmental Impact Report (State Clearinghouse No. 2009011101) ("EIR") involving the USC Park Campus Specific Plan ("Specific Plan") redevelopment of the USC UPC campus (associated with DCP Case No. ENV-2009-271).

Here, using an addendum raises both substantive and procedural issues. For example, we question the continued validity of this outdated Specific Plan analysis. For example, the stadium Project is not mentioned in the Specific Plan EIR and the stadium site is not located within the EIR project boundary. Additionally, the EIR's fundamental enrollment assumptions and on-site housing demands are no longer valid. For example, the EIR assumed only a small annual increase in student enrollment from roughly 30,828 students (2009) to 36,000 students (2030).¹ Yet, according to USC's Common Data Set 2021-20 (see excerpts following page [highlights added]), USC had 49,318 total students as of October 15, 2021 (in yellow)—42,631 of which were full-time students (in green).² The USC Specific Plan analysis is no longer good and cannot be relied on for new discretionary project approvals, such as this discretionary stadium Project. The impacts of the proposed stadium need to be studied in a bona fide project-specific subsequent/supplemental EIR—not an abbreviated addendum shortcut.

/ / /

¹ See Draft EIR, [Appendix J](#), p. 22; see also Draft EIR, [Appendix C-2](#), PDF pp. 118, 156.

² https://oir.usc.edu/wp-content/uploads/2022/06/CDS_2021-2022_FINAL.pdf.

B. ENROLLMENT AND PERSISTENCE**B1 Institutional Enrollment - Men and Women**

Provide numbers of students for each of the following categories as of the institution's official fall reporting date or as of **October 15, 2021**.

- Note: Report students formerly designated as "first professional" in the graduate cells. For information on reporting study abroad students please see this [link](#).

	FULL-TIME		PART-TIME	
	Men	Women	Men	Women
Undergraduates				
Degree-seeking, first-time freshmen	1,736	1,928	1	3
Other first-year, degree-seeking	655	688	1	9
All other degree-seeking	7,311	7,792	270	225
Total degree-seeking	9,702	10,408	272	237
All other undergraduates enrolled in credit courses	54	42	46	29
Total undergraduates	9,756	10,450	318	266
Graduate				
Degree-seeking, first-time	3,763	4,430	510	744
All other degree-seeking	5,940	7,818	2,051	2,469
All other graduates enrolled in credit courses	211	263	158	171
Total graduate	9,914	12,511	2,719	3,384
Total all students	19,670	22,961	3,037	3,650

Total all undergraduates 20,790

Total all graduate 28,528

GRAND TOTAL ALL STUDENTS 49,318

Furthermore, because CEQA does not require circulation of an addendum (CEQA Guidelines § 15164), an addendum does not provide sufficient public review when it could be released just 72 hours before the City acts on the requested conditional use permits ("CUP(s)") under the Brown Act (Gov. Code § 54957.5). Thus, at minimum, we respectfully request that the City exercise its discretion and provide the public with at least 30 days to review any CEQA document or addendum for this USC stadium project before acting on any of the requested CUPs. The community needs appropriate time to review the impacts of this project – there should be no rush job.

Local 721 thanks you for your consideration of these comments and reserves the right to supplement these comments in the future. Please add us to the notification list for any zoning/CEQA actions involving the above-referenced project, as required by law (see e.g., Pub. Res. Code §§ 21092.2, 21167(f); Gov. Code § 65092; Los Angeles Municipal Code § 197.01.F). Please send notice by electronic and regular mail to Jordan R. Sisson, Esq., 801 S. Grand Avenue, 11th Floor, LA, CA 90017 (jordan@gideonlaw.net).

Thank you for consideration of these comments. We ask that this letter is placed in the administrative record for the Project.

Sincerely,



 Jordan R. Sisson
 Attorney for Local 721



April 19, 2023

Stephanie Escobar, City Planning Associate
Department of City Planning, City of Los Angeles
stephanie.escobar@lacity.org

RE: USC Women's Sports Stadium (3025 S. University Ave., 90007) (CPC-2022-5429)

Dear Ms. Escobar:

We, USC Forward,¹ respectfully provide the following comment² to the City of Los Angeles ("City") Department of City Planning ("DCP") regarding the University of Southern California's ("USC" or "Applicant") proposed construction of a women's soccer/lacrosse stadium ("Project") located at the above-referenced addresses ("Site"). The Project includes the request for two Conditional Use Permits to allow: i) a stadium in the R3 zone and ii) the sale of alcoholic beverages (collectively "Entitlements").³

USC Forward understands that, for purposes of the Project's environmental analysis under the California Environmental Quality Act ("CEQA"), USC intends to prepare an addendum to the USC Park Campus Specific Plan ("Specific Plan")⁴ Environmental Impact Report (SCH NO. 2009011101) ("EIR").⁵ For the reasons discussed below, we urge the City instead to: (1) require a subsequent or supplemental EIR, not an addendum; and (2) provide a minimum 30-day public notice and comment period on the any Project CEQA document including any addendum before any action is taken on the Entitlements.

First, the Project should require a subsequent or supplemental EIR because the Project is not within the scope of the prior Specific Plan EIR. The Site is located east of the Hoover/30th Street intersection—outside the USC Specific Plan EIR area. (Compare Figure 1 with Figure 2

¹ <https://uscforward.org/about/>.

² Herein, page citations are either the stated pagination (i.e., "p. #") or PDF-page location (i.e., "PDF p. #").

³ See Project Application, p. 2, <https://planning.lacity.org/pdiscaseinfo/document/MzgwNjM0/532fbe86-06a9-44b1-8001-06cd07316c90/esubmit>.

⁴ USC Specific Plan, [https://planning.lacity.org/EIR/USC/SpecificPlans/USC%20Specific%20Plan%20\(as%20approved%20by%20City%20Council\).pdf](https://planning.lacity.org/EIR/USC/SpecificPlans/USC%20Specific%20Plan%20(as%20approved%20by%20City%20Council).pdf).

⁵ Inclusive of the Draft EIR ("DEIR") and the Final EIR ("FEIR") retrieved from DCP website (<https://planning.lacity.org/development-services/eir/university-southern-california-development-plan>).

[following page].) The Specific Plan in no way mentions a new massive women's soccer/lacrosse stadium at the Project Site next to residential neighbors. An agency's decision to use an addendum to approve a different project not contemplated or within the geographic area of the original project violates CEQA.⁶

**Figure 1: Project Site
(Applicant Project Plans)⁷**



**Figure 2: USC EIR Project Area
(DEIR, Fig. II-1)⁸**



Second, the Project should require a subsequent or supplemental EIR because there has been a significant change in the circumstances (i.e., enrollment) involving the USC Specific Plan. Under CEQA, once an EIR has been prepared, a subsequent or supplement EIR is required for granting a later discretionary approval when there have been: (i) substantial changes to the project, (ii) substantial changes in the circumstances involving the project, or (iii) significant new information involving the project. (See Pub. Res. Code § 21166; CEQA Guidelines⁹ § 15162.) Here, in 2010, the Specific Plan anticipated only a “small annual increase in student enrollment” from approximately 30,828 students (2009) to 36,000 students (2030).¹⁰ However, based on USC’s enrollment figures disclosed in its Common Data Set (“CDS”) and Annual Financial Reports from 2009 through 2021 (summarized in “Exhibit A” attached hereto), USC has grown

⁶ See e.g., *Concerned Citizens of Costa Mesa, Inc. v 32nd Dist. Agric. Ass'n* (1986) 42 C3d 929, 937 (plans for approved amphitheater project changed to increase seating significantly, expand the site, and reorient the stage to face nearby residences); *Save Berkeley's Neighborhoods v Regents of Univ. of Cal.* (2020) 51 CA5th 226, 237 (claim that university changed project described in campus long-range development plan by approving increases in student enrollment well beyond development plan and EIR projections, without considering whether further CEQA review was required, alleged violation of CEQA).

⁷ Project Plans, PDF p. 2, <https://planning.lacity.org/pdiscaseinfo/document/MzgwNjU0/532fbe86-06a9-44b1-8001-06cd07316c90/esubmit>.

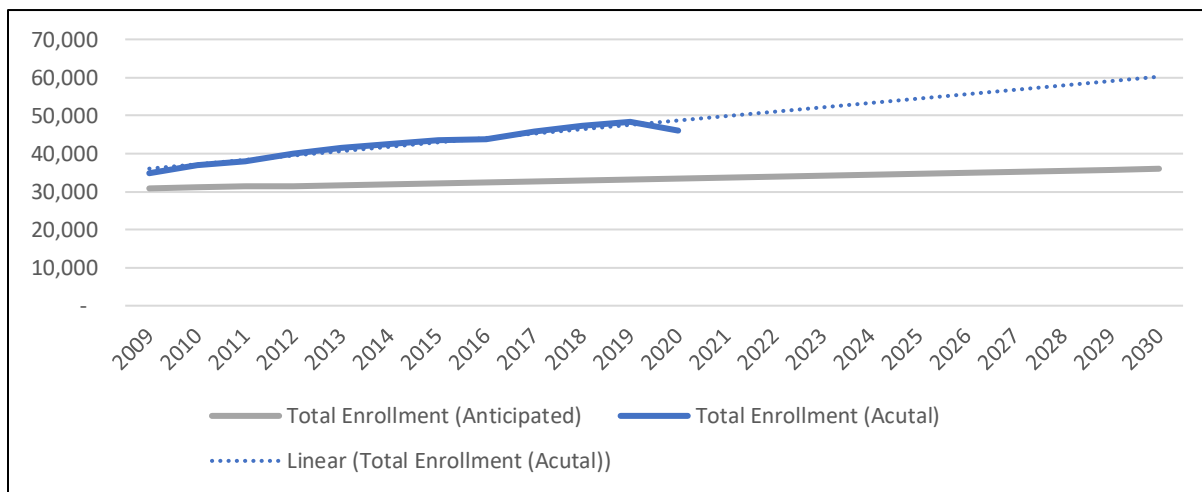
⁸ DEIR, PDF p. 3, https://planning.lacity.org/eir/USC/Feir/files/II.%20%20Project_Description.pdf.

⁹ California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387.

¹⁰ DEIR, Appendix J, Employment, Housing and Population Impacts Assessment, PDF p. 29, https://planning.lacity.org/eir/USC/Feir/files/USC%20Appendix%20J%20-%20Emp-Hsg-Pop%20Tech%20Report%205_13_10.pdf; DEIR, Appendix C-2, Historic Resources Evaluation University Park Campus, PDF p. 118, 156 <https://planning.lacity.org/eir/USC/Feir/files/USC%20Appendix%20C-2%20Historic%20Resources%20Evaluation%20University%20Pa.pdf>.

well beyond these anticipated levels. The USC Specific Plan analysis is no longer good and cannot be relied on for new discretionary project approvals, such as this discretionary stadium Project. Figure 3 below is a chart that reflects the anticipated growth in total enrollment from the USC Specific Plan (grey line) to the actual growth in total enrollment (blue line) and the trajectory of USC enrollment if the current rate of growth continues through 2030 (blue dashed line).

Figure 3: USC Actual Enrollment Compared to Anticipated Enrollment



As shown above, USC’s enrollment has clearly far exceeded what it promised and studied in 2010, and USC is not doing enough to address its growth.¹¹ For example, while the compound annual growth rate (“CAGR”) of undergraduate and graduate enrollment was anticipated to be 0.50 percent and 0.99 percent (respectively) under the EIR, the actual growth of undergraduate and graduate enrollment has been 1.44 percent and 3.54 percent CAGR (respectively)—roughly three times more than anticipated. This has serious community impacts in many ways. USC’s apparent aggressive expansion over the last ten years undermines the EIR’s fundamental assumptions just like the case of *Save Berkeley’s Neighborhoods v. Regents of University of California*, (2020) 51 Cal.App.5th 226, where the university made several discretionary decisions leading to the increased enrollment without analyzing and mitigating new impacts. (Id., at p. 237.)

Here, the stadium Project was not even contemplated in the old environmental analysis and is not in the same geographic area. An addendum is grossly improper. The impacts of the proposed stadium need to be studied in a bona fide project-specific subsequent/supplemental EIR—not an abbreviated addendum shortcut.

/ / /

¹¹ See also USC Annenberg Media (9/14/21) Freshmen, sophomores struggle to get on-campus housing (“‘It was kind of a crazy process,’ said sophomore Kaelyn Moses, a global health major living in the USC Village. ‘Honestly, the housing application was really confusing.’”), <https://www.uscannenbergmedia.com/2021/09/14/freshmen-sophomores-struggle-to-get-on-campus-housing/>.

Third, while public review of an addendum is not mandatory, the City must consider any addendum along with the original Final EIR before deciding on a proposed discretionary project. (See CEQA Guidelines §15164(d).) Here, that means the City must consider the addendum with the Final EIR to the USC Specific Plan. Collectively, this includes thousands of pages of environmental analysis. USC Forward respectfully requests that the City use its discretion to make all these documents—including any new addendum—available for at least 30 days before acting on the Entitlements. USC should not use an addendum to shortcut public notice and comment.

In sum, USC Forward respectfully disagrees with the City and Applicant's decision to prepare an addendum instead of a subsequent or supplemental EIR for the above-stated reasons. Please reconsider this decision. Moreover, in furtherance of CEQA's purpose of informed decision-making (see CEQA Guidelines § 15002(a)(1)), USC Forward asks the City to ensure no action is taken on the Entitlements before making the CEQA document or addendum available for review and comment at least 30 days.

USC Forward reserves the right to supplement these comments at future hearings and proceedings for this Project. (See *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1120 [CEQA litigation not limited only to claims made during EIR comment period].) This Office requests, to the extent not already on the notice list, all notices of CEQA actions and any approvals, Project CEQA determinations, or public hearings to be held on the Project under state or local law requiring local agencies to mail such notices to any person who has filed a written request for them. (See Pub. Res. Code §§, 21092.2, 21167(f) and Gov. Code § 65092 and Los Angeles Municipal Code § 197.01.F.) Please send notice by electronic and regular mail to Felipe Caceres, 1545 Wilshire Blvd., Ste. 100, Los Angeles, CA 90017 (felipe.caceres@seiu721.org).

Thank you for consideration of these comments. We ask that this letter is placed in the administrative record for the Project.

Sincerely,

USC FORWARD

Felipe Caceres

Felipe Caceres
(213) 361-7848
felipe.caceres@seiu721.org

ATTACHMENT:

EXHIBIT A: USC Enrollment Table (Anticipated v. Actual)

EXHIBIT A

EXHIBIT B: USC ENROLLMENT (ANTICIPATED V. ACTUAL)

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l: CDS 2019-2020, PDF p. 1, https://oir.usc.edu/wp-content/uploads/2020/07/CDS_2019-2020_FINAL.pdf; USC 2019 Financial Report, PDF p. 5, <https://about.usc.edu/files/2020/07/USC-2019-Annual-ReportFINAL.pdf>.

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EXHIBIT F



LAND USE, ENVIRONMENTAL & MUNICIPAL LAWYERS

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Direct: (951) 542-2735
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www.gideonlaw.net

April 19, 2023

VIA E-MAIL:

Stephanie Escobar, City Planning Associate (stephanie.escobar@lacity.org)
Department of City Planning, City of Los Angeles

**RE: USC WOMEN'S SPORTS STADIUM (3011-3025 S. UNIVERSITY AVENUE, 90007);
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Here, using an addendum raises both substantive and procedural issues. For example, we question the continued validity of this outdated Specific Plan analysis. For example, the stadium Project is not mentioned in the Specific Plan EIR and the stadium site is not located within the EIR project boundary. Additionally, the EIR's fundamental enrollment assumptions and on-site housing demands are no longer valid. For example, the EIR assumed only a small annual increase in student enrollment from roughly 30,828 students (2009) to 36,000 students (2030).¹ Yet, according to USC's Common Data Set 2021-20 (see excerpts following page [highlights added]), USC had 49,318 total students as of October 15, 2021 (in yellow)—42,631 of which were full-time students (in green).² The USC Specific Plan analysis is no longer good and cannot be relied on for new discretionary project approvals, such as this discretionary stadium Project. The impacts of the proposed stadium need to be studied in a bona fide project-specific subsequent/supplemental EIR—not an abbreviated addendum shortcut.

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¹ See Draft EIR, [Appendix J](#), p. 22; see also Draft EIR, [Appendix C-2](#), PDF pp. 118, 156.

² https://oir.usc.edu/wp-content/uploads/2022/06/CDS_2021-2022_FINAL.pdf.

B. ENROLLMENT AND PERSISTENCE**B1 Institutional Enrollment - Men and Women**

Provide numbers of students for each of the following categories as of the institution's official fall reporting date or as of **October 15, 2021**.

- Note: Report students formerly designated as "first professional" in the graduate cells. For information on reporting study abroad students please see this [link](#).

	FULL-TIME		PART-TIME	
	Men	Women	Men	Women
Undergraduates				
Degree-seeking, first-time freshmen	1,736	1,928	1	3
Other first-year, degree-seeking	655	688	1	9
All other degree-seeking	7,311	7,792	270	225
Total degree-seeking	9,702	10,408	272	237
All other undergraduates enrolled in credit courses	54	42	46	29
Total undergraduates	9,756	10,450	318	266
Graduate				
Degree-seeking, first-time	3,763	4,430	510	744
All other degree-seeking	5,940	7,818	2,051	2,469
All other graduates enrolled in credit courses	211	263	158	171
Total graduate	9,914	12,511	2,719	3,384
Total all students	19,670	22,961	3,037	3,650

Total all undergraduates 20,790

Total all graduate 28,528

GRAND TOTAL ALL STUDENTS 49,318

Furthermore, because CEQA does not require circulation of an addendum (CEQA Guidelines § 15164), an addendum does not provide sufficient public review when it could be released just 72 hours before the City acts on the requested conditional use permits ("CUP(s)") under the Brown Act (Gov. Code § 54957.5). Thus, at minimum, we respectfully request that the City exercise its discretion and provide the public with at least 30 days to review any CEQA document or addendum for this USC stadium project before acting on any of the requested CUPs. The community needs appropriate time to review the impacts of this project – there should be no rush job.

Local 721 thanks you for your consideration of these comments and reserves the right to supplement these comments in the future. Please add us to the notification list for any zoning/CEQA actions involving the above-referenced project, as required by law (see e.g., Pub. Res. Code §§ 21092.2, 21167(f); Gov. Code § 65092; Los Angeles Municipal Code § 197.01.F). Please send notice by electronic and regular mail to Jordan R. Sisson, Esq., 801 S. Grand Avenue, 11th Floor, LA, CA 90017 (jordan@gideonlaw.net).

Thank you for consideration of these comments. We ask that this letter is placed in the administrative record for the Project.

Sincerely,



Jordan R. Sisson
Attorney for Local 721



April 19, 2023

Stephanie Escobar, City Planning Associate
Department of City Planning, City of Los Angeles
stephanie.escobar@lacity.org

RE: USC Women's Sports Stadium (3025 S. University Ave., 90007) (CPC-2022-5429)

Dear Ms. Escobar:

We, USC Forward,¹ respectfully provide the following comment² to the City of Los Angeles ("City") Department of City Planning ("DCP") regarding the University of Southern California's ("USC" or "Applicant") proposed construction of a women's soccer/lacrosse stadium ("Project") located at the above-referenced addresses ("Site"). The Project includes the request for two Conditional Use Permits to allow: i) a stadium in the R3 zone and ii) the sale of alcoholic beverages (collectively "Entitlements").³

USC Forward understands that, for purposes of the Project's environmental analysis under the California Environmental Quality Act ("CEQA"), USC intends to prepare an addendum to the USC Park Campus Specific Plan ("Specific Plan")⁴ Environmental Impact Report (SCH NO. 2009011101) ("EIR").⁵ For the reasons discussed below, we urge the City instead to: (1) require a subsequent or supplemental EIR, not an addendum; and (2) provide a minimum 30-day public notice and comment period on the any Project CEQA document including any addendum before any action is taken on the Entitlements.

First, the Project should require a subsequent or supplemental EIR because the Project is not within the scope of the prior Specific Plan EIR. The Site is located east of the Hoover/30th Street intersection—outside the USC Specific Plan EIR area. (Compare Figure 1 with Figure 2

¹ <https://uscforward.org/about/>.

² Herein, page citations are either the stated pagination (i.e., "p. #") or PDF-page location (i.e., "PDF p. #").

³ See Project Application, p. 2, <https://planning.lacity.org/pdiscaseinfo/document/MzgwNjM0/532fbe86-06a9-44b1-8001-06cd07316c90/esubmit>.

⁴ USC Specific Plan, [https://planning.lacity.org/EIR/USC/SpecificPlans/USC%20Specific%20Plan%20\(as%20approved%20by%20City%20Council\).pdf](https://planning.lacity.org/EIR/USC/SpecificPlans/USC%20Specific%20Plan%20(as%20approved%20by%20City%20Council).pdf).

⁵ Inclusive of the Draft EIR ("DEIR") and the Final EIR ("FEIR") retrieved from DCP website (<https://planning.lacity.org/development-services/eir/university-southern-california-development-plan>).

[following page].) The Specific Plan in no way mentions a new massive women's soccer/lacrosse stadium at the Project Site next to residential neighbors. An agency's decision to use an addendum to approve a different project not contemplated or within the geographic area of the original project violates CEQA.⁶

**Figure 1: Project Site
(Applicant Project Plans)⁷**



**Figure 2: USC EIR Project Area
(DEIR, Fig. II-1)⁸**



Second, the Project should require a subsequent or supplemental EIR because there has been a significant change in the circumstances (i.e., enrollment) involving the USC Specific Plan. Under CEQA, once an EIR has been prepared, a subsequent or supplement EIR is required for granting a later discretionary approval when there have been: (i) substantial changes to the project, (ii) substantial changes in the circumstances involving the project, or (iii) significant new information involving the project. (See Pub. Res. Code § 21166; CEQA Guidelines⁹ § 15162.) Here, in 2010, the Specific Plan anticipated only a “small annual increase in student enrollment” from approximately 30,828 students (2009) to 36,000 students (2030).¹⁰ However, based on USC’s enrollment figures disclosed in its Common Data Set (“CDS”) and Annual Financial Reports from 2009 through 2021 (summarized in “Exhibit A” attached hereto), USC has grown

⁶ See e.g., *Concerned Citizens of Costa Mesa, Inc. v 32nd Dist. Agric. Ass'n* (1986) 42 C3d 929, 937 (plans for approved amphitheater project changed to increase seating significantly, expand the site, and reorient the stage to face nearby residences); *Save Berkeley's Neighborhoods v Regents of Univ. of Cal.* (2020) 51 CA5th 226, 237 (claim that university changed project described in campus long-range development plan by approving increases in student enrollment well beyond development plan and EIR projections, without considering whether further CEQA review was required, alleged violation of CEQA).

⁷ Project Plans, PDF p. 2, <https://planning.lacity.org/pdiscaseinfo/document/MzgwNjU0/532fbe86-06a9-44b1-8001-06cd07316c90/esubmit>.

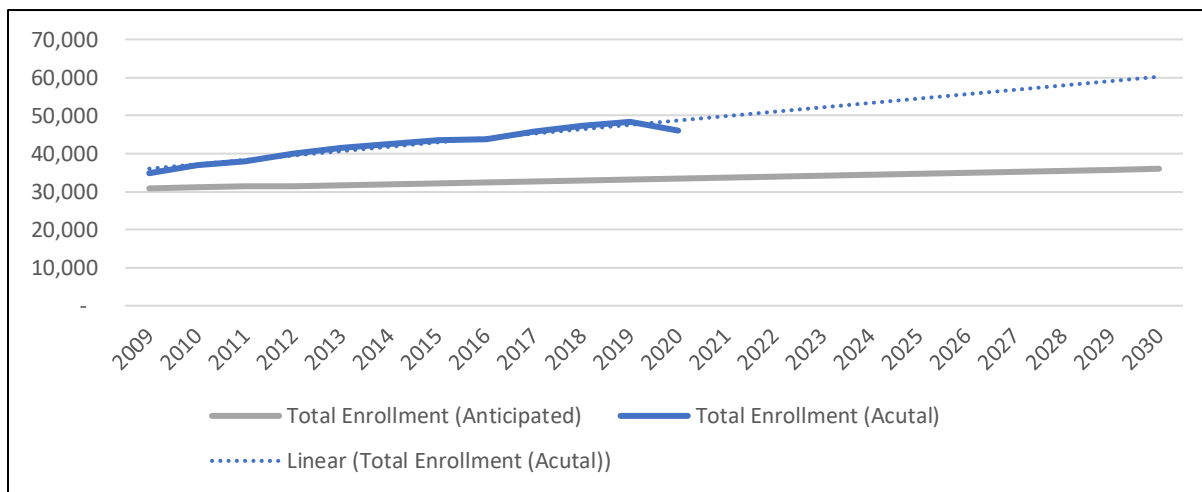
⁸ DEIR, PDF p. 3, https://planning.lacity.org/eir/USC/Feir/files/II.%20%20Project_Description.pdf.

⁹ California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387.

¹⁰ DEIR, Appendix J, Employment, Housing and Population Impacts Assessment, PDF p. 29, https://planning.lacity.org/eir/USC/Feir/files/USC%20Appendix%20J%20-%20Emp-Hsg-Pop%20Tech%20Report%205_13_10.pdf; DEIR, Appendix C-2, Historic Resources Evaluation University Park Campus, PDF p. 118, 156 <https://planning.lacity.org/eir/USC/Feir/files/USC%20Appendix%20C-2%20Historic%20Resources%20Evaluation%20University%20Pa.pdf>.

well beyond these anticipated levels. The USC Specific Plan analysis is no longer good and cannot be relied on for new discretionary project approvals, such as this discretionary stadium Project. Figure 3 below is a chart that reflects the anticipated growth in total enrollment from the USC Specific Plan (grey line) to the actual growth in total enrollment (blue line) and the trajectory of USC enrollment if the current rate of growth continues through 2030 (blue dashed line).

Figure 3: USC Actual Enrollment Compared to Anticipated Enrollment



As shown above, USC’s enrollment has clearly far exceeded what it promised and studied in 2010, and USC is not doing enough to address its growth.¹¹ For example, while the compound annual growth rate (“CAGR”) of undergraduate and graduate enrollment was anticipated to be 0.50 percent and 0.99 percent (respectively) under the EIR, the actual growth of undergraduate and graduate enrollment has been 1.44 percent and 3.54 percent CAGR (respectively)—roughly three times more than anticipated. This has serious community impacts in many ways. USC’s apparent aggressive expansion over the last ten years undermines the EIR’s fundamental assumptions just like the case of *Save Berkeley’s Neighborhoods v. Regents of University of California*, (2020) 51 Cal.App.5th 226, where the university made several discretionary decisions leading to the increased enrollment without analyzing and mitigating new impacts. (Id., at p. 237.)

Here, the stadium Project was not even contemplated in the old environmental analysis and is not in the same geographic area. An addendum is grossly improper. The impacts of the proposed stadium need to be studied in a bona fide project-specific subsequent/supplemental EIR—not an abbreviated addendum shortcut.

/ / /

¹¹ See also USC Annenberg Media (9/14/21) Freshmen, sophomores struggle to get on-campus housing (“‘It was kind of a crazy process,’ said sophomore Kaelyn Moses, a global health major living in the USC Village. ‘Honestly, the housing application was really confusing.’”), <https://www.uscannenbergmedia.com/2021/09/14/freshmen-sophomores-struggle-to-get-on-campus-housing/>.

Third, while public review of an addendum is not mandatory, the City must consider any addendum along with the original Final EIR before deciding on a proposed discretionary project. (See CEQA Guidelines §15164(d).) Here, that means the City must consider the addendum with the Final EIR to the USC Specific Plan. Collectively, this includes thousands of pages of environmental analysis. USC Forward respectfully requests that the City use its discretion to make all these documents—including any new addendum—available for at least 30 days before acting on the Entitlements. USC should not use an addendum to shortcut public notice and comment.

In sum, USC Forward respectfully disagrees with the City and Applicant's decision to prepare an addendum instead of a subsequent or supplemental EIR for the above-stated reasons. Please reconsider this decision. Moreover, in furtherance of CEQA's purpose of informed decision-making (see CEQA Guidelines § 15002(a)(1)), USC Forward asks the City to ensure no action is taken on the Entitlements before making the CEQA document or addendum available for review and comment at least 30 days.

USC Forward reserves the right to supplement these comments at future hearings and proceedings for this Project. (See *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1120 [CEQA litigation not limited only to claims made during EIR comment period].) This Office requests, to the extent not already on the notice list, all notices of CEQA actions and any approvals, Project CEQA determinations, or public hearings to be held on the Project under state or local law requiring local agencies to mail such notices to any person who has filed a written request for them. (See Pub. Res. Code §§, 21092.2, 21167(f) and Gov. Code § 65092 and Los Angeles Municipal Code § 197.01.F.) Please send notice by electronic and regular mail to Felipe Caceres, 1545 Wilshire Blvd., Ste. 100, Los Angeles, CA 90017 (felipe.caceres@seiu721.org).

Thank you for consideration of these comments. We ask that this letter is placed in the administrative record for the Project.

Sincerely,

USC FORWARD

Felipe Caceres

Felipe Caceres
(213) 361-7848
felipe.caceres@seiu721.org

ATTACHMENT:

EXHIBIT A: USC Enrollment Table (Anticipated v. Actual)

EXHIBIT A

EXHIBIT B: USC ENROLLMENT (ANTICIPATED V. ACTUAL)

ACADEMIC PERIOD		ANTICIPATED ENROLLMENT [a]			ACTUAL ENROLLMENT		
		Undergraduate	Graduate	Total	Undergraduate	Graduate	Total
2009	2010	16,023	14,805	30,828	16,751	18,073	34,824 [b]
2010	2011	16,103	14,951	31,055	17,380	19,516	36,896 [c]
2011	2012	16,184	15,099	31,283	17,414	20,596	38,010 [d]
2012	2013	16,266	15,248	31,514	18,316	21,642	39,958 [e]
2013	2014	16,347	15,399	31,746	18,445	22,923	41,368 [f]
2014	2015	16,429	15,551	31,980	18,740	23,729	42,469 [g]
2015	2016	16,512	15,705	32,216	18,810	24,591	43,401 [h]
2016	2017	16,595	15,860	32,454	18,794	25,077	43,871 [i]
2017	2018	16,678	16,016	32,694	19,170	26,517	45,687 [j]
2018	2019	16,762	16,175	32,936	19,907	27,403	47,310 [k]
2019	2020	16,846	16,334	33,180	20,351	27,970	48,321 [l]
2020	2021	16,930	16,496	33,426	19,606	26,501	46,107 [m]
2021	2022	17,015	16,659	33,674	19,889	27,439	47,328
2022	2023	17,101	16,823	33,924	20,175	28,411	48,586
2023	2024	17,187	16,990	34,176	20,466	29,417	49,883
2024	2025	17,273	17,157	34,431	20,761	30,459	51,219
2025	2026	17,360	17,327	34,687	21,060	31,537	52,597
2026	2027	17,447	17,498	34,945	21,363	32,654	54,017
2027	2028	17,535	17,671	35,206	21,671	33,810	55,481
2028	2029	17,623	17,846	35,468	21,983	35,007	56,991
2029	2030	17,711	18,022	35,733	22,300	36,247	58,547
2030	2031	17,800	18,200	36,000	22,622	37,530	60,152
CAGR		0.50%	0.99%		1.44%	3.54%	

NOTES:

a: Draft EIR, APP-J, Employment, Housing and Population Impacts Assessment, PDF p. 29, https://planning.lacity.org/eir/USC/Feir/files/USC%20Appendix%20J%20-%20Emp-Hsg-Pop%20Tech%20Report%205_13_10.pdf.

b: USC 2010 Financial Report, PDF p. 15, <https://customsitesmedia.usc.edu/wp-content/uploads/sites/501/2019/02/19101238/2010-USC-Financial-Report.pdf>.

c: USC 2011 Financial Report, PDF p. 16, <https://customsitesmedia.usc.edu/wp-content/uploads/sites/501/2019/02/19101237/2011-USC-Financial-Report.pdf>.

d: CDS 2011-2012, PDF p. 2, https://oir.usc.edu/wp-content/uploads/2015/11/CDS_2011-2012-public1.pdf; USC 2012 Financial Report, PDF p. 21, <https://customsitesmedia.usc.edu/wp-content/uploads/sites/501/2019/02/19101236/2012-USC-Financial-Report.pdf>.

e: CDS 2011-2012, PDF p. 2, https://oir.usc.edu/wp-content/uploads/2015/10/CDS-2012-2013-public_new3.pdf.

f: CDS 2013-2014, PDF p. 2, https://oir.usc.edu/wp-content/uploads/2015/11/CDS_2013-2014_public.pdf.

g: CDS 2014-2015, PDF p. 2, <https://oir.usc.edu/wp-content/uploads/2015/11/CDS-2014-15.pdf>.

h: CDS 2015-2016, PDF p. 2, https://oir.usc.edu/wp-content/uploads/2017/05/CDS-2015-2016_2.pdf; USC 2016 Financial Report, PDF p. 5, <https://customsitesmedia.usc.edu/wp-content/uploads/sites/501/2019/02/19101234/2016-USC-Financial-Report.pdf>.

i: CDS 2016-2017, PDF p. 3, https://oir.usc.edu/wp-content/uploads/2015/10/CDS_2016-2017.pdf.

j: CDS 2017-2018, PDF p. 3, https://oir.usc.edu/wp-content/uploads/2018/03/CDS_2017-2018_FINAL_2.pdf; USC 2017 Financial Report, PDF p. 5, <https://customsitesmedia.usc.edu/wp-content/uploads/sites/501/2019/02/19101234/2017-USC-Financial-Report.pdf>.

k: CDS 2018-2019, PDF p. 1, https://oir.usc.edu/wp-content/uploads/2019/06/CDS_2018-2019_FINAL1.pdf; USC 2018 Financial Report, PDF p. 5, <https://customsitesmedia.usc.edu/wp-content/uploads/sites/501/2019/02/19101233/2018-USC-Financial-Report.pdf>.

l: CDS 2019-2020, PDF p. 1, https://oir.usc.edu/wp-content/uploads/2020/07/CDS_2019-2020_FINAL.pdf; USC 2019 Financial Report, PDF p. 5, <https://about.usc.edu/files/2020/07/USC-2019-Annual-ReportFINAL.pdf>.

m: CDS 2020-2021, PDF p. 2, https://oir.usc.edu/wp-content/uploads/2021/07/CDS_2020-2021.pdf; USC 2020 Financial

GENERAL INFORMATION ABOUT THE CONTENTS OF THIS FILE

Submissions by the public in compliance with the Commission Rules and Operating Procedures (ROPs), Rule 4.3, are distributed to the Commission and uploaded online. Please note that “compliance” means that the submission complies with deadline, delivery method (hard copy and/or electronic) AND the number of copies. Please review the Commission ROPs to ensure that you meet the submission requirements. The ROPs can be accessed at <http://planning.lacity.org>, by selecting “Commissions & Hearings” and selecting the specific Commission.

All compliant submissions may be accessed as follows:

- **“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.

Material which does not comply with the submission rules is not distributed to the Commission.

ENABLE BOOKMARS ONLINE:

**If you are using Explorer, you need will need to enable the Acrobat  toolbar to see the bookmarks on the left side of the screen.

If you are using Chrome, the bookmarks are on the upper right-side of the screen. If you do not want to use the bookmarks, simply scroll through the file.

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

SECONDARY SUBMISSIONS



Planning APC South LA <apcsouthla@lacity.org>

Major nuisance located @ 1154 w. 67 st

Frank Ward <fward1910@gmail.com>

Thu, Aug 31, 2023 at 1:08 PM

To: apcsouthla@lacity.org

Cc: "akinyele.turner@lacity.org" <akinyele.turner@lacity.org>

To whom this email my concern..

I'm sending this email for all home owners living on 67th street (Budlong to Vermont) from my understanding and from what I was told. You have a house 1154 w 67 st that have been a MAJOR NUISANCE!!!!!! The house was gated up but no trespassing signs was applied.. You have the street take over boys in and out the house striping cars stealing batteries out the home owners cars taking they tires off they car people fighting screaming all night people scared to call the police due to the fact they will be exposed for calling the police so we need this house removed and some senior living homes built... We also have a super old store located on 66 and vermont that need to be removed and a Gym built for the neighborhood Thank you so much for your time my name is Tyrone 323 481 6802 you need anything else call me PS. I sent some pictures of stolen cars and trucks

8 attachments**Screenshot_20230817-145928_Maps.jpg**
96K**IMG_20230705_170356_1688604922076.jpg**
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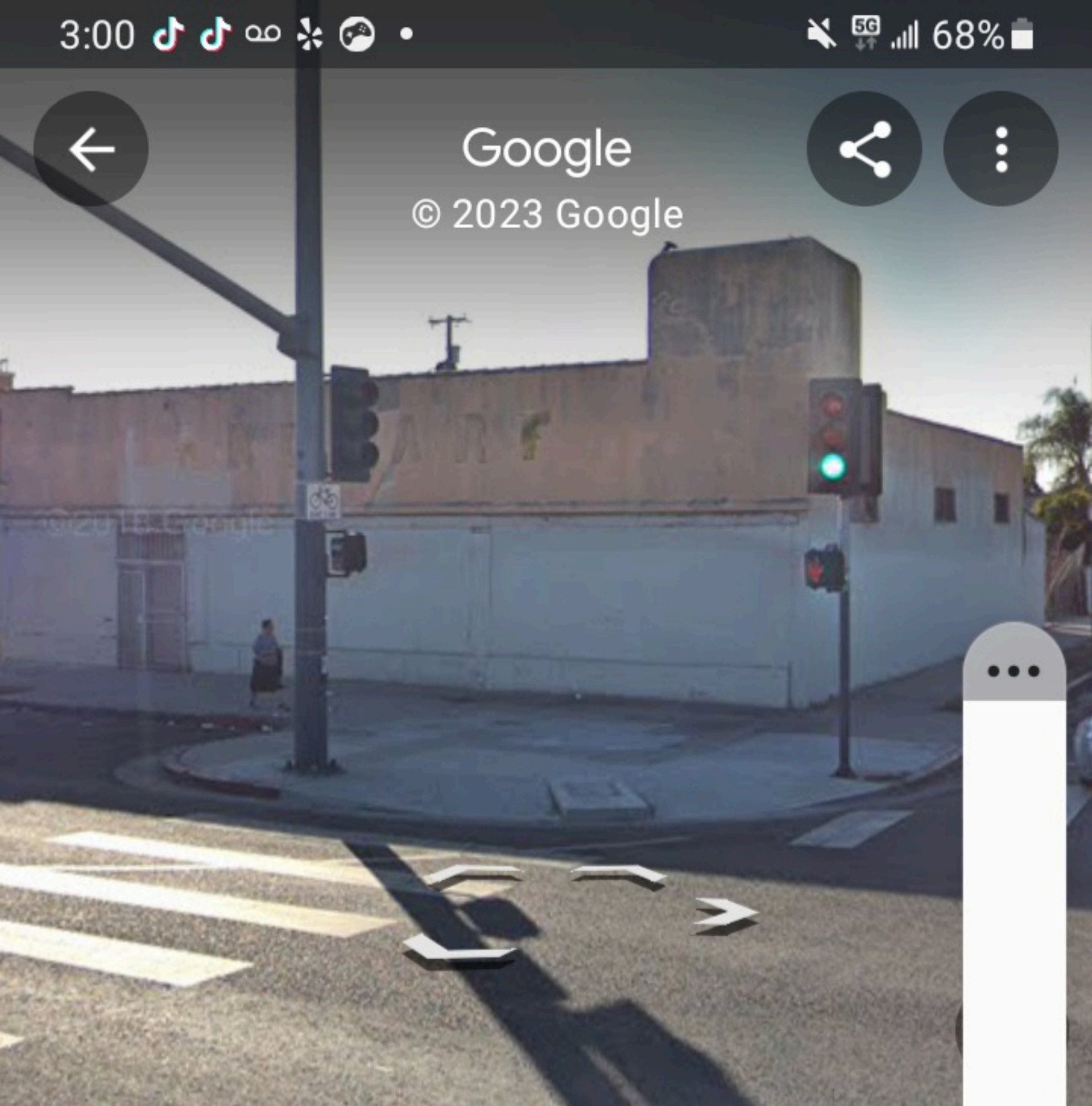








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DAY OF HEARING SUBMISSIONS

September 1, 2023

The Honorable South Los Angeles
Area Planning Commission of the City of Los Angeles
Los Angeles City Hall, Room 1070
200 N. Spring Street
Los Angeles, California 90012

Attn: Neverly Ann Hill, Commission Executive Assistant
apcsouthla@lacity.org

**Re: University of Southern California University Park Campus Specific Plan and
Development Agreement**

Dear Commissioners:

Service Employees International Union Local 721 (SEIU) and USC Forward submitted letters respectively dated June 16, 2023, to the South Los Angeles Area Planning Commission (APC). These letters make unsubstantiated claims that the University has not complied with the University of Southern California University Park Campus Specific Plan (Specific Plan) and associated Development Agreement (DA). We are writing to provide brief responses to each of these claims.

1. Parks Programming. The letters maintain that the University has not complied with DA Section 3.1.3.11, which requires the University to expend or contribute resources of equivalent value to, a minimum of \$10,000 dollars annually for the term of the DA. The University has complied with this requirement by contributing \$10,000 or more to parks programming in the area or making direct payments to the City Department of Recreation and Parks.

In the letter of determination dated March 31, 2023 (Compliance Review LOD), the Director of City Planning (Director) found that while the University had not made this payment for the 2021-2022 years, “the Public Parks programming partnership has been severely limited by COVID 19 and associated restrictions, which constitute enforced delay under DA Section 6.4.”

The letters claim that COVID-19 does not constitute enforced delay. Clearly, it was not possible for the University to continue to implement its parks programming at local parks due to COVID-19 restrictions. In any event, the University made the \$10,000 payment for the 2021-2022 annual compliance period on May 8, 2023.

The letters also maintain that the University did not comply with DA Section 3.1.3.11 in prior annual DA compliance periods. However, the Director found that the University complied with this requirement in each such compliance period. The time to challenge this determination has long since passed.

2. Expansion of Shuttle Service. The letters claim that the University has not complied with DA Section 3.1.3.19, which requires the University to extend the existing USC tram service to provide connectivity between the surrounding community and the new University Village. As set forth in the Compliance Review LOD, LADOT determined that the University's expanded tram services satisfies this requirement.

DA Section 3.1.3.19 does not require the University to maintain the same tram service routes in perpetuity, and the University has adjusted routes from time to time based on demand. However, the tram service has been expanded as compared to the service in operation as of the effective date of the DA. Therefore, as set forth in the Compliance Review LOD, the Director determine that the University is in compliance with Section 3.1.3.19. This determination

is final and cannot be appealed.

3. Demolition of Existing On-Campus Housing. The letters also express concern over the demolition of certain structures on the campus (Flour Tower, Trojan & Marks Residence). However, this demolition was permitted under the Specific Plan and analyzed in the EIR.

4. Increased Student Enrollment. The enrollment numbers in the letters include all full-time, part-time, and remote learning students at all the University's campuses and therefore do not accurately reflect the actual enrollment at the University Park Campus. While the number of students at this campus has increased over time, the Specific Plan was intended to facilitate this growth.

Crucially, there is no limit on enrollment in the Specific Plan. Moreover, the environmental analyses in the certified Specific Plan EIR were not based on the number of students, but on different metrics (e.g., number of dwelling units and square footage). The enrollment numbers cited in the letters are from a technical appendix to the EIR and were not used to assess environmental impacts. Therefore, any variation from those numbers would not affect the EIR's analyses or conclusions.

5. WIC Vouchers. The letters note that Target is not currently accepting Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) vouchers as set forth in DA Section 3.1.3.3. The Director found in the Compliance Review LOD that the University was not in full compliance with this section. Since that time, the University has worked diligently to get Target to accept WIC, and Target has agreed to begin accepting WIC vouchers by the end of next month.

6. Annual Parking Studies. The letters claim that the University has not submitted "annual parking studies". Section 10 of the Specific Plan requires the University to submit an updated Pooled Parking Inventory, not a parking study. In compliance with Section 10, the University has submitted an updated inventory annually, most recently in 2022. As this is a Specific Plan and not a Development Agreement requirement, this submittal was not mentioned in the Compliance Review LOD.

7. New Soccer/Lacrosse Stadium and New Building on Health Sciences Campus. The letters maintain that addenda to a prior certified EIR is not appropriate for a pending upgrade to the women's soccer and lacrosse stadium on the University Park Campus and a pending new research building on USC's Health Sciences Campus. The type of CEQA documentation for these projects is an issue for the Planning Department, not the APC.

8. Status of \$5M Housing Payment. The letters question the status of the \$5 million payment to the City for the Affordable Housing Trust Fund (AHFT) under Development Agreement Section 3.1.3.1.B. This payment was not due at the time the University submitted the last Development Agreement compliance report. However, the University has since made this payment to the AHFT on April 14, 2023, in compliance with Section 3.1.3.1.B. I am available to answer any questions.

Very truly yours,

I am available to answer any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read "Bryan D. Eck", with a stylized flourish at the end.

Bryan David Eck
Executive Director of Land Use & Planning

cc: Department of City Planning



Planning APC South LA <apcsouthla@lacity.org>

ADU Plans

Jose Sosa <jescososa@gmail.com>
To: apcsouthla@lacity.org

Sat, Sep 2, 2023 at 2:24 PM

Hello Los Angeles Planning Commission

This is Jose Escobedo, I am a homeowner in Los Angeles, who is seeking to build an ADU in my backyard. I have a garage in my backyard, which is an unpermitted adu. I am zoned R2 with 2 bus stations within .5 mile of my house. My address is 507 E 68st Los Angeles Ca 90003. I want to build 2 units in the back of 2 bed 1 bath. I wish to see how can I make this happen. I have had 4 contractors give me a information and quotes on how to build this up. I want to ask you directly what's the possible way to do this.