

# **Appendices**

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# **Appendix FEIR-1**

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Draft EIR Comment Letters

**DEPARTMENT OF TRANSPORTATION**

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*Making Conservation  
a California Way of Life*

May 11, 2022

Jason McCrea  
Major Projects Section  
City of Los Angeles, Department of City Planning  
221 N. Figueroa Street Suite 1350  
Los Angeles, CA 90012

RE: District NoHo Project  
SCH # 2020060573  
Vic. LA-170/PM R15.66  
GTS # LA-2020-03905-DEIR

Dear Jason McCrea:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced environmental document. The Project proposes a transit-oriented development on approximately 15.9 acres of land owned by the Los Angeles County Metropolitan Transportation Authority (Metro) at and including the terminus of Metro's B (Red) Line and G (Orange) Line (Project Site) as part of a joint development effort with Metro. The Project would include improvements to transit facilities and include approximately 1,523,528 square feet of residential uses comprised of 1,216 market rate units and 311 affordable residential units, up to 105,125 new square feet of retail/restaurant uses, and up to 580,374 new square feet of office space. The proposed uses would be located within several buildings on multiple "Blocks" ranging in height from one to 28 stories. Additionally, certain surplus City right-of-way are proposed to be merged into the Project Site which, if approved, would bring the total lot area to 16.07 acres. Overall, the Project would build a net increase of 2,158,191 square feet of floor area within the Project Site.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. You may reference the Governor's Office of Planning and Research (OPR) for more information:

<http://opr.ca.gov/ceqa/updates/guidelines/>

As a reminder, VMT is the standard transportation analysis metric in CEQA for land use projects after July 1, 2020, which is the statewide implementation date.

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, all future developments should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing. Overall, the environmental report should ensure all modes are served well by planning and development activities. This includes reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions.

For this project, we encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). This reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

You can also refer to the 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), which is available online at:

<http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

### **VMT Analysis**

The TAG identifies a daily household VMT per capita impact criteria of 9.4 and daily work VMT per employee impact criteria of 11.6 for the South Valley APC, in which the Project is located. All analysis scenarios residential VMT per capita is between 4.0 to 6.1. All

analysis scenario Work VMT per employee is between 8.7 to 10.4. Therefore, the residential and office uses would not result in a significant VMT impact. To validate this statement, we recommend the City to prepare post-development VMT analysis with all necessary mitigation measures. Mitigation measure should be implemented when the post-development VMT analysis discloses any traffic significant impact.

### **Freeway Safety Analysis**

For freeway safety analysis, none of the queues would exceed the ramp storage length during either peak hour. Therefore, further evaluation of the significance criteria is not necessary at any location. The Project would not result in a significant impact, and no mitigation measures are required based on Phase 1 or Full Buildout Project traffic.

### **Transit**

The Project would design and construct the Consolidated Transit Center to integrate bus and rail services at one purpose-built location. The Project would also construct new Metro parking to replace the existing supply removed from Parcel 1.

### **Pedestrian**

The Project would install or upgrade pedestrian infrastructure at several locations. All public sidewalks adjacent of the Project Site would be widened where necessary to meet or exceed the width standards from Mobility Plan 2035. The Project would repaint existing crosswalks that would be affected by Project changes to curbs and would install new crosswalks at the following locations:

- Across the south leg of Tujunga Avenue & Chandler Boulevard (North)
- Across the north leg of Tujunga Avenue & Chandler Boulevard (South)
- Across the south leg of Lankershim Boulevard & Chandler Boulevard (North)
- Across the west leg of District Way & Fair Avenue

Per the Project Design Feature TF-PDF-2, the project proposes pedestrian network and traffic calming improvements. The project proposes installing new continental-style crosswalks to increase visibility and safety. It is recommended that all intersections within the project area be upgraded to continental striping. Additionally, ensure that all curb ramps within the project are upgraded with detectible warning surfaces to comply with ADA requirements.

At intersections where incidences of collisions are high and street crossing distance increased, it is recommended that Leading Pedestrian Intervals (LPIs) be included to allow pedestrians the opportunity to enter a signalized crosswalk prior to vehicles.

As much of the project falls within Pedestrian Enhanced Districts (per LA's Mobility Plan 2035), pedestrian safety should be prioritized.

## **Bicycle**

The Project proposes to install a new two-way bicycle route through the Project Site on District Way. It would also improve the westbound bicycle lane on Chandler Boulevard (North) between Tujunga Avenue and Lankershim Boulevard to a Class IV facility separated by bollards and would install a bicycle crossing signal across Lankershim Boulevard at Chandler Boulevard (North). The Project would install a new two-way Class IV facility separated by Bollards on the east side of Fair Avenue between District Way and Chandler Boulevard. The Project would provide bicycle parking at each block along with parking for Metro Bike Hubs and Metro's Bikeshare or similar first mile/last mile transit options.

Per the Project Design Feature TF-PDF-2, the project proposes a series of on-street bicycle improvements, including signalized bicycle crossings, and Class IV bicycle lanes. Where any existing or proposed Class II/IV facilities exist, green zone conflict striping should be included at any controlled intersection, per NACTO guidelines.

On streets designated as 'bicycle-friendly roads' on Google Maps, consideration should be given to designation these streets (Tujunga Ave, Cumpston St, Lankershim Blvd) as Class-III bike facilities, with sharrows included.

For all improvements recommended above, please include all applicable bicycle signage, per MUTCD standards.

## **TDM Program**

The Project would incorporate various measures to encourage alternative transportation and reduce VMT and vehicle trips, including:

- Reduced parking supply
- Promotions and marketing
- Pedestrian network improvements
- Traffic calming improvements
- Implement on-street bicycle facilities
- Bicycle parking per LAMC

## **Other**

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

Please be reminded that protected-permissive left-turn signal phasing improvement performed within the State Right-of-way at the westbound left turn from Magnolia Boulevard to SR-170 southbound will require an Encroachment Permit from Caltrans.

Jason McCrea  
May 11, 2022  
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Any modifications to State facilities must meet all mandatory design standard and specifications.

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2020-03905-DEIR.

Sincerely,



MIYA EDMONSON  
LDR/CEQA Branch Chief

email: State Clearinghouse

**CITY OF LOS ANGELES**  
INTER-DEPARTMENTAL CORRESPONDENCE

**DATE:** April 27, 2022

**TO:** Vincent P. Bertoni, Director of Planning  
Department of City Planning

**Attn:** Jason McCrea, City Planner  
Department of City Planning

**FROM:** Ali Poosti, Interim Division Manager  
Wastewater Engineering Services Division  
LA Sanitation and Environment

  
Ryan Thiha (for)

**SUBJECT: DISTRICT NOHO PROJECT - NOTICE OF COMPLETION AND AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT**

This is in response to your April 7, 2022 Notice of Completion and Availability of Draft Environmental Impact Report for the proposed mixed-use project located at 11100, 11264-11280, 11320, 11163-11347, and 11440 Chandler Boulevard; 11204-11270 Cumpston Street; 5300-5320 Bakman Avenue; and 5311-5373 and 5340-5356 Lankershim Boulevard, Los Angeles, CA 91601. LA Sanitation, Wastewater Engineering Services Division has received and logged the notification. Upon review, there were no changes to the project and the previous response is valid. Please notify our office in the instance that additional environmental review is necessary for this project.

If you have any questions, please call Christopher DeMonbrun at (323) 342-1567 or email at [chris.demonbrun@lacity.org](mailto:chris.demonbrun@lacity.org)

AP/CD: sa

c: Julie Allen, LASAN  
Michael Scaduto, LASAN  
Christine Sotelo, LASAN  
Christopher DeMonbrun, LASAN





Jason McCrea &lt;jason.mccrea@lacity.org&gt;

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## Earthjustice Comments on DEIR for NoHo Project

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**Matt Vespa** <mvespa@earthjustice.org>  
To: jason.mccrea@lacity.org

Mon, May 23, 2022 at 9:48 AM

Mr. McCrea –

Attached please find comments on the Draft EIR for the District NoHo Project. As set forth in these comments, the Draft EIR violates CEQA for failing to require all-electric buildings to mitigate the significant greenhouse gas, energy, and public health impacts of mixed-fuel buildings. If you are interested, I would appreciate the opportunity to discuss our concerns further.

Please put me on the notification list for further updates on the NoHo Project.

Thank you

Matt

Matthew Vespa

(he/him)

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**Earthjustice DEIR Comments on NoHo Project 05 23 22.pdf**  
274K



*Via electronic mail*

May 23, 2022

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City of Los Angeles, Department of City Planning  
221 N. Figueroa Street, Suite 1350  
Los Angeles, CA 90012  
[jason.mccrea@lacity.org](mailto:jason.mccrea@lacity.org)

**Re: Earthjustice Comments on Draft EIR for District NoHo Project**

Dear Mr. McCrea:

Earthjustice appreciates the opportunity to comment on the Draft Environmental Impact Report (“DEIR”) for the District NoHo Project (“NoHo Project”). Our comments focus on the NoHo Project’s failure to avoid long-term commitments to fossil fuel dependency by requiring all-electric buildings. As the DEIR acknowledges, by relying on polluting gas appliances in Project buildings rather than efficient electric alternatives, the NoHo Project would result in an over 35 million cubic feet (“cf”) increase in gas demand per year.<sup>1</sup> By locking in new sources of gas demand for decades, the Project will result in significant greenhouse gas (“GHG”), energy, and public health impacts, which the DEIR fails to adequately acknowledge and mitigate. Absent a requirement for all-electric construction, the DEIR violates the California Environmental Quality Act (“CEQA”).

All-electric construction is feasible mitigation for the NoHo Project’s significant greenhouse gas, energy, and public health impacts. For example, in a recent settlement after its failure to properly mitigate its greenhouse gas impacts under CEQA, Tejon Ranch, a planned development consisting of over 35,000 housing units, agreed to conditions that included all-electric new construction.<sup>2</sup> Notably, all-electric new construction is typically less expensive than mixed-fuel construction due to avoided costs of gas lines and is increasingly being adopted throughout Southern California. Moreover, for affordable single- and multi-family housing, the Building Initiative for Low-Emissions Development (“BUILD”) program has now been launched

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<sup>1</sup> DEIR at IV.C-25.

<sup>2</sup> See Settlement Agreement of CEQA litigation with Climate Resolve, <https://contracts.justia.com/companies/tejon-ranch-co-7905/contract/227292/>.

by the California Energy Commission (“CEC”) and provides “up to 300 hours of no-cost technical assistance to overcome design or construction barriers, and to complete an incentive application” as well as up to \$2 million in incentives to reduce construction costs of all-electric development.<sup>3</sup> For market-rate housing, the California Electric Homes Program (“CalEHP”) will provide \$75 million in financial incentives and technical support to further encourage the construction of new multi-family and single-family all-electric residential buildings.<sup>4</sup> The climate crisis demands a rapid end to fossil fuel reliance and all-electric homes are a key solution. There is no legitimate basis under CEQA for Metro to fail to adopt this feasible mitigation measure. Accordingly, Earthjustice asks that the DEIR be revised to include an all-electric new construction requirement.

## **I. The DEIR Fails to Adequately Assess Project Impacts**

### **A. The Project’s GHG Impacts Are Significant**

The DEIR improperly asserts the Project’s GHG impacts are not significant because “the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs.”<sup>5</sup> The Plans cited by the DEIR, such as the 2008 Scoping Plan and SCAG’s 2020-2045 RTP/SCS, do not meet CEQA’s standards for determining project-level GHG impacts are less than significant. To rely on a statewide, regional, or local plan to determine a project’s GHG impacts are less than significant, the plan must be consistent with CEQA Guideline Section 15183.5.<sup>6</sup> Purported consistency with California Air Resources Board (“CARB”) Scoping Plan measures is insufficient to meet this standard. For example, in *Center for Biological Diversity v. Dept of Fish & Wildlife*, the California Supreme Court invalidated an EIR because the lead agency did not provide substantial evidence that “the Scoping Plan’s statewide measure of emissions reduction can also serve as the criterion for an individual land use project.”<sup>7</sup> Under Section 15183.5, to qualify as a plan from which a lead agency may determine that a project’s greenhouse gas impacts are less than significant, the plan must:

- (A) Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;
- (B) Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;

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<sup>3</sup> CEC, BUILD Program Fact Sheet (Mar. 2022), [https://www.energy.ca.gov/sites/default/files/2022-03/BUILD\\_FactSheet\\_ProgramOverview\\_ada.pdf](https://www.energy.ca.gov/sites/default/files/2022-03/BUILD_FactSheet_ProgramOverview_ada.pdf).

<sup>4</sup> See CEC, Staff Workshop for the Proposed Design of the California Elec. Homes Program Presentation, at 8 (Mar. 17, 2022), <https://www.energy.ca.gov/event/workshop/2022-03/staff-workshop-proposed-design-california-electric-homes-program>.

<sup>5</sup> DEIR at IV.E-80.

<sup>6</sup> Pub. Res. Code § 21084(b).

<sup>7</sup> *Center for Biological Diversity v. Dept. of Fish & Wildlife* (2015) Cal.4<sup>th</sup> 204, 228.

- (C) Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area;
- (D) Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;
- (E) Establish a mechanism to monitor the plan’s progress toward achieving the level and to require amendment if the plan is not achieving specified levels;
- (F) Be adopted in a public process following environmental review.

The City of Los Angeles does not have an adopted climate action that meets this standard nor do the other plans cited in the DEIR comply with the requirements on Section 15183.5. For example, LA’s Green New Deal, which the DEIR cites as support for determining Project impacts are less than significant, was not subject to environmental review, includes measures that do not appear to have been implemented or for which greenhouse gas reductions are not quantified and do not serve to collectively achieve an established emissions reduction target, and does not establish a mechanism for amendments if those reductions are not achieved. Similarly, to the extent the NoHo Project is consistent with an adopted Sustainable Communities Strategy (“SCS”), CEQA is clear SCS consistency can only be used to address the NoHo Project’s growth inducing impacts and greenhouse gas impacts from “cars and light-duty truck trips generated by the Project.”<sup>8</sup> Accordingly, the DEIR cannot rely on compliance with an SCS to claim the GHG emissions from the Project’s buildings are less than significant.

Indeed, because the Project would lock-in gas use in new homes, the EIR cannot legitimately conclude that the Project is consistent with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Numerous agencies have determined that all-electric new construction is critical for California to achieve its climate objectives. For example, as concluded in the CEC Report *The Challenge of Retail Gas in California’s Low-Carbon Future*, “[i]f building electrification is delayed, missing the lower-cost opportunities for all-electric new construction and replacement of equipment upon failure, there is a greater risk that expensive early retirement of equipment may be needed, or that the climate goals could be missed.”<sup>9</sup> Similarly, in its Building Decarbonization proceeding, the California Public Utilities Commission (“CPUC”) has also recognized the problems with continued investment in fossil fuel infrastructure, directing all incentives for the BUILD Program to “new residential housing that is at a minimum, all-electric” to avoid “the risk of locking in new natural gas assets that could be unused or underutilized before the end of their life.”<sup>10</sup>

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<sup>8</sup> Pub. Res. Code § 21159.28.

<sup>9</sup> CEC, *The Challenge of Retail Gas in California’s Low-Carbon Future*, at 2 (Apr. 2020), <https://ww2.energy.ca.gov/2019publications/CEC-500-2019-055/CEC-500-2019-055-F.pdf>.

<sup>10</sup> CPUC, D.20-03-027, *Decision Establishing Building Decarbonization Pilot Programs*, at 65 (Mar. 26, 2020), <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M331/K772/331772660.PDF>.

Because there is no compliant statewide, regional, or local plan from which the DEIR can lawfully determine the NoHo Project's GHG impacts are less than significant, the DEIR should be revised to apply a net-zero GHG emissions threshold. A net-zero threshold is consistent with the severity of the climate crisis and the recognition that any increase in GHG emissions exacerbates the cumulative impacts of the climate crisis.

In determining the significance of project impacts, Metro "must ensure that CEQA analysis stays in step with evolving scientific knowledge and state regulatory schemes." *Cleveland National Forest Foundation v. San Diego Assn. of Gov'ts* (2017) 3 Cal.5th 497, 519. Non-zero numeric thresholds, such as the 1,100 metric ton ("MT") GHG significance threshold proposed by the Bay Area Air Quality Management District ("BAAQMD") in 2009 are unlikely to survive legal scrutiny. The BAAQMD numeric threshold was derived from Assembly Bill ("AB") 32's 2020 GHG reduction targets and does not reflect Senate Bill 32's requirement to reduce GHGs to 40 percent below 1990 levels by 2030 or our increased understanding of the severity of climate impacts California is and will be experiencing in the future.<sup>11</sup> While useful when first recommended ten years ago, it has not kept in step with scientific knowledge and regulatory developments and is no longer supported by substantial evidence. Similarly, alternative approaches to determining the significance of Project GHG impacts, such as using a comparison against "business-as-usual" emissions or a per capita emissions metric, may not withstand legal scrutiny and should not be used to evaluate the Project's GHG emissions. In *Center for Biological Diversity v. Cal. Dept of Fish & Wildlife* (2015) 62 Cal.4th 204, the California Supreme Court held that determining the significance of project GHG impacts by comparing project emissions with emissions under a business-as-usual scenario derived from statewide emissions reduction goals under AB 32 lacked substantial evidence. For similar reasons, use of statewide per capita emissions metrics to determine the significance of project emissions has also been rejected for the purpose of determining project GHG impacts under CEQA. As the court held in *Golden Door Properties LLC*, because "using a statewide criterion requires substantial evidence and reasoned explanation to close the analytical gap left by the assumption that the 'level of effort required in one [statewide] context . . . will suffice in the other, a specific land use development.'" *Golden Door Properties LLC v. County of San Diego* (2018) 27 Cal.App.5th 892, 904 (quoting *Center for Biological Diversity*, 62 Cal.4th at 227). While use of a statewide per capita metric to determine the significance of GHG impacts may be useful for a General Plan, which examines collective community emissions of existing and proposed new development, it is not appropriate for projects that only govern new development. Accordingly, Metro should apply a net-zero emissions GHG threshold to ensure a legally defensible EIR. Because the Project will result in an increase in GHG emissions, Metro should consider its GHG impacts significant.

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<sup>11</sup> See BAAQMD, *CEQA Guidelines Update, Proposed Thresholds of Significance* at 10-22 (Dec 7, 2009), [http://www.baaqmd.gov/~/\\_media/files/planning-and-research/ceqa/proposed-thresholds-of-significance-dec-7-09.pdf?la=en](http://www.baaqmd.gov/~/_media/files/planning-and-research/ceqa/proposed-thresholds-of-significance-dec-7-09.pdf?la=en) (explaining methodology for project-level GHG threshold).

## **B. The Project’s Energy Impacts Are Significant**

The DEIR improperly concludes that the Project “would not cause wasteful, inefficient, or unnecessary use of energy.”<sup>12</sup> A key purpose of the evaluation of project energy impacts under Appendix F is “decreasing reliance on fossil fuels[,] such as coal, natural gas and oil.” CEQA Guidelines, App. F, at Sec. I. New projects lock in energy system infrastructure for decades.<sup>13</sup> As a result, if new projects are continuously powered by carbon-emitting energy sources such as natural gas, “it will be that much more difficult for California to meet its GHG emission reduction goals.”<sup>14</sup> In furtherance of CEQA’s energy conservation mandates, electric heat pumps substantially reduce gas demand due to their superior efficiency and reliance on electric power from an increasingly decarbonized grid. Rather than needing to generate heat through the combustion of fossil gas, heat pumps extract existing heat from the surrounding environment. Because electricity is used to move heat around rather than to create it, the efficiency of heat pump water and space heating is far greater than 100 percent (energy services delivered are much greater than energy input). For example, gas water heaters advertised by Rheem, a major water heating manufacturer, have a uniform efficiency factor (“UEF”) of 0.58–0.83.<sup>15</sup> In contrast, Rheem’s heat pump water heaters have a UEF of between 3.45 to 3.80, making them four to seven times more efficient than gas alternatives.<sup>16</sup> As recognized by the CEC, “[u]sing heat pumps for space and water heating, as well as other uses, is cost-effective in the long run simply because electrification technologies can be significantly more efficient than natural gas technologies.”<sup>17</sup> Given the low inherent efficiencies of gas space and water heating as compared to heat pump options, homes that continue to rely on gas cannot be reasonably construed as “the wise and efficient use of energy” and therefore result in significant energy impacts under CEQA.

## **C. The DEIR Ignores the Public Health Impacts of Gas Combustion in Homes**

Health and safety effects, including adverse health impacts from air pollutants, may constitute significant environmental impacts for the purposes of CEQA. *See, e.g., Sierra Club v. County of Fresno*, 6 Cal.5th 502, 517–22 (2018); CEQA Guidelines § 15126.2(a). The combustion of gas in household appliances, such as stoves, produces harmful indoor air pollution, specifically carbon monoxide, nitric oxide and nitrogen dioxide (“NO<sub>x</sub>”), formaldehyde, acetaldehyde, and ultrafine particles, often in excess of the levels set out by the California Ambient Air Quality Standards and the National Ambient Air Quality Standards.<sup>18</sup> In

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<sup>12</sup> DEIR at IV.C-35.

<sup>13</sup> California Energy Comm’n (“CEC”), *2018 IEPR Update Volume II*, at 18 (Mar. 21, 2019) (“2018 IEPR Update”).

<sup>14</sup> *Id.*

<sup>15</sup> Rheem, *Gas Water Heaters*, <https://perma.cc/M687-98TU>.

<sup>16</sup> Rheem, *Professional Prestige Series ProTerra Hybrid Electric Water Heater*, <https://perma.cc/5SKF-VEMC>.

<sup>17</sup> 2018 IEPR Update at 32.

<sup>18</sup> *See, e.g.,* Jennifer M. Logue et al., *Pollutant Exposures from Natural Gas Cooking Burners: A Simulation-Based Assessment for Southern California*, 122 *Env’t Health Perspectives* 43, 43–50 (2014); Victoria L. Klug et al., *Cooking Appliance Use in California Homes—Data Collected from a Web-Based Survey*, Lawrence Berkeley Nat’l

particular, CARB has warned that “cooking emissions, especially from gas stoves, are associated with increased respiratory disease.”<sup>19</sup> Children in homes with gas stoves are particularly at risk. A meta-analysis examining the association between gas stoves and childhood asthma found that “children in homes with gas stoves have a 42 percent increased risk of experiencing asthma symptoms (current asthma)” and “a 24 percent increased risk of ever being diagnosed with asthma by a doctor (lifetime asthma).”<sup>20</sup> Other health effects of NO<sub>x</sub> in children may include cardiovascular effects, increased susceptibility to allergens and lung infections, irritated airways and other aggravated respiratory symptoms, such as chest tightness, wheezing and coughing, and learning deficits.<sup>21</sup> For these reasons, CARB has recognized “the conclusion of recent studies that 100 percent electrification of natural gas appliances in California would result in significant health benefits and reduction of GHG emissions from natural gas combustion in residential buildings.”<sup>22</sup> In assessing whether the Project exposes sensitive receptors to substantial pollutant concentrations, the DEIR ignores this impact.<sup>23</sup> In failing to require all-electric new construction, the Project will have significant public health impacts the EIR fails to acknowledge and mitigate.

## **II. Requiring All-Electric Buildings with No Connection to the Gas System is Feasible Mitigation Measures for the Project’s Significant Impacts**

Requiring all-electric buildings will substantially lessen Project impacts by reducing greenhouse gas pollution compared to mixed-fuel buildings under current grid conditions and even more so as the grid becomes increasingly decarbonized, avoiding fossil fuel lock-in, and avoiding the health impacts caused by indoor and outdoor air pollution from methane burning appliances. For example, in *Residential Building Electrification in California*, Energy and Environmental Economics (“E3”) determined that “electrification is found to reduce total greenhouse gas emissions in single family homes by approximately 30 to 60 percent in 2020, relative to a natural gas-fueled home.”<sup>24</sup> Moreover, “[a]s the carbon intensity of the grid decreases over time, these savings are estimated to increase to approximately 80 to 90 percent by 2050, including the impacts of upstream methane leakage and refrigerant gas leakage from air conditioners and heat pumps.”<sup>25</sup> As shown in the graph below, the GHG savings from heat

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Lab’y (Aug. 2011); John Manuel, *A Healthy Home Environment?*, 107 *Env’tl. Health Perspectives* 352, 352–57 (1999); Nasim A. Mullen et al., *Impact of Natural Gas Appliances on Pollutant Levels in California Homes*, Lawrence Berkeley Nat’l Lab’y (Dec. 2012); Dr. Zhu et al., *Effects of Residential Gas Appliances on Indoor and Outdoor Air Quality and Public Health in California*, UCLA Fielding School of Pub. Health, at 12–14 (Apr. 2020).

<sup>19</sup> CARB, *Combustion Pollutants & Indoor Air Quality*, <https://perma.cc/J6YH-VVZH> (as of November 19, 2020).

<sup>20</sup> Brady Seals & Andee Krasner, *Gas Stoves: Health and Air Quality Impacts and Solutions*, Rocky Mountain Institute, Physicians for Social Responsibility, and Sierra Club, at 13 (2020), <https://rmi.org/insight/gas-stoves-pollution-health/>.

<sup>21</sup> *Id.*

<sup>22</sup> CARB Resolution 20-32, *California Indoor Air Quality Program Update*, at 2 (Nov. 19, 2020), <https://ww3.arb.ca.gov/board/res/2020/res20-32.pdf>.

<sup>23</sup> See DEIR Section IV.A, Air Quality.

<sup>24</sup> E3, *Residential Building Electrification in California*, at iv (Apr. 2019), [https://www.ethree.com/wp-content/uploads/2019/04/E3\\_Residential\\_Building\\_Electrification\\_in\\_California\\_April\\_2019.pdf](https://www.ethree.com/wp-content/uploads/2019/04/E3_Residential_Building_Electrification_in_California_April_2019.pdf).

<sup>25</sup> *Id.*

pumps are substantial today and will only increase as California continues to decarbonize its grid as required under SB 100.

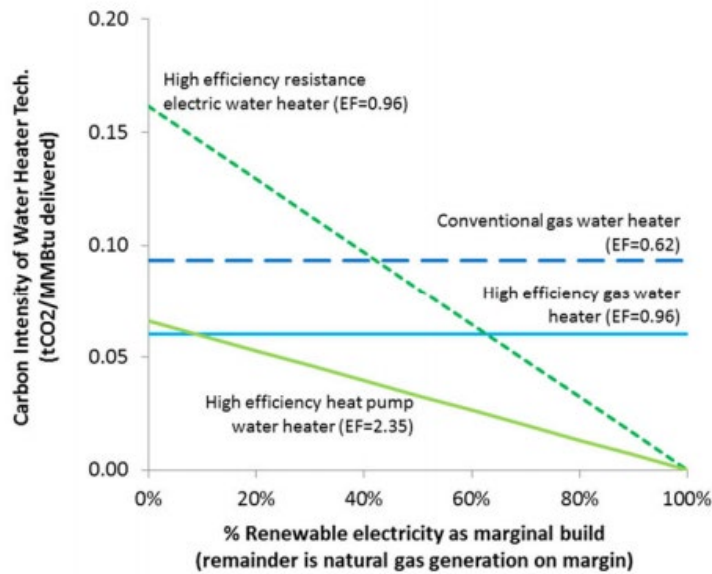


Figure 3. Carbon intensity of water heater technologies, as a function of renewable electricity percentage. Source: Author's calculations

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In contrast, because gas appliance will generate the same level of pollution over their lifetime, their emissions relative to electric alternatives will increase over time and increasingly interfere with achievement of California’s climate objectives.

CEQA mandates that government agencies must deny approval of a project presenting significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects. Pub. Resources Code § 21002. Only when feasible mitigation measures have been exhausted may an agency find that overriding considerations exist that outweigh the significant environmental effects. *Id.* § 21081; *see also* CEQA Guidelines 15091(a). This mandate—to avoid, minimize and mitigate significant adverse effects where feasible—has been described as the “most important” provision of the law. *Sierra Club v. Gilroy City Council*, 222 Cal. App. 3d 30, 41 (1990).

As demonstrated by the increasing number of all-electric projects across California, all-electric construction is feasible and routinely lower building costs compared to mixed-fuel buildings. For example, as the California Energy Commission (“CEC”) observed in its Building Decarbonization Assessment, “[t]he cost of new single-family homes is lower if built all-electric

<sup>26</sup>Amber Mahone et al., *What If Efficiency Goals Were Carbon Goals*, at 9-7, American Council for an Energy-Efficient Economy (2016), [https://aceee.org/files/proceedings/2016/data/papers/9\\_284.pdf](https://aceee.org/files/proceedings/2016/data/papers/9_284.pdf).



across most climate zones in California.”<sup>27</sup> For mid-rise multi-family homes, “[a]n average reduction of \$3,300 per unit was found” by avoiding the costs of gas piping, venting, and trenching to connect to the gas system.<sup>28</sup> Indeed, as noted in Redwood Energy’s A Zero Emissions All-Electric Multifamily Construction Guide, “[i]n the downtown of a city like Los Angeles, just trenching and piping gas to an apartment building in a busy street can cost \$140,000.”<sup>29</sup> Moreover, there are additional embedded savings from faster build-out (related to not having to install gas plumbing and piping inside of the home), and by installing one heat pump instead of a separate furnace and air conditioning. Like most residential construction, all-electric new commercial construction offers cost savings compared to mixed-fuel buildings. As the CEC summarized in its recent Integrated Energy Policy Report:

A study supporting the utility codes and standards program found that all-electric new commercial construction has mostly lower upfront costs compared to a mixed-fuel building. The cost reductions were due to avoided gas infrastructure, including planning, service extension, meter, and plumbing, even when the cost of additional wiring and panel capacity were included. The only exception was in all-electric office building construction. Incremental costs for new commercial buildings were also mostly negative across climate zones and in some cases when adding upfront costs through solar photovoltaic (PV), battery storage, and technologies more efficient than code.<sup>30</sup>

Examples of all-electric construction and their climate, health and economic benefits across building types abound.<sup>31</sup> To comply with CEQA and ensure future residents of the NoHo Project live in healthy, fossil-fuel free homes, Metro should require all-electric buildings to mitigate Project impacts.

Please ensure Matt Vespa, [mvespa@earthjustice.org](mailto:mvespa@earthjustice.org), is added to the notification list for the Final EIR and any other future updates on the Project. Thank you for your consideration of these comments.

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<sup>27</sup> CEC, *California Building Decarbonization Assessment*, at 82 (Aug. 13, 2021) (“CEC Building Decarbonization Assessment”), <https://efiling.energy.ca.gov/GetDocument.aspx?tn=239311>. See also S. Cal. Edison Co. (U 338-E) (“SCE”) Comments on Phase III Amended Scoping Memo and Ruling of Assigned Comm’r, at 11 (Dec. 20, 2021) (citing Building Decarbonization Assessment) (“SCE Opening Comments”), <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M432/K634/432634587.PDF>.

<sup>28</sup> CEC Building Decarbonization Assessment at 83.

<sup>29</sup> Redwood Energy, A Zero Emissions All-Electric Multifamily Construction Guide at 2 (2019), <https://fossilfreebuildings.org/ElectricMFGuide.pdf>

<sup>30</sup> CEC, *Final 2021 Integrated Energy Pol’y Report, Vol. 1: Building Decarbonization*, at 100 (Feb. 1, 2022), <https://efiling.energy.ca.gov/GetDocument.aspx?tn=241361>.

<sup>31</sup> See, e.g., Redwood Energy, Zero Carbon Commercial Construction: An Electrification Guide for Large Commercial Buildings and Campuses (2019), <https://www.sanjoseca.gov/home/showdocument?id=39058>; Redwood Energy, A Zero Emissions All-Electric Multifamily Construction Guide at 2 (2019), <https://fossilfreebuildings.org/ElectricMFGuide.pdf>.

Sincerely,

*Matthew Vespa*

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Matthew Vespa  
Senior Attorney  
Earthjustice  
[mvespa@earthjustice.org](mailto:mvespa@earthjustice.org)  
(415) 310-1549



GABRIELENO BAND OF MISSION INDIANS - KIZH NATION  
Historically known as The San Gabriel Band of Mission Indians recognized by  
the State of California as the aboriginal tribe of the Los Angeles basin

Thank you for your email and the proposed mitigation you provided. With respect we disagree with the proposed mitigation. Please note our consultations and mitigation pertain to our connection to the project location and our tribal cultural resources in and around the project location. Our mitigation does not speak on behalf of any other tribal entity but ours. Therefore, we ask you to keep any other tribal entity separate and out of our mitigation. Our traditions, ceremonies and resources are all different and not the same as other tribal entities. We would like you to utilize the mitigations we have provided you in my previous email on February 18, 2022. If you have any questions, please feel free to contact us.

Andrew Salas, Chairman  
Gabrieleno Band of Mission Indians – Kizh Nation

Andrew Salas, Chairman  
Albert Perez, treasurer I

Nadine Salas, Vice-Chairman  
Martha Gonzalez Lemos, treasurer II

Dr. Christina Swindall Martinez, secretary  
Richard Gradias, Chairman of the council of Elders

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May 23, 2022

**Sent Electronically**

Jason McCrea  
City of Los Angeles, Department of City Planning  
221 North Figueroa Street, Room 1350  
Los Angeles, CA 90012  
Email: [jason.mccrea@lacity.org](mailto:jason.mccrea@lacity.org)

**RE: Draft Environmental Impact Report for the District NoHo Project, ENV-2019-7241-EIR**

Dear Jason McCrea:

On behalf of the Los Angeles Conservancy, I am writing to comment on the Draft Environmental Impact Report (EIR) for the District NoHo Project (Project). The proposed Project is a high-intensity, mixed-use, transit-oriented, and multiphase development on approximately 15.9-acres of land owned by the Los Angeles County Metropolitan Transportation Authority (Metro) at and including the terminus of Metro's B (Red) Line, G (Orange) Line (Project Site) as part of a joint development effort with Metro. The development includes market rate and affordable multi-family residential units, community-serving retail, and restaurant uses, and office space that is integrated with bicycle, bus, rail, and parking facilities.

Throughout the early stages of this proposed project, we have welcomed the opportunity to discuss the scope and potential impacts of this project with Metro consultants, and we thank them for meeting. The Conservancy however remains concerned by the Project's significant impacts to historic resources, namely the Lankershim Depot at the corner of Lankershim and South Chandler Boulevards. While we better understand the desire and intent for the relocation of this historic train structure, we are not fully convinced that it is indeed necessary to achieve the project objectives.

**I. The Lankershim Depot is an important piece of Los Angeles's Transportation History**

Constructed as a one-story railroad depot in 1895, the Lankershim Depot became a stop for the Pacific Electric Red Car line in 1911. As a Red Car



stop, the depot was in continuous use from 1911-1952 when the City of Los Angeles systematically dismantled its light rail system.

Despite the end of the streetcar era, the depot found a new life as Hendrick’s Building Supply until the Los Angeles County Metropolitan Transit Authority (Metro) purchased the site in 1993 to construct the Red Line subway. For nearly three decades following the Red Line’s completion, the Lankershim Depot’s fate remained uncertain.

In 2017, the depot once again found a new use when it reopened as a coffee shop. In 2018, the depot received a Los Angeles Conservancy Preservation Award as an exceptional adaptive reuse project. Since reopening, the coffee shop has become an important community hub and breathing new life into the corner.

## **II. The siting of the Lankershim Depot is important for its ability to convey its significance**

The siting of the Lankershim Depot is an important character defining feature as it enables the building to convey its significance as a rail depot along historic rail lines. This siting relates to both its context as a rail depot and its relationship to the intersection of Lankershim and Chandler Boulevards as a Red Car stop.

As proposed, shifting the depot 45-feet to the west and 2.5-feet to the south to accommodate expansion and consolidation of transit services, specifically a new portal to the Metro North Hollywood Station would result in a significant and unavoidable impact to the historic resource. As stated in the Cultural Resources Technical Appendix prepared by Jenna Snow at Historic Preservation Consulting, such a move would physically and visually separate the Depot from its historic setting, materially altering in an adverse manner a characteristic of the historical resource that conveys its significance. The Conservancy seriously questions the eligibility of the Lankershim Depot as a historic resource after such a separation from its historic setting has occurred. We strongly believe that all projects dealing with historic resources must maintain their eligibility at project completion.

## **III. The Final EIR should fully analyze and incorporate existing historic resources**

A key policy under the California Environmental Quality Act (CEQA) is the lead agency’s duty to “take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history.”<sup>1</sup> To this end, CEQA “requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such

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<sup>1</sup>Public Resource Code, Sec. 21001 (b), (c).



effects.”<sup>2</sup> The fact that an environmentally superior alternative may be more costly or fails to meet all project objectives does not necessarily render it infeasible under CEQA.<sup>3</sup> Reasonable alternatives must be considered “even if they substantially impede the project or are more costly.”<sup>4</sup> Likewise, findings of alternative feasibility or infeasibility must be supported by substantial evidence.<sup>5</sup>

As discussed, the Project would have significant and unavoidable impacts to historic resources and could substantially deteriorate the Lankershim Depot’s ability to retain its eligibility. The City has identified six project alternatives including two no Project alternatives, one that incorporates development and the other a No Build option. Of the six, Alternative 5: Historic Preservation Alternative will have less than significant for all areas of potential impact. This Project Alternative would not incorporate new transit development in Block O West where the Depot is located, retaining the Lankershim Depot in its current location and avoid significant impacts. However, this Alternative would not meet three of the nine Project Objectives. These are:

- Promote and enhance transit ridership by consolidating and revitalizing the Metro transit center and providing enhancements to the G (Orange) Line terminus property, including an improved terminal and security office, Metro employee break room, other support structures, new Metro portal structures on the West and East sides of Lankershim, and the retention of the Historic Lankershim Depot.
- Improve Metro infrastructure in furtherance of Metro’s commitment to convert to an all-electric fleet by 2040.
- Support Metro’s regional planning efforts such as the Metro Vision 2028 Strategic Plan by improving pedestrian, bicycle, and transit facilities in North Hollywood.

While we recognize the need to meet these objectives, the Conservancy continues to believe there is a win-win outcome that may retain the Depot in place while accommodating new infrastructure that enhances the G (Orange) Line terminus, supports the future all-electric fleet, and creates a useable portal for transit riders to access the below ground light rail platforms.

#### **IV. Conclusion**

The Conservancy thanks the Project Team for previous meetings to discuss the proposed plan. We continue to see the potential for a win-win outcome and are dedicated to working with the Project Team to find a way to reduce impacts to the Depot to a less than significant effect.

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<sup>2</sup> *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41; also see Public Resources Code §§ 21002, 21002.1.

<sup>3</sup> Guideline § 15126.6(a).

<sup>4</sup> *San Bernardino Valley Audubon Soc’y v. County of San Bernardino* (1984), 155 Cal.App.3d 738, 750; Guideline § 15126(d)(1).

<sup>5</sup> Public Resources Code § 21081.5.



The Lankershim Depot was constructed in 1895 and later became a stop for the Pacific Electric Red Car line in 1911. As a Red Car stop, the depot was in continuous use from 1911-1952 when the City of Los Angeles systematically dismantled its light rail system.

For over a century the Depot has sat at the corner of Lankershim Boulevard and Chandler Boulevard. The siting of the depot at this location is integral to its history and ability to convey its significance.

**About the Los Angeles Conservancy:**

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Please do not hesitate to contact me at (213) 430-4203 or [afine@laconservancy.org](mailto:afine@laconservancy.org) should you have any questions or concerns.

Sincerely,



Adrian Scott Fine  
Senior Director of Advocacy

CC: Ken Bernstein, Office of Historic Resources



NoHo Home Alliance and ReImagine District NoHo  
11031 Camarillo Street  
North Hollywood, CA 91602  
May 13, 2022

Jason McCrea  
City of Los Angeles  
Department of City Planning  
Sent via email: jason.mccrea@lacity.org  
221 N. Figueroa Street, Suite 1350  
Los Angeles, CA 90012

Re: Comments on Draft EIR (District NoHo Project, Case No. ENV-2019-7241-EIR)

Dear Mr. McCrea:

On behalf of NoHo Home Alliance and ReImagine District NoHo, we are filing these comments to the draft EIR for the District NoHo project, because the project conflicts with the goals, objectives, policies, and programs of Los Angeles City's Housing Element (hereinafter, Housing Element) regarding affordable and equitable housing. The EIR fails to acknowledge these conflicts and, thus, fails to take adequate steps to mitigate the negative impact.

NoHo Home Alliance is a nonprofit membership organization of residents and stakeholders in the East San Fernando Valley. It is committed to addressing local issues, including homelessness and the lack of affordable housing, and to improving the health of our community. ReImagine District NoHo is a group of concerned East San Fernando Valley residents who strongly believe that the District NoHo project, as currently configured, does not meet the needs of the community or the city.

The City of Los Angeles, the County and Metro (the Los Angeles Metropolitan Transportation Authority) all recognize the overwhelming need for affordable and equitable housing in Los Angeles. It is clearly one of the top issues for residents of our city and a major concern of our public agencies. The District NoHo project is slated to develop 1527 housing units, but only 20% will be affordable.<sup>1</sup> To make matters worse, the affordable housing will not be integrated into the development, but will be placed on the periphery, away from many of the amenities.

The Land Use Chapter of the draft EIR quotes the goals of the Housing Element (IV.G-8; see also Housing Element, Chapt. 6, pg. 242) and claims there is no conflict and no need for

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<sup>1</sup> According the draft EIR, there will be 1216 market rate units and 311 affordable units. (Draft EIR, Executive Summary, pg. I-9.) Presumably, the affordable units will be very low income and low income or will be permanent supportive housing. There are no plans for moderate income housing. Furthermore, of the residential units, 411 will be studio apartments, 708 will be one-bedroom units, 299 will be two-bedroom apartments, and only 79 will be three-bedroom units. (Draft EIR, IV.G-19.)



mitigation. Yet, when one considers the Housing Element's goals, objectives, policies and programs, along with the entire text of the document and other documents, it is apparent that Los Angeles needs to create more affordable, equitable housing and has put in place various enactments to accomplish this goal. As will be shown below, contrary to the draft EIR, the District NoHo project does conflict with the Housing Elements and mitigation is required.

### Los Angeles City's Housing Element Plan Prioritizes the Need for Affordable and Equitable Housing

The Housing Element makes it clear that Los Angeles is in the midst of a housing crisis. The city has the largest number of "rent burdened" households in comparison to 20 major U.S. cities. (Housing Element, Chapt. 1, pg. 88.) The cost of renting an apartment has increased significantly. (Id., pg. 91.) Under SCAG's Regional Housing Needs Assessment (RHNA), Los Angeles needs to plan for creating 456,643 housing units. (Id., pg. 98). Of this housing, 40% or 184,721 units must be low-income housing and 16% moderate-income housing. (Id., pg. 99.). It is anticipated that new construction will not meet RHNA goals for low-income and moderate-income housing. (Id., pg. 100.) The resources for construction of affordable housing are limited. (Id., p. 100.)

The City acknowledges there is an inadequate inventory of sites to meet the RHNA allocation. (Housing Element, Chapt. 4, pg. 175.) The shortfall is greatest for low-income units (130,553), followed by moderate-income units (72,993). (Ibid.) The city's solution to this shortfall is to create a Rezoning Program that will prioritize low-income housing and mixed income communities. (Id., pg. 146.) It is unclear how realistic this list of potential sites is. For example, Appendix 4.8 to the Housing Element lists 14265 Moorpark St., Sherman Oaks as public land for potential rezoning. (Housing Element, App. 4.8, pg. 6.) However, that parcel of property is actually the Sherman Oaks Branch of the Los Angeles Public Library.

Housing constraints have a greater impact on affordable housing, and this effect is felt more heavily in areas with higher incomes, resources, amenities and access to economic opportunity. (Housing Element, Chapt. 2, pg. 121). The list of constraints, both governmental and private, is extensive, but it includes the cost of land, land use plans, zoning codes, etc. (Id., pg. 122.)

The Housing Element also states, "The need to build a more just and equitable Los Angeles has never been more urgent or more opportune." (Id., pg. 103.) The lack of affordable housing affects persons of color to a greater extent. (Id., pg. 105.) To meet these challenges, the Housing Element explicitly states, "Sites identified to accommodate the lower income RHNA must be distributed throughout the community in a manner that affirmatively furthers fair housing." (Id., pg. 111.) It acknowledges that doing this would "create opportunities to foster residential integration within those neighborhoods, which are predominantly white and are least likely to have restricted, publicly funded affordable and accessible housing..." (Ibid.) Significantly, it recognizes that the city needs to take "proactive

efforts...to reverse the legacies of discriminatory and racist policies.” (Housing Element, Exec. Summary, pg. 8.)

As is clear from the text of the Housing Element, the City of Los Angeles recognizes that it needs to increase significantly the amount of housing. It acknowledges that there is an inadequate inventory of housing sites and that additional actions must be taken to meet the RHNA allocation. It prioritizes the development of low-income housing, especially in High Opportunity Areas and other locations. Additionally, the document also makes clear that housing should be more equitable and inclusive and the city should break down barriers that have fostered segregation.

### The Housing Element Sets Objectives, Policies and Programs to Meet Those Goals

To meet the allocations set by RHNA and the goals set in the Housing Element, that document includes a lengthy series of Objectives (“a statement of specific actions that assist in reaching its goals”), Policies (“a clear statement that guides a specific course of action for decision makers to achieve a desired goal”) and Programs (“an action, procedure, program or technique that carries out goals and policies”). (Housing Element, Chapt. 6, pg. 242.) These are statements of specific conduct that the city will engage in to create the needed housing. As will be shown below, the draft EIR ignores these aspects of the Housing Element.

The Housing Element establishes the actions to be taken to satisfy the goal of affordable and equitable housing. For example, Objective 1.2 provides, “Facilitate the production of housing, *especially projects that include Affordable Housing and/or meet Citywide Housing Priorities.*” (Emphasis added.) (Id., pg. 247.) See, also, Policies 1.2.1 and 1.2.2, that, respectively, state, “Expand rental and for-sale housing for people of all income levels. Prioritize housing developments that result in a net gain of Affordable Housing and serve those with the greatest needs” and “Facilitate the construction of a range of different housing types that addresses the particular needs of the city’s diverse households.” (Ibid.)

Similarly, the Housing Element includes Objective 1.3, that provides, “Promote a more equitable distribution of housing opportunities throughout the city, with a focus on increasing Affordable Housing in Higher Opportunity Areas and in ways that further Citywide Housing Priorities. (Id., pg. 248.) In furtherance of this objective, the Housing Elements establishes Policy 1.3.1 (“Prioritize housing capacity, resources, policies and incentives to include Affordable Housing in residential development, particularly near transit, jobs and in Higher Opportunity Areas”) and Policy 1.3.2 (Prioritize the development of new Affordable Housing in all communities, particularly those that currently have fewer Affordable Units.) (Ibid.)

With regard to equitable housing, Objective 4.3 states, “Affirmatively further fair housing in all housing and land use programs by taking proactive measures to promote diverse, inclusive communities that grant all Angelenos access to housing particularly in Higher Opportunity Areas...” (Id., pg. 254). The Housing Element then establishes Policy 4.3.3. (“Examine land use practices that perpetuate exclusion and inequities, including but not limited

to: single-family/low density zoning, minimum lot size requirements, location of noxious uses and subjective design review standards...” (Ibid.)

Finally, in furtherance of these objectives and policies, the Housing Elements establishes several programs to increase the production of affordable housing. See, for example, Programs 6 & 7. (Id., pp. 260- 261.) Notably, Program 15 seeks to increase the use of public land for the creation of affordable housing. (Id., pg. 268.) Programs 41 and 42 recognize that there are not sufficient lessors of market rate apartments who are willing to accept rental vouchers. Program 41 acknowledges the need for more outreach to landlords. Program 124 relates to fair and equitable housing, stating the city should “take a variety of actions to overcome patterns of segregation and foster inclusive communities...” (Id., p. 343). Included in these actions are: developing “Zoning Code amendments and Community Plans that incentivize the development of more affordable housing in areas of high need and Higher Opportunity” (Id., pg. 344); “provide housing voucher assistance and mobility-related services to families with children to encourage families to move to lower poverty areas...” (Id., pg. 344); “replacing Segregated Living Patterns with Truly Integrated and Balanced Living Patterns...” (Id., pg. 345); and “prioritize housing capacity, resources, policies and incentives to include Affordable Housing in residential development, particularly near transit, jobs and in Higher Opportunity Areas (Id., pg. 346).

These objectives, policies and programs make clear that the provisions of the Housing Element are not words on a document to be filed and forgotten. Los Angeles cannot accept the status quo. It must be proactive in working to achieve the goals described above and that approval of new housing developments, especially those on public land, should be based on how the proposed development supports the attainment of these goals, objectives, policies and programs. This requires the Planning Department to review carefully the District NoHo project and not merely accept a statement that the project does not conflict with the Housing Element.

The District NoHo project is in conflict with the Housing Element and mitigation is required.

District NoHo is a massive project covering almost 16 acres of public land at the terminus of Metro Line B (Red Line). It will require significant number of approvals and zoning changes. (See, Los Angeles Department of City Planning, Initial Study, pp. 25-26.<sup>2</sup>) Yet for all this, the development includes only 20% affordable housing, providing the City of Los Angeles with 311 affordable units out of the 1527 units planned. Even worse, these units are segregated off on the northwest side of the development, away from the market rate housing and amenities.

The minimal amount of affordable housing does not meet the city’s goals and is inconsistent with the objectives, policies and programs that are intended to create sufficient affordable housing to meet the RHNA requirements and ameliorate the housing crisis. Even

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<sup>2</sup> [https://planning.lacity.org/odocument/564e1257-e01e-4d4e-a365-002bc665158f/District\\_NoHo\\_Project\\_Initial\\_Study\\_\(June\\_2020\).pdf](https://planning.lacity.org/odocument/564e1257-e01e-4d4e-a365-002bc665158f/District_NoHo_Project_Initial_Study_(June_2020).pdf) (Visited on May 5, 2022)

more, by placing the affordable housing off to the side, the project fails to take steps proactively to integrate the affordable housing into the development. Instead, it maintains the status quo of segregated housing and limited opportunities for persons of color who are most often the residents in income-restricted housing.

The failure of the project to comply with the Housing Element is even more apparent when one considers the various benchmarks that have been established for affordable housing by governmental agencies. District NoHo's limited amount of affordable housing is inconsistent with them. For variances in the development of Transit Oriented Communities, developers are expected to include at least 39% to 51% affordable housing. (See Los Angeles Department of City Planning, Transit Oriented Communities, FAQ.<sup>3</sup>) The original plan for the District NoHo project included 35% affordable housing.<sup>4</sup> This was consistent with Metro's 2015, policy for joint development projects of 35% affordable housing.<sup>5</sup> Metro's updated policy is even more focused on affordable housing. It seeks to develop 100% income restricted units in joint development projects, but if that is unattainable, then at least 25% should be low-income units.<sup>6</sup> Metro's updated Joint Development Policy of October 20, 2021 sets an "aspirational" 10-year goal of developing 10,000 units of which 50% will be income restricted.<sup>7</sup> It is questionable whether they will reach this goal. In January, 2021, Metro reported that, including projects in the pipeline, only 37% were affordable units.<sup>8</sup> Clearly, District NoHo with its 80/20 mix of market rate/affordable housing will only worsen the situation.

## Conclusion

We at NoHo Home Alliance and ReImagine District NoHo speak for residents of the North Hollywood and the surrounding communities, as well as transit riders who will be directly impacted by this \$1 billion development on our public land. We care deeply about ensuring that Los Angeles and the East San Fernando Valley provide affordable, equitable and inclusive housing for all our residents.

Metro, City and County officials broadly agree that Los Angeles is in an affordable housing and homelessness crisis and that proactive steps must be taken to create an inclusive environment for all our residents. But this project does nothing meaningful to achieve these goals. It is an overstatement to say draft EIR puts a bandage on the problem. Rather, it ignores

<sup>3</sup> [https://planning.lacity.org/odocument/87b0f2c2-8422-4767-a104-b7cd323ee26f/Transit-Oriented Communities - Affordable Housing Incentive Program \(FAQ\).pdf](https://planning.lacity.org/odocument/87b0f2c2-8422-4767-a104-b7cd323ee26f/Transit-Oriented%20Communities%20-%20Affordable%20Housing%20Incentive%20Program%20(FAQ).pdf) (Visited on May 5, 2022)

<sup>4</sup> [https://www.dropbox.com/sh/gsn9mm0h8jgt2hr/AAA9jHikxZD3\\_pMHavJIMPSHa/Project%20Documents?dl=0&preview=sfv\\_noho\\_guide\\_2015-12.pdf&subfolder\\_nav\\_tracking=1](https://www.dropbox.com/sh/gsn9mm0h8jgt2hr/AAA9jHikxZD3_pMHavJIMPSHa/Project%20Documents?dl=0&preview=sfv_noho_guide_2015-12.pdf&subfolder_nav_tracking=1) (Visited May 5, 2022.)

<sup>5</sup> <https://thesource.metro.net/2021/01/27/metro-releases-paper-on-updating-affordable-housing-policy-in-response-to-areas-housing-crisis/> (Visited on May 5, 2022.)

<sup>6</sup> <https://www.dropbox.com/s/mppuors403e75o0/JD%20Policy%202021%20FINAL.pdf?dl=0> (Visited on May 5, 2022.)

<sup>7</sup> <https://metro.legistar.com/ViewReport.ashx?M=R&N=TextL5&GID=557&ID=7882&GUID=LATEST&Title=Board+Report> Metro contends that this policy does not apply to District NoHo because it only applies "going forward."

<sup>8</sup> <https://kfiam640.iheart.com/content/2021-01-20-metros-affordable-housing-team-shares-goals-progress/> (Visited on May 5, 2022.)

the problem, claiming that a minimal amount of affordable housing on the periphery of the project entirely in compliance with the City's and Metro's plans and goals for resolving the homelessness crisis and providing equitable housing for all. This is incorrect. We urge that the draft EIR be amended to mitigate the lack of affordable and equitable housing.

Sincerely,

**NoHo Home Alliance**

*Rev. Stephanie Jaeger*

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Rev. Stephanie Jaeger, Executive Director

*Andrew Silver*

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Andrew Silver, Board President

**Relmagine District NoHo**

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Glenn Block

*Truman Capps*

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Truman Capps

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Desmond Faison

*Elaine Loring*

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Elaine Loring

*Barbara Motz*

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Barbara Motz



Jason McCrea <jason.mccrea@lacity.org>

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## NoHo Housing / District NoHo Draft EIR Case ENV-2019-7241-EIR

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**Liz Barnes** <lizbarnes.casting@gmail.com>

Mon, May 23, 2022 at 11:58 AM

To: jason.mccrea@lacity.org

Cc: councilmember.krekorian@lacity.org

Dear Councilmember Krekorian and Mr. McCrea,

I have owned my home in North Hollywood for 14 years. My family and I are proud to live in this diverse, vibrant part of Los Angeles.

Affordable housing is one of the most urgent issues facing our community. I am concerned about the draft EIR for the District NoHo project. I do not believe the current plan will further equitable housing or solve our housing emergency.

I urge you to work toward increasing the number of affordable units required by this project and all future projects.

Sincerely,

Elizabeth Barnes Keener

5513 Cartwright Ave

North Hollywood 91601

[elizabethbarnescasting.com](http://elizabethbarnescasting.com)



Jason McCrea <jason.mccrea@lacity.org>

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## District NoHo Draft EIR Case ENV-2019-7241-EIR

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**Robin Broder Hytowitz** <robin.hytowitz@gmail.com>  
To: jason.mccrea@lacity.org, councilmember.krekorian@lacity.org

Mon, May 23, 2022 at 11:24 AM

Apologies for the earlier message, I think the font ended up as white when I wrote the message. Please see below.

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Dear Councilmember Krekorian and Mr. McCrea,

I share the concerns raised by NoHo Home Alliance and ReImagine District NoHo Housing regarding the draft EIR for the District NoHo project.

Contrary to the statements in draft EIR, the current plan conflicts with the Housing Element and Metro and the City's many policies and stated goals for solving LA's housing emergency and furthering fair and equitable housing. The project plan must be revised to significantly increase the number of affordable and integrated homes for our community.

Thank you for listening to my concerns.

Sincerely,  
Robin Hytowitz  
Encino, CA

On Mon, May 23, 2022 at 6:45 AM Robin Broder Hytowitz <robin.hytowitz@gmail.com> wrote:

Dear Councilmember Krekorian and Mr. McCrea,

I share the concerns raised by NoHo Home Alliance and ReImagine District NoHo Housing regarding the draft EIR for the District NoHo project.

Contrary to the statements in draft EIR, the current plan conflicts with the Housing Element and Metro and the City's many policies and stated goals for solving LA's housing emergency and furthering fair and equitable housing. The project plan must be revised to significantly increase the number of affordable and integrated homes for our community.

Thank you for listening to my concerns.

Sincerely,  
Robin Hytowitz  
Encino, CA



Jason McCrea &lt;jason.mccrea@lacity.org&gt;

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**District NoHo Draft EIR Case ENV-2019-7241-EIR**

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**Eric Cardinal** <eric.cardinal@att.net>  
To: Jason.McCrea@lacity.org  
Cc: councilmember.krekorian@lacity.org

Sun, May 22, 2022 at 1:00 PM

**SUBJECT: District NoHo Draft EIR Case ENV-2019-7241-EIR**

Dear Mr. McCrea,

The draft Environmental Impact Report is long – seemingly meant for lawyers, developers, and planning experts. I am a member of the community concerned that the project as designed does not meet the needs of Valley residents, workers and transit riders who will be directly impacted by this \$1Billion development on our **public land**.

Metro, City and County officials broadly agree that Los Angeles is in an affordable housing and homelessness emergency. Here's a straightforward opportunity to do something about it.

The EIR for District NoHo claims that the project is in compliance with a wide range of housing and equity policies such as :

- RHNA
- the Housing Element
- the City's goal of ensuring a range of housing to enable a 'reasonable portion of the City's work force to both live and work in the City'
- housing that 'fosters racially and socially inclusive neighborhoods and corrects historic harms of racial, ethnic, and social discrimination of the past and present'

I disagree. A plan for just 311 affordable homes out of 1527 (barely 20 percent) on public land in the middle of North Hollywood at a transit hub is not in compliance with these goals, policies and programs. A plan that is designed to segregate the community by income, which is likely to segregate the community by race and ethnicity, is not in compliance with these policies and goals.

I strongly agree with the analysis submitted by NoHo Home Alliance and ReImagine District NoHo. This plan needs to be revised to be in compliance and to serve the needs of our community.

Sincerely,  
Eric Cardinal  
Studio City





Jason McCrea <jason.mccrea@lacity.org>

## District NoHo Draft EIR Case ENV-2019-7241-EIR

Christina Dirkes <christinadirkes@gmail.com>

Sat, May 21, 2022 at 3:13 PM

To: jason.mccrea@lacity.org

Cc: councilmember.krekorian@lacity.org

Hi there, Mr. McCrea,

I'm Tina Dirkes, and I live in Valley Glen in North Hollywood.

I share the concerns raised by NoHo Home Alliance and ReImagine District NoHo Housing regarding the draft EIR for the District NoHo project.

Contrary to the statements in the draft EIR, the current plan conflicts with the Housing Element and numerous policies designed to address Los Angeles' housing emergency and to further fair and equitable housing in the city. The project plan must be revised to significantly increase the number of affordable and integrated homes so that the project is in compliance.

The draft Environmental Impact Report is long – seemingly meant for lawyers, developers, and planning experts. I am a member of the community concerned that the project as designed does not meet the needs of Valley residents, workers and transit riders who will be directly impacted by this \$1Billion development on our public land.

Metro, City and County officials broadly agree that Los Angeles is in an affordable housing and homelessness emergency. Here's a straightforward opportunity to do something about it.

The EIR for District NoHo claims that the project is in compliance with a wide range of housing and equity policies such as :

- RHNA
- the Housing Element
- the City's goal of ensuring a range of housing to enable a 'reasonable portion of the City's work force to both live and work in the City'
- housing that 'fosters racially and socially inclusive neighborhoods and corrects historic harms of racial, ethnic, and social discrimination of the past and present'

That's simply NOT true. A plan for just 311 affordable homes out of 1527 on public land in the middle of North Hollywood at a transit hub is not in compliance with these goals, policies and programs. A plan that is designed to segregate the community by income, which is likely to segregate the community by race and ethnicity, is not in compliance with these policies and goals.

This plan needs to be reimagined to be in compliance and to serve the needs of our community.

Signed,  
Tina Dirkes  
Valley Glen/North Hollywood

.....  
Christina Dirkes  
[christinadirkes.com/graphic-design](http://christinadirkes.com/graphic-design)  
[christinadirkes@gmail.com](mailto:christinadirkes@gmail.com)  
616-914-9939



Jason McCrea <jason.mccrea@lacity.org>

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## District NoHo Draft EIR Case ENV-2019-7241-EIR

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Jason Enright <jasonenright5@gmail.com>  
To: jason.mccrea@lacity.org  
Cc: councilmember.Krekorian@lacity.org

Fri, May 20, 2022 at 3:36 PM

Dear Mr. McCrea,

I share the concerns raised by NoHo Home Alliance and ReImagine District NoHo Housing regarding the draft EIR for the District NoHo project.

Contrary to the statements in the draft EIR, the current plan conflicts with the Housing Element and numerous policies designed to address Los Angeles' housing emergency and to further fair and equitable housing in the city. The project plan must be revised to significantly increase the number of affordable and integrated homes so that the project is in compliance.

It is important when our city makes deals with private developers to build on public land that we hold ourselves and those developers to a high standard and set the example for what we want to see in our city. If we are going to build our way out of this homelessness crisis we need to build more affordable housing and this project is an amazing opportunity to do so.

Sincerely,  
Jason Enright  
North Hollywood homeowner



Jason McCrea &lt;jason.mccrea@lacity.org&gt;

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## District NoHo Draft EIR Case ENV-2019-7241-EIR

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Dana Goldberg &lt;danansteve@mac.com&gt;

Mon, May 16, 2022 at 10:13 AM

To: jason.mccrea@lacity.org

Cc: councilmember.krekorian@lacity.org

Dear Councilmember Krekorian and Mr. McCrea,

As a resident of the East San Fernando Valley, an active member of the Temple Beth Hillel Taskforce on Homelessness, and a volunteer at NoHo Home Alliance, I share the concerns raised by NoHo Home Alliance and ReImagine District NoHo Housing regarding the draft EIR for the District NoHo project.

Contrary to the statements in the draft EIR, the current plan conflicts with the Housing Element and numerous policies designed to address Los Angeles' housing emergency and to further fair and equitable housing in the city. The project plan must be revised to significantly increase the number of **affordable and integrated** homes so that the project is in compliance.

This massive project covering almost 16 acres of public land offers a great opportunity to show the city's commitment to meeting identified affordable housing goals. Let's not squander it.

Sincerely,

Dana Goldberg  
Resident of Sherman Oaks  
Frequent user of the Metro Line B (Red Line)



Jason McCrea &lt;jason.mccrea@lacity.org&gt;

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**District NoHo Draft EIR Case ENV-2019-7241-EIR**

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Caitlin Goss &lt;goss.cait@gmail.com&gt;

Fri, May 20, 2022 at 3:27 PM

To: jason.mccrea@lacity.org, councilmember.krekorian@lacity.org

Dear Councilmember Krekorian and Mr. McCrea,

My family has been in North Hollywood for over 50 years, and we have seen it grow and evolve over many generations. I love my neighborhood deeply, and I have also seen how gentrification is pushing out affordable housing and exacerbating an already terrible problem for our unhoused neighbors and community members. I want to reimagine our little city into a space that is inclusive for all, provides safe community spaces and affordable housing for our community.

I share the concerns raised by NoHo Home Alliance and ReImagine District NoHo Housing regarding the draft EIR for the District NoHo project.

Contrary to the statements in draft EIR, the current plan conflicts with the Housing Element and Metro and the City's many policies and stated goals for solving LA's housing emergency and furthering fair and equitable housing. The project plan **must be revised to significantly increase the number of affordable and integrated homes for our community.**

--

**Warmly,  
Cait**

North Hollywood Resident

Mx. Cait Goss  
(They/She)  
Teacher/Director [Our Children's Place Cooperative Preschool](#)  
Website: [www.formyfellowdaydreamers.com](http://www.formyfellowdaydreamers.com)

**"Your task is not to seek for love, but merely to seek and find all the barriers within yourself that you have built against it."-Rumi**



Jason McCrea <jason.mccrea@lacity.org>

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## District NOHO Draft EIR Case ENV-2019-7241-EIR

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**Rosemary Leibowitz** <rleibowi@sbcglobal.net>

Sat, May 14, 2022 at 9:34 AM

Reply-To: Rosemary Leibowitz <rleibowi@sbcglobal.net>

To: "jason.mccrea@lacity.org" <jason.mccrea@lacity.org>, City of Los Angeles <councilmember.krekorian@lacity.org>

I am writing to share the concerns raised by NoHome Alliance and Reimagine District NoHo Housing in regards to the draft EIT for the District NoHo Project.

Contrary to the statements in the draft EIR, the current plan conflicts with the Housing Element and numerous policies designed to address the housing emergency in Los Angeles. The project plan must be revised to significantly increase the number of affordable and integrated homes so that the project is in compliance.

Sincerely  
Rose Leibowitz  
Studio City

[Sent from AT&T Yahoo Mail on Android](#)



Jason McCrea &lt;jason.mccrea@lacity.org&gt;

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**Support for District NoHo Project, Case Number: ENV-2019-7241-EIR**

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Anne Mathews <amathews818@gmail.com>  
To: jason.mccrea@lacity.org  
Cc: jaime@abundanthousingla.org

Thu, May 19, 2022 at 10:17 AM

Sent via email to [jason.mccrea@lacity.org](mailto:jason.mccrea@lacity.org)

RE: Support for District NoHo Project, Case Number: ENV-2019-7241-EIR

Dear Mr. McCrea,

We are writing to you in support of the proposed District NoHo Project located at 11100, 11440, and [11163–11347 Chandler Boulevard](#); 11204–11270 Cumpston Street; 5300–5320 Bakman Avenue; and [5311–5430 Lankershim Boulevard, Los Angeles, California 91601](#). We urge the city to approve the project.

The greater Los Angeles region is facing a severe housing shortage, and this project is another step towards addressing the overwhelming need for more housing across Los Angeles. We commend the project applicant, including Metro, for pursuing infill housing in the redevelopment of the surface parking lot, among other parcels on the project site. We also appreciate the 311 affordable units proposed. This project is in a great location for housing, especially affordable housing, at the North Hollywood hub for transit options with frequent Metro bus service in all directions and potential future connection to the NoHo to Pasadena Bus Rapid Transit route. This project site would provide future residents with good transit access to employment centers in the San Fernando Valley, Hollywood, and in downtown LA. In addition, many desirable neighborhood amenities such as restaurants and retail within the NoHo Arts District are in easy walking and bicycling distance.

This project is a good project for Los Angeles and for the southeast Valley. Again, we urge the city to support the District NoHo project.

I'm a lifelong San Fernando Valley resident. I went to North Hollywood High School and I currently live near Moorpark and Lankershim. I work in North Hollywood. I eat out in NoHo and take the Red Line. Putting more housing in the valley, especially near a transit hub, is great for the future of the SFV.

Best Regards,

San Fernando Valley for All  
*A chapter of Abundant Housing LA*  
Anne Mathews

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Anne Mathews  
C: (818) 915-9601

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 **District NoHo Project - Anne Mathews.pdf**  
45K



Jason McCrea &lt;jason.mccrea@lacity.org&gt;

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**District NoHo Draft EIR Case ENV-2019-7241-EIR**

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**Logan Rees** <jloganrees@gmail.com>  
To: jason.mccrea@lacity.org  
Cc: councilmember.krekorian@lacity.org

Sun, May 15, 2022 at 12:38 PM

Dear Councilmember Krekorian and Mr. McCrea,

I share the concerns raised by NoHo Home Alliance and Relmagine District NoHo Housing regarding the draft EIR for the District NoHo project.

Contrary to the statements in draft EIR, the current plan conflicts with the Housing Element and Metro and the City's many policies and stated goals for solving LA's housing emergency and furthering fair and equitable housing. The project plan must be revised to significantly increase the number of affordable and integrated homes for our community.

More market rate housing will not solve the city's housing emergency. This project is being developed on PUBLIC land, and the housing should therefore be PUBLIC housing. Using public land to funnel more money to contractors and giant real estate corporations in the midst of the worst housing crisis in the city's history is unconscionable. You have a historic chance to use public land for public good. Please do the right thing and reconsider this project.

--

Logan Rees

(He/Him)

JLoganRees@gmail.com

[www.logan-rees.com](http://www.logan-rees.com)



Jason McCrea &lt;jason.mccrea@lacity.org&gt;

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## District NoHo Draft EIR Case ENV-2019-7241-EIR

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Kathleen Schwartz &lt;knschwartz77@gmail.com&gt;

Sat, May 21, 2022 at 7:39 AM

To: councilmember.krekorian@lacity.org, jason.mccrea@lacity.org

**District NoHo housing project: 20% Affordable Housing is not enough!**

Dear Councilmember Krekorian and Mr. McCrea:

My name is Kathleen Schwartz and I am a constituent in LA City Council District 2. I share the concerns raised by NoHo Home Alliance (where I volunteer washing dishes every Wednesday) regarding the draft EIR for the District NoHo project.

The current draft plan conflicts with the City of Los Angeles's many policies and stated goals for solving LA's housing emergency and creating more fair and equitable housing. The project plan should be revised to significantly increase the number of affordable and integrated homes for our community.

Please make a bold commitment to help the unhoused! Thank you in advance for making this happen.

Kathleen Schwartz  
[6556 Ethel Avenue](#)  
[North Hollywood](#)





Jason McCrea <jason.mccrea@lacity.org>

## District NoHo Draft EIR Case ENV-2019-7241-EIR

2 messages

**Truman Capps** <trumancapps@gmail.com>

Sat, May 21, 2022 at 1:29 PM

To: jason.mccrea@lacity.org

Cc: Council Member Krekorian <councilmember.krekorian@lacity.org>

Dear Councilmember Krekorian and Mr. McCrea,

I share the concerns raised by NoHo Home Alliance and ReImagine District NoHo Housing regarding the draft EIR for the District NoHo project.

Contrary to the statements in the draft EIR, the current plan conflicts with the Housing Element and numerous policies designed to address Los Angeles' housing emergency and to further fair and equitable housing in the city. The project plan must be revised to significantly increase the number of affordable and integrated homes so that the project is in compliance.

Sincerely,  
Truman Capps  
Studio City

**Jason McCrea** <jason.mccrea@lacity.org>

Mon, May 23, 2022 at 10:20 AM

To: Truman Capps <trumancapps@gmail.com>

Hello,

Your comment has been received and will be incorporated into the Final EIR.

Thank you.

[Quoted text hidden]

--



**Jason McCrea**

Major Projects

**Los Angeles City Planning**

221 N. Figueroa St., Room 1350

Los Angeles, CA 90012

Planning4LA.org

T: (213) 847-3672





Jason McCrea <jason.mccrea@lacity.org>

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## District Noho draft EIR case ENV 2019-7421-EIR

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**Karen Haber** <karenhaber77@gmail.com>

Sun, May 22, 2022 at 7:41 PM

To: jason.mccrea@lacity.org

Cc: Paul Krekorian <councilmember.krekorian@lacity.org>, advocacy@nohohome.org

Dear Councilmember Krekorian and Mr. McCrea,

I share the concerns raised by NoHo Home Alliance and ReImagine District NoHo Housing regarding the draft EIR for the District NoHo project.

Contrary to the statements in the draft EIR, the current plan conflicts with the Housing Element and numerous policies designed to address Los Angeles' housing emergency and to further fair and equitable housing in the city. The project plan must be revised to significantly increase the number of **affordable and integrated** homes so that the project is in compliance.

Thank you for reading this,

Karen Haber Camp

Valley Village

91607

Sent from my iPhone



Jason McCrea &lt;jason.mccrea@lacity.org&gt;

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**District NoHo Draft EIR Case ENV-2019-7241-EIR**

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**sandra kiley** <sandra.w.kiley@gmail.com>

Sun, May 15, 2022 at 7:36 AM

To: jason.mccrea@lacity.org

Cc: councilmember.krekorian@lacity.org

Dear Councilmember Krekorian and Mr. McCrea,

I share the concerns raised by NoHo Home Alliance and ReImagine District NoHo Housing regarding the draft EIR for the District NoHo project.

Contrary to the statements in the draft EIR, the current plan conflicts with the Housing Element and numerous policies designed to address Los Angeles' housing emergency and to further fair and equitable housing in the city. The project plan must be revised to significantly increase the number of **affordable and integrated** homes so that the project is in compliance.

Sincerely,

Sandra Kiley

Studio City/North Hollywood

Sandra W. Kiley, MPH, CHW

mobile (213)434-8675



Jason McCrea <jason.mccrea@lacity.org>

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## District NoHo Draft EIR Case ENV-2019-7241-EIR

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**Andrea Noto** <drea.noto@gmail.com>  
To: jason.mccrea@lacity.org  
Cc: councilmember.krekorian@lacity.org

Sat, May 21, 2022 at 6:16 AM

Dear Councilmember Krekorian and Mr. McCrea,

I share the concerns raised by NoHo Home Alliance and ReImagine District NoHo Housing regarding the draft EIR for the District NoHo project.

Contrary to the statements in draft EIR, the current plan conflicts with the Housing Element and Metro and the City's many policies and stated goals for solving LA's housing emergency and furthering fair and equitable housing. The project plan must be revised to significantly increase the number of affordable and integrated homes for our community.

Sincerely,  
Andrea Noto  
North Hollywood



Jason McCrea <jason.mccrea@lacity.org>

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## District NoHo Draft EIR Case ENV-2019-7241-EIR

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**Lori H schwartz** <lori@worldofschwartz.com>  
To: jason.mccrea@lacity.org  
Cc: councilmember.krekorian@lacity.org

Fri, May 20, 2022 at 2:33 PM

Dear Councilmember Krekorian and Mr. McCrea,  
I share the concerns raised by NoHo Home Alliance and ReImagine District NoHo Housing regarding the draft EIR for the District NoHo project.

Contrary to the statements in draft EIR, the current plan conflicts with the Housing Element and Metro and the City's many policies and stated goals for solving LA's housing emergency and furthering fair and equitable housing. The project plan must be revised to significantly increase the number of affordable and integrated homes for our community.

Lori H. Schwartz



Jason McCrea <jason.mccrea@lacity.org>

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## District NoHo Draft EIR Case ENV-2019-7241-EIR

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**Suju Vijayan** <sujuvijayan@gmail.com>  
To: jason.mccrea@lacity.org  
Cc: councilmember.krekorian@lacity.org

Fri, May 20, 2022 at 2:56 PM

Dear Mr. McCrea,

I share the concerns raised by NoHo Home Alliance and ReImagine District NoHo Housing regarding the draft EIR for the District NoHo project.

Contrary to the statements in the draft EIR, the current plan conflicts with the Housing Element and numerous policies designed to address Los Angeles' housing emergency and to further fair and equitable housing in the city. The project plan must be revised to significantly increase the number of **affordable and integrated** homes so that the project is in compliance.

Sincerely,

Suju Vijayan  
Sherman Oaks



Jason McCrea &lt;jason.mccrea@lacity.org&gt;

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## District NoHo Draft EIR Case ENV-2019-7241-EIR

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Peter Haderlein <peter.haderlein.nohonc@gmail.com>

Tue, May 24, 2022 at 4:52 PM

To: jason.mccrea@lacity.org

Cc: councilmember.krekorian@lacity.org

Dear Councilmember Krekorian and Mr. McCrea,

I am writing regarding the draft EIR for the District NoHo project. I watched presentations about it years ago as a board member of the NoHo Neighborhood Council and I am dissapointed to see that the project is still not meeting the needs of the community.

The District NoHo project is planning to develop 1527 housing units, but only 20% will be affordable. Los Angeles is in the midst of an affordable housing crisis that is placing rent burdens on millions while forcing thousands to live on the street. The District NoHo Project should not proceed without allotting a higher percentage of units that are available to low-income Angelenos.

In addition, the ostensibly affordable units will be sited on the periphery of the development, which is in blatant violation of the city's Housing Element, which states:

***“Sites identified to accommodate the lower income RHNA must be distributed throughout the community in a manner that affirmatively further fair housing.”***

Because the current plan conflicts with the Housing Element as well as Metro policies regarding affordable housing infill near transit oriented zones, the project plan should be revised.

Sincerely,

Peter Haderlein