

## FINDINGS

### Redevelopment Plan Compliance Findings

**Pursuant to Section 11.5.14 D.5(d) of the LAMC, the Director shall grant a Project Compliance upon written findings that the project:**

- 1. Substantially complies with the relevant Redevelopment Regulations, findings, standards and provisions of the Redevelopment Plan.**

The project furthers the following goals of the Redevelopment Plan as follows:

Section 1300 – The Project Site's location at 806 W. Adams Boulevard falls within the Expanded Project Area boundary on page 34 of the Redevelopment Plan, within the "Low Medium II" designation area, one of three of the Redevelopment Plan's medium density multi-family residential zones, which in this case allows for a maximum of twenty-four dwelling units per gross acre. The Project, a medium density multi-family residential development, substantially complies with the Low Medium II designation under the Redevelopment Plan, as set forth below.

Section 1301 – As stated in Section 1301 of the Redevelopment Plan, designated land uses within the Expanded Project Area under the Redevelopment Plan are only permitted to the extent that they are consistent with the applicable Community Plan. The Project Site is located within the South Los Angeles Community Plan area with a Land Use Category of "Low Medium II Residential." The Low Medium II Residential category, as identified in the applicable South Los Angeles Community Plan General Plan Land Use Map, includes the corresponding zones of RD1.5, RD2, and RZ2.5. The Project Site is within the RD 1.5 zone. The Project substantially conforms with the purpose, intent and provisions of the Community Plan, and complies with the development standards applicable to the Low Medium II Residential designation and the RD1.5 zone. The base density is 1 unit per 1,500 square feet (83 units), and the maximum height is 45 feet. Yard requirements are 15 feet for the front and rear, and 7 feet for the sides (5 feet plus one foot per every additional story above the second). The maximum Floor Area Ratio is 3:1 which, starting with an area of 106,454 square feet (this is the total lot area minus the setbacks for a one story building), makes for a total of 319,362 square feet. Based on the foregoing, the Project substantially conforms with Section 1300 and 1301 of the Redevelopment Plan.

Section 1302 – The Project proposes the development of 102 residential dwelling units in conformity with the residential use requirement and medium density residential designations under the Redevelopment Plan. The Project only includes multiple family housing with ancillary amenity, parking and open space areas and includes no nonconforming uses.

As stated above, the Redevelopment Plan Map indicates that the Project Site falls within the Expanded Project Area and is designated as being in the Residential Low Medium II category. Section 1304 of the Redevelopment Plan indicates new housing in this area shall not exceed 24 units per acre. However, as set forth below, the City finds that the Project is permitted to exceed 24 units per acre pursuant to Redevelopment Plan Section 1306. The Project therefore substantially conforms with Section 1302 of the Redevelopment Plan.

Section 1304 – At a density of one unit per 1,500 square feet of lot area per the LAMC, the 124,757 square foot Project Site would support 83 dwelling units. The Project proposes to construct 102 units in compliance with the City's Density Bonus ordinance and the state Density Bonus statute, applicable to the Project due to providing six percent of its base

number of units at the Very Low Income level. As a result of this provision of affordable units, the Project qualifies for a 22.5 percent density bonus under the City's Density Bonus ordinance under Los Angeles Municipal Code Section 12.22.A.25 and the State Density Bonus law under Government Code Section 65915, subsection (f)(1), allowing the Project's proposed 102 unit density.

Government Code Section 65915, subsection (f) states that local agencies must utilize, as the base density for projects that qualify for density bonuses, the density limits provided in a general plan or zoning code as of the date of the application by the applicant to the City. The Project's zoning entitlement application, including the request for Density Bonus review and incentives, was filed on April 30, 2018. The applicable General Plan and zoning code provisions then in effect apply a base density of 1 unit per 1500 square feet of lot area for the RD 1.5 zone, which applies to the Project Site.

The base density for the 124,757 square foot Project Site under this applicable state law standard is thus 83 units. The applicable General Plan and zoning code provisions in effect at that time do not provide for any lower base density, including under Los Angeles Municipal Code Section 12.21.3, which allows the incorporation into the zoning code of height and Floor Area Ratio standards under a Redevelopment Plan, but not density. The Project is consistent with the height limit imposed by Redevelopment Plan Section 1325, which adopts by reference the applicable height limit under local ordinances, where the Project is consistent with the 45 foot height limit applicable to the RD1.5 zone, and the Redevelopment Plan does not impose an independent Floor Area Ratio limit on the Project.

Accordingly, any lower density limits under the Redevelopment Plan under the Low Medium II designation could not apply to the City's approval of the Project under the terms of the State Density Bonus law, because the base density for the determination of the base and total densities for the Project are based on the zoning code density at the time the Project was applied for in April 2018. In addition, Los Angeles Municipal Code Section 11.5.14, adopting Redevelopment Plan Procedures into the zoning code, did not become effective until November 11, 2019, well after the project's entitlement application was filed in April of 2018, so that provision as well does not affect the City's base density and Density Bonus determinations for the Project. Nevertheless, Section 1306 of the Redevelopment Plan permits higher densities than otherwise permitted by Sections 1303, 1304, and 1305, thereby allowing a greater "base density" so long as the project can show conformance to criteria 1 through 4. By providing an additional 3 workforce housing units, the project demonstrates further conformance to these four criteria.

Furthermore, under recent revisions to the State Housing Accountability Act under Senate Bill 330, the Housing Crisis Act of 2019, the City is prohibited from reducing the density of residential development projects including affordable housing units pending approval before the City such as the Project unless certain findings can be made under Government Code Section 65589.5, subsection (d). The City finds that it cannot make these findings for the Project for the following reasons: (1) as set forth in the General Plan Housing Element 2013-2021, the City's share of the regional housing need allocation pursuant to Section 65584 for the Very Low Income affordable housing category proposed for the housing development has not yet been met and, in any event, the City finds it has a critical need for additional multi-family housing units, which would be provided by the Project; (2) as a standard residential Project consistent with zoning.

**2. Is subject to all conditions required by the relevant Redevelopment Regulations.**

The approval herein includes Conditions to ensure compliance with the Redevelopment Regulations as discussed above in Finding No. 1.

### 3. **Complies with CEQA.**

The City of Los Angeles has determined based on the whole of the administrative record, that the Project is exempt from CEQA pursuant to CEQA Guidelines Section 15332 (Class 32/In Fill Development), and none of the exceptions to a categorical exemption pursuant to CEQA Guidelines Section 15300.2 applies. The proposed project will not result in significant cumulative impacts from successive projects of the same type in the same place. The project does not involve unusual circumstances. The proposed project will not damage scenic resources in a state scenic highway. The project site is not on a list compiled pursuant to Government Code Section 65962.5 related to hazardous waste sites. The project will not cause a substantial adverse change in the significance of a historical resource.

### 4. **Any other findings that are required in the relevant Redevelopment Plan.**

Section 1306 – The Redevelopment Plan states that, “in order to promote revitalization and after the review and recommendation of the Project Area Committee, the Agency may, but is not required to, subject to a development or participation agreement, authorize new housing to be developed at higher densities than otherwise permitted by sections 1303, 1304, 1305. The purpose is to achieve flexibility in housing design, well-planned neighborhoods offering variety in housing and environment to all socioeconomic groups, and to provide appropriate land use through special methods of development.”

In this case, the project will be providing a new residential development in place of an under-utilized site on a prime residential corner within the Redevelopment Plan. As discussed herein, in exchange for greater density, “agency approval of the development shall:”

- *Contribute to the revitalization goals of the plan.*

The Project would be situated between a four-story residential building to the west across Severance Street, a three-story residential building to the north across Adams Boulevard, a two-story commercial building on the adjacent property to the east, and two and one-story residential and educational buildings to the south owned by the University of Southern California. The Project is more-broadly situated within a vibrant university community in close proximity to transit and a variety of cultural, dining, educational, and entertainment amenities. As such, the project meets the goals of Section 1200 to make provisions for housing as is required to satisfy the needs and desires of the various age, income and ethnic groups of the community, maximizing the opportunity for individual choice and alleviates overcrowded, substandard housing conditions to promote the development of sufficient number of housing units for low and moderate income households.

- *Contribute to a desirable residential environment, neighborhood stability, and not adversely impact the neighboring environment.*

The Project would include outdoor residential amenity spaces at the podium and building roof levels. The podium-level amenity space is proposed to include landscaping, gathering areas, paseos, outdoor cooking areas, and an outdoor swimming pool. The pool area, which is located at a second level deck along the Severance Street frontage, is designed to include a steel-framed, five foot glass barrier to reduce potential noise

impacts on neighboring uses. The Project building roofs would contain additional private amenity spaces that would include landscaping and outdoor lounge and cooking areas, which are all located to the center of the property away from neighboring uses.

- *Provide units with adequate living area and avoid excessively dense development.*

The Project's approved density per the state Density Bonus law puts the proposed project density at approximately 1,218 square feet of lot area per unit. By comparison, the three existing apartment blocks (Hillview Apartments, Regal Trojan, and USC Founders Apartments) along the south side of West Adams Boulevard between Severance and Portland Streets have densities of approximately 500-620 square feet of lot area per unit. While the Project consists mainly of unit layouts with 5-7 bedrooms per unit, all bedrooms are grouped around generous common room living/kitchen and dining areas. Many of the adjacent single-family homes have a similar range of 4-8 bedrooms per unit, with many of the apartment buildings westwards along Adams Boulevard and Severance Street are four stories and of a similar height to the proposed project.

The project also includes outdoor residential amenity spaces at the podium and building roof levels. The podium-level amenity spaces are apportioned into long courtyards that subdivide the site lengthwise, including landscaping, gathering areas, paseos, outdoor cooking areas, and an outdoor swimming pool. The pool area, which is located at a second level deck along the Severance Street frontage, is designed to include a steel-framed, five-foot glass barrier to reduce potential noise impacts on neighboring uses. The Project building roofs would contain additional private amenity spaces that would include landscaping and outdoor lounge and cooking areas, which are all located to the center of the property away from neighboring uses.

As a benefit to the community, the Project also provides two covenanted affordable 3-bedroom units created for families at the Workforce affordability level, along with the five 5 five-bedroom units to be covenanted for tenants qualifying at the Very Low Income level pursuant to the prior Density Bonus approval, thereby providing housing for various income levels in the community.

- *Provide adequate parking.*

The seven buildings would sit on a fully enclosed and fully screened single level ground floor parking structure providing a total of 255 vehicle parking spaces for off-street parking. California Government Code Section 65915, subsection (p)(1) provides that, where a project provides the required amount of affordable housing for the required term, a local land use permitting authority is prohibited from imposing parking ratios that exceed 2.5 spaces for dwelling units with four or more bedrooms. Accordingly, with 102 units constructed for the Project, the Project conforms to the requirement by providing 255 spaces. The parking garage screening has been designed to seamlessly integrate with the rest of the building, completely eliminating the visual appearance of a parking garage. Ingress and egress to the parking structure would occur through a primary driveway off of Adams Boulevard and a secondary driveway on University Avenue.