

Your Community Impact Statement has been successfully submitted to City Council and Committees.

If you have questions and/or concerns, please contact the Department of Neighborhood Empowerment at NCsupport@lacity.org.

This is an automated response, please do not reply to this email.

Contact Information

Neighborhood Council: Wilshire Center-Koreatown

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The Board approved this CIS by a vote of: Yea(13) Nay(0) Abstain(0) Ineligible(0) Recusal(0)

Date of NC Board Action: 02/02/2021

Type of NC Board Action: Against unless Amended

Impact Information

Date: 02/03/2021

Update to a Previous Input: No

Directed To: City Council and Committees

Council File Number: 20-0894

Agenda Date: 2/2/2021

Item Number: IV

Summary: The Wilshire Center Koreatown Neighborhood Council (WCKNC) supports the appeals filed for Case #20-0894 and the stakeholders' request for an Environmental Impact Review (EIR) for the proposed 23 and 28 story development at 3440 Wilshire Blvd. The WCKNC supports the appellants' request for an EIR based on but not limited to the following: Cultural Resources, Site Security, Public Services, Hazards and Hazardous Materials (i.e., development projects within the immediate area and greater WCKNC boundaries, removing 43), and Sustainability Features. An EIR gives the community the in-depth analysis a project of this scale deserves. The points raised by SAFER's experts over the MND compounded by SEIU and stakeholder concerns with respect to Jamison's reputation and current practices further underscore the need to better understand how this project would impact the community and our local ecosystem; the only way to meaningfully understand that is through an EIR. Furthermore, we oppose any further continuances requested on the part of the applicant who has ignored requests by both stakeholders and the council to meet and discuss concerns with this project. The board believes this project will have a profoundly negative impact on Wilshire-Center Koreatown's struggling economy, overburdened infrastructure, and locally affordable real estate stock. Additionally, increased housing stock alone is not a substantive argument for the lack of diligence on such an expansive project. The WCKNC, therefore, asks the PLUM committee to support the current appeals requesting an EIR for the development at 3440 Wilshire Blvd to ensure a transparent review process that thoroughly considers issues of environmental equity, health, and livability.

DATE: February 2, 2021

TO: LA City Council PLUM Committee

RE: Community Impact Statement in SUPPORT of Appeal for Case

#VTT-74602-2A. COUNCIL FILE: 20-0894

SUPPORT THE APPEAL REQUIRING APPLICANT TO FILE AN EIR

PASSED by VOTE: 13 Yes, 0 No, 0 Abstain

Honorable Members of the Los Angeles City Council PLUM Committee,

The Wilshire Center Koreatown Neighborhood Council (WCKNC) supports the appeals filed for Case #20-0894 and the stakeholders' request for an Environmental Impact Review (EIR) for the proposed 23 and 28 story development at 3440 Wilshire Blvd.

The WCKNC supports the appellants' request for an EIR based on but not limited to the following:

1. *Cultural Resources*: in 2009 the Wilshire Center and Koreatown Recovery Redevelopment Area CRA Intensive Historic Resources Survey identified 3440 Wilshire Blvd as a historical resource, "eligible for NR as an individual property through survey evaluation" as example of early Corporate Modern architecture representative work of the preeminent Los Angeles architect Claud Beelman. Additionally, stakeholders, film agencies, and businesses have raised valid concerns regarding the scale of the project and its impact on the Normandie Mariposa Historic District located 65-feet to the south and east of the Site. The project calls for two towers, more than 50 stories of development, 640 apartments, and more than 700,000-SF floor area. The Site is nearly half a city block, right next to multi-family residence and the Robert Kennedy Community School is nearby,
2. *Site Security*: while it was noted that "the Project would provide an extensive security program to ensure the safety" of the community, WCKNC has received numerous reports of unsafe conditions at several existing sites, including the site of the proposed Project, owned and operated by the applicant.
3. *Public Services*: the city is currently unable to maintain acceptable service ratios and objectives in regard to the provision of public services in the Koreatown area. This includes a lack of adequate recreation facilities and green space and, as noted in the MND, the nearby RFK Community of schools is projected to soon hit the designated overcrowded mark. The potential increase of population in this highly dense neighborhood would create even more strain on our already struggling infrastructure.
4. *Hazards and Hazardous Materials*: construction materials involved in such a large project, including significant increase in local CO2 levels caused but the construction process and the destruction of dozens of trees will lead to the emission of hazardous substances within ¼ mile of several existing schools which serve thousands of particularly vulnerable students; negative impacts to those education and occupational outcomes as a result of increased pollution will

result in significant rises in property and violent crimes and other long-term adverse social effects on the community at large¹.*

5. **Mandatory Findings of Significance:* in light of the dozens of development projects within the immediate area and greater WCKNC boundaries,
**Mandatory Findings of Significance:* by removing a proposed 43 trees the project will have environmental effects with substantial direct and indirect adverse effects on local residents this impact is compounded by Wilshire Center Koreatown's overall sparsity of trees with nearly 20% less tree canopy cover than neighboring areas,
6. *Sustainability Features:* despite the adoption of L.A.'s Green New Deal: Sustainability Plan (2019) the MND is based on antiquated Green Building standards which is particularly disturbing in an area which has been identified as suffering from a lack of significant environmental justice and neglect.

The appellants are not alone in their concerns; in addition to the members of WCKNC, more than 900 stakeholders have signed a petition opposing this project and CD 10's Herb Wesson have supported the appeals' request for a full EIR.

"Per Herb's directive, our office supported granting the appeals and conducting a full EIR on the project to deal with the historic, affordable housing, and traffic issues that come with this very large project, particularly since it's been nearly 20 years since the Wilshire Community Plan has been updated. This was expressed by Jamie at the PLUM meeting and our office did not support a continuance even though it was granted by the Committee."

Email communication dated December 9, 2020 from Andrew Westall,
Assistant Chief Deputy, CD 10

This board believes this project will have a profoundly negative impact on Wilshire-Center Koreatown's struggling economy, overburdened infrastructure, and locally affordable real estate stock. For example, the Normandie-Mariposa Historic Apartment District is the most frequently filmed location in the WCKNC boundaries and buildings in the area are often listed as some of the top architectural and historic landmarks in central Los Angeles. Thus, any threat to the integrity of this district will significantly impact the amount of revenue that the already strained entertainment, film, and tourist industries bring to our area.

The Wilshire Center Koreatown area is currently host to approximately a third of LA's new development including nearly half of all the city's Transit Oriented Community (TOC) projects, bringing in tens of millions of dollars in taxes and fees. Despite the extensive residential and commercial construction within Koreatown's boundaries, current residents have not benefited from an expansion in services or infrastructure. Funds garnished from this project have not been ear-marked for the creation of the previously promised park and approximately 30% of

¹ Lance Lochner, 'Education and Crime' in 'The Economics of Education.' (2020)
local families still lack adequate internet access. The inability of the area's infrastructure and green space to meet the needs of the current residents and the city's own standards alone warrants further consideration of the environmental impact of this project.

Additionally, increased housing stock alone is not a substantive argument for the lack of diligence on such an expansive project. The WCKNC, therefore, asks the PLUM committee to support the current appeals requesting an EIR for the development at 3440 Wilshire Blvd to ensure a transparent review process that thoroughly considers issues of environmental equity, health, and livability.

Furthermore, we oppose any further continuances requested on the part of the applicant who has ignored requests by both stakeholders and the council to meet and discuss concerns with this project. There have been five extensions and three continuances granted to the applicant since June, 2020.

An EIR gives the community the in-depth analysis a project of this scale deserves. The points raised by SAFER's experts over the MND compounded by [SEIU](#) and stakeholder concerns with respect to Jamison's reputation and current practices further underscore the need to better understand how this project would impact the community and our local ecosystem; the only way to meaningfully understand that is through an EIR.

Thank you for consideration in this matter.

Wilshire Center Koreatown Neighborhood Council

**Authorization to submit
Community Impact Statements
Board Resolution**

We, _____ (President Name) and
_____ (Officer Name), declare that we are the President
and _____, respectively of the _____ Neighborhood
Council (NC) and that on _____ (date adopted), a Brown Act noticed public meeting was
held by this NC with a quorum of _____ (number) board members present and that by a vote of
_____ (number) yes, _____ (number) no, and _____ (number) abstentions the
_____ NC adopted the following resolution:

Whereas, a Community Impact Statement is an official statement adopted by a Neighborhood Council
on issues pending before the City Council, its committees, or City commissions, Whereas, up to five
board members can be authorized through a board resolution to write and submit Community Impact
Statements through the City Clerk's online web system at <http://cityclerk.lacity.org/cis>.

Therefore, be it resolved, that the _____ Neighborhood Council
authorizes the following board member(s) to SUBMIT Community Impact Statements which have
been passed by a vote of the full board:

On the issue of CF# _____, we are

For

For if Amended

Against

Against if Amended

No Position (CF was discussed and acted upon, but the NC could not muster enough votes either
way)

Neutral Position (CF was discussed and NC decided to take no action at all)

Be it further resolved, in cases where an issue is moving quickly through the legislative process and a
promptly issued statement is beneficial, the aforementioned board members are authorized to also
WRITE and SUBMIT Community Impact Statements which express positions previously voted upon
by the full board.

IN WITNESS of the above action, the undersigned has executed and delivered this certificate in the
name and on behalf of the _____ (NC name) and as of the date set forth
below.

Signature of President

Signature of Board Officer

Print Name: _____

Print Name: _____

Date: _____

Date: _____