

**8811-8845 N. Sepulveda Boulevard  
15430 W. Rayen Street  
8832-8840 N. Langdon Avenue  
Los Angeles, CA 91434**

**Re: CPC-2016-2751-VZC-DB-SPR**

The applicant respectfully requests the following corrections and modifications to the decision letter for case CPC-2016-2751-VZC-DB-SPR issued May 22, 2017.

- 1) Request to modify: Project Description and Approvals section on the cover page, Conditions A.2, A.3. and A.4 on page C-1, Finding 2 at the top of page F-2, Finding 3 on page F-3, Finding 4 on page F-3 and F-4, Finding 7.a on page F-5, and Finding 8b.i. on page F-8, Finding 9.a. on page F-9, Finding 10.b on page F-10, Finding 10.c on page F-10:**

**Project Description and Approvals section**

*Demolition of existing structures and the construction of a new maximum 364 unit apartment building, with eleven percent of the total number of units provided set aside for affordable housing. The project will vary in height from two- to three stories of dwelling units above one-level of on-grade parking near Langdon Avenue to four- and five-stories of dwelling units above two-levels of on-grade parking near Sepulveda Boulevard. The project will provide a total of 557 automobile parking spaces. The project will provide 368 long term bicycle parking spaces, and 37 short term bicycle parking spaces.*

*3. Approved a set aside of 11 percent (~~44 units~~) of the total number of units provided reserved for Very Low-Income Households, pursuant to LAMC Section 12.22-A,25, to permit the construction of a maximum 364 residential units, utilizing Parking Option 1 and the following On-Menu Incentives:*

- a. Floor Area Ratio (FAR) of 3:1 on the portion of the site which is zoned C2-1 and is located within 1,500 feet of a rapid bus stop;*
- b. Permit vehicular and pedestrian travel from the less restrictive to more restrictive zone;*

**Condition A2.**

*A2. Residential Density. The project shall be limited to a maximum density of 364 residential dwelling units, consisting of ~~44 units~~ 11% of the total units provided set aside for Very Low-Income Households.*

**Condition A3.**

*A3. Affordable Units.*

- a. A minimum of ~~forty-four (44) units, that is 11 percent of the base~~ total number of dwelling units provided ~~permitted in the (T)(Q)R3-1 and C2-1 Zone~~, shall be reserved as Very-Low Income units, as defined by the State Density Bonus Law 65915 (C)(2).*

- b. *Changes in Restricted Units. Deviations that increase the number of restricted affordable units or that change the composition of units or change parking numbers shall be consistent with LAMC Section 12.22-A,25.*

**Condition A4.**

*A4. Housing Requirements. Prior to issuance of a building permit, the owner shall execute a covenant to the satisfaction of the Los Angeles Housing and Community Investment Department (HCIDLA) to make ~~forty-four (44)~~ 11% of the total number of units provided available to Very-Low Income Households, for sale or rental as determined to be affordable to such households by HCIDLA for a period of 55 years. Enforcement of the terms of said covenant shall be the responsibility of HCIDLA. The applicant will present a copy of the recorded covenant to the Department of City Planning for inclusion in this file. The project shall comply with the Guidelines for the Affordable Housing Incentives Program adopted by the City Planning Commission and with any monitoring requirements established by the HCIDLA. Refer to the Density Bonus Legislation Background section of this determination.*

**Finding number 2**

*The project site is a 4.34 acre site that has been developed with as a nursery. The project would remove the vacant structures on the site for the construction of a a maximum 364-unit residential building. As the project site is currently developed with a nursery, the project would not require the displacement of existing residents in order to provide the additional housing. The Westerly Portion of the site is zoned RA-1; however, the Community Plan contemplated the development of the site and surrounding areas for multi-family housing. The Community Plan designated the Westerly Portion with the Medium Residential land use designation, which lists the R3 Zone as a corresponding zone.*

*The recommended zone change to (T)(Q)R3-1 would permit the development of the underutilized and underdeveloped site with multi-family housing, consistent with designation by the Community Plan and Policy 1-1.1. In conjunction with the Easterly Portion of the site, which is zoned C2-1, the project proposes to develop the site with 340-364 residential dwelling units, of which ~~44 units~~ 11 percent of the total number of units provided will be set aside for Very Low-income Households. Although the project will not be utilizing the 35 percent density bonus, the project proposes to set aside dwelling units, consistent with LAMC Section 12.22-A,25, for Very Low-Income Households. The incorporation of affordable housing units will ensure that the development will provide new housing opportunities and choices for any income, age, or ethnic background. As such, the project is consistent with Objective 1-5 and Policies 1-5.1 and 3.*

**Finding 3**

*The project would improve the underutilized and underdeveloped site, which has not been improved since the 1960s, with a new and thoughtfully plan residential development that takes into consideration the existing development in the area. The project will set aside 44 11 percent of the total dwelling units provided for Very Low Income Households, providing new housing opportunities for individuals or families with*

restricted incomes. As proposed, the project would not only provide new and improved housing for mixed-incomes, but would provide amenities that would improve the quality of life for existing and future residents, consistent with the aforementioned goals and objectives.

#### **Finding 4**

4. *Housing Element.* The Housing Element of the General Plan will be implemented by the recommended action herein. The Housing Element is the City's blueprint for meeting housing and growth challenges. It identifies the City's housing conditions and needs, reiterates goals, objectives, and policies that are the foundation of the City's housing and growth strategy, and provides the array of programs the City has committed to implement to create sustainable, mixed-income neighborhoods across the City. The Housing Element contains the following goals and objectives:

##### GOAL 1: Housing Production and Preservation.

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

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

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

##### GOAL 2: Safe, Livable, and Sustainable Neighborhoods.

Objective 2.1: Promote safety and health within neighborhoods.

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

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

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

The recommended zone change from RA-1 to (T)(Q) R3-1 would allow for the development of the Westerly Portion of the site with multi-family density as contemplated by the Community Plan. The project would develop the 4.34 acre site with a maximum 364 dwelling units and will set aside ~~44 units~~ 11 percent of the total number of units provided for Very Low Income Households. The project would develop the underutilized site with additional housing opportunities for individuals and families, but for varying incomes as well. As proposed, the project would be consisting with Goal 1, as well as the objective and policies referenced above. The project will include a mix of market rate and restricted affordable units along a commercially developed corridor and within proximity to transit. Additionally, the project proposes to install one solar panel per dwelling unit and to provide a

minimum of 5 percent of installed EV chargers and 15 percent wired for installation of future EV chargers. Additionally, the project would comply with existing Green Building codes, which were adopted to help facilitate the reduction of energy consumption. As the project proposes to construct residential dwelling units along a designated Boulevard II and within 1,000 feet of a freeway, a portion of the project has been conditioned to provide air filtration systems and construction of sound proof windows to reduce noise from the street. As such, the project is consistent with Goal 2 of the Housing Element and aforementioned objectives and policies.

#### **Finding 7.a**

...Community Plan identifies a lack of open space in apartment projects and a scarcity of affordable housing as issues in the Plan Area. The recommended zone change to (T)(Q)R3-1 would allow the development of the westerly 1.35 acres of the site with multi-family housing, which would not be permitted with the current RA-1 Zone. In conjunction with the remaining 2.99 acres of the site, the project would develop the underutilized 4.34 acre site with a maximum 364 residential dwelling units, with ~~44 units~~ 11 percent of the total number of units provided set aside for Very Low Income Households. The project would not only provide much needed housing, but would provide a range of unit types and affordability for future residents.

#### **Finding 8b.i.**

The requested incentives, an increase in the allowable Floor Area Ratio (FAR) to a maximum of 3:1 for the portion of the site which is zoned C2-1 and to permit access from the less restrictive zone to the more restrictive zone, are expressed in the Menu of Incentives per LAMC Section 12.22-A,25(f) and, as such, permit exceptions to the zoning requirements that result in building design or construction efficiencies that provide for affordable housing costs. The requested incentives allow the developer to expand the building envelope so the additional affordable units can be constructed and the overall space dedicated to residential uses is increased. These incentives support the applicant's decision to set aside ~~44 dwelling units~~ 11% of the total number of units provided for Very Low Income households for a period of 55 years.

#### **Finding 9.a.**

...The project site is developed with a nursery which was in operation since the 1950s. The project would remove the existing structures and develop the site with a 340-364-unit residential building that would include ~~44 units~~ 11 percent of the total number of units provided designated for Very-Low Income Households. As discussed in Finding No. 2, the project would be in conformance with the goals, objectives, and policies of the Community Plan by improving an underutilized site with a mixed-income residential development that would provide a range of one to three bedroom units, effectively providing different housing types to meet the needs of the Community. Additionally, the project would be required to dedicate and improve the public rights-of-way, which would

be consistent with the intent of the Mobility Element of the General Plan. As such, the project is in substantial conformance with the General Plan and Community Plan.

#### **Finding 10.b**

...The project will develop the site with a maximum 364 residential dwelling units to be contained within four proposed buildings that will be located on one to two levels of above grade parking. The parking levels will be wrapped with residential dwelling units, as well as various residential amenities and services. Visibility of the parking levels will be minimal from the public rights-of-way. Parking will be accessible through driveways located along Sepulveda Boulevard, Rayen Street, and Langdon Avenue. Additionally, fire lane access will be provided from Rayen Street on the Western Portion of the site. This portion of the site has also been designed to provide a loading and service area. The Westerly Portion of the site, which has frontage along Langdon Avenue and Rayen Street, will be developed with one level of parking and one building that will range from two to three stories of residential dwellings. The building will be setback 34 feet from the northern property line on the Western Portion of the site. As proposed, the area will be designated for recreational or garden area. The Easterly Portion of the site, which has frontage along Sepulveda Boulevard and Rayen Street will be developed with two levels of parking and four to five stories of residential dwellings. The three buildings proposed on the Easterly Portion will be connected through pedestrian bridges located at the third story and above. The proposed project will observe all the required setbacks and has proposed to landscape the ground floor and podium level for the purposes of common open space. As proposed, the project would be compatible with existing and future development on adjacent properties and neighboring properties.

#### **Finding 10.c**

... The proposed project will develop the site with a maximum 364 residential dwelling units that will consist of one to three bedroom dwelling units. As required by LAMC Section 12.21-G, the project is required to provide 43,125 square feet of open space that may be provided as common or private open space. The project proposes to provide a 49,883 square feet of outdoor common open space located on the ground floor and podium level of the project. Of the 49,883 square feet of common open space, 29,575.8 square feet will be landscaped. The common areas located on the podium level has been designed to provide landscaping and separated areas for different types of recreational uses. These areas include: lounge garden, outdoor kitchen, dining area, pool terrace, game area, and play area. In addition to the outdoor common open space, the project will provide interior common open space that will include a fitness room along Sepulveda Boulevard and a game room along Langdon Avenue, adjacent to the proposed community park. Two of the buildings will feature indoor residential amenity areas on the third and fourth floors. Although not required, the project proposes to provide private balconies throughout the development. As proposed, the project has provided open space in excess of what is required by the zoning code and has programed the open space to take into consideration the varying recreational needs of

*the future residents. As such, the project has provided recreational and service amenities to improve the habitability for its residents and minimize impacts on neighboring properties.*