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- **“Initial Submissions”**: Compliant submissions received no later than by end of day Monday of the week prior to the meeting, which are not integrated by reference or exhibit in the Staff Report, will be appended at the end of the Staff Report. The Staff Report is linked to the case number on the specific meeting agenda.
- **“Secondary Submissions”**: Submissions received after the Initial Submission deadline up to 48-hours prior to the Commission meeting are contained in this file and bookmarked by the case number.
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SECONDARY SUBMISSIONS

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November 13, 2019

VIA U.S. MAIL AND E-MAIL

South Los Angeles Area Planning Commission
200 North Spring Street, Room 272
Los Angeles, CA 90012
Attn: Etta Armstrong, Commission Executive Assistant I

Re: 3650-3700 South Crenshaw Boulevard, 3450-3500 Obama Boulevard (DIR-2018-3204-SPR-SPP)

November 19th APC Hearing

Dear President Bates and Honorable Commissioners:

This firm represents District Square, LLC (the “Applicant”), which proposes to construct a 75-foot tall mixed-use project with approximately 648,157 square feet of floor area, including 577 dwelling units and 93,016 square feet of commercial uses (the “Project”), on an approximately 288,990-square foot vacant site located at 3650-3700 South Crenshaw Boulevard and 3450-3500 Obama Boulevard (the “Property”) in the City of Los Angeles (the “City”).

The Project is entirely consistent with the Crenshaw Corridor Specific Plan and the Los Angeles Municipal Code and was therefore approved by the Planning Department pursuant to Project Permit Compliance and Site Plan Review on June 28, 2019. The Applicant is not seeking any exceptions, adjustments, variances or zoning deviations of any kind. Moreover, the Project is not benefiting from any legally permitted development incentives or density bonuses under either the State Density Bonus Law or the City’s Transit Oriented Communities (TOC) Program. In fact, the proposed 577 units fall considerably below the allowable base density permitted by the underlying zoning (i.e., 722 units) and the maximum development potential under the TOC Program (i.e., 1,302 units).

As you know, the Project approvals were appealed and are currently pending before this Commission. To be clear, no affordable housing is required for this Project under either the Specific Plan or the LAMC. Moreover, as stated above, the Project is not benefiting from any development bonuses that trigger affordable housing obligations similar to other projects proposed in the vicinity. That said, the Applicant has voluntarily agreed to restrict 11 percent of the total Project units (or 63 units) for deed-restricted “Workforce Housing” at 150 percent of the Area Median Income (AMI) for a thirty-year covenant period. This volunteered commitment provides

South Los Angeles Area Planning Commission

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a community benefit by ensuring that rents for these 63 units will be fixed over an extended period of time.

The Project proposes a significant number of housing units that will assist the City to meet its housing production goals in the midst of a historic housing crisis driven largely by years of insufficient housing production. We sincerely hope that this Commission will embrace the Applicant's volunteered commitment to provide Workforce Housing as part of a larger effort to revitalize an underutilized vacant property with 577 total housing units, high quality neighborhood-serving uses, and publicly accessible open space. In addition, as you consider the appeals, we feel compelled to respectfully advise this Commission of the City's obligations and the Applicant's rights under the State Housing Accountability Act ("HAA" or the "Act").¹

The Act provides that, "[w]hen a proposed housing development project complies with applicable, objective general plan, zoning, and subdivision standards and criteria, including design review standards, in effect at the time that the housing development project's application is determined to be complete," the City may only disapprove the project under very limited circumstances.² In particular, to disapprove the project or to impose a condition that the project be developed at a lower density, the City must base its decision "upon written findings supported by a preponderance of the evidence on the record" that both of the following conditions exist:

- (1) The housing development project would have a specific, adverse impact upon the public health or safety unless the project is disapproved or approved upon the condition that the project be developed at a lower density (as used in this paragraph, a "specific, adverse impact" means a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete); *and*
- (2) There is no feasible method to satisfactorily mitigate or avoid the adverse impact identified pursuant to paragraph (1), other than the disapproval of the housing development project or the approval of the project upon the condition that it be developed at a lower density.³

The Project qualifies as a "housing development project" under the Act because it is a mixed-use development consisting of residential and nonresidential uses with at least two-thirds of the square footage designated for residential use.⁴ In addition, by approving Project Permit Compliance and Site Plan Review, the Department of City Planning has officially determined that

¹ California Government Code ("CGC") § 65589.5.

² *Id.* § 65589.5(j).

³ *Id.* § 65589.5(j)(1)(A) and (B).

⁴ *Id.* § 65589.5(h)(2)(B).

South Los Angeles Area Planning Commission
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the Project complies with the Crenshaw Corridor Specific Plan and all applicable, objective General Plan, Specific Plan, and zoning standards and criteria. The City has likewise determined that the Project is Statutorily Exempt from CEQA pursuant to California Public Resources Code Section 21155.4, as a mixed-use, transit-proximate development project consistent with a previously certified Specific Plan Environmental Impact Report (EIR).

Therefore, the law could not be clearer that, to grant the appeal(s) and disapprove the Project, this Commission is required to make the written findings set forth above supported by a preponderance of the evidence. However, there has been no evidence submitted into the record – much less a preponderance of the evidence – to suggest that the Project would have a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written standards, policies, or conditions, upon the public health or safety. In fact, there is no evidence in the record that the Project would have any public health or safety impacts at all. The appeals make only generic and vague assertions about gentrification and the approvals process – as opposed to quantifiable direct health or safety impacts – and therefore do not meet the heavy evidentiary burden to permit disapproval. Therefore, the findings necessary to disapprove the project or to impose a condition that the project be developed at a lower density cannot be made, and we respectfully submit that the HAA compels the Commission to approve the Project.

It bears mentioning that, in light of the State’s well-documented housing crisis, the State Legislature has repeatedly acted over the course of the last several years to strengthen the HAA. The Act provides, “It is the policy of the state that this section should be interpreted and implemented in a manner to afford the fullest possible weight to the interest of, and the approval and provision of, housing.”⁵ It also provides, “It is the intent of the Legislature that the conditions that would have a specific, adverse impact upon the public health and safety, as described in . . . paragraph (1) of subdivision (j), arise infrequently.”⁶

The Act provides for a private right of enforcement by the Applicant or a “housing organization.”⁷ If, in any action to enforce the Act, a court finds that the City disapproved a housing development project in violation of subdivision (j) of the Act, the court must issue an order or judgment compelling compliance with the Act within 60 days, including, but not limited to, an order that the City take action on the project.⁸ The court may issue an order or judgment

⁵ *Id.* § 65589.5(a)(2)(L).

⁶ *Id.* § 65589.5(a)(3).

⁷ Defined in the Act as “a trade or industry group whose local members are primarily engaged in the construction or management of housing units or a nonprofit organization whose mission includes providing or advocating for increased access to housing for low-income households and have filed written or oral comments with the local agency prior to action on the housing development project.” *Id.* § 65589.5(k)(2).

⁸ *Id.* § 65589.5(k)(1)(A).

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directing the City to approve the project if it finds that the City acted in bad faith when it disapproved or conditionally approved the project in violation of the Act, and will retain jurisdiction to ensure that its order or judgment is carried out.⁹ In addition, unlike most private rights of enforcement under State law, the Act provides that, except in extraordinary circumstances, the plaintiff will be awarded reasonable attorney's fees and costs.¹⁰

Furthermore, if the City fails to comply with the order or judgment compelling compliance with the Act within 60 days, the court must impose fines on the City in a minimum amount of ten thousand dollars (\$10,000) per housing unit in the housing development project, and may issue further orders to ensure compliance with the Act, including potential deemed approval of the project.¹¹ If the court finds that the local agency acted in "bad faith" (including, without limitation, taking an action that is "frivolous or otherwise entirely without merit") in disapproving or conditionally approving a housing development project, the fines shall be multiplied by a factor of five.¹²

As indicated by the policy statements in the Act, as well as its private right of enforcement and monetary penalty provisions, the State Legislature intends for the Act to have legal weight and ready enforceability. Notably, several cities across the state have recently faced litigation and liability under the Act. In 2017, the City of Berkeley settled a lawsuit filed by California Renters Legal Advocacy and Education Fund (CaRLA) and others with respect to a denied housing development project, approving the applicable zoning permit and paying up to \$44,000 in attorney fees. Other cities, including San Mateo, Los Altos, Sonoma, Lafayette, and Sausalito, have also faced Housing Accountability Act litigation from CaRLA and other nonprofit housing organizations, and the City of Dublin was forced to approve a 220-unit apartment building that it had previously denied. CaRLA has already submitted a letter to this Commission indicating its support for the Project and requesting that the Project approvals be upheld and the appeals denied pursuant to the Act—effectively putting the City on notice. (See attached letter from CaRLA, dated September 17, 2019.)¹³

⁹ *Id.*

¹⁰ *Id.*

¹¹ *Id.* § 65589.5(k)(1)(B)(i).

¹² *Id.* § 65589.5(l).

¹³ Other industry groups are also increasingly active in seeking to enforce the Act. On October 28, 2019, the California Association of Realtors, in its first-ever lawsuit under the Act, announced it was suing the City of Huntington Beach over its rejection of a 48-unit mixed-income condominium project.

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The “District Square” project is a textbook example of a project that meets the purposes and criteria of the Housing Accountability Act. It complies with all applicable zoning standards, would provide much-needed housing for the West Adams – Baldwin Hills – Leimert Community Plan Area and the City at large, and would not cause any adverse impacts to public health or safety. In addition to constructing 577 new homes, the Project will improve the walkability of this key intersection by providing abundant active, neighborhood-serving commercial uses and public open spaces. Rather than maximize density, the Project’s site plan prioritizes open spaces and livability—a substantial improvement over the barren, underutilized existing Property condition. As stated above, the Applicant has now volunteered to include 63 Workforce Housing units within the Project, which would be deed-restricted for a 30-year covenant period. For those reasons, we respectfully request on behalf of the Applicant that this Commission comply with State housing law by voting to deny the appeals and approve the Project.

We appreciate your time and consideration of this matter.

Very truly yours,



Dave Rand

cc: Terry Kaufmann Macias, City Attorney
Faisal Roble, Department of City Planning
Michelle Singh, Department of City Planning
Steve M. Garcia, Department of City Planning

EXHIBIT 1

California Renters Legal Advocacy and Education Fund

1260 Mission St
San Francisco, CA 94103
hi@carlaef.org



9/17/2019

South Los Angeles Area Planning Commission
1968 West Adams Boulevard, Meeting Room A
Los Angeles, CA 90018
Etta Armstrong, Commission Executive Assistant I, apcsouthla@lacity.org;
Eric D. Bates, President
Gail Willis, Vice President
Antoinette Anderson, Commissioner
Jaqueline Orozco, Commissioner
Stevie Stern, Commissioner

Via Email

Re: Crenshaw Boulevard/Obama Boulevard Mixed Use Project
Case No. DIR-2018-3204-SPR-SPP-1A

Dear Commissioners,

The California Renters Legal Advocacy and Education Fund (CaRLA) submits this letter to inform you that the South Los Angeles Area Planning Commission has an obligation to abide by all relevant state housing laws when evaluating the above captioned proposal, including the Housing Accountability Act.

California Government Code § 65589.5, the Housing Accountability Act, prohibits localities from denying housing development projects that are compliant with the locality's Zoning Ordinance and General Plan at the time the application was deemed complete, unless the locality can make findings that the proposed housing development would be a threat to public health and safety. The most relevant section is copied below:

(j) When a proposed housing development project complies with applicable, objective general plan and zoning standards and criteria, including design review standards, in effect at the time that the housing development project's application is determined to be complete, but the local agency proposes to disapprove the project or to approve it upon the condition that the project be developed at a lower density, the local agency shall base its decision regarding the proposed housing

development project upon written findings supported by substantial evidence on the record that both of the following conditions exist:

- (1) The housing development project would have a specific, adverse impact upon the public health or safety unless the project is disapproved or approved upon the condition that the project be developed at a lower density. As used in this paragraph, a "specific, adverse impact" means a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete.
- (2) There is no feasible method to satisfactorily mitigate or avoid the adverse impact identified pursuant to paragraph (1), other than the disapproval of the housing development project or the approval of the project upon the condition that it be developed at a lower density.

The Applicant proposes to construct a 577-unit, 5-story mixed use building on a 288,990 square foot site within the C2-2D-SP Zone within Subarea A of the Crenshaw Corridor Specific Plan, the South Los Angeles Alcohol Sales Specific Plan Area and the West Adams-Baldwin Hills-Leimert Community Plan area.

The above captioned proposal is zoning compliant and general plan compliant, therefore, your local agency must approve the application, or else make findings to the effect that the proposed project would have an adverse impact on public health and safety, as described above. The Planning Director determined that the project should be approved, and staff recommends that the Planning Director's determination be upheld and the appeal denied.

CaRLA is a 501(c)3 non-profit corporation whose mission is to restore a legal environment in which California builds housing equal to its needs, which we pursue through public impact litigation and providing educational programs to California city officials and their staff.

Sincerely,



Dylan Casey
Executive Director
California Renters Legal Advocacy and Education Fund

California Renters Legal Advocacy and Education Fund

1260 Mission St

San Francisco, CA 94103

hi@carlaef.org



9/17/2019

South Los Angeles Area Planning Commission
1968 West Adams Boulevard, Meeting Room A
Los Angeles, CA 90018

Etta Armstrong, Commission Executive Assistant I, apcsouthla@lacity.org;

Eric D. Bates, President

Gail Willis, Vice President

Antoinette Anderson, Commissioner

Jaqueline Orozco, Commissioner

Stevie Stern, Commissioner

Via Email

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The Applicant proposes to construct a 577-unit, 5-story mixed use building on a 288,990 square foot site within the C2-2D-SP Zone within Subarea A of the Crenshaw Corridor Specific Plan, the South Los Angeles Alcohol Sales Specific Plan Area and the West Adams-Baldwin Hills-Leimert Community Plan area.

The above captioned proposal is zoning compliant and general plan compliant, therefore, your local agency must approve the application, or else make findings to the effect that the proposed project would have an adverse impact on public health and safety, as described above. The Planning Director determined that the project should be approved, and staff recommends that the Planning Director's determination be upheld and the appeal denied.

CaRLA is a 501(c)3 non-profit corporation whose mission is to restore a legal environment in which California builds housing equal to its needs, which we pursue through public impact litigation and providing educational programs to California city officials and their staff.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dylan Casey', with a stylized, overlapping loop structure.

Dylan Casey
Executive Director
California Renters Legal Advocacy and Education Fund

California Renters Legal Advocacy and Education Fund - hi@carlaef.org

1260 Mission St, San Francisco, CA 94103



Planning APCSouthLA <apcsouthla@lacity.org>

Expanded comments of Crenshaw Subway Coalition on District Square

1 message

Damien Goodman <damienwg@gmail.com>

Tue, Sep 17, 2019 at 4:53 PM

Reply-To: damienwg@gmail.com

To: Steve Garcia <steve.m.garcia@lacity.org>, APCSouthLA@lacity.org

The following comments are additional remarks and statements of the Crenshaw Subway Coalition related to DIR-2018-3204-SPR-SPP-1A

Crenshaw Subway Coalition was never notified of this hearing despite being an appellant. Furthermore, the notice of the hearing online were not provided in a manner compliant with the Americans with Disabilities Act. Additionally there are two separate notices for this meeting

The approval is out of conformance with the General Plan because it fails to adequately considers the needs for additional infrastructure to serve the project including the public safety needs. Allowing a project of this size, density and scale without adequate infrastructure is incompatible with the General Plan.

There is no evidence in the record that the project will lead to a reduction of greenhouse gas emissions. The construction and the over 900 parking spaces

Planning Department request the Commission determine the project is Statutorily Exempt from CEQA in conformance with SB 743. However, making a determination in the absence of any actual stated policies and procedures for doing such is the very definition of arbitrary and capricious.

There is nothing in the record, and nothing within the public spear that specifies the process for residents in or adjacent to the specific plan are to provide notice and to review, let alone the general public. This is particularly troubling since the Regional Transportation Plan/Sustainable Communities Strategies "land use and growth strategies in the RTP/SCS will respect local input and advance smart growth initiatives."

Furthermore, by failing to provide notice of these processes and policies by which SB 743 is implemented, this entire proceeding violates our due process rights.

The project is part of a pattern and practice to displace the low-income and disproportionately Black and Brown residents of South Los Angeles and the Crenshaw District

To allow project to proceed in a low-income community of color of protected classes violates a number of environmental justice laws including Executive Order 12898.

The majority Black and Brown Crenshaw District is disproportionately harmed by toxins, and is actually in a cancer cluster. The project applicant has provided no plan for mitigating the harmful effects of construction

The record conveniently ignores that the project is located in a site determined by the City of Los Angeles Index of Displacement Pressure to have a high displacement risk and is in a community identified as one of the top neighborhoods undergoing change by the City of Los Angeles' Index of Neighborhood Change.

The project fails to comply with the SCAG RTP/SCS in many ways including but not limited to:

The RTP specifically says:

"[P]eople from low-income communities near new transit infrastructure may face displacement. Generally, displacement refers to a situation in which gentrification places pressure (through eviction or because of market forces) on people from existing communities to relocate to more affordable places. If those communities are priced out and move away from newly constructed transit facilities, those facilities lose the very people who are more likely to use them."

Pg. 75:

"Jurisdictions in the SCAG region should continue to be sensitive to the possibility of gentrification and work to employ strategies to mitigate its potential negative community impacts."

"In addition, local jurisdictions are encouraged to pursue the production of permanent affordable housing through deed restrictions or development by non-profit developers, which will ensure that some units will remain affordable to lower-income households."

On page 78 the first bullet point for advancing these objectives in an expanding population is: "affordable housing requirements"

LU1.1 address needs of diverse income groups:

LU2-1: strive to protect existing single-family and low density residential neighborhoods from encroachment by higher density residential and other incompatible users.

LU10-5 CF9-8: Minimize displacement

LU6-1 requires that the city strive to maintain neighborhood continuity by targeting new proposed affordable housing to serve existing residents and be designed to compliment established neighborhood character.

LU7-1: requires promoting “the preservation of existing assisted affordable and no-assisted housing stock and in particular rent-stabilized units...”

LU10-10 moderate income homeownership to “meet the demands of moderate income residents.”

LU 63-8 Housing Near Transit-Oriented Developments: "provide a range of housing types and housing that is affordable to all incomes along transit lines and within transit-oriented districts,”

No-Net-Loss Program to ensure that there “is no net loss of affordable housing units in a given geography, either through preservation of existing affordable housing or creation and product of new affordable housing.”

Planning director has not determined that the project complies with the Crenshaw Specific Plan Design manual, including but not limited to the project failing to meet the required setback standards.

The project has excessive signage that has not been reviewed and is out of conformance.

The record is absence any evidence that the provisions of the South Los Angeles Specific Plan for Alcohol use have been met. The project is in an area designated as high-crime by the LAPD.

Sincerely,
Damien Goodman
Crenshaw Subway Coalition



HERB J. WESSON, JR.
COUNCILMEMBER, 10TH DISTRICT
PRESIDENT, LOS ANGELES CITY COUNCIL

#6
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SEP 17 2019
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AREA PLANNING COMMISSION

FILE COPY

September 17, 2019

South Los Angeles Area Planning Commission
Department of City Planning
Los Angeles Department of Water and Power
Crenshaw Customer Service Center
4030 Crenshaw Boulevard
Los Angeles, CA 90008

RE: **SUPPORT OF APPEAL - DIR-2018-3204-SPR-SPP-1A**
3650-3700 S. CRENSHAW BOULEVARD; 3450-3500 OBAMA BOULEVARD

Dear Honorable Commissioners:

When the District Square project was first approved by our Los Angeles City Council, it was designed as a retail center bringing much needed amenities to the community. The community supported this development nearly unanimously in an effort to bring retail stores such as Target and Ralphs and much-needed commerce into our community. At that time, the CRA/LA was still in existence and this was exactly the type of project that the community, wanted, deserved, and expected. However, I am not comfortable with the current proposal and ask that you support the appeal and reject the project.


I cannot support what is currently being proposed. We voted as a Council for a development that would improve, not displace, the community. We have no need for a six-story development consisting of 577 luxury apartment units that will be unaffordable to most of the neighborhood's current residents. What we need is affordable housing. The median income in this area is about \$43,000. To build a development that does not take this into account is unacceptable. **There must be a significant number of affordable housing units in order for me to consider supporting this development.**

The original plan was designed to build up the area so that members in the community could use these local amenities, improve their everyday lives, and strengthen the economy of our neighborhoods. It is well known that owners of retail stores, particularly supermarkets, are less inclined to open new stores in our neighborhoods which need them most. That was why we were thrilled to be building a retail center on the corner of Obama and Crenshaw. We need to build developments in these areas that community members can enjoy and benefit from

economically while also bringing new people to the area, not developments that will push existing tenants out. Bringing in 577 market rate luxury residential units does not build up or benefit the community. Instead, it will drive up rent prices and displace life-long community members.

We are going to continue to face this problem with the increasing number of residential developments sprouting up across the city. To mitigate the damage to our communities and neighborhoods throughout Los Angeles that these projects will cause, I will be introducing a motion to create a policy to implement anti-displacement zones near luxury developments like this. This policy would cap rent prices within a two-mile radius of these kinds of projects and protect renters in the surrounding area of a luxury development from predatory rent-hikes. While we can protect our neighborhoods in the future with this policy, for now I urge you to listen to our community members, support the appeal, and reject the current plan.

With the utmost respect,



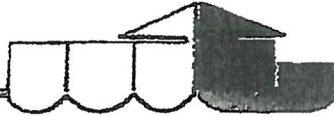
HERB J. WESSON, JR.
President, Los Angeles City Council
Councilmember, 10th District

HJW:sg:mt:ajw:sl

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CITY OF LOS ANGELES

SEP 17 2019



CITY PLANNING DEPT.

AREA PLANNING COMMISSION

10th COUNCIL DISTRICT WOMEN'S STEERING COMMITTEE

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September 16, 2019

Ms. Etta Armstrong, Commission Executive Assistant I
Los Angeles Department of City Planning (LADCP)
Office of the South Los Angeles Area Planning Commission (APC)
200 N. Spring Street, Room 272
Los Angeles, CA 90012

Gail Willis
Vice President

Attn: Messrs. Faisal Robles (Principal Planner); Alan Como (Unit Head) & Steve M. Garcia (Planning Associate) Crenshaw Corridor Specific Plan Project Planners

Re: DIR-2018-3204-SPR-SPP (3650-3700 S. Crenshaw Boulevard)

item # 6

Dear Ms. Armstrong:

The 10th Council District Women's Steering Committee (10th Council District W.S.C.) was established in October of 1973 by the late Councilman David Cunningham, Jr., and his then Chief of Staff, now Congresswoman, Maxine Waters. Our core mission is to promote education, encourage entrepreneurship, civic engagement and political involvement that improve the quality of life for all of our citizens in general, but specifically in the 10th Council District.

With that in mind, I'm writing this letter in support of the above noted compliance and site plan review of the proposed mixed-use development at the historic intersection of Obama Boulevard and Crenshaw Boulevard, which will bring much needed retail, entertainment and employment opportunities to our community.

The redevelopment of the former Boys Market-Ralphs Grocery Store/Thrifty Drug Store-Rite Aid/Comet-Rocket Cleaners property is an important transformation of a site that was rebuilt after being significantly damaged during the 1992 Civil Unrest.

Unfortunately, by 2010, the center lost some of its luster, and yes, some of its tenants, as the Crenshaw Baldwin Hills Mall completed its renovations.

Excitedly though, the proposed development of housing and commercial/retail along a designated transit corridor, the Metro Crenshaw/LAX line, will bring well needed jobs and economic benefits to our community, and serve as a public center for entertainment and cultural/social events.

Hence, I reiterate the 10th Council District W.S.C.'s full support of the Director's Determination that the project is in compliance with the Crenshaw Corridor Specific Plan and Site Plan Review Findings that the project is in substantial conformance with the purpose, intent and provisions of the subject General Plan and community plan.

Please feel free contact me if you have any questions regarding this matter.

Sincerely,

Jacqueline Nunn
Jacqueline Nunn

10th Council District W.S.C.

President/CEO

323.735.0879 or 323.371.1071

www.10thcdwsc.org



GLAAACC

Greater Los Angeles
African American
Chamber of Commerce

501(C) 6 Board Members

Board Members

Gene Hale, *Chairman*
Jamarah Hayner, *Co-Chair*
Angela Gibson, *President*
Abdi Ahmed, *Vice President*
Ronald A. Lowe, *Secretary*
Lily Otieno, *Treasurer*

Directors

Kelli Bernard
Tene C. Bonds
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Donovan Green
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Clifton Johnson
Chidi Ofoma
Theodora Oyie
Byron K. Reed
Odest T. Riley Jr.

September 12, 2019

Ms. Etta Armstrong
Commission Executive Assistant I
Los Angeles Department of City Planning (LADCP)
Office of the South Los Angeles Area Planning Commission (APC)
200 N. Spring Street, Room 272
Mail Stop 395
Los Angeles, CA 90012

Attn: Messrs. Steve M. Garcia (Planning Associate) & Alan Como (Unit Head)

Crenshaw Corridor Specific Plan Project Planners

Re: District Square: DIR-2018-3204-SPR-SPP (3650-3700 S. Crenshaw Boulevard)

Dear Ms. Armstrong:

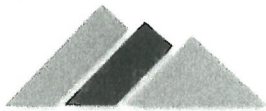
The Greater Los Angeles African American Chamber of Commerce (henceforth referred to as "GLAAACC") has represented the African-American business for more than twenty-eight (28) years.

Our mission is to advocate and promote the growth and development of the African American business community throughout the greater Los Angeles area, as well as nationally and internationally. We do this by focusing on legislative advocacy, identifying and developing business opportunities, new trends and markets, while forging key strategic business alliances.

Additionally, GLAAACC looks to provide an environment that fosters the growth of African American businesses domestically and internationally, by providing information/assistance to business owners/operators relative to access to capital. Furthermore, GLAAACC fosters a networking environment that helps create public policies leading to more favorable outcomes for African American businesses. GLAAACC fully understands the possibilities of the above referenced development and the synergy it will provide to the community. We look forward to serving as a resource to both the developer and future tenants of the District Square project.

With respect to the proposed development at the intersections of Crenshaw Boulevard and Obama Boulevard (formerly known as Rodeo Road), its completion will greatly boost GLAAACC's stated goals of bringing long needed retail, entertainment and employment opportunities

item # 6



GLAAACC

**Greater Los Angeles
African American
Chamber of Commerce**

501(C) 6 Board Members

Board Members

Gene Hale, *Chairman*
Jamarah Hayner, *Co-Chair*
Angela Gibson, *President*
Abdi Ahmed, *Vice President*
Ronald A. Lowe, *Secretary*
Lily Otieno, *Treasurer*

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Kelli Bernard
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Timothy Coffey
Nicole Enearu
Donovan Green
Anthony Holland
Clifton Johnson
Chidi Ofoma
Theodora Oyie
Byron K. Reed
Odest T. Riley Jr.

to our community. In addition, the project will provide our members and community business owners at large, with opportunities to seek commercial and retail business with potential tenants as service providers and vendors.

Moreover, the design of District Square is important as a much needed "gathering place" with a diverse retail mix for residents and visitors, especially as it relates to the iconic renaming of Rodeo Road to Obama Boulevard. These are key issues that GLAAACC has embarked on with respect to empowering our community with the goal of making the Crenshaw District a valuable and desired destination spot. With the right blend of businesses and services, this area can become "The Grove South."

Furthermore, with Los Angeles preparing to host the 2028 Olympics, it is vitally important that our community, and more specifically the Crenshaw Corridor, fully participate in and reap the anticipated financial benefits - in a meaningful way - that will undoubtedly result from this month-long international event.

It is for these reasons the Greater Los Angeles African American Chamber of Commerce fully supports this project and request that the South Los Angeles Area Planning Commission deny the appeal submitted by the appellant of record.

Thank you for your time and consideration in this matter.

Sincerely,

Gene Hale
Chairman



Item # 6

BOARD OF DIRECTORS

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Wells Fargo Bank

September 04, 2019

Ms. Etta Armstrong, Commission Executive Assistant I
Los Angeles Department of City Planning (LADCP)
Office of the South Los Angeles Area Planning Commission (APC)
200 N. Spring Street, Room 272
Mail Stop 395
Los Angeles, CA 90012

Attn: Messrs. Faisal Robles (**Principal Planner**); Alan Como (**Unit Head**) & Steve M. Garcia (**Planning Associate**) Crenshaw Corridor Specific Plan Project Planners

Re: DIR-2018-3204-SPR-SPP (**District Square - 3650-3700 S. Crenshaw Boulevard**)

Dear Ms. Armstrong:

On behalf of The Black Business Association (BBA), the oldest active ethnic business organization in the State of California, headquartered in the City of Los Angeles, this letter is written in support of the redevelopment of the southeast corner of Crenshaw Boulevard, and recently renamed Obama Boulevard, formally Rodeo Road.

The mission of the BBA is to ensure that the African-Americans and other diverse business owners benefit from our advocacy efforts to impact, improve and implement policies that improve access to contracting, procurement and entrepreneurial opportunities with the public and private sector, in addition to providing access to financial resources.

The proposed District Square project will be a welcome economic boost to our community, as well as a signature catalytic development, adding to the much anticipated opening of the Metro Crenshaw/LAX line in 2020, serving the Crenshaw District, Inglewood, Westchester and surrounding areas, in time for the opening of the new NFL Stadium in the City of Inglewood, which will host a Superbowl in 2022, and the Los Angeles Olympic Games in 2028.

This project is a prime example of what our mission seeks to accomplish relative to providing business opportunities to minority contractors and business owners. The BBA remains totally committed to economic development, revitalization, and creating sustainable—as in 'long lasting'—jobs in Los Angeles, and more specifically in this instance, the Crenshaw Community.

It is for the reasons stated herein that the BBA fully supports the above referenced approved entitlements, and request that the South Los Angeles Area Planning Commission deny the appeal submitted by the appellant of record.

Sincerely,

Earl "Skip" Cooper, Jr.
President/Executive Director

C: Office of Council District 10

AFFILIATE ORGANIZATIONS

Black Women's Network

California Black
Chamber of Commerce

California Council of Black
Chamber

Entrepreneur Educational
Center, Inc.

National Black
Business Council

The Greenlining Institute

The National Association
of African American
Chambers of Commerce

The National Black
Chamber of Commerce

Pan African Film & Arts
Festival

Recycling Black Dollars

The U.S. Black Chamber
Of Commerce

Zambia-USA Chamber of
Commerce

MEMORANDA OF UNDERSTANDING

Los Angeles Minority
Business Opportunity
Committee

Southwest Los Angeles
County Small Business
Development Center

U.S. Small Business
Administration
Los Angeles District Office

Southland Business
Development Partnership

The Urban Leadership Project

USC Business
Expansion Network

Valley Economic
Development Corporation

The Black Business Association

Mailing Address: P.O. Box 43159, Los Angeles, CA 90043

Tel: (323) 291-9334 • Fax: (323) 291-7820 • Website: www.bbala.org • E-mail: mail@bbala.org



THE CRENSHAW CHAMBER OF COMMERCE

*Empowering Business and Promoting Commerce through
Electronic Economic Development Since 1933*



Armen D. Ross
President/CEO

Board of Directors

Armen D. Ross
President
The Ross Group

Gary Kynard
Executive V.P.
Endsure.com

Connie Thomas
V.P. Of Membership
*Employment Development
Department*

Daniel Leathers
VP of Operations & Finance
US Bank

Donna Grayson
V.P. Of Non-Profit
Grayson's Outreach

Janet Mendez
Executive Assistant
*Crenshaw Chamber of
Commerce*

item #6

August 14, 2019

Ms. Etta Armstrong, Commission Executive Assistant I
Los Angeles Department of City Planning (LADCP)
Office of the South Los Angeles Area Planning Commission (APC)
200 N. Spring Street, Room 272
Mail Stop 395
Los Angeles, CA 90012

Attn: Messrs. Faisal Robles (**Principal Planner**); Alan Como (**Unit Head**) & Steve M. Garcia (**Planning Associate**) Crenshaw Corridor Specific Plan Project Planners

Re: DIR-2018-3204-SPR-SPP (**3650-3700 S. Crenshaw Boulevard**)

Dear Ms. Armstrong:

The Crenshaw Chamber of Commerce ("**The Chamber**") was established in 1933, and for more than eighty (80) years, has represented the business and commercial interests along the Crenshaw Boulevard corridor; bounded by Washington Boulevard on the north, Western Avenue on the east, La Cienega Boulevard on the west and Florence Avenue on the south.

The Chamber's mission is not only to support these businesses, but also the residents of the area by advocating for employment, entrepreneurial and investment opportunities in our community. Equally as important to our core mission, is ensuring that our community has the same selections of retail, entertainment, and cultural amenities that most communities take for granted.

The proposed development at the intersection of the recently renamed Obama Boulevard, and Crenshaw Boulevard, will bring much needed retail, entertainment and employment opportunities to our community. In addition, the project will provide our members and community business owners with an opportunity to seek contracting and vending services with many of the commercial and retail businesses anticipated to come into the commercial/retail/housing project, specifically replacing the Ralph's Grocery Store with a new full-service grocery store.



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Grayson's Outreach

Janet Mendez
Executive Assistant
*Crenshaw Chamber of
Commerce*

Moreover, the design of District Square is important in another measure in that it will bring a much needed "gathering place", including a community room to the Crenshaw District for residents and visitors, especially as it relates to the iconic renaming of Rodeo Road to Obama Boulevard, which certainly will become a cultural destination attraction.

The aforementioned are key issues the Chamber has embarked on with respect to empowering our community, with the goal of making the Crenshaw District equal to any other in our fair city.

With that in mind, and with Los Angeles preparing to host the 2028 Olympics, it is important that our community, and more specifically the Crenshaw Corridor, is able to fully participate in, and reap the anticipated financial benefits in a meaningful way, that undoubtedly will come from this month-long international event.

More pointily however, as it relates to the subject project's "Findings" of compliance with provisions of the Crenshaw Corridor Specific Plan (SP) & Site Plan Review (SPR), per planning staff, the project meets provisions of the SP/SPR with respect to the proper location of a proposed mixed-use development, along a major thoroughfare, adjacent to MTA Rail Stations, and in the C2-2D-SP zone relative to Subarea A, which permits a FAR of 3:1 in same (**approved project has an FAR of 2.24:1**). Further, the project either meets or exceeds other SP provisions, including, height/transitional height, landscape/open space, parking (**residential/Commercial/bicycle with a Transit Oriented Development [TOD] area**) requirements, color/materials and transparency elements.

Hence, the application is not a request to deviate from the zoning code to increase the FAR/Density/Height nor reduced setbacks, but only a compliance review of the SP and Site Plan Review (SPR) requirements, basically a "by right project", and therefore, does not require an affordable housing component.

It is important to note that the Specific Plan was initially adopted in 2004, amended in 2017, and undoubtedly, the Los Angeles Department of City Planning (LADCP) and other interested parties conducted extensive outreach to the community, and the approved plan certainly reflects their input, including the density and height.

The appellant, in the submitted appeal failed to demonstrate instances where the decision maker erred in finding the project in compliance with the subject specific plan, or, over reached with respect to approving the Site Plan Review (SPR).



THE CRENSHAW CHAMBER OF COMMERCE

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Electronic Economic Development Since 1933*



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President/CEO

Board of Directors

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V.P. Of Non-Profit
Grayson's Outreach

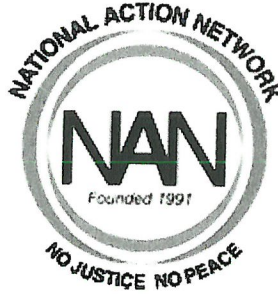
Janet Mendez
Executive Assistant
*Crenshaw Chamber of
Commerce*

It is for the reasons stated herein that the Crenshaw Chamber of Commerce fully supports the above referenced approved entitlements, and request that the South Los Angeles Area Planning Commission deny the appeal submitted by the appellant of record.

Sincerely,

Armen D. Ross
President

C: Office of Council District 10



August 29, 2019

Ms. Etta Armstrong, Commission Executive Assistant I
Los Angeles Department of City Planning (LADCP)
Office of the South Los Angeles Area Planning Commission (APC)
200 N. Spring Street, Room 272
Mail Stop 395
Los Angeles, CA 90012

Attn: Messrs. Faisal Robles (Principal Planner); Alan Como (Unit Head) & Steve M. Garcia (Planning Associate) Crenshaw Corridor Specific Plan Project Planners

Re: DIR-2018-3204-SPR-SPP (3650-3700 S. Crenshaw Boulevard)

item # 6

Dear Ms. Armstrong:

National Action Network (NAN/www.nationalactionnetwork.net) is one of the leading civil rights and social justice organizations in the Nation, with a regional chapter here in the Los Angeles area. The local chapter is active on issues that improve the quality of life for all citizens with respect to economic empowerment, corporate responsibility and social equity.

With that in mind, I'm writing this letter in support of the above noted compliance and site plan review of the proposed mixed-use development at the historic intersection of Obama Boulevard and Crenshaw Boulevard, which will bring much needed retail, entertainment and employment opportunities to our community.

The project will provide members of our organization, and community business owners at large, an opportunity to seek contracting and vending services with many of the commercial and retail businesses anticipated to come into the mixed-use project; and, equally as important, replace the demolished Ralphs Grocery Store with a new full service grocery store, which is greatly needed in the community.

National Action Network Los Angeles
2828 W. Jefferson Blvd.
Los Angeles, CA 90018
323.521.3477

As designed, District Square will bring much needed housing, along with desired commercial/retail to our community, and in doing so, provide a much needed "gathering place", including a community room, where area residents and visitors can "meet and mingle", especially as it relates to the iconic renaming to Rodeo Road to Obama Boulevard, which certainly will become a cultural destination attraction.

To put a fine point on my previous statement, I would be remiss if I didn't mention that the City of Los Angeles is preparing to host the 2028 Olympics, and that it is important that our community, and more specifically the Crenshaw Corridor, is able to fully participate in, and reap the anticipated financial benefits in a meaningful way, that undoubtedly will come from this month-long international event. Clearly, the District Square project will play a vital role in ensuring its success.

Hence, it is for the reasons stated herein that National Action Network fully supports the above referenced approved Project Permit Compliance and Site Plan Review applications, and request that the South Los Angeles Area Planning Commission deny the appeal submitted by the appellant of record.

Please feel free to contact me if you have any questions regarding this matter.

Sincerely,

Rev. Jonathan Moseley

National Action Network Los Angeles
President/Western Regional Director

National Action Network Los Angeles
2828 W. Jefferson Blvd.
Los Angeles, CA 90018
323.521.3477



The African American Restaurant
& Hospitality Association of Greater Los Angeles

Nathan Freeman
President
Vice Chair – Board of Directors

James B. Davis
Youth Outreach Coordinator
Member – Board of Directors

Stephanie Freeman
Secretary & National Franchisee Coordinator
Member – Board of Directors

Jamie Parker
Member – Board of Directors

Casey Parker
Vice President
Chair – Board of Directors

Kristina Hintzen
Director of Sustainability Initiatives
Member – Board of Directors

Rick “Dante” Charleston
Governmental Relations
Member – Board of Directors

Mychal Scott
Director of Social Media

September 15, 2019
Ms. Etta Armstrong
Commission Executive Assistant I
Los Angeles Department of City Planning (LADCP)
Office of the South Los Angeles Area Planning Commission (APC)
200 N. Spring Street, Room 272
Mail Stop 395
Los Angeles, CA 90012

Attn: Messrs. Faisal Robles (**Principal Planner**); Alan Como (**Unit Head**) & Steve M. Garcia (**Planning Associate**) Crenshaw Corridor Specific Plan Project Planners

Re: DIR-2018-3204-SPR-SPP (3650-3700 S. Crenshaw Boulevard)

item #6

Dear Ms. Armstrong:

On behalf of the African-American Restaurant & Hospitality Association of Greater Los Angeles (TAARHAGRLA), I'm writing today in support of the District Square Project (“The Project”).

The African-American Restaurant & Hospitality Association of Greater Los Angeles was established to promote, advocate, support and educate the hundreds of African-American and immigrants of African/Caribbean descent in the rapidly growing food and hospitality industry in the greater Los Angeles area.

With the focus on education, business expansion, outreach and marketing, TAARHAGRLA provides its members with cutting edge demographic information, state-of-the-art training programs in the culinary arts and best management practices, designed to help them compete in an ever changing industry.

Equally as important for TAARHAGRLA, is its mission to increase the number African-American owned and operated restaurants, food establishments and lodging businesses.

The District Square project as envisioned and designed, will celebrate the rich cultural diversity of the greater Crenshaw District community by encompassing its past (**Maverick's Flat, Total Experience and Freddie Jett's Pipe Piper**), while creating new and shared experiences in today's ever changing and diverse "City of Angels".

At the heart of The Project is *The Outdoor Living Room*. It will be a central outdoor courtyard space connecting the residential and commercial/retail portion of the project, integrating nicely into the existing neighborhood. From intimate nooks to dynamic public spaces, this will become a new favorite destination for locals and visitors alike to meet friends, share a moment or retreat from the hustle and bustle of the city.

With that in mind, I'm writing this letter in support of the above noted compliance and site plan review of the proposed mixed-use development at the historic intersection of Obama Boulevard and Crenshaw Boulevard, which will bring much needed retail, entertainment and employment opportunities to our community.

The African-American Restaurant & Hospitality Association of Greater Los Angeles looks forward to working with the property owner to ensure that the eateries and other retail entities reflect the rich cultural history and diversity of the greater Los Angeles area in general and the Crenshaw District in particular. The Project will be a welcome and much-needed addition to the community, its residents and visitors.

Sincerely,

A handwritten signature in cursive script that reads "Casey Parker". The signature is fluid and stylized, with the first and last names being clearly legible.

Casey Parker, VP
TAARHAGRLA

U.S. WOMEN'S COUNSEL

22817 Ventura Blvd.
Woodland Hills, CA 91364

September 12, 2019

Ms. Etta Armstrong, Commission Executive Assistant I
Los Angeles Department of City Planning (LADCP)
Office of the South Los Angeles Area Planning Commission (APC)
200 N. Spring Street, Room 272
Mail Stop 395
Los Angeles, CA 90012

Attn: Messrs. Faisal Robles (**Principal Planner**); Alan Como (**Unit Head**) & Steve M. Garcia (**Planning Associate**) Crenshaw Corridor Specific Plan Project Planners

Re: DIR-2018-3204-SPR-SPP (3650-3700 S. Crenshaw Boulevard)

item # 6

Dear Ms. Armstrong:

The U.S. Women's Counsel was established in 2018 by a politically and civic minded group of women of color to promote education, entrepreneurial opportunities, civic engagement and political involvement that improve the quality of life for all of our citizens in general, but specifically in South Los Angeles and surrounding areas.

With that in mind, I'm writing this letter in support of the above noted compliance and site plan review of the proposed mixed-use development at the historic intersection of Obama Boulevard and Crenshaw Boulevard, which will bring much needed retail, entertainment and employment opportunities to our community.

The redevelopment of the former Boys Market-Ralphs Grocery Store/Thrifty Drug Store-Rite Aid/Comet-Rocket Cleaners property is an important transformation of a site that was rebuilt after being significantly damaged during the 1992 Civil Unrest.


Unfortunately, by 2010, the center loss some of its luster, and yes, some of its tenants, as the Crenshaw Baldwin Hills Mall completed its renovations.

Excitedly though, the proposed development of housing and commercial/retail along a designated transit corridor, the Metro Crenshaw/LAX line, will bring well need jobs and economic benefits to our community, and serve as a public center for entertainment and cultural/social events.

Hence, I reiterate U.S. Women's Counsel's full support of the Director's Determination that the project is in compliance with the Crenshaw Corridor Specific Plan and Site Plan Review Findings, that the project is in substantial conformance with the purpose, intent and provisions of the subject General Plan and community plan.

Please feel free contact me if you have any questions regarding this matter.

Sincerely,


Kathy Smith
U.S. Women's Counsel

DAY OF HEARING SUBMISSIONS