



DEPARTMENT OF CITY PLANNING APPEAL RECOMMENDATION REPORT

City Planning Commission

Date: October 10, 2019
Time: After 8:30 a.m.*
Place: Los Angeles City Hall
City Council Chambers
200 North Spring Street, Room 340
Los Angeles, CA 90012

Public Hearing: Required
Appeal Status: Not Further Appealable
Expiration Date: October 10, 2019

Case No.: ZA-2018-2453-CU-DB-SPR-1A
CEQA No.: ENV-2018-2454-CE
Incidental Cases: None
Related Cases: VTT-82114
Council No.: 9 – Price
Plan Area: South Los Angeles West
Specific Plan: North University Park –
Exposition Park –West
Adams Neighborhood
Stabilization Overlay
Certified NC: Empowerment Congress
North Area
GPLU: Low Medium II Residential
Zone: RD1.5-1-O
Applicant/Owner: Robert Champion,
Representative: Champion Real Estate
Company
Kyndra Casper, DLA Piper
LLP
Appellants: 1. Jim Childs, North
University Park
Community Association
2. Robert Champion

PROJECT LOCATION: 758 – 832 West Adams Boulevard & 2610 South Severance Street

PROPOSED PROJECT: The project would demolish the existing on-site building and parking lot and construct a total of 102 residential units consisting of 100 five-bedroom units and two three-bedroom units within six, three-story buildings over a single-level podium parking structure, totaling four stories. Five of the apartment units would be restricted affordable units for Very Low Income households and the two three-bedroom units would be restricted Workforce Housing. An additional four-story building would provide a clubhouse that would include a variety of resident-serving amenities. In total, the project would construct 185,985 square feet of new floor area. The project provides a total of 30,535 square feet of on-site open space. The seven buildings would sit on a fully enclosed and screened single-level, ground-floor parking structure providing a total of 255 vehicle parking spaces for off-street parking and 220 bicycle parking spaces. A total of 19 on-site, non-protected trees will be removed as a result of the project.

APPEAL ACTION:

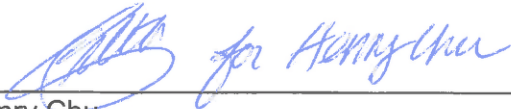
1. Appeal of the Zoning Administrator's determination to approve: 1) a Conditional Use to permit 99 dwelling units, each containing more than five habitable rooms, within the North University Park – Exposition Park – West Adams Neighborhood Stabilization Overlay and; 2) a 20 percent Density Bonus with five (5) percent of the base number of dwelling units set aside for Very Low Income Households, requesting one (1) On-Menu Incentive.
2. Appeal of the project's environmental clearance determining that based on the whole of the administrative record, that the Project is exempt from CEQA pursuant to CEQA Guidelines Section 15332 (Class 32), and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies

3. Appeal of the Zoning Administrator's determination to deny a Site Plan Review for a development which creates or results in an increase of 50 or more dwelling units.

RECOMMENDED ACTIONS:

1. **Determine** that based on the whole of the administrative record, the project is exempt from CEQA pursuant to CEQA Guidelines, Section 15332, and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies;
2. **Deny** the appeal filed by Jim Childs and SUSTAIN the decision of the Zoning Administrator to APPROVE a Conditional Use to permit 102 dwelling units, 99 of which contain more than five habitable rooms, within the North University Park – Exposition Park – West Adams Neighborhood Stabilization Overlay and a 22.5 percent Density Bonus with six percent of the base number of dwelling units set aside for Very Low Income Households, requesting one On-Menu Incentive;
3. **Grant** the appeal filed by Robert Champion and thereby OVERTURN the decision of the Zoning Administrator dated May 17, 2019 and APPROVE a Site Plan Review for a development which creates or results in an increase of more than 50 dwelling units;
4. **Adopt** the attached Findings; and
5. **Adopt** the attached Conditions of Approval.

VINCENT P. BERTONI, AICP
Director of Planning



Henry Chu
Associate Zoning Administrator



Jordann Turner
City Planner



Nicholas Ayars
City Planning Associate

ADVICE TO PUBLIC: *The exact time this report will be considered during the meeting is uncertain since there may be several other items on the agenda. Written communications may be mailed to the City Planning Commission Secretariat, 200 North Spring Street, Room 272, Los Angeles, CA 90012 (Phone No. 213-978-1300). While all written communications are given to the Commission for consideration, the initial packets are sent to the week prior to the Commission's meeting date. If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendaized herein, or in written correspondence on these matters delivered to this agency at or prior to the public hearing. As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability, and upon request, will provide reasonable accommodation to ensure equal access to this programs, services and activities. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request not later than three working days (72 hours) prior to the meeting by calling the Commission Secretariat at (213) 978-1300.

TABLE OF CONTENTS

Project Analysis.....	A-1
------------------------------	------------

- Project Summary
- Appeal Analysis
- Conclusion

Conditions of Approval.....	C-1
------------------------------------	------------

Findings	F-1
-----------------------	------------

Exhibits:

Exhibits:

- Exhibit A – Original Plans
- Exhibit B – Revised Plans
- Exhibit C – Letter of Determination for ZA-2018-2453-CU-DB-SPR
- Exhibit D – Jim Childs Appeal Application
- Exhibit E – Robert Champion Appeal Application
- Exhibit F – CEQA Clearance (ENV-2018-2454-CE) and Supplemental Memorandum
- Exhibit G – Radius and Vicinity Maps
- Exhibit H – Public Correspondence

PROJECT ANALYSIS

PROJECT SUMMARY

The proposed project would demolish the existing on-site building and parking lot and construct a 102 unit residential development consisting of 100 five-bedroom apartment units and two three-bedroom apartment units within six, three-story buildings over a single-level podium parking structure, totaling four stories. Five of the apartment units would be restricted affordable units for Very Low Income households and the two three-bedroom units would be restricted Workforce Housing. An additional four-story building would provide a clubhouse that would include a variety of resident-serving amenities. In total, the project would construct 185,985 square feet of new floor area. The project provides a total of 30,535 square feet of on-site open space. The seven buildings would sit on a fully enclosed and screened single-level, ground-floor parking structure providing a total of 255 vehicle parking spaces for off-street parking and 220 bicycle parking spaces. A total of 19 on-site, non-protected trees will be removed as a result of the project.

As originally proposed, and as acted on by the Zoning Administrator on May 17, 2019, the project proposed the demolition of the existing on-site building and parking lot and the construction of 99 residential units within six, three-story buildings over a single-level podium parking structure, totaling four stories. Five of the apartment units would be restricted affordable units for Very Low Income households. An additional four-story building would provide a clubhouse that would include a variety of resident-serving amenities. In total, the project would construct 183,150 square feet of new floor area. The seven buildings would sit on a fully enclosed and screened single-level, ground-floor parking structure providing a total of 259 vehicle parking spaces for off-street parking and 109 bicycle parking spaces.

	Original Project	Revised Project
Total Units	99 (20% Density Bonus)	102 (22.5% Density Bonus)
Affordable Units	5 Very Low Income	5 Very Low Income, 2 Workforce
Total Floor Area (FAR)	183,185 square feet (1.72:1)	185,985 square feet(1.75:1)
Open Space	29,750 square feet	30,535 square feet
Vehicle Parking	259	255
Bicycle Parking	109	220

Table 1 – Project Comparison

Two appeals were filed challenging the Zoning Administrator's determination. The first, filed by Jim Childs of the North University Park Community Association. The second appeal, filed by the applicant, Robert Champion, 806 West Adams Property, LLC, challenges the Zoning Administrator's determination to deny a Site Plan Review for a development which creates or results in an increase of 50 or more dwelling units.

Subsequent to the filing of the appeals, the applicant submitted revised plans dated July 16, 2019 which made several alterations to the proposed project in order to address the concerns stated by the Zoning Administrator in the findings for Case No. ZA-2018-2453-CU-DB-SPR. These changes include the addition of three additional apartment units, two of which will be reserved for Workforce Housing (for a total of 102 units), the addition of 111 bicycle parking spaces for a new total of 220 bicycle parking spaces, the modification of the overall architectural design and treatment from a modernist style to a craftsman style, and additional design features to more fully screen the parking podiums from the abutting public right-of-ways. The project would maintain the same height, massing and footprint, with the three additional units provided at the ground level via an internal building reconfiguration. Construction phasing and activities would not change.

APPEAL SCOPE

Two appeals were filed challenging the Zoning Administrator's determination. The first, filed by Jim Childs of the North University Park Community Association, states that the Zoning Administrator erred in his findings and abused his discretionary authority in approving 1) a Conditional Use to permit 99 dwelling units, each containing more than five habitable rooms, within the North University Park – Exposition Park – West Adams Neighborhood Stabilization Overlay; 2) a 20 percent Density Bonus with five (5) percent of the base number of dwelling units set aside for Very Low Income Households, requesting one (1) On-Menu Incentive. The appellant also states that the adopted Categorical Exemptions issued for the project are not legally sufficient to meet the requirements of CEQA in the protection of the environment.

The second appeal, filed by the applicant, Robert Champion, 806 West Adams Property, LLC, challenges the Zoning Administrator's determination to deny a Site Plan Review for a development which creates or results in an increase of 50 or more dwelling units.

BACKGROUND

The proposed project is located at 758 – 832 West Adams Boulevard & 2610 South Severance Street and involves the construction and operation of an urban infill residential development on an approximately 2.8-acre site in the University Park neighborhood of the South Los Angeles Community Plan Area, less than one mile from the University of Southern California (USC) campus. The irregularly-shaped project site is located at the southeast corner of West Adams Boulevard and Severance Street on a block that is also bordered by Figueroa Street to the east, 28th Street to the south, and University Avenue to the southeast.

The project site is zoned RD1.5-1-O (Restricted Density Multiple Dwelling, Height District 1, Oil Drilling Supplemental Use District) in the Los Angeles Municipal Code (LAMC) and designated as Low Medium II Residential in the South Los Angeles Community Plan. The project site is currently occupied by a two-story plaster building used by the University of Southern California as an office, childcare, and classroom facility, as well as a surface parking lot and ornamental trees and landscaping. The project site previously contained a separate two-story office, childcare, and classroom facility that was demolished in 2017 as a separate action that is not part of the currently proposed project. The existing building was constructed in 1971.

Adjacent land uses include a four-story residential building to the west across Severance Street, a three-story residential building to the north across Adams Boulevard, a two-story commercial building on the adjacent property to the east, and two and one-story residential and educational buildings to the south owned by the University of Southern California. Transit bus service is provided along Washington Boulevard, 23rd Street, Adams Boulevard, Jefferson Boulevard, Figueroa Street, Flower Street, Vermont Avenue, and Hoover Street within the project site vicinity. Additionally, the project site is located less than 0.5 miles southwest of the Los Angeles County Metropolitan Transportation Authority's (Metro) Expo Line LATTTC/Ortho Institute light rail station, which provides service between downtown Los Angeles and downtown Santa Monica.

After filing an appeal on June 3, 2019, the applicant submitted revised plans dated July 16, 2019 which made several alterations to the proposed project in order to address the concerns stated by the Zoning Administrator in the findings for Case No. ZA-2018-2453-CU-DB-SPR. These changes include the addition of three additional apartment units, two of which will be reserved for Workforce Housing, the addition of 111 bicycle parking spaces for a new total of 220 bicycle parking spaces, the modification of the overall architectural design and treatment from a modernist style to a craftsman style, and additional design features to more fully screen the parking podiums from the abutting public right-of-ways. The project would maintain the same

height, massing and footprint, with the three additional units provided at the ground level via an internal building reconfiguration. Construction phasing and activities would not change.

The revised project would demolish the existing on-site building and parking lot and construct 102 residential units consisting of 100 five-bedroom apartment units and two three-bedroom apartment units within six, three-story buildings over a single-level podium parking structure, totaling four stories. Five of the apartment units would be restricted affordable units for Very Low Income households and the two three-bedroom units would be restricted Workforce Housing. An additional four-story building would provide a clubhouse that would include a variety of resident-serving amenities. In total, the project would construct 185,985 square feet of new floor area. The project provides a total of 30,535 square feet of on-site open space. The seven buildings would sit on a fully enclosed and screened single-level, ground-floor parking structure providing a total of 255 vehicle parking spaces for off-street parking and 220 bicycle parking spaces. A total of 19 on-site, non-protected trees will be removed as a result of the project. Vehicular access to the project site will be provided via a full access driveway (accommodating both right-turn and left-turn ingress/egress movements) located on Severance Street and a restricted access driveway (accommodating only right-turn ingress/egress movements) located on Adams Boulevard.

SURROUNDING PROPERTIES

Adjacent properties include a four-story residential building to the west across Severance Street, a three-story residential building to the north across Adams Boulevard, a two-story commercial building on the adjacent property to the east, and two and one-story residential and educational buildings to the south owned by the University of Southern California.

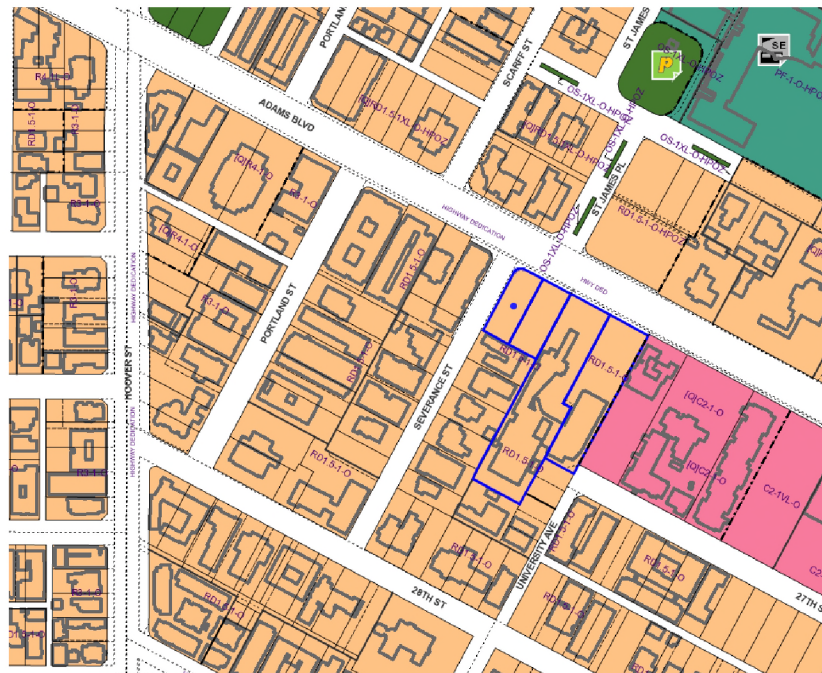


Figure 1. ZIMAS zoning map

STREETS

Adams Boulevard, abutting the project site to the north, is a designated Avenue I, dedicated to a right-of-way width of 100 feet and is fully improved with a parkway, curb, sidewalk, and gutter.

Severance Street, abutting the project site to the west, is a designated Local Street – Standard, dedicated to a right-of-way width of 60 feet and is fully improved with curb, sidewalk, and gutter.

27th Street, abutting the project site to the southeast, is a designated Local Street – Standard, dedicated to a right-of-way width of 60 feet and is fully improved with curb, sidewalk, and gutter.

ENVIRONMENTAL CLEARANCE

The Department of City Planning, on August 30, 2018, issued ENV-2018-2454-CE, and determined that the City of Los Angeles Guidelines for the Implementation of the California Environmental Quality Act designates the subject project as categorically exempt under Article III, Section 1, Class 32. On May 17, 2019 the Zoning Administrator adopted the Categorical Exemption as part of the determination for ZA-2018-2453-CU-DB-SPR

On July 16, 2019, the applicant submitted revised plans that made slight changes to the original project description. Along with these plans, the applicant submitted Supplemental Environmental Analysis prepared by ICF, assessed the potential for additional environmental impacts resulting from the addition of three dwelling units and 11 bedrooms to the proposed project and determined that the project revisions would not alter the conclusions presented in the Class 32 Categorical Exemption issued by the Department of City Planning. Thus, the Project as revised still qualifies for a Class 32 Categorical Exemption from review under the California Environmental Quality Act (CEQA). This memorandum as well as ENV-2018-2454-CE are contained in Exhibit F of this report.

PUBLIC CORRESPONDENCES

Public correspondences prior to the Zoning Administrator hearing and the during the advisement period were submitted by the following:

- December 17, 2018, email from Jim Robinson
- December 18, 2018, emails from Leonard Schulze, Ann Dor
- December 18, 2018, letter from Jim Childs, Adams Dockweiler Heritage Organizing Committee
- December 19, 2018, letters from North University Park Community Association, North Area Neighborhood Development Council, West Adams Heritage Association
- December 19, 2018, emails from Laura Meyers, David Raposa of City Living Realty, Patsy Carter, Sarah Bottjer,
- January 8, 2019, letter from Councilmember Curren D. Price, Jr.
- January 10, 2019, letter from Peter Songster of the University of Southern California, Real Estate & Asset Management

DECISION AND APPEAL

On May 17, 2019, the Zoning Administrator issued a Determination that approved a Conditional Use to permit 99 dwelling units, each containing more than five habitable rooms, within the North University Park – Exposition Park – West Adams Neighborhood Stabilization Overlay and a 20 percent Density Bonus with five (5) percent of the base number of dwelling units set aside for Very Low Income Households, requesting one (1) On-Menu Incentive, and denied to deny a Site Plan Review for a development which creates or results in an increase of 50 or more dwelling units.

On May 29, 2019, an appeal was filed by Jim Childs of the North University Park Community Association. On June 3, 2019, a second appeal was filed by the applicant.

APPEAL ANALYSIS

APPEAL 1 (Jim Childs, North University Park Community Association)

Staff recommends that the City Planning Commission deny the submitted appeal and sustain the Zoning Administrator's approval of a Conditional Use to permit 99 dwelling units, each containing more than five habitable rooms, within the North University Park – Exposition Park – West Adams Neighborhood Stabilization Overlay and a 20 percent Density Bonus with five (5) percent of the base number of dwelling units set aside for Very Low Income Households, requesting one (1) On-Menu Incentive.

The following statements are summarized from the appeals submitted by the appellant. The appeal in its entirety is attached for reference (see Exhibit D). The main appeal points raised were related to following: 1) Density Bonus findings; 2) Conditional Use Findings; and 3) CEQA – eligibility for a Class 32 Categorical Exemption.

1) The Density Bonus Findings Cannot Be Made**Appeal point**

"The Director erred in approving a density bonus when: There is substantial evidence in the record the proposed project, and thus the requested incentive, will have a specific adverse impact on the physical environment, on public health and safety or the physical environment, or on any Historic Resource. There is substantial evidence in the record provided by a wide array of voices that provide expert testimony and analysis that the project as proposed will have specific adverse impacts; given these impacts, no density bonus should be approved."

Staff Response

The appellant contends that the project's immediate proximity to designated historic districts and the University Park Historic Preservation Overlay Zone will result in physical impacts on a Historic Resource.

There is no substantial evidence that the proposed incentive(s) / waiver(s) will have a specific adverse impact. A "specific adverse impact" is defined as, "a significant, quantifiable, direct and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete" (LAMC Section 12.22.A.25(b)). The appellant's primary argument of the project creating a significant adverse impact focuses on his assertion that the City could not make the required findings because the project is in the general vicinity of various historic resources. A Historic Resource Evaluation report prepared by Historic Resources Group, recognized architectural historians, and reviewed and deemed appropriate by the Office of Historic Resources has provided the City of Los Angeles, the lead agency, substantial evidence to determine that the subject property is not an existing or potential historic resource, nor is it located within an existing or potential historic district. The project site is not located within the University Park Historic Preservation Overlay Zone, nor is it located in a local, state, or federally designated historic district.

Consequently, the project opponent has provided no technical or quantifiable evidence establishing a significant, quantifiable, direct and unavoidable impact upon public health and safety or the physical environment, and does not identify how any objective written public health and safety standards have been exceeded or violated. Consequently, there is no substantial evidence to support a denial of the incentives on these grounds.

2) Conditional Use Permit

Appeal points.

- The project will not enhance the built environment in the surrounding neighborhood nor perform a function nor provide a service that is beneficial to the community, city or region nor can the calculation that the project will increase the supply of off-street parking by 259 spaces be tallied as a benefit when it is adding approximately 990 new tenants, most of whom have cars nor does the project contribute to the needed supply of housing because this is not family, faculty nor affordable housing. The claim that it will provide housing is simply not supportable by the facts. These are dormitories.
- The finding cannot be made that this project conforms to the South Los Angeles Community Plan nor the Redevelopment plan.
- This Project should respect the pattern of development AND the Scenic Highway designation and point its face toward Adams Boulevard.
- There are detrimental concentrations of large scale, campus serving housing within a 1,000 foot radius of the project.

Staff response**Built Environment/Parking/Housing Supply**

The appellant contends that the required Conditional Use findings cannot be made as it “will not enhance the built environment in the surrounding neighborhood nor perform a function nor provide a service that is beneficial to the community, city, or region, nor can the calculation that the project will increase the supply of off-street parking by 259 spaces” be tallied as a benefit when it is adding approximately 990 new tenants, most of whom have cars.”

The project would demolish the existing on-site building and parking lot and construct 100 five-bedroom apartment units and two three-bedroom apartment units within six, three-story buildings over a single-level podium parking structure, totaling four stories. Five of the apartment units would be restricted affordable units for Very Low Income households and the two three-bedroom units would be restricted Workforce Housing. An additional four-story building would provide a clubhouse that would include a variety of resident-serving amenities. In total, the project would construct 185,985 square feet of new floor area. The project provides a total of 30,535 square feet of on-site open space. The seven buildings would sit on a fully enclosed and screened single-level, ground-floor parking structure providing a total of 255 vehicle parking spaces for off-street parking and 220 bicycle parking spaces.

The project site is currently occupied by a two-story plaster building used by the University of Southern California as an office, childcare, and classroom facility, as well as a surface parking lot and ornamental trees and landscaping. The project site previously contained a separate two-story office, childcare, and classroom facility that was demolished in 2017 as a separate action that is not part of the currently proposed project. The existing building was constructed in 1971. The proposed project replaces old structures that show signs of deferred maintenance. The project includes architectural, landscaping, and site design features meant to enhance the built environment along Adams Boulevard and Severance Street.

In regards to housing supply, the appellant contends that “the project does not contribute to the needed supply of housing because this is not family, faculty, nor affordable housing.”

As previously stated, the project will reserve five of the total units for Very Low Income Households, while two units will be reserved for Work Force housing. All seven of these units

can be considered affordable housing. Furthermore, the 95 market-rate apartments are not restricted only to students. The appellant has not submitted any substantial evidence to the contrary.

Community Plan and Redevelopment Plan Consistency

The appellant contends that the development project is not consistent with expressed goals and policies of the South Los Angeles Community Plan and Exposition/University Park Redevelopment Project to conserve the varied and distinctive residential character of the Plan area.

In regards to the consistency with the South Los Angeles Community Plan, in approving the Conditional Use, the Zoning Administrator reviewed the tract map for its consistency with the General Plan. The Land Use Element of the General Plan consists of the 35 Community Plans within the City of Los Angeles. The project site is located within the South Los Angeles Community Plan, which establishes goals, objectives, and policies for future developments at a neighborhood level. Additionally, through the Land Use Map, the Community Plan designates parcels with a land use designation and corresponding zone. While the Community Plan establishes goals, objectives, and policies throughout the Plan's text, the Zoning Code is "the principal method for the implementation of the Land Use Map."¹ The Zoning Code regulates, but is not limited to the maximum permitted density, height, and the subdivision of land.

The adopted South Los Angeles Community Plan designates the property for Low Medium II Residential land uses with a corresponding zone of RD1.5. The Low Medium II Residential land use designation and the RD1.5-1-O Zone requires a minimum area of 1,500 square feet per dwelling unit, establishing a base maximum density of 83 units for the project site (124,257 / 1,500). With the allowable 22.5 percent density bonus, a maximum of 102 dwelling units are allowed on the project site. The project proposes 102 dwelling units and is therefore consistent with the maximum density restriction applicable to the project site under the LAMC. The Project would have a Floor Area Ratio (FAR) of 1:75 (185,985 square feet) and is therefore consistent with the project site's maximum FAR restriction under the L.A.M.C. of 3:1 (319,362 square feet). Height District 1 allows a maximum height of 45 feet in the RD1.5 zone. The project would have a maximum height of 45 feet and is therefore consistent with the maximum height restriction. As proposed, the building footprints and envelopes are consistent with the applicable requirements of the underlying zone.

The General Plan designation in the South Los Angeles Community Plan for the project site is Low Medium II Residential, which is consistent with the project site's RD1.5 zoning and promotes multi-family residential uses such as the Project at densities and scales consistent with the Project, as set forth herein. The South Los Angeles Community Plan identified goals, objectives, policies, and programs to guide development in the community plan area, including residential projects. The Project satisfies the applicable goals, objectives, and policies of the South Los Angeles Community Plan including locating higher residential densities near commercial centers, transit stations, and bus routes (Policy 1-2.1), providing for the clustering of housing units to help decrease the cost of land per unit (Policy 1-5.4), and requiring that proposed development be designed to enhance and be compatible with adjacent development (Policy 1-6.4).

Therefore, as conditioned, the design and improvement of the proposed subdivision is consistent with the intent and purpose of the applicable General and Specific Plans.

¹ Page II-3 of the South Los Angeles Community Plan.

In regards to consistency with the Redevelopment Plan, while the project site is subject to the Exposition/University Park Redevelopment Plan, under the State and City Density Bonus provisions, projects that request and qualify for a Density Bonus base the bonus on the zoning code or general plan density, not on a redevelopment plan.

Scenic Highway

The appellant contends that since it is a City designated Scenic Highway, Adams Boulevard “deserves special treatment in the handling of setbacks.” They also state that “there should not be a visible parking garage and/or podium on Adams Boulevard” as this “violates every design guideline.”

Adams Boulevard is identified in the City of Los Angeles Mobility Plan 2035 as a Scenic Highway and is subject to the Scenic Highway Guidelines contained in Appendix B of the Mobility Plan. These guidelines identify the following five factors related to the maintenance of identified Scenic Highways: (1) Roadway Design and Alignment; (2) Parkway Planting/Landscaping; (3) Signs/ Outdoor Advertising Restrictions ; (4) Utilities (e.g. undergrounding of new or relocated utility facilities); (5) Opportunity for Enhanced Non-Motorized Circulation. Consistent with these requirements, the project will not affect the design or alignment of West Adams Boulevard, the earthwork/grading, planting/landscaping and utilities work required for the project will not alter the Adams Boulevard parkway and trees, and as a residential project, the project will not contain any outdoor advertising. Additionally, contrary to the appellant's contention, as shown in the revised plans, no podium parking is visible along the project's frontage along Adams Boulevard. The entirety of parking podium is fully screened and the setback is fully landscaped. The revised elevations and renderings show the portion of the project facing Adams Boulevard is fully articulated and includes two pedestrian entrances and well as one driveway entrance. Therefore, the project is not inconsistent with the Scenic Highway Guidelines or Citywide Design Guidelines.

Concentration of Large Scale, Campus Serving Housing

The appellant contends that the project site is located in an area with a detrimental concentration of large scale, campus serving housing.

While the property is located in close proximity to the University of Southern California and apartment buildings in the area that advertise to a student population, no concentration of large scale campus serving housing was found within the radius. There are a number of low and medium scale apartment buildings in the vicinity, including the fraternity and sorority houses located along USC's Greek Row, however, there is only one medium scale campus housing serving University of Southern California (“USC”) within 1,000 feet of the project: Troy East. University Village and University Gateway Apartments are located outside the 1,000 foot radius. Existing campus serving housing uses are not intensive, high-density uses, but are rather low and medium density uses consistent with surrounding General Plan and zoning designations. Therefore, there is a substantial basis to conclude there is no detrimental concentration of student housing within 1,000 feet of the Project Site.

3. CEQA

Appeal Points:

- A categorical exemption is not the appropriate level of environmental review for a project that is highly discretionary, is in a historically sensitive environmental, located on a scenic highway, and fails to meet objectives of the community plan and redevelopment plan.

- A Categorical Exemption should not be issued when there are unusual circumstances creating the reasonable possibility of significant effects. The project may result in damage to scenic resources, including, but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within an officially designated scenic highway.
- A categorical exemption should not be issued when there are sensitive issues and the project fails to comply with the redevelopment plan and the south community stated objectives. To permit a CE in this case would cause irreparable and irreversible harm to the environment.

Staff Response

CEQA

On August 30, 2018, the Department of City Planning determined the proposed project to be exempt from CEQA as the project was found to meet the conditions required for a Class 32 Categorical Exemption (In-Fill Development Projects) and issued a Notice of Exemption for ENV-2018-2454-CE. Specifically, the project was found a) to be consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations; b) occur within city limits on a project site of no more than five acres substantially surrounded by urban uses; c) located on a site has no value as habitat for endangered, rare or threatened species; d) would not result in any significant effects relating to traffic, noise, air quality, or water quality; and e) can be adequately served by all required utilities and public services. In addition, there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies. Further discussion on how the project meets the conditions of the Class 32 Categorical Exemption can be found in Exhibit E. The appellant has not submitted any substantial evidence that the project will result in a significant environmental impact. Furthermore, This determination is supported by substantial evidence in the record, including technical reports on the project's potential impacts on air quality, noise, historic resources, and a traffic study approved by LADOT, all of which support the conclusion that the project would not cause significant environmental impacts.

Historic Resources

The project is not within a Historic Preservation Overlay Zone. The subject property is comprised of four lots at 758 – 832 West Adams Boulevard and 2610 South Severance Street. The project site is currently occupied by a two-story plaster building used by the University of Southern California as an office, childcare, and classroom facility, as well as a surface parking lot and ornamental trees and landscaping. The project site previously contained a separate two-story office, childcare, and classroom facility that was demolished in 2017 as a separate action that is not part of the currently proposed project. The existing building was constructed in 1971. None of the existing structures on the project site are designated as historic cultural monuments and the project site is not located within a Historic Preservation Overlay Zone. Furthermore, a historic resource evaluation, dated June 14, 2018, was conducted by the Historic Resources Group that reviewed the existing buildings and determined that, based on visual observation, research of primary and secondary sources, and an analysis of established eligibility criteria, the existing onsite building is not eligible for historic designation at the local, state, or national level. Furthermore, while Adams Avenue is locally designated by the City of Los Angeles Mobility Plan 2035 as a Scenic Highway, it is not located on or near a portion of eligible and/or officially designated state or county scenic highway.

APPEAL 2 (Robert Champion, 806 West Adams Property, LLC)

Staff recommends that the City Planning Commission grant the submitted appeal and overturn the Zoning Administrator's determination to deny a Site Plan Review for a development which creates or results in an increase of 50 or more dwelling units. The Zoning Administrator states that the Site Plan Review was not denied in error, as the appellant contends, rather the Zoning Administrator supports sustaining the appeal as the revised project plans fully address their concerns regarding project's physical compatibility with the existing neighborhood.

With revisions to the project, the Zoning Administrator believes the project would now be compatible with surrounding uses. The project removes the appearance of the above grade parking podium and the metal screens along the majority of the east elevation, as shown in the plans marked "Exhibit A" of the 2019 Zoning Administrator determination dated May 17, 2019. The revision and the removal of the metal screens and integrating the ground floor with the residential uses above allow for the subject building to transition well to the public rights-of-way through landscaping. The appearance of a walled off ground level as stated in the Zoning Administrator determination, have been removed in the revised plans, and exhibits improved interaction with the public right-of-way and enhanced landscaping.

CONCLUSION

For the reasons stated herein, and in the findings of the Zoning Administrator's Determination, the proposed project as redesigned does comply with the applicable provisions of the Density Bonus, Conditional Use, Neighborhood Stabilization Overlay, and Site Plan Review and the California Environmental Quality Act (CEQA). Planning staff evaluated the proposed project and determined it meets the Density Bonus, Conditional Use, Neighborhood Stabilization Overlay, and Site Plan Review requirements and that the project qualifies for a Class 32 Categorical Exemption. Based on the complete plans submitted by the applicant and considering the appellant's arguments for appeal, staff has determined that the project meets the required findings.

Therefore, staff recommends that the City Planning Commission take the following actions: determine that based on the whole of the administrative record, the project is exempt from CEQA pursuant to CEQA Guidelines, Section 15332, and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies, deny the appeal filed by Jim Childs and sustain the decision of the Zoning Administrator to approve a Conditional Use to permit 102 dwelling units, 99 of which contain more than five habitable rooms, within the North University Park – Exposition Park – West Adams Neighborhood Stabilization Overlay and a 22.5 percent Density Bonus with six percent of the base number of dwelling units set aside for Very Low Income Households, requesting one On-Menu Incentive; grant the appeal filed by Robert Champion and overturn the decision of the Zoning Administrator dated May 17, 2019, thereby approving a Site Plan Review for a development which creates or results in an increase of more than 50 dwelling units; adopt the attached Findings, and adopt the attached Conditions of Approval.

CONDITIONS OF APPROVAL

Pursuant to Sections 12.22-A.25, 12.24-W.52, and 16.05 of the Los Angeles Municipal Code, the following conditions are hereby imposed upon the use of the subject property:

1. All other use, height and area regulations of the Municipal Code and all other applicable government/regulatory agencies shall be strictly complied with in the development and use of the property, except as such regulations are herein specifically varied or required.
2. The use and development of the property shall be in substantial conformance with the plot plan submitted with the application and marked Exhibit "A", except as may be revised as a result of this action.
3. The authorized use shall be conducted at all times with due regard for the character of the surrounding district, and the right is reserved to the Zoning Administrator to impose additional corrective Conditions, if, in the Administrator's opinion, such Conditions are proven necessary for the protection of persons in the neighborhood or occupants of adjacent property.
4. All graffiti on the site shall be removed or painted over to match the color of the surface to which it is applied within 24 hours of its occurrence.
5. A copy of the first page of this grant and all Conditions and/or any subsequent appeal of this grant and its resultant Conditions and/or letters of clarification shall be printed on the building plans submitted to the Development Services Center and the Department of Building and Safety for purposes of having a building permit issued.
6. Walk-in closets shall not be converted into additional habitable rooms. The project shall comply with the applicable provisions of the North University Park – Exposition Park – West Adams Neighborhood Stabilization Overlay Zone at all times.
7. The total area of signage pertaining to the prospective rental or sale of the property shall not exceed 12 square feet on any lot, as provided in Section 12.21-A,7 of the Los Angeles Municipal Code.
8. Fences and walls, inclusive of storm water planter boxes, shall not exceed a height of 3 feet 6 inches within the required front yard, as provided in Section 12.22-C,20 of the Los Angeles Municipal Code. Over-in-height hedges shall constitute a violation of this regulation.

DENSITY BONUS (Condition Nos. 9 - 14)

9. **Residential Density.** The project shall be limited to a maximum density of 102 residential units including Density Bonus Units.
10. **Affordable Units.** (a) A minimum of 6% of the site's base number of units shall be reserved as affordable units for Very Low Income Households, as defined by the State Density Bonus Law 65915(C)(2). (b) In addition to the affordable units required under the Density Bonus program, the project shall also provide an additional 2 units for Workforce Housing occupancy pursuant to HCIDLA Land Use Rent Income Schedule 1, which shall be provided as 3 bedroom units to be located adjacent to one another at the project's ground floor level, as identified in Exhibit A.

11. **Changes in Restricted Units.** Deviations that increase the number of restricted affordable units or that change the composition of units or change parking numbers shall be consistent with L.A.M.C. Section 12.22-A,25.
12. **Housing Requirements.** Prior to issuance of a building permit, the owner shall execute a covenant to the satisfaction of the Los Angeles Housing and Community Investment Department (HCIDLA) to make 6% of the site's base density units available to Very-Low Income Households, for sale or rental as determined to be affordable to such households by HCIDLA for a period of 55 years. Enforcement of the terms of said covenant shall be the responsibility of HCIDLA. The applicant will present a copy of the recorded covenant to the Department of City Planning for inclusion in this file. The project shall comply with the Guidelines for the Affordable Housing Incentives Program adopted by the City Planning Commission and with any monitoring requirements established by the HCIDLA, except the project's two (2) Workforce Housing occupancy units shall be provided as adjacent 3 bedroom units as stated above, and therefore shall not be subject to any conflicting design, proportionality, or dispersion requirements of the Guidelines for the Affordable Housing Incentives Program or any other city policy or practice. Refer to the Density Bonus Legislation Background section of this determination.
13. **Adjustment of Parking.** In the event that the number of Restricted Affordable Units should increase, or the composition of such units should change (i.e. the number of bedrooms, or the number of units made available to Senior Citizens and/or Disabled Persons), or the applicant selects another Parking Option (including Bicycle Parking Ordinance) and no other Condition of Approval or incentive is affected, then no modification of this determination shall be necessary, and the number of parking spaces shall be re-calculated by the Department of Building and Safety based upon the ratios set forth pursuant to L.A.M.C. Section 12.22-A,25.
14. **Density Bonus Waivers/Incentives.**
 - a. **Setback (Rear Yard).** The building shall be permitted a 20 percent decrease in the required rear yard to allow 12 feet in lieu of the minimum 15 feet required in the RD1.5-1-O Zone.

SITE PLAN REVIEW (Condition Nos. 15 - 20)

15. Approved herein is the construction, use and maintenance of seven buildings containing a maximum combined floor area of 185,985 square feet, mixed-use building with maximum height of 45 feet above grade, containing a maximum of 102 residential units.
16. **Electric Vehicle Parking.** The project shall include at least 20 percent of the total provided parking spaces capable of supporting future electric vehicle supply equipment (EVSE). Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating ampacity. Of the twenty percent EV Ready parking, five (5) percent of the total provided parking spaces shall be further provided with EV chargers to immediately accommodate electric vehicles within the parking areas. When the application of either the required 20 percent or five percent results in a fractional space, round up to the next whole number. A label stating "EVCAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

17. **Solar Panels.** Solar panels shall be installed on the project's rooftop space to be connected to the building's electrical system. A minimum 15% of the roof area shall be reserved for the installation of a solar photovoltaic system, to be installed prior to the issuance of a certificate of occupancy, in substantial conformance with the plans stamped "Exhibit A".
18. **Landscape Plan.**
 - a. All planters containing trees shall have a minimum depth of 48 inches (48"), including those located on the rooftop and at the ground level.
 - b. All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped, including an automatic irrigation system, and maintained in accordance with a landscape plan prepared by a licensed landscape architect or licensed architect, and submitted for approval to the Department of City Planning.
19. **Trash and Recycling.**
 - a. All trash collection and storage areas shall be located on-site and shall not be visible from the public right-of-way.
 - b. Trash receptacles shall be stored in a fully enclosed building or structure, constructed with a solid roof, at all times.
 - c. Trash/recycling containers shall be locked when not in use.
20. **Rooftop Equipment.** Any structures on the roof, such as air conditioning units and other equipment, shall be fully screened from view of any abutting properties and the public right-of-way. All screening shall be setback at least five (5) feet from the edge of the building.

ADMINISTRATIVE CONDITIONS

21. Prior to the issuance of any permits relative to this matter, a covenant acknowledging and agreeing to comply with all the terms and conditions established herein shall be recorded in the County Recorder's Office. The agreement (standard master covenant and agreement form CP-6770) shall run with the land and shall be binding on any subsequent owners, heirs or assigns. The agreement with the conditions attached must be submitted to the Development Services Center for approval before being recorded. After recordation, a certified copy bearing the Recorder's number and date shall be provided to the Zoning Administrator for attachment to the subject case file.
22. Prior to the clearance of any conditions, the applicant shall show proof that all fees have been paid to the Department of City Planning, Expedited Processing Section.
23. **INDEMNIFICATION AND REIMBURSEMENT OF LITIGATION COSTS.**

Applicant shall do all of the following:

- (i) Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void or otherwise modify or annul the approval of the

entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions or to claim personal property damage, including from inverse condemnation or any other constitutional claim.

- (ii) Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages and/or settlement costs.
- (iii) Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than \$50,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (b).
- (iv) Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement (b).
- (v) If the City determines it necessary to protect the City's interests, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the Applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

For purposes of this condition, the following definitions apply:

"City" shall be defined to include the City, its agents, officers, boards, commission, committees, employees and volunteers.

"Action" shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims or lawsuits. Actions includes actions, as defined herein, alleging failure to comply with any federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the Applicant otherwise created by this condition.

FINDINGS

Density Bonus/Affordable Housing Incentives Compliance Findings

Pursuant to Section 12.22-A,25(g) of the L.A.M.C., the Director shall approve a density bonus and requested incentive(s) unless the director finds that:

1. **Pursuant to Section 12.22-A,25(g) of the L.A.M.C., the Director shall approve a density bonus and requested incentive(s) unless the director finds that:**

- a. *The incentives are not required to provide for affordable housing costs as defined in California Health and Safety Code Section 50052.5 or Section 50053 for rents for the affordable units.*

The record does not contain substantial evidence that would allow the Director to make a finding that the requested incentives are not necessary to provide for affordable housing costs per State Law. The California Health & Safety Code Sections 50052.5 and 50053 define formulas for calculating affordable housing costs for very low, low, and moderate income households. Section 50052.5 addresses owner-occupied housing and Section 50053 addresses rental households. Affordable housing costs are a calculation of residential rent or ownership pricing not to exceed 25 percent gross income based on area median income thresholds dependent on affordability levels.

The list of On-Menu Incentives in Section 12.22-A,25 of the L.A.M.C. were pre-evaluated at the time the Density Bonus Ordinance was adopted to include types of relief that minimize restrictions on the size of the project. As such, the Director will always arrive at the conclusion that the Density Bonus On-Menu Incentives are required to provide for affordable housing costs since the incentives by their nature increase the scale of the project.

Setback (Rear Yard). The requested yard incentives, allowing a 20 percent reduction to the permitted rear and side yards, are expressed in the Menu of Incentives per L.A.M.C. 12.22 A.25(f) and, as such, permit exceptions to zoning requirements that result in building design or construction efficiencies that facilitate affordable housing costs. The requested incentives allow the applicant to reduce setback requirements so the affordable housing units reserved for Very Low Income Households can be constructed and the overall space dedicated to residential uses is increased. These incentives support the applicant's decision to reserve five (5) units as affordable housing units reserved for Very Low Income Households.

- b. *The Incentive will have a specific adverse impact upon public health and safety or the physical environment, or on any real property that is listed in the California Register of Historical Resources and for which there are no feasible methods to satisfactorily mitigate or avoid the specific adverse Impact without rendering the development unaffordable to Very Low, Low and Moderate Income households. Inconsistency with the zoning ordinance or the general plan land use designation shall not constitute a specific, adverse impact upon the public health or safety.*

There is no evidence that the proposed incentive will have a specific adverse impact upon public health and safety or the physical environment, or any real property that is listed in the California Register of Historical Resources. A "specific adverse impact" is defined as "a significant, quantifiable, direct and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions

as they existed on the date the application was deemed complete" (LAMC Section 12.22-A,25(b)). The project does not involve a contributing structure in a designated Historic Preservation Overlay Zone or on the City of Los Angeles list of Historical-Cultural Monuments. According to ZIMAS, the project is not located on a substandard street in a Hillside area or a Very High Fire Hazard Severity Zone. Therefore, there is no substantial evidence that the proposed project, and thus the requested incentive, will have a specific adverse impact on the physical environment, on public health and safety or the physical environment, or on any Historical Resource.

BASIS FOR CONDITIONAL USE PERMITS

A particular type of development is subject to the conditional use process because it has been determined that such use of property should not be permitted by right in a particular zone. All uses requiring a conditional use permit from the Zoning Administrator are located within Section 12.24-W of the Los Angeles Municipal Code. In order for the conditional use to be authorized, certain designated findings have to be made. In these cases, there are additional findings in lieu of the standard findings for most other conditional use categories.

2. **The project will enhance the built environment in the surrounding neighborhood or will perform a function or provide a service that is essential or beneficial to the community, city or region.**

The project will contribute to the needed supply of housing in the neighborhood, while also increasing the supply of off-street parking in the area by 255 spaces. No deviations from the zoning code have been requested herein. The proposed height, floor area, and density are all permitted without any deviations from the Code and do not require any relief from zoning regulations. The project was revised to reduce the number of stories from four levels above a garage at ground level to three levels above a garage at ground level. The project modified height and square footage, and was redesigned with the intent of having it more compatible features to surrounding homes. For example, the original design was a modern style, whereas the revised design brought in a more traditional design elements that included balconies, façade articulation, eaves, and others to complement neighboring homes that have been built with the different architectural styles, including craftsman, prevalent in the area.

The project site is currently occupied by a two-story plaster building used by the University of Southern California as an office, childcare, and classroom facility, as well as a surface parking lot and ornamental trees and landscaping. The project site previously contained a separate two-story office, childcare, and classroom facility that was demolished in 2017 as a separate action that is not part of the currently proposed project. The existing building was constructed in 1971.

The proposed development replaces old structures that show signs of deferred maintenance. Additionally, the project adds to the housing supply to address the demand for housing in the City. The development will meet the housing needs and be beneficial to the community, city and region.

3. **The project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare and safety.**

The subject site is comprised of approximately 2.8 acres of lot area and zoned RD2-1 with a Low Medium II Residential land use designation in the South Los Angeles Community Plan. The RD1.5 zone requires a minimum area of 1,500 square feet per dwelling unit,

establishing a base maximum density of 83 units for the project site (124,257 / 1,500). With the allowable 22.5 percent density bonus, a maximum of 102 dwelling units are allowed on the project site. The Project proposes 102 dwelling units and is therefore consistent with the maximum density restriction applicable to the project site under the L.A.M.C.. The Project would have a Floor Area Ratio (FAR) of 1.75:1 (185,985 square feet) after Phase I and Phase II, and is therefore consistent with the project site's maximum FAR restriction under the L.A.M.C. of 3:1 (319,362 square feet). Height District 1 allows a maximum height of 45 feet in the RD1.5 zone. The project would have a maximum height of 45 feet and is therefore consistent with the maximum height restriction.

Property in the surrounding area is classified in the RD1.5-1, [Q]R4-1-O-HPOZ, [Q]C2-1-O, and P-1-O-HPOZ Zones. Adjacent land uses include a four-story residential building to the west across Severance Street, a three-story residential building to the north across Adams Boulevard, a two-story commercial building on the adjacent property to the east, and two and one-story residential and educational buildings to the south owned by the University of Southern California. The proposed residential use is consistent with the mix of residential uses in the area and its zone.

Also, the project will be subject to Regulatory Compliance Measures (RCMs), which require compliance with the City of Los Angeles Noise Ordinance; pollutant discharge, dewatering, stormwater mitigations; and Best Management Practices for stormwater runoff. These RCMs will ensure the project will not have significant impacts on noise and water. The project is beneath the threshold criteria established by LADOT for preparing a traffic study. Therefore, the project will not have any significant impacts to traffic. The project will not result in significant impacts related to air quality because it falls below interim air threshold established by City Planning staff. Interim thresholds were developed by City Planning staff based on CalEEMod model runs relying on reasonable assumptions, consulting with AQMD staff, and surveying published air quality studies for which criteria air pollutants did not exceed the established SCAQMD construction and operational thresholds. The project site will be adequately served by all public utilities and services given that the construction of the development will be on a site which has been previously developed and is consistent with the General Plan. The project will not degrade adjacent uses.

4. The project substantially conforms with the purpose, intent and provisions of the General Plan, the applicable community plan, and any specific plan.

There are twelve elements of the General Plan. Each of these Elements establishes policies that provide for the regulatory environment in managing the City and for addressing environmental concerns and problems. The majority of the policies derived from these Elements are in the form of code requirements of the Los Angeles Municipal Code. Except for those entitlements described herein, the project does not propose to deviate from any of the requirements of the Los Angeles Municipal Code. The Land Use Element of the City's General Plan divides the city into 35 Community Plans. The South Los Angeles Community Plan has designated the site for Low Medium II Residential land uses with the corresponding zones of RD1.5, RD2, RW2, and RZ2.5. The RD1.5-1-O zoning of the site is consistent with the existing land use designation.

The project is located within the South Los Angeles Community Plan Area, which designates the property for Low Medium II Residential land uses with the corresponding zone of RD1.5 and Height District No. 1. The site is also located within the South Los Angeles Alcohol Sales Specific Plan; the project is not affected, as it does not involve the sale of alcoholic beverages for off-site consumption.

The project conforms to the following objectives and policies of the South Los Angeles Community Plan because the proposed use is located within an existing residential neighborhood, results in increased housing supply, and will result in the enhancement of the built environment:

Objective 1-1: "To provide for the preservation of existing housing and for the development of new housing to meet the diverse economic and physical needs of the existing residents and projected population of the Plan area..."

Policy 1-5.1: "Promote greater individual choice in type, quality, price, and location of housing"

Policy 1-5.3: "Provide for development of townhouses and other similar condo type housing units to increase ownership options:

Policy 1-5.4: "Provide for the clustering of housing units to help decrease the effective cost of land per dwelling unit."

The proposed project produces a total of 102 dwelling units and the demolition of a two-story classroom building. It creates new housing for a diverse population, and a net increase of units over existing conditions.

Section 13.12-C,2 of the L.A.M.C. requires that "Any project shall, in addition to complying with the parking requirements of Section 12.21-A(a) of this Code, also provide one additional parking space for each habitable room at or above 5 habitable rooms. Section 12.21-A,4(a) of the Code requires two parking spaces for every unit with more than three habitable rooms. However, L.A.M.C. Section 13.12.C.2 would not apply to the project. The project is providing five Very Low Income affordable housing units and requesting a 22.5 percent density bonus to allow the construction of additional dwelling units at the site. California Government Code Section 65915, subsection (p)(1) provides that were a project provides affordable housing for the required term, a local land use permitting authority is prohibited from imposing parking ratios that exceed 2.5 spaces for dwelling units with four or more bedrooms. The project would construct a total of 102 five-bedroom dwelling units in two phases. A total of 255 on-site parking spaces are required. The project would provide 255 parking spaces once both phases are constructed, which would meets the applicable requirement.

ADDITIONAL FINDINGS FOR NEIGHBORHOOD STABILIZATION OVERLAY PROJECTS

5. The project provides additional on-site parking under Section 13.2-C,2 of this Code.

The project site is located in the North University Park – Exposition Park – West Adams Neighborhood Stabilization Overlay ("NSO"). L.A.M.C. Section 13.12.C.2 requires projects to comply with the parking requirements of L.A.M.C. Section 12.21.A.4(a) and provide additional on-site parking based on the number of habitable rooms within a dwelling unit.

However, as stated in the previous finding, L.A.M.C. Section 13.12.C.2 would not apply to the project. The project provides five Very Low Income affordable housing units (6 percent of the base units) and is requesting a 22.5 percent density bonus to allow the construction of additional dwelling units at the Site. California Government Code Section 65915, subsection (p)(1) provides that were a project provides affordable housing for the required term, a local land use permitting authority is prohibited from imposing parking ratios that exceed 2.5 spaces for dwelling units with four or more bedrooms. The project would construct a total of 102 dwelling units in two phases. A total of 255 on-site parking spaces

are required. The project would provide 255 parking spaces once both phases are constructed, which would meet the applicable requirement.

6. There is no detrimental concentration of large scale, campus serving housing within a 1,000-foot radius of the proposed project.

The development patterns and land uses within a 1,000-foot radius of the subject site were reviewed. While the property is located in close proximity to the University of Southern California) and apartment buildings in the area that advertise to a student population, no concentration of large scale campus serving housing was found within the radius.

While the property is located in close proximity to the University of Southern California and apartment buildings in the area that advertise to a student population, no concentration of large scale campus serving housing was found within the radius. There are a number of low and medium scale apartment buildings in the vicinity, including the fraternity and sorority houses located along USC's Greek Row, however, there is only one medium scale campus housing serving University of Southern California ("USC") within 1,000 feet of the project: Troy East. University Village and University Gateway Apartments are located outside the 1,000 foot radius. Existing campus serving housing uses are not intensive, high-density uses, but are rather low and medium density uses consistent with surrounding General Plan and zoning designations. Therefore, there is a substantial basis to conclude there is no detrimental concentration of student housing within 1,000 feet of the Project Site.

7. The project conforms to any applicable Historic Preservation Overlay Zone (HPOZ) or Specific Plan.

The project is not within a Historic Preservation Overlay Zone. The subject property is comprised of four lots at 758 – 832 West Adams Boulevard and 2610 South Severance Street. The project site is currently occupied by a two-story plaster building used by the University of Southern California as an office, childcare, and classroom facility, as well as a surface parking lot and ornamental trees and landscaping. The project site previously contained a separate two-story office, childcare, and classroom facility that was demolished in 2017 as a separate action that is not part of the currently proposed project. The existing building was constructed in 1971. None of the existing structures on the project site are designated as historic cultural monuments and the project site is not located within a Historic Preservation Overlay Zone. Furthermore, a historic resource evaluation, dated June 14, 2018, was conducted by the Historic Resources Group that reviewed the existing buildings and determined that, based on visual observation, research of primary and secondary sources, and an analysis of established eligibility criteria, the existing onsite building is not eligible for historic designation at the local, state, or national level.

The project site is located within the boundaries of the South Los Angeles Alcohol Sales Specific Plan, which seeks to regulate alcohol sales within the plan area. The project is a residential development on a residentially-zoned site. The project is not affected as it does not involve the sale of alcoholic beverages. Therefore, it is not subject to the regulations of the Specific Plan. The project is not within a Historic Preservation Overlay Zone.

SITE PLAN REVIEW FINDINGS

8. The project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan, and any applicable specific plan.

The project is located within the South Los Angeles Community Plan Area, which designates the property for Low Medium II Residential land uses with the corresponding zone of RD1.5 and Height District No. 1. The site is also located within the South Los Angeles Alcohol Sales Specific Plan; the project is not affected, as it does not involve the sale of alcoholic beverages for off-site consumption.

The project conforms to the following objectives and policies of the South Los Angeles Community Plan because the proposed use is located within an existing residential neighborhood, results in increased housing supply, and will result in the enhancement of the built environment:

Objective 1-1: "To provide for the preservation of existing housing and for the development of new housing to meet the diverse economic and physical needs of the existing residents and projected population of the Plan area..."

Policy 1-5.1: "Promote greater individual choice in type, quality, price, and location of housing"

Policy 1-5.3: "Provide for development of townhouses and other similar condo type housing units to increase ownership options:

Policy 1-5.4: "Provide for the clustering of housing units to help decrease the effective cost of land per dwelling unit."

The proposed project produces a total of 102 dwelling units and the demolition of a two-story classroom building. It creates new housing for a diverse population, and a net increase of units over existing conditions.

Section 13.12-C,2 of the L.A.M.C. requires that "Any project shall, in addition to complying with the parking requirements of Section 12.21-A(a) of this Code, also provide one additional parking space for each habitable room at or above 5 habitable rooms. Section 12.21-A,4(a) of the Code requires two parking spaces for every unit with more than three habitable rooms. However, L.A.M.C. Section 13.12.C.2 would not apply to the Project. The Project is providing five Very Low Income affordable housing units (six percent of base units) and requesting 22.5 percent density bonus to allow the construction of additional dwelling units at the Site. California Government Code Section 65915, subsection (p)(1) provides that were a project provides affordable housing for the required term, a local land use permitting authority is prohibited from imposing parking ratios that exceed 2.5 spaces for dwelling units with four or more bedrooms. The Project would construct a total of 102 dwelling units in two phases. A total of 255 on-site parking spaces are required. The Project would provide 255 parking spaces once both phases are constructed, which would meet the applicable requirement.

9. **The project consists of an arrangement of buildings and structures (including height, bulk and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements that is or will be compatible with existing and future development on adjacent properties and neighboring properties.**

The revised plans dated July 16, 2019, show that the arrangement of buildings and structures will be compatible with existing and future development on adjacent and neighboring properties. The project does not exceed the height limitations of the RD1.5-1-O Zone, which restricts height to 45 feet, and is within the maximum allowable floor area. The project totals 2.853 acres, and spans 354 feet 8-inches, along Adams Boulevard to

the north; frontage of 176 feet, five-inches along Severance Street; 118 feet along the south abutting one-story structures, and 501 feet along the east along a parking lot, and a two-story structure. Along the west perimeter, 324 feet of the site abuts five single-family structures.

The project proposes four levels in total throughout the site. The four levels are comprised of three levels of residential uses above one level of above grade parking. The project also proposes 30,535 square feet of open space. Of this total, 700 square feet will be in the form of private open space. Common open space will be comprised of 29,835 square feet. Most of the open space is located at the roof deck, and just above the podium level as amenities for residents.

The following is a summary of the project and building arrangements and structures proposed:

Height. The project site's "1" Height District restricts height to 45 feet. The project proposes a 45-foot height. The floor area ratio is limited to 3:1. The subject buildings reach a maximum floor area of 1.75:1 for a total floor area of 185,985 square feet. No deviation or relief has been requested. The project is in compliance with the Code.

Bulk/Massing. The subject building includes a total of seven buildings above one common podium that is above grade and used for parking. Buildings are comprised of articulation and windows, and distinct architectural features that allow the building to differentiate one floor from the other. Balconies are proposed throughout residential units on all levels of residential floors. The project provides breaks.

Entrances. Ground level pedestrian entrances from Adams Boulevard are identified as part of Buildings 1 and 7. They are also identified from Severance Street as part of Building 1 and part of the podium leading into one of the long term bike parking areas just in front of Building 2. On the east elevation, a ground level entrance is located adjacent to the stairs that leads to an elevator lobby.

Yard Setbacks. The applicant has requested a 20 percent decrease in the required rear yard to allow 12 feet in lieu of the minimum 15 feet required in the RD1.5-1-O Zone. Thus, 12 feet of setback is proposed along the easterly portion of the site.

Seven-foot side yards are proposed throughout the identified side yards which include the north and south side yards as well as the yards that immediately abut the two-story multi-family homes along Severance Street and along Adams Boulevard. Technically, the portion off of Adams Boulevard will include an 8-foot 9-inch dedication, which would and a 7-foot side yard setback. A 15-foot front yard is proposed along the portion of the property that fronts Severance Avenue.

Off-Street Parking, Bicycle Parking, and Driveways. The project proposes 102 units for a total of 506 bedrooms. The project will provide 255 parking spaces. The project is requesting Parking Option 1 pursuant to LAMC 12.22 A.25(d)(1) for a qualifying Density Bonus project setting aside six (6) percent of the base density for Very Low Income Households. Parking Option 1 allows the provision of off-street parking spaces at the rate of 2.5 spaces per unit. The project consists of 102 units which results in a parking requirement of 255 parking spaces. The existing building that will be demolished provided 53 parking spaces.

The applicant will be required to provide the Code required number of bicycle parking spaces. Short term and long term bicycle parking spaces are proposed abutting the

driveway proposed off of the Severance Street. More long term bike spaces are proposed further south of the short term bike parking spaces and off of the east corner near University Avenue and 27th Street. With the revision of the project, the applicant added 101 long term bike parking spaces along the south portion of the property for a total of 220 short term and long term bicycle parking spaces. A 100-foot square-foot bike work maintenance area is dedicated on the northwest portion of the building. Driveways are proposed off of two areas in the plan. The first driveway is off of Adams Boulevard, where the project will utilize an existing driveway and will remain a Right-In, Right-Out Driveway. The second driveway will be off of Severance Street where there will be one lane for vehicles to enter and another lane to exit.

Loading. The building does not propose any commercial uses. No loading areas are identified in Exhibit A.

Lighting. All lighting should will be directed away from adjacent uses. Lighting will be shielded and down-casted within the site in a manner that prevents the illumination of adjacent public rights-of-way, adjacent properties, and the night sky.

Landscaping. Abundant landscaping is proposed along the perimeter of the site as well as within the development. Such landscaping includes accent trees, perimeter trees, street trees on Adams Boulevard, raised planter shrubs, other shrubs, grasses, groundcovers, and succulents, as well as other east-west paseo trees and north-south courtyard trees and pool deck and water feature trees. The applicant is subject to the regulations of the City's landscape ordinance.

Trash Collection. Trash collection and recycle bins are proposed in two locations. They are within the first level of parking and hidden from the public rights-of-way.

The project site is unique in size and the applicant has proposed a project that includes seven buildings within the allowable height of its zone and permitted floor area ratio.

The project provides abundant landscaping to allow for an assimilation into the area. However, the podium level elevates the residential uses above ground level and the project relies on stairs along the majority of the site to serve as ingress and egress onto the development.

Compatibility Analysis

The physical challenges of the surrounding multi-family structures west of the site immediately abutting the subject property, the one-story childcare center, as well as the east portion of the site, which abuts a two-story building, Institute for Multimedia Literacy, and associated parking lot used by the University of Southern California, creates challenges for the project to be compatible. With revisions to the project, the City Planning Commission determined the project would now be compatible with surrounding uses. The project removes the appearance of the above grade parking podium and the metal screens along the majority of the east elevation, as shown in the plans marked "Exhibit A" of the 2019 Zoning Administrator determination dated May 17, 2019. The revision and the removal of the metal screens and integrating the ground floor with the residential uses above allow for the subject building to transition well to the public rights-of-way through landscaping. The appearance of a walled off ground level as stated in the Zoning Administrator determination, have been removed in the revised plans, and exhibits improved interaction with the public right-of-way and enhanced landscaping.

Compatibility with Surrounding Uses

The site is immediately surrounded by multi-family uses along the west and south, and a two-story commercial building, Institute for Multimedia Literacy for to the east. The project's residential levels are on the second, third and fourth floors with the roof decks proposed for each building will be atypical of any development in the immediate area and in the residential zone. There are many multi-family developments that range from two- to four-stories tall.

Those immediately abutting the site to the west are multi-family dwellings that have utilized structures that appear like single-family homes. In the immediate area, across Severance Street near Adams Boulevard, the Hillview Apartments (2605 Severance Street), is a four-story apartment building, which includes an above-grade parking level, similar to the project. However, there are no rooftop amenities similar to the subject project. The southern façade of the Hillview Apartments extends just under 200 feet in into Severance Street.

The USC Annenberg House Apartments (711 W. 27th Street), east of the project site, includes three levels of residential units above one above-grade parking level. The USC Annenberg House Apartments stretches from Adams Boulevard to West 27th Street with setbacks observed. This length would be comparable to the length of eastern façade of Building 7, which is approximately 323 feet in length.

The subject project would extend even further for a total length of 501.5 feet with the southernmost portion of the building, Buildings 4 and 5 extending approximately 493 from the north property line. The site is unique, and the project would be one of the largest in the immediate area. With a large rooftop amenity, which is not seen in surrounding buildings, the applicant revised the project to address the potential for noise identified by the Zoning Administrator. The project provides design features to ensure noise will not affect surrounding uses and the subject building will be compatible with existing surrounding uses.

With the revisions of the project, the City Planning Commission determined the project would be compatible with current uses in the immediate area. The project does not exceed the height limits of the zone, and the design features allow for the rooftop amenity to be to be compatible with multi-family structures immediately abutting the subject project on Severance Street. With the project's design revision and features blending in with the surrounding area, the project will not impact future development and uses as residential uses and affordable units will be provided on the subject site. The craftsman design and the removal of the metal screens allows the project to bring in a pedestrian friendly design that will not affect future development in the area.

10. **The residential project provides recreational and service amenities to improve habitability for its residents and minimize impacts on neighboring properties.**

The project includes outdoor residential amenity spaces at the podium and building roof levels. The podium-level amenity space would include landscaping, gathering areas, paseos, outdoor cooking areas, and an outdoor swimming pool. Building roofs contain additional private amenity spaces that would include landscaping and outdoor lounge and cooking areas.

The project will provide usable open space intended for passive or active recreational use pursuant to L.A.M.C. Section 12.21-G. The applicant has also submitted a list plant species that will be used along the perimeter of the site as well as within the the development. Such include accent trees, perimeter trees, street trees on Adams

Boulevard, raised planter shrubs, other shrubs, grasses, groundcovers, and succulents, as well as other east-west paseo trees and north-south courtyard trees and pool deck and water feature trees.

ADDITIONAL MANDATORY FINDINGS

11. The National Flood Insurance Program rate maps, which are a part of the Flood Hazard Management Specific Plan adopted by the City Council by Ordinance No. 172,081, have been reviewed and it has been determined that this project is located in Zone B, areas between limits of the 100-year flood and 500-year flood; or certain areas subject to 100-year flooding with average depths less than 1 foot or where the contributing drainage area is less than 1 square mile; or areas protected by levees from the base flood.