

September 19, 2019

VIA EMAIL

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Los Angeles City Council
Planning and Land Use Management Committee
200 North Spring St.
Los Angeles, CA 90012

Also posted to: <https://cityclerk.lacity.org/publiccomment/>

Re: September 20, 2109 Agenda Item (7), Council File 13-1482-S3

To the Honorable City Council:

The AIDS Healthcare Foundation (AHF) objects to the proposed transfer of “land use authority” from the Community Redevelopment Agency (CRA) to the City. As previously stated by AHF, the environmental impacts of the transfer have neither been fully disclosed nor analyzed. Moreover, the Resolution and Ordinances contain flaws and fail to fully and appropriately transfer the authority of the Community Redevelopment Agency as required by state law.

AHF hereby incorporates the September 16, 2019 letter by Daniel Wright of the Silverstein Law Firm on behalf of La Mirada Avenue Neighborhood Association of Hollywood, as its own comments. In brief, AHF concurs with the September 16th letter’s analysis of the failings of both the environmental review and the substance of the Resolution and Ordinance.

Given the conflict between the Community Redevelopment Agency and the City planning department over the applicability of the Transit Oriented Communities Guidelines (TOC Guidelines) in redevelopment areas, it is abundantly clear that the purpose of this transfer is to wrest the interpretative authority over Redevelopment Plans from the CRA to the City planning department. The TOC Guidelines allow density increases far exceeding those permitted in the various Redevelopment Plans, and at present the Planning Department has agreed that projects in the Hollywood and North Hollywood Redevelopment Plan areas are

subject to the density limits in the redevelopment plans. However, in staff reports regarding the proposed transfer, the City planning department made clear that such an approach is only temporary, contending that transferring the authority of CRA to the City “will allow the City to holistically analyze and interpret the goal/intent of the unexpired Redevelopment Plan and determine steps necessary to maintain consistency with State and local laws.”

It is thus more than reasonably foreseeable that as a result of the transfer of authority, the density limits in the Redevelopment plans will be supplanted by those of the TOC Guidelines (in areas within ½ mile of “high quality” transit). The Negative Declaration even admits as such, but dismisses the potential for impact by stating that such development would be generally compatible with City policies. The City has taken the position that the TOC Guidelines did not require review under CEQA because they were adopted as the result of a voter initiative, a dubious proposition given how significantly those guidelines deviate from the requirements of the initiative that allowed for such guidelines. In Redevelopment Plan area, the environmental impacts of adopting the TOC Guidelines’ density limitations should be analyzed now, while it is reasonably foreseeable that as a result of the transfer those limits will be newly applied in areas that are not currently subject to them. The resultant potential environmental impact will be increased noise, air quality impacts, displacement of residents, additional traffic, and demands on public services.

The City Council should not adopt the Resolution and Ordinances but should instead demand that the Planning Department conduct a full and adequate environmental analysis of the impacts of the proposed action.



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