

## FINDINGS

### General Plan/Charter Findings

1. **General Plan Land Use Designation.** The Project Site, located generally at 412-426 Crocker Street and 411-425 Towne Avenue, is within the Central City Community Plan, which was last updated by the City Council on January 8, 2003. The site is irregularly-shaped, comprised of multiple parcels and 35,767 gross square feet of lot area. The Community Plan designates the site with a land use designation of Light Manufacturing, which lists the MR2 and M2 Zones as corresponding zones.

As recommended, the amendment would re-designate the Project Site to the Regional Commercial land use designation, which lists the following corresponding zones: CR, C1.5, C2, C4, C5, R3, R4, R5, RAS3, and RAS4. Footnote No. 3 of the Community Plan indicates that the corresponding Height Districts for the Regional Commercial land use designation are Height Districts 3D and 4D, with Development "D" Limitations limiting the floor area ratio (FAR) to 6:1, except for those projects which are approved a transfer of floor area. Those projects which are approved a transfer of floor area are permitted to have a maximum 10:1 or 13:1 FAR, respectively. The recommended change to the Zone and Height District to [T][Q]C2-4D for the site would be consistent with the adoption of the recommended Plan Amendment and would be in substantial conformance with the purpose, intent, and provisions of the General Plan as it is reflected within the Central City Community Plan.

2. **Charter Finding – City Charter Finding 555.** The General Plan may be amended in its entirety, by subject elements or parts of subject elements, or by geographic areas, provided that the part or area involved has significant social, economic or physical identity.

The Project Site is located within the Central City Community Plan area, located mid-block to the south of 4th Street with approximately 175 feet of street frontage on Crocker Street and approximately 150 feet of street frontage on Towne Avenue. There are seven (7) parcels that front Crocker Street and six (6) parcels that front Towne Avenue. The Project Site is improved with a one-story food processing plant building constructed in 1978 and was used as the Umeya Inc. factory until 2017.

The site is located within the Central City East district, as identified by the Central City Community Plan text. The Community Plan describes the district as being developed with general commercial uses, and manufacturing uses such as wholesale, warehouses, and food processing. Within the Central City East district, the project site is within the Skid Row neighborhood. The area is developed with approximately 6,500 SRO hotels units, which have been identified as the primary source of housing for the area. In addition to the light manufacturing and SRO hotels, the area is a center of social services that provides supportive services such as: transitional housing, homeless outreach, family and children's services, aging programs, job training programs, as well as mental health services. The Central City East district is comprised of buildings that range in height from one- to six-story buildings that are utilized for supportive services, residential, commercial or light manufacturing uses. The unique development of the residential, commercial, and manufacturing uses interspersed with one another has established a social, economic, and physical identity for this portion of the Central City East district.

The site is within the Skid Row portion of the Central City East district and has a significant social, economic, and physical identity in the City. It is a unique residential neighborhood that has long served people in need. The community is home to family and social services, permanent supportive housing, single room occupancy hotels, as well as homeless community members, in addition to commercial and industrial uses. While the land use designation for the area is Light Manufacturing, the actual uses present in the area include a mix of commercial, industrial, and residential uses mainly comprised of single room occupancy residential uses. Most of the existing housing is legal nonconforming. Thus, while the land use designation and zoning denote light manufacturing uses in this area, there are still many residential uses in operation. The recommended change in land use would allow for the introduction of additional residential uses in the form of covenanted restricted affordable housing units in an area that already supports legal non-conforming residential uses for the area's vulnerable and unhoused populations. The change in the land use designation will further the social and physical identity of Skid Row as a residential neighborhood supporting vulnerable populations along with a mix of commercial and industrial uses already present.

The amendment to re-designate the site to Regional Commercial would allow it to be redeveloped with a new mixed-use development that would consist primarily of Restricted Affordable housing. As the surrounding area is developed with a mixture of residential, commercial, and light manufacturing uses, the amendment would not be introducing an incompatible use to the area. Properties to the west are improved with the 145 unit live-work Little Tokyo Lofts (420-426 San Pedro Street). Properties to the southwest, west of San Pedro Street and south of 5<sup>th</sup> Street have a land use designation of High Medium Residential and are zoned [Q]R5-2D, which would permit residential uses by-right. These properties are developed with the Midnight Mission (601 San Pedro Street), a homeless services organization, and a 115-unit affordable housing project (625 San Pedro Street). To the south, between 5<sup>th</sup> and 6<sup>th</sup> Streets is the Weingart Center (600 San Pedro Street), which was approved for a general plan amendment to the Regional Commercial land use designation and the [T][Q]C2-2D Zone, similar to what is proposed on the subject site. That project will introduce 382 units as a 100 percent affordable housing project, along with another 302 restricted affordable housing project on San Pedro Street, south of 6<sup>th</sup> Street.

The Project proposes to redevelop the site which is presently a vacant food processing facility with 175-residential dwelling units, 8,691 square feet of commercial floor area, and proposes to provide on-site residential supportive services. The building will include 8,691 square feet of commercial office space, as well as residential supportive services such as intensive case management, life and job skills training, workforce development, and housing retention training. The Project would provide improvements along the public right-of-way, as well as allow for the new construction of housing in an area where housing has primarily been located in buildings constructed in the early 1900s. The recommended General Plan Amendment to re-designate the Project Site from Light Manufacturing to Regional Commercial would allow the site to be developed as a mixed-use development, with Restricted Affordable Units, that is consistent with the development and furthers the social, economic, and physical identity of the Skid Row area and a number of objectives and policies of the General Plan.

- 3. Charter Finding – City Charter Finding 556.** The proposed Amendment is in substantial conformance with the purposes, intent and provisions of the General Plan.

The Project Site is located within the Central City Community Plan area, which is one of 35 community plans that the Land Use Element of the General Plan is comprised of. The Community Plan designates the site with a land use designation of Light Manufacturing, which lists the following corresponding zones: MR2 and M2. The site is presently zoned M2-2D, which is consistent with the existing land use designation.

As recommended, the amendment would re-designate the Project Site from Light Manufacturing to Regional Commercial. The amendment of the land use designation, in conjunction with the recommended zone and height district change to [T][Q]C2-4D, would allow the redevelopment of the site with a new affordable housing project and commercial floor area. The site is located within an area that is designated and zoned for manufacturing uses, but has been developed and continually utilized with a mixture of residential, commercial, and light manufacturing uses. The ability to rehabilitate or redevelop the existing residential development in the area is limited, as residential uses are not permitted by-right in the existing land use designation and zone. The amendment, zone change, and height district change would allow the redevelopment of the site with 175 Restrict Affordable dwelling units for Extremely Low Income and Very Low Income households, with supportive services. As further discussed in Finding Nos. 5 through 10, the amendment of the land use designation would be consistent with the purpose, intent and provisions of the General Plan.

In January 2008, the Department of City Planning (DCP) and CRA/LA issued a memorandum referred to as the Industrial Land Use Policy Project (ILUP). The ILUP studied land within different parts of the City and categorized them into one of four typologies: Employment Protection Districts, Industrial Mixed Use Districts, Transitional Districts, and Correction Areas. The ILUP provides short- and long- term direction related to the preservation of industrial land uses for the City as a whole, with consideration of the existing conditions of the geographic area and the objectives and policies of the applicable Community Plan area. The Project Site was categorized as being part of the Employment Protection District within the Central City – Downtown: Analysis Area 10. The boundaries of Analysis Area 10 generally coincide with the Central City East District, as identified in the Community Plan, which is described as being interspersed with residential, supportive services, commercial, and light industrial uses. The Community Plan identifies a need to not only preserve existing industrial uses, but to preserve existing affordable housing options and to allow for the development of new affordable housing. Specifically, the Community Plan identifies a need to provide “affordable infill housing east of San Pedro Street, in areas of existing housing clusters.”<sup>1</sup>

While the requested amendment to the land use designation would re-designate the site from Light Manufacturing to a Regional Commercial land use designation, and the Project is not one called out in the ILUP to be converted for residential use, the Project would be consistent with the overall direction provided by the ILUP for this specific geographic area to allow permanent supportive housing and assure no net loss of affordable housing, and would be consistent with the Community Plan’s objectives for affordable housing.

- 4. Charter Finding – City Charter Finding 558.** The proposed Amendment to the Central City Community Plan will be in conformance with public necessity, convenience, general welfare and good zoning practice.

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<sup>1</sup> Page III-15 of the Central City Community Plan

The recommended amendment to the Central City Community Plan would re-designate the land use designation of the Project Site from Light Manufacturing to Regional Commercial. In conjunction with the recommended amendment, the recommended Vesting Zone Change and Height District Change from M2-2D to [T][Q]C2-4D would permit the development of the Project Site a 175-unit affordable housing project to 8,691 square feet of commercial/office floor area, and up to 4,503 square feet of residential supportive services and community space for project tenants.

#### Public Necessity, Convenience, and General Welfare

The Project Site has a land use designation of Light Manufacturing and is zoned M2-2D, which would prohibit the development of new residential uses on the site. The Project proposes to redevelop the site which is presently a vacant food processing facility with 175-residential dwelling units, 8,691 square feet of commercial floor area, and proposes to provide on-site residential supportive services. As the existing land use designation and zone would not permit new residential development, the amendment is necessary to permit the redevelopment of an underdeveloped and underutilized site with a residential use.

On April 8, 2015, Mayor Eric Garcetti released the Sustainable City pLAN, a roadmap to achieve short-term results while setting the path to strengthen the transformation of the City in the decades to come. As part of the plan, the Mayor set forth a goal of creating 100,000 new housing units by 2021. The plan highlights the need to minimize the loss of affordable housing and the need to increase the production of affordable housing. The amendment would allow the site to be redeveloped and to provide 175 additional units to the housing market, including 173 affordable units. The Project would be an infill development within an area of the City that is developed with a mixture of residential, commercial, and light manufacturing uses. As described by the Community Plan, existing SRO units provide the primary source of housing for the area. The amendment would not only introduce new housing, but would also allow for housing to be provided in new construction, which has been limited in the area. Additionally, due to the unique nature of the surrounding area, the Project would place housing within close proximity to commercial and light manufacturing jobs, as well as near public transit. Additionally, the Project has been designed with a ground floor outdoor courtyard, providing connectivity from Crocker Street, to the west, to Towne Avenue, to the east through a lobby. Amenity spaces, such as a food court and community center are proposed. In total, the proposed project would provide 7,291 square feet of open space, which would include new landscaping and planting of trees on-site, as well as a kid's play area. As proposed, the Project would improve the livability and general welfare of the future residents of the development.

#### Good Zoning Practice

The Project Site is designated by the Community Plan for Light Manufacturing land uses and is zoned M2-2D. As zoned, it is consistent with the existing land use designation. The properties to the north, south, and east are designated and zoned for light manufacturing uses; however, many of the properties in the area have remained developed with SRO buildings and utilized for residential purposes. Presently, the existing residential use in the surrounding area to the south are non-conforming and would not be permitted within the existing land use designation and zone. The properties to the west and north have a Light Manufacturing Land Use designation. The land use designation one block north beyond Third Street and one block west beyond San Pedro Street are Regional Commercial and Community Commercial and High Medium Residential, with zoning designations of R5-4D-

CDO, C2-2D and [Q]R5-2D, all which would permit residential uses by-right. Properties directly to the west are improved with the 145 unit live-work Little Tokyo Lofts (420-426 San Pedro Street). Properties to the southwest, west of San Pedro Street and south of 5<sup>th</sup> Street have a land use designation of High Medium Residential and are zoned [Q]R5-2D, which would permit residential uses by-right. These properties are developed with the Midnight Mission (601 San Pedro Street), a homeless services organization, and a 115-unit affordable housing project (625 San Pedro Street). To the south, between 5<sup>th</sup> and 6<sup>th</sup> Streets is the Weingart Center (600 San Pedro Street), which was approved for a general plan amendment to the Regional Commercial land use designation and the [T][Q]C2-2D Zone, similar to what is proposed on the subject site. That project will introduce 382 units as a 100 percent affordable housing project, along with another 302 restricted affordable housing project on San Pedro Street, south of 6<sup>th</sup> Street. The amendment to re-designate the site to Regional Commercial would allow it to be redeveloped with a new mixed-use development that would consist primarily of Restricted Affordable housing. As the surrounding area is developed with a mixture of residential, commercial, and light manufacturing uses, the amendment would not be introducing an incompatible use to the area. As described in Finding No. 5, the amendment would allow the development of the site with residential and commercial uses that are consistent with the objectives and policies of the Community Plan and would be mutually compatible and supportive of one another.

5. **General Plan Text.** The Central City Community Plan text includes the following relevant objectives, policies, and programs:

*Objective 9-1:* To address the problems of the homeless population by creating a mix of policies, services and facilities that better serve their needs.

*Policy 9.1-1:* Preserve the existing affordable housing stock through rehabilitation and develop new affordable housing options.

Program: Retain and develop new supported housing opportunities for homeless people.

Program: Continue the rehabilitation of existing housing under nonprofit ownership and management. In the area west of San Pedro Street, allow new housing which is affordable to neighborhood residents. Provide affordable infill housing east of San Pedro Street, in areas of existing housing clusters.

In addition to the above referenced objectives, policies, and programs, one of the residential issues identified by the Community Plan is the lack of affordable housing to support those employed in the industrial sector.

The Project Site is located within the Central City East district of the City, as described in the Community Plan text. As described by the Community Plan, the district is characterized by manufacturing uses such as wholesale and warehousing uses, and a mixture of other commercial uses. Additionally, the district is developed with approximately 6,500 SRO hotel units which “are the primary source of housing for the area.”<sup>2</sup> In addition to the manufacturing, commercial, and residential uses in the area, the area is developed with a number of social services which include job training programs, transitional housing,

<sup>2</sup> Page I-10 of the Central City Community Plan

homeless outreach, and various other services and programs to assist those in need of employment and housing assistances.

The site is located along the eastern side of Crocker Street, in an area where SRO developments are interspersed with the existing commercial and manufacturing uses in the M2 Zone. The Project Site is currently developed with a vacant food processing. The redevelopment of the site would not remove any existing SRO units and would develop the site with a Project containing 175 residential dwelling units and 8,691 square feet of commercial floor area development. Of the 175 units, 9 units will be set aside for Extremely Low Income Households and 1464 units for Very Low and 18 units for Low Income Households. The remaining two (2) units would be utilized as manager units. In addition to providing additional affordable housing opportunities, the Project would include on-site residential supportive services for future residents. Approximately 5,000 square feet of floor area would be utilized to provide on-site residential support services. Additionally, the Project would place new housing within close proximity to commercial and light manufacturing jobs, as well as near public transit. The existing land use designation and M2-2D Zone limits the ability to redevelop the site with a use that would be consistent with the above referenced objectives and policies of the Community Plan.

The recommended amendment to re-designate the site to the Regional Commercial land use designation and recommended zone and height district change to [T][Q]C2-4D would allow the site to be redeveloped with the Project as proposed. The project would not remove any existing SRO or affordable units from the market and would add 175 units (173 restricted units) to the market. The Project is proposed as a 100 percent affordable housing project which will set aside units for three (3) different income levels, with two (2) of the units being utilized as manager units. By setting aside units for Extremely Low, Very Low and Low Income households, the Project would be able to provide housing for individuals that are in different stages of their livelihoods, potentially also allowing individuals to grow in place as they transition from one income level to the next. As previously described, the site is located within an area which is developed with residential, commercial, and light manufacturing uses. The redevelopment of the site with additional affordable housing units would place future residents within proximity to employment opportunities, including those within the industrial sector. As recommended, the General Plan Amendment to the land use designation from Light Manufacturing to Regional Commercial, and the Vesting Zone Change and Height District Change to [T][Q]C2-4D would be consistent with the above referenced objectives, policies, and programs of the Central City Community Plan.

6. **Framework Element.** The Framework Element for the General Plan (Framework Element) was adopted by the City of Los Angeles in December 1996 and re-adopted in August 2001. The Framework Element provides guidance regarding policy issues for the entire City of Los Angeles, including the project site. The Framework Element also sets forth a Citywide comprehensive long-range growth strategy and defines Citywide policies regarding such issues as land use, housing, urban form, neighborhood design, open space, economic development, transportation, infrastructure, and public services. The Framework Element includes the following provisions, objectives and policies relevant to the instant request:

#### Land Use

**GOAL 3C:** Multi-family neighborhoods that enhance the quality of life for the City's existing and future residents.

**Objective 3.7: Provide for the stability and enhancement of multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained or improved.**

### Economic Development

**GOAL 7G:** A range of housing opportunities in the City.

**Objective 7.9: Ensure that the available range of housing opportunities is sufficient, in terms of location, concentration, type, size, price/rent range, access to local services and access to transportation, to accommodate future population growth and to enable a reasonable portion of the City's work force to both live and work in the City.**

**Policy 7.9.1:** Promote the provision of affordable housing through means which require minimal subsidy levels and which, therefore, are less detrimental to the City's fiscal structure.

As described in Finding No. 5, the Central City East district was developed with a number of SRO buildings constructed in the early 1900s and represents the main type of housing in the area. Despite the designation for light manufacturing land uses, the area has continued to maintain the existing residential uses alongside the warehouse and commercial uses. While the M2 Zone would permit the rehabilitation or new construction of light manufacturing and commercial uses, the ability to rehabilitate existing residential buildings is limited and new construction of housing would not be permitted on the site. As recommended, the Regional Commercial land use designation and C2 Zone would enable the redevelopment of the underutilized site with a residential development that would provide Restricted Affordable dwelling units, as well as providing a new general commercial space. Additionally, the applicant proposes to provide on-site residential supportive services which would include intensive case management, life and job skills training, workforce development, and housing retention training for future residents of the Project. Although the Project Site is not located within the "traditional" multi-family neighborhood, the site is located within an area that is developed with live work housing to the west and multi-family housing in the area generally, known as SRO units, which have served to provide affordable housing. The redevelopment of the site would introduce new Restricted Affordable Units, along with on-site supportive services, while also improving the livability of its future residents by providing on-site open space and landscaping. As recommended, the use would be compatible with existing development in the area which consists of residential, commercial, and light manufacturing uses, and would be consistent with the above referenced goals, objectives, and policies, of the Framework Element.

- 7. Housing Element.** The Housing Element of the General Plan contains the following relevant goals, objectives, and policies:

**GOAL 1:** Housing production and preservation.

**Objective 1.1:** Produce an adequate supply of rental and ownership housing in order to meet current and projected needs.

*Policy 1.1.2:* Expand affordable rental housing for all income groups that need assistance.

*Policy 1.1.3:* Facilitate new construction and preservation of a range of different housing types that address the particular needs of the City's households.

GOAL 4: Ending and Preventing Homelessness.

Objective 4.1: Provide an adequate supply of short-term and permanent housing and services throughout the City that are appropriate and meet the specific needs of all persons who are homeless or at risk of homelessness.

*Policy 4.1.3:* Provide permanent supportive housing options with services for homeless persons and person/families at risk of homelessness to ensure that they remain housed and get the individualized help they may need.

As previously discussed, the site is designated for light manufacturing uses and would no longer permit the development of new residential uses. The existing SRO residential buildings in the surrounding areas would no longer be permitted and the ability to rehabilitate or convert buildings are limited. The recommended Regional Commercial land use designation and the recommended [T][Q]C2-4D Zone would allow for the Project Site to be redeveloped with a new 100 percent affordable housing project. The Project proposes to designate two (2) units as manager units and the remaining 173 of the proposed 175 dwelling units to be set aside as Restricted Affordable units for Extremely Low, Very Low, and Low Income households. The redevelopment of the site with affordable rental units would introduce a new housing opportunity within a newly constructed building to individuals of different income levels. As such, the recommended amendment, and zone and height district change would be consistent with Goals No. 1 and 4 of the Housing Element, as well as the objectives and policies.

GOAL 2: Safe, Livable, and Sustainable Neighborhoods.

Objective 2.1: Promote safety and health within neighborhoods.

Objective 2.3: Promote sustainable buildings, which minimize adverse effects on the environment and minimize the use of non-renewable resources.

*Policy 2.3.3:* Promote and facilitate the reduction of energy consumption in new and existing housing.

The Project Site has frontage along the eastern side of Crocker Street and the western side of Towne Avenue. The proposed Project would be one of the first new major developments in the area, which has seen very little new development to the east of San Pedro Street. The Project would remove a vacant food processing building and construct a new building which would meet current building code requirements for safety. Although the Project is primarily a residential building, the ground floor will include approximately 8,691 square feet of commercial floor area accessible from Crocker Street and Towne Avenue. The ground floor has been designed to create an active ground floor presence with the use of

transparent materials and clerestory windows along both street frontages. As recommended, the Project would be consistent with the above referenced goals, objectives, and policies.

8. **Mobility Element.** The Mobility Element of the General Plan is not likely to be affected by the recommended action herein. The proposed project, with the requested General Plan Amendment and Vesting Zone Change, proposes to construct a new mixed-use building consisting of 175 residential dwelling units and 8,691 square feet of commercial floor area. Crocker Street is a designated Collector Street with a varying width of 60 to 62 feet at the project site's street frontage, and is improved with sidewalks, curb and gutter, and street trees. Towne Avenue is a designated Collector Street with a half right of way of 30 feet and is fully improved with a 9-foot sidewalk. The project will be required to dedicate and improve the public right-of-way to the satisfaction of the Bureau of Engineering. The Bureau of Engineering recommended that the dedication and improvement of Crocker Street be completed along Crocker Street and the alley north of the project site. In addition, the Mobility Element encourages "the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure" (Policy 5.4). The Project has been conditioned to comply with Building Code requirements for EV parking spaces.
9. **The Sewerage Facilities Element** of the General Plan will not be affected by the recommended action. While the sewer system might be able to accommodate the total flows for the proposed project, further detailed gauging and evaluation may be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity, then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. Ultimately, this sewage flow will be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the project.
10. **Health and Wellness Element and Air Quality Element.** Policy 5.1 and 5.7 of the Plan for a Healthy LA, the Health and Wellness Element, and Policy 4.2.3 of the Air Quality Element are policy initiatives related to the reduction of air pollution and greenhouse gases. As conditioned herein, the Project would be required to provide parking spaces which would be equipped for the immediate installation and use of EV Charging Stations, as well as for future use. The Project has also been conditioned to install solar panels to an operating photovoltaic system. The installation and operation of the solar panels would help to reduce the site's dependence on fossil fuels and carbon generating public utility electrical power. Taken together, the conditions would provide for the public welfare and public necessity by reducing the level of pollution or greenhouse gas emissions to the benefit of the neighborhood and the City. As conditioned, the Project would be consistent with the aforementioned policies, as well as Policy 5.1.2 of the Air Quality Element, by ensuring that future developments are compatible with alternative fuel vehicles and shift to non-polluting sources of energy. The solar and EV conditions are also good zoning practices because they provide a convenient service amenity to the occupants or visitors who use electric vehicles and utilize electricity on site for other functions. As such, the Project provides service amenities to improve habitability for future residents of the Project and to minimize impacts on neighboring properties.

### **Entitlement Findings**

11. **Vesting Zone Change and Height District Change Findings.**

- a. **Pursuant to Section 12.32 C of the Municipal Code, and based on these findings, the recommended action is deemed consistent with public necessity, convenience, general welfare and good zoning practice.**

Public Necessity, Convenience, and General Welfare

The Project Site is located within the Central City East district of the Central City Community Plan area. The district, as described by the Community Plan, consists of a mixture of residential, commercial, and light manufacturing uses. In addition to the mix of uses, the area is a center for social services, providing access to transitional housing and other supportive services for the homeless. The land use designation of the surrounding properties is Light Manufacturing and they are zoned for light manufacturing uses; however, a number of lots have remained developed with SRO buildings. The properties to the west and north have a Light Manufacturing Land Use designation. The land use designation one block north beyond Third Street and one block west beyond San Pedro Street are Regional Commercial and Community Commercial and High Medium Residential, with zoning designations of R5-4D-CDO, C2-2D and [Q]R5-2D, all which would permit residential uses by-right. The properties located directly across from the site, on the western side of Crocker Street, are developed with the Little Tokyo Lofts, a 145 unit live-work loft development with 28,000 square feet of commercial space on the first floor, approved in 2001, the Mutual Trading Company and the Fred Jordan Missions to the south and a boutique clothing company to the east. One block south and to the west is the Weingart Center, which was approved for a General Plan Amendment and Zone Change similar to that proposed on the subject property. The existing M2-2D Zone would prohibit the redevelopment of the Project Site with a new Project containing 175 residential dwelling units and 8,691 square feet of commercial floor area. In addition to the setting aside 173 dwelling units as Restricted Affordable Units for Extremely Low, Very-Low and Low Income households, the applicant proposes to provide on-site residential supportive services for the future tenants. As discussed in Finding No. 4, the Sustainable City pLAn issued by the Mayor establishes a goal to create 100,000 dwelling units by the year 2021. Additionally, the plan indicates a need to not only enable the production of additional housing, but to encourage the production of affordable housing. The Zone Change and Height District Change would permit the redevelopment of the site with a 100 percent, 175-unit affordable housing project.

The Project Site is located within a Transit Priority Area, as defined by Senate Bill (SB 743). The Metro Purple/Red Line station is at Pershing Square station, which is located 0.7 miles west of the Project Site, while the nearest Metro Gold Line Little Tokyo/Arts District station is located 0.45 miles northeast of the Project Site. The eastbound bus stop for Metro Bus Lines 18, 53, 62, and Metro Rapid Line 720 is located one and a half blocks south and west of the site at the southeast corner of San Pedro Street and 6<sup>th</sup> Street. The westbound bus stop is located one block south and west at the northeast corner of San Pedro Street and 5<sup>th</sup> Street. The bus lines would be able to provide connections to other public transit lines such as the Metro Red, Purple, and Gold lines, and a number of other bus lines located at Union Station. The Project would place additional housing within proximity to public transit, and employment centers, as such requiring zero (0) parking spaces for dwelling units that are set aside as Restricted Affordable units would reduce reliance on the use of individual vehicles and encourage the use of public transit, thereby supporting the policies and objectives of the General Plan as discussed in Findings No. 5 through 10.

As the Project proposes more than six (6) dwelling units, it is required to provide open space for the future residents. In lieu of providing a combination of common and private open space, the applicant has chosen to provide all of the required open space as common open space. Approximately 5,000 square feet of ground floor courtyards will be provided on the eastern and southern portions. The courtyard opening to Crocker Street will include a variety of landscaping and trees. A children's play area will be located near the southeast corner of the property on the ground floor. A community room and residence lounge will be located on the second floor, and a learning center is located on each floor on Floors 3 through 7. Although the dedicated area of indoor common open space would exceed the minimum 25 percent permitted by the LAMC, providing the additional area for shared common open space would support and encourage social activities for the future residents. While the Project provides a reduce amount of open space than stated in the LAMC, it would provide on-site outdoor and indoor open space which existing SRO buildings in the area lack. As proposed, the Project would be consistent with the public necessity, convenience, and general welfare of the surrounding area.

### Good Zoning Practice

As recommended, the Vesting Zone Change and Height District Change to [T][Q]C2-4D would permit the redevelopment of the Project Site with new affordable housing. As discussed in Finding No. 5, and above, the site is located within an area of the City which is developed with a mixture of residential, commercial, and light manufacturing uses. A number of properties in the area have been utilized for residential purposes since the early 1900s when they were developed with residential hotels for transient workers in the industrial field. The recommended Zone Change and Height District Change would enable the development of Restricted Affordable housing which would include on-site supportive services for future residents, consistent with Objective 9-1, Policy 9.1-1, and identified programs of the Community Plan, as referenced in Finding No. 5.

In conjunction with the redevelopment of the site, the proposed building would be required to comply with the current open space requirements of the LAMC. The Project would be required to provide 18,225 square feet of open space; however, the Applicant has requested two Developer Incentives to reduce the required open space by 60 percent, as well as to provide all of the open space as common open space. Existing SRO buildings have minimal landscaping or open space areas as they were constructed in the early 1900s. The Project would provide a total of 7,291 square feet of open space. The Project proposes to provide a 3,354 square foot outdoor courtyard that would be located primarily on the western side of the site as well as a children's play area on the ground floor. The ground floor courtyard along Crocker Street will be landscaped and planted with the trees. Although the Project proposes to reduce the amount of open space located on-site, the site is located 0.25 miles north of a public park, Gladys Park, located on 6<sup>th</sup> Street. The site is also located .2 miles northeast of San Julian Park, which is located at the southwest corner of San Julian Street and 5<sup>th</sup> Street. Facilities at the parks include landscaped play areas, seating areas, outdoor exercise equipment, and a half-court basketball court.

In addition to the requested two open space-related Developer Incentives, a third Developer Incentive allows for no parking spaces to be required for units set aside at the Extremely Low and Very Low Income levels as determined by the California Department of Housing and Community Development (HCD) or the U.S. Department of

Housing and Urban Development (HUD). The project qualifies for the by-right parking incentives offered by the Greater Downtown Housing Incentive Area. However, due to the project's Very Low Income set aside units being provided at both the HCD and HUD levels, the third Developer Incentive will allow for all units set aside at the Extremely Low or Very Low Income levels to have zero parking required. This is good zoning practice as it is consistent with the intent of the Greater Downtown Housing Incentive Area Ordinance to allow for reduced parking for units set aside at the most affordable levels. The granting of the incentive will ensure that parking for the Extremely Low and Very Low set aside units will benefit from the parking reduction at either the HCD or HUD rent levels.

As recommended, the Zone Change and Height District Change would permit the development of the site with a use that is compatible with the surrounding area and would support the goals, objectives, and policies of the General Plan, as discussed in Finding Nos. 5 through 10.

- b. **Pursuant to Section 12.32 G and Q of the Municipal Code "T" and "Q" Classification Findings.** The current action, as recommended, has been made contingent upon compliance with new "T" and "Q" conditions of approval imposed herein for the proposed project. As recommended, the Zone Change has been placed in permanent "T" and "Q" Classification in order to ensure consistency with the amendment to the land use designation from Light Manufacturing to Regional Commercial. The "T" Conditions are necessary to ensure the identified dedications, improvements, and actions are undertaken to meet the public's needs, convenience, and general welfare served by the actions required. These actions and improvements will provide the necessary infrastructure to serve the proposed community at this site. The "Q" Conditions that limits the scale and scope of future development on the site are also necessary to protect the best interests of and to assure a development more compatible with surrounding properties and the overall pattern of development in the community, to secure an appropriate development in harmony with the General Plan, and to prevent or mitigate the potential adverse environmental effects of the subject recommended action.
- c. **Pursuant to Section 12.32-G and Q of the Municipal Code "D" Limitation Findings.** **The Council shall find that any or all the limitations are necessary: (1) to protect the best interests of and assure a development more compatible with the surrounding property or neighborhood, and (2) to secure an appropriate development in harmony with the objectives of the General Plan, or (3) to prevent or mitigate potentially adverse environmental effects of the Height District establishment or change.**

The Project Site is located within an area which is developed with one- to six-story buildings and is limited to a maximum FAR of 3:1 unless the additional floor area is consistent with the rehabilitation provisions of the Redevelopment Plan. Height Districts 3 and 4 correspond to the Regional Commercial land use designation, as indicated in Footnote No. 3 of the Community Plan. The Footnote indicates that FARs within Height District 3 and 4 would be subject to a Development "D" Limitation, which would permit a maximum FAR of 6:1, unless a transfer of floor area is approved. The recommended change from Height District 2 to 4 would provide consistency with Footnote No. 3, which states either Height District 4 is a corresponding Height District for the Regional Commercial land use designation. The adoption of the "D" Limitation would limits the

maximum FAR to 4.99:1, which would permit floor area that is greater than what is currently permitted by-right on the surrounding properties. However, it would be less than the maximum FAR permitted by the existing "D" Limitation and Footnote. Additionally, the proposed 4.99:1 FAR would be consistent with the FAR that is permitted for the lots in the vicinity that are zoned for residential uses. The zoning designation one block north beyond Third Street and one block west beyond San Pedro Street are R5-4D-CDO, C2-2D and [Q]R5-2D, all which would permit residential uses by-right. Those properties are limited to FARs that range from 3:1 to 6:1, similar to the subject site. However, these lots would be able to apply the by-right FAR incentive of the Greater Downtown Incentive Area and receive a 35 percent increase in the permitted FAR for a 4.05:1 to 8:1 FAR. The proposed height of the building is consistent with the heights of the existing and proposed buildings in the vicinity.

The recommended FAR would be consistent with the anticipated development of Regional Centers as described within the Framework Element. The proposed setbacks, as well as building design, would make the buildings compatible with the surrounding area and would be consistent with the corresponding Height Districts of the recommended Regional Commercial Land Use Designation. As recommended, the "D" Limitation would limit the development of the site to a 4.99:1 FAR and a maximum height of 87 feet, ensuring that the future development would maintain compatibility with the surrounding area and any future development. As discussed in Finding Nos. 5 through 10, the "D" Limitation would secure an appropriate development in harmony with the objectives of the General Plan.

## 12. Site Plan Review Findings.

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

As discussed in Finding No. 1, the recommended Zone and Height District changes for the Project Site would be consistent with the recommended land use designation. As the Project Site is located within the Greater Downtown Housing Incentive Area, the Project would not be subject to the minimum lot area per dwelling unit calculations of the recommended C2 Zone. The density would be limited by the proposed 4.99:1 FAR and a minimum habitable size from the Building Code. As proposed, the Project would be a 100 percent affordable housing project which would provide two (2) manager units and 173 dwelling units set aside for Extremely Low, Very-Low and Low Income households. In conjunction with the requested Zone Change, the applicant has requested Developer Incentives to reduce the required open space and to reduce the amount of required parking. As discussed in Finding No. 5 through 10, the Project would meet the goals, objectives, and policies of the General Plan and the Central City Community Plan area. As such, the project is in substantial conformance with the General Plan and Community Plan. The project site is not located within a specific plan area.

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

The Project Site is located within the Central City Community Plan area, located mid-block to the south of 4th Street with approximately 175 feet of street frontage on Crocker Street and approximately 150 feet of street frontage on Towne Avenue. The surrounding properties are developed with a mixture of residential, commercial, and light manufacturing uses. Along Crocker Street, manufacturing uses include a wholesale distributor of food and clothing. Properties to the south are developed wholesale and religious and homeless services uses. The Little Tokyo Lofts, with 145 live-work units, is located to the west of the project site. The surrounding properties are developed primarily with one- to six-story buildings. As the Project Site is located within the Greater Downtown Housing Incentive area, the Project has been designed in accordance with the Downtown Design Guide and as described below, and would be compatible with the existing and future development on adjacent and neighboring properties. As identified in the Downtown Design Guide, the Project Site is located within the Central Industrial District.

#### Building Arrangement (height, bulk and setbacks)

As indicated in Figure 3-1 of the Downtown Design Guide, Towne Avenue and Crocker Street are not designated as Retail Streets. Along both frontages, the building would provide a zero-foot setback along Crocker Street, after the required dedication, and a varying setback along Towne Avenue, providing for articulation in the building façade. As proposed, the building would be consistent with Section 3.B of the Guide as it relates to building setbacks. The ground floor on each side of the building will utilize clerestory windows and glass storefronts and is designed to accommodate clear access to and from the uses in the building. Along Crocker Street would be commercial office space and access to the service provider office spaces. Access to the Food Court, community center and the residential lobby is through Towne Avenue. The building features a courtyard that opens to Crocker Street, with an articulated “V” shape to the building massing, which provides visual interest.

#### Off-Street Parking Facilities and Loading Areas

The Project proposes to provide 29 automobile parking spaces, which would be located within one subterranean level, along with short and long term bicycle parking. Although the Project does not propose parking spaces for a majority of the residential units, the Project has been conditioned to require that parking spaces are sold or rented separately from the residential dwelling units. A loading area is provided for the commercial uses off-street along the alley where it meets Crocker Street. As proposed, the Project would be consistent with the Section 5 of the Guide as it relates to the Parking and Access.

#### Lighting

The proposed plans do not indicate a lighting plan; however, Condition No. 9 of the Conditions of Approval would ensure that the installation of lights would not result in a substantial amount of light that would adversely affect the day or night time views in the project vicinity.

#### Landscaping

The Project proposes to provide 7,291 square feet of open space, which will be provided either as covered or uncovered outdoor open space or indoor community rooms or

learning centers. The Project has been conditioned to meet the planting standards of the Guide, as found in Section 9-H, unless otherwise prohibited by the Urban Forestry Division, Bureau of Public Works.

### Trash Collection

The Project proposes to provide a trash and recycling area within the building. The common area for the collection would be located within the parking area.

### Sustainability

The Project has been conditioned to meet the building code standards for the installation of wiring for current and future installation of electric vehicle charging stations, as well as the installation of an operational photovoltaic system (solar) that would offset the electrical demand of the EV chargers and other on-site electrical uses. The electric vehicle charging spaces and solar panels will improve habitability for residents and neighboring properties by reducing the level of greenhouse gas emissions and fuel consumption from the project site, in spite of increased parking capacity, through encouraging the use of low or zero emission vehicles.

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

The Project proposes to provide 175 units. Pursuant to LAMC Section 12.21 G, the Project would be required to provide 18,225 square feet of open space. In conjunction with the recommended zone change, it is recommended that the required open space be reduced. The Project proposes to provide 7,291 square feet of open space. Although the Project would provide less open space than required pursuant to LAMC Section 12.21 G, the proposed open space areas has been thoughtfully designed and it is anticipated that it would be sufficient to improve the habitability of its future residents. The Project proposes to provide a 3,354 square-foot ground floor courtyard which would be landscaped and accessible from Crocker Street. The balance of the open space will be provided through a children's play area and community rooms throughout the building. Landscaping would include a total of 44 24-inch box trees and 8 street trees, to be planted on-site and within the adjacent right-of-way. In addition to recreational amenities, the Project provides a dedicated space intended to provide residents with on-site social services related to mental, physical, social, and job training. As proposed, the project would provide recreational and service amenities which would improve habitability for its residents and minimize impacts on neighboring properties.

### Environmental Findings

- 13. Environmental Finding.** Pursuant to Senate Bill (SB) 375 and Public Resources Code (PRC) Section 21155.1, a project that qualifies as a Transit Priority Project and is declared by a legislative body to be a Sustainable Communities Project is statutorily exempt from the California Environmental Quality Act (CEQA). These SB 375 clearances are intended to meet the goals of the Sustainable Communities Strategy to encourage higher density, infill development located near transit.

In order to qualify as a Transit Priority Project, the project must be consistent with general land use policies of an adopted Sustainable Communities Strategy per PRC Section

21155(a) and meet the criteria in PRC Section 21155(b) related to minimum density, residential uses, and distance from a major transit stop or high-quality transit corridor. In order to qualify as a Sustainable Communities Project, the project must meet all environmental criteria in PRC Section 21155.1(a), all land use criteria in PRC Section 21155.1(b), and one public benefit criteria in PRC Section 21155.1(c). A public hearing must be held by City Council prior to declaring a project to be a Sustainable Communities Project and the City Council is required to find the necessary criteria are met in Subsections (a), (b) and (c) of PRC Section 21155.1. Unlike other CEQA clearances, the SCP Exemption must be approved by the City Council, even if the initial decisionmaker or appellate body is a lower decision-making body or officer.

The Department of City Planning has determined and will recommend to the City Council that the project is exempt from CEQA pursuant to PRC 21155.1 as a Transit Priority Project and Sustainable Communities Project. A public hearing will be held by the City Council on the SCP Exemption after completion of the appeal period, if no appeal is filed, or after the appeal is filed and the land use approval upheld (in whole or in part). The project approvals will not be final until the City Council has approved the SCP Exemption unless another CEQA clearance is approved.

14. **Flood Insurance.** The National Flood Insurance Program rate maps, which are a part of the Flood Hazard Management Specific Plan adopted by the City Council by Ordinance No. 172,081, have been reviewed and it has been determined that this project is located in Zone X, areas of minimal flooding.