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**CF14-0267 CPC-2013-7-GPA-ZC-ZAD-SPR USC**

1 message

**Sharon Gin** <sharon.gin@lacity.org>  
 To: Etta Armstrong <etta.armstrong@lacity.org>

Tue, Mar 25, 2014 at 12:23 PM

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From: **Joyce Dillard** <dillardjoyce@yahoo.com>  
 Date: Tue, Mar 25, 2014 at 12:03 PM  
 Subject: Comments to PLUM-Agenda No. 3-CF14-0267 CPC-2013-7-GPA-ZC-ZAD-SPR USC  
 To: Sharon Gin <Sharon.Gin@lacity.org>

The Proposed General Plan Amendment and Zone Change and Findings of the City Planning Commission is NOT consistent with the General Plan and should be disapproved as well as the Addendum to the Certified Environmental Impact Report (ENV-2004-1950-EIR) and Adopted Mitigation Monitoring Program and Mandatory Findings of Significance. The request is inconsistent with the Framework Element.

General Plan Amendments have exceeded the calendar year maximum (4) allowed under Government Code 65358:

Ordinance 182859 effective 2/23/2014 CPC-2012-1363-GPA-ZC-BL-SPR  
 Ordinance 182860 effective 2/23/2014 CPC-2012-1363-GPA-ZC-BL-SPR  
 Ordinance 182908 effective 4/6/2014 CPC-2009-3210-GPA-ZC-HD  
 Ordinance 182938 effective 4/21/2014 CPC-2012-2558-GPA-ZC-SP-CA  
 Ordinance 182942 effective 4/23/2014 CPC-2012-2894-ZC-GPA

Mandatory Findings of Significance for the Framework Element states the central objectives:

- (1) improve air quality;
- (2) mitigate traffic impacts of additional growth;
- (3) improve the City's distribution of land uses and its urban form pattern to protect the character of low-density residential neighborhoods;
- (4) encourage quality development, pedestrian activity, and transit use;
- (5) revitalize and improve strip commercial development with mixed use commercial and residential development;
- (6) improve the City's employment base, especially in economically disinvested neighborhoods; and
- (7) assess the status of supporting infrastructure and public services relative to growth and development activity.

The requested actions do not conform to the central objectives and threaten infrastructure, public services, and quality of life.

You state:

ADDENDUM TO THE ENVIRONMENTAL IMPACT REPORT FOR THE USC HEALTH SCIENCES CAMPUS PROJECT indicates:

*2. Modified Project Impacts*  
*(a) Consistency with Local and Regional Plans*

*Therefore, like the Original Project, the Modified Project would further Community Plan Policy 6-1.1, which seeks to "encourage compatibility in school locations, site layout, and architectural design with adjacent land uses and community character."*

Comments:

**Northeast Los Angeles Community Plan states:**

**SCHOOLS**

**GOAL 6 APPROPRIATE LOCATIONS AND ADEQUATE FACILITIES FOR SCHOOLS TO SERVE THE NEEDS OF EXISTING AND FUTURE POPULATION.**

**Objective 6-1** To site schools in locations complementary to existing land uses and community character.

**Policies**

6.1.1 Encourage compatibility in school locations, site layout, and architectural design with adjacent land uses and community character; use schools, as appropriate, to create logical transitions and buffers between uses such as multiple-family and single-family residential or commercial and residential uses.

No schools are sited. This is a University Research institution which is not the intent of Goal 6.

You state:

ADDENDUM TO THE ENVIRONMENTAL IMPACT REPORT FOR THE USC HEALTH SCIENCES CAMPUS PROJECT indicates:

*2. Modified Project Impacts*  
*(a) Consistency with Local and Regional Plans*

*The Modified Project would also further specific goals, objectives, and policies related to Community Centers included in the City of Los Angeles General Plan Framework. In particular, with implementation of the proposed pedestrian enhancements and aesthetic improvements, the Modified Project would further Goal 3, "to provide a pedestrian-oriented, high activity, multi- and mixed use center that supports and provides identity for Los Angeles' communities."*

Comments:

**Northeast Los Angeles Community Plan states:**

**INDUSTRIAL**

Northeast Los Angeles has a long history of industrial development because of its central location and proximity to major transportation facilities. Functional obsolescence is common as evidenced by the number of abandoned, and underutilized industrial properties, with the largest concentration near the Los Angeles River and a secondary concentration along the rail line that generally follows Main Street and Valley Boulevard.

**Redevelopment of these areas is problematic because of antiquated structures, poorly configured or fragmented land holdings, inadequate infrastructure, and toxic contaminations. Some of the sites, notably the Taylor Yard, offer enormous potential for redevelopment**

Industrial uses provide needed employment opportunities and economic benefits to the community and should be encouraged when impacts to surrounding land uses can be mitigated. **However, industrial sites that are adjacent to residential and commercial properties provide a serious challenge to plans because of incompatibilities**

### **GOAL 3**

**SUFFICIENT LAND FOR THE RANGE OF INDUSTRIAL USES NECESSARY TO PROVIDE MAXIMUM EMPLOYMENT OPPORTUNITIES, ESPECIALLY FOR LOCAL RESIDENTS; THAT ARE SAFE FOR THE ENVIRONMENT AND THE WORK FORCE; AND HAVE MINIMAL ADVERSE IMPACT ON ADJACENT USES AND INFRASTRUCTURE RESOURCES.**

You have incorrectly stated GOAL 3 in the **Northeast Los Angeles Community Plan**, but stated the goal in the FRAMEWORK ELEMENT.

You state:

ADDENDUM TO THE ENVIRONMENTAL IMPACT REPORT FOR THE USC HEALTH SCIENCES CAMPUS PROJECT indicates:

#### *2. Modified Project Impacts*

##### *(a) Consistency with Local and Regional Plans*

*In addition, with the provision of new student housing, hotel, and additional medical clinic, and academic and/or medical research facilities, the Modified Project would support Objective 3.9, to “reinforce existing community centers, which accommodate a broad range of uses that serve the needs of adjacent residents, promote neighborhood and community activity, are compatible with adjacent neighborhoods, and are developed to be desirable places in which to live, work, and visit, both in daytime and nighttime.”*

Comments:

OBJECTIVE 3.9 does not exist in the **Northeast Los Angeles Community Plan**, but is a stated objective in the FRAMEWORK ELEMENT.

You state:

ADDENDUM TO THE ENVIRONMENTAL IMPACT REPORT FOR THE USC HEALTH

SCIENCES CAMPUS PROJECT indicates:

2. *Modified Project Impacts*  
 (a) *Consistency with Local and Regional Plans*

Modified Project would be consistent with Policy 3.9.2 to "encourage the integration of school classrooms, libraries, and similar educational and cultural facilities within commercial, office, and mixed commercial-residential structures."

Comments:

POLICY 3.9.2 does not exist in the **Northeast Los Angeles Community Plan**, but is a stated policy in the FRAMEWORK ELEMENT. There is no NEEDS ASSESSMENT of adjacent residents or identification of neighborhood and community activity within the **Northeast Los Angeles Community Plan**.

**FRAMEWORK ELEMENT**

**GOAL 3**

Pedestrian-oriented, high activity, multi- and mixed-use centers that support and provide identity for Los Angeles' communities.

*Objective 3.9*

Reinforce existing and encourage new community centers, which accommodate a broad range of uses that serve the needs of adjacent residents, promote neighborhood and community activity, are compatible with adjacent neighborhoods, and are developed to be desirable places in which to live, work and visit, both in daytime and nighttime.

*Policies*

*Uses and Density*

3.9.2 Encourage the integration of school classrooms, libraries, and similar educational and cultural facilities within commercial, office, and mixed commercial-residential structures

You state:

ADDENDUM TO THE ENVIRONMENTAL IMPACT REPORT FOR THE USC HEALTH SCIENCES CAMPUS PROJECT indicates:

2. *Modified Project Impacts*  
 (a) *Consistency with Local and Regional Plans*

Modified Project would also further Policy 3.9.7 to "provide for the development of public streetscape improvements."

Comments:

POLICY 3.9.7 does not exist in the **Northeast Los Angeles Community Plan**, but is a stated policy in the FRAMEWORK ELEMENT. There is no finding of appropriateness of this policy in the **Northeast Los Angeles Community Plan**.

**FRAMEWORK ELEMENT****GOAL 3**

Pedestrian-oriented, high activity, multi- and mixed-use centers that support and provide identity for Los Angeles' communities.

*Objective 3.9*

Reinforce existing and encourage new community centers, which accommodate a broad range of uses that serve the needs of adjacent residents, promote neighborhood and community activity, are compatible with adjacent neighborhoods, and are developed to be desirable places in which to live, work and visit, both in daytime and nighttime.

*Policies**Design and Development*

3.9.7 Provide for the development of public streetscape improvements, where appropriate

You state:

ADDENDUM TO THE ENVIRONMENTAL IMPACT REPORT FOR THE USC HEALTH SCIENCES CAMPUS PROJECT indicates:

*2. Modified Project Impacts**(a) Consistency with Local and Regional Plans*

Modified Project would further the Redevelopment Plan's goal/objective to "support and encourage a **circulation system** that will improve the quality of life in the Redevelopment Plan Area, including pedestrian, automobile, parking, and mass transit system, with emphasis on serving existing facilities and meeting future needs."

Comments:

**Adelante Eastside Redevelopment Plan states:**

*§ 1 06. Project Objectives*

*The objectives of this Project with respect to the Project Area are as follows:*

*General*

*10. Support and encourage a circulation system that will improve the quality of life in the Project Area, including pedestrian, automobile, parking, and mass transit systems, with emphasis on serving existing facilities and meeting future needs.*

The CIRCULATION ELEMENT, a mandatory element enacted in 1955, has never been adopted; therefore, the Objective is not met. Goods movement is neglected as is pipelines and military transport.

You state:

ADDENDUM TO THE ENVIRONMENTAL IMPACT REPORT FOR THE USC HEALTH SCIENCES CAMPUS PROJECT indicates:

*2. Modified Project Impacts*

*(a) Consistency with Local and Regional Plans*

*Modified Project would also further the Redevelopment Plan's goals/objectives to "preserve and increase employment, training, business, and investment opportunities through redevelopment programs."*

Comments:

**Adelante Eastside Redevelopment Plan states:**

**§ 1 06. Project Objectives**

*The objectives of this Project with respect to the Project Area are as follows:*

*General*

**4. Preserve and increase employment, training, business and investment opportunities through redevelopment programs, and to the greatest extent feasible, promote these opportunities for residents who **reside in or adjacent to the Project Area and for businesses that are located in the Project Area.****

Objective 4 is not met as this is a campus expansion with extremely limited opportunity for the low-income, non-professional residents who reside in or adjacent to the Project Area.

CONSERVATION and OPEN SPACE ELEMENTS have been required since 1970. OPEN SPACE ELEMENT does not exist and the CONSERVATION ELEMENT was approved September 26, 2001. Greenhouse Gas Emissions (AB 32) are omitted as the Elements have not been updated with current information. Governor's Office of Planning and Research OPR have worked with Local Governments on Climate Adaptation issues (Cal-Adapt) and are issuing guidance for the inclusion of:

1. Economics
2. Equity
3. Climate Change
4. Healthy Communities

OPR requires COMPLETE STREETS and the CIRCULATION ELEMENT and Community and Military Compatibility Planning with the General Plan.

SAFETY ELEMENT was adopted November 26, 1996 and infrastructure and public services have not been taken into consideration to maintain PUBLIC HEALTH and SAFETY. The properties are WITHIN A FAULT ZONE. The fault needs to be mapped and identified.

US Army Corps of Engineers USACE has released the LOS ANGELES RIVER ECOSYSTEM RESTORATION INTEGRATED FEASIBILITY REPORT. Hazard Park Wetlands has not been addressed in relationship to that restoration. No analysis or impacts have been analyzed in relationship to the ecosystem, habitat, wildlife, groundwater contamination and the related

infrastructure in the project area for the adjoining projects (Piggyback Yard) in the USACE study for Alternative 20 RIVER Riparian Integration via Varied Ecological Reintroduction.

Flood Risk Management needs to be addressed.

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