



DEPARTMENT OF CITY PLANNING

SUPPLEMENTAL RECOMMENDATION REPORT

City Planning Commission

Date: February 23, 2023
(Continuation from December 12, 2022)

Time: after 8:30 a.m.

Place: In conformance with the Governor's Executive Order N-29-20 (March 17, 2020) and due to concerns over COVID-19, the CPC meeting will be conducted entirely telephonically by Zoom [<https://zoom.us/>].

The meeting's telephone number and access code access number will be provided no later than 72 hours before the meeting on the meeting agenda published at <https://planning.lacity.org/about/commissions-boards-hearings> and/or by contacting cpc@lacity.org

Public Hearing: August 23, 2021 & February 23, 2023

Appeal Status: Off-Menu Density Bonus Housing Incentives and Waivers are not appealable.

Expiration Date: February 23, 2023

Multiple Approval: Yes

PROJECT LOCATION: **1848 South Gramercy Place**
(legally described as Lot 76, Angelus Vista tract)

PROPOSED PROJECT: The project is the construction, use, and maintenance of an **8-story, 89** 73-foot, ~~4 inches~~ foot tall mixed-use building comprised of 33 residential dwelling units (3 units are restricted to Very Low Income households), and approximately **466** ~~356~~ square feet of commercial space. The project will provide two levels of parking at-grade and at the second floor, comprising a total of **20** ~~22~~ parking spaces. The project also provides 32 long-term and 5 short-term bicycle parking spaces. The project will be ~~31,263~~ **37,025** square feet in floor area with a Floor Area Ratio ("FAR") of **6.04:1** ~~5:1~~. The site is currently developed with a vacant, two-story residential structure that is to be demolished as part of the project. There is one large street tree along the western side of the subject site on the public right-of-way.

Case No.: CPC-2020-2115-DB-HCA

CEQA No.: ENV-2020-2116-CE

Incidental Cases: Not Applicable

Related Cases: PAR-2020-3292-VHCA
CHC-2018-3217-HCM

Council No.: 10 – Mark Ridley Thomas

Plan Area: South Los Angeles

Plan Overlay: South Los Angeles
Community Plan
Implementation Overlay
("CPIO") Subarea
Neighborhood-Serving
Corridor

Certified NC: West Adams

GPLU: Neighborhood Commercial

Zone: C1.5-1VL-CPIO

Applicant: Janet Jha,

Representative: Akhilesh Jha

**REQUESTED
ACTION:**

1. Pursuant to LAMC Section 12.22.A.25, a Density Bonus Compliance Review to permit the following development incentives:
 - a. An off-menu incentive to permit a Floor Area Ratio of 6.1:1 in lieu of 1.5:1 permitted in the LAMC;
 - b. An off-menu incentive to waive the requirements of the Low Impact Development (LID) (Ordinance 181899 and 183833) and the National Pollutant Discharge Elimination System (NPDES) Permit.

2. Pursuant to LAMC Section 12.22 A.25(g)(3), a review of the following Waivers of Development Standards:
 - a. A Waiver of Development Standard to permit a 8-story building with a height of 89 73 feet 4 inches feet (to the rooftop parapet) in lieu of 45 feet otherwise permitted in the C2 zone;
 - b. Waiver of Development Standard to waive the transitional height requirement per the South LA CPIO Section II A.2(d);
 - c. Waiver of Development Standard to allow side yard setbacks of 0 feet from the 1st to 2nd floors, and 5 feet from the 3rd to 7th 8th floors in lieu of 10 feet;
 - d. Waiver of Development Standard to allow a rear yard setback of 5 feet from the 1st to 2nd floors, and 10 feet from the 3rd to 8th floors in lieu of 19 feet;
 - e. Waiver of Development Standard to allow a reduction in open spaces to 2,418 ~~1,500~~ square feet in lieu of 3675 ~~3,700~~ square feet; per LAMC 12.21-G.
 - f. Waiver of Development Standard to allow a passageway width of 3 feet in lieu of 20 feet.
 - g. Waiver of Development Standard to allow a commercial frontage of 10 feet in lieu of 17.5 feet.
 - h. Waiver of Development Standard to allow a landscape buffer of 0 feet in lieu of the 5 feet requirement per the South LA CPIO Section II C.4.
 - i. Waiver of Development Standard to allow a ground floor height of 10 feet ~~5~~ inches in lieu of 14 feet per the South LA CPIO Section II A.1(b).

2. Pursuant to California Environmental Quality("CEQA") Guidelines Section 15332, that the project was assessed in ENV-2020-2116-CE, and the project is categorically exempt from the California Public Resources Code, and Article 19, (Class 32 - Infill Development) of the CEQA Guidelines.

RECOMMENDED ACTIONS:

1. **Find**, that based on the independent judgement of the decision-maker, after consideration of the whole of the administrative record, the project was assessed in ENV-2020-2116-CE, and the project is categorically exempt from the California Public Resources Code, and Article 19, (Class 32 - Infill Development) of the CEQA Guidelines.
2. **Approve**, pursuant to Los Angeles Municipal Code ("LAMC") Section 12.22 A.25(g)(3), a Density Bonus Compliance Review, for a project totaling 33 dwelling units, including 3 dwelling units for Very Low Income Household occupancy for a period of 55 years, with the following two (2) Off-Menu Incentives:

- a. An incentive to permit a Floor Area Ratio of 6.1:1 ~~5:4~~ in lieu of 1.5:1 permitted in the LAMC;
- b. **An off-menu incentive to waive the requirements of the Low Impact Development (LID) Ordinance (Ordinance 181899 and 183833) and,**

In addition to the two (2) Off-Menu Incentives, the applicant requests the following Waivers of Development Standards:

- c. A Waiver of Development Standard to allow a ~~8-~~ 7 story building with a height of 89 feet ~~78 feet 4 inches~~ (to the rooftop parapet) in lieu of 45 feet otherwise permitted in the C1.5 zone.
 - d. Waiver of Development Standard to waive the transitional height requirement per the South LA CPIO Section II A.2(d);
 - e. Waiver of Development Standard to allow side yard setbacks of 0 feet from the 1st to 2nd floors, and 5 feet from the 3rd to 8th ~~7th~~ floors in lieu of 10 feet;
 - f. Waiver of Development Standard to allow a rear yard setback of 5 feet from the 1st to 2nd floors, and 10 feet from the 3rd to 8th ~~7th~~ floors in lieu of 19 feet;
 - g. Waiver of Development Standard to allow a reduction in open spaces to 2,418 ~~4500~~ square feet in lieu of 3,675 ~~3700~~ square feet; per LAMC 12.21-G.
 - h. Waiver of Development Standard to allow a passageway width of 3 ~~42.5~~ feet in lieu of 22 feet.
 - i. Waiver of Development to allow a commercial frontage of 10 feet in lieu of 17.5 feet.
 - j. Waiver of Development Standard to allow a landscape buffer of 0 feet in lieu of the 5 feet requirement per the South LA CPIO Section II C.4.
 - k. Waiver of Development Standard to allow a ground floor height of 10 feet ~~5 inches~~ in lieu of 14 feet per the South LA CPIO Section II A.1(b).
3. **Dismiss without Prejudice** the Incentive to waive the requirements of the National Pollutant Discharge Elimination System (NPDES) Permit.

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Director of Planning



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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 *Commission Secretariat, Room 273, City Hall, 200 North Spring Street, 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 agendized 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 these 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.

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Exhibits:

- Exhibit A – Modified Project Plans
- Exhibit B – Maps – Radius, ZIMAS, Aerial
- Exhibit C – Site Photos
- Exhibit D – Updated Affordable Housing Referral Form, Updated Preliminary Zoning Assessment form and HCIDLA Replacement Letter
- Exhibit E – Environmental Studies
- Exhibit F – Agency letters
- Exhibit G – Public Correspondence
- Exhibit H – Updated Applicant’s Declaration Supporting Incentive and Waiver Requests; LADOT Referral Form
LAHD’s SB8 Memo
Applicant Provided Parking Diagram
Project Plans from October, 2022.

SUPPLEMENTAL REPORT

City Planning Commission Meeting of December 8, 2022

The City Planning Commission, at the request of the Applicant, continued the item to February 23, 2023. The Applicant wished to modify the project scope. The Applicant waived the December 8th scheduled CPC hearing as counting towards the 5 hearing limit per the Housing Crisis Act and on November 28th, 2022, granted an extension of time to Act on the project to February 23, 2023.

Subsequent to the December 8th CPC meeting, the applicant submitted an updated Planning Application. As a result of the modified project, the following exhibits are updated or added: Exhibit A – Modified Project Plans, Exhibit D – Updated Affordable Housing Referral form, Updated Planning Zoning Assessment Form and Exhibit H – Updated Declaration of Incentives and Waivers to modify the project as follows: an increase to an 8 story, 89 foot project from the previous 7 stories in height and 75 feet, an FAR of 6:1 in lieu of 5:1 (37,393 square feet in lieu of 31,263 square feet), a reduction in the required open space to be provided from 1,500 square feet previously to 2,418 in the modified project in lieu 3,625 square feet rather than 3,700. The increased scale of the project does not change the amount of units proposed or the affordability level of the project. Beyond the aforementioned changes, the project now provides a 571 square foot children's playroom on the third floor, a 571 square foot co-working space on the fourth floor, a 571 square foot conference room on the fifth floor, a 571 square foot business center on the 6th floor and a 571 square foot clubhouse on the 7th floor. The Applicant also added an incentive request to waive the requirements of the Low Impact Development (LID) (Ordinance 181899 and 183833) as well as the National Pollutant Discharge Elimination System (NPDES) Permit (state requirement). The amount of residential and non-residential parking provided changes from 22 total parking spaces in the previous project to 20 spaces in the modified project.

City Planning Commission Meeting of October 27, 2022

The Applicant requested in writing that the item be continued to December 8, 2022. The Commission approved the request.

City Planning Commission Meeting of June 23rd, 2022

The City Planning Commission convened on June 23rd, 2022 to deliberate on the proposed project a second time. Overall the Commissioners were disappointed in the lack of changes to the project since the last meeting of March 2022 and requested that staff address concerns raised in public comments letters submitted to the City Planning Commission. The Commission continued the project to October 27, 2022 in order to have a supplemental report to consider the following: Are the requested incentives and waivers sound and appropriate as it relates to the State Density Bonus Law? Is there potential for specific adverse impacts as it relates to State Density Bonus law, in particular was there a traffic study required and reviewed by LADOT and was there an air quality study as it relates to the ventilation of the parking on the north facade? Is there a limit on the amount of Waivers that can be asked for per State Density Bonus Law? As it related to SB8 requirements, the Commissioners had the following concerns: does the bedroom count get replaced or just the unit count? What is the relocation plan for existing tenants and do they have a first right to return to the new unit?

Parking & Design

On September 12, 2022 Planning met with the Applicant to discuss design options so that the project better integrates with the neighborhood. The discussion included recommendations on materials and architectural style. Planning also noted options for concealing and better integrating architecturally the parking podium openings facing the adjacent residential unit to the north and provided examples. Planning also noted that the commercial component of the project is rather

small at 466 square feet and that the space could be better utilized to expand the residential lobby. The Applicant was also instructed to consider that the electric vault's placement underneath the entrance to the residential lobby would be subject to the Department of Water and Power review for approval (LADWP).

The Applicant presented a Parking Diagram (which is part of the Exhibit H) and explained that the design team studied two design configurations for accessing two parking floors: (a) two separate driveways and (b) one driveway and one internal ramp. It was found that a two separate driveway design provides independent access to all ~~18~~ 19 parking spaces for residential units (no tandem parking needed). On the other hand, giving one driveway and one internal ramp allowed independent access to only 10 parking spaces (with the rest having to be tandem). The Applicant expressed that the independent parking access to a greater number of residential units was preferable and chosen. Planning asked if the internal ramp design would allow for two below grade parking levels, which the Applicant responded to in the affirmative. Planning also expressed a preference for below-grade parking even if tandem parking would result and advised that the 8 tandem parking spaces could be utilized by units with two or more bedrooms, which in this case would be ten (10) two-bedroom units and two (2) three-bedroom units.

On September 30, 2022, the Applicant submitted a revised set of plans. The revised plans reflect four formal changes. The first is that handrails have been added along the corridor openings facing south towards Washington Boulevard. Second, the wooden siding has been greatly reduced on the project's northern façade, and eliminated entirely on its southern façade, in order to break up the building mass with a more subtle alternating colors of stucco. The third change was to reduce the depth of the extrusion/cornice on the front façade. The final and most significant change has been to redesign the ventilation openings at the first and second floors of the building's northern façade. Instead of long horizontal bars, these openings have been reduced to align with and match the size of picture windows on the upper floors.

Class 32 Categorical Exemption

Questions regarding the Class 32 Categorical Exemption are addressed as follows. A traffic study was not required for the project per the LADOT Referral Form signed by Wes Pringle of LADOT on March 14, 2022 indicating that a VMT analysis is not required as the project does not generate 250 or more vehicle trips (Exhibit H) as it generates 175 trips. In regards to an Air Quality Study, a project with 33 dwelling units and without special circumstances is not expected to result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainable under an applicable federal or state ambient air quality standard. The proposed project at 33 dwellings units falls below the screening threshold of 80 dwelling units, or 75,000 square feet of non-residential use, with less than 20,000 cubic yards of soil export. These screening criteria were developed by City Planning in consultation with South Coast AQMD staff by surveying published air quality studies for which criteria air pollutants did not exceed the established SCAQMD construction and operational thresholds. The surveyed air quality studies used California Emissions Estimator Model (CalEEMod) runs relying on reasonable assumptions.

State Density Bonus Law

Regarding the Incentives per the State Density Bonus law, they were vetted by Planning Staff to ensure the incentive is 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 and that the incentives will not have a specific adverse impact upon public health and safety as defined in paragraph 2 of subdivision d of Section 65589.5. These findings are provided in the staff report herein.

Regarding the Waivers of Development Standards per the State Density Bonus law, an applicant may submit to the city a proposal for the waiver or reduction of development standards that will have the effect of physically precluding the construction of a development at the density or incentives permitted under state density bonus law. The State Density Bonus law does not provide a limit as to the amount of waivers an applicant may request. The findings established in the staff report herein find that without the waivers the project will be physically precluded from the construction of the development project at the density and with the incentives proposed and permitted under state law.

SB8 Requirements

Regarding the SB8 compliance, as stated in the LAHD's SB8 Replacement Unit Determination letter dated March 2, 2022 (Exhibit H), occupants of Protected Units are entitled to: Relocation benefits and the right of first refusal ("Right to Return") to a comparable unit (same bedroom type) at the completed Project. On February 17, 2022, an occupant letter package was sent to the single family dwelling unit on the property, however no income verification documents were provided. When no income-verification is sent by the occupants, they fail to establish that they are occupants of a protected unit and forfeit their "Right to Return" to a comparable unit, which in this case will be a 3 bedroom unit for a household of Very Low Income and are ineligible for Relocation Benefits. Pursuant to (SB 8), where incomes of existing or former tenants are unknown, the required percentage of affordability is determined by the percentage of extremely low, very low, and low income rents in the jurisdiction as shown in the HUD Comprehensive Housing Affordability Strategy (CHAS) database. In this case a Very Low Income unit is required as part of the SB8 Determination to be 3 bedrooms since the single family dwelling bedroom replacement is capped at three bedrooms.

City Planning Commission Meeting of March 24th, 2022

The City Planning Commission convened on March 24th, 2022 to deliberate on the proposed project. Several Commissioners had the following concerns with the project: the meager amount of open/community space provided, the size and disposition of the parking structure, the status

of existing residents on site, and the excessing height and massing of the structure. At present, no changes to the project are being proposed. These concerns were also raised at an additional meeting between planning staff and the applicant on April 22nd, 2022, the summary of which may be found below.

Additional Meeting, Post-CPC Hearing:

The project was discussed at another meeting with planning staff, including the applicant's team, on Friday, April 22nd, 2022, following the March 24th CPC hearing date. The CPC's concerns were discussed as follows:

- **Community Outreach and Current Residents**
The applicant agreed to restart outreach efforts in response to the Commissioners' concerns, verifying that there are currently tenants residing on the site. They acknowledged that the SB8 legislation, which amends Sections 65589.5, 65905.5, 65913.10, 65940, 65941.1, 65943, 65950, 66300, and 66301 of the Government Code, supersedes AB 2556 (Section 65915 of the Government Code). This amends the original determination letter, dated June 13, 2018, which did not apply to single family residences. That original AB 2556 determination had found that no affordable units would be required in this case. The SB8 letter, however, dated March 2, 2022, indicates that one four-bedroom unit is to be replaced at a Very Low Income level. It also specifies that occupants of Protected Units are also entitled to relocation benefits and the right of first refusal, otherwise known as Right to Return, to a comparable unit of the same bedroom type at the completed Project.
- **Community Space**
The applicants have included the largest amount of community and open space possible (in the form of a shared gym and private balconies) while still providing the Applicant's desired amount of parking (see discussion below).
- **Parking disposition**
Keeping the parking above grade eliminates the need for an additional ramp, allowing the applicants to provide more parking which they consider to be a community benefit. They added that including subterranean parking would use up more square footage due to clearance spaces needed to accommodate the required ramps. Given the narrow width of the lot, this would require three levels, as opposed to the currently proposed two, to accommodate the amount of parking proposed. The Applicants stated that this would be cost-prohibitive, and they also do not want to reduce the parking further as they view the amount of parking to be well below what future tenants will ultimately need. The project presently proposes 20 parking spaces, as opposed to the 18 otherwise allowed (.5 spaces per dwelling unit rounded up to the nearest whole number, plus another for the commercial space). Therefore, the Applicant is not taking the full parking reduction for this project.
- **Parking Vents**
In response to Commission feedback, the applicant stated that the required vents must be sited facing north towards an existing two-story apartment building. The project proposes a five-foot setback along its northern edge to account for an egress pathway that leads from the rear yard egress stairwell to Gramercy Place. Locating these vents to the south would be infeasible, as the project is currently proposing a 0-foot setback along its southern edge. Any vents there could be blocked by future development as the abutting commercial zone, fronting Washington Boulevard, likewise allows for a 0-foot setback.
- **Height and Massing**

Per Commissioner feedback regarding the excessive size and scale, the applicant acknowledges that reducing the number of units would likewise reduce the amount of parking and massing needed to construct the proposed project. They view this option as contrary to their financial interests, claiming that it is only a matter of time until much of Washington Boulevard in this area has taller buildings.

PROJECT ANALYSIS

PROJECT SUMMARY

The project is the construction, use, and maintenance of a ~~8~~ 7-story, ~~89~~ 73-foot, 4-inches tall mixed-use building comprised of 33 residential dwelling units (3 units are restricted to Very Low Income households), and approximately 466 square feet of commercial space. The project will provide two levels of parking at-grade and on the second floor, comprising a total of 20 parking spaces. These first two levels will be built using Type I-A construction while the upper ~~sixth~~ five floors will be built using Type III-A construction. A fire resistance barrier of three hours separates the two construction types. The project also provides 32 long-term and 5 short-term bicycle parking spaces. The project will be ~~37,025~~ 34,263 square feet in floor area with a Floor Area Ratio ("FAR") of ~~6~~ 5.4:1.

The residential units are located on the third through ~~eighth~~ seventh floors, consisting of ~~twenty-one~~ (20)(24) one-bedroom units ranging from 571 to 675 square feet, ~~twelve~~ ten (~~12~~10) two-bedroom units at 930 square feet, and ~~one~~ two (~~1~~2) three-bedroom units at 1,220 square feet. Residential amenities will be provided through a 600 square foot gym at the second floor, along with 30 balconies at 50 square feet each. **The project also includes a 571 square foot children's playroom on the third floor, a 571 square foot co-working space on the fourth floor, a 571 square foot conference room on the fifth floor, a 571 square foot business center on the 6th floor, a 571 square foot clubhouse on the 7th floor and a 675 square foot recreation room on the 8th floor.** Totalling 1,500 square feet of required open space, these balconies are at the third through ~~eighth~~ seventh floors fronting the north and south elevations. A twelve inch wide strip of landscaping abuts the site's northern edge.

The site is currently developed with a vacant, two-story residential structure that is to be demolished as part of the project. There are no protected trees and a non-protected significant trees on the subject site; however, one (1) non-protected significant street tree may be removed from the public right-of-way. The Project assumes a worst-case scenario of removing the street tree, in the event of changes to the right-of-way improvement plans after approval of the environmental clearance. However, this analysis does not authorize the removal of any street trees without prior approval of Urban Forestry, in compliance with Los Angeles Municipal Code, Chapter VI, Section 62.169 through 62.170 and their applicable findings.

BACKGROUND

Subject Property

The subject site is an interior lot located north of the intersection of West Washington Boulevard and South Gramercy Place, just west of Western Avenue in the South Los Angeles Community Plan Area. The project site consists of one (1) contiguous lot, with an area of 8,931 square feet.

The site has approximately 50 feet of frontage along the east side of Gramercy Place, with no additional street frontages. The site is currently developed with a vacant, two-story residential structure.

Zoning and Land Use Designation

The project site is located in the South Los Angeles Community Plan Area, and is designated for Neighborhood Commercial land uses, with corresponding zones of C1, C1.5, CR, C2, C4, R3, and RAS3. The site is zoned C1.5-1VL-CPIO and is consistent with the land use designation. The site is located within a Transit Priority Area. The site is also located within the South Los Angeles Community Plan Implementation Overlay (“CPIO”) Neighborhood-Serving Corridor Subarea. The CPIO contains additional regulations for ground floor and building height (including transitional height), density, floor area, building disposition, building design, and parking.

Surrounding Uses

The surrounding area is developed with a combination of single-family and multi-family residential, and various storefront commercial uses. Several adjacent properties are also within the South Los Angeles CPIO, Character Residential Subarea. The remaining parcels on the block lie mainly north and eastwards, fronting Washington Boulevard to the south, St Andrews Place to the east, and 18th Street further north. The parcels immediately north and east are zoned C1.5-1VL-CPIO in the Neighborhood-Serving Corridor Subarea and are improved with one to two-story commercial structures. The properties north are zoned RD2-1-CPIO, R3-1-CPIO, and are improved with one- and three-story residences. Properties across Gramercy Place to the west are zoned C1.5-1VL-CPIO and RD2-1-CPIO, improved with multifamily apartment buildings and a four-story TOC project that recently completed construction (DIR-2017-5395-SPR-TOC).

Streets and Circulation:

South Gramercy Place, abutting the property to the west, is a designated Collector Street, with a designated right-of-way width of 66 feet and a roadway width of 40 feet. It is currently dedicated to a 80 foot right-of-way and improved with a curb, gutter, and sidewalk.

Public Transit

The project site is located just north of the intersection of Washington Boulevard and South Gramercy Place, which serves the Los Angeles County Metropolitan Transit Authority (“Metro”) bus lines 35, and LADOT Midtown Line. The site is also within a Transit Priority Area.

Relevant Cases and Building Permits

Subject Site:

CHC-2018-3217-HCM – A Historic-Cultural for the residence located at this site was filed on May 1, 2018. At the Cultural Heritage Commission meeting, held on July 5, 2018, the Commission determined that this property does not conform with the definition of a Monument pursuant to LAMC Section 22.171.7 by a vote of 5-0.

Surrounding Sites:

DIR-2017-5395-SPR-TOC – Located west and directly across the street from the subject site, the Gramercy Place Apartments consist of a 51,296 square-foot transit-oriented mixed use building with subterranean parking. This building is four stories tall, with a

maximum height of 45 feet, and is comprised of apartments, commercial, and communal open space areas.

REQUESTED ACTIONS

Density Bonus / Affordable Housing Incentives Program

Per Government Code Section 69515(c)(1), the Project qualifies for a density bonus increase of 35 percent or 10 additional market rate units, with an existing protected unit on the site subject to replacement per SB 8 (Exhibit D). This density bonus is proposed in exchange for setting aside 13% of the base density (3 units) for Very Low Income households for a period of 55 years. As a result of setting aside 13% of the 23 by-right density units, the applicant qualifies for two (2) incentives as follows.

- a. A Floor Area Ratio of **6:1** ~~5:4~~ in lieu of 1.5:1 as otherwise permitted in the C2-1VL-CPIO zone.
- b. **Incentive to waive the requirements of the Low Impact Development (LID) (Ordinance 181899 and 183833) related to the state National Pollutant Discharge Elimination System (NPDES) Permit.**

In addition to the two (2) Off-Menu Incentives, the applicant requests the following Waivers of Development Standards:

- a. A **30 foot** increase in the maximum building height to allow **89 feet** ~~78 feet 4 inches~~ in lieu of 45 feet otherwise permitted in the C1.5-1VL-CPIO zone.
- b. To waive the transitional height requirement per the South LA CPIO Section II A.2(d).
- c. A reduction in the side yard setbacks of 0 feet from the 1st to 2nd floors, and 5 feet from the 3rd to **8th** ~~7th~~ floors in lieu of 10 feet otherwise permitted in the C1.5-1VL-CPIO zone.
- d. A reduction in the rear yard setback of 5 feet from the 1st to 2nd floors, and 10 feet from the 3rd to **8th** ~~7th~~ floors in lieu of 19 feet otherwise permitted in the C1.5-1VL-CPIO zone.
- e. A reduction in the required open space to **2,418** ~~4,500~~ square feet in lieu of **3,675** ~~3,700~~, pursuant to LAMC Section 12.21.G.
- f. A reduction in the passageway width to allow **3 feet** in lieu of 22 feet otherwise required pursuant to LAMC Section 12.21 C.2(b).
- g. A reduction in commercial frontage of 10 feet in lieu of 17.5 feet otherwise required by LAMC Section 12.22 A.23.
- h. To allow a landscape buffer of 0 feet in lieu of the 5 feet requirement per the South LA CPIO Section II C.4.
- i. A reduction in ground floor height to allow 10 feet in lieu of 14 feet per the South LA CPIO Section II A.1(b).

ISSUES

The following section includes a discussion of issues and considerations related to the project.

Urban Design Studio:

The Urban Design Studio reviewed the project on Thursday, August 6, 2020 and received the project unfavorably with the following comments:

- The project is significantly out of scale with its surroundings.
- The height creates issues for neighbors in the Character Residential Subarea to the north, blocking sunlight especially and presenting a monolithic street wall two stories high.
- Articulation at the two-story podium is fairly limited due to parking requirements.
- The commercial space and mezzanine is fairly small in terms of square footage, limiting its utility for any future tenants.
- Very little community benefit is being provided in exchange for number of waivers of development being requested.

Professional Volunteer Program (PVP):

The project was presented to the Professional Volunteer Program on Tuesday, June 15, 2021 and received unfavorably. Below is a summary of the comments organized in along areas outlined in the city's Urban Design Guidelines:

- **Pedestrian First Design**
 - The project presents operational issues. For example the trash and recycling enclosure are too small and not accessible from the retail space and the retail space is constrained with a difficult to lease layout.
 - Reduce the width of the driveway to the minimum allowed by LADOT.
 - Consider ways to embed the stairs to the residential lobby to promote physical activity.
 - Protect and maintain the existing mature street tree. Reach out to LAUFD to discuss potential options. If the tree needs to be removed you need to replace it in a 2-1 rate.
- **360 Degree Design**
 - Provide detailed materials on the elevations.
 - The project should respond to the local area context, the public realm and the relationships with adjacent buildings and should be shaped to consider the quality and functionality of the urban fabric.
 - Can the parking be placed underground? If not consider ways to design the podium so it is adaptable to a different use in the future and make sure it is appropriately screened per the Above Ground Parking Advisory. A visible long wall, non-screened openings or metallic louvers overlooking residential windows should be avoided. Consider landscaping and high quality architectural elements that are opaque and add visual interest. Make sure that headlights, structure lights and exhaust gas do not impact the residential adjacent properties.
 - Ensure that access and the building entrance is prominent and clearly legible and the lobby is comfortable to use with space for mail boxes.
 - Use architectural elements to reduce the perceived mass of the project.
 - Make sure that the project complies with the South Los Angeles CPIO District ([Neighborhood-Serving Corridor](#) Sub Area) Development Standards, including building design, articulation and glazing. For example, a 5-foot landscape buffer, shall be provided between the project and the abutting lot zoned RD2 to the north.

- The landscaping should be drought tolerant, evergreen, and capable of growing to a height of 10 feet. If you need additional recommendations, the Urban Design Studio has developed a Native Screening Hedges resource.
- The East and South Elevations need additional work.
 - Windows should incorporate well-designed trims and details. Consider adding awnings above the windows at the west elevation to features to reduce heat gain and glare and add visual interest.
 - Consider a redesign of the awning above the building's entrance.
 - What is the small unidentified space at the back of the project?
 - Consider clearstory windows for bathrooms that overlook the exterior corridor with access to natural light.
 - Provide an open space diagram and ensure the balcony dimensions comply with the private open space minimum requirements. Can the rooftop used for common open space?
 - Provide more information on the landscaping of the sideyards and consider ways to better buffer from the adjoining properties.
- **Climate Adapted Design**
 - G Provide a rooftop plan with any mechanical units and indicate solar on the roof.
 - Vines should be placed at the ground and exterior of the building's walls.
 - Indicate required and provided on-site trees. On site trees need to be 24"-box size or above to count as provided trees and palms are excluded. Trees should be native and provide shade upon maturity.
 - Consider native plants that provide year-long habitat.
 - Indicate LID compliance.

In response to both the UDS and PVP feedback, the applicant team reiterated the need to maintain the current building design with respect to the Waivers of Development standard requested. The applicant claimed that these waivers are necessary to address several constraints related to the site's base zoning and the CPIO. The applicant will consider which design changes can be made.

Additional Meeting:

The project was discussed at a meeting with planning staff, including the applicant's team, on Friday, January 28, 2022. The PVP feedback was reiterated and discussed, with particular attention paid to the need for changes to the building's façade. The materials and colors specified for the exterior façade were discussed, with the consensus that more naturalistic materials be incorporated. This would not only serve to enhance the building's articulation, but also work to display greater compatibility with the CPIO Character Residential Subarea just north of the site. The applicant's team subsequently submitted updated plans on February 28, 2022.

These updated plans largely show changes in exterior cladding, switching out bright white and lipstick red stucco accents with more muted white and beige stucco. Naturalistic wood siding has been added to articulate vertical massing on the building's northern elevation and pedestrian entry level. Ribbon windows at the second-level façade have been broken up for better compatibility with the rest of the building's overall fenestration pattern.

Public Hearing:

The public hearing was held on August 23, 2021 at approximately 3:30 pm telephonically via Zoom in conformance with the Governor's Executive Order N-29-20 (March 17, 2020). The following issues raised included the amount of incentives requested, the FAR of the project, the

height of the project, the preservation of existing housing, and privacy for neighbors immediately north of the project.

CONCLUSION

Based on the information submitted to the record, staff recommends that the City Planning Commission approve the project, as recommended, subject to the Conditions of Approval. The project will include the construction of a 33-unit mixed-use building resulting in a net increase of 32 dwelling units, including 3 Very Low Income units.

CONDITIONS OF APPROVAL

1. **Site Development.** Except as modified herein, the project shall be in substantial conformance with the plans and materials submitted by the Applicant, dated **November 10, 2022**, and stamped "Exhibit A," and attached to the subject case file. No change to the plans will be made without prior review by the Department of City Planning, West/South/Coastal Project Planning Division, and written approval by the Director of Planning. Each change shall be identified and justified in writing. Minor deviations may be allowed in order to comply with the provisions of the Los Angeles Municipal Code or the project conditions.
2. **Residential Density.** The project shall be limited to a maximum density of 33 residential units including Density Bonus Units.
3. **Affordable Units.** A minimum of 3 units, that is 13% of the 22 base dwelling units, shall be reserved as affordable units for Very Low Income household occupancy, as defined by the State Density Bonus Law 65915 (c)(1) or (c)(2). The Density Bonus Affordable Housing Incentive Program Guidelines also requires a Housing Development to meet any applicable housing replacement requirements of California Government Code Section 65915(c)(3), as verified by the Los Angeles Housing Department (LAHD) prior to the issuance of any building permit. Replacement housing units required per this section may also count towards other On-Site Restricted Affordable Units requirements.
4. **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 LAMC Section 12.22 A.25 (a-d) and State Density Bonus Law (Government Code Section 65915).
5. **Housing Requirements.** Prior to issuance of a building permit, the owner shall execute a covenant to the satisfaction of the Los Angeles Housing Department (LAHD). The covenant shall bind the owner to reserve three (3) units available to Very Low Income Households, for sale or rental as determined to be affordable to such households by LAHD for a period of 55 years. In the event the applicant reduces the proposed density of the project, the number of required set aside affordable units may be adjusted, consistent with LAMC Section 12.22-A.25, to the satisfaction of LAHD, and in consideration of the project's SB 330 and SB* Determination. Enforcement of the terms of said covenant shall be the responsibility of LAHD. 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 any monitoring requirements established by the LAHD. Refer to the Density Bonus Legislation Background and Housing Replacement (SB 330 and SB8 Determination) Background sections of this determination (Exhibit D).
6. **Automobile Parking for Residential Uses.** The project shall provide a minimum of ~~24~~ **19** parking spaces, as shown in Exhibit A, per AB 2345.
7. **Automobile Parking for Commercial Uses.** The project shall provide a minimum of one (1) parking space, as shown in Exhibit A; **per AB 2345, as the Property is located within an Enterprise Zone, commercial parking is required at 2 parking spaces per 1,000 SF, consistent with LAMC Section 12.21 A.4(x)(3)6.**
8. **Height** The project shall be limited to **eight (8) stories** and **89** feet in height per Exhibit A.

9. **Floor Area Ratio** The project shall be limited to a maximum floor area ratio ("FAR") of **6:1**, per Exhibit A.
10. **Community Plan Implementation Overlay.** Prior to the issuance of a building permit, the applicant shall demonstrate compliance with the South Los Angeles Community Plan Implementation Overlay ("CPIO") pursuant to Ordinance No. 185,927 and demonstrate that the project meets the definition of a Mixed-Income Project.
11. **(Incentive) Project is exempt from the requirements of the Low Impact Development (LID) Ordinance (Ordinance 181899 and 183833).**
12. **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 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 above.
13. **Bicycle Parking.** Bicycle parking shall be provided consistent with LAMC 12.21 A.16 and Exhibit "A".
14. **Electric Vehicle Parking.** All electric vehicle charging spaces (EV Spaces) and electric vehicle charging stations (EVCS) shall comply with the regulations outlined in Sections 99.04.106 and 99.05.106 of Article 9, Chapter IX of the LAMC.
15. **Unbundled Parking.** Residential parking shall be unbundled from the cost of the rental units, with the exception of parking for Restricted Affordable Units.
16. **Landscaping.** The landscape plan shall indicate landscape points for the project equivalent to **10% more than otherwise required** by LAMC 12.40 and Landscape Ordinance Guidelines "O". 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.
17. **Facade Design.** The project shall comply with the following:
 - a. The project shall include varied exterior materials and articulation as presented in Exhibit "A" (Elevations, Material Board, and Renderings), including flat seam metal panels, wood face siding, added metal railings on the south façade balconies, reduced roof overhang in the front façade, modified garage ventilation design into smaller components, and smooth finish stucco in white, light grey, and "concrete" finish. The building color and materials (design theme) shall be included on each elevation.
 - b. The facade shall include the articulation shown as presented in Exhibit "A" (Floor Plan, Elevations, and Renderings) which includes private open space distributed as balconies among the units. The percentage and layout of façade square footage devoted to fenestration shall be built and detailed exactly as depicted in Exhibit "A"
18. **Open Space .** The project shall provide a minimum of ~~4,500~~ **3,525** square feet of usable open space per LAMC 12.21.G.2, see Exhibit "A". The project shall include 2,025 square feet of recreation rooms and 1,500 square feet of balconies.

19. **Rear Setback (Waiver).** The rear setback shall be no less than five feet on the ground through second floors, and ten feet from the third to ~~seventh~~ **eighth** floors, as shown in Exhibit A.
20. **Side Yard Setback (Waiver).** The side yard setbacks shall be no less than five feet on the ground through second floors for the northern edge of the lot, and zero feet on the ground through second floors southern edge of the lot. The side yard setbacks shall be no less than five feet from the third through ~~seventh~~ **eighth** floors.
21. **Soil Depths.** Shrubs, perennials, and groundcover shall require a minimum soil depth as follows:
 - a. A minimum depth with a height ranging from 15 to 40 feet shall be 42 inches.
 - b. A minimum depth with a height ranging from 1 to 15 feet shall be 24 to 36 inches.
 - c. A minimum depth with a height of less than 1 foot shall be 18 inches.
 - d. A minimum depth of an extensive green roof shall be 3 inches.

Trees shall require a 42-inch minimum soil depth.

Further, the minimum amount of soil volume for tree wells on the rooftop or any above grade open spaces shall be based on the size of the tree at maturity:

- e. 220 cubic feet for trees with a canopy diameter ranging from 15 to 19 feet.
 - f. 400 cubic feet for trees with a canopy diameter ranging from 20 to 24 feet.
 - g. 620 cubic feet for trees with a canopy diameter ranging from 25 to 29 feet.
 - h. 900 cubic feet for trees with a canopy diameter ranging from 30 to 34 feet.
-
22. **Street Trees.**
 - a. Street Trees. Street trees shall be provided to the satisfaction of the Urban Forestry Division.
 - b. New street trees shall be planted within the public right-of-way, where feasible, at a ratio of at least one (1) tree for every 25 feet of lot length, to the satisfaction of the Bureau of Street Services, Urban Forestry Division, Department of Public Works.
 - c. Project shall preserve all healthy mature street trees whenever possible. All feasible alternatives in project design should be considered and implemented to retain healthy mature street trees. A permit is required for the removal of any street tree and shall be replaced 2:1 as approved by the Board of Public Works and Urban Forestry Division.
 - d. Plant street trees at all feasible planting locations within dedicated streets as directed and required by the Bureau of Street Services, Urban Forestry Division. All tree plantings shall be installed to current tree planting standards when the City has previously been paid for tree plantings. The subdivider or contractor shall notify the Urban Forestry Division at: (213) 847-3077 upon completion of construction for tree planting direction and instructions.
 23. **Solar and Electric Generator.** Generators used during the construction process shall be electric or solar powered. Solar generator and electric generator equipment shall be located as far away from sensitive uses as feasible.

Or: Where power poles are available, electricity from power poles and/or solar-powered generators rather than temporary diesel or gasoline generators shall be used during construction. (WL)

24. **Solar-ready Buildings.** The Project shall comply with the Los Angeles Municipal Green Building Code, Section 99.05.211, to the satisfaction of the Department of Building and Safety.
25. **Signage.** There shall be no off-site commercial signage on construction fencing during construction.

Administrative Conditions

26. **Final Plans.** Prior to the issuance of any building permits for the project by the Department of Building and Safety, the applicant shall submit all final construction plans that are awaiting issuance of a building permit by the Department of Building and Safety for final review and approval by the Department of City Planning. All plans that are awaiting issuance of a building permit by the Department of Building and Safety shall be stamped by Department of City Planning staff "Plans Approved". A copy of the Plans Approved, supplied by the applicant, shall be retained in the subject case file.
27. **Notations on Plans.** Plans submitted to the Department of Building and Safety, for the purpose of processing a building permit application shall include all of the Conditions of Approval herein attached as a cover sheet, and shall include any modifications or notations required herein.
28. **Approval, Verification and Submittals.** Copies of any approvals, guarantees or verification of consultations, review of approval, plans, etc., as may be required by the subject conditions, shall be provided to the Department of City Planning prior to clearance of any building permits, for placement in the subject file.
29. **Code Compliance.** Use, area, height, and yard regulations of the zone classification of the subject property shall be complied with, except where granted conditions differ herein.
30. **Department of Building and Safety.** The granting of this determination by the Director of Planning does not in any way indicate full compliance with applicable provisions of the Los Angeles Municipal Code Chapter IX (Building Code). Any corrections and/or modifications to plans made subsequent to this determination by a Department of Building and Safety Plan Check Engineer that affect any part of the exterior design or appearance of the project as approved by the Director, and which are deemed necessary by the Department of Building and Safety for Building Code compliance, shall require a referral of the revised plans back to the Department of City Planning for additional review and sign-off prior to the issuance of any permit in connection with those plans.
31. **Enforcement.** Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Department of City Planning.
32. **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 (ii).
- (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 in paragraph (ii).
- (v) If the City determines it necessary to protect the City's interest, 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, commissions, 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/Waivers FINDINGS

1. Government Code Section 65915 and LAMC Section 12.22 A.25(c) state that the Commission shall approve a density bonus and requested incentive(s) unless the Commission finds that:

- a. *The incentives do not result in identifiable and actual cost reductions 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 City Planning Commission to make a finding that the requested incentives do not result in identifiable and actual cost reduction 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.

FAR Increase:

The subject site is zoned C1.5-1VL-CPIO and has a gross lot area of approximately 8,931 square feet which, with required setbacks, results in a net lot area of 6,130 square feet. The LAMC limits the maximum FAR to 1.5:1 which would permit 9,195 square feet of floor area. The applicant has requested an On-Menu Incentive to allow a **6:1** ~~5.1:1~~ FAR in lieu of the otherwise permitted 1.5:1 FAR, to permit **37,025** ~~31,263~~ square feet of floor area, as set forth in the following table:

	<i>FAR</i>	<i>Net Lot Area (sf)</i>	<i>Total Floor Area (sf)</i>
<i>By-right</i>	<i>1.5:1</i>	<i>6,130</i>	<i>9,195</i>
<i>Requested</i>	<i>6.1:1</i>	<i>6,130</i>	<u>37,025</u> 31,263
		<u><i>Net Increase</i></u>	<u>30,895</u> 22,068

The project proposes to construct 33 units, with 3 units reserved for Very Low Income households.

The additional FAR allows a larger building envelope and provides an additional **30,895** ~~22,068~~ square feet of income generating residential floor area than would otherwise be permitted. This additional floor area would enable the project to construct additional market-rate units, of a larger size, which would reduce the marginal cost of constructing the project's share of affordable units.

Of the 33 proposed units, there would be **20** 24 one-bedroom units, and **12** 40 two-bedroom units, and **1** 2 three-bedroom units. As set forth on Sheet A0.1 of the project plans, the project's upper residential levels (levels 3 through 7 **8**) would each have a floor plate of approximately 5,913 square feet. These large floor plates would not be achievable under the 1.5:1 base FAR and enable the project to construct the unit mix specified above. Without the incentive to permit additional floor area, the average unit size and bedroom count would have to be significantly smaller to construct the number of units that the requested density bonus allows. The ability to develop more units will increase the revenues from the market-rate units, which will lower the marginal cost of developing the affordable units. Therefore, the FAR incentive would result in identifiable and actual cost reductions to provide for the project's affordable housing costs.

LID

The Applicant proposes an incentive to waive the requirements of the Low Impact Development (LID)(Ordinance 181899 and 183833). LID would be required under the City of LA Ordinance for LID under Large Scale Requirements. The LID requirement would be cost-prohibitive to implement given the already high housing construction costs. In fact, after the main structure, plumbing and electrical work, the low-impact development requirements would be the priciest item to implement. Also note that a low-impact development requires planter areas that are not possible to provide given the setbacks of the project. The factors such as (a) record drought of the state, (b) costly construction cost of making deep barrels into the ground and providing permeable barriers, and (c) the lack of space to provide the necessary planters are considered in this project to conclude that a low-impact development is a necessary incentive for this project's success as a mixed-income housing project. Per Govt Code Section 65915 (k), an incentive means (1) A reduction in site development standards or a modification of zoning code requirements or architectural design requirements, (2) approval of mixed-use zoning and (3) other regulatory incentives or concessions proposed by the developer. A low-impact development happens to be regulation and this incentive is proposed as a regulatory incentive to reduce the development cost of a low-income housing project. Los Angeles Sanitation confirmed that the project does not trigger the state NPDES water permit requirements because it does not meet the threshold of the NPDES permit. Therefore it is dismissed without prejudice as it is not needed.

- b. The incentive(s) will have a specific adverse impact upon public health and safety or any real property that is listed in the California Register of Historical Resources and for which there are no feasible method 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 (Government Code Section 65915(d)(1)(B) and 65589.5(d)).**

There is no substantial evidence in the record that the proposed incentive(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)). As required by Section 12.22 A.25 (e)(2), the project meets the eligibility criterion that is required for density bonus projects. The project also 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. Therefore, there is no substantial evidence that the proposed incentive(s) will have a specific adverse impact on public health and safety. Analysis of the proposed Project determined that it is Categorically Exempt from

environmental review pursuant to Article 19, Class 32 (Infill) of the CEQA Guidelines. The Categorical Exemption (CE) could be adopted, including, on the basis that none of the potential environmental effects of the proposed Project would cause substantial adverse effects on human beings, on public health and safety, or on property listed in the California Register of Historic Resources. Based on all of the above, there is no basis to deny the requested incentive.

c. *The incentive(s) are contrary to state or federal law.*

There is no evidence in the record that the proposed incentives are contrary to state or federal law. The NDPES Water permit incentive in this case is a part of state law, however the project does not meet the threshold to trigger its requirements and therefore the applicant request is dismissed without prejudice and the incentive is therefore not contrary to state or federal law.

Following is a delineation of the findings related to the request for eight (8) Waivers of Development Standards, pursuant to Government Code Section 65915.

2. Government Code Section 65915 and LAMC Section 12.22 A.25(c) state that the Commission shall approve a density bonus and requested Waiver of Development Standard(s) unless the Commission finds that:

a. *The waiver(s) or reduction(s) of development standard(s) are contrary to state or federal law.*

There is no evidence in the record that the proposed waivers are contrary to state or federal law.

A project that provides 13 percent of base units for Very Low Income Households qualifies for two (2) Incentives, and may request other “waiver[s] or reduction[s] of development standards that will have the effect of physically precluding the construction of a development meeting the [affordable set-aside percentage] criteria of subdivision (b) at the densities or with the concessions or incentives permitted under [State Density Bonus Law]” (Government Code Section 65915(e)(1)).

Therefore, the requests below are recommended as a Waivers of Development Standards. Without the below Waivers, the existing development standards would preclude development of the proposed density bonus units and project amenities:

Height Increase:

The subject site is zoned C1.5-1VL-CPIO. Height District No. 1VL restricts building height to a maximum of 45 feet. The applicant has requested a **Waiver** incentive with respect to the CPIO building height limitation to permit a height of **89** ~~78 feet 4 inches~~ feet from grade to the top of the parapet.

The proposed building would be ~~seven~~ **eight** stories tall to accommodate the allowed density bonus and increased FAR. By contrast, if the base height limitation applied, it would only be possible to construct a four-story building (assuming a typical 12-foot ground level and three 10-foot residential levels). As noted above, each of the upper residential levels has an average floor plate of approximately 5,913 square feet. Therefore, the loss of **five** ~~four~~ residential levels would reduce the Project’s floor area by approximately **29,565** ~~23,652~~ square feet.

The loss of floor area would directly limit the project’s ability to construct residential dwelling units (including affordable units) as the top **five** ~~four~~ levels house **27** ~~24~~ units.

As proposed, the additional height will physically permit construction of the project at the permitted density and with the requested FAR incentive by expanding the allowable building envelope. The additional building envelope will allow for more market rate units that will subsidize the affordable units provided as part of the project, making the project financially feasible.

Transitional Height:

The South Los Angeles Implementation Overlay (CPIO) Section II-2.A.2 mandates that the project comply with transitional height requirements due to the site's adjacency to a residential lot located in the R2-1-CPIO zone. Specifically, the CPIO requires the project the entire building to be set back, or individual floors stepped back, one horizontal foot for every one vertical foot in building height as measured from 15 feet above grade at the residential property line. Because the proposal in question is for a Density Bonus Project, the transitional height is only in effect for the first 25 feet of depth from the residential property line abutting the site's northern edge.

The applicant has requested a Waiver of the transitional height requirements of the CPIO. Strict compliance with the CPIO transitional height requirements would physically preclude construction of the project at the permitted density bonus and with the permitted FAR and Height incentive. This is detailed on a Declaration Supporting Requested Incentives and Waivers submitted by the applicant as a supporting document (page 3, Exhibit H). In particular, denial of the requested waiver would require the removal of dwelling units on the upper floors in order to provide sufficient step backs from the abutting residential lot, thus physically impeding construction of the full requested 35 percent density bonus and additional 6:1 FAR increase from 1.5:1.

Side Yard Setbacks:

The project proposes a ~~eight- seven~~ story building, which would require 10-foot side yard setbacks per LAMC 12.13.5B.2. The applicant has requested a Waiver of Development Standard to permit side yard setbacks of 0 feet for the first and second floors, and 5 feet for the third to seventh floors. The requested waiver would allow the project to provide the required residential and commercial parking within its building envelope. The project will provide ~~20~~ 22 total parking spaces per AB 2345, government code 65915, at 0.5 spaces per bedroom. This parking is provided for in a building podium, with ~~10~~ 44 spaces at grade and another ~~10~~ 44 at the second story.

Without the requested incentive, some of the commercial parking and additional residential parking would have to be constructed underground; while the residential stories would likewise see a significant reduction in floor plate area. Therefore, the requested side yard setback waiver eliminates the need to construct additional underground parking, which physically impedes construction of the full requested 35 percent density bonus.

Rear Yard Setbacks:

The project proposes a ~~eight seven~~-story building, which would require ~~20~~ 49-foot rear yard setbacks per LAMC § 12.13 5B.2. The applicant has requested a Waiver of Development Standard to permit rear yard setbacks of 5 feet for the first and second floors, and 10 feet for the third to seventh floors. The requested waiver would allow the project to provide the required residential and commercial parking within its building envelope. The project will provide ~~20~~ 22 total parking spaces per AB 2345. This parking is provided for in a building podium, with ~~10~~ 44 spaces at grade and another ~~10~~ 44 at the second story.

Without the requested incentive, some of the commercial parking and additional residential parking would have to be constructed underground; while the residential stories would likewise see a significant reduction in floor plate area. Therefore, the requested side yard setback waiver, if denied, would physically impede construction of

the full requested 35 percent density bonus.

Open Space:

The project proposes 33 total units, consisting of twenty ~~one~~ **(20)** one-bedroom units, ten ~~twelve~~ **(12)** two-bedroom units, and ~~two~~ one **(1)** three-bedroom unit. Per LAMC § 12.21 G2, a project is required to provide 100 square feet for each unit having less than three habitable rooms; 125 square feet for each unit having three habitable rooms; and 175 square feet for each unit having more than three habitable rooms. In total, this requires the project to provide **3,675** square feet of open space. The applicant has requested a Waiver of Development Standard to permit **2,048** ~~4,500~~ square feet of open space, **in lieu of the required 3,675** ~~3,700~~ **square feet of open space**.

Without the requested incentive, and per the applicant's Declaration Supporting Requested Incentives and Waivers, the project will not be able to provide its unit total as Type III construction is limited to five stories above a concrete podium. As proposed, the project already consists of ~~five~~ **six** stories of Type III construction over a two-story concrete podium. Therefore, the requested open space reduction eliminates the need to construct additional levels of Type 1 construction, physically enabling construction of the full requested 35 percent density bonus.

Passageway Width:

Per LAMC § 12.21 C.2(b), "there shall be a passageway of at least 10 feet in width extending from a street to one entrance of each dwelling unit or guest room in every residential building... [and] The passageway shall be increased by two feet in width for each story over two contained in any building located between the public street and the building which the passageway serves." As the project proposes a eight-story building, the resultant passageway leading to the residential lobby would be 22 feet wide. The applicant has requested a Waiver of Development Standard to permit a **86** 40% reduction, with the resultant passageway being ~~42~~ **3** feet.

Without the requested Waiver and per the applicant's Declaration Supporting Requested Incentives and Waivers, the project will not be able to provide its commercial component and accommodate the necessary driveway width for vehicular access to its at-grade and second story parking. Further, the Bureau of Engineering requirement of a landing space of 20 feet by 20 feet in front of the driveway for the transformer would preclude a portion of the passageway (walking access on top on of the transformer is not allowed for safety reasons by the Department of Water and Power). Therefore, the requested passageway width waiver eliminates the need to construct additional underground parking, which would physically impede construction of the full requested 35 percent density bonus.

Commercial Frontage:

In order to qualify for an exemption from a conditional use approval under LAMC § 12.22 A.23(d), the subject proposal needs to meet the definition of a Mixed Use Project. Per LAMC § 13.09 B.3, this is defined as a project combining one or more Commercial Uses and multiple dwelling units in a single building or in a Unified Development and which provides the following:

- (1) separate, Ground Floor entrance to the residential component, or a lobby that serves both the residential and Commercial Uses components; and
- (2) A pedestrian entrance to the Commercial Uses component that is directly accessible from a public street, and that is open during the normal business hours posted by the business.

A minimum of 35 percent of the Ground Floor Building Frontage abutting a public commercially zoned street, excluding driveways or pedestrian

entrances, must be designed to accommodate Commercial Uses to a minimum depth of 25 feet.

Per Exhibit A, the project will provide one commercial unit and multiple dwelling units in a single building. This includes a separate entrance for the residential (via a residential lobby) and commercial components. Both will be directly accessible from the project's only street frontage off of Gramercy Place. As the street frontage of the subject site is 50 feet, the required width of the commercial frontage would be 17.5 feet. The applicant has requested a Waiver of Development Standard to permit a 43% reduction, with the resultant commercial frontage being 10 feet.

Without the requested incentive, and per the applicant's Declaration Supporting Requested Incentives and Waivers (Exhibit H), the project will not be able to provide its commercial component and accommodate the necessary driveway width for vehicular access to its at-grade and second story parking. Therefore, the requested commercial frontage waiver eliminates the need to construct additional underground parking, which would physically impede construction of the full requested 35 percent density bonus.

Landscape Buffer:

The South Los Angeles CPIO Section II-2.C.4 mandates that the project include a 5 foot landscape buffer, to "be provided between the Project site and any abutting lot zoned RD1.5 or a more restrictive zone." This 5-foot landscape buffer is required along the northern edge of the site, which abuts the RD2-1-CPIO zone. The applicant has requested a Waiver of this landscape buffer in its entirety.

Without the requested incentive, and per the applicant's Declaration Supporting Requested Incentives and Waivers (Exhibit H), the project will not be able to provide a 3 foot 8 inch clear passageway, required for egress from the building's rear stairwell. Reserving an additional five feet of the site's width for this landscape buffer would also prevent the design from accommodating its commercial frontage and lobby passageway components, both of which have already been reduced (see waiver findings above). Alternately, the buffer would eat into the necessary driveway width for vehicular access to its at-grade and second story parking. Therefore, the requested Landscape buffer waiver eliminates the need to construct additional underground parking, which would physically impede construction of the full requested 35 percent density bonus.

Ground Floor Height:

The South Los Angeles CPIO Section II-2.A.1(b) mandates that "the Ground Floor shall have a minimum height of 14 feet, measured from the finished floor to the underside of the structural floor... above." It also stipulates that, "for Projects with Active Floor Area, the Ground Floor shall have a minimum height of 11 feet, measured from the finished floor to the finished ceiling." While the project provides Active Floor Area in the form of a commercial space, the 14 foot minimum height still prevails. The applicant has requested a Waiver to reduce the clearance height to 10 feet ~~5 inches~~.

Without the requested incentive, and per the applicant's Declaration Supporting Requested Incentives and Waivers (Exhibit H), the project will not be able to provide sufficient clearance in plan for the access ramp leading to the second story parking level. Therefore, the requested Ground Floor height waiver would physically enable construction of the full requested 35 percent density bonus.

- b. The waiver will have specific adverse impact upon public health and safety or on any real property that is listed in the California Register of Historical Resources and for which there is no feasible method 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 substantial evidence in the record that the proposed 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)). As required by Section 12.22 A.25 (e)(2), the project meets the eligibility criterion that is required for density bonus projects. The project also 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. The project does not involve the demolition of a historic structure that was placed on a national, state, or local historic register prior to the submission of the application. Therefore, there is no substantial evidence that the proposed waivers of development standards will have a specific adverse impact on public health and safety.

c. ***The incentive(s) are contrary to state or federal law.***

There is no evidence in the record that the proposed incentives are contrary to state or federal law.

CEQA FINDINGS

CEQA Determination – Class 32 Categorical Exemption Applies

The project qualifies for a Class 32 Exemption if it is developed on an infill site and meets the following criteria:

A. The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations:

The proposed Project supports the goals, objectives and policy of the Land Use Element of the General Plan by providing affordable housing within a neighborhood-serving commercial district proximate to a variety of neighborhood-serving commercial uses, including being located proximate to public transit on an underutilized site, zoned C1.5-1VL-CPIO and designated for community commercial purposes.

The Project will activate street presence, and provide a mixed-income housing project, which will in turn support surrounding commercial and residential uses.

The Project will help reduce reliance on the demand for automobile vehicles and will reduce the number of trips to and from the site due to its location in proximity to neighborhood-serving amenities, employment opportunities and public transit options.

B. The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses:

The Subject Property is located at 1848 S. Gramercy, Los Angeles, CA 90019. The combined surface land area for the rectangular-shaped property is approximately 8,931 square feet, according to a survey completed on February 12, 2018. The Property is currently developed with a single, three-story residential structure.

Properties in the surrounding area are characterized by a mix of residential uses ranging from one- and two-story residential buildings as well as single-story neighborhood-serving commercial uses. Properties surrounding the Project Site are within the RD2-1-CPIO and C1.5-1VL-CPIO Zones, and are generally a mix of commercial uses at the intersection of Washington Boulevard and Gramercy Place surrounded by a range of one- and two-story residential buildings. To the west along Gramercy Place is a complex of four-story apartment buildings. The property located at to the south and across Washington Boulevard is developed with an automobile tire and repair shop.

C. The project site has no value as habitat for endangered, rare or threatened species:

The project is situated in an established, fully-developed, residential and commercial neighborhood adjacent to several commercial corridors, large boulevards and other large employment centers. The project site has no value as a habitat for endangered, rare or threatened species.

D. Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality:

TRAFFIC:

As an infill development site, the Subject Property has existing access to community resources, particularly public transportation. The Property is located within a Transit Priority Area and a Tier 2 Transit Oriented Communities Affordable Housing Incentive Area. Additionally, the stop for Metro Local Bus Line 35 is located close to the site, adjacent to a LADOT Midtown line stop. Within a ¼ mile of the site is the intersection of Washington Boulevard and Western Avenue, with the stop for Metro Local Bus Line 207. The existing mobility and circulation available in near proximity to the proposed project will lessen the increase of traffic in the area.

NOISE:

The project must comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574 and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels. The Ordinances cover both operational noise levels (i.e. post-construction), as well as any noise impact during construction. As a result of the project being required to comply with said ordinances, it can be found that the project would not result in any significant noise impacts.

AIR QUALITY:

The proposed project for 33 dwelling units is not expected to result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainable under an applicable federal or state ambient air quality standard. 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. More specifically, RCMs include but are not limited to:

- **Regulatory Compliance Measure RC-AQ-1(Demolition, Grading and Construction Activities):** Compliance with provisions of the SCAQMD District Rule 403. The project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403:
 - All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
 - The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
 - All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
 - All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
 - All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
 - General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
 - Trucks having no current hauling activity shall not idle but be turned off.

- **Regulatory Compliance Measure RC-GEO-1 (Seismic):** The design and construction of the project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety.
- **Regulatory Compliance Measure RC-NO-1 (Demolition, Grading, and Construction Activities):** The project shall comply with the City of Los Angeles Noise Ordinance and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.
- **Regulatory Compliance Measure RC-NO-1 (Demolition, Grading, and Construction Activities):** The project shall comply with the City of Los Angeles Noise Ordinance and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

These RCMs will reduce any potential impacts to less than significant, and will ensure the project will not have significant impacts on noise and water.

Furthermore, the project does not exceed the threshold criteria established by the LADOT for preparing a traffic study. As such, the project will not have any significant impacts to traffic. In regards to Air Quality, Interim thresholds were developed by the Los Angeles Department of City Planning staff based on California Emissions Estimator Model (CalEEMod) 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.

WATER:

Lastly, the project is not adjacent to any water sources and the construction of said project where it is surrounded by very similar and more dense projects will not create any impact to water quality. No further study is anticipated.

E. The site can be adequately served by all required utilities and public services:

The site is currently being served adequately by the City's Department of Water and Power, the City's Bureau of Sanitation, the SoCal Gas Company, the Los Angeles Police Department, the Los Angeles Fire Department, and many others public services. The utilities and public services have been servicing the neighborhood continuously for over 50 years. The California Green Code requires new construction to meet stringent efficiency standards for both water and power, such as high-efficiency toilets, dual-flush water closets, minimum irrigation standards, LED lighting, etc.

The project can be characterized as in-fill development within urban areas for the purpose of qualifying for Class 32 Categorical Exemption as a result of meeting the five conditions listed above.

CEQA Section 15300.2 – Exceptions to the use of Categorical Exemptions

- A. Cumulative Impacts. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.**

The Property is located within the C1.5-1VL-CPIO Zone and in Subarea A (“Neighborhood-Serving Corridor”) of the South Los Angeles Community Plan area, being designated for Neighborhood Commercial land uses. As such, the cumulative impacts of the project and successive projects of the same type in the same place have been evaluated and accommodated in the zoning designation.

Additionally, there have been no similar projects approved within a 500-foot radius of the subject site. As such, the subject site is the only site that will be developed into a multi-family residential building through the application of Density Bonus incentives in the surrounding area. Therefore, there is not a succession of known projects of the same type and scale as the proposed Project.

B. Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

The Property occupies a single-frontage lot near a street corner located at the intersections of Washington Boulevard and Gramercy Place, and is currently developed with two story, single-family residential structure. The proposed Project conforms to the existing General Plan and zoning designation for the subject site.

There is no evidence in the record that the project will have a significant environmental impact. The project size and height is not unusual for the broader vicinity of the subject site. The Project Site is located within a developed and urban area, as such, there are no unusual circumstances that would create the reasonable possibility of significant effects.

C. Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway.

The Project Site is located within a developed and urban area, as such, there are no scenic resources, including trees, historic buildings, rock outcroppings or similar resources, and is not located on an officially designated scenic highway per the City’s Bureau of Engineering website, NavigateLA.

D. Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

According to Envirostar, the State of California’s database of Hazardous Waste Sites, the subject site is not identified as a hazardous waste site.

Therefore, the Project Site is not located on a site the Department of Toxic Substances Control and the Secretary of the Environmental Protection have identified, pursuant to Government Code section 65962.5, as being affected by hazardous wastes or clean-up problems.

E. Historical Resources. A categorized exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

Neither the project site itself nor any of the existing structures on the project site have been identified as a historic resource by local or state agencies. On May 5, 2018, a

application was filed (per case CHC-2018-3217-HCM) to declare the property an Historic-Cultural Monument. City Planning Staff recommended that the Cultural Heritage Commission not declare the property an Historic-Cultural Monument per Los Angeles Administrative Code, Chapter 9, Division 22, Article 1, Section 22.171.7. At a hearing on July 15, 2018, the Commission determined the project site is not eligible for listing in the National Register of Historic Places, California Register of Historical Resources, the Los Angeles Historic-Cultural Monuments Register, and/or any local register. Further, the project site was not found to be a potential historic resource based on the City's HistoricPlacesLA website or SurveyLA, the citywide survey of Los Angeles. Neither the State nor the City consider the site a historic resource, therefore, the proposed project cannot cause a substantial adverse change in the significance of a historical resource and this exception does not apply.

Additionally, the Project Site is located within a developed and urban area, as such, will not cause a substantial adverse change in the significance of an historical resource.

Therefore, the Project is exempt from the California Environmental Quality Act (CEQA) pursuant to State CEQA Guidelines, Article 19, 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.

PUBLIC HEARING AND COMMUNICATIONS

PUBLIC HEARING

The public hearing was held on August 23, 2021 at approximately 3:30 pm telephonically via Zoom In conformance with the Governor's Executive Order N-29-20 (March 17, 2020). The hearing was conducted by the Hearing Officer, Sergio Ibarra, on behalf of the City Planning Commission in taking testimony for Case No. CPC-2020-2115-DB-HCA. All interested parties were invited to attend the public hearing at which they could listen, ask questions, or present testimony regarding the project. The purpose of the hearing was to obtain testimony from affected and/or interested parties regarding this application. Interested parties are also invited to submit written comments regarding the request prior to hearing. The environmental determination was among the matters considered at the hearing.

The public hearing was attended by the applicant's representative (Akhilesh Jha) and architect (Hamid Degnan), and approximately twenty (20) members from the community. Fifteen (15) members of the public spoke at the hearing.

Applicant Presentation:

The applicant's representative described the site location, project description, requested entitlements, and community outreach, which was ongoing.

There were Fifteen (15) comments in opposition to the project. Objections raised included concerns about the amount of incentives requested, the FAR of the project, the height of the project, the preservation of existing housing, and privacy for neighbors immediately north of the project.

WRITTEN CORRESPONDENCE

On August 12, 2021, planning received a letter from Dolores Spears and John Arnold of the United Neighborhoods Neighborhood Council expressing opposition to the project.

On August 21, 2021, planning received a letter from Jean Frost of the West Adams Heritage Association expressing opposition to the project.

On August 23, 2021, planning received a letter from Laura Meyers expressing opposition to the project.

On August 26, 2021, planning received an email from Grace E. Yoo expressing opposition to the project.

On March 17, 2022, planning received a letter from John Arnold, representing the UNNC, expressing opposition to the project.

On March 18, 2022, planning received a letter from David Kendrick, Catherin Doyle, and family, expressing opposition to the project.

On March 21, 2022, planning received letters from Grace E. Yoo, Jim Childs, Jean Frost, Laura Meyers, and Roland Souza (representing the West Adams Heritage Association) expressing opposition to the project.

On March 21, 2022, planning received letters from Ann Marie Brooks, Leonora Camner, Jaime Del Rio, and Tami Kagan-Abrams (the latter three representing Abundant Housing LA) expressing support for the project.

On March 22, 2022, planning received a letter from David Raposa expressing opposition to the project.

On March 23, 2022, planning received letters from Benjamin Steen, Natalie Neith, Stormie Leoni, Christine Carlson and Demetrius Pohl, expressing opposition to the project.

On March 24, 2022, planning received a letter from Jehu Salazar expressing support for the project.

The letters and emails raised concerns with respect to the appropriateness of a Categorical Exemption, the number of Waivers of Development standards requested, in addition to the excessive, size, scale, and density of the proposed project. Objections also stressed the need to avoid displacement and verify the need for affordable unit replacement with the Los Angeles Housing Department. Statements of support primarily cited the need for more housing generally.