



Isabel Onate &lt;isabel.onate@lacity.org&gt;

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## Public Comment Council File #19-0023: 942 North Broadway / Sustainables Communities Project / Exemption

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'Phyllis Ling' via Clerk-PLUM-Committee <clerk.plumcommittee@lacity.org>

Tue, Feb 19, 2019 at 4:38 PM

Reply-To: Phyllis Ling &lt;pling@yahoo.com&gt;

To: councilmember.cedillo@lacity.org, clerk.cps@lacity.org, clerk.plumcommittee@lacity.org, councilmember.harris-dawson@lacity.org, councilmember.blumenfield@lacity.org, councilmember.price@lacity.org, councilmember.smith@lacity.org

February 19, 2019

Councilmember Gilbert Cedillo  
Councilmembers of the PLUM Committee  
Honorable City Councilmembers

City Council Agenda for Wednesday February 20, Agenda Item #16

SUBJECT: Council File #19-0023: 942 North Broadway / Sustainables Communities Project / Exemption

Public Comment AGAINST approval

Dear Honorable Councilmembers,

I am a nearby resident who lives on Savoy Street, within walking distance of the proposed project at [942 N Broadway](#). I would like to extend slightly belated Happy Chinese New Year best wishes to City Council.

I am writing to express my concern regarding possible approval of CEQA exemption of the project at [942 N Broadway](#), in Chinatown, under the Sustainable Communities Project Exemption, as a Transit Priority Project. I ask that City Council delay a determination of this exemption until the Chinatown community has sufficient opportunity to comment.

**Chinese New Year was on February 5.** Many have been busy with family and festivities that typically extend for two full weeks. For example, one of the major New Year events happened this past weekend (February 16-17): the 41st annual Firecracker 5k/10k, which kicked off directly in front of the project site on North Broadway. I am one of many who belatedly heard about the PLUM hearing that happened on February 12. If the City Council moves forward with the exemption immediately after the Chinese New Year period, it will come across as blatant attempt to avoid community feedback.

Regarding the merits of the exemption, "sustainability" is the keyword. However, if a project is **to be truly sustainable in Chinatown, it would need to provide more than 6% affordable housing**, due to the low income of residents in the area. In comparison, the tallest building in Chinatown is Cathay Manor, which is 16 stories, and is 100% low income affordable senior housing. Furthermore, **the assertion that this project is generally consistent in scale and density is based on an outdated, one-size-fits-all General Plan** that zones the site as C2 with unlimited height. Categorizing this portion of Chinatown as an "urban" or "city" area where buildings are between 5 and 40 stories ignores the prevailing scale of the area, which also contains numerous historically significant sites including New Chinatown, Central Plaza, Capitol Milling Company, Chinese American Historical Society, and many more according to SurveyLA. Most of these buildings are two stories, but all are fewer than 10 stories. Unless there are plans to raise Chinatown yet again, many of these buildings are here to stay. Even Blossom Plaza, which was built next to the project site several years ago, is only 5 stories. Attached are photos of this immediate area for reference.



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Another reason why an EIR should be required is the already poor air quality in Chinatown. A recent study by USC found that the **air quality in Chinatown is the worst of all of Southern California neighborhoods**, due in large part to the geographical context and built environment (<https://news.usc.edu/144493/air-pollution-in-los-angeles-county-neighborhoods/>). Due to the uniquely poor air quality in Chinatown and continued risk for sensitive people, especially children and the elderly, any development of this size should have to provide a more detailed analysis of impacts to air pollution.

On a positive note, I appreciate the attention to preserving the Zanja Madre. My hope is that the commitment will be made stronger to keep it preserved in place, as the current wording states it as a possibility.

Chinatown is undergoing significant change, and we should all be open to progress. However, the issues of the timing of the hearings during the holidays, the assumptions of consistency of density and scale based on the outdated General Plan, issues of affordable housing, and uniquely bad air quality in Chinatown — all should warrant a pause in this process and further analysis of the criteria used to determine whether this development is likely to contribute to a sustainable Chinatown community. I urge City Council to postpone a decision on this exemption.

Sincerely,

Phyllis Ling

February 19, 2019

Dear City Councilmembers,

I am highly disappointed because it appears as though the CEQA exemption for the project at 942 North Broadway is being forced through City Council without adequate opportunity for public comment. People in Chinatown have been extremely busy in the past several weeks with Chinese New Year events and festivities.

Regarding the Sustainable Communities criteria for the exemption, 27 stories is not consistent with the scale in Chinatown when you look at recent projects such as Blossom Plaza, Jia, and La Plaza Cultura Village. In addition, all of these recent developments, which are 5 to 7 story mid rises, are located at prominent corners in Chinatown, where you would expect larger development. 942 North Broadway, however, is a midblock location, for what would be the first high rise building in Chinatown.

There are also several issues regarding utility service to the property, disruption to the community and traffic during construction, and impacts to air quality – all of which require further analysis prior to granting exemptions and approvals for such a major project in the Chinatown community.

I urge City Council to not approve the CEQA exemption at this time.

Sincerely,

  
Don Toy