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Public Comments Not Uploaded Item 6, PLUM Hearing (12/7/21): NSO District Recommendations (CF No. 20-1265)

1 message

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Tue, Dec 7, 2021 at 12:29 PM

Reply-To: clerk.plumcommittee@lacity.org

To: clerk.plumcommittee@lacity.org, Fabiola Inzunza <fabiola.inzunza@lacity.org>, jeff.khau@lacity.org

Cc: gk@gideonlaw.net

Dear Hon. PLUM Committee, Ms. Inzunza, Mr. Khau:

On behalf of SEIU Local 721 and USC Forward Coalition ("Commenters"), please see attached comments. In short, Commenters support staff's recommendation for an expedited (12-month)

amendment to the South Los Angeles Community Plan Implementation Overlay. However, the explosion of co-living facilities that primarily serve as student housing has resulted in and continues to threaten the communities housing stock--particularly affordable housing. For this reason, Commenters urge PLUM (in addition to approve staff's recommendation) to take immediate action by:

1. Directing DCP staff, in consultation with other appropriate departments, to report back in 30 to 60 days with an ordinance for PLUM's consideration that:
 - a. amends the NSO District provisions consistent with Commenters' proposed amendments (see Comment Letter, "Exhibit A" attached thereto);
 - b. expands the current NSO District to San Pedro St. (east), W. 5th St. (south), Western Ave. ([west](#)), and [Venice Blvd./10 Freeway](#) (north) (Id., "Exhibit D" attached thereto).
2. Requesting PLUM direct staff to bring back in 12-months' time (along with the CPIO amendment) a proposal to establish a NSO District around the USC Health Science campus (Id.,).

We thank staff for its time and attention on this matter. Commenters look forward to working with the City to address this issue. If you have any issues retrieving the attached, please do not hesitate to contact me directly.

Very truly yours,

Jordan R. Sisson, Attorney

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2021.12.07_PLUM Comments_NS0 District Recommendations.pdf

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December 7, 2021

VIA EMAIL & WEB PORTAL: <https://cityclerk.lacity.org/publiccomment/>

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**RE: ITEM 6, PLUM HEARING SCHEDULED DECEMBER 7, 2021 (COUNCIL FILE NO. 20-1265);
RECOMMENDATIONS FOR UNIV/EXPO NSO SUPPLEMENTAL USE DISTRICT**

Dear Honorable PLUM Committee and Department of City Planning Staff:

On behalf of SEIU Local 721 (“**Local 721**”) and USC Forward Coalition (“**Coalition**”) (collectively “**Commenters**”), this Office submits the following comments¹ to the Planning Land Use Management Committee (“**PLUM**”) regarding the above-referenced item “**Staff Report**”² involving Department of City Planning (“**DCP**”) recommendations to address the loss of affordable housing and overconcentration of student housing near the North University Park-Exposition Park-West Adams Neighborhood Stabilization Overlay (“**NSO**”) Supplemental Use District (“**District**”), per motion adopted by City Council in January 2020 (“**Motion**”).³

In short, Commenters support DCP’s recommendation for an expedited (12-month) amendment to the South Los Angeles Community Plan Implementation Overlay (“**CPIO**”) subareas, which can address many of the parking, design, compatibility, and similar issues outlined by DCP. (Staff Report, pp. 2-4, 7.) However, the explosion of co-living facilities that primarily serve student housing has deeply impacted the community’s housing stock, particularly affordable units, and immediate relief is necessary for the NSO District community, as well as other areas similarly impacted by large university operations. This can be done with key amendments now to the current NSO District provisions, codified in the Los Angeles Municipal Code (“**LAMC**” or “**Code**”) §§ 13.12 & 12.24.W.52, which can serve as a unique tool that protects housing consistent with state housing laws. These amendments and other recommendations have been shared with DCP staff and are fully discussed below and in the attachments included herein.

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¹ Please note that page citations contained herein are to the page’s stated pagination (“**p. #**”) or to the page’s location in the referenced PDF document (“**PDF p. #**”).

² DCP (12/2/21) Staff Report RE: NSO Report Back, <https://lacity.primegov.com/meeting/attachment/401235.pdf?name=Report%20from%20Department%20of%20City%20Planning%20dated%202012-02-21.pdf>.

³ Motion, https://lacity.primegov.com/meeting/attachment/171500.pdf?name=Motion%2009_30_2020.

For the reasons discussed herein, Commenters respectfully urge that PLUM, in addition to approving staff's recommendation for an expedited CPIO amendment process, take immediate action by directing DCP staff, in consultation with other appropriate departments, to report back in 30 to 60 days with an ordinance for PLUM's consideration that: (1) amends the NSO District provisions consistent with Commenters' proposed amendment (attached hereto as "**Exhibit A**") and (2) expands the current NSO District to San Pedro St. (east), W. 5th St. (south), Western Ave. (west), and Venice Blvd./10 Freeway (north) (see "**Exhibit D**" attached hereto). Additionally, we request PLUM direct staff to bring back in 12-months' time (along with the CPIO amendment) a proposal to establish a NSO District around the University of Southern California ("**USC**") Health Science campus (see Exhibit D).

A. SUMMARY OF PROPOSED AMENDMENTS TO THE NSO DISTRICT PROVISIONS

Commenters urge PLUM to consider amending the NSO District provisions now as set forth in the redline version of LAMC §§ 13.12 and 12.21.W.52 (attached hereto as "**Exhibit A**"), which also includes additional comments and justifications in response to feedback received from DCP staff. Generally, the proposed amendment does the following:

1. Consistent with City Council's Motion, it adds several definitions (i.e., 'Co-Living Facility', 'Natural Occurring Affordable Housing', 'Student Housing') and lowers the threshold for a "Project" from five rooms to four rooms. (See proposed LAMC §§ 13.12.B.4.)
2. Closes loopholes on project piecemealing and requires greater transparency from permit applicants when applying for permits from the Department of Building & Safety ("**DBS**") by explicitly stating the resulting total number of bedrooms and bathrooms on the property. (Id., proposed subds., C & C.1.)
3. Restricts Co-Living Facilities to the R4 and less restrictive zone. (Id., proposed subd. C.3.)
4. Requires a robust replacement policy for any 'Affordable Housing Unit' or 'Naturally Occurring Affordable Housing' lost to a Project or Co-Living Facility. (Id., proposed subd. C.4.)
5. To the extent not otherwise required to do so, require rental properties to register with the City and the local university to report key data to the City so DCP has key data to monitor the NSO Districts housing stock in relation to student housing. (Id., proposed subd. D.)
6. Requires quarterly/semester report to the Area or City Planning Commission on the status of the NSO District's housing stock, affordable housing, student housing, progress in meeting applicable affordable housing goals, and alike. (Id., proposed subd. E.)
7. Adds additional Code-required finding that ensures Projects and Co-Living Facilities satisfy new requirements calling for a robust affordable housing replacement policy and do not impede the City's affordable housing obligations. (Id., proposed subd. C & § 12.21W.52(a)(4).)

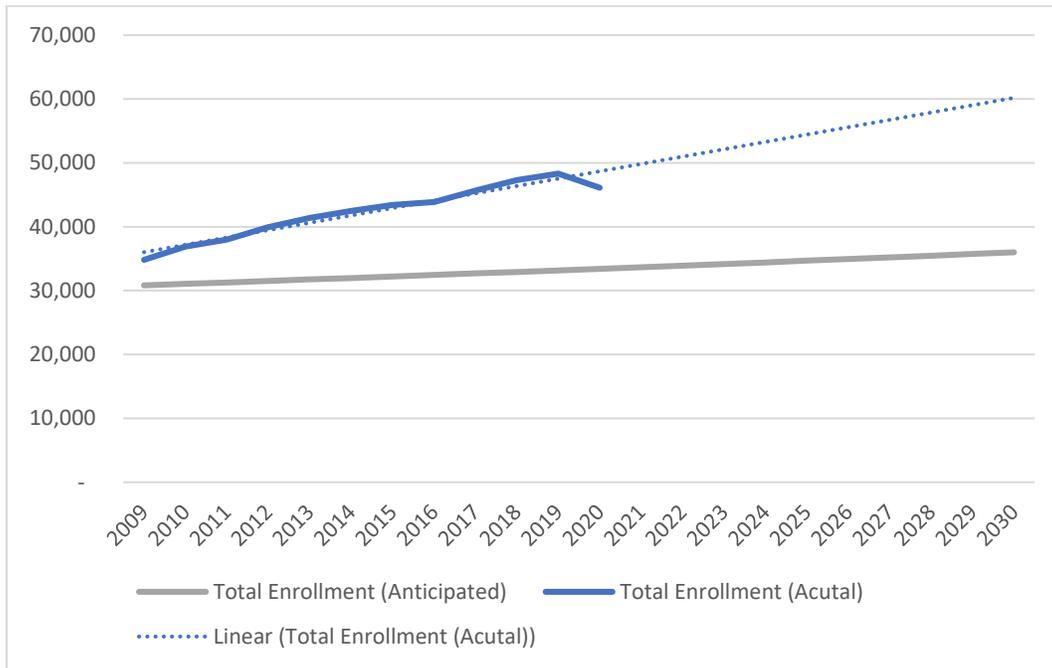
These NSO District changes are necessary now for the reasons discussed below.

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B. USC ENROLLMENT HAS EXPANDED BEYOND ANTICIPATED LEVELS, WHICH WARRANTS GREATER SCRUTINY BY THE CITY

When the USC Specific Plan was analyzed in 2010, USC anticipated a “small annual increase in student enrollment” from approximately 30,828 students (2009) to 36,000 students (2030).⁴ However, based on USC’s enrollment figures disclosed in its Common Data Set (“CDS”) and annual Financial Reports from academic years 2009-2010 through 2020-2021 (summarized in “**Exhibit B**” attached hereto), it would seem USC has grown well beyond these anticipated levels. The below chart reflects the *anticipated* growth in total enrollment (grey line) to the *actual* growth in total enrollment (blue line) and the trajectory of USC enrollment if the current rate of growth continues through 2030 (blue dashed line). Other observations about enrollment growth can be made when examining Exhibit B. First, during the 2009-2010 academic period, nearly 4,000 more total students were enrolled than anticipated. Second, while compound annual growth rate (“CAGR”) of undergraduate and graduate enrollment was *anticipated* to be 0.50 percent and 0.99 percent (respectively), *actual* growth of undergraduate and graduate enrollment has been 1.44 percent and 3.54 percent CAGR (respectively)—roughly three times more than anticipated. Third, at these actual growth rates, USC’s total enrollment will total nearly 60,152 by 2030—more than 24,000 students than anticipated. In sum, USC must be monitored more closely by the City to ensure responsible growth of enrollment accompanied by adequate student housing.

CHART: USC Enrollment Growth (Anticipated v. Actual)



⁴ DEIR, Appendix J, Employment, Housing and Population Impacts Assessment, PDF p. 29, https://planning.lacity.org/eir/USC/Feir/files/USC%20Appendix%20J%20-%20Emp-Hsg-Pop%20Tech%20Report%205_13_10.pdf; DEIR, Appendix C-2, Historic Resources Evaluation University Park Campus, PDF p. 118, 156 <https://planning.lacity.org/eir/USC/Feir/files/USC%20Appendix%20C-2%20Historic%20Resources%20Evaluation%20University%20Pa.pdf>.

C. CO-LIVING FACILITIES IN THE NSO DISTRICT SERVE AS STUDENT HOUSING AND HAVE SKIRTED EXISTING NSO DISTRICT THRESHOLDS VIA LOOPHOLES

Despite the tremendous growth of enrollment in recent years (as discussed above), USC has not grown its student housing capacity which has remained stagnate at 8,700 units since 2017,⁵ which is not much more than what was provided by USC in 2010 when the USC Specific Plan was reviewed.⁶ This has led to an increase of Co-Living Facilities serving primarily as student housing, such as those built and/or operated by Tripalink, Southland Development, and other management companies.⁷ Many of these facilities are listed as off-campus student housing options with some level of blessing by USC.⁸ Based on our research, including a review of more than forty of these Co-Living Facility listings (as summarized in “**Exhibit C**” attached hereto), several observations can be made by the vast majority of these facilities. First, these Co-Living Facilities are principally marketed to and primarily serving as student housing and leased on a single room basis—often including roughly one bathroom per room offered. As such, these facilities operate as “noninstitutional group quarters and not a housing unit” for purposes of meeting the City’s Regional Housing Needs Allocation (“**RHNA**”) obligations—as understood by the California Department of Housing and Community (“**HCD**”) and the U.S. Census (“**Census**”).⁹ Second, many of these facilities were listed in the City’s Draft Housing Element Appendix 4.1 (Inventory of Adequate Sites for Housing),¹⁰ which seems inconsistent with the expectation that properties would realistically be

⁵ See e.g., USC IPEDS Data Collection System-Institutional Characteristics 2020-21, PDF p. 8, https://oir.usc.edu/wp-content/uploads/2021/09/IPEDS_Institutional-Characteristics-Survey_2020-21.pdf; USC IPEDS Data Collection System-Institutional Characteristics 2017-18, PDF p. 8, <https://oir.usc.edu/wp-content/uploads/2019/04/IPEDS-Institutional-Characteristics-2017-18.pdf>.

⁶ DEIR-Appendix J, supra fn. 4, PDF p. 15 (noting “USC-owned and affiliated housing on- and off-campus currently accommodates 8,462 students”).

⁷ According to company websites (accessed December 2021) more than 245 properties and/or listings around USC campus. See e.g., (Tripalink listing 34 available properties), <https://tripalink.com/apartments/los-angeles/usc-off-campus-student-housing>; (Southland listing 19 completed projects and 4 available properties), <https://www.southlandstudenthousing.com/completed-projects> and <https://www.southlandstudenthousing.com/properties>; (Ashland Pacific Management listing 28 available properties), <https://www.ashlandatusc.com/available-properties>; (Mosaic Student Communities listing 36 rentals available near USC), <https://livewithmosaic.com/vacancies/page-1>; (Nova Student Housing listing 50 available vacancies), <https://www.novastudenthousing.com/vacancies>; (First Choice Housing listing 73 units), <https://firstchoicehousing.com/usc-off-campus-properties-for-rent>; (Stuho listing 5 properties), <https://stuho.com/spring-2022-availability>.

⁸ See USC Housing Website (including link to “off Campus Housing Listing Service (Off-Campus 101)”), <https://housing.usc.edu/index.php/interactive-map/>; see also Off-Campus 101, <https://nup.och101.com/>.

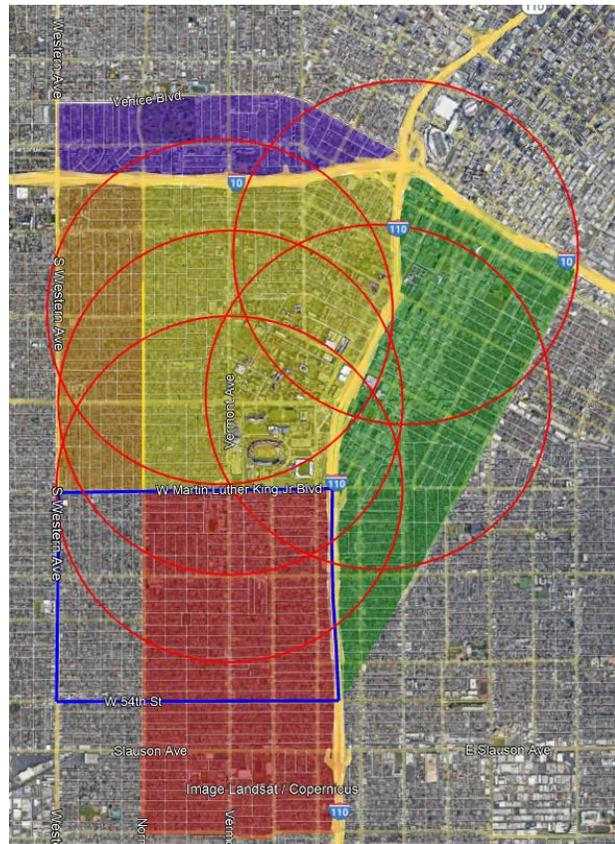
⁹ See e.g., HCD 2020 Inventory Guidebook, PDF p. 259, <http://www.pilpa.org/wp-content/uploads/2020/08/PILP-California-Housing-Element-Manual-August-2020-Appendices-B-S-2020-08-11.pdf>; Census 2020 Census and FERPA Q&A, PDF p. 2-3, https://www.aacrao.org/docs/default-source/statements-and-letters/2020-census-and-ferpa-questions-and-responses.pdf?sfvrsn=d55726f7_3; HCD Housing Element APR Instructions, PDF p. 5, <https://www.novato.org/Home/ShowDocument?id=30520>; Census Definitions & Explanations, PDF p. 5, <https://www.census.gov/housing/hvs/definitions.pdf>; Census Commentary on 2020 Census Group Quarters, <https://www.census.gov/newsroom/blogs/random-samplings/2021/03/2020-census-group-quarters.html>; HCD (7/1/21) Letter to City of David, PDF p. 5, <http://documents.cityofdavis.org/Media/Default/Documents/PDF/CDD/Advance-Planning/Housing%20Element%20Update%202021%20-%202029/HCD%20Findings%20Letter.pdf>.

¹⁰ See e.g., *Compare* Exhibit C (APNs: 5054026003, 5055010001, 5055016028, 5058029029, 5124006019, 5124012018, 5124012022) with Draft Appendix 4.1 (Lines 90517, 90970, 91069, 92279-80, 94776, 94556, 94559), <https://planning.lacity.org/odocument/965797b9-c036-4c06-9c0a-837bf822edb8>.

redeveloped for actual housing during the eight-year planning period.¹¹ This raises doubt about the integrity of the City’s newly adopted Housing Element. Third, many of these facilities have been the product of piecemeal development, such as tenant improvements to add bathroom facilities and/or demolition of single-family homes and replacement with multiple purported four-bedroom dwelling units on the property. This has resulted in the loss of long-term housing for the community, particularly the affordable housing units or naturally occurring affordable housing. Fourth, when considering the resulting capacity on these properties (after multiple permits), these facilities typically exceed the five-room thresholds under the current NSO District provisions—thus demonstrating exploitation of loopholes in the Code provisions. Fifth, contrary to suggestions otherwise (Staff Report, p. 3), tenants within a Co-Living Facility that rent by the room are not considered a ‘Family’ in a dwelling unit because they do not have “common access to ... and common use of all living ... areas within the dwelling unit.” (See LAMC § 12.03 [definitions for ‘Family’.] In sum, while Co-Living Facilities might serve as genuine housing in other parts of the City, they are not housing in the NSO District (as defined by HCD and the Census), has resulted in the loss of genuine community housing (particularly housing) by exploiting loopholes (e.g., serial permits) in the City’s Code.

D. USC’S INFLUENCE AROUND ITS UNIVERSITY PARK CAMPUS EXCEEDS CURRENT NSO DISTRICT BOUNDARIES, WHICH SHOULD BE EXPANDED IMMEDIATELY

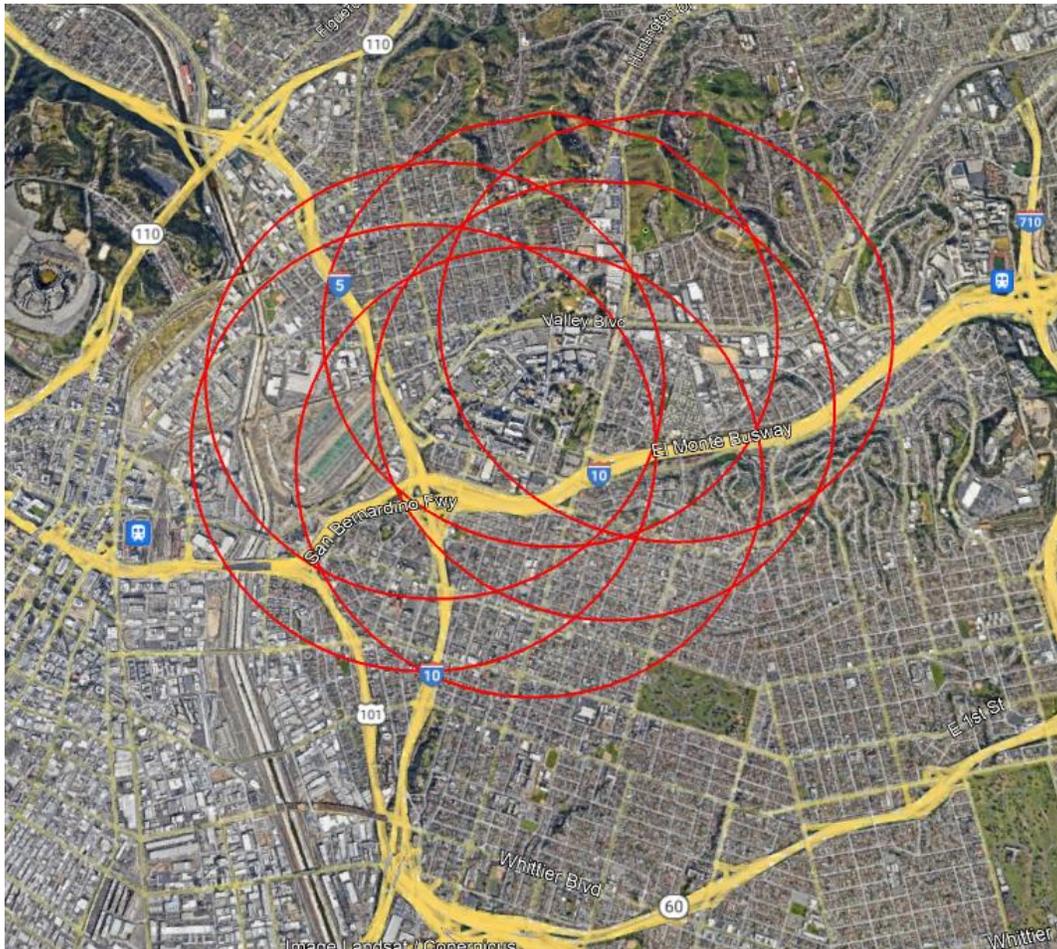
LAMC § 13.12.B allows the City to establish a NSO District up to one mile from the physical boundaries of a college or university. Currently, the NSO District is bounded by the 10 Freeway (north), Martin Luther King Boulevard (south), Normandie Avenue (west), and the 110 Freeway (east). However, USC’s sphere of influence and operations are not limited to the current NSO District. As shown in “**Exhibit D,**” both USC’s Department of Public Safety (“DPS”) patrol area and Lyft Ride Program extend north of the 10 Freeway and east of the 110 Freeway. So too, USC has numerous properties beyond the core University Park Campus. Consistent with the Code, which allows boundaries to be adjusted for various urban features (LAMC § 13.12.B.3), Commenters urge expansion of the current NSO District around the University Park Campus to include the area generally bound by Venice Blvd. and the 10 Freeway (north), San Pedro St. (east), W. 5th St. (south), and Western Ave. (west). (See figure right.)



¹¹ See Draft Housing Element, p. 153, <https://planning.lacity.org/odocument/aa9d124b-aa60-4cf4-b77c-8dac371a7742>.

E. ESTABLISHING A NSO DISTRICT AROUND USC'S HEALTH SCIENCE CAMPUS IS WARRANTED AND SHOULD BE CONSIDERED IN A YEAR'S TIME.

The loss of affordable housing and other impacts caused by large college/university operations are not limited to just USC's University Park campus. Communities similarly situated to other large university operations can be equally impacted. The NSO provisions serve as a unique tool to protect these communities, such as the communities surrounding USC's Health Science campus. Like the University Park campus, the Health Science campus includes DSP patrols, transportation programs, and USC properties in and around areas zoned commercial and/or low-medium residential. (See Exhibit D.) Commenters urge PLUM to consider establishing a NSO District around the Health Science campus to protect vulnerable affordable housing in the Lincoln Heights and Boyle Heights communities that could face the same fate as those units lost to demolition and/or conversion in the South Los Angeles area.¹² Commenters request PLUM ask DCP staff to bring back in 12-months (along with its proposed CPIO Amendment) an ordinance that would establish a NSO District within 1-mile of USC properties at the Health Science campus. (See figure below.)



¹² See Daily Trojan (4/15/20) USC should do more to reduce the effects of gentrification, <https://dailytrojan.com/2020/04/15/usc-should-do-more-to-reduce-the-effects-of-gentrification/>.

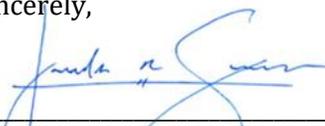
F. THE PROPOSED AMENDMENTS ARE CONSISTENT WITH SB 330, HOUSING ELEMENT, AND FAIR HOUSING LAWS.

Briefly, Commenters want to address several concerns raised by DCP staff. First, the *proposed amendment is consistent with SB 330*. The Co-Living Facility location requirement is merely applying existing zoning regulations applicable to similar uses (e.g., dormitories, fraternities, sororities) to this newly defined use. (See Gov. Code § 66300(b)(1)(A); see also Exhibit A [comments for proposed LAMC § 13.12.C.3].) So too, SB 330 allows local governments to place greater protections of affordable housing. (See Gov. Code § 66300, subds., (d)(2) – (d)(4).) Second, the amendment does not reduce housing capacity or bar genuine co-living arrangements. As discussed above and Exhibit A, student housing masquerading as Co-Living Facilities is not considered housing per HCD/Census definitions. Moreover, the proposed amendment merely provides a rebuttable presumption applicable only within the NSO District—not applicable to the rest of the City. This is appropriate given the highly unique context of Co-Living Facilities near the USC campus. Third, neither California’s Fair Housing Laws nor Article 5.6 of the Code are implicated by the Amendment. The proposed Co-Living Facility location requirement is merely the application of use regulations akin to similar uses (i.e., dormitories, sororities, fraternities).¹³ So too, the affordable housing unit replacement requirement serves to preserve existing affordable housing and meet the City’s affordable housing obligations under the RHNA, which is authorized under SB 330. Additionally, LAMC § 45.61.D explicitly exempts housing accommodations primarily serving as student housing (like Co-Living Facilities in the NSO District).

G. CONCLUSION

We thank DCP staff for its time and effort. We support the CPIO amendment process but time is of the essence and the community cannot wait yet another 12 months for relief to protect against the loss of both affordable housing and naturally occurring affordable housing. For the reasons discussed here and elsewhere in the record, Commenters respectfully urge PLUM to consider an appropriate NSO District amendment in 30 to 60 days as set forth in this letter and exhibits, and act to create a NSO at the USC Health Science Campus.

Sincerely,



Jordan R. Sisson, Esq.
Attorney for Local 721

ATTACHMENTS:

- Exhibit A: Proposed NSO District Amendments
- Exhibit B: USC Enrollment Table (Anticipated v. Actual)
- Exhibit C: Co-Living Facilities Surveyed
- Exhibit D: Proposed NSO Expansion Areas

¹³ Certainly, DCP would not suggest zoning restrictions on these uses are somehow a violation of fair housing laws.

EXHIBIT A

EXHIBIT A: PROPOSED NSO DISTRICT AMENDMENT

SEC. 13.12. "NSO" NEIGHBORHOOD STABILIZATION OVERLAY DISTRICT.

A. **Purpose.** This section sets forth procedures, guidelines and standards for the establishment of "NSO" Neighborhood Stabilization Overlay Districts in areas of the City that are proximate to colleges and universities. The purpose of the NSO District is to protect and preserve the existing low density housing stock; to maintain and enhance the quality of life of area residents; to promote well-planned student housing; to establish regulations that address the negative impacts multi-habitable room projects cause; to address inadequate parking; to prevent irreversible damage associated with oversized multi-habitable room projects; [preserve and promote affordable housing that serves the community needs consistent with state law](#); and to help stabilize neighborhoods. The purpose of the NSO District is also to ensure that future Projects, [Co-Living Facilities, and Student Housing \(as defined herein this Section\)](#), are designed to be compatible with buildings that are adjacent or across the street.

B. Establishment of the District.

1. **Requirements.** Each application for the establishment of a "NSO" Neighborhood Stabilization Overlay District shall follow the procedures set forth in Section 12.32 S. of this Code, except that each "NSO" Neighborhood Stabilization Overlay District shall include only properties in the R2, RD, R3, RAS, R4, R5, CR, C1, C1.5, C2, C4, C5 or CM zones.
2. **Radius.** The radius of a "NSO" Neighborhood Stabilization Overlay District shall be at least one-quarter mile and no more than one mile from the physical boundaries of a college or university. The District shall not generally be less than one-quarter mile radius wide.
3. **Boundaries.** The boundaries shall be along street frontages and shall not split parcels. The precise boundary of a District may be adjusted for urban features such as topography, freeways or streets / highways. Precise boundaries are required at the time of application for or initiation of an individual District. The "NSO" Neighborhood Stabilization Overlay District shall include contiguous parcels of residentially and commercially zoned parcels, which may only be separated by public streets, ways or alleys or other physical features, or as set forth in the rules approved by the Director of Planning. A "NSO" Neighborhood Stabilization Overlay District may encompass an area that is designated, in whole or in part, as a Historic Preservation Overlay Zone and/or Specific Plan area.
4. **Definitions.** Notwithstanding any other provision of this article to the contrary, the following definitions shall apply to this section:

Affordable Housing Units. Dwelling units or guest rooms for which rental payments do not exceed the limits established by the Los Angeles Housing Department for persons and families whose income does not exceed 30% - 120% of Area Median Income (AMI), adjusted for family size by the United States Department of Housing and Urban Development in accordance with adjustment factors established and amended from time to time pursuant to Section 8 of the United States Housing Act of 1937. The income limits are defined as lower, low, moderate, very low, or extremely low income households in Sections 50079.5,

Commented [JS1]: Providing definitions is consistent with City Council's Motion. (See CF No. 20-1265 [number 1.a], https://clkrep.lacity.org/online/docs/2020/20-1265_rpt_plum_12-3-20.pdf.)

So too, it is not uncommon for the LAMC to provide definitions specific to certain sections. (See e.g., LAMC §§ 11.01, 12.40.D, 12.70, 12.95.2.G, 13.09.B.3, 45.66, 49.98.1, 91.9503, 106.03.)

EXHIBIT A: PROPOSED NSO DISTRICT AMENDMENT

50093, 50105 and 50106 of the California Health and Safety Code. (Amended by Ord. No. 187,122, Eff. 8/8/21.)

Area Median Income (AMI). The median income in Los Angeles County as determined annually by the California Department of Housing and Community Development (HCD) or any successor agency, adjusted for household size.

Co-Living Facility and Co-Living Facility Operator. A portion of a building containing three or more separate living quarters, a shared kitchen, and other communal areas. Each separate living quarter must include a bedroom but may or may not have a private bathroom. Each separate living quarter cannot exceed a total occupancy of two people. Cooking facilities, specifically a stove or oven, shall not be provided within a private living space. Typically, separate living quarters within a Co-Living Facility are leased on an individual basis (e.g., by bed or room) and operated under common ownership and/or management (“Operator”). For a Co-Living Facility, each separate living quarter on the property under Operator’s control shall be treated as a dwelling unit or guest room for purposes of calculating density requirements and alike.

Commented [JS2]: Modified from City of Alexandria (VA) proposed Municipal Code § 2-136. (See <https://www.alexandriava.gov/planning/info/default.aspx?id=120969>.) Other jurisdictions have taken different approaches, such as City of San Jose’s proposed Municipal Code § 20.200.197. (See <https://sanjose.legistar.com/LegislationDetail.aspx?ID=3859215&GUID=8F323B37-6102-40BC-94E6-6FD2079FD8D9&Options=&Search=>)

Within a NSO District, there is a rebuttable presumption that an existing or proposed dwelling unit with three habitable rooms and at least two toilets is part of a Co-Living Facility. Subject to a public noticing and opportunity to comment, said presumption may be rebutted or confirmed by sufficient relevant evidence, including but not limited to:

Commented [JS3]: The use of “rebuttable presumption” is not unique to the Code. (See e.g., LAMC §§ 21.1.3(g), 45.04(b)(11), 49.7 subds. 2.A.1 & 5.B & .39.F.2, 151.02 [definition for “Rental Units”], 200.31.H.)

1. Rent rolls showing rooms not rented on an individual basis.
2. Habitable rooms with dedicated/private bathroom facilities.
3. Exterior signage/branding and other marketing materials, and
4. Operator’s affiliation with other Co-Living Facilities.

Commented [JS4]: The following criteria is based on review of numerous co-living facilities in the NSO District and ULI presentation materials on the topic held in September 2021. (See https://www.dropbox.com/s/uhpws5b8hzie973/ULILA_COLIVING_DECK_9_23_21%20%281%29.pdf?dl=0.)

Naturally Occurring Affordable Housing. Existing residential units that are currently affordable for at least modest-income homeowners and renters due to age or other factors. These units shall be protected to the fullest extent feasible as vital to the community’s existing housing stock. Within a NSO District, there is a rebuttable presumption that the following units are naturally occurring affordable housing:

1. Affordable Housing Units as defined in this section;
2. Units subject to the City’s Rent Stabilization Ordinance;
3. Units subject to the California Tenant Protection Act of 2019 (AB 1482);
4. Units subject to a covenant, ordinance, or law restricting rent to levels affordable to lower income households;

EXHIBIT A: PROPOSED NSO DISTRICT AMENDMENT

- 5. Units that were vacated or tenant given a notice subject to an Ellis Act termination notice within the last five years;
- 6. Properties 40 years or older;
- 7. Units occupied within the last five years by persons and/or families whose income does not exceed 150 percent AMI. If the income category of the household in occupancy is not known, it shall be rebuttably presumed that lower income renter households occupied these units.

Project. The construction, erection, addition to, enlargement of or reconfiguration of any one-family dwelling or multiple-family dwelling units or portions of dwelling units in the R2, RD, R3, RAS, R4, R5, CR, C1, C1.5, C2, C4, C5 or CM zones that create at least one dwelling unit with ~~five~~four or more habitable rooms.

A project shall not include any of the following uses:

- 1. Dormitories on an official college or university campus; or
- 2. Any qualifying Affordable Housing Units.

Student Housing. A portion of a building principally serving as housing college/university students that typically lease private living spaces or bedrooms rather than entire dwelling units. Student Housing includes residence halls and other buildings, including apartment-style student housing, designed primarily to house college and university students in group living arrangements either on or off campus. These facilities are owned, leased, or managed by a college, university, or seminary or can be owned, leased, or managed by a private company or agency. Within a NSO District, there is a rebuttable presumption that Co-Living Facilities and Projects, as defined in this section, serves as Student Housing unless rebutted by sufficient relevant evidence.

- 5. **Findings.** In order to establish a “NSO” Neighborhood Stabilization Overlay District, the City Council shall find that Neighborhood Stabilization Overlay regulations will protect and enhance the character of the District by regulating building bulk caused by Co-Living Facilities and buildings with ~~five~~four or more habitable rooms per unit; ~~and~~ that the District is negatively impacted by excessive on-street parking resulting from residential units designed for student housing, which do not provide adequate off-street parking; and that the District’s existing and future housing stock, particularly affordable housing, is vulnerable.
- C. **Development Regulations.** All property within a District shall be subject to the following conditions and shall apply to individual projects for which permits are sought and also to the cumulative sum of related or successive permits which are part of a larger project, such as piecemeal additions to a building, or multiple buildings on a lot, or development on adjacent lots sharing common ownership, management, or commercial enterprise:
 - 1. **Building Permit.** The Department of Building and Safety shall not issue a building permit for a Project or Co-Living Facility within a “NSO” Neighborhood Stabilization Overlay District unless a conditional use approval has been granted pursuant to Section

Commented [JS5]: 120% AMI only captures RHNA levels. (See <https://www.cityofmonrovia.org/home/showpublisheddocument/25799/637588564196570000>.) This does not really address NOAH (e.g., above moderate-income housing, missing middle, work force housing, etc.). 150% AMI has precedent such as: (i) HCID (<https://housing.lacity.org/wp-content/uploads/2021/07/LU-2021-Income-and-Rent-Limits-Schedule-1.pdf>); (ii) DCP (PDF p. 5, <https://planning.lacity.org/odocument/9b1f5704-c631-459c-b6b8-19bd24ae2bd3/CPC-2020-4714.pdf> and PDF p. 19, https://planning.lacity.org/eir/NBC_UnivPlan/DEIR/files/IV.N.2%20Housing.pdf); and (iii) the Code (LAMC 12.22.A.29(a) [Greater Downtown Housing Incentive Area]).

Commented [JS6]: Reducing threshold is consistent with Council’s Motion. (See Council File No. 20-1265 [number 1.b], https://clkrep.lacity.org/online/docs/2020/20-1265_rpt_plum_12-3-20.pdf].)

Commented [JS7]: This is consistent with Cal. Housing & Community Development (“HCD”) and U.S. Census Bureau (“Census”) definitions. (See e.g., HCD 2020 Inventory Guidebook, PDF p. 259, <http://www.pilpa.org/wp-content/uploads/2020/08/PILP-California-Housing-Element-Manual-August-2020-Appendices-B-S-2020-08-11.pdf>; Census 2020 Census and FERPA Q&A, PDF p. 2-3, https://www.aacrao.org/docs/default-source/statements-and-letters/2020-census-and-ferpa-questions-and-responses.pdf?sfvrsn=d55726f7_3; HCD Housing Element APR Instructions, PDF p. 5, <https://www.novato.org/Home/ShowDocument?id=30520>; Census Definitions & Explanations, PDF p. 5, <https://www.census.gov/housing/hvs/definitions.pdf>; Census Commentary on 2020 Census Group Quarters, <https://www.census.gov/newsroom/blogs/random-samplings/2021/03/2020-census-group-quarters.html>.)

Commented [JS8]: This would address serial applications and tenant improvements and analogous to Site Plan Review. (See LAMC § 16.05.C.1.)

EXHIBIT A: PROPOSED NSO DISTRICT AMENDMENT

12.24 W.52. of this Code. When applying for permits, the applicant shall clearly specify whether the permit is in furtherance of a Project or Co-Living Facility and identify the number of habitable rooms and bathroom facilities that are existing, proposed, and total resulting after work is completed that will be located on the property in question. A bi-weekly report of building/demolition permit applications within the NSO District shall be regularly provided to relevant neighborhood councils and other parties upon written request.

2. Parking Requirements. Any Project shall, in addition to complying with the parking requirements of Section 12.21 A.4.(a) of this Code, also provide one additional parking space for each habitable room at or above five habitable rooms.

3. Co-Living Facility Location Requirements: In the NSO District, Co-Living Facilities are allowed only in the R4, R5, CR, C1, C1.5, C2, C4, C5, or CM zones and subject to nonconforming provisions of Section 12.23 of this Code.

4. Protection of Affordable Housing: Any Project or Co-Living Facility resulting in the loss of an Affordable Housing Units or Naturally Occurring Affordable Housing shall be subject to a replacement policy including but not limited to the following policies:

a. Require replacement units to contain at least the same square footage in addition to the same number of bedrooms and bathrooms; and/or require additional replacement units to achieve equivalency of lost units (e.g., two-for-one replacement units);

b. Require replacement units to either be rent-controlled, at the same rent as the demolished unit, or available at an affordability level that corresponds to the median income level in the neighborhood, recorded as a restrictive covenant for fifty-five years. Let the displaced tenant choose between these two options for their unit, if they are able to return;

c. Require the developer to pay the rent differential for a displaced tenant for a replacement unit in the tenant's own neighborhood until the replacement unit is made available;

d. Require the replacement unit to be held open for sufficient time for the displaced tenant to return;

e. Provide that all tenants of replacement units shall have the same rights and privileges of other tenants in the same building or complex with respect to common space amenities, entry into the building, and building services.

D. Registration Requirements: Within the NSO District, the following registration and reporting requirements apply:

1. Landlord Registry: To the extent not otherwise required to do so, all Projects and Co-Living Facilities shall register with the City, identifying how many separate living quarters provided by the Operator on the property in question and whether they principal serve as housing for college/university students. This may be done annually or on a quarterly/semesterly basis (depending on the local college or university system).

Commented [JS9]: This should be readily available by the Department of Building & Safety ("DBS"). For example, the Lake Balboa Neighborhood Council Land Use Committee would often receive summary reports of demolition permits in the area. Additionally, by making such reports available the community can serve as additional eyes on the ground to alert DCP and DBS of issues needing enforcement.

Commented [JS10]: While Apartment Houses, Boarding Houses, and Rooming Houses are permitted in the R3 (LAMC § 12.10.A.4-5), these structures are used almost exclusively as student housing within the NSO District and, thus, most akin to a Dormitory, Fraternity, or Sorority—which is allowed by right in the R4 (LAMC § 12.11.A.5). (See also Zoning Guidelines, PDF p. 34, 154, 157, 171, <https://planning.lacity.org/odocument/647665b9-6246-4eaf-a70c-f06285ff28c4/UseListMemo.pdf>; see also LAMC § 12.24.W.21.) This contextual treatment of co-living facilities is consistent with the contextual treatment of "ghost kitchens" in ZA Memo No. 137 dated November 19, 2021 (<https://www.dropbox.com/s/0kke0p2xt9qx1h5/ZA%20Memo.137-%20Ghost%20Kitchens.pdf?dl=0>) prepared in response to related motion (Council File No. 21-0665, https://clkrep.lacity.org/online/docs/2021/21-0665_mot_06-15-21.pdf). So too, this is consistent with the intent of SB 330, because this merely clarifies/applies existing zoning regulation in effect on Jan. 1, 2018 for similar uses to the newly defined Co-Living Facility use. (See Gov. Code § 66300(b)(1)(A).)

Commented [JS11]: While SB 330 provides a floor of what a replacement unit requirement would be for affordable housing destroyed, it does provides local municipalities discretion to provide greater protections (see Gov. Code § 66300, subs (d)(2)-(d)(4)).

Commented [JS12]: HCID might be able to identify existing registries/sources for identification of properties being rented.

EXHIBIT A: PROPOSED NSO DISTRICT AMENDMENT

2. **Education Institution Reporting:** To the extent not otherwise required to do so, the college or education institution shall provide the City Planning Department relevant information about its student housing, including but not limited to: (i) enrollment of all undergraduate, graduate, and other special program students; (ii) inventory of all student housing provided on-campus and off-campus owned, leased, managed by the college or university; (iii) locations of all students living off-campus whether in student housing owned, leased, or managed by the college/university, by a private company, or by other entity (e.g., home with parents); (iv) census data provided by the college or university; and (v) other relevant data concerning the college/university operations within and around the NSO District boundaries (e.g., buildings owned, leased, or managed; operations and or services provided; campus police boundaries; etc.).

E. **Monitoring & Reporting of Community Housing Stock.** The City shall regularly monitor the status of community housing stock within the NSO District, including the loss of long-term housing, Affordable Housing Units, and Naturally Occurring Affordable Housing due to Student Housing; as well as the appropriateness of existing NSO boundaries. To this end, on a quarter or semester system (depending on the local college or university system), the Department of City Planning shall provide the Area Planning Commission or City Planning Commission a report summarizing its findings and recommendations after reviewing relevant information (e.g., landlord registries, institutional reporting, demolition permits, RHNA data, building/demolition permits, etc.). At a minimum, the report shall include a summary of the following:

1. **Information about the college or university** such as: total student enrollment at the college or university; total student housing provided on-campus and off-campus owned, leased, or managed by the college or university; total and percentage of students living in student housing owned/leased/managed by either the college/university or other entities (e.g., Co-Living Facility Operators, private entities, home with parents, etc.); total and percentage of students living within the NSO District and around the periphery (e.g., within one, five, or ten-plus miles of the existing NSO District boundaries); and the sphere of influence of the college and university.

2. **Information about the NSO Districts housing stock** such as: number, increase, or decrease in existing housing stock, Affordable Housing Units, and Naturally Occurring Affordable Housing; number and percentage of housing stock, Affordable Housing Units, and Naturally Occurring Affordable Housing used as Student Housing; amount of housing stock lost due to demolitions and or conversions into Student Housing; number, increase, or decrease in Co-Living Facilities and Student Housing.

3. **Information about the NSO Districts affordable housing obligations,** such as: status or progress of the area's RHNA obligation; development occurring on properties identified as available to meet the area's RHNA obligation under the applicable Housing Element and whether it was developed as housing, Student Housing, or Co-Living Facilities; the number, increase, or decrease of potential properties available to satisfy RHNA obligations; status of other affordable housing obligations, such as those found in applicable redevelopment plans.

Commented [JS13]: Consistent with Census definition for Group Quarters Type 501. (See PDF p. 2, https://www.aacrao.org/docs/default-source/statements-and-letters/2020-census-and-ferpa-questions-and-responses.pdf?sfvrsn=d55726f7_3.)

Commented [JS14]: Appears that much of this information is available and previously made available to other public agencies. (See e.g., SCAG, PDF p. 25, https://weho.granicus.com/MetaViewer.php?view_id=22&clip_id=35556&meta_id=193419.)

Commented [JS15]: Additional reporting is necessary. The USC Specific Plan DA annual review is inadequate. Based on PRA records, this Office has identified numerous discrepancies (e.g., missing annual reports, lack of information on DA compliance terms, failure to implement operational public benefits, etc.). So too, we have made repeated attempts with staff to get answers with no response in months.

Commented [JS16]: In 2010, USC anticipated undergraduate/graduate student enrollment would be roughly 36,000 by 2030 (DEIR, p. I-9). Yet, based USC numbers, USC has grown to well beyond that (see e.g., USC Financial Report, PDF p. 10 [2019 Academic year totals 47,500]; USC, Facts and Figures [2021-22 academic year totals 49,500]).

Commented [JS17]: The City's newly adopted Housing Element may be implicated. (See Draft Housing Element, Appx. 4.1 [includes some of the Co-Living Facilities listed in Exhibit C].)

Commented [JS18]: Student Housing should not be counted as RHNA housing (see e.g., HCD 2021 Letter to Davis, PDF p. 5).

EXHIBIT A: PROPOSED NSO DISTRICT AMENDMENT

The Department of City Planning shall provide notice and opportunity for the public to participate in said report to the Area or City Planning Commission.

###

EXHIBIT A: PROPOSED NSO DISTRICT AMENDMENT

LAMC § 12.21.W.52. Project(s) in Neighborhood Stabilization Overlay (NSO) Districts in the R2, RD, R3, RAS, R4, R5, CR, C1, C1.5, C2, C4 C5, or CM zones that create at least one dwelling unit with five or more habitable rooms. (Added by Ord. No. 180,219, Eff. 11/16/08.)

- a. Findings. In addition to the findings otherwise required under this section relating to Conditional Use Permits, and the requirements of Section 12.21 A.4.(a) of this Code relating to Off-Street Automobile Parking, the Zoning Administrator shall make the following findings:
1. That the Project [or Co-Living Facility](#) provides additional on-site parking under Section 13.12 C.2. of this Code;
 2. That there is no detrimental concentration of large scale, campus serving housing within a one-thousand-foot radius of the proposed Project; ~~and~~
 - ~~3.~~ That the Project [or Co-Living Facility](#) conforms to any applicable Historic Preservation Overlay Zone (HPOZ) or Specific Plan; ~~and~~.
 - ~~4.~~ [The Project or Co-Living Facility will not result in the loss of any Affordable Housing Units or Naturally Occurring Affordable Housing; satisfy all replacement units in a manner consistent with Section 13.12; and will not impede the City's ability to meet its RHNA obligations per applicable Housing Element.](#)
~~3.~~

###

EXHIBIT B

EXHIBIT B: USC ENROLLMENT (ANTICIPATED V. ACTUAL)

ACADEMIC PERIOD		ANTICIPATED ENROLLMENT [a]			ACTUAL ENROLLMENT		
		Undergraduate	Graduate	Total	Undergraduate	Graduate	Total
2009	2010	16,023	14,805	30,828	16,751	18,073	34,824 [b]
2010	2011	16,103	14,951	31,055	17,380	19,516	36,896 [c]
2011	2012	16,184	15,099	31,283	17,414	20,596	38,010 [d]
2012	2013	16,266	15,248	31,514	18,316	21,642	39,958 [e]
2013	2014	16,347	15,399	31,746	18,445	22,923	41,368 [f]
2014	2015	16,429	15,551	31,980	18,740	23,729	42,469 [g]
2015	2016	16,512	15,705	32,216	18,810	24,591	43,401 [h]
2016	2017	16,595	15,860	32,454	18,794	25,077	43,871 [i]
2017	2018	16,678	16,016	32,694	19,170	26,517	45,687 [j]
2018	2019	16,762	16,175	32,936	19,907	27,403	47,310 [k]
2019	2020	16,846	16,334	33,180	20,351	27,970	48,321 [l]
2020	2021	16,930	16,496	33,426	19,606	26,501	46,107 [m]
2021	2022	17,015	16,659	33,674	19,889	27,439	47,328
2022	2023	17,101	16,823	33,924	20,175	28,411	48,586
2023	2024	17,187	16,990	34,176	20,466	29,417	49,883
2024	2025	17,273	17,157	34,431	20,761	30,459	51,219
2025	2026	17,360	17,327	34,687	21,060	31,537	52,597
2026	2027	17,447	17,498	34,945	21,363	32,654	54,017
2027	2028	17,535	17,671	35,206	21,671	33,810	55,481
2028	2029	17,623	17,846	35,468	21,983	35,007	56,991
2029	2030	17,711	18,022	35,733	22,300	36,247	58,547
2030	2031	17,800	18,200	36,000	22,622	37,530	60,152
CAGR		0.50%	0.99%		1.44%	3.54%	

NOTES:

- a: Draft EIR, APP-J, Employment, Housing and Population Impacts Assessment, PDF p. 29, https://planning.lacity.org/eir/USC/Feir/files/USC%20Appendix%20J%20-%20Emp-Hsg-Pop%20Tech%20Report%205_13_10.pdf.
- b: USC 2010 Financial Report, PDF p. 15, <https://customsitesmedia.usc.edu/wp-content/uploads/sites/501/2019/02/19101238/2010-USC-Financial-Report.pdf>.
- c: USC 2011 Financial Report, PDF p. 16, <https://customsitesmedia.usc.edu/wp-content/uploads/sites/501/2019/02/19101237/2011-USC-Financial-Report.pdf>.
- d: CDS 2011-2012, PDF p. 2, https://oir.usc.edu/wp-content/uploads/2015/11/CDS_2011-2012-public1.pdf; USC 2012 Financial Report, PDF p. 21, <https://customsitesmedia.usc.edu/wp-content/uploads/sites/501/2019/02/19101236/2012-USC-Financial-Report.pdf>.
- e: CDS 2011-2012, PDF p. 2, https://oir.usc.edu/wp-content/uploads/2015/10/CDS-2012-2013-public_new3.pdf.
- f: CDS 2013-2014, PDF p. 2, https://oir.usc.edu/wp-content/uploads/2015/11/CDS_2013-2014_public.pdf.
- g: CDS 2014-2015, PDF p. 2, <https://oir.usc.edu/wp-content/uploads/2015/11/CDS-2014-15.pdf>.
- h: CDS 2015-2016, PDF p. 2, https://oir.usc.edu/wp-content/uploads/2017/05/CDS-2015-2016_2.pdf; USC 2016 Financial Report, PDF p. 5, <https://customsitesmedia.usc.edu/wp-content/uploads/sites/501/2019/02/19101234/2016-USC-Financial-Report.pdf>.
- i: CDS 2016-2017, PDF p. 3, https://oir.usc.edu/wp-content/uploads/2015/10/CDS_2016-2017.pdf.
- j: CDS 2017-2018, PDF p. 3, https://oir.usc.edu/wp-content/uploads/2018/03/CDS_2017-2018_FINAL_2.pdf; USC 2017 Financial Report, PDF p. 5, <https://customsitesmedia.usc.edu/wp-content/uploads/sites/501/2019/02/19101234/2017-USC-Financial-Report.pdf>.
- k: CDS 2018-2019, PDF p. 1, https://oir.usc.edu/wp-content/uploads/2019/06/CDS_2018-2019_FINAL1.pdf; USC 2018 Financial Report, PDF p. 5, <https://customsitesmedia.usc.edu/wp-content/uploads/sites/501/2019/02/19101233/2018-USC-Financial-Report.pdf>.
- l: CDS 2019-2020, PDF p. 1, https://oir.usc.edu/wp-content/uploads/2020/07/CDS_2019-2020_FINAL.pdf; USC 2019 Financial Report, PDF p. 5, <https://about.usc.edu/files/2020/07/USC-2019-Annual-ReportFINAL.pdf>.
- m: CDS 2020-2021, PDF p. 2, https://oir.usc.edu/wp-content/uploads/2021/07/CDS_2020-2021.pdf; USC 2020 Financial Report, PDF p. 5, <https://about.usc.edu/files/2021/04/2020-Annual-Financial-Report.pdf>.

RED: Forecasted where total enrollment equals the sum of undergraduate and graduate enrollment assumed to grow by 1.44% and 3.54% CAGR, respectively.

EXHIBIT C

EXHIBIT C: CO-LIVING FACILITIES SURVEYED

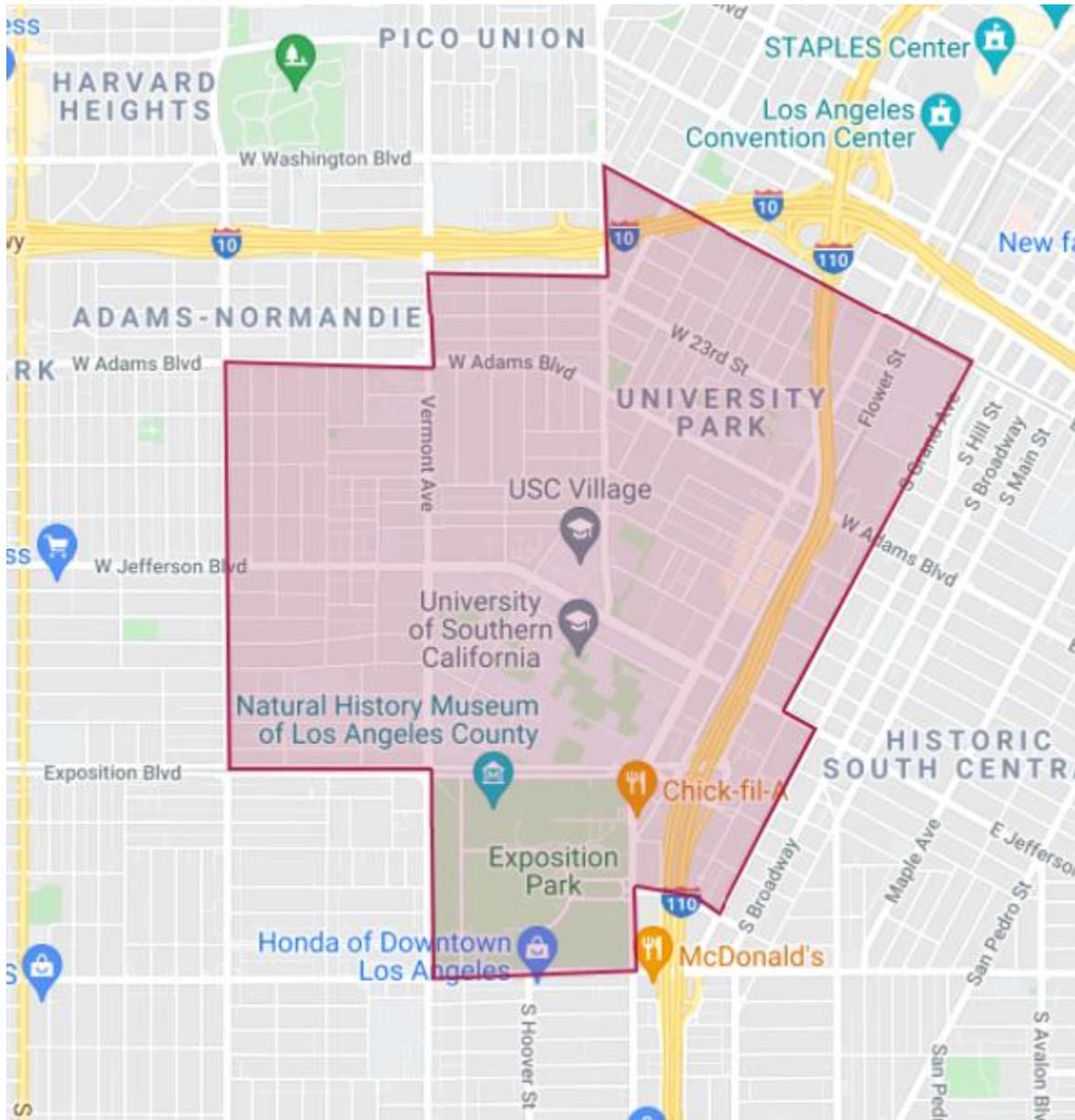
OPERATOR LISTING	ZIMAS	APN	ADDRESS	BED	BATH	ZONE
Southland Dev.	ZIMAS	5037022013	1067 LEIGHTON AVE	8	8	RD1.5
Tripalink	ZIMAS	5040001014	1580 W. 30TH ST.	16	8	R3
Tripalink	ZIMAS	5040002008	3102 KENWOOD AVE.	3	2	QR3-1
Tripalink	ZIMAS	5040005011	1369 W. 36TH ST.	12	13	RD1.5
Tripalink	ZIMAS	5040005027	1374 W. 35TH PL.	6	4	RD1.5
Tripalink	ZIMAS	5040007026	1259 W 36TH PL.	12	12	RD1.5
Tripalink	ZIMAS	5040008019	1324 W 36TH ST.	2	1	RD1.5
Tripalink	ZIMAS	5040011037	1384 W 37TH PL.	4	2	RD1.5
Tripalink	ZIMAS	5040013001	1296 W. 37TH PL.	37	20	RD2
Southland Dev.	ZIMAS	5040013006	1282-90 W 37	54	54	RD2
Southland Dev.	ZIMAS	5040014020	1205 W 37 DR	5	5	RD2
Southland Dev.	ZIMAS	5040014020	1207 W 37TH DR	6	6	RD2
Southland Dev.	ZIMAS	5040014027	1245 W 37 DR	10	10	RD2
Tripalink	ZIMAS	5040015010	1250 W. 37TH ST.	17	9	RD2
Southland Dev.	ZIMAS	5040015024	1223 W 37 PL	10	10	RD2
Southland Dev.	ZIMAS	5040015034	1279 W 37 PL	12	10	RD2
Southland Dev.	ZIMAS	5040017011	1196 W 36 ST	8	8	RD1.5
Tripalink	ZIMAS	5040017025	1230 W. 36TH ST.	12	12	RD1.5
Southland Dev.	ZIMAS	5040017031	1201 W 36 PL	13	12	RD1.5
Tripalink	ZIMAS	5040017032	1231 W 36TH PL.	12	12	RD1.5
Tripalink	ZIMAS	5040018009	1224 W 35TH ST.	6	6	RD1.5
Tripalink	ZIMAS	5040018020	1193 W 36TH PL.	17	15	RD1.5
Tripalink	ZIMAS	5040023019	3009 S. BUDLONG AVE.	4	2	RD2
Southland Dev.	ZIMAS	5040029026	1142 W 36 ST	27	28	RD1.5
Southland Dev.	ZIMAS	5040030042	1170 W 36 PL	18	18	RD1.5
Southland Dev.	ZIMAS	5040030046	1130-36 W. 36TH P.	33	33	RD1.5
Tripalink	ZIMAS	5041018012	1451 W. 36TH PL.	16	16	R2
Tripalink	ZIMAS	5041028028	1430 W. 37TH ST.	18	18	R2
Tripalink	ZIMAS	5054026003	1409 W 25 ST.	6	6	C2
Tripalink	ZIMAS	5055003018	1354 W. 24TH	8	6	RD2
Tripalink	ZIMAS	5055010001	2909 ORCHARD AVE.	3	3	R4
Tripalink	ZIMAS	5055016028	1200 W 24TH ST.	10	6	RD2
Tripalink	ZIMAS	5055019013	1277 W 23RD ST.	10	6	RD2
Tripalink	ZIMAS	5055021032	1164-76 W 24TH ST.	15	20	RD2
Southland Dev.	ZIMAS	5055025001	1180 W ADAMS	4	5	RD1.5
Tripalink	ZIMAS	5055030006	1115 W. 30TH ST.	14	13	RD1.5
Tripalink	ZIMAS	5058020006	1815 W. ADAMS BLVD	20	20	C2
Tripalink	ZIMAS	5058029029	1729 W ADAMS BLVD.	12	8	C2
Southland Dev.	ZIMAS	5124006019	1032 W 22 ST	7	7	RD2
Southland Dev.	ZIMAS	5124012018	2340 PORTLAND ST.	7	9	RD2
Southland Dev.	ZIMAS	5124012022	2350-52 PORTLAND	7	4	RD2

NOTE: Full URLs embedded into hyperlinks and further available upon request.

EXHIBIT D

EXHIBIT D: NSO EXPANSION AREAS

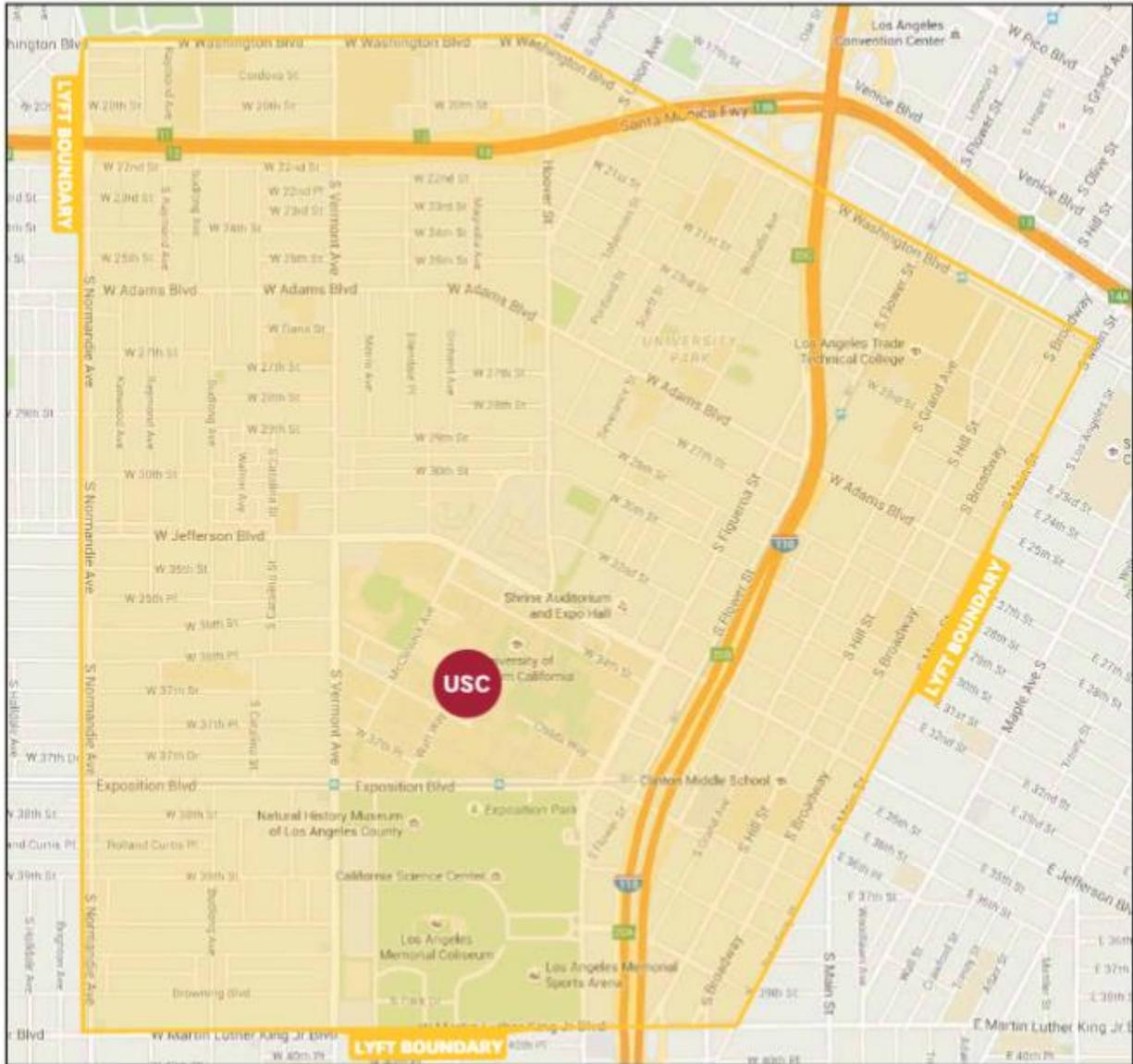
USC Patrol Boundaries¹



¹ See <https://dps.usc.edu/patrol/>; see also https://www.google.com/maps/d/u/0/viewer?mid=19QEcvdID94YnrRAjAj4_9KjQvc&ll=34.025347740754206%2C-118.2842803&z=14.

EXHIBIT D: NSO EXPANSION AREAS

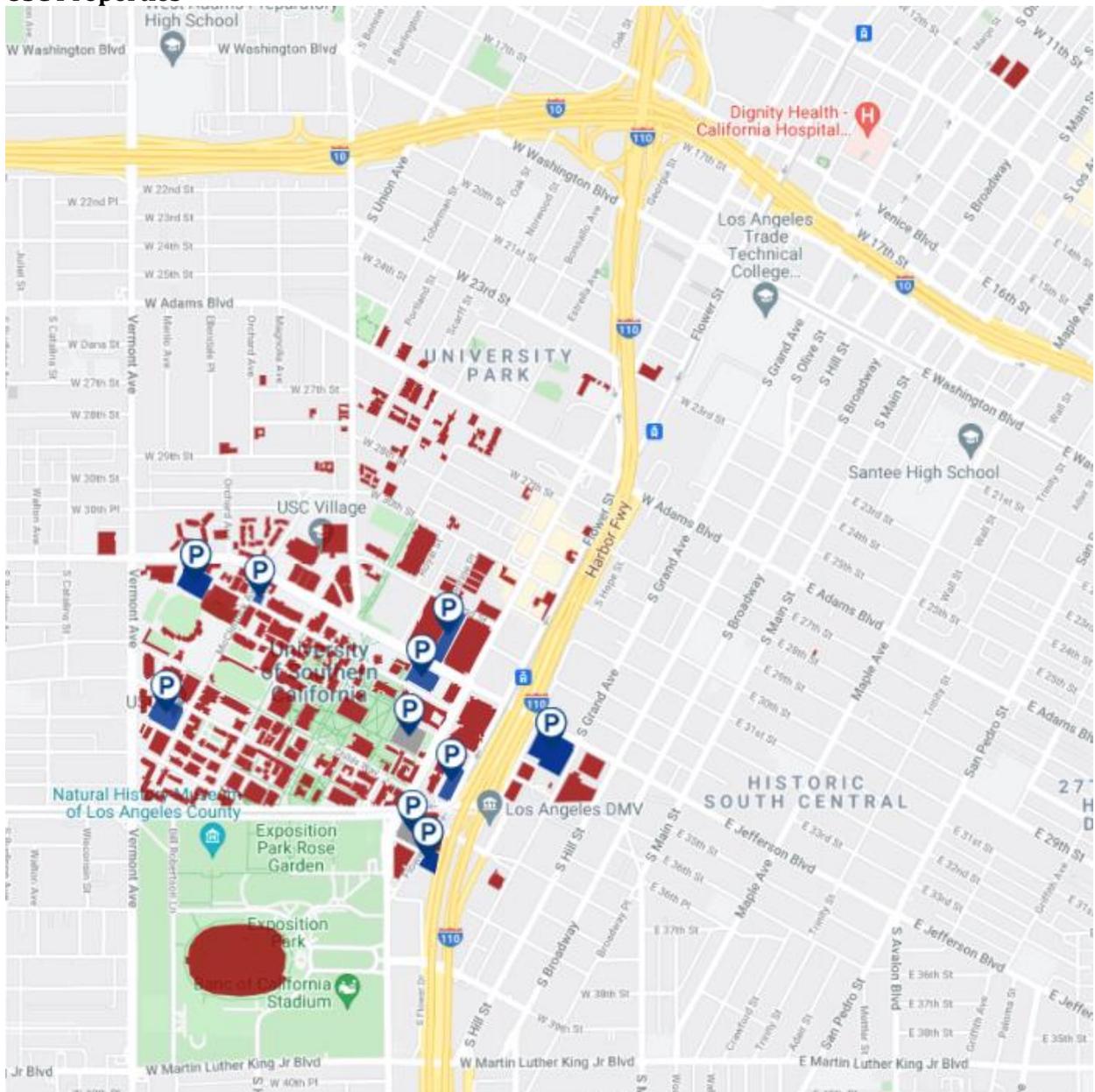
USC Lyft Ride Program Boundaries²



² See <https://transnet.usc.edu/index.php/campus-cruiser-program/how-to-use-lyft/>; see also https://transnet.usc.edu/wp-content/uploads/2019/02/SafeRides_1319Lyft_Map.pdf.

EXHIBIT D: NSO EXPANSION AREAS

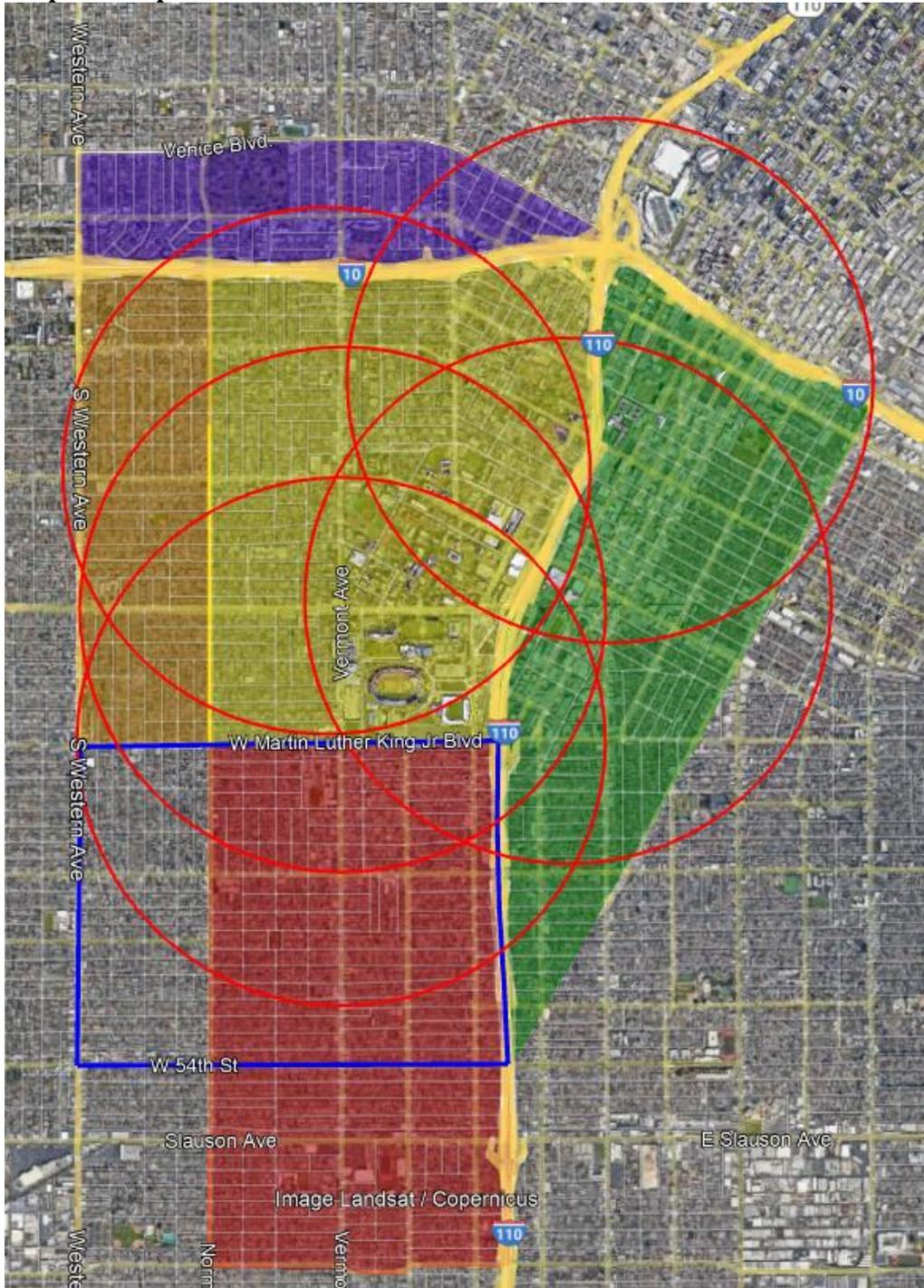
USC Properties³



³ See <https://map.concept3d.com/?id=1928#!s/?ct/53723,53722,55414,55415,55418>.

EXHIBIT D: NSO EXPANSION AREAS

Proposed Expansion of NSO District



Red Radius (1-mile of select USC Properties)

Yellow (current NSO District)

Orange (Proposed Subarea A)

Red (Proposed Subarea B)

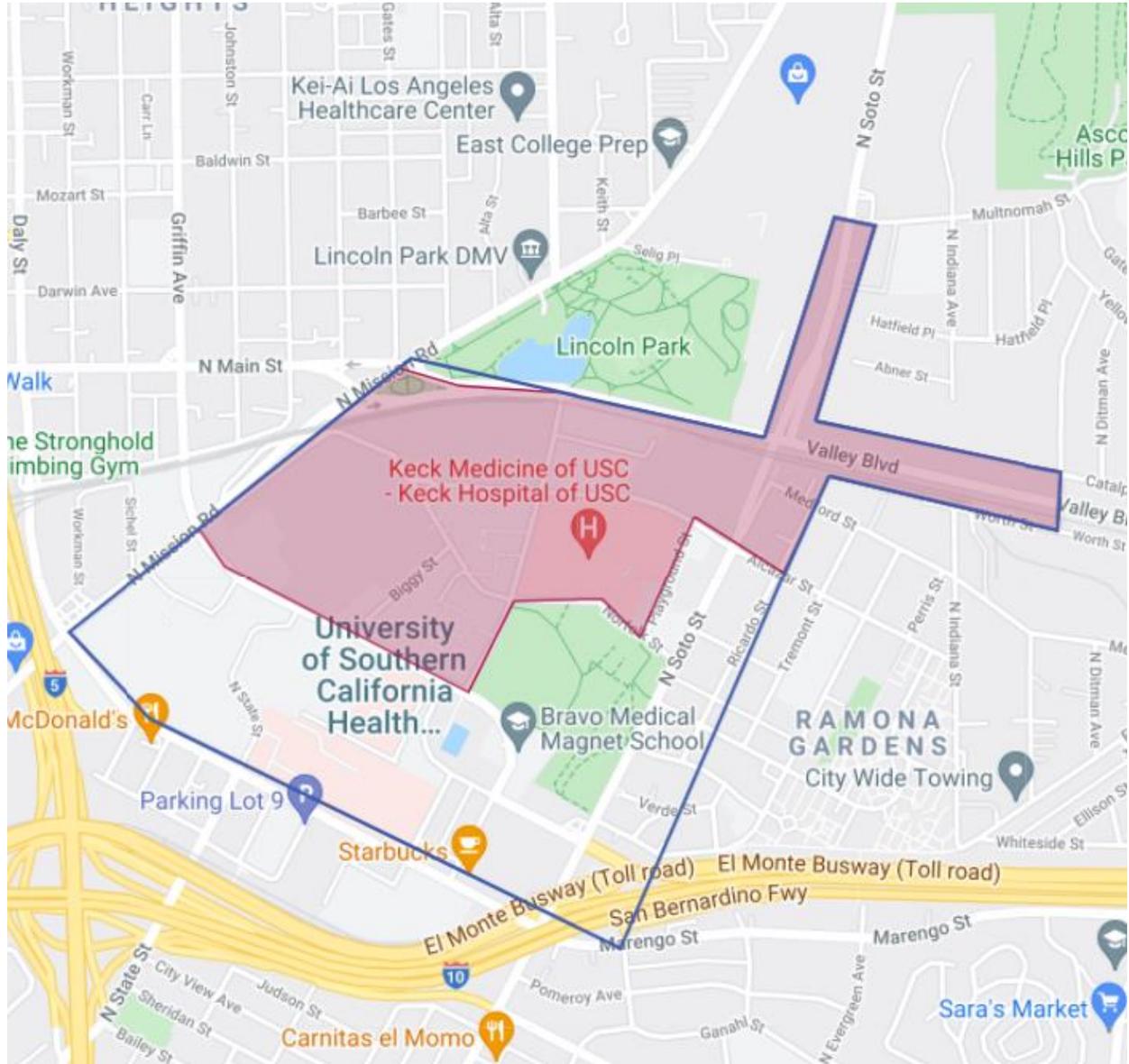
Green (Proposed Expansion East of 110 Freeway [bounded by San Pedro St.])

Purpose (Proposed Expansion North of 10 Freeway [bounded by Venice Blvd.])

Blue Outline (Proposed Expansion South of MLK Blvd. [bounded by 54th St. and Western Ave.])

EXHIBIT D: NSO EXPANSION AREAS

USC Patrol Boundaries⁴



⁴ See <https://dps.usc.edu/patrol/>; see also <https://www.google.com/maps/d/u/0/viewer?mid=1yPl2SVDCoEMCyEXWnKgFPCHUpTw&ll=34.06324562451415%2C-118.20013411360776&z=16>.

EXHIBIT D: NSO EXPANSION AREAS

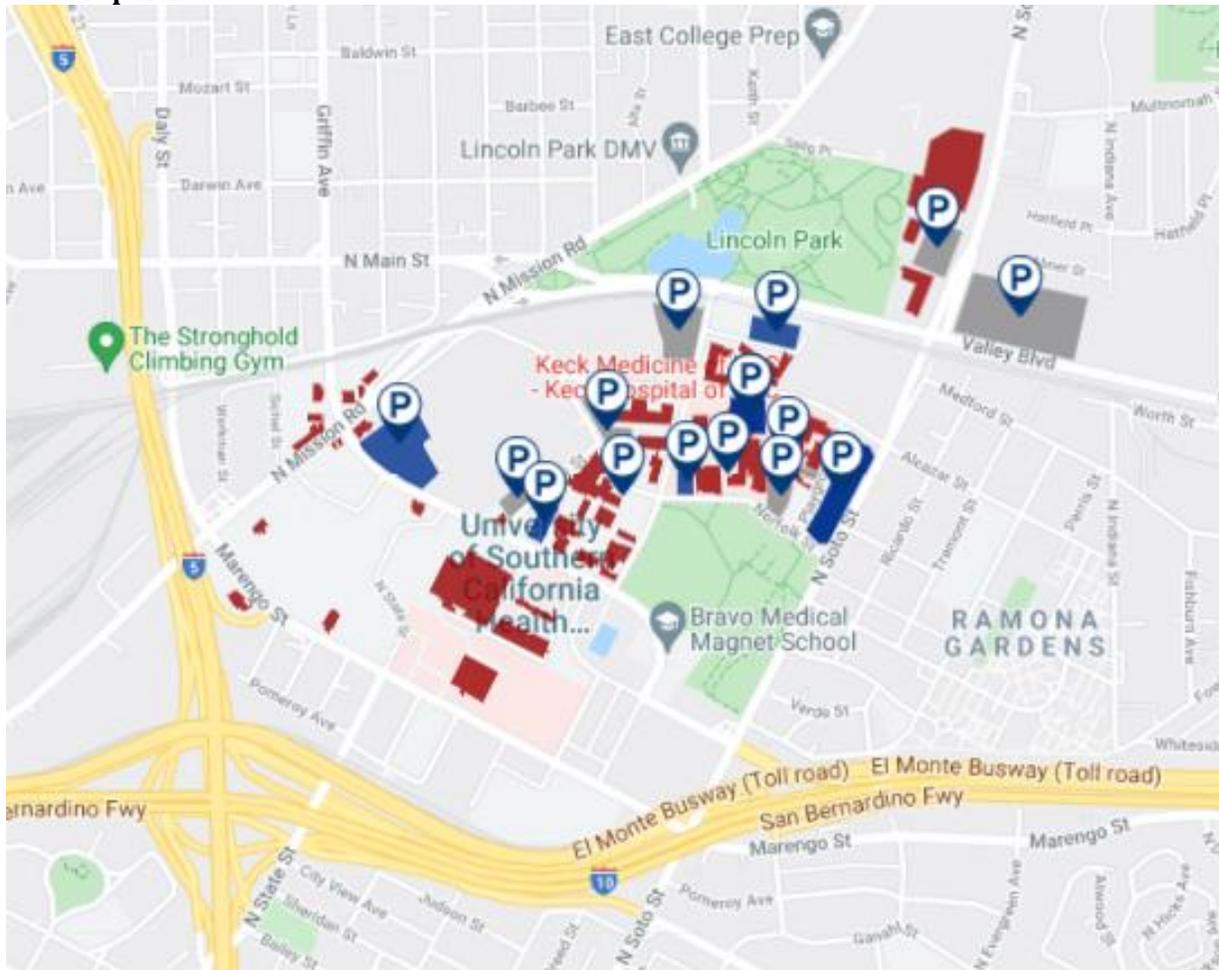
USC Transportation Program Boundaries⁵



⁵ See <https://transnet.usc.edu/index.php/campus-cruiser-program/how-to-use-lyft/>; see also <https://transnet.usc.edu/index.php/campus-cruiser-program/service-boundaries/>.

EXHIBIT D: NSO EXPANSION AREAS

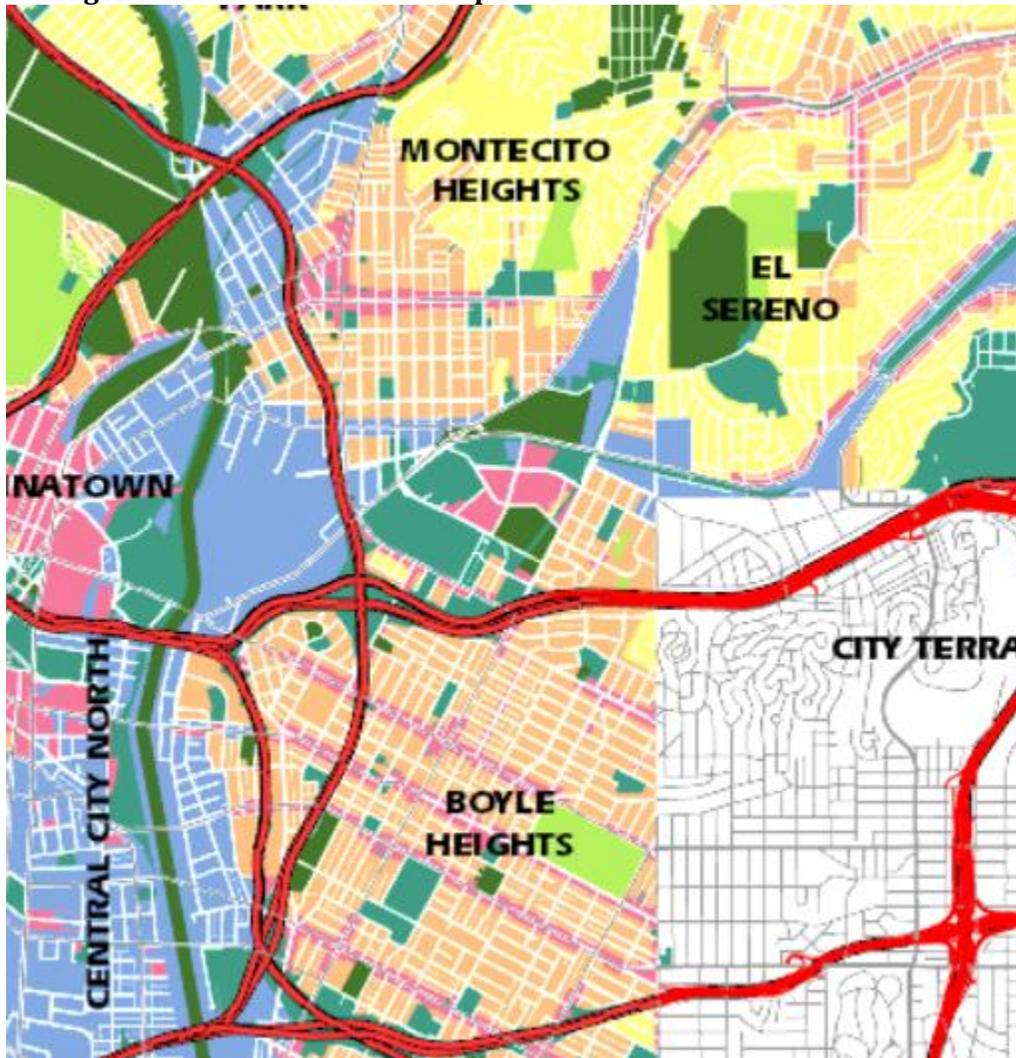
USC Properties⁶



⁶ See <https://map.concept3d.com/?id=1928#!s/?ct/53723,53722,55414,55415,55418>.

EXHIBIT D: NSO EXPANSION AREAS

Zoning Around Health Science Campus⁷



⁷ See ZIMAS (Commercial and Low Medium Residential zones shaded in pink and orange respectively), <http://zimas.lacity.org/>.

EXHIBIT D: NSO EXPANSION AREAS

Proposed Creation of NSO District



Red Radius (1-mile of select USC Properties)