

CITY OF LOS ANGELES

CALIFORNIA

HISTORIC HIGHLAND PARK NEIGHBORHOOD COUNCIL

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Certified as NC #33 May 28, 2002

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To: Zoning Administrator

Project Title: ENV-2013-221-MND

Case Number(s): CPC-2013-226-SPE-CU-ZAA-CCMP-SPP, VTT-72147, AA-2013-222-PMLA,
AA-2013-223-PMLA

Project Location: Site 1: 119 N. Avenue 56; Site 2: 5712 E. Marmion Way (123 & 125 N.
Avenue 57 and 5706, 5708, & 5712 E. Marmion Way); Site 3: 124 N. Avenue 59 (124,
128, and 132 N. Avenue 59)

The Historic Highland Park Neighborhood Council represents over 60,000 Los Angeles stakeholders who reside, own property, or conduct business in our neighborhood. On behalf of our stakeholders, and after much consideration and community input regarding the above mentioned proposed project for an 80 unit housing development to be built in the core of the Highland Park Historic District on existing public parking lots, the Historic Highland Park Neighborhood Council (HHPNC) has concluded the following:

The HHPNC requests that a narrowed EIR be performed on this project because we feel that certain criteria in the MND will have potentially significant impacts that are not being mitigated; to include, but not limited to, as follows:

- I-120, Aesthetics: It is the general consensus that the multi-story brick façade building proposed for site 2 is out of character for the other structures in the project and for neighboring structures in the area, specifically in height, mass, and architecture style. It is the general consensus that the massiveness, height and

density of the proposed development on site 2 is too large, dwarfing the size and feel of the neighboring single family homes and the other homes in the project.

- III-10, Air Pollution (Demolition, Grading, and Construction Activities): There is reasonable concern that there would be substantial increase in exhaust emissions during construction that , although addressed in the MND, would not be reasonably enforceable.
- V-50, Cultural/Historic Resources: Highland Park has a documented history of celebrating and preserving its natural surroundings. Historically, structures in Highland Park have been smaller in scale and constructed with materials that are harmonious to their natural surroundings. Historically their size are harmonious with the natural canyons, waterways, parks and hills in the area. It is the general consensus that the multi-story brick façade building proposed for site 2 would have a negative impact on the vistas of and from neighboring parklands and mountains, and would interfere with the natural sunlight to surrounding properties and public areas. The proposed aesthetic design of the same building on site 2 is not, in scale or in character, conforming to the prevailing historic architecture of the neighborhood, and there is a probability of non-compliance with the Highland Park-Garvanza Historic Plan.

The completion of the project in its entirety sets a precedent for future non-conforming development in the area that will further negatively impact the preservation of the community's historic character.

In general, the consensus is that the proposed project is out of context with the community's history and heritage of blending housing with its natural surroundings harmoniously.

- VI- 20: Erosion: Runoff from constant wetting of the construction area during construction will contribute to pollution in the Arroyo Seco, a vital tributary in the LA River watershed system, and a natural waterway that carries alpine run off from the San Gabriel Mountains to the LA River. This will cause erosion of plant and wildlife in the river, and will have further negative impact on the regional efforts to restore natural and recreational resources in the LA River.
- VII-10, Greenhouse Gas Emissions: The particulate matter from increased automobile traffic and greenhouse gasses from the increase in general human consumption (air

conditioning, refrigeration, gardening, pet waste, etc.) will have a negative impact on the air and water quality in the area.

- XIV-10, Public Services: There is reasonable concern that many of the public service departments in the City of Los Angeles are not adequately prepared for the increase in public demand that will come with the implementation of this project. This concern is based on stakeholders' current experiences with City of Los Angeles response time to existing neighborhood issues.
- XV-10, Recreation: It is the general consensus that the proposed mitigation to pay Quimbly fees does not adequately provide a clear plan or vision of how to address the impact this project will have on the already extremely high demand for safe, green, open recreational spaces in the immediate neighborhood.
- XVII-20, Utilities (Local Water Supplies, All New Construction): The implementation of wetting construction areas twice daily would deplete local water resources.
- XVII-90, Utilities (Electricity/ Plumbing): There is reasonable concern that the City of Los Angeles Sanitation Services and the Department of Water and Power are not adequately prepared for the increase in demand that will come with the implementation of this project. This concern is based on stakeholders' current experiences with lengthy power outages, and plumbing issues caused by antiquated pipes and old tree roots in the area.

Furthermore, we have reason to believe that the City of Los Angeles Planning Department failed to insure compliance with a number of CEQA guidelines during the MND processes. Attached "exhibit A" contains footnotes from the Land Use Committee research team, showing just a handful of examples of these guidelines that we believe were either not enforced or not given proper due diligence.

Sincerely,



Monica Alcaraz, President
Historic Highland Park Neighborhood Council