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MISSION RFT/SR LLC

February 12, 2019

Councilmember Marqueece Harris Dawson, Chair
Councilmembers of the PLUM Committee
200 North Spring Street
Los Angeles, California 90012

Date: 2/12/19
Submitted in: PLUM Committee
Council File No. 19-0023
Item No. 5
Deputy: Communication from PubliZ

Re: Agenda Item No. 5 – 942 N. Broadway

Dear Councilmembers:

We are the owners of the Capitol Milling Company, which shares a property line with the site of the proposed project at 942 North Broadway. While we support positive investment in this area, we have significant concerns regarding the proposed project which have not been addressed and are requesting that the City delay any determination on the current environmental exemption. The additional time is necessary to remedy the flawed CEQA exemption analysis and protect an important historic resource, as well as provide an opportunity for us to engage with the applicant in an effort to amicably resolve these sensitive issues. We have asked numerous times for materials from the project developer and have expressed our serious concerns that their construction, excavation and shoring analysis address the fact that they are building immediately next to an 1850's building and regrettably our concerns are being ignored and dismissed.

The Capital Milling building is one of the oldest remaining industrial structures in the City of Los Angeles. Our primary concern is that any project at 942 North Broadway be designed and carried out in a manner that will protect the historic and physical integrity of the Capitol Milling Company building, which dates to the 1850s. The City has determined that the building is eligible for listing on the National Register of Historic Places and the California Register of Historical Resources and as a Los Angeles Cultural-Historic Monument. We are surprised at the complete lack of analysis of impacts to this historic building which immediately abuts the 942 N. Broadway project site where extensive excavation and construction will occur. The exemption and historic resource report submitted for 942 N. Broadway is inconsistent with the City past position on the Capital Milling building.

The analysis set forth in the draft CEQA Exemption document fails to fully analyze the construction and operational impacts from the proposed project to this important historic resource. This is particularly concerning as the proposed project is located within a liquefaction zone. A more comprehensive environmental analysis would allow the proposed project to develop design features and/or mitigation measures to adequately protect this historic resource before, during and after construction. Without this additional analysis, the City cannot make the findings for a CEQA exemption or the requested entitlement approvals.

We believe the additional time will provide the opportunity to address these issues and incorporate the appropriate measures to protect an important Los Angeles historic resource. We thank you for considering this request.

Sincerely,


Steve Riboli
Managing Partner