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Aug. 1, 2019

Department of City Planning
PLANNING COMMISSION

Attn.: Jordan Turner

Project Site: 2465-2467 S. Purdue Ave.
Case No: DIR-2018-3411-TOC-1A
CEQA No: ENV-2018-3412-CE

Dear Mr. Turner:

As per your instructions please find e-mailed to you the copies of our correspondence regarding our appeals of the above stated case and project. The original Appeal Application was filed and paid for on January 3, 2019.

In our Appeal we stated in detail our objections and misgivings of the proposed project. Let us underline herewith again a summary of reasons for our appeal to deny the project.

1. The West Los Angeles Neighborhood Council has not approved the project in three separate meetings.
2. The totality of the building is violating the prevailing zoning restrictions of R3-1 and does not adhere to the density and height restrictions.
3. The project is not in an area zoned and designated for 5 stories and 17 units. We are appealing the height, scale, type and the incentive of unbundled parking.
4. Our two stories building next to the proposed building is 10 units with all its patio (outdoor) spaces oriented towards the proposed building. The sheer wall of the building will block our building's air circulation and sunlight due to the 30% reduced side yard and 25% reduced open space front yard. It will also allow toxic emissions from the freeway to build up.
5. The building does not conform to the Citywide Multi Family Design guidelines in addressing transitional height which in this case will cause the sounds from the freeway to be amplified and rebound from the straight over towering building. This will seriously impact our building.
6. The building is incompatible in scale, height, massing and style. It is too tall and due to its over shadowing block design and height will devalue the quality of our building as well as the neighborhood.

The ruling in favor of the building as currently proposed would in essence allow the Applicant an undue financial advantage!

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7. Since the TOC forces only 13% of the city to bear increasing density we as neighbors request the denial of this commercial sized and character building on our street. We should be given priority, not developers and not future residents who do not live there. The need for housing is not an excuse to approve projects that are out of character and tower over the existing longtime homes.
8. The building will result in significant effects relating to traffic, noise and air quality. We are very concerned about the inadequate space for parking. Our 10 unit building provides 16 parking spaces. The proposed 17 unit building provides for Unbundled Parking which allows for parking 'rented separately from the units'. The current street parking is at capacity. Purdue is a very narrow street with parking in both directions and should not be further impacted by the inadequate parking provided by the proposed project.
9. We believe that the City Planning Department (Mr. Hendricks and Jordann Turner) erred in their decision making by erroneously describing 2465 Purdue as being both a six-story building with subterranean parking (pg.6) and a four-story building with podium parking (Pg.11). Neither of these descriptions is correct as the plans show a five story building and underground parking.

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CASE NUMBER: DIR – 2018 – 3411 – TOC-1A

Project Address: 2465 Purdue Ave., Los Angeles, CA 90064

CEQA: ENV-2018-2412-CE

JUSTIFICATION FOR APPEAL

We are appealing the determination for the proposed building at 2465 Purdue due to its height, scale, type and the incentive of unbundled parking. It would be entirely incompatible in scale, massing, and style than the other existing structures in the surrounding neighborhood.

The building would be commercial in size and would negatively and permanently impact the health and well being of our tenants, the stakeholders in our neighborhood and community. Purdue has predominantly one and two story, single family homes (4), with one story “Rosie the Riveter”, Spanish, and mid-century style, low density fourplexes (6), as well as two story mid-density apartments (8). The southern end of Purdue is zoned R-1 with single family homes (6). Only one apartment on the corner (south) that is spread over three lots is 3.5 stories. (Exhibit A). **There are no 4 story buildings.**

The proposed building would be three-story taller than our building (on the south side) and would not provide a sensitive transition to the single story and two-story buildings adjacent and the majority of Purdue as a whole.

The project ignored Citywide Design Guidelines, Community Guidelines and WLA TIMP to which it is supposed to adhere pursuant to Section V: 4 of the TOC Guidelines.

As stated under Measure JJJ the Department of City Planning had only 90 days to write the TOC guidelines. Draft guidelines were released. Perhaps those time constraints led the Department to consider receiving only 16 letters as adequate “public comment”.

As they stand, TOC forces only 13% of the city to bear increasing density and public transit ridership for a city of nearly 4 million people--clearly an undue burden.

The latest amended guidelines were published (4/13/2018). At that time Micheal Ghodsi (owner of the proposed new building) submitted these current plans replacing original plans at LADBS for a 4 story 9 unit building of which we had few if any complaints.

Conflicting explanations surrounding ~~front setbacks, and transitional height~~ as well as a willingness to enforce Citywide Multi Family Design guidelines troubled us. Other stakeholders, tenants and neighbors recounted their conversations and correspondence to us as well, relaying they too found it difficult to get consistent answers.

At five stories plus mechanical equipment on the rooftop, this building is nearly **four times taller than 75% of buildings on Purdue and more than twice as tall as the remaining buildings.**

With 30% reduced side yard setbacks coupled with only 500 ft of the 1500 ft of outdoor space required (balconies aren't communal open space) on a completely concrete lot, this building
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would be drastically incompatible with our street and the surrounding neighborhood with almost zero landscaping, would devalue our property and business as well as other properties in the neighborhood .

It would also set an irresponsible precedent for other grossly incompatible buildings to be built in succession, further degrading the properties of the surrounding neighborhood.

Specific points at Issue/ How we are aggrieved by the decision:

- Location of the proposed new building is beyond the distance of 2640 ft. set forth in the TOC guidelines for a Tier 3 designation. The distance was measured by our neighbors on Purdue with an industry standard measuring device. This incorrect measurement allowed to be put forth by the applicant (apparently unverified by the city) aggrieves us as it is wrong, and would change the density, FAR, and yard setbacks if it is in fact a Tier 2 project.
- Height and Transitional Height: The building is too tall at five stories with no upper floor setbacks to mitigate the almost complete blocking of the sky and sunlight, as well as reduced air circulation and serious privacy issues.

The transitional height setback has not been applied to this project.

- The excessive height of this proposed five-story building (3 stories higher than our building on the South side) and just 5'7" from our building line would allow it to block sunlight and air circulation. It will dwarf any other structures which are single family homes, and two or three story buildings. keep in mind that Purdue Ave is not a major street; as a matter of fact it's a dead end in our block. Darkened by 2465 Purdue the rental value and property value of our property, the street and neighborhood are drastically reduced. This reduces future property taxes causing extended hardship to the city and state.

In addition, the height of this building would effectively and significantly block air circulation, trapping toxic emissions from the 405 freeway (to the east) and the 10 freeway (to the southwest) nearby. Currently the 45 foot height limit on Purdue and surrounding streets allows air circulation and keeps toxic emissions from building up. These emissions are a well documented health hazard with permanent adverse health effects for everyone, especially for children.

The building literally would jut straight up for more than 56 feet without adequate **transitional setbacks**, eliminating any privacy for our tenants and allow clear view into their homes and yards.

There are **plentiful examples of equal density buildings that are not this tall**. In no way would conform to design guidelines prohibit density and parking incentives.

- **The massive, unarticulated, flat, monotonous sides of the building:**
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This lack of design conformance effectively would create a 8,200 square feet, 56' tall, flat wall just 5'7" from our building and other homes. This ugly, flat, monotonous wall would block air circulation and trap toxic emissions from the 405 (to the east) and 10 (to the south) freeways. Without air circulation these toxic emissions build to unhealthy levels.

The massive, unarticulated sides of the building do not in any way conform to Citywide Design Guidelines. This building is literally an example of what not to do according to the Residential Citywide Design Guidelines and the Mar Vista Del Rey Community Plan of which both apply to this case. Sadly, this building which looks more like a dorm/prison, would be far worse.

The excessively big, flat sided walls would reflect constant 24 hr. traffic noise from the freeways and reflect enormous amount of heat, and eliminate any privacy. It looks like a cheap hotel in a blighted neighborhood. All exterior lighting on this building at this size and scale would illuminate inside residents' homes.

- Setbacks: The 30% reduced side yard setbacks.

This would effectively eliminate any privacy for our tenants and adjacent homes. There is no landscaping along the entire 30% reduced side yards as the space between property lines is completely concrete and narrow. It's so narrow that no two people can walk side by side. This is in **direct opposition to design conformance guidelines.**

The scale and increased FAR of this property would be absurd in comparison to any other building on Purdue. The neighborhood directly west is R1 zoned single family residential streets.

The entire lot is concrete because of underground parking right to the property line without any setback. That would virtually prohibits trees and landscaping.

- This building doesn't qualify for a CEQA class 32 exemption:

Approval of the project would definitely result in significant effects relating to traffic, noise, air quality, or water quality as therefore not eligible for an exemption. According to CEQA, an exemption "is not intended to be applied to projects which would result in any significant traffic, noise, air quality, or water quality effects."

- This project allows for Unbundled Parking, allowing for parking "rented separately from the units":

It is unclear if the net unit thresholds established by the Los Angeles Department of Transportation traffic analysis and study have taken into consideration the Unbundled Parking available for rent or sale at this building.

Also, it will increase the use of Lyft and Huber at this building. The traffic diversion app Waze, currently sends peak hour traffic down Purdue to avoid gridlock on Sawtelle, already

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exponentially increasing daily trips down Purdue and blocking driveways. The narrowness of the street makes it impossible for emergency vehicles to reach homes on Purdue at peak joy quite often. This building would make it even worse.

Also the reduction of parking would clearly increase the use of ridesharing services like Lyft and Huber that already increase daily trips and traffic .

The traffic diversion app Waze has causes considerable traffic and LOS with excessive wait times at both intersections on Exposition and Pearl.

Studies conducted in Los Angeles show a 2 minute delay reduces survival rates of heart attack and stroke victims from nearly 60% to close to 0%.

These factors clearly result in significant negative impacts related to safety.

Cumulative Impact: The cumulative impact over time is clearly significant. The proposed project at 5 stories with underground **unbundled parking** available to rent separately, significantly deviates from what is otherwise permitted by underlying zoning on the site.

Significant Effect Due To Unusual Circumstances:

The project is not in an area zoned and designated for 5 stories and 17 units.

It literally abuts R-1 single family zoning and the prevailing R3-1 on Purdue has both density and height restrictions that this property is not close to adhering to.

The subject site is not even close to being similar in size to nearby properties as stated in Citywide Design Guidelines. It abuts (north) a single story 4 unit property, and (south) a two story 10 unit apartment building and to the west R1 single family homes. Across the street are 2 single story, single family homes and a two story apartment. This project is **four times taller** than the majority of nearby properties.

This project also allows for **Unbundled Parking, which allows for parking “rented separately from the units”**.

The removal of 17 trees would further exacerbate these issues.

Clearly, this cannot be said of this building.

Why we believe the decision – makers erred or abused their discretion:

The decision makers (in this case Nick Hendricks and Jordann Turner) **falsely describe 2465 Purdue as being both a six-story building with subterranean parking (pg.6) and a four-story building with ‘podium’ parking. (Pg. 11)**. Neither of these descriptions is correct as the plans show **five stories and underground parking**.

These discrepancies are gravely disturbing. This obviously makes a reasonable person wonder what other discrepancies there are or have been overlooked and if the decision makers are even clear as to what is actually proposed. It speaks to some institutional negligence at the very least.

The decision makers describe the surrounding structures on Purdue as having four story buildings and structures similar in size and scale.

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There is **not a single four-story building** on Purdue or any structure remotely similar in size or scale of a 6 story building on a single 50/ 175 foot lot. Clearly a false statement that is also disturbing as it is easy to believe this misrepresentation of the height and scale and FAR of other buildings was intended to imply that the 2465 project is not grossly out of place and shows extreme deference to the builder and prejudice toward homeowners and other negatively affected stakeholders.

We quote here a meeting between with Jordan Turner and our neighbor Kathryn Schorr on October 26, 2018, when she was told “that design Conformance issues are not enforced as builders don’t like being told they have to change their buildings.”

That’s disturbing as city planners don’t work for this developer who has a financial interest in TOC guidelines that increase his profits by 70% and this deference speaks to a serious problem in the approval process.

Also, the decision makers don’t mention that in addition to abutting R-1 single-family residential homes to the west on Butler, a few lots south on Purdue is also R-1 residential homes. Sadly, these falsehoods and admissions appear to be a clear abuse of their discretion.

There is no reason to abandon Residential Citywide Guidelines and Community Plan Guidelines which this building would do.

PS: This proposed new building has already showed its negative effects on residents, on the value of the adjacent buildings since I have already received (1/2/2019) a 30-day notice from one of my best tenants to move out citing the construction of the said new building as one reason.

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