Department of City Planning

City Hall, 200 N. Spring Street, Room 667, Los Angeles, CA 90012

June 24, 2021

TO: Mashael Majid, Planning Director, Council District 4

FROM: Craig Weber, Principal City Planner

RE: CD 4 Requests for the Hollywood Community Plan Update Process

This memo is in response to your May 18, 2021 request letter to prepare a feasibility analysis of sample lots within a portion of Hillhurst Avenue to optimize affordable housing opportunities, to clarify the actions taken at the March 18, 2021 City Planning Commission (CPC) meeting on the Hollywood Community Plan, and to provide information on expanding the definition of eligible historic resources in the Hollywood Community Plan Implementation Overlay (CPIO) District to include properties within the CPIO that have a California Historical Resource Status Code of 5S3.

Hillhurst Avenue (Los Feliz Boulevard and Franklin Avenue) Affordable Housing Feasibility Analysis

The following section includes calculations and feasibility analysis of sample lots specifically within the portion of Hillhurst Avenue north of the SNAP Specific Plan up to Los Feliz Boulevard (known as Subarea 13:1) to optimize affordable housing opportunities. Subarea 13:1 is one of the proposed areas of change under the Hollywood Community Plan Update. The analysis includes zoning metrics, such as floor area ratio (FAR), density, and height, and compares the proposed base zoning under the Draft Community Plan, the State Density Bonus, and the draft Community Plan Implementation Overlay (CPIO) Corridors subarea scenarios.

Figure 1

Background

On March 18, 2021, the City Planning Commission (CPC) recommended approval of the Hollywood Community Plan Update with a few recommended changes. One of the recommended changes was removing the proposed 36-foot height limit in Subarea 13:1 (**Figure 1**), with the suggestion that the City Council insert a maximum height that is more in line with and conducive to using the base and bonus system to achieve affordable housing on site. Under today's adopted zoning there is no height limit at this location.

In addition, the CPC recommended an expansion of the proposed affordable housing bonus incentives for the Corridor subareas in the Hollywood CPIO to increase the opportunity to build more affordable housing. Corridors 2 to 5 are currently proposed to have the same set of incentives, including 3:1 FAR, increased density (1 unit per 275 square feet of lot area), and a height bonus of 2 stories or 22 feet beyond the base height limitation. Prior to CPC, these incentives were only recommended for Corridor 2, and other incentives were proposed for Corridors 3 to 5.

The existing zoning in Subarea 13:1 is C4-1D. The FAR is 1:1, with no height limit specified, and a density of 1 dwelling unit per 400 square feet of lot area. Although there is not a height limit specified, 1:1 FAR applied today promotes lower scale buildings. The proposed zoning is [Q]C4-1D. The proposed FAR is 1.5:1, the Q condition is for a pending height limit as discussed above, and the density would be 1 dwelling unit per 400 square feet of lot area.

The Hillhurst Avenue corridor has a Neighborhood Commercial land use designation, and this is reflected by what has been built along both sides of the street. This corridor has mostly neighborhood-serving uses, including restaurants, retail, a large grocery store, a gas station, a few office buildings, a few multi-family residential buildings, and some surface parking. Many buildings are one to two stories tall and built close to the sidewalk. There is generally little development or redevelopment activity.

Sample Site Analysis

Four sample sites of various sizes along Hillhurst Avenue in Subarea 13:1 were selected for study purposes only. The property sizes range from approximately 10,000 square feet to approximately 105,000 square feet; the smaller lots are more representative of typical development sites along Hillhurst. The existing zoning for all four sites is C4-1D and none are eligible for the existing Transit Oriented Communities Guidelines (TOC) affordable housing incentives. Please note that selection of these sites for study does not indicate that there are plans to redevelop them.

Each site was analyzed using the following three scenarios that focus on density, FAR, and height incentives, as applicable. Additional incentives such as reduced parking spaces, setbacks, and lot coverage may be possible but are not described in the analysis. Each scenario assumed the use of three incentives.

Scenario 1 uses the proposed base zoning in the CPC recommended draft Hollywood Community Plan. The proposed base zoning [Q]C4-1D allows:

- Density: R4 (1 dwelling unit per 400 square feet of lot area)
- FAR: 1.5:1
- Height: Height limit pending

Scenario 2 uses State Density Bonus that allows up to 35% Density Bonus, based on the percentage of affordable housing units provided.

- Density: R4 plus 35% density bonus

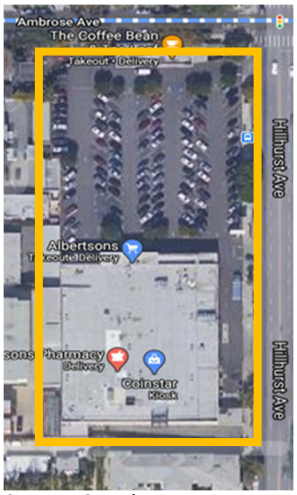
- FAR: 2:1 FAR (35% bonus)
- Height incentive: A maximum of 11 feet or 1 additional story

Scenario 3 uses the CPC recommended draft CPIO Corridor 2 incentives.

- Density: 1 dwelling unit per 275 square feet of lot area
- FAR: 3:1
- Height incentive: A maximum of 22 feet or 2 additional stories

As noted, other incentives such as reduced setbacks and parking could also be used to help optimize affordable housing but are not specifically discussed in the analysis. In addition to providing the three scenarios, examples of recent mixed-income development projects of similar size to the four sample sites are provided for informational purposes.

Site 1: 2035 Hillhurst Ave.



Source: Google

Source: Google

The existing use is an Albertsons grocery store with a surface parking lot; the lot size is approximately 2.4 acres (approximately 105,000 square feet).

Site 1 Scenarios

Scenarios	Proposed FAR / Square Footage	Allowed Units (Density)
Scenario 1: Proposed Zoning	1.5:1 / ~158,000	263*
Scenario 2: With Density Bonus	2.0:1 / ~213,000	356*

Scenario 3: With CPIO Corridor 2 incentives	3.0:1 / ~316,000	384*

Note: The actual lot size was used to calculate the above building square footage and allowed units.
* Scenario 1's allowed units are rounded down to 263 units per the Los Angeles Municipal Code (LAMC); Scenario 2 and 3's units are rounded up. Scenario 2 requires either 40 units for Very Low Income households or 79 units for Low Income households. Scenario 3 requires the provision of 39 units for Extremely Low Income households, 54 units for Very Low Income households, or 89 units for Lower Income households.
See Appendix 1 for how affordable housing units were calculated.

Site 1 Observations

Scenario 1 (Proposed Zoning) and Scenario 2 (with Density Bonus) have lower floor area ratios (FAR) than Scenario 3 (with CPIO Corridor 2 incentives). A higher FAR with more building square footage is more conducive to the development of residential units. In Scenario 1, a total of 263 units are allowed but the project is limited to 1.5:1 FAR or 158,000 square feet; no affordable housing units are required in Scenario 1. Under Scenario 2, a total of 356 units are allowed but the project is limited to 2:1 FAR or 213,000 square feet. Scenario 3 allows 3:1 FAR or 316,000 square feet for 384 units. The FAR allowed for Scenarios 1 and 2 would limit the number and/or size of the units, whereas the FAR for Scenario 3 would make it more feasible to develop the allowed mixed-income units.

Site 1 is a large site and a variety of building layout options are possible. With the square footage of 158,000 for Scenario 1, 213,000 for Scenario 2, 316,000 for Scenario 3, and after applying setback requirements to the 105,000 square foot lot, one option could be a basic boxy building that maximizes the square footage. A two-story building would be built in Scenario 1; a two-story to three-story building in Scenario 2, and a three-story plus building could be built in Scenario 3, but parking is also a consideration. It is likely that the parking would be provided above ground rather than underground due to cost. Parking could take up another story or two. With a height limit, however, parking is more likely to be subterranean.

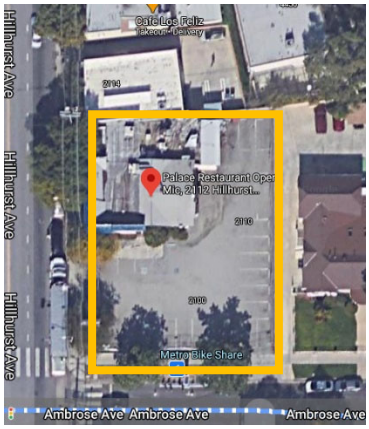
Therefore, a three-story to four-story building height for a mixed-income project in Scenario 2 and Scenario 3, inclusive of height incentives, could help achieve affordable housing on site. Other options include building smaller, taller buildings. In Scenario 3, a 3:1 FAR can typically produce mid-scale buildings of five to seven stories, and parking may be above grade, subterranean or a combination. Since the FAR and density bonuses have been recommended, the deciding factor is the height limit. As the square footage allowed increases, height also needs to be increased to build out the FAR. The base height limit should take into consideration Scenario 3's two-story height incentive and Scenario 2's one-story height incentive along with parking to optimize affordable housing.

Site 1 Comparable Mixed-Income Project, 7500 Sunset Boulevard

7500 Sunset Boulevard
Source: Urbanize LA

The zoning of the comparable mixed-use project is C4-1D with 1:1 FAR and an unspecified height limit. The lot size is two thirds of Site 1 but has the same Neighborhood Commercial land use designation. The project requested a FAR increase from 1:1 to 2.91:1 through the use of entitlements and a 35% Density Bonus. There are a total of 213 dwelling units including 11% or 20 Very Low Income (VLI) units. The project is 65 feet, five stories with some portions being three stories; a height incentive was not needed. There is a ground floor commercial and two to four levels of residential. The parking is contained in two levels of subterranean parking.

Site 2: 2112 Hillhurst Ave.



Source: Google

Source: Google

The existing use is a one-story restaurant with surface parking; the lot size is approximately 12,000 square feet.

Site 2 Scenarios

Scenarios	Proposed FAR / Square Footage	Allowed Units (Density)
Scenario 1: Proposed Zoning	1.5:1 / ~18,000	29*
Scenario 2: With Density Bonus	2.0:1 / ~24,000	41*
Scenario 3: With CPIO Corridor 2 Incentives	3.0:1 / ~36,000	44*

Note: The actual lot size was used to calculate the above building square footage and allowed units.
*Scenario 1's allowed units are rounded down to 29 units per the Los Angeles Municipal Code (LAMC); Scenario 2 and 3's units are rounded up. Scenario 2 requires either 5 units for Very Low Income households or 9 units for Low Income households. Scenario 3 requires 5 units for Extremely Low Income households, 7 units for Very Low Income households, or 11 units for Lower Income households.
See Appendix 1 for how affordable housing units were calculated.

Site 2 Observations

Scenario 1 (Proposed Zoning) and Scenario 2 (with Density Bonus) have lower floor area ratios (FAR) than Scenario 3 (with CPIO Corridor 2 incentives). A higher FAR with more building square footage is more conducive to the development of units. In Scenario 1, a total of 29 units are allowed but the project is limited to 1.5:1 FAR or 18,000 square feet; no affordable housing units are required in Scenario 1. Under Scenario 2, a total of 41 units are allowed but the project is limited to 2:1 FAR or 24,000 square feet. Scenario 3 allows 3:1 FAR or 36,000 square feet for 44 units. The FAR allowed for Scenarios 1 and 2 would limit the number and/or size of the units, whereas the FAR for Scenario 3 would make it more feasible to develop the mixed-income units.

Site 2 is a small site and building layout options are limited. With the square footage of 18,000 for Scenario 1, 24,000 for Scenario 2, 36,000 for Scenario 3, and after applying setback requirements to the 12,000 square foot lot, the most feasible option would be a boxy building that maximizes the square footage of the small site. A two-story building would be built in Scenario 1, a two-story to three-story building could be built in Scenario 2, and a three-story or four-story building could be built in Scenario 3, but parking is also a consideration. Parking could take up another story. Therefore, a three-story to four-story building height for a mixed-income project in Scenario 2 and Scenario 3 using height incentives could help achieve affordable housing on site. As previously discussed, the base height limit should consider the use of height incentives that would enable the production of affordable housing.

Site 2 Comparable Mixed-Income Project (TOC Tier 1 Incentives), 7673 Melrose Avenue

7673 Melrose Avenue
Source: Urbanize LA

The zoning of the comparable mixed-income project is C4-1XL and the FAR is 1.5:1. There is a 30-foot height limit and the lot size is similar to Site 2. The project requested a TOC Tier 1 incentive FAR increase to 2.2:1 and a one-story height increase from 30 feet to 41 feet. There are 24 dwelling units and two of them are Extremely Low Income (ELI) units. The project is three stories above ground including two stories of residential units and a commercial ground floor, with two levels of subterranean parking.

Site 2 Comparable Mixed-Income Project (TOC Tier 1 Incentives), 6535 W Melrose Avenue

6535 W Melrose Avenue
Source: Urbanize LA

The zoning of the comparable mixed-income project is [Q]C2-1VL-SN and the FAR is 1.5:1. There is a 45-foot height limit and the lot size is similar to Site 2. The project requested a TOC Tier 1 incentive FAR increase to 2.75:1 and an additional one-story height increase from 45-feet to 56-feet height. There are 33 dwelling units and three of them are Extremely Low Income (ELI) units. The project is a total of 4 stories above ground including commercial uses and parking on the ground level plus one level of subterranean parking.

Site 3: 2154 Hillhurst Avenue

Source: Google

Source: Google

The existing use is a gas station, and the lot size is approximately 10,000 square feet.

Site 3 Scenarios

Scenarios	Proposed FAR / Square Footage	Allowed Units (Density)
Scenario 1: Proposed Zoning	1.5:1 / ~15,000	25*
Scenario 2: With Density Bonus	2.0:1 / ~20,000	35*
Scenario 3: With CPIO Corridor 2 Incentives	3.0:1 / ~30,000	38*

Note: The actual lot size was used to calculate the above building square footage and allowed units.
* Scenario 1's allowed units are rounded down to 25 units per the Los Angeles Municipal Code (LAMC); Scenario 2 and 3's units are rounded up. Scenario 2 requires either 4 units for Very Low Income households or 8 units for Low Income households. Scenario 3 requires 4 units for Extremely Low Income households, 6 units for Very Low Income households, or 9 units for Lower Income households.
See Appendix 1 for how affordable housing units were calculated.

Site 3 Observations

Scenario 1 (Proposed Zoning) and Scenario 2 (with Density Bonus) have lower floor area ratios (FAR) than Scenario 3 (with CPIO Corridor 2 incentives). A higher FAR with more building square footage is more conducive to the development of units. In Scenario 1, a total of 25 units are allowed but the project is limited to 1.5:1 FAR or 15,000 square feet; no affordable housing units are required in Scenario 1. Under Scenario 2, a total of 35 units are allowed but the project is limited to 2:1 FAR or 20,000 square feet. Scenario 3 allows 3:1 FAR or 30,000 square feet for

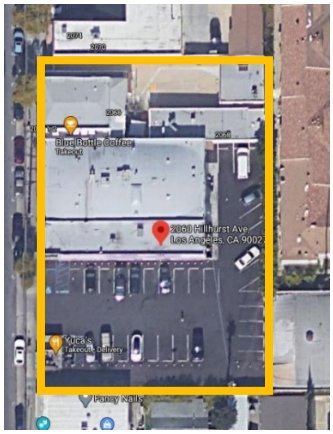
38 units. The FAR allowed for Scenarios 1 and 2 would limit the number and/or size of the units, whereas the FAR for Scenario 3 would make it more feasible to develop the mixed-income units.

Site 3 is also a small site and building layout options are limited. With the square footage of 15,000 for Scenario 1, 20,000 for Scenario 2, 30,000 for Scenario 3, and after applying setback requirements to the 10,000 square foot lot, the most feasible option would be a boxy building that maximizes the square footage of the small site. A two-story building would be built in Scenario 1, a two-story to three-story building could be built in Scenario 2, and a three-story or four-story building could be built in Scenario 3, but parking is also a consideration. Parking could take up another story. With a height limit, however, parking is more likely to be subterranean. Therefore, a three-story to four-story building height for a mixed-income project in Scenario 2 and Scenario 3 using height incentives could help achieve some affordable housing on site. As previously discussed, the base height limit should consider the use of height incentives that would enable the production of affordable housing.

Site 3 Comparable

Please see the Site 2 comparable mixed-income developments on pages 6 to 7.

Site 4: 2060 Hillhurst Avenue



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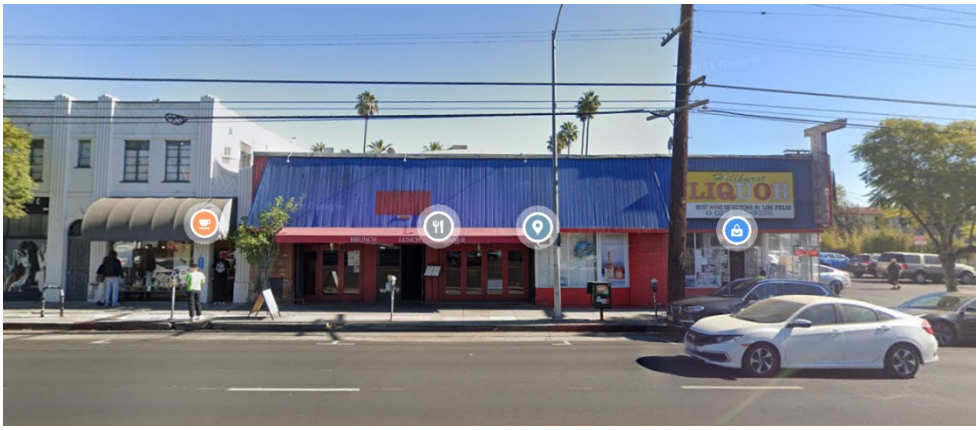

Source: Google

The existing use has a mix of a one-story commercial building with a liquor store and restaurant, and a two-story commercial building with a coffee shop, and surface parking. The lot size is approximately 27,000 square feet.

Site 4 Scenarios

Scenario	**Proposed FAR / Square Footage**	**Allowed Units (Density)**
Scenario 1: Proposed Zoning	1.5:1 / ~40,000	67*

Scenario 2: With Density Bonus	2.0:1 / ~54,000	92**
Scenario 3: With CPIO Corridor 2 Incentives	3.0:1 / ~81,000	99**

Note: The actual lot size was used to calculate the above building square footage and allowed units.
*Scenario 1's allowed units are rounded down to 67 units per the Los Angeles Municipal Code (LAMC); Scenario 2 and 3's units are rounded up. Scenario 2 requires either 11 units for Very Low Income households or 21 units for Low Income households. Scenario 3 requires 10 units for Extremely Low Income households, 14 units for Very Low Income households, or 23 units for Lower Income households.
See Appendix 1 for how affordable housing units were calculated.

Site 4 Observations

Scenario 1 (Proposed Zoning) and Scenario 2 (with Density Bonus) have lower floor area ratios (FAR) than Scenario 3 (with CPIO Corridor 2 incentives). A higher FAR with more building square footage is more conducive to the development of units. In Scenario 1, a total of 67 units are allowed but the project is limited to 1.5:1 FAR or 40,000 square feet; no affordable housing units are required in Scenario 1. Under Scenario 2, a total of 92 units are allowed but the project is limited to 2:1 FAR or 54,000 square feet. Scenario 3 allows 3:1 FAR or 81,000 square feet for 99 units. The FAR allowed for Scenarios 1 and 2 would limit the number and/or size of the units, whereas the FAR for Scenario 3 would make it more feasible to develop the mixed-income units.

Site 4 is a medium sized site. With the square footage of 40,000 for Scenario 1, 54,000 for Scenario 2, 81,000 for Scenario 3, and after applying setback requirements to the 27,000 square foot lot, one feasible option would be a basic boxy building that maximizes the square footage of the site. A two-story building would be built in Scenario 1, a three-story building in Scenario 2, and a four-story building could be built in Scenario 3, but parking is also a consideration. If there is no height limit it is likely that the parking would be provided above ground or a mix of ground level and subterranean due to cost. Parking could take up another or two-story. With a height limit, however, parking is more likely to be subterranean.

Therefore, a three-story to four-story building height for a mixed-income project in Scenario 2 and Scenario 3 using height incentives could help achieve affordable housing on site. In Scenario 3, a 3:1 FAR can produce mid-scale buildings, and parking may be above grade, subterranean or a combination. As the square footage allowed increases, height also needs to be increased to build out the FAR. The base height limit should consider Scenario 3's two-story height incentive and Scenario 2's one-story height incentive along with parking location to optimize affordable housing.

Site 4 Comparable Mixed-Income Project (TOC Tier 1 Incentives), 7901 W Sunset Blvd.

7901 W Sunset Blvd.
Source: Urbanize LA

The zoning of the comparable mixed-income project is C4-1D and the FAR is 1:1. The height limit is unspecified and the lot size is approximately three-fourths of Site 4. The project requested a TOC Tier 1 incentive FAR increase to 2.75:1. There are 62 dwelling units and five of them are Extremely Low Income (ELI) units. The project is a 97-foot tall building, with seven stories above ground. There are two levels of above grade parking and one level of underground parking.

Conclusion

Based on the feasibility analysis, all sample sites studied show a pattern of having limited building square footage that limits the number and/or size of the units in both Scenario 1 (Proposed Zoning) and Scenario 2 (with Density Bonus). The limited building square footage is the result of having limited floor area ratio (FAR) which regulates the total buildable square footage. Due to the limited FAR in both Scenario 1 and Scenario 2, the maximum number of units allowed to be built may not be feasible. All sample sites studied show that Scenario 3 (with CPIO Corridor 2 incentives) allows sufficient building square footage to develop the mixed-income units allowed. It is important to note that a higher FAR with more building square footage is more conducive to the development of units. The CPIO Corridor 2 affordable housing 3:1 FAR is an incentive that would attract mixed-income development as it would allow for a maximum number of residential units to be built.

In addition to FAR, height is another regulation that could limit the number of units. None of the sample sites currently have a height limit, but all existing buildings are usually one to two story buildings due to the limited 1:1 FAR. The new base height limit should take into consideration Scenario 3's two-story height incentive and Scenario 2's one-story height incentive along with parking location to optimize affordable housing. As the allowed square footage increases, height also needs to be increased to build out the FAR.

As noted in the various scenarios for each site, a three-story or four-story building height for mixed-income projects, inclusive of height incentives, would facilitate affordable housing on-site. Figure 2 below shows sample building heights for a hypothetical mixed-use project using the CPIO Corridor Incentives Scenario. In the first example where there is a height limit of 36 feet, a project includes ground floor commercial with two stories of market rate residential, and the project would need to include the minimum set percentage of affordable housing units to get up to 58 feet (with two additional stories). In the second example where there is a building

height limit of 45 feet, a project includes ground floor commercial with three stories of market rate residential, and an additional 2 stories or up to 67 feet would be allowed if the project provides a set percentage of affordable units. The variation in building floor height often depends on use, floor to floor heights for most building average between 12 to 14 feet for commercial and 11 feet for residential. A lower building height limit could facilitate a greater use of the affordable housing incentives to access additional height through the two-story bonus.

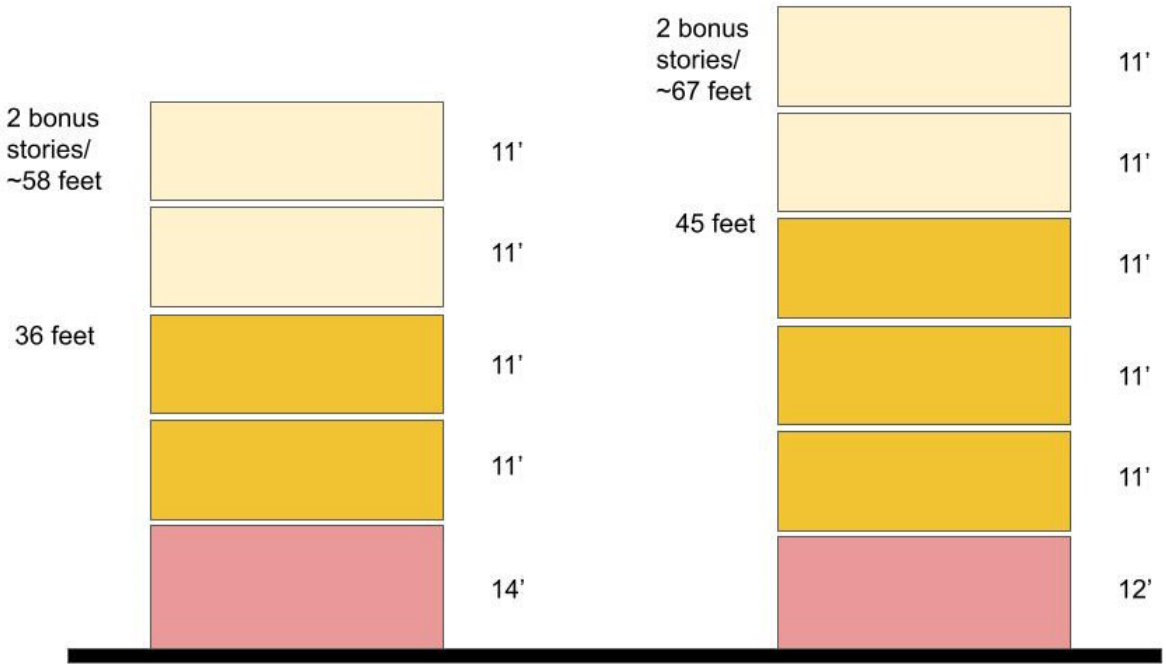

Figure 2

It is also important to note that building layout options are limited for small sites. With the limited square footage and after applying setback requirements to small lots, the most feasible option would be a boxy building that maximizes the square footage of the site. Parking should also be considered regarding height limits. With a base height limit, parking is more likely to be subterranean. An unintended consequence is that parking may be more likely to be built above ground than subterranean with a higher base height. On mid and larger project sites with increased bonus FAR, there is more room to build. Both heights and parking location could vary as parking could be provided above ground or subterranean or a combination of the two.

Additional Information

In the letter you also requested clarity on CPC's action taken at their March 18th meeting, and additional information on expanding the definition of eligible historic resources in the Hollywood CPIO District to include properties that have a California Historical Resource Status Code of 5S3. The full list of actions will be included in CPC's Letter of Determination to City Council, which has not yet been issued. In the interim, the following summary of actions is provided for additional clarity.

The CPC recommended approval of the listed recommended actions noted in the meeting agenda (https://planning.lacity.org/dcpapi/meetings/document/69197), with the following modifications:

- In the Hollywood CPIO District's Regional Center RC1B Subarea, modify the base FAR to 4:1 for areas near the Hollywood/Vine Metro station with proposed zone changes, with the option to bonus up to 6.75 FAR, and allow the Bonus Density for the Regional Center RC1 Subarea to be limited by FAR. Modify the CPIO Commercial Corridors incentives by consolidating Corridors 2 to 5 to Corridor 2.

- Remove the proposed height limit on Hillhurst Avenue with a suggestion that City Council insert a height limit that is more conducive to achieving affordable housing on site under a base and bonus system.

- Amendments to policies and the addition of new policies, including adding language to support pedestrian and streetscape improvements near parks, and policies to support street vending. A new implementation program was also added to consider a prequalification process for contractors that support high road wage and local hire training.

The Hollywood CPIO District recommended for approval by the CPC includes a clear development review process for designated and many eligible historic resources. Eligible Historic Resources in the CPIO are properties identified as eligible for listing as individual historic resources on the National Register of Historic Places, or on the California Register of Historic Resources, or as contributors within a historic district that is eligible for listing at the Local, State, or National level. Eligible Historic Resources in the CPIO do not include properties that have a California Historical Resources Status Code of 5S3, which are defined as properties that appear to be individually eligible for local listing or designation through survey evaluation. There are approximately 20 properties that have the 5S3 status code within the Hollywood CPIO. The City Council could include these properties to the CPIO's definition of Eligible Historic Resources through the Hollywood Community Plan adoption process, which includes adoption of the Hollywood CPIO District and other implementing zoning ordinances. This change could be made by amending the definition of Eligible Historic Resources in the CPIO to read:

> A building, structure, object, site, landscape, natural feature, or historic district identified as eligible for listing either individually, or as a contributor to an eligible historic district under a local, state or federal designation program, through SurveyLA (The Los Angeles Historic Resources Survey), or another historical resource survey completed by a person meeting the Secretary of the Interior's Professional Qualification Standards for Historic Preservation and accepted as complete by the Director, in consultation with the Office of Historic Resources (OHR), subsequent to the effective date of the CPIO. This term does not include a non-contributor to an eligible historic district.

For questions regarding this report, please contact Craig Weber at Craig.Weber@lacity.org.

Sincerely,

Craig Weber
Principal City Planner
Los Angeles City Planning

Appendix 1: Calculating Required Affordable Housing Units

State Density Bonus

The scenarios analyzed assumed use of three incentives, including FAR bonus and height increase. When three incentives are used, the required percentage of affordable housing to be provided on site is either 15% of base units allowed for Very Low Income (VLI) households or 30% of base units allowed for Low Income households. Please see the table below.

Sample Site	Base Units Allowed	VLI Units Required	LI Units Required
1	263	40	79
2	29	5	9
3	25	4	8
4	67	11	21

CPIO Corridor 2 Incentives

Under the CPIO affordable housing incentives, affordability percentages for Bonus Incentives must be met to utilize density and FAR increases. The required percentages of affordable housing to be provided on site are based on the total number of units allowed, including the bonus ones: 10% for Extremely Low Income (ELI) households, 14% for Very Low Income (VLI) households, or 23% for Lower Income (LI) households.

In addition, if other incentives are used, such as height increase and setback reductions, the required affordability percentages for Additional Incentives must also be met. The required number of units is determined by the base number of units allowed. The scenarios analyzed assumed use of three incentives. The required affordability percentages for three Additional Incentives: 11% for ELI, 15% for VLI, and 30% for LI. If the Bonus Incentives units exceed the Additional Incentives units required, no additional units are needed. Please see the table below.

Bonus Incentives

Sample Site	Total Units Allowed	ELI Units Required	VLI Units Required	LI Units Required
1	384	39	54	89
2	44	5	7	11
3	38	4	6	9
4	99	10	14	23

Additional Incentives

Sample Site	Base Units Allowed	ELI Units Required	VLI Units Required	LI Units Required
1	263	29	40	79
2	29	4	5	9
3	25	3	4	8
4	67	8	11	21