Appendix A

NOP and Responses

DEPARTMENT OF
CITY PLANNING

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NOTICE OF PREPARATION OF A COMBINED DRAFT ENVIRONMENTAL IMPACT REPORT AND NOTICE OF SCOPING MEETING FOR UPDATES TO THE CENTRAL CITY AND CENTRAL CITY NORTH COMMUNITY PLANS, AND AMENDMENTS TO THE CITY OF LOS ANGELES MUNICIPAL CODE TO ADOPT A NEW ZONING CODE FOR THE CENTRAL CITY AND CENTRAL CITY NORTH COMMUNITY PLAN AREAS (AS PART OF THE *RE:CODE LA* PROJECT)

TO: Agencies, Organizations, and Interested Parties **DATE: February 6, 2017**

The City of Los Angeles Department of City Planning (DCP), as the Lead Agency under the California Environmental Quality Act (CEQA), will prepare an Environmental Impact Report (EIR) for a Project to: (1) update the Central City Community Plan and the Central City North Community Plan (Downtown Plans), (2) amend the City of Los Angeles Municipal Code (LAMC) to adopt new zoning regulations for the Downtown Plan Area as part of the **re:code LA** program (Downtown Zoning Code); and (3) make all other necessary amendments to the Framework Element, Mobility Plan, and other General Plan elements, specific plans, the LAMC, and other ordinances to implement the above.

More details on the Project are provided below. The City is requesting identification of environmental issues and information that you or your organization believes should be considered in the EIR.

NOTICE OF SCOPING MEETING

Pursuant to California Public Resources Code Section 21083.9 and California Code of Regulations, Title 14 ("CEQA Guidelines") Section 15082, the Lead Agency will conduct a scoping meeting for the purpose of soliciting oral and written comments from interested parties requesting notice, responsible agencies, agencies with jurisdiction by law, trustee agencies, and involved federal agencies, as to the appropriate scope and content of the EIR.

SCOPING MEETING

Date: Thursday, February 16, 2017
Time: 5:00 PM - 7:00 PM
Place: Caltrans District 7 Building – Conference Room #01.037
100 S. Main St.
Los Angeles, CA 90013

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate. The meeting facility and its parking are wheelchair accessible. Sign language interpreters, assistive listening devices, or other auxiliary aides and/or services may be provided upon request. Other services, such as translation between English and other languages, may also be provided upon request. To ensure availability of services, please make your request no later than three working days (72 hours) prior to the meeting calling Tal Harari at (213) 978-1204.

RESPONSIBLE AND TRUSTEE AGENCIES

The City requests your agency's views on the scope and content of the environmental information relevant to your agency's statutory responsibilities in connection with the Project, in accordance with the CEQA Guidelines, Section 15082(b). Your agency will need to use the EIR prepared by the City when considering any permits or other project

approvals that your agency must issue. As such, your responses to this Notice of Preparation (NOP), at a minimum should identify: (1) The significant environmental issues and reasonable alternatives and mitigation measures that your agency will need to have explored in the EIR; and (2) Whether your agency will be a responsible or trustee agency for this project.

REVIEW AND RESPONSE PERIOD

February 6, 2017 to March 6, 2017.

Pursuant to CEQA Guidelines, Section 15082(b), responses to this NOP must be provided during this response period.

PROJECT LOCATION

The Project location is the Central City Community Plan Area and the Central City North Community Plan Area ("Downtown Plan Area" or "Project Area"). The Downtown Plan Area is geographically contiguous, sharing a common boundary along Alameda Street. The Central City Community Plan Area is comprised of approximately 2,161 acres, and is generally bounded on the north by Sunset Boulevard/Cesar Chavez Avenue, on the south by the Santa Monica Freeway (Interstate 10), on the west by the Harbor Freeway (Interstate 110), and on the east by Alameda Street. Immediately to the east of Alameda Street is the Central City North Community Plan Area. The Central City North Community Plan Area is comprised of approximately 2,005 acres, and is generally bounded on the north by Stadium Way, Lilac Terrace, and North Broadway, on the south by the City of Vernon, on the west by Alameda Street, and on the east by the Los Angeles River. The Project Area is bordered by the communities of Boyle Heights, Silver Lake-Echo Park, Westlake, Southeast and South Los Angeles, and the City of Vernon. The Downtown Plan Area boundaries are shown in **Figure 1**. The Downtown Plan Area is shown within a regional context in **Figure 2**.

PROJECT BACKGROUND

The Central City and Central City North Community Plans are two of 35 Community Plans, which comprise the Land Use Element of the City's General Plan. The Land Use Element is one of the seven State-mandated elements of the General Plan that also include open space, transportation, conservation, housing, noise, and safety. The Downtown Community Plans are being updated consistent with California Government Code Section 65302, which identifies the seven required elements of a General Plan. Community Plans are intended to promote an arrangement of land uses, streets, and services in the Project Area to encourage economic vitality, social and physical well-being, and promote the general health, safety, welfare and convenience of people who live and work in the Project Area.

The Project is part of the City of Los Angeles New Community Plan Program, a program to update each of the City's 35 Community Plans. The Central City Community Plan was last updated in 2001, and the Central City North Community Plan was last updated in 2000. Since then, substantial changes have occurred, most notably, completion of the Metro Gold and Expo Lines, and implementation of the Metro Bike share system; completion of large-scale commercial and residential developments; future plans and infrastructural improvements to be accommodated such as the Los Angeles Streetcar, Metro Regional Connector, and High Speed Rail; and new growth forecasts through the year 2040, released by the Southern California Association of Governments. As further described below, the Downtown Plans will rezone land in the Downtown Plan Area to make the Downtown Zoning Ordinance operative.

The Downtown Zoning Code is a portion of the **re:code LA** program. **re:code LA** is a program to comprehensively revise the City of Los Angeles Zoning Code. In summary, the **re:code LA** program will amend the text of the LAMC to replace the City's existing Zoning Ordinance (Chapter 1 of the LAMC) with a new City zoning ordinance (New Zoning Ordinance) and the community plan update process will apply the zoning regulations to land in the Project Area. The New Zoning Ordinance will include, among other provisions, new zone classifications and revised/reorganized development standards and requirements for those new zone classifications. The New Zoning Ordinance and zone classifications are further described below.

Based on the size and scale of the City and the current Zoning Ordinance, the **re:code LA** program is a relatively substantial undertaking. It is expected that parts of the **re:code LA** program will be adopted and implemented at different times. Specifically, the New Zoning Ordinance will not be adopted all at once and even when adopted, will not be made operative in all parts of the City all at once. Some elements of the New Zoning Ordinance that will be applicable citywide will need to be adopted to use the New Zoning Ordinance anywhere. These elements include definitions, administrative rules, and development standards. These elements will be adopted before or simultaneously with the first ordinance to implement the New Zoning Ordinance zone classifications. On the other hand, new zones (or zone module types, as further described below) are expected to be adopted at different times. Finally, even when the New Zoning Ordinance is adopted into the LAMC, none of the new zones, and their respective development standards and requirements, will be operative for any property in the City until that property is rezoned and the relevant community plan is amended to allow that new zoning classification. It is expected that rezoning and plan amendments to implement the New Zoning Code throughout the City will occur with Community Plan Updates or other citywide or area-wide planning and zoning efforts.

For this Project, the City expects to implement the **re:code LA** program in the Downtown Plan Area with a Downtown Zoning Code. The Downtown Zoning Code will include: (1) new zone classifications (or zone module types for zone classifications) for the Downtown Plans and Project Areas; and (2) if not previously adopted at the time of Project approval, those elements of the New Zoning Ordinance that are required to utilize the new zones, such as definitions and development standards, including standards that may be utilized citywide. The Project does not include rezoning land outside of the Downtown Plan Area or amending any community plans other than the Central City Community Plan and the Central City North Community Plan.

PROJECT DESCRIPTION

The proposed Project includes the updates to the Downtown Plans, adoption of the Downtown Zoning Code, and the adoption of necessary revisions and any other amendments necessary to implement the above, including amendments to other General Plan elements (such as, Mobility and Framework), the LAMC, specific plans, and other ordinances to implement those updates. The following describes in more detail the updates to the Downtown Plans and the adoption of the Downtown Zoning Code:

Downtown Plans

The updates to the Downtown Plans will reflect a future vision for Downtown, and are intended to guide development through the year 2040, and revise the existing Central City Community Plan and Central City North Community Plan. Community Plans are also intended to guide development by informing the general public of the City's broad planning goals, policies, and objectives, as well as specific development standards for the Project area. The Downtown Plans would allocate land for the range of uses that Downtown will need through 2040, including land for jobs, housing, parks and open space (as available and feasible), and civic functions, and would improve the link between land use and transportation in a manner that is consistent with the General Plan Framework Element. Collectively, the Downtown Community Plans' goals, objectives, policies, and programs articulate the policy direction that the City will promote for the duration of the Plans. It includes amending the Zoning Map to rezone the Project Area with new zone classifications developed for the Downtown Plans.

Downtown Zoning Code

As discussed above, the Project also includes the adoption of the Downtown Zoning Code. The Downtown Zoning Code refers to several amendments to the LAMC to implement the updates to the Downtown Plans and **re:code LA** in the Project Area.

The new **re:code LA** zoning system is modular. Zoning classifications require the bundling of several designations to make a zone. These designations include the following modules: Context, Form District, Frontage, and Use District.

The *Contex*t module is comprised of regulations meant to enhance the existing or establish new development patterns of an area where applied. Such Context regulations could include grading quantities, landscaping, and potentially new minimum parking requirements. Context also sets the range of Form Districts, and Frontages available for the area.

The *Form District* module governs the shape and size of buildings by regulating lot size and site coverage, building placement, bulk, and mass.

The *Frontage* module governs how a site or building addresses the street or right of way by regulating ground floor story height, the amount of transparency (such as windows) required, pedestrian entry requirements and spacing, and allowable building elements (such as canopies).

The *Use District* module establishes which uses and activities are allowed on a site. Each use will have a corresponding definition and any relevant standards, either maintained from the current Zoning Code or newly established standards.

In any community plan update, there are many potential combinations of Context, Form District, Frontage, and Use District module types that can be applied to properties to make a zone.

To implement the updates to the Downtown Plans and **re:code LA** in the Downtown Plan Area, certain Context, Form District, Frontage, and Use District module types are proposed to be added to the LAMC. These module types will be used for rezoning property in the Downtown Plan Area. As the system is modular, it is possible for some of these Context, Form District, Frontage, and Use District module types developed for the Downtown Zoning Ordinance to be used in other parts of the City in various combinations in the future when community plans are updated and properties rezoned.

If not already adopted at the time of Project approval, the Project will also include the adoption of citywide elements of the New Zoning Code, including: citywide development standards (such as parking stall dimensions, grading haul route standards, minimum pedestrian walkways, and others); definition of terms; rules of measurement (such as how to measure lot width and building height); possible land use incentive system(s), modifications to existing nonconforming provisions; maintenance of current rules for division of land; creation of new streetscape and maintenance of street improvement requirements; establishment of new overlay districts; and potentially new minimum parking requirements. These regulations will only be operative in other parts of the City when property is rezoned and other community plans are amended. This is expected to occur through future community plan updates.

Project Objectives
The primary objectives of the Project will be to:

- Ensure that Downtown can continue to grow in a sustainable, equitable, healthy, and inclusive manner;
- Reinforce the role of Downtown as the primary jobs center for the City, County, and the Southern California region;
- Expand and support a growing residential population;
- Celebrate and reinforce the character of each individual neighborhood;
- Promote a transit, bicycle, and pedestrian friendly environment; and
- Refine and expand a system that links development with public benefits to deliver community amenities in the Downtown Plan Area.

Elements of the proposed Project to implement these objectives include the following:

- Amend the text of the Downtown Plans to revise the stated plan policies and objectives;
- Amend the land use map of the Downtown Plans to implement the new policies and objectives, including amendments to establish plan consistency with the new Downtown Zoning Code zones;
- Adopt the Downtown Zoning Code;
- Amend the Zoning Map to rezone Downtown with new downtown zone classifications;
- Integrate regulations of the existing Specific Plans and Planning Overlays into the new Downtown Zoning Code; and
- Amend the General Plan Framework, Mobility Plan and other Citywide General Plan Elements, and ordinances, as necessary.

ISSUES TO BE ADDRESSED IN THE EIR

Based on the project description and the Lead Agency's understanding of the environmental issues associated with the Proposed Project, the following topics will be analyzed in the EIR:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation/Circulation
- Utilities, Energy and Service Systems

The EIR will analyze the reasonably foreseeable indirect physical changes to the environment in the above topic areas caused by the Project, including the updates to the Downtown Plans, the adoption of the Downtown Code, and any other necessary amendments to plans or the LAMC.

To the extent that the Downtown Zoning Code includes zoning module types or citywide standards and regulations that may in the future be used in other parts of the City, indirect impacts to the environment from those provisions is speculative. This is due to both the modularity of the system (zone module types can be combined to make many different zones) and the fact that none of the components of the new zoning will be available for use on a property until a community plan update or other planning process has introduced the new zones to an area. Additionally, as stated above, additional zoning classifications (ie.module types) will be created in the future through the **re:code LA** program to meet the needs of other parts of the City. Any application of any part of the Downtown Zoning Code outside of the Downtown Plan Area would require a Community Plan amendment, rezoning, and new environmental analysis. The EIR will consider and discuss whether any impacts from the use of the Downtown Zoning Code outside the Downtown Plan Area is reasonably foreseeable, and if so, the EIR will analyze those impacts.

Alternatives to be analyzed in the EIR are to be defined and analyzed consistent with the requirements of CEQA Guidelines, Section 15126.6. The specific alternatives to be evaluated in will include a "No Project" alternative, as required by CEQA, and may include alternative land use configurations.

DOCUMENT AVAILABILITY

The Notice of Preparation can be viewed on the Downtown Community Plan program website at: www.dtla2040.org. It can also be viewed on the City of Los Angeles Department of City Planning website at: www.planning.lacity.org. To locate a copy of the Notice of Preparation online, click on Environmental Review on the left side of the Department of City Planning website and then click on the Notice of Preparation & Public Scoping Meetings link.

SUBMITTAL OF WRITTEN COMMENTS

The Lead Agency solicits comments regarding the scope, content and specificity of the EIR from all interested parties requesting notice, responsible agencies, agencies with jurisdiction by law, trustee agencies, and involved agencies. Please send written/typed comments (including a name, telephone number, and contact information) to the following:

City of Los Angeles, Department of City Planning
ATTN: Bryan Eck, City Planner
Case Numbers: CPC-2017-432-CPU; ENV-2017-433-EIR
200 N. Spring Street, Room 667
Los Angeles, CA 90012

Phone: (213) 978-1304
Fax: (213) 978-1334
E-mail: bryan.eck@lacity.org

In accordance with CEQA Section 15082, this Notice of Preparation is being circulated for a 30-day comment period. The City of Los Angeles requests that written comments be provided at the earliest possible date, but no later than **5:00 p.m. on March 6, 2017.**

For more information about the Downtown Plans and Downtown Zoning Code, please visit http://dtla2040.org and http://recode.la/.

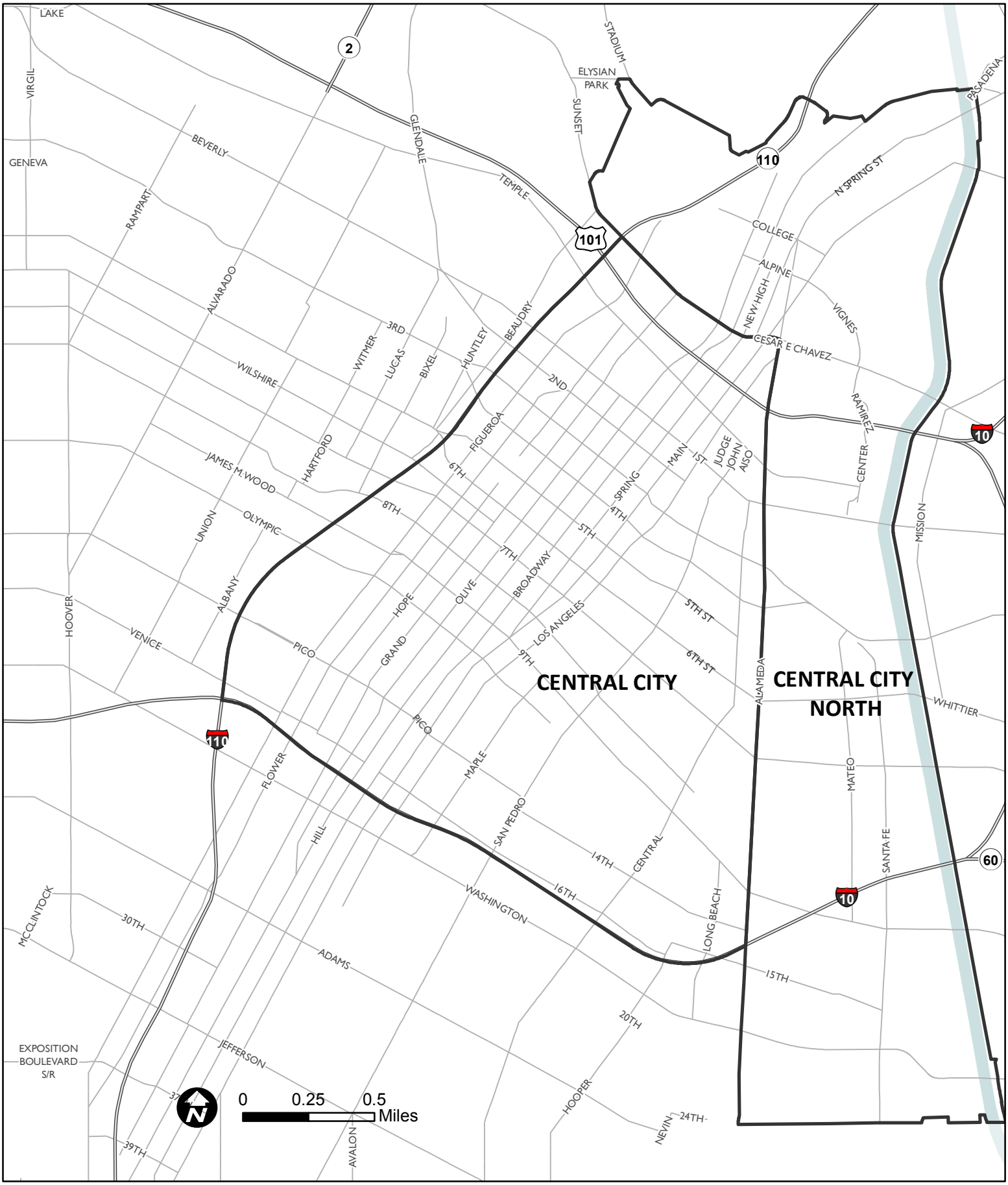
ALL INTERESTED PARTIES ARE INVITED TO ATTEND THE PUBLIC SCOPING MEETING TO ASSIST IN IDENTIFYING ISSUES TO BE ADDRESSED IN THE EIR. ATTENDEES WILL HAVE AN OPPORTUNITY TO PROVIDE INPUT TO THE CONSULTANTS PREPARING THE EIR.

Bryan D. Eck, City Planner
City of Los Angeles Department of City Planning

Attachments:
Figure 1: Downtown Plan Area Map
Figure 2: Regional Context Map

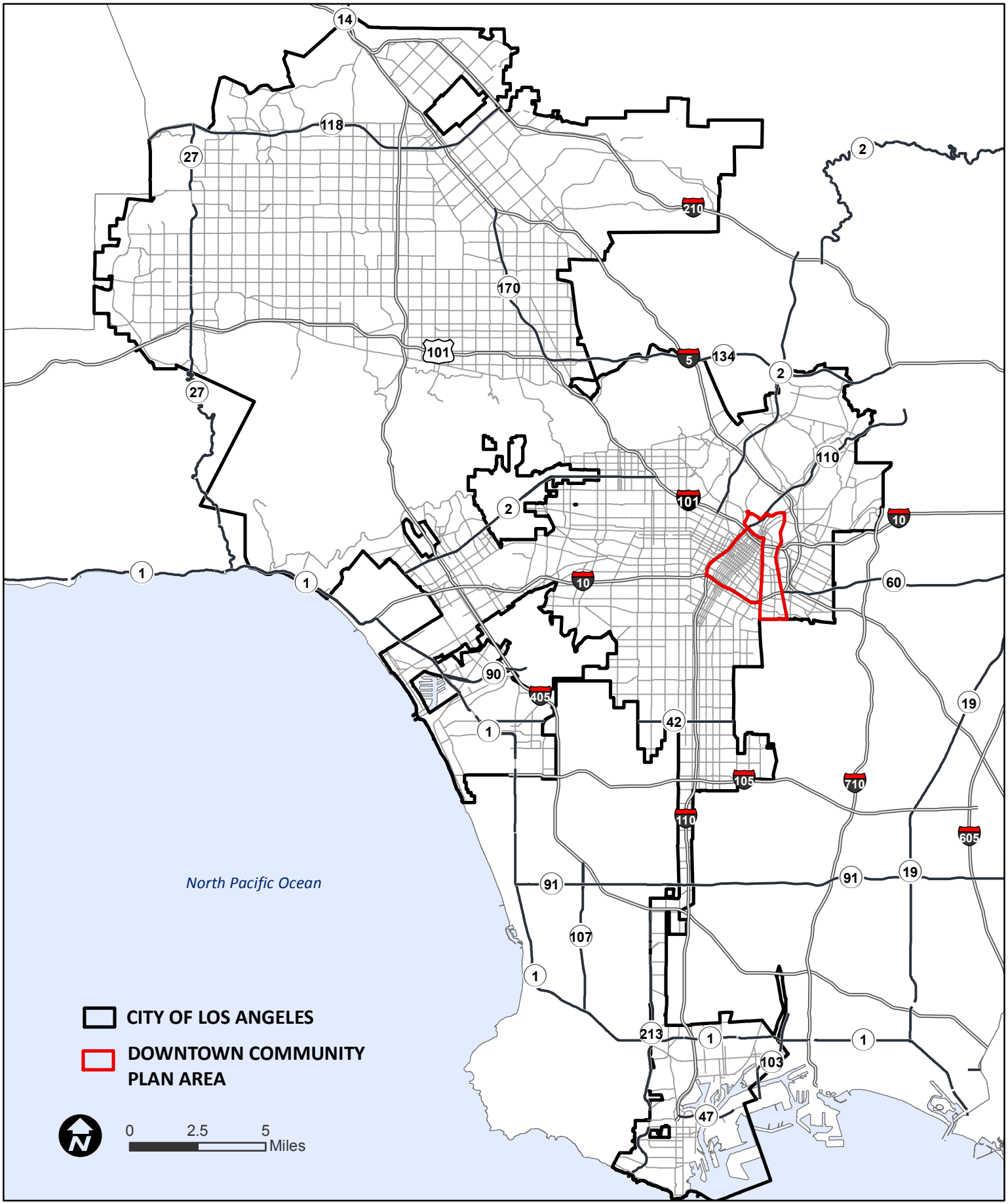
DOWNTOWN PLAN AREA MAP
CENTRAL CITY & CENTRAL CITY NORTH

FIGURE 1



DOWNTOWN PLAN AREA
REGIONAL CONTEXT MAP

FIGURE 2



Print Form

Appendix C

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

Project Title: Central City and Central City North Community Plan Update Environmental Impact Report

Lead Agency: City of Los Angeles — Contact Person: Bryan Eck

Mailing Address: 200 North Spring Street, City Hall, Room 525 — Phone: (213) 978-1304

City: Los Angeles — Zip: 90012 — County: Los Angeles

Project Location: County: Los Angeles — City/Nearest Community: _____

Cross Streets: Central City and Central City North Community Plan Areas (CPAs) — Zip Code: _____

Longitude/Latitude (degrees, minutes and seconds): ____° ____′ ____″ N / ____° ____′ ____″ W Total Acres: _____

Assessor's Parcel No.: _____ Section: _____ Twp.: _____ Range: _____ Base: _____

Within 2 Miles: State Hwy #: _____ Waterways: _____

Airports: _____ Railways: _____ Schools: _____

Document Type:

CEQA: ☒ NOP ☐ Draft EIR — NEPA: ☐ NOI — Other: ☐ Joint Document
☐ Early Cons ☐ Supplement/Subsequent EIR ☐ EA ☐ Final Document
☐ Neg Dec (Prior SCH No.) _____ ☐ Draft EIS ☐ Other: _____
☐ Mit Neg Dec Other: _____ ☐ FONSI

Local Action Type:

☐ General Plan Update ☐ Specific Plan ☒ Rezone ☐ Annexation
☒ General Plan Amendment ☐ Master Plan ☐ Prezone ☐ Redevelopment
☐ General Plan Element ☐ Planned Unit Development ☐ Use Permit ☐ Coastal Permit
☒ Community Plan ☐ Site Plan ☐ Land Division (Subdivision, etc.) ☐ Other: _____

Development Type:

☐ Residential: Units _____ Acres _____
☐ Office: Sq.ft. _____ Acres _____ Employees _____
☐ Commercial: Sq.ft. _____ Acres _____ Employees _____
☐ Industrial: Sq.ft. _____ Acres _____ Employees _____
☐ Educational: _____
☐ Recreational: _____
☐ Water Facilities: Type _____ MGD _____
☐ Transportation: Type _____
☐ Mining: Mineral _____
☐ Power: Type _____ MW _____
☐ Waste Treatment: Type _____ MGD _____
☐ Hazardous Waste: Type _____
☒ Other: Community Plan (4,166 acres)

Project Issues Discussed in Document:

☒ Aesthetic/Visual ☐ Fiscal ☒ Recreation/Parks ☐ Vegetation
☒ Agricultural Land ☐ Flood Plain/Flooding ☐ Schools/Universities ☒ Water Quality
☒ Air Quality ☐ Forest Land/Fire Hazard ☐ Septic Systems ☒ Water Supply/Groundwater
☒ Archeological/Historical ☒ Geologic/Seismic ☒ Sewer Capacity ☐ Wetland/Riparian
☐ Biological Resources ☒ Minerals ☐ Soil Erosion/Compaction/Grading ☒ Growth Inducement
☐ Coastal Zone ☒ Noise ☒ Solid Waste ☒ Land Use
☒ Drainage/Absorption ☒ Population/Housing Balance ☒ Toxic/Hazardous ☒ Cumulative Effects
☒ Economic/Jobs ☒ Public Services/Facilities ☒ Traffic/Circulation ☐ Other: _____

Present Land Use/Zoning/General Plan Designation:

Residential, Commercial, Industrial, Open Space, Public/Quasi-Public (to be amended as part of Community Plan)

Project Description: *(please use a separate page if necessary)*

The Project is the update to the Downtown Community Plans, and the adoption of necessary amendments to the land use, zoning, community plan text, and other ordinances to implement those updates. (Please see attachment A for additional information).

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with and "**X**".
If you have already sent your document to the agency please denote that with an "**S**".

X	Air Resources Board	X	Office of Historic Preservation
	Boating & Waterways, Department of		Office of Public School Construction
	California Emergency Management Agency	X	Parks & Recreation, Department of
	California Highway Patrol		Pesticide Regulation, Department of
X	Caltrans District #7	X	Public Utilities Commission
	Caltrans Division of Aeronautics	X	Regional WQCB #LA
X	Caltrans Planning		Resources Agency
	Central Valley Flood Protection Board	X	Resources Recycling and Recovery, Department of
	Coachella Valley Mtns. Conservancy		S.F. Bay Conservation & Development Comm.
	Coastal Commission		San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
	Colorado River Board		San Joaquin River Conservancy
X	Conservation, Department of		Santa Monica Mtns. Conservancy
	Corrections, Department of		State Lands Commission
	Delta Protection Commission		SWRCB: Clean Water Grants
	Education, Department of		SWRCB: Water Quality
X	Energy Commission		SWRCB: Water Rights
	Fish & Game Region #		Tahoe Regional Planning Agency
	Food & Agriculture, Department of	X	Toxic Substances Control, Department of
	Forestry and Fire Protection, Department of	X	Water Resources, Department of
	General Services, Department of		
X	Health Services, Department of		Other:
X	Housing & Community Development		Other:
X	Native American Heritage Commission		

Local Public Review Period (to be filled in by lead agency)

Starting Date 02/06/17 Ending Date 03/06/17

Lead Agency (Complete if applicable):

Consulting Firm: Rincon
Address: 250 East 1st Street
City/State/Zip: Los Angeles, CA 90012
Contact: Joe Power
Phone: (805) 947-4858

Applicant: City of Los Angeles
Address: 200 North Spring Street, City Hall, Room 525
City/State/Zip: Los Angeles, 90012
Phone: (213) 978-1304

Signature of Lead Agency Representative: Greg D. Carr **Date:** 02/03/17

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

Tal Harari <tal.harari@lacity.org>

Fwd: Abundant Housing LA scoping comments on DTLA2040

Bryan Eck <bryan.eck@lacity.org> Mon, Mar 6, 2017 at 4:15 PM
To: Tal Harari <tal.harari@lacity.org>

——— Forwarded message ———
From: **Mark Vallianatos** <markvalli@gmail.com>
Date: Mon, Mar 6, 2017 at 4:07 PM
Subject: Abundant Housing LA scoping comments on DTLA2040
To: bryan.eck@lacity.org

Hi Bryan,

I am attaching scoping comments on the environmental review of DTLA2040 from Abundant Housing LA. We are happy to discuss as you move forward. Thanks for your work on this plan.

mark

–

BRYAN ECK
CITY PLANNER
DEPARTMENT OF CITY PLANNING
Community Planning Bureau | Downtown Community Planning
P 213.978.1304
E bryan.eck@lacity.org
200 N. Spring St., Room 667
Los Angeles, CA 90012
www.dtla2040.org

DTLA2040 abundant housing LA scoping comments.pdf
81K

Abundant Housing **LA**

City of Los Angeles, Department of City Planning
ATTN: Bryan Eck, City Planner
Case Numbers: CPC-2017-432-CPU; ENV-2017-433-EIR
200 N. Spring Street, Room 667
Los Angeles, CA 90012

We write to comment on environmental review scoping for the updates of two community plans in Downtown Los Angeles (DTLA 2040). Abundant Housing LA is a volunteer organization that supports more housing in Los Angeles. We encourage the Department of City Planning to study a "high housing alternative" - that is, an alternative that allows for significantly more zoned housing capacity, more new housing units, and higher potential population growth in downtown LA than the expected growth rate of approximately 70,000 housing units. We believe that a higher housing/ population growth alternative will be the environmentally superior alternative, because adding denser, transit-accessible housing in Downtown LA will reduce VMT, reduce greenhouse gas emissions, reduce air pollution, save energy, and reduce water use.

Before turning to the positive environmental impacts of allowing more housing in Downtown LA, we would like to address concerns that it is appropriate to study a higher housing alternative because this might 'induce' growth above what is currently projected to occur. Zoning in and of itself cannot induce population growth. Zoning can only artificially cap housing, and thereby exclude residents who might wish to stay in or move to area; or allow sufficient space for changing demand, which can shift based on economic and demographic and lifestyle factors. We believe that allowing sufficient space for growth and change is better policy from both a housing and environmental perspective than artificially capping supply.

Artificially capping housing supply in downtown Los Angeles will harm the city and region's environment and human health. This is because living in denser. transit accessible areas is environmentally superior to living in lower-density, auto-dependent places. Households living in exurban locations in the LA region drive up to 47% more than equivalent households in more central, transit-rich neighborhoods. http://www.dot.ca.gov/newtech/researchreports/reports/2016/CA16-2832_FinalReport.pdf The negative environmental impacts associated with preventing more homes in downtown LA therefore include higher VMT, more greenhouse gas emissions and more air pollution with local and regional impacts including nitrous oxides, sulfur dioxides, carbon monoxide, PM10 and PM2.5. These increased emissions will harm human health.

Artificially capping housing supply in downtown Los Angeles will also waste energy, further harming the climate and increasing negative environmental externalities associated with fossil fuel extraction and generation. Residents of multi-family buildings use significantly less energy per unit than residents of single family houses. https://www.arb.ca.gov/research/apr/past/10-323h.pdf Because all new housing in downtown LA will be multi-family, while there will be

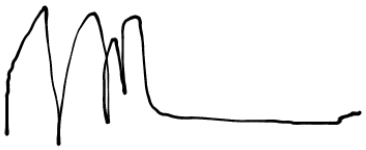
mix of single family and multi-family construction in other parts of the city and region, increasing zoned housing capacity in Downtown LA is a good way to reduce energy use and reduce emissions of greenhouse gases and pollution.

Artificially capping housing supply in downtown Los Angeles will also waste water. Residents of all multi-family homes in Los Angeles use less water than residents of all single family homes, even though there are approximately twice as many multi-family units. http://www.latimes.com/visuals/graphics/la-me-g-aa2-snapshot-water-usage-20150109-htmlstory.html Because all new housing in downtown LA will be multi-family, while there will be mix of single family and multi-family construction in other parts of the city and region, increasing zoned housing capacity in Downtown LA is a good way to reduce water use.

Our colleague Shane Phillips has submitted scoping comments that reference sub-geographies within the Downtown LA plan areas. We support his suggestions for these sub-areas.

Thank you for considering our views as you prepare to conduct an environmental analysis of DTLA2040.

Mark Vallianatos on behalf of Abundant Housing LA





Tal Harari <tal.harari@lacity.org>

Fwd: Downtown EIR

Bryan Eck <bryan.eck@lacity.org> Tue, Feb 21, 2017 at 5:26 PM
To: Tal Harari <tal.harari@lacity.org>

Please include with EIR materials. Thanks.

Begin forwarded message:

From: cheryl younger/allan harris <cheryl.younger@yahoo.com>
Date: February 21, 2017 at 3:32:14 PM PST
To: Bryan Eck <bryan.eck@lacity.org>
Subject: Re: Downtown EIR
Reply-To: cheryl younger/allan harris <cheryl.younger@yahoo.com>

Bryan,

Thank you for your prompt response and a greater thank you for working hard to make our great city a better place in which to live. These are exciting times and I can't wait to see the results.

Cordially,
Allan Harris

Cheryl Younger and Allan Harris

Cheryl's USA Cell (001) 1 (212) 203 9645 **Allan's** USA Cell (001) 1 (212) 966 4035 **Skype #** (646) 233 3270

cheryl.younger@yahoo.com

Home:

LA 108 W 2ND ST #1002
Los Angeles, CA 90012

NYC 35 Mercer Street 3A
New York, NY 10013

From: Bryan Eck <bryan.eck@lacity.org>
To: cheryl younger/allan harris <cheryl.younger@yahoo.com>
Sent: Tuesday, February 21, 2017 3:25 PM
Subject: Re: Downtown EIR

Hi Allan,

Thank you for the valuable feedback. Regardless of the nomenclature, the support and protection of the important historic resources of Downtown Los Angeles is important

component of the future plan and these will be studied as part of the Environmental Impact Report. I appreciate your involvement.

Best,
Bryan

On Mon, Feb 20, 2017 at 1:41 PM, cheryl younger/allan harris <cheryl.younger@yahoo.com> wrote:

> Dear Mr. Eck,
>
> It was a pleasure to meet you last Thursday at the Scoping Meeting on the Downtown Plan environmental impact report. With reference to our discussion and my written and oral request that the Higgins Building being placed in the Traditional Core and not the Transit Core, I recall your concerns that there was not "enough teeth going northward from Fourth Street to embrace the Higgins Building" (Forgive me if my paraphrase might be inaccurate).
>
> The heart of the Traditional Core as expressed in the language of this zone by the City Planning Department is that it is a "Rich collection of historically significant buildings." Historically, the Higgins building in my opinion has been erroneously excluded from being in the Historic Core.
> My review of the buildings included in the Traditional zone if you extend it northward from Fourth Street to 2nd Street running from the west side of Broadway to Los Angeles Street encompasses a wealth of historically significant architectural treasures:
>
> 1. Our Higgins Building at 2nd and Main, a Cultural Monument of Los Angeles, for which we will be applying for registration on on the National Register of Historic Places. This is one of the premier examples of Beaux Art Architecture west of the Mississippi.
>
> 2. St. Vibiana across the street built in 1876, a masterpiece of Italianate architecture which is on the National Register.
>
> 3. The Bradbury Building at 3rd and Broadway, which is on the National Register and certainly one of the most unique old buildings in downtown Los Angeles.
>
> 4. The St. George Hotel built in 1903, just east of Main Street on 3rd.
>
> 5. Grand Central Market, on Broadway near 3rd, flourishing since 1917 as a unique market place and downtown tourist attraction.
>
> 6. Million Dollar Theater, just North of the Grand Central Market, built in 1917, is the Grand Daddy of opulent downtown theaters.
>
> 7. The Douglas Building on Spring just north of 3rd, built in 1898, is one of the oldest adaptive reuse buildings in downtown.
>
> 8. Biddy Mason Park, at 333 S. Spring Street is an historic pedestrian park chronicling the achievement of the African-American 19th Century midwife and Philanthropist, Biddy Mason.

9. The Downtown Independent Theater at 251 S. Main Street, built on the bones of the old Arrow Theater, in 1925, where there has been a theater since that time.

10. The 5 story “Pope of Broadway” mural of Anthony Quinn, just restored on the Victor Clothing Building at 240 South Broadway, while painted in 1984, certainly adds coloratura to the area.

In sum, the area I argue should be part of the Traditional core certainly meets the Planning Department’s historically significant criteria for this zone. I would ask that you revisit this request and change your zone classification to include this area.

Thank you,

Allan Harris
Chair
Higgins Loft Neighborhood Impact Committee

Cheryl Younger and Allan Harris

Cheryl's USA Cell (001) 1 (212) 203 9645 **Allan's** USA Cell (001) 1 (212) 966 4035 **Skype #** (646) 233 3270

cheryl.younger@yahoo.com

Home:

LA 108 W 2ND ST #1002
Los Angeles, CA 90012

NYC 35 Mercer Street 3A
New York, NY 10013

--

BRYAN ECK
CITY PLANNER

DEPARTMENT OF CITY PLANNING
Community Planning Bureau | Downtown Community Planning
P 213.978.1304
E bryan.eck@lacity.org
200 N. Spring St., Room 667
Los Angeles, CA 90012
www.dtla2040.org

Tal Harari <tal.harari@lacity.org>

Fwd: Comments for NOP - Downtown Community Plans, Downtown Zoning Code

Bryan Eck <bryan.eck@lacity.org> Mon, Mar 6, 2017 at 12:10 PM
To: Tal Harari <tal.harari@lacity.org>

---------- Forwarded message ----------
From: **Estela Lopez** <ELopez@centralcityeast.org>
Date: Mon, Mar 6, 2017 at 12:08 PM
Subject: Comments for NOP - Downtown Community Plans, Downtown Zoning Code
To: Bryan Eck <bryan.eck@lacity.org>
Cc: jose huizar <jose.huizar@lacity.org>, Shawn Kuk <shawn.kuk@lacity.org>, "vince.bertoni@lacity.org" <vince.bertoni@lacity.org>, Patricia Diefenderfer <patricia.diefenderfer@lacity.org>

Dear Bryan, attached please find our comments on the EIR Notice of Preparation regarding the Downtown Community Plans and Zoning Code. Thank you for this opportunity to provide our input.

Cordially,

Estela Lopez

Downtown Industrial District BID

725 Crocker St.

Los Angeles, CA 90021

213-228-8484

--

BRYAN ECK
CITY PLANNER

DEPARTMENT OF CITY PLANNING
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CCEA-NOPcomments.pdf
87K

Central City East Association

Los Angeles Downtown Industrial District
Business Improvement District

Board of Directors

Chairperson
Mark Shinbane
Ore-Cal Corporation

Vice-Chair
Matt Klein
HBK Investments

Treasurer
Dilip Bhavnani
Legendary Developments, LLC

Secretary
Ernest Doizaki
American Fish and Seafood

Andrew J. Bales
Union Rescue Mission

Drew Bauer
Young's Market Company

Richard Gardner
L.A. Wholesale Produce Market

Howard Klein
Ocean Beauty Seafoods

Larry Rauch
Los Angeles Cold Storage

Bob Smiland
Inner City Arts

Michael Tansey
Peterson/Tansey

Chairman Emeritus
Charlie Woo
Mega toys

Executive Director
Estela Lopez

March 6, 2017

Brian Eck, City Planner
City of Los Angeles
Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, CA 90012

Re: Notice of Preparation (NOP) of a combined Draft Environmental Impact Report (EIR) for Updates to the Central City and Central City North Community Plans

Case Numbers: CPC-2017-432-CPU; ENV-2017-433-EIR

Dear Bryan,

The Central City East Association (CCEA), via this letter, is providing written comments as requested in the abovementioned NOP. CCEA represents residents, businesses, social service providers and property owners in a 40-block district that occupies more than 260 acres in the heart of Downtown Los Angeles.

Our stakeholders are diverse. They include institutions that have had a home in CCE for more than a hundred years, providing services to those most in need, stepping up when none other in the region will. We have long-established businesses that have steadfastly contributed to the economy of Downtown Los Angeles, during days of boom or bust. We welcome residents that consider CCE a safe harbor in times of need and distress. We are proud of our eclectic, albeit disparate, mix of uses and see in our future a more considered and thoughtful approach to new users and uses.

We would like to congratulate the City on commencing the community plan update. It has been a long time coming and we wholeheartedly support your efforts. As the City begins its environmental analysis we would like you to strongly consider:

- Prioritizing the review and rethink of outdated land use policies that have seen districts like CCE disproportionately bear decades of debilitating, unintended consequences of past decisions.
- New and non-traditional approaches to embedding flexibility in land use and urban design policies that will allow appropriate new uses to already mixed districts like CCE.

- CCE is a neighborhood where people live and work. It deserves similar levels of investment and attention as all others neighborhoods where people live and work.

As you are aware, CCEA completed its own planning study in 2015, which we have shared with you. We are more than appreciative of the feedback and involvement of City Planning staff at that time and look forward to reciprocating in a similar manner. We hope to rigorously review and provide constructive feedback when the draft EIR is circulated for public review.

Thanks very much for your consideration and for the opportunity to provide input.

Sincerely,

Estela Lopez, Executive Director

cc: Hon. Jose Huizar
S. Kuk, CD 14
V. Bertoni, City Planning
P. Diefenderfer, City Planning

Central City East Association

Los Angeles Downtown Industrial District
Business Improvement District

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Michael Tansey
Peterson/Tansey

Chairman Emeritus
Charlie Woo
Mega toys

Accountant
Ken Coelho, CPA
RBZ, LLP

Executive Director
Raquel K. Beard

Director of Operations
Edward Camarillo

Deputy Director of Operations
Fred Faustino

February 1, 2016

Mr. Bryan Eck
Mr. Nick Maricich
Los Angeles City Planning Department
City Hall
200 N. Spring Street
Los Angeles, CA 90012

Dear Bryan and Nick:

The Central City East Association (CCEA) is pleased to present you with the completed Central City East Planning Study, commissioned by CCEA and performed by AECOM. The study's purpose was to fill a void of information about Central City East. Its role as the region's hub of social and recovery services, as important as that is, presents only one facet of a community that is surrounded by an urban environment in transition. This study's intention is to go beyond the current headlines to spur stakeholders and policy makers into a thoughtful and practical conversation about the future of Central City East.

For nearly three decades, CCEA has served as the principal voice and advocate of industrial property and business owners in this 260-acre district of Downtown Los Angeles. CCEA, a California non-profit corporation, also administers the Downtown Industrial Business Improvement District. This study was funded by property owners in the area, with assistance from the City Department of Workforce Development.

Guarav Srivastava, Principal at AECOM Design + Planning, led our effort and served as principal-in-charge of the study. AECOM undertook a similar effort in 2014 sponsored by the Southern California Association of Governments (SCAG) to prepare a vision plan for the Downtown Los Angeles Neighborhood Council (DLANC). AECOM's 2012 study for the Fashion District BID just south of Central City East addressed head-on the challenges of industrial land use and the pressures of transition.

The Central City East study included separate interviews with three distinct stakeholder groups: property owners, residents and social service providers.

The conclusions drawn from these interviews were interesting and in some instances unexpected:

1. Reverse the unequitable distribution of improvements to Downtown's public realm. Central City East lacks infrastructure oriented towards pedestrians. For instance, there are few crosswalks and few traffic signals that interrupt the flow of traffic on the Fifth/Sixth streets couplet.

2. Diversify housing to include affordable, mixed income, mixed-collar, multi-generational. Deliberately clustering residents by income, whether affluent or poor, is always bad planning policy. In this particular case, Central City East has devolved into a district that is separate, avoided and ignored.

3. Blur boundaries to create better connections with neighboring districts. The wall created along Alameda Street preventing Fifth Street from crossing Central Avenue has had the effect of a dam, preventing a natural flow and connection through Downtown to the Arts District and the Los Angeles River.

A study of this type would typically address elements important to the future development of a community such as land use, urban design, transportation, sustainability and branding. In Central City East, however, formidable challenges stand in the way of forward planning and visioning. For decades, the result has been inaction. This study attempts to focus on a few, targeted and achievable goals that hold the possibility of beginning to reverse decades of neglect and disinvestment in the public realm.

One example is zoning. The "M" zone has had the practical effect of freezing the area in time. Relatively little traditional manufacturing remains. These uses abandoned Downtown decades ago. Most of the current uses in the district are related to food, cold storage and textile storage.

An area frozen in time is an area doomed to fail.

Change is inevitable. All neighborhoods in Los Angeles have a dynamism that is inherent in place and this neighborhood should be no different. In light of the City's limited resources to address the complexity of Central City East, CCEA undertook this study and respectfully presents its findings to the City Planning Department for inclusion in its efforts to update the Central City Community Plan.

Thank you for your consideration.

Sincerely,



Mark Shinbane, Chairman
Central City East Association

Cc:
Ms. Patricia Diefenderfer
Hon. Councilmember Jose Huizar, CD14
Shawn Kuk, Planning Director, CD14



Tal Harari <tal.harari@lacity.org>

Fwd: EIR Comments

Bryan Eck <bryan.eck@lacity.org> Mon, Mar 6, 2017 at 11:19 AM
To: Tal Harari <tal.harari@lacity.org>

---------- Forwarded message ----------
From: **cheryl younger/allan harris** <cheryl.younger@yahoo.com>
Date: Mon, Mar 6, 2017 at 11:01 AM
Subject: EIR Comments
To: Bryan Eck <bryan.eck@lacity.org>

City of Los Angeles, Department of City Planning
ATTN: Bryan Eck, City Planner
Case Numbers:
CPC2017 432CPU; ENV2017 433EIR
200 N. Spring Street, Room 667
Los Angeles, CA 9001

Dear Mr. Eck,
Enclosed are our comments on the Downtown EIR.

Allan Harris
Cheryl Younger

Cheryl Younger and Allan Harris

Cheryl's USA Cell (001) 1 (212) 203 9645 **Allan's** USA Cell (001) 1 (212) 966 4035 **Skype #** (646) 233 3270

cheryl.younger@yahoo.com

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--

BRYAN ECK
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3 attachments

Downtown EIR Comments.docx
131K

Brian Eck letter.docx
129K

Historic District #1.docx
138K

EXHIBIT “A”

Dear Mr. Eck, February 20, 2017

It was a pleasure to meet you last Thursday at the Scoping Meeting on the Downtown Plan environmental impact report meeting. With reference to our discussion and my written and oral request the the Higgins Building being placed in the Traditional Core and not the Transit Core, I recall your concerns that there was not “enough teeth going northward from Fourth Street to embrace the Higgins Building” (Forgive me if my paraphrase might be inaccurate).

The heart of the Traditional Core as expressed in the language of this zone by the City Planning Department is that it is a “Rich collection of historically significant buildings.” Historically, the Higgins building in my opinion has been erroneously excluded from being in the Historic Core. My review of the buildings included in the Traditional zone if you extend it northward from Fourth Street to 2nd Street running from the west side of Broadway to Los Angeles Street encompasses a wealth of historically significant architectural treasures:

1. Our Higgins Building at 2nd and Main, a Cultural Monument of Los Angeles, for which we will be applying for registration on on the National Register of Historic Places. This is one of the premier examples of Beaux Art Architecture west of the Mississippi.

2. St. Vibiana across the street built in 1876, a masterpiece of Italianate architecture which is on the National Register.

3. The Bradbury Building at 3rd and Broadway, which is on the National Register and certainly one of the most unique old buildings in downtown Los Angeles.

4. The St. George Hotel built in 1903, just east of Main Street on 3rd.

5. Grand Central Market, on Broadway near 3rd, flourishing since 1917 as a unique market place and downtown tourist attraction.

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10. The 5 story “Pope of Broadway” mural of Anthony Quinn, just restored on the Victor Clothing Building at 240 South Broadway, while painted in 1984, certainly adds coloratura to the area.

In sum, the area I argue should be part of the Traditional core certainly meets the Planning Department’s historically significant criteria for this zone. I would ask that you revisit this request and change your zone classification to include this area.

Thank you,

Allan Harris
Chair
Higgins Loft Neighborhood Impact Committee

City of Los Angeles, Department of City Planning
ATTN: Bryan Eck, City Planner
Case Numbers:
CPC2017 432CPU; ENV2017 433EIR
200 N. Spring Street, Room 667
Los Angeles, CA 9001

This is the response of Allan Harris and Cheryl Younger, 108 West 2nd Street Unit 1002, Los Angeles CA 90012, to the request for comments about the preparation of an EIR for the Central City Community Plan and new Zoning Code The Higgins Building is located at 108 West 2nd Street. Built in 1910 as a classic Beaux Arts building, it is a Cultural monument of the City of Los Angeles The Building consists of 135 residential condominium units and seven commercial units.

1. Community Plan.

A. We object to the inclusion of the Higgins Building in the Central City Community Plan as part of the Transit Zone, urging that it is properly included in the Traditional Zone. Argument in support of this position is attached in the Letter of Allan Harris to Bryan Eck of the Los Angeles Department of City Planning dated February 20, 2017, attached as Exhibit "A" hereto.

B. Creation of a Bradbury, St. Vibiana, St. George Hotel, Higgins Building, City Hall Historic District.

We believe that the city should create a Bradbury, St. Vibiana, St. George Hotel, Higgins Building, City Hall Historic District. Argument in support of this proposal is contained in a monograph written by Allan Harris, Chair of the Higgins Loft Neighborhood Impact Committee, attached hereto as Exhibit "B" hereto.

2. Scope of EIR. The following planning concerns should be addressed in the EIR:

A. Parking. The recent building of large buildings downtown has reduced the number of accessible and affordable parking facilities for downtown residents. The Department of City Planning should consider the demand for future parking which is available and affordable. The creation of a Municipal Parking Authority should be considered.

B. Population size and density. The optimal population and density for a fully built downtown should be considered and achieved. Overbuilding and the Manhattanization of downtown should be avoided. The tipping point of building

and population growth beyond which the quality of life deteriorates should be addressed.

C. Control of excessively tall buildings. Downtown is sufficiently built up that each section of the downtown has its own scale and character. Out of scale buildings that destroy the character of individual sections should be avoided.

Additionally, the effect of large and tall buildings on air quality, air flow and future climate temperature increase should be considered.

D. Increased Community control over development. The profit concerns of developers should not dictate what gets built. Community opinion as to design, size, scale and amenities should be given a voice. Giving greater voting control to Neighborhood Councils as to these matters would help.

E. Protecting the aesthetics of City Hall. Recent proposals in the area of City Hall of buildings far in excess of the height of City Hall, 28 stories, are troubling. The City Hall is a wonderful aesthetic feature of Los Angeles. Not only just in many movies, it stands perpetually as a splendid example of our city and its architectural beauty. Restrictions against buildings of the size that would mar its majesty in our skyline and view shed should be prohibited.

Respectfully Submitted,

Allan Harris
Cheryl Younger

Allan Harris is a licensed attorney of the states of New York and New Jersey, a retired New Jersey Municipal Court Judge, and served as attorney to the Paterson New Jersey Zoning Board of Adjustment. He is also chair of the Higgins Loft Neighborhood Impact Committee

Cheryl Younger is an internationally exhibited Art Photographer and an M.A., M.F.A. from the University of Iowa. She has been associated with, inter alia, Columbia University in New York and New York University,

EXHIBIT “B”

City Planners:

A call for a Bradbury, Vibiana, St. George Hotel, Higgins, City Hall Historic District.

Downtown Los Angeles is a precious, fragile area. It has historic jewels which if not cared for properly will be forever lost. If you look at St. Vibiana’s Cathedral today, you will see a perfect example of careless planning. The beautiful 1876 Italianate church has been dwarfed and eaten up by an eight story modern “money-strocity” apartment building sandwiched next to it on its Southside.

Across the street, Joe’s Auto Park, has served a 30-day wrecking ball notice on the Independent Theater, a performance space with roots back to 1925, The Smell, the Iconic Indie music venue, and the Nueva Jalisco, the first and only Latino Vaquero Gay Bar in the city. What’s in store for these historic properties does not require a gaze into a Chrystal ball. With 30 plus story high rise developments on the drawing boards for 4th and Hill, and 4th and Broadway, you can visualize the next megalopian high rise sweeping away these treasures with the building of another mindless giant.

Just to the North stands the majestic Los Angeles City Hall, immortalized in not only countless movies, but in beautiful continuity to the mesmerized gaze of our community. Stand atop the plaza at the Chandler Opera House and look east to the triumph of Grand Park as it sweeps down the mall culminating in City Hall. The park and mall are examples of planning at its most successful level. Walk south from City Hall and view the Los Angeles Police Administration Building and the Cal-Trans Building, heartening examples of contemporary architecture.

Cross the street, and the Higgins Building, a Los Angeles Cultural Historic Monument, a classic example of Beaux Arts Design constructed in 1910, stands proudly at the corner of 2nd and Main.

This is all a wonderful patrimony; but if Joes’s Lot building plans between Spring and Main and for most of that area between 2nd and 3rd, destroys the smaller historic buildings and erects a sterile, high rise behemoth on that large lot, consider the irreparable damage in the context of city aesthetics.

Will there be a giant high rise rival that impairs the view and singular majesty of City Hall. Will the Higgins Building be marginalized as an aesthetic also ran like Vibiana? When the large parking lot is gone, where will commuters looking to access our burgeoning transit system at the Regional Connectors new station at 2nd and Spring, park their cars?

Historic Districts preserve the architectural and cultural achievements that make great cities so venerable. Across the globe, sensible city planners have saved their “Olde Townes”. From

Tokyo and Shanghai to Boston and Philadelphia, historic districts have received their sacrosanct timeless status.

Therefore, I call upon City Planners to save the area Northward from 3rd Street to City Hall, and bordered by Broadway to Los Angeles Streets, creating a Bradbury, Vibiana, St. George Hotel, Higgins Building, City Hall Historic District. Earmark the Joe's Parking Lot by way of eminent domain for a large park with underground parking and you will create a planning triumph that will rival Grand Park. If you have ever stood on the steps of the Philadelphia Museum of Art and looked towards City Hall or trod the Great mall in Washington, you will know the thrill of timeless planning excellence. Los Angeles can achieve the same success.

The purpose of the Historic District is to save existing buildings from destruction through development and to preserve the historic character of the area from any development, high-rise or otherwise, that would be esthetically and culturally deleterious to the unique character of the existing neighborhood.

Let me finish on a personal note for the Higgins Building at 2nd and Main where I reside. For some inexplicable reason the Higgins Building never winds up in the Historic Core where it rightfully belongs. In the proposed City Plan the same error is made. It is historically and architecturally part of the historic core and should belong in it. Therefore, Vibiana, The St. George Hotel, and the Higgins building should be moved to the downtown Traditional Core and not the Transit Core.

Sincerely,
Allan M. Harris
108 West 2nd Street, #1002
Los Angeles, CA 90012
212 966 4035
harrisyounger@aol.com

Tal Harari <tal.harari@lacity.org>

Fwd: NOP for Downtown Plan updates and re:code la project

Bryan Eck <bryan.eck@lacity.org> Mon, Mar 6, 2017 at 8:49 AM
To: Tal Harari <tal.harari@lacity.org>

——— Forwarded message ———
From: **Dan Silver** <dsilverla@me.com>
Date: Sat, Mar 4, 2017 at 12:39 PM
Subject: NOP for Downtown Plan updates and re:code la project
To: bryan.eck@lacity.org

March 4, 2017

City of Los Angeles, Department of City Planning
ATTN: Bryan Eck, City Planner
Case Numbers: CPC-2017-432-CPU; ENV-2017-433-EIR
200 N. Spring Street, Room 667, Los Angeles, CA 90012

E-mail: bryan.eck@lacity.org

RE: NOP for Downtown Plan updates and re:code la project

Dear Mr Eck:

Please find a list of issues for consideration in the DEIR and re-code process. I am a downtown resident heartened by the area's resurgence but appalled by the City's lack of coherent urban planning. I will not raise the standard issues of density, location, transportation, and overall community character. Rather, I will focus on factors suffering from neglect yet important to quality of life.

1) Incompatible uses

Downtown is currently plagued by the casual admixture of residential and bars/clubs/bars masquerading as restaurants. In order to protect residents from associate noise and disturbance, alcohol service in such locations should be restricted to particular hours, e.g., 10 PM or 12 AM. Beer and wine only is far less a problem that full alcohol. Restrictions favored by alcohol vendors, such as "food with liquor" requirements are, as a practical matter, unenforceable and an cynical deceit. I speak from experience. The DEIR should evaluate a range of options to reduce the impacts of incompatible use due to alcohol service. Designation of *non-residential* entertainment districts is one approach.

2) Noise from amplified music in business establishments

Music should never spill out onto the street. It *must* be completely contained within the business itself, and never allowed to emerge via a patio or sidewalk or open door. The DEIR should evaluate a range of options to reduce the impacts of such noise and to ensure enforceability.

3) Noise transmittal in buildings

Multiunit construction standards are grossly insufficient for noise transmittal between units. With most new construction wood or steel rather than concrete, "double drywall" is the standard, and it *does not work*. There are many available construction techniques and materials that codes should require. Quality of life in multiunit buildings is incomparably increased by sound isolation. It is cost effective for the benefits. The DEIR should evaluate a range of options to strengthen building codes for residential buildings.

4) Architectural design

The majority of new architecture in downtown is hack work. High rises are banal and the standard 4-5 story buildings are run-of-the-mill mediocrities, in effect a new generation of the Los Angeles multifamily junkscape, which has taken different forms over the decades. The DEIR should assess the feasibility of a design review board, perhaps under the auspice of SciArc.

On a related matter, the City should rethink its requirement for "public art." It is a cost of business that has not reliably delivered benefits commensurate with the cost. On the other hand, the one athing that has turned out well, overall, is mural art on the sides of buildings, freeway infrastructure, etc. Indeed, many murals have become iconic for the City. The City should form a relationship with the Los Angeles Mural Conservancy to bring more mural art forward, and the DEIR should consider shifting the public art requirement to murals.

Also, it would be better to focus on quality landscaping and landscape design as opposed to sculpture and other artworks of debatable taste and quality. The rocks and plantings in the new Blossom Chinatown apartments courtyard are an example of a success. The DEIR should explore standards for landscape design and the use of a review committee.

6) Signage

Billboards, particularly digital, are egregious destroyers of public ambiance and public space. They are also safety and traffic hazards due to forced distraction. The DEIR should fully evaluate the aesthetic, cultural, and safety impacts, and *prohibit* such signage.

Please consider these issues. The Planning Department will have to lead the way – though what I have seen to date from the Planning Department in the ongoing billboard fiasco provides scant comfort. Only strong staff recommendations can survive a City Council so heavily influenced by developers, labor unions, and sign companies.

Please retain me on mailing and distribution lists for this project, including CEQA documents and public hearings. Acknowledgment of receipt of these comments is requested by return email. Thank you in advance.

Sincerely,

Dan Silver
222 S Figueroa St #1611
Los Angeles CA 90012
dsilverla@me.com

–

BRYAN ECK
CITY PLANNER

DEPARTMENT OF CITY PLANNING
Community Planning Bureau | Downtown Community Planning
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E bryan.eck@lacity.org
200 N. Spring St., Room 667
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DEPARTMENT OF TRANSPORTATION
DISTRICT 7-OFFICE OF TRANSPORTATION PLANNING
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-6536
FAX (213) 897-1337
www.dot.ca.gov

Serious drought.
Help save water!

March 2, 2017

Mr. Elk
City of Los Angeles
200 North Spring Street, Room 525
Los Angeles, CA 90012

RE: Central City and Central City North
Community Plan and Update
SCH# 2017021024
GTS# 07-LA-2017-00625ME NOP

Dear Ms. Elk:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project intends to update the Downtown Community Plans, and the adoption of necessary amendments to the land use, zoning, community plan text, and other ordinances to implement those updates.

The California Department of Transportation (Caltrans) as the State agency is responsible for the planning, operations, and maintenance of State highways and have similar transportation goals with the City In the spirit of mutual and collaborative planning, we offer our expertise in the areas of transportation modeling, mainline freeway analysis, system and corridor planning, environmental and community impact assessment, as well as identifying critical operational deficiencies affecting freeway congestion, speed, and delay.

"Caltrans is particularly interested in the transportation planning roles of local plans and suggests that the following areas be emphasized.

- Coordination of planning efforts between local agencies and Caltrans districts.
- Preservation of transportation corridors for future system improvements; and
- Development of coordinated transportation system management plans that achieve the maximum use of present and proposed infrastructure."

Due to new developments increasing the use of local and regional roadways, the circulation element can identify strategies the City will pursue to maintain good levels of service. We request inclusion in the environmental review process of land use projects within the County General Plan area and all projects that have the potential to significantly impact traffic conditions on State highways. To avoid delays and any misunderstandings in the traffic impact analysis, we request to be involved in its development.

Please be aware that the thresholds for significance on State highway facilities are different than those applied in the Los Angeles County Management Program (CMP). For State thresholds and guidance on

the preparation of acceptable traffic studies, please refer to the Statewide Guide for the preparation of Traffic Impact Studies.

Additionally, if significant impacts are anticipated on the State highway system the Department can work with the City and applicants to identify appropriate traffic mitigation measures. Traffic mitigation alternatives may include vehicular demand reducing strategies, such as incentives for commuters to use transit i.e. park-and-ride lots, discounts on monthly bus and rail passes, vanpools, etc. A transportation fund mechanism similar to the West LA TIMP is recommended for Central City Community Plan.

Caltrans is aware of the critical relationship between land use and transportation. The quality of the State transportation system operation can affect the quality of the local circulation system operation. The Circulation Element of the General Plan needs to be consistent with the Land-Use and Housing Elements of the General Plan.

We recommend that special attention be given to the jobs-and-housing balance concept. Communities with predominantly residential allocations should be encouraged to set aside areas for office, commercial/retail, and open space uses. Benefits of balanced communities include: reduction of long morning and evening commutes on State highways, shorter trips which in turn would reduce the consumption of fuel and air pollutants. It may also change direction of trips. Instead of most traffic traveling in one direction during peak periods, some trips may be diverted in the opposite direction. Other land use strategies may include Transit-Oriented Developments (TODs).

Continued high growth is expected for Los Angeles County, which will have impacts to our State transportation facilities. For large development projects, we ask that efforts be made to provide affordable housing for young workers and seniors to ensure that substantial numbers of employees can afford to purchase homes and live within proposed projects. We also ask that project proponents be encouraged to provide job information on jobs provided along with housing development phases.

We look forward to reviewing the traffic study. We expect to receive a copy from the State Clearinghouse when the Draft EIR is completed. However, to expedite the review process, and clarify any misunderstandings, you may send a copy in advance to the undersigned

If you have any questions, please feel free to contact Miya Edmonson the project coordinator at (213) 897-6536 and refer to GTS# 07-LA-2017-00625ME.

Sincerely,

DIANNA WATSON, Branch Chief
LD-IGR/CEQA Review

cc: Scott Morgan, State Clearinghouse

Tal Harari <tal.harari@lacity.org>

Fwd: DOWNTOWN PLANNING EIR SCOPING MEETING

1 message

Bryan Eck <bryan.eck@lacity.org> Fri, Mar 3, 2017 at 11:16 AM
To: Tal Harari <tal.harari@lacity.org>

EIR Comments.

——— Forwarded message ———
From: <gkrajeck@aol.com>
Date: Thu, Feb 23, 2017 at 11:09 AM
Subject: DOWNTOWN PLANNING EIR SCOPING MEETING
To: bryan.eck@lacity.org
Cc: gkrajeck@aol.com

Mr. Bryan Eck
Department of City Planning
200 N Spring St CH Room 667
Los Angeles CA 90012

Dear Bryan,
As a resident and homeowner who has lived in DTLA since 2006 I participated in many planning meetings with the former CRA when DTLA was in the beginning stages of massive growth. I notice that little, if any, of the early community input is included in the planning decisions as put forth in your new EIR Planning proposal nor in the development projects that have been approved over the last decade.

It is important that you hold community meetings and ask what residents and stakeholders want, but the reality is, the developers are the ones making the decisions and their development decisions are based on quick profit and with no intention of creating innovative living neighborhoods. Meanwhile the elected officials and neighborhood representatives have little incentive to demand thoughtful long-term urban planning.

Your job is to make sure all of this new development turns into viable communities and not future ghettos. Several of the members from SP-DTLA and area residents and stakeholders went to the EIR Scoping meeting but the staff in attendance were not aware of many details regarding the proposed changes.

Here are some comments regarding the EIR scoping meeting draft plans:

- Call the traditional zone the Historic Core as it has always been called. The Historic Core name more accurately reflects the architecture and the history of the area and has significant impact and importance for the Historic Core and the Historic Core Overlay. Calling it a different name will only cause confusion with past plans.

- The Historic Core Overlay seems to be missing in these draft planning documents and should be included.

- Enforce a "zone of respect" around historic monuments and buildings. These DTLA historic buildings are a major incentive for people to come downtown to live, work, and for entertainment.

- Extend the traditional zone i.e.: Historic Core to City Hall - or at least, up to and include 2nd street and in particular the Higgins Building.

- Extend the traditional zone i.e. Historic Core to include the entire blocks between Hill and Broadway and include Spring, and Main to Los Angeles Streets.

- Where are the parks and open spaces and public spaces for all the tenants and residents that will be living in the new apartments? Include open space and public space and plazas in the plan (and with new developments).

- Add more parks.

- Where is the innovative architecture? All the new buildings look the same (even if the tops are not flat).
Eight to ten stories of parking with 20-50 stories of a steel and glass box on top - with no plazas or public spaces or art.

-Include more interesting and innovative designs for approved projects and include public spaces.

- Do not allow more than one building per design - no more cookie-cutter buildings covering block after block especially in the Historic Core and most notably on Broadway.

- What will this downtown look like in 10-50 years?
What kind of neighborhoods are you creating?

This is such an exciting opportunity to create a living innovative well-designed downtown. Don't allow it to turn into mundane thoughtless infill and don't destroy the historic buildings by overshadowing them with dismal new structures that obstruct and possibly damages the historic architectural treasures we are so fortunate to have in our midst.

Please make sure that I am personally notified of all the future opportunities to shape the specifics of the plan.

Sincerely,

Geralynn Krajeck
SPDTLA Board Member
DTLA Resident and Homeowner
849 S Broadway #904
LA CA 90014
gkrajeck@aol.com
310-920-1468

–

BRYAN ECK
CITY PLANNER

DEPARTMENT OF CITY PLANNING
Community Planning Bureau | Downtown Community Planning
P 213.978.1304
E bryan.eck@lacity.org
200 N. Spring St., Room 667
Los Angeles, CA 90012
www.dtla2040.org

CALIFORNIA
High-Speed Rail Authority

March 10, 2017

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EDMUND G. BROWN JR.
GOVERNOR

City of Los Angeles, Department of City Planning
ATTN: Bryan Eck, City Planner
Case Numbers: CPC-2017-432-CPU; ENV-2017-433-EIR
200 N. Spring Street, Room 667
Los Angeles, CA 90012

Dear Mr. Eck:

Thank you for notifying the California High-Speed Rail Authority (Authority) of the preparation of an Environmental Impact Report (EIR) for a Project to update the Central City Community Plan and the Central City North Community Plan (Downtown Plans) and adopt new zoning regulations as part of the re:code LA program. We appreciate the city's efforts to plan for the future of downtown Los Angeles and look forward to working with you to leverage land use opportunities around Los Angeles Union Station (LAUS), which high-speed rail plans to share in the future. We appreciate inclusion in your planning and environmental review processes and acknowledge the efforts the City has made to include local stakeholders like the Authority in the development of the City's vision for downtown Los Angeles. Our response to the Notice of Preparation (NOP) is to express support for updating the Downtown Plans and share information about the Authority's environmental studies.

The exciting location covered by the Downtown Plans includes El Pueblo, Chinatown, Little Tokyo, the Civic Center, Boyle Heights, the Arts District, Bunker Hill, Los Angeles State Historic Park, and the Los Angeles River. This historic and diverse part of Los Angeles is on the cusp of transformation. The Authority has already committed to partnering with local stakeholders on several ongoing activities:

- The Union Station/Civic Center Exploratory Taskforce (Taskforce) to implement the Los Angeles Union Station/Civic Center Sustainable and Equitable Transit Oriented Community Study (Grant Study) which is being funded by Southern California Association of Governments (SCAG) in partnership with Los Angeles County Metropolitan Transportation Authority (Metro).
- A proposal to the Environmental Protection Agency to complete environmental site assessments and site planning on properties around LAUS in order to prepare parcels for redevelopment (funding announcement expected in spring 2017), in partnership with Metro and Los Angeles – San Diego – San Luis Obispo Rail Corridor Agency (LOSSAN Agency).

- Planning and environmental review for the Link Union Station project that will construct new run-through tracks over the US-101 freeway, reconfigure the station entry tracks and station platform area, construct a new passenger concourse, construct a new loop track, and provide accommodation for high-speed rail at LAUS in the future, in partnership with Metro.
- Collaboration on the One Water LA initiative and Los Angeles River revitalization efforts in partnership with the City of Los Angeles family.

These efforts will coordinate and harness multi-jurisdictional planning and infrastructure investments to create actionable strategies that support equity, sustainability, housing, jobs, and mobility. We support high-value investment in the Union Station/Civic Center area occurring in a manner that matches the vision for a vibrant, mixed-use, walkable and bikeable place that transforms the existing underutilized land into a regional destination anchored by robust transportation choices and creative, educational, and economic vitality. We look forward to coordinating with you on these exciting and important initiatives as you work to update the Downtown Plans. We encourage the City to consider and analyze land use scenarios that take full advantage of the unique conditions around LAUS in order to accommodate growth and economic development for the benefit of downtown Los Angeles and the Southern California region.

The Authority plans to circulate the Burbank to Los Angeles and Los Angeles to Anaheim Draft Environmental Impact Reports/Environmental Impact Statements (Draft EIR/EIS) in 2017 and our current projection is to complete the environmental process in 2018. The Authority is committed to working closely with you and your planning and environmental consultant team to provide information about the high-speed rail project. We appreciate your support and coordination as we prepare the Authority's EIR/EIS documents.

If you have any questions or concerns, please contact me or Michelle Boehm, Southern California Regional Director, at (213) 628-8024 or michelle.boehm@hsr.ca.gov.

Sincerely,

Melissa Elefante DuMond, AICP
Director of Planning and Integration
(916) 403-2583
melissa.dumond@hsr.ca.gov

Tal Harari <tal.harari@lacity.org>

Fwd: LTCC Comment for Downtown Community Plan DEIR

Bryan Eck <bryan.eck@lacity.org> Mon, Mar 6, 2017 at 4:50 PM
To: Tal Harari <tal.harari@lacity.org>

——— Forwarded message ———
From: **Kristin Fukushima** <kristin@littletokyola.org>
Date: Mon, Mar 6, 2017 at 4:49 PM
Subject: LTCC Comment for Downtown Community Plan DEIR
To: Bryan Eck <bryan.eck@lacity.org>

Hi Bryan,

This is a comment on behalf of Little Tokyo Community Council for the Draft Environmental Impact Report for the Downtown Community Plans, City Case No. CPC-2017-432-CPU & ENV-2017-433-EIR.

The Little Tokyo Community Council is the 501(c)(3) nonprofit community coalition of businesses, residents, community and religious institutions, and other vested stakeholders in the Little Tokyo community, with 90+ members. We serve as an advocate on behalf of the Little Tokyo community and provide an inclusive space so that Little Tokyo can speak with one voice to affect positive change for Little Tokyo.

LTCC has worked with the Department of City Planning and other city entities for several years now, partnering to create shared goals for planning projects so as to ensure mutual benefits. We appreciate this strong working relationship, as well as the interconnectedness of issues between the Little Tokyo community and larger Downtown area.

In regards to the EIR Scoping for the Downtown Community Plans, we have three main comments.

1. We urge that the EIR of the Downtown Community Plans include a robust and comprehensive displacement analysis. We understand this is research already taken place in order to evaluate Measure JJJ and determining areas of Los Angeles where we have lost population due to a variety of factors including the rise in housing costs. However, more research and analysis is needed. Please include small businesses in this displacement study, and include this in the Population and Housing section - this is very important for Little Tokyo.

2. We ask that the Department of City Planning include an evaluation of the Downtown Community Plans' consistency with Measure JJJ in order to not have to make further changes down the line and create a Community Plan that can work to promote density with equity incentives.

3. We would like the EIR to assess the impact of implementing a new zoning code (re:Code). In particular, we would like to know the risk of the implementation of a new zone designation and how it would change the base allowable density if and how it would interfere with the density bonus and other affordable housing incentive programs.

4. As with all city-initiated planning processes, we encourage a robust and thorough community engagement process, that centers the existing communities and their needs and visions. We recommend community and neighborhood specific meetings for the various Downtown stakeholders, and on behalf of Little Tokyo, will be expecting coordination and communication as this process continues.

Thank you for your consideration. I'm happy to be reached for any additional comments.

Thanks,
Kristin

–
Kristin Fukushima
Managing Director

Little Tokyo Community Council
T: (562) 895-3295
E: kristin@littletokyola.org
www.littletokyola.org
www.sustainablelittletokyo.org
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–
BRYAN ECK
CITY PLANNER

DEPARTMENT OF CITY PLANNING
Community Planning Bureau | Downtown Community Planning
P 213.978.1304
E bryan.eck@lacity.org
200 N. Spring St., Room 667
Los Angeles, CA 90012
www.dtla2040.org

Tal Harari <tal.harari@lacity.org>

LTSC Public Comment for the Downtown Community Plan Draft EIR Scoping

Rey Fukuda Salinas <rfukuda@ltsc.org> Mon, Mar 6, 2017 at 4:38 PM
To: Bryan Eck <bryan.eck@lacity.org>
Cc: Tal Harari <tal.harari@lacity.org>, Kristin Fukushima <kristin@littletokyola.org>, Grant Sunoo <gsunoo@ltsc.org>

Bryan,
This is a comment on behalf of Little Tokyo Service Center for the Draft Environmental Impact Report for the Downtown Community Plans, City Case No. CPC-2017-432-CPU & ENV-2017-433-EIR.

The Little Tokyo Service Center is a Community Development Corporation (LTSC CDC), whose mission is to meet the critical needs of people and to build community. Founded in 1979, LTSC CDC, has been an important resource for the residents of a diverse community. LTSC CDC is a nonprofit charitable organization serving Asian and Pacific Islanders throughout Los Angeles County who are in need, especially those facing language or cultural gaps, financial need, or physical disabilities. Our offices and roots are based in Little Tokyo, and we are very much invested in the future development of Little Tokyo and the broader Downtown area. In regards to the EIR Scoping for the Downtown Community Plans, we have three main comments.

1. We urge that the EIR of the Downtown Community Plans include a robust and comprehensive displacement analysis. We understand this is research already taken place in order to evaluate Measure JJJ and determining areas of Los Angeles where we have lost population due to a variety of factors including the rise in housing costs. A similar study could be included and could be deepened since it is in a focused area.

2. We ask that the Department of City Planning include an evaluation of the Downtown Community Plans' consistency with Measure JJJ in order to not have to make further changes down the line and create a Community Plan that can work to promote density with equity incentives.

3. We would like the EIR to assess the impact of implementing a new zoning code (re:Code). In particular, we would like to know the risk of the implementation of a new zone designation and how it would change the base allowable density, and if and how it would interfere with the density bonus and other affordable housing incentive programs.

Thank you for your consideration. I'm happy to be reached for any questions.

–
sincerely,

Rey Fukuda (pronouns: he, they) | **Project Manager & Planner**
213-473-1609 | rfukuda@ltsc.org

LITTLE TOKYO SERVICE CENTER | *Positive Change for People and Places*
231 E Third Street, G-106 Los Angeles, CA 90013 | www.ltsc.org

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Tal Harari <tal.harari@lacity.org>

Fwd: Mack Urban: Central City Community Plan Update - EIR Scope Comments

2 messages

Bryan Eck <bryan.eck@lacity.org> Fri, Mar 31, 2017 at 3:59 PM
To: Tal Harari <tal.harari@lacity.org>

For the file. Thanks!

---------- Forwarded message ----------
From: **Mark Wareham** <mwareham@mackurban.com>
Date: Thu, Mar 30, 2017 at 3:18 PM
Subject: Mack Urban: Central City Community Plan Update - EIR Scope Comments
To: Bryan Eck <bryan.eck@lacity.org>

Good Afternoon Bryan,

We look forward to working with the Planning Department regarding the ongoing updates to the Central City Community Plan, revisions to the Downtown Zoning Code, and amendments to the General Plan Elements.

Towards this end, please find herewith our comments pertaining to the EIR Scoping Meeting convened on February 16th, 2017.

We will gladly make ourselves available to meet and discuss any questions you may have regarding our comments and to give you feedback and input along the way.

Best Regards,

Mark

MARK A. WAREHAM

Senior Vice President, Planning & Design

1150 S. Olive, Suite 2250

Los Angeles, CA 90015

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MACK URBAN

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BRYAN ECK
CITY PLANNER
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Mack Urban EIR Scope Comments 3-30-2017.pdf
453K

Tal Harari <tal.harari@lacity.org> Wed, Apr 5, 2017 at 9:53 AM
Draft To: Bryan Eck <bryan.eck@lacity.org>

Received.

Thanks!
[Quoted text hidden]
--

TAL HARARI | Planning Associate
213.978.1204 | tal.harari@lacity.org
Los Angeles Department of City Planning
200 N. Spring St., Room 667
Los Angeles, CA 90012
www.dtla2040.org

Please note that I am out of the office every other Friday.

MACK URBAN

Investment. Planning. Development. Management.

March 29, 2017

Department of City Planning
200 North Spring Street, Room 667
Los Angeles, California 90012
Attention: Mr. Bryan Eck, City Planner

Re: Central City Community Plan Update; EIR Scope Comments
Case Nos.: CPC-2017-432-CUP; ENV-2017-433-EIR

Dear Mr. Eck:

Thank you for this opportunity to comment on the scope of the environmental review for the Central City Community Plan Update.

Mack Urban is a diversified real estate developer with large-scale residential developments in Los Angeles and Seattle. We purchased six acres of land in the South Park neighborhood of Downtown Los Angeles in 2013. The five development sites can accommodate up to 1,900 residential units with full amenities and ample open spaces. We presently have two major residential projects under construction in South Park, which we refer to as Sites 1 and 4, and which are described below. Mack Urban also owns three additional sites in South Park (referred to as Sites 1A, 2 and 3), which we are presently planning with a goal of submitting for entitlements in the near future.

Based on our experience with developing Sites 1 and 4, and our plans for Sites 1A, 2 and 3, we want to provide you with our thoughts regarding the Central City Community Plan Update as well as its associated programs, such as the Downtown Zoning Code and re-code LA. We believe that this experience can be very useful to the Planning Department as it updates the Community Plan and creates the Downtown Zoning Code.

A. Development of Site 1 and Site 4.

By way of background, Sites 1 and 4 are presently under construction. The following is a summary of these projects:

(1) Site 1 Project Description. Site 1 is located on the property bounded by Grand Avenue on the west, 12th Street on the south, the alley between Grand

Avenue and Olive Street on the east, and an adjacent property to the north (its location is shown on the map attached as Exhibit 1). Site 1 is 1.74 acres in size. It is zoned [Q]R5-4D-O and is presently designated for High Density Residential land use in the Central City Community Plan. Mack Urban is presently constructing a 38-story residential mixed-use building that will include 536 apartment units with the following unit mix: 23 studios, 371 one-bedrooms, 139 two-bedrooms, and 3 penthouse units. The apartment building will be 392 feet tall and the project will have an FAR of 6.66:1. The project includes 14,061 square feet of ground floor retail space.

The project has a total of 53,000 square feet of open space including an 8,650 square foot park located on the northern portion of the site and a 5,374 square foot mid-block paseo connecting Grand Avenue to the interior alley. The project has extensive amenities including a fitness center, locker rooms, pool, spa, indoor and outdoor lounges, business center, yoga room, outdoor seating areas, and meeting and dining rooms.

The project will be parked on-site at the rate of 1 space for each unit with 3 or less habitable rooms, 1.25 parking spaces for each unit with more than 3 habitable rooms, and 1 space for each 1,000 square feet of commercial space, subject to a 15% reduction in required parking for meeting bicycle parking requirements. The parking structure will include approximately 801 parking spaces and has 2 levels below grade and 4 levels above ground level retail. The project will incorporate a portion of the adjacent alley as a paseo, which is being vacated pursuant to a tract map.

(2) Site 4 Project Description. Construction of the Site 4 project is nearing completion, with a certificate of occupancy expected to be issued in April 2017. This project is bordered by Pico Boulevard on the south, Olive Street on the west, Hill Street on the east, and adjacent properties to the north (its location is shown on the map attached as Exhibit 1). The project incorporates the vacation of the alley separating the two parts of the project to create shared open space and the opportunity for a paseo connecting Pico Boulevard and 12th Street. Site 4 is approximately 1.86 acres in size. The project is zoned C2-4D-O, which allows an FAR of up to 6.0:1, and is designated Regional Center Commercial in the Central City Community Plan.

The Site 4 project consists of a 7-story residential mixed-use building that will include 362 apartment units with the following unit mix: 105 studios, 193 one-bedrooms, 58 two-bedrooms, and 6 three-bedroom units. The apartment building will be up to 90 feet tall and the project will have an FAR of 4.12:1. The project includes 4,000 square feet of ground floor retail space.

The Site 4 project has a total of 37,025 square feet of open space, including a 6,532 square foot area with a park, residential lobby amenities, and dog runs on the

ground floor. The project has extensive amenities including a gym, locker room, indoor lounge, outdoor courtyard with barbeque stations, and a business center.

The Site 4 project will be parked on-site at the rate of 1 space for each unit with 3 or less habitable rooms, 1.25 parking spaces for each unit with more than 3 habitable rooms, and 1 space for each 1,000 square feet of commercial space, subject to a 15% reduction in required parking for meeting bicycle parking requirements. The parking structure will include approximately 382 parking spaces and has 2 levels below grade.

B. Critical Site 1 and Site 4 Development Policies:

As noted above, the development of Sites 1 and 4 are excellent case studies involving the policies affecting residential development in South Park. The following is a summary of the factors that were necessary for their development:

(1) Base Level of FAR. In the case of Site 1, the project site was zoned for a maximum of 6.0:1 FAR for the project site. As to Site 4, the site was zoned for up to 6:1 FAR. Without each site having entitlements for a substantial minimum FAR, the projects would not have been economically feasible.

(2) TFAR. In the case of Site 1, the ability to increase the floor area of the project by the use of TFAR allowed us to receive 49,999 square feet of floor area using the streamlined process of a director's determination, which substantially improved the project's feasibility.

(3) Downtown Housing Incentives. The Greater Downtown Housing Incentive provisions greatly benefited both projects, particularly the elimination of the density limitation for residential development and the yard requirements, the method for calculating buildable area, and the flexibility with respect to common or private open space.

(4) Parking Requirements. The reduced parking requirements in the Central City area are particularly important for the feasibility of these projects. However, in light of the public transit options available and the walkability of downtown Los Angeles, it is clear that the parking requirements can be reduced further as well as more flexibility provided for off-site parking options.

(5) Floor Area Averaging. The ability to average the floor area ratio across multiple sites in a unified development under Section 12.24.W(19) is also very useful in creating integrated developments with paseos and other pedestrian linkages.

Without these beneficial provisions, we would not have been able to develop Site 1 with the height, density and open space that make this a unique project. We strongly urge the City to retain these beneficial policies in the Downtown Zoning Code.

At the same time, there are numerous Zoning Code provisions that constrained the Site 1 and Site 4 projects, including the following:

(1) Tree Requirements. Both projects were subject to an unrealistic requirement for a large number of trees on the site, which in the case of Site 1 were 167 trees.

(2) Alley Vacations. Both projects include the creation of paseos and shared open space by the vacation of an alley. However, both projects experienced difficulties in obtaining the necessary approvals from various City departments in order to vacate and transform the alleys with enhanced paving, landscape, and lighting consistent with the Green Alley Pilot Project Designation.

(3) Street Scape Plan. South Park lacks a uniform street scape plan with tree plantings, street furniture, and other features that are necessary to unify the appearance of different projects through the area. A uniform street scape plan for South Park would greatly improve the visual sense of neighborhood for the area. Both projects also experienced difficulties in obtaining the necessary approvals from various City departments in order to expand the urban forest downtown by maximizing the number of street trees and selecting tree species providing a canopy for pedestrians.

(4) Parking Requirements. As noted above, the Planning Department should explore additional ways to reduce the on-site parking requirements in South Park.

(5) Downtown Design Guide and Street Standards. Although the Downtown Design Guide and Street Standards include important standards, the Planning Department and Transportation Department staff should have greater flexibility in allowing exceptions to the Guidelines and updated Street Standards when a better solution is demonstrated or where the Guideline is not relevant.

(6) Environmental Review. The Site 1 and Site 4 projects were entitled through the use of a Mitigated Negative Declaration. We hope that the program EIR being prepared for the Community Plan Updates will provide the opportunity to allow subsequent individual projects to use the program EIR to streamline environmental review.

We urge the Planning Department to address these issues in the Downtown Zoning Code.

C. Mack Urban's Future South Park Projects.

As noted above, Mack Urban is planning the development of three other nearby sites in South Park, designated Sites 1A, Site 2 and Site 3. All of these sites are shown

on the map attached as Exhibit A. Although our planning for these sites is still preliminary, we want to describe these sites and provide you with a summary of our current thinking about their development.

(1) Site 1A. Site 1A is approximately 17,933 square feet in area and is located at the northwest corner of Olive Street and 12th Street. Site 1A is zoned C2-4D-O, with a maximum FAR of 6:1, and is designated Regional Center Commercial in the Central City Community Plan. Site 1A is adjacent to Site 1, across the alley that separates the two. Site 1A was entitled with Site 1 as part of a unified mixed-use development. Despite the 6.0:1 FAR, because Site 1A is relatively small and constrained as to parking, it presents a number of development challenges. Mack Urban is presently considering a hotel for Site 1A as the second phase of the unified development, with approximately 215 rooms that would be built to at least a 6.0:1 FAR.

(2) Site 2. Site 2 is 36,120 square feet in area. It is located at the southwest corner of Olive Street and 11th Street and is adjacent to the northern portion of Site 1, thereby creating the opportunity to connect these projects by converting the alley to a paseo. Site 2 is zoned C2-4D-O, with a maximum FAR of 6.0:1, and is designated Regional Center Commercial in the Central City Community Plan.

Mack Urban is considering developing this site with a residential mixed-use tower of up to 50 stories, with ground floor retail, approximately 720,000 square feet of gross residential floor area, and approximately 570 dwelling units.

(3) Site 3. Site 3 is 46,807 square feet in area. It is located at the southeast corner of Olive Street and 11th Street and directly across Olive Street from Site 2. Site 3 is zoned C2-4D-O, with a maximum FAR of 6:1, and is designated Regional Center Commercial in the Central City Community Plan.

We are presently studying this site for an 8-story, mid-rise residential development with ground floor retail, approximately 210,000 square feet of gross residential floor area and 215 dwelling units. However, we may elect to pursue entitlements for a high-rise tower on this site.

Under these preliminary studies, the total gross residential floor area of Site 2 and Site 3 would be approximately 970,000 square feet and would yield a combined FAR of approximately 10.0:1. As a result, an approval of a substantial TFAR would be required and the projects may need to be entitled as a unified project in order to average the floor area across both parcels.

As noted above, it is essential that a sufficiently high FAR be provided for these sites because it is necessary to permit these sites to be developed to their full potential.

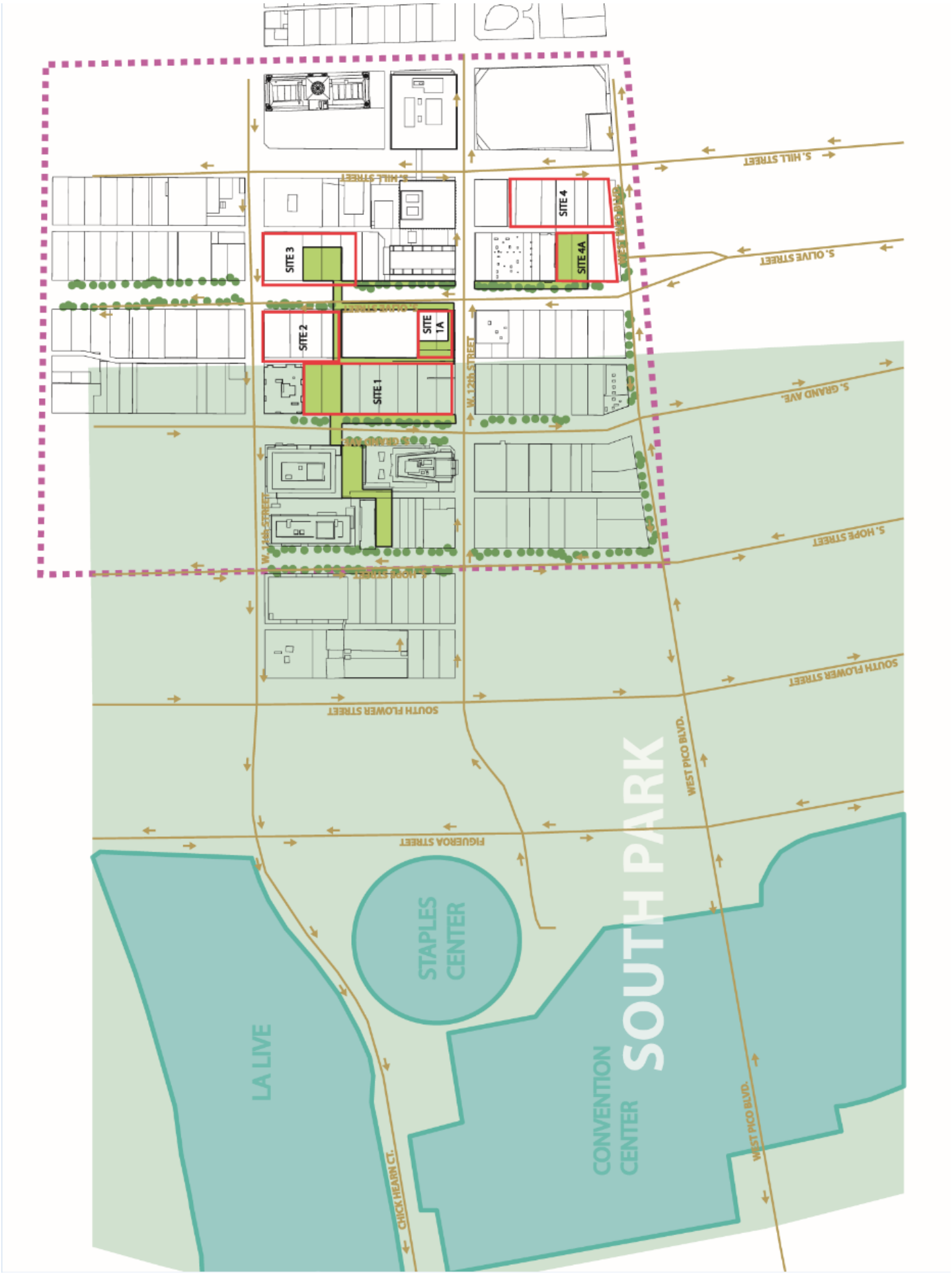
We recommend that the existing "D" condition limitations be removed and the original 13.0:1 FAR be restored for these sites.

We ask that you consider the above-mentioned entitlement approvals and intended development of all our South Park sites to make sure that the Central City Community Plan Update, as well as the Downtown Zoning Code, Downtown Design Guide, and Downtown Street Standards do not inadvertently make these sites non-conforming. We look forward to working with you on the development of the Central City Community Plan, the Downtown Zoning Code, and the future planning and entitlements of the Mack Urban Sites 1A, 2, and 3 in South Park.

Very Truly Yours,

Mark Wareham
Sr. VP Planning & Design
Mack Urban, LLC

Exhibit 1


SITE 3
SITE 4
SITE 4A
SITE 2
SITE 1A
SITE 1
S. HILL STREET
S. OLIVE STREET
S. GRAND AVE.
S. HOPE STREET
SOUTH FLOWER STREET
WEST PICO BLVD.
FIGUEROA STREET
W. 12th STREET
W. 14th STREET
STAPLES CENTER
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Los Angeles County
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Metro

March 3, 2017

Bryan D. Eck
City of Los Angeles
Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, CA 90012

RE: Notice of Preparation of a Combined Draft Environmental Impact Report for Updates to the Central City and Central City North Community Plans, and Amendments to the City of Los Angeles Municipal Code to Adopt a New Zoning Code for the Central City and Central City North Community Plan Areas (as part of the *Re:CodeLA* Project)

Dear Mr. Eck

Thank you for the opportunity to comment on the Central City and Central City North Community Plan Updates project. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency's statutory responsibility in relation to our facilities and services that may be affected by the proposed project.

Metro is committed to working with stakeholders across the County to support the development of transit oriented communities (TOCs). TOCs are built by considering transit within a broader community and creating vibrant, compact, walkable, and bikeable places centered around transit stations and hubs with the goal of encouraging the use of transit and other alternatives to driving. Metro looks forward to collaborating with local municipalities, developers, and other stakeholders in their land use planning and development efforts, and to find partnerships that support TOCs across Los Angeles County.

Project Location

The Project location is the Central City Community Plan Area and the Central City North Community Plan Area ("Downtown Plan Area" or "Project Area"). The Downtown Plan Area is geographically contiguous, sharing a common boundary along Alameda Street. The Central City Community Plan Area (CPA) is comprised of approximately 2,161 acres, and is generally bounded on the north by Sunset Boulevard/Cesar Chavez Avenue, on the south by the Santa Monica Freeway (Interstate 10), on the west by the Harbor Freeway (Interstate 110), and on the east by Alameda Street. Immediately to the east of Alameda Street is the Central City North CPA. The Central City North CPA is comprised of approximately 2,005 acres, and is generally bounded on the north by Stadium Way, Lilac Terrace, and North Broadway, on the south by the City of Vernon, on the west by Alameda Street, and on the east by the Los Angeles River. The Project Area is bordered by the communities of Boyle Heights, Silver Lake-Echo Park, Westlake, Southeast and South Los Angeles, and the City of Vernon.

Project Description

The proposed Project includes the updates to the Downtown Plans, adoption of the Downtown Zoning Code, and the adoption of necessary revisions and any other amendments necessary to implement the above, including amendments to other General Plan elements (such as Mobility and Framework), the LAMC, specific plans, and other ordinances to implement those updates.

Metro Comments

Bus Operations

Several Metro bus lines operate within the CPAs. For example, in the Central City CPA, Metro operates bus lines on Alameda Street, Los Angeles Street, Temple Street, Main Street, Spring Street, Broadway, Hill Street, Olive Street, Grand Avenue, Figueroa Street, 1st Street, 5th Street, 6th Street, Wilshire Boulevard, 7th Street, 8th Street, 9th Street, Olympic Boulevard, & Pico Boulevard. In the Central City North CPA, Metro operates bus lines on Santa Fe Avenue, Olympic Boulevard, 1st Street, Main Street, Vignes Street, College Street, Broadway, and Hill Street. The CPAs represent the core of Metro's bus system, it is vital that these bus lines are considered as these updates are developed.

Many residents and businesses in the CPAs rely on Metro's bus service as their primary mode of transport, it is critical to maintain reliability and predictability for patrons. Metro strongly recommends that bus operations be considered as any roadway modifications are advanced, in particular those that result in roadway narrowing and/or travel lane reductions.

Metro requests that the City continue to coordinate with Metro prior to advancing any improvements that may affect bus operations. Metro supports active transportation and improved first/last mile connections. However, it is critical that bus operations be taken into consideration as projects are advanced. We welcome the ongoing coordination with the City of Los Angeles and improving multi-modal connections.

Additionally, Metro has standard language that relates to construction activity adjacent to bus transit facilities. Please ensure that existing Metro bus stops and Metro bus layover zones are maintained. Furthermore, Metro recommends that the Community Plans include language that informs future development activity within the Community Plan of Metro's notification procedures and considerations for projects located in close proximity to a Metro facility that may impact Metro bus operations.

Metro Rail Operations

Several Metro light rail lines (Blue, Expo, Gold, Purple, & Red) currently operate weekday peak service as often as every five minutes in both directions and trains may operate, in and out of revenue service, 24 hours a day, seven days a week in the ROW proximate to the CPAs. Additionally, the Regional Connector (under construction) will run in underground tunnels within the CPAs. Metrolink lines run to and from Union Station as well. Metro has an Adjacent Construction Design Manual that describes the Metro's development project review process and considerations for project siting as it relates to Metro facilities. Metro suggests that the project sponsor include policy language or guidance in the Community Plans that clearly denotes development occurring within 100 feet of a Metro facility will require Metro review and approval, including compliance with Metro's Development Guidelines, that a

recorded Noise Easement Deed in favor of Metro is required, and that any noise mitigation required for projects must be borne by the developers of those projects and not Metro. In particular, because of the proximity to the Metro light rail lines, increased traffic at railroad grade crossings must be considered. Provisions for transit priority treatments should be considered to make the development welcoming to transit access.

Furthermore, the West Santa Ana Branch (WSAB) is exploring an alignment along Alameda Street and 7th Street as an alternative in the environmental study. This should be coordinated as part of the Community Plan process and any development project design and construction in this vicinity should be coordinated with Metro's West Santa Ana Branch Team. Please contact Fanny Pan, Senior Director, at 213-922-3070 for all WSAB coordination efforts.

Transit Orientation and Active Transportation

Metro strongly recommends that the Community Plans include a minimum five (5) foot setback from the Metro ROW to ensure that property owners can maintain their property without entering Metro property. Additionally, policies should encourage transit-supportive public realm improvements, such as wide sidewalks, bicycle facilities with safe connections to/from transit, bus shelters, comfortable seating, landscaping (i.e., street trees that provide continuous shade along transit access routes); way finding signage (directing pedestrians to transit stops and stations, and from transit facilities to points of interest in the surrounding neighborhood); and enhanced, ADA-compliant street crossing elements adjacent to transit stops and stations (i.e., enhanced crosswalks, crossing signals, and accessible ramps).

To further advance first last mile connections within the CPAs, Metro recommends that the Community Plan Updates include the Connect US Action Plan. The Connect US Action Plan (Connect US) is a community-driven active transportation plan that prioritizes pedestrian and bicyclist connections to and from Los Angeles Union Station, the 1st/Central Regional Connector Station, and the surrounding historic and culturally significant communities. Connect US was developed in partnership with Metro, the City of Los Angeles, and community stakeholders. Connect US includes a series of active transportation improvements that can be implemented within the existing City of Los Angeles public-right-of-way. Metro strongly recommends that the Connect US Action Plan be embedded within and adopted within the Community Plan Updates or that a comparable path to adoption is identified.

Los Angeles Union Station

Los Angeles Union Station (LAUS) is the hub and the underpinning element of Metro's public transportation system. The LAUS property is cited within the Central City North Community Plan Area and is adjacent to the Central City Community Plan Area. Metro appreciates that the DTLA 2040 effort highlights the robust and significant transportation infrastructure that is in place and under construction in the Plan Areas. Metro supports the creation of General Plan Land Use Designations that prioritize growth around transit infrastructure such as the Transit Core (with the highest allowable FAR of all designations) and Transit Edge designations. Additionally, Metro supports the inclusion of a core principle that calls for *'Promoting a transit, bicycle, and pedestrian friendly environment'* and the creation of linkages between districts, the Connect US Action Plan is an example of how this can be achieved in the Plan Areas.

Consistent with the creation of the Transit Core and Transit Edge land use designations and the existing Framework Element of the General Plan, Metro would like to recommend that policy language is included in the Plans that speak to the significance that prioritizing growth near transit and advancing comprehensive transit supportive planning efforts have on increasing public transit ridership. Please refer to the Transit Supportive Planning Toolkit, a research-based online resource that identifies10 characteristics of transit supportive places for additional information. The Toolkit can be found at metro.net/projects/tod-toolkit/.

Metro looks forward to continuing to collaborate with the City to effectuate policies and implementation activities that promote transit and active transportation supportive communities. If you have any questions regarding this response, please contact Elizabeth Carvajal at 213-922-3084 or by email at DevReview@metro.net. Metro looks forward to reviewing the Draft Community Plans and the Draft EIR. Please send the documents to the following address:

Metro Development Review
One Gateway Plaza MS 99-23-4
Los Angeles, CA 90012-2952

Sincerely,

Elizabeth Carvajal
Sr. Manager, Transportation Planning

Attachments: Adjacent Construction Design Manual
Noise Easement Deed

RECORDING REQUESTED BY
AND WHEN RECORDED MAIL TO:

LOS ANGELES COUNTY METROPOLITAN
TRANSPORTATION AUTHORITY
Real Estate Department
Deputy Executive Officer - Real Estate
P: 213-922-2415 F: 213-922-2400
One Gateway Plaza, Mail Stop 99-18-4
Los Angeles, CA 90012-2932

Space Above Line for Recorder's Use

[Recordation of this Public Document is Exempt from all Recording Fees and Taxes Pursuant to Government Code Section 6103]

Public Agency - No Tax Statement

NOISE EASEMENT DEED

For valuable consideration, receipt of which is hereby acknowledged, **(Name of Owner)**, a _____ , for themselves, their heirs, administrators, executors, successors, assigns, tenants, and lessees do hereby grant, bargain, sell, and convey to the **LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY,** a public agency existing under the authority of the laws of the State of California ("Grantee"), its successors and assigns, for the use and benefit of the public and its employees, a perpetual, assignable easement in that certain real property in the City of Los Angeles, County of Los Angeles, State of California described in Exhibit "A" attached hereto and incorporated herein by this reference,

Said easement shall encompass and cover the entirety of the Grantors' Property having the same boundaries as the described Property and extending from the sub-surface upwards to the limits of the atmosphere of the earth, the right to cause in said easement area such noise, vibrations, fumes, dust, fuel particles, light, sonic disturbances, and all other effects that may be caused or may have been caused by the operation of public transit vehicles traveling along the Project right of way.

Grantor hereby waives all rights to protest, object to, make a claim or bring suit or action of any purpose, including or not limited to, property damage or personal injuries, against Grantee, its successors and assigns, for any necessary operating and maintenance activities and changes related to the Project which may conflict with Grantors' use of Grantors' property for residential and other purposes, and Grantors hereby grants an easement to the Grantee for such activities.

The granting of said Easement shall also establish the Grantors' right to further modify or develop the Property for any permitted use. However, Grantor's rights of development shall not interfere with the continued operation of Grantee's Project.

It is understood and agreed that these covenants and agreements shall be permanent, perpetual, will run with the land and that notice shall be made to and shall be binding upon all heirs, administrators, executors, successors, assigns, tenants and lessees of the Grantor. The Grantee is hereby expressly granted the right of third party enforcement of this easement.

IN WITNESS WHEREOF, the undersigned has caused its/their signature to be affixed this day of _____, 20___

By: _____
Name

By: _____
Name

(ATTACH NOTARY SEAL AND CERTIFICATE HERE.)

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT **CIVIL CODE § 1189**

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)
County of _____)

On _____ before me, _____,
Date *Here Insert Name and Title of the Officer*

personally appeared _____
Name(s) of Signer(s)

_____,

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature _____
Signature of Notary Public

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Signer's Name: _____
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☐ Partner — ☐ Limited ☐ General
☐ Individual ☐ Attorney in Fact
☐ Trustee ☐ Guardian or Conservator
☐ Other: _____
Signer Is Representing: _____
_____

Signer's Name: _____
☐ Corporate Officer — Title(s): _____
☐ Partner — ☐ Limited ☐ General
☐ Individual ☐ Attorney in Fact
☐ Trustee ☐ Guardian or Conservator
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Signer Is Representing: _____
_____

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CERTIFICATE OF ACCEPTANCE

This is to certify that the interest in the real property conveyed by the foregoing Grant Deed from _____, a **California Limited Partnership**, ("Grantor") to **LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY,** a public agency existing under the authority of the laws of the State of California ("LACMTA"), is hereby accepted by the undersigned on behalf of the LACMTA pursuant to authority conferred by resolution of the Board of Directors of the LACMTA, and the Grantee hereby consents to the recordation of this Deed by its duly authorized officer.

Dated this ____ day of _____, 20__

By: _____
Velma C. Marshall
Deputy Executive Officer - Real Estate

ADJACENT CONSTRUCTION DESIGN MANUAL

1.0 INTRODUCTION

1.1 Parties planning construction over, under or adjacent to a Metropolitan Transportation Authority (MTA) facility or structure are advised to submit for review seven (7) copies of their drawings and four (4) copies of their calculations showing the relationship between their project and the MTA facilities, for MTA review. The purpose of the MTA review is to reduce the chance of conflict, damage, and unnecessary remedial measures for both MTA and the parties. Parties are defined as developers, agencies, municipalities, property owners or similar organizations proposing to perform or sponsor construction work near MTA facilities.

1.2 Sufficient drawings and details shall be submitted at each level of completion such as Preliminary, In-Progress, Pre-final and Final, etc. to facilitate the review of the effects that the proposed project may or may not have on the MTA facilities. An MTA review requires internal circulation of the construction drawings to concerned departments (usually includes Construction, Operations, Maintenance, and Real Estate). Parties shall be responsible for all costs related to drawing reviews by MTA. MTA costs shall be based upon the actual hours taken for review at the hourly rate of pay plus overhead charges. Drawings normally required for review are:

A. Site Plan

B. Drainage Area Maps and Drainage Calculations

C. Architectural drawings

D. Structural drawings and calculations

E. Civil Drawings

F. Utility Drawings

G. Sections showing Foundations and MTA Structures

H. Column Load Tables

I. Pertinent Drawings and calculations detailing an impact on MTA facilities

J. A copy of the Geotechnical Report.

K. Construction zone traffic safety and detour plans: Provide and regulate positive traffic guidance and definition for vehicular and pedestrian traffic adjacent to the construction site to ensure traffic safety and reduce adverse traffic circulation impact.

L. Drawings and calculations should be sent to:

MTA Third Party Administration (Permits Administration)
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, California 90012

1.3 If uncertainty exists on the possible impacts a project may have on the MTA facilities, and before submitting a formal letter requesting a review of a construction project adjacent to the Metro System, the party or his agent may contact the MTA Third Party Administrator (Permits). The Party shall review the complexity of the project, and receive an informal evaluation of the amount of detail required for the MTA review. In those cases, whereby it appears the project will present no risk to MTA, the Third Party Administrator (Permits) shall immediately route the design documents to Construction, Operations, Maintenance, and Real Estate departments for a preliminary evaluation. If it is then confirmed that MTA risk is not present, the Administrator shall process an approval letter to the party.

1.4 A period of 30 working days should be allowed for review of the drawings and calculations. Thirty (30) work days should be allowed for each successive review as required. It is noted that preliminary evaluations are usually produced within 5 working days.

1.5 The party shall reimburse the MTA for any technical review or support services costs incurred that are associated with his/her request for access to the Metro Rail System

1.6 The following items must be completed before starting any construction:

A. Each part of the project's design may be reviewed and approved by the MTA. The prime concern of the MTA is to determine the effect of the project on the MTA structure and its transit operations. A few of the other parts of a project to be considered are overhead protection, dust protection, dewatering, and temporary use of public space for construction activities.

B. Once the Party has received written acceptance of the design of a given project then the Party must notify MTA prior to the start of construction, in accordance with the terms of acceptance.

1.7 Qualified Seismic, Structural and Geotechnical Oversight

The design documents shall note the name of the responsible Structural Engineer and Geotechnical Engineer, licensed in the State of California.

2.0 REVIEW PROCEDURE

2.1 All portions of any proposed design that will have a direct impact on an MTA facility or structure will be reviewed to assure that the MTA facility or structure is not placed in risk at any time, and that the design meets all applicable codes and criteria. Any portion of the proposed design that is to form part of an MTA controlled area shall be designed to meet the MTA Design Criteria and Standards.

2.2 Permits, where required by the local jurisdiction, shall be the responsibility of the party. City of L.A. Dept. of Bldg. and Safety and the Bureau of Engineering permit review shall remain in effect. Party shall refer to MTA Third Party Administration policies and procedures, THD5 for additional information.

2.3 Monitoring of the temporary support of excavation structures for adjacent construction shall be required in all cases for excavations within the geotechnical zone of influence of MTA structures. The extent of the monitoring will vary from case to case.

2.4 Monitoring of the inside of MTA tunnels and structures shall be required when the adjacent

excavation will unload or load the MTA structure or tunnel. Monitoring of vertical and horizontal distortions will include use of extensometers, inclinometers, settlement reference points, tiltmeters, groundwater observation wells, tape extensometer anchor points and load cells, as appropriately required. Acceptable limits of movement will depend on groundwater conditions, soil types and also the length of service the stations and tunnels have gone through. Escorts will be required for the survey parties entering the Metro operating system in accordance with MTA Operating Rules and Procedures. An MTA account number will be established and the costs for the escort monitoring and surveying service will be billed directly to the party or his agent as in section 1.2.

2.5 The calculations submitted for review shall include the following:

A. A concise statement of the problem and the purpose of the calculation.

B. Input data, applicable criteria, clearly stated assumptions and justifying rationale.

C. References to articles, manuals and source material shall be furnished with the calculations.

D. Reference to pertinent codes and standards.

E. Sufficient sketches or drawing references for the work to be easily understood by an independent reviewer. Diagrams indicating data (such as loads and dimensions) shall be included along with adequate sketches of all details not considered standard by MTA.

F. The source or derivation of all equations shall be shown where they are introduced into the calculations.

G. Numerical calculations shall clearly indicate type of measurement unit used.

H. Identify results and conclusions.

I. Calculations shall be neat, orderly, and legible.

2.6 When computer programs are used to perform calculations, the following information shall accompany the calculation, including the following:

A. Program Name.

B. Program Abstract.

C. Program Purpose and Applications.

D. Complete descriptions of assumptions, capabilities and limitations.

E. Instructions for preparing problem data.

F. Instructions for problem execution.

G. List (and explanation) of program acronyms and error messages.

H. Description of deficiencies or uncorrected errors.

I. Description of output options and interpretations.

J. Sample problem(s), illustrating all input and output options and hardware execution statements. Typically, these problems shall be verified problems.

K. Computer printout of all supporting calculations.

L. The "User's Manual" shall also include a certification section. The certification section shall describe the methods and how they cover the permitted options and uses of the program.

2.7 Drawings shall be drawn, to scale, showing the location and relationship of proposed adjacent construction to existing MTA structures at various stages of construction along the entire adjacent alignment. The stresses and deflections induced in the existing MTA structures should be provided.

2.8 The short-term and long-term effects of the new loading due to the adjacent construction on the MTA structures shall be provided. The soil parameters and other pertinent geotechnical criteria contained in existing contract documents for the affected structure, plus any additional conditions shall be used to analyze the existing MTA structures.

2.9 MTA structures shall be analyzed for differential pressure loadings transferred from the adjacent construction site.

3.0 MECHANICAL CRITERIA

3.1 Existing services to MTA facilities, including chilled water and condenser water piping, potable and fire water, storm and sanitary sewer, piping, are not to be used, interrupted nor disturbed without written approval of MTA.

3.2 Surface openings of ventilation shafts, emergency exits serving MTA underground facilities, and ventilation system openings of surface and elevated facilities are not to be blocked or restricted in any manner. Construction dust shall be prevented from entering MTA facilities.

3.3 Hot or foul air, fumes, smoke, steam, etc., from adjacent new or temporary facilities are not to be discharged within 40 feet of existing MTA ventilation system intake shafts, station entrances or portals. Tunnel ventilation shafts are both intake and discharge structures.

3.4 Clear access for the fire department to the MTA fire department connections shall be maintained at all times. Construction signs shall be provided to identify the location of MTA fire department connections. No interruption to fire protection water service will be permitted at any time.

3.5 Modifications to existing MTA mechanical systems and equipment, including ventilation shafts, required by new connections into the MTA System, shall only be permitted with prior review and approval by MTA. If changes are made to MTA property as built drawings shall be provided reflecting these changes.

At the option of MTA, the adjacent construction party shall be required to perform the field tests necessary to verify the adequacy of the modified system and the equipment performance. This verification shall be performed within an agreed time period jointly determined by MTA and the Party on a case by case basis. Where a modification is approved, the party shall be held responsible to maintain original operating capacity of the equipment and the system impacted by the modification.

4.0 OPERATIONAL REQUIREMENTS

4.1 GENERAL

A. Normal construction practices must be augmented to insure adequate safety for the general public entering Metro Stations and riding on Metro Trains and Buses. Design of a building, structure, or facility shall take into account the special safety considerations required for the construction of the facility next to or around an operating transit system.

B. Projects which require working over or adjacent to MTA station entrances shall develop their construction procedures and sequences of work to meet the following minimum requirements:

1. Construction operations shall be planned, scheduled and carried out in a way that will afford the Metro patrons and the general public a clean, safe and orderly access and egress to the station entrance during revenue hours.

2. Construction activities which involve swinging a crane and suspended loads over pedestrian areas, MTA station entrances and escalators, tracks or Metro bus passenger areas shall not be performed during revenue hours. Specific periods or hours shall be granted on a case-by-case basis.

3. All cranes must be stored and secured facing away from energized tracks, when appropriate.

4. All activity must be coordinated through the MTA Track Allocation process in advance of work activity.

4.2 OVERHEAD PROTECTION - Station Entrances

A. Overhead protection from falling objects shall be provided over MTA facilities whenever there is possibility, due to the nature of a construction operation, that an object could fall in or around MTA station entrances, bus stops, elevators, or areas designed for public access to MTA facilities. Erection of the overhead protection for these areas shall be done during MTA non-revenue hours.

1. The design live load for all overhead protection shall be 150 pounds per square foot minimum. The design wind load on the temporary structures shall be 20 pounds per square foot, on the windward and leeward sides of the structure.

2. The overhead protection shall be constructed of fire rated materials. Materials and equipment shall not be stored on the completed shield. The roof of the shield shall be constructed and maintained watertight.

B. Lighting in public areas and around affected MTA facilities shall be provided under the overhead protection to maintain a minimum level of twenty-five (25) footcandles at the escalator treads or at the walking surface. The temporary lighting shall be maintained by the Party.

C. Wooden construction fencing shall be installed at the boundary of the areas with public access. The fencing shall be at least eight-feet high, and shall meet all applicable code requirements.

D. An unrestricted public access path shall be provided at the upper landing of the entrance escalator-way in accordance with the following:

1. A vertical clearance between the walking surface and the lowest projection of the shield shall be 8'-0".

2. A clear pedestrian runoff area extending beyond the escalator newel shall be provided, the least dimension of which shall be twenty (20) feet.

3. A fifteen (15) foot wide strip (other than the sidewalk) shall be maintained on the side of the escalator for circulation when the escalator is pointed away from a street corner.

4. A clear path from any MTA emergency exit to the public street shall be maintained at all times.

E. Temporary sidewalks or pedestrian ways, which will be in use more than 10 days, shall be7constructed of four (4") inch thick Portland cement concrete or four(4") inches of asphaltic concrete placed and finished by a machine.

4.3 OVERHEAD PROTECTION - Operating Right-of-Way Trackage

A. MTA Rail Operations Control Center shall be informed of any intent to work above, on, or under the MTA right-of-way. Crews shall be trained and special flagging operations shall be directed by MTA Rail Operations Control Center. The party shall provide competent persons to serve as Flaggers. These Flaggers shall be trained and certified by MTA Rail Operations prior to any work commencing. All costs incurred by MTA shall be paid by the party.

B. A construction project that will require work over, under or adjacent to the at grade and aerial MTA right-of-way should be aware that the operation of machinery, construction of scaffolding or any operation hazardous to the operation of the MTA facility shall require that the work be done during non-revenue hours and authorized through the MTA Track Allocation process.

C. MTA flagmen or inspectors from MTA Operations shall observe all augering, pile driving or other work that is judged to be hazardous. Costs associated with the flagman or inspector shall be borne by the Party.

D. The party shall request access rights or track rights to perform work during non-revenue hours. The request shall be made through the MTA Track Allocation process.-

4.4 OTHER METRO FACILITIES

A. Access and egress from the public streets to fan shafts, vent shafts and emergency exits must be maintained at all times. The shafts shall be protected from dust and debris. See

Exhibit A for details.

B. Any excavation in the vicinity of MTA power lines feeding the Metro System shall be through hand excavation and only after authorization has been obtained through the MTA Track Allocation process. MTA Rail Operations Control Center shall be informed before any operations commences near the MTA power system.

C. Flammable liquids shall not to be stored over or within 25 feet horizontally of MTA underground facilities. If installed within 25 to 100 feet horizontally of the structure, protective encasement of the tanks shall be required in accordance with NFPA STD 130. Existing underground tanks located within 100 feet horizontally of MTA facilities and scheduled to be abandoned are to be disposed of in accordance with Appendix C of NFPA STD 130. NFPA STD 130 shall also be applied to the construction of new fuel tanks.

D. Isolation of MTA Facilities from Blast

Subsurface areas of new adjacent private buildings where the public has access or that cannot be guaranteed as a secure area, such as parking garages and commercial storage and warehousing, will be treated as areas of potential explosion. NFPA 130, Standard for Fixed Guideway Transit Systems, life safety separation criteria will be applied that assumes such spaces contain Class I flammable, or Class II or Class III Combustible liquids. For structural and other considerations, isolation for blast will be treated the same as seismic separation, and the more restrictive shall be applied.

E. Any proposed facility that is located within 20 feet radius of an existing Metro facility will require a blast and explosion study and recommendations to be conducted by a specialist who is specialized in the area of blast force attenuation. This study must assess the effect that an explosion in the proposed non-Metro facility will have on the adjacent Metro facility and provide recommendations to prevent any catastrophic damage to the existing Metro facility. Metro must approve the qualifications of the proposed specialist prior to commencement of any work on this specialized study.

4.5 SAFETY REGULATIONS

A. Comply with Cal/OSHA Compressed Air Safety Orders Title 8, Division 1, Chapter 4, Subchapter 3. Comply with California Code of Regulations Title 8, Title 29 Code of Federal Regulations; and/or the Construction Safety and Health Manual (Part F) of the contract whichever is most stringent in regulating the safety conditions to be maintained in the work environment as determined by the Authority. The Party recognizes that government promulgated safety regulations are minimum standards and that additional safeguards may be required

B. Comply with the requirements of Chemical Hazards Safety and Health Plan, (per 29 CFR 1910.120 entitled, (Hazardous Waste Operations and Emergency Response) with respect to the handling of hazardous or contaminated wastes and mandated specialty raining and health screening.

C. Party and contractor personnel while within the operating MTA right-of-way shall

coordinate all safety rules and procedures with MTA Rail Operations Control Center.-

D. When support functions and electrical power outages are required, the approval MUST be obtained through the MTA Track Allocation procedure. Approval of the support functions and power outages must be obtained in writing prior to shutdown.

5.0 CORROSION

5.1 STRAY CURRENT PROTECTION

A. Because stray currents may be present in the area of the project, the Party shall investigate the site for stray currents and provide the means for mitigation when warranted.

B. Installers of facilities that will require a Cathodic Protection (CP) system must coordinate their CP proposals with MTA. Inquiries shall be routed to the Manager, Third Party Administration.

C. The Party is responsible for damage caused by its contractors to MTA corrosion test facilities in public right-of-way.

End of Section

Tal Harari <tal.harari@lacity.org>

Fwd: Metro comment letter_Central City and Central City North CPU NOP

Bryan Eck <bryan.eck@lacity.org> Fri, Mar 3, 2017 at 3:18 PM
To: Tal Harari <tal.harari@lacity.org>

——— Forwarded message ———
From: **Carvajal, Elizabeth** <CarvajalE@metro.net>
Date: Fri, Mar 3, 2017 at 3:06 PM
Subject: Metro comment letter_Central City and Central City North CPU NOP
To: Bryan Eck <bryan.eck@lacity.org>
Cc: "Williams, Marquis" <WilliamsMar@metro.net>

Bryan,
Thank you for the opportunity to comment on the Central City and Central City North Community Plan Updates Notice of Preparation. The Metro comment letter is attached. Please do not hesitate to reach out if you have any questions.

Thank you,

Elizabeth Carvajal
LA Metro
Sr. Manager, Transportation Planning
Countywide Planning & Development, Strategic Initiatives
213.922.3084 W
metro.net | facebook.com/losangelesmetro | @metrolosangeles
Metro provides excellence in service and support.

–

BRYAN ECK
CITY PLANNER
DEPARTMENT OF CITY PLANNING
Community Planning Bureau | Downtown Community Planning
P 213.978.1304
E bryan.eck@lacity.org
200 N. Spring St., Room 667
Los Angeles, CA 90012
www.dtla2040.org

3 attachments

Metro Comment Letter Central City Central City North_NOP 3.3.17.pdf
449K

Noise Easement Deed.pdf
3370K

Adj Constr Design Manual - Metro Design Criteria.pdf
55K

STATE OF CALIFORNIA
NATIVE AMERICAN HERITAGE COMMISSION
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone (916) 373-3710
Fax (916) 373-5471
Email: nahc@nahc.ca.gov
Website: http://www.nahc.ca.gov
Twitter: @CA_NAHC

February 24, 2017

Bryan Eck
City of Los Angeles
200 N. Spring Street, Room 525
Los Angeles, CA 90012

Sent via Email to: bryan.eck@@lacity.org

Re: SCH# 2017021024 Central City and central City North Community Plan Update and Environmental Impact Report, Los Angeles County.

Dear Mr. Eck:

The Native American Heritage Commission (NAHC) has reviewed the Notice of Preparation (NOP) prepared for the project referenced above.

The California Environmental Quality Act (CEQA)[1], specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.[2] If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared.[3] In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended in 2014 by Assembly Bill 52. (AB 52).[4] **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** AB 52 created a separate category for "tribal cultural resources"[5], that now includes "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment.[6] Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.[7] Your project may also be subject to **Senate Bill 18 (SB 18)** (Burton, Chapter 905, Statutes of 2004), Government Code 65352.3, if it also involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space. **Both SB 18 and AB 52 have tribal consultation requirements**. Additionally, if your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966[8] may also apply.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

Agencies should be aware that AB 52 does not preclude agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52. For that reason, we urge you to continue to request Native American Tribal Consultation Lists and Sacred Lands File searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/. Additional information regarding AB 52 can be found online at http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf, entitled "Tribal Consultation Under AB 52: Requirements and Best Practices".

The NAHC recommends lead agencies consult with all California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources.

A brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments is also attached.

Please contact me at katy.sanchez@nahc.ca.gov or call (916) 373-3712, if you have any questions.

Sincerely,

Katy Sanchez

Katy Sanchez
Associate Environmental Planner

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[1] Pub. Resources Code § 21000 et seq.
[2] Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b); CEQA Guidelines Section 15064.5 (b)
[3] Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1); CEQA Guidelines § 15064 (a)(1)
[4] Government Code 65352.3
[5] Pub. Resources Code § 21074
[6] Pub. Resources Code § 21084.2
[7] Pub. Resources Code § 21084.3 (a)
[8] 154 U.S.C. 300101, 36 C.F.R. § 800 et seq.

Pertinent Statutory Information:

Under AB 52:
AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:
Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice.
A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.[9] and **prior to the release of a negative declaration, mitigated negative declaration or environmental impact report**. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18).[10]
The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

a. Alternatives to the project.
b. Recommended mitigation measures.
c. Significant effects.[11]

1. The following topics are discretionary topics of consultation:
   a. Type of environmental review necessary.
   b. Significance of the tribal cultural resources.
   c. Significance of the project's impacts on tribal cultural resources.

If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency.[12]
With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process **shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10.** Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.[13]
If a project may have a significant impact on a tribal cultural resource, **the lead agency's environmental document shall discuss** both of the following:

a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource.[14]

Consultation with a tribe shall be considered concluded when either of the following occurs:

a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.[15]

Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 **shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program**, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable.[16]
If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, **the lead agency shall consider feasible mitigation** pursuant to Public Resources Code section 21084.3 (b).[17]
An environmental impact report **may not be certified**, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days.[18]

This process should be documented in the Tribal Cultural Resources section of your environmental document.

Under SB 18:
Government Code § 65352.3 (a) (1) requires consultation with Native Americans on general plan proposals for the purposes of "preserving or mitigating impacts to places, features, and objects described § 5097.9 and § 5091.993 of the Public Resources Code that are located within the city or county's jurisdiction. Government Code § 65560 (a), (b), and (c) provides for consultation with Native American tribes on the open-space element of a county or city general plan for the purposes of protecting places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code.

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[9] Pub. Resources Code § 21080.3.1, subds. (d) and (e)
[10] Pub. Resources Code § 21080.3.1 (b)
[11] Pub. Resources Code § 21080.3.2 (a)
[12] Pub. Resources Code § 21080.3.2 (a)
[13] Pub. Resources Code § 21082.3 (c)(1)
[14] Pub. Resources Code § 21082.3 (b)
[15] Pub. Resources Code § 21080.3.2 (b)
[16] Pub. Resources Code § 21082.3 (a)
[17] Pub. Resources Code § 21082.3 (e)
[18] Pub. Resources Code § 21082.3 (d)

- SB 18 applies to **local governments** and requires them to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf
- Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.**[19]
- There is no Statutory Time Limit on Tribal Consultation under the law.
- Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research,[20] the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction.[21]
- Conclusion Tribal Consultation: Consultation should be concluded at the point in which:
    - The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
    - Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation.[22]

NAHC Recommendations for Cultural Resources Assessments:

- Contact the NAHC for:
    - A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
    - A Native American Tribal Contact List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
        - The request form can be found at http://nahc.ca.gov/resources/forms/.
- Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
    - If part or the entire APE has been previously surveyed for cultural resources.
    - If any known cultural resources have been already been recorded on or adjacent to the APE.
    - If the probability is low, moderate, or high that cultural resources are located in the APE.
    - If a survey is required to determine whether previously unrecorded cultural resources are present.
- If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
    - The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

Examples of Mitigation Measures That May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

- Avoidance and preservation of the resources in place, including, but not limited to:
    - Planning and construction to avoid the resources and protect the cultural and natural context.
    - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - Protecting the cultural character and integrity of the resource.
    - Protecting the traditional use of the resource.
    - Protecting the confidentiality of the resource.
- Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed.[23]
- Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated.[24]

The lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

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[19] (Gov. Code § 65352.3 (a)(2)).
[20] pursuant to Gov. Code section 65040.2,
[21] (Gov. Code § 65352.3 (b)).
[22] (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).
[23] (Civ. Code § 815.3 (c)).
[24] (Pub. Resources Code § 5097.991).

- Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources.[25] In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
- Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
- Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

[25] per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)).

Tal Harari <tal.harari@lacity.org>

Fwd: Scoping Meeting EIR for ReCoding LA

1 message

Bryan Eck <bryan.eck@lacity.org> Mon, Feb 13, 2017 at 1:56 PM
To: Tal Harari <tal.harari@lacity.org>

Please include in the case file. Thanks.

---------- Forwarded message ----------
From: **Ricarda Bennett** <rbennett@bennettgroup.biz>
Date: Mon, Feb 13, 2017 at 1:53 PM
Subject: Scoping Meeting EIR for ReCoding LA
To: bryan.eck@lacity.org

Hi, Bryan

Will this meeting be recorded? I probably won't be able to make it to Downtown LA.

Thank you in advance for responding. I just want to make sure there are provisions in the new code that allow for heliports in downtown LA.

Best, Ricarda

Ricarda Bennett
Heliport Consultants
T: 805-494-4858 F: 805-494-5151
E: rbennett@bennettgroup.biz
W: www.bennettgroup.biz

--

BRYAN ECK
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Tal Harari <tal.harari@lacity.org>

Fwd: SCAG Comments on the NOP of a DEIR for the Central City and Central City North Community Plan Update [SCAG NO. IGR9164]

Bryan Eck <bryan.eck@lacity.org> Mon, Mar 6, 2017 at 8:44 AM
To: Tal Harari <tal.harari@lacity.org>

——— Forwarded message ———
From: **Anita Au** <au@scag.ca.gov>
Date: Mon, Mar 6, 2017 at 8:10 AM
Subject: SCAG Comments on the NOP of a DEIR for the Central City and Central City North Community Plan Update [SCAG NO. IGR9164]
To: "bryan.eck@lacity.org" <bryan.eck@lacity.org>
Cc: Ping Chang <CHANG@scag.ca.gov>

Good morning Bryan,

Please find attached SCAG Comments on the NOP of a DEIR for the Central City and Central City North Community Plan Update [SCAG NO. IGR9164].

Please contact me at (213) 236-1874 or au@scag.ca.gov if you have any questions or difficulties with the attached file.

Thank you,

Anita Au

Assistant Regional Planner

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

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Stay Connected

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IGR9164 NOP Central City and Central City North Community Plan Update.pdf
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Transportation
Barbara Messina, Alhambra

March 6, 2017

Mr. Bryan Eck, City Planner
City of Los Angeles, Department of City Planning
200 North Spring Street, Room 667
Los Angeles, California 90012
Phone: (213) 978-1304
E-mail: bryan.eck@lacity.org

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Central City and Central City North Community Plan Update [SCAG NO. IGR9164]

Dear Mr. Eck,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Central City and Central City North Community Plan Update ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS) pursuant to Senate Bill (SB) 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.[1] Guidance provided by these reviews is intended to assist local agencies such as local jurisdictions and project proponents to take actions that help contribute to the attainment of the regional goals and policies in the RTP/SCS.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Central City and Central City North Community Plan Update. The proposed project includes an update to the Downtown Community Plans, adoption of the Downtown Zoning Code, and the adoption of necessary revisions, amendments, specific plans, and other ordinances that will guide development through year 2040 in the 4,166 acre Downtown Plans area.

When available, please send environmental documentation to *SCAG's office in Los Angeles or by email to au@scag.ca.gov* providing, at a minimum, the full public comment period for review. If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Anita Au, Assistant Regional Planner, at (213) 236-1874 or au@scag.ca.gov. Thank you.

Sincerely,

Ping Chang

Ping Chang
Acting Manager, Compliance and Performance Monitoring

[1] Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2016 RTP/SCS for the purpose of determining consistency for CEQA. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a determination of consistency with the 2016 RTP/SCS for CEQA.

COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE CENTRAL CITY AND CENTRAL CITY NORTH COMMUNITY PLAN UPDATE [SCAG NO. IGR9164]

CONSISTENCY WITH RTP/SCS

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS. For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the RTP/SCS.

2016 RTP/SCS GOALS

The SCAG Regional Council adopted the 2016 RTP/SCS in April 2016. The 2016 RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health (see http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx). The goals included in the 2016 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2016 RTP/SCS are the following:

SCAG 2016 RTP/SCS GOALS	
RTP/SCS G1:	*Align the plan investments and policies with improving regional economic development and competitiveness*
RTP/SCS G2:	*Maximize mobility and accessibility for all people and goods in the region*
RTP/SCS G3:	*Ensure travel safety and reliability for all people and goods in the region*
RTP/SCS G4:	*Preserve and ensure a sustainable regional transportation system*
RTP/SCS G5:	*Maximize the productivity of our transportation system*
RTP/SCS G6:	*Protect the environment and health for our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking)*
RTP/SCS G7:	*Actively encourage and create incentives for energy efficiency, where possible*
RTP/SCS G8:	*Encourage land use and growth patterns that facilitate transit and active transportation*
RTP/SCS G9:	*Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies**
	*SCAG does not yet have an agreed-upon security performance measure.

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

SCAG 2016 RTP/SCS GOALS		
	Goal	Analysis
RTP/SCS G1:	*Align the plan investments and policies with improving regional economic development and competitiveness*	*Consistent: Statement as to why;* *Not-Consistent: Statement as to why;* *Or* *Not Applicable: Statement as to why;* *DEIR page number reference*
RTP/SCS G2:	*Maximize mobility and accessibility for all people and goods in the region*	*Consistent: Statement as to why;* *Not-Consistent: Statement as to why;* *Or* *Not Applicable: Statement as to why;* *DEIR page number reference*
etc.		etc.

2016 RTP/SCS STRATEGIES

To achieve the goals of the 2016 RTP/SCS, a wide range of land use and transportation strategies are included in the 2016 RTP/SCS. Technical appendances of the 2016 RTP/SCS provide additional supporting information in detail. To view the 2016 RTP/SCS, please visit: http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx. The 2016 RTP/SCS builds upon the progress from the 2012 RTP/SCS and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that the SCAG region strives toward a more sustainable region, while the region meets and exceeds in meeting all of applicable statutory requirements pertinent to the 2016 RTP/SCS. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

DEMOGRAPHICS AND GROWTH FORECASTS

Local input plays an important role in developing a reasonable growth forecast for the 2016 RTP/SCS. SCAG used a bottom-up local review and input process and engaged local jurisdictions in establishing the base geographic and socioeconomic projections including population, household and employment. At the time of this letter, the most recently adopted SCAG jurisdictional-level growth forecasts that were developed in accordance with the bottom-up local review and input process consist of the 2020, 2035, and 2040 population, households and employment forecasts. To view them, please visit http://www.scag.ca.gov/Documents/2016GrowthForecastByJurisdiction.pdf. The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts			Adopted City of Los Angeles Forecasts		
	Year 2020	Year 2035	Year 2040	Year 2020	Year 2035	Year 2040
Population	19,663,000	22,091,000	22,138,800	4,017,000	4,442,500	4,609,400
Households	6,458,000	7,325,000	7,412,300	1,441,400	1,618,900	1,690,300
Employment	8,414,000	9,441,000	9,871,500	1,899,500	2,104,100	2,169,100

MITIGATION MEASURES

SCAG staff recommends that you review the Final Program Environmental Impact Report (Final PEIR) for the 2016 RTP/SCS for guidance, as appropriate. SCAG's Regional Council certified the Final PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on April 7, 2016 (please see: http://scagrtpscs.net/Pages/FINAL2016PEIR.aspx). The Final PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.

Tal Harari <tal.harari@lacity.org>

Fwd: SCAQMD Staff NOP Comments for the Central City and Central City North Community Plan Update Project

Bryan Eck <bryan.eck@lacity.org> Fri, Mar 3, 2017 at 1:51 PM
To: Tal Harari <tal.harari@lacity.org>

——— Forwarded message ———
From: **Lijin Sun** <LSun@aqmd.gov>
Date: Fri, Mar 3, 2017 at 12:32 PM
Subject: SCAQMD Staff NOP Comments for the Central City and Central City North Community Plan Update Project
To: "bryan.eck@lacity.org" <bryan.eck@lacity.org>

Dear Mr. Eck,

Attached are the SCAQMD staff comments on the Notice of Preparation of a Draft Environmental Impact Report for the Central City and Central City North Community Plan Update Project (Case Numbers: CPC-2017-432-CPU; ENV-2017-433-EIR) (SCAQMD Control Number: LAC170208-01). The original, electronically signed letter will be forwarded to your attention by regular USPS mail. Please contact me if you have any questions regarding these comments.

Sincerely,

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

21865 Copley Drive, Diamond Bar, CA 91765

Ph: (909) 396-3308. Fx: (909) 396-3324

Email: LSun@aqmd.gov

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LAC170208-01 - NOP Central City and Central City North Community Plans.pdf
282K

South Coast
Air Quality Management District
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SENT VIA USPS AND E-MAIL:
bryan.eck@lacity.org
City of Los Angeles, Department of City Planning
ATTN: Bryan Eck, City Planner
200 N. Spring Street, City Hall, Room 525
Los Angeles, CA 90012

March 3, 2017

Notice of Preparation of a Draft Environmental Impact Report for the Central City and Central City North Community Plan Update Project (Case Numbers: CPC-2017-432-CPU; ENV-2017-433-EIR)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the Draft Environmental Impact Report (EIR). Please send the SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. **In addition, please send with the Draft EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air**

The SCAQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and the SCAQMD to reduce community exposure to source-specific and cumulative air pollution impacts, the SCAQMD adopted the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning in 2005. This Guidance Document provides suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. The SCAQMD staff recommends that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions. This Guidance Document is available on SCAQMD's website at: http://www.aqmd.gov/home/library/documents-support-material/planning-guidance/guidance-document. Additional guidance on siting incompatible land uses (such as placing homes near freeways or other polluting sources) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Perspective*, which can be found at: http://www.arb.ca.gov/ch/handbook.pdf.

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the Lead Agency compare the emission results to the recommended regional significance thresholds found here: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf. In addition to analyzing regional air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-

Mitigation Measures

In the event that the proposed project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the proposed project, including:

- Chapter 11 of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD's CEQA web pages available here: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies.
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- SCAG's MMRP for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy available here: http://scagrtpscs.net/Documents/2016/peir/final/2016fPEIR_ExhibitB_MMRP.pdf.
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's webpage (http://www.aqmd.gov).

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL: March 3, 2017

bryan.eck@lacity.org
City of Los Angeles, Department of City Planning
ATTN: Bryan Eck, City Planner
200 N. Spring Street, City Hall, Room 525
Los Angeles, CA 90012

Notice of Preparation of a Draft Environmental Impact Report for the Central City and Central City North Community Plan Update Project (Case Numbers: CPC-2017-432-CPU; ENV-2017-433-EIR)

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Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD staff recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analyses. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). The SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

Adopted on March 3, 2017, the 2016 Air Quality Management Plan (2016 AQMP) is a regional blueprint for achieving air quality standards and healthful air in the South Coast Air Basin. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality including the challenge of achieving 45% additional NOx reductions in 2023 and 55% in 2031 that are needed for ozone attainment. The 2016 AQMP is available on SCAQMD's website at: http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan.

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When specific development is reasonably foreseeable as result of the goals, policies, and guidelines in the proposed project, the Lead Agency should identify any potential adverse air quality impacts and sources pf air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in the Draft EIR. The degree of specificity will correspond to the degree of specificity involved in the underlying activity which is described in the Draft EIR (CEQA Guidelines Section 15146). When quantifying air quality emissions, emissions from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, for phased projects where there will be an overlap between construction and operation, the air quality impacts from the overlap should be combined and compared to the SCAQMD's regional operational thresholds to determine significance.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

Mitigation Measures

In the event that the proposed project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the proposed project, including:

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Data Sources

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The SCAQMD staff is available to work with the Lead Agency to ensure that project air quality and health risk impacts are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov or call me at (909) 396-3308.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS
LAC170208-01
Control Number



Tal Harari <tal.harari@lacity.org>

Fwd: DTLA 2040 EIR scoping period comments

Bryan Eck <bryan.eck@lacity.org> Mon, Mar 6, 2017 at 9:40 AM
To: Tal Harari <tal.harari@lacity.org>

---------- Forwarded message ----------
From: **Shane Phillips** <shanedphillips@gmail.com>
Date: Sat, Mar 4, 2017 at 1:47 PM
Subject: DTLA 2040 EIR scoping period comments
To: Bryan Eck <bryan.eck@lacity.org>

Hi Bryan,

Below are my comments for the scoping period of the DTLA 2040 EIR, including both environmentally-focused comments as well as more general requests:

1. When studying carbon emissions impacts, do not study downtown LA (or even LA as a whole) as a closed system. Carbon emissions anywhere contribute to global concentrations everywhere, so we need to compare growth in downtown to a baseline in which housing will be built *somewhere* no matter what. In other words, if we don't build housing in DTLA, the people who would live in that unit don't disappear from the planet, and wherever they *do* end up moving will probably result in higher per-capita emissions than if they live in DTLA. To understand the true consequences of any limitations on housing development in downtown, we must evaluate impacts on a global scale. This should be a relatively simple process where average carbon emissions per household (adjusted for household size) are contrasted between new high-density multifamily units in LA and new housing being built elsewhere as overflow from high-cost low-supply markets, in places like San Bernardino and Riverside Counties, Nevada, Arizona, Texas, etc.

2. Study comparative environmental and traffic impacts assuming that the future zoning will include dramatic cuts in parking requirements—ideally removing them entirely. Then actually make those cuts, of course. This will not only reduce environmental impact, but will lower costs in a way that promotes more people moving to Los Angeles.

3. Also study vehicle-miles traveled (VMT) benefits and associated environmental protection in a few ways. More people living near transit and jobs should increase transit ridership, walking, and bicycling; more jobs and other destinations closer to more homes should mean less car dependence; fewer homes built in suburbs and adjacent counties should reduce per-capita VMT from commuting into the area (at least from so great a distance).

4. Include a "high population/household growth" scenario for if housing and population growth exceeds expectations, which is entirely possible (and something we should actually promote in downtown).

5. Evaluate the environmental impacts of preserving the land in the southeast of downtown purely for jobs/manufacturing versus a housing/jobs hybrid zone. This will most likely show that maintaining a status quo with low job density and extremely limited housing will have negative environmental impacts on the region and global carbon emissions, relative to a scenario in which housing as well as higher-job-density commercial uses are allowed in southeast downtown. This is not a request to open up southeast downtown to housing exclusively, which could result in jobs completely disappearing from the area because of the relative value of residential versus commercial uses. Developers may be required to provide 1 or 2 FAR of commercial uses as a prerequisite for including any housing, if we decide that promoting job-producing uses in certain areas is a priority. Regardless, we should evaluate an option in which housing is allowed and promoted in southeast DTLA, at least north of the 10 freeway, in some meaningful capacity.

6. No zone in the proposed updates should have a maximum FAR of less than 6.0. If lower maximum FARs are maintained, their impact on global carbon emissions and total (nationwide) VMT should be assessed.

7. The statement that "Markets" areas should only have "limited multi-family residential and live/work" is problematic, because this is a very large area that will never hope to have multiple floors of commercial uses in every building. It should be opened up to allow more residential use and only require ~1 FAR of commercial use.

8. The area around the Little Tokyo Metro station should be all Transit Core, or at least Transit Edge. I recognize that the "Villages" area is currently a market area, but this is a use that should be allowed to evolve and could certainly be maintained while allowing for significant additional above-ground-floor uses. One way to preserve character while allowing greater density is simply to increase the FAR of the Villages areas but include special design requirements that facilitate market-like ground-level uses.

9. The Hybrid Industrial should nix its requirements for exclusively live/work units, as the majority of these are almost certainly not used for any "work"—they're just homes that are designed somewhat differently than typical multifamily units, and are therefore more expensive. If we feel that there is value in producing additional live/work units, we should set a target and require that all multifamily units be built as live/work units until that goal is reached, and then allow any future units to be built as normal apartments or condos. Several thousand live/work units should be more than adequate to serve the community of makers that might hope to use them, and since they rent at a premium, those that actually want to use them for work should have no trouble securing them. Building every single unit as a live/work is environmentally wasteful as well as more expensive for the end-user.

10. We should look at preserving the areas that are currently zoned for Public Facilities and converting them to Open Space zones rather than commercial, residential, or industrial uses. Rezoning and then trying to acquire land for parks in the future will be much more expensive and therefore likely to result in less open space for downtown residents, workers, and visitors.

Thank you,

Shane Phillips

--

BRYAN ECK
CITY PLANNER
DEPARTMENT OF CITY PLANNING
Community Planning Bureau | Downtown Community Planning
P 213.978.1304
E bryan.eck@lacity.org
200 N. Spring St., Room 667
Los Angeles, CA 90012
www.dtla2040.org

Tal Harari <tal.harari@lacity.org>

Fwd: Case Numbers: CPC-2017-432-CPU; ENV-2017-433-EIR Scoping Comments

Bryan Eck <bryan.eck@lacity.org> Mon, Mar 6, 2017 at 11:28 AM
To: Tal Harari <tal.harari@lacity.org>

---------- Forwarded message ----------
From: **Tom Williams** <ctwilliams2012@yahoo.com>
Date: Mon, Mar 6, 2017 at 11:25 AM
Subject: Case Numbers: CPC-2017-432-CPU; ENV-2017-433-EIR Scoping Comments
To: "bryan.eck@lacity.org" <bryan.eck@lacity.org>, Julio Torres <julio.torres@lacity.org>, Miguel Vargas <mvargas41035@gmail.com>

DATE: March 6, 2017
TO: City of Los Angeles, Department of City Planning
200 N. Spring Street, Room 667 Los Angeles, CA 90012
ATTN: Bryan Eck, City Planner
Phone: (213) 978-1304 E-mail: bryan.eck@lacity.org
CC: CD1
CD14
FROM: Dr. Tom Williams, Snr. Techn. Advis., Citizens Coalition for a Safe Community
North Area Director, LA-32 Neighborhood Council
Co-Chair, Central Group, Angeles Chapter, Sierra Club

SUBJECT: Case Numbers: CPC-2017-432-CPU; ENV-2017-433-EIR
Central City (=Downtown) and Central City North Community Plan Areas

RE: Comments on Scoping for DEIR

--

BRYAN ECK
CITY PLANNER
DEPARTMENT OF CITY PLANNING
Community Planning Bureau | Downtown Community Planning
P 213.978.1304
E bryan.eck@lacity.org
200 N. Spring St., Room 667
Los Angeles, CA 90012
www.dtla2040.org

DTLAComments030617fin.doc
149K

DATE: March 6, 2017

TO: City of Los Angeles, Department of City Planning
200 N. Spring Street, Room 667 Los Angeles, CA 90012
ATTN: Bryan Eck, City Planner
Phone: (213) 978-1304 E-mail: bryan.eck@lacity.org

CC: CD1
CD14

FROM: Dr. Tom Williams, Snr. Techn. Advis., Citizens Coalition for a Safe Community
North Area Director, LA-32 Neighborhood Council
Co-Chair, Central Group, Angeles Chapter, Sierra Club

SUBJECT: Case Numbers: CPC-2017-432-CPU; ENV-2017-433-EIR
Central City (=Downtown) and Central City North Community Plan Areas

RE: Comments on Scoping for DEIR

Commenter

I am retired scientist/engineer/project manager employed by URS Corp.(=AECOM), Parsons Pasadena, and Dubai UAE Ports and Free Zones for more than 40 year professional experiences, with many other consultancies worldwide. My degrees include BS-MS-PhD in geology and zoology. Work background began in 1972 with preparation of the newly required Environmental Impact Report and Statement under the initial CEQA and NEPA requirements and provided the primary focus for 40 years preparing/reviewing/managing more than 400 EIRs/EISs/EAs/MNDs. I have been an owner-occupant/resident of NELA and Pasadena and member of LA-32 and Historic Highland Park Neighborhood Councils.

As an employee of Parsons, I was Environmental Controls Supervisor PDCD, Construction Management for Downtown LA, RTD/MTA Red Line Phase 1 during 1984-90. I was also environmental resources specialist for the Master Plan for Dubai UAE and later directly as technical adviser for Dubai World development of Coastal/Islands Free Zone and Development in Dubai (e.g., Palms 1-3, Port Rashid, Port of Jebel Ali, World Islands, etc.).

Similarly with Parsons, I was environment resources specialist.planner, and engineer for infrastructure plans for Cairo Egypt, Aleppo/Lattakia Syria, Medan Indonesia, Kota Kinabalu/Kauntan/Sandakan Malaysia, Majuro Marshall Island, etc.).

Thank you for the opportunity to submit comments for scoping of the Draft Environmental Impact Report (DEIR) of the Central City/Downtown Community Plan(s) Project(s).

Scoping Comments: In accordance with CEQA Section 15082, the Notice of Preparation for the Downtown Los Angeles..., and these written comments are provided today before 5:00 pm March 6, 2017.

GENERAL SCOPING COMMENTS

Major Issues

1. Project Description
   Clearly state the proper title of the Project, e.g., Downtown or Central City.
   Separate proposed revised Zoning from Land Uses conditions, setting, and assessments.
   Clearly separate all approved Specific Plan areas from the Project (e.g., Cornfield Arroyo Specific Plans) OR clearly indicated that the Specific Plans shall be revised consistent with provisions of the Zoning and Plans, including changing of existing ordinances.

2. Project Policies, Goals, Objectives, Purposes and Needs
   Provide improved Project Objectives which is/can be quantified and scheduled in order to clearly develop and compare alternatives and achievement of objectives by the proposed Project.

Provide Objectives separately for Zoning issues as new zoning conditions are distinctly different from the proposed land use categories of the Community Plans.

3. Projections – CalifDeptOfFinance. > SoCalAssocGovt. > LA County > LA City > Dept. of City Planning
   Provide a comprehensive process for the allocations of population/household/jobs from the SCAG down to areas of current and proposed Specific, Community, and General Plans and specific responsibilities for those applied to these Plans (and specifics for each of the two Plan areas and the Specific Plans.
   As projections include allocation of "Jobs" and thereby employment, such projections clearly have economic/financial implications beyond simple numbers (e.g., salaries/wages, income classes, and affordability) and changes from current/past census levels. Provide appropriate population, employment, household incomes, and affordability factors in Sector Setting-Assessment-Mitigation.
4. Financials/Economics/Economic Development - The DEIR must clearly provide the financial and economic setting for the existing and projected populations, households, and employment. Assessments also reference "feasible" (e.g., NOP p.3/3: "as available and feasible") for various project conditions, alternatives, and mitigation measures. Provide appropriate financial and economic aspects for any use of "Feasible" or "Feasibility" within any Sector Setting-Assessment-Mitigation or other CEQA sections.
5. General Plan Programmatic EIR for Zoning - Provide a Programmatic EIR for Zoning and separate Project Specific EIR for Community Plan areas and existing Specific Plan(s) within the Project specific area.
6. DEIR-Objectivity/Numerical-Quantitative – Based on the large and complex nature of the "Project", the entire project must be provided in a digital GIS/OnLine Model similar to LA City-ZIMAS planning equivalent, which could become a "demo"/pioneer example for all other Community Plans and the updated Zoning requirements.

Alternatives

7. Higher Metro Center #1 -- All Zoning – add 5 floors for all proposed parcels west of Alameda and south of US-101 and 3 floors for all parcels east of Alameda and north of US-101.
8. Metro Neighborhoods #2 -- All Zoning within ≥15 acres (800-1320ft x same) for new Specific Plan Areas (50-100 areas) with height of highest existing "spot" building in specific areas (equal to 01012017 before the Ordinance).

Mitigation Measures

9. Provide/include Draft Mitigation Monitoring and Reporting Plan in DEIR.
   Provide clear feasibility analyses for all mitigation measures.

Commenting/Participation System

10. As First Major Update, Provide an Open publicly accessible integrated WWW Page for Rezoning/New Landuse Revision (Equivalent to Zimas = "PLUMAS" for Community/District Plans and General Plan).
    Provide with links to General Plan and ReZoning for weekly updated status maps and texts.
    Provide zoning, historic/current-status links to related Re-Zone, Community and Specific Plan Pages.
    Provide Community Advisory Panel for each Plan area throughout CEQA process.

Maximum Density

11. Provide estimates of maximum population, households, jobs, and other factors based on proposed Plans and zonings and prospective variations based on 2007-2017 variation achievement (e.g., median and 85%ile increases in floor areas, FARs, building heights, etc.).

Sector Issues

DTLA2040 WWW pages provide a "Pseudo-Initial Study" without direct incorporation with the NOP although referenced and linked. Withdraw/revise/recirculation NOP with appropriate Initial Study(ies), thorough studies, checklists, significance, and mitigation for Re-Zoning and for Community Plan(s).

Aesthetics/Recreation Services – Provide viewsheds for LA River and Elysian Hills as to their views of existing and future of DTLA and as to views of these resources from DTLA towers of >10 floors.
Provide viewshed to/from LA River and proposed building envelope east of Alameda.

Cultural Resources – Provide paleontological resources setting for bedrock and those for older alluvial area within 50ft depth of surface.

Provide Archaeological, and Historical Resources as may be indicated must be reviewed, including compared to available 1923 and 1928 and subsequent thereafter aerial-photos.

Provide locations and conditions of the oldest 100 extant structures and parcels.

Geology-Seismicity-Mineral Resources

Provide maps and sections for Alluvium and Bedrock at surface and within 100ft of surface.

Provide maps and section for Groundwater Recharging/Forced Infiltration, Storage, and Outflow from the Plans' areas and their relationships to the LA River

Seismicity and Structural Assignments - Provide inventory and locations of all recorded seismic events including SCEC and USGS files and relate to the closest structural features, including blind/buried faults.

Ground Gas/Methane Zones - Provide surface zonal demarcations and their associated historic oil fields in DTLA (e.g., Union Station, LA Downtown, etc.) and their known leases. Provide current subsurface properties demarcations and owners related to the surface zones.

Hazardous Materials – 1923-1972 aerial photos show railroad and other industrial land uses related to potential sources of hazardous materials and wastes due to local disposal, uses, and spillage/releases.

Provide known historic locations for Railroad - Cornfields

Coal Gasification Plant Site (Piper Center)

Lumber Yard and Preservative-Creosoting Pits

Chemical plants (using products delivered by RR and conveyed from the Gasification Plant).

Hydrology and LID and Groundwater Recharge – Provide historic/current recharge from City and LA River.

Delineate on map ancestral river floodplain and recharging zones and related land uses as shown in historic aerial photos.

Land Uses

Provide maps/envelope images for current occupied, under-construction/permitted, current zoning/specific plans, and then for proposed and alternative plans/zonings.

Provide estimated residential, commercial, and industrial floor areas maps for current occupied, under-construction/permitted, current zoning/specific plans, and then for proposed and alternative plans/zonings.

Provide listing and map of all Spot Zoning/Plan Variances/Amendments involving amendments of any approved plans since the last approved Plan(s)

Provide map of all Block-Building Splits (e.g, single block with >1 zoning categories) and Frontage Equivalence (e.g., major arterial with >1 zoning on either side of arterial).

Provide map of all parking facilities and lot and their current and Project zoning and planning.

Infrastructure - Services and Utilities

Provide maps and system networks for current, under-construction/permitted, and Project/Alternatives utilities and services and inventory as to date of installation, expected operating lifetime, service capacity, and percentage services for current, permitted, and projected floor areas, populations, etc..

Drainage-Sewerage-Water Supply; above/below ground Electrical-Gas.

Provide maps of existing available (un-occupied/used) transmission space (e.g., space under 7th street for new storm drains).

Provide maps of all abandoned pipes, cables, or other transmission systems and access-portals.

Infrastructure - Transportation

Provide maps of all historic, current. and proposed (e.g., Meaure M/RTP/LTP) surface and subsurface rail facilities and yards.

Provide system maps, including crossings/junctions/stops/stations.

Provide historic, current, and projected road-transits routes/intersections for Metro and LACity DOT if more than three (3) routes and provide locations and areas of all road-transit maintenance facilities.

Socio-Economics

California Department of Finance provided basic inputs to Southern California Association of Governments which were referenced in the DTLA2040-WWW Page and were assigned the 2040 SocioEcon factors of 125,000pop, 70,000 hhd., and 55,000 jobs.

Central City New Community Plan Program page 1. Summary of Public Input Received in Initial Community Outreach Meetings - Economic Development.

Provide a thorough and comprehensive financial, economic, and income assessment for current and proposed/alternative Community Plans, including all mentioned/stated "Initial Meeting" issues related to the SCAG process/products and to Zoning and Plans.

EIR SCOPING MEETING FOR THE UPDATES TO THE DOWNTOWN COMMUNITY PLANS & AMENDMENTS TO THE LAMC AS PART OF RE: CODE LA

TRANSCRIPTION OF ORAL COMMENTS

LOS ANGELES, CALIFORNIA

THURSDAY, FEBRUARY 16, 2017

Reported by:
MARIA L. WALLACE, CSR No. 10234

SHANBERG SHORTHAND REPORTERS
4771 LA VILLA MARINA UNIT H
MARINA DEL REY, CALIFORNIA 90292
(310) 306-6149

TRANSCRIPTION OF PUBLIC ORAL COMMENTS,

taken on behalf of Rincon Consultants, at CalTrans District & Building, commencing at 4:30 P.M. and ending at 7:00 P.M., at 100 South Main Street, Room 1.037, Los Angeles, California, Thursday, February 16, 2017, before MARIA L. WALLACE, Certified Shorthand Reporter No. 10234.

PUBLIC COMMENTS MADE BY:

JUSTIN RILY

ALBERTO ORTEGA

MARK CHATOFF

SISSY TRINH

FRANK LEE

REY FUKUDA

JOHN MALPEDE

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LOS ANGELES, CALIFORNIA; THURSDAY, FEBRUARY 16, 2017

4:30 P.M. - 7:00 P.M.

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MR. RILY: My name is Justin Rily. I'm a stakeholder and a downtown resident of Los Angeles, Downtown LA.

I want to put on the record today that, when we're looking at -- we're doing the guidelines to put this idea, um, the zones.

With respect to, when you look at downtown, there is definitely a historical zone, from Olympic Boulevard up to First Street, you know, over to Hill and then Spring that -- that boxed area has a lot of historical buildings.

Cities like Paris and Philadelphia have put into their code, um, language that protects viewsheas, sidelines around historical buildings and monuments that still allows development, but they give specific guideline to protect them.

And so there's -- there's some different setbacks, from development, that surroundings historical buildings.

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My name is Alberto Ortega. I'm here with -- regarding the, um -- the new -- how we -- how we do planning for the city.

And one of my concerns is how do we do plan around historical, um, buildings and look historical corridors?

And how do we, kind of, um, marry new growth with the historic core, um, without putting oversized buildings to cloud, shadow on them and just, kind of, scenic look?

The other thing is I would like to see how it's more friendlier, to the public, to get more involved. Seems like it's more towards developers than it is for the common folk.

And I would like to see a, um, like a bridge, where we work altogether and have input on how we build the city of LA.

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My name is Bill Cooper, and I live and work in downtown. And I would like to propose a serious zone, um, around our historic monuments, around our most

precious buildings, like they do in Paris, Europe, so you don't have, like, um, you know, a 40-foot sky scraper up against Big Ben, for example.

That's it.

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My name is Mark Chatoff, owner and, um -- of California Flower Mall, which is a flower market, in downtown Los Angeles. I have had the building with many uses, over the last 30 years.

And, um, okay. This is -- I'm also -- I'm also a board member of the fashion district. I've been on and off the board, for over 20 years, since it's inception.

The fashion district needs as much help from the city, as far as zoning, as possible. I'm very concerned about the FAR. And I appreciate there's been some changes, but I think it needs be looked at closely or closer.

And, um, we need -- I -- I would like to see a more aggressive FAR application. I also feel San Pedro Street is a major thoroughfare. It's ingress and egress into downtown Los Angeles, especially for the fashion district.

And that street needs to be looked at as a -- as a transportation corridor, because it's heavily used in and out of downtown. It's one of the major streets that gets you in and out.

There's also a piece of land, which is owned by the LA County, on the corner of 8th and San Pedro, which would be a great project for a gateway project, a beautification project, an entrance into the district.

And that also should be looked at as a -- a beautification project or a pocket park of some sort. Um, Dukes Leaker, which is on 8th Street, is also -- has been around for a long time, and it's servicing the homeless alcoholic problem.

And it's also one of the first liquor stores that's in the district. That needs to be looked at, and they're likely to be looked at. It's not a good neighbor. Hasn't been for a long time. And it's causing problems for the district and also exacerbating the current homeless issues that we currently have.

Okay. Let's see what else I can think of. I own the property -- it's been in the family, since the -- since the '50s, and we've done business in Los Angeles, under many different formats; in the textile business, now, we're in the floral business. Used to be an electronic business. Used to be a

manufacturing company called American Sample Company.

Now it's currently California Flower Mall. I've also converted the building into other uses over -- throughout the years, to find its best use.

But this is a terrific opportunity, to take it into the next level and really build something that's quite spectacular on that quadrant of the city.

I welcome and am available for any further input, and I have lots of time and experience on the ground here. And I want to be a part of this process.

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My name is Sissy Trinh and I represent the Southeast Asian Committee Alliance. And so we represent youth and families in China Town, Lincoln heights and Solano Canyon.

So we're very concerned about how the city is planning out the development of these communities. Um, the reason we're here is because we would ask that the City Planning Department look into studying the impacts of displacement on, um, the environment, as part of the EIR.

Because we believe that displacement will actually increase greenhouse gasses. The vast majority

of residents in China Town and Solano Canyon are transit dependant.

We did a study, where we found that a third of working adults, in China Town, actually walked. So these are people who live and work in China Town. And so we want to see displacement studied from a residential and a small-business perspective.

The other thing that we're concerned about is, if the city plans on up zoning the base density, a lot of state density bonus laws allows for developers to build beyond what they're currently allowed to, in exchange for affordable housing.

If the city increases the base density, then we're giving away all the incentives for building affordable housing. And, especially, we need housing affordability, at the deepest affordability levels. So incentives for extremely low-income families.

Again, these are people who walk to work, who are poor transit users. We have some of the highest rates of transit usage in the city. And so displacing them will increase, as I said, greenhouse gases, which is an environmental issue.

That's it.

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My name is Frank Lee. I just wanted to come, in the possibility of including legacy businesses in the EIR. Um, even without an historic designation, I think it's important to realize what cultural resources that some businesses are to the communities, and to be mindful of changing the zoning or the land-use designation that would affect these businesses.

And, when analyzing the esthetic impacts or the visual impacts of the new community plan, I think it's really important to, not only go by the existing design overlays, but also to take into consideration, um, some of the -- the esthetics, outside of a design, because design overlays could be outdated or lenient with some developments.

I think I'm done.

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My name is Rey, R-e-y, Fukuda, F-u-k-u-d-a.

And I'd like to comment on, um, including in the cultural resource section of the EIR, um, the impacts and affects on local small businesses, religious institutions, and cultural institutions, um, and

including in the population and housing section of the EIR, the need for studying existing affordable housing, including, um, SRO's and naturally occurring affordable housing and making sure that there's no loss overall, loss in existing affordable housing in any future development.

Um, in land use and planning or maybe the traffic section; to include being able to replace, to some extent, public parking. Um, because areas, particularly China Town and Little Tokyo, are regional centers.

They are regional economic development neighborhoods. So not everyone who comes, um, uses public transit. And I think that's it. Oh, I'm sorry. Just a little bit more.

To make sure that, if we're allowing existing or even more floor-area ratio, to make sure that it requires a community process and public benefits, such as, affordable housing, public parking, public art and anything else the community finds sufficient.

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My name is Jan Fukuhara. I'd like to make a comment, under the transportation circulation category

of the proposed EIR.

Let's see. The question is how does the proposed recoding, um, increase density, without accounting for compatible modalities of transport?

I understand the appropriateness of scale for developers building in the area, specifically, Little Tokyo, per the permitted density.

But, regarding future allowances, I would like to, um, ask that the planners do take into account the fact that Little Tokyo, under your proposed planning, is considered a village, with a 4 to 1 to 6 to 1 density.

But recent, private development has actually increased density, without increasing compatibility modes of transport, including access to public parking, bike ways, and pedestrians, especially, pedestrian crossings and safe walks.

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My name is John Malpede, M-a-l-p-e-d-e.

And I was -- I was talking to the, um -- the environmental consultant company, who is writing the plan or the report and, um, he was showing me the stuff on the map over there, including the criterion for the report, which are land use and planning.

And, um, one of -- under that, one of things they want to void is, um, physical division of the established communities. And his example was a freeway running through something.

So, um, I've worked in Skid Row, for a long time. And that is -- that is a community. Most of the people have lived there many -- four or fives time as many people live in residences, as live on the streets.

And it's a -- and most of those people have lived there for a long time. It's, actually, a dynamic neighborhood, when people get off the streets and into housing.

So, in the plan, it looks like they're going to create -- and since it's always been the only housing you could have there was for people of very low income people, designed to get people house or unhoused. And that's been true, since the '70s.

The first -- when the adaptive use ordinance came in, there were a few buildings, within the area east of Main and the west of, um, San Pedro or Central, rather, that were then -- that had people with other income levels. But, for the most part, they're people of very low, low income.

So the plan looks like it's going to create a living -- people living there with many different

incomes. And that's going to -- to, it seems like, it runs the risk of the physical division of the established community, especially since, according to the plan, height levels are not so high.

So it's not like it's going to be that much denser. But it is -- it is -- it runs the risk of disrupting that community. And I think that community is a -- is a -- is a unique community.

For example, it has a super sophisticated recovery consciousness because some of the -- in fact, there's, like, 80 recovering meetings that happen within the confines of Skid Row. Not in programs, but resident-organized meetings by people who are in recovery, in the 12-Step programs each week.

So -- so that's a very sophisticated and unique recovery culture in that neighborhood. And it would be a shame to see that, um -- and, you know, endangered and physically divided.

Then the other -- the other -- the second plan was in the environmental study. The concern is population and housing, population and growth and the displacement of people who are living there.

So, again, I think we don't want to see the displacement of this -- the people who are -- who are now living in the neighborhood. And like I said,

three-quarters of the people are permanently housed.

And they benefit, not only from the recovery culture that I mentioned, but the other mental-health services, health clinics and all that. And, actually, just the community ties that exist.

So we don't want to see the existing -- it would be, um -- that we don't want to see that jeopardized. And that seems to be one of the environmental criteria.

And then last thing I'll just say, it's a unique neighborhood that serves -- it's a resource for all of Southern California. And it should be recognized as a neighborhood and one that has a unique and positive vibe.

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My name is Joshua Crowell. I live in the historic core, and there are just four points. I am overall very supportive of the proposal. But just, kind of, four years of critique.

One. The jobs preserved. I -- I don't agree with that. I think we should allow a more organic process. It's one thing not to -- no one's advocating to kick out the manufacturing jobs, but to impose that

kind of requirement to that area.

And I don't agree with -- um, if it -- if it is, in fact, not hospitable to residential use, as I'm told, well then, there's no need for the requirement. So I don't really see the purpose of it.

Two. I heard that part -- the type of goal, the direction seems to be to be withdrawing parking minimums throughout most of the downtown. And I would very much agree with that. I just hope, actually, all of downtown would have no minimum parking requirements.

Three. I disagree with the notion of designating, kind of, an entertainment district versus other kinds of districts. I think we should streamline the process for small business owners, to get their licenses, whether it be food, liquor and whatnot.

And that should be streamlined pretty much everywhere in the downtown area. So that that kind of amenity is enjoyed by everyone in downtown and they don't have to all be concentrated in one place.

And, in fact, that would only encourage concentrating, for instance, bars in one place. That would actually be more detrimental than having them spread out.

And then -- let's see. I have one more. Oh, yes. On paseos, that would we required to for really

large buildings. I don't think -- I think they're kind of useless, unless they're also occupied by businesses and, therefore, have people walking through them and using them -- the spaces regularly.

Otherwise, they'll just be empty and wind swept and potentially dangerous. And the same with various public places -- spaces are required -- that would be required.

I think that there needs to be a type of business or economic commercial use also involved with it, in order to give it life, energy and also safety and traffic.

So those are my comments.

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My name is Eunha, E-u-n-h-a. Last name Choi, C-h-o-i.

And, um, the sense I get, from speaking with various representatives here is that they are going to emphasize these designs of creating very intentional districts.

So they were speaking about having a district area that is devoted for entertainment. And one of the purposes they're doing that is to enable businesses to

open up, get their licenses, liquor, wine, whatever they need to, more quickly.

And even though I support the not ı of simplifying the process for businesses to open up, getting their license, without having to wait two years, which I hear is the average these days, I think the idea of having them concentrated would be detrimental to how neighborhoods, especially, in urban centers, cities that want to be urbanized and densified and want to have lively places, dynamic places of all times of the day.

It would be detrimental to enable that, to create that. So having areas that are heavily residential would get quiet at night, right? And then the areas that are heavily entertainment purpose or business areas would get busy at night.

So I feel, like, the -- the notion of enabling businesses to open up, by creating these very intentional districts, would be, sort of, continuing the flaws of downtown, in the past, which is to have areas that are the flower district, the -- the clothing -- the fashion district, the jewelry district.

And it seemed that the intention was to get away from that. And in doing this, it would be, sort of, going back to that. So that -- and, again, having paseos, as public spaces, would be a great idea, as they

seem to be wanting to do, between large developments, or even, when they are trying to activate, for instance, the alleys that we have right now. They're pretty much dead space.

But having them, without incentivizing businesses to be there so that they would -- they would, um -- um, attract people to come at all times of day, again, would be, sort of, creating these dead zones, where people would not have any, sort of, um, purposes to go.

So the paseos are a great idea, to the extent that they are the right incentives for different businesses to open up.

Thank you so much.

(The proceedings were concluded at 7:00 P.M.)

I, MARIA L. WALLACE, undersigned, a Certified Shorthand Reporter, of the State of California, do hereby certify:

That the foregoing proceedings were taken before me at the time and place herein set forth; that a record of the comments were made by me, using machine shorthand, which was thereafter transcribed by me, and is a true record of the comments given.

IN WITNESS WHEREOF, I have this date subscribed my name _____.

Dated: 2-16-2017

Maria K Wallace

MARIA L. WALLACE
CSR No. 10234