

SANTA MONICA MOUNTAINS CONSERVANCY

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January 22, 2018

Ms. Erin Strelch
Department of City Planning
City of Los Angeles
200 North Spring Street, Room 750
Los Angeles, California 90012

ENV-2016-4064-EIR / SCH No. 2017111011
Elysian Park Lofts Project - Chinatown

Dear Ms. Strelch:

The Santa Monica Mountains Conservancy (Conservancy) respectfully submits comments on the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the proposed 920 mixed-use residential unit Elysian Park Lofts Project (Project) in the Chinatown Neighborhood, in the City of Los Angeles. In general, the Conservancy supports the development of housing in underserved urban communities that have close proximity to public transit, with the caveat of meaningful affordable housing included in each new development. These communities contributed to the development of the City of Los Angeles' Cornfield-Arroyo Seco Specific Plan (CASP), which extensively re-envisioned the community surrounding the Project. The Conservancy does not support the Project in its present form and would like to see a more robust Draft Environmental Impact Report (DEIR). This letter highlights items the Conservancy would like to be addressed in the DEIR.

The Conservancy was established by the California State Legislature in 1980. Since that time, it has helped to preserve over 72,000 acres of parkland in both wilderness and urban settings, and improved more than 114 public recreational facilities throughout Southern California. Additionally, it has given grants to non-profit organizations for educational and interpretation programs that have served hundreds of thousands of children and other park visitors. Through direct action, alliances, partnerships, and joint powers authorities, the Conservancy's mission is to strategically buy back, preserve, protect, restore, and enhance treasured pieces of Southern California to form an interlinking system of urban, rural and river parks, open space, trails, and wildlife habitats that are easily accessible to the general public.

Over the last year, the Conservancy participated in supporting and meeting with a diverse group of environmental, community, parks, and social justice organizations, known as the Los Angeles Regional Open Space & Affordable Housing (LAROSAH) Collaborative, to seek out methods to foster affordable housing projects coupled with new open space. A primary goal of this Collaborative has been to help local leaders and developers better shape local policy and resultant development projects, so that existing community members are better able to benefit from instead of becoming displaced by investments made in their community. This Project, with its significant size and adjacency to important regional open space seems well suited to offer the kinds of benefits that both the CASP and LAROSAH articulate to be incorporated into new development. The Conservancy wishes to identify the specific areas that the above-referenced DEIR should address in order to make it compliant under the California Environmental Quality Act (CEQA) and the CASP. Additionally, the Conservancy requests that the Project incorporate important changes so that it becomes an investment that protects the community and does not disturb the environmental and cultural integrity of the Los Angeles State Historic Park (LASHP), while offering much needed housing in Los Angeles.

The Project has generated a great deal of concern in the community for many reasons, including its profound potential impacts on LASHP. This jewel of an urban, open space park is the result of relentless efforts by a diverse coalition of Agencies, local community members, activists, and environmental justice advocates to prevent the development of the 34-acre site into industrial warehouses. The acquisition of the land and creation of an urban state park on the site are renowned as one of the most significant environmental justice victories in Los Angeles, and have been regarded as the catalyst for the revitalization of the Los Angeles River.

The Project has also raised significant concerns related to displacement of local residents. Residents and community partners have reported to LAROSAH that a significant increase in landlord harassment and evictions of long-term residents as development activity has increased in the area. As two of the lowest income neighborhoods in Los Angeles, Chinatown and Solano Canyon are home to residents at high risk for displacement and homelessness. Given that the majority of residents are transit-dependent, and, in fact, many even walk to work, the Project's displacement impacts will have a demonstrable effect on the environment. Several studies have shown that greenhouse gas emissions increase when low-income, transit-dependent residents are supplanted by wealthier, car-owning residents in transit-rich neighborhoods.

General Plan and Cornfield-Arroyo Seco Specific Plan

CEQA Guidelines § 15125 (d) states, “The DEIR shall discuss any inconsistencies between the proposed project and applicable general plans, specific plans and regional plans.” The Project will require several permits and approvals from the City of Los Angeles, including a General Plan Amendment to change the land use designation of the Project site from Light Industrial to Regional Commercial, a Zone Change, a height district change, and the approval of a Site Plan Review.” The DEIR should discuss potential inconsistencies between the proposed Project and the City of Los Angeles General Plan and any other applicable specific and regional plans.

After reviewing the public information about the Project, it is not clear to the Conservancy that the Project fits the CASP guidelines. As a community vision document, consistency with the CASP is important to ensure new development fits the public vision for the surrounding community. The CASP encourages development of a transit-oriented affordable neighborhood with opportunities for sustainable residential and commercial growth. This seems at odds with a Project that has the potential rapidly to increase neighborhood median residential and commercial rent. The Project’s potential further to destabilize neighborhood affordability and community integrity should be discussed generally in the DEIR as well in reference to CASP consistency. Furthermore, it would be helpful to have a more thorough discussion of which mitigation measures will be taken to ensure that the proposed Project does not disrupt the existing community.

The Project’s potential deviations to the General Plan and CASP represent a significant potential financial windfall to the developer at the expense of the community’s vision for the neighborhood. Thus, the Project should not be approved without detailed input from the multilingual and multi-generational existing neighborhood population. Given the scale of the Project and inconsistencies with the CASP, the Project currently conflicts with applicable land use plans, policies, and regulations. This sets a troublesome precedent for the neighborhood and could create a domino effect, enabling future projects that seek to alter the character of the neighborhood in fundamental ways without serious community consideration and input and is in violation of the CASP.

Impacts on Los Angeles State Historic Park

The Conservancy is concerned about the Project’s potential to interfere with the public’s use and enjoyment of LASHP. The DEIR should consider the current and future use of the LASHP. The DEIR should include comprehensive mitigation discussions in relation to LASHP, especially in regard to likely significant permanent increases in ambient noise levels in the project vicinity and substantial population growth. The Project should not

have a significant impact on State Park's ability to serve the public as well as provide an important island of habitat for wildlife sensitive to noise, light, pollution and human presence, especially in the hours after the LASHP is closed for the night.

Scenic and Aesthetic Value

The proposed Project will include three seven-story buildings, one eight-story building, one thirteen-story building, and one-fourteen story building. The DEIR should discuss and analyze the effects these tall buildings will have on the scenic and aesthetic value of the park. Will the buildings cast any shadows on the State Park? How might this affect the usability and aesthetics of the park? The CASP requires buildings to be designed not to project any shadow for more than 1.5 hours total on any park or open space between 10:00 a.m. and 2:00 p.m. on December 21.

The public made substantial investments into the design and aesthetics of LASHP in line with the requirements and goals of both the community and the CASP. The Park provides, thanks to careful design, one of the few unobstructed and local public viewing areas of both the downtown skyline and the historic North Broadway Bridge. How will the Project, with buildings possibly as tall as 170 feet, affect these viewsheds?

Public Access and Use

The DEIR should discuss and analyze how the Project will impact public access and use of the park. Will the Project allow community members and pedestrians north of Broadway to cross through the Project site to access the park? Will the Project include other public accessways? Will the Project interfere with the public's ability to use the park for recreational, social, and cultural events? What about revenue generating events? The DEIR should include mitigation measures and project alternatives that will ensure the Project does not interfere with the public's use of the park. For example, the DEIR should explore a mitigation measure that would require the construction of a bridge to connect the surrounding communities to the park.

Cultural and Historic Resource

The park is a historic resource, and it is known to contain Native American cultural resources, and notably the remnants of the Zanja Madre. The DEIR should discuss if the Project will disturb the park's historic and cultural resources and include project alternatives and mitigation measures that address the significant effects on these resources. The resources are important to the history of Los Angeles, cannot be replaced, should not be removed without careful analysis of alternatives, and, as historically

significant, are prioritized by the CASP. The DEIR's discussion should be consistent with CEQA Guidelines sections 15064.5 and 15126.4(b).

The Project's Public Spaces

The Project description mentions 2.22 acres of proposed public open space, including two public linear parks and two public outdoor plazas. The Conservancy commends the public space dedication, but encourages such a large project to set aside more funding and area for open space. The DEIR should discuss the design of these outdoor spaces and if these spaces will also be closed to the public for private events, and the frequency. Community input should be considered, and the outdoor spaces should be designed to best fit the needs of the local residents.

Development Impacts on Local Communities

The Conservancy is concerned about the potential development impacts on local communities, including the potential for increased population concentrations, altered population distribution and displacement of local residents, and increased burdens on existing community services. CEQA requires the DEIR to "discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment." This analysis should look at the potential impacts of the Project on existing community services and discuss whether the project will "encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively."¹

In order to address the potential impacts the Project may have on population distribution and the displacement of local residents, the DEIR should analyze and consider mitigation measures such as one requiring a number of housing units to be set aside for affordable housing.

Stormwater and Flood Potential

The proposed Project is at a significantly higher elevation than the park. The Conservancy would like to see a thorough analysis in the DEIR to discuss how the Project will mitigate storm water runoff from the Project to LASHP, the surrounding properties, and the Los Angeles River. This analysis should discuss both construction and permanent impacts.

¹ Cal. Code Regs. tit. 14, § 15126.2

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If you have any questions for our agency, please contact Jeff Maloney, Chief Staff Counsel at 323-221-9944, ext. 101, by email at maloney@smmc.ca.gov, or at 570 W. Ave 26, #100, Los Angeles, CA 90065. Thank you for your time and consideration.

Sincerely,

IRMA MUÑOZ
Chairperson