

**DEPARTMENT OF  
CITY PLANNING**

COMMISSION OFFICE  
(213) 978-1300

CITY PLANNING COMMISSION

SAMANTHA MILLMAN  
PRESIDENT

CAROLINE CHOE  
VICE-PRESIDENT

MARIA CABILDO  
MONIQUE LAWSHE  
HELEN LEUNG  
KAREN MACK  
DANA M. PERLMAN  
ELIZABETH ZAMORA

**CITY OF LOS ANGELES  
CALIFORNIA**



KAREN BASS  
MAYOR

**EXECUTIVE OFFICES**

200 N. SPRING STREET, ROOM 525  
LOS ANGELES, CA 90012-4801  
(213) 978-1271

VINCENT P. BERTONI, AICP  
DIRECTOR

SHANA M.M. BONSTIN  
DEPUTY DIRECTOR

ARTHI L. VARMA, AICP  
DEPUTY DIRECTOR

LISA M. WEBBER, AICP  
DEPUTY DIRECTOR

April 28, 2023

Los Angeles City Council  
c/o Office of the City Clerk  
City Hall, Room 395  
Los Angeles, California 90012

Attention: PLUM Committee

Dear Honorable Members:

**SUPPLEMENTAL INFORMATION FOR THE CROSSINGS CAMPUS PROJECT; CF 23-0361**

At its meeting of February 9, 2023, the City Planning Commission (CPC) determined that the Crossings Campus Project (Project) was adequately assessed in the previously certified Environmental Impact Report (EIR) (ENV-2021-9507-EIR), certified by the City of Culver City on December 5, 2022, and adopted the Project's Mitigation Monitoring Program, Environmental Findings and Statement of Overriding Considerations, and recommended approval of an amendment to the West Adams – Baldwin Hills – Leimert Community Plan Implementation Overlay (CPIO) and an amendment to the Exposition Corridor Transit Neighborhood Plan (TNP), approved a Site Plan Review and approved a Waiver of Dedication and Improvements for the Crossing Campus Project (Project) Case No. CPC-2021-9506-CPIO-SP-SPR-WDI.

Senate Bill (SB) 166 was adopted on September 29, 2017 and amended Government Code Section 65863, the No Net Loss Law, to require sufficient adequate sites to be available at all times through the Housing Element Planning period to meet a jurisdiction's remaining unmet Regional Housing Needs Assessment (RHNA) goals for each income category. Pursuant to SB 166, as jurisdictions make decisions regarding zoning and land use, or development occurs, jurisdictions must assess their ability to accommodate new housing in each income category on the remaining sites in their housing element site inventories. A jurisdiction must add additional sites to its inventory if land use decisions or development results in a shortfall of sufficient sites to accommodate its remaining housing need for each income category. In particular, a jurisdiction may be required to identify additional sites if a jurisdiction rezones a site or approves a project at a different income level or lower density than showing in the site's inventory.

The 2021-2029 Housing Element (Housing Element) identified the Project Site as a Housing Element Site and allocated 42.75 or approximately 43 Low Income Units to the Site. SB 166 requires findings be made to demonstrate that the reduction on an individual project site in allocated density is consistent with the City's General Plan and that the remaining sites identified in the Housing Element are adequate to meet the City's RHNA's allocation. Attached are the Project's Findings which demonstrate that the Project's reduction in allocated density is consistent with the City's Housing Element and other applicable General Plan Elements and that the City has remaining capacity to accommodate the 42.75 Low Income Units at other Housing Element identified sites located throughout the City. Staff recommends that the attached findings be

PLUM Committee

CF 23-0361

Page 2

adopted as part of the Project's request to amend the West Adams – Baldwin Hills – Leimert Community Plan Implementation Overlay (CPIO), Finding No. 1 "The Specific Plan Amendments Will Further the Purposes, Intent and Provisions of the General Plan (Charter Section 556), for Case No. CPC-2021-9506-CPIO-SP-SPR-WDI.

Sincerely,

VINCENT P. BERTONI, AICP

Director of Planning

A handwritten signature in black ink, appearing to read "Bob Babajian". The signature is stylized with a long horizontal stroke at the end.

Bob Babajian

Planning Assistant

VPB:MZ:WL:KK:BB

Supplemental Findings

Exhibit A Project Plans

**1. The reduction is consistent with the General Plan including the Housing Element.**

The West Adams – Baldwin Hills – Leimert Community Plan designates the Project Site for Community Commercial land uses. The Site is zoned C2-2D-CPIO (Commercial Zone, Height District 2 with a Development Limitation, Community Plan Implementation Overlay District). The C2 Zone allows for a wide variety of commercial uses, including office uses. The Project Site’s “CPIO” designation applies to the West Adams–Baldwin Hills–Leimert Community Plan Implementation Overlay, which establishes building setbacks, maximum building heights, and other development standards that supersede the Los Angeles Municipal Code (LAMC) requirements. The Project Site is located in Parcel Group A within the Venice / National - Expo Line Transit-Oriented (TOD) Subarea of the CPIO. The “D” Development Limitation (Ordinance 184,796) adopted with the CPIO further limits FAR to a maximum of 3:1 for 100 percent commercial projects within Parcel Group A of the Venice/National TOD subarea. Finally, the Project Site is within the Exposition Corridor Transit Neighborhood Plan (TNP) which sets additional development regulations and is intended to encourage new residential, mixed-use, commercial, and industrial growth near transit stations along the Metro Expo Line.

The Project Site is currently improved with single-story warehouses that have been converted into retail and office space including a surface parking lot serving the existing uses. The Project Site is adjacent to streets with a mix of office, retail, manufacturing, and residential uses. The Project proposes a five-story office building with space for 1,650 employees. Thus, the Project would maintain a commercial use within a commercial zone and will increase the employment base in the surrounding area.

While the Project does not include a residential component and the 2021-2029 Housing Element (Housing Element) anticipated that the parcel could accommodate up to 42.75 or approximately 43 Low Income Units, the City has capacity to accommodate the remaining Regional Housing Needs Assessment (RHNA) Allocation for the 2021-2029 Planning period. As of April 1, 2023, the City’s remaining RHNA Allocation for the 2021-2029 Planning period is as follows: 112,281 Very Low Income Units and 67,086 Low Income Units. As of April 1, 2023, the City has a remaining capacity of 330,056 Very Low Income Units and 332,096 Low Income Units. Therefore, the City finds that there are adequate remaining sites identified in the Housing Element to accommodate the remaining RHNA Allocation for the 2021-2029 Planning period.

Consistency with the Housing Element

The City’s Housing Element for 2021-2029 was adopted by City Council on November 24, 2021. The Project would be in conformance with following Housing Element goals, objectives, and policies.

**Goal 1: A City where housing production results in an ample supply of housing to create more equitable and affordable options that meet existing and projected needs.**

*Objective 1.1: Forecast and plan for existing and projected housing needs over time with the intention of furthering Citywide Housing Priorities.*

*Policy 1.1.2: Account for existing housing needs when planning for future development by conducting analysis to develop and incorporate a buffer above household projections*

As described above, as of April 1, 2023, the City's remaining RHNA Allocation for the 2021-2029 Planning period is as follows: 112,281 Very Low Income Units and 67,086 Low Income Units. As of April 1, 2023, the City has a remaining capacity of 330,056 Very Low Income Units and 332,096 Low Income Units. Therefore, the City's remaining RHNA Allocation for the 2021-2029 Planning period for Very Low Income Units represents 34 percent of the City's total remaining capacity of Very low Income Units and 20.2 percent of the total remaining capacity for Low Income Units; less than half of the City's total capacity for either affordable housing type. While the Housing Element identified the Project Site as being able to accommodate 42.75 or approximately 43 Low Income Units and the Project would reduce the number of City parcels that allow for residential uses, by one fewer parcel, the City's share of the RHNA Allocation for the 2021-2029 Planning period can be located on other parcels throughout the City. Therefore, the City finds that there are adequate remaining sites in the Housing Element to accommodate the remaining RHNA Allocation for the 2021-2029 Planning period. Thus, consistent with Goal 1, Objective 1.1, and Policy 1.1.2, the City has forecasted for existing and projected housing needs and developed a buffer above household projections that would meet existing and projected needs.

*Objective 1.2: Facilitate the production of housing, especially projects that include Affordable Housing and/or meet Citywide Housing Priorities.*

*Policy 1.2.2: Facilitate the construction of a range of different housing types that addresses the particular needs of the city's diverse households.*

Consistent with Objective 1.2 and Policy 1.2.2, as stated above, the City could meet the remaining RHNA Allocation for the 2021-2029 Planning period for Very Low and Low Income Units through development of the identified remaining sites located throughout the City. While the Housing Element determined that 42.75 units could be located on the Project Site, the City maintains ample capacity to meet the remaining RHNA Allocation for Very Low and Low income units. Thus, the 42.75 or approximately 43 units that were originally allocated to the Project Site could be accommodated on other parcels located throughout the City. Therefore, the reduction would not constrict the Citywide production of Affordable Housing and/or the construction of a range of different housing types, and the Project is consistent with Objective 1.2 and Policy 1.2.2..

Lastly, as discussed in Finding No. 1 of the Project's Letter of Determination dated February 28, 2023, the Project would be consistent with the purposes, intent and provisions of the General Plan and its elements, including the Framework Element, Mobility Element, Health and Wellness Element and Air Quality Element, and the Land Use Element – West Adams – Baldwin Hills - Leimert Community Plan that relate to commercial and economic vitality. Therefore, the reduction is consistent with the General Plan including the Housing Element.

- 2. The remaining sites identified in the Housing Element are adequate to meet the requirements of Section 65583.2 and to accommodate the jurisdiction's share of the regional housing need pursuant to Section 65584. The finding shall include a quantification of the remaining unmet need for the jurisdiction's share of the regional housing need at each income level and the remaining capacity of sites identified in the housing element to accommodate that need by income level.**

The Project is located on a parcel identified in the Inventory of Sites prepared for the 2021-2029 Housing Element (Housing Element) and was anticipated to accommodate 42.75 Low Income Units. As the Project does not propose a residential component, the Project would

result in fewer units by income category on the Project Site than those identified in the Housing Element.

Pursuant to Government Code Section 65863(b)(2), the City finds that while the Project would result in fewer units by income category on the Project Site than those identified in the Inventory of Sites prepared for the Housing Element, the remaining sites identified in the Housing Element are adequate to meet the requirements of Government Code Section 65583.2 and to accommodate the City's share of the regional housing need pursuant to Government Code Section 65584. As of April 1, 2023, the City's remaining RHNA Allocation for the 2021-2029 Planning period is as follows: 112,281 Very Low Income Units and 67,086 Low Income Units. As of April 1, 2023, the City has a remaining capacity of 330,056 Very Low Income Units and 332,096 Low Income Units. Thus the City's RHNA allocation for the 2021-2029 Planning period for Very Low and Low Income Units makes up 34 percent and 20.2 percent of the City's remaining housing capacity, respectively. Therefore, the City finds that there are adequate remaining sites identified in the Housing Element and located throughout the City to accommodate the remaining RHNA Allocation for the Planning Period.