



July 27, 2016

Los Angeles City Planning Commission
Los Angeles City Hall, Room 272
200 N. Spring St.
Los Angeles, CA 90012

**RE: REEF Project - 1900 South Broadway
CPC-2014-1771-GPA-VZC-SN-VCU-MCUP-CUX-ZV-SPR-MSC
CPC-2014-1772-DA
VTT-72914
ENV-2014-1773-EIR**

Dear Los Angeles City Planning Commissioners:

I submit this letter on behalf of the United Neighbors In Defense Against Displacement (UNIDAD) coalition to express our deep concerns with the proposed development at 1900 South Broadway, otherwise referred to as the Reef Project (“the Project”).

PHR LA MART, LLC (the Applicant) seeks approval to construct a development that deviates from the existing code in numerous and significant ways. The Project seeks a laundry list of exceptions and fundamental rule changes, including General Plan amendments, a zone change, several conditional use permits, FAR averaging, parking reductions and other significant departures from the City’s General Plan and other adopted plans and policies. All of these entitlements are being requested to enable the development of 1,444 residential units and hundreds of thousands of square feet of commercial uses and electronic signage on a site that is currently zoned for industrial use. As proposed, the Project is inconsistent with standards for equitable and inclusive development, and conflicts with numerous important planning and development standards and General Plan policies. For more, see the attached letter dated June 20, 2016.

Along with many partners, UNIDAD has engaged community residents, small businesses, community- and faith-based organizations, educational institutions and other stakeholders located around the Project for nearly 2 years. Despite these efforts and repeated requests to partner with City leaders and the Reef investors to develop a community-driven vision and plan for development in South LA, we have not seen a commitment to a genuine community process and have seen no evidence that a necessarily significant, transparent and enforceable agreement for community benefits and health impact mitigations will be incorporated into the Project proposal. For instance, a thoughtful set of community proposals (attached) were developed following a 12-month outreach effort and intensive 3-month priority-setting process with more than 200 community residents. Since submitting these proposals in March 2016, we have received no acknowledgment, let alone a response, from City leaders or the Applicant. **For these reasons – and those further detailed below and in the attached - we stand in opposition to the Reef Project, as proposed.**

At this time, we have not seen the pending Staff Report. (We deliver these documents in time to be included in the official City Planning Commission packet.) Our understanding is that the Staff Report will include a set of “community benefits.” Based on information in public statements



from and direct conversations with the Applicant, we do not believe these benefits will come close to addressing the severe impacts on the community anticipated by the Project, nor will they address the significant assets and needs of the local community. We will follow with an additional direct response to the Staff Report in advance of the City Planning Commission hearing scheduled for August 11, 2016.

We have enumerated our concerns and proposals in multiple formats and written documentation at every stage of the public process thus far. For your review, we include several of these documents, including:

- This cover letter summarizing our position on the Project;
- Our letter to the LA City Planning Department Hearing Officer, dated June 20, 2016
- An appeal of Vesting Tentative Tract Map No. VTT-72914;
- A Health Impact Report conducted by Human Impact Partners, entitled “Assessing Health and Equity Impacts of the Proposed Reef Development Project in South Central Los Angeles,” which documents significant health impacts that would be caused by the Project;
- “Community Benefits Proposal, Reef Development”, dated March 21, 2016; and
- Comments on the Draft Environmental Impact Report (DEIR), dated November 2, 2015.

We have also included for your review, a few additional pieces that provide important analyses and context:

- A letter from the Los Angeles County Department of Public Health regarding the Reef Project, submitted on May 23, 2016 to the Chair of the Planning and Land Use Committee of the Los Angeles City Council, The Honorable Jose Huizar;
- A journalism piece dated June 14, 2016 by Sahra Sulaiman of the LA Streetsblog publication entitled “Jobs or Housing? Historic South Central Residents Decry Feeling Asked to Choose by Billion Dollar Reef Project”;

Background on UNIDAD

United Neighbors in Defense Against Displacement (UNIDAD) is a coalition of tenants, homeowners, workers, business owners, students, teachers, health providers and advocates, faith congregations, and community-based organization who work together to create a healthy and strong South Los Angeles community by ensuring that the interests of low-income communities, especially low-income communities of color, are represented in the decisions and processes that drive development in our neighborhoods.

Our collaborative was formed in the early 1990s. In all of our work, we have sought to deepen the quality of community resident engagement in land use and economic development policy creation and implementation, knowing that such engagement ultimately results in better planning and implementation. We have built capacity among local residents to be active participants in the planning processes through community-based programs, such as People’s Planning School. Through this process residents have created a set of Equitable Development Principles that guide our work.



These comments draw upon our years of experience living and working in this community and engaging in land use planning and development processes, including the LA Live development, the USC Specific Plan, the Lorenzo housing project at the 23rd St. Expo Line station, the Grand Metropolitan mixed use project at the Washington/Grand Blue Line station, the City’s Housing Element, the Health and Wellness Element, and the updates to the Southeast LA and South LA Community Plans. Our member organizations are long-standing members of this community and are active in numerous economic development projects and programs, affordable housing and commercial development, health care service provision, social services, faith-based community building, the Community Plan Advisory Committees, and the Los Angeles Department of Public Health’s Community Prevention and Population Health Task Force.

These comments also draw upon the results of a rigorous community engagement process over the course of several months in 2015 and 2016. UNIDAD organizations convened hundreds of South Central community members to discuss the proposed Project and to lift up a vision for development in this neighborhood. This visioning process culminated in a community-based analysis of impacts of the proposed Project and a community benefits proposal that called for funding and/or support for the following: affordable housing, displacement prevention, good permanent and construction jobs at the development and support for local job programs, support for existing small businesses, health and safety improvement measures, programs for the homeless, green space, youth development, and community benefits implementation. The full proposal is attached and can be found online at <http://www.unidad-la.org/resources/>.

We appreciate the tremendous efforts of the City Planning Commission to review and analyze projects and plans that will shape communities for generations to come. It takes great time and energy to review a project like the Reef given its massive size numerous requests for deviations from existing land use policy. We urge you to not rush this Project and consider deeply the vast opposition and division in the community surrounding the Reef.

On behalf of the UNIDAD Coalition¹,

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¹ For more information on the UNIDAD coalition, visit <http://www.unidad-la.org/who-we-are/>