

ATTACHMENT “A”
DISCRETIONARY APPROVAL REQUESTS FOR
ENLIGHTENMENT PLAZA
312-328 NORTH JUANITA AVENUE, 317-345 NORTH MADISON AVENUE,
and 3810-3838 WEST OAKWOOD, LOS ANGELES, CA 90013

The Applicant, Flexible PSH Solutions, Inc., requests approval of the following discretionary actions:

1. Pursuant to **LAMC Section 11.5.6**, as authorized by the Los Angeles Charter Section 555, the Applicant requests approval of a General Plan Amendment to revise the land use designation in the Wilshire Community Plan from Limited Industrial¹ to Commercial Manufacturing to permit the construction of a new Permanent Supportive Housing project which combines Restricted Affordable² units with supportive social services for formerly homeless individuals. The proposed Project contains a maximum of 454 residential dwelling units, including 449 Restricted Affordable units and 5 managers’ units with approximately 11,772 square feet of residential supportive services.
2. Pursuant to **LAMC Section 12.32 F**, the Applicant requests approval of a Zone Change from M1-1 Zone (Limited Industrial) to CM-1 Zone (Commercial Manufacturing) to permit the construction of new Permanent Supportive Housing project which combines Restricted Affordable units with supportive social services for formerly homeless individuals. The proposed Project contains a maximum of 454 residential dwelling units, including 449 Restricted Affordable units and 5 managers’ units with approximately 11,772 square feet of residential supportive services.
 - a. Pursuant to **LAMC Section 11.5.11 (e) and California Government Code 65915(k)**, the Applicant is requesting the following incentives in connection with a 100 percent affordable project:
 - i. A 20% reduction in overall open space requirement to permit 36,580 square feet of Open Space in lieu of providing 45,725 square feet.
 - ii. The elimination of Section VI.6 of the Vermont/Western Transit Oriented District Station Neighborhood Area Specific Plan (SNAP) Development Standards and Design Guidelines along the front property line.
 - iii. To utilize the side yard requirements for the RAS3 zone per LAMC 12.10.5 in lieu of the side yard requirements in the underlying CM zone.
3. Pursuant to **LAMC Section 11.5.7 G**, the Project Applicant requests approval of a Specific Plan Amendment to introduce a new Subarea within the SNAP, Subarea D.2 - Commercial Manufacturing/Permanent Supportive Housing, to permit the construction of qualified Permanent Supportive Housing project that includes Restricted Affordable housing units with supportive social services for formerly homeless. As mentioned previously, this Project proposes a maximum of 454

¹ The Wilshire Community Plan General Plan Map identifies the site with the land use designation of Limited Industrial. ZIMAS identifies the site with the General Plan land use designation of Limited Manufacturing.

² Per LAMC “A residential unit for which rental or mortgage amounts are restricted so as to be affordable to and occupied by Very Low, Low or Moderate Income households, as determined by the Housing and Community Investment Department. (Amended by Ord. No. 182,718, Eff. 10/30/13.)”

residential dwelling units including 449 Restricted Affordable units and 5 managers' units with approximately 11,772 square feet of residential supportive services.

4. Pursuant to **LAMC Section 11.5.7 C and Section 12.A.1** of the SNAP, the Project Applicant requests Project Permit Compliance review.
5. Pursuant to **LAMC. Section 16.05**, the Project Applicant requests the approval of Site Plan Review findings for a project that proposes more than 49 new residential dwelling units.
6. Pursuant to **California Government Code Sections 66473.1, 66474 (Subdivision Map Act) and LAMC Section 17.01 and 17.15**, the Applicant requests approval of a Vesting Tentative Tract Map to permit the merger and re-subdivision of the land and the creation of one ground lot containing 5 air space lots. The Project Applicant also requests to record the Final Map in phases. The requested Lots included:
 - i. Lot 1: Master Ground Lot
 - ii. Airspace Lot 2: Northeast
 - iii. Airspace Lot 3: Southeast
 - iv. Airspace Lot 4: Southwest B
 - v. Airspace Lot 5: Southwest A
 - vi. Airspace Lot 6: Northwest
7. The Applicant requests a Haul Route approval.

The Proposed Project would also request discretionary and ministerial permits and approvals that may be deemed necessary including, but not limited to, the following: shoring, grading, foundation, removal of existing street trees, and building and tenant improvements.

As a separate action, the Applicant may seek approval to vacate a portion of Madison Avenue (between the proposed driveway/round-about and Oakwood Avenue), Oakwood Avenue (between Westmoreland Avenue and Juanita Avenue) , and a portion of Juanita Avenue (fronting the property at 3838 Oakwood Avenue) to allow for a turnaround at the proposed new terminus of Juanita Avenue and Oakwood Avenue. The Proposed Project, as defined above, is not dependent upon this request. Nevertheless, it is being disclosed here and in the Sustainable Communities Environmental Assessment ("SCEA") prepared for the Project for informational purposes and potential future clearance under the California Environmental Quality Act ("CEQA"), if required.

PROJECT SUMMARY

Applicant

Flexible PSH Solutions, Inc. (the “Applicant”) is a California 501(c)3 Not-for-Profit Public Benefit Corporation, created in 2018 to development of permanent supportive housing for the chronically homeless. The Applicant provides an easily replicable, cost-effective model for the provision of services required by tenants in order to stabilize their lives and remain housed long term. Their focus is to provide a highly supportive, caring environment for our tenants, keeping them off the streets.

Flexible PSH Solutions, Inc. is led by John E. Molloy, a veteran of urban planning with more than 30 years of experience in housing, commercial development, and community development programs. Prior to the foundation of Flexible PSH Solutions, Inc. Molloy served as Executive Director of PATH Ventures and led the organization in the development of 12 permanent supportive housing projects, totaling 1,272 units providing supportive housing and services to the (formerly) homeless of Southern California. Molloy also served as the Executive Director of the Sacramento Housing and Redevelopment Agency as well Administrator of the Los Angeles Community Redevelopment Agency.

Project Description

The Applicant proposes to redevelop an approximate 94,623 square foot (2.17 acre) area located at 312 - 328 N. Juanita Avenue, 317 - 345 N. Madison Avenue, and 3810 - 3838 W. Oakwood Avenue in the Wilshire Community Plan of the City of Los Angeles (the “Project Site”). The Project Site is located in the M1-1 zone with a Limited Industrial General Plan land use designation. The Project Site is also located within Subarea D of the Vermont/Western Transit Oriented District Station Neighborhood Area Specific Plan (the “SNAP”), a Specific Plan established by Ordinance No. 173,749 in 2001. The Project Site is currently improved with light industrial/commercial buildings, residential dwelling units and accessory surface parking.

The Applicant proposes to demolish the existing buildings and construct a new Permanent Supportive Housing development consisting of approximately 454 dwelling units and approximately 11,772 square feet of supportive services (the “Project” and “Enlightenment Plaza”). Exclusive of the five managers’ units, the Project would be 100% Restricted Affordable housing serving Extremely Low to Low Income individuals, and available only to target population members.

In order to provide residential uses on the Project Site, the Applicant is requesting and General Plan Amendment to change the Land Use Designation from Limited Industrial to Commercial Manufacturing, a Zone Change to change the zoning from M1 to CM, a Specific Plan Amendment to add a new Subarea to the SNAP that allows both Commercial Manufacturing uses and Restricted Affordable Housing units with supportive services, a Specific Plan Project Permit and Site Plan Review.

The Applicant also requests approval of Vesting Tentative Tract Map No. 82798 for the merger of existing lots to create one master ground lot and the subdivision of five airspace lots. The subdivision area only includes 312-328 N. Juanita Avenue, 317-345 N. Madison Avenue, and 3810-3814 ½ W. Oakwood Avenue (the “Development Site”). Neither the subdivision nor the Development Site include the parcel at 3818 - 3838 W. Oakwood Avenue (APN 5501-001-025),

which is approximately 3,649 square feet in size and currently developed with a 5,663-square-foot two-story office building above a one-level partially subterranean garage. The Project includes renovations to the existing building on this lot, but no changes to the use or building envelope are proposed.

The Project would be constructed on the Development Site, which consists of 2.09-acre³ area (90,974 square feet) within the Project Site improved with three detached dwelling units, three one-story light industrial/storage buildings and a surface parking lot. The Project would include five 8-story buildings: the Northeast Building, Northwest Building, Southeast Building, Southwest Building A and Southwest Building B.

The Project would contain approximately 247,812 square feet of floor area⁴, or approximately 3 times the Buildable Area of the Development Site. The Northeast Building would contain approximately 78,812 square feet, the Northwest Building would contain approximately 49,000 square feet, the Southeast Building would contain approximately 47,000 square feet, the Southwest Building A would contain approximately 39,000 square feet and the Southwest Building B would contain approximately 34,000 square feet. The buildings would range from 92 feet and 3 inches to 95 feet to the highest building element.

Open Space would be provided in a ground floor courtyard, one podium deck and interior common areas. A total of 36,580 square feet for open space is planned for the Project. Courtyards and exterior open spaces would total 30,508 square feet. Interior common open space areas are located in each building providing fitness areas, computer rooms, and community gathering spaces and total 6,072 square feet. Approximately 7,627 square feet of landscaping is proposed throughout the courtyards and podium deck with 114 trees.

The Project would provide 23 parking spaces for the purposes of accommodating guests, supportive services, case management offices and the managers' units. Vehicle parking is proposed in the Southwest Building A, Southeast Building and Northeast Building. Vehicle access would be provided via a two-way driveway on Juanita Avenue to the Southwest Building A parking, via a two-way driveway on Madison Avenue to the Southeast Building parking and via a two-way driveway on Oakwood Avenue to the Northeast Building parking. The Project will provide 227 long-term bicycle parking spaces and one bike rack for every 50 feet of lot frontage of the Development Site, for a total of 24 short-term bicycle parking stalls and a combined total of 251 bicycle parking stalls.

The main access to the Project would be from Madison Avenue, where a roundabout for pick-up and drop-off opportunities is designed. The roundabout opens to a large central courtyard. The courtyard also informs building orientation, massing breaks, and material selection. The courtyard also creates a large common area that hopes to create a relationship with the PATH ventures project located across Madison Avenue. The Project intends to employ modular construction, which also informs the architectural design and façade rhythms.

Separate standalone Street Vacation applications may be pursued with the City of Los Angeles for portions of Madison, Oakwood and Juanita Avenues independent of the main entitlements. The future vacation of portions of Madison Avenue, Juanita Avenue, and Oakwood Avenue would allow for secured and controlled access to the Project Site and the adjacent PATH project, and to

³ The gross lot area, to the centerline of the streets, includes 112,664 square feet of floor area. Buildable Area, as defined by LAMC Section 12.03, of the Development Site is approximately 87,466 square feet.

⁴ See below Development Standards for floor area definition.

provide an opportunity to facilitate transit access, and enhance landscaping and open space features. The operation of the Project is not dependent upon the future vacation of these roadways.

Table 1. Project Data Summary

PROJECT SITE			
	<u>Lot Area (SF)</u>	<u>Acres</u>	<u>APN</u>
Lots 1 - 6, 12- 15	84,192.0	1.93	APN 5501-001-025
Lot 19	6,781.6	0.16	APN 5501-001-023
Lot 18	<u>3,649.4</u>	<u>0.08</u>	APN 5501-001-800
	94,623.1 ⁵	2.17	
DEVELOPMENT SITE (same as Subdivision Ground Lot)			
	<u>Lot Area⁶ (SF)</u>	<u>Acres</u>	<u>APN</u>
Lots 1 - 6, 12- 15	84,192.0	1.93	APN 5501-001-025
<u>Lot 19</u>	<u>6,781.6</u>	<u>0.16</u>	APN 5501-001-023
Total	90,974	2.09	
DENSITY⁷			
Permitted	<u>Lot Area (SF)</u>	<u>Ratio (Unit per SF)</u>	<u>Units</u>
Development Site	90,974	unlimited	unlimited
Proposed	<u>Units</u>	<u>%</u>	
<u>Total</u>	454	100%	
Studios	370	81.5%	
One-Bedroom	71	19.2%	
Two-Bedroom	13	18.3%	
FLOOR AREA⁸			
Permitted		<u>FAR</u>	<u>Buildable Area (SF)</u>
Subarea D.2		3 to 1	87,466
Proposed		<u>FAR</u>	<u>Floor Area (SF)</u>
Total		2.8 to 1	247,812
HEIGHT AND STORIES			
Permitted	<u>Height (ft)</u>	<u>Stories</u>	
Subarea D.2	unlimited	unlimited	

⁵ The gross lot area, to centerline of the streets, includes 112,664 square feet of lot area.

⁶ The total horizontal area within the lot lines of a lot. (LAMC § 12.03.)

⁷ Calculated based on Development Site, not Project Site, as no changes to the use or building envelope are proposed for Lot 18.

⁸ Calculated based on Development Site, not Project Site, as no changes to the use or building envelope are proposed for Lot 18.

Proposed To the Highest Building Element	95	8		
YARDS AND SETBACKS				
Required (Feet) for CM Zone	<u>Front (Madison)</u>	<u>Front (Oakwood)</u>	<u>Front (Juanita)</u>	<u>Interior Sides/Rear</u> 5 for first two stories, plus 1 for each additional story
	0	0	0	
Required (Feet) for RAS3 Zone for side/rear per LAMC § 11.5.11(e) Incentive	0	0	0 ⁹	5
Provided (Feet)	0 to 21' - 0"	0 to 37' 6"	2' - 10" to 17' - 0"	5' - 1" to 13' - 11"
STEP BACKS				
Required (Feet)	<u>Front (Madison)</u>	<u>Front (Oakwood)</u>	<u>Front (Juanita)</u>	<u>Interior Sides/Rear</u>
	No structure shall exceed 30' with in 15' of the front property line			
	<u>Reduction</u>	<u>Reduction</u>	<u>Reduction</u>	<u>Reduction</u>
LAMC § 11.5.11 (e) Incentive	Eliminate requirement	Eliminate requirement	Eliminate requirement	Eliminate requirement
OPEN SPACE				
Required	<u>SF per Unit</u>	<u>Total Units</u>	<u>Square feet</u>	
< 3 Habitable rooms	100	441	44,100	
3 Habitable rooms	125	13	1,625	
> 3 habitable rooms	175	-	-	
Total			45,725	
		<u>Reduction</u>	<u>Square feet</u>	
LAMC § 11.5.11 (e) Incentive		20%	36,580	
Proposed	<u>Square Feet</u>	<u>%</u>		
Outdoor	30,508	83%		
Indoor	<u>6,072</u>	17%		
Combined Total	36,580	100%		
LANDSCAPING				
	<u>Required</u>	<u>Total Required</u>	<u>Provided</u>	
Landscaping	25% of Outdoor OS	7,627 SF	7,627 SF	
Trees	1 per 4 units	114 trees	114 trees	

⁹ No change is being request to the existing two-story office building

PARKING			
Required	Ratio	Units	Spaces
PSH Units	0 per unit	449	0
Guest, Managers' Units and Support Services Parking	1 per 20 units	454	23
Proposed Total			23
BICYCLE PARKING			
Required	Ratio	Units	Stalls
<u>Residential</u> Total	0.5 per 1 unit	454	227
Street Frontage	Ratio	Frontage (Feet)	Racks
Total	1 rack per 50 feet	597.75	12 (24 stalls)
Total (Combined)			251

Architectural Design Narrative

The proposed Enlightenment Plaza campus is designed to promote wellness and sustainability. Enlightenment Plaza has aligned the site planning and programming processes with a vision of promoting and protecting health, wellness and sustainability across community life. The site plan design focuses community, mind and nourishment to promote physical and mental wellness. The campus is designed with five multi-family residential buildings surrounding a large open park and paseo space (the “Park”). The multi-family residential buildings are Restricted Affordable housing units utilized as part of a Permanent Supportive Housing project for formerly homeless individuals that are combined with on-site supportive services.

The Park would provide physical well-being with community gardens, outdoor fitness areas and a dog run for activity and training. Mental wellness will be encouraged through resident supportive counseling services, nearby clinical assistance (outside of Enlightenment Plaza), meeting rooms for teaching and seminars, shower rooms for the homeless, butterfly-friendly gardens, sensory plantings, indoor/outdoor yoga spaces and water features. Enlightenment Plaza will continue to foster resiliency, equity, ownership and a sense of community to residents.

Architecture is informed by the open park and programmed social spaces. The Park is envisioned to influence the location of social spaces within each of the five Permanent Supportive Housing buildings. Later informing initial building orientation, massing breaks, and eventually material selection. The Park additionally influences building articulation. The design locates many of the common social spaces at the edges of the 5 buildings. These social spaces take many forms and scales varying from a common podium courtyard, to common decks and down to individual private balconies. Each of these upper social spaces provides visual connection back to the Park and Paseo. These decks not only provide an additional sense of security onto the Park and Paseo, but become the first level of articulation for each of the 5 buildings. Further building articulation is provided with building massing, fenestration locations, and material color and texture choices.

Additionally, the new Permanent Supportive Housing buildings will provide a sense of community and equity to residents via clean and accessible apartment homes, interior fitness areas, serene roof decks and safety through visually connected spaces. Redeveloping these parking lots to become Enlightenment Park, adjacent to PATH Metro Villas and La Kretz Villas, will transform this neighborhood into a sustainable collection of Permanent Supportive Housing supported by wellness programs and the community.

Residential Supportive Services

Enlightenment Plaza will offer a Service Plan dedicated to assisting the residents that are homeless individuals, including those experiencing chronic homelessness with special needs as defined by HUD, unaccompanied homeless persons with disabling conditions, and other homeless individuals with conditions of mental illness and/or chronic medical conditions, developmental disabilities, substance abuse, and HIV/AIDS or co-occurring disorders.

Each resident will be provided case management services as well as mental health services. The program would use the Housing First approach that prioritizes permanent housing for those experiencing homelessness so that the resident may pursue personal goals and improve their quality of life. This approach will be achieved by providing integrated services that allow for a wide range of mental health, substance abuse, and medical and functional needs of the resident to be addressed simultaneously and directly by on-site case managers or coordinated with the appropriate community provider.

Professional staff and community services providers will be on-site to ensure sufficient services and activities are available to meet the residents' needs. All service personnel are trained in evidence-based interventions and other case management approaches emphasizing housing stabilization, self-sufficiency and skill building, aging in place interventions, mainstream benefits assistance, peer advocacy, wellness, recovery and community integration.

Enlightenment Plaza will provide supportive services and amenities including:

- New tenant orientation to identify the types of services and activities that would benefit them.
- Case management services to develop an Individual Service Plan for each resident to identify short- and long-term goals to be achieved, along with a plan for monthly reviews, at a minimum, of the resident's progress.
- Mental health services on-site that include psychiatric assessments, individual and group therapy, and crisis intervention with a focus on achieving wellness, recovery and housing stability.
- Substance abuse treatment services that address recovery planning and relapse prevention strategies, along with outpatient and inpatient provider referral and treatment options.
- Recreational and educational activities to foster a sense of community within the building and engage the residents with the surrounding neighborhood. Residents will have the opportunity to participate in theatre classes and perform plays in the Project's outdoor amphitheater.
- Housing stabilization and retention are the primary goals for each resident. Residents with specific issues or barriers to complying with lease regulations or pay rent will be helped to overcome these issues in order to prevent eviction.

Enlightenment Plaza’s general goals of the Service Plan are to assist the residents in 1) maintaining stable housing, 2) increasing skills and/or income, and 3) achieving self-determined life goals.

The Project will provide a total of 11,772 square feet of Residential Supportive Services including 5,700 square feet dedicated to case manager offices with meeting rooms and 6,072 square feet of interior common open space as permitted in Subarea D.2 of the SNAP.

PROJECT SITE

Project Site

The Project would redevelop an approximate 90,974 square foot area referred to as the Development Site. The Development Site is located within a greater Project Site, which encompasses the majority of the city block bounded by Beverly Boulevard to the south, Madison Avenue to the east, Oakwood Avenue to the north and Juanita Avenue to the west. The Project Site consists of twelve contiguous lots and three Assessor’s Tax Parcels (APNs 5501-001-023, -025, -800).

The Project Site is located in the M1-1 Zone and height district and has a General Plan Land Use designation of Limited Industrial.¹⁰ The Project Site is located in Subarea D of the SNAP which is subject to the use and area regulations of the CM Zone (LAMC Section 12.17.1), except that projects with hotel, motel, apartment hotel, and residential uses are prohibited. The Applicant is requesting approval of a Specific Plan Amendment to the SNAP to create a new Subarea D.2 (See Exhibit B for Specific Plan Amendment and Exhibit C Development Standards) to permit the construction of a Restricted Affordable housing units dedicated to a Permanent Supportive Housing project.

Table 2. Project Site Information

Address	Tract	Block	Lot	APN	Development Site
None	Dayton Heights Tract	V	FR 18	5501-001-025	No
3818 - 3838 W. Oakwood Avenue			FR 18 (Arb 1)		
3812 – 3814 ½ W. Oakwood Avenue			FR 19 (Arb 1)	5501-001-023	Yes
345 N. Madison Avenue, 3810 W. Oakwood Avenue			1	5501-001-800	
339 N. Madison Avenue			2		
333 N. Madison Avenue			3		
327 N. Madison Avenue			4		
321 N. Madison Avenue			5		
317 N. Madison Avenue			6		

¹⁰ The Wilshire Community Plan General Plan Map identifies the site with the land use designation of Limited Industrial. ZIMAS identifies the site with the General Plan land use designation of Limited Manufacturing.

None			FR 19 (Arb 2)		
None			FR 19 (Arb 4)		
None			FR 19 (Arb 5)		
None			FR 19 (Arb 6)		
328 N. Juanita Avenue			15		
322 N. Juanita Avenue			14		
316 N. Juanita Avenue			13		
312 N. Juanita Avenue			12		

The Development Site is currently developed with three small detached residential buildings (one is owner occupied), three small commercial buildings, and surface parking lots. The parcel at 3838 W. Oakwood Avenue, which is within the Project Site but outside of the Development Site, is currently developed with a two-story office building above a one-level partially subterranean garage that will be renovated.

Surrounding Uses

The adjacent properties are improved with a variety of residential, commercial and industrial uses. The Development Site and Project Site are surrounded by parcels that are zoned R4, C2, CM and M1. The adjoining properties to the south are developed with a used-car sales lot and a pest control company in the M1-1 zoned property. The adjoining properties to the west are improved with a manufacturer of stone furnishings and fireplace mantels. Across Madison Avenue to the east is improved with the PATH Affordable Housing Project that provides housing and supportive services similar to those in the proposed Project located in the M1-1 zone (CPC-2014-1602-CU-SPE-SPP-DB-SPR). Across Juanita Avenue to the west is improved with the La Kretz Villas, a 49-unit residential building that combines subsidized and affordable studio units for individuals who have experienced homelessness and/or disabilities located in the R4-1 zone. Also across Juanita Avenue to the west is improved with an office building on a parcel zoned C2-1. Other nearby buildings in the vicinity along Beverly Boulevard include auto repair shops and an animal hospital located on parcels zoned M1-1.

Transit Adjacency

The Project Site is located one block to the west of the Metro Red Line rail station at Vermont Avenue and Beverly Boulevard. The Metro Red Line rail station provides access to the Metro Purple Line at the Wilshire/Vermont station and access to the Metro Expo Line and Metro Blue Line at the 7th Street/Metro Center rail station in downtown Los Angeles. The Metro Rail Expo Line ends in downtown Santa Monica and the Metro Rail Blue Line ends in downtown Long Beach with a stop that connects to the Metro Green Line. The Metro Red Line runs from North Hollywood to Union Station, where riders may access the Metro Gold Line.

The most convenient Metro Rapid Bus stop to the Project Site is Metro Rapid Bus 754, which runs north-south on Vermont Avenue with a stop at Vermont Avenue and Beverly Boulevard, one block to the west of the Project Site. Metro Rapid Bus 754 runs from Sunset Boulevard to the north to the Vermont/Athens Metro Green Line stop to the south. Metro Rapid Bus 754 includes a stop at Exposition Boulevard that accesses the Expo/Vermont Metro Expo Line rail station.

Metro Rapid Bus 754 offers connections to several Metro Rapid Bus lines. To the north, Metro Rapid Bus 754 includes a stop at Hollywood Boulevard which includes a connection to Metro Rapid Bus 780 that runs from the Washington/Fairfax Transit Hub to the west to Colorado

Boulevard and Hill Avenue in Pasadena to the east. To the north at Santa Monica Boulevard, a connection is available to Metro Rapid Bus 704 which runs from Santa Monica to the west to the Patsaouras Bus Plaza/Union Station to the east. The Metro Rapid Bus 754 stop at Wilshire Boulevard provides access to Metro Rapid Bus 720 that runs from Santa Monica to the west to the Commerce Center to the east with stops on 5th and 6th Streets through downtown Los Angeles. At Olympic Boulevard and Vermont Avenue, Metro Rapid Bus 728 runs from Century City to the west to the Patsaouras Bus Plaza/Union Station to the east with stops on Hill and Spring Streets through downtown Los Angeles. At Venice Boulevard and Vermont Avenue, Metro Rapid Bus 733 runs from Santa Monica to the west to Patsaouras Bus Plaza/Union Station to the east with stops on Main and Spring Streets in downtown Los Angeles. Further to the south at Vernon Avenue, Metro Rapid Bus 705 runs from La Cienega Boulevard and Rodeo Road to the west and Santa Monica and San Vicente Boulevards to the north to Long Beach Boulevard and Vernon Avenue to the east.

Two Metro Local Bus lines with stops at Vermont Avenue and Beverly Boulevard are located one block to the west of the Project site. Metro Local Bus 204 runs north-south on Vermont Avenue along the same path as Metro Rapid Bus 754. Metro Local Bus 204 runs from Sunset Boulevard to the north to the Vermont/Athens Metro Green Line stop to the south. Metro Local Bus 204 includes a stop at Exposition Boulevard that accesses the Expo/Vermont Metro Expo Line rail station.

Metro Local Bus 14 runs east-west along Beverly Boulevard from Beverly Hills to the west, with stops at the Beverly Center, Farmer's Market/The Grove and Larchmont Village, to Adams Boulevard and Figueroa Street to the east, with stops at locations in downtown Los Angeles along Grand Avenue and Olive Street.

Street Designations

- | | |
|----------------|--|
| Juanita Avenue | The Mobility Plan 2035 designates Juanita Avenue as a Local Street - Standard with a requiring right-of-way width of 60 feet (30-foot half right-of-way) and a required roadway width of 36 feet (18-foot half roadway and 12-foot sidewalk). Juanita Avenue is currently improved with a 60-foot right-of-way. |
| Madison Avenue | The Mobility Plan 2035 designates Madison Avenue as a Local Street - Standard with a requiring right-of-way width of 60 feet (30-foot half right-of-way) and a required roadway width of 36 feet (18-foot half roadway and 12-foot sidewalk). Madison Avenue is currently improved with a 60-foot right-of-way. |
| Oakwood Avenue | The Mobility Plan 2035 designates Oakwood Avenue as a Local Street - Standard with a requiring right-of-way width of 60 feet (30-foot half right-of-way) and a required roadway width of 36 feet (18-foot half roadway and 12-foot sidewalk). Oakwood Avenue is currently improved with a varying width of 32 – 60 feet. |

ZONING CONFORMANCE

Density

The Development Site is located within the M1-1 Zone and Subarea D of the SNAP. Residential units are not permitted in the M1 Zone unless an existing building is being converted either by way of a conditional use permit process or under the Adaptive Reuse Ordinance. Subarea D allows uses of the CM Zone, except that Projects with hotel, motel, apartment hotel, and residential uses are prohibited.

In order to provide residential uses on the Development Site, the Applicant is requesting a General Plan Amendment, Zone Change and Specific Plan Amendment to create a new Subarea (See Exhibit B for Specific Plan Amendment and Exhibit C Development Standards) that permits unlimited density for a qualified Permanent Supportive Housing Project. The Project proposes the development of 454 dwelling units as part of a Qualified Permanent Supportive Housing Project.

The Project provides five individual buildings. The Southwest Building A would include 74 units, the Southwest Building B would include 62 units, the Northwest Building would include 84 units, the Northeast Building would include 143 units and the Southeast Building would include 90 units. The Project would provide 370 studio units, 71 one-bedroom units and 13 two-bedroom units. These units offer private baths, kitchens and living spaces critical to promoting resident independence.

Table 3. Proposed Density and Unit Type by Building

<u>Building</u>	<u>Northeast</u>	<u>Northwest</u>	<u>Southeast</u>	<u>Southwest A</u>	<u>Southwest B</u>	<u>Total</u>
Studios	111	48	76	73	62	370
One-Bedroom	22	35	14	0	0	71
Two-Bedroom	10	1	0	1	1	13
Total	143	84	90	74	63	454

Affordability

The Applicant is requesting entitlements subject to affordability requirements outlined in Measure JJJ and codified in LAMC Section 11.5.11(a)(1)(iii), which requires no less than 5% of the total units at rents affordable to Extremely Low Income households, and either 11% of the total units at rents affordable to Very Low Income households or 20% of the total units at rents affordable to Lower Income households, inclusive of any Replacement Units. The Project would restrict 5% of the total units at the Extremely Low Income level and 11% of the total units at the Very Low Income level in accordance with California Department of Housing and Community Development (HCD) rent schedules.

To qualify for AB 1197, the Project must provide 100% of the units at Low Income levels in accordance with HCD rent schedules. The Project will satisfy all the affordability requirements by providing the aforementioned 5% of the total units at the Extremely Low Income level, 11% of the total units at the Very Low Income level and the remaining units, exclusive of five managers' units, as Restricted Affordable at the Low Income level.

The Project will also restrict affordable units consistent with the definition of a Qualified Permanent Supportive Housing Project in the proposed Subarea D.2 of the SNAP. Qualified Permanent

Supportive Housing is defined as a project where “where all of the total combined Dwelling Units or Guest Rooms, exclusive of any manager’s units, are affordable. For the purposes of this subdivision, affordable means that rents or housing costs to the occupying residents do not exceed 30 percent of the maximum gross income of Extremely Low, Very Low or Low Income households, as those income ranges are defined by the United States Department of Housing and Urban Development (HUD) or any successor agency, as verified by the Housing & Community Investment Department (HCIDLA). A minimum of 50 percent of the total combined Dwelling Units or Guest Rooms is occupied by the Target Population.”

By providing 5% of the total units at the Extremely Low Income level, 11% of the total units at the Very Low Income level and the remaining units as Low Income at the HCD rent levels, the Project also satisfies the proposed Subarea D.2 affordability requirements.

Additionally, 100% of the total units will be provided for members of the Target Population, who are persons, including persons with disabilities, and families who are homeless, exclusive of the managers’ units.

Table 4. Affordability and Target Population

Program	Requirements	Proposed
Measure JJJ (General Plan Amendment and Zone Change) (LAMC § 11.5.11)	5% Extremely Low and 11% Very Low or 20% Low based on HCD rents	5% Extremely Low, 11% Very Low, 84% Low all based on HCD rents and 5 market rate managers’ units.
AB 1197	100% Low based on HCD rents	
SNAP Subarea D.2	100% Low and 50% target population based on HUD rents	100% set aside for the target population excluding manager’s units

Floor Area

The Development Site is located within the M1-1 Zone, but the Applicant is requesting a Zone Change to the CM-1 Zone. The Height District 1 in the CM zone restricts the site to a Floor Area Ratio of 1.5 to 1, or one and one-half times the Buildable Area of the Development Site. The Applicant also proposes a Specific Plan Amendment to the SNAP to create Subarea D.2 that would permit Qualified Permanent Supportive Housing projects to not exceed a maximum Floor Area Ratio of 3 to 1, or three times the Buildable Area of the Development Site. Buildable Area, as defined by LAMC Section 12.03, is the Lot Area excluding those portions of the lot which must be reserved for yard spaces, building line, setback space that would apply to a one-story building. This means that the Buildable Area is less than the total Lot Area.

The Lot Area of the Development Site is 90,974 square feet, but the Buildable Area of the Development Site is approximately 87,466 square feet. With a 3 to 1 FAR, the maximum permitted floor area is approximately 262,398 square feet. The Project will provide 11,772 square feet of Residential Supportive Service areas consisting of 5,700 square feet of case management services offices with meeting rooms and 6,072 square feet interior common open space areas. This combines to provide 4.7% of the Projects floor area which exceeds the 3% standard.

The proposed Subarea D.2 modifies the definition of Floor Area. Floor Area as defined by LAMC Section 12.03 excludes exterior walls, stairways, shafts, rooms housing building-operating

equipment or machinery, parking areas with associated driveways and ramps, space dedicated to bicycle parking, space for the landing and storage of helicopters, and basement storage areas. Subarea D.2 standards additionally excludes from the overall calculation of Floor Area for Qualified Permanent Supportive Housing projects areas designated exclusively for supportive services uses or public areas accessible to all residents, including those for residential or supportive services uses, indoor open spaces, lobbies, and corridors. Subarea D.2 standards also require that the Floor Area be measured to the center line of wall partitions between public and non-public areas.

The Project provides five individual buildings. The Southwest Building A would include 39,000 square feet, the Southwest Building B would include 34,000 square feet, the Northwest Building would include 49,000 square feet, the Northeast Building would include 78,812 square feet and the Southeast Building would include 47,000 square feet. The Project, after all five buildings are constructed, would create a total of 247,812 square feet of new floor area consistent with the definition of Floor Area outlined in the proposed Subarea D.2 of the SNAP.

Table 4. Proposed Floor Area (SF) by Building

	Northeast	Northwest	Southeast	Southwest A	Southwest B	Total
LAMC 12.03 floor area	102,996	61,766	58,615	52,196	42,170	317,743
Subarea D.2 Deductions						
Supportive Services	1,215	1,000	860	1,350	1,275	5,700
Common Areas	5,994	1,263	4,196	1,202	1,945	14,600
Corridors	14,970	8,478	6,559	9,274	4,278	43,559
Interior Open Spaces	2,005	2,025	-	1,370	672	6,072
Total Deductions	24,184	12,766	11,615	13,196	8,170	69,931
SNAP Subarea D.2 Floor Area	78,812	49,000	47,000	39,000	34,000	247,812

Height

Subarea D.2 would establish unlimited height and story restrictions for Qualified Permanent Supportive Housing Projects. The Project would achieve a maximum building height of 95 feet.

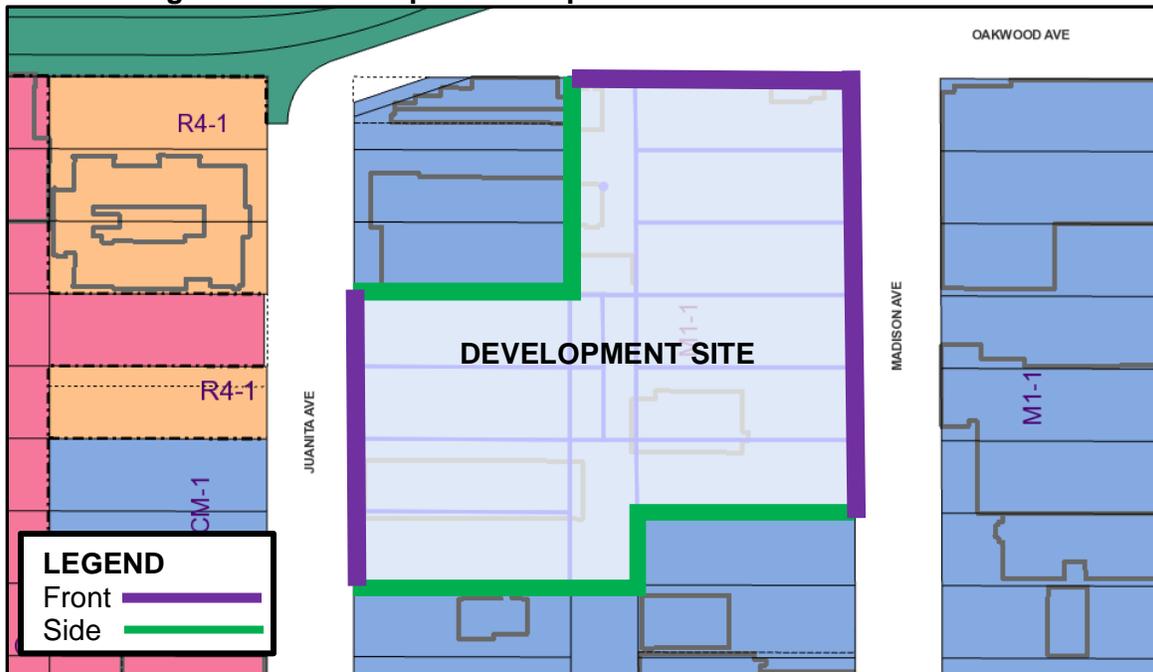
Table 5. Proposed Height by Building

	Northeast	Northwest	Southeast	Southwest A	Southwest B
Height (feet)	92' - 3"	94' - 3"	93' - 7"	94' 6"	95' - 0"
Stories	8	8	8	8	8

Yards and Setbacks

The Development Site has three separate street frontages and several internal property lines. Based on the Department of City Planning discussion with LADBS, all three street frontages are considered front yards and all internal property lines are considered side yards. There are no rear yards as part of the Development Site.

Figure 1. ZIMAS Map of Development Site with Yard Information



Based on the proposed SNAP Subarea D.2, yard provisions would be in accordance with the underlying zone. The Applicant is requesting a Zone Change from M1 to CM so the yard provisions of the CM zone would apply. However, the Applicant is also requesting a Developer Incentive pursuant to LAMC Section 11.5.11(e), which allows Projects that provide affordable housing consistent with LAMC Section 11.5.11 to be entitled to three incentives or concessions. Because the Project will restrict 100% of the total units, exclusive of manager's units, at rent levels consistent with LAMC Section 11.5.11, the Applicant requests to utilize the side yard requirements for the RAS3 zone per LAMC 12.10.5 in lieu of the side yard requirements in the underlying CM zone. The CM zone does not require front yard setbacks and the RAS3 zone requires 5-foot side yards. Thus, the Project is not required to provide a minimum front yard setback on and is required to provide side yard setbacks of at least 5 feet.

The Project includes varying setbacks from all property lines ranging from 0 feet to 37' - 6". Along street frontages, the Northeast Building would have a minimum setback of 0 feet from Oakwood Avenue, the Northeast Building would have a minimum setback of 0 feet from Madison Avenue, the Southeast Building would have a minimum 4' - 1" setback from Madison Avenue, the Northwest Building would have a minimum 17-foot setback from Juanita Avenue and the Southwest Building A would have a minimum 2' - 10" setback from Juanita Avenue. In multiple instances, varying building setbacks along street frontages are determined by the location requirements of the transformer so they are accessible to the public street.

The minimum interior yard setback would be 5' - 1" for a portion of the Southwest Building B between the building and the southwesterly property line. All other interior yard setbacks range from 10' - 2" to 13' - 11".

Open Space

According to the proposed SNAP Subarea D.2, which references LAMC Section 12.21.G, the Project is required to provide a minimum of 100 square feet of open space per unit with less than

3 habitable rooms, 125 square feet of open space per unit with three habitable rooms and 175 square feet of open space per unit with more than three habitable rooms. According to the LAMC definition of habitable rooms, a kitchen is not considered a habitable room for open space purposes.

The 454-unit Project would construct 441 units with less than three habitable rooms and 13 units with three habitable rooms. Thus, the required open space would be 45,725 square feet of open space. However, the Applicant is requesting a Developer Incentive pursuant to LAMC Section 11.5.11(e) for a 20% reduction in overall open space for a total requirement of 36,580 square feet.

The Project would provide the majority of open space in one large landscaped courtyard area throughout the entire Development Site. The Northeast Building would provide additional outdoor open space in a podium deck and a roof deck. Indoor common open space would be provided in community rooms in some buildings. Consistent with the proposed SNAP Subarea D.2 open space requirements, all common open space areas would have a minimum horizontal dimension of 20 feet and an overall minimum dimension of 600 square feet, and they make up less than 40 percent of the required open space. Additionally, 30,945 square feet (86.5%) of open space would be provided on the ground floor level.

Each building would provide sufficient open space for the dwelling units contained within, so each building can stand alone with regard to open space.

Trees are required at the rate of one tree per every four residential dwelling units pursuant to Section 12.21.G. As a result, 114 trees are required and 114 trees would be provided. Additional landscaping provided would equal, at a minimum, 25% of the outdoor common open space or 7,627 square feet.

Table 6. Open Space Provided by Building

	Northeast	Northwest	Southeast	Southwest		Total
				A	B	
<u>Common Indoor</u>						
Level 1						
Community Rooms	2,005	2,025	-	-	672	4,702
Level 2						
Community Room	-	-	-	1,370	-	1,370
Total						6,072
<u>Common Outdoor</u>						
Level 1 Courtyard (throughout)						26,243
Level 2 Podium						
Deck	3,279	-	-	-	-	3,279
Level 8 Deck	986	-	-	-	-	986
Total	4,265					30,508
Total	6,270	2,025	-	1,370	672	36,580

Vehicle Parking and Access

Pursuant to proposed Subarea D.2 of the SNAP, no parking spaces are required for dwelling units or guest rooms restricted to the Target Population of a Qualified Permanent Supportive Housing

Project. The Project would be limited to Target Population members. Thus, no residential parking is required for such units under the proposed Subarea D.2 of the SNAP.

Pursuant to proposed Subarea D.2 of the SNAP, all Qualified Permanent Supportive Housing Projects must provide: One (1) parking space for every 20 dwelling units or guest rooms shall be provided for the purpose of accommodating guests, supportive services, case management and managers' units. Up to 40% of the total required parking spaces may be provided as compact stalls. The Project's 454 dwelling units would result in a parking requirement of 23 spaces for such uses.

Under the State Density Bonus Law (Government Code Section 65915), a local agency cannot enforce any parking requirement on a project that 1) is 100 percent affordable to lower income households, exclusive of managers' units, and 2) provides supportive housing consistent with Health and Safety Code Section 50675.14. (Gov. Code § 56915(p)(4).) All of the Project's units will be affordable to lower income households, and the Project meets the requirements for supportive housing under Health and Safety Code Section 50675.14. Therefore, the Project is not required to provide any parking for its Restricted Affordable units.

Despite being exempt from any parking requirement, the Project would provide a total of 23 parking spaces. The Northeast Building would provide 13 parking spaces with vehicle access via a two-way driveway on Oakwood Avenue. The Southeast Building would provide 5 parking spaces with vehicle access via a two-way driveway on Madison Avenue. The Southwest Building would provide 5 parking spaces with vehicle access via a two-way driveway on Juanita Avenue.

Table 7. Required and Proposed Parking by Building

Required	<u>Northeast</u>	<u>Northwest</u>	<u>Southeast</u>	<u>Southwest A</u>	<u>Southwest B</u>	<u>Total</u>
1 space per 20 units	7	4	5	4	3	23
Proposed	<u>Northeast</u>	<u>Northwest</u>	<u>Southeast</u>	<u>Southwest A</u>	<u>Southwest B</u>	<u>Total</u>
Total	13	0	5	5	0	23

Bicycle Parking

The proposed SNAP Subarea D.2 requires 0.5 bicycle parking spaces per unit, notwithstanding the contrary provisions of Section 12.21 A 16 of the Code and regardless of the underlying zone, for Projects with two or more dwelling units. No bicycle parking shall be required for the non-residential uses in a Qualified Permanent Supportive Housing Project that consist of supportive services, case management offices, computer rooms and other non-residential uses related to providing services to the Target Population since these uses are considered accessory to the residential uses.

With 454 dwelling units, the required bicycle parking for the Project is 227 long-term bicycle parking stalls will be provided on the ground level of each residential building. In addition, pursuant to Development Standards in the proposed SNAP Subarea D.2, the Project would provide one bike rack per 50 feet of street frontage of the Development Site. The Development Site consists of approximately 597.75 feet of linear frontage along Juanita Avenue, Madison Avenue and Oakwood Avenue, so 12 bike racks would be required, which provides 24 short-term bicycle stalls.

HOMELESSNESS AND AFFORDABLE HOUSING

The California Department of Housing and Community Development (HCD) issued a February 2018 report entitled “California’s Housing Future: Challenges and Opportunities, Final Statewide Housing Assessment 2025.” The HCD report observes that challenges to housing affordability include the “existing system of land-use planning and regulation creates barriers to development,” and the “people experiencing homelessness and other vulnerable populations face additional barriers to obtain housing.” The HCD report’s Executive Summary notes the housing challenges facing California include:

- Production averaged less than 80,000 new homes annually over the last 10 years, and ongoing production continues to fall far below the projected need of 180,000 additional homes annually.
- California is home to 12 percent of the homeless population, but a disproportionate 22 percent of the nation’s homeless population.

The Legislative Analyst’s Office, State of California, issued a report on February 21, 2019 to the Senate Budget and Fiscal Review Committee which also noted that California has a disproportionate share of the nation’s homeless population. The report stated that “California has more people experiencing homelessness than any other state in the nation. As of January 2018, California had about 130,000 homeless individuals, which represented about 25 percent of the total homeless population in the nation. (California’s overall population, however, is about 12 percent of the nation.)”¹¹ The Legislative Analyst’s Office report, issued a year later than the HCD report, indicates that California now has one-quarter of the nation’s homeless population, three percent higher than the previous year.

The production of new housing will be further aggravated in Southern California due to the high percentage of projected household growth that is expected in the foreseeable future. Households in the Southern California region (not including San Diego County) are expected to grow by 38% through 2025, representing the largest growth rate compared to the rest of the state.¹² The City of Los Angeles, making up a critical portion of Southern California, is at the forefront of experiencing the adverse impacts of the shortage of housing affordability, which further intensifies the existing and alarming homeless crisis.

The impact of a shortage of affordable housing for the formerly homeless is also illustrated by the severity of the homeless crisis in Los Angeles County. The HCD report notes that most of California’s homeless population resides in major metropolitan areas. One-third of California’s homeless population resides in Los Angeles County.¹³

Mayor Eric Garcetti has issued two Executive Directives that address support for affording housing development and implementation of the Comprehensive Homeless Strategy. Executive Directive No. 13 instructed City the departments that provide development services to streamline the permitting and entitlement process for all housing developments and to create priority processing incentives for housing developments that include targeted levels of affordable units.

¹¹ Legislative Analyst’s Office report, “California’s Housing and Homelessness Challenges in Context,” page 6.

¹² Department of Housing and Community Development report, “California’s Housing Future: Challenges and Opportunities, Final Statewide Housing Assessment 2025,” Figure 1.4, page 8.

¹³ Ibid, Figure 1.6, page10.

The Executive Directive refers to the Mayor's Sustainable City pLAN which sets forth goals of building 100,000 new housing units by 2021 and additional new housing units in subsequent years, leading to 150,000 new housing units by 2025. Executive Directive No. 16 directs the implementation of the City's Comprehensive Homeless Strategy which incorporates national best practices including a coordinated entry system to navigate people from the streets into housing, and a housing-first approach to prioritize placement of the homeless in permanent housing as a primary solution.

The City's Comprehensive Homeless Strategy notes that land use is "an inseparable factor creating additional opportunities to increase housing stock. Los Angeles has not responded to stronger housing demand by allowing for greater residential density in the nearly 500 square miles of our City. Land use and zoning restrictions can and have limited the supply of housing throughout the City."¹⁴ The Comprehensive Homeless Strategy presents data that the City experiences a 9,049 bed deficit for permanent supportive housing for single individuals, which represents the highest need the City is facing relative to the housing gap for the homeless in Los Angeles.

The Comprehensive Homeless Strategy encourages greater density in areas of the City most capable of supporting it, and proposes that the City "should also investigate how well its various zoning density programs are doing to encourage or mandate additional residential development. Further study into reducing or removing parking minimums for affordable and homeless housing profiles, where residents own cars at much lower rates than market-rate housing, could lower the cost of affordable and homeless housing development and ensure efficient use of space for areas where more residential density is needed."¹⁵

In the Land Use chapter of the Comprehensive Homeless Strategy, the root cause of the affordability crisis is identified as the mismatch in the supply and demand for housing, which is observed as a result of the "limited supply of multi-family zoned housing sites and the difficulty of entitling multi-family housing projects throughout the City limits the creation of affordable housing units. A constrained affordable housing supply coupled with high rent burdens increases the likelihood low wage earners will fall into homelessness if their hours are reduced or if they encounter unavoidable/unforeseen costs.....The constrained supply also makes finding affordable replacement housing more difficult and opens the door to homelessness."¹⁶

L.A.'s Green New Deal, the 2019 update to the Mayor's Sustainable City pLAN, sets targets to accomplish the following:

- End street homelessness by 2028.
- Ensure 57% of new housing units are built within 1,500 feet of transit by 2025; and 75% by 2035.
- Increase cumulative new housing unit construction to 150,000 by 2025; and 275,000 units by 2035.
- Create or preserve 50,000 income-restricted affordable housing units by 2035 and increase stability for renters.

L.A.'s Green New Deal's targets include milestones and initiatives. These include the following:

¹⁴ Comprehensive Homeless Strategy, page 17.

¹⁵ Ibid, page 17.

¹⁶ Ibid, page 183.

- Build 10,000 new permanent supportive housing units by implementing Prop HHH and streamlining the permitting process of permanent supportive housing.
- Build 100,000 new housing units by 2021.
- Build 15,000 units of affordable housing by 2021; and 45,000 by 2035.

The Los Angeles Homeless Services Authority (LAHSA) reports in its 2018 Greater Los Angeles Homeless Count that within the City of Los Angeles the homeless population consists of 31,285 persons, of which 22,887 are unsheltered and 8,398 are sheltered. The LAHSA report indicates that there has been a 6% decline in the number of homeless in the City of Los Angeles but the economic factors driving people in homelessness persist. Los Angeles has a growing affordable housing crisis. Los Angeles County needs over 565,000 new affordable housing units for low income renters – 16,000 more than the previous year. LAHSA also reports that more people are falling into homelessness for the first time, with a count of 9,205 new homeless persons in 2018 as opposed to 8,044 homeless persons for the first time in 2017.

In contrast to the 2018 report on the homeless count from LAHSA, on June 4, 2019, Peter Flynn, Executive Director of LAHSA, presented the results of its 2019 Greater Los Angeles Homeless Count to the Los Angeles County Board of Supervisors, noting that within the City of Los Angeles the homeless population consists of 36,300 persons, of which 27,221 are unsheltered and 9,079 are sheltered. The 2019 LAHSA report indicates that there has been a 16% increase in the number of homeless in the City of Los Angeles, thereby reversing the trend of the previous year. The LAHSA report states that 516,946 new affordable housing units are needed in the County, according to the May 2019 “Los Angeles County Annual Affordable Housing Outcomes Report” prepared by the California Housing Partnership Corporation.

California’s high housing costs disproportionately affect extremely low-income and very low-income households. California experiences a 1.5 million shortfall of rental units affordable and available to very low-income and extremely low-income renter households.¹⁷ The Joint Center for Housing Studies of Harvard University reported that Los Angeles is the least affordable housing market in the United States, with the City having the highest burden rate of 47% of households.¹⁸

In adopting Assembly Bill No. 2162 to address California’s homelessness crisis by making it easier to build supportive housing, the State Legislature made findings that twenty-five percent of the nation’s total homeless population and almost half of the nation’s unsheltered population reside in California. The Legislature found that evidence shows “supportive housing – an affordable rental with intensive services promoting housing stability – works to reduce chronic homelessness.” Additionally, AB 2162 notes that studies “reveal supportive housing benefits communities by reducing homelessness locally, addressing blight, and increasing property values. Yet one of the barriers to creating supportive housing has been local delays or denials of applications to build supportive housing, based on subjective local planning standards.”

Assembly Bill No. 2162 requires that supportive housing be a use by right in zones where multi-family and mixed uses are permitted, including non-residential zones permitting multi-family uses, if the proposed development meets specific criteria, and would require a local government to approve a supportive housing development that complies with these requirements. The developer of supportive housing would have to provide the planning agency a plan for providing

¹⁷ Department of Housing and Community Development report, “California’s Housing Future: Challenges and Opportunities, Final Statewide Housing Assessment 2025,” Figure 1.24, page 30.

¹⁸ “The State of the Nation’s Housing 2018,” page 31

supportive services onsite for the residents. The legislation prohibits the imposition of minimum parking requirements for units occupied by supportive housing residents if the development is located within one-half mile of a public transit stop.

The Project would address housing opportunities for formerly homeless individuals by replacing expansive parking lots and small buildings used for storage and telecommunications purposes with five Restricted Affordable housing buildings at the Extremely Low to Low Income level with adequate space in each building for supportive social services for the residents. The supportive services for the residents would include case management, mental health services, independent living skills programs, substance abuse programs, and job training. The provision of supportive social services to homeless persons is a critical element to helping the at-risk population to seek personal betterment, and the Applicant is committed to these supportive service programs and affordable housing to be provided in a high-quality environment.

The Applicant's request for approval of a Zone Change to permit the construction of Restricted Affordable housing for the formerly homeless and supportive social services and approval of a new Subarea in the SNAP to construct the affordable housing project for the formerly homeless would be consistent with the City's Comprehensive Homeless Strategy, the Executive Directives issued by the Mayor, State law as the result of the adoption of AB 2162, and housing reports issued by the State and County.

In developing the Permanent Supportive Housing Ordinance for consideration by the City Planning Commission, Department of City Planning staff prepared a Recommendation Report to the City Planning Commission for its public hearing on December 14, 2017 for Case No. CPC-2017-3136-CA. The Report noted that the Permanent Supportive Housing (PSH) Ordinance was "drafted based on several key strategies provided in the City's Comprehensive Homeless Strategy, as well as through additional study of the common barriers facing the development of PSH in the City of Los Angeles."

Staff observed that as part of the Comprehensive Homeless Strategy and the Measure HHH expenditure plan, the City has "a goal of building 1,000 PSH units per year over the next ten years." In 2017, the need for PSH units was based on the January 2017 Greater Los Angeles Homeless Count which indicated that approximately 34,189 people were experiencing homelessness in the City, a number which grew by 20% since 2016. The homeless count dropped in 2018 to 31,285 but jumped 16% in 2019 to the current number of 36,300 homeless in 2019. The staff report indicates the City has been averaging a production rate of approximately 300 PSH units per year, prior to the adoption of Measure HHH which intended to streamline planning approvals for the 10,000 PSH units that are anticipated to be funded by Measure HHH over the next ten years.

The Recommendation Report observed that PSH has been "widely recognized and prioritized as one of the most effective solutions to ending homelessness. PSH is a type of affordable housing for the formerly or chronically homeless which incorporates supportive services such as mental health treatment, addiction therapy and vocational training. Integrating services with affordable housing provides formerly homeless individuals and families the ongoing help they need to remain housed and able to live independently. PSH has proven successful in providing long-term housing for individuals experiencing homelessness, and has been shown to have high retention rates of 90 percent and above, according to LAHSA and the Conrad N. Hilton Foundation Chronic Homelessness Initiative."

PREVIOUS CASES (on-site)

CPC-2000-1976-SP: Approved on September 25, 2000, the Vermont/Western Transit Oriented District Neighborhood and Specific Plan (SNAP).

CPC-1984-1-HD: Approved on June 25, 1985, Amendments to Height Districts with the Central parts of the City of Los Angeles.

CPC-7001: Approved on April 23, 1956, Zone Change from R4 and C2 on the Project Site to M1.

RELATED CASES (nearby properties)

DIR-2008-4275-SPP-DB. On December 31, 2008, the Director of Planning approved a Specific Plan Project Permit Compliance and a Density Bonus to allow the construction of a 49-unit low-income housing project with a 35% density bonus with a reduction of the required number of parking spaces to one-quarter parking spaces for each dwelling unit and a reduction of open space to 4,030 square feet. The project site is 335-339 N. Juanita Avenue.

CPC-2014-1602-CU-SPE-SPP-DB-SPR. On December 11, 2014, the City Planning Commission approved a Conditional Use Permit to allow density bonus increases for restricted affordable units; a Conditional Use Permit for reduced yards and increased FAR; a Specific Plan Exception to allow an expansion of the homeless shelter in Subarea D of the SNAP; a Specific Plan Project Permit Compliance with the SNAP; two Density Bonus on-menu incentives to reduce open space and to average open space over the project site; and Site Plan Review. The project site is located at 320-342 N. Madison Avenue; 3750-3766 W. Oakwood Avenue; and 333-345 N. Westmoreland Avenue.

CPC-2014-1947-CU-SPPA-SPP-DB-SPR. On February 26, 2015, the City Planning Commission approved a Conditional Use Permit and a Density Bonus with off-menu incentives to permit the construction of 100 residential units in lieu of 53 residential units with additional relief height requirements, loading requirements, stepback requirements and transparent building elements.

**FINDINGS FOR GENERAL PLAN AMENDMENT
PURSUANT TO CITY CHARTER SECTIONS 555, 556 AND 558**

The Applicant requests approval of a General Plan Amendment to revise the land use designation in the Wilshire Community Plan from Limited Industrial (corresponding to the M1 Zone) to Commercial Manufacturing (corresponding to the CM Zone). As part of the discretionary requests for this application, the Applicant is also requesting a Zone Change from the M1-1 Zone to the CM-1 Zone. The findings for the requested Zone Change are addressed in the sections below.

The requested General Plan Amendment from Limited Industrial to Commercial Manufacturing would create a development site compatible the Wilshire Community Plan's recognition of a residential community issue that there is a need to accommodate more affordable housing. The Project Site is located on the edge of M1 zoned properties, where adjoining parcels to the west, across Juanita Avenue, are zoned R4, C2 and CM and developed with residential and commercial uses. Properties in the M1 Zone that adjoin the Project Site are developed with commercial and residential uses, including the PATH Affordable Housing Project located directly across from the Project Site on the east side of Madison Avenue. The immediate vicinity has been transformed over the years from industrial uses to a mix of residential, commercial and industrial uses. On the Project Site's portion of Lot 19, the property was developed in 1924 with three small detached residences. The Project Site is also developed with three small commercial buildings, and surface parking lots. The proposed General Plan Amendment complies with City Charter Sections 556 and 558 in that the requested amendment reflects the land use patterns, trends and uses in the immediate area, which is developed with a mix of residential, commercial and light industrial projects on properties currently zoned for a mix of residential, commercial and industrial uses.

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

The requested General Plan Amendment from Limited Industrial to Commercial Manufacturing would create a 2.09-acre geographic area that is compatible the Wilshire Community Plan's recognition of the dire need to accommodate more affordable housing.

The requested General Plan Amendment covers an 2.09 acre area that has, along with the neighboring properties, a significant social and economic identity. The character of the immediate area is defined by the diversity of uses including a cluster of affordable residential developments. To the east of the site is the 6-story PATH affordable housing development consisting of 122 residential units and supportive services. Across Juanita Avenue to the west is the La Kretz Villas building with 49 residential units consisting of subsidized affordable studio units and an office building. Located north of the site is the Delancey Street Foundation facility, which houses approximately 300 residents. The Foundation provides housing and services to homeless individuals and those at-risk of homelessness. Properties to the south are improved with office buildings, warehouse uses, and the Virgil Middle School campus. The Project will redevelop the underutilized Project Site, currently developed with three residential units along with commercial uses and surface parking, with a new affordable housing development and supportive services, consistent with the trends of the neighborhood. The Project's residential uses will complement the neighborhood-serving commercial uses. Because the Project residents are not expected to own a personal vehicle, it is expected that they will patronize these nearby commercial uses more frequently than traveling to another part of the City. Further, the Project will have synergy with the nearby affordable housing developments, some of which are also targeted to the homeless

population. The supportive services at the Project will complement those provided in the vicinity. Therefore, the requested General Plan Amendment, will support cohesion in this area with a significant social and economic identity.

The requested General Plan Amendment also covers an area that has, along with the neighboring properties, a physical identity as a transit-rich neighborhood within walking distance of the Vermont/Beverly Metro Red Line Rail Station. As discussed in detail in the SCEA prepared for the Project, state law, regional regulations and the City's General Plan and Municipal Code strongly encourage residential development, especially affordable housing, in transit-rich areas like the Project Site. Various incentives are provided to such developments, including but not limited to increased density bonuses, parking reductions and streamlined processes under CEQA, some of which Project is utilizing. Therefore, the requested General Plan Amendment, which covers an area with a significant physical identity as a transit-rich area, will implement state, regional and local goals to place housing within close physical proximity of transit.

The unique development of residential and commercial uses in the immediate neighborhood establishes social, economic, and physical identity appropriate to re-designate the Project Site from Light Industrial to Commercial Manufacturing for the construction of the proposed Project.

Charter Finding 556. When approving any matter listed in Section 558, the City Planning Commission and the Council shall make findings showing that the action is in substantial conformance with the purposes, intent and provisions of the General Plan. If the Council does not adopt the City Planning Commission's findings and recommendations, the Council shall make its own findings.

The amendment would re-designate the Project Site from Light Industrial to Commercial Manufacturing. The amendment of the land use designation, in conjunction with the recommended zone change to CM-1 Zone would allow the redevelopment of the site with a new affordable housing development. The site is located within an area that has been developed and continually utilized with a mixture of residential and commercial uses. The Project Site itself has been used for residential and commercial purposes. The three small detached residential units have been in existence since 1924. As discussed below, and in the Project SCEA under Appendix M (General Plan Consistency Findings) the amendment of the land use designation would be consistent with the purpose, intent and provisions of the General Plan.

Charter Finding 558. The proposed Amendment to the Wilshire Community Plan will be in conformance with public necessity, convenience, general welfare and good zoning practice.

The amendment to the Wilshire Community Plan would re-designate the land use designation of the Project Site from Light Industrial to Commercial Manufacturing. The amendment of the land use designation, in conjunction with the recommended zone change to CM-1 Zone would allow the development of much-needed Restricted Affordable housing units for the formerly homeless by demolishing an underutilized property that is occupied on the majority of its land mass for surface parking, while the existing buildings are either aging small residential buildings or small commercial buildings. The Project would provide a maximum of 454 residential dwelling units, of which 449 units would be Restricted Affordable units at Extremely Low to Low Income levels and 5 would be managers' units. The development would include on-site supportive social services for the residents. The new modern units, which would be deed restricted, would ensure that the permanent supportive housing for homeless persons is maintained well into the future, which is necessary considering that the lack of housing for the homeless remains a persistent problem in

light of the recent 2019 report from LAHSA that the homeless population in the City of Los Angeles has increased 16% since the 2018 homeless count.

Without the amendment, the property would remain underutilized by outmoded buildings that do not generate improved benefits for the homeless community and to the area at large. The immediate area, consisting of existing affordable housing projects and aging commercial properties and limited warehouse uses, is no longer viable for new industrial development. The current land use pattern of the surrounding area consists of a mixture of non-industrial uses including residential development and commercial buildings and lacks the necessary infrastructure and amenities for industrial uses.

The amendment would permit the construction of a residential development which is compatible with its surroundings (including similar housing developments adjacent to the subject property) and consistent with State and City planning goals. The amendment would allow this urban infill site to achieve numerous laudable planning goals, including construction of affordable housing proximate to mass transit and the introduction of supportive services that are much needed by the Extremely Low to Low Income homeless residents.

Public Necessity, Convenience, and General Welfare

The amendment would facilitate a vibrant residential development that would replace aging, outmoded small single-family residences and small commercial buildings. The new development would create a higher density affordable housing project that would be proximate to mass transit options and easily accessible to the commercial corridor of Vermont Avenue. A portion of the surrounding area has emerged as a neighborhood with affordable housing developments that have supportive services. In fact, properties immediately adjacent to the east and the west of the Project Site have been developed with affordable housing for low income and the homeless. Housing for the Extremely Low to Low homeless individuals is a public necessity, and the location of the proposed new affordable housing development provides a convenience for the public and helps to provide for the general welfare of the public.

The Housing Element 2013-2021 affirms in its Executive Summary that the need to accommodate growth results in the need not only for more housing but a “broader array of housing types to meet evolving household types and sizes.” The development of more housing requires a strategy to accommodate residential development in a sustainable way. The Housing Element estimates that the Wilshire Community Plan has the capacity for 51,490 new housing units, which represents the second highest capacity for new residential units of the 35 Community Plan areas. The approval of the requested Zone Change, along with the General Plan Amendment and Specific Plan Amendment, would advance the City towards the goal of providing more housing by permitting the construction of a maximum of 449 Restricted Affordable Dwelling Units for Extremely Low to Low Income homeless persons in an area specifically contemplated by the City to help meet the City’s housing shortage and comply with its RHNA requirement. As the Project Site is located in a Community Plan area that has the capacity for more new housing units than other parts of the City, the Project is consistent with the Housing Element’s stated need to accommodate growth.

According to the Regional Housing Needs Assessment (RHNA), the City is expected to need an additional 82,002 new units through 2021, of which 46,590 units (57%) are designated for very low- and low-income households. The Housing Element notes that the “City will face significant challenges in meeting its RHNA income distribution if it is not able to secure additional funding for affordable housing production and preservation.” The Applicant proposes to construct affordable

housing by proposing a maximum of 449 Restricted Affordable Dwelling Units at the Extremely Low to Low income level and five managers' units, which would assist the City to meet the challenge of the RHNA by maintaining and adding affordable housing units to the housing stock. Considering that the Wilshire Community Plan, as noted above, has the second highest capacity for new housing units of all 35 community plans, the approval of the Zone Change to CM-1 would facilitate the development of much needed housing for Extremely Low to Low Income homeless individuals that is a public necessity which may be fulfilled with the appropriate zoning designation.

The Community Plan further encourages new housing in proximity to transit, goods, services and facilities. In its introductory chapter, the Wilshire Community Plan observed as one of its residential issues that new "development needs to be coordinated with the availability of public infrastructure." Objective 1-2 of the Wilshire Community Plan proposes to "Reduce vehicular trips and congestion by developing new housing in close proximity to regional and community commercial centers, subway stations and existing bus route stops." This objective is supported by Policy 1-2.1 which seeks to "Encourage higher density residential uses near major public transportation centers." The Vermont/Beverly Metro Red Line Rail Station, which is within 500 feet of the Project Site, is the type of public infrastructure improvement that should be easily available to the residents of new residential projects. With a maximum of 454 residential units, the Project proposes a higher density residential use near a major public transportation center. The proposed Project's location near transit options would facilitate the residents' interaction with the community, activating the pedestrian environment and providing more customers to businesses on the commercial corridor of Vermont Avenue. The public convenience and general welfare is enhanced by offering homeless individuals the ability to live in close proximity to transit, job opportunities, various public and private facilities, shopping for necessities and other basic services.

The public necessity, convenience and general welfare are further enhanced by a well-designed campus, with the five buildings arranged to provide common open space areas in courtyards and passageways that serve to improve the quality of life in the neighborhood with improved security and an increased 24-hour population that activates the street. With the development of an attractive residential development consisting of a maximum of 449 Restricted Affordable units for Extremely Low to Low Income homeless individuals and five managers' units, the Project is not only compatible and complementary with the adjacent residential and commercial uses in the immediate vicinity, the Project would fulfill the need to provide clean, sanitary and safe housing for underserved segment of society. The need for this type of housing is greatly underscored by the report of the Los Angeles Homeless Services Authority in its 2019 Greater Los Angeles Homeless Count that the homeless population in the City of Los Angeles increased by 16% over the previous year, which now consists of 36,300 homeless persons, of which 27,221 need shelter.

The proposed CM zoning of the Project Site is consistent with the proposed General Plan land use designation of Commercial Manufacturing and supports higher density residential development within an affordable housing development for Extremely Low to Low Income homeless individuals. The Project is compatible with the Wilshire Community Plan's goals, objectives and policies, as discussed in the findings for the Community Plan. In general, these goals, objectives and policies encourage the development of higher density new housing in proximity to commercial centers and major transportation centers, along with providing more affordable and increased accessibility for the handicapped and senior citizens, many of which are within the Target Population for Permanent Supportive Housing, i.e., homeless individuals. The proposed Project would offer better housing choices for homeless individuals that are often relegated to shelters or transitional housing, or even worse, have no temporary housing options

at all. The proposed Project would also bring new residential units to an area that has a mix of residential, commercial and light industrial uses, but which offers several options to place residents within easy walking distance of several public transit alternatives and a major commercial corridor. The proposed Zone Change to the CM Zone would facilitate the much needed housing for an underserved segment of society, and as a result, the Zone Change would promote the public necessity, convenience and general welfare to accommodate a population that would benefit from housing and supportive services for those in the greatest need.

Good Zoning Practices

The General Plan Framework notes that the City of Los Angeles has “insufficient vacant properties to accommodate forecast population increases. Consequently, the City’s growth will require the reuse and intensification of existing developed properties.” The existing Project Site consists of three, small one-story residential buildings and three, small underutilized one-story commercial buildings. The Project Site also includes a large surface parking areas that should be utilized to accommodate an intensification of the land use in order to construct an affordable housing development.

A basic principle of good zoning practice, and State law as required by California Government Code Section 65860, is consistency between the General Plan land use designation and zoning designations. The General Plan Framework’s Objective 3.1 seeks to accommodate a “diversity of uses that support the needs of the City’s existing and future residents, businesses and visitors.” The Objective is supported by Policy 3.1.6 which proposes to allow for the “adjustment of General Plan Framework Element land use boundaries to account for the changes in the location and introduction of new transit routes and stations...and, in such cases, consider the appropriate type and density of use generally within one-quarter mile of the corridor and station to reflect the principles of the General Plan Framework Element and the Land Use/Transportation Policy.” The Project is located within 500 feet of the Metro Red Line Rail Station located at Vermont Avenue and Beverly Boulevard, and several Metro bus lines, including the Metro Rapid Bus Line 754, that have stops at Vermont Avenue and Beverly Boulevard. Additionally, Vermont Avenue is a commercial center within easy walking distance of the Project. The Project would replace underutilized buildings on a lot that is 2.09 acres in size in order to create a higher density residential use that is near the major transportation center at Vermont Avenue and Beverly Boulevard. The requested General Plan Amendment to Commercial Manufacturing would create a development site compatible with the Wilshire Community Plan’s recognition of a residential community issue that there is a need to accommodate more affordable housing in transit-rich areas.

The Project reflects the existing land use patterns, trends and uses in the immediate area, which is developed with a mix of residential, commercial and light industrial projects on properties currently zoned for a mix of residential, commercial and industrial uses. The Project would create synergy with the existing residential properties for the lower income and homeless that are located to the immediate east and west of the Project Site. This, in turn, creates a vibrant, cohesive neighborhood that is greatly needed in very close proximity to a Metro Rapid Bus stop and the Vermont/Beverly Metro Red Line Rail Station, allowing the residents easy access within walking distance to several transit options. Based on the foregoing, the proposed Zone Change promotes good zoning practices by allowing the affordable housing development that is consistent with a coherent zoning pattern of establishing a CM Zone for parcels that are within close proximity to a commercial center and a major transportation corridor that includes a Metro Rail station and Metro Rapid Bus stop.

The development of a residential project for affordable housing on property with the land use designation of Commercial Manufacturing is supported by the various goals, objectives and policies of the General Plan Framework Element, the Housing Element 2013-2021, the Wilshire Community Plan, the Wilshire Center/Koreatown Redevelopment Project, the Mobility Plan 2035, and the Health and Wellness Element.

General Plan Framework

The General Plan Framework notes that the City of Los Angeles has “insufficient vacant properties to accommodate forecast population increases. Consequently, the City’s growth will require the reuse and intensification of existing developed properties.”¹⁹ The proposed Project would replace three small one-story residential buildings, three small, underutilized one-story buildings used for the commercial operation of a telecommunications company and surface parking lots on M1-1 zoned land in order to develop a 100% Restricted Affordable housing Project consisting of 449 Restricted Affordable Dwelling Units for Extremely Low to Low Income and homeless persons and 5 managers’ units, with supportive social services.

Goal 3A of the General Plan Framework, Chapter 3 (Land Use):

A physically balanced distribution of land that contributes towards and facilitates the:

- *City’s long-term fiscal and economic viability,*
- *Revitalization of economically depressed areas,*
- *Conservation of existing residential neighborhoods,*
- *Equitable distribution of public resources,*
- *Provision of adequate infrastructure and public services,*
- *Reduction of traffic congestion and improvement of air quality,*
- *Enhancement of recreation and open space opportunities,*
- *Assurance of environmental justice and a healthful living environment, and*
- *Achievement of the vision for a more livable city.*

The proposed affordable housing development for Extremely Low to Low Income homeless persons revitalizes a 2.09-acre property that is currently utilized by three small detached residential units, three small one-story commercial buildings, and surface parking lots. The new construction of an affordable residential Project with supportive social services for homeless persons would contribute to the City’s long-term fiscal and economic viability. The Project does not divide any existing neighborhood, and in fact, connects the various residential uses surrounding the Project Site, including the nearby PATH development. In addition to the fact that the homeless residents would be less likely to own personal vehicles, traffic congestion also would be reduced by residents having easy access to multiple transit options, including the Metro Red Line Rail Station at Vermont Avenue and Beverly Boulevard as well as the Metro Rapid Bus Line at same intersection, which are within 500 feet of the Project Site. As a result of numerous transit options in the vicinity, including Metro Local Bus lines, less vehicle miles would be traveled, air quality would be improved and a healthful living environment would be created. Reduced traffic congestion, improved air quality, and a healthful living environment are created by a residential project where residents would have access by public transit to employment centers, retail centers and neighborhood services. A more livable city would be attained by constructing larger well-designed, energy efficient and modern structures in the five buildings that would provide the affordable dwelling units and supportive social services for the residents. Though the surrounding

¹⁹ The Citywide General Plan Framework, page 3-4.

properties are zoned industrial, commercial and residential, the Project's surrounding neighborhood is evolving toward a greater mixture of residential, commercial and industrial uses. Moreover, additional affordable dwelling units are under construction on the adjacent property to the east of Madison Avenue.

Objective 3.1 of the General Plan Framework, Chapter 3 (Land Use): *Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.*

Policy 3.1.6: *Allow for the adjustment of General Plan Framework Element land use boundaries to account for the changes in the location and introduction of new transit routes and stations....and, in such cases, consider the appropriate type and density of use generally within one-quarter mile of the corridor and station to reflect the principles of the General Plan Framework Element and the Land Use/Transportation Policy.*

The Project includes construction of five eight-story Permanent Supportive Housing residential buildings and the necessary support services. This 100 percent affordable residential development, exclusive of manager's units, would provide 449 lower-income dwelling units in Los Angeles, as well as new foot traffic for the existing surrounding commercial community, thus increasing business opportunities and economy of the Wilshire CPA.

The need for affordable housing for the homeless population has been well-established in the Housing Element and the City's Comprehensive Homeless Strategy. The Housing Element's Goal 4 of "Ending and Preventing Homelessness" notes the "vision for Los Angeles is to see every homeless individual and family housed by preventing them from becoming homeless and by rapidly rehousing those who do fall into homelessness. Permanent housing coupled with supportive services is central to combating homelessness."²⁰ The Project would provide permanent housing for the homeless with supportive services, thereby accommodating a diversity of uses that supports the needs of the City's existing and future residents. The Project would be located near major transit routes and stations where it is appropriate to have a development with higher density such as proposed by the Applicant. The Project Site is in close proximity to major transit as it is located within 500 feet of the Vermont/Beverly Metro Red Line rail station and the Metro Rapid Bus 754 stop at Vermont Avenue and Beverly Boulevard.

The City's Comprehensive Homeless Strategy observes that the City has not responded to stronger housing demand by allowing for greater residential density and that land use and zoning restrictions can and have limited supply throughout the City. Housing data indicates a significant shortfall of permanent supportive housing. The Mayor's Executive Directive No. 16 directs the implementation of the City's Comprehensive Homeless Strategy which incorporates national best practices including a coordinated entry system to navigate people from the streets into housing, and a housing-first approach to prioritize placement of the homeless in permanent housing as a primary solution. The Project would provide a higher density residential project of Restricted Affordable units for Extremely low and Low income and homeless persons.

Additionally, the State has enacted numerous laws, like Senate Bill 375, that prioritize the construction of new housing units within transit rich areas. The City has also adopted various incentives for residential projects in transit rich areas. One such program is the Transit Oriented

²⁰ Housing Element 2013-2021, page 6-11.

Communities (TOC) Affordable Housing Incentive Program which recognizes, following the voter approval of Measure JJJ, that housing development within a one-half mile radius of a Major Transit Stop qualifies for a variety of incentives. The TOC Program promotes the inclusion of restricted affordable units so that residential projects would qualify for incentives. Moreover, projects within 750 feet from the intersection of a Metro Rail Station and a Metro Rapid Bus line qualify for Tier 4 incentives. In Policy 3.1.6, the General Plan Framework would allow for adjustment of land use boundaries to account for the changes in the location and introduction of new transit routes and stations, and in such cases consider the appropriate type and density of use generally within one-quarter mile of the station.

Although the Project is not relying on the benefits of the TOC Program, it will provide 454 new residential units within one-half mile of a Major Transit Stop, and therefore the Project supports state and local objectives that connect land use and transportation planning. It is clear the need for homeless and affordable housing as well as density near transit is an urgent need during the current housing and climate crises. The Project satisfies the General Plan frameworks objective to *accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors* by addressing these urgent issues.

Objective 3.2 of the General Plan Framework, Chapter 3 (Land Use): Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.

The Project would develop new residential uses in walking distance to numerous services, retail, commercial, and residential areas.. The Project Site is located in proximity to multiple transit options, including the Metro Red Line Rail Station at Vermont Avenue and Beverly Boulevard, the Metro Rapid Bus Line 754 with a stop at Vermont Avenue and Beverly Boulevard, and two Metro Local Bus Lines that run on Vermont Avenue and Beverly Boulevard. As a result of numerous transit options in the vicinity, less vehicle miles would be traveled, air quality would be improved and a healthful living environment would be created. Moreover, the residents of affordable units for Extremely Low to Low Income and homeless persons are much less likely to own personal vehicles and would avail themselves of the transit options. In addition, the transit options, along with neighborhood-serving uses, are within easy walking distance of the Project Site. The Project would provide Code-required bicycle parking that also facilitates the reduction of vehicular trips and air pollution.

The Project introduces various streetscape improvements to encourage more pedestrian-friendly street edges along Juanita and Madison Avenues. The sidewalk on Madison Avenue adjacent to the Project, will be widened to up to 12 feet wide in most locations. On Juanita Avenue existing 12 foot sidewalks will be retained. Existing sidewalk widths will also be maintained on Oakwood Avenue. Utility poles fronting the property along Madison, Oakwood & Juanita Avenues will be relocated underground creating more continuous sidewalks. Additionally, nine new street trees will be placed along these three street frontages. Fourteen new bike racks will be strategically located along both Juanita & Madison Avenues. These streetscape improvements will aid in all streets adjacent to the Project becoming more pedestrian and bicycle oriented. Thus, this diversity of transit options near the Project Site would facilitate a reduction of vehicular trips, vehicle miles traveled, and air pollution.

Objective 3.4 of the General Plan Framework, Chapter 3 (Land Use): Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing

neighborhoods and related districts.

The Project Site is located in the Transit Oriented District of the Vermont/Western Station Neighborhood Area Plan (SNAP), an ordinance that was created, as noted in its preamble, for “the purpose of making the neighborhood more livable, economically viable, as well as pedestrian and transit friendly in an effort to heal the community of the disruptions of the Nineties, mitigate population growth and achieve maximum benefit from the subway stations as a valuable public asset.” Also recorded in the preamble is that the “Plan is a document that describes the Neighborhood Vision to the year 2020 for more public facilities and services, jobs, housing, transit ridership, growth management and civic involvement.” The Project would meet the vision of the SNAP to make bring new housing to an area that is pedestrian and transit friendly and to make the neighborhood more livable.

By providing permanent housing for the formerly homeless, the Project fulfills the Objective to encourage new multi-family residential development within 500 feet of a primary transit corridor. At the intersection with Beverly Boulevard one block to the west of the Project Site, Vermont Avenue offers several transit options for the residents of the Applicant’s Project. These options include the Vermont/Beverly Metro Red Line rail station, a Metro Rapid Bus and two Metro Local Bus lines. The neighborhood is made more livable as the streets would be activated with more pedestrians having easy access to transit options. The Project Site is located on M1 zoned property where multi-family residential development for homeless individuals has already been established on property immediately to the east, across Madison Avenue. Similar affordable housing development has also occurred on R4 zoned property that adjoins the Project Site across Juanita Avenue to the west. The Project Site is also suitable for higher density given its proximity to several transit options. The proposed Project would offer housing opportunities for Extremely Low to Low Income homeless persons with the greatest need for new housing while providing necessary supportive services to the residents.

Goal 3K: *Transit stations to function as a primary focal point of the City’s development.*

Objective 3.15: *Focus mixed commercial/residential uses, neighborhood-oriented retail, employment opportunities, and civic and quasi-public uses around urban transit stations, while protecting and preserving surrounding low-intensity neighborhoods from the encroachment of incompatible uses.*

Transit stations are defined as the “intent by the General Plan Framework to encourage new development in proximity to rail and bus transportation corridors and stations....the highest development intensities are targeted generally within one quarter mile of the transit stations.....It is intended that a considerable mix of uses be accommodated to provide population support and enhance activity near the stations.”²¹ To make transit stations the focal point of development, the Project would fulfill this goal by replacing three small detached residential buildings, three small underutilized commercial buildings used for the commercial operation of a telecommunications company, and surface parking lots with 454 residential units and a higher density of a resident population that would have easy access to the Vermont/Beverly Metro Red Line Rail Station and the Metro Rapid Bus and Metro Local Bus lines that are located within 500 feet of the site at the intersection of Vermont Avenue and Beverly Boulevard. The Project would not result in an incompatible land use as neighboring residential and industrial parcels have been developed with affordable housing and there would be no encroachment of incompatible uses on low-intensity neighborhoods.

²¹ General Plan Framework, page 3-35.

The definition of “industrial” in the General Plan Framework recognizes that “some existing industrially zoned lands may be inappropriate for new industries and should be converted for other uses.”²² Industrial Land Use Policy 3.14.6 (e) proposes to consider the potential to re-designate marginal industrial lands on the following criteria: “Where the conversion of industrial lands to an alternative use will not create a fragmented pattern of development and reduce the integrity and viability of existing industrial areas.” Several parcels adjoining the Project Site or located within the surrounding neighborhood have been converted or developed with non-industrial uses. These non-industrial uses include an affordable housing project, an auto sales lot, and a pet hospital. The Project would be compatible with the pattern of development in the surrounding neighborhood and consistent with the City’s focus to building higher intensity uses in close proximity to transit stations.

GOAL 4A of the General Plan Framework, Chapter 4 (Housing): *An equitable distribution of housing opportunities by type and cost accessible to all residents of the City.*

Objective 4.1 of the General Plan Framework, Chapter 4 (Housing): *Plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types within each City subregion to meet the projected housing needs by income level of the future population to the year 2010.*

Policy 4.1.1: *Provide sufficient land use and density to accommodate an adequate supply of housing units by type and cost within each City’s subregion to meet the twenty-year projections of housing needs.*

Consistent with Goal 4A of the General Plan Framework’s Housing chapter and the related objectives, the development would be a residential development providing a maximum of 449 Restricted Affordable Dwelling Units for Extremely Low to Low Income homeless individuals and 5 managers’ units. The introduction of the Housing chapter of the General Plan Framework observes that the “City of Los Angeles has insufficient vacant properties to accommodate the cumulative amount of population growth which has been forecasted. The supply of land zoned for residential development is the most constrained in the context of population growth forecasts.”²³ An equitable distribution of housing opportunities by type and cost accessible to all residents of the City would include the need to include affordable housing for Lower Income and homeless persons.

According to the Housing Element (adopted by the City Council on December 3, 2013 and approved by the California Department of Housing and Community Development on April 2, 2014), the population of the City of Los Angeles will grow by over 140,000 persons between 2014 and 2021. The Housing Element acknowledges that there is a need to support the development and preservation of more affordable housing and “to keep pace with the City’s housing needs.” Considering the City is expected to need an additional 82,002 new units through 2021, of which 46,590 units (57%) are designated for very low- and low-income households based on the Regional Housing Needs Assessment (RHNA), the Housing Element notes that the “City will face significant challenges in meeting its RHNA income distribution if it is not able to secure additional funding for affordable housing production and preservation.” The Applicant proposes to build 449 Restricted Affordable Dwelling Units for Extremely Low to Low Income homeless persons and 5 managers’ units, resulting in more units to be added to the City’s housing stock.

²² Ibid, page 3-32.

²³ Ibid, page 4-1.

The Wilshire Community Plan is identified in the Housing Element as having the capacity for 51,490 new housing units, which represents the second highest capacity for new residential units of the 35 Community Plan areas. The proposed CM-1 Zone would allow the development of 449 Restricted Affordable Dwelling Units and 5 managers' units that are much needed in an area in close proximity to transit options, including a Metro Rail Station and a Metro Rapid Bus Line, both of which are within 500 feet of the Project Site. The CM-1 Zone would permit new ground-up construction of the affordable housing units that are otherwise not permitted in the M1 Zone unless an existing building is being converted either by way of a conditional use permit process or under the Adaptive Reuse Ordinance. The existing commercial buildings on the Project Site are small, one-story structures that are not suitable for conversion to residential units, particularly for a project that would serve the homeless population with dwelling units and supportive social services. Likewise, the conversion of the three small detached residential buildings would not serve the homeless population with a sufficient number of dwelling units. The character of the neighborhood has been changing to include many more affordable housing units for low income and homeless persons. The PATH Affordable Housing Project is located adjacent to the Project Site to the east on industrially zoned land, across Madison Avenue, and the La Kretz Villas low-income housing project is adjacent to the Project Site to the west on residentially zoned land, across Juanita Avenue. Additional affordable housing units are currently under construction on M1 zoned land on the east side of Madison Avenue, across from the Project Site, by Path Ventures.

As the Project Site is located in a Community Plan area that is able to accommodate more new housing units than other parts of the City, the Project Site is the appropriate place to accommodate the type of density needed to provide an adequate supply of housing that is contemplated by the General Plan within this subregion of the City to meet the long-range projections of housing needs. The equitable distribution of housing opportunities for low income housing available to the formerly homeless that is proposed by Goal 4A would be accomplished by the approval of the General Plan Amendment to revise the land use designation in the Wilshire Community Plan from Limited Industrial (corresponding to the M1 Zone) to Commercial Manufacturing (corresponding to the CM Zone) to permit the construction of the restricted affordable housing development requested by the Applicant.

Policy 4.1.6: Create incentives and give priorities in permit processing for low- and very-low income housing developments throughout the City.

The requested General Plan Amendment to revise the land use designation in the Wilshire Community Plan from Limited Industrial (corresponding to the M1 Zone) to Commercial Manufacturing (corresponding to the CM Zone) would permit the development of the affordable housing project for Extremely Low to Low Income homeless persons on industrially zoned land. The General Plan Amendment would create the incentive for the location of the Applicant's Project to provide 449 Restricted Affordable Dwelling Units for the type of housing that is contemplated by the General Plan to be situated throughout the City.

The General Plan Amendment to revise the land use designation to Commercial Manufacturing would permit new ground-up construction of the affordable housing units that are otherwise not permitted by the land use designation of Limited Industrial that corresponds to the M1 Zone unless an existing building is being converted either by way of a conditional use permit process or under the Adaptive Reuse Ordinance. The existing commercial buildings on the Project Site are small, one-story structures that are not suitable for conversion to residential units, particularly for a project that would serve the homeless population with dwelling units and supportive social

services. Likewise, the conversion of the three small detached residential buildings would not serve the homeless population with a sufficient number of dwelling units.

The character of the neighborhood has been changing to include many more affordable housing units for Extremely Low to Low Income homeless persons. The PATH Affordable Housing Project is located adjacent to the Project Site to the east, across Madison Avenue and the La Kretz Villas low-income housing project is adjacent to the Project Site to the west, across Juanita Avenue. Additional affordable housing units are currently under construction on M1 zoned land on the east side of Madison Avenue, across from the Project Site. Notwithstanding the adjacent affordable housing developments, the surrounding neighborhood maintains a mix of residential, commercial and industrial uses so that the neighborhood would retain its existing character without any adverse impacts from the proposed Project.

Objective 4.2 of the General Plan Framework, Chapter 4 (Housing): Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.

As previously discussed, the Project's residential units would be provided in close proximity to several mass transit options with easy access to employment centers, retail uses and neighborhood-serving uses throughout the City. The Extremely Low to Low Income homeless persons that would reside in the Project are unlikely to own personal vehicles, and as a result, because of the close proximity to the Vermont/Beverly Metro Red Line Rail Station, the Metro Rapid Bus 754 and two Metro Local Bus lines, the location of the proposed affordable housing project should be encouraged to be developed in this location. The neighborhood is a high activity area with a mix of multi-family residential, commercial and industrial developments that are proximate to the busy commercial corridor of Vermont Avenue. The commercial and industrial properties that are located within the surrounding neighborhood are buffered from lower-density residential neighborhoods. The properties that are designated residential in the immediate vicinity are developed with multi-family residential housing. The Project Site is to the east of Vermont Avenue, where the few residential parcels are zoned R4. To the west of Vermont Avenue, the residential parcels beyond the commercial parcels fronting Vermont Avenue are zoned R3 and R4, and therefore, any lower-density residential neighborhoods are not located in the surrounding neighborhoods so that adequate transitions and buffers are already in place.

L.A.'s Green New Deal, the 2019 update to the Mayor's Sustainable City pLAN, has the vision to "end homelessness, preserve and expand affordable housing, and shorten the distance between new homes and transit." A target of the Sustainable City pLAN is to ensure 57% of new housing units are built within 1,500 feet of transit by 2025; and 75% by 2035. Other targets include increasing the cumulative new housing unit construction to 150,000 by 2025 and to create or preserve 50,000 income-restricted affordable housing units by 2035. Building housing near transit will help Angelenos use public transportation and reduce emissions from vehicle use. These targets are helped to be fulfilled by the 100% affordable housing development that adds 454 units within 500 feet of several transit options, including the Vermont/Beverly Metro Red Line Rail Station, Metro Rapid Bus 754 and two Metro Local Bus lines.

Industrial Land Use & Economic Development Policies

GOAL 3J: Industrial growth that provides job opportunities for the City's residents and maintains

the City's fiscal viability.

Objective 3.14. Provide land and supporting services for the retention of existing and attraction of new industries

Policies	Project Consistency
<p>Policy 3.14.1 Accommodate the development of industrial uses in areas designated as "Industrial-Light," "Industrial-Heavy," and "Industrial-Transit" in accordance with Tables 3-1 and 3-9. The range and intensities of uses permitted in any area shall be determined by the community plans.</p>	<p>The Community Plan designates the Project Site as the Industrial – Light land use category. According to Table 3-1 of the Framework Element, typical uses in the Industrial – Light designation include:</p> <ul style="list-style-type: none"> • Industrial uses with potential for a low level of adverse impacts on surrounding land uses • Increased range of commercial uses that support industrial uses (through zoning amendments) • Possible consideration for other uses where parcels will not support viable industrial uses (determined by community plan) <p>The Project would re-designate the Project Site from Light Industrial (corresponding to the M1 Zone) to Commercial Manufacturing (corresponding to the CM Zone). The CM Zone would permit affordable housing while still allowing development of light industrial uses and a range of commercial uses that are compatible with the surrounding area. The surrounding properties are zoned R4, C2, CM and M1. The adjoining properties to the south are zoned M1-1 and developed with a used-car sales lot and a pest control company. The property across Madison Avenue to the east is improved with the PATH Affordable Housing Project that provides housing and supportive services similar to those in the proposed Project located in the M1-1 zone (CPC-2014-1602-CU-SPE-SPP-DB-SPR). Across Juanita Avenue to the west is improved with the La Kretz Villas, a 49-unit residential building that combines subsidized and affordable studio units for individuals who have experienced homelessness and/or disabilities located in the R4-1 zone. Another property across Juanita Avenue to the west is an office building on a parcel zoned C2-1. Other nearby buildings in the vicinity along Beverly Boulevard include auto repair shops and an animal hospital located on parcels zoned M1-1.</p> <p>A map was prepared to identify the current land uses of the surrounding area within a 500-foot</p>

	<p>radius of the Project Site (“Study Area”). The land uses are based on the available building permits and Certificates of Occupancy from the Los Angeles Department of Building and Safety (“LADBS”) archives. The Study Area is approximately 1.2 million square feet, or 28 acres, and consist of parcels generally bounded by Virgil Avenue to the east, the US-101 Freeway to the north, Vermont Avenue to the west, and Council Street and Cosmopolitan Street to the south.</p> <p>As evident by the Land Use Map, attached as Exhibit D, the surrounding area within 500 feet of the Project Site is comprised of a mix of residential uses (30%), office uses (14%), and commercial retail uses (13%). The remaining land uses include vacant lots and buildings (14%), the Virgil Middle School campus (9%), mixed-use with residential units (2%), mixed-uses with commercial uses²⁴ (5%), warehouse uses (5%), automotive uses (6%), and the Metro transit station entrance (2%). The current snapshot of the immediate area indicates a land use pattern for mixed-use and transit-oriented development. The Project Site is located within one block of the Metro Red Line transit station at Vermont Avenue and Beverly Boulevard. It also demonstrates that while traditional manufacturing uses have left the area, they have been replaced by other job creating uses.</p> <p>The immediate vicinity does not contain any industrial infrastructure or uses other than access to US-101 (The Hollywood Freeway). Moreover, the existing improvements on the site are obsolete, and the size of the space is not in demand in the market. Indeed, the market for industrial uses in the area is limited; currently, there are only two industrial properties listed as available for rent less than three miles from the site. Both of those properties are significantly larger than the Project Site and are likely to receive higher rents than the Project Site.</p> <p>Overall, new industrial development in the Los Angeles market is infeasible where land costs are greater than approximately \$101 per sq. ft. The current asking price of \$21.72 per sq. ft. per year is below replacement costs for new construction and would therefore not be feasible as a reuse. Moreover, the project site has minimal features that</p>
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²⁴ This land use type includes a combination of office and warehouse uses.

	<p>would support industrial use, is not located in an active industrial district, and is surrounded by incompatible land uses. Current market conditions effectively foreclose the possibility of redeveloping the project site for industrial use. (See Exhibit E - Industrial Feasibility Memo dated April 15, 2020 prepared by MR+E)</p> <p>The Project is consistent with the City's desire to encourage the residential uses near transit as demonstrated by its inclusion in the CM Zones permitted uses. The proposed General Plan Amendment would be consistent and compatible with the current pattern of development in the surrounding area and would allow for the proposed construction of a new Permanent Supporting Housing development consisting of 454 residential units with approximately 11,772 square feet of supportive services as well as job creating commercial manufacturing uses.</p> <p>Thus, the Project would not accommodate industrial uses on the Property. However, the Project converts marginal industrial land, utilized most recently as surface parking and vehicle repair, to other uses as contemplated by the Industrial Light policy to give "consideration to other uses where parcels will not support viable industrial uses."</p>
<p>Policy 3.14.2 Provide flexible zoning to facilitate the clustering of industries and supporting uses, thereby establishing viable "themed" sectors (e.g., movie/television/media production, set design, reproductions, etc.).</p>	<p>The Project will not impede the City's effort to rezone or redesignate land to create clusters of industries. As described above, the proposed CM zoning allows light industrial and commercial uses, along with residential uses. This zoning will provide flexibility for a wide range of uses, including industrial uses. Thus, the Project would not hinder the City's efforts to establish themed sectors.</p>
<p>Policy 3.14.3 Promote the re-use of industrial corridors for small scale incubator industries.</p>	<p>The Project would not hinder the City's effort to re-use industrial corridors for small scale incubator industries. As described above, the proposed CM zoning allows light industrial and commercial uses. The Project does not involve a small scale incubator industry, but it does promote the reintegration of current homeless individuals into the economy.</p>
<p>Policy 3.14.4 Limit the introduction of new commercial and other non-industrial uses in existing commercial manufacturing zones to uses which support the primary industrial function of the location in which they are located.</p>	<p>As evident by the Land Use Map, the surrounding area within 500 feet of the Project Site is comprised of a mix of uses including residential uses (30%), office uses (14%), and commercial retail uses (13%). The remaining land uses include vacant lots and buildings (14%), the Virgil Middle School campus (9%), mixed-use with residential units</p>

	<p>(2%), mixed-uses with commercial uses²⁵ (5%), warehouse uses (5%), automotive uses (6%), and the Metro transit station entrance (2%). Therefore, industrial uses are not the primary function of the surrounding uses. The Project Site is located across the street from a newly constructed affordable housing project that provides housing and supportive services similar to those in the proposed Project. The current snapshot of the land uses today depict an area that is viable for mixed-use and transit-oriented development. The development of the Project is a continuation of this land use pattern.</p>
<p>Policy 3.14.5 Promote the development of a mix of commercial and light industrial uses in areas designated as Industrial-Transit.</p>	<p>This area is not designated as Industrial-Transit. Therefore, Policy 3.14.5 does not apply to the Project.</p>
<p>Policy 3.14.6 Consider the potential re-designation of marginal industrial lands for alternative uses by amending the community plans based on the following criteria:</p> <p>a. Where it can be demonstrated that the existing parcelization precludes effective use for industrial or supporting functions and where there is no available method to assemble parcels into a unified site that will support viable industrial development;</p> <p>b. Where the size and/or the configuration of assembled parcels are insufficient to accommodate viable industrial development;</p> <p>c. Where the size, use, and/or configuration of the industrial parcels adversely impact adjacent residential neighborhoods;</p> <p>d. Where available infrastructure is inadequate and improvements are economically infeasible to support the needs of industrial uses;</p> <p>e. Where the conversion of industrial lands to an alternative use will not create a fragmented pattern of development and reduce the integrity and viability of existing industrial areas;</p>	<p>The Policy recognizes that while parcels may be designated for industrial land uses, the size, configuration, or availability of infrastructure and improvements may not be adequate to serve the needs of industrial uses. Therefore, it would be appropriate to consider the re-designation of the Project's parcels to be compatible with the existing zone and uses of the surrounding area.</p> <p>The irregularly-shaped Project Site is approximately 90,974 square feet, or roughly 2 acres, and encompasses the majority of the city block bounded by Beverly Boulevard to the south, Madison Avenue to the east, Oakwood Avenue to the north and Juanita Avenue to the west. Other uses within the city block includes an automobile service shop, office buildings, and a car rental business.</p> <p>As indicated by the large areas colored in yellow on the Land Use Map, residential uses make up the largest share of land uses and consist of 30% of the Study Area. There are several multifamily residential buildings across the street from the site including the 6-story PATH affordable housing development consisting of 122 residential units and supportive services. Across Juanita Avenue to the west is improved with the La Kretz Villas, a 49-unit residential building that includes subsidized and affordable studio units. Located north of the site is the Delancey Street Foundation facility, which houses approximately 300 residents. Other residential uses range from one-story single-family</p>

²⁵ This land use type includes a combination of office and warehouse uses.

<p>f. Where the conversion of industrial lands to an alternative use will not result in an adverse impact on adjacent residential neighborhoods, commercial districts, or other land uses;</p> <p>g. Where it can be demonstrated that the reduction of industrial lands will not adversely impact the City's ability to accommodate sufficient industrial uses to provide jobs for the City's residents or incur adverse fiscal impacts; and/or</p> <p>h. Where existing industrial uses constitute a hazard to adjacent residential or natural areas.</p>	<p>dwelling to two-story apartment buildings and are generally located on the eastern edge of the Study Area between Westmoreland Avenue and Virgil Avenue.</p> <p>The second most common land use is commercial office, which consist of 14% of the Study Area. The other primary uses are vacant lots/buildings and commercial retail uses covering 14% and 13% of the Study Area, respectively. Notably, 9% of the Study Area is the Virgil Middle School campus and recreation area.</p> <p>As evident by the Land Use Map, the surrounding neighborhood does not include any traditional manufacturing uses, which is a common use associated with industrial land that generates a substantial amount of jobs. A small fraction of the Study Area is dedicated to automotive uses (6%) and warehouse uses (5%). Industrial uses, particularly manufacturing facilities, are not significant in the current land use pattern. As such, the re-designation of the Project's parcels will not adversely impact or impede the City's ability to accommodate sufficient industrial uses to provide jobs. Jobs are being created with in the office, retail, automotive and warehouse uses which will continue in the area. The supportive services with the Project will promote the reintegration of currently homeless individuals into the job market.</p> <p>The immediate vicinity does not contain any industrial infrastructure or uses other than access to US-101 (The Hollywood Freeway). Moreover, the existing improvements on the site are obsolete, and the size of the space is not in demand in the market. Indeed, the market for industrial uses in the area is limited; currently, there are only two industrial properties listed as available for rent less than three miles from the site. Both of those properties are significantly larger than the Project Site and are likely to receive higher rents than the Project Site.</p> <p>Overall, new industrial development in the Los Angeles market is infeasible where land costs are greater than approximately \$101 per sq. ft. The current asking price of \$21.72 per sq. ft. per year is below replacement costs for new construction and would therefore not be feasible as a reuse. Moreover, the project site has minimal features that</p>
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	<p>would support industrial use, is not located in an active industrial district, and is surrounded by incompatible land uses. Current market conditions effectively foreclose the possibility of redeveloping the project site for industrial use. (See Memo dated April 15, 2020 prepared by MR+E.)</p> <p>The current snapshot of the land uses today depict an area that is viable for mixed-use and transit-oriented development that provide urgently needed housing, jobs and tax revenue. Located within 500 feet of the site is Metro's Vermont/Beverly Red Line transit station. With the appropriate zoning, the Project Site would qualify for Tier 4 level of development bonuses under the City's local Transit Oriented Communities ("TOC") affordable housing incentive program. The TOC program aims to promote high-density residential development around major transit stops. A Tier 4 site, which is the highest tier designation, would permit up to an 80% density increase in exchange for a certain percentage of on-site affordable units.</p> <p>Development of the Project would reinforce the current trend of residential and commercial development and would not result in a fragmented pattern of development while still maintaining an active tax base for the City.</p>
<p>Policy 3.14.7 Consider the potential redesignation of non-industrial properties located adjacent to lands designated and developed with industrial uses for industrial purposes by amending the community plans or by conditional use permits based on the following criteria:</p> <p>a. The redesignation is required to accommodate the expansion of existing industrial uses to facilitate their retention in areas in which they are located;</p> <p>b. There is substantial support of the property owners of the parcels to be redesignated;</p> <p>c. There is no significant disruption or intrusion into existing residential neighborhoods, commercial districts, or other land uses;</p>	<p>The Project does not involve re-designation of non-industrial properties for industrial purposes. As such, Policy 3.14.7 is not applicable to the Project.</p>

<p>d. There are no adverse environmental impacts (traffic, noise, lighting, air pollution, other) on adjacent land uses due to the industrial uses; and</p> <p>e. There is adequate infrastructure to support the expanded industrial use(s).</p>	
<p>Policy 3.14.8 Encourage the development in areas designated as "Industrial-Heavy" of critical public facilities that are necessary to support the needs of residents and businesses but normally are incompatible with residential neighborhoods and commercial districts, such as corporate yards.</p>	<p>This area is not designated as Industrial-Heavy. Therefore, Policy 3.14.8 does not apply to the Project.</p>
<p>Policy 3.14.9 Initiate programs for lot consolidation and implement improvements to assist in the retention/expansion of existing and attraction of new industrial uses, where feasible.</p>	<p>The Project will not impede the City's efforts to initiate programs for lot consolidation and implement improvements to assist in the retention/expansion of existing and attraction of new industrial uses.</p>

GOAL 7B: *A City with land appropriately and sufficiently designated to sustain a robust commercial and industrial base.*

Objective 7.2: *Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.*

Policies

Policies	Project Consistency
<p>Policy 7.2.8. Retain the current manufacturing and industrial land use designations, consistent with other Framework Element policies, to provide adequate quantities of land for emerging industrial sectors.</p>	<p>The Project would change the existing designation to CM. This policy must be considered in light of Policy 3.14.6 and a balancing of policies. As discussed therein, the Project would meet the criteria to change the land use designation to accommodate for affordable housing units.</p>
<p>Policy 7.2.9. Limit the redesignation of existing industrial land to other land uses except in cases where such redesignation serves to mitigate existing land use conflicts, and where it meets the criteria spelled out in Policy 3.14.6 of Chapter 3: <i>Land Use</i>.</p>	<p>This policy must be considered in light of Policy 3.14.6. As discussed therein, the Project would meet the criteria to change the land use designation to accommodate for affordable housing units.</p>
<p>Policy 7.2.10. Ensure that the City's industrial sites are regionally competitive to maintain and enhance a core manufacturing base.</p>	<p>The immediate vicinity does not contain any industrial infrastructure or uses other than access to US-101 (The Hollywood Freeway). Moreover, the existing improvements on the site are obsolete, and the size of the space is not in demand in the market. Indeed, the</p>

	<p>market for industrial uses in the area is limited; currently, there are only two industrial properties listed as available for rent less than three miles from the site. Both of those properties are significantly larger than the Project Site and are likely to receive higher rents than the Project Site.</p> <p>Overall, new industrial development in the Los Angeles market is infeasible where land costs are greater than approximately \$101 per sq. ft. The current asking price of \$21.72 per sq. ft. per year is below replacement costs for new construction and would therefore not be feasible as a reuse. Moreover, the project site has minimal features that would support industrial use, is not located in an active industrial district, and is surrounded by incompatible land uses. Current market conditions effectively foreclose the possibility of redeveloping the project site for industrial use. (See Memo dated April 15, 2020 prepared by MR+E.)</p> <p>The Project will not impede the City's efforts to ensure that industrial sites are regionally competitive to maintain and enhance a core manufacturing base. However, those efforts need to be focused on areas with larger sites which can accommodate manufacturing uses.</p>
<p>Policy 7.2.11. Ensure that the City has sufficient quantities of land suitable to accommodate existing, new and relocating industrial firms, whose operations are appropriate to a specific location in Los Angeles.</p>	<p>The Project will not impede the City's efforts to ensure sufficient quantities of land suitable to accommodate existing, new and relocating industrial firms, whose operations are appropriate to a specific location in Los Angeles.</p>
<p>Policy 7.2.12. Establish, as shown in Figure 7-1, the area adjacent to the Port of Los Angeles, the rail corridor bisecting the San Fernando Valley, and the South Central/Southeast industrial area as market-linked targeted industrial areas (market-linked areas are described on page 7-4).</p>	<p>The Project is not located adjacent to the Port of Los Angeles, the rail corridor bisecting the San Fernando Valley or the South Central/Southeast industrial area. Therefore, Policy 7.2.12 does not apply to the Project. .</p>
<p>Policy 7.2.13. Facilitate environmentally sound operations and expansion of the Port of Los Angeles and the Los Angeles International Airport as major drivers of the local and regional economy.</p>	<p>The Project Site is not located at the Port of Los Angeles or the Los Angeles Airport. Therefore, Policy 7.2.13 does not apply to the Project.</p>
<p>Policy 7.2.14. Take steps to assure that new industries developed are sensitive to environmental and conservation issues, and that cumulative environmental impacts are addressed.</p>	<p>The Project is not introducing new industries to the area. Therefore, Policy 7.2.14 does not apply to the Project.</p>

GOAL 7C: A City with thriving and expanding businesses.

Objective 7.3. Maintain and enhance the existing businesses in the City.

Policies	Project Consistency
Policy 7.3.4. Recognize the crucial role that the Port of Los Angeles and the Los Angeles International Airport play in future employment growth by supporting planned Port and Airport expansion and modernization that mitigates its negative impacts.	The Project Site is not located at the Port of Los Angeles or the Los Angeles Airport. Therefore, Policy 7.3.4 does not apply to the Project.
Policy 7.3.5. Improve the movement of goods and workers to industrial areas.	The Project does not involve the movement of goods and workers. Therefore, Policy 7.3.5 does not apply to the Project.
Policy 7.3.6. Retain the City's existing manufacturing base through an outreach program to existing businesses and an ongoing assessment of their specific land use requirements.	The Project Site does not have a manufacturing facility and is currently vacant. The majority of the site's land mass is dedicated to surface parking while the existing buildings are aging and include three small residences and three small one-story buildings used to service vehicles. The Project will not impede the City's efforts to retain existing manufacturing base.
Policy 7.3.7. Prioritize the retention and renewal of existing industrial businesses.	The majority of the site's land mass is dedicated to surface parking while the existing buildings are aging and include three small residences and three small one-story buildings used for the commercial operation of a telecommunications company which have abandoned the site.
Policy 7.3.8. Assist existing industries located in Los Angeles with their expansion plans and/or relocation efforts to find suitable industrial sites in the City.	The Project will not impede the City's efforts to expand or relocate existing industries to suitable industrial sites.

The Project would help to foster the development of a transitional neighborhood and outdated telecommunications infrastructure to construct 454 permanent supportive housing units. Although the Project is not wholly consistent with all policies listed above related to industrial land uses, a project does not need to be in perfect conformity with each and every policy or objective of a General Plan for a finding of consistency.

The Project is consistent with the majority of applicable policies and objectives transit oriented development and provision of a variety of housing types and styles. The Project will bring supportive housing units and services to an area that is largely characterized by residential and commercial uses and which lacks infrastructure for industrial uses. The Project Site is also well-served by transit and ideal for a more active, pedestrian oriented development. Additionally, the Project would meet or exceed several other relevant policies related to residential uses, mass

transit, and affordable housing.

Housing Element 2013-2021

The Project is harmonious with the following goals, objectives and policies of the Housing Element 2013-2021 of the General Plan:

The proposed residential Project would be consistent with the goals, objectives and policies of the General Plan Housing Element 2013-2021 to provide for affordable housing needs of the City's growing population.

The Housing Element 2013-2021 affirms in its Executive Summary that the need to accommodate growth results is the need not only for more housing but a "broader array of housing types to meet evolving household types and sizes." The development of more housing requires a strategy to accommodate residential development in a sustainable way.

The Wilshire Community Plan is identified in the Housing Element as having the capacity for 51,490 new housing units,²⁶ which represents the second highest capacity for new residential units of the 35 Community Plan areas. The approval of the requested Zone Change would advance the City towards the goal of providing more diverse housing by permitting the construction of a maximum of 449 Restricted Affordable Dwelling Units for Extremely Low to Low Income homeless persons and five market rate managers' units in an area specifically contemplated by the City to help meet the City's housing shortage and comply with its RHNA requirement. A General Plan Amendment from Limited Industrial to Commercial Manufacturing land use designation corresponding to the CM Zone would permit the construction of affordable housing where it is needed and compatible with the surrounding neighborhood. As the Project Site is located in a Community Plan area that has the capacity for more new housing units than other parts of the City, the Project is consistent with the Housing Element's stated need to accommodate growth.

The Project would be developed in a transit-rich area near a commercial corridor with a sustainable infill development appropriate to an area where the Project would be strategically located in proximity to transit and basic amenities. While the Project itself is not a mixed-use development, onsite supportive services will be included as part of the Project, providing opportunities for the residents with job training programs and other services. The Project is also in close proximity to Vermont Avenue, an established commercial corridor. The Project's intent for a smart, sustainable development is encouraged by the General Plan Housing Element's conclusion:

The City's General Plan lays out the strategy to meet this challenge, by directing growth to transit-rich and job-rich centers and supporting the growth with smart, sustainable infill development and infrastructure investments. By integrating the City's housing strategy with its growth strategy the City supports economic development, reduces housing costs, minimizes environmental impacts and enhances the quality of life. At the core of this strategy are complete mixed-use, mixed-income neighborhoods strategically located across the City that provide opportunities for housing, jobs, transit and basic amenities for all segments of the population. (Housing Element 2013-2014, Executive Summary, Page

²⁶ Housing Element 2013-2014, Table 3.1 Summary of Sites with Housing Capacity by Community Plan Area, page 3-4.

c-xiii.)

The Project would provide much needed housing for Extremely Low to Low Income homeless individuals in an area where easy access to many transit options would provide opportunities for disadvantaged persons to enhance their quality of life by having the ability to access employment centers and neighborhood-serving services and retail uses. Considering the City is expected to need an additional 82,002 new units through 2021, of which 46,590 units (57%) are designated for very low- and low-income households based on the Regional Housing Needs Assessment (RHNA), the Housing Element notes that the “City will face significant challenges in meeting its RHNA income distribution if it is not able to secure additional funding for affordable housing production and preservation.” The Applicant proposes to construct affordable housing by proposing a maximum of 449 Restricted Affordable Dwelling Units at the Extremely Low to Low Income level and five managers’ units, which would assist the City to meet the challenge of the RHNA by maintaining and adding affordable housing units to the housing stock.

Goal 1: *A City where housing production and preservation result in an adequate supply of ownership and rental housing that is safe, healthy and affordable to people of all income levels, races, ages, and suitable for their various needs*

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

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

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

Policy 1.1.7: *Strengthen the capacity of the development community to develop affordable housing.*

The Housing Element notes that the “City of Los Angeles is committed to providing affordable housing and amenity-rich, sustainable neighborhoods for its residents, answering the variety of housing needs of its growing population.” The Housing Element recognizes that City households comprise a diverse set of needs that can only be met by providing a wide variety of housing types. The proposed Project would provide affordable housing and supportive social services in furtherance of the foregoing goal, objective and policies at a site which is currently underutilized with surface parking lots, three small one-story commercial buildings, and three small single-family buildings that would be demolished in order to develop a maximum of 454 dwelling units.

The Applicant proposes an affordable housing development in a campus setting where the new construction of five buildings with 454 dwelling units and containing supportive social services would create an environment that is safe, healthy and affordable to persons at the Extremely Low to Low Income level. The Project would provide the safe and healthy housing for a population that often lacks any housing options whatsoever, having to rely on shelters, if space is available, or resorting to street encampments that are neither safe nor healthy. By providing onsite services such as case management, mental health services, independent living skills programs, substance abuse programs, and job training, the Project provides for the various needs of the formerly homeless, an income group with the greatest need for affordable housing and the various services. The provision of the supportive social services is a critical element to helping the at-risk population to seek personal betterment, and the Applicant is committed to these supportive

service programs and affordable housing to be provided in a high-quality environment.

Consistent with Policy 1.1.2, the Project expands the availability of affordable rental housing with its 449 Restricted Affordable dwelling units for persons that need assistance. The requested General Plan Amendment from Limited Industrial to Commercial Manufacturing land use designation corresponding to the CM Zone would provide the Applicant the opportunity to develop the affordable housing in a location that is in close proximity to several transit options and neighborhood-serving uses.

The City's Comprehensive Homeless Strategy notes that land use is "an inseparable factor creating additional opportunities to increase housing stock. Los Angeles has not responded to stronger housing demand by allowing for greater residential density in the nearly 500 square miles of our City. Land use and zoning restrictions can and have limited the supply of housing throughout the City."²⁷ The Comprehensive Homeless Strategy presents data that the City experiences a 9,049 bed deficit for permanent supportive housing for single individuals, which represents the highest need the City is facing relative to the housing gap for the homeless in Los Angeles.

The Comprehensive Homeless Strategy encourages greater density in areas of the City most capable of supporting it, and proposes that the City "should also investigate how well its various zoning density programs are doing to encourage or mandate additional residential development. Further study into reducing or removing parking minimums for affordable and homeless housing profiles, where residents own cars at much lower rates than market-rate housing, could lower the cost of affordable and homeless housing development and ensure efficient use of space for areas where more residential density is needed."²⁸

In the Land Use chapter of the Comprehensive Homeless Strategy, the root cause of the affordability crisis is identified as the mismatch in the supply and demand for housing, which is observed as a result of the "limited supply of multi-family zoned housing sites and the difficulty of entitling multi-family housing projects throughout the City limits the creation of affordable housing units. A constrained affordable housing supply coupled with high rent burdens increases the likelihood low wage earners will fall into homelessness if their hours are reduced or if they encounter unavoidable/unforeseen costs.....The constrained supply also makes finding affordable replacement housing more difficult and opens the door to homelessness."²⁹

L.A.'s Green New Deal, the 2019 update to the Mayor's Sustainable City pLAn, sets targets to accomplish the following:

- End street homelessness by 2028.
- Ensure 57% of new housing units are built within 1,500 feet of transit by 2025; and 75% by 2035.
- Increase cumulative new housing unit construction to 150,000 by 2025; and 275,000 units by 2035.
- Create or preserve 50,000 income-restricted affordable housing units by 2035 and increase stability for renters.

L.A.'s Green New Deal's targets include milestones and initiatives. These include the following:

²⁷ Comprehensive Homeless Strategy, page 17.

²⁸ Ibid, page 17.

²⁹ Ibid, page 183.

- Build 10,000 new permanent supportive housing units by implementing Prop HHH and streamlining the permitting process of permanent supportive housing.
- Build 100,000 new housing units by 2021.
- Build 15,000 units of affordable housing by 2021; and 45,000 by 2035.

In adopting Assembly Bill No. 2162 to address California’s homelessness crisis by making it easier to build supportive housing, the State Legislature made findings that twenty-five percent of the nation’s total homeless population and almost half of the nation’s unsheltered population reside in California. The Legislature found that evidence shows “supportive housing – an affordable rental with intensive services promoting housing stability – works to reduce chronic homelessness.” Additionally, AB 2162 notes that studies “reveal supportive housing benefits communities by reducing homelessness locally, addressing blight, and increasing property values. Yet one of the barriers to creating supportive housing has been local delays or denials of applications to build supportive housing, based on subjective local planning standards.”

The Los Angeles Homeless Services Authority (LAHSA) reports in its 2018 Greater Los Angeles Homeless Count that within the City of Los Angeles the homeless population consists of 31,285 persons, of which 22,887 are unsheltered and 8,398 are sheltered. The LAHSA report indicates that there has been a 6% decline in the number of homeless in the City of Los Angeles but the economic factors driving people in homelessness persist. Los Angeles has a growing affordable housing crisis. Los Angeles County needs over 565,000 new affordable housing units for low income renters – 16,000 more than the previous year. LAHSA also reports that more people are falling into homelessness for the first time, with a count of 9,205 new homeless persons in 2018 as opposed to 8,044 homeless persons for the first time in 2017.

In contrast to the 2018 report on the homeless count from LAHSA, on June 4, 2019, Peter Flynn, Executive Director of LAHSA, presented the results of its 2019 Greater Los Angeles Homeless Count to the Los Angeles County Board of Supervisors, noting that within the City of Los Angeles the homeless population consists of 36,300 persons, of which 27,221 are unsheltered and 9,079 are sheltered. The 2019 LAHSA report indicates that there has been a 16% increase in the number of homeless in the City of Los Angeles, thereby reversing the trend of the previous year. The LAHSA report states that 516,946 new affordable housing units are needed in the County, according to the May 2019 “Los Angeles County Annual Affordable Housing Outcomes Report” prepared by the California Housing Partnership Corporation.

The Applicant’s request for approval of a General Plan Amendment to the Commercial Manufacturing land use designation to permit the construction of restricted affordable housing for the formerly homeless and supportive social services and approval of a new Subarea D.2 in the Vermont/Western Station Neighborhood Area Plan (SNAP) to construct the affordable housing project for the formerly homeless would be consistent with Goal 1 of the Housing Element, the City’s Comprehensive Homeless Strategy, L.A.’s Green New Deal, State law as the result of the adoption of AB 2162, and housing reports issued by the State and County that are addressed elsewhere in this application.

Goal 2: *A City in which housing helps to create safe, livable and sustainable neighborhoods.*

Objective 2.2: *Promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services and transit.*

Policy 2.2.2: *Provide incentives and flexibility to generate new multi-family*

housing near transit and centers, in accordance with the General Plan Framework element, as reflected in Map ES.1.

The Project's development of affordable housing for formerly homeless persons in a campus setting with the new construction of five buildings with 454 dwelling units affordable to Extremely Low to Low Income individuals, and containing supportive social services would create a safe, livable and sustainable neighborhood. The Project would create synergy with the adjacent similar residential developments that are also safe and livable for formerly homeless residents. The Project supports sustainability by providing 454 multi-family residential units in close proximity to numerous transit options, including being in walking distance to the Vermont/Beverly Metro Red Line Rail Station. The Project Site is also in close proximity with Vermont Avenue, which is an established commercial corridor that provides employment opportunities and neighborhood services and amenities.

The requested General Plan Amendment from Limited Industrial to Commercial Manufacturing land use designation corresponding to the CM Zone would provide the incentive and flexibility that is needed to generate new multi-family housing near transit and commercial centers. The City's L.A.'s Green New Deal, the 2019 update to the Mayor's Sustainable City pLAn, proposes that by 2025 the development of 57% of new housing units should be built within 1,500 feet of transit, that 50,000 income-restricted affordable units should be created and preserved by 2035, that 15,000 units of affordable housing need to be built by 2021, and that 10,000 new permanent supportive housing units need to be built by implementing Prop HHH and streamlining the permitting process of permanent supportive housing. The requested General Plan Amendment, along with the Zone Change and the proposed Specific Plan Amendment, would facilitate the process of meeting the City's goals of more restricted affordable housing with supportive services.

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

to the Project would construct 449 Restricted Affordable dwelling units and five managers' units where existing surface parking lots, three small, underutilized one-story commercial buildings, and three small single-family residential buildings are located and would be demolished. The Project design addresses sustainability and minimizes environmental effects. Project would comply with the L.A. Green Building Code, effective January 1, 2017, which requires the use of numerous conservation measures, beyond those required by Title 24 of the California Code of Regulations. The L.A. Green Building Code contains both mandatory and voluntary green building measures to conserve energy, water and other resources, and to avoid other environmental impacts. Among many requirements, the L.A. Green Building Code requires projects to achieve a 20 percent reduction in wastewater generation. Compliance with Title 24 of the California Code of Regulations and the L.A. Green Building Code would reduce the Project's energy and water consumption and other potential environmental effects.

Objective 2.5: *Promote a more equitable distribution of affordable housing opportunities throughout the City.*

Policy 2.5.1: *Target housing resources, policies and incentives to include affordable housing in residential development, particularly in mixed use development, Transit Oriented Districts and designated Centers.*

Policy 2.5.2: *Foster the development of new affordable housing units citywide*

and within each Community Plan area.

The Los Angeles City Council has pledged to support the development of supportive housing in each Council district as an effective measure at ending homelessness. Councilmember Mitch O'Farrell, representative of the district in which the Project Site is located, has stated on his website that "homelessness and the lack of access to services and affordable housing is the most serious crisis facing the City," noting the City of Los Angeles is the most unaffordable housing market in the country. The Councilmember seeks to combat homelessness by working to increase the supply of covenanted affordable housing and providing access to services and permanent supportive housing. Councilmember O'Farrell also states that he "firmly believes the City has an obligation to provide services and access to affordable, supportive housing." The Councilmember's position is in line with the City's Comprehensive Homeless Strategy.

The proposed Project would meet the City's vision of combating homelessness by developing new affordable housing units within the Wilshire Community Plan area, which as previously noted has the City's second greatest capacity for the provision of new housing units. The Project Site is located within walking distance to the Vermont/Beverly Metro Red Line Rail Station, and within the Vermont/Western Transit Oriented District, which is noted in its Purpose to "improve the quality of housing stock in the neighborhood through the construction of affordable housing units" and to "facilitate the provision of studio and one bedroom apartments for...senior citizens (a significant segment of the homeless population) located near....subway stations." Although the Project itself, is not mixed-use, it does provide onsite supportive services for its residents, including case management, mental health services, independent living skills programs, substance abuse programs and job training, and is located in close proximity to Vermont Avenue, which is an established commercial corridor that provides job opportunities and neighborhood retail and services.

Goal 4: *A City committed to preventing and ending homelessness.*

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

The City's commitment to preventing and ending homelessness has been realized in its Comprehensive Homeless Strategy, which notes that land use is "an inseparable factor creating additional opportunities to increase housing stock. Los Angeles has not responded to stronger housing demand by allowing for greater residential density in the nearly 500 square miles of our City. Land use and zoning restrictions can and have limited the supply of housing throughout the City."³⁰ The Comprehensive Homeless Strategy presents data that the City experiences a 9,049 bed deficit for permanent supportive housing for single individuals, which represents the highest need the City is facing relative to the housing gap for the homeless in Los Angeles. The Project would provide permanent supportive housing and supportive social services for persons who are homeless or at-risk of homelessness.

In addition to the Comprehensive Homeless Strategy, the City has recently updated the Mayor's Sustainable City pLAN with L.A.'s Green New Deal which has set targets that would end homelessness by 2028, ensure 57% of new housing units would be built within 1,500 feet of transit by 2025 and 75% of new housing units by 2035, create or preserve 50,000 income-restricted affordable housing units by 2035, build 10,000 new permanent supportive housing units by

³⁰ Comprehensive Homeless Strategy, page 17.

implementing Prop HHH and streamlining the permitting process of permanent supportive housing, and build 15,000 units of affordable housing by 2021 and 45,000 units by 2035. The City's vision for the creation of new affordable units is ambitious and requires the support of the development community to provide such units, particularly ones that would accommodate homeless persons. The Applicant's Project would generate 449 new dwelling units to be occupied by formerly homeless persons and five market rate managers' units.

The Applicant's request for approval of a General Plan Amendment of the land use designation from Limited Industrial to Commercial Manufacturing corresponding to the CM Zone to permit the construction of affordable housing for the formerly homeless and supportive social services, the request for a Zone Change from M1-1 to CM-1 Zone, and the request for approval of a new Subarea D.2 in the Vermont/Western Station Neighborhood Area Plan (SNAP) to construct the affordable housing Project for the formerly homeless would provide for a supply of permanent supportive housing and services to meet the specific needs of persons who are homeless or at-risk of homelessness.

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

Policy 4.1.4: *Target chronically homeless individuals and prioritize the most vulnerable among them for services and Permanent Supportive Housing, including through the coordination of service provision and the efficient access to information so as to rapidly match available services to those in need of services.*

Policy 4.1.6: *Provide housing facilities and supportive services for the homeless and special needs populations throughout the City, and reduce zoning and other regulatory barriers to their placement and operation in appropriate locations.*

The proposed Project would provide housing for Extremely Low to Low Income homeless individuals in furtherance of the foregoing goal, objective and policies with a permanent housing solution in a residential development that also would provide supportive social services onsite for its residents. The supportive social services would offer a range of services that include case management, mental health services, independent living skills programs, substance abuse programs, and job training. The provision of supportive social services to Extremely Low to Low Income homeless persons is a critical element to helping the at-risk population to seek personal betterment, and the Applicant is committed to these supportive service programs and affordable housing to be provided in a high-quality environment.

Enlightenment Plaza will offer a Service Plan dedicated to assisting the residents that are homeless individuals, including those experiencing chronic homelessness with special needs as defined by HUD, unaccompanied homeless persons with disabling conditions, and other homeless individuals with conditions of mental illness and/or chronic medical conditions, developmental disabilities, substance abuse, and HIV/AIDS or co-occurring disorders.

Each resident will be provided case management services as well as mental health services. The program would use the Housing First approach that prioritizes permanent housing for those experiencing homelessness so that the resident may pursue personal goals and improve their quality of life. This approach will be achieved by providing integrated services that allow for a wide range of mental health, substance abuse, and medical and functional needs of the resident to be addressed simultaneously and directly by on-site case managers or coordinated with the

appropriate community provider.

Enlightenment Plaza will provide supportive services and amenities including:

- New tenant orientation to identify the types of services and activities that would benefit them.
- Case management services to develop an Individual Service Plan for each resident to identify short- and long-term goals to be achieved, along with a plan for monthly reviews, at a minimum, of the resident's progress.
- Mental health services on-site that include psychiatric assessments, individual and group therapy, and crisis intervention with a focus on achieving wellness, recovery and housing stability.
- Substance abuse treatment services that address recovery planning and relapse prevention strategies, along with outpatient and inpatient provider referral and treatment options.
- Recreational and educational activities to foster a sense of community within the building and engage the residents with the surrounding neighborhood. Residents will have the opportunity to participate in theatre classes and perform plays in the Project's outdoor amphitheater.
- Housing stabilization and retention are the primary goals for each resident. Residents with specific issues or barriers to complying with lease regulations or pay rent will be helped to overcome these issues in order to prevent eviction.

Enlightenment Plaza's general goals of the Service Plan are to assist the residents in 1) maintaining stable housing, 2) increasing skills and/or income, and 3) achieving self-determined life goals.

The Project is consistent and compatible with the goals, objectives and policies of the Housing Element 2013-2021.

Wilshire Community Plan

The Wilshire Community Plan observes that the "Wilshire area includes only minimal light industrial uses," and that only 0.43 percent of the total Plan Area is designated for industrial use. The largest such area is located along Beverly Boulevard, from Oakwood Avenue to the north, to Council and 1st Streets on the south, to Hoover Street on the east, to Juanita Avenue on the west, and is occupied by various business park type uses. Some of these industrial areas, according to the Community Plan, have been developed with "two story retail and medium-rise office buildings (two to four story); however, the majority of the area has been developed with retail/wholesale businesses and light manufacturing uses."

The Project Site is located on parcels zoned M1-1 and is developed with three small one-story buildings for single-family residences, three small one-story commercial buildings and surface parking lots. The adjacent properties are improved with a variety of residential, commercial and industrial uses. The Project Site is surrounded by parcels that are zoned R4, C2, CM and M1. Within the blocks surrounding the Project Site, bounded by Oakwood Avenue to the north, Juanita Avenue to the west, Madison Avenue to the east, and property adjoining Beverly Boulevard to the south, the adjoining properties are developed with a used-car sales lot and a pest control company that front on Beverly Boulevard on M1-1 zoned property. Adjoining the Project Site on the northwest end is a manufacturer of stone furnishings and fireplace mantels. Directly across from

the Project Site to the east, on the other side of Madison Avenue, the property is zoned M1-1 and is developed with the PATH Affordable Housing Project that provides housing and supportive services similar to those proposed by the Applicant. Additional affordable housing units are currently under construction across the Project Site on the east side of Madison Avenue. Across the Project Site to the west, on the other side of Juanita Avenue, a R4-1 zoned parcel is developed with the La Kretz Villas, a 49-unit residential building that combines subsidized and affordable studio units for individuals who have experienced homelessness and/or disabilities. This Project also provides integrated case management services for the residents through PATH Ventures. Across the Project Site to the west is an office building on a parcel zoned C2-1. A CM zoned parcel is also located across the Project Site to the west. Other nearby buildings in the vicinity along Beverly Boulevard include auto repair shops and a dog and cat hospital located on parcels zoned M1-1.

The Applicant is requesting a General Plan Amendment from Limited Industrial to the Commercial Manufacturing land use designation corresponding to the CM Zone to permit the construction of a new Restricted Affordable housing Project containing a maximum of 454 residential dwelling units including 449 Restricted Affordable Units at the Extremely Low to Low Income level and five managers' units as well as approximately 11,772 square feet of resident-focused supportive services.

The Project is consistent with the following goals, objectives and policies of the Wilshire Community Plan:

Goal 1: Provide a safe, secure and high quality residential environment for all economic, age, and ethnic segments of the Wilshire Community.

Objective 1-1: Provide for the preservation of existing quality housing, and for the development of new housing to meet the diverse economic and physical needs of the existing residents and expected new residents in the Wilshire Community Plan Area to the year 2010.

The Project would provide housing opportunities for Extremely Low to Low Income homeless population that seeks restricted affordable units in a development that provides onsite supportive social services, including case management, mental health services, independent living skills programs, substance abuse programs, and job training. The provision of supportive social services to the residents is a critical element to helping the at-risk population to seek personal betterment, and the Applicant is committed to these supportive service programs and affordable housing to be provided in a high-quality environment. The Project would increase the housing stock and address the homelessness crisis that is most acute in Los Angeles County, which has one-third of the state's homeless population. The Project would replace surface parking lots, three small one-story commercial buildings and three small detached residential buildings with the new construction of affordable dwelling units in a development with high quality design, supportive social services for residents, and open space areas throughout the Project's campus setting.

The proposed Project would offer permanent housing choices for the homeless individuals that are often relegated to shelters or transitional housing. The proposed Project also brings new residential units to an area which consists of a mix of residential, commercial and industrial uses, and is within easy walking distance of several public transit alternatives to access jobs and services.

The proposed Project would guard against the loss of units through conversion or deterioration of units, as the new construction of Restricted Affordable units would guarantee the long-term supply of very low-income housing stock. The Applicant proposes permanent affordable housing with the supportive services designed to ensure that the homeless persons remain housed and get the individualized help they need. The Project would target the chronically homeless individuals as permanent residents, while providing access to the residential supportive services to be provided within the campus setting.

Objective 1-2: *Reduce vehicular trips and congestion by developing new housing in close proximity to regional and community commercial centers, subway stations and existing bus route stops.*

Policy 1-2.1: *Encourage higher density residential uses near major public transportation centers.*

The Project is a 100% Restricted Affordable housing development for the formerly homeless who will also be provided with onsite supportive social services. The Project would provide 449 Extremely Low to Low Income dwelling units and five managers' units within five new high-quality buildings. Due to economic circumstances, residents are unlikely to own personal vehicles, and the Project would not provide any parking for automobiles for these residential units, and only provides parking for the onsite supportive services and for guests. Therefore, the Project by design would result in a low vehicle miles traveled.

Located in close proximity to a subway station and existing bus route stops, the Project site is located within 500 feet of the intersection of Beverly Boulevard and Vermont Avenue, where the Vermont/Beverly Metro Red Line Rail Station, Metro Rapid Bus 754 and two Metro Local Bus lines have stops. The Metro Red Line rail station provides access to the Metro Purple Line at the Wilshire/Vermont rail station and access to the Metro Expo Line and Metro Blue Line at the 7th Street/Metro Center rail station in downtown Los Angeles. The Metro Expo Line ends in downtown Santa Monica and the Metro Blue Line ends in downtown Long Beach with a stop that connects to the Metro Green Line. The Metro Red Line runs from North Hollywood to Union Station, where riders may access the Metro Gold Line.

The most convenient Metro Rapid Bus stop to the Project site is Metro Rapid Bus 754, which runs north-south on Vermont Avenue with a stop at Vermont Avenue and Beverly Boulevard, one block to the west of the Project site. Metro Rapid Bus 754 runs from Sunset Boulevard to the north to the Vermont/Athens Metro Green Line stop to the south. Metro Rapid Bus 754 includes a stop at Exposition Boulevard that accesses the Expo/Vermont Metro Expo Line rail station.

Metro Rapid Bus 754 offers connections to several Metro Rapid Bus lines. To the north, Metro Rapid Bus 754 includes a stop at Hollywood Boulevard which includes a connection to Metro Rapid Bus 780 that runs from the Washington/Fairfax Transit Hub to the west to Colorado Boulevard and Hill Avenue in Pasadena to the east. To the north at Santa Monica Boulevard, a connection is available to Metro Rapid Bus 704 which runs from Santa Monica to the west to the Patsaouras Bus Plaza/Union Station to the east. The Metro Rapid Bus 754 stop at Wilshire Boulevard provides access to Metro Rapid Bus 720 that runs from Santa Monica to the west to the Commerce Center to the east with stops on 5th and 6th Streets through downtown Los Angeles. At Olympic Boulevard and Vermont Avenue, Metro Rapid Bus 728 runs from Century City to the west to the Patsaouras Bus Plaza/Union Station to the east with stops on Hill and Spring Streets through downtown Los Angeles. At Venice Boulevard and Vermont Avenue, Metro Rapid Bus 733 runs from Santa Monica to the west to Patsaouras Bus Plaza/Union Station to the east with

stops on Main and Spring Streets in downtown Los Angeles. Further to the south at Vernon Avenue, Metro Rapid Bus 705 runs from La Cienega Boulevard and Rodeo Road to the west and Santa Monica and San Vicente Boulevards to the north to Long Beach Boulevard and Vernon Avenue to the east.

Two Metro Local Bus lines with stops at Vermont Avenue and Beverly Boulevard are located one block to the west of the Project site. Metro Local Bus 204 runs north-south on Vermont Avenue along the same path as Metro Rapid Bus 754. Metro Local Bus 204 runs from Sunset Boulevard to the north to the Vermont/Athens Metro Green Line stop to the south. Metro Local Bus 204 includes a stop at Exposition Boulevard that accesses the Expo/Vermont Metro Expo Line rail station.

Metro Local Bus 14 runs east-west along Beverly Boulevard from Beverly Hills to the west, with stops at the Beverly Center, Farmer's Market/The Grove and Larchmont Village, to Adams Boulevard and Figueroa Street to the east, with stops at locations in downtown Los Angeles along Grand Avenue and Olive Street.

Therefore, the Project furthers this objective and policy.

Objective 1-4: *Provide affordable housing and increased accessibility to more population segments, especially students, the handicapped and senior citizens.*

Policy 1-4.1: *Promote greater individual choice in type, quality, price and location of housing.*

Program: *The plan promotes greater individual choice by allocating adequate lands in the Plan Area for a variety of residential densities, and for the promotion of housing in mixed-use projects.*

The General Plan and the Housing Element 2013-2021 identify the critical need for more affordable housing to be built in the City of Los Angeles. As discussed more fully in the findings for the Housing Element, the assessment is that the City of Los Angeles is "facing an unprecedented housing crisis," and this crisis impacts all segments of the housing market. The housing crisis is most acute for the homeless population, as observed in the City's Comprehensive Homeless Strategy which reports that a 9,049 bed deficit for permanent supportive housing for single individuals represents the highest need the City is facing relative to the housing gap for the homeless in Los Angeles.

The lack of adequate housing supply has resulted in the increased need for affordable housing for lower income families. The Housing Element notes that housing production is likely insufficient to meet future demands, as the City has not kept pace with projected growth according to the Regional Housing Needs Assessment and that the City has been producing an average of 1,100 affordable units per year since 2006, which falls far below the provision of adequate housing for persons of Extremely Low to Low Income.

The Project proposes an affordable housing development, consisting of 449 Restricted Affordable Units and five managers' units, for the formerly homeless with a majority of the units to be provided as studio units along with a mix of one- and two-bedroom units. Each unit would contain its own bathroom and kitchen. The Project would draw a homeless population that would benefit from the supportive social services to be provided onsite for the residents. The Project Site is in close proximity to transit options offered by the Metro Red Line, Metro Rapid Bus and Metro Local Bus

lines.

The Project is consistent and compatible with the goals, objectives and policies of the Wilshire Community Plan.

Wilshire Center/Koreatown Redevelopment Project

Section 105 – Project Goals

The Project is consistent with the following Wilshire Center/Koreatown Redevelopment Project land use goals :

Goal 3: Promote the economic, social, educational and cultural and physical well-being through the revitalization of the residential, commercial and industrial areas.

The Project would promote the social and physical well-being of the formerly homeless persons that are in great need of supportive housing. The Project would provide housing for a homeless population that would no longer reside on the streets or in makeshift encampments. The residents would be provided with a variety of supportive social services, including case management, mental health services, independent living skills programs, substance abuse programs, and job training. The provision of supportive social services to homeless persons is a critical element to helping the at-risk population to seek personal betterment, and the Applicant is committed to these supportive service programs and affordable housing to be provided in a high-quality environment. The Project would be located where other high-quality affordable dwelling units are located on properties adjoining to the west and the east of the Project Site. The Project would revitalize the existing industrial property that is underutilized with small buildings and surface parking lots with residential uses that have already been established on adjacent parcels.

Goal 4: Promote the livability of the Project Area as a cohesive and sustainable neighborhood.

The Project Site is uniquely located within 500 feet of major transit options. The intersection of Beverly Boulevard and Vermont Avenue, one block to the west of the Project Site, includes the Metro Red Line Rail Station and the bus stops for a Metro Rapid Bus Line and two Metro Local Bus lines which run to areas throughout the City where residents may have easy access to a variety of neighborhood-serving commercial uses and services. The neighborhood would become more cohesive as the Project would connect with the two affordable housing developments that have been constructed in recent years, providing a more cohesive neighborhood.

Goal 5: Encourage the development of housing in a wide range of types, prices, rent levels and ownership options.

The General Plan and the Housing Element 2013-2021 identify the critical need for more affordable housing to be built in the City of Los Angeles. As discussed more fully in the findings for the Housing Element, the assessment is that the City of Los Angeles is “facing an unprecedented housing crisis,” and this crisis impacts all segments of the housing market. The housing crisis is most acute for the homeless population, as observed in the City’s Comprehensive Homeless Strategy which reports that a 9,049 bed deficit for permanent supportive housing for single individuals represents the highest need the City is facing relative to the housing gap for the homeless in Los Angeles.

The lack of adequate housing supply has resulted in the increased need for affordable housing for Extremely Low to Low Income families. The Housing Element notes that housing production is likely insufficient to meet future demands, as the City has not kept pace with projected growth according to the Regional Housing Needs Assessment and that the City has been producing an average of 1,100 affordable units per year since 2006, which falls far below the provision of adequate housing for persons of Extremely Low to Low Income.

The Project proposes an affordable housing development, consisting of 449 Restricted Affordable Units and five managers' units, for the formerly homeless with a majority of the units to be provided as studio units along with a mix of one- and two-bedroom units. Each unit would contain its own bathroom and kitchen. The units would be available to a range of income levels, including Extremely Low (5%), Very Low (11%) and Low (84%), in addition to five market rate managers' units. The Project would draw a homeless population that would benefit from the supportive social services to be provided onsite for the residents. Therefore, the Project provides a wide range of a range of housing types at various affordability levels.

Goal 6: Enhance the safety and security of residents, businesses, employees and visitors.

Security for the Project would be provided via site planning and secured access points of entry. The Project includes an onsite leasing office and onsite manager's units which will provide continuous onsite presence and services for residents to report security concerns. Entry doors to the main building and public areas will be secured with locks and gates to ensure safe and convenient access for residents.

The plans for the Project will incorporate design guidelines as identified in the "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the Los Angeles Police Department. Such design guidelines provide security design measures for semi-public and private spaces, which may include but not be limited to access control to the building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of building entrances in high-foot traffic areas.

To complement the two affordable housing developments that are located adjoining the Project Site to the west and east, the Project would add to the 24-hour population with "eyes on the street," thereby enhancing the safety and security of the residents. The formerly homeless that would occupy the dwelling units are unlikely to own personal vehicles, and therefore, are very likely to increase the pedestrian activity in the neighborhood, thereby adding more "eyes on the street" and enhancing the safety and security of the neighborhood.

Section 401 - General Redevelopment Actions

To accomplish the goals of the Plan as set forth in Section 401, the Project proposes to implement the Plan by:

9. Provision for low- and moderate-income housing;

Section 409.4 – New or Rehabilitated Dwelling Units Within the Project Area

“.....at least fifteen percent (15%) of all new and rehabilitated dwelling units developed within the Project Area by public or private entities or persons other than the Agency shall be available at affordable housing cost to persons and families of low- or moderate-income; and of such fifteen (15%) not less than forty percent (40%) thereof shall be at affordable housing cost to very low-income households.”

The Project would provide 100% Restricted Affordable dwelling units to the formerly homeless at the Extremely Low to Low Income level. The Project would be consistent with the Redevelopment Plan’s general development action of providing low-income housing.

Section 411 – Social Needs

“The realization of the goals established in this Plan are dependent upon providing for the social as well as the physical and economic needs of the residential and business communities of Wilshire Center and Koreatown.”

“The social needs of the community include but are not limited to the need for day care facilities, housing very low- and low-income persons including the elderly and the homeless, English as a second language and literacy programs, educational and job training facilities, counseling and youth-at-risk programs and facilities.”

The Project would fulfill the social needs of the community by providing Extremely Low to Low Income housing for the formerly homeless with supportive social services that include case management, mental health services, independent living skills programs, substance abuse programs, and job training.

The redevelopment of the Project Site with a new affordable housing project would promote community revitalization. The goals of the Redevelopment Plan are met with a project that would provide permanent affordable housing with supportive services in an environment that would be safe and secure for the residents and visitors. The immediate vicinity, which includes residential, commercial and industrial uses, is already developed with affordable residential uses and homeless supportive services that are compatible with the proposed Project. The Project would provide a significant amenity for the Extremely Low to Low Income and homeless population with much needed supportive services. The Project would also be developed with high quality architectural design features.

The Project is consistent and compatible with the goals of the Wilshire Center/Koreatown Redevelopment Project.

Mobility Plan 2035

The Mobility Plan 2035 includes goals that define the City’s high-level mobility priorities. Each of the goals contains objectives and policies that guide the City’s Mobility goals.

In the Mobility Plan 2035, Chapter 3 entitled “Access for All Angelenos” includes the discussion topic “A transportation system is only useful insofar as it accessible and convenient.”

One aspect of accessibility relates to the design of the built environment. The Mobility Plan 2035

recognizes that the “3.8 million people who live in the City have widely varying levels of physical ability. They include the large numbers of children, senior, and people with disabilities.” The Project would accommodate affordable housing for homeless persons, some of whom may well have disabilities or limited physical abilities.

Approval of the 454 Restricted Affordable dwelling units for the formerly homeless, inclusive of the five managers’ units, at a site in close proximity to several mass transit options would be consistent with the purposes of the Mobility Plan. Various modes of travel are encouraged by the Mobility Plan 2035, including walking, biking and using public transit. The proposed General Plan Amendment would be in conformance with the following policies of the Mobility Plan 2035:

Policy 3.1: Access for All: Recognize all modes of travel, including pedestrian, bicycle, transit, and vehicular modes – including goods movement – as integral components of the City’s transportation system.

The residents of the 100% Restricted Affordable housing development would be less likely to own personal vehicles, thereby relying on alternative modes of travel, including pedestrian, bicycle and transit modes. The Project would be located within 500 feet of the Vermont/Beverly Metro Red Line rail station, the Metro Rapid Bus 754 line on Vermont Avenue and two Metro Local Bus lines. The Project would be in close walking distance of the multiple transit options. The Project would provide bicycle parking and storage for the residents. The Project would improve the public sidewalks adjacent to Project Site and would include active ground floor uses to enhance the pedestrian experience and promote walkability. In addition, the Proposed Project will provide 251 bicycle spaces to promote travel by bicycle.

Policy 3.3: Land Use Access and Mix: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.

The Project Site is located approximately 90 feet from Beverly Boulevard, designated as an Avenue II in the Mobility Plan, and within 500 feet of Vermont Avenue, designated as an Avenue I in the Mobility Plan. Vermont Avenue is a major commercial corridor in the Wilshire Community Plan. Residents of the affordable housing development are less likely to own personal vehicles and the close proximity to several mass transit options would further reduce the need for vehicle trips. As such, the siting of the proposed Project at this location would result in fewer vehicle trips. The Vermont/Beverly Metro Red Line rail station and the Metro Rapid Bus that runs north-south on Vermont Avenue allow easy access to other destinations for employment opportunities, retail stores and neighborhood services.

Policy 3.3 notes that “it makes sense for land uses situated near major transit stops to be of the intensity and type that they attract a high number of transit riders” and that the “greatest benefits of transit accrue when the greatest number of potential riders can be located within easy access of the transit services.” The Policy also observes that neighborhoods with “frequent, reliable transit seven days a week are the ideal place to cluster uses and services so that area residents, students, and/or employees can complete a number of errands within a single walk or bike trip.” The proposed Project is ideally situated to allow the residents not only easy access to commercial services in the neighborhood by walking or bicycling, but the ability to use reliable transit options for trips to access job opportunities and services or to accomplish errands without the use of personal vehicles.

Policy 3.4: Transit Services: Provide all residents, workers and visitors with affordable, efficient, convenient, and attractive transit services.

Policy 3.4 recognizes that transit services offer a mobility alternative for residents who do not have access to a car. The policy recognizes that car ownership may be expensive when factoring, besides the cost of a vehicle, the additional costs of fuel, insurance and maintenance. The Project would accommodate Extremely Low to Low Income homeless residents who are less likely to own personal vehicles due to these costs as well as having to bear the costs of housing, food, and health care, among other basic necessities. As described in detail above, the Project provides easy access to several public transit options, including the Vermont/Beverly Metro Red Line Rail Station located within 500 feet of the Project Site. Policy 3.4 notes that when “private vehicles are no longer considered to be a necessity, the cost of living decreases and quality of life improves for everyone.” Residents of the Project would have no need to own a personal vehicle as a mode of transportation.

Policy 3.8: Bicycle Parking: Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.

The Project Site accommodates the required bicycle parking according to the Vermont/Western Transit Oriented District Specific Plan, as amended in new Subarea D.2.

The Project would provide the required 227 bicycle parking spaces in a secure, convenient and well-maintained parking facility located at grade on the ground level in the five residential buildings. An additional 24 short-term bicycling parking spaces would be provided near the main entrance to buildings fronting on Juanita Avenue and Madison Avenue in bike racks installed, per the design guidelines of the Vermont/Western Transit Oriented District Specific Plan, three feet from the curb edge or per the City Department of Transportation’s requirements.

In the Mobility Plan 2035, Chapter 5 entitled “Clean Environments & Healthy Communities” includes the discussion topic “Transportation is deeply implicated in the health of both human beings and natural systems. Mobility directly impacts human health and wellness, both physical and mental. Active transportation modes such as bicycling and walking can significantly improve personal fitness and create new opportunities for social interaction, while lessening impacts on the environment.”

The discussion topic notes that a “2004 analysis found that each additional hour spent in a car per day was associated with a six percent increase in the likelihood of obesity. Walking to transit or biking adds a fitness element to an everyday routine.” As described in detail above, the Project Site’s location in close proximity to public transit and to neighborhood services and retail stores would promote more walking and bicycling by the residents which allow an improvement in personal fitness and create an environment for social interaction as an alternative to the use of personal vehicles.

Policy 5.1: Sustainable Transportation: Encourage the development of a sustainable transportation system that promotes environmental and public health.

The Project Site is located in close proximity to the Vermont/Beverly Metro Red Line rail station, Metro Rapid Bus 754 that runs north-south on Vermont Avenue, and two Metro Local Bus lines. With easy access to transit options and local retail establishments and neighborhood services, residents of the Project would have the healthy option of walking, bicycling and using public transit as a safe, attractive, and convenient mode for environmentally sustainable and physically

beneficial transportation choices.

Policy 5.2: Vehicle Miles Traveled (VMT): Support ways to reduce vehicle miles traveled (VMT) per capita.

This policy notes that a sustainable approach to reducing Vehicle Miles Traveled is to increase “the availability of affordable housing options with proximity to transit stations and major bus stops” and to offer “more attractive non-vehicle alternatives, including transit, walking, and bicycling.” The Project would add 545 affordable housing units to the housing stock in a location with close proximity to a major stop for the Metro Red Line at the Vermont/Beverly Rail Station and Metro Rapid Bus 754 that runs north-south on Vermont. The residents of the Project are less likely to own personal vehicles and thus by walking, bicycling and using public transit the Vehicle Miles Traveled would be reduced.

The Project would be compatible and consistent with goals, objectives and policies of the Mobility Plan 2035.

Health and Wellness Element

In the Introduction to the Health and Wellness Element, the “City of Los Angeles’ Vision of Health” articulates goals for a healthy Los Angeles that include “safe and just neighborhoods that are free of violence;” “a balanced, multi-modal, and sustainable transportation system that offers safe and efficient options for all users;” and “access to affordable, healthy, and safe housing for residents of all ages and income levels.” The Project would create a safe environment with new affordable housing dwelling units for homeless persons, allowing residents to escape the unsafe alternative of living in homeless encampments where personal safety and health are easily jeopardized. As a result, the new housing will be affordable, healthy and safe for the formerly homeless residents, who will also benefit from the sustainable transportation system of the Metro Red Line and Metro Rapid Bus and Local Bus lines as safe and efficient options that are easily accessible.

The Introduction in the “Housing and Community Stability” section notes that “housing and health are inextricably linked. Where a person lives determines their access to, or lack of, health-promoting resources such as goods and services, quality schools, transportation access and jobs.” In addition, the Health and Wellness Element observes that access “to safe, affordable, accessible, and healthy housing is of paramount importance to living a healthy life.” The Project would offer Extremely Low to Low Income homeless persons easy access to goods and services as well as transportation access that are easily accessible in the neighborhood.

The health and wellness of the Project’s residents would be further enhanced by the supportive social services contained within the new residential development. These services would include mental health services with psychiatric assessments, individual and group therapy and crisis intervention. Substance abuse treatment services would address recovery and relapse prevention strategies. The well-being of the residents would be addressed with independent living skills programs and job training. The Project would offer recreational and educational activities to foster a sense of community within the building and engage the residents with the surrounding neighborhood.

In Chapter 2 entitled “A City Built for Health,” a healthy city is one where goods and services are abundant and accessible, so that the “healthy choice is the easy choice for all residents.” Health is supported by active transportation alternatives, which would be in fact accessible to the Project’s residents.

Policy 2.2: Healthy Building Design and Construction:

Promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for healthy living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building materials and universal accessibility using existing tools, practices, and programs.

The Project would revitalize the underutilized Project Site and surrounding area. The Project would demolish large surface parking lots, three small one-story residential buildings, and three small, one-story commercial buildings and would provide a campus of new affordable housing buildings constructed to be consistent with the L.A. Green Building Code which is based on the California Green Building Code and represents a high standard of sustainability, incorporating features that minimize adverse effects on the environment. Healthy building design and construction would also reduce environmental hazards and improve indoor air quality.

A Project's healthy building design develops communal spaces for social interactions, green and open spaces for active and passive activity. The campus-like site plan provides well-positioned open space areas from west to east allowing site grading to Enlightenment Plaza naturally. The largest open space is located along Madison Avenue as a backdrop to the pedestrian and vehicular arrival area. The addition of the drop-off/pick-up turnaround along Madison will slow traffic providing a safer pedestrian crossing connecting PATH Metro Villas to the Project. Once riders and walking visitors arrive at the Project, they will be met with a park-like setting, including a large front lawn and orchard grove, both leading to community gardens to the west. The Project will provide approximately 26,000 square feet of open-to-sky, park-like and courtyard open space for residents and visitors. Building frontage will be set back to provide 12-foot sidewalks along both Madison and Juanita avenues. All units along Oakwood Avenue, on the north side of the site, will face to the east, west or south away from the 101 highway, thereby providing more enjoyable courtyard views.

The Project is designed around a pedestrian oriented site plan, with five multi-family housing buildings framing open spaces that weave through the site. All buildings will have service or community areas flanking the central open axis to activate the ground level and allow for easy flow between indoor and outdoor amenity and circulation spaces. The common open spaces will include one to two larger outdoor hardscape areas with planters and seating for residents to gather for social events. Community gardens and other interactive green spaces and planting areas will be available for residents to encourage wellness, healthy living options, and social interaction. Shaded walking paths lead through the site and connect to the two streets flanking the property to the east and west.

In Chapter 5 entitled “An Environment Where Life Thrives,” Los Angeles is committed to green and sustainable growth that provides a healthy environment for all Angelenos. Persons who have been homeless and living on the streets would be a vulnerable population to be affected by environmental hazards. Affordable housing in a clean, safe and healthy environment where residents have access to supportive services would offer a focus on health that would not otherwise be available to homeless persons.

Policy 5.7: Land Use Planning for Public Health and GHG Emission Reduction:

Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decrease air pollution, especially for children, seniors and others susceptible to respiratory diseases.

This policy notes that creating “land use patterns that make walking, cycling and taking transit viable modes of transportation to multiple destinations reduces the need for driving, and therefore reduces pollution and greenhouse gas emissions.” The Project would provide affordable housing for Extremely Low to Low Income homeless persons in a location that is easily accessible by walking or bicycling to neighborhood-retail uses and services and to the transit corridor of Vermont Avenue where the Metro Red Line Rail Station and Metro Rapid Bus 754 are within 00 feet of the Project Site. As described above, the Project Site is located within walking distance of many bus lines. As such, residents of the Project would have numerous alternatives to the use of personal vehicles, thereby reducing air pollution and greenhouse gas emissions.

In Chapter 7 entitled “Safe and Just Neighborhoods,” public safety is an essential component of a healthy neighborhood, and the effects of violence and crime disproportionately affect the city’s low-income neighborhoods. One of this chapter’s Objectives is to increase the number of non-violent vulnerable offenders, which includes the homeless, who are diverted from incarceration and rerouted into support services.

Policy 7.6: Diversion:

Proactively collaborate with public, private, and nonprofit partners to divert vulnerable populations such as homeless individuals, veterans, individuals with mental health issues, at-risk youth and young adults, and other non-violent offenders from conviction and incarceration to supportive services that promote access to economic, education, housing, and health resources within their communities.

The Project would offer a safe environment for the residents of the 449 Restricted Affordable dwelling units reserved for homeless persons with supportive social services to address the needs of its residents. The supportive services for the residents would include case management, mental health services, independent living skills programs, substance abuse programs, and job training. The provision of supportive social services to homeless persons is a critical element to helping the at-risk population to seek personal betterment, and the Applicant is committed to these supportive service programs and affordable housing to be provided in a high-quality environment consistent with City’s vision to achieve better health and quality of life to be provided in the Applicant’s affordable housing development.

The Project would be compatible and consistent with goals, objectives and policies of the Plan for a Healthy Los Angeles, a Health and Wellness Element of the General Plan.

**FINDINGS FOR ZONE CHANGE
PURSUANT TO LOS ANGELES MUNICIPAL CODE (L.A.M.C.) SECTION 12.32 F**

A. That the proposed Zone Change is in conformity with the General Plan.

See General Plan consistency findings above.

B. That the proposed Zone Change is in conformity with public necessity, convenience, general welfare and good zoning practice.

The proposed Zone Change from M1-1 to CM-1 seeks to create consistency with the emerging land use pattern of an area already developed with multi-family residential, commercial and light industrial uses on residential, commercial and industrial zoned land. The properties zoned M1-1 to the immediate east are developed with the PATH Affordable Housing Development, along with additional affordable units currently under construction. The properties to the immediate east are zoned [Q]CM-1, R4-1 and C2-1 and developed with affordable housing units, an office building and surface parking lots. The properties zoned M1-1 adjoining the Project Site to the south are developed with the commercial businesses of a car rental agency and pest control company. Other properties in the surrounding area to the south and east are zoned M1-1 and developed with a mix of commercial and industrial uses.

The proposed Zone Change to CM-1, in conjunction with the approval of a Specific Plan Amendment to the Vermont/Western Transit Oriented District Station Neighborhood Area Specific Plan (SNAP) to create a new Subarea D.2, would permit the development of residential units with a floor area ratio of up to 3 to 1 that would allow the development of 454 dwelling units, of which 449 units would be Restricted Affordable dwelling units for the Extremely Low to Low Income level. The proposed Subarea D.2 would utilize the use and area regulations of LAMC Section 12.17.1 (CM Zone), except that the permitted residential uses would be those that have met the requirements of a Qualified Permanent Supportive Housing Project (these requirements are contained within this application under the request for a Specific Plan Amendment that creates Subarea D.2).

The Wilshire Community Plan observes that the “Wilshire area includes only minimal light industrial uses,” and that only 0.43 percent of the total Plan Area is designated for industrial use. The largest such area is located along Beverly Boulevard, from Oakwood Avenue to the north, to Council and 1st Streets on the south, to Hoover Street on the east, to Juanita Avenue on the west, and is occupied by various business park type uses. Some of these industrial areas, according to the Community Plan, have been developed with “two story retail and medium-rise office buildings (two to four story); however, the majority of the area has been developed with retail/wholesale businesses and light manufacturing uses.” The M1-1 zoned property located to the east, immediately across Madison Avenue from the Project Site, has been previously approved and developed with a similar affordable housing development. Also on the east side of Madison Avenue, additional affordable housing units are being constructed on the M1-1 zoned land. As a result, the neighboring industrial properties have been developed with a mix of residential, commercial and light industrial uses. The proposed Zone Change to CM-1 would be compatible with existing adjacent development. The Project Site is designated as “Limited Industrial” in the Wilshire Community Plan, with a zoning designation of M1, which does not permit any dwelling units. As part of this application, the Applicant is requesting a General Plan Amendment to the land use of “Commercial Manufacturing,” a designation compatible with the proposed Zone Change to CM-1.

With an approval of the requested Zone Change, the proposed Project would contribute to a more stable population for homeless individuals by the development of a maximum of 449 new Restricted Affordable dwelling units on property now zoned industrial but which has been previously used for residential and commercial purposes. Replacing outmoded, small detached residential buildings and underutilized, small commercial buildings with a well-designed campus of residential buildings would offer housing and supportive services to Extremely Low to Low Income homeless individuals. The Project would create synergy with the existing residential properties for the lower income and homeless that are located to the immediate east and west of the Project Site. This, in turn, creates a vibrant, cohesive neighborhood that is greatly needed in very close proximity to a Metro Rapid Bus stop and the Vermont/Beverly Metro Red Line Rail Station, allowing the residents easy access within walking distance to several transit options. Additionally, the Project Site is located in very close proximity to the commercial corridor of Vermont Avenue.

Approval of the Zone Change to CM-1 would permit the location of residential housing in close proximity to commercial centers, a rail station and several existing bus stops. The Wilshire Community Plan proposes in its land use plan policies support for the type of housing that would be permitted in the CM Zone. Objective 1-2 of the Wilshire Community Plan proposes to “Reduce vehicular trips and congestion by developing new housing in close proximity to regional and community commercial centers, subway stations and existing bus route stops.” This objective is supported by Policy 1-2.1 which seeks to “Encourage higher density residential uses near major public transportation centers.” With a maximum of 454 residential units, the Project proposes a higher density residential use near a major public transportation center, considering that the intersection of Vermont Avenue and Beverly Boulevard, which is within 500 feet of the Project Site, includes a rail station and a Metro Rapid Bus stop.

The Vermont/Western Transit Oriented District Specific Plan (SNAP) includes in its introduction that the Specific Plan was created for the purpose of making “the neighborhood more livable, economically viable, as well as pedestrian and transit friendly.....and achieve maximum benefit from the subway stations as a valuable public asset.” As noted in Section 2 of the SNAP, the purposes of the Specific Plan include “D. Establish a clean, safe, comfortable and pedestrian oriented community environment for residents to shop in and use the public community services in the neighborhood,” and “R. Facilitate the provision of studio and one bedroom apartments for adult students and senior citizens located near colleges, subway stations and along commercial corridors.” The proposed Project, designed with five residential buildings in an open campus setting, would establish a clean, safe, comfortable and pedestrian oriented environment where the residents would have easy access to a subway station and the commercial corridor of Vermont Avenue.

The proposed CM zoning of the Project Site is consistent with the proposed land use designation of Commercial Manufacturing and supports higher density residential development within a Restricted Affordable housing development for Extremely Low to Low Income homeless individuals. The Project is compatible with the Wilshire Community Plan’s goals, objectives and policies, as discussed in the findings for the Community Plan. In general, these goals, objectives and policies encourage the development of higher density new housing in proximity to commercial centers and major transportation centers, along with providing more affordable and increased accessibility for the handicapped and senior citizens, many of which are within the Target Population for Permanent Supportive Housing, i.e., homeless individuals. The proposed Project would offer better housing choices for homeless individuals that are often relegated to shelters or transitional housing, or even worse, have no temporary housing options at all. The proposed Project would also bring new residential units to an area that has a mix of residential, commercial

and light industrial uses, but which offers several options to place residents within easy walking distance of several public transit alternatives and a major commercial corridor.

The approval of the proposed Zone Change would permit the construction of the new residential development consisting of supportive services that are vitally needed by the Extremely Low to Low Income homeless individuals that would occupy the Restricted Affordable dwelling units. Without the approval of the Zone Change, the property would remain underutilized by outmoded buildings that do not generate improved benefits for the homeless community and to the area at large. The immediate area, consisting of existing affordable housing projects and aging commercial properties and limited industrial uses, is no longer viable for the new industrial development. As noted above, the Wilshire Community Plan has already observed that the area has been developed with non-industrial uses.

The Zone Change would permit the construction of a residential development which is compatible with its surroundings (including similar housing developments adjacent to the subject property) and consistent with State and City planning goals. The approval would allow this urban infill site to achieve numerous laudable Planning goals, including affordable housing proximate to mass transit and the introduction of supportive services that are much needed by the Extremely Low to Low Income homeless residents.

Public Necessity, Convenience and General Welfare

Approval of the Zone Change would facilitate a vibrant residential development that would replace aging, outmoded small single-family residences and small commercial buildings. The new development would create a higher density affordable housing project that would be proximate to mass transit options and easily accessible to the commercial corridor of Vermont Avenue. A portion of the surrounding area has emerged as a neighborhood with affordable housing developments that have supportive services. In fact, properties immediately adjacent to the east and the west of the Project Site have been developed with affordable housing for Low income and the homeless. Housing for the Extremely Low to Low homeless individuals is a public necessity, and the location of the proposed new affordable housing development provides a convenience for the public and helps to provide for the general welfare of the public.

In support of the type of residential development proposed by the Applicant, the Wilshire Community Plan includes Objective 1-2 which proposes to “Reduce vehicular trips and congestion by developing new housing in close proximity to regional and community commercial centers, subway stations and existing bus route stops.” This objective is supported by Policy 1-2.1 which seeks to “Encourage higher density residential uses near major public transportation centers.” With a maximum of 454 residential units, the Project proposes a higher density residential use near a major public transportation center, considering that the intersection of Vermont Avenue and Beverly Boulevard, which is within 500 feet of the Project Site, includes a rail station and a Metro Rapid Bus stop.

The Housing Element 2013-2021 affirms in its Executive Summary that the need to accommodate growth results in the need not only for more housing but a “broader array of housing types to meet evolving household types and sizes.” The development of more housing requires a strategy to accommodate residential development in a sustainable way. The Housing Element estimates that the Wilshire Community Plan has the capacity for 51,490 new housing units,³¹ which represents the second highest capacity for new residential units of the 35 Community Plan areas.

³¹ Housing Element 2013-2014, Table 3.1 Summary of Sites with Housing Capacity by Community Plan Area, page 3-4.

The approval of the requested Zone Change, along with the General Plan Amendment and Specific Plan Amendment, would advance the City towards the goal of providing more housing by permitting the construction of a maximum of 449 Restricted Affordable Dwelling Units for Extremely Low to Low Income homeless persons in an area specifically contemplated by the City to help meet the City's housing shortage and comply with its RHNA requirement. A Zone Change to the CM Zone and a General Plan Amendment to Commercial Manufacturing land use designation would permit the construction of affordable housing where it is needed and compatible with the surrounding neighborhood. As the Project Site is located in a Community Plan area that has the capacity for more new housing units than other parts of the City, the Project is consistent with the Housing Element's stated need to accommodate growth.

According to the Regional Housing Needs Assessment (RHNA), the City is expected to need an additional 82,002 new units through 2021, of which 46,590 units (57%) are designated for very low- and low-income households. The Housing Element notes that the "City will face significant challenges in meeting its RHNA income distribution if it is not able to secure additional funding for affordable housing production and preservation." The Applicant proposes to construct affordable housing by proposing a maximum of 449 Restricted Affordable Dwelling Units at the Extremely Low to Low income level and five managers' units, which would assist the City to meet the challenge of the RHNA by maintaining and adding affordable housing units to the housing stock. Considering that the Wilshire Community Plan, as noted above, has the second highest capacity for new housing units of all 35 community plans, the approval of the Zone Change to CM-1 would facilitate the development of much needed housing for Extremely Low to Low Income homeless individuals that is a public necessity which may be fulfilled with the appropriate zoning designation.

The Community Plan further encourages new housing in proximity to transit, goods, services and facilities. In its introductory chapter, the Wilshire Community Plan observed as one of its residential issues that new "development needs to be coordinated with the availability of public infrastructure." Objective 1-2 of the Wilshire Community Plan proposes to "Reduce vehicular trips and congestion by developing new housing in close proximity to regional and community commercial centers, subway stations and existing bus route stops." This objective is supported by Policy 1-2.1 which seeks to "Encourage higher density residential uses near major public transportation centers." The Vermont/Beverly Metro Red Line Rail Station, which is within 500 feet of the Project Site, is the type of public infrastructure improvement that should be easily available to the residents of new residential projects. With a maximum of 454 residential units, the Project proposes a higher density residential use near a major public transportation center. The proposed Project's location near transit options would facilitate the residents' interaction with the community, activating the pedestrian environment and providing more customers to businesses on the commercial corridor of Vermont Avenue. The public convenience and general welfare is enhanced by offering homeless individuals the ability to live in close proximity to transit, job opportunities, various public and private facilities, shopping for necessities and other basic services.

The public necessity, convenience and general welfare are further enhanced by a well-designed campus, with the five buildings arranged to provide common open space areas in courtyards and passageways that serve to improve the quality of life in the neighborhood with improved security and an increased 24-hour population that activates the street. With the development of an attractive residential development consisting of a maximum of 449 Restricted Affordable units for Extremely Low to Low Income homeless individuals and five managers' units, the Project is not only compatible and complementary with the adjacent residential and commercial uses in the immediate vicinity, the Project would fulfill the need to provide clean, sanitary and safe housing

for underserved segment of society. The need for this type of housing is greatly underscored by the report of the Los Angeles Homeless Services Authority in its 2019 Greater Los Angeles Homeless Count that the homeless population in the City of Los Angeles increased by 16% over the previous year, which now consists of 36,300 homeless persons, of which 27,221 need shelter.

The proposed CM zoning of the Project Site is consistent with the proposed General Plan land use designation of Commercial Manufacturing and supports higher density residential development within a affordable housing development for Extremely Low to Low Income homeless individuals. The Project is compatible with the Wilshire Community Plan's goals, objectives and policies, as discussed in the findings for the Community Plan. In general, these goals, objectives and policies encourage the development of higher density new housing in proximity to commercial centers and major transportation centers, along with providing more affordable and increased accessibility for the handicapped and senior citizens, many of which are within the Target Population for Permanent Supportive Housing, i.e., homeless individuals. The proposed Project would offer better housing choices for homeless individuals that are often relegated to shelters or transitional housing, or even worse, have no temporary housing options at all. The proposed Project would also bring new residential units to an area that has a mix of residential, commercial and light industrial uses, but which offers several options to place residents within easy walking distance of several public transit alternatives and a major commercial corridor. The proposed Zone Change to the CM Zone would facilitate the much needed housing for an underserved segment of society, and as a result, the Zone Change would promote the public necessity, convenience and general welfare to accommodate a population that would benefit from housing and supportive services for those in the greatest need.

Good Zoning Practices

The location of the proposed Restricted Affordable housing development as it fronts on Madison Avenue to the east and Juanita Avenue to the west supports good zoning principles in that this location would be appropriately rezoned to the CM Zone. The General Plan Framework notes that the City of Los Angeles has "insufficient vacant properties to accommodate forecast population increases. Consequently, the City's growth will require the reuse and intensification of existing developed properties."³² The existing Project Site consists of three, small one-story residential buildings and three, small underutilized one-story commercial buildings. The Project Site also includes a large amount of parking lot areas that should be utilized to accommodate an intensification of the land use in order to construct an affordable housing development.

A basic principle of good zoning practice, and State law as required by California Government Code Section 65860, is consistency between the General Plan land use designation and zoning designations. The General Plan Framework's Objective 3.1 seeks to accommodate a "diversity of uses that support the needs of the City's existing and future residents, businesses and visitors." The Objective is supported by Policy 3.1.6 which proposes to allow for the "adjustment of General Plan Framework Element land use boundaries to account for the changes in the location and introduction of new transit routes and stations...and, in such cases, consider the appropriate type and density of use generally within one-quarter mile of the corridor and station to reflect the principles of the General Plan Framework Element and the Land Use/Transportation Policy." The Applicant is requesting approval of a General Plan Amendment to revise the land use designation in the Wilshire Community Plan from Limited Industrial (corresponding to the existing M1 Zone) to Commercial Manufacturing (corresponding to the requested CM Zone). The requested General Plan Amendment to Commercial Manufacturing would create a development site compatible with

³² The Citywide General Plan Framework, page 3-4.

the Wilshire Community Plan's recognition of a residential community issue that there is a need to accommodate more affordable housing in transit-rich areas.

Rezoning the subject property from M1 to CM would result in consistency with residential goal, objectives and policies of the Wilshire Community Plan. Goal 1 seeks a "high quality residential environment for all economic, age, and ethnic segments of the Wilshire Community." The Applicant proposes to build a high quality residential campus of five buildings of Restricted Affordable units for Low income and formerly homeless individuals. Objective 1-2 seeks to "Reduce vehicular trips and congestion by developing new housing in close proximity to regional and community commercial centers, subway stations and existing bus route stops.: This objective is supported by Policy 1-2.1 which proposes to "Encourage higher density residential uses near major public transportation centers." The CM Zone, in conjunction with the proposed Specific Plan Amendment, would permit the development of the affordable housing project. The Project would be located within 500 feet of the Metro Red Line Rail Station located at Vermont Avenue and Beverly Boulevard, and several Metro bus lines, including the Metro Rapid Bus Line 754, that have stops at Vermont Avenue and Beverly Boulevard. Additionally, Vermont Avenue is a commercial center within easy walking distance of the Project. The Project would replace underutilized buildings on a lot that is 2.09 acres in size in order to create a higher density residential use that is near the major transportation center at Vermont Avenue and Beverly Boulevard. Objective 1-4 seeks to "Provide affordable housing and increased accessibility to more population segments, especially students, the handicapped and senior citizens." The Target Population for the Applicant's affordable housing project would include the handicapped and senior citizens." Policy 1.4-2 proposes to "Ensure that new housing opportunities minimize displacement of residents." In addition to the demolition of commercial buildings, the Project would replace three small one-story single family residential buildings in order to facilitate the development of 454 dwelling units, of which 449 units would be occupied by Extremely Low to Low Income homeless individuals. As such, the displacement of existing residents is significantly minimized by the development of a high-density residential project, which would provide affordable housing for a wide range of population segments that are lacking permanent housing opportunities.

The Project reflects the existing land use patterns, trends and uses in the immediate area, which is developed with a mix of residential, commercial and light industrial projects on properties currently zoned for a mix of residential, commercial and industrial uses. The Project would create synergy with the existing residential properties for the lower income and homeless that are located to the immediate east and west of the Project Site. This, in turn, creates a vibrant, cohesive neighborhood that is greatly needed in very close proximity to a Metro Rapid Bus stop and the Vermont/Beverly Metro Red Line Rail Station, allowing the residents easy access within walking distance to several transit options.

Based on the foregoing, the proposed Zone Change promotes good zoning practices by allowing the affordable housing development that is consistent with a coherent zoning pattern of establishing a CM Zone for parcels that are within close proximity to a commercial center and a major transportation corridor that includes a Metro Rail station and Metro Rapid Bus stop.

**SPECIFIC PLAN AMENDMENT VERMONT/WESTERN TRANSIT ORIENTED DISTRICT
SPECIFIC PLAN (STATION NEIGHBORHOOD AREA PLAN) PURSUANT TO L.A.M.C.
SECTION 11.5.7 G**

The Applicant requests approval of a Specific Plan Amendment to introduce a new Subarea within the Vermont/Western Transit Oriented District Specific Plan - Station Neighborhood Area Plan (SNAP), Subarea D.2 - Commercial Manufacturing/Permanent Supportive Housing, to permit the construction of a new five building Restricted Affordable housing project with supportive social services for homeless and formerly homeless individuals containing a maximum of 454 residential dwelling units including 449 Restricted Affordable units and 5 managers' units and approximately 11,772 square feet of resident focused supportive services.

The Project Site is located in a developed area and affords a unique opportunity for redevelopment of an otherwise underutilized site on industrial land in a neighborhood where adjoining industrial land has been similarly converted to much-needed affordable housing for homeless persons. The goals of the SNAP seek to create a higher density of land uses and a livelier pedestrian environment along and in close proximity to major transit corridors such as Vermont Avenue. With the approval of the Specific Plan Amendment, the Project would be consistent with the following goals and purposes outlined by the Specific Plan:

Section 2.C: Establish a clean, safe, comfortable and pedestrian oriented community environment for residents to shop in and use the public community services in the neighborhood.

The Specific Plan Amendment creates regulations to ensure the proposed Project would provide a much needed, convenient, high quality affordable housing development for Extremely Low to Low Income homeless persons in a location that is now occupied by surface parking and underutilized small, one-story residential uses and buildings for storage and telecommunications purposes. The Project would provide a safe, clean and healthy environment for a resident population that is currently underserved.

Currently, the SNAP allows the use and area regulations of the CM Zone (LAMC Section 12.17.1) to be applied to all lots in Subarea D, except that projects with residential uses are prohibited. The Specific Plan Amendment to create a new Subarea D.2 to allow for an affordable housing development in the proposed CM Zone would be consistent with the purpose of the SNAP to establish a clean, safe, comfortable and pedestrian oriented community environment for the residents. The Project would be located within 500 feet of the commercial corridor of Vermont Avenue, where residents may shop and use the public community services in the neighborhood. The development of the Applicant's Project would be incompatible with adjacent development and would provide a sense of place in the vicinity of Beverly Boulevard and Vermont Avenue consistent with good zoning practice. Properties that adjoin the Project Site are zoned residential, commercial and industrial, developed with a mix of residential, commercial and industrial uses. Similar affordable housing developments adjoin the Project Site to the immediate east and west, with one affordable development on industrially zoned land and the other on residentially zoned land. The development of the proposed affordable housing Project would create a synergy with other similar projects, resulting in an enhanced pedestrian oriented community.

Section 2.E: Guide all development, including use, location, height and density, to assure compatibility of uses and to provide for the consideration of transportation and public facilities, aesthetics, landscaping, open space and the economic and social well-being of area residents.

The Specific Plan Amendment would establish a new Subarea D.2 with associated Development Standards and Guidelines and would change the Subarea designation for the Project Site from Subarea D (Light Industrial/Commercial) to Subarea D.2 (Commercial Manufacturing/Permanent Supportive Housing). Subarea D.2 would contain development regulations tailored to the specific needs of a high density affordable housing project. The Specific Plan Amendment proposed regulations are intended to accommodate the Project while requiring it to adhere to design and development regulations ensuring that its built form is urban scaled, pedestrian friendly, transit oriented, and otherwise compatible with the mix of uses in adjacent developments.

The Specific Plan Amendment would create regulations for allowable uses, height, floor area, density, usable open space, and parking. It would also include design guidelines that address landscape plans, streetscape, pedestrian and vehicular circulation, building design, trash and recycling location, urban form, building form, façade treatment, building setbacks, and lighting.

The Specific Plan Amendment would only apply to the Project Site. Subarea D.2 would contain specific requirements for eligibility, including that the Project Site must be improved with a Qualified Permanent Supportive Housing Project to be eligible for residential uses.

The Specific Plan Amendment would lead to a development that would be deemed consistent with public necessity, convenience, general welfare and good zoning practice, as outlined in the findings for the requested Zone Change from M1-1 to CM-1. As specified in the findings for the General Plan Amendment, Zone Change and the Site Plan Review, the proposed Specific Plan Amendment would be consistent with the General Plan Framework, the Housing Element, the Wilshire Community Plan, the Wilshire Center/Koreatown Redevelopment Project, the Mobility Plan 2035, and the Health and Wellness Element.

Section 2.G: Create a transit friendly area by requiring conformance to pedestrian oriented design guidelines that establish building façade treatments, landscape standards, criteria for shade-producing building overhangs and awnings, street lighting and security lighting for streets, alleys, sidewalks and other pedestrian areas that adjoin new development.

The Specific Plan Amendment would create regulations for allowable uses, height, floor area, density, usable open space, and parking. It would also include design guidelines that address landscape plans, streetscape, pedestrian and vehicular circulation, building design, trash and recycling location, urban form, building form, façade treatment, building setbacks, and lighting.

The Specific Plan Amendment requires the Project achieve almost the same design criteria as required for residential developments in other Subareas. A few design criteria would be modified in recognition of the unique development constraints for an affordable housing project on industrial land, but the Project proposes to be a transit and pedestrian friendly project that is conveniently located within close proximity to major transit options. The Project would support transit usage as the residents of the affordable housing development would be less likely to own personal vehicles for transportation. As described above, the Project would improve adjacent streetscape and activate the streets with more pedestrian activity.

Section 2.R: Facilitate the provision of studio and one bedroom apartments for adult students and senior citizens located near colleges, subway stations and along commercial corridors.

The Specific Plan Amendment would facilitate the development of affordable housing for

Extremely Low to Low Income homeless persons. The resident population would most likely include, among other age groups, senior citizens who are homeless or at-risk of homelessness. The Los Angeles Homeless Services Authority issued the “Greater Los Angeles Homeless Count” report in 2018, noting there was a 22% increase in homelessness for persons aged 62 and older, while there was a decrease in homelessness for all other age groups. Senior citizens would benefit from the provision of more affordable units located near subway stations and commercial corridors.

The Project proposes to provide 454 Restricted Affordable units, inclusive of the five managers’ units, consisting of 370 studio units, 71 one-bedroom units and 13 two-bedroom units. The Specific Plan Amendment facilitates the provision of studio and one bedroom apartments for approximately three-quarters of the total units. The Project is located within 500 feet of the Vermont/Beverly Metro Red Line subway station and the commercial corridor of Vermont Avenue.

**FINDINGS FOR PROJECT PERMIT COMPLIANCE PURSUANT TO L.A.M.C. SECTION
11.5.7.C**

- 1. That the project substantially complies with the applicable regulations, standards and provisions of the Specific Plan.**

For the reasons stated above, the proposed Project substantially complies with the applicable regulations, standards and provisions of the Vermont/Western Transit Oriented District Station Neighborhood Area Specific Plan (SNAP) as amended by the Specific Plan Amendment to create Subarea D.2.

- 2. That the project incorporates mitigation measures, monitoring measures when necessary, or alternatives identified in the environmental review which would mitigate the negative environmental effects of the project, to the extent physically feasible.**

The Project will undergo CEQA review by the City and any appropriate environmental mitigation measures will be placed on the project at that time.

PROJECT PERMIT COMPLIANCE FINDINGS

1. **ADDITIONAL INFORMATION/FINDINGS:** Please complete all of the following which apply to your request. You may attach additional sheets if necessary if there is not enough room in the spaces provided.

- a. Specific Plan area: **Vermont/Western Transit Oriented District Station Neighborhood Area Specific Plan**
- b. Specific Plan subarea (if any): **Subarea D.2**
- c. Specific Plan land use designation (if any): **Commercial Manufacturing**
- d. Specific Plan requirements: Specify those which apply to the subject property:
- i. Maximum permitted height: **Unlimited**
 - ii. Maximum permitted floor area ratio (FAR): **The maximum permitted FAR for Qualified Permanent Supportive Housing is 3 to 1.**
 - iii. Minimum required setbacks/yards:
 - Front: None (CM Zone)
 - Side: Developer Incentive for 5 ft.
 - Rear: Does not apply to Development Site.
 - iv. Maximum lot coverage: **n/a**
 - v. Parking requirements: **None for affordable units with Target Population residents. 1 space per every 20 dwelling units for the purpose of accommodating guests, supportive services, case management and managers' units.**
 - vi. Transportation improvements/fees: **n/a**
 - vii. Other requirements: **n/a**
- e. What is the current zoning on the subject property? **Existing Zone: M1-1. Proposed Zone: CM-1 (per Zone Change)**
- f. Subject property is (check whichever applies): level; sloping; rectangular;
 irregular-shaped parcel of land.
- g. Describe how the site is presently developed, including details such as square footage of buildings, occupancy loads, number of stories, number of parking spaces provided, etc.

Site is presently developed with six small buildings and parking lots to be demolished. These buildings include: 1. One-story masonry building with 387.69 square feet. 2. One-story brick building with 5,336.04 square feet. 3. One-story sheet metal building with 2,157.39 square feet. 4. One-story wood building with 390.02 square feet. 5. One-story wood buildings with 390.41 square feet. 6. Two-story wood building with 738.42 square feet. 194 parking spaces, including one handicapped space, are located on the surface parking lots.

h. Adjacent Properties

	Zoning or Specific Plan Land Use Designation	Existing Land Use
Northerly	PF-1XL	101 Freeway
Southerly	M1-1	Surface parking; auto sales; warehouse; light manufacturing and auto body repair.
Westerly	[Q]CM-1, R4-1 and C2-1	A low-income multi-family affordable housing residential building, an office building, and surface parking.
Easterly	M1-1	Affordable housing residential development and a pest control company.

i. Proposed Project

i. Height: (Approximates)

- Building NE: 92 feet 3 inches
- Building NW: 94 feet 3 inches
- Building SE: 93 feet 7 inches
- Building SW-A: 94 feet 6 inches
- Building SW-B: 95 feet 0 inches

ii. Project floor area: 247,812 square feet (floor area definition from Subarea D.2)

iii. Total floor area ratio (FAR): 2.8:1

iv. Number of dwelling units: 454

v. Setbacks/yards:

- Front: 0 feet
- Rear: n/a
- Side: at least 5'-1" feet

vi. Lot coverage: 48% building coverage

vii. Number of parking spaces to be provided: The Applicant proposes to provide up to 23 parking spaces.

viii. If demolition is proposed, describe the type of buildings/structures to be removed, amount of floor area demolished and any buildings/structures to remain:

Six buildings and surface parking lots with 194 spaces are to be removed. The six buildings have a combined floor area of approximately 9,400 square feet. No buildings or structures are to remain on the Development Site.

FINDINGS FOR SITE PLAN REVIEW PURSUANT TO L.A.M.C. SECTION 16.05

Pursuant to LAMC Section 16.05 F, the following findings are required for any project that proposes more than 49 new residential dwelling units.

1. That the project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan, and any applicable specific plan;

See General Plan consistency findings above.

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

The Project is designed to be compatible with the existing and future development on adjacent and neighboring properties. To the east of the Development Site, across Madison Avenue, is the PATH Affordable Housing Project and the construction of additional affordable dwelling units in multi-family buildings. To the west of the Development Site, across Juanita Avenue, is a four-story La Kretz Villas affordable housing development. The Project would be designed with many similar design features of building articulation that is provided with building massing, fenestration locations and material color and texture choices.

The Project would be consistent with the City's vision in its Comprehensive Homeless Strategy that encourages greater density in areas of the City most capable of supporting it, and proposes that the City "should also investigate how well its various zoning density programs are doing to encourage or mandate additional residential development. Further study into reducing or removing parking minimums for affordable and homeless housing profiles, where residents own cars at much lower rates than market-rate housing, could lower the cost of affordable and homeless housing development and ensure efficient use of space for areas where more residential density is needed."³³

The City's Comprehensive Homeless Strategy notes that land use is "an inseparable factor creating additional opportunities to increase housing stock. Los Angeles has not responded to stronger housing demand by allowing for greater residential density in the nearly 500 square miles of our City. Land use and zoning restrictions can and have limited the supply of housing throughout the City."³⁴

The City's vision to address the housing crisis is contained within L.A.'s Green New Deal, the 2019 update to the Mayor's Sustainable City pLAn, which sets targets to increase cumulative new housing unit construction to 150,000 by 2025 and 275,000 units by 2035, and to ensure 57% of new housing units are built within 1,500 feet of transit by 2025 and 75% by 2035. These targets, by necessity, require higher density residential development, given that the Comprehensive Homeless Strategy has identified the need for greater residential density.

The proposed Project consists of an arrangement of buildings and structures, off-street parking,

³³ Ibid, page 17.

³⁴ Comprehensive Homeless Strategy, page 17.

lighting, landscaping and trash collection that is or will be compatible with existing and future development on the neighboring properties:

- Height of Buildings: 95 feet for tallest building (unlimited height limit is permitted by the Specific Plan Amendment for Subarea D.2 in the SNAP).
- FAR: Approximately 2.8 to 1 overall (3 to 1 FAR is permitted for Qualified Permanent Supportive Housing Projects by Specific Plan Amendment for Subarea D.2 in the SNAP).

Off-street Parking Facilities: 23 automobile parking spaces and 251 bicycle parking spaces are required and provided. The following automobile parking standards apply to all Qualified Permanent Supportive Housing Projects: None for affordable units with Target Population residents. One (1) parking space for every 20 dwelling units or guest rooms shall be provided for the purpose of accommodating guests, supportive services, case management and managers' units. Up to 40% of the total required parking spaces may be provided as compact stalls. The Project consists of 454 dwelling units, resulting in the requirement of 23 parking spaces that are provided on-site in ground level garage spaces. The Project will provide 15 standard parking spaces, 5 compact spaces and 3 handicapped spaces.

- Off-street parking spaces for bicycles shall be provided at a ratio of one-half parking space per dwelling unit, which results in 251 bicycle parking spaces for the 454 dwelling units. No bicycle parking shall be required for the non-residential uses in a Qualified Permanent Supportive Housing Project that consist of supportive services, case management offices, computer rooms and other non-residential uses related to providing services to the Target Population. In addition, 24 bicycle parking spaces are provided on the street frontages of Juanita Avenue and Madison Avenue, consistent with the design guidelines of the Vermont/Western Transit Oriented District SNAP.
- Yards: The minimum front yard setback would be 0 feet. The minimum interior yard setback would be 5' – 1" for a portion of the Southwest Building B between the building and the southwesterly property line. All other interior yard setbacks range from 10' – 2" to 13' – 11".
- Open Space and Landscaping: The Project would create approximately 36,580 square feet of open space including 7,627 square feet of landscaped areas. The large central courtyard will activate pedestrian activity on the Development Site with landscaping provided with trees and planters.

Height, Bulk and Setbacks

The project is proposed to reach a maximum height of 95 feet for the eight-story residential Southwest Building B located within the interior of the Development Site behind the Southwest Building A that fronts on Juanita Avenue. The Southwest Building A is proposed to reach a maximum height of 94 feet 6 inches. The Northeast Building that fronts on Oakwood Avenue is proposed to reach a maximum height of 92 feet 3 inches. The Northwest Building that fronts on Juanita Avenue is proposed to reach a maximum height of 94 feet 3 inches. The Northeast Building is proposed to reach a maximum height of 92 feet 3 inches. The Southeast Building that fronts on Madison Avenue is proposed to reach a maximum height of 93 feet 7 inches.

The bulk and massing of the five residential buildings that are 8 stories in height avoid blank

walls with articulations, recesses, balconies and terraces on upper level. The approximately 26,000-square foot courtyard is the Project's driving concept, which is allowed to transform both horizontal and vertical planes. The transformations provide various scales of communal spaces for tenants to engage with and activate. Horizontal plane transformation informs building location, spacing, orientation, proportions and size. Vertical plane transformations inform initial building massing, voids and unit orientation. Additionally, the courtyard influences the location of interior communal spaces that overlook the larger outdoor park space in the courtyard.

Madison Avenue is designated as the Development Site's front yard, which will have varying setback from 0 feet to 21 feet. The minimum interior side yard setbacks are 5 feet, but generally range between 10 feet and 13 feet. Pedestrian activity is encouraged throughout the Project Site as outdoor passageways connect to the street frontages of Juanita Avenue, Oakwood Avenue and Madison Avenue.

Off-street Parking Facilities

Residential parking will be provided according to the following automobile parking standards that apply to all Qualified Permanent Supportive Housing Projects: None for affordable units with Target Population residents. One (1) parking space for every 20 dwelling units or guest rooms shall be provided for the purpose of accommodating guests, supportive services, case management and managers' units. Up to 40% of the total required parking spaces may be provided as compact stalls. The Project consists of 454 dwelling units. Although the City cannot enforce parking requirements pursuant to Government Code Section 65915(p), the Project will provide 23 parking spaces on-site in ground level garage spaces. The Project will provide 15 standard parking spaces, 5 compact spaces and 2 3 handicapped spaces.

Bicycle parking will be provided according to the ratio of one-half parking space per dwelling unit, which results in 251 bicycle parking spaces for the 454 dwelling units. No bicycle parking shall be required for the non-residential uses in a Qualified Permanent Supportive Housing Project that consist of supportive services, case management offices, computer rooms and other non-residential uses related to providing services to the Target Population. In addition, 24 bicycle parking spaces are provided on the street frontages of Juanita Avenue and Madison Avenue, consistent with the design guidelines of the Vermont/Western Transit Oriented District SNAP.

As shown on the Plot Plan, all automobile parking is provided within the ground level of the Northeast Building, the Southwest Building A and the Southeast Building, which is accessed respectively by the driveways on Oakwood Avenue, Juanita Avenue and Madison Avenue. Bicycle parking and storage are provided with the ground level of all five buildings.

Open Space and Landscaping

The required open space would be 45,725 square feet of open space. However, the Applicant is requesting a Developer Incentive pursuant to LAMC Section 11.5.11(e) for a 20% reduction in overall open space for a total requirement of 36,580 square feet.

The Project would provide the majority of open space in one large landscaped courtyard area throughout the entire Development Site. The Northeast Building would provide additional outdoor open space in a podium deck and a roof deck. Indoor common open space would be provided in community rooms in some buildings. Consistent with the proposed SNAP

Subarea D.2 open space requirements, all common open space areas would have a minimum horizontal dimension of 20 feet and an overall minimum dimension of 600 square feet, and they make up less than 40 percent of the required open space. Additionally, 27,229 square feet of open space would be provided on the ground floor level.

The courtyard will activate pedestrian activity on the Development Site with landscaping provided with trees and planters. Activity space will be created with the barbecue and dining areas and the game tables. Residents will have access to the community garden. Outdoor seating areas are spread throughout the open space courtyard and the passageways that link all buildings.

The Project will provide 7,627 square feet of landscaped area, which would accommodate a total of 114 trees.

Loading Areas, Lighting and Trash Collections

Lighting and trash collection areas are provided consistent with City Code requirements. Trash room and trash enclosure areas are provided for the residential and supportive services uses of the Project. The trash collection areas are accessible on the ground level of each building. Loading areas are not contained within the buildings. The Project proposes a drop-off and arrival area within a loop driveway along Madison Avenue, as it fronts on the courtyard and is located between the Northeast Building and the Southeast Building.

3. That any residential project provides recreational and service amenities to improve habitability for its residents and minimize impacts on neighboring properties.

As a Qualified Permanent Supportive Housing project, the Applicant's development provides 11,772 square feet of case management supportive services including 5,700 square feet dedicated to case management offices with meeting areas and 6,072 square feet of interior common open space for the residents. The Project will provide an indoor fitness center and extensive outdoor recreational activity areas in the approximately 26,000-square foot open space courtyard. The courtyard includes barbecue and dining areas, a community garden, outdoor seating areas, a dog park, game tables, an outdoor amphitheater, a shade structure, and a passageway that connects to the street frontages of Juanita Avenue, Oakwood Avenue and Madison Avenue. The Project's recreational and service amenities will improve the habitability for its residents. With a large outdoor courtyard that provides many activity areas for the residents, the Project's recreational amenities minimize impacts on neighboring properties.

SUBDIVISION MAP ACT

FINDINGS FOR VESTING TENTATIVE TRACT MAP NO. 82798 PURSUANT TO LAMC SECTIONS 17.01 & 17.15

Pursuant to **California Government Code Sections 66473.1, 66474 (Subdivision Map Act) and LAMC Section 17.01 and 17.15**, the Project Applicant requests approval of a Vesting Airspace Tentative Tract Map to permit the merger and re-subdivision of the land and the creation of one ground lot containing 5 air space lots necessary to facilitate the development of the project. The Project Applicant also requests to record the Final Map in phases. The requested Lots included:

- i. Lot 1: Master Ground Lot
- ii. Airspace Lot 2: Northeast
- iii. Airspace Lot 3: Southeast
- iv. Airspace Lot 4: Southwest B
- v. Airspace Lot 5: Southwest A
- vi. Airspace Lot 6: Northwest

1. The proposed map will be/is consistent with applicable General and Specific Plans.

The proposed Vesting Airspace Tentative Tract Map enables the consolidation of urban infill lots for the proposed affordable housing development project. The project as designed is consistent with various elements and objectives of the General Plan. See General Plan consistency findings above.

2. The site is physically suitable for the proposed type of development.

The Development Site consists of a Lot Area of 90,974 square feet comprised of the Assessor Parcels 5501-001-023 and 5501-001-800. Located mid-block on the east side of Juanita Avenue, north side of Oakwood Avenue and fronting on the west side of Madison Avenue, the Project Site is generally bound by Juanita Avenue to the west, Oakwood Avenue to the north, Madison Avenue to the east, and private property to the south that borders on Beverly Boulevard. The site is a generally level parcel of land which is physically suitable for the proposed five residential buildings, all of which are 8 stories. The Project is not located in a Hillside Area, a Very High Fire Hazard Severity Zone, a Flood Zone, a Hazardous Waste Area, a Landslide Area, or a Liquefaction Area.

The site is prime location for developing a high-density residential development in close proximity to major transit options and a commercial corridor. The site is located within 500 feet of the Vermont/Beverly Metro Red Line Rail Station and the commercial corridor of Vermont Avenue. The Wilshire Community Plan includes Objective 1-4, which seeks to “provide affordable housing and increased accessibility to more population segments, especially students, the handicapped and senior citizens. The Vermont/Western Transit Oriented District Specific Plan (SNAP) includes as one its purposes to “facilitate the provision of studio and one bedroom apartments for adult students and senior citizens located near colleges, subway stations and along commercial corridors.” The Project would consist of Restricted Affordable units for the Extremely Low to Low Income level homeless individuals, many of whom would be senior citizens. The Project proposes to provide primarily studio and one bedroom units, with only a few two bedroom units.

Therefore, the Development Site is suitable for Permanent Supportive Housing project.

3. The site is physically suitable for the proposed density of development.

The Development Site is physically suitable for the 454 residential units that would be ultimately constructed within 8-story buildings on 2.09 acres. The Project includes a maximum of 454 residential units; ample supportive services that consist of community rooms, case management offices, computer rooms and kitchens; and common indoor area consisting of lobbies, mailrooms and laundry rooms. The Project would be allowable under the requested land use designation of Commercial Manufacturing and the Zone Change from M1-1 to CM-1, along with the Specific Plan Amendment to create new Subarea D.2. The subject site is currently zoned M1-1 within the Wilshire Community Plan area of the City of Los Angeles and is designated Limited Industrial by the Community Plan. The designated height for the site is "1," limiting the site to a FAR of 1.5 to 1 on the project site. Concurrent with this application for a Vesting Tentative Airspace Tract Map, the Applicant has requested a General Plan Amendment from Limited Industrial to Commercial Manufacturing to Commercial Manufacturing, corresponding to the requested Zone Change to the CM Zone.

The Applicant has also requested a Specific Plan Amendment to the Vermont/Western Transit Oriented District Specific Plan Station Neighborhood Area Plan (SNAP) to permit the construction of a new Restricted Affordable housing development. The Specific Plan Amendment to the SNAP would create a new Subarea D.2, which would establish a FAR of 3 to 1 for the project site. The Buildable Area of the project site is 87,466 square feet, which would yield 262,398 square feet of floor area for a 3 to 1 FAR upon approval of the requested Zone Change and Specific Plan Amendment. The project is proposed to provide 247,812 square feet of floor area for the residential units, case management services, indoor open spaces and common areas. which results in a FAR of 2.8 to 1.

The subject property is located within the Wilshire Center/Koreatown Recovery Redevelopment Project which designates the site as Limited Industrial. Section 1100 of the Redevelopment Plan indicates that "if and when the City's General Plan is amended so as to change the land uses permitted within the Project Area, the land uses specified for the Project Area in the City's General Plan as so amended shall supersede the land use designations on the attached Redevelopment Plan Map and all of the other land use provisions of this Plan, to the extent that such Plan land use designations and provisions are inconsistent with the City's General Plan as so amended." As part of this application, the Applicant is requesting a General Plan Amendment from Limited Industrial to Commercial Manufacturing, a land use designation that would permit, along with the Zone Change to the CM Zone, the residential development that is proposed for the subject property.

Section 401 of the Redevelopment Plan proposes to implement general redevelopment actions, which include Section 409.4 (New or Rehabilitated Dwelling Units Within the Project Area), which states that "...at least fifteen percent (15%) of all new and rehabilitated dwelling units developed within the Project Area by public or private entities or persons other than the Agency shall be available at affordable housing cost to persons and families of low- or moderate-income; and of such fifteen (15%) not less than forty percent (40%) thereof shall be at affordable housing cost to very low-income households." The Project would provide 100% Restricted Affordable dwelling units to the homeless and formerly homeless at the Extremely Low to Low income level. The Project would be consistent with the Redevelopment Plan's general development action of providing low-income housing.

Immediately adjacent to the subject property, to the east across Madison Avenue, is an existing affordable housing development on M1-1 zoned land. Additionally, adjoining this existing development is the construction of additional affordable housing units. Immediately adjacent to the subject property, to the west across Juanita Avenue, is an existing affordable development on R4 zoned land. The Project would provide an appropriate transitional development between these existing residential developments in an area that is within close proximity to a commercial center and the major transportation corridor on Vermont Avenue which includes a Metro Red Line rail station, Metro Rapid Bus line 754 and Metro Local Bus lines.

The proposed project would comply with Los Angeles Municipal Code (LAMC) sections as permitted by the proposed CM-1 Zone and the Specific Plan Amendment to the Vermont/Western Transit Oriented Specific Plan (SNAP) that would create a new development standards for the new Subarea D.2.

The Vesting Airspace Tentative Tract Map, to permit the merger and re-subdivision of the land and the creation of one ground lot containing 5 air space lots necessary to facilitate the five-lot development of the project, is the subject of this application. The Vesting Airspace Tentative Tract Map would facilitate the creation of an affordable housing development with space provided for supportive services for the benefit of the Extremely Low to Low income homeless residents.

4. The design of the subdivision and the proposed improvements are not likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.

The site of the proposed project is relatively flat and developed with three, small detached residential buildings, three, small one-story commercial buildings and large surface parking lots that will be demolished to create a campus of five residential buildings for Restricted Affordable units and supportive services. The project is undergoing an environmental review pursuant to the CEQA. As there are apparently no water bodies on the site and runoff would be directed to local storm sewers, it would not be likely to result in any injury to fish as a result of the development of the project.

Any potential wildlife and habitats will also be studied in the CEQA analysis. The project site and the surrounding area are presently developed with structures and surface parking lots that do not provide a natural habitat for either fish or wildlife. Given the developed nature of the site and the surrounding area, it is not likely that there are any existing habitats or endangered wildlife that would be disturbed.

The site is located in an urbanized area in the Wilshire Community Plan area. The subject property has been developed with paved parking lots and structures which do not provide a natural habitat for either fish or wildlife. Similarly, the surrounding area has been developed with a mix of residential, commercial and industrial structures and paved parking lots.

The design of the subdivision and the proposed improvements are not likely to cause substantial impacts to the environment.

5. That design of the subdivision or type of improvements is not likely to cause serious public health problems.

There appear to be no potential public health problems caused by the design of the subdivision or the proposed improvements to the property. The design merely merges the lots into one ground level lot and five airspace lots.

The development is required to be connected to the City's sanitary sewer system, where the sewage will be directed to the LA Hyperion Treatment Plant, which has been upgraded to meet State-wide ocean discharge standards.

The City Planning Commission has taken an increased interest in the relationship of populations living near freeways and health risks. This issue creates tension between the City's desire to focus high intensity residential development near jobs and transit centers, which are typically serviced by or proximate to freeways and arterials.

In 2009, the City created a policy that required projects located near vehicular pollution sources to include a higher level of air filtration and to consider these potential impacts when designing the site massing and landscaping. On November 8, 2012, the City Planning Commission approved a Staff recommendation to attach a notice to all properties within 1,000 feet of a freeway highlighting that this potential health risk needs to be analyzed if residential uses are being proposed. Such notice is identified as a zoning information report ZI No. 2427 in this instance which gives property owners who are subject to discretionary permits notice to consider design alternatives to help reduce or address impacts and public health risks. The Project is located within approximately 500 feet of the 101 Freeway and will require a discretionary permit for approval of the subdivision map and therefore could potentially be subject to ZI No. 2427. Alternatives to help reduce or address impacts and public health risks will be considered in the Project design as established by compliance with CALGreen standards.

The proposed subdivision and subsequent Project improvements will be subject to numerous provisions of the Los Angeles Municipal Code (e.g., the Fire Code, Planning and Zoning Code, Health and Safety Code, and the Building Code). Other health and safety related requirements mandated by state and local law would apply where applicable to ensure the public health and welfare (e.g., asbestos abatement, seismic safety, flood hazard management).

The Project could improve the public health by the removal of the surface parking lots which facilitates the heat island effect and uncontrolled runoff.

The Project would not be placed over a hazardous materials site, flood hazard area, or be located on unsuitable soil conditions. The project would not place any occupants or residents near a hazardous materials site or involve the use or transport of hazardous materials or substances. The proposed residential land uses are consistent with surrounding land uses, as similar affordable housing developments are located to the immediate east and west of the Project Site.

The Department of Transportation requires the submittal of a parking and driveway plan to ensure safe egress and ingress of the project site and to ensure conformance with transportation safety design policies. The Applicant will work with the Department of Transportation to arrive at the proposed design of ingress and egress to the proposed Project.

Therefore, the design of the subdivision and the proposed improvements are not likely to cause serious public health problems.

6. That the design of the subdivision or the type of improvements will not likely conflict with easements acquired by the public at large, for access through or use of, property within the proposed subdivision.

No such easements are known to exist. Needed public access for roads and utilities will be acquired by the City prior to recordation of the proposed tract.

7. The design of a subdivision for which a tentative map is required pursuant to Section 66426 shall provide, to the extent feasible, for future passive or natural heating or cooling opportunities in the subdivision.

In assessing the feasibility of passive or natural cooling opportunities in the proposed subdivision design, the Applicant has prepared and submitted materials which consider the local climate, contours, configuration of the parcels(s) to be subdivided and other design and improvement requirements.

Providing for passive or natural heating or cooling opportunities will not result in reducing allowable densities or the percentage of a lot which may be occupied by a building or structure under applicable planning and zoning in effect at the time the tentative map was filed.

The lot layout of the subdivision has taken into consideration the maximizing of the north/south orientation.

The topography of the site has been considered in the maximization of passive or natural heating and cooling opportunities.

In addition, prior to obtaining a building permit, the subdivider shall consider building construction techniques, such as overhanging eaves, location of windows, insulation, exhaust fans; planting of trees for shade purposes and the height of the buildings on the site in relation to adjacent development.

Exhibit A

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Exhibit B

Proposed Specific Plan Amendment

**EXHIBIT B
SPECIFIC PLAN AMENDMENT
VERMONT/WESTERN TRANSIT ORIENTED DISTRICT SPECIFIC PLAN
(STATION NEIGHBORHOOD AREA PLAN)
PURSUANT TO L.A.M.C. SECTION 11.5.7 G**

Section 10.A Subarea D.2 – Commercial Manufacturing/Permanent Supportive Housing

Definitions

Whenever the following terms are used in this Subarea, they shall be construed as defined in this Section. Words and phrases not defined herein shall be constructed as defined in Section 4 of this Specific Plan, and Sections 12.03, 13.07.C and 13.09.B.3, Division 4 of Article 1, Chapter 9 of the Code, and Division 62 of Article 1, Chapter 9 of the Code if defined there:

Local Public Agency. A local public agency identified on a list maintained by the Department of City Planning (Department) that funds Supportive Services, keeps a prequalified list of service providers, or both.

Qualified Permanent Supportive Housing Project. The construction of, addition to, or remodeling of a building or buildings offering Supportive Housing; and where all of the total combined Dwelling Units or Guest Rooms, exclusive of any manager’s units, are affordable. For the purposes of this subdivision, affordable means that rents or housing costs to the occupying residents do not exceed 30 percent of the maximum gross income of Extremely Low, Very Low or Low Income households, as those income ranges are defined by the United States Department of Housing and Urban Development (HUD) or any successor agency, as verified by the Housing & Community Investment Department (HCIDLA). A minimum of 50 percent of the total combined Dwelling Units or Guest Rooms is occupied by the Target Population.

Target Population. Persons with qualifying lower incomes who (i) have one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health condition, and are homeless as defined by any Los Angeles City, Los Angeles County, State of California, or Federal guidelines; or (ii) are chronically homeless, as defined by any Los Angeles City, Los Angeles County, State of California, or Federal guidelines.

~~Local Public Agency. A local public agency identified on a list maintained by the Department of City Planning that funds Supportive Services, keeps a prequalified list of service providers, or both.~~

A. Use. The use and area regulations of Section 12.17.1 of the Code (CM Zone) shall apply to all lots in the Subarea D.2, except that residential uses are permitted provided the following requirements are met ~~such that and~~ the Project project meets the definition of a Qualified Permanent Supportive Housing Project:

- 1. Supportive Services.** Applicants shall provide documentation describing the Supportive Services that will be provided onsite and offsite. Prior to any approval of a Qualified Permanent Supportive Housing Project, the applicant shall submit information demonstrating that Supportive Services will be provided to residents

of the project. The applicant shall indicate the name of the entity or entities that will provide the Supportive Services, the Local Public Agency funding source(s) for those services, and proposed staffing levels. If a preliminary funding commitment is needed, the applicant shall also submit a signed letter of intent from the Local Public Agency verifying that it is providing a preliminary funding commitment for the Supportive Services. If no funding commitment is needed, the applicant shall demonstrate that the entity or entities that will provide the Supportive Services are service providers prequalified by a Local Public Agency.

2. Affordable Housing Covenant. Projects shall record a covenant acceptable to HCIDLA that reserves and maintains the total combined number of Dwelling Units and Guest Rooms designated as restricted affordable for at least 55 years from the issuance of the Certificate of Occupancy.

3. Housing Replacement. Projects shall meet any applicable dwelling unit replacement requirements of California Government Code Section 65915(c)(3), or as thereafter amended, as verified by HCIDLA, and all applicable covenant and monitoring fees in Section 19.14 of this Code shall be paid by the applicant prior to the issuance of any building permit.

4. Notification of Application. The following requirements shall be completed at least 30 days prior to the Department ~~of City Planning~~'s approval of the Qualified Permanent Supportive Housing Project:

a. Written Notices. The Department shall send written notices of the Qualified Permanent Supportive Housing Project application by U.S. mail to the abutting property owners,

b. Posting. The applicant shall post, in a conspicuous place near the entrance of the property, a public notice of the Qualified Permanent Supportive Housing Project application. The applicant shall submit proof of posting to the Department, which includes submission of a completed public notice form provided by the Department and photographs of the posted notice.

5. Performance Standards. A Qualified Permanent Support Housing Project must comply with the following Performance Standards:

a. Location Requirement. The Qualified Permanent Supportive Housing Project shall be located within a High Quality Transit Area for the horizon year in the current Regional Transportation Plan/Sustainable Communities Strategy for the Southern California Association of Governments region.

b. Onsite Supportive Services Requirement. Nonresidential floor area shall be provided for onsite Supportive Services in the following ratios:

(i) For Qualified Permanent Supportive Housing Projects with 20 or fewer total combined Dwelling Units or Guest Rooms, no less than 90 square feet of dedicated office space shall be provided onsite; or

(ii) For Qualified Permanent Supportive Housing Projects with greater than 20 Dwelling Units or Guest Rooms, a minimum of 3 percent of the total Residential Floor Area shall be dedicated for onsite Supportive Services provided solely to Project residents, including but not limited to community rooms, case management offices, computer rooms, and/or a community kitchen.

c. Massing. Buildings more than 200 feet in length along any exterior street-facing building facade shall include a design element that provides visual relief every 100 feet. The design element shall either setback from or step forward from the face of the building by at least a depth of 12 inches and shall be a width of no less than 5 percent of the building face (ex: 5 percent of 100' = 5') and shall extend up the face of the building to at least 50 percent of the facade height.

d. At-Grade Parking. No at-grade parking space shall be located within the front yard. Loading areas and off-street parking facilities containing three or more spaces shall be effectively screened from abutting streets and lots. The screening shall not obstruct the view of the driver entering or leaving the loading area or parking facility, or the view from the street of entrances and exits to a loading area or parking facility. The screening shall consist of one or more of the following:

(i) A strip at least 5 feet in width of densely planted shrubs or trees that are at least 2 feet high at the time of planting and are of a type that may be expected to form, within three years after time of planting, a continuous, unbroken, year round visual screen; or

(ii) A wall, barrier, or fence of uniform appearance. Such wall, barrier, or fence may be opaque or perforated, provided that not more than 50 percent of the face is open. The wall, barrier or fence shall be between 4 and 6 feet in height.

Commercial Corner Exemption. Notwithstanding any provisions of Sections 12.22 A 23 and 12.24 W 26 of the Code to the contrary, and except as otherwise required by this Specific Plan, Projects-projects that constitute a Commercial Corner Development or Mini-shopping Center, as defined in Section 12.03 of the Code, may be developed within Subarea D.2 without first obtaining a conditional use approval pursuant to Section 12.24 W 26 of the Code or having to comply with the requirements and conditions set forth in Section 12.22 A 23 of the Code.

- B. Density.** Qualified Permanent Supportive Housing ~~projects~~Projects shall be permitted unlimited density. No other residential uses are permitted including hotel, motel and apartment hotel.
- C. Floor Area.** Qualified Permanent Supportive Housing Projects shall not exceed a maximum Floor Area Ratio of 3:1. Areas designated exclusively for ~~supportive~~Supportive services~~Services~~ uses or public common areas accessible to all residents, including those for accessory residential or ~~supportive~~Supportive services~~Services~~ uses, shall not be considered floor area of the building for purposes of calculating the total allowable Floor Area. The Floor Area shall be measured to the center line of wall partitions between public and non-public areas.
- D. Transitional Height.** Notwithstanding any provisions of Section 12.21.1 A 10 of the Zoning Code to the contrary, portions of buildings on a lot located within Subarea D.2 shall not exceed the transitional height limits set forth below when located within the distances specified therein from a lot within the Subarea A.

<u>Distance</u>	<u>Height</u>
0 to 49 feet	25 feet
50 to 99 feet	33 feet
100 to 200 feet	61 feet

- E. Usable Open Space.** Notwithstanding any provisions of Section 12.21.G of the Zoning Code to the contrary, ~~Projects constituting~~ Qualified Permanent Supportive Housing Projects containing two or more Dwelling Units or Guest Rooms ~~dwelling units~~ contain usable open space in accordance with the standards of Section 12.21.G.2 of the Code, with the following exceptions:
 - 1. Common Open Space.** Notwithstanding the requirements in Section 12.21 G.2(a)(4)(i) of the Zoning Code, recreation rooms at least 600 square feet in area for a development of 10 or more ~~dwelling units or guest rooms~~Dwelling Units or Guest Rooms, or at least 400 square feet in area for a development of fewer than 10 ~~dwelling units or guest rooms~~Dwelling Units or Guest Rooms, may qualify as common open space, but shall not qualify for more than 40 percent of the total required usable open space.
 - 2. Above Grade.** Up to 75% of the common or private open space, regardless of the underlying zone, may be located above the grade level or first habitable room level.
 - 3. Roof decks.** Roof Decks, regardless of the underlying zone, may be used in their entirety as common or private open space, excluding that portion of the roof within 20 feet of the roof perimeter.

F. Project Parking Requirement

- 1. Residential.** Notwithstanding the contrary provisions of Section 12.21.A.4(a) of the Code and regardless of the underlying zone, no parking spaces shall be required for ~~dwelling units or guest rooms~~Dwelling Units or Guest Rooms restricted to the Target

Population of a Qualified Permanent Supportive Housing Project. For a Qualified Permanent Supportive Housing Project located within one-half (1/2) mile of a Transit Stop, no more than one-half (1/2) parking space shall be required for each income-restricted Dwelling Unit or Guest Room not occupied by the Target Population. Otherwise, no more than one (1) parking space shall be required for each income-restricted Dwelling Unit or Guest Room not occupied by the Target Population.

Notwithstanding the contrary provisions of Section 12.21 A 4 of the Zoning Code and regardless of the underlying zone, the following parking standards shall apply to all Qualified Permanent Supportive Housing Projects: One (1) parking space for every 20 ~~dwelling units or guest rooms~~ Dwelling Units or Guest Rooms shall be provided for the purpose of accommodating guests, ~~supportive~~ Supportive services, ~~case management~~ and managers' units. Up to 40% of the total required parking spaces may be provided as compact stalls.

Additionally, market rate units that do not qualify as managers' units for Qualified Permanent Supportive Housing Projects shall comply with the following standards:

a. Minimum Standards. Notwithstanding the contrary provisions of Section 12.21 A 4 (a) of the Code and regardless of the underlying zone, the minimum number of parking spaces required shall be provided at the following ratios: at least one parking space for each ~~dwelling unit~~ Dwelling Unit or Guest Room having fewer than three habitable rooms, and at least one and one-half parking spaces for each ~~dwelling unit~~ Dwelling Unit or Guest Room having more than three habitable rooms, in addition to at least one quarter parking space for each ~~dwelling unit~~ Dwelling Unit or Guest Room as guest parking.

b. Maximum Standards. Notwithstanding the contrary provisions of Section 12.21 A 4 (a) of the Code and regardless of the underlying zone, the maximum number of parking spaces provided shall be limited to the following ratios: a maximum of one parking space for each Dwelling Unit or Guest Room ~~dwelling unit~~ having fewer than three habitable rooms, a maximum of one and one-half parking spaces for each Dwelling Unit or Guest Room ~~dwelling unit~~ having three habitable rooms, a maximum of two parking spaces for each Dwelling Unit or Guest Room ~~dwelling unit~~ having more than three habitable rooms, and a maximum of one-half parking space for each Dwelling Unit or Guest Room ~~dwelling unit~~ as guest parking.

2. **Non-residential uses.** Parking shall be required pursuant to Section 12.21.A.4 of the Code.
3. **Bicycles.** Notwithstanding the contrary provisions of Section 12.21 A 16 of the Code and regardless of the underlying zone, for Projects with two or more dwelling units, off-street parking spaces for bicycles shall be provided at a ratio of one-half parking space per Dwelling Unit or Guest Room ~~dwelling unit~~, and for Projects with non-residential uses, regardless of the underlying zone, off-street parking spaces for bicycles shall be provided at a ratio of one parking space for every 1,000 square feet of non-residential floor area for the first 10,000 square feet of floor area, and one bicycle parking space for every additional 10,000 square feet of floor area. Bicycle parking spaces shall conform to the standards set forth in Section 12.21 A 16 (c)

through (h) of the Code, and the Guidelines.

G. Development Standards. Projects shall be in substantial conformance with the Guidelines.

Exhibit C

Proposed Development Standards

EXHIBIT C

VI. SUBAREA D.2 – COMMERCIAL MANUFACTURING/PERMANENT SUPPORTIVE HOUSING

The purpose of these regulations is to create a more opportunities for Qualified Permanent Supportive Housing; require concealment of offensive elements and activities from view; regulate transitional treatments where industrial sites abut residential uses; provide criteria for improved building design; and to improve the landscape standards.

Residential uses shall be prohibited except that Qualified Permanent Supportive Housing linked to onsite or offsite supportive services for the target population are be permitted. The height permitted is 100 feet, except that transitional height for portions of buildings located within specific distances of Subarea A must be observed.

Pedestrian arcades or mid-block pass throughways are required for projects with more than 250 feet of street frontage on Boulevards and Avenues.

Development Standards

The following standards have been established to promote development that enhances the economic vitality of the community by providing opportunities for offices and stores, live/work space, workshops and affordable housing. These standards apply to all new development and extensive remodeling projects.

Landscaped Buffers, or landscaped setbacks, referred to in this section of the document, unless otherwise indicated, shall conform to the following standards:

- a. be at least three feet wide;
- b. contain clinging vines along any adjacent walls or fences with a minimum height of three feet at maturity, and continuous ground cover planted over the entire setback;
- c. contain one twenty-four inch shade box tree, not less than ten feet in height at the time of planting, planted every 20 lineal feet. Shade trees as identified in the Street Tree List of the Bureau of Street Maintenance shall be planted;
- d. include an automated irrigation system; and
- e. be in accordance with a landscape plan prepared by a landscape architect, licensed architect, or licensed land scape contractor.

1. Landscape Plan. All open areas not used for buildings, driveways, parking, recreational facilities, or pedestrian amenities shall be landscaped by shrubs, trees, clinging vines, ground cover, lawns, planter boxes, flowers, fountains, and any practicable combination so that it is dust free and allows convenient outdoor activities, especially for children in mixed use or residential projects. Indigenous plantings are preferred, especially those that can support native species of butterflies and other small insects or animals. All landscaped areas shall be landscaped in accordance with a landscape plan prepared by a licensed landscape architect, licensed architect, or licensed landscape contractor.

2. Usable Open Space. No portion of the required usable open space shall have a slope exceeding 10%. Up to 75% of the usable open space may be provided above the ground floor regardless of the underlying Zone.

Common Usable Open Space. No portion of the required common usable open space shall have a dimension of less than 20 feet or be less than 400 square feet for projects under 10 dwelling units and 600 square feet for projects 10 dwelling units or more.

Private Usable Open Space. Once the standards for the common usable open space referenced in the paragraph above have been met, Projects may provide private usable open space, such as balconies or patios, with a minimum dimension of six feet for balconies and ten feet for patios, thereby reducing the required usable open space directly commensurate with the amount of private open space provided.

3. Streetscape Elements.

Note that virtually all street furniture requires the issuance of a revocable permit from the Bureau of Street Services in the Department of Public Works, prior to placement in the public right of way. Some variation in the design of the tree well covers, bike racks, street trees, trash receptacles or public benches may be authorized by the Director of Planning or his /her representative, for aesthetic, consistency or practical purposes, but not for the purpose of lowering costs to the Project.

Street Trees. At least one 36-inch box shade tree shall be planted in the public right of way on-center, or in a pattern satisfactory to the Bureau of Street Maintenance, for every 30 feet of street frontage. Shade trees as

identified in the Street Tree List of the Bureau of Street Maintenance shall be planted. An automatic irrigation system shall also be provided within the tree well. Businesses, tenants, and property owners along both block faces of a street are encouraged to collaboratively select a signature tree.

Tree Well Covers. A four foot by eight foot, black, cast iron tree well cover shall be provided for each new and reused street tree in the project area. The design shall meet the Americans With Disabilities Act requirements and minimize trip and fall accidents, and provide a cut out adequate for whatever tree used.

Bike Racks. One bike rack per lot, or 50 feet of lot frontage for lots with more than 50 feet of frontage, shall be required. Bike racks shall be installed three feet from the curb edge or per the City Department of Transportation's requirements. Simple bike racks painted black are required.

Trash Receptacles. One trash receptacle, painted black, per 100 feet of a lot frontage along major or secondary highways, to be maintained and emptied by the Project owner, and placed in the public right of way, according to the requirements of the City Department of Public Works.

Public Benches. One public bench, painted black with a backrest, three armrests, and intermediate frame, for every 250 feet of lot frontage on a major or secondary highway shall be required and placed in the public right of way according to the requirements of the City Department of Public Works.

4. Pedestrian/Vehicular Circulation. All structures shall be oriented toward the main commercial street where the parcel is located and shall avoid pedestrian/vehicular conflicts by adhering to the following standards:

Parking Lot Location. Surface parking shall be located to the rear of all structures if vehicular access is available to the rear of the parcel either via an alley or a public street. Where no vehicular access is available from the rear of any lot, parking shall be provided to the rear of a lot via a "flag" parking layout.

Waiver. The Director of Planning or his/her representative may authorize a waiver from the requirement to provide parking in the rear of the lot for mid-block lots that do not have through access to an alley or public street at the rear, and where creation of a flag parking lot results in a total building frontage of 30 feet or less. Applicants requesting a waiver shall submit

alternative site plan scenarios with calculations showing total building frontage. Applicants shall incorporate design mitigation measures to ensure the pedestrian oriented streetscape is not undermined.

Curb cuts. Whenever a project must take its access from a major or secondary street, only one curb cut shall be permitted for every 150 feet of street frontage on the main commercial street. Such curb cuts shall be a maximum width of 20 feet, unless otherwise required by the Departments of Public Works, Transportation or Building and Safety.

Pedestrian Entrance. All buildings that front on a Boulevard or Avenue or main commercial street, including parking structures, shall provide a pedestrian entrance at the front of the building, even when rear public entrances are provided. Maximum spacing of entries along commercial frontages for shops, lobbies or arcades is fifty feet.

Design of Entrances. Pedestrian Walkways, arcades or entrances shall be located in the center of the facade, or symmetrically spaced if there are more than one, or at the corner if in a corner building. Entrances shall be accented by architectural elements such as columns, overhanging roofs, awnings, etc.

Speed Bumps. Whenever a pedestrian walk way and a drive way share the same path for more than 50 lineal feet, speed bumps shall be provided on the driveway at a distance of no more than 20 feet apart.

5. Utilities. When new utility service is installed in conjunction with new development or extensive remodeling, all proposed utilities on the project site shall be placed underground. If underground service is not currently available, then provisions shall be made for future underground service.

6. Building Design. The purpose of the following provisions is to ensure that a project avoids large blank expanses of building walls, is designed in harmony with the surrounding neighborhood, and contributes to a lively pedestrian friendly atmosphere. Accordingly, the following standards shall be met:

Stepbacks. No portion of any structure located in Subareas D.2 shall exceed more than 30 feet in height within 15 feet of the front property line. (See Figure 1) All buildings with a property line fronting on a major highway, including Hollywood Boulevard, Sunset Boulevard, Santa Monica Boulevard

and Vermont Avenue, shall set the second floor back from the first floor frontage at least ten feet.

Transparent Building Elements. For any building located in a Non-Residential Zone, a minimum of 25 percent of that portion of the exterior street-facing walls which are between 2 feet to 8 feet above the sidewalk grade shall be comprised of transparent (untinted, unfrosted, non-reflective) windows or openings, exclusive of areas for walkways, driveways, paseos and plazas.

A minimum of 10 percent of the upper story portions of the exterior street-facing building facade as measured from the top of the finished ground floor to the top of the building facade shall be comprised of transparent (untinted, unfrosted, non-reflective) windows or openings.

Glass Transparency. Glass is considered transparent where it has a transparency higher than 80 percent and external reflectance of less than 15 percent.

Facade Relief. All exterior building walls shall provide a break in the plane, or a change in material every 45 feet in horizontal length and every 30 feet in vertical length, created by an articulation or architectural detail such as: a change in plane of at least six inches for a distance of not more than 45 feet; recessed entry ways, recessed windows, or pop-out windows; porticos, awnings, terraces, balconies, or trellises; building overhangs, projections or cantilevered designs; horizontal moldings; cornice lines; or other features or building materials that create a visual break. Aluminum framed window or doors that are flush with the plane of the building shall not be included as a change in material or as a break in the plane. Materials such as wood, glass block, brick, adobe and tile are encouraged. Architectural treatments on the building front elevation shall be continued on the sides and back of buildings.

Building Materials. All buildings shall apply at least two types of complementary building materials to exterior building facades such as adobe, wood, brick, stone or tile. Transparent building elements shall not be included as a change in material towards this requirement.

Surface Mechanical Equipment. All surface or ground mounted mechanical equipment, including transformers, terminal boxes, pull boxes, air conditioner condensers, gas meters and electric meter cabinets shall be

screened from public view and treated to match the materials and colors of the building which they serve.

Roof Lines. All roof lines in excess of forty feet must be broken up through the use of gables, dormers, plant-ons, cutouts or other appropriate means. (See Figure 4)

7. Rooftop Appurtenances. All rooftop equipment and building appurtenances shall be screened from public view or architecturally integrated into the design of the building as follows:

Flat Roofs. Building equipment and ducts shall be screened from view from any street, public right of way or adjacent property. The screening shall be solid and match the exterior materials, design and color of the building.

Pitched Roofs. Building equipment and ducts on pitched roofs shall be screened from view from any street, public right of way or adjacent property. The pitched roof shall be designed and constructed to accommodate roof-mounted equipment. A platform shall be constructed and recessed into the roof such that one side of the equipment shall be below the pitch of the roof. The remainder of the equipment and ducts which are above the roof pitch shall be screened from view. The screening shall be solid and match the exterior materials, design and color of the building.

Parapet Roofs. The parapet roof shall be designed and constructed to accommodate roof-mounted equipment. Any portions of the equipment or ducts which are above the parapet shall be screened from view from any street, public right of way or adjacent property. The screening shall be solid and match the exterior building material, design and color.

8. Trash and Recycling Areas. Trash storage bins shall be located within a gated, covered enclosure constructed of materials identical to the exterior wall materials of the building. The trash enclosure shall be minimum six feet high, and shall have a separate area for recyclable materials. (See Figure 5)

9. Pavement. Paved areas, excluding parking and driveway areas, shall consist of enhanced paving materials such as stamped concrete, permeable paved surfaces, tile, and/or brick pavers.

8. Trash and Recycling Areas. Trash storage bins shall be located within a gated, covered enclosure constructed of materials identical to the exterior wall materials of the building. The trash enclosure shall be minimum six feet high, and shall have a separate area for recyclable materials. (See Figure 5)

9. Pavement. Paved areas, excluding parking and driveway areas, shall consist of enhanced paving materials such as stamped concrete, permeable paved surfaces, tile, and/or brick pavers.

10. Freestanding Walls. All freestanding walls shall contain an architectural element at intervals of no more than 20 feet. All freestanding walls shall be setback from the property line adjacent to a public street with a landscaped buffer. Chain-link, barbed and concertina fences are not permitted. (See Figure 6)

11. Parking Structures-Required Commercial Frontage. All of the building frontage along major or secondary highways, for a parking structure shall be for commercial, community facilities, or other non-residential uses to a minimum depth of 25 feet. (See Figure 7).

12. Parking Structures-Facade treatments. The exterior elevations of all parking structures shall be designed to match the style, materials and color of the main building they serve so there is no notable differentiation between the parking and non-parking structure. (See Figure 8) If the parking structure is not architecturally associated with any one building, the wall at ground level shall be screened by a landscaped buffer.(See Figure 9)

13. Parking Structures Across from Residential Uses. Wherever a parking structure abuts or is directly across an alley or public street from any residential use or zone, the facade facing such residential use or zone shall conform to the following standards: a landscaped buffer in front of a decorative perimeter wall at least three feet six inches in height shall be provided along the sides of any structure which faces any residential use or zone, so that light is blocked and noise deflected; a maximum of 40% of the building facade shall be for openings that allow for natural ventilation; solid panels a minimum of three feet six inches tall shall be installed at the ramps of the structure which are adjacent to residential uses or zones so as to minimize headlight glare; light standards on any uncovered above ground level areas of the structure shall not be higher than the adjacent perimeter walls; and garage floors and ramps shall be constructed with textured surfaces to minimize tire squeal noises.

14. Surface Parking lots. Surface parking lots and driveways shall be paved with portland cement concrete, pervious cement, grass-crete or any other porous surface acceptable to the Department of Building and safety, that reduces heat radiation and/or increases surface absorption. A landscape plan prepared by a licensed landscape architect, licensed architect or licensed

landscape contractor shall be required. At least ten percent of a surface parking lot shall be landscaped in accordance with the following standards: One 24-inch box shade tree for every four parking spaces, spaced evenly to create an orchard-like effect; a landscaped buffer around the property line; and a three and a half foot solid decorative masonry wall trees as identified in the Street Tree List of the Bureau of Street Maintenance shall be planted. The trees shall be located so that an overhead canopy effect is anticipated to cover at least 50 percent of the parking area after ten years of growth. **(See Figure 10)**

15. Surface Parking Abutting Residential. Whenever a surface parking lot abuts or is directly across an alley from an residential use or zone, a decorative wall at least six feet in height shall be erected along the perimeter of the parking area facing such residential lot or use, and a landscaped buffer shall be installed along this wall with one 24-inch box shade tree planted for every 20 feet of landscaped buffer around the property line. A landscape plan prepared by a landscape architect, licensed architect, or licensed landscape contractor is required.

16. On-Site Lighting. On-site lighting shall be installed along all vehicular access ways and pedestrian walkways. Parking areas shall have a minimum of 3/4 foot-candle of flood lighting measured at the pavement. All on-site lighting shall be directed away from adjacent properties. This condition shall not preclude the installation of low-level security lighting.

Lighting Shielded. Sources of illumination shall be shielded from casting light higher than fifteen degrees (15) below the horizontal plane as measured from the light source. They shall not cast light directly into adjacent residential windows. Light Mounting Height. A maximum mounting height of light sources for ground level illumination shall be fourteen feet, measured from the finished grade of the area to be lit.

Lamp Color. Color corrected ("white") high pressure sodium (HPS), color corrected fluorescent (2,700-3,000 degrees K), metal halide, or incandescent lamps shall be used for ground level illumination. Standard "peach" high pressure sodium, low pressure sodium, standard mercury vapor, and cool white fluorescent shall not be used for ground floor illumination.

17. Security Devices. Security devices shall be screened from public view. Alternative methods such as interior electronic security and fire alarm systems are encouraged. If metal security grills are used, grilles which recess into pockets or overhead cylinders, completely concealed and retractable shall be

used and shall be integrated into the design of the building, using the space behind signage to house the gate if possible. Vertical or horizontally folding accordion grills in front of a building are prohibited. All security window bars shall be installed on the inside of the building.

18. Privacy. Buildings shall be arranged to avoid windows facing windows across property lines, or the private open space of other residential units.

19. Hours of operation. Parking lot cleaning and sweeping, trash collections and deliveries to or from a building shall occur no earlier than 7AM and no later than 8PM, Monday through Friday, and no earlier than 10AM and no later than 4PM on Saturdays and Sundays.

20. Noise Control. Any dwelling unit exterior wall including windows and doors having a line of sight to a public street or alley, shall be constructed so as to provide a Sound Transmission Class of 50 or greater, as defined in the Uniform Building Code Standard No. 35-1, 1979 edition, or latest edition. The developer, as an alternative, may retain an acoustical engineer to submit evidence, along with the application of a building permit, specifying any alternative means of sound insulation sufficient to reduce interior noise levels below 45dBA in any habitable room.

21. Required Ground Floor Uses. Any residential, community facility or commercial use permitted by the Specific Plan Ordinance is allowed on the ground floor.

Exhibit D

Land Use Map

Exhibit E

Industrial Feasibility Memo prepared by MR+E



Memo

From: David Bergman, MR+E

To: Flexible PSH Solutions

RE: Industrial feasibility at 316 Juanita, Los Angeles

Date 4/15/20

Project Description

Flexible PSH Solutions, a not-for-profit public benefit corporation, is proposing to develop 454 permanent supportive housing units for the chronically homeless along with 11,772 sq. ft. of program service support space. The project is called Enlightenment Plaza (henceforth referred to as “the Project”). Exclusive of the five managers’ units, the Project would be 100% Restricted Affordable housing, serving extremely low- to low-income individuals, and would be available only to target population members. To construct these units, the Project would redevelop an approximately 90,984-square-foot site located at 312–328 N. Juanita Avenue in the City of Los Angeles (henceforth referred to as “the Site”). The Site is located in an M1-1 zone with a limited industrial land use designation. The Site is currently improved with light industrial and commercial buildings, three residential units, and accessory surface parking. Table 1 summarizes the existing improvements at the site.

Table 1

Address	Use	Sq. Ft.	Year Built
316 N. Juanita	Industrial (Telecom)	6,105	1960
316 N. Juanita	Storage	240	1960
316 N. Juanita	Garage	2,160	1974
3812 W. Oakwood	Multi-unit Residential	384	1924
3813 W. Oakwood	Storage	160	1961
3814 W. Oakwood	Storage	760	1961

Source: City of Los Angeles Department of Building and Safety

Industrial Rents

Industrial use at this site is a remnant from a previous technological regime that required infrastructure and proximity of hard-wired telephone connections to users. The main industrial building at 316 N. Juanita was

constructed in 1961 to house telephone switching equipment, a function that is now largely obsolete. At present, the facility is mostly used for its surface parking capacity. It is not part of any local industrial agglomeration or district. There are currently two industrial land uses within 500 feet of the property, including:

- 310 N. Madison Ave (APN # 5501-00-2034). A 7,860 sq. ft. warehouse building constructed in 1971 that is used for vehicle storage and is occasionally rented for special events.
- 3655 Beverly Blvd. (APN #5501-002-009). A 1,296 sq. ft. building originally constructed as a retail store in 1964, now used for vehicular storage and office space for a pest control company.

The character of the surrounding area is primarily a mix of residential and commercial buildings, along with surface parking. The immediate vicinity does not contain any industrial infrastructure or uses other than access to US-101 (The Hollywood Freeway).

The market for industrial use in the area is limited. At present, two industrial properties are listed as being available for rent less than three miles from the site. These properties are listed in Table 2.

Table 2

Address	Size	Rent		Distance
		Sf/ Year	year built	
1027 Lillian Way	12,400	\$30	1962	2.25
1260 W 2nd St	11,900	\$9.72	1921	2.25

Source: LoopNet (accessed 4/12/20)

Both the available properties in the nearby market are significantly larger than the existing industrial properties on the site and, as such, are likely to receive higher market rents than what would be achieved by the existing buildings on site. The rental rates for leasable industrial buildings that are 6,000 sq. ft. or less and are located within Central Los Angeles range from \$10.20 per sq. ft. per year to \$33.60, with a median listed price of \$21.72 per sq. ft. per year.

Residual Land Value Analysis

At present, the cap rate for stabilized class A industrial space in the Los Angeles market averages 4.0%. Capital construction costs for new industrial/warehouse space in Los Angeles currently ranges between \$317 and \$203 per sq. ft., with an average cost of \$285 per sq. ft. Using these parameters, it is possible to prepare a residual land value analysis to determine the maximum feasible price that an industrial user could

pay for the land at the site in order to develop industrial space. Table 3 shows the results of this analysis. Given these inputs, the maximum feasible price at which an industrial user could purchase the site would be \$4.4 million per acre, or approximately \$9.2 million for the entire site. This compares to the \$17.8 million land purchase price that the Project was able to offer for the site.

Summary and Conclusions

New industrial development would not be feasible at the project site. The maximum price a feasible industrial project could purchase the project site for would be \$9.2 million. Generally speaking, new industrial development in the Los Angeles market is infeasible where land costs are greater than approximately \$101 per sq. ft. The existing improvements on the site are obsolete due to their configuration and the size of the space is not in demand in the market. The current asking price of \$21.72 per sq. ft. per year is below replacement costs for new construction and would therefore not be feasible as a reuse. The project site has minimal features that would support industrial use, is not located in an active industrial district, and is surrounded by incompatible land uses. Current market conditions effectively foreclose the possibility of redeveloping the project site for industrial use.

Table 3
Residual Land Value Analysis

Industrial Use at 316 N Juanita

Site			Annual Rents			Project Valuation		
Site Address:				Per	Total			
Parcel Size	90,984	SF	Industrial	\$21.72	SF	\$1,422,840	Cap Rate	4.00%
Parcel Size in Acres	2.09	AC	Total Gross			\$1,422,840	Capitalized Value (Total)	\$30,235,356
Site Coverage	80%		Less O&M	15%	Percent		Residual Land Value	
Gross Building Area	72,787		Net Revenue			\$1,209,414	Per SF of Site	\$101.35
Program			Parking Requiements					
Industrial				Rate	Spaces		Per Acre	\$4,414,665
	Percent	100%	Industrial	1 per 500 sq. ft.		146	Total	\$9,220,933
	Efficiency	90%	Total			146		
	Gross Leasable Area	65,508	Capital Costs					
Total				Per	Total			
	Industrial	65,508	Industrial	\$285	SF	\$18,669,866		
			Parking	\$100	Space	\$14,557		
			Demolition and site costs	\$10	SF	\$2,330,000		
			Total			\$21,014,423		