



NANDC
 North Area Neighborhood Development Council
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November 27, 2017

Via Email: milena.zasadzien@lacity.org

Milena Zasadzien
 Los Angeles Department of City Planning
 200 North Spring Street, Room 750
 Los Angeles, CA 90012-3243

Re: Comments on Draft Environmental Impact Report for The Fig Project; 3900 S. Figueroa Street, Los Angeles, CA 90037; Case No. ENV-2016-1892-EIR; SCH No. 2016071049

Dear Ms. Zasadzien,

The Neighborhood Council system enables civic participation for all Angelenos and serves as a voice for improving government responsiveness to local communities and their needs. We are an advisory body to the City of Los Angeles, comprised of volunteer stakeholders who are devoted to the mission of improving our communities and bringing government to us.

The Empowerment Congress North Area Neighborhood Development Council (NANDC) considered the Draft Environmental Impact Report for The Fig Project and found that the proposed demolitions cannot be supported in the context of the goals of the Community Plan and the CRA Hoover Project Area goals. NANDC strongly objects to the demolition of eight multi-family residence within the Flower Drive Historic District and, by Board motion at its meeting of November 2, 2017, urges the developer to consider an alternative that incorporates these buildings into his project design.

The eight buildings, of which seven are contributors to the Flower Drive Historic District and the eighth is a 1939 building compatible in massing, scale and materials to the District, offer affordable, rent stabilized housing which is severely needed. A representative of some of the tenants attended our November 2 Board meeting and stated that the tenants want to remain in their current Flower Drive historic housing. This project as presently designed would destroy RSO housing and displace many families, some of whom have been at this site for decades.

The demonstrable negative impacts on both housing resources and on the Flower Drive Historic District are not sufficiently analyzed nor are they adequately mitigated. The cumulative impacts on housing and on historic resources are also not adequately recognized nor evaluated. The DEIR consistently states that these negative impacts are unavoidable which is simply not true. A project design that incorporates the Flower Drive Historic District and builds on the non-historic parcels is possible. We also note that the project



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originally included a 21 story hotel tower which allowed for more flexibility in site planning. Over time and for reasons not explained, the project became flattened to a seven story project consisting of a hotel, a student housing component and a mixed income housing component making a preservation and retaining RSO housing goal more difficult to achieve and design. These limitations are self-imposed. We believe that an alternative can be devised that preserves the historic and rent controlled housing while meeting most of the project's objectives. We also urge the developer to make the majority of the parking underground which would also allow for a design that is more flexible and aesthetically pleasing.

We urge that a DEIR be revised and recirculated that considers a true preservation and housing retention alternative. Of the limited alternatives analyzed in the DEIR, only alternative 2 preserves the Flower Drive Historic District and of those limited choices we would urge that the environmentally superior alternative be chosen. But the choices should not be limited to the four contained in the DEIR.

Sincerely,

Adrienne Kuhre, President

Empowerment Congress North Area Neighborhood Development Council