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

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If you 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

DAY OF HEARING SUBMISSIONS

MAR 13 2024

CITY PLANNING DEPT.
AREA PLANNING COMMISSION

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cumulative impact

The cumulative impact of more than a dozen projects must also be considered. This project on its own will drive displacement based on its size, location and final rental rates. The 1980 foot rent burden impact buffer is the typical distance for the walkability of a neighborhood. Visualize the cumulative effect of these projects being tracked and other just outside the buffer (Figure 02).

- 317 North Chicago Street 02 units newly renovated and zero affordable are directly behind the proposed Cesar Chavez Tiao project.

- 323 North Chicago Street (housing demolished and tenants evicted years before) vacant/infill to build 04 market rate units and zero affordable housing.

- 327 North Chicago Street demolish 6 units of Naturally Occurring Affordable Housing (NOAH)⁽⁰⁸⁾ and replace with two duplexes or 04 units of luxury housing. Zero affordable housing.

- 356 North Chicago Street demolished a single family home and replace with two story duplex or 02 home luxury subdivision. Zero affordable housing and also behind the Tiao site project.

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- 121 North Mathews Street 2 NOAH units demolished for 40 unit affordable housing at 8 units Mi and 32 units Li. As we argue further down Medium income and Low Income are too high for our community and these are the equivalent of market rate.

on the periphery

- 1016 State Street demolished 4 NOAH and replaced with 85 market rate units outside the buffer, 08 affordable units.

- 1126 Cornwell Street with 4 story, 31 market rate units, no affordable, demolished approximately 8 RSO units on two parcels.

- 1400 North Soto Street, 12 market rate units, no affordable, demolished 4 RSO units/NOAH and a corner store business.

- 2505 East Pomeroy at Soto Street demolish commercial and build 81 room Hilton Hotel and restaurant.

- 2842 Wabash Street and Evergreen displacing two businesses and parking is zero capacity revealed a parking study. The 55 units are Mi and Li and not affordable by the community. This is an ED1 project and cannot make public comment on or influence.

- 2528 East First Street demolishing 1 retail store and 2 NOAH units and replacing with 4 story, 51 unit building. Affordability NOT listed.

- 205 South State Street 4 families displaced from bungalow style building and replaced with a three story, 4 home small lot subdivision.

- 125 North Baily Street infill, 60 unit 100% affordable housing including undetermined mixed income housing.



displacement study
cumulative impact

Even though some sites are 100% affordable, the AMI is too high for the community⁽⁰⁴⁾ or there is not enough to make an impact. There will be no net gain of affordable or rent controlled units.

**** Note. INDIRECT DISPLACEMENT IS ALREADY OCCURRING.** The previously mentioned median income has risen from \$33,235⁽⁰⁶⁾ to \$51,389^(06A). There are no discernable growth industries in the area creating jobs. We contend that the income shift is from residents forced to migrate and being replaced by new more affluent residents seeking value.



(Figure 02) Data from "Community View" can be found in the yellow 1980 foot impact buffer⁽⁰⁵⁾. Turquoise polygons are the project site and other lands owned by the developer adjacent to the project. Targets are the projects listed above as "cumulative" or periphery. The two magenta impact buffers are 660 foot and 1230 respectively.

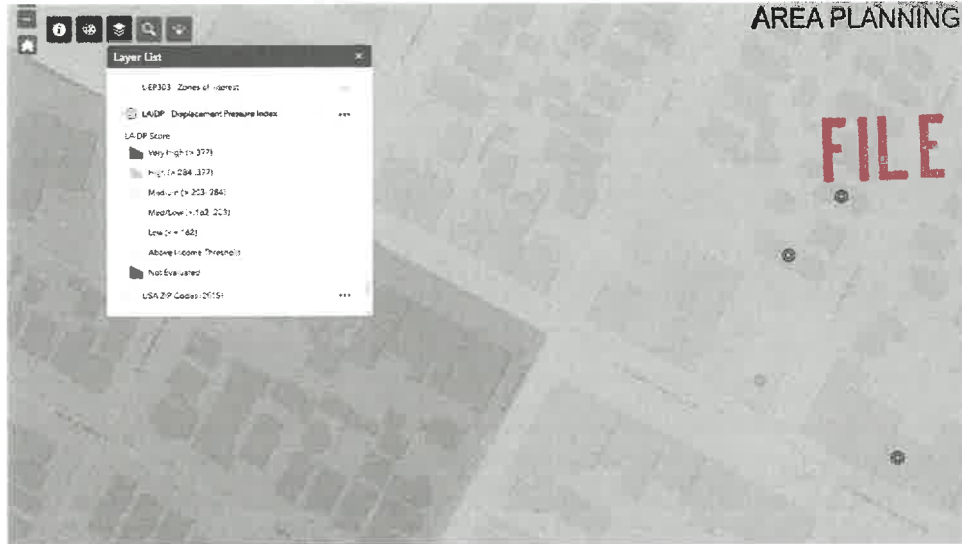
significant effect

Indirect displacement outcomes are difficult to quantify, but we can estimate impacts on vulnerable populations. We are already seeing the effect in the shift in income. The gentrification cluster, cumulative effect and the wealth and resource disparity will lead to forced economic migration. We also offer the City of Los Angeles Displacement Index⁽⁰⁹⁾ (Figure 03) The Tiao project sits in a high threat area, but is close enough to a very high displacement threat area that it is notable to consider.

MAR 13 2024

CITY PLANNING DEPT.
AREA PLANNING COMMISSION

city of los angeles index of displacement pressure



(Figure 03) From the Los Angeles Displacement Pressure Index. Tiao sits in a high threat, but close enough to a very high threat to be considered more seriously. The Index measures seven metrics: Rail station distance; Distance to rail stations under construction; Rapidly changing neighborhoods index; Change in housing prices; Displacement pressure factors that include renter population, rent burden and affordable housing covenant expirations.

Some of the biggest impacts are the least seen. The health costs of gentrification and displacement leave scars for generations. The CDC warns of the psychological and health traumas that come with the effects of gentrification⁽¹⁰⁾. The traumas associated with displacement are well documented by Dr. Fulilove as “root shock”. Families displaced from their home and communities lose networks that offer everything from childcare to finance and emotional support. Families are left unable to overcome the traumas of poverty when displaced and the traumas are passed on to then next generation. Within the Tiao buffer that is a quarter of the population or 2900 people that are the most vulnerable living below the poverty line in this densely populated neighborhood.

historic corridor

We believe there should be a moratorium on development and demolition until the historic resources of the community can be catalogued and valued by the community. We run the risk of losing the Boyle Heights and Eastside’s cultural resources if not done correctly. We are in the middle of the Boyle Heights Community Plan process and many new ideas are being developed, including a new income designation “Acutely Low Income” that ranges from \$10,350 to \$19,450. The current Boyle Heights Community Plan also offers us guidance.



displacement study los angeles displacement pressure

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CITY PLANNING DEPT.
AREA PLANNING COMMISSION

community plan

Despite community plan updates, the Boyle Heights Community Plan still affords basic rights to the community that include the following. 1) Section I-4 states the need to "provide more affordable housing". As discussed above this project does not overcome its displacement threat.

The Boyle Heights Community Plan also states on I-9 that development must, "Preserve the existing low scale character of the community." and "Preserve the continuity of the streetscape and enhance community identity." As well as "mitigate the adverse impacts of new high density residential development such as bulk, open space and parking."

The III-2 of the Boyle Heights Community Plan, that High-Medium density housing be provided only within a 1/4 mile radius from proposed Metrorail Station stops. This Project exceeds the distance and the density should not have been approved.

The categorical exemption was improperly issued due to the community's already limited parking availability. The Boyle Heights Community Plan has already recognized this problem. The project offers 40 multiple bedrooms for affluent families, but less than 1 parking space per unit.

In addition many of these issues are reiterated in the Eastside Adelante Redevelopment Project⁽¹²⁾. The Project Objectives state under Housing 13) promote housing in a "wide range of types, prices and rent levels"; Housing 14) Develop "sound residential neighborhoods" which translate to stable markets. Commercial 15) promote the "conservation of existing commercial uses through rehabilitation and revitalization..."

legacy of displacement

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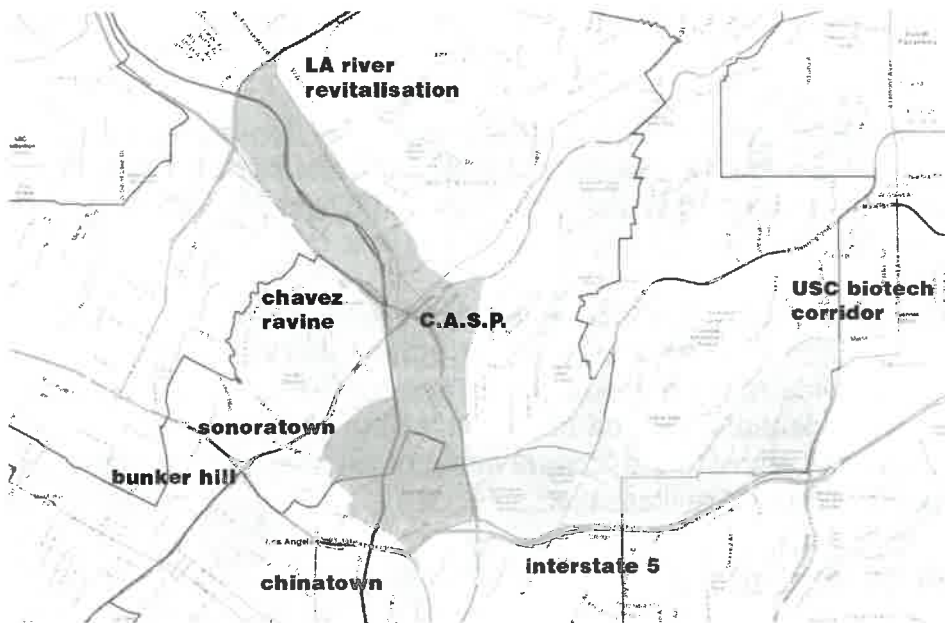


boyle heights community plan

displacement study

FILE COPY

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(Figure 04) The lime green was the proposed USC biotech corridor that extended from CSULA to USC. Purple is LA river and the Cornfield Arroyo Specific Plan CASP is 900 acres between the river and the Biotech.

Deny the CEQA Exemption based on the harm and cumulative impact this project will have on this marginalized community.

Sincerely,



John Urquiza, Northeast LA Alliance

MAR 13 2024

CITY OF LOS ANGELES DEPT.
AREA PLANNING & COMM. DIVISION



displacement study

community view & resources

community view⁽⁰⁵⁾

There are two views, the Boyle Heights macro view and the 1990 foot buffer (Figure 02) which looks at a project as an impact epicenter. We use this buffer in our methodology to reveal hyper local facts that point to more direct impacts. In this buffer these neighborhood facts are evident:

- 36% of the households are single parent families
- 25% single female parents who are high risk due to gender inequalities
- 2510 total households
- 11664 total buffer population
- 75% household net worth below \$49,000
- 57% household net worth below \$15,000
- 73% latinx/chicano
- 4% indigenous
- 2% black
- 25% living in poverty (9% national average)
- 82% renter occupied or 2,058 households at risk of indirect displacement

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boyle heights view^(06/06A)

14,229 people per square mile among the highest densities in the city
94% Latinx/Chicano
\$33,235 median income **(\$1,389)

This building does NOT belong on Cesar Chavez and should be moved to a more affluent neighborhood. The median income of **\$33,235 shows that half the community cannot afford these units. With only four affordable units at VLi the Tiao project has no net gain in affordable units in the community versus the indirect displacement it will cause.

indirect displacement

Tiao is already displacing families and businesses in the community by illegally using the Ellis Act, but indirect displacement⁽⁰⁷⁾ occurs when land values rise with affluent investment, this leads to increased rents as illustrated in the "Gentrification Cluster" case of Cinco Puntos. Eventually it creates a forced economic migration or displacement for those most vulnerable. This project is already directly displacing four legacy businesses and three families. There are no right of return considerations, there are no relocation funds for the families of the RSO units. All displacement will be amplified by the cumulative impacts as the effects ripple through the community.



resources

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(02) Survey of unit size and community comparison.

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(03) Zillow rent search for Boyle Heights examined 1100 SQF units and above. The average was \$2.81 per SQF.

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(04) HUD affordable housing income limits

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(06) Boyle Heights view.

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CITY OF LOS ANGELES

MAR 13 2024

CITY PLANNING DEPT.
AREA PLANNING COMMISSION



displacement study

gentrification clusters

/// appellant support: viva padilla

East Los Angeles Planning Commission
City of Los Angeles Planning Department
201 North Figueroa Street
Los Angeles, CA 90012

FILE COPY

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apceastla@lacity.org

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rearte.centro.la@gmail.com, bijan.ghaemi@gmail.com

re: DIR-2021-8626-RDP-HCA-1A, ENV-2021-8628-CE (2115-2121 East
Cesar Chavez Avenue, 301 North Chicago Street)

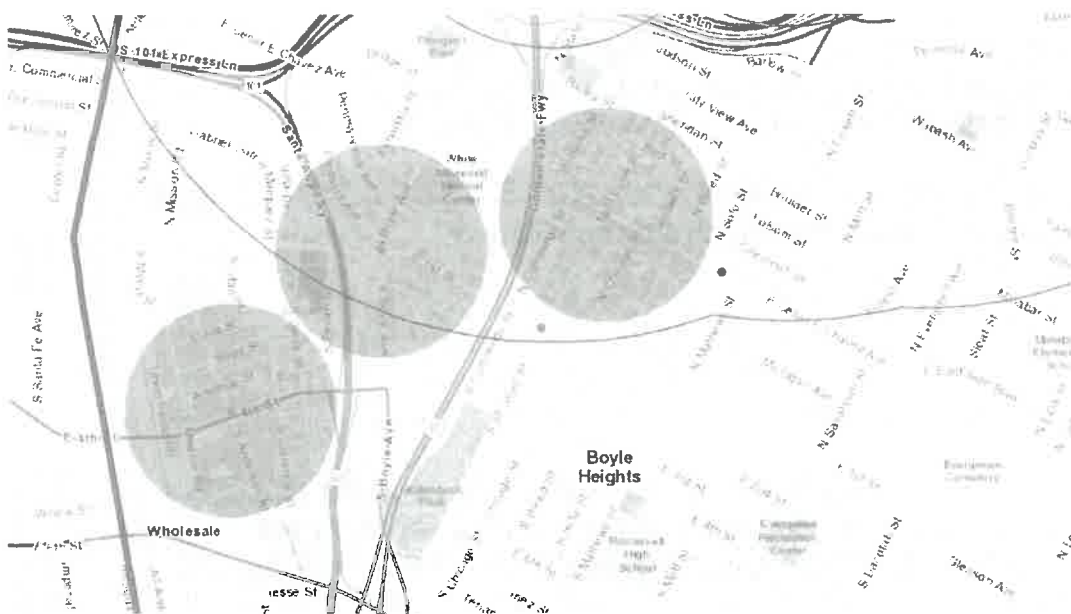
To Whom it May Concern:

We submit the following for the record to show the negative impact this project will have on the community. These findings will show this project is not exempt from the CEQA and the appeal by residents must be recognized.

gentrification cluster

In our community engaged research the "Gentrification Cluster" is a methodology we use as a predictive model. We are observing NEW businesses that reflect at least three or more of the following to indicate future investment: a) Hi end retail including art galleries. b) Culturally inappropriate retail with a high price point, aka coffee shops, gift stores that do not reflect the existing community. c) New housing above the median costs or luxury lofts and luxury subdivisions. The "Gentrification Cluster" indicates the first sign of changes to a community. The harm is relative to its impact. In a Lincoln Heights study we found that after being identified as a cluster, tenants in five buildings adjacent to "Cinco Puntos" had their rents increased nearly 35%, which eventually led to the formation of the Cinco Puntos Tenants Union and a \$5 million lawsuit against the landlord. In the Cesar Chavez Cluster businesses we have La Monarca, while a culturally appropriate, price points are almost 200% higher versus other

similar businesses; Guisados also culturally appropriate is another business with 8 locations in affluent neighborhoods and a high price point; Weird Wave Coffee is just outside the cluster who's Yelp page has some negative comments about their high pricing; City of Angels Tattoo is a controversial metric, but often represents a cultural shift and not necessarily an economic shift; the final metric are two market rate housing developments on Chicago Street which will be added to the cumulative impact discussed below. While these businesses' impact the community in a small way, the aggregate represents a trend for the in migration of affluence. Now the most visible is the Tiao development just a few parcels away from the original epicenter.



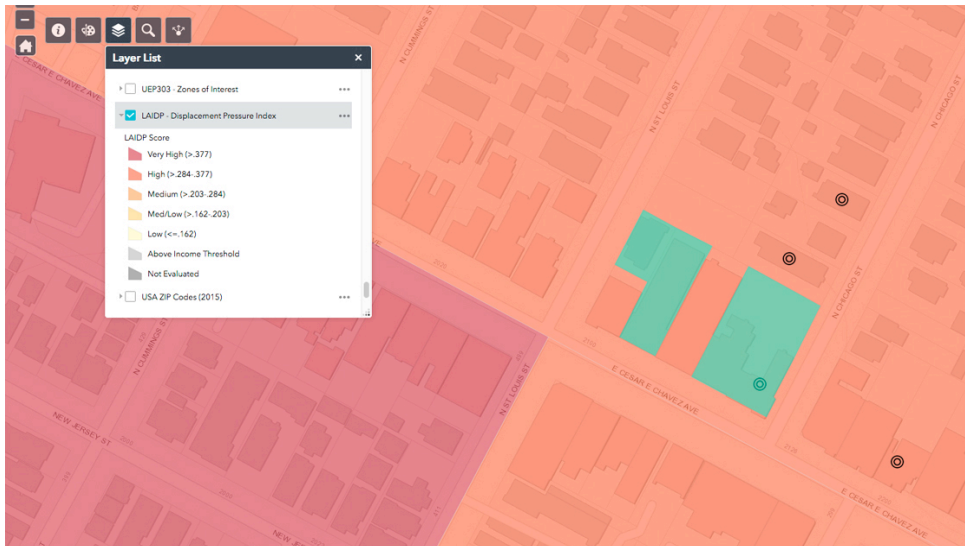
(Figure 01) The right cluster or buffer is centered on Guisados which is the same block as the Tiao Project. The light turquoise indicates both of Tiao's holdings in the neighborhood. Other orange points represent potential clusters missing 1 or 2 qualifying businesses.

The total investment for the Tiao is estimated at \$33,000,000⁽⁰¹⁾. In a unit-by-unit comparison, 62% of the units average 1370 SQF per unit. Those units are 54% larger than the average unit size on Chicago Street⁽⁰²⁾. The average Tiao unit of 1370 SQF will rent for \$3849 per month⁽⁰³⁾. Using HUD methodology of 30% of one's income should go towards housing, we extract that to live at Tiao you need to earn at least \$156,000 per year to afford the majority of those units. The Tiao is also proposing five affordable units at Extremely Low Income (ELI), which for a family of 4 the income threshold is \$37,850⁽⁰⁴⁾. Four units will NOT offset the potential threat to the stability of the neighborhood housing stock.



los angeles displacement pressure

city of los angeles index of displacement pressure



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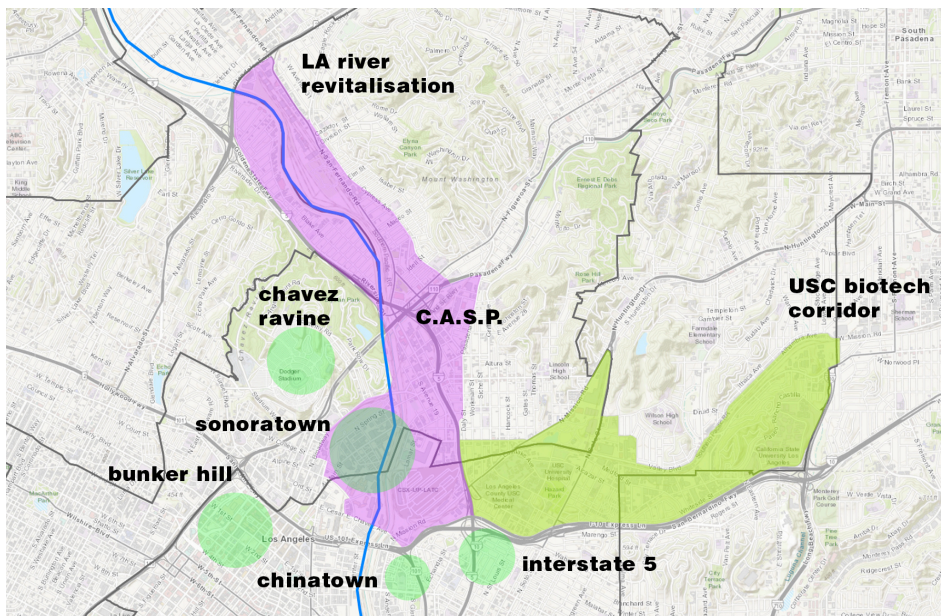
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- 356 North Chicago Street demolished a single family home and replace with two story duplex or 02 home luxury subdivision. Zero affordable housing and also behind the Tiao site project.

- Application was filed for the most dubious 2141 Cesar Chavez. Xola plans for ten story building with 100% affordability, unfortunately it is only 19 units and 7 floors museum space, project will demolish approximately 8 legacy business and represents an economic and cultural shift if not greater than the Tiao then equal to.

- 121 North Mathews Street 2 NOAH units demolished for 40 unit affordable housing at 8 units Mi and 32 units Li. As we argue further down Medium income and Low Income are too high for our community and these are the equivalent of market rate.

on the periphery

- 1016 State Street demolished 4 NOAH and replaced with 85 market rate units outside the buffer, 08 affordable units.

- 1126 Cornwell Street with 4 story, 31 market rate units, no affordable, demolished approximately 8 RSO units on two parcels.

- 1400 North Soto Street, 12 market rate units, no affordable, demolished 4 RSO units/NOAH and a corner store business.

- 2505 East Pomeroy at Soto Street demolish commercial and build 81 room Hilton Hotel and restaurant.

- 2842 Wabash Street and Evergreen displacing two businesses and parking is zero capacity revealed a parking study. The 55 units are Mi and Li and not affordable by the community. This is an ED1 project and cannot make public comment on or influence.

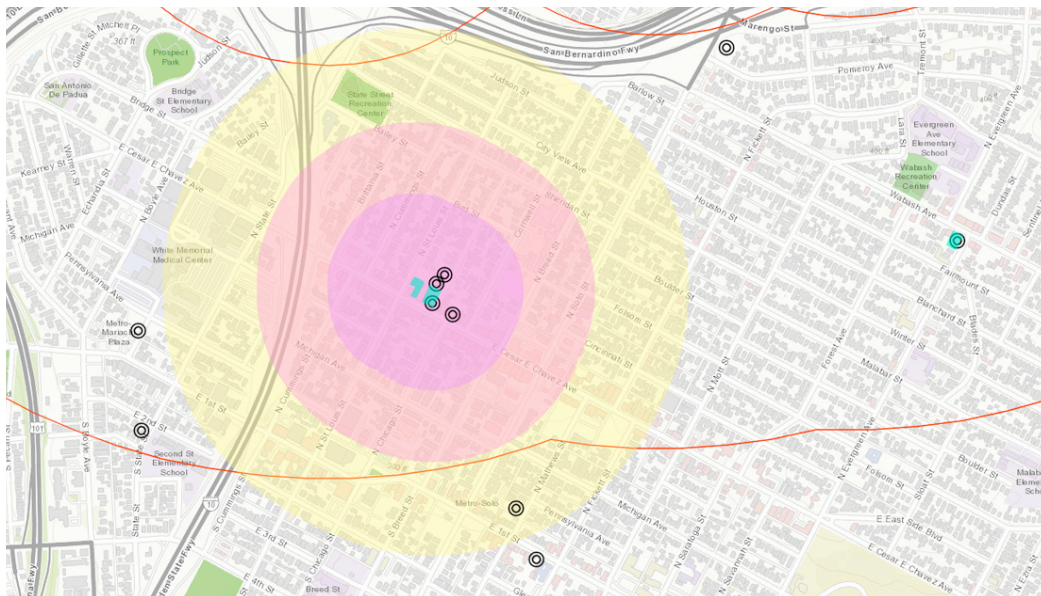
- 2528 East First Street demolishing 1 retail store and 2 NOAH units and replacing with 4 story, 51 unit building. Affordability NOT listed.

- 205 South State Street 4 families displaced from bungalow style building and replaced with a three story, 4 home small lot subdivision.

- 125 North Baily Street infill, 60 unit 100% affordable housing including undetermined mixed income housing.

Even though some sites are 100% affordable, the AMI is too high for the community⁽⁰⁴⁾ or there is not enough to make an impact. There will be no net gain of affordable or rent controlled units.

**** Note. INDIRECT DISPLACEMENT IS ALREADY OCCURRING.** The previously mentioned median income has risen from \$33,235⁽⁰⁶⁾ to \$51,389^(06A). There are no discernable growth industries in the area creating jobs. We contend that the income shift is from residents forced to migrate and being replaced by new more affluent residents seeking value.



(Figure 02) Data from “Community View” can be found in the yellow 1980 foot impact buffer⁽⁰⁵⁾. Turquoise polygons are the project site and other lands owned by the developer adjacent to the project. Targets are the projects listed above as “cumulative” or periphery. The two magenta impact buffers are 660 foot and 1230 respectively.

significant effect

Indirect displacement outcomes are difficult to quantify, but we can estimate impacts on vulnerable populations. We are already seeing the effect in the shift in income. The gentrification cluster, cumulative effect and the wealth and resource disparity will lead to forced economic migration. We also offer the City of Los Angeles Displacement Index⁽⁰⁹⁾ (Figure 03) The Tiao project sits in a high threat area, but is close enough to a very high displacement threat area that it is notable to consider.



/// appellant support: viva padilla

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re: DIR-2021-8626-RDP-HCA-1A, ENV-2021-8628-CE (2115-2121 East
Cesar Chavez Avenue, 301 North Chicago Street)

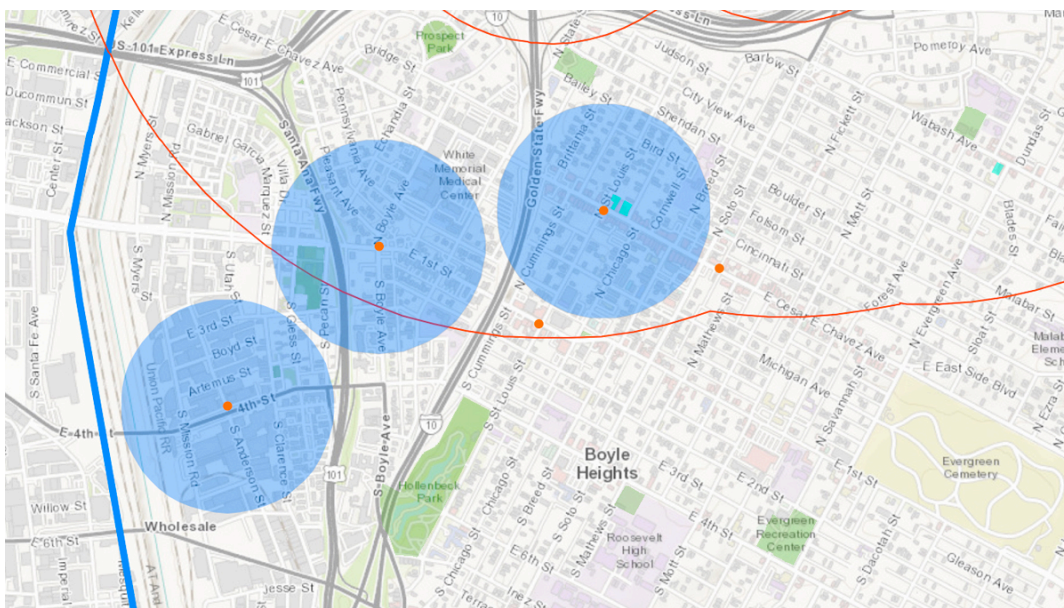
To Whom it May Concern:

We submit the following for the record to show the negative impact this project will have on the community. These findings will show this project is not exempt from the CEQA and the appeal by residents must be recognized.

gentrification cluster

In our community engaged research the “Gentrification Cluster” is a methodology we use as a predictive model. We are observing NEW businesses that reflect at least three or more of the following to indicate future investment: a) Hi end retail including art galleries. b) Culturally inappropriate retail with a high price point, aka coffee shops, gift stores that do not reflect the existing community. c) New housing above the median costs or luxury lofts and luxury subdivisions. The “Gentrification Cluster” indicates the first sign of changes to a community. The harm is relative to its impact. In a Lincoln Heights study we found that after being identified as a cluster, tenants in five buildings adjacent to “Cinco Puntos” had their rents increased nearly 35%, which eventually led to the formation of the Cinco Puntos Tenants Union and a \$5 million lawsuit against the landlord. In the Cesar Chavez Cluster businesses we have La Monarca, while a culturally appropriate, price points are almost 200% higher versus other

similar businesses; Guisados also culturally appropriate is another business with 8 locations in affluent neighborhoods and a high price point; Weird Wave Coffee is just outside the cluster who's Yelp page has some negative comments about their high pricing; City of Angels Tattoo is a controversial metric, but often represents a cultural shift and not necessarily an economic shift; the final metric are two market rate housing developments on Chicago Street which will be added to the cumulative impact discussed below. While these businesses' impact the community in a small way, the aggregate represents a trend for the in migration of affluence. Now the most visible is the Tiao development just a few parcels away from the original epicenter.



(Figure 01) The right cluster or buffer is centered on Guisados which is the same block as the Tiao Project. The light turquoise indicates both of Tiao's holdings in the neighborhood. Other orange points represent potential clusters missing 1 or 2 qualifying businesses.

The total investment for the Tiao is estimated at \$33,000,000⁽⁰¹⁾. In a unit-by-unit comparison, 62% of the units average 1370 SQF per unit. Those units are 54% larger than the average unit size on Chicago Street⁽⁰²⁾! The average Tiao unit of 1370 SQF will rent for \$3849 per month⁽⁰³⁾. Using HUD methodology of 30% of one's income should go towards housing, we extract that to live at Tiao you need to earn at least \$156,000 per year to afford the majority of those units. The Tiao is also proposing five affordable units at Extremely Low Income (ELI), which for a family of 4 the income threshold is \$37,850⁽⁰⁴⁾. Four units will NOT offset the potential threat to the stability of the neighborhood housing stock.

Appellant Viva padilla

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Cultural-Historic Importance

The building located at 2115 where El Apetito is currently located is a cultural-historic resource. The restaurant is prominently displayed in the Latino/Chicano classic film *Blood In, Blood Out*, at the 1:43:00 mark the main characters are talking about the significance of the neighborhood and the people who live & work there.

<https://youtu.be/2JRkw6U688U?si=QeE44GKCz5TzziOG&t=6200>



Exide Contamination Radius Controversy

There are many local organizations that are pushing for the expansion of the testing radius for lead contamination relating to Exide that feel like the current radius is too narrow and that the State of California hasn't done enough to look at the full extent of the 75 years of Exide pollution. Organizations include KECK USC, East Yard Communities for Environmental Justice, and SELA

EAST YARD COMMUNITIES FOR ENVIRON JUSTICE:

<https://eycej.org/index.php/campaigns/exide-technologies-inc/>

<https://www.latimes.com/california/story/2023-02-10/exide-lead-cleanup-leaves-fear-and-frustration-in-its-wake>

SELA YOUTH JUSTICE:

<https://www.selacollab.org/spotlighteastyard/>

MORE EXPANSION NEEDED:

<https://www.latimes.com/local/lanow/la-me-ln-exide-schools-parks-20161117-story.html>

ABOUT EXIDE CONTAMINATION:

<https://laist.com/news/climate-environment/southeast-la-baker-lawsuit-vernon-smell-environment-exide-community-odors>